EXHIBIT LIST FOR CUP 2026-009
Interstate Concrete and Asphalt

Hearings Examiner Staff Memo Exhibit List - October 16, 2026 hearing		
HEM 1.1	Staff Memo	October 6, 2026
HEM 1.2	Vicinity map	April 10, 2026
HEM 1.3	Application for CUP 2026-009	April 6, 2026
HEM 1.4	Reclamation Site Plan for CUP 2026-009	April 6, 2026
HEM 1.5	Written Determination of Completeness	April 10, 2026
HEM 1.6	Agency Review request	April 14, 2026
HEM 1.7	Application for EA 2026-008	April 6, 2026
HEM 1.8	Site Plan for EA 2026-008	April 10, 2026
HEM 1.9	Critical Habitat Report	April 6, 2026
HEM 1.10	Comment from Benton Clean Air Agency	April 14, 2026
HEM 1.11	Comment from Public Comment - Essig, James	April 14, 2026
HEM 1.12	Comment from Benton County Public Works	April 22, 2026
HEM 1.13	Comment from Deptartment of Archaelology & Historic Preservation	April 24, 2026
HEM 1.14	Comment from Washington Department of Fish & Wildlife	April 24, 2026
HEM 1.15	Comment from Public Comment - Cuevas, Gerardo	April 27, 2026
HEM 1.16	Comment from Department of Ecology	April 28, 2026
HEM 1.17	Comment from Washington State Department of Transportation	April 29, 2026
HEM 1.18	Response to Public Comment - Cuevas, Gerardo	April 29, 2026
HEM 1.19	Response to Public Comment - Cuevas, Gerardo	May 5, 2026
HEM 1.20	Cultural Resources Report	June 15, 2026
HEM 1.21	DAHP Concur with Survey	July 6, 2026
HEM 1.22	Critical Areas Supplement - Farallon Consulting/Grette Associates	July 30, 2026
HEM 1.23	MDNS Issued - EA 2026-008	July 30, 2026
HEM 1.24	Fallon Mitigation Recommendations - EA 2026-008	September 3, 2026
HEM 1.25	Comment from Benton County Building Department	September 9, 2026
HEM 1.26	Comment from Department of Ecology	September 17, 2026
HEM 1.27	Comment from Washington Department of Fish & Wildlife	September 18, 2026
HEM 1.28	Clarification Email from Applicant	October 7, 2026
HEM 1.29	Notice of Open Record Hearings	September 25, 2026
Exhibits Submitted During Hearing or while record remained open		

Community Development Department
102206 E Wiser Parkway
Kennewick, WA 99338

Planning Division
(509) 786-5612
Planning.department@co.benton.wa.us

HEM 1.1

STAFF REPORT TO THE
BENTON COUNTY HEARINGS EXAMINER
Interstate Concrete – Gravel Mine

FILE NO:	CUP 2026-009
MEMO DATE:	October 6, 2026
HEARING DATE:	October 16, 2026
APPLICANT:	Interstate Concrete C/O Jana McDonald, PO Box 3366 Spokane, WA 99220.
OWNERS:	Farmland Reserve Inc. and AgReserves Inc. C/O Jens Rasmussen, 60 E South Temple Suite 1600, Salt Lake City, UT 84111.
LOCATION:	General Location: The property is located approximately 2.16 miles southwest of the intersection of Plymouth Road and SR 14 in the Plymouth area of unincorporated Benton County, Washington. Legal: Portions of Sections 1, 2, 11, and 12, Township 5 N, Range 27 E, W.M. Parcel Numbers: 101571000002004, 112572012982001, 102571000003000, 111571013428001, and 111571000001003.
PROPERTY SIZE:	Parcels total approximately 1,206 acres.
AREA TO BE USED:	Approximately 220 acres.
LAND USE:	Industrial and agricultural.
ZONING:	Growth Management Act Agricultural District (GMAAD) and Heavy Industrial (HI).
COMPREHENSIVE PLAN DESIGNATION:	Growth Management Act Agriculture (GMA AG) and Rural Industrial (RI).

RECOMMENDATION:

The Planning Division recommends approval of the application request, subject to the suggested twenty-three (23) Findings of Fact and six (6) Conditions of Approval as outlined in this staff report.

APPLICATION DESCRIPTION:

The applicant is seeking a Conditional Use Permit (CUP) under BCC 11.17.070(w) and BCC 11.35.060(c) which allows commercial sand and gravel pits, stone quarries, other mineral extraction, asphalt and/or concrete batching plants in the Growth Management Act Agricultural District and Heavy Industrial District. If granted, this CUP would allow for the continuation of mineral extraction and operation of a commercial gravel mine, to include mining, crushing,

washing, processing, stockpiling, sales of material, and concrete and/or asphalt plants.

The mining operation proposes to extract and process approximately 7 million cubic yards of material using portable and/or stationary equipment over a span of 15-20 years. Hours of operation for the mine and approximately 10-25 employees are expected to range from 6:00am-8:00pm to 24/7 depending on market demands. Blasting will occur as needed, crushing is expected to occur 4-6 months a year, and wash plant will remain on site all year round. (HEM 1.3) (HEM 1.28)

The subject property as well as surrounding properties are currently utilized for industrial and agricultural purposes. Proposed structures for the project are industrial in nature and include the following as well as associated components that are necessary to the operation of the mine: a crusher, drive over scale, concrete batch plant, silos, baghouses, control houses, hot mix asphalt plant and maintenance shop. (HEM 1.2).

The application for CUP 2026-009 was submitted to the Benton County Planning Division on April 03, 2026. (HEM 1.3)

The application for EA 2026-008 was submitted to the Benton County Planning Division on April 03, 2026. (HEM 1.7)

The applicants submitted a Critical Habitat Report, and Reclamation Plan on April 03, 2026. (HEM 1.9) (HEM 1.4)

The application was declared complete for processing on April 10, 2026. (HEM 1.5)

The application documents were distributed to reviewing agencies on April 14, 2026. (HEM 1.6)

The applicants submitted a Cultural Resources Report on June 15, 2026. (HEM 1.20)

The Benton County Hearings Examiner Notice of Open Record Hearing for application CUP 2026-009 was published on September 30, 2026 the Prosser Record Bulletin. (HEM 1.29)

The Notice was mailed to property owners of record within 300 feet of the outer boundaries of the parcel on September 25, 2026.

The Open Record Hearing is scheduled for October 16, 2026.

APPLICABLE STANDARDS/ORDINANCES:

1. *Benton County Comprehensive Plan*

   3.3.2.3 Rural Land Use Designations

   Rural Industrial includes both heavy and light industrial uses in the County. The primary purpose of this land use to provide land for industrial and supporting uses that will not present unmanageable conflicts with other land uses, that have access to necessary utilities and public facilities, and that have less environmental constraints. Some of the heavy industrial uses function at the fundamental economic level: rail transport and facilities operations, chemical products manufacturing and shipment for agriculture, sand and gravel operations for construction, raw products processing, and waste products recycling.

3.3.2.5 Agricultural Land Use Designation

GMA Agriculture (GMA AG) includes agricultural land (such as dryland and irrigated land) identified by the County based on the criteria established by the GMA. A GMA Agricultural District zone conserves agricultural lands by establishing a 20-acre minimum parcel size and (with exceptions e.g., resort destinations, wineries) limits the range of other land uses to those which are dependent upon, supportive of, ancillary to, or compatible with, agricultural production as the principal land use.

2. *Benton County Code (BCC)*

Title 11 Zoning

Chapter 11.17 Growth Management Act Agricultural District (GMAAD)

Section 11.17.070 Uses Requiring a Conditional Use Permit

(w) Commercial sand and gravel pits, stone quarries, other mineral extraction, asphalt and/or concrete batching plants.

Chapter 11.35 Heavy Industrial (HI)

Section 11.35.060 Uses Requiring a Conditional Use Permit

(c) Sand and/or gravel pit, stone quarry, mining, crushing, stockpiling of mineral resources and similar uses for the development of natural resources extracted on-site.
(d) Asphalt plant.
(e) Concrete plant.

Chapter 11.50.040 Conditional Use.

Section 11.50.040 (a) Conditional Use Permit- General Standards.

The conditional use permit application process allows the Hearings Examiner to review the location and design of certain proposed uses, the configuration of improvements, and the potential impacts on the surrounding area. The application process also allows the Hearings Examiner to ensure that development in each zoning district protects the integrity of that district. The notice, hearing, decision, and enforcement procedures are as set forth herein and in BCC 11.50.050.

Certain uses are classified as conditional uses because of their unusual nature, infrequent occurrence, special requirements, or potentially significant impacts to the environment, public infrastructure, or adjacent properties, and/or possible safety hazards and other similar reasons.

Once granted, a conditional use permit may be transferred by a holder thereof after written notice to the Hearings Examiner; provided the use and location must remain the same and the transferee must continue to comply with the conditions of the permit and, if applicable, the requirements set forth in Chapter 11.51 BCC.

Section 11.50.040 (d) Conditional Use Permit- Permit Granted Or Denied.

A conditional use permit shall be granted only if the Hearings Examiner can make findings of fact based on the evidence presented sufficient to allow the Hearings Examiner to conclude that, as conditioned, the proposed use:

(1) Is compatible with other uses in the surrounding area or is no more incompatible than are any other outright permitted uses in the applicable zoning district.
(2) Will not materially endanger the health, safety, and welfare of the surrounding community to an extent greater than that associated with any

other permitted uses in the applicable zoning district.

(3) Would not cause the pedestrian and vehicular traffic associated with the use to conflict with existing and anticipated traffic in the neighborhood to an extent greater than that associated with any other permitted uses in the applicable zoning district.

(4) Will be supported by adequate service facilities and would not adversely affect public services to the surrounding area; and

(5) Would not hinder or discourage the development of permitted uses on neighboring properties in the applicable zoning district as a result of the location, size or height of the buildings, structures, walls, or required fences or screening vegetation to a greater extent than other permitted uses in the applicable zoning district.

It is the applicant's burden to present sufficient evidence to allow the above conclusions to be made. If such evidence is not presented or all necessary reasonable conditions are not identified by the applicant so as to allow the Hearings Examiner to make the conclusions required above, the conditional use application shall be denied.

PUBLIC NOTICE:

The Public Notice Requirements for this application as per BCC 11.50.050(b) are as follows:

1. The Planning Division shall provide written notification for an open record hearing, subject to the rules and regulations set forth in RCW 36.70. Written notice shall be mailed at least twelve (12) days in advance of the open record hearing to the applicant and the owner of the parcel(s) to which the proposed variance or conditional use permit would apply, and to all owners of real property, as shown in the records of the Benton County Assessor, located within a distance of three hundred (300) feet of any portion of the applicable parcel, provided that if the owner of the parcel for which the proposed variance or conditional use permit is requested owns another parcel or parcels adjacent the parcel at issue, notification shall be mailed to owners of real property located within three hundred (300) feet of any portion of such adjacent parcels as well. Failure to receive the notice shall not invalidate any proceedings or decision in connection with the proposed variance or conditional use permit. Notices addressed to the last known owner of record as shown on the County Assessor's records shall be deemed proper notice to the owner of such property; and,

2. By publication of a legal notice in a newspaper of general circulation in the County at least ten (10) days prior to the open record hearing date.

PUBLIC COMMENTS:

1. The Notice was mailed to property owners of record within 300 feet of the outer boundaries of the parcel on September 25, 2026.
2. The following was received from Gerardo Cuevas on April 27, 2026 (HEM 1.15):
    a. Hello good evening I received a paper on the mail that a project of gravel mining would be taking place near my land and they also showed a map and it highlights the surrounding area do you know if they will be making a road to be able to access where they will be mining or will I have to attend the hearing to find that out my parcel id for my land is 10257400001000.

3. The following information was provided to Gerardo Cuevas on April 29, 2026 (HEM 1.18):
    a. Upon reviewing the application materials provided by the applicant there are no road locations indicated. Often times with mining operations road locations can change so there aren't always defined easements or roads. I will get ahold of the applicants to inquire if they have any plans for access roads at this time. I will get back to you when I have more information.
4. The following information was provided to Gerardo Cuevas on May 5, 2026 (HEM 1.19):
    a. The applicant was able to provide me with some additional information regarding the access roads to the proposed mining operation. They will continue to use the existing road system and have no plans of creating any new roads or access easements on site or to any adjacent parcels. Please let me know if you have any follow up questions or comments.

AGENCY COMMENTS:

1. The application documents were distributed to the following reviewing agencies on April 14, 2026:
    a. Benton County Public Works Department
    b. Benton County Code Enforcement
    c. Benton-Franklin Health District
    d. Benton County Fire District #6
    e. Benton County Building Division
    f. Benton County Fire Marshal
    g. Benton REA

2. The following was received from the **Department of Archaeology and Historic Preservation** on April 24, 2026 (HEM 1.13):

    a. Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) and providing documentation regarding the above referenced project. As a result of our review, our professional opinion is that part of the project area has the potential to contain archaeological resources. The project is in an area determined to be at Very High- risk along Four Mile Canyon Creek. Further, there is a sensitive pre-Contact site in Four Mile Canyon 113m south of the Project Area, adding to the risk of archaeological resources being present. The scale of the proposed ground disturbing actions would destroy any archaeological resources present. Identification during construction is not a recommended detection method because inadvertent discoveries often result in costly construction delays and damage to the resource. Therefore, we recommend a professional archaeological survey with testing of the portion of the project area depicted in the attached map be conducted prior to ground disturbing activities. We also recommend continuing consultation with the Affected Tribes' cultural committees and staff regarding cultural resource issues.

    b. These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with Washington State law. Should additional information become available, our assessment may be revised.

    c. Thank you for the opportunity to comment on this project and we look forward to receiving the survey report. The survey report should be uploaded directly into the DAHP Online WISAARD system by the cultural resource consultant to expedite DAHP review. Please ensure that the DAHP Project Number (a.k.a. Project

Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports.

d. For more information, please contact the Washington State Department Archaeology and Historic Preservation at (509) 783-1304.

3. The following updated comment was submitted by the **Washington State Department Archaeology and Historic Preservation** on July 6, 2026 (HEM 1.21):

   a. Thank you for contacting the State Historic Preservation Officer (SHPO) and the Department of Archaeology and Historic Preservation (DAHP) with documentation regarding the above-referenced project. In response, we concur with the results and recommendations made in the report entitled "Cultural Resources Review and Inventory for the Agri-Northwest Industrial Park Project, Areas 2, 3, 5, and 6, Benton County, WA," (Wilde, Gallagher et al. 2024). specifically, we have made the following determinations of eligibility for the National Register of Historic Places (NRHP) based on the report findings:

   b. Archaeological Resources

      i. Not Eligible for the NRHP but protected under RCW 27.53, and must be avoided: 45BN02498

      ii. Not Eligible for the NRHP: 45BN02390, 45BN02391, 45BN02392, 45BN02393

   c. Because no eligible resources were found within the area of effect during the survey we do not recommend further direct archaeological supervision of the project. However, if the boundary of the APE changes or encroaches on 45BN02498, the site must be avoided or an archaeological permit must be applied for and granted prior to disturbance (RCW 27.53.090, .095). If the project boundary approaches the site boundary a temporary, high-visibility barrier fence must be installed at least 50' offset from the official site boundary. Failure to comply with RCW 27.53.090 can result in costly project delays and significant fines. We do recommend that a standard Inadvertent Finds Plan is followed during all ground disturbing activities.

   d. Please note that the recommendations provided in this letter reflect only the opinions of DAHP. Any interested Tribes may have different recommendations. We appreciate receiving copies of any correspondence or comments from Tribes or other parties concerning cultural resource issues that you receive.

   e. These comments are based on the information available at the time of this review and on behalf of the SHPO pursuant to Washington State law. Please note that should the project scope of work and/or location change significantly, please contact DAHP for further review.

   f. Please contact the Department of Archaeology and Historic Preservation at (509) 783-1304 for more information.

4. The following was received from the **Benton Clean Air Agency** on April 14, 2026 (HEM 1.10):

   a. It has come to our attention that you are reviewing a proposed project which will include a rock quarry, concrete and asphalt plant, for the above named applicant in Benton County, WA.

b. Washington Administrative Code (WAC) 173-400-110 New source review for sources and portable sources, including the operations described above, may require:

(2) Approval requirements.

(a) A notice of construction application must be filed and an order of approval must be issued by the permitting authority prior to the establishment of any new source… (rock crusher, concrete and asphalt plant)

c. Benton Clean Air Agency Regulation 1 requires that any rock crushing, concrete or asphalt facility must first file a Notice of Construction (NOC), submit the appropriate filing and engineering fees, and receive an approval to operate prior to operation of the source.

d. Please contact the Benton Clean Air Agency at (509) 783-1304 for more information.

5. The following comment was submitted by the **Washington State Department of Transportation** on April 29, 2026 (HEM 1.17):

a. The subject property is in the vicinity of State Route 14 (SR 14), a partially controlled limited access facility with a posted speed limit of 65 miles per hour. WSDOT has acquired all access rights to the highway. Access to the property is available via the Plymouth Industrial Road intersection at milepost 178.90 Rt. Direct access to SR 14 is prohibited.

b. All loads transported on WSDOT rights-of-way must be within the legal size and load limits or have a valid oversize and/or overweight permit.

c. It is the applicant's responsibility to keep and maintain SR 14 free of any of their debris. Any spilled material shall be promptly cleaned up at the applicant's expense.

d. For more information, please contact the Washington State Department of Transportation at (509) 577-1635.

6. The following comment was submitted by the **Washington State Department of Ecology** on April 28, 2026 (HEM 1.16):

a. Water Quality Program

The Sand and Gravel General Permit (SGGP) from the Department of Ecology (Ecology) regulates discharges of process water, stormwater, and water from mine dewatering into waters of the state associated with sand and gravel operations, rock quarries, and similar mining operations. The permit also covers concrete batch plant and hot-mix asphalt operations.

All new facilities and un-permitted existing facilities that intend to obtain coverage, and permitted existing facilities planning a significant process change must submit a complete and accurate Notice of Intent (NOI). The Permittee must submit the NOI no less than one hundred and eighty (180) days before beginning any activity that may result in the discharge of any pollutant.

To apply, go to Ecology's Sand and Gravel General Permit webpage. For technical assistance, contact Alex Barnes, Sand & Gravel General Permit Manager at alex.barnes@ecy.wa.gov or by phone at (509) 746-8415.

b. Shorelands and Environmental Assistance (SEA) Program

Thank you for the opportunity to review this project. The National Wetlands Inventory, USGS Topographic Maps, Aerial Photos, and the National Hydrography Dataset all indicate an intermittent or ephemeral stream occupying Fourmile Canyon. There is indication of distinct bands of vegetation that may indicate presence of wetlands. Prior to any ground disturbing activities that will impact this area we recommend that a Qualified Wetland Professional conduct a wetland determination and delineation following the Army Corps of Engineers Wetland Delineation Manual and Arid West Supplement and a wetland rating following the Washington State Wetland Rating Manual for Eastern Washington.

Please reach out to Ryan Anderson (509) 379-1917 or ryan.anderson@ecy.wa.gov with any questions.

c. Spills Preparedness, Prevention and Response Program

A SPCC plan may be required if oils are stored onsite (diesel, asphalt, etc) (40 CFR 112). Please refer to those regulations for any requirements needed to be met in order to have aboveground storage tanks onsite. Describe the number of storage tanks planned, their capacity, and type of oil service each will have. Include whether or not they are horizontal or vertical tanks and shop built or field constructed.

Provide design code used to design and construct each tank.

Provide inspection code used to inspect each tank (API 653, STI SP00l, etc).

Provide details for secondary containment type(s) for the tanks.

Provide details for oil transfers will occur to supply each tank.

Thank you for considering our comments. If you have any questions or would like to respond to our comments, please contact Angela Deardorff-Zeigenfuse, Project Specialist with the Spills Program (360) 480-2263 or by email at angela.zeigenfuse@ecy.wa.gov.

d. Water Resources Program

In Washington State, prospective water users must obtain authorization from the Department of Ecology before diverting surface water or withdrawing ground water, with one exception. Ground water withdrawals for a project up to 5,000 gallons per day used for single or group domestic supply, up to 5,000 gallons per day used for industrial Benton County Planning Department purposes, stock watering, and for the irrigation of up to one-half acre of noncommercial lawn and garden are exempt from the permitting process. Water use under the RCW 90.44.050 exemption establishes a water right that is subject to the same privileges, restrictions, laws and regulations as a water right permit or certificate obtained directly from Ecology.

If you have any questions or would like to respond to these Water Resources comments, please contact Nathan Longoria at (509) 907-1752 or email at Nathan.Longoria@ecy.wa.gov. Ecology's comments are based upon information provided.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

e. If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

7. The following comment was submitted by the **Washington State Department of Fish and Wildlife** on April 24, 2026 (HEM 1.14):

   a. The Washington Department of Fish and Wildlife (WDFW) has reviewed relevant maps and documents for the proposed Interstate Concrete and Asphalt Commercial Plant (EA 2026-008, CUP 2026-009). Development on Parcel # 1-1257-201-2982-001/ 188322 S Plymouth Industrial Rd.

   b. The Critical Habitat Report breaks the areas down into three zones, but it is unclear as to what areas within each zone are proposed for work under the proposed permit. The Reclamation Plan shows Zone 1 as a mix of proposed and future work, Zone 2 as Phase 1 and 2 work, and Zone 3 as a mix of Phase 2, 3, and 4 work with a large area where no work is proposed at all. WDFW would like to ask for a clarification of the work areas as well as how the survey area was selected.

   c. The Critical Habitat Report states that "no critical fish and wildlife habitat was confirmed" for Zone 1 but then notes the presence of shrubsteppe overstory vegetation. Aerial photographs indicate that these small pockets of shrubsteppe vegetation may be occurring on the far eastern comer and near the power line area. WDFW would like clarification on these locations as well as if there is a plan to preserve them on site or mitigate for their loss.

   d. The Critical Habitat Report states that "no critical fish and wildlife habitat was confirmed" for Zone 2, but the photographs provided seem to potentially contain native shrubs and bunchgrasses. This seems to indicate the presence of vegetation that is consistent with WDFW's current definition of shrubsteppe habitat.

   e. The Critical Habitat Report notes the presence of shrubsteppe habitat in Zone 3 and specifically calls out the areas to the east of Fourmile Creek. The report states that this area is not designated for active mining, but the Reclamation Plan denotes this area as Phases 2-4. WDFW would like clarity on what work will be occurring in Zone 3.

   f. While the shrubsteppe habitat within the survey area may be impacted by ongoing activities in the area, it still provides functions and values that are that are utilized by PHS species. The project area is mapped as shrubsteppe habitat on WDFW's Priority Habitats and Species (PHS) maps as well as Ferruginous Hawk home range habitat. Additionally, there are observations of Burrowing Owl and Sage Thrasher a short distance to the west of the project area.

   g. WDFW recommends that The County and project developers work together to develop a mitigation plan in accordance with Benton County Code 15.02.220 to avoid impacts to and/or provide mitigation for any loss of shrubsteppe habitat functions and values on the site. WDFW would like to request a site visit to clarify if there is shrubsteppe habitat on the site and to discuss any proposed mitigation

measures prior to the issuance of the Conditional Use Permit.

h. Many birds local to our area as well as active nests are listed as "protected wildlife" under RCW 77.12.020(3). To avoid impacts to protected songbird species, WDFW recommends avoiding beginning any work on the site in the spring or summer nesting seasons (February 15 - July 31). If this is not possible for this project, please contact WDFW Area Habitat Biologist Troy Maikis (troy.maikis@dfw.wa.gov) to discuss potential survey, avoidance, and monitoring protocols.

i. WDFW looks forward to working with Benton County on this project to ensure the best outcome for the county, its residents, and our local wildlife.

j. For more information, please contact the Washington State Department of Fish and Wildlife at (509) 575-2740.

8. The following updated comment was received from the **Washington State Department of Fish and Wildlife** on September 18, 2026 (HEM 1.27):

a. The Washington Department of Fish and Wildlife (WDFW) has reviewed the Mitigated Determination of Non-Significance (MDNS) for the proposed Interstate Concrete and Asphalt Commercial Plant (EA 2026-008, CUP 2026-009) development on Parcel# 1-1257-201-2982- 001/ 188322 S Plymouth Industrial Rd. WDFW submitted a letter on April 24, 2026 requesting clarification on the habitat quality within Zones 1 and 2, information about what, if any, work will be done in Zone 3, and for a mitigation plan to be prepared. WDFW received copies of the "Critical Areas Support Response" document and the "Plymouth Site Zone 3 Mitigation Recommendations" document on September 17, 2026.

b. WDFW would like to note that the Critical Areas Support Response document only contains a small portion of WDFW's definition of shrubsteppe; focusing only on shrub canopy. WDFW defines shrubsteppe as a nonforested vegetation type consisting of one or more layers of perennial bunchgrasses and a conspicuous but discontinuous layer of shrubs. The definition goes on to note that shrubsteppe disturbed by fire may lack some habitat components during periods of post-fire recovery (including shrub cover). The document incorrectly concludes that "based on (WDFW's) definition, shrub-steppe habitat is characterized by a cover of any of the aforementioned shrubs of more than 5%."

c. The Critical Areas Support Response document maps 20 acres of shrubsteppe habitat within Zone 2. This area has direct connectivity to larger areas of shrubsteppe habitat in all directions (although it is less preferable than undisturbed habitat, agricultural fields do provide permeability for many wildlife species to access the greater landscape, and a railroad track is not an impermeable barrier), as well as important water sources in Fourmile Canyon and the Columbia River. The document states that these "patches of habitat support reduced functions and values." Therefore, WDFW recommends mitigation of "equivalent or greater biological functions" as outlined in Benton County Code 15.14.040(e).

d. WDFW is unclear why the mapped area of shrubsteppe habitat in Zone 3 changed from 40 acres in the Critical Areas Support Response document to 20 acres in the Plymouth Site Zone 3 Mitigation Recommendations document. As aerial images provide evidence of agricultural activities in Parcel 111571000001003 to the west of Fourmile Canyon, WDFW is in agreement with the removal of this area from the

mapped shrubsteppe in both documents. However, WDFW does not see any evidence provided in any of the reports to support the idea that the areas to the east of Fourmile Canyon do not provide any of the functions and values associated with shrubsteppe habitat. These areas should not be considered to be "reclaimed to agriculture land use" as they have not historically been used for agricultural purposes.

e. WDFW recommends the entirety of the 40-acre area of continuous shrubsteppe habitat in Zone 3, as mapped in the Critical Areas Support Response document, be preserved as a 2: 1 mitigation for the loss of 20 acres of shrubsteppe habitat in Zone 2, as outlined in Benton County Code 15.02.220. If this is deemed not feasible, and The County deems it necessary to impact the portion of Zone 3 outside of Parcel 11157100000 I 003 that is outlined in the Plymouth Site Zone 3 Mitigation Recommendations document, WDFW recommends that any disturbances be "reclaimed" not to agricultural lands but instead be re-seeded and monitored to ensure it achieves equivalent or greater habitat functions and values following the conclusion of the project. WDFW recommends a re-seeding and monitoring plan be in place prior to any disturbance on the site.

f. WDFW concurs with the Critical Areas Support Response document recommendation to conduct nesting bird surveys and implement nest protection measures as applicable prior to any work during the spring and summer nesting seasons.

g. WDFW appreciates the opportunity to provide input on this MDNS document and assist Benton County and Interstate Concrete and Asphalt to ensure the best outcome for the project, The County, its residents, and our local wildlife.

h. Please contact the Washington State Department of Fish and Wildlife at (509) 312-8117 for more information.

9. The following comment was received from the **Benton County Building Division** on September 9, 2026 (HEM 1.25):

   a. Project must comply with all current Benton County building and fire codes.

   b. Please contact the Building Division at (509) 735-3500 for more information.

FINDINGS OF FACT AND CONDITIONS OF APPROVAL:

The following Findings of Fact and Conditions of Approval are based on comments received up to the date of this staff memo. Any comments received after the completion of this staff memo or submitted during the advertised public hearing for CUP 2026-009 will need to be considered by the Hearings Examiner and may be added to the suggested Findings of Fact and Conditions of Approval as set forth below. The Hearings Examiner may decide to adopt these as their own or amend/add to these Findings of Fact and Conditions of Approval after holding the open public hearing.

Based on the information received to date, Planning staff recommends approval of the applicant's request with the following suggested findings of fact and conditions of approval:

SUGGESTED FINDINGS OF FACT

1. The applicant is seeking a Conditional Use Permit (CUP) under BCC 11.17.070(w) and BCC 11.35.060(c) which allows commercial sand and gravel pits, stone quarries, other mineral extraction, asphalt and/or concrete batching plants in the Growth Management Act Agricultural District and Heavy Industrial District.
2. If granted, this CUP would allow for the continuation of mineral extraction and operation of a commercial gravel mine, to include mining, crushing, washing, processing, stockpiling, sales of material, and concrete and/or asphalt plants.
3. The Applicant is Interstate Concrete C/O Jana McDonald, PO Box 3366 Spokane, WA 99220.
4. The Owners are Farmland Reserve Inc. and AgReserves Inc. C/O Jens Rasmussen, 60 E South Temple Suite 1600, Salt Lake City, UT 84111.
5. The site is located approximately 2.16 miles southwest of the intersection of Plymouth Road and SR 14 in the Plymouth area of unincorporated Benton County, Washington.
6. The subject parcels total approximately 1,206-acres in size and are legally described as a portions of Sections 1, 2, 11, and 12, Township 5 N, Range 27 E, W.M. Parcel Numbers: 101571000002004, 112572012982001, 102571000003000, 111571013428001, and 111571000001003.
7. The property is zoned Growth Management Agricultural District and Heavy Industrial.
8. The proposed mining operation would occur in phases and be situated in an area approximately 220 acres in size currently utilized for industrial and agricultural purposes.
9. The mining operation proposes to extract and process approximately 7 million cubic yards of material using portable and/or stationary equipment over a span of 15-20 years.
10. The hours of operation for the mine and approximately 10-25 employees are expected to range from 6:00am-8:00pm to 24/7 depending on market demands.
11. Blasting will occur as needed, crushing is expected to occur 4-6 months a year, and wash plant will remain on site all year round.
12. Proposed structures for the project are industrial in nature and include the following as well as associated components that are necessary to the operation of the mine: a crusher, drive over scale, concrete batch plant, silos, baghouses, control houses, hot mix asphalt plant and maintenance shop.
13. Public notice and application requirements have been met per BCC 11.50 Variance and Conditional Use.
14. The proposed mining operation is allowable by Conditional Use Permit if approved by the Benton County Hearings Examiner.
15. The proposed mining operation complies with Benton County Building Division standards and requirements.
16. The application for CUP 2026-009 is consistent with the Growth Management Act.
17. The application for CUP 2026-009 is consistent with the goals and policies of the Benton County Comprehensive Plan.

18. The application for CUP 2026-009 is consistent with the requirements of the Benton County Zoning Code.

19. The proposed mining operation is compatible with other uses in the surrounding area and is no more incompatible than any other outright permitted uses in the applicable zoning district.

    a. Subject to potential mitigating measures as determined by the Hearings Examiner.

20. The proposed mining operation will not materially endanger the health, safety, and welfare of the surrounding community to an extent greater than that associated with any other permitted uses in the applicable zoning district.

21. The pedestrian and vehicular traffic caused by the proposed mining operation will not conflict with existing and anticipated traffic in the neighborhood to an extent greater than that associated with any other permitted uses in the applicable zoning district.

