

City of Pasco
Comprehensive Plan:
**Non-project Final
Environmental
Impact Statement**

September 2020

Prepared for:
City of Pasco



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Integrated Non-project Final Environmental Impact Statement

Factsheet

Project Title:

Integrated Non-Project Final Environmental Impact Statement for the City of Pasco 10-year Comprehensive Plan

Proposed Action and Alternatives:

The City is updating its Comprehensive Plan based on projected growth projections. Three alternatives were studied in the Draft Environmental Impact Statement (EIS), including a No Action Alternative and two Action Alternatives.

No Action Alternative

The No Action Alternative growth will occur based on the past trends. No land use change will occur to affect the growth pattern. The UGA boundary would remain as currently identified for the City.

Alternative 2: Recommended Growth Target

Alternative 2 proposes changes in the Comprehensive Plan land use designations to accommodate Pasco's 20-year population growth and capitalize on other development opportunities in a large UGA area expansion on the northern borders of the City.

Alternative 3: Recommended Growth Target High Density, Preferred Alternative

Alternative 3, the Preferred Alternative, proposes changes in the Comprehensive Plan land use designations with higher density land use designations proposed in a UGA area expansion on the northern borders of the City, and smaller in area than Alternative 2, and also through increased in-fill development and higher density development, including redevelopment, within the City.

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Required Permits and/or Approvals:

Adoption of the Comprehensive Plan by the City of Pasco Council; review by the Washington State Department of Commerce, as required by the GMA. Additionally, any approval of the Urban Growth Area expansion would be granted by the Franklin County Board of County Commissioners. Also, the

transportation element will be reviewed and is expected to be certified by the Benton-Franklin Council of Governments.

Authors and Principal Contributors:

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May 21, 2020

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September 10, 2020

Related Plans and Documents

- City of Pasco Draft Comprehensive Plan 2020 (September 2020) - Volume 1
- City of Pasco Draft Comprehensive Plan (September 2020) - Volume 2, prepared by Oneza & Associates
- The City of Pasco Urban Growth Area Expansion Capital Facilities Analysis (May 21, 2020) and its appendix, Expanded UGA Infrastructure Evaluation by Murray Smith and Associates (November 18, 2019)

A limited number of CD and hard copy Final EIS documents are available at the City of Pasco Community & Economic Development Department at 525 N 3rd Avenue, Pasco, Washington 99301. The Final EIS is also available online at:

<https://www.pasco-wa.gov/1088/10763/Comprehensive-Plan-Update-2018-2038>

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Chapter 1. Overview

1.1. Introduction

The City of Pasco (City) is updating its Comprehensive Plan (Plan) consistent with the Growth Management Act (GMA; Revised Code of Washington [RCW] 36.70A). Every 10 years, the City is required to update its Plan. Pursuant to the GMA, the City was to complete the update by the target date of June 30, 2018; this plan is expected to be completed by Fall 2020.

The Plan consists of goals, policies, and analyses of the following elements: economic, land use, transportation, utilities, capital facilities, and housing. It also includes parks and recreation, schools, municipal facilities, fire and emergency services, police services, telecommunications, and Irrigation District Facilities. The Plan guides decisions about development and growth within the City limits and in the Urban Growth Area (UGA). It is designed to help the City meet its long-term vision for growth. The updated document contains visions, goals and policies, and analyses. The Plan is also required to be consistent with the County-wide Planning Policies established for Franklin County (Franklin County 2019).

The City has determined this proposal is likely to have significant adverse impact of the environment. An environmental impact statement (EIS) is required under RCW 43.21C.030(2)(c).

1.2. What is an Integrated SEPA/GMA document?

In 1995, the Department of Ecology (Ecology) adopted amendments to the Washington State Environmental Policy Act (SEPA; Washington Administrative Code [WAC] 197-11-210) to authorize cities and counties planning under GMA to integrate the requirements of SEPA and GMA. These new rules (WAC 197-11-210 through 235) allow the environmental analysis required under SEPA to occur concurrently with and as an integral part of the planning and decision making under GMA. The City has decided to follow this course and incorporate the EIS discussion of the impacts of the Plan by SEPA into the Plan itself.

The integration of SEPA and GMA results in improved planning and project decisions from the environmental perspective. Just as GMA goals cannot be addressed without consideration of environmental factors, the goals of SEPA are benefited by the examination of the "big picture" and identification of mitigation to address cumulative impacts of development that occurs during GMA planning.

1.3. What is an EIS

An EIS is a document required under the SEPA that evaluates the possible impacts of a proposed action. Several different ways of achieving the goal must be explored and contrasted before a final option/alternative is chosen. The EIS alternatives provide a framework for analyzing impacts and making comparisons among different land use options.

This document discusses the current state of the City, presents two action and one no-action alternative for the future of the City, and analyzes expected changes under each alternative. No alternative should be considered definitive. This will allow decision makers, with input from residents, the opportunity to incorporate the better features of each alternative (if appropriate) into a recommended Plan.

1.4. What is this Process

First, the Responsible Official of the City determined an EIS was required. Once that occurred, the City issued a Scoping Notice to request public input on the scope of the document, including issues to be addressed, alternatives to be evaluated, and the level of detail to be provided. Several public comments were received during scoping, as provided in Appendix A. These comments were considered in both scoping the draft EIS and the alternatives and in analysis of specific topics addressed in the draft EIS. Once a final scope of work had been determined, then the draft comprehensive plan was prepared, and this draft EIS was also prepared to more fully consider effects and also to solicit comments during the public review process.

1.5. Background information on GMA

In 1990, the Washington State Legislature recognized that uncoordinated and unplanned growth was reducing the quality of the environment and of life in many areas of the State, and so adopted the GMA. The overall goal of this legislation is to provide a managed framework for growth and development throughout Washington State. There are 14 goals in GMA as follows:

- Urban growth: Encourage development in urban areas where adequate public facilities exist or can be provided.
- Reduce Sprawl: Reduce inappropriate conversion of undeveloped land into sprawling, low-density development.
- Transportation: Encourage efficient multimodal transportation systems based on regional priorities.
- Housing: Encourage the availability of affordable housing to all economic segments of the population.
- Economic Development: Encourage economic development consistent with adopted Plans, promote economic opportunity for all citizens, especially for the unemployed and the disadvantaged, and encourage growth in areas experiencing insufficient economic growth, all within the capacity of the state's natural resources, public services and public facilities.
- Property Rights: Protect property rights from arbitrary or discriminatory actions.
- Permits: Process permits in a timely and predictable manner.
- Natural Resource Industries: Conserve timber, agricultural, and mineral resource lands.
- Open Space and Recreation: Retain open space and enhance recreational opportunities.
- Environment: Protect the environment and enhance air quality and availability of water.
- Citizen Participation and Coordination: Foster early and continuous public participation in the planning process.
- Public Facilities and Services: Provide adequate public facilities and services to serve new growth.
- Historic Preservation: Encourage historic preservation.

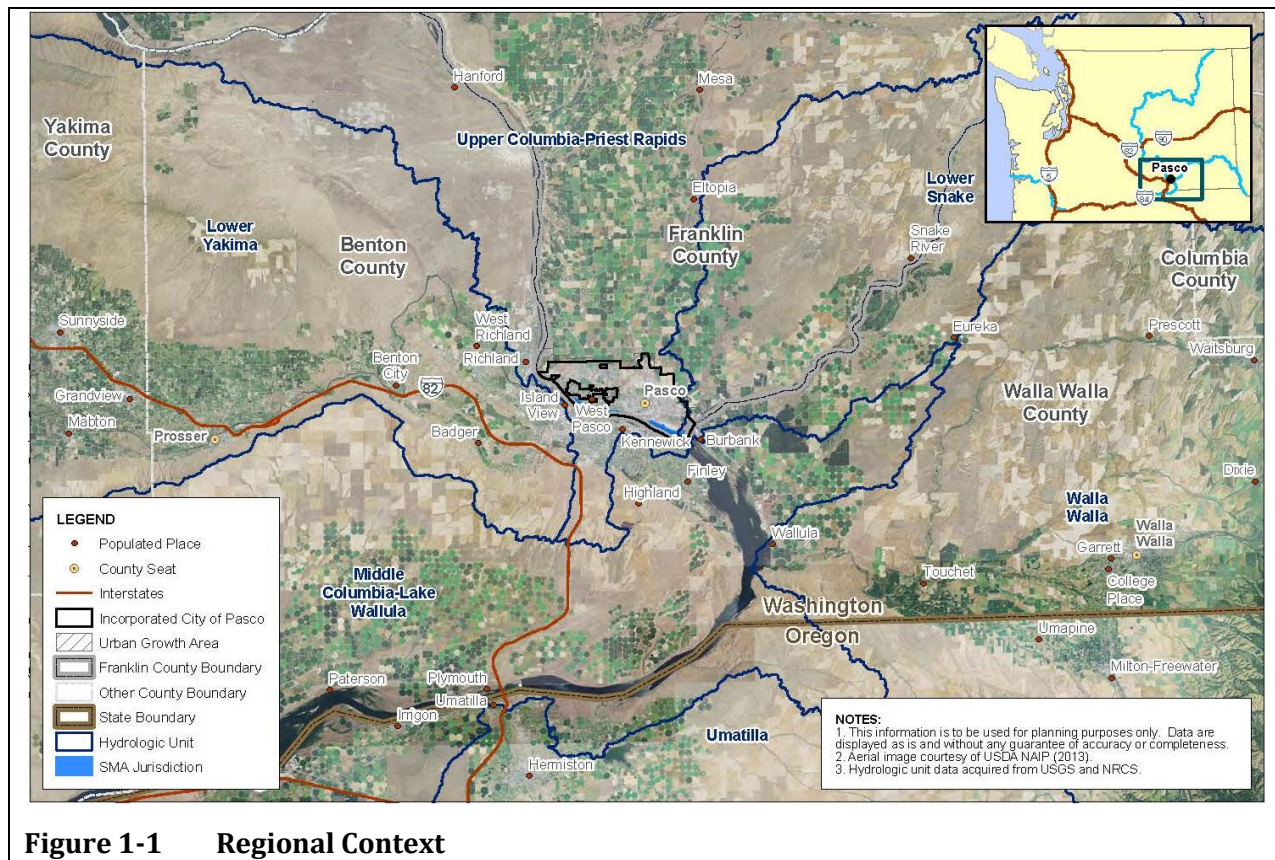
Shoreline Management: Incorporate the goals and policies of the Shoreline Master Program (SMP) into the Plan.

In order to attain these goals, cities and counties planning under GMA are required to develop Plans addressing land use, transportation, housing, utilities, and capital facilities for the next 20 years. Plans are required to be updated every 10 years.

1.6. Location

The proposal includes the City limits and UGA boundary. The City of Pasco, Washington, is in Franklin County bordered by the Columbia and Snake rivers, in the geographic region known as the Mid-Columbia Basin. Pasco and the nearby communities of Richland and Kennewick are commonly called the Tri-Cities.

The Tri-Cities area is the largest metropolitan area between Spokane, 145 miles to the northeast, and Seattle, 220 miles to the northwest. Boise, Idaho, is situated 300 miles southeast of Tri-Cities. Because of its location, the Tri-Cities metro has become a major transportation and commercial hub for travelers, and commodities in the Pacific Northwest. Figure 1-1 shows the City regional context.



1.7. Summary of the Proposal

A Public Participation Plan was adopted by the City. The City provided multiple opportunities for public involvement in the form of public workshops with the Planning Commission and City Council (also broadcast on cable television), open houses, and through a Plan update webpage. The City reached out to agencies such as Pasco School District, Columbia Basin College, Benton Franklin Council of Government, Washington State Departments of Commerce and Transportation and other agencies. The Plan's goals, policies, and elements reflect the input received from the public.

The City of Pasco is updating its Comprehensive Plan (Plan) consistent with the Growth Management Act (GMA; RCW 36.70A). The updated Plan consists of goals, policies and analyses of the following elements and sub-elements: land use, housing, capital facilities, transportation, economic development, utilities, open space, public services, resources lands, and critical areas and shorelines.

The updated Plan guides decisions about development and growth within the City limits and the Urban Growth Area (UGA). It is designed to help the City meet its long-term growth target as allocated by the Office of Financial Management (OFM). The updated plan contains vision, goals and policies, analyses of future growth and potential UGA expansion, and updated elements to comply with the GMA. The Plan is also required to be consistent with the Countywide Planning Policies established for Franklin County.

The current OFM population estimate for Pasco is 73,590 (OFM 2018). Population of the City is expected to reach 121,828 by 2038, an increase of 48,238 persons over the current population (Table 1).

Table 1
Population Estimates

	Population in Franklin County	Population in Pasco ¹
2018	93,541	73,590
2028	121,792	97,434
2038	152,285	121,828
10 year increase	28,251	23,844
20 year increase	58,744	48,238
Additional residential units needed in Pasco in 10 years ²		7,522
Additional residential units needed in Pasco in 20 years ²		15,217

1. OFM Medium Series. Historically, Pasco's share has been 80 percent of the County population.

2. Based on OFM - household size: 3.17

The land capacity analysis indicates that the City and the existing UGA has the capacity to accommodate 30,372 persons in the vacant, and under-utilized land and in the current UGA. See Table 2 for details.

Table 2
Existing Residential Capacity

	Acres	Capacity for additional residential units	Additional population needed to be accommodated
Developable land in the City limits	428.20	1,490	4,723
Developable land in existing UGA	199.70	1,091	3,459
Broadmoor area ¹		7,000	22,190
Current capacity including Broadmoor.		9,581	30,372

1. Capacity anticipated in the Broadmoor area in the draft master plan

1.8. Scope of Review

This Integrated EIS analyzes, at a programmatic level, the potential impacts on the following elements of the environment identified through the scoping process:

- Earth
- Water
- Plants and Animals
- Land Use
- Environmental health
- Shoreline Use
- Population, Housing, and Employment
- Parks and Recreation
- Transportation
- Public Services and Utilities
- Heritage Conservation

Chapter 2. Alternatives

2.1. Description of EIS Alternatives

The City is proposing three alternatives based on projected future growth patterns. Alternative 1, No Action, calls for keeping the City's existing Plan without modifications. Alternative 2, Recommended Growth Target, allows for changes in the Plan to accommodate the 20-year population growth projection for Pasco allocated by the OFM. Alternative 3, Recommended Growth Target High Density also accommodates the 20-year growth projection but through a growth pattern of higher density.

2.2. How the Alternatives Were Developed

For the Draft EIS, the City conducted multiple visioning workshops with the public, Planning Commission, and City Council to develop the alternatives. An online survey was also available to offer input on multiple issues. Public input was gathered in accordance with the adopted Public Participation Plan. Multiple ways of outreach include:

- Online, television, and mail
- Public meetings
- Council and Commission workshops
- Online survey
- Topic group discussion
- Other agency coordination

Key topics to address in the Plan were gathered during the outreach process. These include:

- Include a higher density alternative
- Transportation system (roads/airport) and other infrastructure impacts
- Characterize impacts to agriculture lands and critical areas/shrub steppe
- Consider employment forecast and regional availability of industrial lands
- Conduct detailed land capacity and densities analysis
- Characterize impacts on existing water rights and needs/deficiencies
- Evaluate affordable housing effects
- Characterize air quality effects

2.3. The Alternatives

The EIS is considering three alternatives for evaluation based on future growth expectations. Alternative 1, No Action, Alternative 2, Traditional Growth Target, and Alternative 3, Compact Growth Target. Description of each alternative with maps are summarized below.

2.3.1. Alternative 1: No Action

SEPA requires an EIS study to contain a "no action" alternative. This alternative would maintain the City's existing Comprehensive Plan without modifications. This means growth would be expected consistent with past trends but no land use changes would occur to accommodate this growth. The Urban Growth Area would remain the same. Limited policy changes may be needed to maintain consistency with the GMA and the Countywide Planning Policies.

The land capacity analysis indicates that the City and the existing UGA has the capacity to accommodate 29,629 persons. This alternative will have a deficit of land to accommodate 18,625 (48,238 - 29,613) persons.

The existing land use distribution in the City is shown in Figure 2-1 and described in Table 3. Draft EIS Chapter 2 includes a more detailed description of Alternative 1.

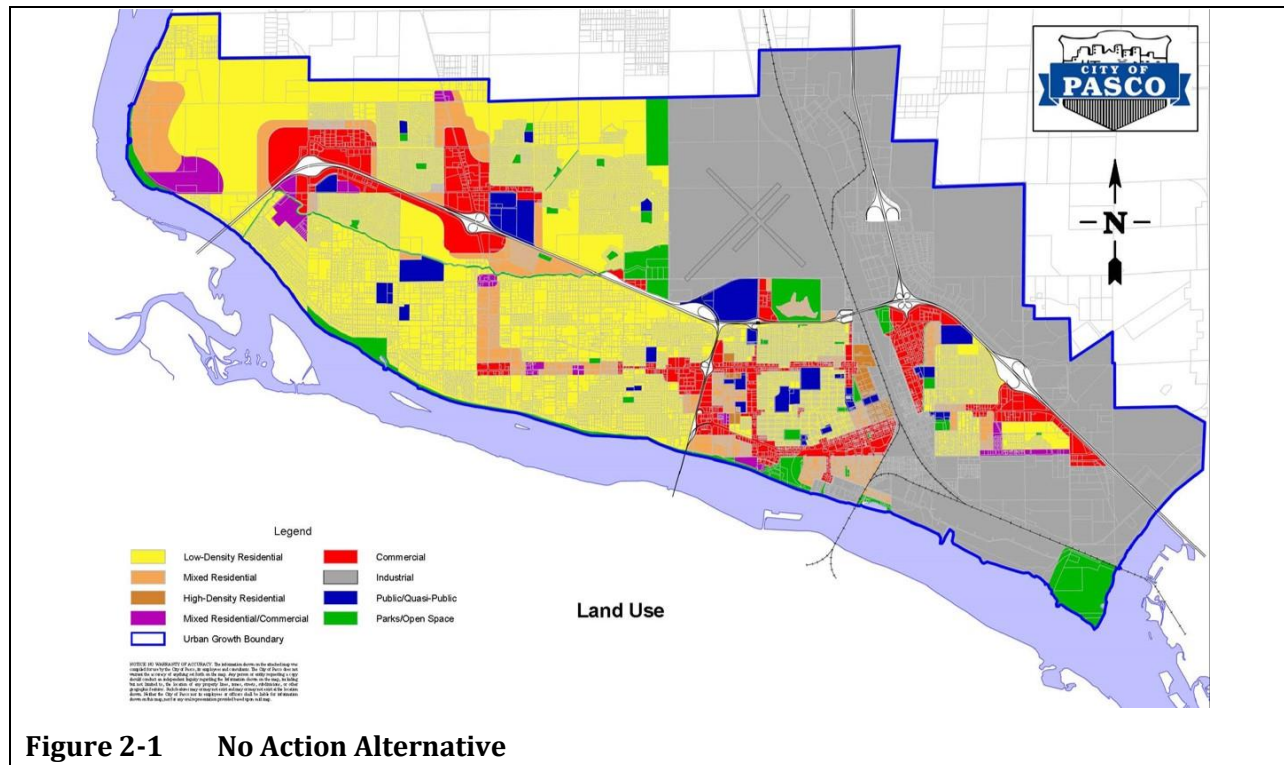


Figure 2-1 No Action Alternative

Table 3
Alternative 1 Existing Land Use Acreage

Land Use Designations	City Limits	UGA	Total
Residential Lands			
Low Density	7,624.78	1,675.85	9,300.63
Mixed Density	1,252.65	425.18	1,677.83
High Density	188.59	—	188.59
Subtotal	9,066.02	2,101.03	11,167.05
Commercial Lands			
Mixed Residential / Commercial	564.28	17.42	581.69
Commercial	2,050.20	34.42	2,084.62
Subtotal	2,614.48	51.83	2,666.31
Industrial Lands			
Industrial	7,768.43	1,669.12	9,437.55
Subtotal	7,768.43	1,669.12	9,437.55

Land Use Designations	City Limits	UGA	Total
Public / Quasi-Public Lands			
Gov't Public / Quasi-Public	837.71	87.53	925.23
Subtotal	837.71	87.53	925.23
Open Space / Park Lands			
Open Space / Park	950.24	61.37	1,011.61
Subtotal	950.24	61.37	1,011.61
Total Land Area	21,236.87	3,970.89	25,207.76¹

Notes:

1. Total land area includes approximately 4,300 acres of street right of way

Source: City of Pasco Draft Comprehensive Plan (2020)

2.3.2. Alternative 2: Traditional Growth Target

This alternative allows for changes in the Plan to accommodate the 20-year population growth projection for Pasco allocated by the OFM. In this alternative, growth would occur based on the past trends, which could include some development within the undeveloped and infill areas of the City along with an expansion of the Urban Growth Area north of the City to accommodate future growth. This alternative considers land use and policy changes in order to maintain consistency with the GMA and the Countywide Planning Policies, and to accommodate growth. In this alternative, the Broadmoor area will develop under the current land use and traditional growth pattern.

This alternative will add approximately 5000 acres in the area north of the City as shown in Figure 2-2 and Table 4. It should be noted that the land designated industrial in the UGA associated with this alternative is currently designated as industrial by Franklin County. This area is currently part of a County-designated Limited Area of More Intense Rural Development or LAMIRD.

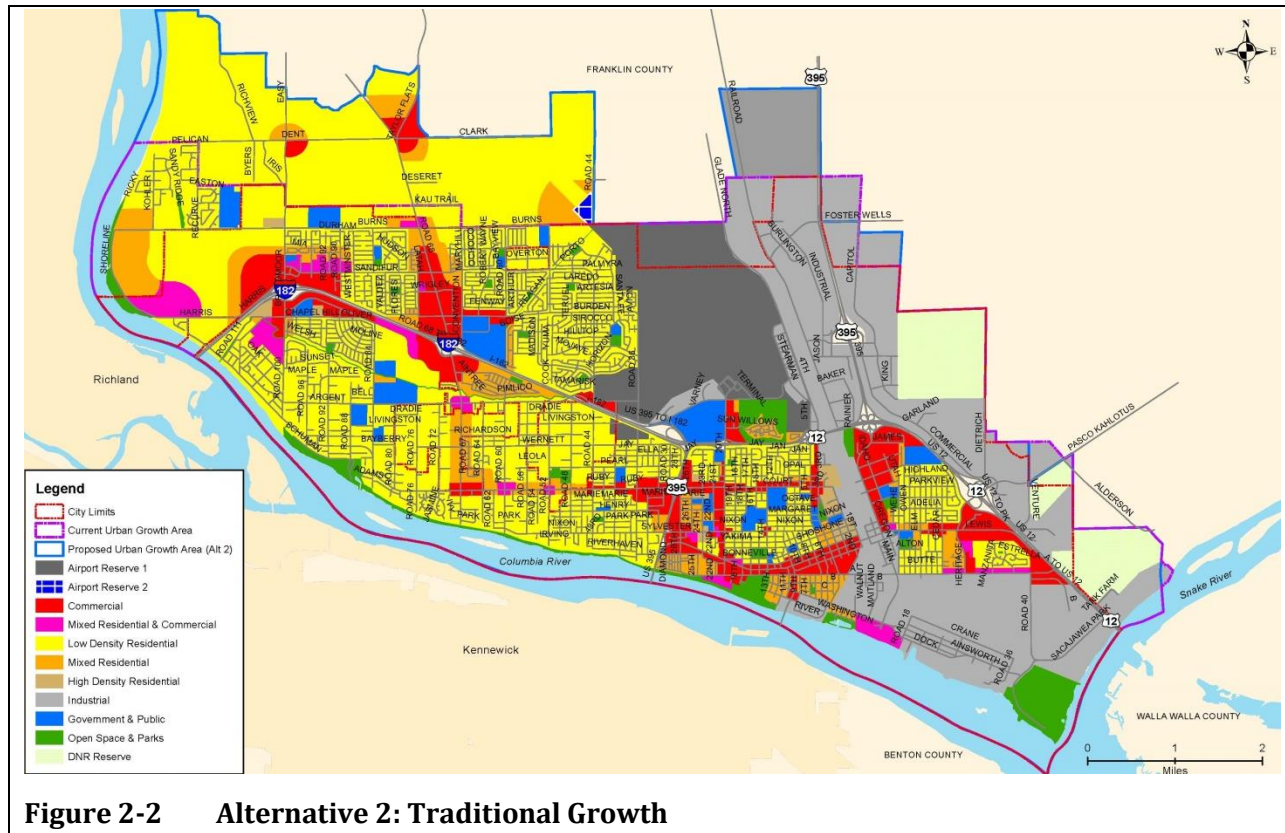
Table 4

Proposed UGA Area Alternative #2

Land Use	Area (Acres)
Low Density Residential	3,622
Mixed Residential (Mixed Density)	278.00
Mixed Residential & Commercial	3.00
Commercial	119.00
Industrial	810.00
Airport Reserve	33.00
Total	4,864

Table 5
Land Use in Alternative #2

Land Use Designations	City Limits	UGA (Existing and Proposed)	Total
Residential Lands			
Low Density	7,624.78	5,287.81	12,912.59
Medium Density	1,247.12	708.58	1,955.70
High Density	188.59		188.59
Subtotal	9,060.49	5,996.39	15,056.89
Commercial Lands			
Mixed Residential / Commercial	564.50	17.45	581.95
Commercial	2050.00	152.31	2,202.51
Subtotal	2,614.70	169.76	2,784.46
Industrial Lands			
Industrial	5,106.88	1,645.86	6,752.74
Subtotal	5,106.88	1,645.86	6,752.74
Public / Quasi-Public Lands			
Gov't Public / Quasi-Public	840.00	74.27	914.27
Subtotal	840.00	74.27	914.27
Open Space / Park Lands			
Open Space / Park	938.16	73.82	1,011.98
Subtotal	938.16	73.82	1,011.98
Airport Reserve Lands			
Airport Reserve	1,919.32	384.67	2,303.99
Subtotal	1,919.32	384.67	2,303.99
DNR Reserve Lands			
DNR Reserve	764.54	469.50	1,234.04
Subtotal	764.54	469.50	1,234.04
Area Total	21,244.09	8,814.65	30,058.37



2.3.3. Alternative 3: Compact Growth Target, Preferred Alternative

This alternative allows for changes in the Plan to accommodate the 20-year population growth projection for Pasco allocated by the 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. In this alternative, the Broadmoor area will develop under a higher density growth pattern.

This alternative will add approximately 3500 acres in the area north of the City as shown in Figure 2-3, and Table 6. Table 7 summarizes land use under Alternative 3. Like Alternative 2, the land designated industrial in the UGA associated with this alternative is currently designated as industrial by Franklin County.

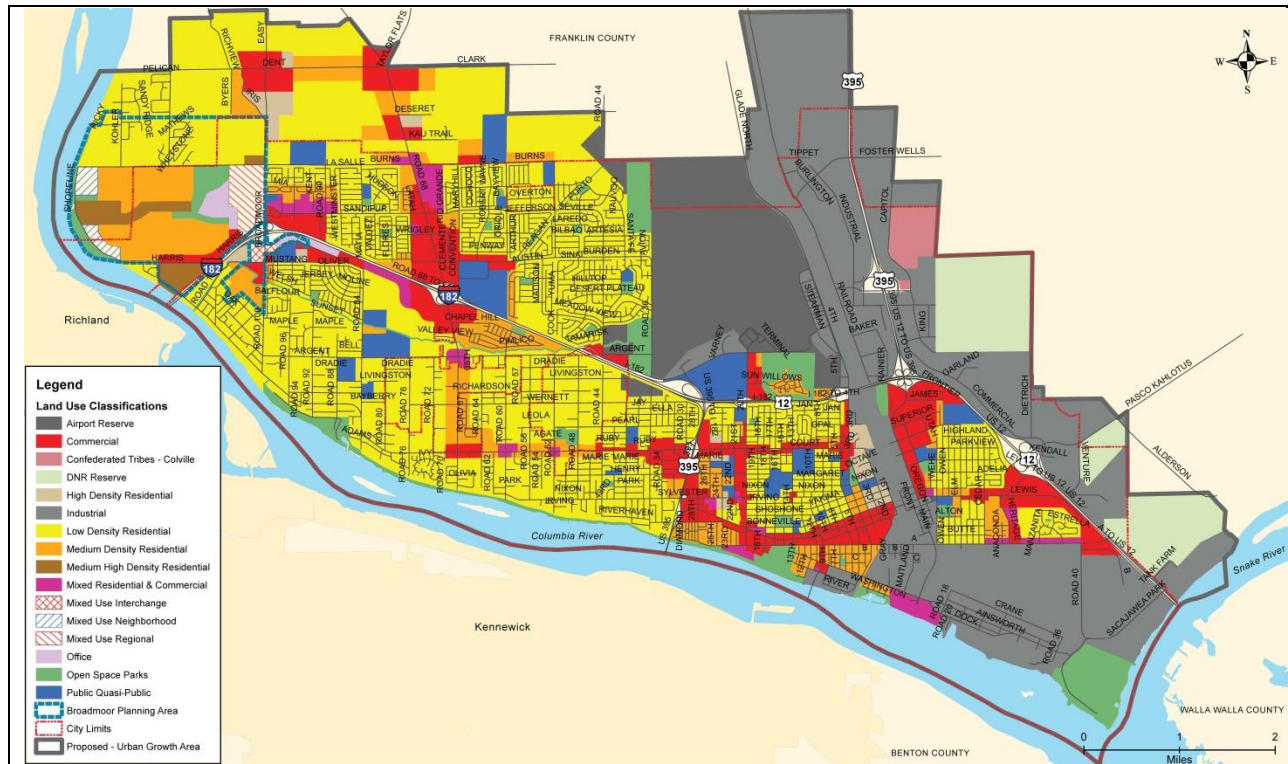


Figure 2-3 Alternative 3: Compact Growth - Preferred Alternative

Table 6
Proposed Land Use in the UGA Expansion Area

Land Use	Land (acres)
Low Density Residential ¹	1,758
Medium Density Residential	351
High Density Residential	122
Commercial	336 ²
Industrial	766
Public / Quasi-Public	82
Airport Reserve	33
Total	3,448

1. About 40 acres of parks, 160 acres of land for school facilities and additional public lands are included in the Low Density Residential land use acres. Locations to be identified at a later phase with the land use changes.

2. Additional commercial lands is assumed to be available through redevelopment on existing corridors over time

Table 7
Land Use in Alternative 3

Land Use Designations	City Limits	UGA (Existing and Proposed)	Total
Residential Lands			
Low Density	7,124.34	3,478.35	10,502.69
Medium Density	1,590.53	628.34	2,218.87
Medium-High Density	60.77	162.96	223.73
High Density	171.25	122.40	293.65
Subtotal	8,946.89	4,392.05	13,338.94
Commercial Lands			
Mixed Residential / Commercial	422.21	12.31	434.52
Commercial	1,866.63	370	2,236.83
Mixed Use Interchange	26.35	—	26.35
Mixed Use Neighborhood	20.60	56.82	77.42
Mixed Use Regional	147.96	—	147.96
Office	104.01	—	104.01
Subtotal	2,587.76	439.34	3,027.10
Industrial Lands			
Industrial	4,938.47	1,606.04	6,544.51
Subtotal	4,938.47	1,606.04	6,544.51
Public / Quasi-Public Lands			
Gov't Public / Quasi-Public	850.96	82.17	933.13
Subtotal	850.96	82.17	933.13
Open Space / Park Lands			
Open Space / Park	1,251.07	70.39	1,321.46
Subtotal	1,251.07	70.39	1,321.46
Airport Reserve Lands			
Airport Reserve	1,708.75	382.39	2,091.14
Subtotal	1,708.75	382.39	2,091.14
DNR Reserve Lands			
DNR Reserve	764.04	468.85	1,232.89
Subtotal	764.04	468.85	1,232.89
Confederated Tribes of the Colville Reservation			
Confederated Tribes of the Colville Reservation	188.00		188.00
Area Total	21,235.93	7,359.05	28,677.16

Chapter 3. Major Issues and Summary of Environmental Impacts

3.1. Major Issues and Areas

3.1.1. Increased Density and Development

Densities will be increased under the preferred alternative, which may significantly impact the built environment of the City, especially in the Broadmoor area to the northwest 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.

Some of the areas in the existing UGA, especially the Riverview area, located between the Franklin County Irrigation District (FCID) Canal and the Columbia River would most likely retain similar densities for a longer timeframe. The creation of odd shaped lots and the placement of buildings in locations where future streets need to be extended, and the lack of sewer service all create challenges for future development. In addition, the Department of Archaeology and Historic Preservation is recommending cultural surveys be conducted for development proposals in this area that will add to development costs and time.

Future development under both action alternatives will change the character of the primarily undeveloped areas of the City and the unincorporated areas in the County currently proposed for UGA expansion. Alternative 3 will have a variety of housing styles, including cluster and multi-family housing, requiring less expansion of the UGA. Therefore, will impact less area in the unincorporated part of the County.

In the responses to the scoping notice and in meetings, the Pasco community has largely expressed support for higher density development and a variety of housing choices.

3.1.2. Traffic

The additional traffic generated by the increased housing densities, and commercial, and public facilities land uses could impact existing traffic pattern. Both action alternatives would result in a substantial increase in traffic volume, although proposed mitigation could reduce transportation impacts sufficiently under Alternative 3 to meet the City's current Level-of-Service requirements. Additionally, the Broadmoor area in both alternatives will retain some traffic internally due to the increase of a mix of land uses.

Traffic within the Broadmoor area and in the proposed expanded UGA area is anticipated to significantly increase in Alternative 3. However, a portion of this traffic is expected to be contained internally due to the combination of businesses and housing opportunities planned in the same area. Alternative 2 will have an increased vehicular movement due to the UGA area consisting mostly of residential land uses, with residential traffic travelling to the work areas both within and outside of Pasco in the greater Tri-Cities area, along with travel to commercial areas throughout the City.

The major facilities that will be affected by the forecasted growth in the City of Pasco under all alternatives are I-182 as well as Road 68 and Road 100/Broadmoor Blvd, both of which provide the only access at interchanges with I-182 in the western portion of the City where much of the growth is forecast to occur.

3.1.3. Open Space and Natural Areas

Open space and natural areas are located along the extensive shoreline areas of the City, industrial areas on the eastern side of the town, around the Pasco airport and near the Broadmoor area. Habitats in these areas include wetlands, sand dunes, shrub-steppe habitat and riparian areas, in varying levels of function. Many open space areas are also disturbed with non-native vegetation on them. The City's existing environmental protection regulations, including Pasco Municipal Code (PMC) Titles 28 (Critical Areas) and 29 (Shoreline Master Program) designed to protect wetlands, fish and wildlife habitats, and other critical area functions and values. Additionally, state and federal regulations also guide the preservation of cultural resources in this area.

3.1.4. Healthy Community

As the growth occurs in the City, there has been concern about the planning for a walkable, bike-friendly and a more active community that promotes a healthy lifestyle. 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. Both alternatives' goals and policies include streetscape and traffic improvement, along with pedestrian- and bike-friendly options. Land use in the proposed UGA area in the Preferred Alternative 3 includes a mix of residential, commercial, park, and public facilities land uses that would promote live and work environments, increase physical activities and encourage multi-modal travel options. The UGA area in Alternative 2 will include a minimal mix of uses. With predominantly low-density residential land use in the UGA area, Alternative 2 will mostly remain as an auto-oriented community.

3.2. Comparison of Alternatives to GMA Goals

Table 8

Summary of Alternatives Compared to GMA Goals

Goals	Alternative 1: No Action	Alternative 2	Alternative 3
Urban Growth: Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.	<ul style="list-style-type: none">• Would accommodate the least amount of future growth in the City.• Dispersed future growth throughout the city and low rise pattern.	<ul style="list-style-type: none">• Focused growth within the UGA.	<ul style="list-style-type: none">• Focused growth within the UGA with higher density and infill.
Reduce Sprawl: Reduce inappropriate conversion of undeveloped land into sprawling, low-density development.	<ul style="list-style-type: none">• Dispersed and low-rise development pattern, would exceed the UGA to accommodate growth increasing sprawl.	<ul style="list-style-type: none">• Growth within the UGA, but suburban nature of development will result in sprawl.	<ul style="list-style-type: none">• Growth within the UGA, planned areas would reduce sprawl.

Goals	Alternative 1: No Action	Alternative 2	Alternative 3
<p>Transportation: Encourage efficient multi-modal transportation systems based on regional priorities and coordinated with the City Plan.</p>	<ul style="list-style-type: none"> • Retains current • Transportation plans with limited improvements. 	<ul style="list-style-type: none"> • Adds new transportation improvements to improve connectivity and street design that supports urban environment. 	<ul style="list-style-type: none"> • Adds new transportation improvements to improve connectivity and street design that supports urban environment. • Adds multi-modal travel options • Could result in shorter trips due to more compact development patterns and could also lead to more kids walking to school.
<p>Housing: Encourage the availability of affordable housing to all economic segments of the population, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.</p>	<ul style="list-style-type: none"> • Housing not adequate to meet the 20-year demand. Disbursed and low rise pattern of housing development. 	<ul style="list-style-type: none"> • Housing meets the 20-year demand with limited housing types. 	<ul style="list-style-type: none"> • Housing meets the 20-year demand with a variety of housing types and residential densities.

Goals	Alternative 1: No Action	Alternative 2	Alternative 3
<p>Economic Development: Encourage economic development consistent with adopted Plans, promote economic opportunity for all citizens, especially for the unemployed and the disadvantaged, and encourage growth in areas experiencing insufficient economic growth, all within the capacity of the state's natural resources, public services and public facilities.</p>	<ul style="list-style-type: none"> • Current economic development trends continue. • Employment to occur in the existing commercial and industrial areas. 	<ul style="list-style-type: none"> • Economic opportunities are identified in the plan. • Some employment will occur in the limited commercial areas. 	<ul style="list-style-type: none"> • Economic opportunities are identified in the plan. • Additional commercial and mixed-use areas will accommodate more employment. • Results in less land conversion than Alternative 2, maintaining existing agricultural production, and associated economic benefits

Goals	Alternative 1: No Action	Alternative 2	Alternative 3
<p>Open Space and Recreation: Encourage the retention of open space and development of recreation opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks.</p>	<ul style="list-style-type: none"> • Maintains existing parks and Natural Open Space. • Recreation opportunities will be provided based on the Parks and Recreation's adopted Level of Service. 	<ul style="list-style-type: none"> • Maintains existing parks and natural open space and adds additional park land to serve future growth. • Larger area of farmland (not Ag land of long-term commercial significance) and rural land to be changed to various uses in the UGA over time. Agricultural and rural lands to remain in production until the time of development. Parks and recreational open spaces will be provided to serve in future, as development occurs. 	<ul style="list-style-type: none"> • Maintains existing parks and natural open space and adds additional park land to serve future growth. • A smaller growth area "footprint" changing land use from farmland (not Ag land of long-term commercial significance) and rural land to various uses in the UGA over time. Agricultural and rural lands to remain in production until the time of development. Will maintain more open space than Alternative 2.

Goals	Alternative 1: No Action	Alternative 2	Alternative 3
<p>Environment: Protect the environment and enhance the City's high quality of life, including air and water quality, and the availability of water.</p>	<ul style="list-style-type: none"> Environmental qualities are protected based on the current regulations and development pattern. A sprawl type growth will involve more land for development, resulting in higher vehicular traffic that could negatively impact the air quality. 	<ul style="list-style-type: none"> Environmental qualities are protected based on the current regulations and development pattern. A low density growth pattern will involve more land for development, more farmland (not Ag land of long term commercial significance) and rural land to be changed to various uses in the UGA, resulting in higher vehicular traffic that could negatively impact the air quality. 	<ul style="list-style-type: none"> Environmental qualities are protected based on the current regulations and development pattern. A higher density development will involve less land, reduce vehicular traffic, and will reduce impact to air quality and ozone. A smaller growth area "footprint" will maintain more open space than Alternative
<p>Public Facilities and Service. Adequate public facilities to serve the development.</p>	<ul style="list-style-type: none"> Public facilities continue to serve the current development pattern. 	<ul style="list-style-type: none"> Additional public facilities will be required in certain areas for urban development. 	<ul style="list-style-type: none"> Additional public facilities will be required in certain areas for urban development. Public facilities will be more efficient due to the more densely planned development pattern.

Goals	Alternative 1: No Action	Alternative 2	Alternative 3
<p>Historic Preservation. Identify and encourage the preservation of lands, sites and structures that have historical or archaeological significance.</p>	<ul style="list-style-type: none"> Historical or archaeologically significant sites or structures are protected under the current regulations during construction phase. 	<ul style="list-style-type: none"> Historical or archaeologically significant sites or structures are protected in the planning phase, and also under the current regulations during construction phase. 	<ul style="list-style-type: none"> Historical or archaeologically significant sites or structures are protected in the planning phase, and also under the current regulations during construction phase.

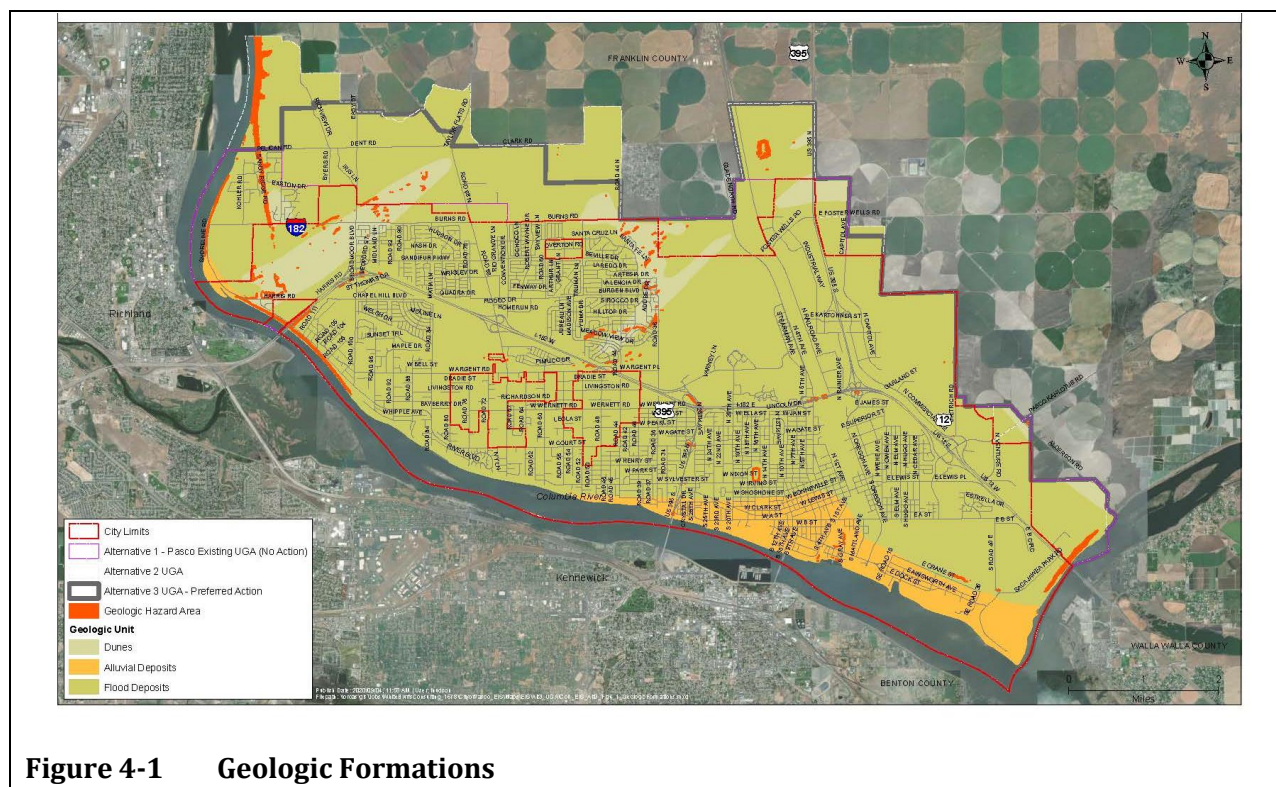
Chapter 4. Affected Environment, Impacts, and Mitigation Measures

4.1. Earth

4.1.1. Affected Environment

The geology, soils, and topography of the City area are primarily dictated by glacial outburst flooding that occurred near the end of the last major glacial period, approximately 18,000 to 20,000 years ago. This event is referred to as the Missoula Floods. The geologic makeup is the result of erosion of pre-flood geologic units, deposition of sediments carried by the floodwaters, and the formation of the unique topographic features that influence present-day hydrology. Prior to the Missoula Floods, the geology of Franklin County consisted primarily of Miocene-aged Columbia River Basalt flows that were in some places (e.g., plateaus) capped with varying thicknesses of wind-blown fine sands and silt known as loess (Grolier and Bingham 1978). The segments of the Columbia and Snake rivers around the City are located in a wide valley primarily comprising alluvial soils with relatively high infiltration rates. Within upland areas, particularly areas farther from the confluence of the rivers, outburst flood deposits of gravel occur as well. Figure 4-1 shows the geologic formations that occur near the City.

Geologically hazardous areas are defined as those lands susceptible to erosion, landslides, seismic, or mine hazard events. Surficial geology is shown on Figure 4-1 and summarized in Table 9.



Geologically hazardous areas are defined as those lands susceptible to erosion, landslides, seismic, or mine hazard events.

Table 9**Geologic Hazards of the City**

Hazard	Description	Summary	Source
Erosion	Soil units susceptible to erosion by wind, water, and unstable slopes	Some water erosion hazard areas exist along the Columbia River along with wind erosion hazard areas where sandy soils and dunes exist.	Soils – Water Erosion Hazards GIS Data (Franklin County)
Landslides	Steep Slopes underlain by weak, fine, and unstable geology	There are three areas in the City that have slopes greater than 15% underlain by alluvium or dune sand. No area in the City is mapped as an active landslide area.	Generalized Slope GIS Data (Franklin County), Surface Geology Polygon, 1: 100,000 Scale (WDNR) Active Landslide Area GIS Data (Franklin County)
Seismic Hazards	Active faults and earthquake locations	There is no known fault exist in the City.	Active fold and fault GIS data layers (WDNR)
Mine Sites	Active (permitted) mine sites	One mine site is identified for sand or gravel. Underground mining practices are currently not taking place in Franklin County. There are no known inactive mines sites; however, if they exist, these areas may present slope hazards (see Comprehensive Plan Appendix A Mapfolio – Map CA-1).	Mining and Energy Resources GIS data (WDNR) 2004, 2010, 2011, and 2012
Liquefaction Susceptibility zone	Liquefaction Susceptibility zone under alluvium deposit	One liquefaction susceptibility zone is identified along the Columbia River (see Comprehensive Plan Appendix A Mapfolio – Map CA-1).	City critical areas data

Note:

WDNR = Washington Department of Natural Resources

4.1.2. Probable Environmental Impacts

Earth-related impacts would occur during development activities and operation that may cause any of the following disturbance mechanisms: clearing, grading, erosion and sedimentation, impervious area expansion, increased chemical contamination, or other site-disturbing activities. Such activities have the potential to increase erosion, compaction, or contamination of earth resources. Infill and new developments near the steep slope areas in all alternatives would impact the earth surface.

Alternative 1: No Action Alternative

The No Action Alternative would result in continued use of land under the existing Plan land use designations. Earth-related impacts under the No Action Alternative would scale with the intensity of future activities occurring within the City's infill areas, which are expected to be less intensive compared to future uses proposed under the two action alternatives. Future population growth would not be fully accommodated under the No Action Alternative and could potentially result in

increased and more diffuse impacts to earth resources from future sprawl-type development in other parts of the City and neighboring rural areas in the County.

Alternative 2: Traditional Growth Target

Alternative 2 proposes to allow development to occur within currently undeveloped and infill areas of the City and in the UGA. Compared to the No Action Alternative, disturbance mechanisms associated with more intensive development under Alternatives 2 and 3 would result in increased erosion, compaction, or contamination of earth resources within the planning areas.

Due to the maximum acreages occupied under this alternative, the extent of impacts to earth resources within the undeveloped or infill areas would be more in Alternative 2 than other two alternatives. A limited potential for earth slides or slope sloughing exists within the steeper sloped areas on the north side of the City within the Broadmoor area. Because of the fine sandy soils in most part of the planning area including the Broadmoor area and the northern part of the planning area, a potential does exist for siltation, particularly during construction. The Loess soils are windblown and extremely fine. Thus, these soils compact well but may be subject to some erosion. Because of the low rainfall in the Tri-Cities area, siltation from runoff after construction is not typically an issue. However, windblown siltation can impact surrounding areas if not watered during construction.

