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October 1, 2020

The Honorable Saul Martinez, Mayor
The Honorable Blanche Barajas
The Honorable Ruben Alvarado
The Honorable Pete Serrano
The Honorable David Milne
The Honorable Craig Maloney
The Honorable Zahra Roach
City of Pasco City Council
City Hall
525 N. Third Ave.
Pasco, Washington 99301

Dear Mayor Martinez and Councilmembers Barajas, Alvarado, Serrano, Milne, Maloney, and Roach:

Subject: Comments on CPA2020-001: Urban Growth Area and CPA2020-002: Comprehensive Plan Update. Sent via email to: martinezcouncil@pasco-wa.gov; barajascouncil@pasco-wa.gov; alvaradocouncil@pasco-wa.gov; milnecouncil@pasco-wa.gov; maloneycouncil@pasco-wa.gov; roachcouncil@pasco-wa.gov; gonzalezjb@pasco-wa.gov; whiter@pasco-wa.gov

Thank you for the opportunity to comment on the CPA2020-001: Urban Growth Area and CPA2020-002: Comprehensive Plan Update. Futurewise works throughout Washington State on the implementation of the Growth Management Act (GMA). We work with local communities to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. We have members across Washington State including in the City of Pasco.

Futurewise has been engaged in the Pasco UGA expansion and comprehensive plan for a couple of years and we have raised issues about the expansion into agricultural lands. We are asking the City of Pasco to not expand into valuable agricultural lands. Concentrating growth in the urban core helps preserve valuable resources. Futurewise recommends that the City focus on infill and missing middle housing capacity – particularly along transit routes and within the urban core. Missing middle housing are house-scale buildings with multiple units in walkable neighborhoods. These building types, such as duplexes, fourplexes, cottage courts, and courtyard buildings, provide diverse housing options and support locally serving retail and public transportation options. Multi-modal transportation options and amenities, safer streets, and gathering spaces bring people together, create community and help businesses prosper. This should be a central part of our regional growth management strategy and integral to the Pasco Comp Plan.



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We recommend that the comprehensive plan update incorporate the following principles:

- Do not plan for increased residential development around the Tri-Cities Airport. Building residential uses north and west of the runways will make future expansion of the airport expensive if not impossible, the new residential uses will be adversely impacted by the airport noise and flights, and the new residential uses will make airport operations more difficult long-term because of complaints.
- Include compact urban growth areas that are well designed and well furnished with amenities, encompassed by natural resource lands and a rural landscape. In addition to creating a city with a high quality of life, this will save taxpayers and ratepayers money.¹
- Design walkable neighborhoods with the densities and a mix of zoning to support local businesses and safe streets, with bike lanes and frequent transit to promote environmental and community health and reduce traffic congestion. This will reduce transportation costs, make neighborhoods more convenient, and increase opportunities for healthy activities.
- Provide for a long-term capital facilities plan that will ensure that taxpayers in existing City of Pasco neighborhoods do not end up subsidizing the public facilities and services in new neighborhoods. This will also save money for taxpayers and ratepayers.
- Reinvest in existing neighborhoods and businesses such as historic downtown Pasco. This improves the City of Pasco's economy and quality of life.

Remove Barriers to Increasing Density and Implement HB 1923 Zoning Changes to Increase Housing Capacity

Increasing density and encouraging a variety of housing types can help accommodate growth while helping with affordability and maintaining community character. In their two part report, "Finding 'Missing Middle' Housing," The Municipal Research and Services Center (MRSC), explains that, "Allowing and encouraging 'missing middle' housing types can provide more affordable living options, particularly for the growing number of one- and two-person households in our communities, and provide it in a way that is compatible with existing neighborhoods. This approach can also contribute to other community goals, such as accommodating future population increases, increasing walkability, and supporting neighborhood businesses."²

The City received funding from the Department of Commerce under HB 1923 to cover the costs of planning for zoning changes with the City to:

¹ John Carruthers and Gudmaundur Ulfarsson, *Urban Sprawl and the Cost of Public Services* 30 Environment and Planning B: Planning and Design 503, 518 (2003) enclosed in a separate email with Futurewise's letter the Pasco City Council (June 19, 2020) with the filename: "Urban sprawl and the cost of public services.pdf."