22. The proposed mining operation will not adversely affect public services to the surrounding area.

23. The proposed mining operation will not hinder or discourage the development of permitted uses on neighboring properties in the applicable zoning district as a result of the location, size or height of the buildings, structures, walls, or required fences or screening vegetation to a greater extent than other permitted uses in the applicable zoning district.

    a. Subject to potential mitigating measures as determined by the Hearings Examiner.

SUGGESTED CONDITIONS OF APPROVAL

1. The activities on the site shall comply with the submitted site plan and materials submitted for this application, including but not limited to:

    a. Benton County Conditional Use Permit application.

    b. Benton County SEPA Checklist Application.

    c. Critical Habitat Report- Shrubsteppe prepared by Towey Ecological Services dated March 30, 2026, Critical Areas Support Response prepared by Farallon Consulting dated July 30, 2026, and the mitigation recommendations provided by Farallon Consulting dated September 3, 2026.

    d. Reclamation Plan prepared by JUB Engineers, INC. dated January 2026.

2. The applicant shall comply with the requirements of the Mitigated Determination of Non-Significance dated September 03, 2026.

3. The Applicant shall provide written notification of blasting to the Planning Division and the surrounding property owners within 0.50 miles from project boundaries 2 weeks prior to any blasting onsite.

4. Any proposed outdoor lighting associated with this CUP shall be directed downward to avoid unnecessary glare on neighboring parcels.

5. All required development permits shall be obtained and final approvals granted prior to the commencement of occupancy of the mining operation. This includes approval of permits required by the following, as applicable:

a. Benton County Building Division; for building permits.

b. Benton County Fire Marshal; for fire and safety regulations.

c. Benton Franklin Health District.

6. Future construction or activities associated with this conditional use require review under the Benton County Zoning Ordinance. Applicants shall contact the Planning Division prior to any construction or changes in activities on site.

7. The project facility shall follow the rules and regulations of the Benton-Franklin Health District at all times, including standards for drinking water, on-site sewage systems, and BFHD standards.

TIME TO COMPLETE CONDITIONS OF APPROVAL:

The applicant shall have one year to meet all of the Conditions of Approval.

If all conditions of approval have not been met and the Planning Division does not issue the Conditional Use Permit within one (1) year from the time the Hearings Examiner has conditionally approved the Conditional Use Permit, the Hearings Examiner may declare its approval null and void at a regular Hearings Examiner meeting. Prior to doing so, the applicant shall be notified in writing at the applicant's last known address at least twelve (12) days in advance of the upcoming Hearings Examiner meeting.

TRANSFERABILITY

This Conditional Use Permit may be transferable by the holder.

Should the legal landowner of the parcel change at any time during the life of this Conditional Use Permit, the new property owner must provide a written request to the Planning Division for the continuation or termination of the CUP.

Should a new applicant wish to continue operating the CUP, the new applicant must update the Conditional Use Permit application, provide evidence that the processing of beer, wine, or spirits is the primary use of the structure, accept the Conditions of Approval in writing, submit written consent from the legal landowner (if different from applicant) and receive approval by the Planning Division prior to transfer of the permit.

VIOLATIONS OF CONDITIONS OF APPROVAL:

The applicant/owner shall continue to meet all conditions of this Conditional Use Permit while CUP 2026-009 is in effect.

Any violation of the conditions of approval will be processed in accordance with BCC Title 11, Chapter 11.43 Administration and Disposition of Infractions. If the Conditional Use Permit has been issued and violations exist, the Hearings Examiner may revoke the permit after an open record hearing with notice as set forth in BCC 11.50.050(b), as amended. This condition does not foreclose the County's use of other enforcement mechanisms.

EA 2026-008/CUP 2026-009 - Interstate Concrete - Vicinity Map

HEM 1.2



4/10/2026, 4:12:36 PM

1:36,112

0 0.3 0.6 1.2 mi

0 0.5 1 2 km

Vantor

Vantor | Airbus,USGS,NGA,NASA,CGIAR,NCEAS,NLS,OS,NMA,Geodatastyrelsen,GSA,GSI and the GIS User Community | Washington Department of Fish & Wildlife | Chris Clark, Christina Gonzales, Bruce Jones, Ron McFarlance, and Tyson Waldo from NWIFC; Arleta Agun, Brodie Cox, and Andrew Weiss from

Community Development Department
Prosser Office: 620 Market Street, 1st Floor
Kennewick Office: 102206 East Wiser Parkway
www.bentoncountywa.gov

Planning Division
(509) 786-5612
Planning.department@co.benton.wa.us
102206 East Wiser Parkway, Kennewick, WA 99338

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APR 03 2026
Benton County
Planning Division

HEM 1.3

CONDITIONAL USE PERMIT APPLICATION

File No. CUP 2026-009

APPLICANT INFORMATION

Please check the box indicating primary contact person for this application

☒ **Name of Applicant/Agent:** Interstate Concrete & Asphalt dba American Rock Products

Mailing Address (with City, State & zip): PO Box 3366 Spokane, WA 99220

Phone #1: [redacted] Phone #2: [redacted]

Email Address(es): [redacted]

Signature: Jana McDonald Date: 5 Feb 2026

☐ **Name of Property Owner(s)** *(if different)*: AgReserves Inc., Jens Rasmussen

Mailing Address (with City, State & zip): 6716 W Rio Grande, Kennewick, WA 99336

Phone #1: [redacted] Phone #2:

Email Address(es): [redacted]

Signature: Jens Rasmussen **Date:** 3 Feb 2026

Signature: Date:

**If there are additional owners please copy this section, sign, and attach to the application*

If the property is owned by a corporation, trust, partnership or LLC please complete the entity signature block below showing that the person signing has the authority to sign on behalf of the company.

ENTITY SIGNATURE BLOCK

Applicant/Legal Owner name: AgReserves Inc.

Applicant/Legal Owner Contact Information: see above

Officer name: Jens Rasmussen **Title:** Land Manager

Signature: Jens Rasmussen **Date:** 3 Feb 2026

THE ABOVE SIGNED OFFICER OF *(name of entity)* AgReserves Inc. WARRANTS AND REPRESENTS THAT ALL NECESSARY LEGAL AND CORPORATE ACTIONS HAVE BEEN DULY UNDERTAKEN TO PERMIT *(name of applicant)* Interstate Concrete and Asphalt TO SUBMIT THIS APPLICATION AND THAT THE ABOVE SIGNED OFFICER HAS BEEN DULY AUTHORIZED AND INSTRUCTED TO EXECUTE THIS APPLICATION.

Any information submitted to the Benton County Planning Division is subject to public records disclosure law for the State of Washington (RCW Chapter 42.17) and all other applicable law that may require the release of the documents to the public.

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102206 East Wiser Parkway, Kennewick, WA 99338

CONDITIONAL USE PERMIT APPLICATION

File No. _____

APPLICANT INFORMATION

Please check the box indicating primary contact person for this application

☒ **Name of Applicant/Agent:** Interstate Concrete & Asphalt dba American Rock Products

Mailing Address (with City, State & zip): PO Box 3366 Spokane, WA 99220

Phone #1: [redacted] Phone #2: [redacted]

Email Address(es): [redacted]

Signature: Jana McDonald Date: 5 Feb 2026

☐ **Name of Property Owner(s)** *(if different)*: Farmland Reserve, Inc. / Jens Rasmussen

Mailing Address (with City, State & zip): 60 E South Temple Suite 1600, Salt Lake City, UT 84111

Phone #1: [redacted] Phone #2: _____

Email Address(es): [redacted]

Signature: _____ **Date:** 3 Feb 2026

Signature: _____ Date: _____

**If there are additional owners please copy this section, sign, and attach to the application*

If the property is owned by a corporation, trust, partnership or LLC please complete the entity signature block below showing that the person signing has the authority to sign on behalf of the company.

ENTITY SIGNATURE BLOCK

Applicant/Legal Owner name: Farmland Reserve, Inc. by Agreserves, inc. as authorized agent

Applicant/Legal Owner Contact Information: See above

Officer name: Jens Rasmussen **Title:** Land Manager

Signature: _____ **Date:** 3 Feb 2026

THE ABOVE SIGNED OFFICER OF *(name of entity)* Agreserves, Inc. WARRANTS AND REPRESENTS THAT ALL NECESSARY LEGAL AND CORPORATE ACTIONS HAVE BEEN DULY UNDERTAKEN TO PERMIT *(name of applicant)* Interstate Concrete and Asphalt TO SUBMIT THIS APPLICATION AND THAT THE ABOVE SIGNED OFFICER HAS BEEN DULY AUTHORIZED AND INSTRUCTED TO EXECUTE THIS APPLICATION.

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PARCEL INFORMATION

1. **Subject property address (including city):** Undetermined address and 188322 S Plymouth Industrial Road, Plymouth, WA

2. **Parcel number(s):** 112572012982001, 111571013428001, 111571000001003, 102571000003000, 101571000002004

3. **Total Acreage:** ~220 acres

4. **Access:** ☐ County Road ☒ State Road/Highway ☒ Private Road

5. **Utilities:**

Power: ☐ Benton PUD ☒ Benton REA ☐ Other: _____

Sewer: ☒ Septic Tank ☐ City Sewer ☐ Other: _____

Water: ☒ Individual well(s) ☐ One well serving 2-4 lots ☐ One well serving 5+ lots
☐ City System Provider: _____
☐ Private System Provider name and address: _____
PRIVATE SYSTEM: ATTACH APPROVAL DOCUMENATION

Gas: ☐ No ☒ Yes Provider name: Cascade Natural Gas

Irrigation: ☐ No ☐ Yes Provider name: _____

6. **Current use(s) on property:** Grain handling facility, agricultural lab, storage buildings, gravel extraction has occurred.

7. **What are you proposing to do that requires a Conditional Use Permit?** Commercial gravel mining, crushing, washing, processing, stockpiles, sales of material, concrete and asphalt plants. Equipment may be portable or stationary in nature.

For the following proposed uses, please attach the appropriate addendum form:
Business Use, Detached Accessory Dwelling Unit, Child Care Facility (Type B), Bed & Breakfast, Mineral Extraction (Commercial Sand & Gravel), Commercial Kennel, Winery.

8. **Additional comments or information:** _____

If further explanation is needed for any of the questions above, please attach additional pages.

(FOR STAFF USE ONLY) *Access: Y N* *Application Complete: Y N*

Critical Areas: N Y: _____ *Zoning:* _____

Reviewed by: _____ *Date:* _____

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SAND AND GRAVEL PIT, QUARRY AND MINERAL RESOURCES ADDENDUM

FOR CONDITIONAL USE PERMIT APPLICATIONS

1. Surface Mining Permit Number issued by the Department of Natural Resources (if any):

   NA - DNR permit will be sought upon land use approval Date issued: Cannot be issued w/o land use approval

2. Estimate the amount of mineral resources that you plan to extract from the subject property in cubic yards and how long you anticipate this project to last:

   Estimate an additional 7 million cubic yards over 15-20 years. (Previous extraction has occurred on site.)

3. If the site is an active mineral resource area, estimate the amount of mineral resource that existed prior to extraction and provide the amount extracted to date:

   Owner had grading permit for the site to remove and fill material - amount extracted unknown.

4. Describe all existing improvements and uses currently on the subject property:

   The site currently has a grain handling facility, agricultural lab, storage building, gravel extraction and vacant land.

5. Describe existing land uses on properties adjacent to and within 500 feet of the subject property:

   The adjacent properties are held by the same owner and there are storage buildings, agricultural support buildings, gravel extraction and the other surrounding properties are gravel mine, vacant land

Any information submitted to the Benton County Planning Division is subject to public records disclosure law for the State of Washington (RCW Chapter 42.17) and all other applicable law that may require the release of the documents to the public.

Revised 8/2024

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APR 0 3 2026
Benton County
Planning Division

HEM 1.4

INTERSTATE CONCRETE AND ASPHALT
PLYMOUTH QUARRY
BENTON COUNTY, WASHINGTON

JANUARY 2026

RECLAMATION PLAN

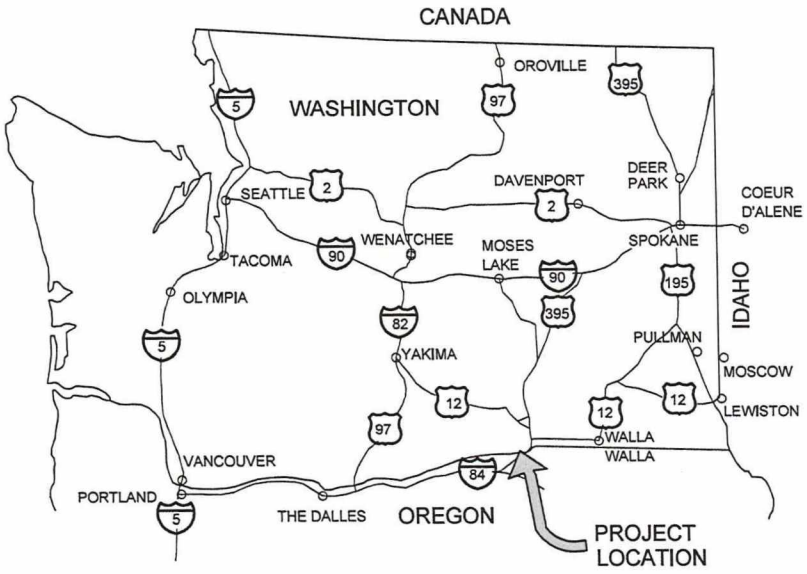
PERMIT NO. _____

PERMIT INFORMATION	
ADDRESS OF PERMIT HOLDER	PO BOX 3366 SPOKANE, WA 99220
PERMIT NO.	

Preliminary maps for land use only.
Subject to final approval from DNR.

SHEET INDEX

1. COVER SHEET
2. EXISTING SITE PLAN
3. MINING PHASING
4. FINAL RECLAMATION SITE PLAN
5. CROSS SECTIONS



LOCATION MAP
NTS



VICINITY MAP
NTS

REUSE OF DRAWINGS
J-U-B SHALL RETAIN ALL COMMON LAW, STATUTORY, COPYRIGHT AND OTHER RESERVED RIGHTS OF THESE DRAWINGS, AND THE SAME SHALL NOT BE REUSED WITHOUT J-U-B'S PRIOR WRITTEN CONSENT. ANY REUSE WITHOUT WRITTEN CONSENT BY J-U-B WILL BE AT CLIENT'S SOLE RISK AND WITHOUT LIABILITY OR LEGAL EXPOSURE TO J-U-B.

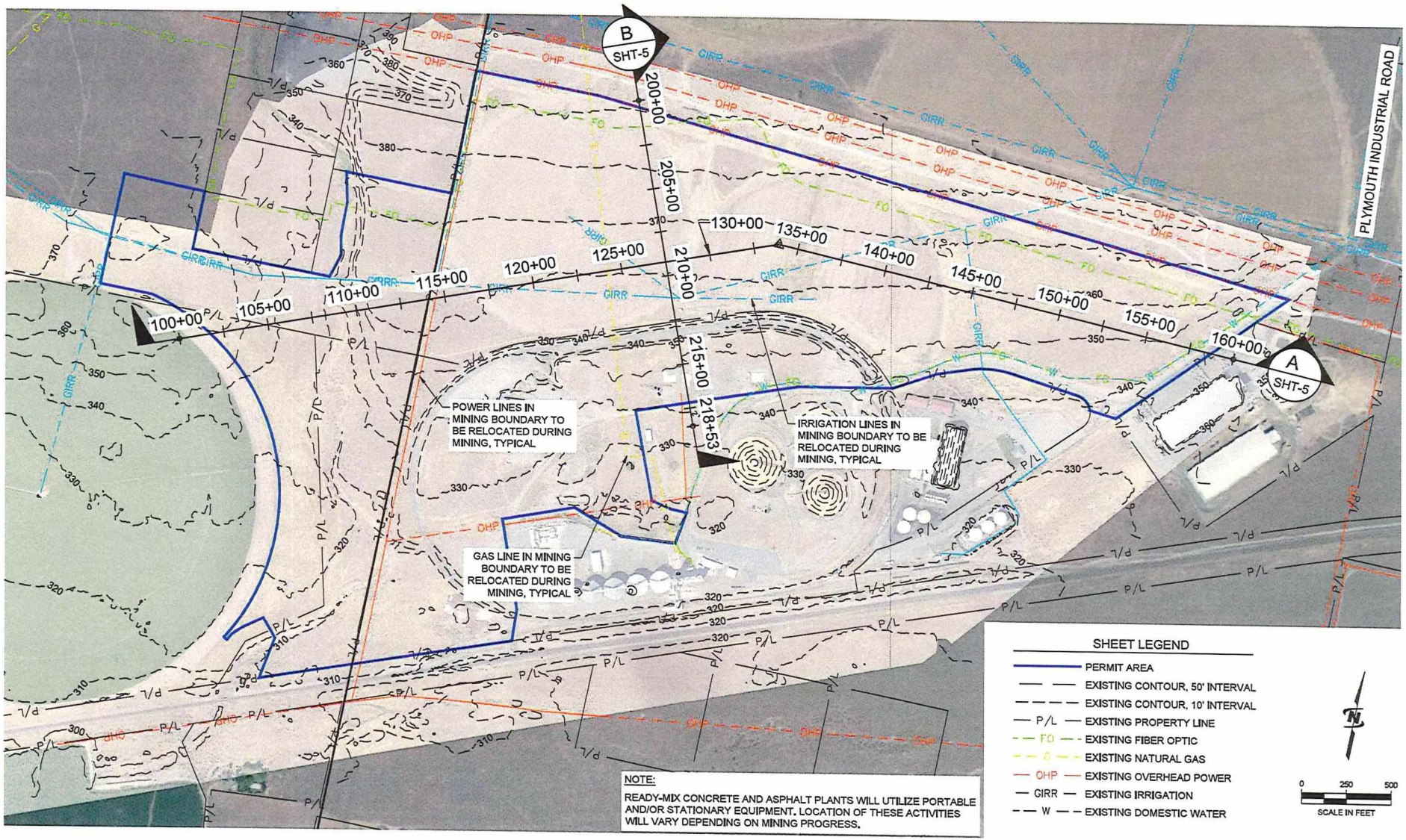
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#2				
#3				

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J-U-B PROJ. #: 167-4560120
PLOT DATE: 1/29/2026
LAST UPDATED: 1/29/2026
DRAWN BY: GRF
DESIGN BY: GRF
CHECKED BY: SS

J-U-B ENGINEERS, INC.

PLYMOUTH QUARRY RECLAMATION PLAN
INTERSTATE CONCRETE AND ASPHALT
COVER SHEET

SHEET 1



REUSE OF DRAWINGS
J-U-B SHALL RETAIN ALL COMMON LAW, STATUTORY, COPYRIGHT AND OTHER RESERVED RIGHTS OF THESE DRAWINGS, AND THE SAME SHALL NOT BE REUSED WITHOUT J-U-B'S PRIOR WRITTEN CONSENT. ANY REUSE WITHOUT WRITTEN CONSENT BY J-U-B WILL BE AT CLIENT'S SOLE RISK AND WITHOUT LIABILITY OR LEGAL EXPOSURE TO J-U-B.

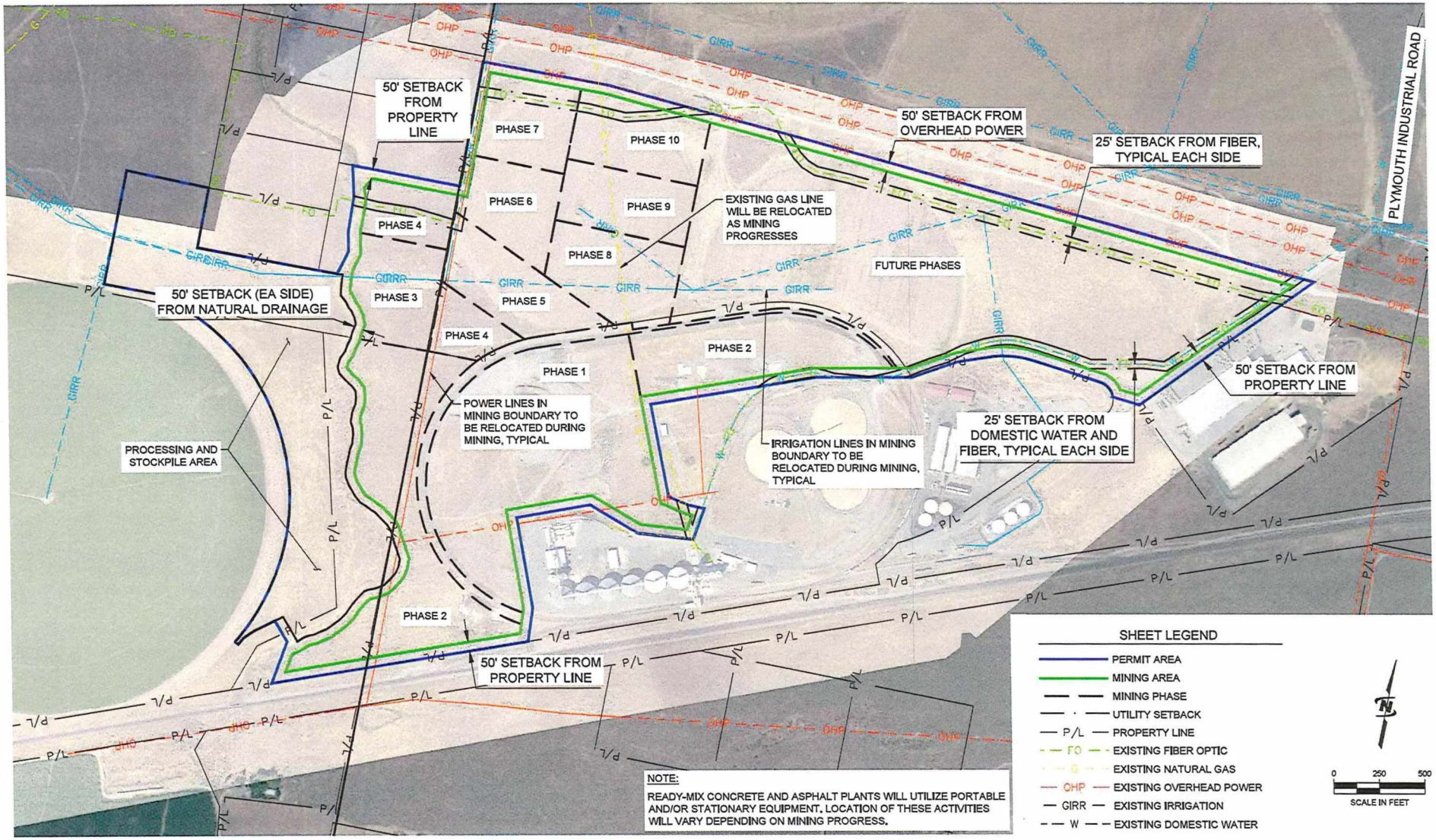
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J-U-B PROJ. #: [illegible]
PLOT DATE: 1/26/2026
LAST UPDATED: 1/26/2026
DRAWN BY: GW
DESIGN BY: GW
CHECKED BY: SS

J-U-B ENGINEERS, INC.

PLYMOUTH QUARRY RECLAMATION PLAN
INTERSTATE CONCRETE AND ASPHALT
EXISTING SITE PLAN

SHEET 2



Mining and reclamation phases subject to change based on market conditions, material quality, and land owner preference

REUSE OF DRAWINGS

JUB SHALL RETAIN ALL COMMON LAW, STATUTORY, COPYRIGHT AND OTHER RESERVED RIGHTS OF THESE DRAWINGS, AND THE SAME SHALL NOT BE REUSED WITHOUT JUB'S PRIOR WRITTEN CONSENT. ANY REUSE WITHOUT WRITTEN CONSENT BY JUB WILL BE AT CLIENT'S SOLE RISK AND WITHOUT LIABILITY OR LEGAL EXPOSURE TO JUB.

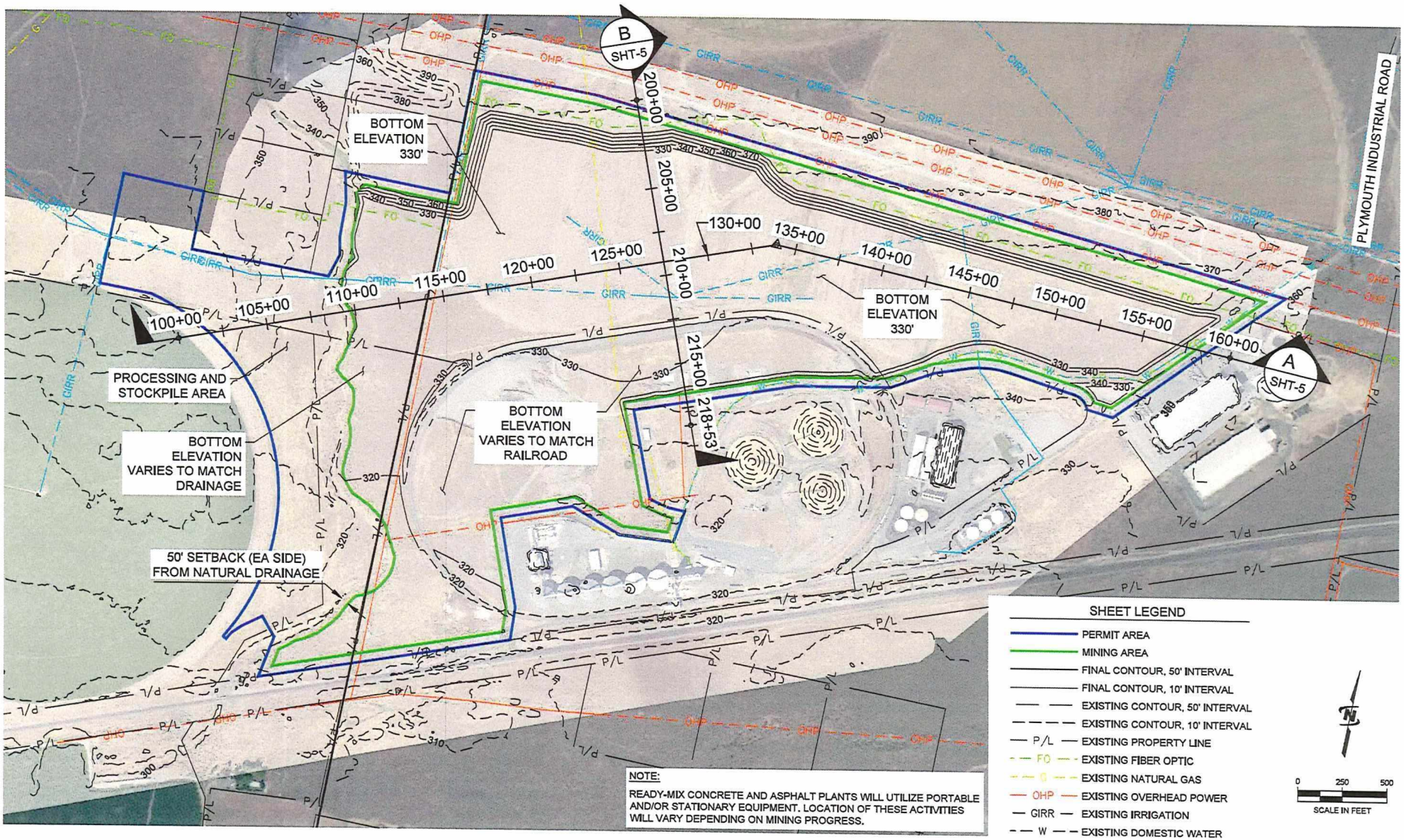
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#2	## ##	##	##	##
#3	## ##	##	##	##

PLOT DATE: 1/9/2026
LAST UPDATED: 1/9/2026
DRAWN BY: GRF
DESIGN BY: GRF
CHECKED BY: SS

J-U-B ENGINEERS, INC.

PLYMOUTH QUARRY RECLAMATION PLAN
INTERSTATE CONCRETE AND ASPHALT
MINING PHASES

SHEET 3



REUSE OF DRAWINGS
J-U-B SHALL RETAIN ALL COMMON LAW, STATUTORY, COPYRIGHT AND OTHER RESERVED RIGHTS OF THESE DRAWINGS, AND THE SAME SHALL NOT BE REUSED WITHOUT J-U-B'S PRIOR WRITTEN CONSENT. ANY REUSE WITHOUT WRITTEN CONSENT BY J-U-B WILL BE AT CLIENT'S SOLE RISK AND WITHOUT LIABILITY OR LEGAL EXPOSURE TO J-U-B.

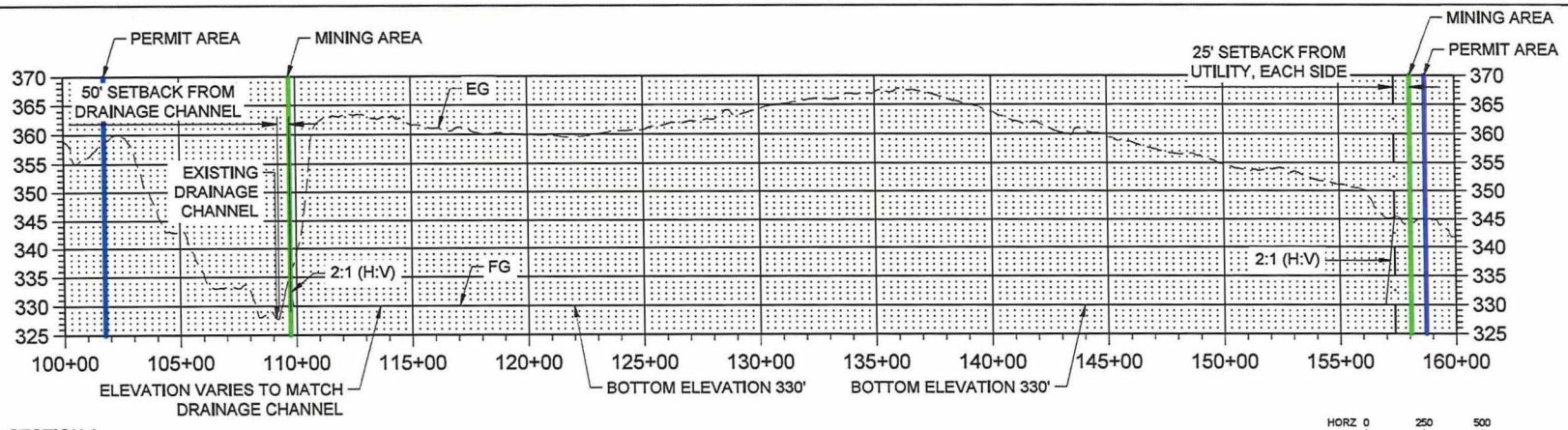
NO.	REVISION DESCRIPTION	BY	APP'D	DATE

FILE: [illegible]
J-U-B PROJ. # [illegible]
PLOT DATE: 1/29/2026
LAST UPDATED: 1/29/2026
DRAWN BY: GW
DESIGN BY: GW
CHECKED BY: SS

J-U-B ENGINEERS, INC.