Alternative 2 proposes lower density land use designations than Alternative 3. Alternative 2 would accommodate more land and less density, potentially resulting in increased impacts to earth resources from future development in the planning area.

Alternative 3: Compact Growth Target, Preferred Alternative

Alternative 3 proposes to allow development to occur within currently undeveloped or infill areas of the City and in the UGA area. Compared to Alternative 2, Alternative 3 proposes denser residential development to occur in the northern portion of the City and in the Broadmoor areas indicated in Figure 2-3. Broadmoor area anticipates adding about 7,000 dwelling units in by the year 2038. In Alternative 3, the denser development would result in higher population density per acre and reduce the need for sprawl-type development in the City and nearby rural areas to accommodate future population growth. This would concentrate development to planning areas and potentially reduce impacts to earth resources in other areas compared to Alternatives 1 and 2. Compared to Alternative 2, this could reduce impacts from development to earth resources, including steep slopes.

4.1.3. Mitigation Measures

For Alternatives 2 and 3, the following mitigation measures should be employed to reduce siltation and slides:

- Maintain compliance with local air-quality agency requirements by watering exposed areas during construction.
- Avoid disturbing the steep slope area.
- Compact soils at densities appropriate for planned land uses.
- Provide vegetative cover or soil cement on exposed surfaces.
- Maintain Open Space land use and environment designations along the shoreline to protect shoreline functions.
- Construction should be staged so that the maximum amount of existing vegetation is left in place.

- Catch basins should be installed near storm drains

Other Mitigation Measures

The City has updated its Critical Areas Ordinance (CAO) and will reflect updates to the GMA and SMP at a state and local level. PMC Title 28 addresses geologic hazard areas that occur in the County and provides parameters for development in and near geologic hazard areas through regulatory, review, and permitting processes. It also provides the designation and classification of geologic hazard areas (PMC 28.32.020 and 28.32.030), determination (PMC 28.32.050), and detailed study requirements (PMC 28.32.060 and 28.32.070) for activities that occur in or near geologic hazard areas. Development that is consistent with the CAO would avoid, minimize, or mitigate potential impacts to earth resources under the three alternatives.

The current draft *City of Pasco Draft Comprehensive Plan* (City of Pasco 2020b) encourages consistency with the CAO and provides goals and policies related to natural resources, including protection goals for property and people near geologic hazard areas. The following goals and policies should be considered for future development:

- LU-7Goal: Safeguard and protect shorelands and critical lands within the urban area.

For consistency with the Plan, future urban design under Alternatives 2 and 3 should be sensitive to existing topography and landscaping and utilize design strategies and building techniques that minimize environmental impact, particularly near sensitive areas.

4.2. Surface and Groundwater

4.2.1. Affected Environment

The City of Pasco is located at the confluence of the Columbia and Snake rivers in southeastern Washington within Franklin County. The Columbia River is to the west and south of the City, and the Snake River is to the east. The study area includes relevant discussion of the contributing watersheds.

Damage from flooding along the Columbia River occurred in 1948 prior to the construction of the dam system. The flood stage for the Columbia River is 32.0 feet and is measured at the gage downstream of the Priest Rapids dam. During maintenance of the Priest Rapids Dam spillway in July of 2012, high outflows from the dam raised the river near flood stage in the Tri-Cities (KNDU 2012). The floodway boundary is shown in Figure 4-2. The flood stage for the Snake River is 20.0 feet and is measured at USGS gage #13334300 (Snake River near Anatone, Washington).

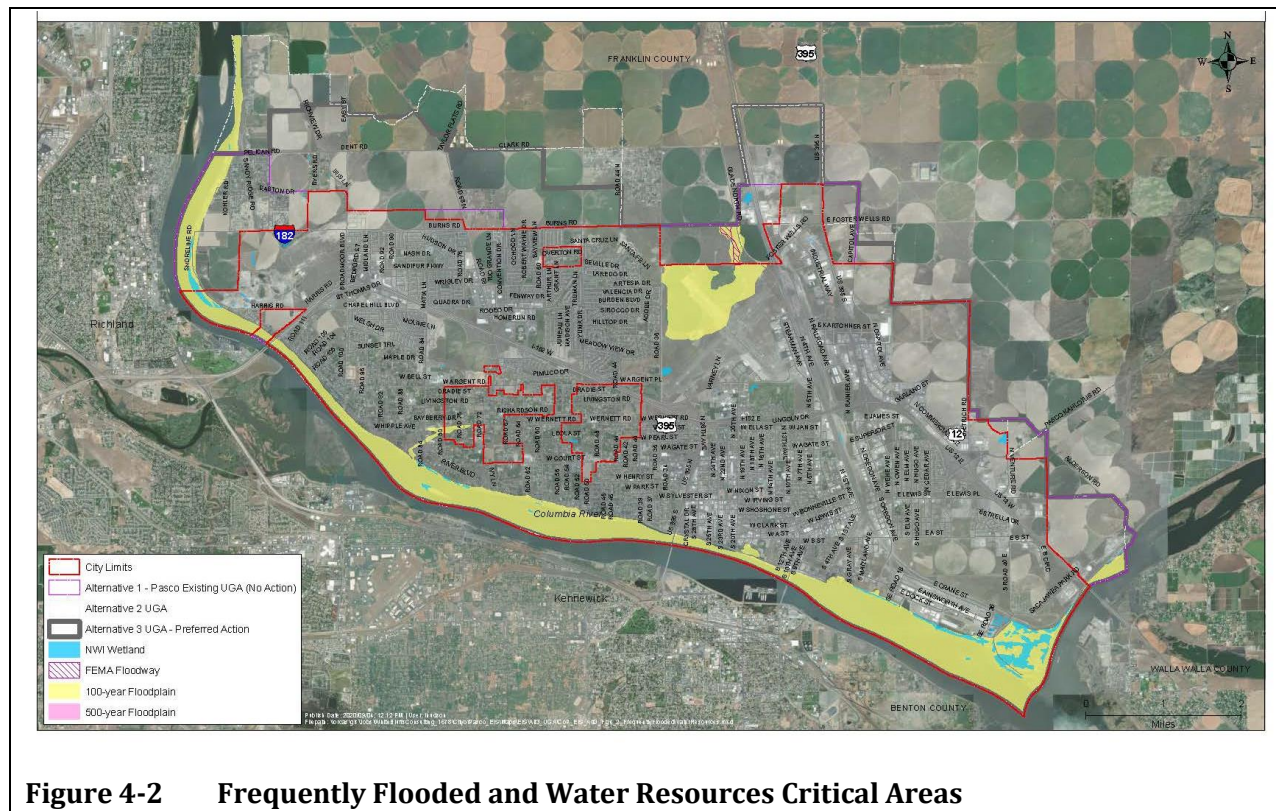


Figure 4-2 Frequently Flooded and Water Resources Critical Areas

The planning area is mostly located in the Esquatzel Coulee basin (Water Resource Inventory Area 36). A small area along the eastern boundary of the planning area is located in the lower Snake River basin (Water Resource Inventory Area 33). Major surface water resources are the Columbia River and Snake River.

Lake Wallula is the major surface water resource for the planning area. The portion of the Columbia and Snake rivers within the planning area is part of the upstream portion of Lake Wallula. The lake is created from the impoundment of the Columbia River by McNary Dam.

The Columbia River's active continuous USGS gage nearest to the planning area is gage #12514500 (Columbia River on Clover Island at Kennewick, Washington). The Columbia River at this gage drains 104,000 square miles. This gage is a water surface elevation gage and has records from Water Year 1988 to present. The water surface elevation at this gage ranges from 335 feet to 344 feet (NGVD 1929).

The closest Snake River historic USGS gage that measured streamflow near the City is gage #13353000 (Snake River below Ice Harbor Dam, Washington). The Snake River at this gage drains 108,500 square miles. It has records from Water Years 1913 to 2000.

Because the planning area is within the Lake Wallula portion of the Columbia and Snake rivers, water levels are generally stable. Floodplain levels are also confined due to river regulation.

The Columbia and Snake rivers are on the Ecology 303(d) list of impaired waters for temperature within the planning area. The Columbia River also has a total maximum daily load (TMDL) for total dissolved gas and is a 305(b) water of concern for pH. Additionally, the Snake River has TMDLs for dioxin and total dissolved gas, and it is a 305(b) water of concern for pH and dissolved oxygen.

Temperature and total dissolved gas are measured in the Columbia and Snake rivers at several gages as part of the Columbia River Data Access in Real Time (DART) program. The DART gage nearest to the planning area on the Columbia River is gage PAQW (Columbia River at Pasco, Washington). This gage has been in operation since 2000. The DART gage nearest to the planning area on the Snake River is gage IDSW (Ice Harbor Tailwater). This gage has been in operation since 2005.

The Columbia and Snake rivers are stable, confined, single-thread channels with low sinuosity and largely unvegetated depositional mid-channel islands and bars. The flooding risk is low in the Columbia and Snake rivers due to the levy and dam system maintained by the U.S. Army Corps of Engineers. Therefore, no Channel Migration Zone is present adjacent to the City.

Groundwater in the planning area is within the Columbia Plateau aquifer system, which consists of the Columbia River Basalt Group overlain by quaternary flood deposits. Groundwater in the planning area is hydraulically connected to surface water, so the amount of groundwater pumping affects surface water stream flow, and groundwater resources are recharged by surface water interaction. The estimated mean annual groundwater recharge in the planning area is up 2 inches (USGS 2011).

The City's water system is supplied from surface water withdrawals from the McNary Pool of the Columbia River. A portion of the Columbia River within the City is part of the upstream portion of Lake Wallula. Lake Wallula was created from the impoundment of the Columbia River by McNary Dam. Because the City is largely within the Lake Wallula portion of the Columbia River, water levels are generally stable within an operating elevation range as controlled at McNary Dam. Columbia River floodplain levels are also confined due to river regulation.

An irrigation system was originally established to serve farmlands in Pasco by the Franklin County Irrigation District No.1 (FCID). With the expansion of urban growth in West Pasco, the mission of the district has changed to that of an urban service provider as it provides irrigation water to more and more residential properties. The FCID pumps irrigation water from the Columbia River. Its main pumping station is located on the Columbia River near the intersection of Court Street and Road 111. The FCID maintains 36 miles of pipeline and 3.35 miles of canal.

The City currently holds surface water rights for 13,269.25 acre-feet of annual withdrawal and 20,149 gallons per minute (gpm) (29 mgd) of instantaneous withdrawal. As defined in the CWSP, the City is currently in compliance with water right quantities by borrowing the surplus from the Quad Cities water right, at a current consumption of 14,424 acre-feet by volume and 18,456 gpm instantaneous. The City also holds individual groundwater rights sourced by various wells for separate irrigation purposes. These existing water rights and access to future water sources are adequate to serve the areas in all the alternatives.

4.2.2. Probable Environmental Impacts

Impacts to surface water resources could occur from development activities that may cause erosion or increase impervious surfaces that could discharge contaminated or sediment-laden water to nearby surface waters. This point-source and non-point source pollution is a major sources of water quality impacts resulting from changes in development. Point-source and non-point source pollution can be exacerbated by development if not properly managed or mitigated (U.S. Environmental Protection Agency [USEPA] 2012). Additionally, increased impervious surface and erosion from construction and development could impact groundwater infiltration and increase the amount of impacted stormwater runoff into nearby surface waters and groundwater. Petroleum products from construction equipment could accidentally spill and contaminate the shallow aquifer. Stormwater is generally collected by storm drains and discharged to stormwater handling

facilities. Current state and City regulations require the inclusion of stormwater treatment facilities for projects that create significant new impervious surface area.

Developing currently undeveloped or infill areas that are irrigated could also change the stormwater recharge dynamics from new impervious surfaces, soil compaction, or other soil-disturbing activities. In the undeveloped condition, groundwater recharge would either return to streams as baseflow or recharge deeper portions of the underlying aquifer. Reducing groundwater recharge can result in lower water tables and reduced baseflow to streams, lakes, and wetlands. Additionally, expansion of the city's UGA and subsequent annexation and extension of sewer can limit the number of homes that are built with septic systems, which can benefit groundwater quality.

The same factors that impact groundwater and surface water quality and availability can also affect water supply. As described previously, changes in land use that reduce groundwater recharge have the potential to prevent precipitation from recharging groundwater aquifers. Additionally, changes in population can increase demand for water for public water supplies, domestic use, irrigation, industrial processing, energy production, or other needs. This can limit the availability of water supplies in various parts of the City, particularly during drought conditions.

Alternative 1: No Action Alternative

The No Action Alternative would result in continued use of land under the existing Plan land use designations. Surface water-related impacts under the No Action Alternative would scale with the intensity of future activities and population growth occurring within the planning areas as infill developments, which is expected to be less intensive compared to future uses proposed under the two action alternatives due to the limited land area in this alternative. Since the additional and projected future growth won't be occurring within the City limits, sprawled development will take place in the areas surrounding the City. These developments would most likely to occur on large lots in the County impacting surface waters outside the planning areas.

The rate of water supply demand would generally be proportionate to the rate of growth anticipated for each alternative. The impacts of Alternative 1 on water supply demand could be less with lower expected population growth and associated development, compared to the other alternatives.

Alternative 2: Traditional Growth Target

Alternatives 2 and 3 would provide the capacity to develop existing undeveloped or infill lands to accommodate future population growth.

The change in development patterns to the north under Alternatives 2 and 3 from irrigated and vacant to developed lands would also change groundwater and stormwater recharge dynamics from new impervious surfaces, soil compaction, or other soil-disturbing activities. This change would concentrate where stormwater recharges compared to existing conditions where rain currently falls and dispersed across agricultural fields and seeps into groundwater aquifers. Alternative 2 could have more impervious surface per capita due to the lower density development planned for this alternative, compared to Alternative 3

Without mitigation, surface waters within the City would be at greatest risk of degradation because of the expected development.

As described above, the rate of water supply demand would generally be proportionate to the rate of growth anticipated for each alternative. The impacts of Alternatives 2 and 3 on water supply

demand could be greater than the No Action Alternative due to higher expected population growth being planned for.

Alternative 3: Compact Growth Target, Preferred Alternative

Alternative 3 proposes to allow development to occur within currently undeveloped or infill areas of the City and in a smaller UGA area compared to Alternative 2. Alternative 3 proposes denser residential development to occur in the Broadmoor and UGA areas. Due to increased density and land area covered by Alternative 3, this alternative would increase new impervious surface area and development-related impacts to surface water within the planning areas. However, Alternative 3 would focus development within the City and could potentially result in decreased impacts to surface water recharge to groundwater from future development within the city infill and redevelopment areas, and in the reduced and higher density UGA area compared to Alternative 2.

4.2.3. Mitigation Measures

For Alternatives 2 and 3, the mitigation measures described in Section 4.1.3. for reducing impacts to earth resources should also be employed to reduce potential impacts to nearby surface waters and the underlying groundwater from erosion and runoff, and surface water infiltration. The following mitigation measures should also be employed:

- Under both development alternatives, detention ponds will reduce peak runoff flows to natural state conditions. Detention ponds will also provide settlement for silt. Oil/water separators can reduce impacts from automobiles.
- Additional mitigation measures include bio-filtration, either before or after entry into the various detention ponds, and buffers around wetlands and around wetlands in accordance with the CAO.
- Stormwater improvements are planned to manage stormwater and protect water quality.
- Evaluate and apply Low Impact Development (LID) stormwater techniques, where appropriate, to maintain dispersed groundwater infiltration.

Other Mitigation Measures

The current draft *City of Pasco Draft Comprehensive Plan (2020b)* goals and policies encourage the protection of critical areas, and management of storm water. Alternatives 2 and 3 should identify and regulate the use of wetlands, essential habitat areas, and other critical lands within and adjacent to the planning areas, in coordination with the appropriate agencies. The following goals and policies should be considered for future development:

- UT-3 Goal: Assure the provision of adequate and efficient storm water management.
- UT-3-A Policy: Require adequate provision of storm water facilities with all new land development
- UT-3-B Policy: Include adequate storm water management facilities to serve new or existing streets.

Proposed policies and regulations for the environmental protection of surface water and groundwater resources, and the protection of public health and safety from flood hazards, would apply, to minimize surface and groundwater quality impacts.

The City of Pasco 2020-2025 Capital Improvement Plan also identifies the priority projects. Improvements identified for the Water Treatment Plant, Process Water Reuse Facility, and Wastewater Treatment Plant. Water quality improvement features on the existing storm drainage

and water main system are also planned to be constructed. Water-capacity improvements are also planned throughout the City.

Existing federal, state, and county policies regulate land use activities near, and within, surface waters such as the Columbia and Snake rivers and wetlands. The City CAO in PMC 28.16, addresses and provides protections for the wetlands and provides parameters for development in and near these resources through regulatory, review, and permitting processes. Similarly, CAO in PMC 28.24, protects groundwater resources from hazardous substance and hazardous waste pollution by controlling or abating future pollution from new land uses or activities. Development that is consistent with the CAO would avoid, minimize, or mitigate potential impacts to earth resources under the three alternatives.

The following regulations and commitments are relevant to protecting County surface water resources:

- Federal National Pollutant Discharge Elimination System (NPDES) regulations as well as City stormwater regulations require stormwater quantity and quality controls. The City has adopted the Ecology Stormwater Management Manual for Eastern Washington (Ecology 2004).
- The U.S. Army Corps of Engineers (USACE) promotes wetland avoidance and regulates the filling of wetlands via Section 404 of the Clean Water Act of 1972.
- The City uses its SEPA authority in PMC 23.05 to require mitigation for impacts on drainage, habitat, and water quality and ensure mitigation is appropriate and sufficient.

4.3. Plants and Animals

4.3.1. Affected Environment

This section reviews plant species and habitat, and fish and wildlife. Washington Department of Fish and Wildlife (WDFW) has identified fish and wildlife resources that are a priority for management and conservation and maps areas where these habitats are known to occur through the Priority Habitats and Species (PHS) program (WDFW 2008). WDFW designation of priority habitat types is advisory only and carries no legal protection; although, such designation may increase the significance of impacts as evaluated through the SEPA process. WDFW does have authority over projects within the wetted perimeter of rivers, streams and lakes. Additionally, cities are required to designate and conserve priority species and habitats through their GMA critical areas regulations, as discussed further below. Figure 4-3 shows the extent of listed PHS occurrence within the City, including floodways, wetlands, and priority species and habitats, based on data and observations by the agency staff over the past several years. As can be seen with the underlying imagery, some of these lands have been developed for housing, agriculture or industrial uses since the species or habitats were identified. These maps provide a general guide for the environmental review process but site-specific permitting and studies should be conducted to verify and confirm what habitats and species exist at the time of the development. The City protects the habitats and associated plant and animal species through its Critical Areas code, PMC Title 28.

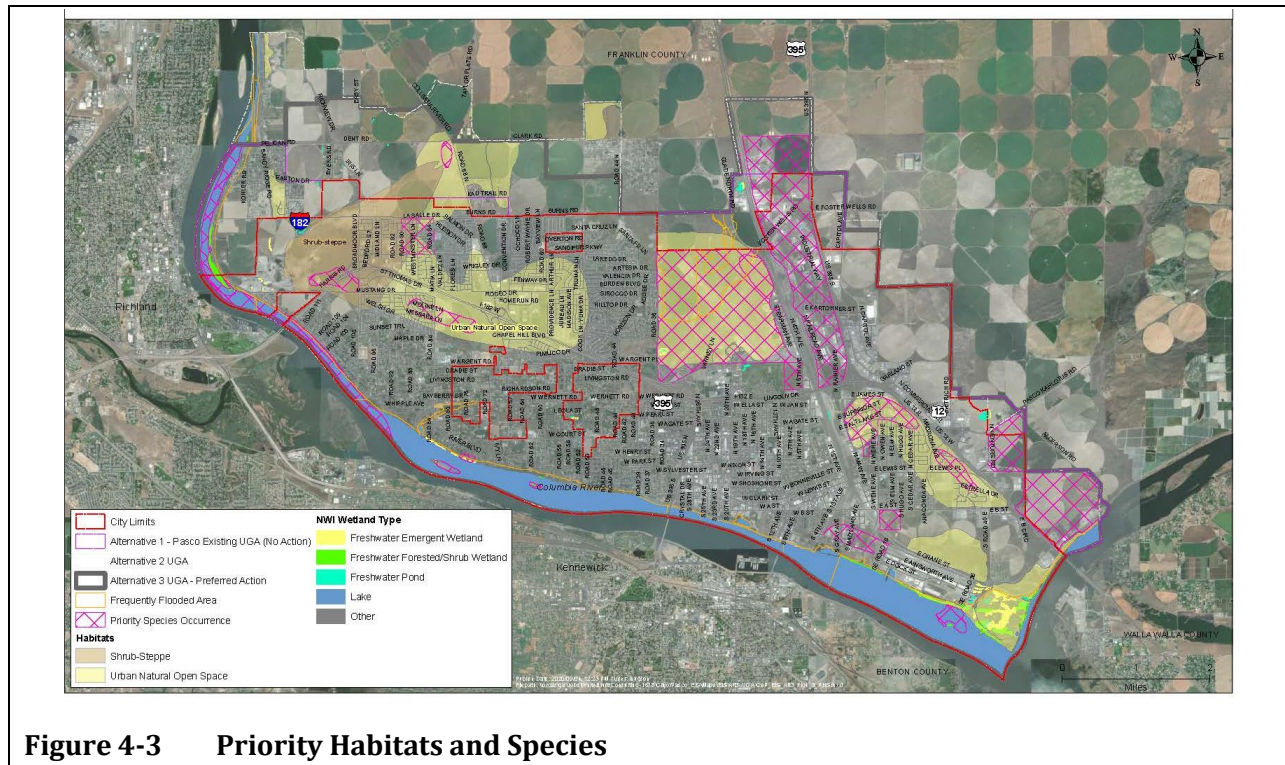


Figure 4-3 Priority Habitats and Species

Plants and Habitat

Shrub-steppe upland habitat is the largest native land cover type in Franklin County and is also found within the City as small remnant patches, primarily in the western and northern parts of the City and UGA areas. The shrub-steppe habitat in the city and UGA areas provides certain ecosystem services, including soil stabilization, wildfire moderation, and increased biodiversity in the few areas where native vegetation exists. Vegetation is primarily invasive species such as cheatgrass and Russian thistle, with pockets of sagebrush and native grasses. The displacement of shrub-steppe plant species by the invasive cheat-grass, Russian thistle, and other invasive species increases fire intensity and frequency, which, in addition to the hazards this creates for humans and wildlife, and also impacts shrub-steppe plant species such as big sagebrush, an important species for rare birds such as the sage grouse (Link et al. 2006).

In some areas, shrub-steppe habitat abuts or nearly abuts the shoreline, and there are small remnants of shrub-steppe habitat interspersed among the irrigated agricultural fields and industrial lands. Much of the remnant shrub-steppe habitat has been previously disturbed through grading, gravel mining, agriculture and off-road recreation vehicle activity, and the non-native grasses and weeds have taken over most of these areas.

Riparian areas are located along the shorelines of the City, with varying levels of structural diversity and productivity in terms of organic material, with reductions in diversity and productivity due to levees and upland developed areas. Habitat characteristics of healthy riparian areas include a connected corridor for fish and wildlife travel, vegetation types adapted to wetter soils, occasional flooding, and natural disturbance regimes. Riparian areas also offer important functions for species that inhabit the shrub- steppe, as well as species more limited in range to the riparian zone. For shrub-steppe species, they provide a critical water source and often a more productive environment for forage, escape, thermal cover, and nesting sites. For many species, they

provide critical winter habitat. Riparian areas typically support larger flocks and a greater density of upland birds than shrub-steppe habitat due to the greater production of biomass and the more complex mosaic of vegetation (Stinson and Schroeder 2012).

The removal of native riparian vegetation in riparian and shrub-steppe habitat, the introduction and proliferation of invasive plant species, like Russian Olive (*Elaeagnus angustifolia*), and the filling or degradation of wetlands along shorelines impact the organic inputs that fuel production of the lower levels of the food chain and, therefore, can have impacts throughout the entire food web. Organic matter produced by these habitats supports terrestrial and aquatic insects and other organisms that are then eaten themselves by birds, juvenile salmonids, and various fish species.

Fish and Wildlife Species

The Snake and Columbia rivers make up the border of the southern and eastern areas of the City and provide the shoreline aquatic habitat within the City. The aquatic habitat supports numerous resident and anadromous fish, aquatic invertebrates, and numerous migratory bird species.

Many ESA-listed anadromous salmonid species are found within the two rivers, including bull trout, steelhead, sockeye, and spring and fall Chinook salmon. Coho salmon are rare but may occur through reintroduction programs underway in the Yakima River Basin and this population segment is not ESA-listed. Pacific lamprey are present but have experienced population decline in recent years. Resident fish include a mix of native and non-native species, such as smallmouth and largemouth bass, northern pikeminnow, sculpin, mountain whitefish, sturgeon, catfish, sucker and other species.

The aquatic nearshore and riparian shoreline areas of the Columbia and Snake rivers near the City support concentrations of wintering migratory waterfowl, and primarily serve as resting and feeding areas for Canada goose and ducks. Some waterfowl nesting likely occurs in areas with wider riparian buffers, potentially near the confluence of the Snake and Columbia rivers and along reaches of the Columbia River where development is less intensive, such as residential zones, parks, and open spaces. The Columbia River in the vicinity of the City also provides a breeding area for long billed curlew and a variety of gulls, as well as a resting area with limited nesting for great blue heron and egret (USFWS 2008, 2012).

Some common species for shrub steppe habitat include sparrows, magpie, robins and various types of hawk species. State species listed as threatened or candidate species that can be associated with this habitat include Ferruginous hawk, Washington Ground Squirrel and burrowing owls. The entire Columbia Basin is a bird migration route for nearly 350 species of migratory birds (USFWS, May 5, 2011).

4.3.2. Probable Environmental Impacts

Under all three alternatives, development would continue to occur throughout the City and neighboring rural areas for urban uses and activities of varying intensity. Construction activities can cause noise and activity that can disturb wildlife or cause avoidance behavior. The effects of construction on nesting birds and other wildlife would depend on project-specific factors, including the timing of construction, background noise levels, and the type and duration of construction activities. Impacts to surface waters from increased impervious surface and erosion from development, as described in Section 4.2, can also impact fish and wildlife habitat. Fish breeding and rearing areas are particularly sensitive to siltation caused by erosion.

Development activities could have direct and indirect impacts on vegetation and habitat for listed- and non-listed species in the County, with direct impacts primarily involving the physical removal of vegetation and other habitat features. This can lead to impacts on riparian, wetland, and shrub-

steppe habitat. Development of currently vacant or underdeveloped parcels could lead to fragmentation of wildlife habitat, potentially further altering habitat connectivity, and potentially causing some species to migrate into remaining undeveloped areas. Indirect effects common to all alternatives could include a reduction in wildlife habitat quality and function because of increased human disturbance and associated factors in areas adjacent to wildlife habitat. Additionally, operational impacts include light from buildings, streetlamps, and vehicles, traffic noise, and other urban activities, causing sensitive wildlife species to avoid the area. Traffic would also continue to cause mortality to wildlife crossing roadways. These impacts would increase with the intensity of development and population growth.

Alternative 1: No Action Alternative

The No Action Alternative would result in continued use of land under the existing Plan land use designations. Impacts to plants and animals under the No Action Alternative would scale with the intensity of future activities and population growth occurring within the planning areas as infill developments which are expected to be less-intensive compared to future uses proposed under the two action alternatives due to the limited land area in this alternative.

Under Alternative 1, the least amount of development would occur as it has the least capacity to accommodate population growth of all alternatives and would be expected to have the least impact on plants and animals. However, population growth would not be accommodated under the No Action Alternative and could potentially result in increased and more diffuse impacts to plants and animals from future development in other parts of the City and neighboring rural areas. For example, sprawl developments in the northwest side of the City could potentially affect disturbed shrub-steppe habitat around agricultural and industrial lands. Development under this alternative would have very limited impact on wetlands or wetland buffers in the City, as these largely exist along the shorelines.

Alternative 2: Traditional Growth Target

Alternative 2 proposes to change land use designations to allow development to occur within currently undeveloped or infill areas of the City, and in the expanded UGA area to the north. Alternative 2 proposes lower density land use designations than Alternative 3. Under the 20-year population growth projection for the City, Alternative 2 would increase the buildable areas and developments resulting in greater impacts to plants and animals in those areas compared to Alternative 3.

The change in development patterns under Alternatives 2 and 3 from undeveloped and irrigated to developed lands would alter the landscape, potentially reducing habitat provided by open tracts of land. Although agriculture practices impact historical habitats with a more intensely managed landscape, they can provide pockets of semi-natural habitat among the more intensively cultivated ground.

Development under Alternatives 2 and 3 would have a very limited impact on wetlands or wetland buffers in the City, as these largely exist along the shorelines and are designated open space and protected from development under the City's Shoreline Master Program update. Wetlands provide habitat for species such as waterfowl, which are concentrated at the confluence of the Columbia and Snake rivers, and also provide water filtration and storage that improve water quality and temperatures for salmonid species.

Alternative 3: Compact Growth Target, Preferred Alternative

Alternative 3 proposes to change land use designations to allow development to occur within currently undeveloped or infill areas of the City and in the less expansive UGA area to the north.

Alternative 3 would focus development in these areas to a greater density than proposed in Alternative 2. Similar to Alternative 2, vegetation and wildlife habitat would be impacted within the planning areas. However, by focusing most development in these areas, fewer impacts on terrestrial plants and animals would occur outside of the planning areas than under Alternatives 1 and 2. In the Broadmoor area, Natural Open Space along the core PHS areas would be preserved. Compared to Alternative 2, this could reduce potential impacts to habitats and species from future development.

4.3.3. Mitigation Measures

For Alternatives 2 and 3, the following mitigation measures should be employed to reduce impacts to plants and animals:

- Provide erosion and stormwater control measures during construction, particularly in areas adjacent to surface waters that provide fish and wildlife habitat such as Columbia Point South.
- Consider landscaping with native plants to provide vegetation of habitat significance in streetscapes, buffers for stormwater swales, rain gardens, and other habitat features.
- Avoided, minimize, or mitigate impacts to shrub steppes, priority habitats, wetlands or wetland buffers, in accordance with the CAO and SMP.

All alternatives will provide shoreline and critical areas buffer along the Columbia and Snake rivers shoreline, providing fish and wildlife habitat protections from future development. In Alternative 3, Broadmoor area, designates wildlife mitigation area and corridor and protects them as open space. Alternative 3 would have less impact on shrub steppes due to the limited area it covers. Compared to Alternative 2, this would provide additional fish and wildlife habitat protections from future development.

Other Mitigation Measures

The *City of Pasco Draft Comprehensive Plan (2020b)* goals and policies encourage the protection of critical areas, including surface waters. Alternatives 2 and 3 should identify and regulate the use of essential habitat areas, and other critical lands within and adjacent to the planning areas, in coordination with the appropriate agencies. Public access opportunities to the shoreline and other natural features should be considered through integration with the City's trail system to the extent practicable. The following goals and policies should be considered for future development:

- LU-7 Goal: Safeguard and protect shorelands and critical lands within the urban area.
- LU-57-A Policy: Maintain regulatory processes to preserve wetlands, wildlife habitats, and other critical lands within the urban growth area.

The City CAO in PMC 28.20, addresses and provides protections for fish and wildlife habitat areas, including surface waters that provide habitat to native fish. Development that is consistent with the CAO would avoid, minimize, or mitigate potential impacts to earth resources under the three alternatives. The City uses its SEPA authority in PMC 23.05 to require mitigation for impacts on drainage, habitat, and water quality and ensure mitigation is appropriate and sufficient.

Mitigation measures may include:

- Reduce impervious surface area by evaluating, adopting and implementing applicable LID practices per the Stormwater Management Manual for Eastern Washington (Ecology 2004).
- Promote the preservation of on-site native vegetation, particularly riparian vegetation near surface waters and upland shrub-steppe communities.

- Publicize and encourage the preservation of native soils and protect the natural processes of soil maintenance and on-site hydrology. Leaving areas/tracts (“belts”) of native vegetation undisturbed in commercial and residential developments can be shown to provide long-term benefits regarding stormwater management, on-site “landscaping” maintenance, microclimate, and general aesthetics/sense of well-being in a developed landscape.
- Sponsor or encourage public education about the benefits of native vegetation.
- Promote LID, with emphasis on native plant retention in greenbelts between and within areas of proposed development to retain a portion of the wildlife habitat on the site and to preserve a measure of connectivity between areas of wildlife habitat.
- Encourage buffer enhancement. Where stream and/or wetland buffers to be left are in a degraded condition, encourage enhancement of the buffer through means such as establishment of native vegetation and control of non-native invasive plant species.

4.4. Land Use

4.4.1. Affected Environment

The City is part of the Tri-Cities Metropolitan Area in southeast Washington and includes 25,208 acres in the current incorporated City limits and UGA. The City is located at the southern edge of Franklin County, bounded by the Columbia River to the south and the Snake River to the southeast. The City is the major urban area within Franklin County. The City and its associated UGA comprise about 72% of the 55 square miles of designated UGA in Franklin County (Franklin County 2008).

The City includes a variety of land uses from residential, commercial, industrial and agriculture (primarily in the UGA alternative areas) to open space. The City’s land use designations and acreages within the City limits and UGA alternative areas are identified in the 2018 Comprehensive Plan. Residential land is the predominant use in the City limits and current UGA, containing over 44% of the City’s total land. Residential land use is followed by industrial land use, which consists of 24% of the total land use within the City. Commercial lands are distributed along the major corridors, City Center and along the Interstate-182. Open space land use is distributed throughout the City in the form of parks and natural open spaces. The shoreline areas consist of several parks, trails, and natural open space. See Table 10 for a summary of existing land use designations in the City limits and current UGA.

Table 10**Existing Comprehensive Plan Land Use Designations in the City Limits and UGA**

Land Use Designations	Acreage ¹	% of Total
Residential Lands	11,167	44%
Low Density		
Mixed Density		
High Density		
Commercial Lands	2,666	11%
Mixed Residential/Commercial		
Commercial		
Industrial Lands	5,968	37%
Public/Quasi-Public Lands	925	4%
Open Space / Park Lands	1,012	4%
Total	25,208	100%

Note:

1. The total includes approximately 4,300 acres of street right of way, which is about 17% of the total land area

The County land use designations of the proposed UGA areas in both alternatives include Agriculture, Ag Service Center – LAMIRD Type III, Rural Industrial – LAMIRD Type III, Rural Remote – LAMIRD Type I, and Rural Residential – LAMIRD Type I. Alternative 2 also includes Rural Shoreline Development – LAMIRD Type II. Within the proposed UGAs, agriculture lands are estimated at 3,250 acres in alternative 2, and 2,520 acres in alternative 3. Both alternatives 2 and 3 would impact existing lands under cultivation, however, none of the alternatives would affect Franklin County-designated agricultural lands of long-term commercial significance.

The proposed industrial land to the north in Alternatives 2 and 3 is currently classified as industrial by Franklin County (as a Limited Area of More Intensive Rural Development or "LAMIRD"). For this area, there is no net increase in the amount of land designated for industrial purposes; rather it is a jurisdictional change. Switching the land from industrial in the county to industrial in the city will serve the area with urban-level services.

Shoreline

Unlike the Citywide land use pattern, the City's shoreline is dominated by Open Space land use consisting of 60% of the total shoreline area. Industrial land use consists of over 25% of the shoreline. Much of the Open Space area is owned by the U.S. Army Corps of Engineers. Washington State Parks and Recreation Department also owns Open Space (Sacajawea State Park) within the shoreline. Other major public landowners include Port of Pasco and Washington State Department of Transportation. Industrial land along the shoreline is mostly owned by the Port of Pasco on the south and southeast sides of the City.

Residential uses are mostly concentrated on the south side of I-182. See Table 10 for a summary of land use within the shoreline jurisdiction.

Table 11**Existing Land Use within the City's Shoreline Jurisdiction**

Land Use Category	Acres in Shoreline	% of Land Use
Open Space	307.30	60.2%
Low Density Residential	68.24	13.3%
Mixed Residential	2.53	0.5%
Mixed Residential Commercial	2.38	0.5%
Industrial	130.21	25.5%
Commercial	0.02	0.0%
Total	510.68	100.0%

Source: Pasco Shoreline Master Program 2015

The City's proposed Comprehensive Plan land use categories and their purposes are discussed below.

- **Open Space/Nature** – This land use designation applies to areas where development will be severely restricted. Park lands, trails, and critical areas are examples of different types of open spaces.
- **Low Density Residential** – This land use allows residential development at a density of two to five dwelling units per acre. The land use designation criteria includes sewer availability or approval from the Benton-Franklin Health District when sewer is not available, suitability for home sites, and market demand.
- **Medium Density Residential** – This land use designation includes single-family dwellings, patio homes, townhouses, apartments, and condominiums at a density of 6 to 20 dwelling units per acre. This is designated to areas where the location is convenient to major circulation routes and it provides transition between more intense uses and low density uses. Availability of sewer services and market demand are also key criteria for this land use designation.
- **Medium High Density Residential** – This land use designation includes single-family dwelling units, townhouses, condominiums and multi-family; 8-15 dwelling units per acre. This is designated in Broadmoor area only.
- **High Density Residential** – This land use designation includes multi-family dwellings, apartments, and condominiums at a density of 21 dwelling units or more per acre. This is designated to areas where the location is convenient to major circulation routes and employment areas. Availability of sewer services and market demand are also key criteria for this land use designation.
- **Mixed Residential Commercial** – This land use designation is a mix of residential and commercial uses. Residential uses include single-family dwellings, patio homes, townhouses, apartments, and condominiums at a density of 5 to 29 dwelling units per acre. Commercial uses include neighborhood shopping and specialty centers, business parks, service, and office uses. This is designated to areas where the location is convenient to major circulation routes and land is suitable for heavy building sites.
- **Mixed Use Interchange** – This land use designation is to protect existing and future interchange efficiency from high traffic-generating uses that compound congestion and increase access conflicts.. This is designated along I-182 corridor in Broadmoor area only.

- **Mixed Use Neighborhood** – This land use designation is to provide a variety of residential options, and a mix of residential and commercial uses such as neighborhood grocer, drug stores, coffee shops in a pedestrian friendly environment. This is designated in Broadmoor area only.
- **Mixed Use Regional** – This land use designation is to provide a mix of residential and commercial uses in a pedestrian and transit friendly environment. This is designated in Broadmoor area only.
- **Office** – This land use designation is to provide a mix of professional office, personal services, and resource centers. This is designated in Broadmoor area only
- **Commercial** – This land use is designated for neighborhood, community and regional shopping and specialty centers, business parks, service, and office uses. This is designated to areas where the location is convenient to major circulation routes and land is suitable for heavy building sites.
- **Industrial** – This land use is designated for manufacturing, food processing, storage, and wholesale distribution of equipment and products, hazardous material storage, and transportation-related facilities.
- **Public and Quasi Public** - This land use is designated for schools, civic buildings, fire stations and other public uses.
- **Airport Reserve** - This land use is designated for lands owned or occupier by the Port of Pasco for Tri-Cities Airport.
- **DNR Reserve** - Transition lands owned and presently managed by DNR for natural resource production. Characteristics include, but are not limited to, proximity to urban-type development, road and utility infrastructure, and market demand..
- **Confederated Tribes – Colville Reservation** - This land use is designated for lands owned or occupier by Confederated Tribes of the Colville Reservation.

4.4.2. Probable Environmental Impacts

Future development resulting from adoption of the Plan update could convert undeveloped and infill areas to more intensive uses. Impacts associated with land use conversions could include construction-related and operational impacts. General land use impacts are likely to be associated with future population growth, increased development densities and aesthetic impacts associated with changed land use. Associated development activities would include increased noise, light and glare, and traffic delays; changes in views or the aesthetic character of the area; and increased pressure to develop or redevelop adjacent vacant or underutilized areas. Construction and operational noise is regulated by the PMC 9.130.030 – Public Disturbance Noise – Prohibited.

In all alternatives, infill lands would continue to be redeveloped under the existing land use designations. All alternatives would change the build environment as well as the aesthetics of the current conditions.

Alternative 1: No Action Alternative

The No Action Alternative would result in continued use of the properties as currently zoned by the City. Current land uses would continue to predominate, including residential and industrial uses. Future population growth would not be accommodated in the planning areas under the No Action Alternative and could potentially result in increased and more diffuse impacts to land use from future sprawl type development surrounding the City in the neighboring rural areas. The No Action Alternative will not result any short-term impacts to the aesthetic and visual quality of the planning

area. But in the long-term, when developments are permitted in the vacant and infill areas under the current land use and zoning, this will result in significant aesthetic and visual quality impacts.

Alternative 2: Traditional Growth Target

Under Alternatives 2 the land use from underutilized and vacant land in the UGA would change to a mix of Low, and Medium Density Residential, Commercial, industrial and Public Facility. Compared to the No Action Alternative, land use patterns would increase in intensity from the current land uses. Agricultural and other land uses will be transformed by future roadways, residential and commercial development, and light industrial activities with some green spaces. None of the alternatives would include Franklin County designated agricultural lands of long-term commercial significance. Also, under Alternatives 2 and 3, some of the limited current shrub-steppe topography will be removed to some extent to accommodate housing development and roadways, noting that for Alternative 3 in the Broadmoor area Natural Open Space along the core Priority Habitat Species (PHS) areas would be preserved, reducing potential impacts to habitats and species from future development.

New development and redevelopment would involve demolition of some existing structures, site preparation, infrastructure installation, and construction of new buildings. Such development and construction activities would affect surrounding land uses in terms of dust, construction traffic, and noise throughout the duration of the construction. Throughout the full buildout timeframe, these impacts would shift from one development location to another within the planning areas. Construction of infrastructure, housing, and business facilities is usually accompanied by temporary increases in noise and vibration due to the use of heavy equipment and hauling of construction materials. Noise impacts depend on the background sound levels, the type of construction equipment being used, and the amount of time it is in use. Operational noise (including construction-related noise) in the City is regulated by PMC 9.130.030, addressing public disturbance noise. Developments in Alternatives 2 and 3 would include an UGA area that falls within the Tri-Cities airport safety compatibility zone. Alternative 2 will include a larger area within the airport safety compatibility zone than Alternative 3.

Alternative 3: Compact Growth Target, Preferred Alternative

Compared to Alternative 2, Alternative 3 proposes denser residential development to occur in the northern portion of the City and in the Broadmoor area. Under Alternative 3, land use to the north would transform from underutilized, low intensity and current agricultural uses to a mix of Low, Medium, and High Density Residential, Commercial, Public Facility, and Open Space. Alternative 3 includes the highest density residential land use allocation.

Alternative 3 will have higher density and more concentrated development and less need for development in low-density land use designated areas compared to Alternative 2. The higher density will help the City to meet the 20-year population growth target. Both alternatives will reduce potential future impacts from development in the shoreline area.

4.4.3. Mitigation Measures

For Alternatives 2 and 3, the following mitigation measures should be employed to reduce impacts to land uses in and adjacent to the planning areas:

- Meet population growth targets and housing demand through developing planned areas, and infill developments.
- Improve the built environment through designing new structures and development per PMC.

- Reduce local traffic volumes by creating a live-work environment in Alternative 3
- Protect shoreline areas according to the City's shoreline regulations under Title 29
- Allow adequate parks, open space and public facilities
- Implement design standards for Broadmoor area (under development).
- Implement City's land use and zoning regulations to maintain the physical and aesthetic qualities of future developments.
- Maintain low density residential in the airport's fly zones. New aviation easement(s) will be in place near the airport with height restrictions per PMC 25.190 Airport Overlay District.
- Airport Overlay District (PMC 25.190) in the City and Franklin County (Chapter 17.76, Airport Zoning) codes - provide for safety, compatibility zones, use restrictions, and height limitations.
- Maintain land use compatibility to mitigate adverse impacts between different land uses (see Comprehensive Plan Volume II)
- Revised Alternative 3 further reduces the UGA area by 100 acres of agricultural land.

Other Mitigation Measures

The current draft *City of Pasco Draft Comprehensive Plan (2020b)* goals and policies are intended to plan for future population growth within the UGA while promoting compatible land uses and community objectives. The following goals and policies should be considered for future development under the three alternatives:

- LU-2. GOAL: Plan for a variety of compatible land uses within the urban growth area
- LU-2-A Policy: Maintain sufficient land designated to accommodate residential, commercial, industrial, educational and public facility uses proximate to appropriate transportation and utility infrastructure.
- LU-2-B Policy: Facilitate planned growth within the City limits and UGA, and also promote infill developments in the City limits.
- LU-2-C Policy: Ensure that adequate public services are provided in a reasonable time frame for new developments.
- LU-2-D Policy: Encourage the use of buffers or transition zones between non-compatible land uses.
- LU-2-E Policy: Discourage the siting of incompatible uses adjacent to Pasco airport.
- LU-3 Goal: Maintain established neighborhoods and ensure new neighborhoods are safe and enjoyable places to live.

The City of Pasco Zoning Regulations in PMC Title 25 regulate development in various zoning districts, and a zoning change could be made to further restrict the type and density of development in the planning area. Similarly, the City CAO in PMC Title 28, and Shoreline Regulations in Title 29 address and provide protections for critical areas and shorelines. Subdivision Regulations in Title 21 regulate and ensure appropriate land sub-divisions for developments to occur. Development that is consistent with these regulations would avoid, minimize, or mitigate potential impacts to land use under the three alternatives.

Another mitigation measure to consider is implementing rural land protection measures and incentives to make UGAs and planning areas more attractive (e.g., density incentives and

infrastructure investment), which could be applied to direct growth to urban areas under all alternatives.

4.5. Environmental Health

Environmental health addresses all the physical, chemical, and biological factors external to a person and related factors impacting behaviors.

4.5.1: Affected Environment

The City includes a variety of land uses from residential and commercial/industrial to open space. While the residential land is the predominant use in the City, it is followed by industrial land use. Commercial lands are distributed along the major corridors.

Future developments of infill and undeveloped commercial and industrial lands could impact environmental health. During construction and operation of some industrial developments, chemicals may be stored that could potentially create a risk of fire, explosion or spills. Additionally, within the existing City limits and within both UGA areas associated with alternatives 2 and 3 respectively, are in proximity to Superfund sites, facilities with Risk Management Plans (RMP), facilities that generate hazardous waste and Wastewater Discharge Indicator [Environmental Protection Agency (EPA) 2019].

4.5.2. Probable Environmental Impacts

Alternative 1: No Action Alternative

The No Action Alternative would result in continued use of the properties as currently zoned by the City. Current land uses would continue to dominate, including residential and industrial uses. Future population and employment growth would not be accommodated in the planning areas under the No Action Alternative and could potentially result in increased and intense use of industrial lands, as well as more diffuse impacts to land use from future sprawl type development surrounding the City in the neighboring rural areas. In the long-term, when developments are permitted in the vacant and infill areas under the current land use and zoning, this will result in continued risks to environmental health as seen by current development patterns.

Additionally, the EPA EJSCREEN (environmental justice screening) report generated for the City identifies that within the current city limits three factors are above the state average. Superfund proximity is rated in the 61st percentile; RMP Proximity in the 92nd percentile and Wastewater Discharge Indicator in 96th percentile. Hazardous waste proximity is below the state average at the 41st percentile (EPA 2019). Accordingly, additional growth that would occur within the existing City limits would continue risk exposure at the existing levels.

Alternative 2: Traditional Growth Target

Compared to the No Action Alternative, land use patterns would increase significantly in intensity from the current land uses. Vacant open land will be transformed by future roadways, residential and commercial development, and light industrial activities with some green spaces. Under Alternatives 2 and 3, existing County under-utilized industrial lands will be added to the UGA. Also, limited areas of agricultural land will be added in the industrial land use inventory.

New industrial developments could increase the exposure to chemicals or risk of fire. Hazardous waste could occur depending on the types of uses. However, most of these uses would have

happened within the County's industrial uses. In both alternatives 2 and 3, the industrial lands will be served with better utilities and safety system.

Open burning is not allowed within the UGA. Therefore, and expanded the UGA will limit the ability for existing and future residents in the subject area from being able to burn, which may lead to air quality enhancements.

The EPA EJSCREEN report generated for the two UGA areas identifies Superfund proximity increasing from 61 to the 62nd percentile when compared to the existing City limits; RMP Proximity reducing from 92 to the 91st percentile and Wastewater Discharge Indicator reducing from 96 to the 57th percentile. Hazardous waste proximity is below the state average for but increases from 41 to the 47th percentile (EPA 2019).

