



Lower Columbia Basin Audubon Society

A CHAPTER OF THE NATIONAL AUDUBON SOCIETY

P.O. Box 1900 • Richland, WA 99352

26 June 2018

Senator Patty Murray
Senator Maria Cantwell
Representative Dan Newhouse

Dear Senator Murray, Senator Cantwell, and Representative Newhouse:

The Lower Columbia Basin Audubon Society is opposed to the TRIDEC proposal to convey Corps-held land along the shoreline of the Tri-Cities to local city and county governments. We are perturbed by the lack of public discussion of this proposed transfer. We also question that there is broad support in the general population of our community for a land transfer whose end result will be to encourage commercialization of our existing rivershore parks.

We have several concerns regarding the proposed reconveyance:

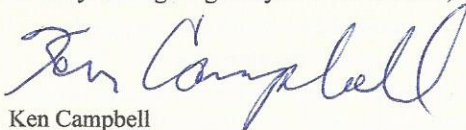
1. **Ecological issues:** The Columbia River corridor with its adjacent floodplains and riparian vegetation is extremely important habitat for a multitude of species including endangered fish species. For example, Audubon has documented more than 180 species of local and migratory birds at Bateman Island, a natural open space park located on the Columbia River. The Corps has preserved ecological buffer strips along many stretches of the Columbia River waterfront to provide fish and wildlife habitat and to protect water quality. If the waterfront were to be developed, the quality of habitat for birds living and moving through our community would be greatly compromised. Indeed, one of the arguments by the proponents of reconveyance is that the remaining parks should include more grassy areas and river views; this would directly impact the ecological function of the river and the habitat available for wildlife. Riparian habitat has often been illegally destroyed by adjacent homeowners who want a view. The Corps has been more responsive than the cities to complaints about destruction of habitat along the shoreline; citizens depend on the Corps to enforce the protection of habitat.
2. **Transparency issues:** While there has evidently been outreach during the past few years to chambers of commerce, Rotaries/Kiwanis, businesses, and developer groups, there has been no outreach to the general public or to environmental groups in particular. The proposed legislation for reconveyance would bypass a full public NEPA/ESA/NHPA process which would include public scoping meetings. Once the cities/counties own the land, it's not clear if NEPA and its scoping meetings would be applicable. Any regulations (such as SEPA or even NEPA if it were required) would only come into play piecemeal when the cities transfer or sell parcels of land to other entities. Our local governments would not consider the impact on the river system as a whole which would contravene the purpose of the NEPA process. The longterm plans of the cities are unknown and have not been discussed publicly. Once reconveyance occurs, there is nothing to stop the cities from selling off the parks to the private sector. A full NEPA scoping process should be mandatory prior to any legislation requiring reconveyance so that the public would know and be able to comment on what TRIDEC and the municipalities are proposing for our shorelines.
3. **Costs:** The city councils of Pasco and Richland invited the Corps to a workshop this past May to provide information about the costs associated with reconveyance. It is disturbing that legislation had already been drafted before the cost issues were discussed by at least two of the cities involved. And the costs are potentially significant, including several million dollars for the replacement of pumps, operation costs of

\$1.3 million per year, and employment of ~10 FTEs for these activities. The general public is unaware of these costs and their associated consequences (either a burden to the taxpayer or a 'need' by the municipalities to 'monetize' our parks)

4. **Value of open spaces (parks and natural areas) along the rivers:** The citizens of the Tri-Cities value their open spaces. In Richland, for example, the 2015 citizen survey stated that "Protecting open space was the main message reiterated throughout the comments received."¹ The Conservation Futures measure on the ballot in 2014 also indicated strong support among voters in Benton County for preserving open space. Data from the Benton County Auditor's website showed almost 47.5% voting for this additional tax; in Richland this number was 55%.
5. **Economic benefits of keeping parks and natural areas along the river:** Rivershore parks, open spaces, and public access have not stunted our economic growth, contrary to the arguments of proponents that land-use restrictions in areas along the river stunt development. Our robust economy is due in part to the quality of life provided by these public spaces, an attribute that attracts new residents and employers. Nationally, communities are finding that conserving open space and carefully siting developments are essential to growing the economy. Development that destroys valued community resources and natural features is both economically and environmentally wasteful. Studies comparing the fiscal impacts of development to those of open space protection have found that open space preservation has a very positive impact on a community's economy. Recreation, parks, and open space are some of the highest priorities for companies and workers relocating to a given area. They are also key to attracting tourists. The Tri-Cities is lucky to have a mainly open undeveloped rivershore. As our communities continue to grow, it's important to maintain the remaining natural habitat as a resource the cities can offer our residents and tourists. We think the Corps will do a better job of this than the cities.
6. **Other alternatives:** The 1996 Water Resource Development Act (WRDA) gave the Corps authority to reconvey lands along the Columbia River shoreline to the cities; there would be no cost for park and recreational purposes. One of the reasons that the cities are unhappy with the WRDA is that it would preclude commercial development along the rivershore without payment of fair market value; the currently proposed legislation would eliminate that obstacle to commercial development. Under this WRDA, the cities have lowered ~3 miles of levees. The cities complain that the process of dealing with the Corps is too slow. But the cities also contribute to the delays. A recent study² by the Corps concluded that the risk factor along the Pasco levee is lower than previously believed, allowing for the lowering of more of the levees once Pasco develops a design plan. Kennewick City Council has proposed reconveying part of Columbia Park and the Corps had started the full NEPA process, but the City has chosen to delay the discussion while it revises its Parks and Recreation Comprehensive Plan.

For these reasons we urge you to oppose legislation that is being pushed through this year that would force the conveyance of Corps land to the municipalities. At the very least, this proposal should involve a more detailed, robust, and inclusive discussion than has transpired thus far.

Thank you for giving this your consideration,



Ken Campbell
Vice President, Lower Columbia Basin Audubon Society

¹2015 Richland Community Survey (<https://www.ci.richland.wa.us/home/showdocument?id=2036>)

²US Army Corps of Engineers 17-018 Four Idaho, Washington dams plus McNary Levee System reclassified as safer by Corps of Engineers. (<http://www.nww.usace.army.mil/Media/News-Releases/Article/1096206/17-018-four-idaho-washington-dams-plus-mcnary-levee-system-reclassified-as-safe/>)