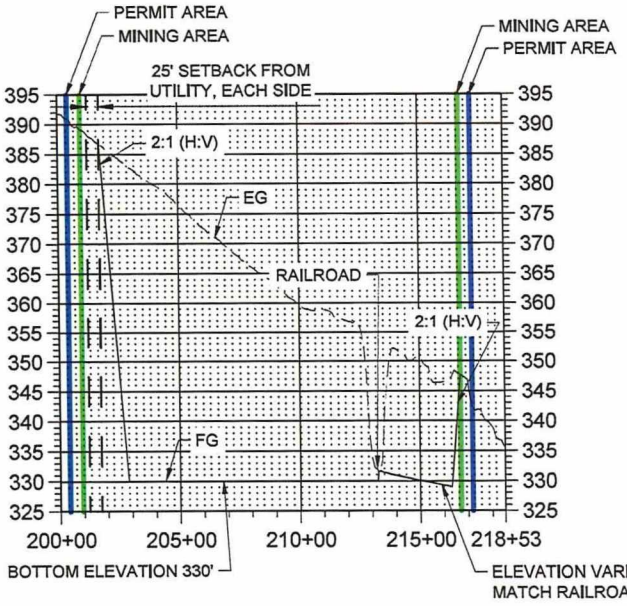
PLYMOUTH QUARRY RECLAMATION PLAN
INTERSTATE CONCRETE AND ASPHALT
FINAL RECLAMATION PLAN

SHEET 4



A SECTION A

HORZ 0 250 500
VERT 0 10 20
SCALE IN FEET



B SECTION B

HORZ 0 250 500
VERT 0 10 20
SCALE IN FEET

REUSE OF DRAWINGS
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NO.	REVISION DESCRIPTION	BY	APR.	DATE
#1		JJ	RT	12
#2		JJ	RT	12
#3		JJ	RT	12

FILE: 20-00120_SHEET.DT
JUB PROJ. #: 20-00120
PLOT DATE: 1/29/2026
LAST UPDATED: 1/29/2026
DRAWN BY: GRF
DESIGN BY: GRF
CHECKED BY: RS

J-U-B ENGINEERS, INC.

PLYMOUTH QUARRY RECLAMATION PLAN
INTERSTATE CONCRETE AND ASPHALT
CROSS SECTIONS

SHEET 5

Community Development Department
102206 East Wiser Parkway
Kennewick, WA 99338

Planning Division
(509) 786-5612
Planning.department@co.benton.wa.us

HEM 1.5

April 10, 2026

Interstate Concrete & Asphalt
C/O Jana McDonald
PO Box 3366
Spokane, WA 99220

Via email: [redacted]

RE: Written Determination of Completeness
File Number(s): CUP 2026-009; EA 2026-008

Dear Ms. McDonald,

This office is in receipt of your project permit application(s) for a Conditional Use Permit and Environmental Checklist for a commercial gravel and mining operation in the Plymouth area of unincorporated Benton County. The Planning Division has determined that the required materials have been submitted and the applications are complete. File numbers have been assigned (CUP 2026-009; EA 2026-008) and the review process will now begin.

During the review and comment period, more clarification or information may be needed from you. If additional information is required, it will need to be submitted to our office before we can make a final determination

If you have any questions regarding this matter, do not hesitate to contact this office.

Sincerely,

Andrea Watts

Andrea Watts - Senior Planner
Benton County Community Development Department
Planning Division

cc: [redacted]

Jill James **HEM 1.6**

From: Planning Department
Sent: Tuesday, April 14, 2026 11:33 AM
To: Brad O'Brien; Troy Taylor; Code Enforcement; 'chiefwatt@bcfd6.com'; Gary Tiplady; Cristina Woods; Shane Elledge; Dylan Krantz; 'erin.hockaday@bfhd.wa.gov'; 'jodeer@bfhd.wa.gov'; 'Deana.chiodo@bfhd.wa.gov'; 'jabrown@bentonrea.org'; 'ccooke@bentonrea.org'; 'john.lyle@bentoncleanair.org'; 'deon.steichen@bentoncleanair.org'; 'tyler.thompson@bentoncleanair.org'; 'alex@futurewise.org'; 'tim@futurewise.org'; 'blm_or_sp_mail@blm.gov'; 'jhoff@usbr.gov'; 'envreview@gmail.com'; 'sepa@dahp.wa.gov'; 'separegister@ecy.wa.gov'; 'r3planning@dfw.wa.gov'; 'sepa.reviewteam@doh.wa.gov'; 'sepacenter@dnr.wa.gov'; 'scplanning@wsdot.wa.gov'; 'enviroreview@yakama.com'; 'ashleymorton@ctuir.org'; 'careymiller@ctuir.org'; 'cgarner@usbr.gov'
Subject: SEPA Consultation for Review - EA 2026-008 and CUP 2026-009 - Interstate Concrete and Asphalt

Good morning,

The Benton County Planning Department has prepared a Notice of Application for consultation in accordance with the State Environmental Policy Act Regulation. This consultation for Project #EA 2026-008 and Conditional Use Permit #CUP 2026-009 is for Interstate Concrete and Asphalt on behalf of American Rock Products, who is proposing a commercial gravel mining, crushing, washing, processing, stockpiling, material sales, concrete and asphalt plant. It is being circulated for review by all agencies with jurisdiction. We appreciate your preliminary review of the proposal and return initial comments no later than ***April 29,2026.*** This proposal will not be acted on before that time.

All necessary documents regarding the proposed project can be found utilizing the link below:

SEPA record number 202601502, "Interstate Concrete and Asphalt Commercial Plant"

Have a wonderful week ahead,

Jill James
Permit Technician
Benton County Community Development Department
Planning Division
Jill.James@co.benton.wa.us
Planning.Department@co.benton.wa.us
(509) 786-5612

Community Development Department
Prosser Office: 620 Market Street, 1st Floor
Kennewick Office: 102206 East Wiser Parkway
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Planning Division
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102206 E Wiser Parkway, Kennewick, WA 99338

HEM 1.7

RECEIVED
APR 03 2026
Benton County Planning Division

SEPA ENVIRONMENTAL CHECKLIST

Application No. EA 2026-008

APPLICANT INFORMATION

Please check the box indicating primary contact person for this application

☒ **Applicant/Agent:** Interstate Concrete and Asphalt dba American Rock Products

Mailing Address: PO Box 3366 City: Spokane

State: WA ZIP: 99220 Phone: [redacted] Work: [redacted]

Email Address: [redacted]

Signature: Jana McDonald Date: 5 Feb 2026

☐ **Property Owner(s)** *(if different)*: Farmland Reserve, Inc. / Jens Rasmussen

Mailing Address: 60 E South Temple, Suite 1600 City: Salt Lake City

State: UT ZIP: 84111 Phone: [redacted] Work:

Email Address: [redacted]

Signature: Jens Rasmussen **Date:** 3 Feb 2026

Signature: Date:

**If there are additional owners please copy this section, sign, and attach to the application*

If the property is owned by a corporation, trust, partnership or LLC please complete the entity signature block below showing that the person signing has the authority to sign on behalf of the company.

ENTITY SIGNATURE BLOCK

Applicant/Legal Owner: Farmland Reserve, Inc. by AgReserves, Inc. as Authorized Agent

Officer name: Jens Rasmussen

Title: Land Manager

Signature: Jens Rasmussen **Date:** 3 Feb 2026

THE ABOVE SIGNED OFFICER OF AgReserves, Inc. *(name of entity)* WARRANTS AND REPRESENTS THAT ALL NECESSARY LEGAL AND CORPORATE ACTIONS HAVE BEEN DULY UNDERTAKEN TO PERMIT Interstate Concrete and Asphalt *(name of applicant)* TO SUBMIT THIS APPLICATION AND THAT THE ABOVE SIGNED OFFICER HAS BEEN DULY AUTHORIZED AND INSTRUCTED TO EXECUTE THIS APPLICATION.

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RECEIVED
APR 0 3 2026
Benton County
Planning Division

SEPA ENVIRONMENTAL CHECKLIST

Application No. _____

APPLICANT INFORMATION

Please check the box indicating primary contact person for this application

☒ **Applicant/Agent:** Interstate Concrete and Asphalt dba American Rock Products

Mailing Address: PO Box 3366 City: Spokane

State: WA ZIP: 99220 Phone: [redacted] Work: [redacted]

Email Address [redacted]

Signature: Jana McDonald Date: 5 Feb 2026

☐ **Property Owner(s)** *(if different)*: AgReserves, Inc., Jens Rasmussen

Mailing Address: 6716 W Rio Grande City: Kennewick

State: WA ZIP: 99336 Phone: [redacted] Work: _____

Email Address: [redacted]

Signature: Jens Rasmussen **Date:** 3 Feb 2026

Signature: _____ Date: _____

**If there are additional owners please copy this section, sign, and attach to the application*

If the property is owned by a corporation, trust, partnership or LLC please complete the entity signature block below showing that the person signing has the authority to sign on behalf of the company.

ENTITY SIGNATURE BLOCK

Applicant/Legal Owner: AgReserves, Inc.

Officer name: Jens Rasmussen

Title: Land Manager

Signature: Jens Rasmussen **Date:** 3 Feb 2026

THE ABOVE SIGNED OFFICER OF AgReserves, Inc. *(name of entity)* WARRANTS AND REPRESENTS THAT ALL NECESSARY LEGAL AND CORPORATE ACTIONS HAVE BEEN DULY UNDERTAKEN TO PERMIT Interstate Concrete and Asphalt *(name of applicant)* TO SUBMIT THIS APPLICATION AND THAT THE ABOVE SIGNED OFFICER HAS BEEN DULY AUTHORIZED AND INSTRUCTED TO EXECUTE THIS APPLICATION.

BACKGROUND

1. Name of proposed project, if applicable: ARP Plymouth Aggregate Reserve Project

2. Parcel Number: 112572012982001, 111571013428001, 111571000001003, 102571000003000, 101571000002004

3. Date checklist prepared: January 2026

4. Agency requesting checklist: Benton County

5. Proposed timing or schedule (including phasing, if applicable): Upon approval of permits

6. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. Potential for expansion in the future that is undetermiend at this time.

7. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal. SEPA Checklist, Cultural Surveys, Grading Permits have previously been done.

8. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain. No

9. List any government approvals or permits that will be needed for your proposal, if known.:

Conditional Use permit, Air permit, Storm water general permit, Department of Natural Resources Reclamation Permit

10. Give a brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page.

The proposal is to continue existing aggregate extraction at the site which will include mining, crushing, washing, stockpiling, sales of materials, concrete and/or asphalt operation. All operations will be done with portable / stationary equipment.

11. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide

a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

Portion of the following parcels: 112572012982001, 111571013428001, 111571000001003, 102571000003000, 101571000002004

See attached map

B. ENVIRONMENTAL ELEMENTS

1. Earth

a. General description of the site (circle one):

☐ Flat ☑ Rolling ☐ Hilly ☐ Steep Slopes ☐ Mountainous

Other : _____

b. What is the steepest slope on the site (approximate percent slope)? .83%

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

Sand, gravel, rock, and large rock. Excavation has already occurred on site.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

No

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

Excavation has already occurred on site and estimate an additional 7 million cubic yards will be excavated from the site.

No fill is anticipated.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

Yes. Once vegetative cover is removed there will be a chance of erosion occurring from wind and water

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)? None related to the mining activities of the project.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

Site and reclamation work will be graded to control sedimentation.

2. Air

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known. Excavation has occurred at the site and emissions will consist of possible fumes from equipment exhaust and fugitive dust. Sources may also include, vehicles, equipment, crusher, asphalt plant, concrete plant, and roads.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. No

c. Proposed measures to reduce or control emissions or other impacts to air, if any: Haul roads will be watered or treated with dust palliative. Asphalt and concrete plants will operate in compliance with air permits, utilize bag houses for dust control, and be properly maintained. Aggregate operations will use water spray bars to control dust as needed.

3. Water

a. Surface Water:

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into. All work for this project will be greater than 200 feet distant from any designated water bodies. Appropriate setbacks will be put in place for any ephemeral drainage streams as needed.

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans. All work for this project will be greater than 200 feet distant from any designated water bodies. Appropriate setbacks will be put in place for any ephemeral drainage streams as needed.

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material. None

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known. No

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

No

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge. No

b. Ground Water:

1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known. Water will be used for washing rock as needed for the ready-mix concrete plant and dust control. Stormwater could be discharged to the ground from the site.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals…; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals

or humans the system(s) are expected to serve. Gravel washing may be conducted at the site which will result in the water being discharged to ground.

c. Water runoff (including stormwater):

1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe. Stormwater from pit floor will be sloped toward pit high walls and retained on site.

2) Could waste materials enter ground or surface waters? If so, generally describe. No

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe. No

4) Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any: Runoff will be contained in the mining area and will be allowed to infiltrate

4. Plants

a. Check the types of vegetation found on the site:

- ____ Deciduous tree *(alder, maple, aspen, other)*
- ____ Evergreen tree *(fir, cedar, pine, other)*
- X Shrubs
- X Grass
- ____ Pasture
- ____ Crop or grain
- ____ Orchards, vineyards or other permanent crops
- ____ Wet soil plants *(cattail, buttercup, bullrush, skunk cabbage, other)*
- ____ Water plants *(water lily, eelgrass, milfoil, other)*
- ____ Other types of vegetation

b. What kind and amount of vegetation will be removed or altered? Grasses and sage brush

c. List threatened and endangered species known to be on or near the site. None

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: Site will be reclaimed in conjunction with AgReserves site plans and reclamation permit.

e. List all noxious weeds and invasive species known to be on or near the site. None

5. Animals

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. Examples include: birds: hawk, heron, eagle, songbirds, other; mammals: deer, bear, elk, beaver, other; fish: bass, salmon, trout, herring, shellfish, other. Mice

b. List any threatened and endangered species known to be on or near the site. Site is within a mapped PHS occurrence for ferruginous hawk, a state-listed species. No individuals or nesting activity have been observed on or near the site.

c. Is the site part of a migration route? If so, explain. No

d. Proposed measures to preserve or enhance wildlife, if any: None

e. List any invasive animal species known to be on or near the site. None

6. Energy and Natural Resources

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc. Electrical power will either be generated on site with a diesel generator or sourced from local grid connection. Natural gas or propane will be needed for asphalt production.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe. No

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any: None

7. Environmental Health

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

There could be potential spills from equipment, fuel, oils, or materials used for production in asphalt and/or concrete. While blasting is not anticipated, explosives may be used for basalt ridges.

1) Describe any known or possible contamination at the site from present or past uses. None

2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity. None

3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

Fuel, Asphalt oil, concrete admixtures, cement, motor and hydraulic oil may be stored on site.

4) Describe special emergency services that might be required.

None

5) Proposed measures to reduce or control environmental health hazards, if any:

All work will be conducted within the requirements of applicable permits, rules and regulations.

b. Noise

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? None

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site. There will be noise from heavy equipment operation, rock crushing, truck traffic, concrete and asphalt production. Operations could occur 24 hours per day 7 days a week dependent on market demands. Operations would occur year round and typically between the hours of 6AM and 8PM

3) Proposed measures to reduce or control noise impacts, if any: None

8. Land and Shoreline Use

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

The current use of the property is industrial and gravel extraction has occurred on the site. The surrounding properties are industrial and agricultural. This will not affect adjacent properties.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land 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?
No

1) 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? If so, how: No

c. Describe any structures on the site. Multiple structures on site associated with the property owner's operations. Including grain silos, storage sheds, agricultural labs, etc.

d. Will any structures be demolished? If so, what? Not as a part of this request

e. What is the current zoning classification of the site? Heavy Industrial and GMA AG

f. What is the current comprehensive plan designation of the site? Heavy Industrial and GMA AG

g. If applicable, what is the current shoreline master program designation of the site? N/A

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.
No

i. Approximately how many people would reside or work in the completed project? 10 to 25 depending on site activities.

j. Approximately how many people would the completed project displace? None

k. Proposed measures to avoid or reduce displacement impacts, if any: N/A

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: All activities will comply with appropriate permits.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any: None

9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low income housing. None

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low income housing. None

c. Proposed measures to reduce or control housing impacts, if any: None

10. Aesthetics

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed? Proposed structures will not be taller then 60 feet

b. What views in the immediate vicinity would be altered or obstructed? N/A

c. Proposed measures to reduce or control aesthetic impacts, if any: None

11. Light and Glare

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

Lights may be used for night time operations.

b. Could light or glare from the finished project be a safety hazard or interfere with views? No

c. What existing off-site sources of light or glare may affect your proposal? None

d. Proposed measures to reduce or control light and glare impacts, if any: None

12. Recreation

a. What designated and informal recreational opportunities are in the immediate vicinity?
None

b. Would the proposed project displace any existing recreational uses? If so, describe.
None

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:
None

13. Historic and cultural preservation

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers ? If so, specifically describe.

None

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

Several archaeological studies and cultural assessments have been done on the area by a third party consultant.

c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

Several archaeological studies and cultural assessments have been done on the area by a third party consultant.

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

Any sites found will be properly identified with a buffer. If anything is discovered during the mining process, then process will be stopped and appropriate agencies will be notified.

14. Transportation

a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

Highway 14 to Plymouth Industrial Road

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

The site is not served by public transit. Unknown distance to nearest public transit stop.

c. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

No

d. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe. The project is inside of a privately owned rail spur serving BNSF railroad

e. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

It is estimated that the site will progressively grow to generate approximately 300-400 truck trips per day during PEAK operation.

f. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

No

g. Proposed measures to reduce or control transportation impacts, if any: None

15. Public Services

a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

No

b. Proposed measures to reduce or control direct impacts on public services, if any.

No

16. Utilities

a. Circle utilities currently available at the site:

☑ electricity ☑ natural ☑ gas water ☑ refuse service
☐ telephone ☑ sanitary sewer system ☐ other :

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

None

C. SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Applicant

Signature: Jana McDonald

Name of Signee Jana McDonald

Position and Agency/Organization Dir. Resources + Environmental / Interstate Concrete + Asphalt

Date Submitted: 5 Feb 2026

Legal Owner (if ~~different than~~ applicant)

Signature:

Name of Signee Jens Rasmussen

Position and Agency/Organization Land Manager, Agreserves, Inc.

Date Submitted: 3 Feb 2026

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

None

C. SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Applicant

Signature: Jana McDonald

Name of Signee: Jana McDonald

Position and Agency/Organization: ~~Dir. Resources + Environmental~~ / Interstate Concrete + Asphalt

Date Submitted: 5 Feb 2026

Legal Owner (if different than applicant)

Signature:

Name of Signee: Jens Rasmussen

Position and Agency/Organization: Land Manager/Farmland Reserve, Inc.

Date Submitted: 3 Feb 2026

D. SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS

(**IT IS NOT REQUIRED** to use this sheet for project actions)

- Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.
- When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

_____

_____

a. Proposed measures to avoid or reduce such increases are: _____

_____

_____

2. How would the proposal be likely to affect plants, animals, fish, or marine life? _____

_____

_____

a. Proposed measures to protect or conserve plants, animals, fish, or marine life are:

_____

_____

3. How would the proposal be likely to deplete energy or natural resources?

_____

_____

a. Proposed measures to protect or conserve energy and natural resources are: _____

_____

_____

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

_____

_____

a. proposed measures to protect such resources or to avoid or reduce impacts are: _____

_____

_____

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

_____

_____

a. Proposed measures to avoid or reduce shoreline and land use impacts are: _____

_____

_____

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

_____

a. Proposed measures to reduce or respond to such demand(s) are: _____

_____

_____

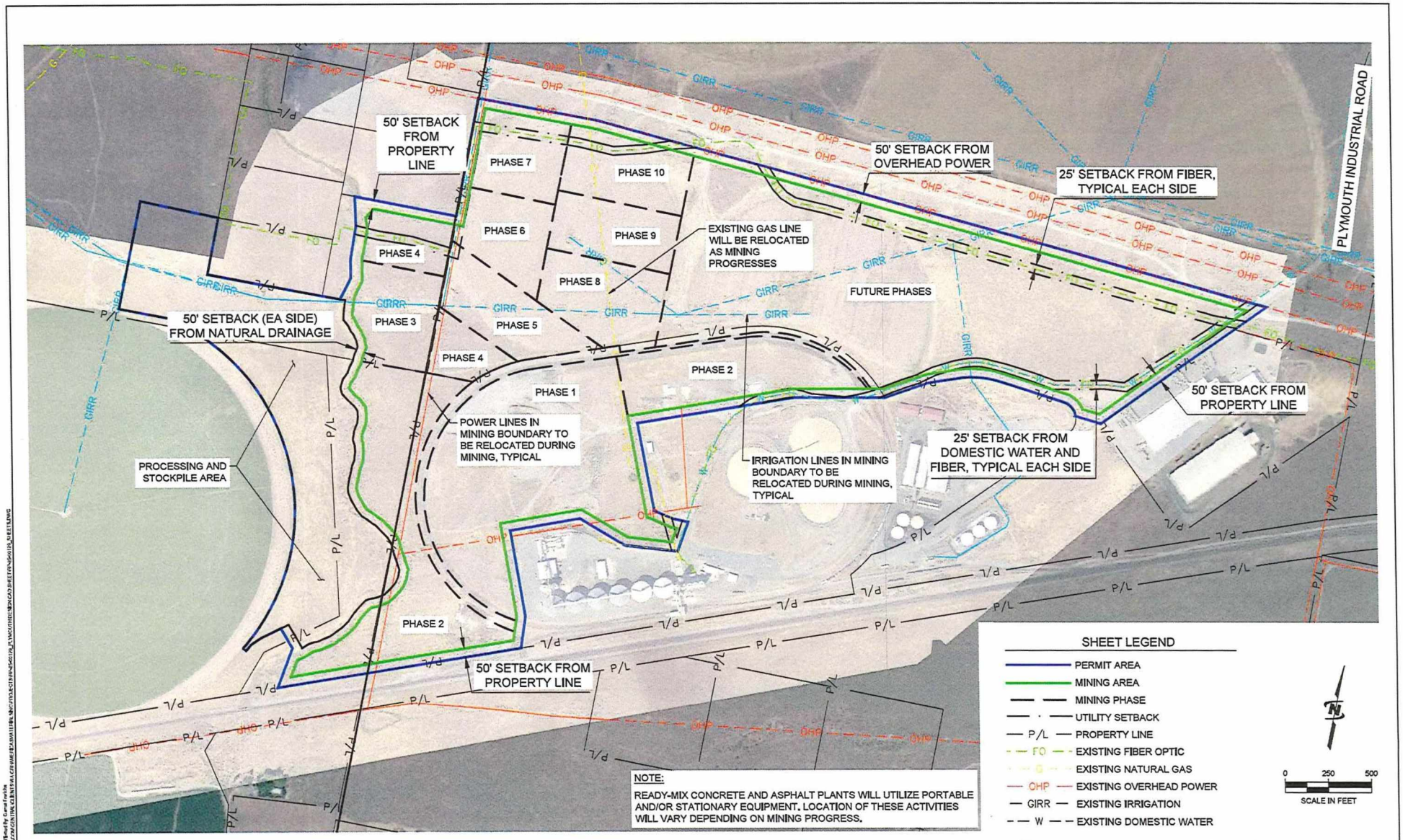
7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

_____

_____

_____

HEM 1.8



Mining and reclamation phases subject to change based on market conditions, material quality, and land owner preference

REUSE OF DRAWINGS
J-U-B SHALL RETAIN ALL COMMON LAW, STATUTORY, COPYRIGHT AND OTHER RESERVED RIGHTS OF THESE DRAWINGS, AND THE SAME SHALL NOT BE REUSED WITHOUT J-U-B'S PRIOR WRITTEN CONSENT. ANY REUSE WITHOUT WRITTEN CONSENT BY J-U-B WILL BE AT CLIENT'S SOLE RISK AND WITHOUT LIABILITY OR LEGAL EXPOSURE TO J-U-B.

NO.	REVISION DESCRIPTION	BY	APR.	DATE
##	##	##	##	##
##	##	##	##	##
##	##	##	##	##

J-U-B ENGINEERS, INC.

PLYMOUTH QUARRY RECLAMATION PLAN
INTERSTATE CONCRETE AND ASPHALT
MINING PHASES

SHEET 3

HEM 1.9

RECEIVED
APR 03 2026
Benton County
Planning Division

3/30/2026

Critical Habitat Report- Shrubsteppe

Interstate Concrete and Asphalt Plymouth AgReserves Project

Prepared for:
Interstate Concrete and Asphalt

Prepared by:
Von R. Pope

Towey Ecological Services
24211 S. Harmony Rd.
Cheney, WA 99004
509-939-5203

Project Description

This report is a supplement to the SEPA Application submitted for the Interstate Concrete and Asphalt Plymouth AgReserves Proposed Project (Project). Please refer to that application for the Project Description.

Purpose

Per Benton County Code 15.02.080, this report provides an overview of critical fish and wildlife conservation areas upland habitats within the Project area using existing information to identify known or likely critical habitats. It also includes a summary of a field visit that provides a qualitative assessment of the existing habitat conditions.

Methods

Several online databases were reviewed to document known or presumed existing critical upland habitats within and directly adjacent to the Project, including; the Washington Department of Fish and Wildlife (WDFW) Priority Habitats and Species (PHS) database (WDFW 2026), the Washington Department of Natural Resources (DNR) Rare Plant and Ecosystem database (DNR 2026), and the WDFW Washington Shrubsteppe Restoration and Resiliency Initiative (WSRRI) database (TerrAdapt 2026). Benton County Zoning maps were also reviewed to determine zoning for the Project (Benton County 2026).

Towey Ecological Services conducted a field visit to assess current habitat conditions following a desktop analysis. A biologist surveyed the site by foot, documenting present habitat and taking photographs and recording a list of identifiable plants species. Google Earth Imagery (2026) was used to review historical habitat within the Project area.

Results

Desktop Review

The WDFW database (WDFW 2026) identifies many polygons of shrubsteppe habitat throughout the Project Area (Figure 1). No rare plants or ecosystems were identified from the DNR database (DNR 2026). The WSRRI database (TerrAdapt 2026) includes mapped WSRRI Xeric Habitat (Other Xeric Habitats) along the west side of the Project (Figure 2). Google Earth Imagery (Google Earth 2026) reveals the agricultural activity occurred on the northeast portion of the Project up to 2018 (Figure 3). The former ag field is now fallow.

Benton County Zoning for the Project area (Figure 4) is classified as either Heavy Industrial or Agriculture (Benton County 2026).

For discission purposes, the Project area is divided into three zones (Figure 5). including the current and abandoned ag fields (Zone 1), the current industrial area inside the railroad loop (Zone 2), and the Fourmile Canyon area (Zone 3), west of Zones 1 and 2.

Field Visit Observations

On March 3, 2026, the Project area was visited to provide a qualitative assessment of current habitat conditions. Overall, the landscape within the Project area has experienced significant fragmentation and disturbance, primarily due to longstanding utility, agricultural, and industrial activities. Various infrastructure elements contribute to this altered condition, including overhead transmission lines, powerlines, gas pipelines, fiber optic lines, and railroad tracks, along with their necessary access routes and associated developments. These features have collectively influenced the current habitat structure and composition across the Project area.

Table 1 shows a list of identifiable plant species. The plant species list is likely a minimum sample of species present as the survey was completed in late winter. Skeletons from the previous growing season were used to classify many of the species listed. Plant species are listed by common name, species, and origin (native or nonnative).

Table 1. List of identifiable plant species observed during March 3, 2026, field visit with

Common Name	Species	Origin
Big sagebrush	*Atemisia tridentata*	Native
Western yarrow	*Achillea mllefolium*	Native
Gray rabbitbrush	*Ericameria nauseosa*	Native
Spring whitlow grass	*Draba verna*	Native
Spring gold	*Crocidium multicaule*	Native
Bunchgrass	*Psuedoreogneria spicata*	Native
Cereal rye	*Secale cereale*	Nonnative
Cheatgrass	*Bromus tectorum*	Nonnative
Diffuse knapweed	*Centaurea diffusa*	Nonnative
Russian thistle	*Salsola kali*	Nonnative
Tumble mustard	*Sisymbrium alltissimum*	Nonnative
Redstem storksbill	*Erodium cicutarium*	Nonnative
Rush skeleton weed	*Chondrilla juncea*	Nonnative
Prickly lettuce	*Lactuca serriola*	Nonnative

Habitat by Zone

For discussion, the Project was divided into three zones. A qualitative summary with supporting photographs is provided below.

Zone 1 – Ag Fields

The site visit revealed current and historic agricultural activity in Zone 1, (zoned for agricultural use in Benton County). This area has been converted from native shrubsteppe to active crops and annual grasslands, including the habitat immediately adjacent to the active ag fields. Photos 1-4 show existing habitat around the active ag fields, classified as potential shrubsteppe habitat in the WDFW PHS database.

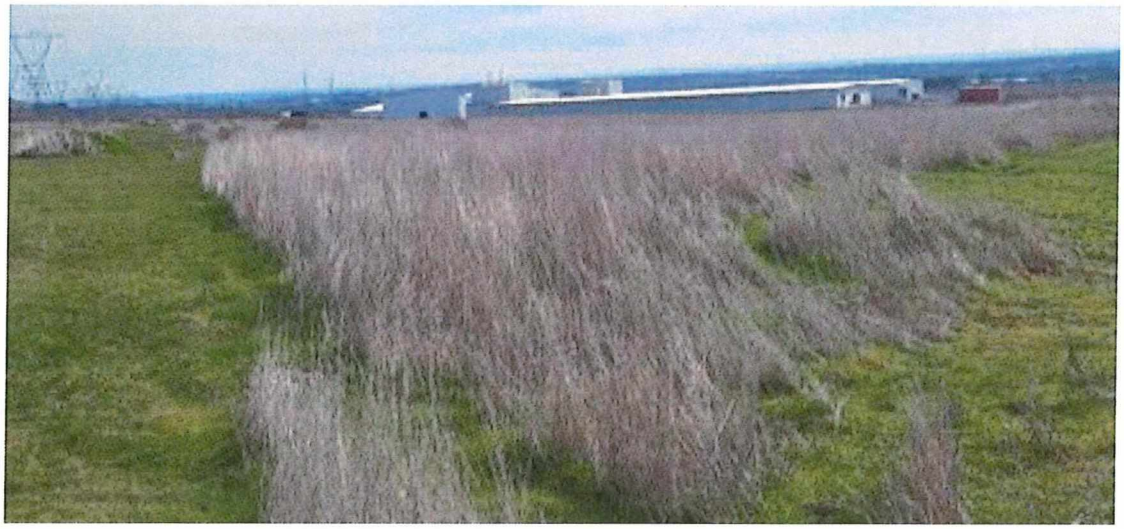


Photo 1. Taken from northeast side of the active eastern ag field looking southwest.



Photo 2. Taken from northeast side of the active eastern ag field looking west.



Photo 3. Taken from northwest corner of the Project, looking east.



Photo 4. Taken from the south of the active ag fields looking north.

To the east of the active ag fields is an abandoned ag field (Figure 3). While this habitat contains an occasional sagebrush (*Artemisia tridentata*) or gray rabbitbrush (*Ericameria nauseosa*), this former ag field is dominated by annual grasses, including cheatgrass (*Bromus tectorum*) and cereal rye (*Secale cereale*) and nonnative forbs like diffuse knapweed (*Centaurea diffusa*) and Russian thistle (*Salsola kali*). Photos 4 and 5 show the current condition of this recently abandoned ag field and adjacent habitat.



Photo 5. Taken from southeast corner of abandoned ag field looking west.



Photo 6. Taken from southeast side of abandoned ag field looking northeast. Plymouth industrial road is on right side of the photo.

Zone 2 - Industrial

Zone 2 within the Project area is also highly fragmented due to longstanding industrial activity in this area. Zone 2 is designated for Heavy Industrial uses in Benton County. The

WDFW PHS data depicts much of this habitat as shrubsteppe habitat (Figure 1). However, this habitat is also dominated by annual nonnative plant species, including cereal rye, cheatgrass, diffuse knapweed, and tumble mustard (*Sisymbrium alltissimum*). There are numerous spoils piles throughout this habitat. Photos 7 and 8 show the current habitat conditions in Zone 2.



Photo 7. Taken north of the grain elevators looking southwest.



Photo 8. Taken from the west apex of the railroad loop, looking east.