Alternative 3: Compact Growth Target, Preferred Alternative

Alternative 3 will have higher density and more concentrated development. Development impacts in the industrial areas will remain the similar in both Alternatives 2 with slightly less in 3. Because this alternative includes higher density and more concentrated development, both within the existing City limits and within the smaller UGA, risk exposures would be comparable both to the No Action and Alternative 2, for development within the City limits and the smaller UGA area respectively, as described above.

4.5.3. Mitigation Measures

For Alternatives 2 and 3, the following mitigation measures should be employed to reduce impacts to environmental health in and adjacent to the planning areas:

- Improve the built environment through designing new structures with safety and hazard maintenance per PMC.
- Maintain and employ emergency management plans for all existing industrial facilities and new industrial development.
- Support the preparation of Spill Prevention, Control, and Countermeasures Plans (SPCC) required for existing facilities and construction projects, along with timely spill or contamination emergency response measures.
- Support appropriate hazardous waste management through reuse, recycling, and disposal.
- Listed hazardous sites should be subject to ongoing monitoring by Ecology's Hazardous Waste and Toxic Reduction Program.

Other Mitigation Measures

The current draft *City of Pasco Draft Comprehensive Plan (2020b)* goals and policies are intended to plan for future population growth within the UGA while maintain the environment. The following goals and policies should be considered for future development under the three alternatives:

- CF-8-B Policy: Ensure all potential environmental impacts are considered for each essential public facility including the cumulative impacts of multiple facilities.
- ED-2 Goal: Assure appropriate location and design of commercial industrial facilities.

4.6 Air Quality/Greenhouse Gas

4.6.1. Affected Environment

The City of Pasco experiences air quality conditions similar to the rest of the Tri-Cities region. Typical air pollution sources include vehicle traffic and commercial and industrial businesses, releasing carbon monoxide (CO), volatile organic compounds (VOCs), and nitrogen dioxide (NO₂). Particulate matter is generated by industrial emissions, motor vehicle tailpipes, and fugitive dust from agricultural and open space lands, and roadways, including particulate matter less than or equal to 10 micrometers in size (PM₁₀) and particulate matter less than or equal to 2.5 micrometers in size (PM_{2.5}).

Ozone (O₃) is a highly reactive form of oxygen that is generated by an atmospheric chemical reaction with ozone precursors like nitrogen oxides and VOCs. Ozone concentrations in City of Pasco are being watched more closely after AIRPACT, a daily predictive air quality forecast model operated by Washington State University (WSU), consistently showed elevated ozone in the Tri-Cities area. It has been determined from ozone monitoring that began in 2013 that elevated ozone occurs in the summer months on hot days > 85 °F with light NNE winds (< 6 mph) (WSU 2017).

The highest ambient concentrations generally occur near the emissions sources, which would be from motor vehicle tailpipes driving on major roads. PM_{2.5} has a greater impact than PM₁₀ at locations far from the emitting source because it remains suspended in the atmosphere longer and travels farther.

Additionally, the EPA EJSCREEN report generated for the City and the UGA areas for the alternatives identifies that two parameters are well above the state average for air quality: PM_{2.5} and ozone are both above the 90th percentile. Within the current city limits the values are higher and they slightly decline farther north in the UGA alternative areas (EPA 2019).

Greenhouse Gas Emissions (GHG) are gases that, when present, absorb or reflect heat that normally would radiate away from the earth and thereby increases global temperature. GHGs typically include CO₂, methane, nitrous oxide, water vapor, ozone, and halocarbons. CO₂ is the individual constituent that is normally emitted in the greatest amount and generally contributes the most to climate change.

Two agencies have jurisdiction over ambient air quality in Franklin County: the U.S. Environmental Protection Agency (EPA) and Washington State Department of Ecology (Ecology).

4.6.2. Probable Environmental Impacts

Alternative 1: No Action Alternative

Under the No Action Alternative, current air quality regulations would continue to prevent new developments and commercial and industrial facilities from generating unacceptable air pollutant emissions that would affect nearby areas during construction or operation.

Population is expected to increase but not at the same levels within the City limits and UGA areas as expected with Alternatives 2 and 3, and there would be expansion of commercial and industrial space; therefore air pollutant emissions generated within the study area are expected to increase. Similarly, vehicle miles traveled for those who work in the City and its UGA would also increase, along with the tailpipe emissions generated by those vehicles.

During construction, dust from excavation and grading could cause temporary, localized increases in the ambient concentrations of fugitive dust and suspended particulate matter. Construction activity could cause localized fugitive dust impacts at homes and businesses near construction sites.

Construction activities would likely require the use of diesel-powered heavy trucks and smaller equipment, such as generators and compressors that could slightly degrade local air quality in the immediate vicinity of construction sites. However, these emissions would be temporary and localized.

Some construction activities could cause odors detectable to some people in the vicinity of construction activities, especially during paving operations using tar and asphalt. Such odors would be short-term and localized.

Future development is expected to increase traffic and add additional roadways. When a street is widened or extended, or a new road constructed, air emissions could be higher.

Localized CO impacts could occur at major intersections that experience significant traffic congestion. Additionally, tailpipe emissions from vehicles traveling on public streets are one of the largest sources of air pollutant emissions associated with the growth in the study area. However, ongoing EPA emission control requirements for on-road cars and trucks have dramatically improved per-vehicle tailpipe emission rates.

This beneficial trend is expected to continue into the future as drivers gradually replace old vehicles with new, cleaner-burning ones. As a result, the decrease in future per-vehicle emission rates would at least partially offset the likely increase compared to existing levels.

Additional air quality impacts are expected due to commercial and business operations. It is likely that new commercial development would occur near either current or future residential property. Stationary and mechanical equipment, and trucks at loading docks at retail buildings could cause air pollution issues at adjacent residential properties.

Accordingly, additional growth that would occur within the existing City limits would continue risk exposure at the slightly higher levels for PM_{2.5} (92nd percentile) and ozone (98th percentile) (EPA 2019).

Alternative 2: Traditional Growth Target

Alternative 2 air quality impacts are expected to be similar to those impacts identified in the No Action Alternative. Temporary construction impacts would likely be higher as construction activities are expected to be more concentrated in the northwest areas of the City and UGA Area for this alternative. Exposure to PM_{2.5} and ozone would initially be slightly lower than the No Action, as the UGA area for Alternative 2 is currently rated in the 91st percentile for PM_{2.5} and ozone is in the 95th percentile, but over time as development occurs and more population is located within the City and UGA area, then these values are expected to increase. Open burning is not allowed within the UGA. Expanding the UGA will limit the ability for existing and future residents in the subject area from being able to burn, which may lead to air quality enhancements.

Alternative 3: Compact Growth Target, Preferred Alternative

Alternative 3 air quality impacts are expected to be similar to those impacts identified in the No Action and Alternative 2. Temporary construction impacts would likely be higher as construction activities are expected to be more concentrated in the northwest areas of the City and UGA Area for this alternative, although more concentrated than Alternative 2. Exposure to PM_{2.5} and ozone would be similar to that described for Alternative 2. The exposure values could increase over time as growth occurs. Open burning restriction may lead air quality enhancements.

4.3.3. Mitigation Measures

For all the Alternatives, the following mitigation measures would be employed to reduce impacts.

- Reductions in traffic congestion through encouraging alternative modes of transportation such as transit and bicycles or walking may help offset any potential localized increase in emissions. Furthermore, on a regional basis, the EPA's vehicle and fuel regulations (coupled with ongoing future fleet turnover) should, over time, cause significant reductions in region-wide air quality levels. Ongoing EPA motor vehicle regulations have caused steady decreases in tailpipe emissions from individual vehicles, and it is possible that those continuing decreases from individual vehicles could offset the increase in vehicle traffic.
- Air quality regulations require construction contractors to take all reasonable steps to minimize fugitive dust emissions during construction. These required mitigation measures are designed to reduce localized impacts affecting homes and businesses adjacent to construction sites.
- Promote transit and other types of transportation that do not contribute to additional air emissions and reduce vehicle traffic.
- Support State and EPA efforts to reduce ozone levels during hot summer days where levels might increase due to limited wind.
- Continue to support hydropower electrical generation facilities in the region that do not contribute to greenhouse gas emissions.

No significant unavoidable adverse impacts on regional or local air quality are anticipated. Temporary, localized dust and odor impacts could occur during the construction activities. Existing regulations and other mitigation measures described above should be adequate to mitigate any adverse impacts anticipated to occur as a result of projected growth.

4.7. Shoreline Use

4.7.1. Affected Environment

The City of Pasco is located along the confluence of the Columbia and Snake rivers in southeastern Washington within Franklin County. The Columbia River is to the south of the City, and the Snake River is to the east. The affected area for this section includes all land currently within the shoreline jurisdiction for incorporated City and the City's unincorporated Urban Growth Area (UGA). The City's shoreline consists of various water-related and water-oriented uses.

The City's shoreline consists of water-related uses such as industrial and barge facilities along the Snake River and the Port of Pasco's industrial facilities along the Columbia River. Water-enjoyment uses include much of the park and open space areas along the shoreline that provides for recreational use, including beach and shoreline access, as well as aesthetic enjoyment of the shoreline on trail systems. The shoreline also contains fishing and passive recreation (e.g., bird watching) opportunities on multiple shoreline locations. Sacagawea State Park is located at the confluence of the Columbia and Snake Rivers and includes a bike and pedestrian trail that connects to the Sacagawea Heritage Trail providing public access to the shoreline area throughout most part of the City.

4.7.2. Probable Environmental Impacts

Increased population growth in the City, including growth in rural areas, has the potential to change shoreline uses. Shoreline areas often attract development due to the scenic values that they provide. Increased development in or adjacent to these areas may change the existing character or degrade the shoreline environment. Additionally, development could potentially alter surrounding land use patterns sufficiently to reduce the value of shoreline areas as recreational opportunities or wildlife habitat. The City's Shoreline Master Program (PMC Title 29) sets requirements for land uses, densities, setbacks, and open space for the 17 miles of river shoreline within the City.

Alternative 1: No Action Alternative

Under the No Action Alternative, impacts to the shoreline are anticipated to be similar to current development patterns. Future population growth would not be fully accommodated under the No Action Alternative and could potentially result in increased and more diffuse impacts to shoreline areas from future sprawl-type development surrounding the City in the neighboring rural areas. In these cases, development in shoreline areas would be required to comply with the SMP and other rules and regulations, and avoid or minimize potential impacts to the shoreline environment.

Alternative 2: Traditional Growth Target

Alternative 2 proposes to allow development to occur within currently undeveloped or infill areas of the City, primarily located outside of the shoreline. Directing development into these areas would minimize potential impacts sensitive shoreline environments in other parts of the City or nearby rural areas. Alternative 2 also expands development on the north side along the shoreline. Shoreline buffer within the planning area would alleviate pressure associated with shoreline development and maintain the existing public accesses. Both Alternatives 2 and 3 would protect the publicly owned open space along the Columbia River. Mixed use developments would occur in this alternative which will provide buffers and open space according to the shoreline regulations. Shoreline area that would be added within the City through annexations over time includes an additional 1.5 miles.

Alternative 3: Compact Growth Target, Preferred Alternative

Alternative 3 proposes to allow development to occur within currently undeveloped or infill areas of the City. Similar to Alternative 2, directing development into these areas would minimize potential impacts sensitive shoreline environments in other parts of the City or rural areas. Alternative 3, similar to Alternative 2, expands development on the north side along the shoreline. The land along the shoreline is less in this alternative compared to Alternative 2. Shoreline area that would be added through annexations over time includes an additional quarter of a mile.

4.7.3. Mitigation Measures

For Alternatives 2 and 3, the following mitigation measures should be employed to reduce impacts to shoreline:

- Provide a development buffer along the Columbia and Snake rivers shoreline using Open Space land use designation.
- All shoreline goals and policies, and regulations should be applied for future developments.
- No net loss of shoreline ecological functions as a result of new development shall be allowed, consistent with the provisions of the SMP.

Other Mitigation Measures

The current draft *City of Pasco Draft Comprehensive Plan* (2020b) considers Shoreline Master Program (SMP) goals and policies as part of the Comprehensive Plan goals and policies. These goals and policies encourage the protection, conservation, and restoration of natural areas, including the shoreline, as assets to the community. Alternatives 2 and 3 should identify and regulate the use of shorelines, in coordination with the appropriate agencies. The following goals and policies should be considered for future development:

- SMP Public Access Goal (1)(a): Promote, protect, and enhance physical and visual public access along the shoreline of the Columbia and Snake rivers. Increase the amount and diversity of public access along the shoreline consistent with private property rights, public safety, and the natural shoreline character.
- SMP Shoreline Uses and Modifications Goal (1)(a): Encourage shoreline development and uses that recognize the City's natural and cultural values and its unique aesthetic qualities offered by its variety of shoreline environments, including, but not limited to, reservoir-bounded river segments, flood protection levees, recreational and industrial developments, riverine wetlands, open views, and plentiful formal and informal public access.
- SMP Conservation Goal (1)(a): Protect the existing hydraulic, hydrologic, and habitat functions, as well as scenic and recreational values, of City's shorelines and the McNary Pool

The City of Pasco SMP establishes regulations to protect sensitive shoreline areas from the impacts associated with new development. Any development projects undertaken within the jurisdiction of the SMP would be required to undergo evaluation for consistency.

The City CAO and SMP addresses and provides protections for sensitive habitats, including the shoreline environment. Additionally, the City of Pasco Zoning Regulations in PMC Title 25 regulate development in various zoning districts, including the shoreline environment. Development that is consistent with these standards would avoid, minimize, or mitigate potential impacts to earth resources under the three alternatives.

4.8. Population, Housing, and Employment

4.8.1. Affected Environment

As discussed above, population estimates for the City in 2018 are 73,590 and in 2019 are 75,290. Based on 2018 numbers, it is estimated that 48,238 people will be added to the City's population in the next 20 years (Oneza & Associates, 2020). The 2017 American Community Survey (ACS) data indicate existing 21,653 housing units in Pasco (Table H-1 in Comprehensive Plan Volume II). About 70 percent of the housing units are owner-occupied, and 30 percent renter-occupied. About 73 percent of all housing units are single-family both attached and detached, and 18 percent are multi-family. Mobile homes constitute about 8 percent of the total housing stocks. Per the *City of Pasco Draft Comprehensive Plan Volume II*, using the average household size of 3.17 persons per unit, added population from the 2018 base population will require 15,217 housing units. Existing vacant buildable land is estimated to provide 9,581 units in a variety of housing types (e.g., single-family, multi-family, townhome, condominium); therefore, an additional 5,636 housing units will be required to meet the demand of future housing (Oneza & Associates 2020).

Much of Pasco's (and Franklin County's) economy is tied to transportation and agriculture. The agricultural economy of Pasco is mostly mass production, tied to domestic and global trade, and connected to international conglomerates. As this industry in and around Franklin County matures, additional support facilities which process and handle production plants will continue to be

needed. This has also led to more opportunities for year around employment, meaning that families are less likely to migrate during the winter months, and are settling in the area permanently. (Oneza & Associates 2020).

Pasco's economy is also tied to the economy of the Tri-Cities metro area. The Tri-Cities area is unique in that its employment base is dominated by a select number of large employers. Roughly one in five of estimated 116,000 jobs in the Benton and Franklin Counties are for large employment firms or agencies, with the top five ranging in type, including research and development, health services, engineering and construction, food processing, and education. The continued employment growth at the Department of Energy Hanford Nuclear Reservation, Pacific Northwest National Laboratory, Energy Northwest and the Office of River Protection will continue the growth of Pasco's population. This growth will not only attract new residents to Pasco, but also provide opportunities for our young population to remain in Pasco. Employment in the Tri-Cities region increased from 2006 to 2015 by more than 22,000 jobs, with an average annual growth rate of 2 percent. There are roughly 116,000 jobs in the region. All industries experienced positive employment growth by the end of the 10-year period. However, from 2011 to 2014 employment slightly declined as spending cuts at the Hanford Site impacted the entire regional economy. In Pasco, the expansion of its economy led to increasing industrial diversity, and although the economic downturn in 2008 did have an impact, food manufacturing, agriculture, private and public educational and healthcare services provided strong stability.

Additional information on population, housing, and employment can be found in the *City of Pasco Draft Comprehensive Plan Volume II* (Oneza & Associates, 2020).

Industrial lands and associated jobs are mostly located on the east side of the City. Other business-related jobs are dispersed throughout the City with major clusters near the City Center, and Road 68 and I-182 intersection areas.

4.8.2. Impacts

According to current trends, population is expected to grow under all three alternatives. Housing and employment growth are also expected and would be accommodated under each alternative, but at varying levels. Impacts to population, housing, and employment would occur from inadequate existing facilities or insufficient future development opportunities to accommodate growth. An increase in population will require more intensified commercial, business, and other public facilities than would be possible under current development and population conditions. An intensification of urban uses and densities will increase traffic congestion, park requirements, police and fire requirements, and other public service demands and fiscal impacts. Additional urban development could further tax the City's fiscal and public service resources, potentially leading to a dilution of the service levels or capabilities provided current residents. Additionally, inadequately located or designed urban infrastructure, including roads, parking lots, and other improvements that are not properly sited, could create stormwater runoff, erosion, and other environmental hazards affecting neighboring properties and public services. These impacts should be mitigated through consistency with the Plan and other planning documents to ensure compatible development.

Alternative 1: No Action Alternative

The No Action Alternative would result in continued use of the properties as currently zoned by the City. Future population growth would not be accommodated in the planning areas. Similar to the action alternatives, the No Action Alternative would increase housing or employment opportunities in the City but would not meet the demand for housing and employment based on future population

growth trends. The City is currently updating its development regulations which would have the potential to add additional densities. Based on permitted housing units, from 2014-2019, 10% of all units were duplexes/zero-lot-line. Under the No Action Alternative, updated regulations may result in an increase of the current capacity of housing types.

Alternative 2: Recommended Growth Target

Under Alternatives 2 and 3, the expanded land area will accommodate population growth, and provide housing and employment opportunities. Both alternatives would accommodate 15,217 housing units to meet the future needs. The addition of housing in these areas is expected to improve the City's economic vitality and support local businesses. Alternatives 2 and 3 would increase housing and employment opportunities in the City consistent with future population growth trends. The industrial area to the north along US-395 would provide the City with additional capacity for industrial developments to add more jobs. However, the uses that would increase population and employment levels, would include associated traffic, noise, air pollution, public service demands, and other issues related to increased development in urban environments. Alternative 2 would result in a traditional low-density growth predominant by single family homes in approximately 3,622 acres in the proposed UGA. Approximately 280 acres of additional mixed residential land will be added allowing single-family homes, patio homes, townhouses, apartments and condominiums at a density of 5 to 29 dwelling units per acre. Overall density in the proposed UGA will be 2.55 units/acre.

Similar to No Action Alternative, both Alternatives 2 and 3 will experience increased density as a result of updated development regulations. Based on permitted housing units, from 2014-2019, 10% of all units were duplexes/zero-lot-line. Under the No Action Alternative, updated regulations may result in an increase of the current capacity of housing types.

Alternative 3: Recommended Growth Target High Density, Preferred Alternative

Alternative 3 includes the highest density residential land use allocation and would accommodate additional future population growth and housing in an area smaller than the area proposed in Alternative 2. Higher density and proximity between housing and jobs could attract more employers and businesses. Alternative 3 would allow for more affordable housing opportunities in terms of variety of housing types such as single-family, townhomes, condominiums, and apartments. It would also create job opportunities in certain centers in close proximity to housing, creating a more walkable community than the traditional growth in Alternative 2. Approximately 1750 acres of low density residential land will be added in the proposed UGA. After deducting approximately 400 acres of land needed for public facilities and parks, about 1,350 acres will be available for low density residential development at a density of at a density of 2 to 5 dwelling units per acre. Approximately 350 acres of additional land will be added to the medium density land use inventory. This will allow small lot single-family dwellings, patio homes, townhouses, apartments, and condominiums at a density of 6 to 20 dwelling units per acre. Approximately 120 acres of additional land will be available for the high density residential developments, allowing multiple unit apartments or condominiums at a density 21 units per acre or more. Overall density in the proposed UGA will be 5.23 units/acre.

4.8.3. Mitigation Measures

For Alternatives 2 and 3, the *City of Pasco Draft Comprehensive Plan Volume II* (Oneza & Associates 2020) identifies the following mitigation measures should be employed to reduce impacts to population, housing, and employment:

- Implement SOMOS¹ Pasco economic development strategies.
- Development of agricultural industrial businesses
- Infrastructure development
- Train labor force
- Promote tourism
- Meet housing demand through developing existing planned areas, infill developments and development in the UGAs.

Other Mitigation Measures

The current draft *City of Pasco Draft Comprehensive Plan* (2020b) provides goals and policies to accommodate population trends, housing, and employment. The following goals and policies should be considered for future development:

- H-1. GOAL: Encourage housing for all economic segments of the City's population consistent with the local and regional market.
- H-1-A Policy: Allow for a full range of housing including single family homes, townhouses, condominiums, apartments, and manufactured housing, accessory dwelling units, zero lot line, planned unit developments etc. in areas as appropriate.
- H-2. GOAL: Preserve and maintain the existing housing stock for present and future residents.
- ED-1 Goal: Maintain economic development as an important and ongoing City initiative.
- ED-1-F Policy: Recognize that infrastructure, including transportation and utility planning are vital to economic development and attracting businesses.
- ED-2 Goal: Assure appropriate location and design of commercial and industrial facilities.
- ED-2-B Policy: Encourage development of a wide range of commercial and industrial uses strategically located to support local and regional needs.
- ED-3 Goal: Maintain development standards and design guidelines to ensure that commercial and industrial developments are good neighbors.
- ED-3-A Policy: Enhance compatibility of commercial and industrial development with residential and mixed-use neighborhoods through the use of landscaping, screening, and superior building design standards and guidelines.

The GMA requires jurisdictions to allocate population growth to cities when feasible. Housing and employment are maintained and updated by the City as part of required Plan updates.

¹ Somos means "we are." Somos Pasco is a community wide effort to discuss the future of the Pasco community. It is a collaboration of the City, Port of Pasco, Franklin County, the Pasco School District, Columbia Basin College and the Hispanic and other groups.

To accommodate future population growth, the City should consider infill incentives and upzones. Other rural land protection measures and incentives make UGAs more attractive through infrastructure investment and infill incentives.

4.9. Parks and Recreation

4.9.1. Affected Environment

The City has approximately 656 acres of park and open space land within its corporate limits and UGA (Oneza & Associates 2020; Figure 4-4). The City's park land inventory includes neighborhood, community, large urban, regional, linear, and special use parks. In general, the City has excellent waterfront shoreline access along most portions of the Columbia River and part of the Snake River, with boating facilities, trails, and active and passive recreation opportunities. There is a land trail component and water trail component that make up a corridor of various habitats ranging from shrub-steppe to wetlands.

Sacagawea State Park is located at the confluence of the Columbia and Snake Rivers and includes a bike and pedestrian trail that connects to the Sacagawea Heritage Trail. The rivers provide recreational watersport and fishing opportunities on multiple shoreline locations. On the north side, Shoreline Road currently provides shoreline access to the Columbia River on the northern part of the City with some open space abutting the river.

The City of Pasco typically devotes 5% of the City's overall budget for parks and recreation. This funding supports the acquisition, development, and maintenance of facilities, and operation and management of recreational programs.

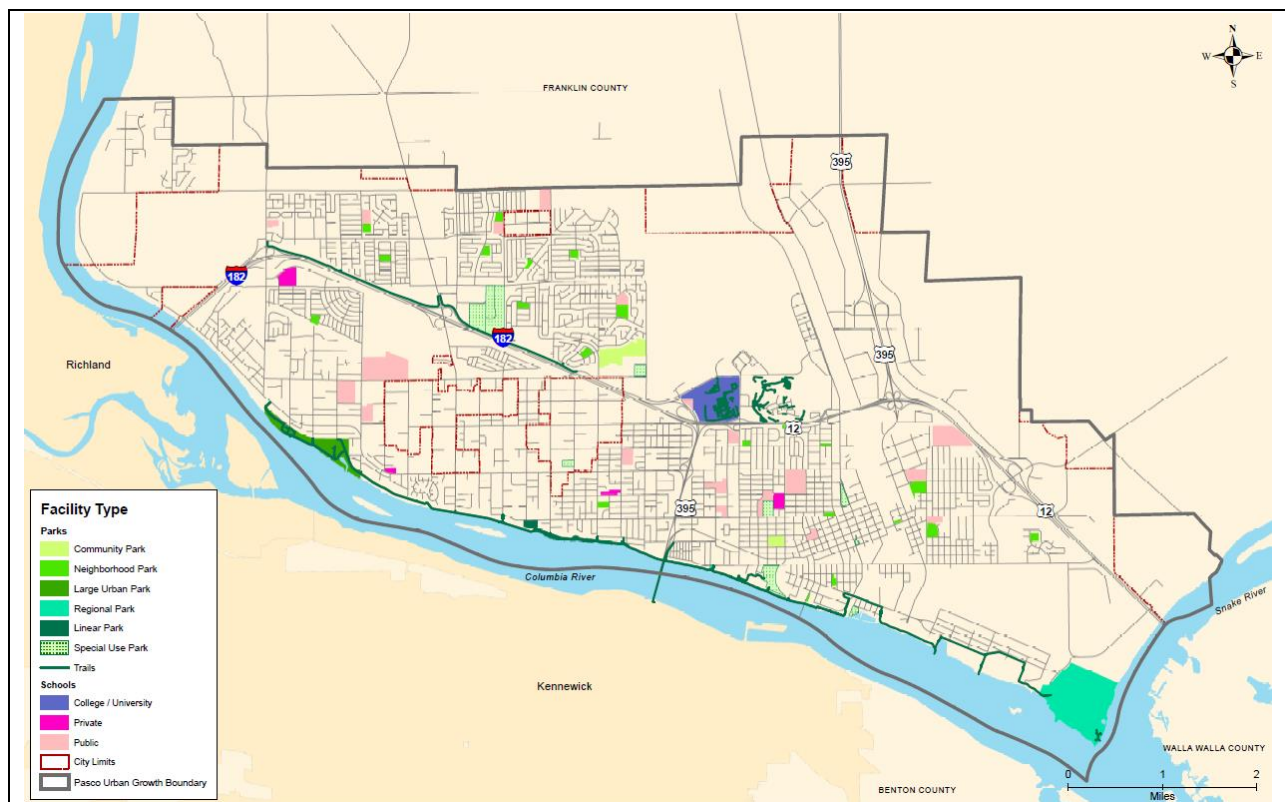


Figure 4-4 Existing Parks, Schools and Open Space

4.9.2. Impacts

Regional population growth will result in greater demand for parks and open space. Recreational opportunities will also be in higher demand, commensurate with population growth in the area.

Alternative 1: No Action Alternative

The No Action Alternative would provide additional parks and recreation within the City limits. Therefore, the parks and recreation opportunities would be insufficient to accommodate future population growth.

Alternative 2: Recommended Growth Target

Increased population growth and density projected for Alternatives 2 and 3 would place greater demand on parks and recreation facilities within and near the City. Alternatives 2 and 3 would preserve waterfront access to the Columbia River and trail along the river. Both alternatives would set aside lands to the north in the UGA to accommodate future parks demand.

Alternative 3: Recommended Growth Target High Density, Preferred Alternative

Alternative 3 includes the highest density residential land use allocation and would place a greater demand on parks and recreation facilities within the planning areas. Alternative 3 includes a more land for park and recreation than Alternative 2. Alternative 3 would provide natural open space and wildlife mitigation areas in the Broadmoor area. Additionally, the Broadmoor area will provide streetscape and design standards to offer additional urban recreational opportunities.

4.9.3. Mitigation Measures

For Alternatives 2 and 3, the following mitigation measures should be employed to reduce impacts to parks and recreation:

- Provide for park or recreation opportunities near urban centers through land use designations (Figure 4-5).
- As development occurs, incorporating shoreline access may be appropriate to meet future demand for access created by the development.
- Public access opportunities to the shoreline and other natural features should be considered through integration with the City's trail system to the extent practicable.
- Continue park and school impact fees for future developments

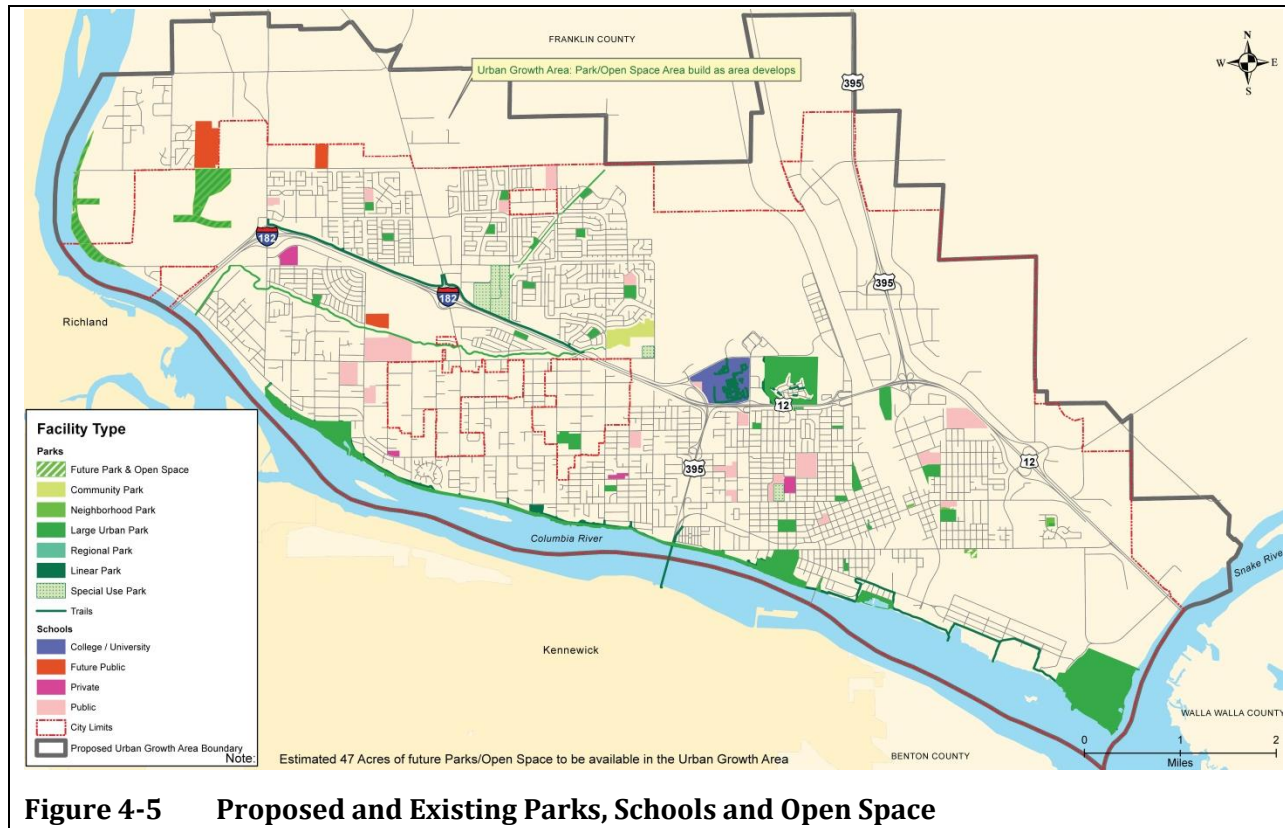


Figure 4-5 Proposed and Existing Parks, Schools and Open Space

Other Mitigation Measures

The current draft *City of Pasco Draft Comprehensive Plan (2020b)* Parks, Recreation, and Open Space goals encourage providing an integrated system of parks, recreation facilities, trails, and open spaces. Alternatives 2 and 3 should maintain consistency with the policies under this goal by:

- CF-5. GOAL: In conjunction with the County, provide parks, greenways, trails, and recreation facilities throughout the urban growth area.
- CF-5-B Policy: Encourage use of existing natural features, open spaces and appropriate excess right-of-way as an integral part of the community-wide park system.

CF-5-C Policy: Maintain a cooperative agreement with the Pasco school district regarding the development, use, and operation of neighborhood parks. Also consider Goals from the City of Pasco Parks, Recreation and Forestry Plan (2016) provides additional mitigation measures:

- Goal 1: Provide physical facilities that offer youth and adults a broad variety of passive, active and organized recreation opportunities
- Goal 2: Maintain and rehabilitate park and recreation facilities to provide the highest quality of service level to the community

The GMA provides 14 goals for comprehensive planning, including goals to encourage the retention of open space and development of recreation opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks. Development under Alternatives 2 and 3 should consider these goals to the extent practicable in providing parks and recreation opportunities.

The *City of Pasco Shoreline Master Program Update* includes policies to work with other jurisdictions, property owners, open space groups, and interested parties to develop and

implement regional and City parks, recreation, trails plans, and appropriate implementation strategies (Anchor QEA 2014).

4.10. Transportation

4.10.1. Affected Environment

The Tri-Cities area is the largest metropolitan area between Spokane to the northeast, Seattle to the northwest, Portland to the west, and Boise to the southeast. Because of its location, the Tri-Cities is a major transportation hub for travelers and commodities in the Pacific Northwest. As part of the Tri-Cities, Pasco has easy, direct access to all modes of commercial transportation services (Oneza & Associates 2020). Throughout the next 20 years, Pasco is projected to experience a 3 percent annual increase or a 66 percent of total increase in population. This growth will result in an increase in traffic volumes to, from, through, and within the City.

The Tri-Cities are connected to the interstate highway system. I-82 links the Tri-Cities metropolitan area to I-90 to the north and west, through Yakima, and to I-84 to the south, in northern Oregon. I-182, which passes through Pasco, links Pasco to these interstates and US 395. US 12 links the Tri-Cities to the interstates and to US 395 and provides access to Walla Walla and other southeastern Washington locales. The limited-access interstates serving the Tri-Cities carry between 40,000 and 60,000 vehicles per day. I-182 is a major 6-lane freeway that travels through the City of Pasco from the western edge at the Columbia River providing access to Richland and connects to US 395 which provides access to the City of Kennewick to the south. The only other access across the Columbia River is the Cable Bridge or SR 397 connecting to Kennewick from the downtown area of Pasco. The Washington State Department of Transportation is responsible for maintaining an adequate level of service on these highways. The City has developed future street classification system that re-emphasizes a grid network with arterial and collector roadways that serve the existing developed areas. Figure 4-6 shows the transportation network in the City.

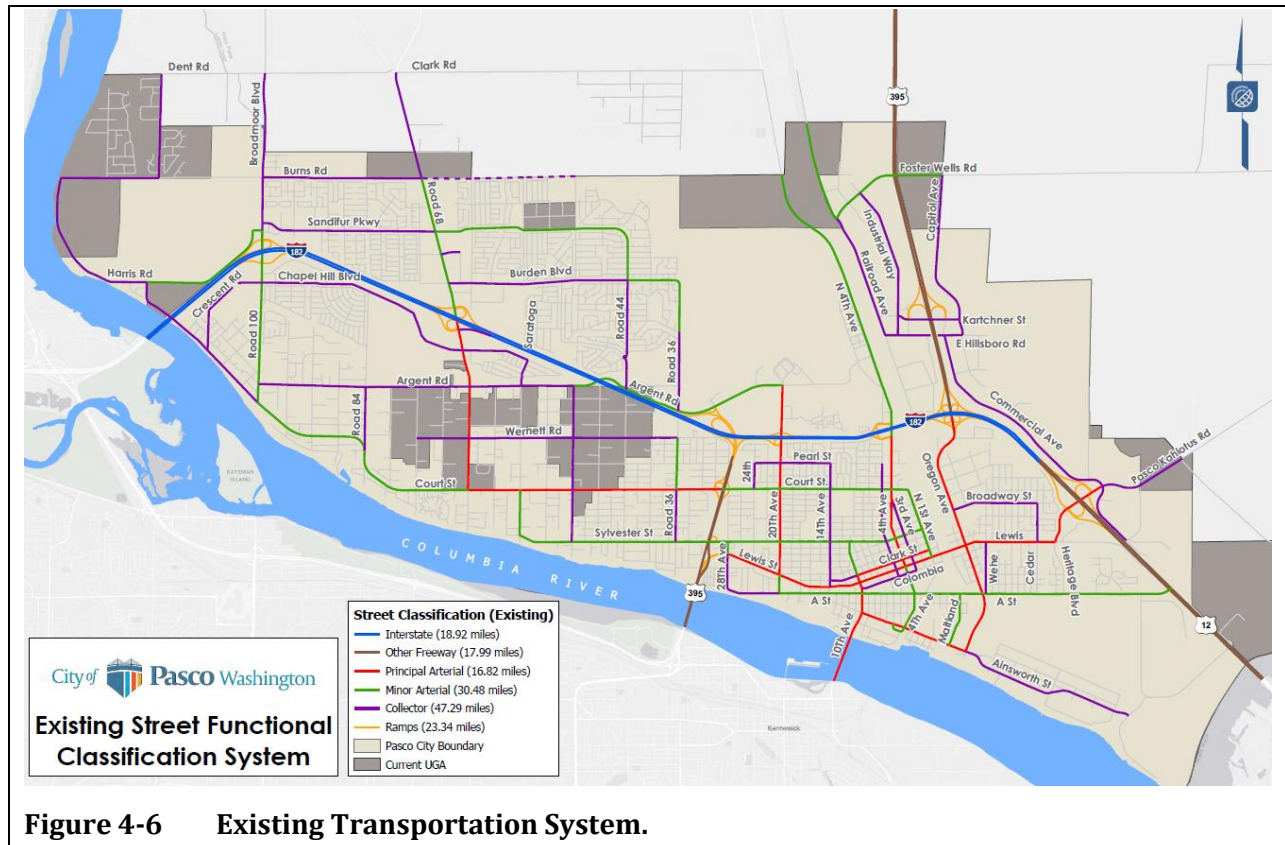


Figure 4-6 Existing Transportation System.

4.10.2. Impacts

Demands on transportation and transit facilities throughout the City would continue to increase due to future population and employment growth. Under all alternatives, continued maintenance of these facilities would occur on a regularly scheduled or as-needed basis. For transit operations, the increases could increase in hours of operations and some capital facilities such as park-and-ride lots. This includes projects under the regional *2020-2025 Transportation Improvement Program* developed by the Benton-Franklin Council of Governments for the Tri-Cities Metropolitan Planning Organization (MPO) and Benton-Franklin Regional Transportation Planning Organization (RTPO; 2019).

Increases in population and employment levels would also increase the demand for additional non-motorized facilities such as trails and bikeways. These bicycle and trail facilities may be located along roadways as bike lanes/sidewalks or as separated facilities and would provide opportunities for recreational and commuter users.

Under all alternatives, rail and airport use could also increase. In general, as employment and population increase, the use of these facilities also increases. Rail facilities would be affected by an increase in commerce associated with employment growth. Airport activity would also increase as recreational activities and employment increases.

The major facilities that will be affected by the forecasted growth in the City of Pasco under all alternatives are US 395, I-182 as well as Road 68 and Road 100/Broadmoor Blvd, both of which provide the only access at interchanges with I-182 in the western portion of the City where much of the growth is forecast to occur.

Alternative 1: No Action Alternative

The No Action Alternative would result in continued use of land under the existing Plan land use designations. Future population and employment growth would not be accommodated under the No Action Alternative and could potentially result in increased and more diffuse impacts to transportation facilities from future development in other parts of the City and nearby rural areas. In turn, maintenance of transportation facilities would also be greater and more widespread across the City rather than focused near infill and urban areas.

Alternative 2: Traditional Growth Target

Under Alternatives 2, the land use patterns would increase in intensity from the current agricultural land uses to low-density and predominantly residential uses. Increased population within the planning areas would in-turn increase demand on transportation facilities. Compared to Alternative 3, Alternative 2 would require additional roads to serve the larger area. Traffic analysis also indicates that Alternative 2 would likely need additional intersection improvements at several intersections due to longer trip lengths.

Development associated with Alternative 2 and Alternative 3 would result in potential impacts from construction activities, including increased traffic volumes, increased delays, detour routes, and road closures. During construction, vehicles would be necessary to bring equipment and materials to the planning areas. Large, oversized trucks could require pilot vehicles as they travel to and from the freeway with large loads. These trucks may also require flaggers to manually divert or control traffic as it enters or exits roadways (due to large turning radii). This traffic maintenance would cause delays for motorists.

Alternative 3: Compact Growth Target, Preferred Alternative

Alternative 3 also includes significant population growth, increasing in intensity from the current vacant, under-utilized and agricultural uses to a variety of low, medium and high density residential, commercial, and public uses. However the population will be accommodated within a smaller geographic area with higher residential densities. The additional commercial and employment included in the land use assumptions of Alternative 3 would potentially decrease the amount of trips and trip lengths resulting with less 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. This increased demand would be more localized than the diffuse impacts anticipated under the No Action Alternative.

4.10.3. Mitigation Measures

For Alternatives 2 and 3, the following mitigation measures should be employed to reduce impacts to the transportation network (Figure 4-7):

- The City will undertake joint efforts with the Washington State Department of Transportation to identify appropriate improvements at the I-182/Road 68 interchange as well as the I-182/Road 100/Broadmoor Blvd interchange along with appropriate local roadway improvements to protect and preserve those investments.
- The City will implement travel demand management methodologies identified in the City of Pasco Draft Comprehensive Plan (2020b) to limit and manage the demand on and access to the major facilities of I-182 and US 395.

- During construction, the City will work with its development applicants to oversee that appropriate coordination with affected agencies and property owners occurs upon future development. This includes providing appropriate public notification and detour routes upon development of its own projects.
- During construction, the City could require construction management plans at the time of development to reduce potential short-term impacts.
- To accommodate future population growth projections, the City has planned a roadway network to serve developing areas, and many of the improvements will be paid for by private development. Identified improvements to transportation networks are described further in the City of Pasco Draft Comprehensive Plan Volume 2 (Oneza & Associates 2020).
- The City will cooperate with the RTPO and Benton-Franklin Council of Governments for levels of service.
- The City should consider multi-modal needs in new corridors and in street standards for when new roadway facilities are constructed.
- Implement the City of Pasco adopted Ordinance No. 3821 establishing concurrency procedures for transportation facilities in conjunction with new development.
- Implement land use compatibility that generates traffic along roads with adequate capacity
- City's allocates \$249M budget for Capital improvements in 2020-2025. About \$48M of this would be spent on transportation improvements.
- Various long term and short term improvements are identified in Table T-10 and T-11 in the Comprehensive Plan Volume II.
- City will continue to require the traffic impact fees from future developments that will be used for future road and other improvements

4.11. Public Services and Utilities

4.11.1. Affected Environment

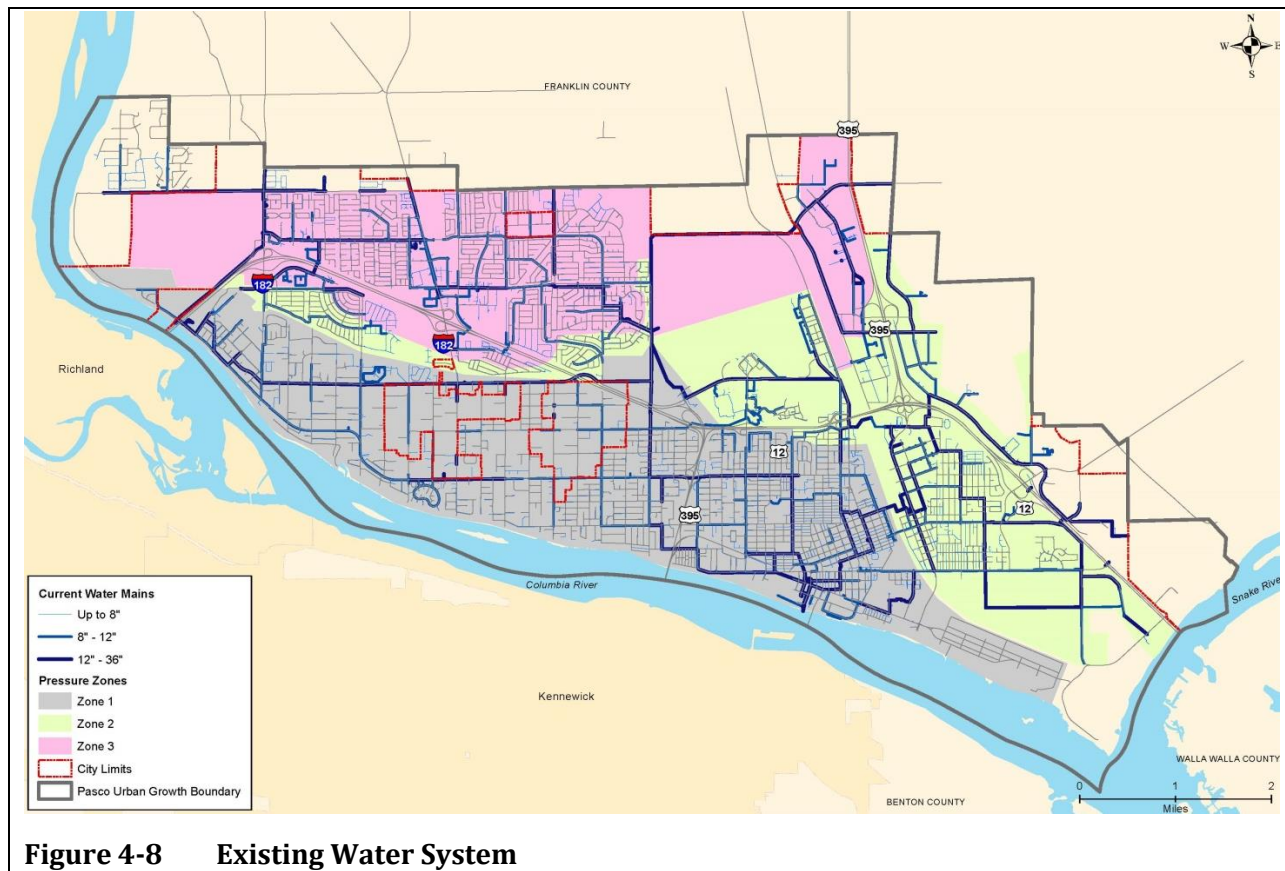
Water Supply System

The City's water system is supplied from surface water withdrawals from the McNary Pool of the Columbia River and includes two surface water treatment plants and three water reservoirs (Figure 4-8). The majority of the population within the incorporated limits of the City of Pasco is served by the City's Water Utility. The City has the following key water system facilities:

- Butterfield Water Treatment Plant: capacity of 26.8 million gallons per day
- West Pasco Water Treatment Plant: capacity of 6.0 million gallons per day
- Riverview Heights reservoir: 10 million gallons
- Rd 68 reservoir: 2.5 million gallons
- Broadmoor Boulevard reservoir: 1 million gallons

The City water distribution system has been arranged into three (3) service/pressure zones. Generally, these zones may be described as:

- Pressure Zone 1: South of I-182 and west of the railroad yard
- Pressure Zone 2: East of the railroad yard, the southern portion of the airport and a strip south of I-182 between Service Zone 1 and Service Zone 3
- Pressure Zone 3: Generally, north of I-182 and encompassing most of the northern part of the city



Sanitary Sewer and Wastewater Collection System

The City's collection system is a conventional collection system that mainly relies on gravity sewers to convey wastewater flow to two lift stations that discharge to the treatment facility (Figure 4-9). Additional pump stations and force mains are used to supplement the gravity system.

The City operates a wastewater collection and treatment system to manage the wastewater needs of the community. The City originally built a primary treatment facility in 1954 which has been upgraded over the years to increase design capacity and accommodate growth of the City's service area. This system operates under a National Pollutant Discharge Elimination System Waste Discharge Permit issued by Ecology. Currently, the system is served by one activated sludge wastewater treatment plant (WWTP) which oxidizes, nitrifies and disinfects wastewater flow prior to discharging to the Lake Wallula reach of the Columbia River.

The northern part of the City is currently not served by the system.

Industrial Wastewater Treatment Facilities

The City also owns, maintains and operates a separate industrial wastewater treatment plant (PWRP – Process Water Reuse Facility) that collects, stores and then applies food processor wastewater to farm circles north of the City as irrigation. The PWRP is an industrial facility that receives the discharge of process water from six food processors in the region. The PWRP is a public/private partnership. The PWRP and associated farm circle properties are located in an area of irrigated agriculture production fields on approximately 1,800 acres north of Pasco and east of Highway 395 in Franklin County. The City of Pasco has owned and operated the PWRP since 1995.