² Finding Missing Middle Housing, The Municipal Research Services Center (MRSC), accessed September 30, 2020 <http://mrsc.org/Home/Stay-Informed/MRSC-Insight/March-2019/Finding-Missing-Middle-Housing-Part-1.aspx>.

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- Authorize at least one duplex, triplex, or courtyard apartment on each parcel in one or more zoning districts that permit single-family residences.
- Authorize cluster zoning, or lot size averaging in all zoning districts that permit single-family residences.
- Authorize accessory dwelling units (ADUs) on all parcels containing single-family homes.

The changes should be integral to the housing capacity analysis included in the comprehensive plan. Additional land capacity analysis of denser zoning codes could be included in the Comprehensive Plan in Table LU-6.

The proposed UGA expansion paves over working farms designated by Franklin County as agricultural lands of long-term commercial significance

Franklin County has designated most of the land in the proposed UGA expansions as agricultural lands of long-term commercial significance. The Franklin County Growth Management Comprehensive Plan³, adopted February 27, 2008, on page 93 says:

“In Franklin County agricultural lands of long-term commercial significance are soil classification 1-3 according to the Land Capability Classification of the USDA Soil Conservation service. Further, the County’s Prime, Unique and of State and Local Significance soils as generally shown and mapped by the Franklin Conservation District on Map 8, are also described as agricultural lands of long-term commercial significance in Franklin County.”

Map 8 is on page 96, is entitled Agricultural Lands, and shows large areas included in the proposed UGA expansion as Agricultural Lands.

Furthermore, in a new report, the American Farmland Trust has identified much of the UGA expansions as “nationally significant agricultural land.”⁴ Nationally significant agricultural land is a designation for farmland that is best suited for long-term cultivation and food production.⁵ It was developed by the *Farms Under Threat* study in consultation with experts.⁶ The report exposes the threats facing working farms and policy efforts, state by state, to slow the pace. The U.S.

³ *Franklin County Growth Management Comprehensive Plan* p. 96 (Agricultural Lands map) (Adopted Feb. 27, 2008 Resolution Number 2008-089) accessed on September 30, 2020 at:

http://www.co.franklin.wa.us/planning/documents/2008ComprehensivePlan-Entirepdfwebsite_000.pdf and on the data CD enclosed with Futurewise’s June, 11 2020, letter to the City of Pasco Community and Economic Development Department with the filename 2008ComprehensivePlan-Entirepdfwebsite Franklin Cty.

⁴ American Farmland Trust, *Farms Under Threat Washington* webpage accessed on September 30, 2020 at: <https://csp-fut.appspot.com/> and map of nationally significant farmland is enclosed in a separate email with the filename: ATF National Significant Farmland North of Pasco.pdf.

⁵ Julia Freedgood, Mitch Hunter, Jennifer Dempsey, and Ann Sorensen, *Farms Under Threat: The State of the States* p. 64 (American Farmland Trust: 2020) accessed on September 30, 2020 at: https://s30428.pcdn.co/wp-content/uploads/sites/2/2020/09/AFT_FUT_StateoftheStates_rev.pdf.

⁶ *Id.*

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Department of Agriculture Natural Resources Conservation Service identifies 2,898.6 acres, 83.5 percent of the proposed UGA expansions, as prime farmland and farmland of statewide importance.⁷ These are U.S. Department of Agriculture classifications for highly productive farmland.⁸ As the above quotation shows, they are also designated by Franklin County as agricultural lands of long-term commercial significance.⁹ Most of the land in the UGA expansion alternatives are also currently used for agricultural production.¹⁰

“Since before statehood, fertile soils, available irrigation water, sunny skies and long summer daylight hours have made agriculture a cornerstone for economic development” in Franklin County.¹¹ The American Farmland Trust estimates that between 2001 and 2016, 97,800 acres of agricultural land was converted in Washington State “enough land to generate \$61 million in annual revenue.”¹² Given the economic value of agriculture to the City of Pasco and Franklin County and the productivity of the farmland in the proposed UGA expansions, we urge the City Council to deny the proposed UGA expansions.