Zone 3 -Fourmile Canyon

Zone 3 contains the Fourmile Canyon drainage and has a mosaic of habitat types, ranging from highly degraded to remnant shrubsteppe habitat. The majority of the habitat in Zone 3

of the Project is classified as shrubsteppe habitat in the WDFW PHS Database (Figure 1). In addition, the WSSRI database has portions of the Fourmile Canyon Area mapped as "Other Xeric Habitats" (Figure 2). According to the WSRRI strategy document, Other Xeric Habitats are more degraded than the desired Core, Growth Opportunity, and Corridor upland habitats with higher conservation values, but are still important to retain if resources allow (WDFW (2024). Benton County Zoning for Zone3 is agricultural uses, except for the most eastern portion adjacent to the railroad loop in the northwest corner of Section 12, which is zoned for Heavy Industrial.

Remnant shrubsteppe habitat in Zone 3 is most prevalent on the relatively steep slopes east of Fourmile Canyon Creek. Photos 9-12 provide examples of the habitat in Zone3. Zone 3 was the only Zone in the Project area where bluebunch wheatgrass (*Psuedoroegneria spicata*) was observed.



Photo 9. Taken from the northeast corner of Zone 3 (SE corner of Section 2, T5N, R27E), looking southwest.



Photo 10. Taken from the NW corner of Zone 3 east of Fourmile Canyon Creek, looking south.



Photo 11. Taken from the west-central portion of the project, east of Fourmile Canyon looking south southeast.



Photo 12. Taken from southwest corner of Project looking northwest.

Discussion

Although the WDFW PHS database (WDFW 2026) indicates shrubsteppe habitat in the Project area, the site visit revealed that most upland habitats have been converted to annual grassland/forbland communities dominated by nonnative species due to industrial and agricultural activity. While the timing of the site visit was late winter, most of the habitat in the Project area has been previously disturbed, leaving little undisturbed habitat. Therefore, shrubsteppe remnant habitat is scarce, especially in Zones 1 and 2.

Per Benton County Code (15.02.180) the site inspection likely results in one or two categories (or both), 1) No Critical Area Present, or 2) Critical Area present but, with a No Impact-Waiver. The No Critical Area Present category is particularly true for Zones 1 and 2, since no remnant shrubsteppe habitat was observed on these highly disturbed sites that are zoned for agricultural and heavy industrial used in Benton County.

While the upland habitat in Zone 3 is mapped as shrubsteppe habitat (WDFW 2026) and classified as Other Xeric Habitat (WSRRI 2026) for conservation in the WSRRI database, it too is dominated by nonnative plant species. The remnant shrubsteppe habitat in Zone 3 is limited to the relatively steep slopes on the east side of Fourmile Canyon Creek were blue bunch wheatgrass was observed. These slopes have not been directly affected by industrial and agricultural activity due to the steep topography. However, even these remnant shrubsteppe slopes have been indirectly affected by developments in the

immediate and are dominated by nonnative plants, like cereal rye. Impacts to remnant shrubsteppe habitat in Zone 3 would likely be limited to indirect impacts from the Project, since active mining is not planned for the habitats west of the Fourmile Creek Canyon. Indirect impacts from processing and stockpiling west of Fourmile Creek is not likely to impact the habitat any more than the current agricultural and industrial activities in this area.

Due to ongoing industrial and agricultural activities around the Project area, including a gravel pit to the north, agricultural fields, industry, and a railroad—the shift from native shrubsteppe to nonnative annual species is expected. While remnants of shrubsteppe still exist in Zone 3, this already reduced habitat is constantly affected by the surrounding land uses.

Recommendations

For Zones 1 and 2, no critical fish and wildlife habitat was confirmed. For Zone 3 there is remnant shrubsteppe habitat on the steep slopes east of Fourmile creek, However, those slopes are not designated for active mining, so a Critical Area Present, but No Impact-waiver determination would not require any mitigation. Therefore, no mitigation is proposed for shrubsteppe habitat in the Project area.

Qualifications

This report was prepared by Von R. Pope, a wildlife biologist with Towey Ecological Services. Von has a Bachelor of Science Degree in Zoology from the University of Idaho (1989) and a Master of Science Degree in Biology from Boise State University (2004). Von has 34 years of professional experience working with wildlife and habitat projects on federally licensed hydroelectric projects along the Columbia and Snake Rivers. Relevant experience includes habitat monitoring and management for upland and riparian habitat projects and for Threatened, Endangered, and Sensitive wildlife, plants, and ecosystems in the intermountain northwest.

Contacts:

Towey Ecological Servies
Von R. Pope
[redacted]

Interstate Concrete and Asphalt, dba American Rock Products
Jana McDonald
[redacted]

Citations

Benton County, GIS. March 17, 2026, https://bentonco.maps.arcgis.com/apps/webmappviewer

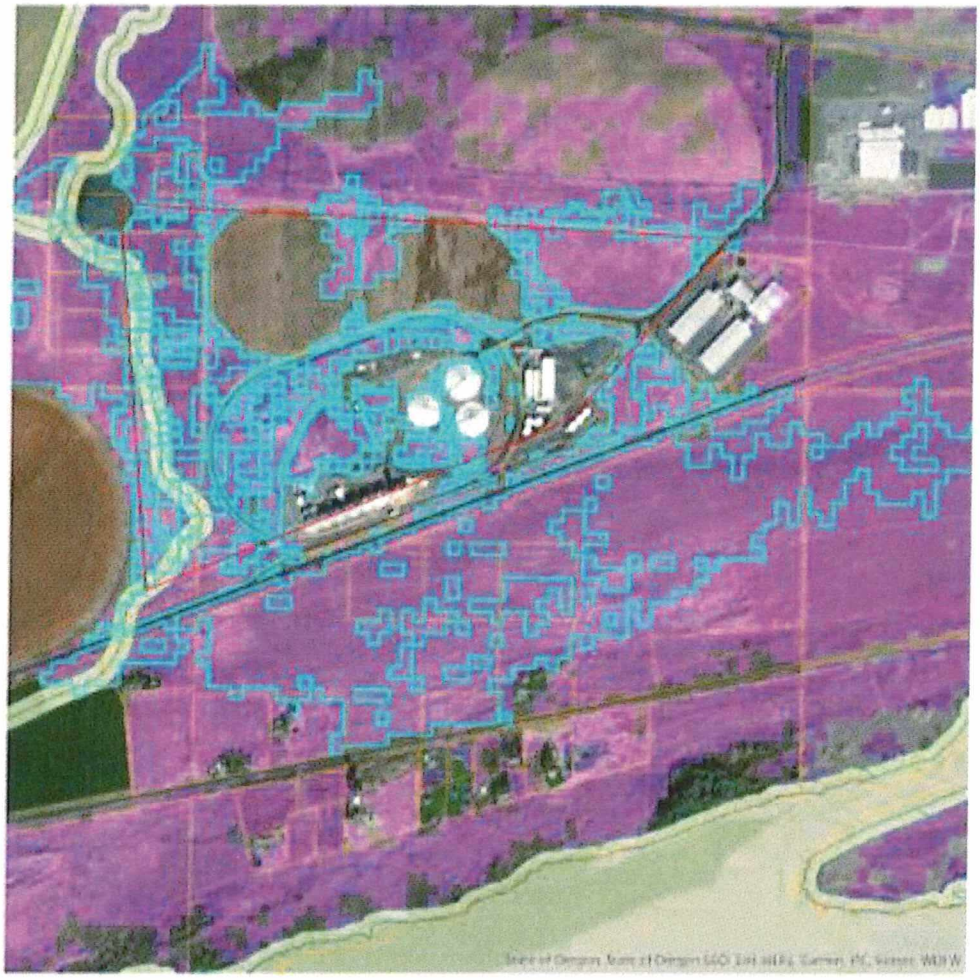
TerrAdapt 2026. March 2, 2026, https://www.terradapt.org/regions/wsrri

Washington Department of Natural Resources (DNR) WNHP Data Explorer. March2, 2026, https://experience.arcgis.com/experience/174566100f2a47bebe56db3f0f78b5d9/page/Rare-Plant-and-Ecosystem-Locations/

Washington Department of Fish and Wildlife (WDFW Priority Habitats and Species (PHS) March 1, 2026, https://geodataservices.wdfw.wa.gov/hp/phs/ accessed

Washington Shrubsteppe Restoration and Resiliency Initiative (WSRRI), Long-Term Strategy 2024-2054. 2024. Washington Department of Wildlife (WDFW), Washington State Department of Natural Resources (DNR), and Washington State Conservation Commission.

Priority Habitats and Species on the Web



Report Date: 03/02/2026

PHS Species/Habitats Overview:

Occurence Name	Federal Status	State Status	Sensitive Location
Shrubsteppe	N/A	N/A	No
Ferruginous Hawk	N/A	Endangered	No

Riparian Management Zones, if present, are not included in the Overview table above or the Details below. For RMZ details, please visit

Figure 1. Mapped shrubsteppe habitat (WDFW PHS 2026) for approximated project area.



Figure 2. WSRRI mapped Xeric Priority Habitat (TerrAdapt 2026) on the west portion of the Project area and to the south.

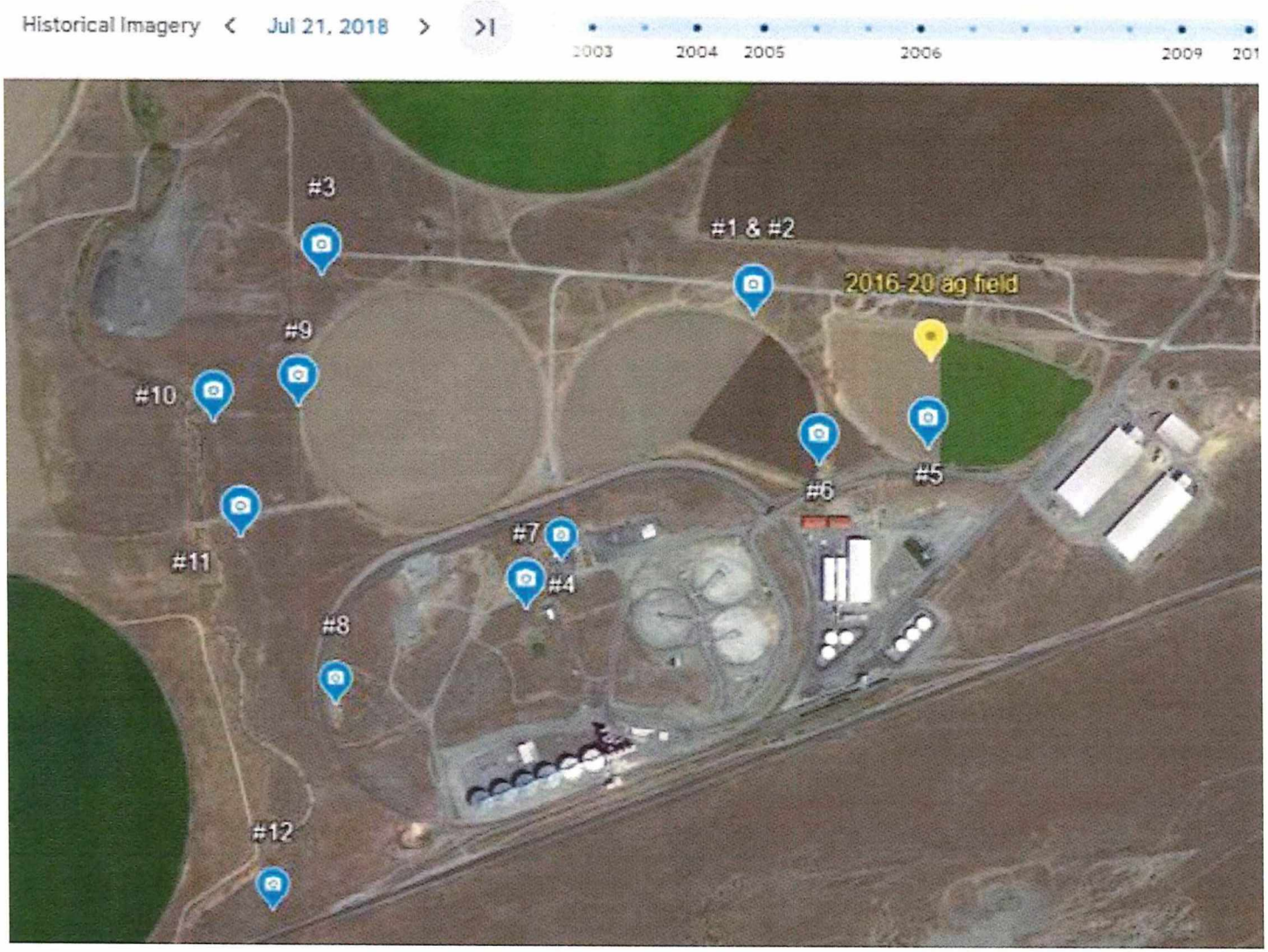


Figure 3. July 2018 Google Earth Imagery (Google Earth 2026), showing historically active ag field on the east side of the Project and the reference locations for referenced digital photos.

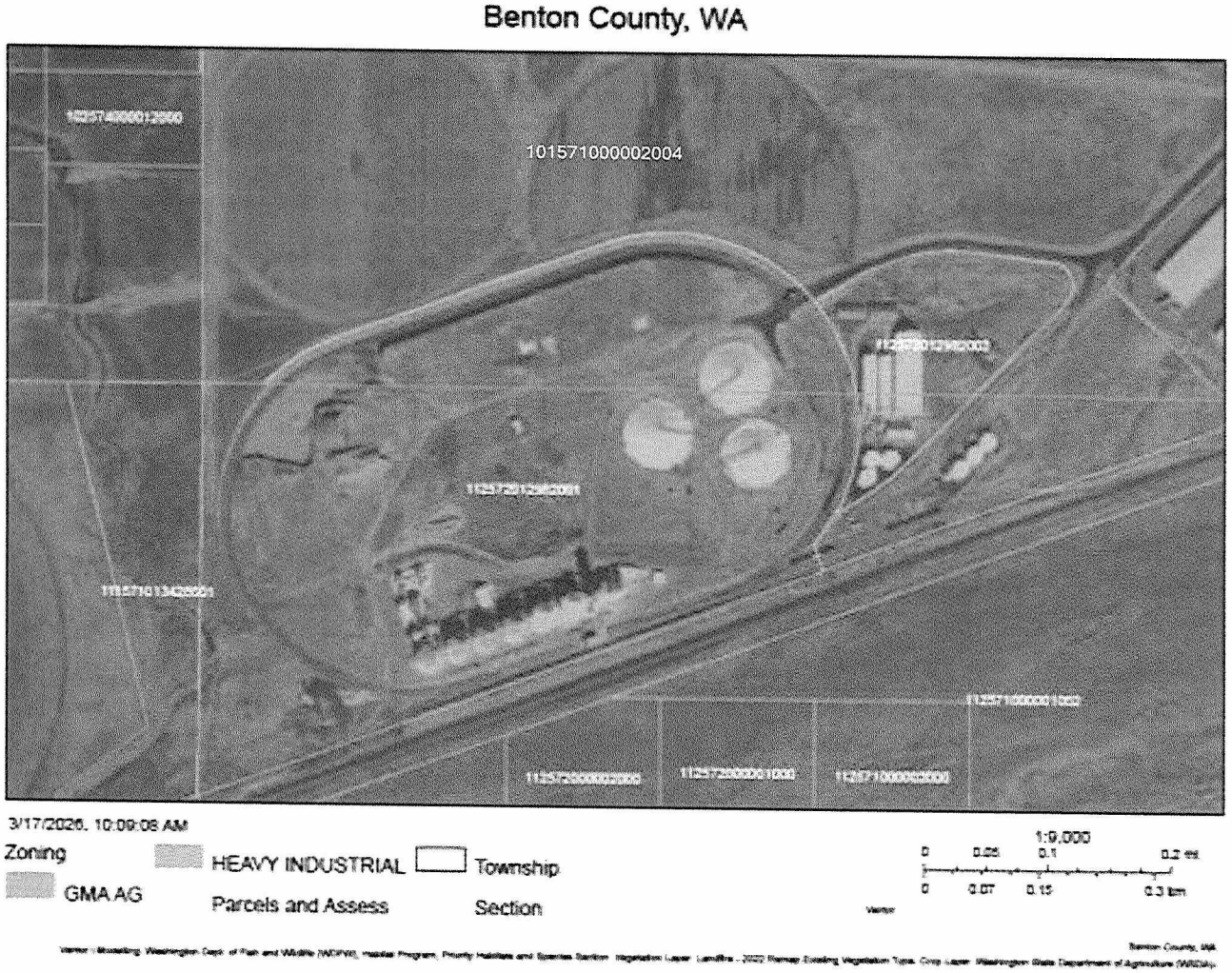


Figure 4. Benton County, Washington, Zoning map (Benton County 2026).

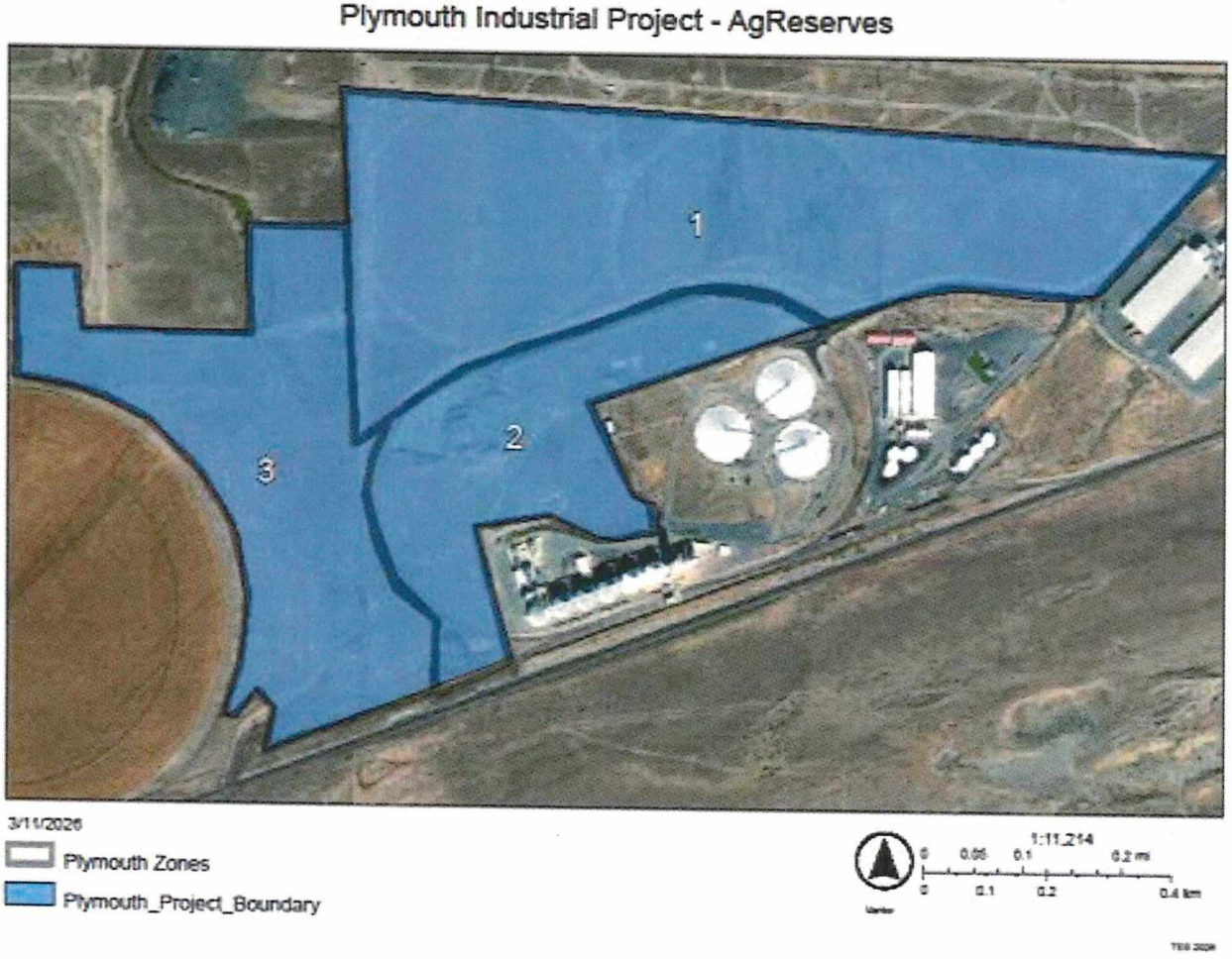


Figure 5. Approximate project area by zone.

Jill James **HEM 1.10**

From: John Lyle <john.lyle@bentoncleanair.org>
Sent: Tuesday, April 14, 2026 1:05 PM
To: Planning Department
Subject: [EXTERNAL] RE: SEPA Consultation for Review - EA 2026-008 and CUP 2026-009 - Interstate Concrete and Asphalt
Attachments: Interstate Concrete and Asphalt Plant SEPA 201601502 Comment.pdf

Hello,

Attached is BCAA's comment on the proposal.

Thanks,

John Lyle
Air Quality Specialist

Benton Clean Air Agency
526 S. Steptoe St.
Kennewick, WA 99336
509-783-1304 ext. 103
www.bentoncleanair.org

From: Planning Department <Planning.Department@co.benton.wa.us>
Sent: Tuesday, April 14, 2026 11:33 AM
To: Brad O'Brien <Brad.Obrien@co.benton.wa.us>; Troy Taylor <Troy.Taylor@co.benton.wa.us>; Code Enforcement <code.enforcement@co.benton.wa.us>; chiefwatt@bcfd6.com; Gary Tiplady <Gary.Tiplady@co.benton.wa.us>; Cristina Woods <Cristina.Woods@co.benton.wa.us>; Shane Elledge <Richard.Elledge@co.benton.wa.us>; Dylan Krantz <Dylan.Krantz@co.benton.wa.us>; erin.hockaday@bfhd.wa.gov; jodeer@bfhd.wa.gov; Deana.chiodo@bfhd.wa.gov; jabrown@bentonrea.org; ccooke@bentonrea.org; John Lyle <john.lyle@bentoncleanair.org>; Deon Steichen <deon.steichen@bentoncleanair.org>; Tyler Thompson <tyler.thompson@bentoncleanair.org>; alex@futurewise.org; tim@futurewise.org; blm_or_sp_mail@blm.gov; jhoff@usbr.gov; envreview@gmail.com; sepa@dahp.wa.gov; separegister@ecy.wa.gov; r3planning@dfw.wa.gov; sepa.reviewteam@doh.wa.gov; sepacenter@dnr.wa.gov; scplanning@wsdot.wa.gov; enviroreview@yakama.com; ashleymorton@ctuir.org; careymiller@ctuir.org; cgarner@usbr.gov
Subject: SEPA Consultation for Review - EA 2026-008 and CUP 2026-009 - Interstate Concrete and Asphalt

Good morning,

The Benton County Planning Department has prepared a Notice of Application for consultation in accordance with the State Environmental Policy Act Regulation. This consultation for Project #EA 2026-008 and Conditional Use Permit #CUP 2026-009 is for Interstate Concrete and Asphalt on behalf of American Rock Products, who is proposing a commercial gravel mining, crushing, washing, processing, stockpiling, material sales, concrete and asphalt plant. It is being circulated for review by all agencies with jurisdiction. We appreciate your preliminary review of the proposal and return initial comments no later than ***April 29,2026.*** This proposal will not be acted on before that time.

BENTON
CLEAN AIR AGENCY

April 14, 2026

Re: Rock Quarry, Concrete and Asphalt Plant
File No: **SEPA 202601502**

Benton County Planning Department
102206 Wiser Pkwy
Kennewick, WA 99338

Proponent:
Interstate Concrete and Asphalt Plant
188322 S Plymouth Industrial Rd
Plymouth, WA 99346

Dear Ms. James,

It has come to our attention that you are reviewing a proposed project which will include a rock quarry, concrete and asphalt plant, for the above named applicant in Benton County, WA.

Washington Administrative Code **(WAC) 173-400-110 New source review for sources and portable sources**, including the operations described above, may require:

(2) Approval requirements.

(a) A notice of construction application must be filed and an order of approval must be issued by the permitting authority prior to the establishment of any new source… (rock crusher, concrete and asphalt plant)

Benton Clean Air Agency Regulation 1 requires that any rock crushing, concrete or asphalt facility must first file a Notice of Construction (NOC), submit the appropriate filing and engineering fees, and receive an approval to operate prior to operation of the source.

Thank you for the opportunity to comment on this proposal. If you have any questions, or would like further information on this subject, please contact us at (509) 783-1304.

Sincerely,

John Lyle

John Lyle
Air Quality Specialist

Jill James **HEM 1.11**

From: Essig, James <[redacted]>
Sent: Tuesday, April 14, 2026 1:47 PM
To: Planning Department
Subject: [EXTERNAL] CUP 2026-009 / EA2026-008

Follow Up Flag: Follow up
Flag Status: Flagged

Please add me to the interested parties list for this project and please provide any future SEPA Determination or permit actions associated with the proposal.
CUP 2026-009 / EA2026-008

Thanks,
James

James Essig
District Resource Development Manager
1525 E. Marine View Drive
Everett, WA 98201

Direct: [redacted]
Email: [redacted]

www.graniteconstruction.com

Jill James **HEM 1.12**

From: Shane Elledge
Sent: Wednesday, April 22, 2026 1:56 PM
To: Planning Department
Subject: RE: SEPA Consultation for Review - EA 2026-008 and CUP 2026-009 - Interstate Concrete and Asphalt

Good afternoon,

Publick Works has comments on SEPA or CUP.

Thank you.

R. Shane Elledge, LSIT • *Engineering Associate*
Benton County Public Works
102206 Wiser Parkway , Kennewick WA, 99338
(509) 786-5611 Ext: 5531

From: Planning Department <Planning.Department@co.benton.wa.us>
Sent: Tuesday, April 14, 2026 11:33 AM
To: Brad O'Brien <Brad.Obrien@co.benton.wa.us>; Troy Taylor <Troy.Taylor@co.benton.wa.us>; Code Enforcement <code.enforcement@co.benton.wa.us>; chiefwatt@bcfd6.com; Gary Tiplady <Gary.Tiplady@co.benton.wa.us>; Cristina Woods <Cristina.Woods@co.benton.wa.us>; Shane Elledge <Richard.Elledge@co.benton.wa.us>; Dylan Krantz <Dylan.Krantz@co.benton.wa.us>; erin.hockaday@bfhd.wa.gov; jodeer@bfhd.wa.gov; Deana.chiodo@bfhd.wa.gov; jabrown@bentonrea.org; ccooke@bentonrea.org; john.lyle@bentoncleanair.org; deon.steichen@bentoncleanair.org; tyler.thompson@bentoncleanair.org; alex@futurewise.org; tim@futurewise.org; blm_or_sp_mail@blm.gov; jhoff@usbr.gov; envreview@gmail.com; sepa@dahp.wa.gov; separegister@ecy.wa.gov; r3planning@dfw.wa.gov; sepa.reviewteam@doh.wa.gov; sepacenter@dnr.wa.gov; scplanning@wsdot.wa.gov; enviroreview@yakama.com; ashleymorton@ctuir.org; careymiller@ctuir.org; cgarner@usbr.gov
Subject: SEPA Consultation for Review - EA 2026-008 and CUP 2026-009 - Interstate Concrete and Asphalt

Good morning,

The Benton County Planning Department has prepared a Notice of Application for consultation in accordance with the State Environmental Policy Act Regulation. This consultation for Project #EA 2026-008 and Conditional Use Permit #CUP 2026-009 is for Interstate Concrete and Asphalt on behalf of American Rock Products, who is proposing a commercial gravel mining, crushing, washing, processing, stockpiling, material sales, concrete and asphalt plant. It is being circulated for review by all agencies with jurisdiction. We appreciate your preliminary review of the proposal and return initial comments no later than ***April 29,2026.*** This proposal will not be acted on before that time.

All necessary documents regarding the proposed project can be found utilizing the link below:

SEPA record number 202601502, "Interstate Concrete and Asphalt Commercial Plant"

Have a wonderful week ahead,

Jill James

HEM 1.13

From: MacNaughton, James (DAHP) <james.macnaughton@dahp.wa.gov>
Sent: Friday, April 24, 2026 3:01 PM
To: Planning Department; Andrea Watts
Cc: 'Ashley M. Morton'; Jessica Lally; lawrence.squiemphen@ctwsbnr.org; Gregg Kiona; Ian Gray
Subject: [EXTERNAL] 2026-04-03101 - RE: SEPA Consultation for Review - EA 2026-008 and CUP 2026-009 - Interstate Concrete and Asphalt
Attachments: 2026-04-03101_Survey Requested.pdf

Good Afternoon Andrea

Thank you for reaching out and allowing DAHP to comment on this project. Please see the attached letter from the DAHP recommending an archaeological survey with testing of a section of the project area, prior to ground disturbing activities (ground disturbance includes grading, cutting roads, trenching for utilities or moving heavy equipment). There is a pre-Contact site just south of the project area increasing risk of unanticipated finds of archaeology. The entire project area is also within land that is considered to be of specific cultural importance to the Affected Tribes. I have assigned Project Tracking # 2026-04-03101 to your project. For convenience, please include this number with all correspondence about the project.

This decision was reached based on information provided by you at the time of review. Any significant changes to the project area may prompt further consultation and changes to this decision. Also, Tribal Cultural Agencies possess proprietary knowledge that could also change this decision. We appreciate receiving copies of any correspondence from our Tribal partners.

Feel free to contact me if you have questions about these recommendations.

All Best

James

dahp
DEPT OF ARCHAEOLOGY + HISTORIC PRESERVATION

James MacNaughton, MSc, RPA *(He/Him)*
Local Government Archaeologist
Email: James.MacNaughton@dahp.wa.gov
Mobile: (360) 280-7563 | Main Office: (360) 586-3065
Hours: 7AM - 3:30PM Monday to Friday
Physical Address: 1110 Capitol Way South Suite 30, Olympia, WA 98501
Mailing Address: PO Box 48343, Olympia, WA 98504-8343
www.dahp.wa.gov

Please note that many DAHP employees are working from home. E-mail will be the best method of communication.

From: Planning Department <Planning.Department@co.benton.wa.us>
Sent: Tuesday, April 14, 2026 11:33 AM
To: Brad O'Brien <Brad.Obrien@co.benton.wa.us>; Troy Taylor <Troy.Taylor@co.benton.wa.us>; Code Enforcement <code.enforcement@co.benton.wa.us>; Benton County Fire Protection District #6 (DNR) <chiefwatt@bcfd6.com>; Gary Tiplady <Gary.Tiplady@co.benton.wa.us>; Cristina Woods <Cristina.Woods@co.benton.wa.us>; Shane Elledge <Richard.Elledge@co.benton.wa.us>; Dylan Krantz

Allyson Brooks Ph.D., Director
State Historic Preservation Officer

April 24, 2026

Andrea Watts
Senior Planner
Benton County

In future correspondence please refer to:
Project Tracking Code: **2026-04-03101**
Property: Benton County - EA 2026-008 CUP 2026-009 - Interstate Concrete and Asphalt
Re: **Survey Requested**

Dear Andrea Watts:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) and providing documentation regarding the above referenced project. As a result of our review, our professional opinion is that part of the project area has the potential to contain archaeological resources. The project is in an area determined to be at Very High- risk along Four Mile Canyon Creek. Further, there is a sensitive pre-Contact site in Four Mile Canyon 113m south of the Project Area, adding to the risk of archaeological resources being present. The scale of the proposed ground disturbing actions would destroy any archaeological resources present. Identification during construction is not a recommended detection method because inadvertent discoveries often result in costly construction delays and damage to the resource. Therefore, we recommend a professional archaeological survey with testing of the portion of the project area depicted in the attached map be conducted prior to ground disturbing activities. We also recommend continuing consultation with the Affected Tribes' cultural committees and staff regarding cultural resource issues.