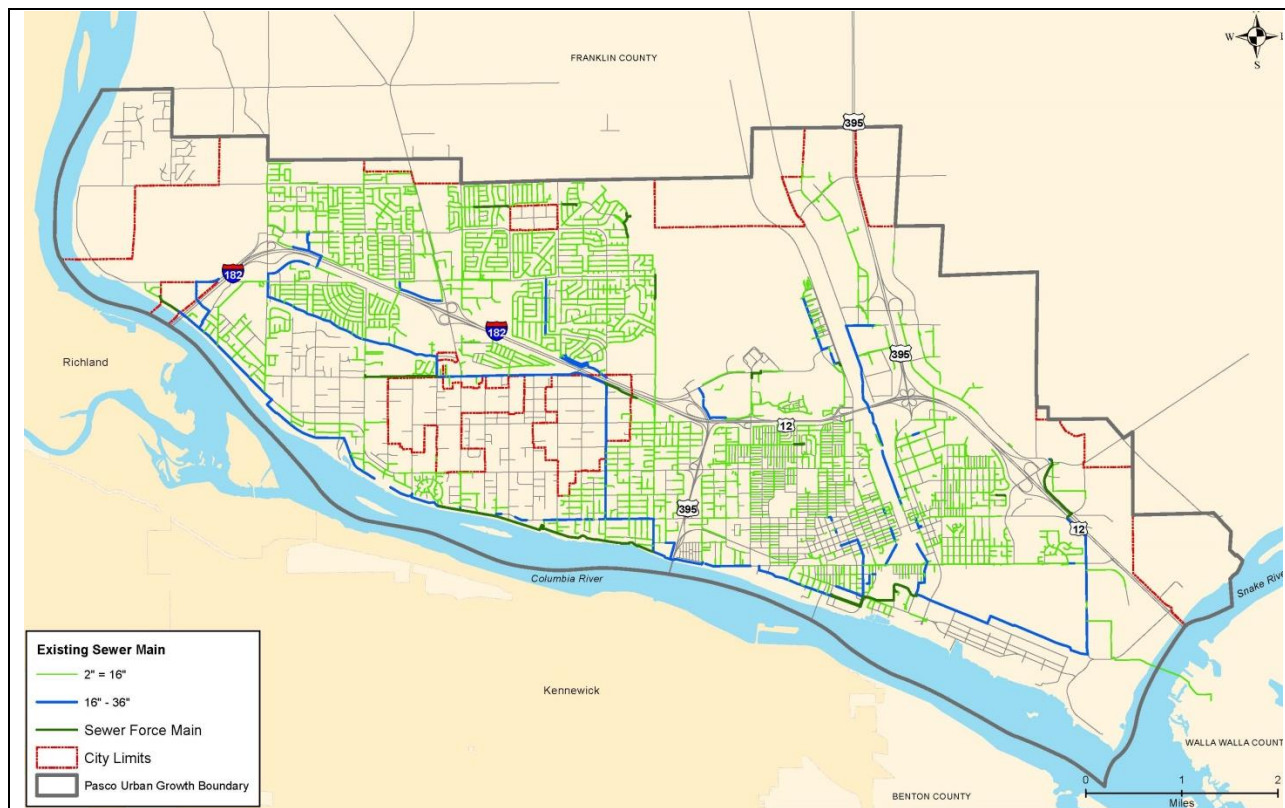


Figure 4-9 Existing Sanitary Sewer System

Stormwater System

Stormwater runoff is a major contributor of water quality pollution to waterways. Being located in a semi-arid climate, the streets in Pasco still collect sediments from construction sites, fertilizers and pesticides from yards, bacteria from animal waste, and gas, oil, and toxic metals from cars. Managing the stormwater system includes illicit discharge detection and elimination, runoff control, operation and maintenance, and monitoring of the system. The City continually updates its system through a combination of programs and facilities. Public involvement, education, and outreach are important components of the program.

Solid Waste Management

Solid waste collection services are provided in Pasco through a franchise agreement with Basin Disposal Inc. (BDI). BDI provides automated curbside services to all residential properties. Refuse is collected in the community and taken to the Transfer station on Dietrich Road. The transfer station tip-floor has a capacity of about 1,200 tons per day. BDI delivers approximately 646 tons per day of waste to transfer station each day. Any waste that is economically recyclable is diverted at this point and the remainder is placed in specially constructed trailers and transported to the regional landfill in Morrow County, Oregon.

Garbage service in the City is mandatory and is required for all businesses and residential structures. The residential service is often referred to as total service in that home owners may set additional bags, boxes or bundles beside their standard garbage can on collection day for pick-up at no additional charge. Garbage pick-up occurs weekly for all residential customers and may occur more than once a week for commercial customers. BDI also provides two coupons a year to residential customers that can be used for free dumping at the transfer station.

Public Safety

Pasco Fire Department (PFD) provides fire suppression, advanced life support, emergency medical services, ambulance transport services, technical rescue services, and hazardous materials services (through a regional partnership) to its service area community. The PFD, through a contract with the Port, also provides Aircraft Rescue and Firefighting services to the Pasco airport.

Law enforcement services for the City are provided by the City Police Department. Unincorporated areas of the UGA are served by the County Sheriff. The City and County law enforcement agencies cooperate readily when the need arises.

Energy

The primary supplier of electrical power to Pasco and the surrounding UGA is the Franklin County Public Utility District (Franklin PUD). The Franklin PUD purchases power from the regional power grid (Bonneville Power Administration) and then distributes through substations and distribution lines to the end users.

Utilities from Other Providers

Other utilities are provided by various service providers, including natural gas, telecommunications, and irrigation district facilities.

Additional details for all services described above are included in the *City of Pasco Draft Comprehensive Plan, Volume 2 - Supporting Analysis* (Oneza & Associates 2020).

4.11.2. Impacts

Under all alternatives, future population and employment growth will result in increased demand on public services and utilities. Increases in population density and employment under all alternatives could increase the number of calls for police and medical emergency services. Increases in traffic related to growth under both alternatives could affect the response time of emergency vehicles. Increases in vehicle and pedestrian traffic could result in the need for additional traffic enforcement. Increases in population and employment could occur and increase the use of existing schools and parks, as well as create a need for new educational and recreational facilities. The demand for other public services, including sanitary sewer, wastewater treatment, water, stormwater, solid waste management, energy, and other utilities, would also increase.

Construction impacts from population and employment growth would occur to accommodate the increased demand. Impacts include construction to expand capacity for water and sewer services; existing water and sanitary sewer lines would be abandoned in place or removed and replaced with new and larger lines. New and larger water and sewer mains would be installed in existing and/or future dedicated public rights-of-way or within dedicated utility easements to the City, and would connect with the existing distribution network. Existing utility lines would continue to service the area during construction, or temporary bypass service would be implemented until the distribution or collection system is complete and operational. Construction impacts on fire protection and emergency medical services could include increased calls for service related to inspection of construction sites and potential construction-related injuries.

Alternative 1: No Action Alternative

The No Action Alternative would result in continued growth under the existing Plan's land use designations. Future population growth would not be accommodated under the No Action Alternative. This could impact public services and utilities need for these facilities to areas surrounding the City and neighboring rural areas in the County. Additional growth would put pressure on the rural facilities providers.

Alternative 2: Recommended Growth Target

Under Alternatives 2 and 3, the land use patterns and the planning area would increase significantly in intensity from the current under-utilized land uses to mixed-use and predominantly residential uses. Increased residential density would increase demand on public services and utilities. Construction impacts in these areas would also increase to accommodate more intense land uses. These impacts would be more localized rather than the diffuse impacts in the nearby rural areas under the No Action Alternative. Public services and utilities in the north side are currently limited and will require transportation and other public services improvements and utility connections to occur under future use scenarios.

Alternative 3: Recommended Growth Target High Density, Preferred Alternative

Alternative 3 includes a similar level of development as Alternative 2, with increased residential density expected to the north, and in an area smaller than the area in Alternative 2. This alternative would place the greatest demand on public services and utilities. However, these demands would be more localized rather than the diffuse impacts anticipated under the No Action Alternative or spread out impacts anticipated in Alternative 2.

4.11.3. Mitigation Measures

For Alternatives 2 and 3, the following mitigation measures should be employed to reduce impacts to public services and utilities (Figures 4-10 and 4-11):

- The City should continue to implement the improvements described in the City of Pasco Comprehensive Water System Plan (CWSP), 2019 to address deficiencies resulting from growth for the planning period. Priority projects and financing are included in the 2019 Capital Improvement Program for water and stormwater systems (City of Pasco).
- The City should continue to implement the improvements described in the *City of Pasco Comprehensive Sewer Plan (CSP), 2019* to address deficiencies resulting from growth for the planning period.
- To accommodate future population growth, the City should maintain its services with Basin Disposal Inc.
- In 2019, the City conducted an Expanded UGA Infrastructure Evaluation, which evaluated the impact of the anticipated growth, UGA expansion, and land use changes. As a result, in order to accommodate future growth, the City will need to make additional improvements to the West Pasco WTP, Zone 3 Reservoir, and acquire additional water rights to meet the 2038 demands.
- In 2017 and 2019, the City re-evaluated the capacity and loading requirements of the Northwest Service Area as a result of potential development demands and growth projects changes as part of the 2019 Comprehensive Plan update and Urban Growth Area (UGA) expansion. A strategy to provide sewer service to the proposed UGA and other growth areas within the city (Broadmoor Area) was evaluated and alternatives were identified.
- The 2016 Pasco Emergency Services Master Plan proposes a reconfiguration of stations and an extension of services to the north.
- City allocates \$249M budget for Capital improvements in 2020-2025. About \$57M would be spent on Sewer System Improvements, \$40M on water, \$36M on process water resource facility, \$25M on Fire safety, \$2M on irrigation and \$1M of stormwater.

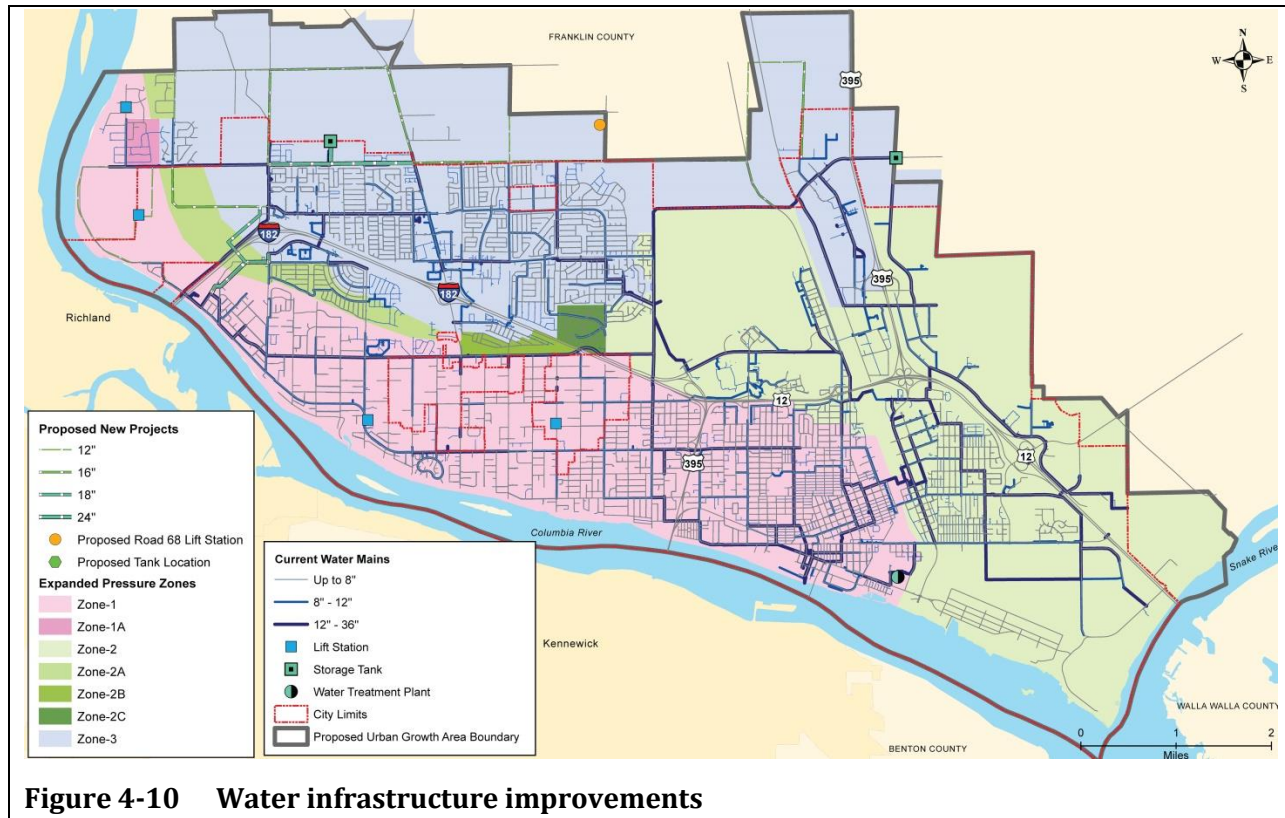


Figure 4-10 Water infrastructure improvements

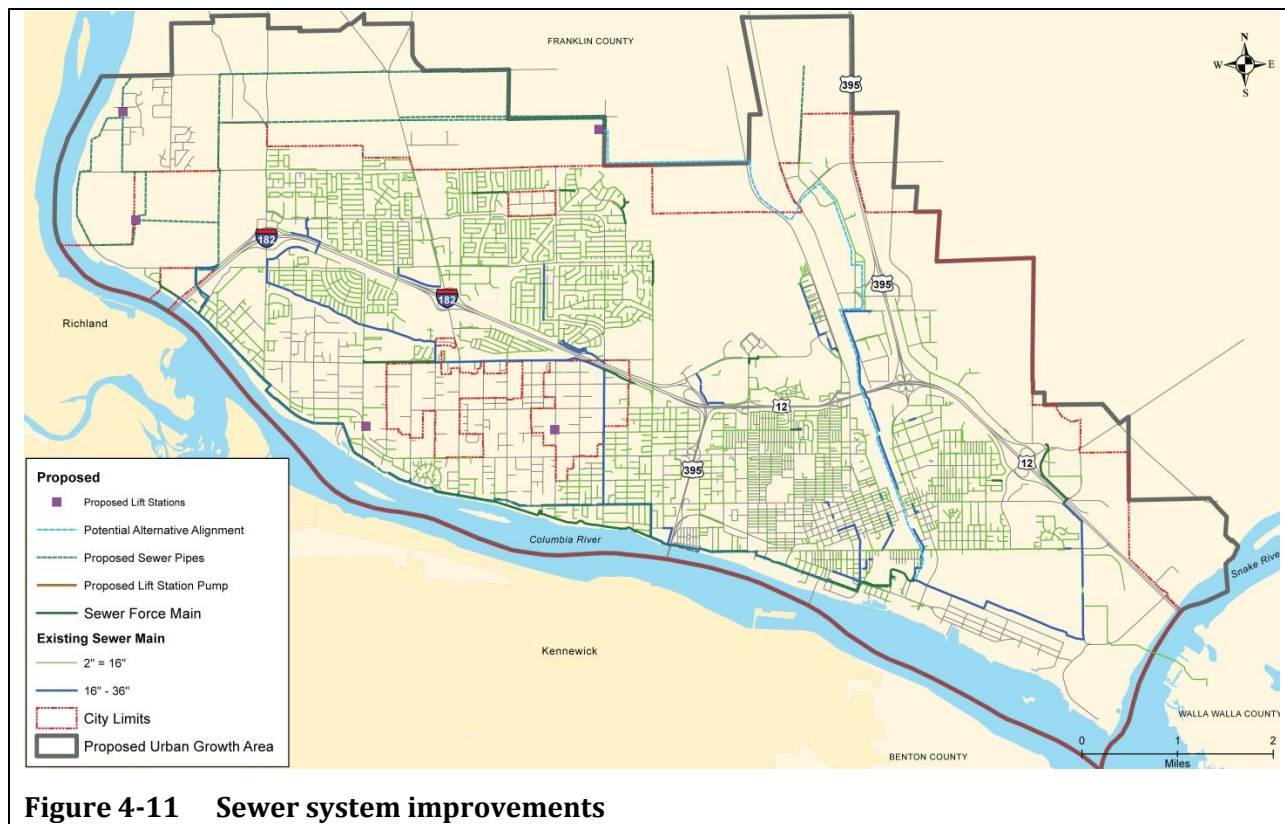


Figure 4-11 Sewer system improvements

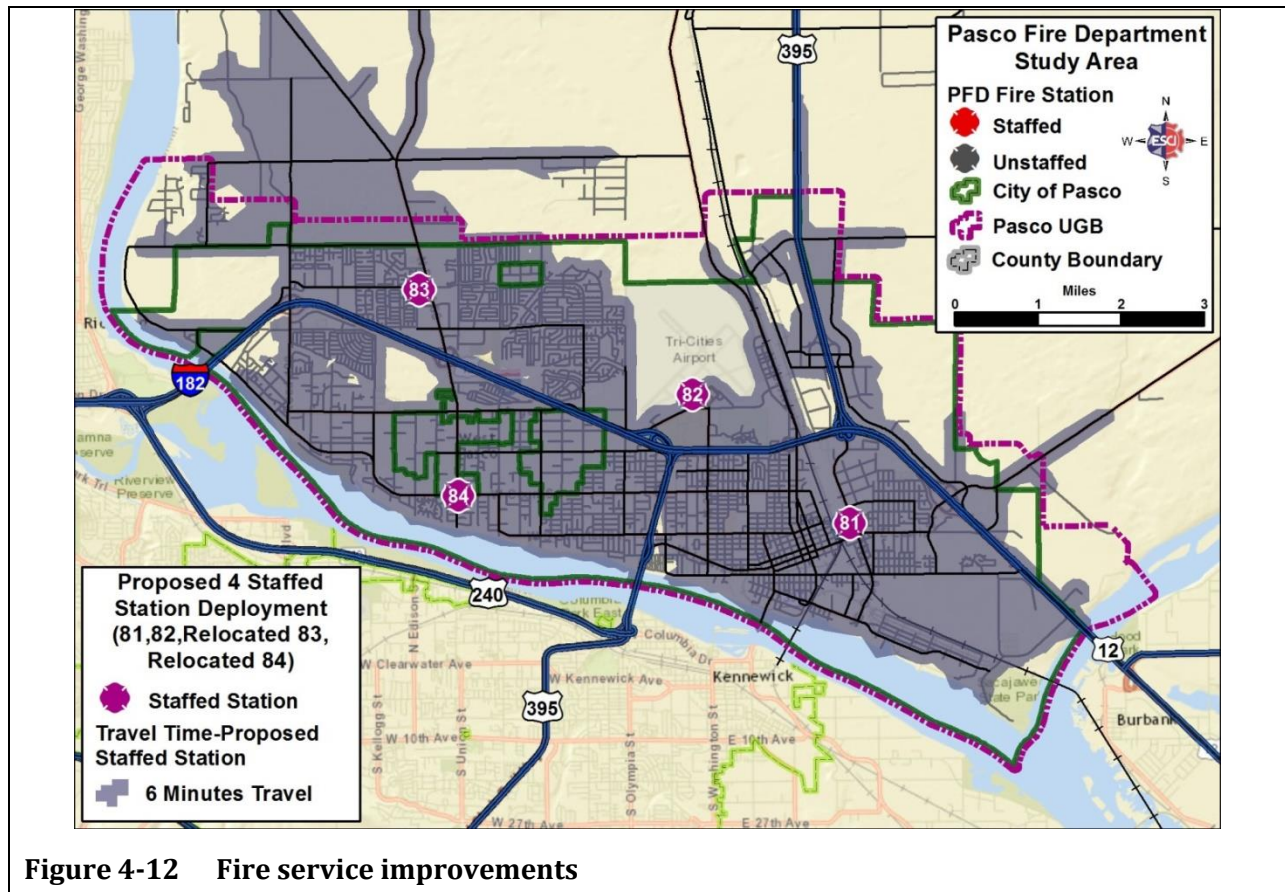


Figure 4-12 Fire service improvements

Other Mitigation Measures

The current draft *City of Pasco Draft Comprehensive Plan (2020b)* utilities element goals are intended to ensure public facilities and services necessary to support development are planned, sized, and constructed to serve new development. Alternatives 2 and 3 should be implemented consistent with the policies identified therein. This includes using a minimum 20-year planning horizon to plan for City-provided public utilities and identifying new facilities, expansions, and improvements that will be needed. The City will work with other purveyors of public services to provide facilities and services concurrent with development. The City will also minimize environmental impacts while providing safe and reliable services.

- CF-2. Goal: Ensure concurrency of utilities, services, and facilities consistent with land use designations and actions within realistic capital budget capabilities.
- CF-3. Goal: Maintain adequate lands for public facilities.
- CF-4. Goal: Acquire adequate water rights for future needs.
- CF-7. Goal: Maintain within the City a level of fire protection service that is efficient and cost effective. Encourage that same level of service in the unincorporated portion of the the Urban Growth Area.
- UT-I Goal: Provide adequate utility services to the Urban Growth Area to assure that the anticipated 20-year growth is accommodated.

- UT-3 Goal: Assure the provision of adequate and efficient storm water management.

4.12. Heritage Conservation

4.12.1. Affected Environment

Pasco Cultural History

Pasco is located at the confluence of the Columbia and Snake rivers. It is in the Southern Plateau, part of the larger Columbia Plateau culture area. The Southern Plateau stretches from southern Okanogan County in the north to the northern border of the Great Basin to the south. The prehistory and history of the Southern Plateau is briefly summarized here.

Beginning about 11,000 years ago, early mobile foragers were present in the Columbia Plateau. This was followed by a brief but widespread Clovis occupation, and a “broad-spectrum” hunter-gatherer culture developed in the Columbia Plateau region and persisted until the middle Holocene, around 5,300 years ago (Chatters and Pokotylo 1998).

A shift toward more permanent settlement began around 6,000 years ago, characterized by intensive salmon fishing and associated storage features, social inequality, large permanent winter villages, and diverse tool assemblages (Chatters and Pokotylo 1998; Ames et al. 1998).

Pasco is in the traditional territory of the Palus tribe, a constituent tribe of the Confederated Tribes of the Colville Reservation. It is also in the 1855 ceded lands of the Yakama Nation, additionally the Wanapum Band of Priest Rapids and the Walla Walla tribe also utilized the area extensively. All are Sahaptin-speaking Plateau people. Traditional Plateau cultures were based on a seasonal round that took advantage of fish runs, game, and root resources, as well as trade, kinship ties, and intermarriage among groups (Walker 1998). Prior to historic resettlement, permanent winter villages anchored the seasonal round (Boyd and Hajda 1987).

The spot where the Snake enters the Columbia had been a popular tribal rendezvous spot for centuries, sometimes called the Grand Rendezvous or the Great Forks. Tribes commonly camped, fished, and wintered from the Snake's mouth upstream on the Columbia for eight miles toward the spot where the Yakima River enters. The City of Pasco spreads out today over the eastern bank of this stretch of the Columbia (Brum & Associates, 2014).

Fishing activities revolved around an early salmon run in March, and a second, larger run in June (Schuster 1998). Gathering activities took place throughout the year. Although salmon were a key staple, plant foods also made up a significant portion of the diet (Hunn 1981).

By the time of the first sustained contact between the tribes of the Pasco area and Euro-American settlers in the mid-1800s, tribal life had already been significantly impacted. Introduced diseases decimated the population (Vibert 1997:50), and the introduction of the horse altered social and economic activities.

In 1853, Washington became a territory separate from Oregon and, by the next year, Governors of both the territories began pursuing treaties that relegated tribes to reservations (Wilma 2003).

The Lewis and Clark expedition recorded the first description of the confluence area in 1805, and David Thompson passed through in 1811 (Nisbet 2005). The area was rarely visited, and several early attempts at settlement (a mission, a group of cattle ranchers) failed (Kershner 2008). However, by the 1890s, settlers had established an agricultural economy and built irrigation systems (Kershner 2008).

The general Tri-Cities region as a whole is within territory inhabited traditionally by Native people represented today by the Confederated Tribes of the Colville Reservation, the Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Umatilla Indian Reservation, and the Wanapum Band of Priest Rapids. Large permanent villages were located in prominent locations, such as at the confluence of the Columbia River (Nch'i-Wana) and the Yakima River (Koots Koots A Min Ma). (Heather & Darby, 2018).

The original town site of Pasco was created in April of 1886 with the recording of the Pasco Town Plat. The original town site contained 8 blocks equally divided by the Pacific Northern Rail yards. From that modest beginning Pasco has grown to encompass more than 33 square miles of land. The original town site that was home to a handful of settlers. (Oneza & Associates, 2020)

The Yakima-Columbia confluence has a rich archaeological record, with sites in the area attributed to all of the Southern Plateau cultural phases. The area has been, “occupied more or less continuously for the last 10,000 years” (Western Heritage 1983). There are 32 recorded archaeological sites within 1 mile of the confluence.

The arrival of the Northern Pacific Railroad in 1884 established Pasco as a major junction between rail lines serving Seattle, Tacoma, Spokane, and Portland. The Columbia Basin Project reached Pasco in 1948. This project, in turn, spurred agricultural growth for the entire region thanks to the irrigation of nearby rivers. World War II had a significant impact that is still felt in the region because of the development of the Naval Air Station Pasco flight training facility (later the Tri-Cities Airport), the Hanford Nuclear Reservation, and the Manhattan Project. While primary operations and research are conducted nearby in Benton County, Pasco’s rail infrastructure provided much needed logistical help along with plentiful land to house some of Hanford’s earliest workers.

These events (rail, irrigation, air, and nuclear energy) have affected the cultural environment that Pasco, and the region enjoys today.

Recorded Cultural Resources

Many archaeological sites, Native American traditional places, and historical structures related to the area’s cultural history have been recorded in the City.

Previously conducted cultural resources review

This discussion includes two of many cultural resource reviews undertaken in Pasco and Tri-Cities area. A cultural resources survey for the Pasco Tri-Cities airport area indicates two National Register of Historic Properties (NRHP) in the city of Pasco south of the Tri-Cities Airport. The Franklin County Courthouse (Building #78002740, 1016 N. 4th St., Pasco) is approximately 1.4 miles south of the Tri-Cities Airport. The Pasco Carnegie Library (Building #82004212, 305 N. 4th St., Pasco) is located approximately 1.7 miles south of the Tri-Cities Airport. The James Moore House (Resource ID: 674795) is also on the NRHP. The pedestrian archaeological survey did not locate any prehistoric or historic sites. Pasco’s Historic Preservation Plan (Brum & Associates, 2013) includes an inventory of historic buildings and structures.

The Broadmoor area Cultural Literature Review, review of the WISAARD database shows 13 archaeological sites fall within a mile of the Broadmoor area. Some sites fall in Benton County, others fall in Franklin County. Eight of these sites fall within the National Register of Historic Places (NRHP)-eligible “Tri-Cities Archaeological District,” which runs along the Columbia River bank including adjoining uplands, starting at about Van Giesen Street on the Benton County side, and just slightly north of Burns Road in Franklin County in the north, all the way to the Pioneer Memorial Bridge (locally referred to as the Blue Bridge) to the south (Solimano 2012). Also present within the Broadmoor Area is the “Hanford South Archaeological District,” which covers about 19 miles on

both banks of the Columbia River, beginning at River Mile 350.5 (north of Wooded Island) and ending at River Mile 339 (near north Richland) (Hanford South Archeological District 45DT39A form 1983). One site within a mile of the Project Area falls within the Hanford South District. The Hanford South District has never been determined as eligible for the National Register and has not been recently updated in WISAARD, so its NRHP eligibility is unknown to NWA at this time.

All but one of the 13 sites within a mile of the Broadmoor Area are precontact (one is historic) — eight of the 13 are eligible to be listed on the National Register. There are no sites located directly within the Broadmoor Area. Native American burials are identified within this radius. There are also archaeological shell deposits, irrigation features and an archaeological camp. The singular historic site found within a mile of the Project Area indicates historic farming was also occurring nearby. The number of sites and their proximity to the river is unsurprising due to the nature of Native cultures in the Broadmoor Area subsisting largely on fish resources since time immemorial (Hansen and Darby, 2018).

Similarly, for the proposed Urban Growth areas identified in Alternatives 2 and 3, no recorded resources, including archaeological sites, historic structures or other resources are located directly within these boundaries. Some irrigation related structures are identified but have been determined not eligible to be counted as historic resources. It is important to note that there have been only limited surveys for these resources conducted in the proposed UGA areas. There are some resources just outside of the UGA areas, including facilities associated with the Esquatzel canal (Anchor QEA 2020).

Even with this information, the cultural sensitivity of the city and its Urban Growth Area (UGA). Washington State Department of Archaeology and Historic Preservation (DAHP's) Statewide Predictive Model categorizes the city and the UGA areas as "high to very high risk" for encountering cultural resources (DAHP 2020). This means there is high potential for the presence of archaeological resources in the region that could be disturbed or otherwise impacted by development.

4.12.2. Impacts

Generally, the potential for impacts to cultural resources is proportional to the intensity of development. The greater the horizontal and vertical extent of ground disturbance, the more likely that a development will impact archaeological materials, historic structures, or traditional cultural properties.

Several existing laws and regulations govern the identification and treatment cultural resources. These include:

- Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulations 800, which apply to projects that are federally funded or approved.
- Governor's Executive Order 05-05, which applies to projects that use State of Washington capital funds.
- RCW 27.53 (Archaeological Sites and Records), which prohibits the unpermitted removal of archaeological materials and establishes a permitting process.
- RCW 27.44 (Indian Graves and Records), which describes how human remains must be treated.

Also, PMC Historic Preservation Title 20 regulates historic sites for "identification, evaluation, designation, and protection of designated historic and prehistoric resources".

Given these laws and regulations, it is likely that any impacts to significant cultural resources would have to be mitigated, in consultation with Native American tribes and the Department of Archaeology and Historic Preservation.

Alternative 1: No Action Alternative

Under the No Action Alternative, areas of proposed change would maintain the current zoning. Under existing conditions, most of City would be developed to its maximum capacity. Construction citywide could potentially impact cultural resources, including recorded and unrecorded archaeological sites.

Alternative 2: Traditional Growth Target

Under the Traditional Growth Target Alternative, various new residential, public use, and commercial developments could occur in the north side of the UGA. These developments would likely include disturbance of previously undisturbed soils for building foundations, utilities, roadways, and other infrastructure. Unrecorded archaeological sites could be affected in these areas.

Alternative 3: Compact Growth Target, Preferred Alternative

Under the Compact Growth Target Alternative, developments would be similar to the Traditional Growth Target Alternative, though with greater intensity of development in some parts of the planning areas. The greater magnitude could lead to potentially greater disturbance of undocumented archaeological resources.

4.12.3. Mitigation Measures

The City should comply with applicable laws and regulations regarding impacts to cultural resources. Section 106, Executive Order 05-05, and RCW 27.53, among others, require impacts to cultural resources be mitigated. Mitigation is developed on a project-by-project basis, in consultation with Native American tribes, the Department of Archaeology and Historic Preservation, and other interested parties.

The draft *City of Pasco Draft Comprehensive Plan (2020b)* goals and policies encourage the preservation of structures, districts, and cultural resources unique to the City. The following goals and policies should be considered for future development:

- LU-8 Goal: Encourage the restoration and rehabilitation of historic buildings and sites.
- LU-8-A Policy: Allow adaptive re-uses in historic structures.
- Franklin County Countywide Planning Policies Historic Preservation: Identify and encourage the preservation of land sites and structures that have historical or archaeological significance.

4.13. Summary of Impacts by Alternative

Table 12

Summary of Impacts by Alternative

Topics/Impacts Common to All Alternatives	Alternative 1: No Action Alternative	Alternative 2: Traditional Growth Target	Alternative 3: Compact Growth Target, Preferred Alternative
4.13.1. Earth			
<ul style="list-style-type: none"> Earth-related impacts Disturbance mechanisms (e.g., clearing, grading, erosion, impervious area expansion, and contamination) related to construction and operation would be scaled with the intensity of future development and operation. 	<ul style="list-style-type: none"> Disturbance mechanisms to earth resources would be less intensive than with Alternatives 2 and 3. Population growth would not be fully accommodated and could result in increased and more diffuse impacts to earth resources from sprawl-type development in other parts of the County and nearby rural areas. 	<ul style="list-style-type: none"> Increased impacts to earth resources compared to No Action Alternative associated disturbance mechanisms from more intensive development within the planning areas. Increased erosion potential, compaction, or contamination of earth resources from development within the planning areas. Due to lower density development compared to Alternative 3, and maximum acreages occupied under this alternative, the extent of impacts to earth resources within the undeveloped or infill areas would be more in Alternative 2 than other two alternatives 	<ul style="list-style-type: none"> Similar impacts as Alternative 2, but denser residential development proposed. This would result in higher population density per acre and reduce sprawl-type development in the City and nearby rural areas to accommodate future population growth. Concentrated development and associated impacts within the planning areas would reduce earth-related impacts in other areas.

Topics/Impacts Common to All Alternatives	Alternative 1: No Action Alternative	Alternative 2: Traditional Growth Target	Alternative 3: Compact Growth Target, Preferred Alternative
4.13.2. Surface Water			
<ul style="list-style-type: none"> • Development activities may cause erosion or increase impervious surfaces that could discharge contaminated or sediment-laden water to nearby surface waters. • Point source and non-point source pollution can be exacerbated by development if not properly managed or mitigated. • Development of undeveloped areas could reduce groundwater recharge and potentially reduce baseflow to nearby surface waters. • Changes in population and increased development could limit the availability of water supplies. 	<ul style="list-style-type: none"> • Lower population growth and less intensive development within the planning areas would have less impact on surface waters compared to Alternatives 2 and 3. • Impacts to water supplies and water supply demand would also be less due to lower number of population accommodated compared to Alternatives 2 and 3. • Population growth would not be fully accommodated and could result in increased and more diffuse impacts to surface water from sprawl-type development in the nearby rural areas. 	<ul style="list-style-type: none"> • Changes in development patterns in the north UGA area from irrigated/ vacant to developed lands would change stormwater and groundwater recharge dynamics. • Without mitigation, higher intensity development within the planning areas could put surface waters at greater risk of degradation. • Water supply demand could be higher than the No Action Alternative due to higher population growth. 	<ul style="list-style-type: none"> • Similar impacts as Alternative 2, but denser residential development would increase impervious surfaces and other development-related impacts within the planning areas. • • Development within the City could potentially result in decreased and less diffuse impacts to surface water resources from future development in other parts of the City and nearby rural areas compared to Alternatives 1 and 2.

Topics/Impacts Common to All Alternatives	Alternative 1: No Action Alternative	Alternative 2: Traditional Growth Target	Alternative 3: Compact Growth Target, Preferred Alternative
4.13.3. Plants and Animals			
<ul style="list-style-type: none"> Impacts to plants and animals would generally be scaled with the level of development. Construction causes noise and other activities that are known to cause short-term behavioral disturbance to wildlife. Development activities can remove vegetation and result in fragmentation of wildlife habitat, reduce wildlife habitat quality and function, and result in long-term operational impacts. 	<ul style="list-style-type: none"> Lower population growth and less-intensive development within the planning areas would have less impact on plants and animals compared to Alternatives 2 and 3. Population growth would not be fully accommodated and could result in increased and more diffuse impacts to plants and animals from sprawl-type development in the nearby rural areas, potentially impacting shrub-steppe habitat, burrowing owl, and other wetlands or riparian vegetation designated in other communities. 	<ul style="list-style-type: none"> Due to lower density residential designations compared to Alternative 3, increased development in other parts of the City and nearby rural areas could have greater and more diffuse impacts to plants and animals. Changes in development patterns from irrigated/ vacant to developed lands would alter the landscape and potentially reduce habitat provided by the existing uses. 	<ul style="list-style-type: none"> Similar impacts as Alternative 2, but denser residential development in would potentially reduce habitat provided by existing uses. More area would be preserved in the Broadmoor area including the core PHS areas.

Topics/Impacts Common to All Alternatives	Alternative 1: No Action Alternative	Alternative 2: Traditional Growth Target	Alternative 3: Compact Growth Target, Preferred Alternative
4.13.4. Land Use			
<ul style="list-style-type: none"> • Future development could convert undeveloped and infill areas to more intensive uses. • Construction-related and operational impacts could affect immediate vicinity and nearby land uses from increased noise, light and glare, and traffic delays; changes in views or the aesthetic character of the area; and increased pressure to develop or redevelop adjacent vacant or underutilized areas. 	<ul style="list-style-type: none"> • The No Action Alternative would result in continued use of the properties as currently zoned by the City. • Population growth would not be fully accommodated and could result in increased and more diffuse impacts to land uses in the nearby rural areas. • in the long-term, when developments are permitted in the vacant and infill areas under the current land use and zoning, this will result in significant aesthetic and visual quality impacts. 	<ul style="list-style-type: none"> • Land use patterns would increase in intensity in the north UGA area as they change from irrigated/ agricultural / vacant to predominantly residential uses. • Vacant open land will also be transformed by future roadways, commercial development, and light industrial activities with some green spaces. • None of the area would include Franklin County designated agricultural lands of long-term commercial significance. 	<ul style="list-style-type: none"> • Similar impacts as Alternative 2, but denser residential development in the planning area and would better accommodate future population growth. • Higher density and more concentrated development. Land use to the north would transform from underutilized, low intensity current uses to a mix of Low, Medium, and High Density Residential, Commercial, Public Facility, and Open Space. • None of the area would include Franklin County designated agricultural lands of long-term commercial significance.

Topics/Impacts Common to All Alternatives	Alternative 1: No Action Alternative	Alternative 2: Traditional Growth Target	Alternative 3: Compact Growth Target, Preferred Alternative
4.13.5. Environmental Health			
<ul style="list-style-type: none"> • Future developments of infill and undeveloped commercial and industrial lands could impact environmental health. • During construction of some industrial developments, chemicals may be stored that could potentially create a risk of fire, explosion or spills. 	<ul style="list-style-type: none"> • The No Action Alternative would result in increased and intense use of industrial lands. • Developments in vacant and infill areas under the current land use and zoning will result in continued risks to environmental health as seen by current development patterns. 	<ul style="list-style-type: none"> • Under this alternatives, existing County under-utilized industrial lands will be added to the UGA and will be developed. • New industrial developments could increase the exposure to chemicals or risk of fire. Hazardous waste could occur depending on the types of uses. 	<ul style="list-style-type: none"> • Under this alternatives, existing County under-utilized industrial lands will be added to the UGA and will be developed. • New industrial developments could increase the exposure to chemicals or risk of fire. Hazardous waste could occur depending on the types of uses.

Topics/Impacts Common to All Alternatives	Alternative 1: No Action Alternative	Alternative 2: Traditional Growth Target	Alternative 3: Compact Growth Target, Preferred Alternative
4.13.6. Air Quality/Greenhouse Gas			
<ul style="list-style-type: none"> • Future development would include expansion of commercial and industrial space; therefore air pollutant emissions generated within the study area are expected to increase. • Vehicle miles traveled for those who work in the City and its UGA would also increase, along with the tailpipe emissions generated by those vehicles. • Temporary construction activities are common to all alternatives. • Increases in ozone are all expected for each alternative at varying degrees based on concentration of development. 	<ul style="list-style-type: none"> • Population is expected to increase but not at the same levels within the City limits and UGA areas as expected with Alternatives 2 and 3, so the localized air quality effects are expected to be lower. 	<ul style="list-style-type: none"> • Exposure to PM2.5 and ozone would initially be slightly lower than the No Action, as the UGA area for Alternative 2, but over time as development occurs and more population is located within the City and UGA area, then these values are expected to increase. • Expanding the UGA will limit the ability for existing and future residents in the subject area from being able to burn, which may lead to air quality enhancements. 	<ul style="list-style-type: none"> • Similar effects to Alternative 2 are expected, with potential higher localized concentrations due to expected higher densities.

Topics/Impacts Common to All Alternatives	Alternative 1: No Action Alternative	Alternative 2: Traditional Growth Target	Alternative 3: Compact Growth Target, Preferred Alternative
4.13.7. Shoreline Use			
<ul style="list-style-type: none"> Increased population growth has the potential to change shoreline uses and increase development in or adjacent to these areas. Changes in surrounding land use patterns could reduce the value of shoreline areas as recreational opportunities or wildlife habitat. 	<ul style="list-style-type: none"> Population growth would not be fully accommodated and could result in increased and more diffuse impacts to shoreline areas in the nearby rural areas. The current Public Facility and shoreline areas would allow for more intensive future development to occur adjacent to the shoreline compared to Alternatives 2 and 3. 	<ul style="list-style-type: none"> Directing development to within the planning areas would minimize potential impacts sensitive shoreline environments in other parts of the City or nearby rural areas. Future development would allow shoreline public access, recreational and water-oriented uses to occur. 	<ul style="list-style-type: none"> Similar impacts as Alternative 2, but denser residential development would better accommodate future population growth, reducing shoreline impacts in other parts of the City or nearby rural areas. Less shoreline area is involved in this alternative compared to Alternative 2.

Topics/Impacts Common to All Alternatives	Alternative 1: No Action Alternative	Alternative 2: Traditional Growth Target	Alternative 3: Compact Growth Target, Preferred Alternative
4.13.8. Population, Housing and Employment			
<ul style="list-style-type: none"> Population, housing, and employment growth are all expected, with more intensive growth occurring under Alternatives 2 and 3. Impacts to population, housing, and employment would occur from inadequate existing facilities or insufficient future development opportunities to accommodate growth. 	<ul style="list-style-type: none"> Population and employment growth would not be fully accommodated and would nominally increase housing or employment opportunities in the City. Housing demand would not be met based on future population growth trends. 	<ul style="list-style-type: none"> Land use would accommodate population growth and provide housing and employment opportunities. The industrial area to the north along US-395 would provide the City with additional capacity for industrial developments to add more jobs. 	<ul style="list-style-type: none"> Similar impacts as Alternative 2, but denser residential development would better accommodate future population growth and provide more opportunities for housing and employment. Higher intensity uses within the planning areas would increase issues related to increased development in urban environments such as traffic, noise, air pollution, public service demands, and other issues, but within a lesser geographic area compared to Alternative 2.
4.13.9. Parks and Recreation			
<ul style="list-style-type: none"> Regional population growth will result in greater demand for parks and open space. Recreational opportunities will be in higher demand, commensurate with population growth. 	<ul style="list-style-type: none"> No parks and recreation would be provided beyond the land already set aside for public purposes and would be insufficient to accommodate future population growth. 	<ul style="list-style-type: none"> Preserving Open Space land use in UGA area would meet the future demand for park land. 	<ul style="list-style-type: none"> More parks and open space area than Alternative 2. Denser residential development proposed would place greater demand on parks and recreation in these areas. In the Broadmoor area, streetscape and design standards to offer additional urban recreational opportunities.

Topics/Impacts Common to All Alternatives	Alternative 1: No Action Alternative	Alternative 2: Traditional Growth Target	Alternative 3: Compact Growth Target, Preferred Alternative
4.13.10. Transportation			
<ul style="list-style-type: none"> • Demand on transportation and transit facilities would increase commensurate with population and employment growth. • Demand for additional non-motorized facilities such as trails and bikeways would also increase with population growth. • Rail and airport use would increase with population and employment growth. 	<ul style="list-style-type: none"> • Population and employment growth would not be fully accommodated and would result in increased and more diffuse impacts to transportation facilities in other parts of the City and nearby rural areas. • Maintenance of transportation facilities would also be greater and more widespread to accommodate growth in other parts of the City and nearby rural areas. 	<ul style="list-style-type: none"> • Increased density would increase demand on transportation and transit facilities, as well as non-motorized transportation opportunities. • Compared to Alternative 3, Alternative 2 would require additional roads to serve the larger area. Alternative 2 would likely need additional intersection improvements at several intersections due to longer trip lengths. • Construction impacts on transportation facilities would be increased near the planning areas from development. 	<ul style="list-style-type: none"> • Similar impacts as Alternative 2, but with the population being accommodated within a smaller geographic area with higher residential densities, this would place greater but more localized demand in these areas. • The additional commercial and employment included in the land use assumptions of Alternative 3 however mean that shorter trip lengths would result, with less 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. This increased demand would be more localized than the diffuse impacts anticipated under the No Action Alternative.

Topics/Impacts Common to All Alternatives	Alternative 1: No Action Alternative	Alternative 2: Traditional Growth Target	Alternative 3: Compact Growth Target, Preferred Alternative
4.13.11. Public Services and Utilities			
<ul style="list-style-type: none"> • Demand on public services and utilities would increase with population and employment growth. • Increases in traffic could result in the need for additional traffic enforcement and affect the response time of emergency response vehicles. • Public facility usage would also increase with population and employment growth. 	<ul style="list-style-type: none"> • Population and employment growth would not be fully accommodated and could impact public services and utilities by increasing the service area to other parts of the City and neighboring rural areas. • Increased and more diffuse demand for public services and utilities could result in added costs to the City and utility providers and delay service response times. 	<ul style="list-style-type: none"> • Increased growth would increase demand on public services and utilities. However, this demand would be more localized to urban areas compared to the No Action Alternative. • Increased residential growth would increase demand and construction impacts related to public services and utilities. 	<ul style="list-style-type: none"> • Similar impacts as Alternative 2, but denser residential development would place the greatest demand on public services and utilities. The increased demand would be more localized to urban areas under this alternative. • Due to the limited area in the UGA compared to Alternative 2, cost associated with pipeline expansions, roads and utilities will be less.

Topics/Impacts Common to All Alternatives	Alternative 1: No Action Alternative	Alternative 2: Traditional Growth Target	Alternative 3: Compact Growth Target, Preferred Alternative
4.13.12. Heritage Conservation			
<ul style="list-style-type: none"> The potential for impacts to cultural resources is generally proportional to the intensity of development. Impacts to significant cultural resources would have to be mitigated, in consultation with Native American tribes and the Department of Archaeology and Historic Preservation. 	<ul style="list-style-type: none"> The vacant area to the north would likely remain vacant and maintain current uses with limited potential for impacts to archaeological resources. Under the existing land use designation, vacant lands within the City could be developed and potentially impact cultural resources, including recorded and unrecorded archaeological sites. 	<ul style="list-style-type: none"> New development would likely disturb soils and have the potential to impact unrecorded archaeological sites in these areas. The area re-designated as Commercial, Residential etc. could potentially impact cultural resources, including recorded and unrecorded archaeological sites and the Columbia Point South Cultural Landscape. 	<ul style="list-style-type: none"> Similar impacts as Alternative 2, but with greater intensity of development in some parts of the planning areas. At Broadmoor area, more cultural resources land will be preserved.

4.14. Summary of Mitigation Measures by Topic

Table 13

Summary of Mitigation Measures by Topic

Topics
4.13.1. Earth
<p>For Action Alternatives 2 and 3:</p> <ul style="list-style-type: none"> Maintain compliance with local air-quality agency requirements by watering exposed areas during construction. Avoid disturbing the steep areas. Compact soils at densities appropriate for planned land uses.