In addition to these important policy reasons for not paving over farmland, the Growth Management Act (GMA) prohibits including agricultural lands of long-term commercial significance within an UGA unless the county or city has 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.¹³ We were unable to find a purchase or transfer of development rights program or agricultural comprehensive plan designation or zone in either the Pasco Municipal Code or the proposed comprehensive plan. So it is not legal to include the agricultural lands of long-term commercial significance in the UGA.

⁷ Soils Pasco Proposed Urban Growth Area (UGA) Expansion June 2020 enclosed with Futurewise’s June 15, 2020 comment letter on the Draft Environmental Impact Statement (Draft EIS); Soil Map—Franklin County, Washington (Pasco UGA Expansion NW Part) pp. 1 – 23 (6/4/2020) enclosed in a separate email with the filename: “Pasco NW UGA Expansion Soil_Map.pdf” and Soil Map—Franklin County, Washington (Pasco UGA Expansion NE Part) pp. 1 – 28 (6/4/2020) enclosed in a separate email with the filename: “Pasco NE UGA Expansion Soil_Map.pdf.”

⁸ 7 Code of Federal Regulations (CFR) § 657.5(a) & (c).

⁹ *Franklin County Growth Management Comprehensive Plan* p. 93, p. 96 (Agricultural Lands map) (Adopted Feb. 27, 2008 Resolution Number 2008-089).

¹⁰ Soil Map—Franklin County, Washington (Pasco UGA Expansion NW Part) p. 1 (6/4/2020) and Soil Map—Franklin County, Washington (Pasco UGA Expansion NE Part) p. 1.

¹¹ *Economic Development Plan Franklin County, Washington* Res. 2016-211 p. 5 last accessed on September 30, 2020 at: http://www.co.franklin.wa.us/planning/documents/2016EconDevPlan_May_2019.pdf and enclosed on the data CD accompanying Futurewise’s June 11, 2020, letter to the City of Pasco Community and Economic Development Department with the filename: “2016EconDevPlan_May_2019.pdf.”

¹² American Farmland Trust, *Farms Under Threat: The State of the States Agricultural Land Conversion Highlight Summary Washington* p. *2 (2020) accessed on September 30, 2020 at: https://storage.googleapis.com/csp-fut.appspot.com/reports/spatial/Washington_spatial.pdf and enclosed with Futurewise’s letter the Pasco City Council (June 19, 2020) with the filename: “Washington_spatial.pdf.”

¹³ RCW 36.70A.060; *Futurewise v. Benton County and the City of Kennewick and the Kennewick Industrial District, LLC*, Eastern Washington Region Growth Management Hearings Board Case No. 14-1-0003, Final Decision and Order (Oct. 15, 2014), at 30 – 36 of 38.

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The proposed UGA expansions will interfere with future expansion of the Tri-Cities Airport and bring residences closer to the airport, making operations more difficult and adversely impacting the new residents

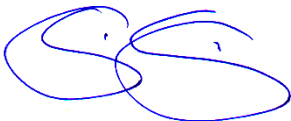
Like the high-quality farmland, the Tri-Cities Airport, is an important regional economic asset.¹⁴ Unfortunately the UGA expansion will cutoff future expansion opportunities at the north end of the runway.¹⁵ The planned residential uses close to the airport will adversely impact the operations of the airport and the airport operations will adversely impact the residential uses. This is another reason to deny the UGA expansion.

Thank you for considering our comments. If you have questions, please contact Alison Cable at telephone 206-343-0681 x114 and email: alison@futurewise.org or Tim Trohimovich at telephone (206) 343-0681 Ext. 102 and email: tim@futurewise.org.

Very Truly Yours,



Alison Cable
Tri-Cities Program Manager



Tim Trohimovich, AICP
Director of Planning & Law

Enclosures

¹⁴ “The Tri-Cities Airport (PSC) is the largest airport in the Southeastern Washington and Northeastern Oregon region and the fourth largest air carrier airport in the state of Washington with connections to eight major hubs.” Port of Pasco, Tri-Cities Airport • PSC webpage accessed on Oct. 1, 2020 at: <https://www.flytricitie.com/>.

¹⁵ Proposed LU-1 Future Land Use Map.