These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with Washington State law. Should additional information become available, our assessment may be revised.

Thank you for the opportunity to comment on this project and we look forward to receiving the survey report. The survey report should be uploaded directly into the DAHP Online WISAARD system by the cultural resource consultant to expedite DAHP review. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. Should you have any questions, please feel free to contact me.

Sincerely,

James MacNaughton, M.S.
Local Government Archaeologist
(360) 280-7563
James.MacNaughton@dahp.wa.gov

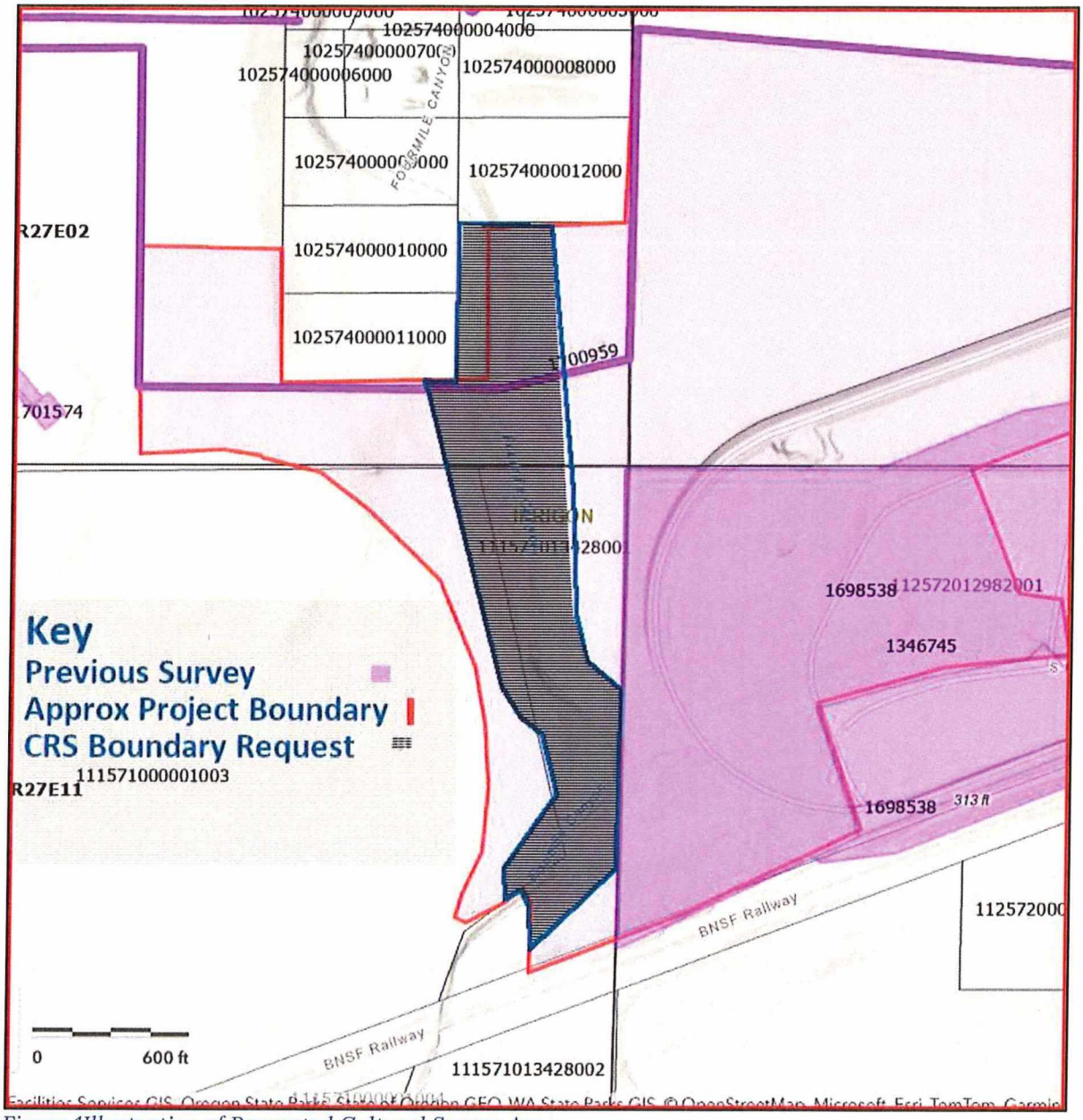


Figure 1Illustration of Requested Cultural Survey Area

Jill James

HEM 1.14

From: Maikis, Troy (DFW) <Troy.Maikis@dfw.wa.gov>
Sent: Friday, April 24, 2026 5:30 PM
To: Andrea Watts; Planning Department
Cc: Didricksen, Daniel J (DFW); Downes, Scott G (DFW)
Subject: [EXTERNAL] RE: SEPA Consultation for Review - EA 2026-008 and CUP 2026-009 - Interstate Concrete and Asphalt
Attachments: Interstate Concrete and Asphalt Commercial Plant - EA 2026-008 Comment Letter WDFW.pdf

Andrea,

Please see WDFW's comments on the proposed Interstate Concrete and Asphalt Commercial Plant (EA 2026-008 / CUP 2026-009) project.

Thank you,
Troy Maikis
Area Habitat Biologist; Benton and Franklin Counties
Washington Department of Fish & Wildlife
2620 Commercial Ave
Pasco, WA 99301
(509) 312-8117

From: DFW R3planning <R3planning@dfw.wa.gov>
Sent: Tuesday, April 14, 2026 2:45 PM
To: Maikis, Troy (DFW) <Troy.Maikis@dfw.wa.gov>
Cc: Didricksen, Daniel J (DFW) <Daniel.Didricksen@dfw.wa.gov>; Downes, Scott G (DFW) <Scott.Downes@dfw.wa.gov>
Subject: FW: SEPA Consultation for Review - EA 2026-008 and CUP 2026-009 - Interstate Concrete and Asphalt

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From: Planning Department <Planning.Department@co.benton.wa.us>
Sent: Tuesday, April 14, 2026 11:33 AM
To: Brad O'Brien <Brad.Obrien@co.benton.wa.us>; Troy Taylor <Troy.Taylor@co.benton.wa.us>; Code Enforcement <code.enforcement@co.benton.wa.us>; Benton County Fire Protection District #6 (DNR) <chiefwatt@bcfd6.com>; Gary Tiplady <Gary.Tiplady@co.benton.wa.us>; Cristina Woods <Cristina.Woods@co.benton.wa.us>; Shane Elledge <Richard.Elledge@co.benton.wa.us>; Dylan Krantz <Dylan.Krantz@co.benton.wa.us>; Erin Hockaday <Erin.hockaday@bfhd.wa.gov>; JoDee Peyton <jodeer@bfhd.wa.gov>; Deana Chiodo <deana.chiodo@bfhd.wa.gov>; jabrown@bentonrea.org; ccooke@bentonrea.org; john.lyle@bentoncleanair.org; deon.steichen@bentoncleanair.org; tyler.thompson@bentoncleanair.org; alex@futurewise.org; tim@futurewise.org; blm_or_sp_mail@blm.gov; jhoff@usbr.gov; envreview@gmail.com; DAHP SEPA <sepa@dahp.wa.gov>; ECY RE SEPA REGISTER <separegister@ecy.wa.gov>; DFW R3planning <R3planning@dfw.wa.gov>; DOH EPH SEPA <SEPA.reviewteam@doh.wa.gov>; DNR RE SEPACENTER <SEPACENTER@dnr.wa.gov>; scplanning@wsdot.wa.gov; enviroreview@yakama.com; ashleymorton@ctuir.org; careymiller@ctuir.org; cgarner@usbr.gov
Subject: SEPA Consultation for Review - EA 2026-008 and CUP 2026-009 - Interstate Concrete and Asphalt

External Email

State of Washington
Department of Fish and Wildlife
2620 North Commercial Avenue, Pasco, WA 99301
Phone: (509) 312-8117, E-mail: Troy.Maikis@dfw.wa.gov

April 24, 2026

Andrea Watts
Community Development Dept., Planning Division
102206 E. Wiser Parkway
Kennewick WA 99338

Re: Interstate Concrete and Asphalt Commercial Plant - EA 2026-008

The Washington Department of Fish and Wildlife (WDFW) has reviewed relevant maps and documents for the proposed Interstate Concrete and Asphalt Commercial Plant (EA 2026-008, CUP 2026-009). Development on Parcel # 1-1257-201-2982-001/ 188322 S Plymouth Industrial Rd.

The Critical Habitat Report breaks the areas down into three zones, but it is unclear as to what areas within each zone are proposed for work under the proposed permit. The Reclamation Plan shows Zone 1 as a mix of proposed and future work, Zone 2 as Phase 1 and 2 work, and Zone 3 as a mix of Phase 2, 3, and 4 work with a large area where no work is proposed at all. WDFW would like to ask for a clarification of the work areas as well as how the survey area was selected.

The Critical Habitat Report states that "no critical fish and wildlife habitat was confirmed" for Zone 1 but then notes the presence of shrubsteppe overstory vegetation. Aerial photographs indicate that these small pockets of shrubsteppe vegetation may be occurring on the far eastern corner and near the power line area. WDFW would like clarification on these locations as well as if there is a plan to preserve them on site or mitigate for their loss.

The Critical Habitat Report states that "no critical fish and wildlife habitat was confirmed" for Zone 2, but the photographs provided seem to potentially contain native shrubs and bunchgrasses. This seems to indicate the presence of vegetation that is consistent with WDFW's current definition of shrubsteppe habitat.

The Critical Habitat Report notes the presence of shrubsteppe habitat in Zone 3, and specifically calls out the areas to the east of Fourmile Creek. The report states that this area is not designated for active mining, but the Reclamation Plan denotes this area as Phases 2-4. WDFW would like clarity on what work will be occurring in Zone 3.

While the shrubsteppe habitat within the survey area may be impacted by ongoing activities in the area, it still provides functions and values that are that are utilized by PHS species. The project area is mapped as shrubsteppe habitat on WDFW's Priority Habitats and Species (PHS) maps as well as Ferruginous Hawk home range habitat. Additionally, there are observations of Burrowing Owl and Sage Thrasher a short distance to the west of the project area.

WDFW recommends that The County and project developers work together to develop a mitigation plan in accordance with Benton County Code 15.02.220 to avoid impacts to and/or provide mitigation for any loss of shrubsteppe habitat functions and values on the site. WDFW would like to request a site visit to clarify if there is shrubsteppe habitat on the site and to discuss any proposed mitigation measures prior to the issuance of the Conditional Use Permit.

Many birds local to our area as well as active nests are listed as "protected wildlife" under RCW 77.12.020(3). To avoid impacts to protected songbird species, WDFW recommends avoiding beginning any work on the site in the spring or summer nesting seasons (February 15 – July 31). If this is not possible for this project, please contact WDFW Area Habitat Biologist Troy Maikis (troy.maikis@dfw.wa.gov) to discuss potential survey, avoidance, and monitoring protocols.

WDFW looks forward to working with Benton County on this project to ensure the best outcome for the county, its residents, and our local wildlife.

Sincerely,

Troy Maikis
Area Habitat Biologist; Benton and Franklin Counties
Washington Department of Fish & Wildlife
2620 Commercial Ave
Pasco, WA 99301
(509) 312-8117
Troy.Maikis@dfw.wa.gov

cc: Daniel Didricksen, WDFW Habitat Program Manager, Region 3, Yakima
Scott Downes, Fish & Wildlife Habitat Regional Land Use Lead, Region 3, Yakima

Jill James

HEM 1.15

From: Gerardo Cuevas <[redacted]>
Sent: Monday, April 27, 2026 7:06 PM
To: Planning Department
Subject: [EXTERNAL]

Hello good evening i received a paper on the mail that a project of gravel mining would be taking place near my land and they also showed a map and it highlights the surrounding area do you know if they will be making a road to be able to access where they will be mining or will i have to attend the hearing to find that out my parcel id for my land is 10257400001000

Jill James **HEM 1.16**

From: ECY RE CRO SEPA Coordinator <crosepa@ecy.wa.gov>
Sent: Tuesday, April 28, 2026 8:29 AM
To: Planning Department
Subject: [EXTERNAL] SEPA 202601502 Comments for EA 2026-008, CUP 2026-009
Attachments: SEPA 202601502 ECY Comments.pdf

Greetings,

Attached is the Department of Ecology comment letter for the Interstate Concrete and Asphalt Commercial Plant.

Please share these comments with the applicant.

Thank you,
Amber Johnson (she/her)
SEPA/ERTS Coordinator
Department of Ecology, Central Region Office
Ph. 509-723-5677

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Central Region Office

1250t Alder St., Union Gap, WA 98903-0009 • 509-575-2490

April 28, 2026

Andrea Watts
Benton County Planning Department
102206 E Wiser Parkway
Kennewick, WA 99338

RE: SEPA 202601502; EA 2026-008, CUP 2026-009

Dear Andrea Watts:

Thank you for the opportunity to comment on the Prethreshold Consultation for the Interstate Concrete and Asphalt Commercial Plant. We have reviewed the documents and have the following comments.

Water Quality Program

The Sand and Gravel General Permit (SGGP) from the Department of Ecology (Ecology) regulates discharges of process water, stormwater, and water from mine dewatering into waters of the state associated with sand and gravel operations, rock quarries, and similar mining operations. The permit also covers concrete batch plant and hot-mix asphalt operations.

All new facilities and un-permitted existing facilities that intend to obtain coverage, and permitted existing facilities planning a significant process change must submit a complete and accurate Notice of Intent (NOI). The Permittee must submit the NOI no less than one hundred and eighty (180) days before beginning any activity that may result in the discharge of any pollutant.

To apply, go to Ecology's Sand and Gravel General Permit webpage. For technical assistance, contact Alex Barnes, Sand & Gravel General Permit Manager at alex.barnes@ecy.wa.gov or by phone at (509) 746-8415.

Shorelands and Environmental Assistance (SEA) Program

Thank you for the opportunity to review this project. The National Wetlands Inventory, USGS Topographic Maps, Aerial Photos, and the National Hydrography Dataset all indicate an intermittent or ephemeral stream occupying Fourmile Canyon. There is indication of distinct bands of vegetation that may indicate presence of wetlands. Prior to any ground disturbing activities that will impact this area we recommend that a Qualified Wetland Professional conduct a wetland determination and delineation following the Army Corps of Engineers Wetland Delineation Manual and Arid West Supplement and a wetland rating following the Washington State Wetland Rating Manual for Eastern Washington. Please reach out to Ryan Anderson (509)379-1917 or ryan.anderson@ecy.wa.gov with any questions.

Spills Preparedness, Prevention and Response Program

A SPCC plan may be required if oils are stored onsite (diesel, asphalt, etc) (40 CFR 112). Please refer to those regulations for any requirements need to be met in order to have aboveground storage tanks onsite.

Describe the number of storage tanks planned, their capacity, and type of oil service each will have. Include whether or not they are horizontal or vertical tanks and shop-built or field constructed.

Provide design code used to design and construct each tank.

Provide inspection code used to inspect each tank (API 653, STI SP001, etc).

Provide details for secondary containment type(s) for the tanks.

Provide details for oil transfers will occur to supply each tank.

Thank you for considering our comments. If you have any questions or would like to respond to our comments, please contact Angela Deardorff-Zeigenfuse, Project Specialist with the Spills Program at (360) 480-2263 or by email at angela.zeigenfuse@ecy.wa.gov .

Water Resources Program

In Washington State, prospective water users must obtain authorization from the Department of Ecology before diverting surface water or withdrawing ground water, with one exception. Ground water withdrawals for a project up to 5,000 gallons per day used for single or group domestic supply, up to 5,000 gallons per day used for industrial

purposes, stock watering, and for the irrigation of up to one-half acre of non-commercial lawn and garden are exempt from the permitting process. Water use under the RCW 90.44.050 exemption establishes a water right that is subject to the same privileges, restrictions, laws and regulations as a water right permit or certificate obtained directly from Ecology. If you have any questions or would like to respond to these Water Resources comments, please contact Nathan Longoria at (509) 907-1752 or email at Nathan.Longoria@ecy.wa.gov.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Sincerely,



Amber Johnson
SEPA Coordinator, Central Region Office
509-723-5677
crosepa@ecy.wa.gov

Jill James **HEM 1.17**

From: Kaiser, Mark <mark.kaiser@wsdot.wa.gov>
Sent: Wednesday, April 29, 2026 3:47 PM
To: Planning Department
Cc: Prilucik, Jacob; Hatfield, Aaron
Subject: [EXTERNAL] EA 2026-008 and CUP 2026-009 - Interstate Concrete and Asphalt
Attachments: BentCo_EA 2026-008_Interstate_Concrete.pdf

Andrea,

Attached are WSDOT's comment for EA 2026-008 and CUP 2026-009 - Interstate Concrete and Asphalt.

Thanks

Mark Kaiser
WSDOT – Planning
2809 Rudkin Rd.
Union Gap, WA 98903-1648

Phone: 509-577-1668

Washington State Department of Transportation

South Central Region
2809 Rudkin Road
Union Gap, WA 98903-1648
509-577-1600 / FAX: 509-577-1603
TTY: 1-800-833-6388
www.wsdot.wa.gov

April 29, 2026

Benton County Planning Department
P.O. Box 910
Prosser, WA 99350

Attention: Andrea Watts, Senior Planner

Subject: EA 2026-008 and CUP 2026-009 - Interstate Concrete and Asphalt
SR 14 MP 178.90 right – Plymouth Industrial Rd.

We have reviewed the proposed project and have the following comments.

- The subject property is in the vicinity of State Route 14 (SR 14), a partially controlled limited access facility with a posted speed limit of 65 miles per hour. WSDOT has acquired all access rights to the highway. Access to the property is available via the Plymouth Industrial Road intersection at milepost 178.90 Rt. Direct access to SR 14 is prohibited.

- All loads transported on WSDOT rights-of-way must be within the legal size and load limits or have a valid oversize and/or overweight permit.

- It is the applicant's responsibility to keep and maintain SR 14 free of any of their debris. Any spilled material shall be promptly cleaned up at the applicant's expense.

Thank you for the opportunity to review and comment on this proposal. If you have any questions regarding our comments, please contact Jacob Prilucik at (509) 577-1635.

Sincerely,

Stephen P. (Phil) Nugent Digitally signed by Stephen P. (Phil) Nugent
Date: 2026.04.29 15:41:31 -07'00'

Stephen P. (Phil) Nugent
Region Planning Manager

SPN: jjp/mnk

cc: SR 14 File # 2026_001

Andrea Watts

HEM 1.18

From: Andrea Watts
Sent: Wednesday, April 29, 2026 1:38 PM
To: 'Gerardo Cuevas'
Cc: Planning Department
Subject: RE: [EXTERNAL]

Good afternoon,

Upon reviewing the application materials provided by the applicant there are no road locations indicated. Often times with mining operations road locations can change so there aren't always defined easements or roads. I will get ahold of the applicants to inquire if they have any plans for access roads at this time.

I will get back to you when I have more information.

Regards,

Andrea Watts
Senior Planner
Benton County Community Development Department
Planning Division
102206 E. Wiser Pkwy, Kennewick, WA 99338
Andrea.watts@co.benton.wa.us
(509) 786-5612

From: Gerardo Cuevas [redacted]
Sent: Monday, April 27, 2026 7:06 PM
To: Planning Department <Planning.Department@co.benton.wa.us>
Subject: [EXTERNAL]

Hello good evening i received a paper on the mail that a project of gravel mining would be taking place near my land and they also showed a map and it highlights the surrounding area do you know if they will be making a road to be able to access where they will be mining or will i have to attend the hearing to find that out my parcel id for my land is 10257400001000

Andrea Watts **HEM 1.19**

From: Andrea Watts
Sent: Tuesday, May 5, 2026 3:25 PM
To: 'Gerardo Cuevas'
Cc: Planning Department
Subject: RE: [EXTERNAL]

Good afternoon,

The applicant was able to provide me with some additional information regarding the access roads to the proposed mining operation. They will continue to use the existing road system and have no plans of creating any new roads or access easements on site or to any adjacent parcels.

Please let me know if you have any follow up questions or comments.

Regards,

Andrea Watts
Senior Planner
Benton County Community Development Department
Planning Division
102206 E. Wiser Pkwy, Kennewick, WA 99338
Andrea.watts@co.benton.wa.us
(509) 786-5612

From: Gerardo Cuevas [redacted]
Sent: Wednesday, April 29, 2026 2:05 PM
To: Andrea Watts <Andrea.Watts@co.benton.wa.us>
Cc: Planning Department <Planning.Department@co.benton.wa.us>
Subject: Re: [EXTERNAL]

Ok thank you

On Wed, Apr 29, 2026, 1:37 PM Andrea Watts <Andrea.Watts@co.benton.wa.us> wrote:

> Good afternoon,
>
> Upon reviewing the application materials provided by the applicant there are no road locations indicated. Often times with mining operations road locations can change so there aren't always defined easements or roads. I will get ahold of the applicants to inquire if they have any plans for access roads at this time.
>
> I will get back to you when I have more information.

Regards,



Andrea Watts

Senior Planner

Benton County Community Development Department
Planning Division

102206 E. Wiser Pkwy, Kennewick, WA 99338

Andrea.watts@co.benton.wa.us

(509) 786-5612

From: Gerardo Cuevas [redacted]
Sent: Monday, April 27, 2026 7:06 PM
To: Planning Department <Planning.Department@co.benton.wa.us>
Subject: [EXTERNAL]

Hello good evening i received a paper on the mail that a project of gravel mining would be taking place near my land and they also showed a map and it highlights the surrounding area do you know if they will be making a road to be able to access where they will be mining or will i have to attend the hearing to find that out my parcel id for my land is 10257400001000

Jill James **HEM 1.20**

From:	McDonald, Jana M (CRH Americas Materials) [redacted]
Sent:	Friday, June 12, 2026 11:26 AM
To:	Andrea Watts
Cc:	Planning Department; Damien Hooper; Rasmussen, Jens; Blagg, Wade (American Rock Products)
Subject:	[EXTERNAL] RE: 2026-04-03101 - RE: SEPA Consultation for Review - EA 2026-008 and CUP 2026-009 - Interstate Concrete and Asphalt
Attachments:	Project: 2024-02-00883 ; 2026-05-28_Interstate Concrete and Asphalt Plymouth Quarry.pdf

Andrea,

Please see the attached. RLR completed the additional work requested by DAHP and has provided it to them as well.

Thanks,

Jana McDonald, PE
Resource and Environmental Director – NW Region
Americas Materials | West Division

CRH Americas Materials, Inc.
PO Box 3366
Spokane, WA 99220-3366

O [redacted]
C
F
E

www.crhamericasmaterials.com

From: Andrea Watts <Andrea.Watts@co.benton.wa.us>
Sent: Friday, April 24, 2026 3:40 PM
To: McDonald, Jana M (CRH Americas Materials) [redacted]
Cc: Nilles, Heidi (CRH Americas Materials) [redacted]; Planning Department <Planning.Department@co.benton.wa.us>; Damien Hooper <Damien.Hooper@co.benton.wa.us>
Subject: FW: 2026-04-03101 - RE: SEPA Consultation for Review - EA 2026-008 and CUP 2026-009 - Interstate Concrete and Asphalt

Good afternoon,

Please see attached comment from the Washington Department of Archaeology and Historic Preservation requesting an archaeological survey be conducted for the project area. Within the comment there is a map that shows the extent of the previous surveys that were conducted as well as the boundary of the area where DAHP would like included in the new survey.

With this comment we will have to place both EA 2026-008 and CUP 2026-009 on hold until DAHP has received the new survey and concurred with its findings. I will be sending the official hold letter next week.

Jill James

From: josh rlrcultural.com <josh@rlrcultural.com>
Sent: Wednesday, June 3, 2026 4:30 PM
To: DAHP SEPA
Cc: McDonald, Jana M (CRH Americas Materials)
Subject: Project: 2024-02-00883

Good Afternoon- The addendum report for Project: 2024-02-00883 has been submitted for review.

Thank you,

Josh

Josh Allen
Principal Investigator
RLR Cultural Resources, LLC
Ellensburg, WA 98926
(509) 824-1521 Ext 3



CULTURAL RESOURCES REPORT COVER SHEET

DAHP Project Number: 2026-04-03101

Author: Maria Kovach, M.S.

Title of Report: Supplementary Addendum to DAHP 2024-02-00883: Archaeological Review and Inventory for the Interstate Concrete and Asphalt Plymouth Quarry, Benton County, Washington

Date of Report: June 3, 2026

County(ies): Benton Section(s): 2 and 11 Township: 05N Range: 27E

Quad: Irrigon, WA Acres: 24

PDF of Report uploaded to WISAARD report module (REQUIRED) ☒ Yes

Historic Property Inventory Forms to be Approved Online? ☐ Yes ☒ No

Archaeological Site(s)/Isolate(s) found or amended? ☐ Yes ☒ No

Cemetery/burial site found or amended? ☐ Yes ☒ No

TCP(s) found? ☐ Yes ☒ No

Replace a draft? ☐ Yes ☒ No

Satisfy a DAHP Archaeological Excavation Permit requirement? ☐ Yes # ☒ No

Were Human Remains Found? ☐ Yes DAHP Case # ☒ No

DAHP Archaeological Site #:

SUPPLEMENTARY ADDENDUM TO DAHP 2024-02-00883: ARCHAEOLOGICAL REVIEW AND INVENTORY FOR THE INTERSTATE CONCRETE AND ASPHALT PLYMOUTH QUARRY, BENTON COUNTY, WASHINGTON

June 3, 2026

DAHP Project Number: 2026-04-03101

RLR Report: 2026-30

By
Maria Kovach, M.S.

RLR
CULTURAL RESOURCES, LLC
ARCHAEOLOGY AND HISTORIC PRESERVATION

114 W 4th Ave, Ellensburg, WA 98926
PH (208) 290-4008 E-Mail: josh@rlrcultural.com



Consultation provided to
CRH Americas Materials, Inc.
P.O. Box 3366
Spokane, WA 99220

EXECUTIVE SUMMARY

In 2024, RLR Cultural Resources, LLC. (RLR) was contracted by AgriNorthwest to conduct a cultural resources review to satisfy permitting requirements for the continued exploitation of existing gravel and sand mines located less than two miles west of Plymouth in Benton County, Washinton.

RLR conducted pedestrian surveys of the project areas, totaling 1,160 acres, which are associated with DAHP Project Number 2024-02-00883 (Wilde et al. 2024a) and 2024-03-02079 (Wilde et al 2024b).

In 2026, additional developments within these project areas were proposed by Interstate Concrete and Asphalt, a subsidiary of CRH Americas Materials, Inc (CRH). The Department of Archaeology and Historic Preservation (DAHP) determined a 24-acre part of the project area along Four Mile Canyon to have a very high risk for archaeological resources and recommended further archaeological inventory.

In Wilde et al. (2024a), *A Cultural Resources Review and Inventory for the Agri Northwest Industrial Park Project, Areas 2, 3, 5, and 6, Benton County, Washington*, RLR recommended that additional subsurface testing be included as an addendum to that report in the event of future ground disturbance.

RLR was contracted by CRH to conduct a cultural resource review for the survey area specified by DAHP (Figure 1 and Figure 2). RLR performed subsurface testing to supplement the pedestrian survey conducted in 2024 (Wilde et al. 2024a). This addendum details the results of the 2026 subsurface testing. For the full survey results and additional information, see Wilde et al. (2024a and 2024b).

Subsurface investigation was conducted by Ben Hodges, M.A.S., and Jamie Mickus, B.S., on May 20 and May 21, 2026. A total of 42 shovel test probes (STP) were excavated. No archaeological resources were recorded.

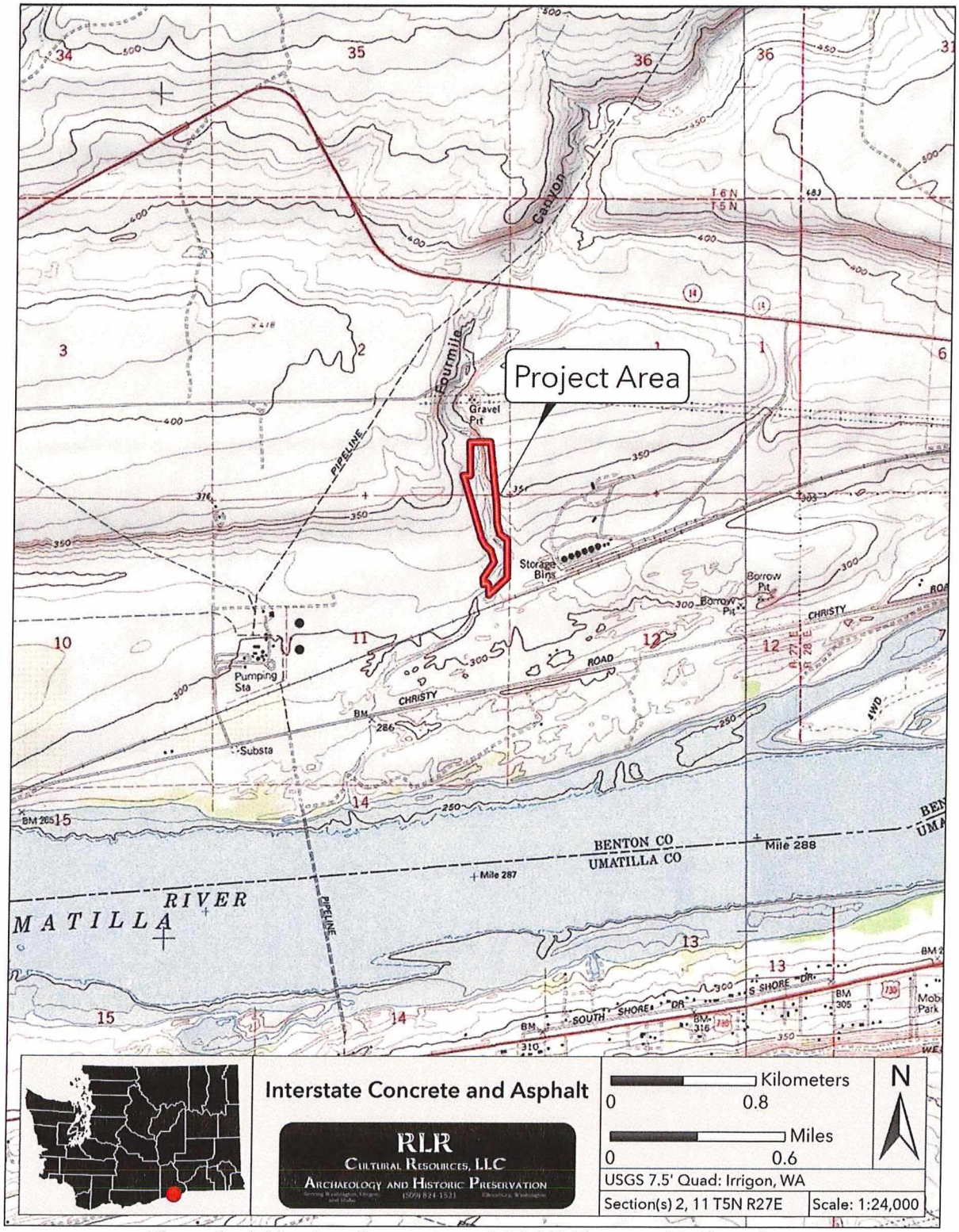


Figure 1. Addendum Survey Area, 1:24:000 Topographic Overview.