Topics
<ul style="list-style-type: none"> • Provide vegetative cover or soil cement on exposed surfaces. • Maintain Open Space land use and environment designations along the shoreline to protect shoreline functions. • Construction should be staged so that the maximum amount of existing vegetation is left in place. • Catch basins should be installed near storm drains <p>Other mitigation measures include:</p> <ul style="list-style-type: none"> • Maintain compliance with the CAO. • Development should be consistent with the goals and policies of the Comprehensive Plan.
4.13.2 Surface Water
<p>For Action Alternatives 2 and 3:</p> <ul style="list-style-type: none"> • Implement mitigation measures described for reducing impacts to earth resources described in Section 4.1.3. • Under both development alternatives, detention ponds will reduce peak runoff flows to natural state conditions. Detention ponds will also provide settlement for silt. Oil/water separators can reduce impacts from automobiles. • Additional mitigation measures include bio-filtration, either before or after entry into the various detention ponds, and buffers around wetlands in accordance with the CAO. • Stormwater improvements are planned to manage stormwater and protect water quality • Evaluate and apply Low Impact Development (LID) stormwater techniques, where appropriate, to maintain dispersed groundwater infiltration. <p>Other mitigation measures include:</p> <ul style="list-style-type: none"> • Development should be consistent with the goals and policies of the Comprehensive Plan. • Maintain compliance with existing federal, state, and local policies that regulate land use activities near, and within, surface waters such as the Yakima and Columbia rivers and wetlands, including: <ul style="list-style-type: none"> – NPDES regulations and City stormwater regulations – USACE wetland avoidance and mitigation requirements – The City SEPA and CAO requirements
4.13.3 Plants and Animals
<p>For Action Alternatives 2 and 3:</p> <ul style="list-style-type: none"> • Provide erosion and stormwater control measures during construction, particularly in areas adjacent to surface waters that provide fish and wildlife habitat such as Columbia Point South. • Consider landscaping with native plants to provide vegetation of habitat significance in streetscapes, buffers for stormwater swales,

Topics
<p>rain gardens, and other habitat features.</p> <ul style="list-style-type: none"> • Avoided, minimize, or mitigate impacts to shrub steppes, priority habitats, wetlands or wetland buffers, in accordance with the CAO and SMP. <p>Other mitigation measures include:</p> <ul style="list-style-type: none"> • Development should be consistent with the goals and policies of the Comprehensive Plan. • Maintain compliance with the CAO.
4. 13.4. Land Use
<p>For Action Alternatives 2 and 3:</p> <ul style="list-style-type: none"> • Meet population growth targets and housing demand through developing planned areas, and infill developments,. • Improve the built environment through designing new structures and development per City code. • Reduce local traffic volumes by creating a live-work environment in Alternative 3. • Protect shoreline areas according to the City's shoreline regulations under Title 29 • Allow adequate parks, open space and public facilities • Implement design standards for Broadmoor area developments under the Broadmoor area master plan and design standards. • Implement City's land use and zoning regulations to maintain the physical and aesthetic qualities of future developments. • Maintain low density residential in the airport's fly zones. New aviation easement(s) will be in place near the airport with height restrictions per PMC 25.190 Airport Overlay District. • Airport Overlay District (PMC 25.190) in the City and Franklin County (Chapter 17.76, Airport Zoning) codes - provide for safety, compatibility zones, use restrictions, and height limitations. • Maintain land use compatibility to mitigate adverse impacts between different land uses (see Comprehensive Plan Volume II) • Revised Alternative 3 further reduces the UGA area by 100 acres of agricultural land. <p>Other mitigation measures include:</p> <ul style="list-style-type: none"> • Development should be consistent with the goals and policies of the Comprehensive Plan. • Maintain compliance with City Zoning Regulations and CAO requirements. • Implement rural land protection measures and incentives to make UGAs and planning areas more attractive (e.g., density incentives and infrastructure investment).

Topics
4. 13.5. Environmental Health For Action Alternatives 2 and 3: <ul style="list-style-type: none"> • Improve the built environment through designing new structures with safety and hazard maintenance per PMC. • Maintain and employ emergency management plans for all industrial developments • Support the preparation of Spill Prevention, Control, and Countermeasures Plans (SPCC) required for existing facilities and construction projects, along with timely spill or contamination emergency response measures. • Support appropriate hazardous waste management through reuse, recycling, and disposal. • Listed hazardous sites should be subject to ongoing monitoring by Ecology's Hazardous Waste and Toxic Reduction Program. Other mitigation measures include: <ul style="list-style-type: none"> • Development should be consistent with the goals and policies of the Comprehensive Plan.
4. 13.6. Air Quality/Greenhouse Gas For Action Alternatives 2 and 3: <ul style="list-style-type: none"> • Reductions in traffic congestion through encouraging alternative modes of transportation such as transit and bicycles or walking may help offset any potential localized increase in emissions. Furthermore, on a regional basis, the EPA's vehicle and fuel regulations (coupled with ongoing future fleet turnover) should, over time, cause significant reductions in region-wide air quality levels. Ongoing EPA motor vehicle regulations have caused steady decreases in tailpipe emissions from individual vehicles, and it is possible that those continuing decreases from individual vehicles could offset the increase in vehicle traffic. • Air quality regulations require construction contractors to take all reasonable steps to minimize fugitive dust emissions during construction. These required mitigation measures are designed to reduce localized impacts affecting homes and businesses adjacent to construction sites. • Promote transit and other types of transportation that do not contribute to additional air emissions and reduce vehicle traffic. • Support State and EPA efforts to reduce ozone levels during hot summer days where levels might increase due to limited wind. • Continue to support hydropower electrical general facilities in the region that do not contribute to greenhouse gas emissions.
4. 13.7. Shoreline Use For Action Alternatives 2 and 3: <ul style="list-style-type: none"> • Provide a development buffer at along the Columbia and Snake rivers shoreline using Open Space land use designation • All shoreline goals and policies, and regulations should be applied for future developments • No net loss of shoreline ecological functions as a result of new development shall be allowed, consistent with the provisions of the SMP. Other mitigation measures include:

Topics
<ul style="list-style-type: none"> • Development should be consistent with the goals and policies of the Comprehensive Plan. • Maintain compliance with the City SMP and CAO.
4. 13.8. Population, Housing and Employment
<p>For Action Alternatives 2 and 3:</p> <ul style="list-style-type: none"> • Implement SOMOS Pasco economic development strategies. • Development of agricultural industrial businesses • Infrastructure development • Train labor force • Promote tourism • Meet housing demand through developing existing planned areas, infill developments, and Development of the UGA <p>Other mitigation measures include:</p> <ul style="list-style-type: none"> • Development should be consistent with the goals and policies of the Comprehensive Plan. • Maintain compliance with the Washington State GMA requirements. • The City should consider infill incentives and upzones.
4. 13.8. Parks and Recreation
<p>For Action Alternatives 2 and 3:</p> <ul style="list-style-type: none"> • Consider ways to provide park or recreation opportunities near urban centers through land use designations. • As development occurs, incorporating shoreline access may be appropriate to meet future demand for access created by the development. • Public access opportunities to the shoreline and other natural features should be considered through integration with the City's trail system to the extent practicable. • Continue park and school impact fees for future developments <p>Other mitigation measures include:</p> <ul style="list-style-type: none"> • Development should be consistent with the goals and policies of the Comprehensive Plan. • Maintain compliance with the Washington State GMA requirements. • Maintain compliance with the City SMP policies to work with other jurisdictions, property owners, open space groups and interested parties to develop and implement regional and City parks, recreation, and trails plans and appropriate implementation strategies.

Topics
4. 13..9. Transportation
<p>For Action Alternatives 2 and 3:</p> <ul style="list-style-type: none"> • The City will undertake joint efforts with the Washington State Department of Transportation to identify appropriate improvements at the I-182/Road 68 interchange as well as the I-182/Road 100/Broadmoor Blvd interchange along with appropriate local roadway improvements to protect and preserve those investments. • The City will implement travel demand management methodologies identified in the City of Pasco Draft Comprehensive Plan (2020b) to limit and manage the demand on and access to the major facilities of I-182 and US 395, • During construction, the City will work with its development applicants to oversee that appropriate coordination with affected agencies and property owners occurs upon future development. This includes providing appropriate public notification and detour routes upon development of its own projects. • During construction, the City could require construction management plans at the time of development to reduce potential short-term impacts. • To accommodate future population growth projections, the City has planned a roadway network to serve developing areas, and many of the improvements will be paid for by private development. Identified improvements to transportation networks are described further in the City of Pasco Draft Comprehensive Plan, Volume 2 - Supporting Analysis (Oneza & Associates, 2020). • Cooperate with the Benton-Franklin Council of Governments for levels of service, • The City should consider multi-modal needs in new corridors and in street standards for when new roadway facilities are constructed. • Implement the City of Pasco adopted Ordinance No. 3821 establishing concurrency procedures for transportation facilities in conjunction with new development. • Implement land use compatibility that generates traffic along roads with adequate capacity • City's allocates \$249M budget for Capital improvements in 2020-2025. About \$48M of this would be spent on transportation improvements. • Various long term and short term improvements are identified in Table T-10 and T-11 in the Comprehensive Plan Volume II. • City will continue to require the traffic impact fees from future developments that will be used for future road and other improvements <p>Other mitigation measures include:</p> <ul style="list-style-type: none"> • Development should be consistent with the goals and policies of the Comprehensive Plan.

Topics
4. 13.10. Public Services and Utilities
<p>For Action Alternatives 2 and 3:</p> <ul style="list-style-type: none"> • The City should continue to implement the improvements described in the Comprehensive Water System Plan (CWSP), 2019 to address deficiencies resulting from growth for the planning period. • The City should continue to implement the improvements described in the <i>City's Comprehensive Sewer Plan (CSP), 2014</i> Plan to address deficiencies resulting from growth for the planning period. • To accommodate future population growth, the City should, maintains its services with Basin Disposal Inc.. • In 2019, the City conducted an Expanded UGA Infrastructure Evaluation, which evaluated the impact of the anticipated growth, UGA expansion, and land use changes. As a result, in order to accommodate future growth the City will need to make additional improvements to the West Pasco WTP, Zone 3 Reservoir, and acquire additional water rights to meet the 2038 demands. • In 2017 and 2019, the City re-evaluated the capacity and loading requirements of the Northwest Service Area as a result of potential development demands and growth projects changes as part of the 2019 Comprehensive Plan update and Urban Growth Area (UGA) expansion. A strategy to provide sewer service to the proposed UGA and other growth areas within the city (Broadmoor Area) was evaluated and alternatives were identified. • The 2016 Pasco Emergency Services Master Plan proposes a reconfiguration of stations and an extension of services to the north. • City allocates \$249M budget for Capital improvements in 2020-2025. About \$57M would be spent on Sewer System Improvements, \$40M on water, \$36M on process water resource facility, \$25M on Fire safety, \$2M on irrigation and \$1M of stormwater. <p>Other mitigation measures include:</p> <ul style="list-style-type: none"> • Development should be consistent with the goals and policies of the Comprehensive Plan. • The City should continue to provide and maintain collection services to all City residents consistent with adopted service levels and the <i>City's various public services and utilities plans</i>.
4. 13.11. Heritage Conservation
<p>Mitigation measures include:</p> <ul style="list-style-type: none"> • Comply with applicable laws and regulations regarding impacts to cultural resources. Section 106, Executive Order 05-05, and RCW 27.53, among others, require that impacts to cultural resources be mitigated. • Development should be consistent with the goals and policies of the Comprehensive Plan.

Chapter 5. Comments and Responses

5.1. Comments and Responses for Final EIS

Table 14

Comments and Responses for Final EIS

#	Commenter	Date Received	Item	Source	Comment (Rephrased, if necessary)	Response
1	Port of Pasco	2/18/2020	UGA	Exhibit #A – CPA2020-001 - UGA	<p>Port of Pasco is primary economic development organization within Franklin County. Strong support for adding industrial land to the Urban Growth Area to promote economic development and meet GMA goals.</p> <ul style="list-style-type: none"> • Much of the industrial property available in Pasco/Greater Tri-Cities does not meet development requirements (20 acres or greater), nearby utilities, access to transportation (highway and rail) and for heavy industry, a buffer from residential property. • Certain large industrial tracts are unavailable or very limited in their development. 220 acres of industrial land at Tri-Cities Airport is in the runway protection area. 640 acre tract of industrial land east of the new AutoZone is owned by the State Dept. of Natural Resources • Confederated Tribes of the Colville Reservation recently purchased 165 acres of industrial land located in the Commercial Avenue area. In 2016, Dept. of Natural Resources acquired 450 acres of industrial property within the UGA near the Snake River, with no plans to pursue industrial development. • Additional industrial land proposed to the UGA is north of existing industrial development. Land is already in industrial land use designation 	Noted

#	Commenter	Date Received	Item	Source	Comment (Rephrased, if necessary)	Response
					<p>within Franklin County.</p> <ul style="list-style-type: none"> Franklin County is net-exporter of talent, exporting 6% of its workforce each day to neighboring counties. Further reliance on industrial development distant from workforce housing in Pasco will further congest roadways. Companies will locate closer to their workforce if the right land is available. 	
2	Withers, Niel	4/3/2020	UGA	Exhibit #B – CPA2020-001 UGA	<p>Opposed to the proposed urban growth area boundary, specifically the area of 2,810 acres north of Burns Road</p> <p>The expansion further North will increase the congestion on RD 68 and its arterial roads of Burden RD, Sandifur Parkway, RD's 44 and 36, and the corresponding interchanges of Rd 68 and 100 and hwy182. The interchange already gets backed up onto hwy 182 from exit 7 and 9 during evening commute hours. The already planned expansion west of RD 100 will further congest that traffic as well.</p> <p>Expansion north will also put a strain on city services, police and fire and rescue. That can be remediated by hiring, buying and building more of necessary components of personnel Equipment and trucks. Additional Schools and teachers will be needed as well. Again more Spending. More bonds, more taxes to approve, more funding to secure. Expansions that have already taken place have brought in increasing number of real estate Speculators that are building and buying homes to rent, rather than being affordable for families to purchase. The number of quick build storage units</p>	<p>The Washington State Office of Financial Management has indicated that the City of Pasco will add approximately 48,000 residents between 2018 and 2038. An expansion is necessary to accommodate the necessary housing and employment needs of the community. Without an expansion, existing services, facilities and neighborhoods would be diluted and/or be over capacity risking Level of Service requirements.</p> <p>As the city expands, facilities and utilities (streets, sewer, water, Stormwater, etc) will be required as development occurs. The City collects impact fees for Parks, Schools and Transportation to assist with the construction of necessary infrastructure.</p> <p>The City is currently updating various elements of the Land Use and Zoning/Development Standards to increase housing density and options to accommodate a wide-range of community housing needs. The City was awarded funds for affordable housing through House Bill 1923 and pursuing a sales/tax credit through House Bill 1406.</p>

#	Commenter	Date Received	Item	Source	Comment (Rephrased, if necessary)	Response
					can confirm that.	
3	TLP (Bob Tippet)_1	4/9/2020	UGA	Exhibit #C – CPA2020-001 - UGA	<ul style="list-style-type: none"> This letter is on behalf of the Thanksgiving Limited Partnership (TLP). As Managing Partner, I ask that staff and the planning commission, reconsider the current Urban Growth Boundary to include all of the TLP property, as previously approved in Resolution 3845 dated June 18, 2018. TLP owns +/-140 acres of land immediately adjacent to City limits, and immediately north of 160 acres recently purchased by the Confederate Tribes of the Colville Reservation. The westerly property boundary (approximately 2,000 lineal feet) fronts Capital Avenue. The land is currently zoned AP-20 and Rural Residential 5 Acre Tracts. Per RCW 36.70A.110, the TLP property is postured to utilize existing sewer and water infrastructure available in Capital Avenue. To include the sewer lift station installed for the AutoZone project, which we understand, was adequately sized to accommodate the TLP property. Satisfies a City planning goal as defined in Appendix III of the City's Comprehensive Plan, under the heading Growth Management Mandate, which states "Encourage development of urban areas where adequate public facilities and services exist or can be 	<ul style="list-style-type: none"> 2016 Industrial Zoned Land Assessment indicated that the Tri-Cities region was well served by existing industrial land supply, although large parcels are limited. The TLP property is currently zoned AP-20 by Franklin County, and is adjacent to existing rural/residential development RCW 36.70A.110(2) requires the Urban Growth Area to be based on reasonable assumptions to accommodate twenty-years of growth Coordination with Franklin County necessary to confirm proposed conversion of land use and zoning for industrial or commercial use

#	Commenter	Date Received	Item	Source	Comment (Rephrased, if necessary)	Response
					provided in an efficient manner".	
4	Halvorson Northwest Law Group (Fickes)_1	5/14/2020	UGA	Exhibit #D – CPA2020-001 - UGA	<ul style="list-style-type: none"> The Property currently is under contract to be sold to Big Sky Developers, LLC for future residential development contingent upon the property being included in Pasco's UGA and zoned for residential development. CPA 2018-03, a proposal to expand the City's urban growth area, was originally submitted in June of 2018. The City's original Future Land Use Map included the Property within the City's expanded UGA with a land use designation of Low Density Residential consistent with all the surrounding property in the area. The Olberding Property Should Remain Designated Low Density Residential and The City's Proposed Commercial Designation Cannot be supported. Notice of the proposed map change has not been properly given; The proposed draft, October 2019 Future Land Use Map proposed by the City was not properly published and circulated to affected property owners as required by applicable law; RCW 36.70A.035; Our clients' position is that the March 19 Planning Commission meeting did not meet the public participation requirements of the Growth Management Act and SEPA as applied to any material modifications to the Future Land Use Map. The City's proposed Commercial designation cannot be supported; Our clients simply believe that based on GMA goals, the as-built 	<ul style="list-style-type: none"> The City issued a Scoped EIS during the Fall of 2018 indicating an additional scenario for evaluation (Compact Growth Target), now known as Alternative #3; the Scoped EIS followed SEPA regulations for public comment Public review of the Future Land Use (and Comprehensive Plan) officially began at the March 19th, 2020 Planning Commission Public Hearing RCW 36.70A.020(2) Reduce Sprawl, the inappropriate conversion of undeveloped land into sprawling low-density development shall be avoided and RCW 36.70A.020(3) encourages multi-modal and efficient transportation systems Providing lands for job growth, neighborhood commercial services (retail, business, etc.) provide existing residential communities alternative opportunities for commerce without overloading existing congested corridors Creating neighborhood commercial areas to accommodate new jobs was identified in the SOMOS Pasco ((Economic Strategic Vision) based on stakeholders including representatives from the Port of Pasco, City of Pasco, Franklin County, Columbia Basin College, Tri-Cities Hispanic Chamber of Commerce and Pasco Chamber of Commerce Per established Comprehensive Plan Goals, Policies, Growth Management Act

#	Commenter	Date Received	Item	Source	Comment (Rephrased, if necessary)	Response
					<p>environment and practical considerations, that an island of commercially-designated property is not needed and cannot be supported along Burns Road in the southwest portion of the Property.</p> <ul style="list-style-type: none"> First, there is absolutely no evidence in the record that the City of Pasco's inventory of commercially-designated and zoned property is inadequate. As a practical and legal matter, commercially-designated and zoned property should be located in and along established commercial corridors where commercial property and development already exists, such as along Road 68 or Broadmoor Boulevard. Our clients believe that the commercial designation proposed without notice to the owners or without any support on the record, violates one or more of the State's GMA planning goals including but not limited to the following: It fails to encourage development in urban areas where adequate public; facilities and services exist or can be provided in an efficient manner. RCW 36.70A.020(1) It fails to encourage efficient transportation systems coordinated with County and City Comprehensive Plans. RCW 36.70A.020(3) It fails to promote the retention or expansion of existing businesses and recruitment of new businesses, and fails to encourage such growth where public services and facilities are available. RCW 36.70A.020 (5) It fails to protect the property rights of landowners from arbitrary and discriminatory actions. RCW 36.70A.020 (6). It fails to ensure that public facilities and 	<p>requirements, staff is not in violation of RCW 36.70A.020(6); providing commercial areas for residential communities to access is appropriate and responsible planning</p> <ul style="list-style-type: none"> Public facilities, services, utilities and levels of service have been identified within the Comprehensive Plan and the Capital Facilities Analysis for the Expansion of the Urban Growth Area Specific zoning designations will not be applied until a formal annexation process begins; The City will not approve heavy/intensive commercial zoning adjacent to residential and public (school) sites Burns Road would require necessary improvements to be completed as development occurs, including capacity and safety upgrades and right-of-way dedications when properties are developed meeting requirements of RCW 36.70A.110(13) Current commercial land allocations have limited the city's ability to provide commercial jobs, services and related activities. Added commercial designations were recommended by the SOMOS Pasco effort identified by the Port of Pasco, City and Franklin County. The commercial designation at this specific property will provide nearby residential housing with opportunities without forcing additional and longer travel to existing shopping areas adding additional congestion onto Road 68, Sandifur and Burden Blvd.

#	Commenter	Date Received	Item	Source	Comment (Rephrased, if necessary)	Response
					<p>services necessary to support the commercial development will be adequate. RCW 36.70A.020 (12).</p> <ul style="list-style-type: none"> • The 80-acres immediately east of the Property recently has been sold to the Pasco School District for a future high school site, which use would be inconsistent with any type of more intensive commercial use. Last and most importantly, the entire area (north, south, east and west) is designated Low Density Residential and already supports significant low-density residential development. • Burns Road is not a commercial collector arterial and is inadequate to handle any type of commercial traffic. Burns Road does not even have the needed right-of-way and is not connected west, to Road 68. GMA mandates recognize that urban growth should first occur in areas already characterized by urban growth that have adequate existing public facilities and capacities to serve the development. RCW 36.70A.110(3). • A simple review of the proposed Future Land Use Map shows this small 30-acre Commercial designation to be in effect an illegal spot zone inconsistent with the surrounding community. In north Pasco, commercially designated properties should remain around established commercial collector arterials such as Broadmoor Boulevard and Road 68 and should not be located in isolated residential communities. 	

#	Commenter	Date Received	Item	Source	Comment (Rephrased, if necessary)	Response
5	Futurewise (Alison Cable)	5/19/2020	UGA	Exhibit #E – CPA2020- 001 - UGA	<ul style="list-style-type: none"> Urban growth areas help keep our existing cities and towns vibrant and economically desirable; This reduces the tendency to move out of existing center cities such as the City of Pasco In our August 2018 letter, we concurred with Franklin County and the Department of Commerce, that the expansion was oversized. Our recommendations were that the gross acreage reflect a reasonable market supply factor, incorporate an estimate of the redevelopable land in the existing UGA, and include the full capacity of the West Pasco/Broadmoor Development Master Plan of over 8,000 housing units in the capacity calculations. 	<ul style="list-style-type: none"> Noted The proposed Alternative 3 reflects a revised and reduced boundary based on 2018 comments from multiple agencies and a detailed analysis by the City.
6	Futurewise (Alison Cable)	5/19/2020	UGA	Exhibit #E – CPA2020- 001 - UGA	<p>Support Pasco's work to explore opportunities to expand development within the existing UGA, including but not limited to, actions eligible for support under HB 1923</p> <ul style="list-style-type: none"> Allowing more homes in existing neighborhoods through backyard cottages, duplexes, triplexes, and courtyard apartments. Retrofitting existing neighborhoods to be more walkable and have the densities and mix of zoning to support local businesses and more frequent transit in order to promote environmental and community health benefits and reduces traffic congestion. Making zoning changes, paired with proper infrastructure like sidewalks, that facilitate opportunities for restaurant and retail uses that are comfortably and safely accessible by walking and biking from nearby homes. Creating opportunities for townhouse and apartment zoning integrated throughout the 	<ul style="list-style-type: none"> Noted House Bill 1923 efforts underway through the Pasco Planning Commission Local Road Safety Plan conducted in 2020 evaluated transportation safety projects including Complete Street opportunities Ongoing Transportation System Master Plan will have emphasis on street connectivity, standards and opportunities to increase mobility opportunities

#	Commenter	Date Received	Item	Source	Comment (Rephrased, if necessary)	Response
					<p>city on quiet, slow moving residential streets that are safer for children rather than limiting these uses to the edges of major arterials and the area adjacent to the airport flight path.</p> <ul style="list-style-type: none"> Identifying a path to annexation of the existing 'donut hole' of unincorporated areas inside the city boundaries. We would like to offer our support in advocacy with the state to address barriers and costs related to annexing the 'donut hole' communities. These challenges are similar to those faced by unincorporated urban areas across the state. Reinvesting in historic downtown Pasco. 	
7	Futurewise (Alison Cable)	5/19/2020	UGA	Exhibit #E – CPA2020-001 - UGA	<ul style="list-style-type: none"> We are concerned about the loss of agricultural land of long-term commercial significance and if an expansion is needed, the city should consider alternatives expanding onto rural, non-agricultural land. We are concerned about the UGA expansion at the end of in the airport and under the flight path both because of its impact on airport operations and future expansion capacity and because of the impact on future residents living below the flight path. If an urban growth expansion is needed, determine how public facilities and services will be provided and funded. Will they be addressed in the updated transportation, capital facility, and utility elements? Will taxpayers in existing Pasco neighborhoods end up subsidizing the public facilities and services in these new neighborhoods? 	<p>Response to agricultural land of long-term commercial significance is addressed in comment response #68.</p> <p>See response to comment # 63 for airport area land use.</p> <p>Refer to the Capital Facilities Plan for the UGA. Financing of capital facilities includes various street funds, utility fees, grants and LIDs - mostly to be paid by the development.</p>
8	Halvorson Northwest Law Group	5/20/2020	UGA	Exhibit #F – CPA2020-001 - UGA	Our office represents Big Sky Developers, LLC that currently has under contract for purchase and residential development approximately 100	<ul style="list-style-type: none"> Resolution 3845 (approved June 2018) was not formally submitted to Franklin County; the Urban Growth Area Application was

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	(Fickes)_2				<p>acres of prime residential development property owned by Ms. Debra Kohler overlooking the Columbia River. The Property originally was slated for inclusion in Pasco's proposed UGA expansion currently being considered by the City of Pasco ("City" or Pasco") and its Planning Commission as part of its required periodic review of its Comprehensive Plan. The City's original application that included the Kohler Property within its UGA was submitted to Franklin County and its Planning Commission under CPA 2018-03.</p> <ul style="list-style-type: none"> Following limited public comment, the City apparently withdrew or modified its original UGA expansion application and has scoped three alternative proposals in a draft Environment Impact Statement (EIS) recently issued for its proposed UGA expansion; Alternative #3 was developed without specific notice to our client and without the input of affected property owners, and without substantial input from the Pasco development community. The Property owner Debra Kohler and the developer, Big Sky both strongly support the inclusion of the Property within the City's new UGA. The Property is located immediately adjacent to the City's existing UGA overlooking the Columbia River, is designated primarily Rural Shoreline Development under the County's Comprehensive Plan and is zoned RC-1 and AP-20. Urban level residential development already exists north and south of the proposed Property. 	<p>withdrawn so that the City could conduct additional analyses and evaluations, and prepare an Environmental Impact Statement on the Comprehensive Plan and Urban Growth Area impact</p> <ul style="list-style-type: none"> Scoped EIS issued in the Fall of 2018 indicated a third Alternative (#3) be created and evaluated, focused on compact urban growth Public review of the Urban Growth Area began at the March 19th, 2020 Planning Commission Public Hearing, Revisions of the Urban Growth Area through the Scoped EIS started in Fall 2019. The Urban Growth Area has been a workshop item for the Pasco Planning Commission and City Council nine separate occasions referencing a reduced UGA was likely Property is located one mile north of existing Urban Growth Area Boundary, residential to the north is rural development at less than 2 du/acre while residential development to the south is higher at 2.7 du/acre
9	Halvorson Northwest Law	5/20/2020	UGA	Exhibit #F – CPA2020-	The Kohler Property Should be Included in Pasco's UGA and Should be Designated Low Density	Per RCW 36.70A.020(2) Reduce the inappropriate conversion of undeveloped land into sprawling,

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	Group (Fickes)_2			001 - UGA	Residential Under its Comprehensive Plan.	<p>low-density development, the proposed expansion of the Urban Growth Area to include the site would be in violation. Expected population as determined in the Land Capacity Analysis can be accommodated within a reduced boundary as shown in Alternative 3.</p> <p>The Site is not within the study area for City of Pasco Comprehensive Sewer Plan Addendum (2020)</p> <p>The Scoping notice of EIS, issued in Fall 2018 indicted a revised and reduced alternative (#3) would be added to the boundaries considered.</p>
10	Halvorson Northwest Law Group (Fickes)_2	5/20/2020	UGA	Exhibit #F – CPA2020-001 - UGA	<ul style="list-style-type: none"> Notice of the new proposed map change and draft EIS has not been properly given. The proposed draft, October 2019 Future Land Use Map proposed by the City (which provided the basis for "Alternative #3" in the draft EIS) was not properly published and circulated to affected property owners as required by applicable law. Washington law is clear that county or city actions to change an amendment to a comprehensive plan triggers a statutory mandate for SEPA compliance, for public review and comment and robust public participation. RCW 36.70A.035. Our client's position is that prior Planning Commission meetings, including the one that occurred on March 19, did not meet the public participation requirements of the Growth Management Act and SEPA 	<ul style="list-style-type: none"> All maps have been identified as "Draft" as a final map will not be available until formal adoption of the Comprehensive Plan and Urban Growth Area Expansion Notices of the Draft Future Land Use Map and Urban Growth Area were sent to property owners in February, April and May 2020 and published on the Public Notice of the City Website meeting requirements of RCW 36.70A.035
11	Halvorson Northwest Law Group	5/20/2020	UGA	Exhibit #F – CPA2020-001 - UGA	<ul style="list-style-type: none"> As the City recognized when originally submitting its UGA expansion application (now Alternative #2), an expanded UGA of up to 	<ul style="list-style-type: none"> Alternative #2 did not include a Land Capacity Analysis and did not incorporate redevelopment, infill and updated zoning

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	(Fickes)_2				<p>4,700 acres was warranted by OFM population growth projections.</p> <ul style="list-style-type: none"> Washington's GMA generally recognizes that urban growth areas and urban growth should encompass areas first already characterized by urban growth that have adequate existing public facilities and service capacities, and second in areas already characterized by urban growth that will be served by existing and additional public facilities and services. RCW 36.70A.110(3) Most of the Property is not designated or suitable as agricultural lands of long-term commercial significance, and the Property owner is in the process of terminating all agricultural operations due to economic conditions. 	<p>regulations</p> <ul style="list-style-type: none"> Urban Growth Area shall only include areas and densities necessary to permit urban growth for a twenty-year period (RCW36.70A.110(2))
12	Halvorson Northwest Law Group (Fickes)_2	5/20/2020	UGA	Exhibit #F – CPA2020-001 - UGA	<p>Inclusion of the Kohler Property into the City's UGA also is consistent with multiple state GMA planning goals including but not limited to the following:</p> <ul style="list-style-type: none"> It encourages development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner. RCW 36.70A.020(1) It encourages efficient transportation systems coordinated with County and City Comprehensive Plans. RCW 36.70A.020(3). It encourages economic developments consistent with adopted Comprehensive Plans and encourages growth in areas already experiencing economic growth where public services and facilities can be provided. RCW 36.70A.020(5). It protects the property rights of landowners from arbitrary and discriminatory actions. RCW 	<ul style="list-style-type: none"> Public facilities are not identified in the Draft Comprehensive Plan, or ongoing Amendment of the Comprehensive Sewer Plan Low-density residential development prohibits the use of public transportation and does not support multi-modal transportation or efficient systems per RCW 36.70A.020(3) Inclusion is not consistent with the draft Comprehensive Plan or ongoing studies/planning efforts The City is not in violation of RCW36.70A.020(6) and is not proposing any use of the property, the site would be under the provisions of Franklin County RCW 36.70A.020(9)(10)(12) are not supported or met with inclusion of the property within the Urban Growth Area

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					<p>36.70A.020(6).</p> <ul style="list-style-type: none"> It would help protect and preserve open space and the environment by limiting groundwater use in hydraulic continuity with the Columbia River and limiting onsite sewage disposal systems. RCW 36.70A.020(9) and (10). It ensures public facilities and services necessary to support development will be adequate. RCW 36.70A.020(12). 	
13	Halvorson Northwest Law Group (Fickes)_2	5/20/2020	UGA	Exhibit #F – CPA2020-001 - UGA	<ul style="list-style-type: none"> UGA inclusion increases the likelihood that it will be done with City water and sewer which is more protective of the environment and which would allow infill development to occur. 	The site is currently located one mile north of the existing Urban Growth Area the Growth Management Act
14	Halvorson Northwest Law Group (Fickes)_2	5/20/2020	UGA	Exhibit #F – CPA2020-001 - UGA	<ul style="list-style-type: none"> Inclusion of the Kohler Property also is entirely consistent with many specific goals and policies of the Land Use elements of the City's draft Comprehensive Plan (02-24-2020), especially those in its housing element. Meets the proposed land use goal to plan for a variety of compatible land uses within the City's urban growth area which includes a specific policy to ensure that adequate public services are provided within a reasonable time frame. LU-2-C Proposed policy LU-2-F discourages developments dependent on septic systems and at densities below minimums to sustain urban level services. 	Prior to meeting established goals and policies of the Comprehensive Plan, the city must meet the requirements of delineating an appropriate Urban Growth Area per RCW 36.70A.110. Expected population growth can be accommodated within a reduced boundary as shown in Alternative 3.
15	Halvorson Northwest Law Group (Fickes)_2	5/20/2020	UGA	Exhibit #F – CPA2020-001 - UGA	<ul style="list-style-type: none"> The inclusion of the Kohler Property also is consistent with the City's draft proposed Capital Facilities and Water Comprehensive Plans. Extending City water one-half mile north along Dent Road would provide access to City water mains for perhaps as much as 420 acres of adjacent undeveloped land 	<ul style="list-style-type: none"> The Capital Facilities Analysis for the Urban Growth Area does not include this property RCW36.70A.020(9) and (10) both encourage the preservation and conservation of the natural environment including shorelines and natural habitat areas

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					<ul style="list-style-type: none"> Even if the City elects to reduce its proposed UGA size, the Kohler Property because of its location along the river and the availability of public infrastructure should be included as a unique 100- acre Property clearly slated for urban level growth within the next 20 years. 	
16	TLP (Bob Tippet)_2	5/21/2020	UGA	Exhibit #G – CPA2020-001 - UGA	<ul style="list-style-type: none"> In June 2018, inclusion of the 120 TLP acres was approved by resolution. In March TLP was notified with no prior discussion that the UGB had been revised to include only 40 acres of the 120 acres originally approved in Resolution 3845. 	<ul style="list-style-type: none"> Noted; Resolution 3845 (June 2018) was approved but a formal application to Franklin County was withdrawn/postponed Scoping notice of EIS (Fall 2018) indicated an additional UGA Alternative (#3) focused on a Compact Growth Target in compliance with the Growth Management Act and in response to public comments received
17	TLP (Bob Tippet)_2	5/21/2020	UGA	Exhibit #G – CPA2020-001 - UGA	TLP requests that the City re-consider including the entire 80 acre tax parcel in the UGA for this reason.	<ul style="list-style-type: none"> Noted Evaluation underway for potential impacts associated with including additional AP-20 from the County into the Urban Growth Area Consideration of existing and planned development of adjacent properties is underway
19	Stromstad, Caleb	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Public Comment period for 2018 UGA #2 not sufficient for UGA #3	<ul style="list-style-type: none"> Noted Public comment period included two Planning Commission Public Hearings spanning over 115 days
20	Stromstad, Caleb	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Requests PC to ask Council to consider comments from developers	<ul style="list-style-type: none"> Noted Public Hearings provided comment opportunity for the public, and private stakeholders
21	Stromstad, Caleb	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Olberding Property; commercial allocated to artificially manipulate traffic study	<ul style="list-style-type: none"> Comprehensive Plans are required to include a Transportation Element which addresses Demand-Management Strategies (RCW 36.70A.070(6)(vi) and encouragement of community access (RCW 36.70A.070(6)(vii))

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						<ul style="list-style-type: none"> The Washington State Department of Transportation identifies land-use zoning supportive of transit/multi-modal travel as a strategy of Transportation Demand Management and Practical Solution via their 2019-2023 TDM Strategic Plan The Travel Demand Forecast must be consistent with the Regional Travel Demand Model assumptions (policy and land-use) of the Metropolitan Planning Organization (Benton-Franklin Council of Governments) Assumptions (inputs) for Regional Travel Demand Modeling undergo rigorous evaluations via the MPO Board and Technical Advisory Committee and include stakeholders from jurisdictions and public agencies Land Use diversity is generally regarded and supported as a responsible, practical and beneficial consideration as indicated by the US Department of Transportation, Federal Highway Administration and Environmental Protection Agency
22	Greeno, Dave	5/21/2020	UGA	Verbal Comment @ 5/21 PC	20-30% of UGA properties do not want to sell (develop)	<ul style="list-style-type: none"> Noted Property owner reserve rights to sell and/or develop
23	Greeno, Dave	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Kohler Property should be included in UGA	<ul style="list-style-type: none"> The site is currently located one mile north of the existing Urban Growth Area and identified as leap-frog development violating the Growth Management Act (PSC/JG)
24	Greeno, Dave	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Want to bring city water to Burns / Kohler Road / Dent	<ul style="list-style-type: none"> The site is currently located one mile north of the existing Urban Growth Area violating the Growth Management Act
25	Greeno, Dave	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Olberding Property should be residential, not commercial	Request noted

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26	Dockstader, George	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Concerned about traffic on Road 68; Road 68 should be 5 lanes to Clark Road	<ul style="list-style-type: none"> Expansion and improvements of infrastructure, including transportation roadways will be required as development occurs and as identified in PMC 12.36 (Concurrency) Capacity improvements on Road 68 are planned via requirements ROW dedications as development occurs
27	Dockstader, George	5/21/2020	UGA	Verbal Comment @ 5/21 PC	BPA Power Line on Olberding Property	<ul style="list-style-type: none"> Noted Applicants are required to obtain necessary permits and or/permissions prior to development of property
28	Dockstader, George	5/21/2020	UGA	Verbal Comment @ 5/21 PC	20% of proposed UGA (both sides of RD 68 (farmer)) will not develop	Noted
29	Dockstader, George	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Supports Alternative #2	Noted
30	Dockstader, George	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Alternative #3 is too compact; Avg buyer wants 3 car garage + RV/Boat, not small lots	<p>RCW36.70A.020 (GMA Planning Goals) require Comprehensive Plan to reduce sprawl, concentrate urban growth and support multi-modal transportation and efficient systems</p> <p>A 1.95 (Autos per HH) per the 2015 American Community Survey was utilized</p> <p>The Comprehensive Plan aims to create housing choices for all segments of population in Pasco. Land uses will allow housing types ranging from single family homes in a relatively lower density to medium density. It will also allow other housing types such as townhomes, condominiums, apartments, etc. These will allow homes available for purchase by first time home buyers, single occupants, families, retirees, empty nesters etc.</p>

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31	Olberding, Fred	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Gave easement to Port of Pasco in UGA #2, was not notified on UGA #3	<ul style="list-style-type: none"> Noted Scoping notice of the EIS (Fall 2018) indicated an additional UGA Alternative (#3) focused on a Compact Growth Target in compliance with the Growth Management Act
32	Olberding, Fred	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Sold land to PSD; commercial land will not be supported; Kau Trail Road is not up to standard	<ul style="list-style-type: none"> Noted 38% of residential growth and housing is expected to occur in the expanded Urban Growth Area Additional Commercial Land Use is necessary to accommodate job growth and services required by added growth Improvements to the transportation system are required as development occurs; Kau Trail and any impacted existing or planned roadways will be evaluated and improved to not fall below established regional Level of Service Standards
33	Olberding, Fred	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Traffic implications; improvements needed	<ul style="list-style-type: none"> Expansion and improvements of infrastructure, including transportation roadways will be required as development occurs and as identified in PMC 12.36 (Concurrency)
34	Olberding, Fred	5/21/2020	UGA	Verbal Comment @ 5/21 PC	People will not travel to commercial designation on Olberding property	<ul style="list-style-type: none"> Noted Providing additional commercial land use within closer proximity to existing residential and planned residential growth will increase opportunities for households to access goods and services A mix of land-uses is also supportive of RCW 36.70A.108 (Transportation Element) which requires Comprehensive Plans to include and promote multi-modal transportation options

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35	Mullen, Randy	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Owens property along RD 68, has a buyer ready to develop to commercial (Health facility)	Noted; Staff updating Future Land Use designation for this area
36	Bauman, Steve	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Who defines what is inappropriate conversion of ag lands to sprawling low density development	See responses to comment # 68
37	Bauman, Steve	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Did EIS ask for public comment	The Draft Environmental Impact Statement was issued on May 15, 2020. The public comment period was extended through July 31, 2020.
	Bauman, Steve	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Developers/Real estate have a stake, and must be included in process	Noted. Members of the public, including private developers and real-estate professionals are able to participate and provide feedback and/or comments via the normally scheduled public hearings for all items related to the Comprehensive Plan, Comprehensive Plan Environmental Impact Statement and Urban Growth Area application.
38	Laird, Charles	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Not informed about decision to remove partial property out of the UGA	Scoping notice of the EIS (Fall 2018) indicated an additional UGA Alternative (#3) focused on a Compact Growth Target in compliance with the Growth Management Act Met with applicant in February 2020 and phone discussion with applicant in April discussing UGA revisions
39	Laird, Charles	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Requests all 120 acres from Alt #2 to be included in Alt #3	Noted
40	Fickes, Mark	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Alt #3 has not had adequate public participation in accordance with RCW 36.70A.035	<ul style="list-style-type: none"> Notices of the Draft Future Land Use Map and Urban Growth Area were sent to property owners in February, April and May 2020 and published on the Public Notice of the City Website meeting requirements of RCW 36.70A.035 Public review of the Urban Growth Area began

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						at the March 19 th , 2020 Planning Commission Public Hearing, the Urban Growth Area has been a workshop item for the Pasco Planning Commission and City Council nine separate occasions referencing a reduced UGA was likely
41	Fickes, Mark	5/21/2020	UGA	Verbal Comment @ 5/21 PC	PC Hearing should not have occurred until after EIS comment period ended	<ul style="list-style-type: none"> Comprehensive Plan DEIS comment period was extended through July 31, 2020. An action by the Pasco City Council will not occur prior to the issuance of a final EIS.
42	Fickes, Mark	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Olberding Property; no evidence of 30 acres should be commercial not residential; no demand for it; Burns Road is not arterial; remove c-designation; violates various GMA;	<ul style="list-style-type: none"> Opportunities for commercial lands necessary to provide access to future neighborhood businesses, services, retail, food/accommodation services 75% of residents living in Pasco travel to employment outside of the City Limits (per Census LODS 2017) Lack of commercial within the City may add to congestion and vehicle miles/hours traveled on arterials and Interstate Systems and would not meet RCW 36.70A.020(3)
43	Fickes, Mark	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Kohler; 104 acres of "prime" residential; client thought it was going to be included; property is ready to be developed; owner does not to farm	See response to comment #42
44	Port of Pasco; Randy Hayden	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Supports Alternative #3	Noted
45	Stromstad, Caleb	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Kohler property, developer will extend water; requests PC to review submitted letters	<ul style="list-style-type: none"> Public facilities are not identified in the Draft Comprehensive Plan, or ongoing Amendment of the Comprehensive Sewer Plan
46	Dockstader, George	5/21/2020	UGA	Verbal Comment @ 5/21 PC	No real-estate, HBA, developers/land owners allowed to comment since 2018	<ul style="list-style-type: none"> Public review of the Urban Growth Area began at the March 19th, 2020 Planning Commission Public Hearing. The Urban Growth Area has been a workshop item for the Pasco Planning Commission and City Council multiple times

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						<p>(from 2018 to 2020) referencing a reduced UGA was likely</p> <ul style="list-style-type: none"> The City has not restricted comments from any individuals, agencies, organizations or associations
47	PC - Myhrum	5/21/2020	UGA	Verbal Comment @ 5/21 PC	Are tailored/custom modifications allowed to Land Use, are they based on capacity?	<ul style="list-style-type: none"> Modifications to the Land Use designations are allowed and conducted annually through the Comprehensive Plan Amendment Process outlined in PMC 25.215.020
48	Kenricks, Terri	6/8/2020	Comp Plan	Social Media Comment (FB) @ 6/8 Council WS	Update on cannabis sales	<ul style="list-style-type: none"> Marijuana production, processing and retail sales are prohibited per Ordinance 4166 passed by the Pasco City Council on July 21, 2014
49	Wright-Mockler, Dylan	6/8/2020	Comp Plan	Social Media Comment (FB) @ 6/8 Council WS	What is being done to ensure commercial areas and parks are within safe/walkable areas for residents?	<ul style="list-style-type: none"> The Future Land Use Map has indicated increased diversity of land use and public/quasi-public spaces in the expanded Urban Growth Area The City already has a complete street standard in place that promotes walkability The City is evaluating ongoing and future amendments to the zoning code and development standards to increase walkable, efficient and multi-modal opportunities safe and accessible for all users and modes
50	Martin, Joni	6/8/2020	Comp Plan	Social Media Comment (FB) @ 6/8 Council WS	Please discuss planned city-owned parks that break up the long wall lined corridors that are already prevalent in the Broadmoor development area and along Sandifur and Burden. Please break up large tracts of single family homes with pockets of multi-use multi-family and commercial spaces. Open spaces with trees and parks and play spaces like Volunteer Park and Chiawana Park are vital to building community in these new areas	<ul style="list-style-type: none"> The City has ongoing Code Amendments to the Pasco Municipal Code to address comments Code Amendment: 2019-013 Street Connectivity Code Amendment: 2020-001 and 2020-002 for "missing middle" housing House Bill 1406 and House Bill 1923: City was successful in applying and receiving funding to address affordable housing and missing middle

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						housing to increase residential building capacities
51	Confederated Tribes of the Colville Reservation	6/1/2020	DEIS	Exhibit #H - DEIS/UGA	Pasco Cultural History, Paragraph 4 (page 54): Please strike the following language: "Pasco is in the traditional territory of the Yakama Nation, a Sahaptin-speaking Plateau people (Walker 1998). Wanapum and Walla Walla people also used the area (Kersher 2008)." We offer the following language as a substitute: "Pasco is in the traditional territory of the Palus tribe, a constituent tribe of the Confederated Tribes of the Colville Reservation. It is also in the 1855 ceded lands of the Yakama Nation, additionally the Wanapum Band of Priest Rapids and the Walla Walla tribe also utilized the area extensively. All are Sahaptin-speaking Plateau people."	Update as suggested
52	Confederated Tribes of the Colville Reservation	6/1/2020	DEIS	Exhibit #H - DEIS/UGA	Pasco Cultural History, Paragraph 8 (page 55): Please strike the following language: "Fourteen tribes and bands signed the Yakama Nation Treaty of 1855 that established the Yakama Indian Reservation (Yakima Nation Museum [YNM] 2011). The same year, the Wa1la Walla tribe signed the Treaty of Walla Walla, which established the Umati1la Indian Reservation in Oregon, and many Walla Walla (and some Yakama) tribal members moved to there."	Update as suggested

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53	Confederated Tribes of the Colville Reservation	6/1/2020	DEIS	Exhibit #H - DEIS/UGA	Pasco Cultural History, Paragraph 10 (page 55): Please amend the following sentence by adding the language in italics: "The general Tri-Cities region as a whole is within territory inhabited traditionally by Native people represented today by the Confederated Tribes of the Colville Reservation, Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Umatilla Indian Reservation, and the Wanapum Band of Priest Rapids.	Update as suggested
54	Confederated Tribes of the Colville Reservation	6/1/2020	DEIS	Exhibit #H - DEIS/UGA	Recorded Cultural Resources (page 55): Please amend the following sentence by adding the language in italics: Many archaeological sites, Native American traditional places, and historical structures related to the area's cultural history have been recorded in the City."	Update as suggested
55	Confederated Tribes of the Colville Reservation	6/1/2020	DEIS	Exhibit #H - DEIS/UGA	Previously Conducted Cultural Resource Review, Paragraph 3 (page 56): Please strike the following sentence "The 13 sites within the one-mile radius contain an array of litchis, shell, burials, irrigation pipes, and one was designated as a field camp". We offer the following language as a replacement: "Native American burials are identified within this radius." There are also archaeological shell deposits, irrigation features, and an archaeological camp.	Update as suggested
56	Halverson_Fick esM_Olberding	6/10/2020	DEIS	Exhibit #I - DEIS/UGA	<ul style="list-style-type: none"> From comments made at the last Planning Commission hearing on May 21, 2020 (in which this office and client representatives actively participated), it is clear that City Staff is advocating for the adoption of Alternative #3 summarized in the DEIS without change. Our clients are and continue to be opposed to the suggestion by City Staff and its consultants that there should be a 30-acre commercial development in the middle of a low-density 	<ul style="list-style-type: none"> Requested (Land Use) change noted Providing lands for job growth, neighborhood commercial services (retail, business, etc) provide existing residential communities alternative opportunities for commerce without overloading existing congested corridors Creating neighborhood commercial areas to accommodate new jobs was identified in the SOMOS Pasco ((Economic Strategic Vision)

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					<p>residential area next to a future school site.</p> <ul style="list-style-type: none"> Our clients continue to request that the entire 80-acre parcel of property within the City's proposed UGA remain designated Low Density Residential and not Commercial as proposed by Staff. 	<p>based on stakeholders including representatives from the Port of Pasco, City of Pasco, Franklin County, Columbia Basin College, Tri-Cities Hispanic Chamber of Commerce and Pasco Chamber of Commerce</p> <ul style="list-style-type: none"> Per established Comprehensive Plan Goals, Policies, Growth Management Act requirements, staff is not in violation of RCW 36.70A.020(6); providing commercial areas for residential communities to access is appropriate and responsible planning
57	Halverson_Fick esM_Olberding	6/10/2020	DEIS	Exhibit #I - DEIS/UGA	<ul style="list-style-type: none"> As an initial matter, this office and our client is concerned about the Planning Commission's practice of limiting public comments on the City's UGA to 3 minutes. We believe this violates the spirit and intent of the GMA which is "early and continuous" public participation in the process. RCW 36.70A.140. The Planning Commission and City as a legal matter should not have held hearings on Comprehensive Plan Amendment Alternative #3 until the comment period on the DEIS had expired. It is axiomatic under SEPA that governmental action should not be taken or finalized until the impacts of any proposal are complete. Alternative #3, which included a smaller UGA boundary and different designations was not finally developed until the DEIS was published on May 15, 2020. 	<ul style="list-style-type: none"> The Washington State Open Public Meetings Act (RCW 42.30) allows the authority (Planning Commission) to limit the time of speakers to a uniform amount Concerns Noted Council Action on the urban growth area change has been revised to follow after the issuance of the Final EIS of the Comprehensive Plan
58	Halverson_Fick esM_Olberding	6/10/2020	DEIS	Exhibit #I - DEIS/UGA	<ul style="list-style-type: none"> This office and numerous client representatives credibly testified that the Property owner or builder/developer associations were not contacted about the significant changes between Alternative #2 and #3 	<ul style="list-style-type: none"> Notices of the Draft Future Land Use Map and Urban Growth Area were sent to property owners in February, April and May 2020 and published on the Public Notice of the City Website meeting requirements of RCW

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						36.70A.035
59	Halverson_Fick esM_Olberding	6/10/2020	DEIS	Exhibit #I - DEIS/UGA	<ul style="list-style-type: none"> There is no demand or support for a commercial island on 30 acres of our clients' property The Property could not be economically developed for commercial use Commercial designation is inconsistent with GMA goals 	<ul style="list-style-type: none"> Property is surrounded by existing residential and planned increased residential growth Opportunities for commercial lands necessary to provide access to future neighborhood businesses, services, retail, food/accommodation services Growth Management Goals (RCW 36.70A.020) require Concentrated Urban Growth and the Reduction of Sprawl, particularly reducing the conversion of undeveloped land into sprawling, low-density development SOMOS Pasco, the Greater Pasco Area Economic Strategic Vision (2017) indicated an interest and priority to increase consumer services by creating planned retail and specialty services/centers accessible to residential neighborhoods and communities
60	Halverson_Fick esM_Olberding	6/10/2020	DEIS	Exhibit #I - DEIS/UGA	<ul style="list-style-type: none"> Notice of the New Commercial Designation Affecting Only the Olberding Property was not Properly Given. Our clients were not provided the legal notices required by due process and the GMA. Under the GMA, local governments are required to provide both "early and continuous public participation in the development and amendment of comprehensive land use plans" (RCW 36.70A.140) The notice provided must be "reasonably calculated to provide notice to property owners and others affected (RCW 36.70A.035). 	<ul style="list-style-type: none"> Notices of the Draft Future Land Use Map and Urban Growth Area were sent to property owners in February, April and May 2020 and published on the Public Notice of the City Website meeting requirements of RCW 36.70A.035 Public review of the Urban Growth Area began at the March 19th, 2020 Planning Commission Public Hearing. The Urban Growth Area has been a workshop item for the Pasco Planning Commission and City Council multiple times (from 2018 to 2019) referencing a reduced UGA was likely
61					<ul style="list-style-type: none"> The Proposed Commercial Designation is Illegal and Violates GMA On our client's property, there is only a demand 	Comprehensive Plan DEIS comment period extended through July 31, 2020. An action by the Pasco City Council will not occur prior to the

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					and potential for residential development, not commercial development.	comment period ends
62					<ul style="list-style-type: none"> The Planning Commission, and Other GMA Decision Makers Clearly Have the Power to Modify Alternative #3 At the Planning Commission hearing, our office was concerned with Planning Staff suggestions that changes to proposed Alternative #3 should not (or cannot) be made or considered. This simply is incorrect. 	<ul style="list-style-type: none"> Noted PMC 2.45.040 provides powers and duties of the Pasco Planning Commission (PSC/JG)
63	Futurewise	6/17/2020	UGA	Exhibit #J - UGA	Do not plan increased residential around Tri-Cities Airport; Limits future expansion of airport runway; new residential will be impacted by airport noise/flights; long range airport operations will become difficult with adjacent residential development	<p>The City is proposing the site in question (Parcel #114250016) to have two Land Uses – Low Density Residential (approx. 80%) and Airport Reserve (approx. 20%). The City is working with the property owner to preserve the Airport Reserve Area to be in strict compliance with the Airport Overlay Zones per Pasco Municipal Code 25.190.090</p> <p>The Site will be regulated by Zone 2 and Zone 4 standards which limit residential densities and permitted uses. The Low Density Residential Land Use can be applied with a Planned Unit Development which requires 15% open space.</p> <p>The City intends to coordinate any development of this site with the Port of Pasco, the Washington State Department of Transportation and other stakeholders of aviation.</p>
64	Futurewise	6/17/2020	UGA	Exhibit #J - UGA	Include compact urban growth areas with amenities, natural resource lands	<ul style="list-style-type: none"> Noted Alternative #3 increased residential and commercial land mix, specifically accommodating appropriate residential densities The agricultural lands within the identified

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						UGA areas, while not of long-term commercial significance, can remain under cultivation until such time that they are brought into the City.
65	Futurewise	6/17/2020	UGA	Exhibit #J - UGA	Design walkable neighborhoods with densities and mix of zoning to support local businesses and safe streets, bike lanes and frequent transit supporting environmental and community health, reduce traffic congestion	<ul style="list-style-type: none"> • Noted • Planning Department has numerous code amendments underway and planned to address increased residential densities, creating additional mixed-use areas and corridors to support multi-modal transportation and walkable communities • The Transportation System Master Plan is expected to be completed by Spring 2021 • See response to comment #49 above. Traffic has been analyzed and improvements have been proposed. See Transportation Element of the Comprehensive Plan and maps T-1 through T-11 in Appendix A of the Comprehensive Plan.
66	Futurewise	6/17/2020	UGA	Exhibit #J - UGA	Provide long-term capital facilities plan to ensure that existing tax payers in Pasco do not subsidize new neighborhoods	<ul style="list-style-type: none"> • See response to comment # 7 above • The Capital Facilities Plan for the Urban Growth Area Expansion also included an Expanded Infrastructure Evaluation identifying projects, costs and sources of funding for associated facility improvements • The Comprehensive Plan includes the Capital Facilities Element identifying a short and long-range project lists with costs, sources of revenue, funding and fees
67	Futurewise	6/17/2020	UGA	Exhibit #J - UGA	Reinvestment in neighborhoods and businesses; Downtown Pasco	<ul style="list-style-type: none"> • The City continues to work with and provide monetary support to the Downtown Pasco Development Authority • The City coordinates economic development efforts with the Port of Pasco • The SOMOS Pasco effort was included in the Comprehensive Plan to reference identified

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						priorities and strategies to increase economic development opportunities, investments and support to Downtown Pasco and the general Pasco area
68	Futurewise	6/17/2020	UGA	Exhibit #J - UGA	Proposed UGA expansion paves over working farms designated by Franklin County as agricultural lands of long-term commercial significance	<ul style="list-style-type: none"> Both alternatives 2 and 3 would impact existing lands under cultivation, however neither alternative 2 or 3 UGA areas would affect Franklin County-designated agricultural lands of long-term significance. The areas identified are classified by the County as Rural Residential, Rural Shoreline or Agriculture, a more general designation that includes both lands of long-term commercial significance and those that are not. In the area identified for alternatives 2 and 3, the County map does not show the County-designated prime irrigated, prime dryland or Fields with Quincy soils (i.e., agricultural lands of long-term commercial significance). We have also confirmed this understanding with the County that the alternatives do not impact County-designated agricultural lands of long-term commercial significance.
69	Futurewise	6/17/2020	UGA	Exhibit #J - UGA	Proposed UGA expansions will interfere with future expansions of the Tri-Cities Airport and bring residences closer to the airport, making operations more difficult and adversely impacting new residents	See response to comment # 63.
70	Futurewise	6/17/2020	UGA	Exhibit #J - UGA	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 (WAC197-11-070(1))	<ul style="list-style-type: none"> The Public Comment period for the Draft EIS was extended through July 31, 2020 Adoption of the Comprehensive Plan and Urban Growth Area have been revised to meet requirements of WAC 197-11-070(1)

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71	Saget, Pierre	6/17/2020	UGA	Exhibit #K - UGA	<ul style="list-style-type: none"> • Protect agricultural lands and do not expand into farmlands; • Do not plan for increased residential development around the Tri-Cities Airport; • Ensure compact UGA that are well designed and well furnished with amenities; • Design walkable neighborhoods, with densities and a mix of zoning to support local businesses and safe streets with bike lanes and frequent transit to promote environmental/community health and reduce congestion; • Provide long-term Capital Facilities Plan that will ensure that existing tax payers do not subsidize new development; • Reinvest in existing neighborhoods and business; Downtown Pasco 	<ul style="list-style-type: none"> • Noted • The Implementation of the Comprehensive Plan will identify a series of existing, planned and future development regulation modifications to ensure compliance with the Growth Management Acts Planning Goals including the protection of public facilities, environment, land use and zoning and multi-modal transportation impacts. • Farmland – Farmlands are not designated as agricultural lands of long term commercial significance. Some farmlands would be impacted to accommodate future growth. However, development will not occur in the immediate future, and property owners will be able to continue farming until such land is annexed to the City. • Airport – See response to Comment 63 • Compact UGA – Alternative 3 has been developed to provide a compact development scenario. Also the Capital Facilities Plan for the UGA indicates public facilities and improvements needed. • Walkable neighborhood – see comment response # 49 • Existing tax payers – see comment response # 7 • The Economic Development Element of the Comprehensive Plan focusses on improving existing businesses including downtown businesses.

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72	Nelson, Lisa	6/18/2020	UGA	Exhibit #L - UGA	Protect agricultural lands and do not expand into farmlands; Do not plan for increased residential development around the Tri-Cities Airport; Ensure compact UGA that are well designed and well furnished with amenities; Design walkable neighborhoods, with densities and a mix of zoning to support local businesses and safe streets with bike lanes and frequent transit to promote environmental/community health and reduce congestion; Provide long-term Capital Facilities Plan that will ensure that existing tax payers do not subsidize new development; Reinvest in existing neighborhoods and business; Downtown Pasco	See comment response #71 above
73	Sanchez, M	6/18/2020	UGA	Exhibit #M - UGA	Please plan for complete, connected and walkable neighborhoods	<ul style="list-style-type: none"> Planning Department has numerous code amendments underway and planned to address increased residential densities, creating additional mixed-use areas and corridors to support multi-modal transportation and walkable communities The Transportation System Master Plan is expected to be completed by Spring 2021 Street Connectivity Code Amendment is currently going through the public hearing process, anticipated Council action in the Fall 2020
74	Spokkeland, Jon	6/17/2020	UGA	Exhibit #N - UGA	Too much commercial lands designated in Alternative #3; Current market requires 15 acres of commercial for every 1k households; Future demand for commercial space may be lower due to shift to online retail; Favors Alt #3 with reduced commercial	<ul style="list-style-type: none"> Noted Franklin County has significantly smaller Jobs to Households balance, which has increased the need for workers to commute outside of Pasco for work. This has increased commute times and congestion on local and interstate systems Increasing commercial opportunities may mitigate future lack of jobs and services necessary for residential growth

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75	Wilson, Dave	6/10/2020	DEIS	Exhibit #A - DEIS	Owns property SW of Road 100/Chapel Hill Blvd; Property is currently developed with commercial (banks, credit union); Future Land Use designates as MHDR; Requests change to Commercial	City to update the map and related tables/land use inventory
76	TLP (Bob Tippet)	6/15/2020	DEIS	Exhibit #B - DEIS	Clarify discrepancies in Industrial totals on table 4 and table 5	<ul style="list-style-type: none"> Noted Tables will be adjusted and corrected
77	TLP (Bob Tippet)	6/15/2020	DEIS	Exhibit #B - DEIS	Requesting the inclusion of 120 acres of TLP property in Alt #3 to meet GMA Goals	<ul style="list-style-type: none"> Request noted City has held discussions with applicant/property owner
78	Carosino, Robert	6/15/2020	DEIS	Exhibit #C - DEIS	DEIS does not adequately analyze additional scenarios to Alt #2 or Alt #3; DEIS does not adequately address environmental/socioeconomic impacts of proposed actions	<p>SEPA is different from NEPA, in the scope of items that need to be considered. The EIS will be reviewed to see if there are areas to supplement the evaluation of environmental impacts but socioeconomic impacts evaluation is not required. In WAC 197-11-448 ...SEPA contemplates that the general welfare, social, economic, and other requirements and essential considerations of state policy will be taken into account in weighing and balancing alternatives and in making final decisions. However, the environmental impact statement is not required to evaluate and document all of the possible effects and considerations of a decision or to contain the balancing judgments that must ultimately be made by the decision makers. Rather, an environmental impact statement analyzes environmental impacts and must be used by agency decision makers, along with other relevant considerations or documents, in making final decisions on a proposal. The EIS provides a basis upon which the responsible agency and officials can make the balancing judgment mandated by SEPA, because it provides information on the environmental costs and impacts. SEPA does not require that an EIS be an agency's only decision making document. (2)</p>

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						<p>The term "socioeconomic" is not used in the statute or in these rules because the term does not have a uniform meaning and has caused a great deal of uncertainty. Areas of urban environmental concern which must be considered are specified in RCW 43.21C.110 (1)(f), the environmental checklist (WAC 197-11-960) and WAC 197-11-440 and 197-11-444. (3) Examples of information that are not required to be discussed in an EIS are: Methods of financing proposals, economic competition, profits and personal income and wages, and social policy analysis (such as fiscal and welfare policies and nonconstruction aspects of education and communications). EISs may include whether housing is low, middle, or high income.</p> <p>Definition of terms ... The list of elements of the environment shall consist of the "natural" and "built" environment. The elements of the built environment shall consist of public services and utilities (such as water, sewer, schools, fire and police protection), transportation, environmental health (such as explosive materials and toxic waste), and land and shoreline use (including housing, and a description of the relationships with land use and shoreline plans and designations, including population).</p>
79	Carosino, Robert	6/15/2020	DEIS	Exhibit #C - DEIS	Requests DEIS comment period be extended additional 60 days	<p>The Draft EIS Comment period was extended through July 31, 2020. The DEIS was issued on May 15, 2020 for a total public comment period of 77 days.</p> <p>Per WAC-197-11-455(6): Any person or agency shall have thirty days from the date of issue in which to review and comment upon the DEIS</p>

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80	Carosino, Robert	6/15/2020	DEIS	Exhibit #C - DEIS	Section 3.1.2; Traffic Analysis is not complete, no discussion of traffic impacts presented with facts and/or figures; no discussion of future projects	<ul style="list-style-type: none"> Traffic analysis is discussed in the Transportation Element of the Draft Comprehensive Plan. The Transportation Element includes proposed improvement projects for both the short and long-range periods. Comprehensive Plan Map Folio Transportation Maps T1-T12 contain existing conditions and transportation forecasts. Analysis of deficiencies is in Volume II, pages 104-117 and includes Table 10 and Table 11.
81	Carosino, Robert	6/15/2020	DEIS	Exhibit #C - DEIS	Encourage development/change zoning in Central Pasco	<ul style="list-style-type: none"> Noted City will evaluate any proposed or identified changes to development and growth strategies with the Downtown Pasco Development Authority and neighborhood community members
82	Carosino, Robert	6/15/2020	DEIS	Exhibit #C - DEIS	DEIS does not discuss recreational needs, and park planning	SEPA requires evaluation of alternatives related to environmental effects. However the EIS does address recreation and parks through: 1) identifying existing park and open space lands and how each alternatives would modify or increase additional park and open space area (see Sections 3.2 and 4.1.1 and others and; 2) affected environment descriptions and mitigation measures (see Sections 4.4.3, 4.7 and 4.8)
83	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	DEIS is not adequate and violates SEPA and WAC 197-11-070; Until the Final EIS is issued, the City cannot choose an expanded UGA request to Franklin County	<ul style="list-style-type: none"> Council action on the Urban Growth Area will not occur until after the issuance of the Final EIS of the Comprehensive Plan is made available
84	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	Page b of the factsheet includes information on the availability of the Draft EIS. Hispanic or Latino persons make up 55.1 percent of the City of Pasco's population. Of the population over five years of age, 50.4 percent speak a language other than English at	<ul style="list-style-type: none"> Noted Staff evaluating appropriate measures to address and provide information on the Comprehensive Plan for Spanish only speakers

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					<p>home.</p> <p>So we appreciate and support that the Public Participation Plan for the City of Pasco 2018 Comprehensive Plan provides on page 5 that "efforts will be made to provide notices in English and Spanish."</p> <p>Also, given the high percentage of the population in the City of Pasco speaking a language other than English at home, we recommend that versions of the draft comprehensive plan and the final EIS be made available in Spanish and the public participation efforts should reach out to the Hispanic and Latinx population in addition to the population as a whole.</p>	
85	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	Last Sentence, Page 2: Pasco and Franklin County are required to update Comp Plans/Dev Regulations every eight years	Will be updated as suggested
86	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	Table 2 Existing Residential Capacity (page 5) It would helpful to include a reference to a more detailed description of how the existing residential capacity in Table 2 was determined. The City of Pasco is also considering the adoption of legislation to allow more "Missing Middle" housing in the city which Futurewise strongly supports. We recommend that the EIS include an estimate of the increased housing capacity this legislation will create.	References to the Land Capacity Analysis will be added before table 2

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87	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	<p>3.2. Comparison of Alternatives to GMA Goals (pages 13 - 16)</p> <p>The GMA transportation goal discussion on page 14 does not disclose that Alternatives 2 and 3 do not have densities sufficient to support transit citywide, an important element of a multimodal transportation system. While transit is especially important to the three percent of Pasco's occupied housing units that do not have access to a vehicle and residents of other households that are too young or otherwise do not drive, all Pasco residents and businesses benefit from increased transportation choices. Parts of the City of Pasco have a very high proportion of households that lack access to private vehicles compared to Washington State as a whole. Public transit is particularly important in those parts of the city.</p> <p>The GMA housing goal discussion on page 14 does not disclose the impacts of allowing residential uses so close to the Tri-Cities Airport and the adverse impacts this will have on the planned housing.</p> <p>The Draft EIS does not disclose the economic impacts of the loss of this agricultural land of long-term commercial significance. The economic development goal discussion on page 14 does not disclose the impacts of allowing residential uses so close to the Tri-Cities Airport and the impacts of the limited expansion opportunities created by the UGA expansion and residential zoning in the vicinity of the airport.¹¹ These impacts are inconsistent with RCW 36.70A.020(5).</p>	<p>Alternative 3 was developed to accommodate a higher density. The land use in this alternative was developed to have higher density and clusters to be better served by a multi modal system. Also, the Comprehensive Plan Transportation Element goals aim to achieve a multimodal transportation system.</p> <p>For airport land use, see comment response # 63</p> <p>None of the alternatives would result in loss of agricultural land of long term commercial significance. See comment response # 68 above</p>

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88	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	There is no analysis as to the consistency of the proposed comprehensive plan with RCW 36.70A.020(8), the GMA natural resource industries goal. RCW 36.70A.020(8) requires the City of Pasco to "maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forestlands and productive agricultural lands, and discourage incompatible uses." Since most of the land proposed for the UGA expansions is designated as agricultural resource lands of long-term commercial significance the comprehensive plan update is inconsistent with RCW 36.70A.020(8). The failure to disclose this inconsistency anywhere in the Draft EIS is a serious SEP A violation.	See response above in comment #s 68 and 87
89	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	The GMA open space and recreation goal discussion on page 15 does not disclose the impacts of converting agricultural and rural land to relatively low-density residential uses. The GMA environment goal discussion on page 15 also does not disclose the environmental impacts of converting agricultural and rural land to relatively low-density residential uses. These impacts include a loss of farmland, reduced storm water recharge to ground water, increased storm water runoff, increased greenhouse pollution, and loss of wildlife habitat on rural and agricultural land. These impacts are inconsistent with RCW 36.70A.020(9) and (10).	Update description of Alternative 3 to note the open space and park area identified in the Broadmoor area; also update environment goal discussion on page 15 to note this open space area for alternatives 2 and 3. See also footnote 1 to Table 5 (1. About 40 acres of parks, 160 acres of land for school facilities and additional public lands are included in the Low Density Residential land use acres. Locations to be identified at a later phase with the land use changes.) Additionally, note farmland will be converted to several different types of uses – residential, commercial, industrial land, parks and public lands. And that development will be phased with agricultural land available to remain in production until the time of development. Also see comment response #68.

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						<p>Discussion of stormwater recharge and stormwater runoff effects is characterized in the EIS in sections 4.2.2, 4.2.3, 4.3.3 and 4.10.1; greenhouse pollution discussion will be added in the final EIS, and measures for conserving fish and wildlife habitat effects are characterized in Sections 4.2.3 and 4.3.3.</p> <p>City of Pasco Resolution 3853 adopted Greenhouse Gas Reduction Policy (2018)</p>
90	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	<p>The GMA historic preservation goal discussion on page 16 does not disclose that the city's planning and regulations focus on known archaeological and cultural sites. 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.</p> <p>The predictive model shows that Pasco and the UGA expansion areas have a "high risk" and "very high risk" of cultural resources in these areas. H Land development can adversely impact these resources and this adverse impact on actual but currently unidentified cultural resources is not disclosed. This impact is inconsistent with RCW 36.70A.020(13).</p>	<p>City regulations are protective of both known and unidentified archaeological and cultural sites. If during construction a site is encountered, the City has. In summary, the City believes its efforts are consistent with the GMA historic preservation goal.</p>
91	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	<p>DEIS does not mention probable environmental impacts or consequences of agency actions, and is inconsistent with GMA Goals, DEIS is not adequate</p>	<p>Headings in Section 4 and associated discussion for the various environmental elements will be clarified to identify that the effect being discussed are probable environmental impacts.</p>

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92	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	DEIS does not disclose UGA Land expansion includes prime farmland; DEIS does not disclose that UGA expansion includes 2,209 acres of farmland of statewide significance; UGA includes 83.5% of prime / farmland; No Mitigation was disclosed in the DEIS; DEIS is not adequate	<p>See comment responses above in # 68.</p> <p>Additionally, Section 4.4.2 characterizes that for alternatives 2 and 3, there will be impacts to agricultural lands from land conversion, as development would occur in the two different UGA areas described. Because this land is not agricultural lands of long-term commercial significance, and because more specific analysis of lands would occur at the time of development, a more detailed characterization of these lands was not deemed necessary.</p> <p>Alternative 3 reduces lands included in the UGA and includes more redevelopment and infill development within the existing city limits. Additionally, the bringing in of lands within the UGA into the City limits will occur through a phased approach. The agricultural lands impacted, while not of long-term commercial significance, can remain under cultivation until such time that they are brought into the City. Discussion of mitigation in the EIS will be updated to more clearly reflect these mitigation measures in appropriate locations. City intends to work with the County on development phasing that would protect land currently being used for farming from immediate development. City has removed approximately 137 acres of ag land from the UGA expansion proposal in Alternative 3. These mitigation measures will be added in the Final EIS.</p>

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93					<p>4.1. Earth (pages 17 to 20) and Summary of Impacts by Alternative 4.2.1. Earth (page 58) Two letters commenting on the scope of the EIS requested that the EIS examine impacts on agricultural land. However, the Draft EIS does not disclose that the land proposed for the UGA expansions includes 694.7 acres of prime farmland. This is 20 percent of the UGA. expansions. The Draft EIS also does not disclose that UGA expansions also include 2,203.9 acres of farmland of statewide importance. This is another 63.5 percent of the UGA expansion?</p> <p>Together the prime farmland and farmland of statewide importance cover 2,898.6 acres and 83.5 percent of the proposed UGA expansions. Franklin County designates prime farmland and farmland of statewide importance as agricultural lands of long-term commercial significance. This was also not disclosed in the Draft EIS. The Draft EIS also does not disclose that the prime farmland and farmland of statewide importance will be converted to urban uses by Alternatives 2 and 3. No mitigation is proposed for these undisclosed adverse impacts. The adequacy of an EIS "is assessed under the 'rule of reason' ... which requires a reasonably thorough discussion of the significant aspects of the probable environmental consequences of the agency's decision. The failure to even mention these significant adverse impacts on agricultural soils means that the Draft EIS is not adequate.</p>	<p>See responses to comments #s 68 and 92 above.</p> <p>The county conducted a County-wide agricultural lands of long-term commercial significance review as part of the 2008 update and the lands included in Alternatives 2 and 3 are not designated resource lands of long-term commercial significance. See Map 8 of the County's existing Comprehensive Plan.</p> <p>Section 4.4.2 characterizes that for alternatives 2 and 3, there will be impacts to agricultural lands from land conversion as development would occur in the two different UGA areas described. Section 4.10.2 also describes for alternatives 2 and 3, increase in intensity from the current agricultural land uses to various other uses. Additional description to be added in Section 4.4</p>

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94	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	<p>4.2 Surface Water: 4.2.2. Impacts, Alternative 1: No Action Alternative (page 23) The Draft EIS claims on page 23, without any citation to evidence or analysis, that "since the additional and projected future growth won't be occurring within the City limits, sprawled development will take place in the areas surrounding the City." While there are some rural lands near Pasco, most of the land adjacent to Pasco and the existing UGA is designated as agricultural lands of long-term commercial significance and are protected from sprawling development.</p> <p>Most of the land in the western UGA expansion is also agricultural lands of long-term commercial significance. The proposed western UGA expansion avoids the Rural lands north of Pasco between North Road 36 and Road 52. It also does not include the Rural land north of the existing UGA along the Columbia River. Given this evidence and the relatively low densities proposed for most of the UGA expansions, it is incorrect to assume, as the Draft EIS apparently does, that Alternative 1 will lead to more sprawl and greater impacts on surface and ground water quality.</p> <p>This sentence must be deleted to comply with SEPA.</p>	<p>See comment response #s 68 and 92 above on ag lands of long-term commercial significance. The densities for the areas in the UGAs and surrounding lands ranges from one DU per 5 acres to one DU for 20 or 40 acres.</p> <p>In Alternative 1, developments have been anticipated in all vacant and under-utilized land at the current zoning densities. If fully buildout, the current UGA does not have adequate land to accommodate projected population. There is a shortage of land to accommodate 18,625 persons in the 20-year timeframe. It is therefore, assumed, that the projected population for Pasco UGA will occur, if not within the City limits, it is most likely to occur in the nearby rural areas where land is available and land that are not Ag land of long-term commercial significance.</p>
95	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	<p>4.2 Surface Water: 4.2.3. Mitigation Measures (page 24) and Summary of Impacts by Alternative 4.2.2. Surface Water (page 59) Compact UGAs also help conserve water long-term. Large lots and low densities increase water demand, increase leakage from water systems, and increase costs to water system customers.3 So accommodating the same</p>	<p>Alternative 3 will help conserve water long-term. See above for discussion of ag lands in comment # 68.</p> <p>The City requires specific design standards, such as landscaping, trees etc in the areas identified in PMC 25.180.060. Amendments to the design standards can be revisited through the</p>

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					<p>population in a right-sized UGA can reduce future water demands and costs. One of the mitigation measures for water quantity should be a smaller UGA expansion that conserves agricultural lands of long-term commercial significance. Additional mitigation measures that should be included in the EIS include:</p> <ul style="list-style-type: none"> • Requiring street trees between streets and sidewalks. This will both reduce storm water runoff and making walking more inviting by helping to shade sidewalks and give a sense of protection from cars to pedestrians. Street trees can also help moderate temperatures. • Assessing storm water fees based in part on impervious surfaces. The current storm water fees only consider impervious surfaces for uses other than single-family dwellings. This tends to encourage single-family homes to have large areas of impervious surfaces, increasing storm water runoff and water pollution. 	<p>implementation of the Comprehensive Plans Goals and Policies. Specifically, adjacent to transit corridors, parks and public facilities and other areas where pedestrian movements may occur. The City requires specific features as part of the Stormwater System Plan for every development. These are indicated in the City Design and Construction Standards and Specifications.</p> <p>Stormwater Utility Fees are identified in PMC 3.35.200 and were last updated in 2017 via Ordinance #4369 after completion of a rate study to determine the impacts of needed improvements and system expansion for regulatory compliance and service to customers, including stormwater and irrigation.</p>
96	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	<p>4.3. Plants and Animals: 4.3.1. Affected Environment (pages 25 -27) and Summary of Impacts by Alternative 4.2.3. Plants and Animals (page 60)</p> <p>Futurewise appreciates that the Draft EIS includes information on priority habitats and species identified the Washington State Department of Fish and Wildlife (WSFW). This is helpful to decision makers and the public. Page 25 includes the following statement "WDFW designation of priority habitat types is advisory only and carries no legal protection; although, such designation may increase the significance of impacts as evaluated through the National Environmental Policy Act (NEPA) and the SEPA process." While the Washington State</p>	Update as suggested

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					Department of Fish and Wildlife does not have the authority to regulate most of the upland habitats identified by the priority habitats and species program, counties and cities are required to designate and conserve priority species and habitats through their GMA critical areas regulations. Does have regulatory authority over projects within the wetted perimeter of rivers, streams, and lakes. We recommend that sentences to that effect be included in the Final EIS.	
97	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	<p>The proposed UGA expansions are inconsistent with the Southern Resident Orca Task Force recommendations and the EIS needs to disclose this impact. Further, a potential mitigating measure should be reducing or eliminating the UGA expansions.</p> <p>The EIS should also analyze excluding Priority Habitats and Species including Washington State Department of Fish and Wildlife identified sandy shrub steppe habitats and potential breeding sites for burrowing owls from the UGA expansions. This will better conserve wildlife habitats, as the GMA requires.</p> <p>The Draft EIS on page 27 lists Townsend's Ground Squirrel as one of the species listed as threatened or candidate species associated with shrub steppe habitat. While this is true generally, Townsend's Ground Squirrel is not known to be found in Franklin County. We recommend instead that the Washington Ground Squirrel, which is found in Franklin County, be substituted:°</p>	<p>Alternative 3 will result in reduced UGA boundary compared to Alternative 2, and increased development densities, in comparison to Alternative 2. Additionally, Alternative 3 provides open space and park area near the Broadmoor location in the City.</p> <p>Site specific critical areas evaluations will occur at the time of development for specific proposals and at this time, more detailed critical areas reviews and site investigations will occur, and through this process the City will protect applicable critical areas, including fish and wildlife habitat conservation areas, verified to be present.</p> <p>Updated the name of Ground Squirrel as suggested.</p>
98	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	Futurewise supports adopting and implementing low-impact development (LID) requirements and retaining native plants and native soils which the	Section 4.3.3 includes LID and native landscaping as mitigation actions. Additionally, landowners can

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					<p>Draft EIS identifies as mitigating measures the City may implement. LID and retaining native plants and native soils can protect fish and wildlife habitat and water quality. We also support including the Broadmoor area as a wildlife area and corridor because this area includes significant areas of shrub-steppe habitat.</p> <p>In addition to the proposed mitigation measures which Futurewise supports, we recommend that the city consider requiring landscaping with native plants to provide vegetation of habitat significance in streetscapes, buffers for stormwater swales, rain gardens, and other habitat features.</p>	<p>work on a voluntary basis with Franklin Conservation District to provide native landscaping</p> <p>Alternative 3 provides open space and park area near the Broadmoor location in the City that would preserve shrub steppe habitat.</p>
99	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	<p>4.4. Land Use (pages 30 - 34) and Summary of Impacts by</p> <p>Alternative 4.2.4. Land Use (page 61): Two letters commenting on the scope of the EIS recommended that the EIS examine impacts on agricultural land. Franklin County designates most of the land in the proposed UGA expansion as agricultural lands of long-term commercial significance. This was not disclosed in the Draft EIS. The Draft EIS also does not disclose that the agricultural lands of long-term commercial significance will be converted to urban uses by Alternatives 2 and 3. No mitigation is proposed for these undisclosed adverse impacts.</p>	Additional characterization of agricultural lands will be included in the final EIS. See response to comment #s 68 and 92 above for discussion on agricultural lands of long-term commercial significance and prescribed mitigation measures.
100	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	<p>The GMA prohibits including agricultural lands of long-term commercial significance within an UGA unless there is a purchase or transfer or development rights program adopted and implemented for those lands and they are protected as agricultural lands of long-term commercial significance. This inconsistency with the GMA was</p>	See response to comment response #68 above for discussion on agricultural lands of long-term commercial significance

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					not disclosed in the Draft EIS. The Draft EIS does not document that the agricultural lands of long-term commercial significance no longer meet the Franklin County or GMA criteria for such designations.	
101	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	In addition to these undisclosed impacts, the Draft EIS does not disclose the impacts of allowing residential uses so close to the Tri-Cities Airport on airport operations, the impacts of the limited airport expansion opportunities created by the UGA expansion, and the impacts of airport operations on residential uses in the vicinity of the airport. The adequacy of an EIS "is assessed under the 'rule of reason' ... which requires a reasonably thorough discussion of the significant aspects of the probable environmental consequences of the agency's decision." The failure to even mention these significant adverse impacts on agricultural lands of long-term commercial significance means that the Draft EIS is not adequate. It is the same with the impacts on the airport and the impacts of locating housing so close to the airport.	See Comment #63
102	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	4.5. Environmental Health: 4.5.1: Affected Environment (page 35) The U.S. Environmental Protection Agency's Environmental Justice Screening and Mapping Tool documents that many areas of Pasco are in proximity to Risk Management Plan (RMP) facilities. These are facilities that have potential chemical accident management plans and are within five kilometers (km) (or nearest one beyond 5 km) each divided by distance in km. This map is calculated from the U.S. Environmental Protection Agency's RMP database. The UGA expansion areas are within the 90 to 95 percentiles for Washington State.	Update discussion in Section 4.5.1, Environmental Health, to include additional information drawn from the EPA EJ screening and mapping tool. Note baseline conditions within the existing City limits and also the UGA expansion areas. Mitigation measures will be reviewed in Section 4.5.3 and updated as appropriate. Air quality information from the EJ screening tool will also be added to a new air quality section in the final EIS, that will be located after Section 4.5, Environmental Health. [It should be noted that the Alternative 2 UGA area has lower relative risk for Particulate Matter (PM) 2.5, Ozone, Diesel PM and Risk Management Plan

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					Parts of Pasco and all of the UGA expansion areas also have a higher proximity to hazardous waste than other parts of Washington State We recommend that the EIS disclose these potential adverse impacts and identify potential mitigating measures. Given this and other issues with the UGA expansions planned for residential and commercial uses, one mitigating measure should be not including the area proposed for residential and commercial development within the UGA.	<p>(RMP) Facilities as it would locate future growth in the City farther to the north compared to Alternative 3. Alternative 3 also encourages growth in relatively higher risk areas compared to the UGA for these factors with the proposed in-filling, as the higher urbanized areas show slightly higher values, noting these values would likely adjust during plan implementation as additional development occurred within either of the UGA areas. The only risk factor that increases within the UGA areas is Hazardous Waste Facility proximity, noting it is still below the 50th percentile compared to the rest of the state average.]</p> <p>The expansion of the Urban Growth Area towards the North helps to mitigate existing Environmental Justice challenges due to the increasing risk within Central Pasco per the United States Department of Housing & Urban Developments Environmental Health Index. The areas north of the existing City Limits / UGA rank 80 – 100 while Central Pasco ranks 20-40. The higher the index value, the less exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group.</p>
103	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	4.7. Population, Housing, and Employment: 4.7.2. Impacts (page 39) and Summary of Impacts by Alternative 4.2.6. Population, Housing and Employment (page 63) Futurewise’s scoping comment letter recommended that the EIS should analyze impacts on affordable housing. Housing is an element of the environment. There is a significant need for more affordable housing in Pasco. A quarter of the homeowners with	<p>City is currently evaluating potential impacts to increased density and permitted housing through House Bill 1923 code amendments</p> <ul style="list-style-type: none"> The Land Capacity Analysis indicated that approximately 9,581 dwelling units will be accommodated within existing zoning/development standards. Staff will evaluate added dwelling potential with HB 1923 amendments however until a market

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					<p>mortgages are paying 30 percent or more of their incomes for housing, the standard for cost overburdened housing. For renter-occupied housing units, 41.2 percent are paying 30 percent or more of their incomes for housing.</p> <p>Overcrowding is related to housing affordability. Of the occupied housing units, 8.4 percent have 1.01 to 1.50 occupants per room. Nearly four percent of the occupied housing units (3.9 percent) have 1.51 or more occupants per room. There are early innrcations that overcrowding increases the risk of acquiring infectious diseases including Covid-19. Providing more opportunities for affordable housing by zoning for more affordable densities can reduce overcrowding.</p> <p>Different alternatives may have rnnferent impacts on the affordable housing. However the Draft EIS does not analyze displacement impacts or whether each of the alternatives allow densities that would allow the construction of housing affordable to all income groups. This analysis is still needed.</p> <p>The City of Pasco is considering the adoption of legislation to allow more "Missing Middle" housing in the City which Futurewise strongly supports. We recommend that the EIS include an estimate of the increased housing capacity this legislation will create and an analysis of the potential impacts of the legislation.</p>	<p>analysis is conducted true potential will be difficult to calculate and depend upon.</p> <ul style="list-style-type: none"> • Approval of each or all of the proposed code amendments (Accessory Dwelling Units, Missing Middle and Lot Size Averaging) would permit increased densities and housing units in all residential zoning districts raising capacities by right • Land use in Alternative 3 includes varied densities, thereby allowing different housing types. Final EIS will add further discussion on densities and different housing types. • Increased housing capacity based on new regulations will be performed and added in FEIS
104	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	<p>4.8. Parks and Recreation: 4.8.3. Mitigation Measures (pages 42 - 43)</p> <p>Figure 4-5, Proposed and Existing Parks, Schools and Open Space on page 43, includes the note "Urban</p>	<p>The City's development regulations currently includes park impact fee, park land dedication and/or in lieu park fee. Final EIS will add these in the mitigation measures.</p>

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					<p>Growth Area: Park/Open Space Area build as area develops." It is unclear if this is a mitigation measure or something else. We recommend that the mitigation measures include a requirement that developers dedicate and construct neighborhood serving parks as development occurs. Where a park will serve more than one development, latecomer agreements could be used to share the costs with the other developments.</p> <p>In addition, Figure 4-4 shows significant areas of the City that lack a neighborhood serving park or a school that can also function as a neighborhood park within a 15-minute walk of all homes. Figure 4-5 shows that this need will not be met in all areas of the City. We recommend as a mitigating measure that the parks and recreation plan should identify neighborhood park opportunities and funding to provide neighborhood parks within a 15-minute walk in all neighborhoods.</p>	<p>The Trust for Public Lands Park Score indicates that 67% of Pasco residents live within a 10-minute walk of a park. 68% of residents aged 0-19, 67% of those aged 20-64 and 63% of those 65+ of age are within 10-minute walking distance of a park in Pasco.</p> <p>In reference to Fig 4-4, much of the northeast southeast parts of the City consist of industrial and port lands, therefore, no neighborhood parks would be appropriate there.</p>
105	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	<p>4. 9. Transportation (pages 44 - 48) and Summary of Impacts by Alternative 4.2.8. Transportation (page 64)We appreciate that the EIS, Volume 2 of the comprehensive plan, and the map folio have analyzed traffic impacts including traffic impacts on state highways. We appreciate the planned transportation projects. We also applaud and support the City's complete streets policy.</p> <p>However, the comprehensive plan and the UGA expansions have the potential to increase vehicle miles traveled and to increase traffic hazards. It does not appear that vehicle miles traveled and increased traffic hazards were analyzed and measures to reduce them were considered.</p>	<p>The combination of revised land-use for the expanded UGA and Broadmoor result in a total overall decrease in vehicle miles and hours travelled (VMT/VHT) than the existing Comprehensive Plan (and No-Action) land-uses call for. Projects addressing the Broadmoor Masterplan are incorporated into the updated Transportation Element of the Comprehensive Plan.</p> <p>See Comment #63 for Airport Discussions</p>

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					<p>The UGA expansions and planned residential uses close to the airport will adversely impact the operations and expansion potential of the Tri-Cities Airport, an important regional transportation and economic development asset. While the Draft EIS points to policy LU-2-E which discourages the siting of incompatible uses adjacent to the Pasco airport, the location of Low Density Residential and Medium Density Residential comprehensive plan designations adjacent to and at the northwest end of the runway is inconsistent with this policy.</p> <p>The EIS does not analyze the adverse impacts of these designations on the airport, particularly the residential designations at the north end of the runway that preclude future expansion opportunities.⁵⁸ Nor does it analyze the impacts of the airport on the housing to be built in these areas.⁵⁹</p>	
106	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	<p>The draft EIS mentions recreational and commute bicycling and walking, but not walking and bicycling to access stores and services or the relevance of the placement of commercial zoning to allow for more convenient access by pedestrians and bicyclists. There also does not appear to be plans to address the need for transit, walking, and bicycling within the city and within the urban growth area. Parts of the City of Pasco have a high proportion of households that lack access to private vehicles compared to Washington State as a whole. Public transit is particularly important in those parts of the city but is also beneficial citywide. Walking and bicycling are important citywide.</p>	<p>The Parks, Recreation, and Forestry Plan includes a proposed trail along the FCID irrigation canal right-of-way. For more discussion about this, see Comprehensive Plan transportation inventory, Active Transportation (non-motorized). For improvements, see Deficiencies and Improvement section in Transportation Element.</p> <p>The Pasco City Council adopted the 2011 Bicycle & Pedestrian Plan which was a follow up effort of Resolution 3021.</p> <p>The 2020 Local Road Safety Plan analyzed non-motorized (pedestrian and bicycle) along with vehicle crashes and incidents and indicated a</p>

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					<p>We were unable to find a long-range citywide plan for bicycle facilities, trails, sidewalks, and safe pedestrian crossings of major arterials. The levels of fatal and serious crashes involving pedestrians and bicyclists in parts of the City of Pasco underline the need for such a plan. The Draft EIS also did not analyze the need for these facilities. This analysis should be added to the EIS.</p> <p>The U.S. Environmental Protection Agency's Environmental Justice Screening and Mapping Tool documents that many areas of Pasco suffer traffic proximity compared to other areas of Washington State. Many of these areas are proposed to be designated for residential uses.</p> <p>We recommend that the EIS analyze whether noise walls, tree plantings, or other mitigation measures should be implemented to protect existing and proposed neighborhoods.</p>	<p>preliminary list of proposed projects.</p> <p>The ongoing Transportation System Master Plan will have a focus on non-motorized travel that will refine strategies, issues, constraints and solutions.</p> <p>The US Department of Housing & Urban Developments Environmental Health Index indicates that the City of Pasco has a mean index of 67.55. The higher the score, the less hazard. Areas of the city with the most hazards are Central Pasco (31) and between the Tri-Cities Airport, I-182 and south of Sandifur Parkway (47)</p>
107	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	<p>4.10. Public Services and Utilities (pages 48 - 54 and 4.2. 9. Public Services and Utilities (page 65)</p> <p>Residential growth in the City of Pasco has increased the exposure of residences on the Wildland Urban Interface to wildfires.6-1 Expanding the city onto agricultural and rural lands will increase this exposure.</p> <p>Fire services are an element of the environment. The impacts of the alternatives and UGA expansions on community fire safety must be analyzed in the EIS and mitigation measures identified such as directing growth away from areas with a moderate to high wildfire threat levels. Another potential mitigating measure would be to require new</p>	<p>Comprehensives plan Public Services Element indicates existing and future fire service areas. Also the city is discussing a fire mitigation fee. Information related to wildlife protection and fire risk areas information will be made info available at time of application and on website. Final EIS updated to add these as mitigation measures.</p> <p>City will also follow up with the Fire Districts and Franklin Co Emergency Management to identify risks and include mitigation measures</p>

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					<p>developments to meet Firewise Communities Program standards or the equivalent. Unfortunately, the Draft EIS did not include this analysis and mitigating measures despite the fact that Futurewise's scoping letter included this information.</p> <p>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 2015.⁶⁸ Global warming's drying of wildfire fuels is projected to increasingly promote wildfire potential across the western US. The area of this increase in drying fuels includes the City of Pasco.</p>	
108	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	<p>The Draft EIS noted that "irrigation exists surrounding the City, and this significantly reduces wildfire risk." But this ignores the Franklin County, Washington Community Wildfire Protection Plan which states three times that "[m]any irrigation systems and wells rely on above ground power lines for electricity. These power poles pass through areas of dense wildland fuels that could be destroyed or compromised in the event of a wildfire." One of the purposes of an EIS is to provide accurate information to the public and decisions makers not to shoot from the hip. This statement in the Draft EIS also ignores the fact that the comprehensive plan update proposes to pave over thousands of acres of irrigated farmland and replace them with flammable homes.</p> <p>The Draft EIS states that "the City conducted an</p>	<p>The City of Pasco acquires water rights in several ways to accommodate new developments within the city and within the UGA areas.</p> <ul style="list-style-type: none"> • The first and most preferred way is in accordance with the PMC whereby land owners are required to transfer existing water rights on their properties to the City in a quantity sufficient for the proposed development. This includes water rights for potable and irrigation uses. • The second way, also in accordance with the PMC, is for the property owner/developer to pay a fee 'in-lieu' of transferring existing water rights. This fee is a pre-determined amount based on the current market price per acre-foot of water sufficient for the proposed development. Funds collected from the 'in-lieu' fee are used to purchase additional water

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					Expanded UGA Infrastructure Evaluation, which evaluated the impact of the anticipated growth, UGA expansion, and land use changes. As a result, in order to accommodate future growth, the City will need to make additional improvements to the West Pasco WTP, Zone 3 Reservoir, and acquire additional water rights to meet the 2038 demands." But the Draft EIS does not indicate whether it is possible to acquire the water rights or whether the water rights will be acquired at the expense irrigated farms. This requires further analysis and disclosure.	<p>rights from other sources.</p> <ul style="list-style-type: none"> • The City also acquires water rights from other city, county, state and federal agencies as they may become available. For example, Pasco recently acquired a block of 5,000 acre-feet of water from the Department of Ecology related to water releases from Lake Roosevelt into the Columbia River. Pasco is also in the process of acquiring a second block of 5,000 acre-feet of water right from Ecology from Lake Roosevelt. • The City is also in the process of purchasing 320 acre-feet of unused water rights from the Burbank Irrigation District. <p>The City is exploring options to acquire water from local Irrigation Districts that will supplement the City's irrigation system and allow for expansion. An example of this is recent coordination with the South Columbia Basin Irrigation District and the U.S. Bureau of Reclamation on a request to acquire 2,500 acre-feet of water from their irrigation system via an M&I contract.</p> <p>The Expanded UGA Infrastructure Evaluation referenced in the EIS took all the above information into consideration and determined there are/will be sufficient water rights available to support growth in the proposed UGA</p>
109	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	4.11. Heritage Conservation (pages 54 - 57) and Summary of Impacts by Alternative 4.2.10. Heritage Conservation (page 66) We appreciate this section of the Draft EIS and particularly appreciate the disclosure that construction allowed under the alternatives could potentially impact cultural resources including recorded and unrecorded	City works closely with DAHP. The City uses SEPA to require survey if risk area is identified. If development is located in a lower risk area, then the City uses an inadvertent discovery protocol, where work is stopped if a resource is encountered, and then a work plan is followed to protect the resources in coordination with DAHP

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					<p>archaeological sites.</p> <p>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. The predictive model shows that the City of Pasco and the UGA expansion areas have a "high risk" and "very high risk" of cultural resources.</p> <p>The Draft EIS should include as a mitigating measure adopting regulations that require consultation with Native American Tribes and Nations and site investigations by archaeological professionals before allowing ground disturbing activities in the city and UGA.</p>	<p>and other agencies, including tribes.</p> <p>City will evaluate additional clarifications to requirements in PMC 23.35</p>
110	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	<p>The EIS should analyze the impacts on air quality and greenhouse gas emissions: Futurewise's scoping comment letter requested that the EIS analyze impacts on air quality and greenhouse gas pollution. Air quality is an element of the environment.⁷⁷ 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 Clean Air Agency, the Tri-Cities Ozone Precursor Study (T-COPS). The study found that elevated ozone levels are not caused by one source and that</p>	<p>An air quality qualitative analysis to include greenhouse gas emissions will be included in the final EIS</p> <p>City of Pasco Resolution 3853 adopted Greenhouse Gas Reduction Policy (2018)</p> <p>City of Pasco is a participating member of the Benton-Franklin Council of Governments (BFCG). BFCG is leading Ozone related transportation discussions in Benton and Franklin Counties.</p>