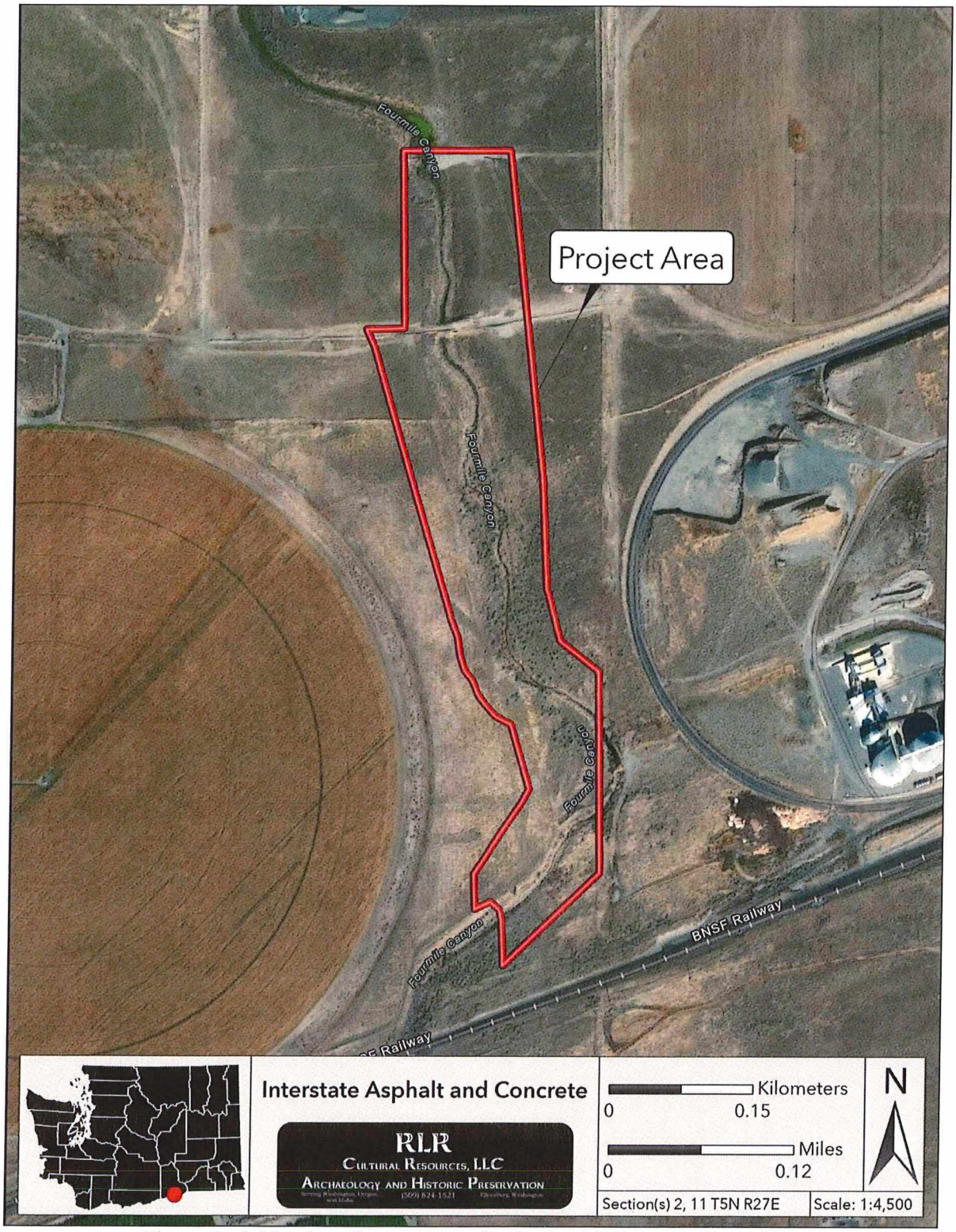


Figure 2. Addendum Survey Area, Orthographic Imagery Overview.

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PROJECT DESCRIPTION

Project Activities: Interstate Concrete and Asphalt, a subsidiary of CRH, plans to expand an existing sand and gravel quarry located less than two miles northwest of Plymouth in Benton County, Washington. The survey area outlined by DAHP will be mined.

Regulatory: The project is on privately owned land. A cultural resources investigation is being conducted at the request of Benton County per recommendations provided by DAHP. This report was prepared in compliance with the Washington State Environmental Protection Act (SEPA).

What circumstances led to this survey: In 2024, RLR conducted a pedestrian survey of the project area associated with DAHP Project Number 2024-02-00883 (Wilde et al. 2024a) and 2024-03-02079 (Wilde et al 2024b). In Wilde et al. (2024a), RLR recommended that additional subsurface testing be included as an addendum to that report in the event of future ground disturbance.

In 2026, Interstate Concrete and Asphalt, a subsidiary of CRH, is seeking a permit to continue the expansion of an existing sand and gravel quarry. DAHP determined that a 24-acre part of the proposed project has a moderate to very high risk potential for archaeological resources and recommended further archaeological review and inventory. RLR was contracted by CRH to conduct a subsurface investigation of the 24-acre survey area.

This report is an addendum to Wilde et al. (2024a), *A Cultural Resources Review And Inventory for the Agri Northwest Industrial Park Project, Areas 2, 3, 5, and 6, Benton County, Washington.*

Archaeological Review: RLR performed subsurface testing to supplement the pedestrian survey conducted in 2024 (Wilde et al. 2024a). This addendum details the results of the 2026 subsurface testing. Subsurface investigation was conducted by Ben Hodges, M.A.S., and Jamie Mickus, B.S., on May 20 and May 21, 2026. A total of 42 shovel test probes (STP) were excavated.

Location and size (in acres) of the survey area: The survey area totals 24 acres.

Legal Information:
County: Benton County
Quadrangle: Irrigon, WA, 7.5-minute
PLSS: Sections 2 and 11, Township 05 North, Range 27 East

INVENTORY METHODOLOGY

RLR developed a research design for this project, based upon the goal of cultural resources management in a rural agricultural context. The immediate goal is to evaluate the survey area for the presence or absence of cultural resources.

RLR expects that the cultural survey will detect evidence of pre-contact and historic use of the project area, if present. To evaluate the potential of this project area for traces of the past, RLR prepared a subsurface testing strategy in conjunction with archival research. For the full results of archival research and initial pedestrian survey, see Wilde et al. (2024a and 2024b).

Expected Results

The State of Washington Predictive Model gives this area moderate to very high risk potential for archaeological resources. Considering nearby recorded pre-contact sites, evidence of pre-contact land utilization is highly likely but difficult to identify given the agricultural use of the project area. Historic sites are also likely, given proximity to the historic town of Plymouth, WA as well as the Columbia River. Depth to restrictive features (typically cobble obstructed soil in this APE) is typically over 66 cmbs.

Methods

RLR placed shovel test probes (STPs) 30 meters apart throughout the 24-acre survey area. STPs were plotted in a gridded pattern, focusing on the center of Four Mile Canyon. The excavated STPs measured a minimum of 40 centimeters in diameter, and crews excavated to a maximum depth of 100 centimeters below surface (cmbs). RLR terminated STPs above this depth when natural obstructions (e.g., highly compacted clay soils, large cobbles, and impassable tree roots) were encountered.

RLR screened all excavated soil through ¼-inch hardware mesh. The STP was photographed upon completion and backfilled. If a planned STP occurred in an area that was unsafe or unreasonable for excavation (utility lines, flooded areas, paved areas, compacted roads, etc.) the STP was not excavated. If the STP was moved to avoid a small obstruction, it was not offset more than five meters.

2026 Addendum Survey Results

RLR performed subsurface testing to supplement the pedestrian survey conducted in 2024 (Wilde et al. 2024a). Subsurface investigation was conducted by Ben Hodges, M.A.S., and Jamie Mickus, B.S., on May 20 and May 21, 2026 (Figure 3). The weather was sunny and clear.



Figure 3. Addendum survey area overview; View: South.

Subsurface Inventory

RLR plotted 49 STPs within the 24-acre survey area. Seven STPs were not excavated due to obstructing surface cobbles and obstructing gravel road surfaces. A total of 42 STPs were excavated (Figure 4 and Figure 5).



Figure 4. Overview of STP 11; View: East.

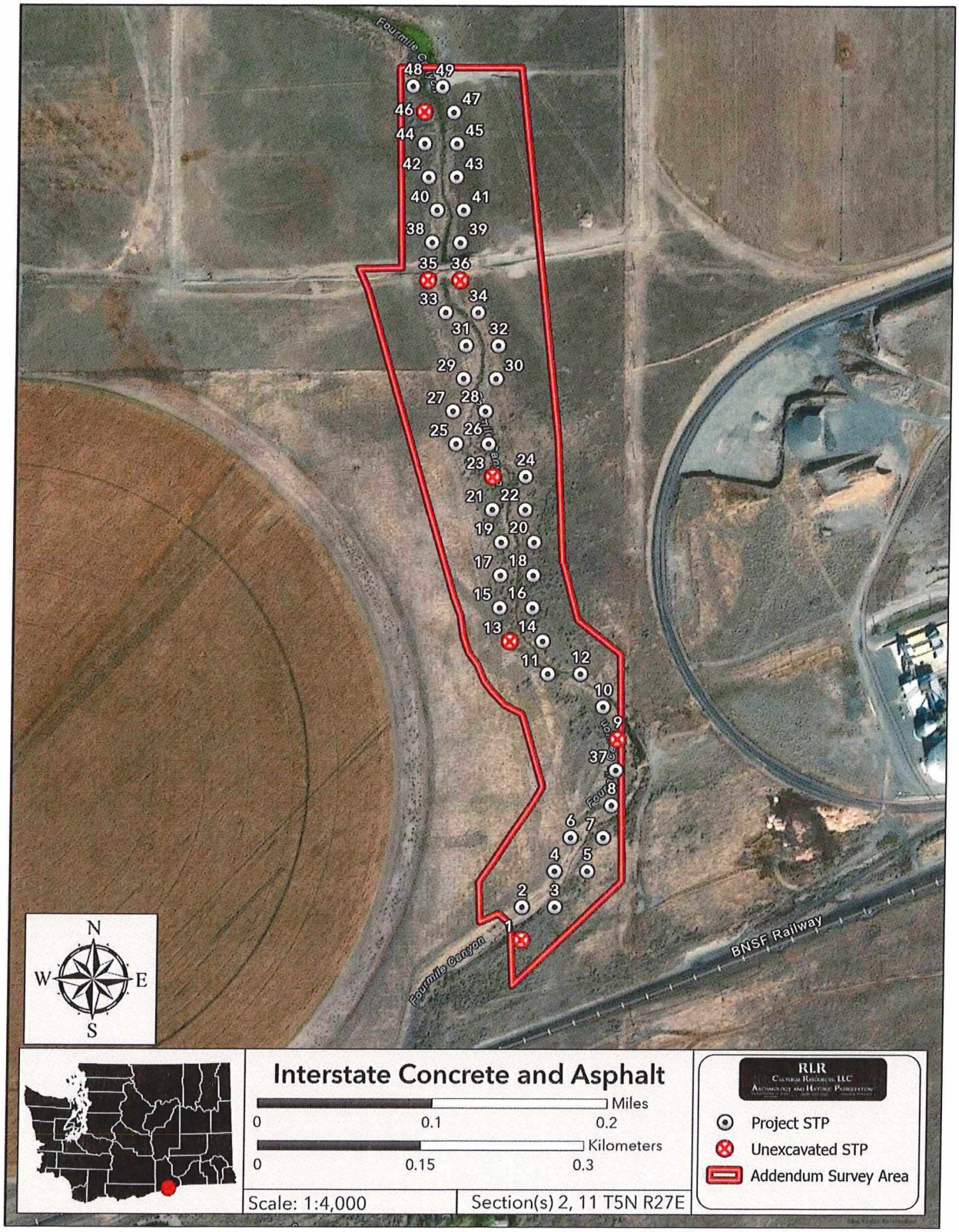


Figure 5. Project STP Map.

Soils were fairly homogenous across the project area, generally consisting of deep sand with varying quantities of pebbles and cobbles. Roughly half of STPs were excavated to depths exceeding 70 cmbs. There were 11 STPs terminated between 8 and 29 cmbs and 9 STPs terminated between 34 and 66 cmbs. All early terminations were caused by obstructing cobbles.

No pre-contact or historic-era resources were identified within the survey area during subsurface testing (Table 1).

Table 1. STP Summaries.

STP #	Depth (cmbs)	Cultural	Stratigraphy	Notes
1	0	N/A	STP was not excavated due to cobble armored surface	
2	110	Negative	0-110 cmbs – Brown sand, loose, dry, less than 5% rootlets, less than 5% angular to subangular pebbles	Terminated at terminal depth
3	29	Negative	0-29 cmbs – Brown sand, loose, dry, less than 5% rootlets, less than 10% angular pebbles and subrounded cobbles	Terminated due to cobble impasse.
4	27	Negative	0-27 cmbs – Brown sand, loose, dry, less than 10% rootlets, less than 20% angular to subangular cobbles and pebbles	Terminated due to cobble impasse
5	106	Negative	0-106 cmbs – Brown sand, loose, dry, less than 5% rootlets, less than 5% angular to subrounded pebbles	Terminated at terminal depth
6	28	Negative	0-28 cmbs – Brown sand, loose, dry, less than 10% rootlets, less than 20% angular to subangular cobbles and pebbles.	Terminated due to cobble impasse
7	105	Negative	0-105 cmbs – Gray brown fine sand, 1-5% subrounded to rounded cobbles and pebbles, quantity increased with depth	Terminated due to cobble impasse
8	28	Negative	0-28 cmbs – Brown sand, loose, dry, less than 10% rootlets, less than 20% angular to subangular cobbles and pebbles	Terminated due to cobble layer
9	0	N/A	STP was not excavated due to cobble armored surface	
10	23	Negative	0-23 cmbs – Brown sand, loose, dry less than 5% rootlets, less than 5% subangular to subrounded cobbles and pebbles	Terminated due to cobble impasse.
11	74	Negative	0-74 cmbs – brown sand, loose, dry, less than 10% rootlets, less than 5% subrounded pebbles	Terminated due to cobble impasse
12	43	Negative	0-30 cmbs – Gray brown fine sand, 1% subrounded to rounded cobbles 30-43 cmbs – Gray brown fine sand, 30-50% subrounded to rounded gravels and cobbles	Terminated due to cobble impasse
13	0	N/A	STP was not excavated due to cobble armored surface	
14	25	Negative	0-15 cmbs – Gray brown fine sand, 1% subrounded to rounded cobbles 15-25 cmbs – Gray brown fine sand, 30-50% subrounded to rounded gravels and cobbles	Terminated due to cobble impasse

Table 1. STP Summaries, continued.

STP #	Depth (cmbs)	Cultural	Stratigraphy	Notes
15	36	Negative	0-36 cmbs – Brown sand, loose, dry with dampness increasing with depth, less than 15% rootlets, less than 5% subrounded to round cobbles and pebbles	Terminated due to cobble impasse
16	64	Negative	0-64 cmbs – Gray brown sand, 1% subrounded to rounded cobbles	Terminated due to cobble impasse
17	21	Negative	0-21 cmbs – Brown sand, moderately compact, dry, less than 25% sub angular to subrounded pebbles	Terminated due to cobble imasse
18	100	Negative	0-100 cmbs – Gray brown fine sand, 1% subrounded to rounded cobbles	Terminated at terminal depth
19	26	Negative	0-26 cmbs – Brown sand, moderately compact, dry, less than 85% angular to rounded cobbles and pebbles	Terminated due to cobble impasse
20	100	Negative	0-100 cmbs – Gray brown fine sand, 1% subrounded to rounded cobbles	Terminated at terminal depth
21	11	Negative	0-11 cmbs – Brown sand, moderately compact, damp, less than 10% rootlets, less than 30% angular to subrounded cobbles and pebbles	Terminated due to cobble impasse
22	64	Negative	0-64 cmbs – Gray brown fine sand, less than 5% subrounded to rounded cobbles	Terminated at terminal depth
23	0	N/A	STP was not excavated due to obstructing boulders on the surface	
24	100	Negative	0-100 cmbs – Gray brown fine sand, less than 5% subrounded cobbles	Terminated at terminal depth
25	106	Negative	0-106 cmbs – Brown sand, moderately compact, moist, less than 15% rootlets, less than 2% subrounded pebbles	Terminated at terminal depth
26	77	Negative	0-77 cmbs – Gray brown fine sand, less than 5% rounded cobbles	Terminated due to cobble impasse
27	102	Negative	0-102 cmbs – Brown sand, moderately compact, moist, less than 15% rootlets, less than 2% subrounded pebbles	Terminated at terminal depth
28	95	Negative	0-75 cmbs – Gray brown fine sand, less than 5% rounded cobbles 75-95 cmbs – Gray brown medium to fine coarse sand, 10% subrounded cobbles	Terminated at terminal depth
29	99	Negative	0-99 cmbs – Brown sand, moderately compact, dry, less than 15% rootlets, less than 2% subrounded pebbles	Terminated at terminal depth
30	96	Negative	0-96 cmbs – Gray brown fine sand, less than 5% rounded cobbles	Terminated at terminal depth
31	77	Negative	0-77 cmbs – Brown sand, loose, dry, less than 10% rootlets, less than 2% subrounded pebbles	Terminated due to cobble impasse
32	100	Negative	0-110 cmbs - Gray brown fine sand, 5% subrounded cobbles	Terminated due to terminal depth
33	37	Negative	0-37 cmbs – Brown sand, loose, damp to moist, less than 15% rootles, less than 5% subrounded pebbles	Terminated due to cobble impasse

Table 1. STP Summaries, concluded.

STP #	Depth (cmbs)	Cultural	Stratigraphy	Notes
34	97	Negative	0-97 cmbs – Gray brown fine sand, 5% subrounded cobbles	Terminated due to terminal depth
35	0	N/A	STP was not excavated due to obstructing road	
36	0	N/A	STP was not excavated due to obstructing road	
37	8	Negative	0-8 cmbs – Brown sand, moderalty compact, dry, less than 40% subangular to subrounded cobbles and pebble	Terminated due to cobble impasse
38	81	Negative	0-81 cmbs – Brown sand, loose, dry, less than 2% subrounded pebbles	Terminated due to cobble impasse
39	82	Negative	0-82 cmbs – Gray brown fine sand, dry, 10% rounded cobbles	Terminated due to cobble impasse
40	81	Negative	0-81 cmbs – Brown sand, loose, dry, less than 2% subrounded pebbles	Terminated due to cobble impasse
41	81	Negative	0-81 cmbs – Gray brown fine sand, dry, 10% rounded cobbles	STP was moved 5m west to avoid steep slope Terminated due to cobble impasse
42	103	Negative	0-103 cmbs – Brown sand, loose, dry with dampness increasing with depth, less than 2% subrounded to rounded cobbles and pebbles	Terminated at terminal depth
43	57	Negative	0-57 cmbs – Gray brown fine sand, dry, 10% rounded cobbles	
44	100	Negative	0-100 cmbs – Brown sand, dry with dampness increasing with depth, loose, less than 5% rounded to subrounded pebbles	Terminated at terminal depth
45	65	Negative	0-65 cmbs – Gray brown fine sand, dry, 10% rounded cobbles	Terminated due to cobble impasse
46	0	N/A	STP was not excavated due to obstructing cobble armored surface	
47	66	Negative	0-66 cmbs – Gray brown fine sand, dry, 10% rounded cobbles	Terminated due to cobble impasse
48	34	Negative	0-30 cmbs – Brown sand, loose, dry with dampness increasing with depth, less than 5% subrounded pebble 30-34 cmbs – Brown sand, loose, dry with dampness increasing with depth, 30% subrounded cobbles and pebbles	Terminated due to cobble impasse
49	29	Negative	0-29 cmbs – Gray brown fine sand, 40% rounded cobbles, dry	Terminated due to cobble impasse

Findings

RLR did not record any archaeological resources within the addendum area. Several ambiguous objects and features were noted but not recorded (NNR).

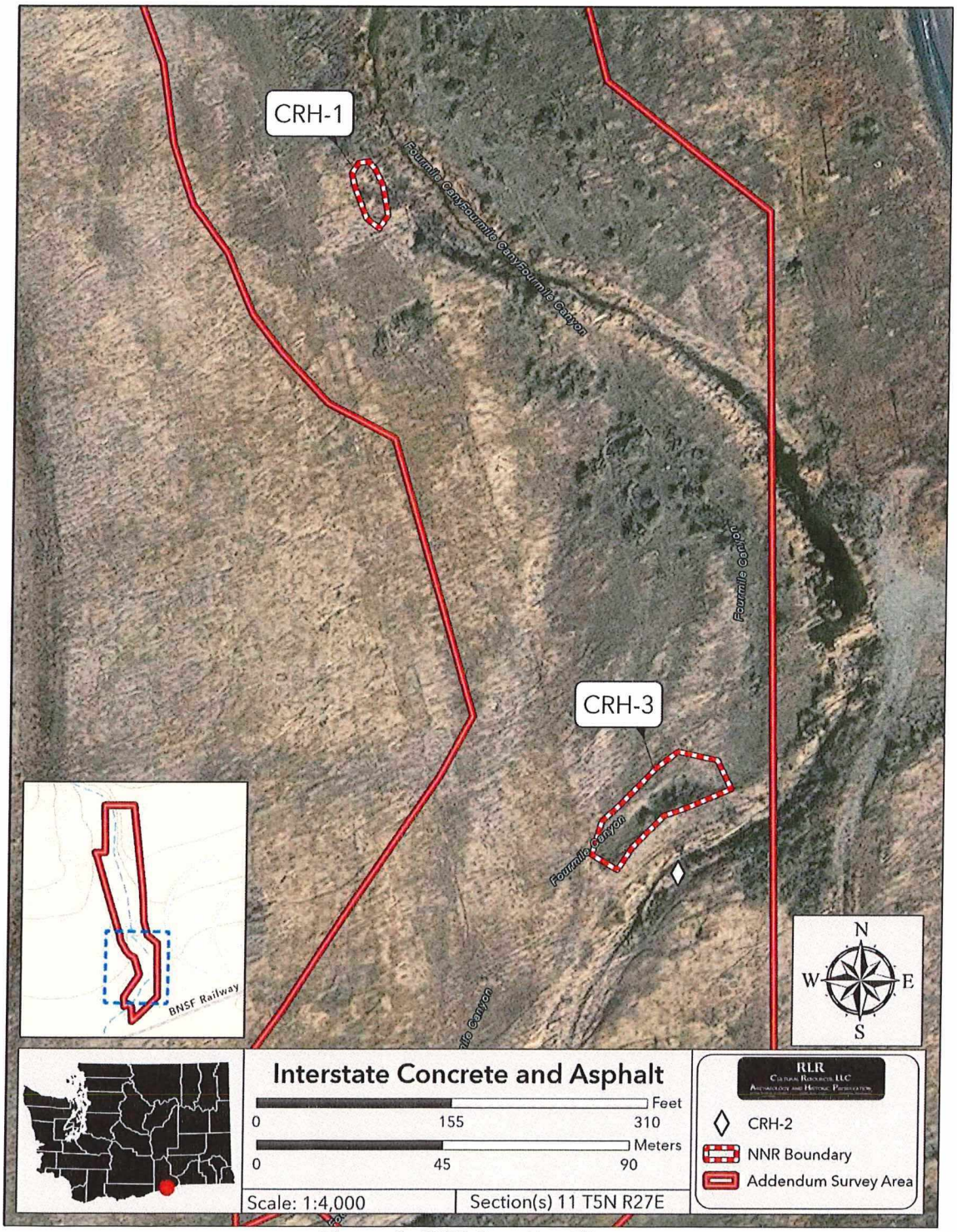


Figure 6. NNR Location Map.

CRH-1

A concentration of deteriorated milled lumber, barbed wire rolls, and nondiagnostic ferrous metal fragments was identified on the west side of Four Mile Creek (Figure 7). Other materials included one oil can, metal and modern PVC pipes, and a large cast iron metal apparatus which may be related to irrigation infrastructure. The debris represents displaced agricultural materials. It was not recorded as a site due to the uncertain age of the deposit.



Figure 7. Overview of CRH-1, showing a pile of fence posts; View: South.

Materials within the site were ambiguous in age. The pile of lumber and barbed wire measures 4 feet 8 inches north-south by 7 feet 11 inches east-west, and 3 feet 1 inch tall. This pile represents a wood-post fence that was removed and discarded in this location at an unknown time.

One 12 foot 9 inch long, 9 inch diameter metal pipe was present in a pile with green and white PVC pipes. Due to their proximity, they were likely deposited at the same time.

The cast iron apparatus is comprised of a large semi-rectangular body and a cylindrical element with numerous hexagonal bolts. Threaded bolts extrude from the end of the cylinder, indicating it likely attaches to another piece of machinery. The function of this apparatus was not determined, but it is likely associated with agricultural activity (Figure 8).

Aside from nondiagnostic metal fragments, only one can was identifiable. This can is a rusted oil or other industrial fluid (solvent, grease, etc.). There are green and white stripes and cautionary text on the body of the can, but the brand is illegible (Figure 9). Though the style of the can is consistent with ca. 1950-1970 styles, given its context among contemporary and ambiguous refuse, it is likely that it was deposited many years after its original production.



Figure 8. Detail of unidentified apparatus within CRH-1.



Figure 9. Detail of oil can within CRH-1.

CRH-2

CRH-2 is a single yellow oil can (Figure 10). Text on the body of the can reads,

> "...uperior quality oil specially / formulated for use in John Deere / transmission and hydraulic systems / provides maximum reliability and / performance. Functions as a..../ and... for transmission fi... / ...differential and hydraulic systems / Also transmits hydraulic force for / steering, braking, transmission, and / equipment controls. This oil meets / John Deere Specification DM J204 / Manufactured for Deere & Company, Mo.../ Made in U.S.A. Printed in U.S.A."

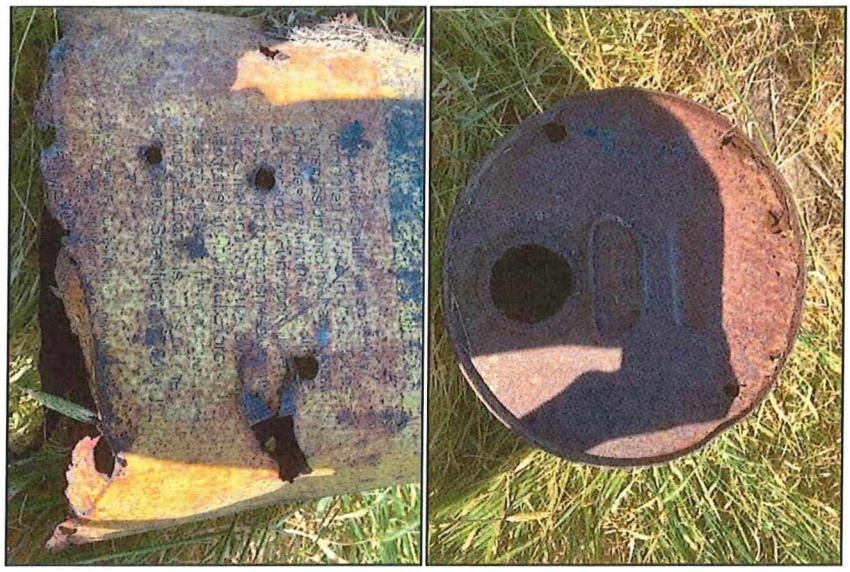


Figure 10. Detail of CRH-2, a Deere oil can.

This can contained oil for agricultural machinery, specifically for John Deere products. It has been repeatedly shot. Based on its general style, the can dates to mid-20th century. However, given that it was used for target practice, the date of deposition likely post-dates its production.

CRH-3

CRH-3 is a linear depression feature located on the northwest side of Four Mile Creek. It does not connect to the creek but is aligned roughly parallel. The depression measures 105 feet northwest-southeast by 40 feet northeast-southwest and is five feet in depth.

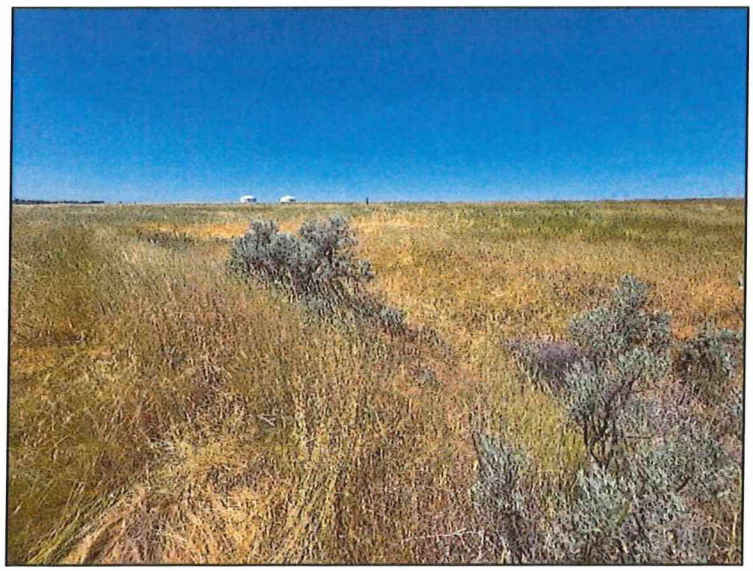


Figure 11. Overview of CRH-3 depression feature; View: Northwest.

The feature appears to be faintly visible in aerial photography from 1955 (CWU 2026). However, it is not completely distinct from the natural topography of Four Mile Canyon. There is no evidence of extensive quarrying or other activities beyond road construction in the surrounding area (CWU 2026). The feature is not clearly discernable in subsequent aerial imagery until 2009 (NETR 2026).

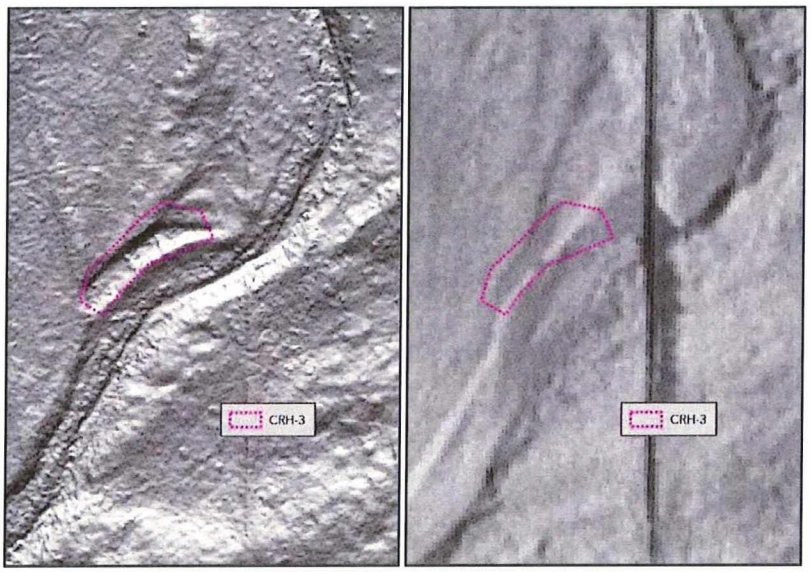


Figure 12. CRH-3, Lidar (WA DNR 2026) and 1955 Aerial Photography (CWU 2026).

Because of the lack of associated artifacts, other features, and documentation, CRH-3 was determined to lack sufficient chronological and functional information to record as an archaeological site.

PROJECT SUMMARY

In 2024, RLR was contracted by AgriNorthwest to conduct a cultural resource review to satisfy permitting requirements for the continued exploitation of existing gravel and sand mines located less than two miles west of Plymouth in Benton County, Washinton. RLR conducted pedestrian surveys of the project areas, totaling 1,160 acres, which are associated with DAHP Project Number 2024-02-00883 (Wilde et al. 2024a) and 2024-03-02079 (Wilde et al 2024b).