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					<p>traffic emissions are a major source of air pollutants in the Tri-Cities.</p> <p>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 UGA will increase vehicle miles travelled and emissions. These are all probable adverse impacts on elements of the environment and should have been but were not analyzed in the EIS.</p>	
111	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	<p>Climate is also an element of the environment. 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 reduce greenhouse gas pollution and vehicle miles traveled. Almost half of all greenhouse gas emissions in our state result from the transportation sector.</p> <p>Land use and transportation strategies that promote compact and mixed-use development and infill reduce the need to drive and greenhouse gas emissions. Expanding the UGA will increase vehicle miles travelled and emissions. These are all probable adverse impacts on climate, an element of the environment, and should have been analyzed in the Draft EIS, but were not.</p>	<p>See response to comment #110</p> <p>The expansion of the Urban Growth Area, Draft Future Land Use of the Comprehensive Plan along with ongoing and planned code amendments are intended to reduce single occupant vehicle reliance. The addition of increased residential and commercial activity centers, densities accompanied with an efficient transportation “grid” pattern are aimed at reducing vehicle dependency and increasing travel options for non-motorized users.</p>
112	Futurewise	6/15/2020	DEIS	Exhibit #D - DEIS	<p>SEPA EISs are required to analyze greenhouse gas pollution. As the Shorelines Hearings Board concluded, "because it failed to fully analyze the impacts of greenhouse gas emissions from the Project and to consider whether additional</p>	<p>See response to comment #110</p>

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					mitigation is required, the Final EIS is remanded to Cowlitz County and the Port for further SEPA analysis consistent with this opinion.	
113	Washington State Department of Commerce	06/15/2020	DEIS	Exhibit #G - DEIS	Development Phasing and Growth Monitoring - We are pleased to hear that the Community and Economic Development Department recognizes that additional work is critical in upcoming years to implement the Comprehensive Plan and to ensure development occurs as envisioned. This work requires close collaboration and partnership with Franklin County. It also requires a divergence from past practices, but one that is critical for the long-term fiscal sustainability of Franklin County and the Pasco community. There is a trend in the unincorporated Pasco UGA of allowing large-lot development on septic systems. These development patterns create long-term financial liabilities for the City and County, and undermine GMA requirements.	<ul style="list-style-type: none"> City will coordinate discussion and implementation of phasing for the expanded Urban Growth Area with the Washington State Department of Commerce and Franklin County Added language will be included in the Implementation Chapter of the Comprehensive Plan
114	Washington State Department of Commerce	06/15/2020	DEIS	Exhibit #G - DEIS	<p>As the City and County move forward with the UGA review and adoption, our core recommendation is to commit to adopting policies, agreements, and regulations on how development occurs in the unincorporated UGA. Development phasing is a critical tool to prevent a pattern of sprawling low-density development from occurring or vesting in areas prior to the ability to support urban densities.</p> <p>Development phasing can also lower or delay the need for new infrastructure, allour administrative rule, WAC 365-196-330, provides guidance on phasing development in the unincorporated UGA. We understand that the County needs to take a lead role in addressing this problem, and we are</p>	See response to Comment #113

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					committed to partnering with you as you continue working to ensure that development actually occurs as envisioned in the Draft EIS and Comprehensive Plan.	
115	Washington State Department of Commerce	06/15/2020	DEIS	Exhibit #G - DEIS	<p>In addition to development phasing, we also recommend a growth monitoring program so that the City and County have a clear picture of where growth is occurring and whether you are achieving your assumed densities. Changes to Pasco's development regulations through our HB 1923 housing grant should allow more density and housing options over the next twenty years. With development phasing and new development regulations, the City may be able to provide necessary housing for its projected growth that limits the need to commit to the capital facilities and services at the periphery of the proposed UGA.</p> <p>We recommend that you include development phasing, growth monitoring, and code amendments (associated with the HB 1923 grant) as implementation strategies in the Final EIS and your Comprehensive Plan.</p>	<ul style="list-style-type: none"> • Growth Monitoring Program will be added to the Implementation of the Comprehensive Plan • Added to the PMC
116	Washington State Department of Commerce	06/15/2020	DEIS	Exhibit #G - DEIS	After discussions with City staff, we do not have specific concerns about the proposed UGA expansion to the existing industrial LAMIRD. The LAMIRD was considered as part of the existing land base available for development in Kennewick's Industrial Zoned Land Assessment. As the City moves forward with the adoption process, we strongly encourage you to work with the Port of Pasco to develop an overlay zone or regulatory protections to preserve large, contiguous parcels in the proposed expansion area.	<ul style="list-style-type: none"> • Noted • City staff will begin evaluation of existing heavy commercial and all industrial land use and zoning categories • City will conduct analysis and comparison of current city site requirement and improvement standards for commercial and industrial lands to ensure appropriate development of sites

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					The City should also use the periodic update process to review the development regulations in your industrial zones to ensure that you are not allowing uses that undermine industrial development. The City must also continue to work with WSDOT to improve transportation access and local connections to the subject area.	
117	Washington State Department of Commerce	06/15/2020	DEIS	Exhibit #G - DEIS	<p>Tri-Cities Regional Airport</p> <p>One fundamental concern we have with the proposed alternatives are the likely impacts on the Tri-Cities Regional Airport. According to the Washington State Department of Transportation, (WSDOT), the number of enplanements has increased by nearly 100,000 over the last five years. The limited airspace in Eastern Washington is under increasing demand. It is critical that Franklin County and Pasco support land use decisions that allow the airport to operate as an essential public facility.</p> <p>We expressed concerns about this issue in 2015 and 2017 in regards to smaller UGA expansions proposed directly adjacent to the Airport. In 2015, the Board of County Commissioners denied the proposal and said, "there is not merit and value in the proposal for the community as a whole" which is an appropriate response considering the importance this airport has for the region's economic future.</p> <p>We provided specific recommendations regarding this issue in our comments on the EIS scope. The City's EIS states, "Under all alternatives, rail and airport use could also increase. In general, as employment and population increase, the use of these facilities also increases ... Airport activity</p>	See response to comment #63

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					<p>would also increase as recreational activities and employment increases." There appears to be a significant gap in the analysis in the draft EIS regarding impacts to the Airport, and we encourage you to remedy that gap in the Final EIS.</p> <p>The mandatory formal consultation with airport owners, managers, private airport operators, general aviation pilots, ports, and the Aviation Division of WSDOT should provide supplemental information regarding potential impacts on the Airport.</p> <p>Currently, the City and County have a variety of choices in how you will accommodate future growth. We strongly encourage you to choose an option that will not undermine the long-term economic growth for the region, while simultaneously creating public health concerns for future community members.</p> <p>The City could meet its growth allocation without expanding the UGA in a manner that precludes a future runway expansion by increasing densities elsewhere in the proposed expansion area, or changing some of the commercial land use designations to mixed-use designations.</p>	
118	Washington State Department of Commerce	06/15/2020	DEIS	Exhibit #G - DEIS	<p>After reviewing some of the public comments and testimony at the Planning Commission hearing on May 20, 2020, we understand that elected and appointed officials are grappling with challenging decisions about whose property should be included in the Pasco UGA.</p> <p>The City of Pasco has clearly met GMA public participation requirements by adopting a Public</p>	Noted

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					<p>Participation Plan in accordance with our agency's recommendations, holding numerous public meetings and workshops on the periodic update, and disseminating notice through the paper of record and online communications.</p> <p>As appointed and elected officials consider the proposed alternatives, we encourage Franklin County and the City of Pasco to recognize that decisions about where and how growth occur should be based on the overriding public interest. The compact growth alternative appears to best meet that standard.</p>	
119	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Page A: Where “Required permits and approvals” are listed, the text should be updated to note that any approval of the Urban Growth Area expansion would be granted by the Franklin County Board of County Commissioners. Also, discuss any review of your transportation element that would be conducted by the Benton-Franklin Council of Governments, such as certification.	Update as suggested
120	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Page b: It appears that The City of Pasco Urban Growth Area Expansion Capital Facilities Analysis (May 21, 2020) and its appendix Expanded UGA Infrastructure Evaluation by Murray Smith and Associates (November 18, 2019) should be added as "Related Plans and Documents."	Update as suggested
121	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Section 1.1 Introduction: The periodic update was due to be completed by June 30, 2018 (not 2019).	Update as suggested
122	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Table 1: It appears that the population in Franklin County, 10 Year increase should list 28,251 (not 30,493); it looks as though there was a computational error. (Also see Table LU-4 in the	Noted, correct as applicable

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					draft Comprehensive Plan update which shows the same figures). Next, where it says "Residential units needed in Pasco in 10 years, ... 20 years" the label should instead say "Additional Residential units needed in Pasco in "; it would also be a good idea to put the topic in a different column, as the column is labeled "Population" in the heading.	
123	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Table 2: Add the sum of residential units (9,580) for existing capacity. Also, the related text does not describe where Broadmoor is or provide a map; which would help readers unfamiliar with the area. In addition, Table 2 does not seem to correspond with later discussion of the Broadmoor area, that describes different density scenarios between Alternative 2 and Alternative 3. Which alternative does the table reference, and should the table be expanded to list capacity at Broadmoor under both Alternatives?	Add Broadmoor boundary in the map
124	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Chapter 2 Alternatives: Alternatives 2 and 3 both involve adding industrial lands into the City's UGA. It would be helpful to emphasize that the land being brought inside the UGA is already classified as industrial by Franklin County(as a Limited Area of More Intensive Rural Development or "LAMIRD"). There is no net increase in the amount of land designated for industrial purposes, rather it is a jurisdictional change. Switching the land from industrial in the county to industrial in the city makes sense so that urban-level services can be provided.	Update as suggested
125	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Table 3: The information in the table does not correspond with the referenced figure (for example, there are no airport reserve lands or DNR reserve lands on the map).	Update as suggested
126	Franklin County	6/15/2020	DEIS	Exhibit #I	Tables 4 and 5: These tables should be better	Final EIS will add further clarifications

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	– Planning & Building Department				<p>labeled to detail that they are referencing increased UGA totals. For Table 4, why not include a full table that shows the changes in land uses from Alternative 1 to Alternative 2?</p> <p>Comparing Alternative 1 to Alternative 2 does not only involve additional land in the UGA, but it also involves the re-designation of some land within existing city limits and UGA. Additionally, it is unclear how land uses in the Broadmoor area differ between Alternative 2 and Alternative 3. (Table 5 and Table 6 both show sufficient detail for Alternative 3).</p>	
127	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	<p>Section 3.1.1 Increased Density and Development: The first sentence says "Densities will be increased under the preferred alternatives" yet there is only one stated "preferred alternative" -Alternative 3. This should be corrected.</p> <p>Next, the text includes a reference to the Riverview area, and is the first mention of Riverview. We suggest defining the area, showing it on a map, or including a footnote with a description. Additionally, a reference is made to City of Pasco Ordinance 4221. Since the time period under which the Ordinance take effect has lapsed it is not clear how this is important. Did/ will the city extend the time period?</p> <p>If the Ordinance no longer applies it may be best to exclude the reference and related discussion from the EIS.</p>	Final EIS will add further clarifications
128	Franklin County – Planning & Building	6/15/2020	DEIS	Exhibit #I	Section 3.1.2 Traffic: Are there any figures or forecasts to support the information provided in the section? When "increases" in traffic are discussed,	See response to comment #80

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	Department				what is the magnitude? Consider referencing supporting documents or including data from your studies.	
129	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	<p>Table 7: In the row for "Urban Growth", column for Alternative 1, we suggest changing the statement to say that the alternative would accommodate the least amount of projected growth.</p> <p>In the row for "Transportation," column for Alternative 3, we suggest noting the alternative could result in shorter trips due to more compact development patterns (this could also include mode split shifts-i.e. more kids walking to school).</p> <p>For the row for "Economic Development," column for Alternative 3, consider noting that the alternative results in conversion of less land than Alternative 2 which is currently in agricultural production, which relates to production of commodities, food processing jobs, etc.</p> <p>For the row for "Open Space ... ," column for Alternative 3, consider adding that with a smaller growth area "footprint" there will be less affected fish and wildlife habitat.</p>	Update as suggested
130	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	<p>Figures 4-1, 4-2, and 4-3: Specify that the referenced "proposed UGA" is Alternative 3. None of the maps show the mapped features which are present farther north, and which would be included in the Alternative 2 scenarios. These maps should all be updated in order for Alternative 2 to be fully presented/ examined in the document</p>	Update as suggested

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131	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Table 8: There is a reference to one mine site and a reference to "both" which is confusing. Verify the correct number of mine sites. It would be helpful to show the mine(s) on a map or at least, describe the general location. In Vol. II of the draft Comprehensive Plan update, two mineral resource sites are referenced.	Update table as suggested. Clarify map CA-1
132	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	4.1 Earth Figure 4-1: Consider showing and labeling the location of the liquefaction susceptibility zone as referenced in Table 8. (Perhaps consider cross-referencing to the draft Comprehensive Plan map folio.) Section 4.1.2 Impacts: The Alternative 3 discussion says that Broadmoor will be developed with more density in Alternative 3 than Alternative 2, but there is little detail or information on that. It would be helpful if more information was provided.	<ul style="list-style-type: none"> • Cross reference to Comprehensive Plan mapfolio map CA-1 • Add discussion about the total number of units anticipated in Broadmoor in Alternative 3
133	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Section 4.2 Surface Water: Consider re-naming the section "Surface and Ground Water."	Update as suggested
134	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Section 4.2.1 Affected Environment: We suggest changing the description that currently states the Columbia River is to the south of the City, to instead describe that the river lies to the west and south of the City.	Update as suggested
135	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Section 4.2.1 Affected Environment: The final paragraph discusses City of Pasco Water Rights. It is unclear in the document if the City has sufficient water rights to accommodate the considered alternatives. Please indicate if this is an issue or not (or reference supporting documents). Mitigation measures should be listed, if relevant.	See Comment #108
136	Franklin County	6/15/2020	DEIS	Exhibit #I	Section 4.2.2 Impacts: We recommend adding an	Update as suggested

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	– Planning & Building Department				observation that expansion of the city's UGA and subsequent annexation and extension of sewer can limit the trend of homes that are built with septic systems, which can benefit groundwater and lessen impacts on it We also noticed that "Alberti et. al." is referenced, but the reference does not appear in the bibliography. There may be other instances where references are not included in the bibliography.	
137	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Section 4.2.3 Mitigation Measures: We recommend adding a mitigation measure about low-impact development (LID), which appears later in the document (section 4.3.3), to this section on stormwater. It would be appropriate to discuss LID in the stormwater mitigation section.	Update as suggested
138	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Section 4.3 Plants and Animals: We noticed there is no reference to bird migration routes.	This information will be added
139	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Section 4.3.2 Impacts: First, this section could be improved by mentioning that development can cause displacement of habitat. Next, under the "Alternative 1: No Action Alternative" subsection, there is a statement that reads "the least amount of development would occur as it [the alternative] has the least projected population growth." This is not a true statement; the population growth projection does not change between the scenarios, only the amount of development to accommodate such growth does.	Update to make more accurate
140	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Section 4.4.1 Affected Environment: We recommend broadening this section to answer the SEPA checklist question "Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land	Update as suggested

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					<p>of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?</p> <p>Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting?" Please discuss compatibility of the new development under the proposed alternatives with existing farming practices in the area.</p>	
141	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #1	Table 9: The table shows existing land use designations, and not necessarily existing uses as developed (if that were truly the case, you would have a vacant land category, among others). We suggest re-naming the table for better understanding. Also, airport reserve lands and DNR Reserve lands are going to be newly introduced in the comprehensive plan update, and therefore appear out of place here for a discussion of "existing land uses." Likewise, Table 10 should also be re-titled.	Update the title to add Existing Comprehensive Plan land use. Also change DNR and Airport reserves in all relevant tables (e.g. Table 3) based on the decision on those land uses
142	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #1	Section 4.4.1 Affected Environment: The text included after Table 9 should be corrected to discuss the U.S. Army Corps of Engineers (not Corp). Also, it appears that there should be more discussion / mention of DNR land holdings in this section.	Update as suggested
143	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #1	Section 4.4.1 Affected Environment: At the top of page 3 2 there is a list of Comprehensive Plan designations. Please specify that this list is from the draft updated comprehensive plan, and not from the current plan.	Update as suggested
144	Franklin County	6/15/2020	DEIS	Exhibit #1	Section 4.4.2 Impacts: Discuss existing airport and	Update as suggested, also update in the Comp Plan

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	– Planning & Building Department				land use compatibility issues, and how the Comprehensive Plan addresses them.	under Land Use Areas and Compatibility
145	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	<p>Section 4.4.3 Mitigation Measures: The last two paragraphs at the end of the section are unclear. In addition, include a mention of the new aviation easement(s) that will be in place near the airport.</p> <p>The section should also discuss existing zoning code provisions (for both Franklin County and the City of Pasco) for the Airport Overlay District -which provides for safety compatibility zones, use restrictions, and height limitations -as mitigation measures to address development proximate to the Tri-Cities Airport.</p>	<p>These paragraphs are discussing development regulations as added mitigation measures.</p> <p>Airport navigation - update as suggested</p>
146	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Section 4.5.1 Affected Environment: Change the last paragraph to "During construction and operation of some industrial developments	Update as suggested
147	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Section 4.5.2 Impacts: Consider adding some language referencing that open burning is not allowed within the UGA -expanding the UGA will limit the ability for existing and future residents in the subject area from being able to burn, which may lead to air quality enhancements.	Update as suggested
148	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Section 4.5.3 Mitigation Measures: ED-1-C Policy does not appear to really fit in with the section's subject.	Replace ED-1-C with ED-2 GOAL
149	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Section 4.6.2 Impacts: Shoreline uses are already regulated by the County, and shoreline functions are protected through mitigation to ensure a no net loss standard. If the UGA is	Noted

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					expanded north (and specify the linear miles) and the land is annexed, then regulation of shoreline uses transfers to the City.	
150	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Section 4.6.2 Impacts: It would be helpful if the document would quantify the different linear length of shoreline area included in the different alternatives.	Update as suggested The 2016 Shoreline Master Program indicated that there are 17 miles of river shoreline, which includes the Columbia and Snake Rivers within the Pasco City Limits.
151	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Section 4.7.1 Affected Environment: The figures included in the first paragraph are not consistent with the data shown in Table 1 and Table 2. Table 1 shows that 7,522 additional residential units will be needed in 10 years and 15,217 additional units will be needed in 20 years.	Update the documents
152	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	4.9.3 Mitigation Measures: The draft Comprehensive Plan update document says, "The City of Pasco adopted Ordinance No. 3821 establishing concurrency procedures for transportation facilities in conjunction with new development." Consider adding this measure as a mitigation.	Update as suggested
153	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	4.10.2 Impacts: Will infrastructure projects and improvements result in any business displacement?	<ul style="list-style-type: none"> Business displacement is not expected and will be avoided
154	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	4.10.3 Mitigation Measures: The total cost for capital improvements for 2020-2025 is \$249M (of which \$57M would be spent on Sewer System Improvements and \$48M would be spent on transportation improvements), as identified in Table CF-1 in the draft Comprehensive Plan Vol. 2. It would be prudent to call out the planned investment in Capital Facilities in this section, or elsewhere in the document.	<ul style="list-style-type: none"> Update as suggested Add table CF-1 from Comp Plan to EIS as mitigation measures

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155	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Consider Discussing Impact Fees: While impact fees are not discussed in the EIS document, they are clearly an important part of the scheme for funding improvements related to future growth. For example, City representatives have been very forthright in their support for impact fees to fund schools. Some mention or reference to these mitigation measures should be incorporated into the EIS, unless the City Council intends to discontinue the fees.	<ul style="list-style-type: none"> Update as suggested Impact fees will be added as Mitigation Measures
156	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Document Choices Made when Determining UGA Alternatives: When the City's updated UGA application is provided to the County for processing, it would be very helpful if an explanation or documentation is provided with your submittal, identifying how certain properties were selected (or not selected) to be included in Alternative 3.	<ul style="list-style-type: none"> Noted Additional information to be added
157	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	We are aware that some landowners and other stakeholders have voiced concerns about this issue, and it would be helpful to have a record to refer to regarding these choices, for reference when the UGA application is considered by the County for legislative processing. For example, it would be important for the city staff to provide the rationale used to propose extending its UGA into areas which are currently designated as "Agricultural Lands" in some of the most northerly locations, as opposed to taking in the areas designated as rural (the LAMIRDS).	<ul style="list-style-type: none"> Noted Additional information to be added
158	Franklin County – Planning & Building	6/15/2020	DEIS	Exhibit #I	The Kohler properties (which are included in the County's Columbia River West Area LAMIRD) are excluded from the UGA in Alternative 3, but the City	<ul style="list-style-type: none"> The 2014 Comprehensive Sewer Plan is currently being amended; the amended Sewer Plan does not include this specific property

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	Department				of Pasco 2014 Sewer Comprehensive Plan shows that the city public works department plans to extend sewer infrastructure to these locations by 2026. (We understand that the city's Public Works Department is currently updating the 2014 Comprehensive Sewer Plan with an addendum that incorporates proposed expansion of the Urban Growth Area, however it is unclear if that document should be relied upon for this analysis.) Likewise, the property is proximate to a proposed future lift station and proposed sewer pipes are drawn extending to the property line in Exhibit CF-2 of the draft Comprehensive Plan update map folio.	<ul style="list-style-type: none"> City Planning and Public Works staff has coordinated Comprehensive Plan draft Land Use, UGA and Sewer analysis
159	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Only part of the Thanksgiving Partnership (TLP) property (which is included in the County's East Foster Wells Road Area LAMIRD) is included in the UGA under Alternative 3, but sewer is projected to run up Capitol Ave. to E. Foster Wells Rd. by 2031.	<ul style="list-style-type: none"> Noted City staff discussing options with property owner
160	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Document Choices Made when Determining Future Land Use Designations: When the updated UGA application is provided to the County for processing, it would be very helpful if an explanation or documentation is provided with your submittal. We will be comparing the areas selected for more intensive uses with the existing development patterns of the LAMIRDS.	<ul style="list-style-type: none"> Noted Additional information to be added
161	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	Discuss Annexation Plans and Policies: We recommend adding a discussion to address how City staff foresees annexation would take place. It appears that the documents do not shown any proposed phasing" approach to the UGA expansion; rather, it appears that the UGA expansion would occur at one time. This is unfortunate, particularly since materials	Add phasing discussion

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					presented during the August 15, 2019 Planning Commission workshop included "10 year and 20 year boundaries." Has the City staff changed their approach in this regard?	
162	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	We recommend adding more discussion describing phasing, and how annexation could be used as a tool to prevent land entitlements from being possibly granted before services are in place. Furthermore, if there are other mechanisms that City staff has in mind to phase expansion into the UGA, those should be detailed as well. The Department of Commerce's Urban Growth Area Guidebook (Page 19) could be consulted for suggestions. Absent any mechanisms or stated preference or intentions, the County staff will likely include proposed "future UGA reserve areas" or UGA phasing in their recommendation to the County Planning Commission and County Commissioners for consideration.	Add phasing discussion. Coordinate with County on designating future UGA reserve areas by the County. See response # 113.
163	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	<p>Expand and Clarify the Discussion of the Broadmoor Area: The discussion of the Broadmoor area and the future development is rather limited in some topics, and could be broadened, particularly since the bulk of development to occur within the current city limits will be at Broadmoor.</p> <p>Since mining is occurring on the site, we paid particular attention to the discussion about mining in Vol. II of the draft Comprehensive Plan update, which says on page 138 (emphasis added): Presently, American Rock Products is mining the lands and producing various types of crushed rock. American Rock Products also produces ready mix concrete utilizing gravel the company mines. The</p>	<p>Broadmoor area is discussed under Land Use Areas and Compatibility in the Land Use Element. Add further discussion on Broadmoor area in the FEIS</p> <p>Add clarification on mineral resource lands</p> <p>Add note on annexation requiring Zoning Designations indicated by City/Broadmoor Master Plan</p>

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					<p>crushed rock and sand that are derived from the American Rock pit are used throughout the region in the construction industry. because of the importance of gravel for construction activities and the lack of other known mineable sites, there is a need to protect the lands located in Section 12 [T. 9N R 28E] and Section 7 [T. 9N R 29E] for mineral extraction.</p> <p>With the Pasco UGA population project to increase by about 50,148 over the next 20 years, there will be an ever-increasing need for mineral resources for new infrastructure, and residential, commercial, and industrial development American Rock estimates that there are enough resource materials in these lands that mining could continue for another 20 to 25 years ...The above text appears to conflict with the following statement, on the same page: ... While the lands described above have been designated for mineral extraction, such use designation is considered an overlay use only. Upon completion of the mineral extraction, the intended and ultimate use of the land is as shown on the land use map ...</p> <p>Furthermore, the rock mine location is shown to carry a proposed medium density residential designation. Please provide further discussion on what portions of the Broadmoor area are encumbered by mining verses what areas are going to be developed in the next 20 years.</p> <p>Please elaborate further on what mitigation measures will be needed, or what policies the City Council may put into place to assure compatibility between on-going rock extraction operations and</p>	

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					<p>proposed new development within a close proximity.</p> <p>Additionally, when the City staff provides a formal UGA re-application, it will also be important for the package to include information regarding the phasing or development timeline intended for the Broadmoor area, particularly for annexation. One of the mixed-use, land use classifications in alternative 3 (Mixed Use Neighborhood) is located mostly outside of city limits in the proposed UGA. Table LU-1 in the draft City of Pasco Comprehensive Plan - Vol. II shows that a zoning district known as "MU-N" will be used in the development regulations to implement the Mixed Use Neighborhood designation. The City staff should coordinate with the County staff so it can be determined if a similar zoning district will be needed in the County's zoning code. (See County-Wide Planning Policy Section II, no. 9 and Section VII, no. 28 and 29.)</p>	
164	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #1	<p>6. Identify and Discuss Zoning Code Modifications: It is clear that Pasco's zoning regulations will need to be revised, and several new chapters added for new zoning designations. What will be the process for this work? Is that work already underway? In Sec. 4.4.3 there is a statement that "The City of Pasco Zoning Regulations in PMC Title 25 regulate development in various zoning districts, and a zoning change could be made to further restrict the type and density of development in the planning area." It appears that more attention and discussion should be granted on this topic, within the context of the EIS, to properly identify mitigation measures,</p>	<ul style="list-style-type: none"> • Noted • Additional information to be added in the Implementation Chapter of the Comprehensive plan

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					and measures to address impacts.	
165	Franklin County – Planning & Building Department	6/15/2020	DEIS	Exhibit #I	To summarize, we have found areas where the DEIS should be further revised or amended prior to the issuance of a final EIS, to clarify and document plans, their impacts, and mitigation strategies. We have also identified some areas of concern related to an Urban Growth Area expansion request and have provided some early feedback in anticipation of the application, based on the EIS. As always, we welcome a meeting to coordinate and collaborate on these important issues.	Noted
166	Washington State Department of Transportation	6/15/2020	DEIS	Exhibit #J	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.	<ul style="list-style-type: none"> • RCW 36.70A.110(2) requires each city to designate an urban growth area based on population projected made for each county by the WA Office of Financial Management. • Projected population for the City of Pasco as allocated by Franklin County is 121,828 by the year 2038, an increase of over 45,000 people • Not expanding the UGA would severely limit the location of housing, possible increasing affordable housing challenges and decreasing level of service operations on city facilities and services • Existing V/C Ratio for I-182 shows signs of congestion (0.80 – 0.90) with a V/C above 1.0 on US 395/Blue Bridge. Congestion challenges are also identified in the BFCOG M/RTP • With expected population and employment growth, the City of Pasco is implementing a variety of land use strategies and policies to encourage less car dependent travel including increased densities, additional neighborhood, regional and office space land uses in NW Pasco and the proposed UGA. Additionally, the

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						<p>proposed (ongoing) code amendment address street connectivity will help provide a foundation for a connected transportation network with shorter block lengths that may encourage alternative modes of travel.</p> <ul style="list-style-type: none"> The City of Pasco is in the process of conducting the Transportation System Master Plan which will also address updates to our Transportation Impact Analysis methodology and Transportation Impact/Mitigation Fees for private developments to ensure proper compensation and measures are in place.
167	Washington State Department of Transportation	6/15/2020	DEIS	Exhibit #J	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.	<ul style="list-style-type: none"> Noted, coordination with Franklin County will be necessary for any facilities operating with Pasco City Limits, Urban Growth Area and Franklin County
168	Washington State Department of Transportation	6/15/2020	DEIS	Exhibit #J	<p>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.</p> <p>The Airport Master Plan shows future plans to</p>	<ul style="list-style-type: none"> Noted City ongoing TSMP progress, WSDOT is stakeholder/TAC member

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					<p>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.</p> <p>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.</p>	
169	Washington State Department of Transportation	6/15/2020	DEIS	Exhibit #J	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.	<ul style="list-style-type: none"> • Comment Noted • TSMP underway
170	Washington State	6/15/2020	DEIS	Exhibit #J	The Capital Facilities Plan Analysis includes Synchro modeling results for the year 2024 for Rd 100 and	<ul style="list-style-type: none"> • Noted • City believes we have met the requirement

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	Department of Transportation				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.	and intent of RCW 36.70A.070(6)
171	Washington State Department of Transportation	6/15/2020	DEIS	Exhibit #J	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.	<ul style="list-style-type: none"> Existing V/C Ratio for I-182 shows signs of congestion (0.80 – 0.90) with a V/C above 1.0 on US 395/Blue Bridge. Congestion challenges are also identified in the BFCOG M/RTP City has ongoing code amendment addressing transportation connectivity and accessibility for all modes, including creating walkable and transit accessible / friendly communities
172	Washington State Department of Transportation	6/15/2020	DEIS	Exhibit #J	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.	<ul style="list-style-type: none"> Noted Add language clarifying that WSDOT responsibilities only apply to WSDOT facilities
173	Washington State Department of Transportation	6/15/2020	DEIS	Exhibit #J	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	<ul style="list-style-type: none"> PMC 3.40.100 (I-182 Corridor Traffic Impact Fund) was created to house/collect fees associated with traffic impact (TIFs). https://pasco.municipal.codes/PMC/3.40.100 The Traffic Impact Fee requirements, fees and applicability are being evaluated through the TSMP

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					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.	
174	Washington State Department of Transportation	6/15/2020	Comprehensive Plan Vol 2	Exhibit #J	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.	Add description as suggested
175	Washington State Department of Transportation	6/15/2020	DEIS	Exhibit #J	Please include funding sources for the planned TDM measures.	Refined strategies for TDM including funding sources will be specifically identified in the upcoming Transportation System Master Plan, expected in 2021.
176	Washington State Department of Transportation	6/15/2020	DEIS	Exhibit #J	We understand that you will add a map showing the changes in land use designations in the Land Use Element of the Comprehensive Plan.	Noted
177	Wireman, Ginger	6/10/2020	DEIS	Exhibit #K	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.	<ul style="list-style-type: none"> The City reached out directly to stakeholders and organizations throughout the public review process of the Comprehensive Plan (DEIS) The City also includes numerous media and community orgs/agencies through it normal Public Press Release notifications including the following: <ul style="list-style-type: none"> Bustos Media; Cherry Creek Media; KNDU, KEPR, KVEWTV, La Vox, La Raza del Noreste, Tri-Cities Hispanic Chamber of Commerce, Tu Decides, Univision, Latino Coalition and the Downtown Pasco Development

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						Authority
178	Wireman, Ginger	6/10/2020	DEIS	Exhibit #K	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.	See response to comment #78
179	Wireman, Ginger	6/10/2020	DEIS	Exhibit #K	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.	Noted
180	Wireman, Ginger	6/10/2020	DEIS	Exhibit #K	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.	Water rights existing conditions are covered in Section 4.2.1. Section 4.10.3 includes a mitigation measure to secure additional water rights to meet the future demand. Additionally Section 4.3.3 identifies promoting the preservation of on-site native vegetation, particularly riparian vegetation near surface waters and upland shrub-steppe communities, as a mitigation measure
181	Wireman, Ginger	6/10/2020	DEIS	Exhibit #K	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.	<ul style="list-style-type: none"> Noted City is working through House Bill 1923 amendments in 2020-2021 including an amendment to the existing accessory dwelling unit regulations
182	Wireman, Ginger	6/10/2020	DEIS	Exhibit #K	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	The City recognizes the need to bike facilities improvements. The Complete Streets policies will implement safer bike lanes. Improvements are identified in Volume II

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					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.	
183	Wireman, Ginger	6/10/2020	DEIS	Exhibit #K	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 mesquites. Require a percentage of pervious paving and onsite swales for commercial establishments.	Noted. See response to comment #s 89, 98 and 137 All stormwater is required to be retained on site within the development.
184	Wireman, Ginger	6/10/2020	DEIS	Exhibit #K	Low-impact development should go in 4.2.3.	Update as suggested
185	Wireman, Ginger	6/10/2020	DEIS	Exhibit #K	Concerned that the highest density zoning is only near the railroad and airport. Surely, there can be some denser pockets distributed across the community?	<ul style="list-style-type: none"> The Urban Growth Area has increased medium-density and high-density residential distributed widely through the proposed expansion area. Approximately 15% of the UGA reserved for medium to high density residential The Draft Future Land Use Map indicates increased densities in the expanded Urban Growth Area, Broadmoor, Road 68 and near Osprey Point Ongoing code amendments (House Bill 1923) will increase the minimum densities and

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						building capacity of the Low Density Residential Land Use across the entire city
186	Burns, Max & Diana	07/12/2020	Comprehensive Plan	Exhibit #M	<p>One of our main concerns is the current lack of sidewalks going from Burns Rd and Broadmoore down to Dent and Kohler Roads. As you know two schools are scheduled to open this fall which will result in students walking home after school or even later after sports practices and other after school activities. Many families live in the developments off of both Dent and Kohler Roads but there are no sidewalks for these students to safely walk home.</p> <p>As a former middle school principal my school faced a similar problem as students were often walking in the middle of the road due to the lack of a side walk. I trust the council members have driven around these areas of development and understand our concern. Especially when walking west on Burns from Broadmoore where there is a steep hill and basically no edge to walk safely out of the traffic lanes.</p> <p>Likewise there are no sidewalks on Dent resulting in folks walking in the road. I witness this on many evenings as neighbors are out for an evening walk but must walk in the road due to a lack of sidewalks. Is there a plan to resolve this safety issue?</p>	<ul style="list-style-type: none"> The City previously left sidewalk constructions (and full-street) construction as a developer option in Low-Density Residential areas. In 2019, Ordinance 4454 was adopted by the Pasco City Council requiring sidewalk construction in all/every residential zone The current Transportation Improvement Program has identified a pedestrian connection on Burns Road to assist non-motorized users with accessing the new school sites (funding is pending)
187	Burns, Max & Diana	07/12/2020	Comprehensive Plan	Exhibit #M	<p>We would also like to see more parks and walking trails as the city expands out into the rural areas. We have lived at our current residence for 40 years and as the growth has moved north areas to safely walk and enjoy nature have decreased. There are several areas that are a natural fit for such trails but I assume the city must designate them as such to keep houses from taking over these areas? Will the</p>	<ul style="list-style-type: none"> The Comprehensive Plan includes a Parks and Open Space Element that describes the expected level of service to be maintained to adequately provide service to the growing population Level of Service estimates were identified in the 2016 Parks & Forestry Plan The Administrative and Community Services

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					council be speaking about the number and types of parks to be included in the plan? Whose responsibility is it to see that these plans come to fruition?	Department is responsible for park planning
188	Burns, Max & Diana	07/12/2020	Comprehensive Plan	Exhibit #M	<p>The current plans talks about keeping developments aesthetically pleasing but our concern is that most of the recent developments look like clones of each other due to the large brown brick fences surrounding them.</p> <p>When some of the first developments-Quail Run, Pelican Point-were developed they did not have to put up fences leaving the beauty of open space. Driving north and south on Dent Rd is like driving through a brown brick tunnel.</p> <p>Is the fencing requirement a decision of the property developer or can the council set standards for fencing types or no fencing at all?</p>	<ul style="list-style-type: none"> Landscaping and Screening, including fencing are regulated in PMC 25.180 and are the responsibility of the property developer/owner. Regulations and standards in Title 25 (Zoning) are recommended by the Planning Commission with final decisions made by the Pasco City Council Amendments (changes/revisions) to the municipal code can be initiated by any person, firm, group of individuals or municipal department as indicated in PMC 25.210.020
189	Burns, Max & Diana	07/12/2020	Comprehensive Plan	Exhibit #M	We agree with the idea of walking communities but wonder who will be setting the codes for these communities. Will it be a decision of the property developer, the council or combined decision?	<ul style="list-style-type: none"> Standards and regulations in Title 21 (Subdivision Regulations) and Title 25 (Zoning) are recommended by the Planning Commission and final decisions are made by the Pasco City Council.
190					What is mixed-use property on River Shore Drive and Burns Rd. defined as?	<ul style="list-style-type: none"> The City will create a series of new Mixed-Use Designations through the implementation of the Comprehensive Plan. Mixed-Use-Neighborhood (MU-N) is draft Land Use created out of the Broadmoor Master Planning effort (ongoing). This Land Use is characterized as including a variety of housing types and commercial/office space.
191	Ben Franklin Transit	07/13/2020	DEIS	Exhibit #N	In future comprehensive planning efforts, BFT recommends that two different firms or teams of firms be considered for plan development and	Noted

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					subsequent environmental reviews.	
192	Ben Franklin Transit	07/13/2020	DEIS	Exhibit #N	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.	Noted
193	Ben Franklin Transit	07/13/2020	DEIS	Exhibit #N	<p>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.</p> <p>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.</p> <p>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.</p> <p>The assumption that household size is static over</p>	<ul style="list-style-type: none"> • Noted, the city recognizes that household sizes vary by unit type • Average household size is derived from the existing housing units and existing total population. This gives an average/base number to work with for future need. It is understandable that this numbers can vary and can also change over time.

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					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.	
194	Ben Franklin Transit	07/13/2020	DEIS	Exhibit #N	<p>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.</p> <p>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 Broad moor area is unclear, given the data presented (and still uncertain, given the lack of an approved development plan).</p> <p>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.</p>	<ul style="list-style-type: none"> In addition to the increased density target, the City is working through a major code amendment (CA2019-013) Street Connectivity to ensure that new developments result in smaller, more walkable blocks with connected streets, pathways and corridors within the City limits and in the proposed UGA.
195	Ben Franklin Transit	07/13/2020	DEIS	Exhibit #N	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").	<ul style="list-style-type: none"> Noted. As already mentioned in response #65, Planning Department has numerous code amendments underway and planned to address increased residential densities, creating additional mixed-use areas and corridors to support multi-modal transportation and walkable communities

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					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.	
196	Ben Franklin Transit	07/13/2020	DEIS	Exhibit #N	<p>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 Broad moor 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."</p> <p>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</p>	<ul style="list-style-type: none"> Noted, and may be revised. Character should be replaced with "built environment". This paragraph describes that future development will occur in the proposed UGA and within the City's existing neighborhoods with infill developments to increase densities.

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					<p>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?</p> <p>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.Sdu/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.Sdu/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.</p>	
197	Ben Franklin Transit	07/13/2020	DEIS/Comp Plan	Exhibit #N	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	<ul style="list-style-type: none"> • Clarification added as suggested • The City is in the process of various code amendments intended to increase the

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					<p>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)."</p> <p>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.</p> <p>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</p>	<p>permitted/allowed housing types across every residential parcel and zoning designation. Code Amendments are being conducted as part of the House Bill 1923 Legislation to create and increase residential building capacities. As such, the City is continuing efforts with the Planning Commission to permit duplexes, triplexes, courtyard apartments, accessory dwelling units and utilizing lot size averaging to encourage housing diversity and construction flexibility</p> <ul style="list-style-type: none"> • Table 3 indicates existing land use in the City limits and current UGA. The proposed land uses are shown in Table 4 and Table 5 for Alternatives 2 and 3 respectively.

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					the Comprehensive Plan as written will necessarily enable that to occur.	
198	Ben Franklin Transit	07/13/2020	DEIS	Exhibit #N	<p>Section 3.2, Table 7 states, "Housing meets the 20-year demand with a variety of housing types and residential densities."</p> <p>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.</p>	<ul style="list-style-type: none"> See response #197 above See footnote #1 in Table 5, that the low density residential land includes 40 acres of parks, 160 acres of land for school facilities and additional public lands.
199	Ben Franklin Transit	07/13/2020	DEIS	Exhibit #N	<p>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 ... "</p> <p>The use of "could" in the first sentence appears to be speculative and without basis in analysis.</p> <p>The subsequent use of "would" in the next sentence turns the speculation into a foregone conclusion.</p> <p>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.</p>	<ul style="list-style-type: none"> Noted See Section 4.10 Transportation, Transportation Element in Volume 2, and Appendix A, mapfolio maps T-1 to T-12 for detailed analysis.

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					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.	
200	Ben Franklin Transit	07/13/2020	DEIS	Exhibit #N	<p>Section 3.1.2 states, "the Broad moor area in both alternatives will retain more traffic internally due to the increase of mixed land uses."</p> <p>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.</p> <p>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.</p> <p>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.</p>	<ul style="list-style-type: none"> Noted and text should be amended. The rate of increased congestion in terms of VMT and VHT will be slowed down due to the increased land uses and densities along with associated new street pattern and connectivity requirements with the intent of fostering a more hospitable environment for multi-modal travel
201	Ben Franklin Transit	07/13/2020	DEIS	Exhibit #N	Section 3.1.4 states, "The City's zoning code currently allows mixed uses in certain zones with	<ul style="list-style-type: none"> See response #6 above regarding House Bill 1923 and ongoing Street Connectivity Code

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					<p>Mixed-Residential/Commercial land use. Both alternatives would promote mixed-use developments as future development is anticipated in the Broadmoor area."</p> <p>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 1-182, the Columbia River, and the northern urban growth area boundary.</p> <p>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 Broad moor 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.</p>	<p>Amendments; both will apply across all zoning and new developments in the city</p> <ul style="list-style-type: none"> City is also updating its Traffic Impact Analysis procedures and Traffic Mitigation Fee process to ensure appropriate improvements are included in any/all developments
202	Ben Franklin Transit	07/13/2020	DEIS	Exhibit #N	<p>Section 3.2, Table 7 indicates that "Growth within the UGA, planned areas would reduce sprawl."</p> <p>While the planned action may encourage infill at</p>	Noted.

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					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.	
203	Ben Franklin Transit	07/13/2020	DEIS	Exhibit #N	<p>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."</p> <p>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.</p>	<ul style="list-style-type: none"> See comments response #6 above regarding House Bill 1923 and Street Connectivity Code Amendment; The City Construction and Design Standards would be updates in accordance with the Pasco Municipal Code updates
204	Ben Franklin Transit	07/13/2020	DEIS	Exhibit #N	<p>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."</p> <p>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</p>	<ul style="list-style-type: none"> Noted The City intends to adopt a major revision to the PMC Title 21 that will require smaller block lengths, perimeters with requirements for pedestrian and non-motorized pathways to provide maximum route and travel choices for users

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					density developments will generate more traffic than lower density developments in a geographic area of comparable size.	
205	Ben Franklin Transit	07/13/2020	DEIS	Exhibit #N	<p>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."</p> <p>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.</p>	Noted
206	Ben Franklin Transit	07/13/2020	DEIS	Exhibit #N	<p>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:</p> <ul style="list-style-type: none"> Low Density Residential means 2 to 5 single-family dwelling units per acre (79% of residential land area). <ul style="list-style-type: none"> As previously noted, this represents a significant portion of the City's residential land that remains devoted to very low-density sprawl. 	<ul style="list-style-type: none"> Noted The City plans to develop a coordinated approach to include Ben Franklin Transit, Benton-Franklin Council of Governments and the Washington State Departments of Transportation and Commerce in zoning amendments

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					<ul style="list-style-type: none"> • Medium Density Residential means 6 to 20 dwelling units per acre (17% of residential land area). <ul style="list-style-type: none"> ○ 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) <ul style="list-style-type: none"> ○ 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. <ul style="list-style-type: none"> ○ 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 	

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					<p>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.</p> <ul style="list-style-type: none"> Commercial development densities are not defined. Commercial development densities should use FAR as the common density measure. <p>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.</p>	
207	Ben Franklin Transit	07/13/2020	DEIS	Exhibit #N	<p>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.</p> <p>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</p>	<ul style="list-style-type: none"> Noted The Draft (proposed) future Land Use incorporates higher concentrations of residential and commercial densities and along planned future corridors with ongoing code amendments increasing housing density/flexibility within existing zoning districts. Code Amendment 2019-013 Street Connectivity will require smaller block lengths, perimeters and pedestrian/non-motorized pathways

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					<p>employees per acre within one-quarter mile of the corridor.</p> <p>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).</p> <p>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.</p> <p>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).</p> <p>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</p>	

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					urban fringe are not typically suitable for transit-oriented, high-density development.	
208	Ben Franklin Transit	07/13/2020	DEIS	Exhibit #N	<p>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."</p> <p>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 1-182. 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.</p>	<ul style="list-style-type: none"> Noted See comments response #207 regarding Code Amendment 2019-013
209	Ben Franklin Transit	07/13/2020	DEIS	Exhibit #N	<p>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</p>	<ul style="list-style-type: none"> Noted Results from the Comprehensive Plan Land Use / Traffic Forecast indicated decreased rates of increasing congestion that were mitigated by the added residential and commercial densities and locations throughout the proposed Urban Growth Area expansion The City intends to adopt Code Amendment 2019-013 addressing Street Connectivity before the end of 2020 which would require

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					<p>demand would also increase."</p> <p>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.</p> <p>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, 1-182, and the UGA and only accessible to the region along Road 100. For that reason, it is unclear whether the Broad moor area could ever support a convenient level of cost-effective transit service within or to the development.</p>	any/all new developments to conform to a more conducive land development pattern suited for multi-modal transportation
210	Ben Franklin Transit	07/13/2020	DEIS/ Comp Plan Vol 1	Exhibit #N	<p>Pages 47-48, Section 4.9.3 Mitigation Measures</p> <p>LU-1-A Policy: Maintain and apply current design standards for major public investments, particularly streets.</p> <p>TRI-J Policy: Encourage developments to meet the mission of the Pasco Complete Street Policy</p> <p>Unless the current street design standard is a complete street standard, these two policies</p>	<ul style="list-style-type: none"> • Noted • Policy TRI-J will be revised to state "require"

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					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.	
	Ben Franklin Transit	07/13/2020	DEIS	Exhibit #N	<p>Page 48, Section 4.9.3 Mitigation Measures</p> <p>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.</p> <p>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.</p>	<ul style="list-style-type: none"> Noted Land use compatibility is already discussed in Volume 2 of the Comp Plan. Final EIS will add clarification on land uses compatibility suitable for mitigation measures
211	Ben Franklin Transit	07/13/2020	DEIS/ Comp PLAN Volume 1	Exhibit #N	<p>Page 48, Section 4.9.3 Mitigation Measures</p> <p>TR-4-A Policy: Incorporate design and streetscape into all major arterial and collector streets as they are constructed.</p> <p>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?</p>	<ul style="list-style-type: none"> Noted Modify policy in the Comp Pan Vol 1 and reference to DEIS to state: Incorporate design and streetscape into all major arterial and collector streets.
212	Misek, Lauren	07/27/2020	UGA	Exhibit #P	<p>Interested in more neighborhood parks, playground constructions should be required as basic standards in developments</p> <p>Zoning and incentives for developing multiuse spaces, instead of sprawling strip malls, encourages density with forward thought into traffic/public transport needs</p>	<ul style="list-style-type: none"> The City currently requires a Park Impact Fee for each dwelling unit constructed An updated Parks & Forestry Plan will begin after the completion of the Comprehensive Plan The City is currently revising various sections of the Pasco Municipal Zoning and Subdivision Code including Development Standards to

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						incorporate/require more considerations for non-motorized users/uses and creation of walkable neighborhoods
213	Bachard, Tony	07/27/2020	UGA	Exhibit #Q	<p>I applaud the city's attempt to get ahead of the population growth. I have lived in city limits, lived in the "doughnut hole" and gone through annexation.</p> <p>The problem with the development of urban growth areas is the Franklin County Planning Commission does not adhere to any planning requirements. I have personally gone to several meetings and the commission sides with the developers every single time.</p> <p>Roads are not improved. During the development of Archer Estates and Spencer Estates along Bums and Kohler Road, the planning reports stated the roads are too narrow and not up to the standards the current amount of traffic requires.</p> <p>Even knowing this, the developers were not required to improve the roads. Despite having gang mailboxes on main arterial roads, no sidewalks were put in. Fences and brick walls were put up as development boundaries and no maintenance is provided, leaving a garbage and weed strewn road. Current county restrictions about access to arterial roads and house fronting them are also ignored in favor of maximizing developer's profits.</p> <p>All of these issues become a problem down the road when the urban growth area is eventually annexed into the city. At the very least it puts undue burden on homeowners. If these infrastructure problems are to be fixed, the homeowners have to fund a lid</p>	Noted

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					<p>out of their own pockets despite having paid taxes already.</p> <p>When putting in these new urban growth areas I urge you to go after the county and require them to adhere to the minimum level of city developments to avoid the problems the county keeps handing you.</p>	
214	Williams, Raymond	07/28/2020	DEIS	Exhibit #O	I have reviewed the subject EIS and my concerns are with basically dealing with growth in general, no matter which plan is followed. My concerns mainly with overall environmental issues impacting the planet and quality of life in general.	<ul style="list-style-type: none"> Noted The Draft EIS and FEIS will identify mitigation measures addressing environmental concerns
215	Williams, Raymond	07/28/2020	DEIS	Exhibit #O	<p>Traffic (Section 4-9)</p> <p>Road 100 -Access to 1-182</p> <p>Harris Rd to Sandifur road matchup. Harris needs to be extended to match up with Sandifur and share the signal that controlled access. Traffic from Harris Rd, wanting to continue east on Sandifur, is locked up when trying to turn left onto Broadmoor. At times, this can be a long wait.</p> <p>Road 36 and 44 Traffic Access to 1-182</p> <p>This area needs access to 1-182 to allow for traffic to enter directly the west bound lane. This would mitigate morning traffic headed to Richland and West Kennewick. An off ramp for eastbound traffic on 1- 182 to exit onto Argent, before the Argent underpass, would aid returning afternoon traffic. This addition will off load the Road 68 exchange.</p> <p>North Pasco to North Richland Bridge</p> <p>This bridge would funnel traffic to the City of</p>	<ul style="list-style-type: none"> The City has plans to re-align Harris Road to connect with Sandifur Parkway at Broadmoor Blvd The City has preliminary funding through the Transportation Improvement Plan to conduct a I-182 Corridor Study identifying potential solutions for connectivity and congestion The North Pasco to North Richland Bridge is identified in the 2018 Long-Range Metropolitan/Regional Transportation Plan through the Benton-Franklin Council of Governments. No Funding is secured.

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					Richland and the Hanford area. Richland is presently working with expanding their Northern area to provide spinoff growth relative to PNNL and Hanford related technology industries.	
216	Williams, Raymond	07/28/2020	DEIS	Exhibit #O	<p>Utilities (Section 4.10)</p> <p>Electric Power Homes in the low density areas larger than 3500 square feet should be required to have solar power systems. We live in an are where air condition is a driver to high electrical loads. It only makes sense that a home selling for \$500-?00k, should have a \$40k power system. Homes in the high and low density areas should have solar powered attic ventilation to reduce summer air conditioning loads. I have a solar powered fan in my attic and I have a one-story 2300 square feet home. My electric yearly electrical bill is divided by 12 and I have been paying \$75 per month or less</p>	Noted
217	Williams, Raymond	07/28/2020	DEIS	Exhibit #O	<p>Water</p> <p>Landscaping should be controlled to have minimum irrigation demand. Desert rockery and native steppe vegetation should be required, not large lawns. This would reduce the impact to City Water and Franklin Irrigation systems. I see irrigation water running down the gutter from homes north of me on my street every day. We waste a lot of water. We need to acknowledge that we live in a desert.</p>	Noted
218	Department of Natural Resources	07/28/2020	DEIS	Exhibit #P	The amendments, as proposed by the City, modify all of DNR's land use designations from Industrial to DNR Reserve Area. DNR is requesting that the land use designation of Industrial remain on all of its parcels in order to allow us to continue to prudently manage these parcels for the benefit of our trust	The City kept the DNR Reserve Lands designation for these lands but is reaching out to DNR to evaluate future options with them. The City also added a definition to the Land Use Classification based on the State DNR's Transition Lands Policy Plan describing the criteria used to define both

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					beneficiaries as explained in further detail below.	Urban and DNR Reserve Lands within the Urban Growth Area
219	Department of Natural Resources	07/28/2020	DEIS/ Comp Plan	Exhibit #P	DNR Reserve area is not defined. We have reviewed the documents provided within the Draft EIS as well as the documents listed on the City's comprehensive plan page including Volumes I and 2 of the Comprehensive Plan and the Land Capacity Analysis,. There is no definition of what DNR Reserve Area means other than to state that it is DNR land. This clearly doesn't articulate any meaning related to long-term planning within the comprehensive plan.	<ul style="list-style-type: none"> Noted Specific language identifying lands will be added to documents
220	Department of Natural Resources	07/28/2020	DEIS/ Comp Plan	Exhibit #P	<p>DNR Reserve area is an ambiguous designation. The only information provided to us regarding the justification for this new land use designation was an excerpt from a Planning Commission meeting in 2018 in which city staff presented information to the Planning Commission speculating on existing and future use of DNR's land.</p> <p>That excerpt is on Attachment B. The information provided in that statement is inconsistent with how DNR manages its lands and how we specifically manage these transition parcels. We cannot find anywhere in the supporting documents listed on the City's comprehensive plan web page, where the City justifies the land use designation change.</p> <p>The Land Capacity Analysis does not identify DNR land nor does it discuss the reason for its exclusion in the industrial land portion of the analysis. The Land Capacity Analysis does include a reference to RCW 36.70a.10(2) that states cities have discretion</p>	<ul style="list-style-type: none"> City is open to suggested designation form DNR that suites the DNR ownership and use

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					<p>to determine market factor (defined by Commerce as a "deduction from net developable area to account for lands assumed not to be developable in the planning period") based on local circumstances.</p> <p>If an assumption was made by city staff regarding DNR's future use of its properties then we would like to be provided with the documents that support that assumption.</p>	
221	Department of Natural Resources	07/28/2020	DEIS/ Comp Plan	Exhibit #P	<p>DNR ownership is the only industrial property impacted. The City has removed only DNR land from its industrial land use classification. Purportedly, the reasoning is due to its current agricultural use or non-industrial use. If this is true, the same change should apply to all other industrial land owners in this area that are not currently developing their land industrially.</p> <p>However, it does not appear that any other non-industrially developed state, federal, or private properties with current industrial land use designations have any proposed new land use designations.</p> <p>The GMA lists the protection of property rights as a goal in the development of plans and regulations. Government entities are required to consider the impact of their actions upon property rights and must refrain from arbitrary and discriminatory actions-- RCW 36.70A.020(6). The failure to do so constitutes noncompliance with the requirements of the GMA-AGO 1992 No. 23, at 7.</p> <p>Although this property is not privately owned, it is trust property, which must be administered by the</p>	<ul style="list-style-type: none"> The Final EIS and Final Comprehensive Plan (when approved/adopted) will include additional revisions to existing lands designated with the Industrial Land Use affecting the Port of Pasco, the Tri-Cities Airport and the Confederated Tribes of the Colville Reservation.

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					Department, as would a private trust-solely for the benefit of the trust, not the public in general. County of Skamania v. State, 102 Wn.2d 127,133,685 P.2d 576 (1984). The fact that only DNR land is singled out for a proposed land use designation change is contrary to the intent of the GMA.	
222	Department of Natural Resources	07/28/2020	DEIS	Exhibit #P	<p>Comprehensive Plan Elements. An amendment modifying the land use designation from industrial to DNR Reserve Area is inconsistent with the existing and proposed policies of the comprehensive plan. The inclusion of DNR's property within city limits and the UGA shows that the City recognizes the relevance of DNR's land to the city's historical and current growth patterns. Nothing has changed with DNR's property other than the City needing to justify its UGA expansion.</p> <p>Goal LU-2-A under the Land Use Element chapter requires that the City maintain an adequate amount of industrial land (among other land uses) proximate to appropriate transportation and utility infrastructure. Removing DNR land from the industrial land use designation in order to add additional industrial land currently outside of city limits skirts the intent of this goal. ED-2-C Policy within the Economic Development Element chapter provides direction to continue the pursuit and preservation of industrial sites for development that may be serviced by existing utilities. This policy continues to remain true for the DNR properties as most, if not all, of the properties have access to existing or planned utility infrastructure. In addition, as the City has previously determined in the land use designation process, the DNR properties are</p>	<ul style="list-style-type: none"> • The City proposed Urban Growth Area Expansion does not include any lands owned/operated by the Department of Natural Resources • All DNR Lands are within the existing City Limits and Urban Growth Area

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					located directly adjacent to developed industrial land along Highway 12 and Highway 395. Clustering planned or future industrial development within close proximity to other industrial developments is good planning policy.	
223	Department of Natural Resources	07/28/2020	DEIS	Exhibit #P	<p>Land Use Appeals. Although the underlying zoning of Light Industrial would remain in place and would continue to allow permitted industrial uses on DNR's properties, the concern DNR has with the proposed land use designation change relates to discretionary reviews and capital facility projects both of which would require the reviewing party to turn to the comprehensive plan to ensure the proposal would meet the goals and policies. The DNR Reserve Area designation is not defined so discretionary review would then turn to the public record to find the intent of the land use designation.</p> <p>In addition, most jurisdictions and funding agencies require documentation that any major capital facilities projects comply with the capital facilities plan, but also with the intent of the comprehensive plan. It seems that the intent by the City is to remove DNR land from the industrial land base and identify it as land that will not be developed. If that is the case (it is unclear as DNR Reserve Area is not defined), then the land use designation and zoning conflict with one another and one could argue that any development on the DNR properties is not consistent with the intent of the comprehensive plan.</p>	<ul style="list-style-type: none"> • Language clarifying the intent/purpose of the Department of Natural Resource Lands will be incorporated into relevant documents (EIS/Comprehensive Plan) • Including the industrial zoning (I-1) within the Department of natural Resources permitted zoning would comply with the DNR Land Use
224	Marvin, Marla	07/31/2020	DEIS	Exhibit #Q	I have read the DEIS and am surprised at so few alternatives. Given this limited choice, I definitely agree that #3 is the preferred. But I request further consideration of expansion of the UGB boundary to	<ul style="list-style-type: none"> • Noted; The Urban Growth alternatives were derived from the Scoped EIS issued in the Fall of 2018 which proposed three alternatives • Expansion east of HWY 395 for residential

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					the east and shrinking it to a straight line along Clark Road as its northern boundary. I was surprised to see no justification or explanation of why specific roads were chosen, so please add an explanation whether you take my suggestion or not	<p>growth is limited due to the existing industrial and heavy commercial uses.</p> <ul style="list-style-type: none"> Roads identified in the DEIS are prioritized based on projected and growth and assumed land uses.
225	Marvin, Marla	07/31/2020	DEIS	Exhibit #Q	<p>My chief concern is traffic congestion, primarily in I-182 interchanges. WSDOT shares my concern, based on its comments. WDOT comments note Pasco cannot assume improvements in state transportation infrastructure without working with and receiving commitments from WDOT, which apparently we do not have.</p> <p>Please seek and secure commitments from WDOT for improvements on Rd 68 and Rd 100 interchanges before approving this planned expansion north of the city, which feeds directly onto these two interchanges. Please take all care that Road 100/Broadmoor not become the abomination that is Road 68. (Never again should there be mid-block access to high-volume retailers [like Walmart] as was done on Rd. 68.)</p>	<ul style="list-style-type: none"> Noted The City is coordinating with the Washington State Department of Transportation, the Benton-Franklin Council of Governments, Ben Franklin Transit and others for the upcoming Transportation System Master Plan. The TSMP will provide refined projections for travel/congestion along with identifying future needs and solutions with applicable funding sources. Ongoing Code Amendment (CA2019-013) will emphasize street connectivity and access management
226	Marvin, Marla	07/31/2020	DEIS	Exhibit #Q	I was happy to see a green hatchmarked area along the Columbia River (Figure 4-5 map) on #2 and #3 suggesting a proposed new park. Please confirm that Pasco has purchased this area and will in fact provide public access to this beautiful river. Hopefully, it will be a mix of native plants/wild/restored areas preferred by non-human species, as well as manicured grasses preferred by many humans.	<ul style="list-style-type: none"> Noted These lands are currently owned and operated by the US Army Corps of Engineers are also identified in preliminary Broadmoor Master Planning efforts for natural/recreational use such as parks and open space.
227	Carosino, Bob	07/31/2020	DEIS	Exhibit #R	Failure to adequately analyze and discuss traffic and transportation impacts that will result from the City proposed Action Alternatives, including the Preferred Alternative	<ul style="list-style-type: none"> Transportation Impacts are identified on Page 44 Section 4.9

#	Commenter	Date Received	Item	Source	Comment (Rephrased, if necessary)	Response
228	Carosino, Bob	07/31/2020	DEIS	Exhibit #R	Failure to consider and include analysis of reasonable alternative geographic areas for the expansion of Urban Growth Boundaries around the city.	<ul style="list-style-type: none"> The Scoped EIS included alternatives to be considered was issued in Fall 2018 Alternative #3 was conducted with the use of a Land Capacity Analysis that identified vacant and underutilized lands that significantly reduced the expansion of the UGA by 30% Further redevelopment of lands within the city along corridors will be evaluated during updates to the Pasco Municipal Codes Zoning and Subdivision Regulations
229	Carosino, Bob	07/31/2020	DEIS	Exhibit #R	Failure to include an analysis of an Alternative providing for a substantially smaller northward expansion of the Urban Growth Boundary in the area northwest of Pasco .	<ul style="list-style-type: none"> Alternative #3 was conducted with the use of a Land Capacity Analysis that identified vacant and underutilized lands that significantly reduced the expansion of the UGA by 30% Increased Land Use densities and added Commercial Land Use permitted the reduction of Alternative #3's UGA boundary
230	Carosino, Bob	07/31/2020	DEIS	Exhibit #R	Failure to include an Alternative providing for redevelopment of lands already within city limits under zoning rules providing for enhanced density.	<ul style="list-style-type: none"> Alternative #3 was conducted with the use of a Land Capacity Analysis that identified vacant and underutilized lands that significantly reduced the expansion of the UGA by 30% Further redevelopment of lands within the city along corridors will be evaluated during updates to the Pasco Municipal Codes Zoning and Subdivision Regulations
231	Carosino, Bob	07/31/2020	DEIS	Exhibit #R	An alternative calling for reduced area of expansion in Northwest Pasco combined with expansion of the boundary in Northeast Pasco, or with redevelopment of lands within existing city limits.	<ul style="list-style-type: none"> The Scoped EIS included alternatives to be considered was issued in Fall 2018 Alternative #3 was conducted with the use of a Land Capacity Analysis that identified vacant and underutilized lands that significantly reduced the expansion of the UGA by 30% Expansion east of HWY 395 for residential growth is limited due to the existing industrial and heavy commercial uses.

#	Commenter	Date Received	Item	Source	Comment (Rephrased, if necessary)	Response
						<ul style="list-style-type: none"> Further redevelopment of lands within the city along corridors will be evaluated during updates to the Pasco Municipal Codes Zoning and Subdivision Regulations
232	Carosino, Bob	07/31/2020	DEIS	Exhibit #R	Failure to adequately analyze and include planning and discussion of parkland needs under any of the alternatives, especially the need for an urban multi-purpose riverfront park available to residents of northwest Pasco in the future.	<ul style="list-style-type: none"> SEPA requires evaluation of alternatives related to environmental effects. However the EIS does address recreation and parks through: 1) identifying existing park and open space lands and how each alternatives would modify or increase additional park and open space area (see Sections 3.2 and 4.1.1 and others and; 2) affected environment descriptions and mitigation measures (see Sections 4.4.3, 4.7 and 4.9)
233	WA Department of Archaeology & Historic Preservation	07/31/2020	DEIS	Exhibit #S	We note and support LU-8 on page 15 in the Land Use Element.	Noted
234	WA Department of Archaeology & Historic Preservation	07/31/2020	DEIS	Exhibit #S	<p>In particular we note and support policy LU-8-C; Pasco has adopted a comprehensive and proactive Historic Preservation Plan (HPP). Although in need of updating, the HPP provides the Pasco Historic Preservation Commission (HPC), City agencies, and Pasco citizens with sound guidance for leveraging historic preservation programs to achieve planning goals and implement other policies in land use, housing, economic development, and capital facilities planning.</p> <p>Therefore, we strongly recommend that the HPP be linked with text to other pertinent Land Use goals (such as LU-1 and LU-3) as well as the other planning goals and strategies, such as Economic Development, Housing (such as H-2), and Capital</p>	<ul style="list-style-type: none"> Noted Update as suggested

#	Commenter	Date Received	Item	Source	Comment (Rephrased, if necessary)	Response
					Facilities. Moreover, consider including the HPP as another element of the plan with cross references to other goals and strategies. Alternatively, include the HPP in the appendices. We strongly support the stated effort to monitor plus regularly report on how the HPP is being implemented.	
235	WA Department of Archaeology & Historic Preservation	07/31/2020	DEIS	Exhibit #S	In regard to ED-4, we recommend adding language to expand linkage to historic preservation. Suggested language might read something like the following: ED-5-D Policy: Continue following the Main Street Approach® in revitalization work in Downtown Pasco.	<ul style="list-style-type: none"> • Noted • Update as suggested
236	WA Department of Archaeology & Historic Preservation	07/31/2020	DEIS	Exhibit #S	In regard to IM-4 Goal, we note and support IM-4-C Policy. We strongly suggest including the Department of Archaeology and Historic Preservation in this policy as municipal ordinances and regulations that pertain to ground-disturbing projects and new construction have potential to affect archaeological resources and historic buildings and structures. See additional comments below regarding the DEIS.	<ul style="list-style-type: none"> • Noted • Update as suggested
237	WA Department of Archaeology & Historic Preservation	07/31/2020	DEIS	Exhibit #S	4.11 Heritage Conservation The DEIS needs additional narrative to establish the cultural sensitivity of the city and its Urban Growth Area (UGA). DAHP's Statewide Predictive Model categorizes the city and it's UGA as "high to very high risk" for encountering cultural resources. Discussion of this point is important to provide information upfront and early to property owners,	<ul style="list-style-type: none"> • Noted • Add information/narrative regarding DAHP's Statewide Predictive Model results and relevant guidance into EIS

#	Commenter	Date Received	Item	Source	Comment (Rephrased, if necessary)	Response
					<p>developers, and consultants engaged in the development process. All participants are benefitted by including predictability in the design, development, and construction process; furthermore, it will help to avoid costly delays when undiscovered resources are inadvertently damaged or destroyed.</p> <p>This additional narrative is important given Pasco's rapid development and growth rate plus high potential for the presence of archaeological resources in the region</p>	
238	WA Department of Archaeology & Historic Preservation	07/31/2020	DEIS	Exhibit #S	<p>DAHP appreciates that the City consistently provides project documentation to the agency for review and comment. However, concern is raised by what appears to be frequent absence of consideration, let alone implementation, of our comments and recommendations. An example would be when DAHP replies to a Notice of Application with a request for a survey to be conducted prior to construction taking place: To the best of our knowledge, the City rarely makes conducting a site survey a condition of a construction permit.</p> <p>We understand that the lead agency makes the final determination under SEPA. Nevertheless, DAHP recommends establishing a dialogue with the City to share our overall concerns and to better understand how the City's development regulations and ordinances are interpreted and applied to cultural and historic properties. In addition, we would like to discuss how the Comprehensive Plan can be used as a way to achieve greater protection for heritage resources in the city and UGA (see comment 4 above).</p>	<ul style="list-style-type: none"> • Noted • Additional staff work will be necessary to implement suggestions (thresholds) • Additional guidance/examples from DAHP jurisdictions • Add information to the Implementation Element of the Comprehensive Plan

#	Commenter	Date Received	Item	Source	Comment (Rephrased, if necessary)	Response
239	WA Department of Archaeology & Historic Preservation	07/31/2020	DEIS	Exhibit #S	<p>We do not see any discussion of thresholds and/or requirements for cultural resource surveys. In what situations will surveys be required by the City, both for archaeological and built environment resources that are over 50 years in age? Plus, will mitigation be provided if a project threatens to damage, alter, or destroy significant archaeological sites and/or historic buildings/structures?</p> <p>This would be a good place to refer to potential preservation benefits mentioned in the HPP as well as the tax incentives that the City makes available to property owners as specified in Section 20 of the Pasco Municipal Code.</p>	<ul style="list-style-type: none"> • Noted • Refer to HPP • Additional staff work will be necessary to implement suggestions • Add information to the Implementation Element of the Comprehensive Plan
240	WA Department of Archaeology & Historic Preservation	07/31/2020	DEIS	Exhibit #S	<p>On Page 56, it is inaccurately stated that the Tri-Cities Archaeological District “runs along the Columbia River bank and does not extend inland.” According to DAHP’s WISAARD database maps, while the District boundary does closely follow the Columbia River shoreline, it generally extends upland by a few hundred feet on both sides of the river.</p> <p>Therefore, we recommend revising the statement to read as follows:</p> <p>“Eight of these sites fall with the National Register..., which runs along the Columbia River bank including adjoining uplands.”</p> <p>This comment also applies to the Lower Snake River Archaeological District, which extends into the city’s Urban Growth Area (UGA). If the City does not have a data-sharing agreement with DAHP, we recommend exploring signing the agreement that</p>	<ul style="list-style-type: none"> • Noted • Update as suggested

#	Commenter	Date Received	Item	Source	Comment (Rephrased, if necessary)	Response
					would provide a designated City staff person with access to sensitive cultural resource site information. For more information about the data sharing agreement, please contact Morgan McLemore at Morgan.mclemore@dahp.wa.gov.	
241	WA Department of Archaeology & Historic Preservation	07/31/2020	DEIS	Exhibit #S	On page 54 under the heading “Pasco Cultural History” we recommend including some narrative about the impact of the construction and operation of the nearby Hanford Site on Pasco’s history and growth. A few sentences or paragraph should do well to summarize the major impact that Hanford has had on Pasco since the 1940s, including built environment resources constructed as a result.	<ul style="list-style-type: none"> • Noted • References to Hanford and the Department of Energy are identified on Page 38 (4.7.1 Affected Environment), 4.8.1 in the Final EIS
242	WA Department of Archaeology & Historic Preservation	07/31/2020	DEIS	Exhibit #S	<p>Two previous cultural resources reviews are mentioned on Pages 55-56 under “Previously conducted cultural resources review:” one for the Pasco Tri-Cities Airport and the other for the Broadmoor area. While it is interesting to note information about these two locations, there have been many more cultural resource reviews undertaken in Pasco and its vicinity.</p> <p>We recommend prefacing this section by making it clear that “the following are only two of many examples of cultural resource reviews undertaken in Pasco and Tri-Cities area.” Otherwise, it gives the impression to readers that no other such reviews have been undertaken, when they are, in-fact, routine occurrences.</p>	<ul style="list-style-type: none"> • Noted • Update as suggested
243	WA Department of Archaeology & Historic Preservation	07/31/2020	DEIS	Exhibit #S	On Page 56, historic farming activities are described as having caused a great deal of ground disturbance within the Broadmoor Area (and, presumably elsewhere). DAHP frequently cautions against this line of reasoning. Farming activities are not as destructive to buried cultural resources as often	<ul style="list-style-type: none"> • Noted • Refine or remove statement

#	Commenter	Date Received	Item	Source	Comment (Rephrased, if necessary)	Response
					assumed; the potential for intact cultural resources on agricultural land (previous and current) remains high.	
244	WA Department of Archaeology & Historic Preservation	07/31/2020	DEIS	Exhibit #S	<p>This section also mentions, the Franklin County Courthouse (Building #78002740, 1016 N. 4th St., Pasco) and the Pasco Carnegie Library (Building #82004212, 305 N. 4th St., Pasco) as listed in the National Register of Historic Places (NRHP).</p> <p>Please note that the James Moore House (Resource ID: 674795) is also on the NRHP. We also recommend mentioning that there are many other buildings and structures that are 50 years of age and older and that have been or should be inventoried and could be evaluated for NRHP eligibility.</p>	<ul style="list-style-type: none"> • Noted • Update as suggested • Refer to Pasco's Historic Preservation Plan (inventory)
245	WA Department of Archaeology & Historic Preservation	07/31/2020	DEIS	Exhibit #S	This discussion on pages 55-56 would be a good place to refer to the Historic Preservation Plan and its recommendations for inventory and designation of historic buildings, structures, sites, districts, objects, and landscapes in the city.	<ul style="list-style-type: none"> • Noted • Add reference to existing Historic Preservation Plan
246	WA Department of Archaeology & Historic Preservation	07/31/2020	DEIS	Exhibit #S	<p>Finally, please note that in order to streamline our responses, DAHP requires that Resource documentation (HPI, Archaeology sites, TCP) and reports be submitted electronically. Correspondence must be emailed in PDF format to sepa@dahp.wa.gov.</p> <p>For more information about how to submit documents to DAHP please visit: https://dahp.wa.gov/project-review. To assist you in conducting a cultural resource survey and inventory effort, DAHP has developed Guidelines for Cultural Resources Reporting. You can view or download a copy from our website.</p>	Noted

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Appendix A – Scoping Comments

City of Pasco 2018 Comprehensive Plan Update – EIS Scoping Comment Response Matrix

Comment No.	Commenter	Comment	Response
EIS Alternatives			
1	Futurewise	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 twenty-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.”	Comment noted and Alternative 3 includes an evaluation of higher density growth.

Comment No.	Commenter	Comment	Response
		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.	
2	Will Simpson, WA State Dept. of Commerce	<p>The City of Pasco is growing at a relatively high rate compared to other municipalities in Washington. The alternatives the City considers as it updates its Comprehensive Plan will have significant environmental and fiscal impacts for Pasco and the larger metropolitan area in the immediate future and beyond the twenty-year planning horizon. We support the City's decision to complete an EIS based on State growth forecasts for Franklin County and the City's allocated growth target from the County.</p> <p>The City's EIS will include detailed analysis about the impacts associated with new growth and potential UGA expansion areas to support that growth. Many of the environmental considerations addressed in an EIS will support Pasco's planning requirements under the GMA. The City may have other GMA requirements, such as those related to specific financing provisions, which may not be included in the EIS but that we recommend you consider as you review the alternatives and update your Comprehensive Plan and development regulations. We have structured our comments to address the EIS scope, and to offer general observations</p>	Comments are noted and to be addressed in the EIS

Comment No.	Commenter	Comment	Response
		regarding the GMA periodic update and statutory requirements. Based on the descriptions in the seeping notice, we believe that the "Compact Growth Target" alternative best meets the goals of the GMA and will allow the City to maximize the investments made in public infrastructure and the provision of public services.	
3	Robert Carosino	<p>The range of alternatives is clearly inadequate as there clearly are other reasonable alternatives which merit full and complete analysis in this DEIS. The City of Pasco is already on notice from the State Dept. of Transportation and other commenters, the expansion within the current city limits that is already foreseeable will lead to traffic in excess of interchange capacities at Roads 68 and Road 100 interchanges. Unfortunately, there is simply no way to adequately mitigate the horrendous traffic jams and unsafe traffic conditions which would be created by the proposed expansion of the Urban Growth Boundary in the area North of the existing City Limits in West Pasco as currently proposed by the Pasco alternatives. The Freeway I-182 access points simply cannot handle the proposed 55,000 additional residents which would be added to that area by development of this area under the City's proposed Comprehensive Plan updates and UGM boundary expansions in the area to the North of the West Pasco city limits. Nor would the main city and county feeder routes to these over-congested interchanges be able to be adequately expanded to handle the additional traffic. This factor alone</p>	<p>Industrial lands are designated on the eastern side of the City and also in the County, and future industrial growth is also projected to occur in this area.</p> <p>Existing vacant and underutilized lands within the City limits will be considered in Alternative 3. The City believes the three alternatives to be evaluated provide a range of appropriate future growth choices for consideration.</p>

Comment No.	Commenter	Comment	Response
		<p>mandates that an adequate EIS will need to consider other alternatives that do not provide for expansion of the UGA in the area to the North of the West Pasco city limits.</p> <p>Three additional alternative actions (a, b and c below), that would provide appropriate and reasonable alternatives, are the following, and must be fully analyzed in any DEIS meeting the requirements of SEPA:</p> <p>a) Analyze in full detail an alternative providing for expansion of the city in a different area from west Pasco. This alternative would provide for expansion of the UGA and the city, to allow residential development in the area to the EAST of the current city limits. This area is less valuable farmland, it has potential to for access to main highways (Highway 395 to the West, and highway 14 running east to west, that are more amenable to access by thousands of more people, and therefore would not create as excessive an adverse traffic impact on the interchanges in West Pasco. It would also avoid the unreasonable intermixing of high- density growth with low density growth which the city's proposed expansion of the UGA in the area north of west Pasco would create.</p>	

Comment No.	Commenter	Comment	Response
		<p>The area to the East of the city of Pasco has substantial undeveloped land that could be easily used for residential development if the city provided utilities, (just as the city would need to provide utilities to the area North of west Pasco under its proposed alternatives). The East Pasco alternative would have much better access to transportation corridors and the transportation corridors in that area can be more easily the residential expanded if required, as the land around the major roads are primarily farmland and level ground. Expansion of development in that area east of Pasco would also provide housing that is more closely located to the employment hubs of the city of Pasco, thus reducing that transportation impacts that would be created by any additional residential population in the west Pasco area of the city, thereby also mitigating impacts on transportation corridors.</p> <p>b) The second full new alternative that should be considered in the DEIS is a change in the city comprehensive plan to allow re-development of the lands within the existing city limits of Pasco to allow for high density residential development within the existing city limits. Many areas within the central core of the city of Pasco are in need of redevelopment due to age and condition, and a greater population could be easily accommodated by redevelopment with increased density in the existing city limits of Pasco, particularly in the area of the city to the south of Road 68 and West of I-182 , to the Columbia River on the south, comprising the old central core of</p>	

Comment No.	Commenter	Comment	Response
		<p>Pasco. By channeling development within that area, it would allow better access to major transportation corridors by the 3 interchanges on I-182 to the east of Rd 68, as well as access to other major transportation corridors connecting Pasco its industrial center, highways 395, and to cities to the south of Pasco. There are two bridges from this area of Pasco to Kennewick that are available, and these provide access to the highway 240 freeway running on the south side of the Columbia River through Kennewick. This alternative would lead to much lower over-congestion on the Road 68 and Rd 100 interchanges at I-182. It would also create the necessary density in a compact which would allow greater use of mass transportation alternatives.</p> <p>Recall that the State Department of Transportation has already advised the city, that with the reasonably foreseeable development of current lands within the existing City limits in the west Pasco area, the two west Pasco I-182 interchanges will be burdened far beyond capacity. It is unconscionable to imposed upon the residents of west Pasco, and those of northwest Franklin County in the area north of the current city limits, a proposal to include in this area even more residents that would require access through these two already over-congested freeway access points. Due to the topography of west Pasco, and existing development of the areas around the existing interchanges, there is no reasonable way to mitigate the significant adverse transportation and quality of line impacts from</p>	

Comment No.	Commenter	Comment	Response
		<p>additional development in west Pasco. No reasonable person living in those areas or moving into those areas, would be in favor of allowing such additional excessive development in that area, except land owners and developers, who have no concern for the long-term future adverse traffic and socio-economic impacts that residents would have to endure. The catastrophic traffic jams and unsafe traveling conditions that the city's expansion proposals would create, are clearly unacceptable and significantly adverse. It is clearly inadequate for the city to only propose expansion in the west Pasco (and the county area to the north of west Pasco) and not consider expansion in other areas of Franklin county. To suggest, as city planners have done in previous public hearings, that other cities and areas such as Seattle and King County have worse traffic conditions, and traffic "really is not that bad by our numbers" is not an acceptable response, nor one which gives any solace to residents of west Pasco or the county lands to the north. It is not the desire of the residents of west Pasco or west Franklin County to have roadway traffic congestion become more and more like the horrible traffic faced in the Puget Sound area. But it appears to be acceptable to the city.</p> <p>Furthermore, it would be a catastrophe for the city of Pasco to effectively take over land planning in the area of west Franklin county covered by the city's proposed alternatives, as the residents would be effectively disenfranchised from having the ability to control their own destiny. Due to</p>	

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		<p>a poorly written state law, the county residents would in effect have land use planned performed by the city, even though those residents remain residents of the county.</p> <p>c) The City's own proposed alternative growth target alternatives should be modified to stop the northern expansion of the UGA and limit the expansion of city limits under the city's current alternatives, to a northern city and UGA boundary line being established that is based upon the East to West leg of current Dent Road. This East to West line of Dent road would be used to create a northern boundary line that would run to the Columbia River on the west end, and Columbia River Road on the east end, using the same east to west line followed by Dent road. This smaller expansion of the UGA will minimize the area that can be developed for high density residential use. Providing city utilities to the county lands to the north of the proposed Dent road boundary line will only encourage excessive higher density development, creating unreasonable traffic impacts, and should not be allowed. High density development to the north of that boundary line would also create significant adverse impacts to the human environment and socio-economic impacts to current residents of the area of Franklin county north the current city limits, who have built suburban residences on large (acre size or more) lots, as part of a desire for suburban county living. The city plan would create a hop-scotch pattern of higher density development contiguous to and within areas of west Franklin</p>	

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		<p>county that under County standards require large lots and would adversely impact current residents with all the detrimental environmental, socio-economic, and traffic impacts which that higher density development entails.</p> <p>This alternative should also provide for a reduction in planned density in the north one-half mile segment of the UGA expansion area running south from the north end boundary created by the Dent road UGA line, such that it would harmonize and blend into the acre+ lots sizes existing within the County lands to the north of that point.</p>	
4	Laurie Ness	Thank you for considering my choice of Alternative 3. It supports less urban sprawl, less overall cost to the city and residents for services. Most importantly infill with smaller lots will conserve important farmland and preserve our important critical areas as required by the GMA.	Comment noted and addressed.
5	Michael Brightman	We think that alternative 3 (high density urban growth) makes the most sense for Pasco, the county and the State. Save prime agriculture land for future generations. Thanks for asking. I am an Architect and former planning commissioner	Comment noted and addressed.
Agriculture			
6	Will Simpson,	The City should consider how land use and UGA-sizing decisions could	The preferred alternative proposes less acreage for UGA

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	WA State Dept. of Commerce	affect any designated resource lands of long-term commercial significance, or lands currently farmed or irrigated. Agriculture is critical to the local, regional, and State economy. We encourage efforts to limit or minimize any impacts to productive agricultural lands, particularly those formally designated by Franklin County or where public investments in irrigation infrastructure exist.	expansion, which would protect more county/ Ag land, and promote compact development within the City limits and UGA.
7	Futurewise	The relationship to existing land use plans is an element of the environment. 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 preferred alternative avoids prime designated agricultural lands and is expected to have minimized impacts to these lands.
Critical Areas			
8	Will Simpson, WA State Dept. of Commerce	The City should consider how future growth and potential land use changes would affect critical areas. The City may choose to limit the inclusion of significant critical area ecosystems in potential UGA expansion areas because these sites are not able to support urban densities and provide important ecosystem functions in an undisturbed state. The Department of Ecology, Department of Fish and Wildlife, and the Department of Natural Resources each offer expert technical guidance on environmentally sensitive areas in your region.	The proposed expansion area has very limited critical area in existence.

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9	Futurewise	<p>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. 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.</p> <p>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. Protecting fish and wildlife habitats and rivers and streams will help maintain the economic benefits of outdoor recreation for Franklin County.</p>	Comments are noted for the protection of priority species and habitats to be addressed in the EIS.
10		<p>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</p>	Will verify whether Natural Heritage Program identifies any plant listings for this area. If they exist, identify ways to protect resources/mitigate impacts.

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		<p>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.” The communities of native plants and wildlife that make up the iconic Columbia Basin shrub-steppe have been severely diminished. Today, less than 50% of Washington’s historic shrub-steppe remains, and much of it is degraded, fragmented, and/or isolated from other similar habitats. 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. Plants and habitats for and numbers or diversity of species of plants and unique species are all elements of the environment. 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.</p>	Habitat preservation to be addressed in the EIS
Growth			
11	Will Simpson, WA State Dept. of Commerce	<p>One of the first steps in the development of an EIS is describing the proposal. The proposal should be described in terms of an objective, or purpose and need. For an EIS such as this, we recommend describing purpose and need in terms of the amount of residential, commercial and industrial growth anticipated based on the adopted growth target. Differing alternatives should represent alternative strategies that accommodate the</p>	Comment noted; this information will be accounted for.

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		same amount of growth.	
12		<p>Franklin County has already coordinated with the municipalities in the County on the selection of an OFM population projection and allocations of population growth to cities, including Pasco. The process utilized OFM's medium series for Franklin County, which is the most likely population projection based on current demographics, and the allocations are supported in the County's record.⁵</p> <p>Our administrative rule recommends the County adopt a twenty-year countywide employment forecast for allocation between UGAs and the rural area. ⁶ The countywide forecast and resulting employment allocations to the Pasco UGA should establish the basis for projected commercial and industrial lands in the region? In regards to industrial needs, we recommend that the City and County consider industrial capacity in Benton County and Western Walla Walla County. The City of Kennewick recently completed an industrial lands analysis, which considered capacity in both Benton and Franklin County. This may represent a good starting point for evaluating industrial capacity in Pasco and the region. Ultimately, this approach ensures that UGAs are adequately sized, and that newly designated industrial land does not saturate the existing market and undercut public investments made in existing industrial areas.</p>	<p>This information will be considered along with existing industrial land use.</p> <p>A land capacity analysis to be performed.</p>

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13		The GMA requires internal and external consistency for locally adopted plans and development regulations. The Comprehensive Plan must use the same growth figures and planning timelines in each element. Plans adopted reference, such as sewer or water system plans, that are necessary for meeting capital facilities element requirements must also be consistent.	Comment noted.
Transportation			
14	Will Simpson, WA State Dept. of Commerce	We encourage close coordination with staff at the South Central Region of WSDOT as you consider alternative growth scenarios and potential UGA amendments. Pasco's projected growth requires careful planning and potential improvements for both the local and State systems. The City must estimate traffic impacts to state-owned transportation facilities resulting from land use assumptions to assist WSDOT in monitoring performance, and plan improvements for State facilities. Adequate transportation systems are necessary for urban development. Impacts extend throughout the metropolitan area, so development patterns in one area can create traffic impacts several miles away. WAC 365-196-430 and RCW 36.70A.070(6) provide specific recommendations on meeting GMA requirements and developing a transportation element that is consistent with the land use element.	Comment noted and being followed up.
15		Proposed UGA changes may directly or indirectly affect operations or plans for the Tri-Cities Regional Airport. This airport is a critical component of the State and region's transportation infrastructure,	This information will be considered.

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		and significant for future economic growth in the region. According to WSDOT, the number of enplanements has increased by nearly 100,000 over the last five years. The growth projected for Pasco, and the larger metropolitan area, suggests increased demand is likely on this facility. Land and Shoreline use is an element of the environment evaluated in the SEPA analysis. This review should include land use compatibility with the tri-cities regional airport for any alternatives that would change the land use in the area surrounding the airport. We encourage the City and County to continue coordinating with the Washington State Department of Transportation Aviation Division. Proposed UGA changes may necessitate additional consultation required under RCW 36.70.547 prior to adopting plans or regulations that may affect property adjacent to public use airports.	
16		The projected growth will require significant investments in capital facilities and public services. Any UGA changes require developing a financially constrained capital facilities and transportation element showing how proposed areas will be provided with adequate public services. These amendments must address the required components of the capital facilities and transportation elements described in RCW 36.70A.070. The City should not merely rely on assurances of availability from other service providers if relying on plans adopted by reference or assurances from other service providers to meet	Capital Facilities and Transportation Elements, and an updated Capital Facilities Plan for the UGA will address this comment.

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		<p>capital facilities requirements.</p> <p>Our Capital Facilities and Transportation Guidebooks provides recommendations on developing a detailed capital facilities and transportation plans, along with a more general plan that extends to the full twenty-year planning horizon. Our guidebook on Urban Growth Areas also contains important information regarding the relationship between UGA sizing decisions and infrastructure investments.</p>	
17		<p>Transportation systems, vehicular traffic, the movement and circulation of people or goods, and traffic hazards are elements of the environment. Air traffic is also an element of the environment. 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.</p>	

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18	Paul Gonseth, WSDOT	<p>WSDOT previously commented to Franklin County regarding the City of Pasco proposal to expand approximately 4,800 acres to its UGA to accommodate future growth projections. It is our conclusion that buildout of the current vacant and re-developable lands within the existing Pasco urban growth area will cause the interchanges on interstate 182 (1-182) to fall below acceptable levels of service as the local connections to the state system are already suffering. The state highways are an integral part of the transportation network in the Pasco area.</p> <p>The Determination of Significance and SEPA Notice identifies three alternatives and we conclude that all three alternatives will have negative impacts to the state transportation system which includes the Tri-Cities Airport. The Environmental Impact Statement will need to complete a land capacity and traffic analysis for both the current and future conditions for each alternative. The analysis needs to include the state transportation system as part of the study. Special attention should be focused on State Route (SR) 395 and 1-182. The EIS should show what the proposed land use changes are and where they are located. The current and future traffic analysis must not include any improvements to the state system without agreement from WSDOT.</p>	Comments noted and followed up.

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UGA Expansion			
19	Will Simpson, WA State Dept. of Commerce	The City's EIS represents a non-project action and provides the basis for future project decisions. It should address the cumulative impacts of urban growth anticipated over the twenty-year planning horizon - 2018 to 2038.	Comment noted
20		The City is required to include areas and densities sufficient to permit projected urban growth. This includes residential growth associated with population projections, along with the broad range of needs that accompany the projected growth including (as appropriate) medical, governmental, institutional, commercial, service, retail, and other non-residential needs.3 RCW 36.70A.110(3) provides direction on how urban growth should be prioritized	Comment noted
21		<p>A land capacity analysis is critical step in determining whether Pasco is able to accommodate future urban growth and whether UGA amendments are necessary. One of the primary objectives of the periodic update is to ensure that sufficient capacity of land suitable for development is available over the twenty-year planning period to support necessary housing and employment growth, along with the other broad range of needs and uses that accompany urban growth.</p> <p>The City should reevaluate the preliminary land capacity analysis conducted</p>	County analysis had limitations, so City is conducting a separate analysis.

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		by Franklin County and determine how much capacity is available within the existing UGA. The final land capacity analysis should clearly identify assumptions about development, redevelopment, partially developed properties, lands needed for public purposes, and densities. After identifying projected needs for population and employment growth, the land capacity analysis will establish whether changes are needed to the UGA boundary. At this point other factors such as the cost of capital facilities or transportation infrastructure may require further consideration of different UGA configurations. It is critical that the growth projections and land capacity analysis establish the basis for any UGA amendments to ensure consistency with the GMA.	
22		<p>Pasco and Franklin County are required to ensure that urban growth occurs within Pasco's designated UGA. Based on historical development patterns in the Pasco UGA, we have concerns that the City and County are not meeting their GMA requirements to ensure urban densities through zoning, adopted development regulations, and infrastructure investments. Urban density is a density for which cost-effective urban services can be provided. Higher densities generally lower the per capita cost to provide urban governmental services.</p> <p>Housing units inside the UGA allowed on half or one-acre lots, which may rely on septic systems or private wells, create a long-term financial</p>	<p>Alternatives evaluation will include densities evaluation. Alternative 3 increases densities. City sewer plans show sewer extensions and lift stations for lower density areas in west Pasco. Sewer has been a limitation in the past but plans are being made to address this issue.</p>

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		<p>challenge in providing capital facilities and urban services. This is particularly problematic when assessing the complete life cycle of infrastructure costs, and ongoing operation and maintenance.</p> <p>We recognize that coordinating development review in the unincorporated UGA is challenging and may require collaboration not only with Franklin County, but potentially with other</p> <p>service providers as well. As part of the periodic update, we strongly encourage the City and County to establish an inter-local agreement or similar mechanism to ensure that future development occurs at urban densities, and that permitted development does not limit the ability to provide public services and infrastructure in a financially realistic manner.</p>	
23	Maria Sanchez	<p>As the city of Pasco faces a time of continued population growth, I strongly recommend that you maintain the current Urban Growth Area and optimize use of the existing infrastructure. Currently, Pasco is a sprawling city of mostly one-story buildings with acres of asphalt devoted to parking. It would be financially prudent for the city to concentrate on infill for new housing and businesses to increase density and make the city more walkable and to allow public transit to function more efficiently.</p>	<p>City has adopted a Complete Street Ordinance and has focused on centers for multi-modal transportation. BFT planning park and ride at Broadmoor.</p>

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		<p>Even if the new developments on the outskirts of town were to be built at a higher density than the last iterations, residents would still find themselves forced to drive to reach the downtown area or commercial areas like that on road 68. This low-density density design produces less revenue for the city as property tax per acre, and increases future financial liability by committing the city to many more miles of roadway, sewer lines, electric lines, traffic congestion, etc.</p> <p>Pasco is in an excellent position right now to make sensible choices for the financial future of the city by planning for better walkability, transit options, and a vibrant downtown center filled with people and businesses rather than parking lots. A dense, walkable city is the type of place that educated young people, empty-nesters and corporate headquarters seek out. There is vast potential for improvement within the current urban boundaries. Build up, not out.</p>	
Water			
24	Will Simpson, WA State Dept. of Commerce	The City must ensure that they have sufficient water rights to support new growth or UGA expansions. The analysis should clarify how much inchoate water is available under the Quad City Water Right to support additional growth, and what growth, if any, is supported by irrigation water rights. Much of the residential water use in the semiarid west is for	City operates 14 irrigation circles to dispose of food processing wastewater. Wastewater returns also reduce water consumption.

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		lawn irrigation. This is especially true in the summer when water is most scarce. The City should consider the water demands for different development pattern alternatives. Large-lot development typically has much higher water demands because of seasonal irrigation than small lot, or multi-family development. It is important for the city to understand how the zoning decisions will impact the long-term water budget and the availability of water to support growth for the 20-year plan horizon and beyond. Water-efficient land uses, including higher density zoning for multifamily development, or limitations on irrigation-dependent landscaping (xeriscaping), relate to density decisions and the ultimate UGA configuration. The City and County may consider how promoting efficient water use development patterns will save resources to support more growth beyond the twenty-year planning horizon.	City also has code provision for xeriscape in commercial areas.
25	Futurewise	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. 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. 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	Water resources information and analysis, including existing conservation plans, will be considered.

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		analyzed in the EIS.	
Miscellaneous			
26Y	Futurewise	Housing is an element is an element of the environment. Different alternatives may have different impacts on the affordable housing. For example, different alternatives may displace existing affordable housing which maybe a significant adverse impact that should be analyzed in the EIS.	Alternatives will include consideration of a variety of housing densities. ADU already allowed.
27		Residential growth in the City of Pasco has increased the exposure of residents on the Wildland Urban Interface to wildfires. Expanding the city onto agricultural and rural lands will increase this expose. Fire services are an element of the environment. 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	Irrigation exists surrounding the City, and this significantly reduces wildfire risk.

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		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.	
28		Historic and cultural preservation are elements of the environment. 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. The predictive model shows that Pasco and the urban growth expansion area has a "high risk" and "very high risk" of cultural resources in these areas. 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.	Cultural resources will be considered in the EIS evaluation.
29		Air quality is an element of the environment. 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	The preferred alternative is geared towards a pedestrian friendly environment. City encourages walkability and bike usage. City has regulations for dust control during construction. Broadmoor Park and Ride will help too.

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		<p>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 TriCities. 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.</p> <p>Climate is also an element of the environment. 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</p>	

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		<p>need to drive, reducing the amount of greenhouse gas emissions. 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.</p> <p>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 growth, pollution prevention and designed for environment. 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.</p>	