In 2026, additional developments within these project areas were proposed by Interstate Concrete and Asphalt, a subsidiary of CRH. DAHP determined a 24-acre part of the project area along Four Mile Canyon to have a very high risk for archaeological resources and recommended further archaeological testing.

RLR was contracted by CRH to conduct a cultural resource review for the survey area specified by DAHP. RLR performed subsurface testing to supplement the pedestrian survey conducted in 2024 (Wilde et al. 2024a).

RLR conducted a subsurface investigation of the 24-acre survey area identified by DAHP on May 20 and May 21, 2026. A total of 42 shovel test probes (STP) were excavated.

No archaeological resources were recorded.

REFERENCES CITED

Central Washington University (CWU). 2026. Central Washington Historical Aerial Photograph Project. Department of Geography, Central Washington University. Electronic document, https://www.gis.cwu.edu/geog/historical_airphotos/, accessed May 2026..

National Environmental Title Research (NETR). 2026. Historic Aerials. Electronic document, https://www.historicaerials.com/viewer, accessed May 026.

Washington Department of Natural Resources (WA DNR). 2026. LIDAR portal. Electronic document, https://lidarportal.dnr.wa.gov/, accessed May 2026.

Wilde, Nicholas C., Aidan Gallagher, Josh Allen, and Maria Kovach. 2024a. A Cultural Resources Review and Inventory for the Agri Northwest Industrial Park Project, Areas 2, 3, 5, and 6, Benton County, Washington.

Wilde, Nicholas C., Aidan Gallagher, Josh Allen, and Maria Kovach. 2024b. Cultural Resources Review and Inventory for the Agri Northwest Industrial Park Project, Area 1, Benton County, Washington [NADB: 1698538]. Copies available on WISAARD.

HEM 1.21

Allyson Brooks Ph.D., Director
State Historic Preservation Officer

July 6, 2026

Planning Department
Benton County, WA

In future correspondence please refer to:
Project Tracking Code: **2024-02-00883**
Property: Agri-Northwest Industrial Park Project, Areas 2, 3, 5, and 6
Re: **Concur with Survey; Follow Inadvertent Finds Plan**

Dear Benton County Planner:

Thank you for contacting the State Historic Preservation Officer (SHPO) and the Department of Archaeology and Historic Preservation (DAHP) with documentation regarding the above-referenced project. In response, we concur with the results and recommendations made in the report entitled "Cultural Resources Review and Inventory for the Agri-Northwest Industrial Park Project, Areas 2, 3, 5, and 6, Benton County, WA," (Wilde, Gallagher et al. 2024). Specifically, we have made the following determinations of eligibility for the National Register of Historic Places (NRHP) based on the report findings:

Archaeological Resources
- Not Eligible for the NRHP but protected under RCW 27.53, and must be avoided: 45BN02498
- Not Eligible for the NRHP: 45BN02390, 45BN02391, 45BN02392, 45BN02393

Because no eligible resources were found within the area of effect during the survey we do not recommend further direct archaeological supervision of the project. However, if the boundary of the APE changes or encroaches on 45BN02498, the site must be avoided or an archaeological permit must be applied for and granted prior to disturbance (RCW 27.53.090, .095). If the project boundary approaches the site boundary a temporary, high-visibility barrier fence must be installed at least 50' offset from the official site boundary. Failure to comply with RCW 27.53.090 can result in costly project delays and significant fines. We do recommend that a standard Inadvertent Finds Plan is followed during all ground disturbing activities.

Please note that the recommendations provided in this letter reflect only the opinions of DAHP. Any interested Tribes may have different recommendations. We appreciate receiving copies of any correspondence or comments from Tribes or other parties concerning cultural resource issues that you receive.

These comments are based on the information available at the time of this review and on behalf of the SHPO pursuant to Washington State law. Please note that should the project scope of work and/or location change significantly, please contact DAHP for further review.

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number is attached to any future communications about this project. Should you have any questions, please feel free to contact me.

Sincerely,

James MacNaughton, M.S.
Local Government Archaeologist
(360) 280-7563
James.MacNaughton@dahp.wa.gov

FARALLON CONSULTING | Grette Associates ENVIRONMENTAL CONSULTANTS

HEM 1.22

American Rock Products
Attn: Jana McDonald
PO Box 3366
Spokane, WA 99220

July 30, 2026

RE: Plymouth Site Critical Areas Support Response to WDFW Comments – EA 2026-008

To whom it may concern,

Farallon Consulting LLC, dba Grette Associates was contracted by American Rock Products to conduct a critical areas assessment and desktop review pertaining to comments from Washington Department of Fish and Wildlife dated April 24, 2026. The purpose of this letter is to address the comments from WDFW Area Habitat Biologist, Troy Maikis, in relation to a previously submitted Critical Habitat Report regarding the presence of shrub-steppe habitat presence and conditions and the associated recommendations concerning mitigation on Benton County parcel # 1-1257-201-2982-001. The following letter includes natural resource observations made during a site visit conducted May 14, 2026.

Site Investigation

Grette investigated the subject parcel to confirm any existing shrub-steppe habitat as mapped by WDFW Priority Habitat and Species (PHS) online mapper.

Methodology

The habitat assessment was conducted across the site where proposed mining activities will occur. Once onsite, a Grette biologist walked the subject parcel to characterize the existing habitats, primarily by identifying specific native vegetation through direct observation of species composition and assemblages. Additionally, any other distinct features, signs of wildlife utilization, and areas of disturbance observed while on the property were noted.

Shrub-steppe habitat is defined as:

> "*A nonforested vegetation type consisting of one or more layers of perennial bunchgrasses and a conspicuous but discontinuous layer of shrubs. Although Big Sagebrush is the most widespread shrub-steppe shrub, other dominant shrubs include Antelope bitterbrush, Threetip Sagebrush, Scabland Sagebrush, and Dwarf Sagebrush* (WDFW 2021, p. 268)."

Based on this definition, shrub-steppe habitat is characterized by a cover of any of the aforementioned shrubs of more than 5% (Rocchio and Crawford 2015).

Results

For the purpose of addressing the comments from WDFW, the same habitat zones used in the previously submitted Critical Habitat Report are used here (Figure 1):

- Zone 1 is in an area of historic agricultural land use and is zoned as such by Benton County;
- Zone 2 is designated as Heavy Industrial by Benton County and occurs within an area of present and historic industrial land use;
- Zone 3 contains Fourmile Canyon and is zoned by Benton County for both agricultural and Heavy Industrial land use.

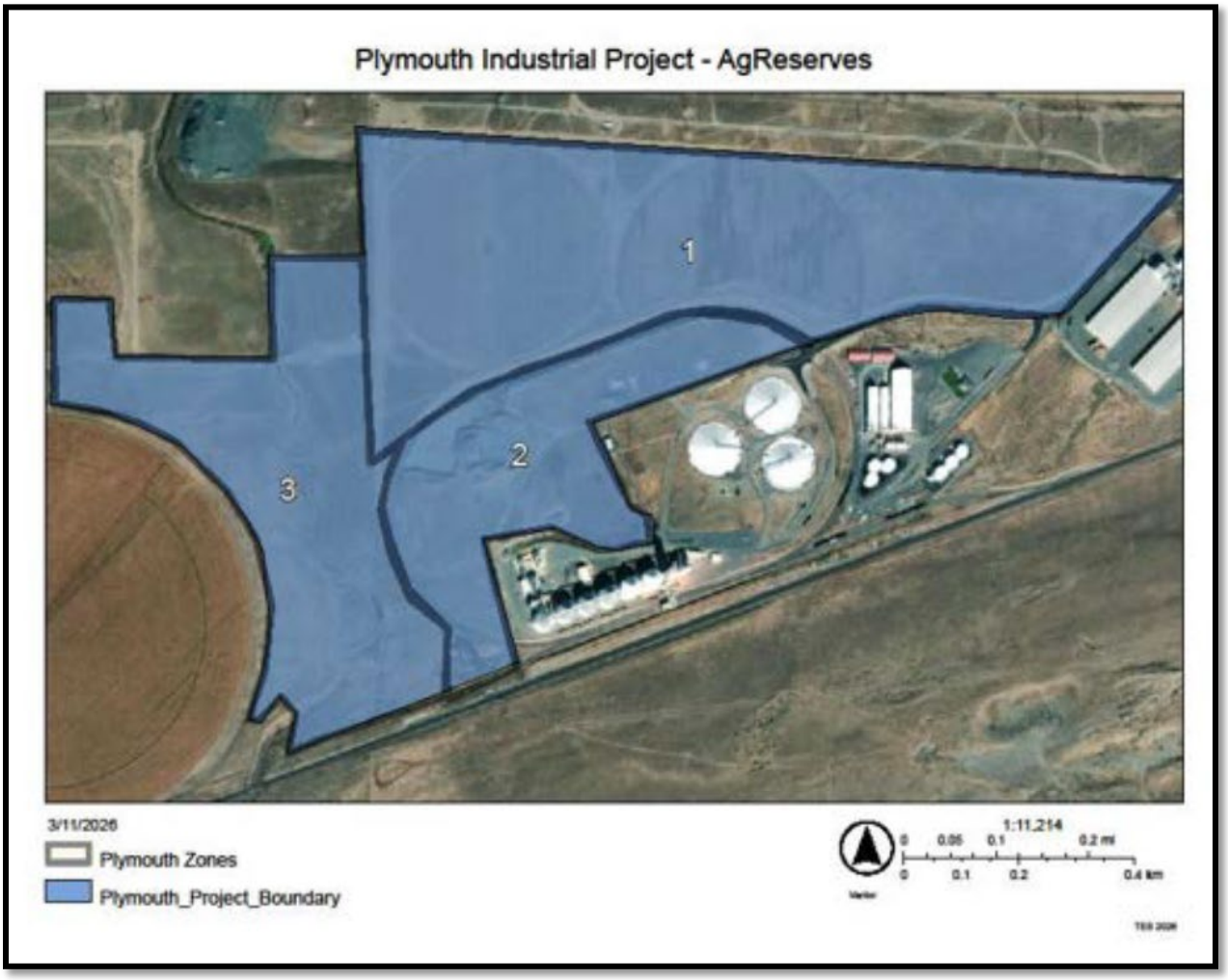


Figure 1. Habitat Zones as depicted by Towey Ecological Services Habitat Assessment Report 3/2026.

At the time of the site investigation, native bunch grasses and shrubs associated with shrub-steppe habitat were observed across the site in isolated patches (Figure 2). While these patches include species common to shrub-steppe habitat, Zone 1 habitat is characterized as low-quality habitat located in a highly disturbed area associated with previous disturbance from agricultural activities. Zone 1 has historically been in agricultural land use and will continue to be used for agricultural purposes until mining activities begin, which could be 5 to 8 years. Though limited species associated with shrub-steppe habitat are present in Zone 1, the dominant species are those associated with agricultural lands and do not provide shrub-steppe habitat function; thus, Zone 1 does not contain shrub-steppe habitat. Since no shrub-steppe habitat is present, mining will not impact any such habitat. Any area in Zone 1 currently presenting vegetation associated with shrub-steppe will require no mitigation for shrub-steppe habitat as the land will be reclaimed for continued agricultural use.

Zone 2 habitat is characterized by isolated patches of sparse vegetation ranging in size from less than half an acre up to 8 acres within previously disturbed industrial lands. Zone 2 is comprised of longstanding industrial activities in an area where low-quality remnant shrub-steppe habitat persists. The industrial land use within Zone 2 has resulted in isolated fragments of remnant vegetation associated with shrub-steppe habitat. **The assessment of these patches of low-quality habitat is due to their isolation, small size, and limited nature. Shrub-steppe habitat is most effective in large, contiguous tracts. Habitat fragmentation and loss of connectivity are listed as two major impacts to**

wildlife that rely on shrub-steppe (Azerrad et al. 2011). Zone 2 is bound immediately to the north, by agricultural land use and to the south by industrial development and a railroad bed. These factors permanently limit the habitat quality of the shrub-steppe. Further, this area lacks connectivity to larger, in-tact tracts of habitat. Shrub-steppe habitat requires larger tracts in order to support species that depend on such habitat (Azerrad et al. 2011). Therefore, smaller, isolated patches of habitat support reduced functions and values. Thus, no mitigation to Zone 2 habitats associated with shrub-steppe-related vegetation is recommended. Rather, it is recommended to restore this habitat to Industrial land use following extraction activities associated with mining operations.

As stated by WDFW, shrub-steppe landscapes are associated with "rolling grassy plains where an overstory of sagebrush and other woody shrubs exist" (https://wdfw.wa.gov/). Zone 3 presents a higher composition of native vegetation and medium quality shrub-steppe habitat east of Fourmile Creek. The Fourmile canyon/creek area is unique to the other shrub-steppe assemblages across the site because of its contiguous nature with larger tracts of high-quality shrub-steppe habitat. The higher quality habitat classification of this area is due to a denser shrub component along the eastern slopes, a higher degree of native bunch grass, forbs and shrub species associated with shrub-steppe habitats, and connectivity to other areas of undisturbed shrub-steppe habitat. Additionally, this area is historically less disturbed, although some portions of this area have been previously disturbed by historical activities.

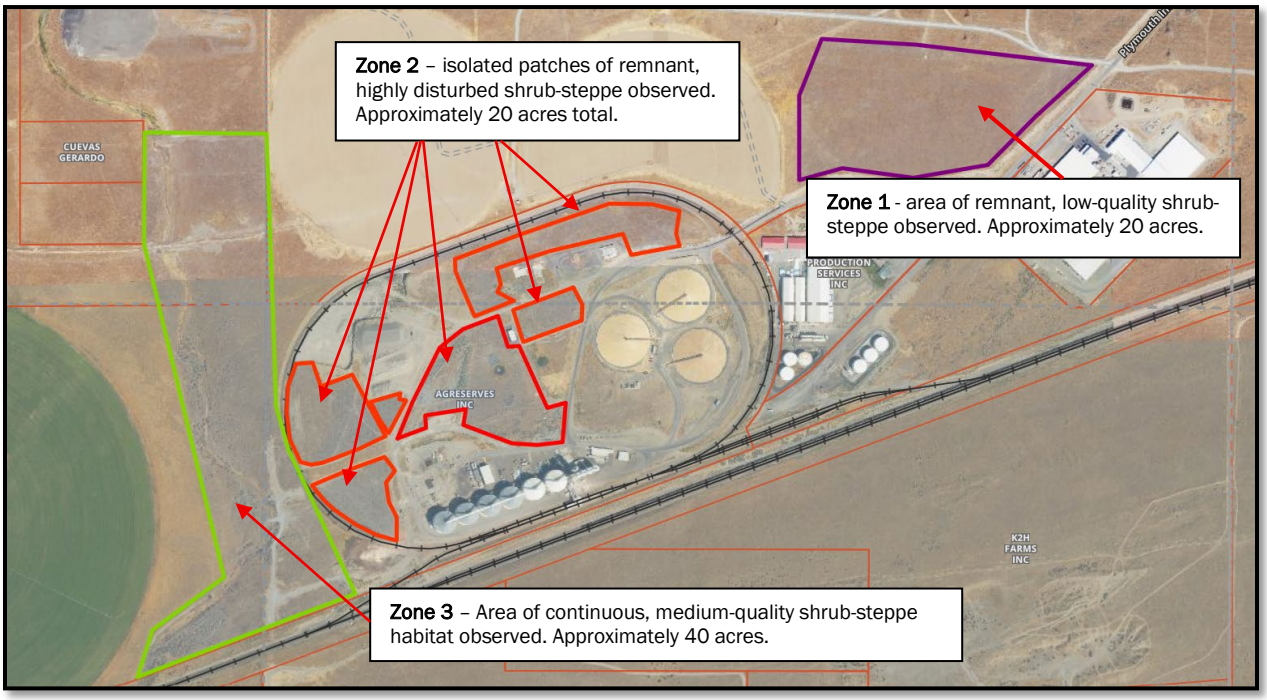


Figure 2. Areas of observed shrub-steppe habitat by habitat zones. Habitat quality ranges from isolated patches of remnant shrub-steppe to continuous medium-quality habitat.

Mitigation is recommended for disturbance to areas of critical shrub-steppe habitat in Zone 3. At the time of the survey varying levels of shrub-steppe habitat were observed. This project and associated impacts were viewed using mitigation sequencing criteria found in Benton County Code (BCC) 15.02.220. The recommended mitigation for the proposed project would occur on-site and meet the standards as outlined in BCC 15.02.210. A formal Habitat Management and Mitigation Plan detailing mitigation for disturbance associated with the proposed mining activities would center around

reclamation of land post extraction activities and avoidance through minimization of impacts to identified areas of high-quality shrub-steppe habitat.

It should be noted that while no species of critical conservation concern were identified at the time of the survey, resident and migratory bird species were observed. Impacts to migratory and nesting bird species associated with mining activities are dependent on the time of year. It is the opinion of the Grette biologist that prior to the onset of mining activities during nesting season, a nest survey should be completed and WDFW recommendations for protection of nesting birds should be observed.

Conclusion

In summary, it is our determination that remnant shrub-steppe habitat persists in disjunct areas across the site. Vegetation associated with shrub-steppe habitat was observed in Zone 1, however historical and continuous agricultural land use precludes the need for mitigation in this Zone. Historical land use activities in Zone 2 have resulted in high degrees of disturbance and consequentially leaves only isolated patches of remnant shrub-steppe habitat with reduced function and values. No mitigation is recommended in Zones 1 and 2 due to the highly disturbed and low-quality habitats associated with disturbance from historical land use. Zone 3 presents a higher quality habitat within the Fourmile Creek drainage, where connectivity to larger tracts of undeveloped shrub-steppe habitat with a greater diversity of native vegetation is present. Mitigation sequencing for impacts associated with mining activities in the form of avoidance and ongoing land reclamation is proposed and will meet the standards of mitigation sequencing criteria as outlined in BCC 15.02.220. This letter is based on conditions observed at the time of the site visit. Conditions are subject to change.

If there are any further questions, please feel free to contact me at (509) 640-3283 or by email at eburgess@farallonconsulting.com .

Sincerely,



Erin Burgess
Staff Biologist

PHOTOGRAPHS



Photo 1. Zone 1 – area of historical agriculture land use. Remnant low-quality shrub-steppe habitat.



Photo 2. Zone 1 – area of historical agriculture land use. Remnant low-quality shrub-steppe habitat.



Photo 3. Zone 2 – historical industrial land use. Remnant low-quality shrub-steppe habitat is present.



Photo 4. Zone 2 – historical industrial land use. Remnant low-quality shrub-steppe habitat is present.



Photo 5. Zone 3 – Fourmile Canyon, area of greater native plant diversity and connectivity to undeveloped shrub-steppe habitats.



Photo 6. Zone 3 – Fourmile Canyon area of dense mature growth big sagebrush (*Artemisia tridentata*).

Community Development Department
102206 East Wiser Parkway
Kennewick, WA 99338

Planning Division
(509) 786-5612
Planning.department@co.benton.wa.us

HEM 1.23

MITIGATED DETERMINATION OF NON-SIGNIFICANCE

Proponent:
Interstate Concrete and Asphalt
Attn: Jana McDonald
PO Box 3366
Spokane, WA 99220

File No. EA 2026-017

Benton County has received a permit application for the following project:
A proposed Conditional Use Permit and SEPA Checklist for a commercial gravel mining, crushing, washing, processing, stockpiling, material sales, concrete and asphalt plant.

Project Location:
The project is located in the Plymouth area of unincorporated Benton County, approximately .55 miles south of SR 14 and Plymouth Industrial Road, Section 12, Township 05N, Range 27E. Parcel number 1-1257-201-2982-001.

Jurisdiction: Benton County, Washington

Lead Agency: Benton County Planning Division

Threshold Determination: The lead agency for this proposal has determined that it will not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c), provided that the following measures are taken to mitigate potential adverse impacts. Substantive authority to require mitigation is derived from WAC 197-11-660 and Benton County Code, Chapter 6.35.120. The decision was made after review of a completed environmental checklist, comments received from various agencies and other information on file with the lead agency. This information is available to the public on request.

Conditions/Mitigating Measures: See attached conditions. Benton County has received timely comments and determined that such conditions are necessary to mitigate specific adverse impacts.

Appeals: You may appeal this determination to the Benton County Planning Division at 102206 E Wiser Parkway, Kennewick, WA 99338, no later than Friday September 18, 2026, by written notice. The fee for a threshold determination appeal is $800.00. An appeal of the determination must be made in writing to the Benton County Planning Division and a public hearing will be scheduled and the appellant will be notified of the date, time, and place. You should be prepared to make specific factual objections. Contact the Planning Division to read or ask about the procedures for SEPA appeals.

SEPA Responsible Official: Damien Hooper
Position/Title: Planning Manager
Address: 102206 E Wiser Parkway, Kennewick, WA 99338.

Date: September 3, 2026

Damien Hooper, Planning Manager
Benton County Community Development Department

CONDITIONS/MITIGATION MEASURES
File No. EA 2026-008 – Interstate Concrete and Asphalt

Applicant: Interstate Concrete and Asphalt
Attn: Jana McDonald
PO Box 3366
Spokane, WA 99220

The environment threshold determination and conditions are based on an analysis of information contained in the file and the following documents.

1. Benton County, BCC Title 6.35 Environmental Policy (SEPA);
3. Benton County, BCC Title 11, Zoning;
4. Benton County Comprehensive Plan;
5. Benton County, BCC Title 15 Critical Area Ordinance;
6. Benton County, BCC Title 3 Building Code, Fire Code, and Road Standards; and
7. Regulations of the Washington State Department of Fish and Wildlife, Department of Transportation, Department of Ecology, Department of Natural Resources, and Department of Archaeology and Historic Preservation.

Findings:

1. Location:
   a. The project is located in the Plymouth area of unincorporated Benton County, approximately .55 miles south of SR 14 and Plymouth Industrial Road, Section 12, Township 05N, Range 27E. Parcel numbers 1-1257-201-2982-001, 1-1157-101-3428-001, 1-0257-100-0003-000, 1-0157-100-0002-004, and 1-1157-100-0001-003.

2. Scope of work:
   a. Applicant proposes to operate a commercial gravel mining, crushing, washing, processing, stockpiling, material sales, concrete and asphalt plant in the Growth Management Act Agricultural District and the Heavy Industrial Zoning District.

3. The applicant submitted the following materials for the SEPA review process:
   a. Project permit application consisting of a proposed conditional use permit for commercial gravel mining and related activities including possible concrete batching and asphalt production, dated April 3, 2026.
   b. SEPA Environmental Checklist dated April 3, 2026.
   c. Reclamation Plan prepared by JUB dated January 29, 2026.
   d. Critical Habitat Report- Shrubsteppe prepared by Towey Ecological Services dated March 30, 2026.
   e. Critical Areas Support Response prepared by Farallon Consulting dated July 30, 2026.
   f. Plymouth Site Zone 3 Mitigation Recommendation prepared by Farallon Consulting dated September 3, 2026.
   g. Cultural Resource Reports prepared by RLR Cultural Resources, LLC. dated April 3, 2024, February 14, 2024, July 14, 2025, Augst 8, 2025, and June 3, 2026.

4. Benton County, BCC Title 11, Zoning:
   a. The zoning designation for the project area is Growth Management Act Agricultural District (GMAAD) and Heavy Industrial Zoning District (HI).
   b. Sand and/or gravel pits, stone quarries, mining, crushing, stockpiling of mineral resources and similar uses for the development of natural resources extracted on-site are permittable uses in the GMAAD and HI Zoning Districts with a Conditional Use Permit.

5. Benton County Comprehensive Plan:
   a. The project area is designated Growth Management Act Agriculture and Rural Industrial in the Benton County Comprehensive Plan.

6. Benton County, BCC Title 15, Critical Area Ordinance:
   a. Upon completion of a review of BCC Title 15 and the Benton County Critical Area Maps, the project site does contain FEMA designated flood zones, wetlands, priority habitat areas and geologically hazardous areas, but does not contain critical aquifer recharge areas
   b. Wetlands: Riverine System.
   c. Critical Aquifer Recharge Area: None identified.
   d. Fish and Wildlife Habitat Conservation Area: Shrubsteppe habitat, and Ferruginous Hawk habitat.
   e. Frequently Flooded Areas: FEMA designated flood zones.
   f. Geologically Hazardous Areas: Steep slopes greater than 15% slope and liquefaction.

7. The following comment was submitted by the Washington State Department Archaeology and Historic Preservation on April 24, 2026:

   a. Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) and providing documentation regarding the above referenced project. As a result of our review, our professional opinion is that part of the project area has the potential to contain archaeological resources. The project is in an area determined to be at Very High- risk along Four Mile Canyon Creek. Further, there is a sensitive pre-Contact site in Four Mile Canyon 113m south of the Project Area, adding to the risk of archaeological resources being present. The scale of the proposed ground disturbing actions would destroy any archaeological resources present. Identification during construction is not a recommended detection method because inadvertent discoveries often result in costly construction delays and damage to the resource. Therefore, we recommend a professional archaeological survey with testing of the portion of the project area depicted in the attached map be conducted prior to ground disturbing activities. We also recommend continuing consultation with the Affected Tribes' cultural committees and staff regarding cultural resource issues.

      These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with Washington State law. Should additional information become available, our assessment may be revised.

      Thank you for the opportunity to comment on this project and we look forward to receiving the survey report. The survey report should be uploaded directly into the DAHP Online WISAARD system by the cultural resource consultant to expedite DAHP review. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports.
   b. For more information, please contact the Washington State Department Archaeology and Historic Preservation at (509) 783-1304.

8. The following updated comment was submitted by the Washington State Department Archaeology and Historic Preservation on July 6, 2026:

   a. Thank you for contacting the State Historic Preservation Officer (SHPO) and the Department of Archaeology and Historic Preservation (DAHP) with documentation regarding the above-referenced project. In response, we concur with the results and recommendations made in the report entitled "Cultural Resources Review and Inventory for the Agri-Northwest Industrial Park Project, Areas 2, 3, 5, and 6, Benton County, WA," (Wilde, Gallagher et al. 2024). specifically, we have made the following determinations of eligibility for the National Register of Historic Places (NRHP) based on the report findings:

      Archaeological Resources

      - Not Eligible for the NRHP but protected under RCW 27.53, and must be avoided: 45BN02498
      - Not Eligible for the NRHP: 45BN02390, 45BN02391, 45BN02392, 45BN02393

      Because no eligible resources were found within the area of effect during the survey we do not recommend further direct archaeological supervision of the project. However, if the boundary of the APE changes or encroaches on 45BN02498, the site must be avoided or an archaeological permit

must be applied for and granted prior to disturbance (RCW 27.53.090, .095). If the project boundary approaches the site boundary a temporary, high-visibility barrier fence must be installed at least 50' offset from the official site boundary. Failure to comply with RCW 27.53.090 can result in costly project delays and significant fines. We do recommend that a standard Inadvertent Finds Plan is followed during all ground disturbing activities.

Please note that the recommendations provided in this letter reflect only the opinions of DAHP. Any interested Tribes may have different recommendations. We appreciate receiving copies of any correspondence or comments from Tribes or other parties concerning cultural resource issues that you receive.

These comments are based on the information available at the time of this review and on behalf of the SHPO pursuant to Washington State law. Please note that should the project scope of work and/or location change significantly, please contact DAHP for further review.

b. For more information, please contact the Washington State Department Archaeology and Historic Preservation at (509) 783-1304.

9. The following comment was submitted by the Benton Clean Air Agency on April 14, 2026:
   a. It has come to our attention that you are reviewing a proposed project which will include a rock quarry, concrete and asphalt plant, for the above named applicant in Benton County, WA.

      Washington Administrative Code **(WAC) 173-400-110 New source review for sources and portable sources**, including the operations described above, may require:
      (2) Approval requirements.
      (a) A notice of construction application must be filed and an order of approval must be issued by the permitting authority prior to the establishment of any new source... (rock crusher, concrete and asphalt plant)

   b. Benton Clean Air Agency Regulation 1 requires that any rock crushing, concrete or asphalt facility must first file a Notice of Construction (NOC), submit the appropriate filing and engineering fees, and receive an approval to operate prior to operation of the source.

   c. For more information, please contact the Benton Clean Air Agency at (509) 783-1304.

10. The following comment was submitted by the Washington State Department of Transportation on April 29, 2026:
   a. The subject property is in the vicinity of State Route 14 (SR 14), a partially controlled limited access facility with a posted speed limit of 65 miles per hour. WSDOT has acquired all access rights to the highway. Access to the property is available via the Plymouth Industrial Road intersection at milepost 178.90 Rt. Direct access to SR 14 is prohibited.

   b. All loads transported on WSDOT rights-of-way must be within the legal size and load limits or have a valid oversize and/or overweight permit.

   c. It is the applicant's responsibility to keep and maintain SR 14 free of any of their debris. Any spilled material shall be promptly cleaned up at the applicant's expense.

   d. For more information, please contact the Washington State Department of Transportation at (509) 577-1635.

11. The following comment was submitted by the Washington State Department of Ecology on April 28, 2026:
   a. **Water Quality Program**
      The Sand and Gravel General Permit (SGGP) from the Department of Ecology (Ecology) regulates discharges of process water, stormwater, and water from mine dewatering into waters of the state associated with sand and gravel operations, rock quarries, and similar mining operations. The permit also covers concrete batch plant and hot-mix asphalt operations.

All new facilities and un-permitted existing facilities that intend to obtain coverage, and permitted existing facilities planning a significant process change must submit a complete and accurate Notice of Intent **(NOI).** The Permittee must submit the **NOI no** less than one hundred and eighty (180) days before beginning any activity that may result in the discharge of any pollutant.

To apply, go to Ecology's Sand and Gravel General Permit webpage. For technical assistance, contact Alex Barnes, Sand & Gravel General Permit Manager at alex.barnes@ecy.wa.gov or by phone at {509) 746-8415.

b. Shorelands and Environmental Assistance (SEA) Program

Thank you for the opportunity to review this project. The National Wetlands Inventory, USGS Topographic Maps, Aerial Photos, and the National Hydrography Dataset all indicate an intermittent or ephemeral stream occupying Fourmile Canyon. There is indication of distinct bands of vegetation that may indicate presence of wetlands. Prior to any ground disturbing activities that will impact this area we recommend that a Qualified Wetland Professional conduct a wetland determination and delineation following the Army Corps of Engineers Wetland Delineation Manual and Arid West Supplement and a wetland rating following the Washington State Wetland Rating Manual for Eastern Washington.

Please reach out to Ryan Anderson (509)379-1917 or ryan.anderson@ecy.wa.gov with any questions.

c. Spills Preparedness, Prevention and Response Program

A SPCC plan may be required if oils are stored onsite (diesel, asphalt, etc) (40 CFR 112). Please refer to those regulations for any requirements needed to be met in order to have aboveground storage tanks onsite. Describe the number of storage tanks planned, their capacity, and type of oil service each will have. Include whether or not they are horizontal or vertical tanks and shop built or field constructed.
Provide design code used to design and construct each tank.
Provide inspection code used to inspect each tank (API 653, STI SP00l, etc).
Provide details for secondary containment type(s) for the tanks.
Provide details for oil transfers will occur to supply each tank.

Thank you for considering our comments. If you have any questions or would like to respond to our comments, please contact Angela Deardorff-Zeigenfuse, Project Specialist with the Spills Program (360) 480-2263 or by email at angela.zeigenfuse@ecy.wa.gov.

d. Water Resources Program

In Washington State, prospective water users must obtain authorization from the Department of Ecology before diverting surface water or withdrawing ground water, with one exception. Ground water withdrawals for a project up to 5,000 gallons per day used for single or group domestic supply, up to 5,000 gallons per day used for industrial Benton County Planning Department purposes, stock watering, and for the irrigation of up to one-half acre of noncommercial lawn and garden are exempt from the permitting process. Water use under the RCW 90.44.050 exemption establishes a water right that is subject to the same privileges, restrictions, laws and regulations as a water right permit or certificate obtained directly from Ecology.

If you have any questions or would like to respond to these Water Resources comments, please contact Nathan Longoria at (509} 907-1752 or email at Nathan.Longoria@ecy.wa.gov. Ecology's comments are based upon information provided

e. Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

f. If you have any questions or would like to respond to these comments, please contact the

appropriate reviewing staff listed above.

12. The following comment was submitted by the Washington State Department of Fish and Wildlife on April 24, 2026:

    a. The Washington Department of Fish and Wildlife (WDFW) has reviewed relevant maps and documents for the proposed Interstate Concrete and Asphalt Commercial Plant (EA 2026-008, CUP 2026-009). Development on Parcel # 1-1257-201-2982-001/ 188322 S Plymouth Industrial Rd.

    The Critical Habitat Report breaks the areas down into three zones, but it is unclear as to what areas within each zone are proposed for work under the proposed permit. The Reclamation Plan shows Zone 1 as a mix of proposed and future work, Zone 2 as Phase 1 and 2 work, and Zone 3 as a mix of Phase 2, 3, and 4 work with a large area where no work is proposed at all. WDFW would like to ask for a clarification of the work areas as well as how the survey area was selected.

    The Critical Habitat Report states that "no critical fish and wildlife habitat was confirmed" for Zone 1 but then notes the presence of shrubsteppe overstory vegetation. Aerial photographs indicate that these small pockets of shrubsteppe vegetation may be occurring on the far eastern comer and near the power line area. WDFW would like clarification on these locations as well as if there is a plan to preserve them on site or mitigate for their loss.

    The Critical Habitat Report states that "no critical fish and wildlife habitat was confirmed" for Zone 2, but the photographs provided seem to potentially contain native shrubs and bunchgrasses. This seems to indicate the presence of vegetation that is consistent with WDFW's current definition of shrubsteppe habitat.

    The Critical Habitat Report notes the presence of shrubsteppe habitat in Zone 3 and specifically calls out the areas to the east of Fourmile Creek. The report states that this area is not designated for active mining, but the Reclamation Plan denotes this area as Phases 2-4. WDFW would like clarity on what work will be occurring in Zone 3.

    While the shrubsteppe habitat within the survey area may be impacted by ongoing activities in the area, it still provides functions and values that are that are utilized by PHS species. The project area is mapped as shrubsteppe habitat on WDFW's Priority Habitats and Species (PHS) maps as well as Ferruginous Hawk home range habitat. Additionally, there are observations of Burrowing Owl and Sage Thrasher a short distance to the west of the project area.

    WDFW recommends that The County and project developers work together to develop a mitigation plan in accordance with Benton County Code 15.02.220 to avoid impacts to and/or provide mitigation for any loss of shrubsteppe habitat functions and values on the site. WDFW would like to request a site visit to clarify if there is shrubsteppe habitat on the site and to discuss any proposed mitigation measures prior to the issuance of the Conditional Use Permit.

    Many birds local to our area as well as active nests are listed as "protected wildlife" under RCW 77.12.020(3). To avoid impacts to protected songbird species, WDFW recommends avoiding beginning any work on the site in the spring or summer nesting seasons (February 15 - July 31). If this is not possible for this project, please contact WDFW Area Habitat Biologist Troy Maikis (troy.maikis@dfw.wa.gov) to discuss potential survey, avoidance, and monitoring protocols.

    WDFW looks forward to working with Benton County on this project to ensure the best outcome for the county, its residents, and our local wildlife.

    b. For more information, please contact the Washington State Department of Fish and Wildlife at (509) 575-2740.

Conditions:
The applicant is responsible for providing the Planning Division with verification and approval of any listed condition. The applicant shall meet and comply with the following mitigation measures for this proposal.

1. Erosion control methods such as site grading and reclamation work must be implemented as described within the SEPA checklist.
2. Emission control methods such as application of water for dust suppression, and the use of baghouses must be implemented as described within the SEPA Checklist.
3. Water runoff must be contained in the mining area as described within the SEPA Checklist. If at any time there are to be discharges of process water, stormwater, and/or water from mine dewatering into waters of the state the applicant must obtain a Sand and Gravel General Permit (SGGP) from the Department of Ecology.
4. Applicant must comply with the approved reclamation plan and permit filed with the Washington State Department of Natural Resources, a copy of the approved SM-8 must be submitted to Benton County Planning.
5. Archaeological site 45BN02498 is in proximity the project site, but not currently within the permit area. This site must be avoided as required by the Washington State Department of Archaeology and Historic Preservation.
6. Impacts to habitat areas shall be mitigated as prescribed, including but not limited to the avoidance of Area 3A, as described in the Critical Habitat Report – Shrubsteppe prepared by Towey Ecological Services, dated March 30, 2026, as well as the Critical Areas Support Response prepared by Farallon Consulting, dated July 30, 2026 and Plymouth Site Zone 3 Mitigation Recommendations prepared by Farallon Consulting, dated September 3, 2026.
7. Comply with Benton Clean Air Agency Regulation 1 which requires any rock crushing, concrete or asphalt facility to file a Notice of Construction (NOC), submit the appropriate filing and engineering fees, and receive an approval to operate prior to operation of the source.
8. Comply with the Washington State Department of Transportation requirements for all loads transported on WSDOT rights-of-way while keeping and maintaining SR 14 free of any of their debris.
9. If oils are to be stored onsite the applicant must comply with the Department of Ecology regulations for a Spill Prevention, Control, and Countermeasure (SPCC) plan.
10. Applicant shall provide an updated site plan to the Benton County Planning Division showing areas of avoidance as described within the provided Critical Area Reports and Cultural Resources Studies.

Andrea Watts **HEM 1.24**

From: Erin Burgess <EBurgess@farallonconsulting.com>
Sent: Thursday, September 3, 2026 2:07 PM
To: Andrea Watts; Damien Hooper; McDonald, Jana M (CRH Americas Materials)
Cc: Rasmussen, Jens; Blagg, Wade (American Rock Products); Forester, Dallas; Winder, Calvin; Elizabeth A. Tellessen (eat@winstoncashatt.com); Lemons, Jeremiah K (CRH Americas Materials); Baker, Trevor C (Interstate Concrete and Asphalt)
Subject: [EXTERNAL] American Rock - Plymouth Site Zone 3 mitigation recommendation

Importance: High

Hi Damien,

Thank you for your time this week. I appreciate the need for more succinct language pertaining to Zone 3 of the Plymouth Site. Below is the recommendation for mitigation for Zone 3, concerning Fourmile canyon.

Per Benton County Code (BCC) Chapter 15.02.220 Mitigation Sequencing

1. **Avoiding the impact altogether by not taking a certain action or parts of an action;**

Zone 3 contains Fourmile Canyon and is zoned by Benton County for both agricultural and Heavy Industrial land use. As discussed in the July 30, 2026, letter in response to WDFW comments, Zone 3 presents a high composition of native vegetation and medium- to high-quality shrub-steppe habitat. Mitigation sequencing has been applied to Zone 3 by avoiding disturbance in areas of medium- and high-quality shrub steppe habitat. Figure 1 delineates the areas within Zone 3 as either Zone 3A and Zone 3B depending on the recommended impact avoidance strategy.

Zone 3A (green) represents the area of medium- to high-quality shrub-steppe habitat in Fourmile Canyon to be avoided. Thus, no mining-related disturbance will occur in this area. The habitat classification for this area of medium- to high-quality shrub steppe habitat is due to a denser shrub component along the eastern slopes, and connectivity to other areas of undisturbed shrub-steppe habitat. Additionally, the majority of this area is historically undisturbed. The exception to this is a preexisting road (blue line) and culvert in the northern region of the site that will not qualify for the area of avoidance. In total, the area of avoidance through Fourmile Canyon accounts for approximately 20 acres of shrub-steppe habitat.

Zone 3B (purple) represents areas of highly disturbed remnant shrub-steppe habitat outside of the canyon and that are excluded from the recommended avoidance area. These areas are dominated by non-native weedy species due to disturbance from neighboring land-uses (agriculture). Due to the preexisting degraded nature of these areas, it is our recommendation that mitigation for mining related disturbance not be required; recommendation for this area is to be reclaimed to agriculture land use. Zone 3B is approximately 55 acres in size.

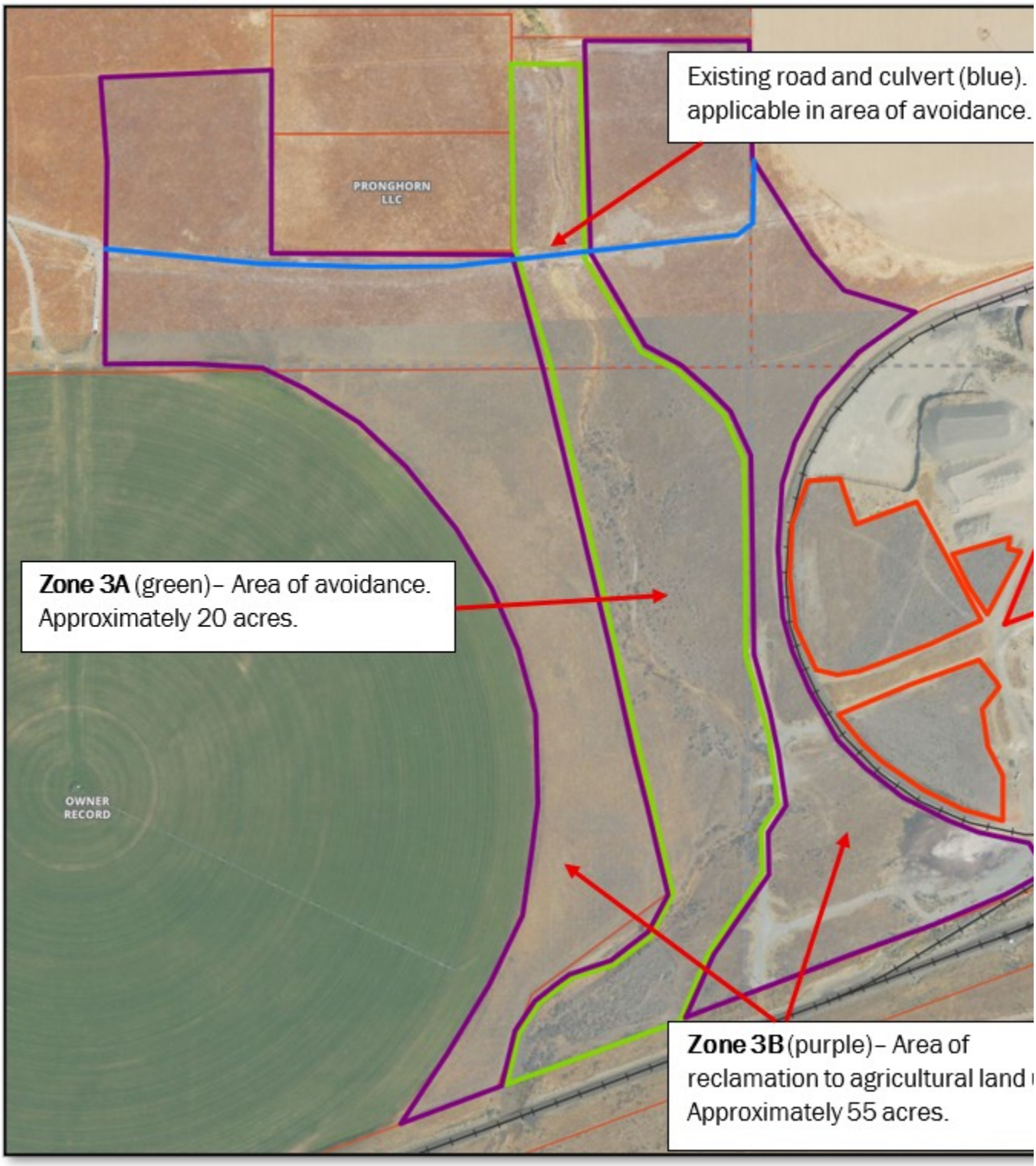


Figure 1. Zone 3 Mitigation Recommendation

Please let me know if you require anything further in order for us to make the October hearing deadline.

Thank you again for your time!

Best,
Erin

Erin Burgess, AWB®
Project Biologist

Grette Associates, *a division of Farallon Consulting*
151 S. Worthen Street, Suite 101
Wenatchee, WA 98801

Office/Cell: (509) 640-3283
Email: eburgess@farallonconsulting.com
Web: www.farallonconsulting.com



Notice: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

Jill James **HEM 1.25**

From: Troy Taylor
Sent: Wednesday, September 9, 2026 9:23 AM
To: Planning Department
Subject: RE: SEPA MDNS Issued - EA 2026-008 and CUP 2026-009 - Interstate Concrete and Asphalt

Building- comply with all applicable current Benton County codes.

From: Planning Department <Planning.Department@co.benton.wa.us>
Sent: Friday, September 4, 2026 10:45 AM
To: Brad O'Brien <Brad.Obrien@co.benton.wa.us>; Troy Taylor <Troy.Taylor@co.benton.wa.us>; Code Enforcement <code.enforcement@co.benton.wa.us>; chiefwatt@bcfd6.com; Gary Tiplady <Gary.Tiplady@co.benton.wa.us>; Cristina Woods <Cristina.Woods@co.benton.wa.us>; Shane Elledge <Richard.Elledge@co.benton.wa.us>; Dylan Krantz <Dylan.Krantz@co.benton.wa.us>; erin.hockaday@bfhd.wa.gov; jodeer@bfhd.wa.gov; Deana.chiodo@bfhd.wa.gov; jabrown@bentonrea.org; ccooke@bentonrea.org; john.lyle@bentoncleanair.org; deon.steichen@bentoncleanair.org; tyler.thompson@bentoncleanair.org; alex@futurewise.org; tim@futurewise.org; blm_or_sp_mail@blm.gov; jhoff@usbr.gov; envreview@gmail.com; sepa@dahp.wa.gov; separegister@ecy.wa.gov; r3planning@dfw.wa.gov; sepa.reviewteam@doh.wa.gov; sepacenter@dnr.wa.gov; scplanning@wsdot.wa.gov; enviroreview@yakama.com; ashleymorton@ctuir.org; careymiller@ctuir.org; cgarner@usbr.gov
Cc: Planning Department <Planning.Department@co.benton.wa.us>; Andrea Watts <Andrea.Watts@co.benton.wa.us>
Subject: RE: SEPA MDNS Issued - EA 2026-008 and CUP 2026-009 - Interstate Concrete and Asphalt

Good morning,

The Benton County Planning Department has prepared this MDNS in accordance with the State Environmental Policy Act Regulation file number #EA 2026-008 for Interstate Concrete and Asphalt. It is being circulated for additional review by all agencies with jurisdiction, since the original outreach was sent as a CONSULT. We appreciate your review of the MDNS, and please return your comments no later than September 18, 2026. The document related to this application can be found on the Department of Ecology Website following the link below:

SEPA record number 202603767, "Interstate Concrete and Asphalt Commercial Plant"

Have a wonderful weekend ahead!

Jill James **HEM 1.26**

From: ECY RE CRO SEPA Coordinator <crosepa@ecy.wa.gov>
Sent: Thursday, September 17, 2026 1:42 PM
To: Planning Department
Subject: [EXTERNAL] SEPA 202603767 ECY Comments for EA 2026-008, CUP 2026-009
Attachments: SEPA 202603767 ECY Comments.pdf

Greetings,

Attached is the Department of Ecology comment letter for the Interstate Concrete and Asphalt Commercial Plant.

Please share these comments with the applicant.

Thank you,
Amber Johnson (she/her)
SEPA/ERTS Coordinator
Department of Ecology, Central Region Office
Ph. 509-723-5677

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Central Region Office

1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

September 17, 2026

Andrea Watts
Benton County Planning Department
102206 E Wiser Parkway
Kennewick, WA 99338

RE: SEPA 202603767; EA 2026-008, CUP 2026-009

Dear Andrea Watts:

Thank you for the opportunity to comment on the Mitigated Determination of Nonsignificance for the Interstate Concrete and Asphalt Commercial Plant. We have reviewed the documents and have the following comments.

Water Quality Program

Please Note: A Construction Stormwater permit is relevant for a construction project. But is not needed to run a commercial project.

Project with Potential to Discharge Off-Site

If your project anticipates disturbing ground with the potential for stormwater discharge off-site, the NPDES Construction Stormwater General Permit is recommended. This permit requires that the SEPA checklist fully disclose anticipated activities including building, road construction and utility placements. Obtaining a permit may take 38-60 days.

The permit requires that a Stormwater Pollution Prevention Plan (Erosion Sediment Control Plan) shall be prepared and implemented for all permitted construction sites. These control measures must be able to prevent soil from being carried into surface water and storm drains by stormwater runoff. Permit coverage and erosion control measures must be in place prior to any clearing, grading, or construction.

In the event that an unpermitted Stormwater discharge does occur off-site, it is a violation of Chapter 90.48 RCW, Water Pollution Control and is subject to enforcement action.

More information on the stormwater program may be found on Ecology's stormwater website. Please submit an application or contact **Lloyd Stevens Jr.** at the Dept. of Ecology, (509) 571-3866, with questions about this permit.

Solid Waste Management Program

This project might need a solid waste handling permit regulated under WAC 173-350. Please contact your local County Health Department to find out what requirements pertain to the project, and whether a solid waste permit is required. If you believe your facility meets the criteria for permit exemption from WAC 173-350 please fill out a notice of intent form and submit it to Ecology. Solid Waste Forms may be found at Ecology's website. If you have any questions please contact the regional facilities specialist Cole Provence at Cole.Provence@ecy.wa.gov.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Sincerely,

Amber Johnson

Amber Johnson
SEPA Coordinator
Central Region Office
509-723-5677
crosepa@ecy.wa.gov

Jill James **HEM 1.27**

From:	Maikis, Troy (DFW) <Troy.Maikis@dfw.wa.gov>
Sent:	Friday, September 18, 2026 2:53 PM
To:	Planning Department; DFW R3planning; Andrea Watts
Cc:	Downes, Scott G (DFW); Didricksen, Daniel J (DFW)
Subject:	[EXTERNAL] RE: SEPA MDNS Issued - EA 2026-008 and CUP 2026-009 - Interstate Concrete and Asphalt
Attachments:	Interstate Concrete and Asphalt - EA 2026-008 MDNS Comment Letter WDFW.pdf

Thank you.

Please see WDFW's comments on the MDNS.

Troy Maikis
Area Habitat Biologist; Benton and Franklin Counties
Washington Department of Fish & Wildlife
2620 Commercial Ave
Pasco, WA 99301
(509) 312-8117

From: Planning Department <Planning.Department@co.benton.wa.us>
Sent: Thursday, September 17, 2026 9:56 AM
To: Maikis, Troy (DFW) <Troy.Maikis@dfw.wa.gov>; DFW R3planning <R3planning@dfw.wa.gov>; Planning Department <Planning.Department@co.benton.wa.us>; Andrea Watts <Andrea.Watts@co.benton.wa.us>
Cc: Downes, Scott G (DFW) <Scott.Downes@dfw.wa.gov>
Subject: RE: SEPA MDNS Issued - EA 2026-008 and CUP 2026-009 - Interstate Concrete and Asphalt

External Email

Hi Troy,

Please see attached both requested items. If you need anything additional, please let us know.

Best,

State of Washington
Department of Fish and Wildlife
2620 North Commercial Avenue, Pasco, WA 99301
Phone: (509) 312-8117, E-mail: Troy.Maikis@dfw.wa.gov

September 18, 2026

Andrea Watts
Community Development Dept., Planning Division
102206 E. Wiser Parkway
Kennewick WA 99338

Re: Interstate Concrete and Asphalt Commercial Plant - EA 2026-008, CUP 2026-009

The Washington Department of Fish and Wildlife (WDFW) has reviewed the Mitigated Determination of Non-Significance (MDNS) for the proposed Interstate Concrete and Asphalt Commercial Plant (EA 2026-008, CUP 2026-009) development on Parcel # 1-1257-201-2982-001/ 188322 S Plymouth Industrial Rd. WDFW submitted a letter on April 24, 2026 requesting clarification on the habitat quality within Zones 1 and 2, information about what, if any, work will be done in Zone 3, and for a mitigation plan to be prepared. WDFW received copies of the "Critical Areas Support Response" document and the "Plymouth Site Zone 3 Mitigation Recommendations" document on September 17, 2026.

WDFW would like to note that the Critical Areas Support Response document only contains a small portion of WDFW's definition of shrubsteppe; focusing only on shrub canopy. WDFW defines shrubsteppe as a nonforested vegetation type consisting of one or more layers of perennial bunchgrasses and a conspicuous but discontinuous layer of shrubs. The definition goes on to note that shrubsteppe disturbed by fire may lack some habitat components during periods of post-fire recovery (including shrub cover). The document incorrectly concludes that "based on (WDFW's) definition, shrub-steppe habitat is characterized by a cover of any of the aforementioned shrubs of more than 5%."

The Critical Areas Support Response document maps 20 acres of shrubsteppe habitat within Zone 2. This area has direct connectivity to larger areas of shrubsteppe habitat in all directions (although it is less preferable than undisturbed habitat, agricultural fields do provide permeability for many wildlife species to access the greater landscape, and a railroad track is not an impermeable barrier), as well as important water sources in Fourmile Canyon and the Columbia River. The document states that these "patches of habitat support reduced functions and values." Therefore, WDFW recommends mitigation of "equivalent or greater biological functions" as outlined in Benton County Code 15.14.040(e).

WDFW is unclear why the mapped area of shrubsteppe habitat in Zone 3 changed from 40 acres in the Critical Areas Support Response document to 20 acres in the Plymouth Site Zone 3 Mitigation Recommendations document. As aerial images provide evidence of agricultural activities in Parcel 111571000001003 to the west of Fourmile Canyon, WDFW is in agreement with the removal of this area from the mapped shrubsteppe in both documents. However, WDFW does not see any evidence provided in any of the reports to support the idea that the

areas to the east of Fourmile Canyon do not provide any of the functions and values associated with shrubsteppe habitat. These areas should not be considered to be "reclaimed to agriculture land use" as they have not historically been used for agricultural purposes

WDFW recommends the entirety of the 40 acre area of continuous shrubsteppe habitat in Zone 3, as mapped in the Critical Areas Support Response document, be preserved as a 2:1 mitigation for the loss of 20 acres of shrubsteppe habitat in Zone 2, as outlined in Benton County Code 15.02.220. If this is deemed not feasible, and The County deems it necessary to impact the portion of Zone 3 outside of Parcel 111571000001003 that is outlined in the Plymouth Site Zone 3 Mitigation Recommendations document, WDFW recommends that any disturbances be "reclaimed" not to agricultural lands but instead be re-seeded and monitored to ensure it achieves equivalent or greater habitat functions and values following the conclusion of the project. WDFW recommends a re-seeding and monitoring plan be in place prior to any disturbance on the site.

WDFW concurs with the Critical Areas Support Response document recommendation to conduct nesting bird surveys and implement nest protection measures as applicable prior to any work during the spring and summer nesting seasons.

WDFW appreciates the opportunity to provide input on this MDNS document and assist Benton County and Interstate Concrete and Asphalt to ensure the best outcome for the project, The County, its residents, and our local wildlife.

Sincerely,

Troy Maikis
Area Habitat Biologist; Benton and Franklin Counties
Washington Department of Fish & Wildlife
2620 Commercial Ave
Pasco, WA 99301
(509) 312-8117
Troy.Maikis@dfw.wa.gov

cc: Daniel Didricksen, WDFW Habitat Program Manager, Region 3, Yakima
Scott Downes, Fish & Wildlife Habitat Regional Land Use Lead, Region 3, Yakima

Andrea Watts

HEM 1.28

From: McDonald, Jana M (CRH Americas Materials) [redacted]
Sent: Wednesday, October 7, 2026 11:18 AM
To: Andrea Watts; Planning Department
Cc: Rasmussen, Jens; Blagg, Wade (American Rock Products)
Subject: [EXTERNAL] RE: EA 2026-008 Interstate Concrete Hold Letter

Andrea,

Please see below and let me know if you have any questions.

1) How many employees are proposed?
    a. 10-25 – Yes
2) What are the hours of operation?
    a. 6 am-8pm but up to 24/7 depending on market demands – This is correct, there may be market demands (jobs, customers, contracts, etc) that require work to be done outside of the 6am-8pm time frame.
3) How many times a year will you be blasting? There is no set schedule for blasting, any blasting will be done on an as needed basis dependent on if basalt material is encountered while mining.
4) How often will you be crushing rock? Initially, crushing will be done with a portable crusher anticipated to operate 4-6 months/yr and a wash plant that remain on site year-round and operate daily. It is anticipated that a permanent crusher may be installed in the future.
5) Will customers be coming to the site? Yes
6) Can you please provide a breakdown of the proposed structures? Proposed structures would be industrial in nature. A Crusher typically includes crushers, screens, conveyors, wash decks/wash screws, load out bunkers, control house, drive over scale, etc. A concrete batch plant typically includes batch plant, aggregate feed hoppers, silos, conveyors, dust collectors, baghouses, control house, etc. A Hot Mix Asphalt plant typically includes a drum dryer, silos, aggregate feed hoppers, conveyors, baghouse, etc. There may be a maintenance shop in the future.

Sincerely,

Jana McDonald, PE
Resource and Environmental Director – NW Region
Americas Materials | West Division

CRH Americas Materials, Inc.
PO Box 3366
Spokane, WA 99220-336

O +1 (509) 534-6221
C +1 (509) 220-3144
F +1 (509) 536-3051
E Jana.McDonald@na.crh.com

www.crhamericasmaterials.com

From: Andrea Watts <Andrea.Watts@co.benton.wa.us>
Sent: Tuesday, October 6, 2026 10:53 AM
To: McDonald, Jana M (CRH Americas Materials) [redacted]; Planning Department <Planning.Department@co.benton.wa.us>

Cc: Rasmussen, Jens [redacted]; Blagg, Wade (American Rock Products) [redacted]
Subject: RE: EA 2026-008 Interstate Concrete Hold Letter

Good morning,

As I am wrapping up the staff memo for next week's hearing I have a few operation questions. Some of these answers are in the EA Checklist I just would like to confirm everything is correct before we go to hearing.

1) How many employees are proposed?
    a. 10-25
2) What are the hours of operation?
    a. 6 am-8pm but up to 24/7 depending on market demands
3) How many times a year will you be blasting?
4) How often will you be crushing rock?
5) Will customers be coming to the site?
6) Can you please provide a breakdown of the proposed structures?

Many thanks,

Andrea Watts
Planning Supervisor
Benton County Community Development Department
Planning Division
102206 E. Wiser Pkwy, Kennewick, WA 99338
Andrea.watts@co.benton.wa.us
(509) 786-5612

From: McDonald, Jana M (CRH Americas Materials) [redacted]
Sent: Thursday, July 30, 2026 3:02 PM
To: Andrea Watts <Andrea.Watts@co.benton.wa.us>; Planning Department <Planning.Department@co.benton.wa.us>
Cc: Rasmussen, Jens [redacted]; Damien Hooper <Damien.Hooper@co.benton.wa.us>; Blagg, Wade (American Rock Products) [redacted]
Subject: [EXTERNAL] RE: EA 2026-008 Interstate Concrete Hold Letter

Andrea,

I have the Critical Areas Support Response to the WDFW comments for the Interstate Plymouth project. Please let me know if you have any questions or need anything else.

Sincerely,

Jana McDonald, PE
Resource and Environmental Director – NW Region
Americas Materials | West Division

CRH Americas Materials, Inc.
PO Box 3366
Spokane, WA 99220-3366

O +1 (509) 534-6221
C +1 (509) 220-3144
F +1 (509) 536-3051
E Jana.McDonald@na.crh.com

www.crhamericasmaterials.com

From: Andrea Watts <Andrea.Watts@co.benton.wa.us>
Sent: Friday, July 10, 2026 1:33 PM
To: McDonald, Jana M (CRH Americas Materials) [redacted]
Subject: RE: EA 2026-008 Interstate Concrete Hold Letter

Also attached is the findings document.

Andrea Watts
Planning Supervisor
Benton County Community Development Department
Planning Division
102206 E. Wiser Pkwy, Kennewick, WA 99338
Andrea.watts@co.benton.wa.us
(509) 786-5612

From: Andrea Watts
Sent: Friday, July 10, 2026 1:31 PM
To: McDonald, Jana M (CRH Americas Materials) [redacted]
Subject: EA 2026-008 Interstate Concrete Hold Letter

Andrea Watts
Planning Supervisor
Benton County Community Development Department
Planning Division
102206 E. Wiser Pkwy, Kennewick, WA 99338
Andrea.watts@co.benton.wa.us
(509) 786-5612

Community Development Department
102206 E Wiser Parkway
Kennewick, WA 99338

Planning Division
(509) 786-5612
Planning.Department@co.benton.wa.us

HEM 1.29

NOTICE OF OPEN RECORD HEARINGS

NOTICE IS HEREBY GIVEN that the following applications have been proposed to the Hearings Examiner for Benton County, Washington. An open public record hearing for the below stated applications will be held on **October 16, 2026,** at 10 a.m. via in person and virtual meeting format in the Commissioners Room on the third floor of the Courthouse, 620 Market Street, Prosser WA. To find information on attendance options, please visit https://tinyurl.com/BCHearingExaminerPublicNotice.

CONDITIONAL USE PERMIT – CUP 2026-009 The applicant, Interstate Concrete and Asphalt, is requesting a conditional use permit for a commercial gravel mining, crushing, washing, processing, stockpiles, sales of material, concrete and asphalt plants. The project is located at 188322 S Plymouth Industrial Road, Plymouth, WA 99346.

CONDITIONAL USE PERMIT – CUP 2026-0015 The applicant, Matthew Massie, is proposing to convert an existing 1,560 sq. ft. single family dwelling into an 800 sq. ft. detached accessory dwelling unit within a 2,360 sq. ft. shop on a parcel with plans for a new 3,000 sq. ft. single family residence. The project is located at 100506 E Bastian PR SE, Kennewick, WA 99338.

CONDITIONAL USE PERMIT – CUP 2026-0016 The applicant, Cliff Thorn Construction, for Kevin Schilling, is proposing to construct an 800 sq. ft. detached accessory dwelling unit on a parcel while also constructing a new 2,379 sq. ft. single family residence. The project is located at 21518 S 2021 PR SE, Kennewick, WA 99337.

Questions can be directed to the Planning Division at 509-786-5612 or at planning.department@co.benton.wa.us. Written comments regarding the above applications must be received by **October 13, 2026** via email or submitted to the Planning Division office at the Public Services Building, 102206 E Wiser Parkway, Kennewick, WA 99338. Any information submitted to Benton County is subject to the public records disclosure laws for the State of Washington (RCW Chapter 42.17) and all other laws that may require the release of the documents to the public.

No individual with a disability shall be denied the benefit of participating in such meetings. If you wish to use auxiliary aids or require assistance to comment at a public meeting, please contact the Benton County Planning Division at least ten days prior to the meeting date to make arrangements for special needs.

Dated this September 25, 2026

PUBLICATION DATE: September 30, 2026

SUSAN E. DRUMMOND
Benton County Hearings Examiner

Andrea Watts – Planning Supervisor
Community Development Department