

Draft Memorandum

To: Greg Wendt, Damien Hooper, Benton County Planning Division

From: Adam Cares, AC Geo, and Ben Floyd, *White Bluffs Consulting*

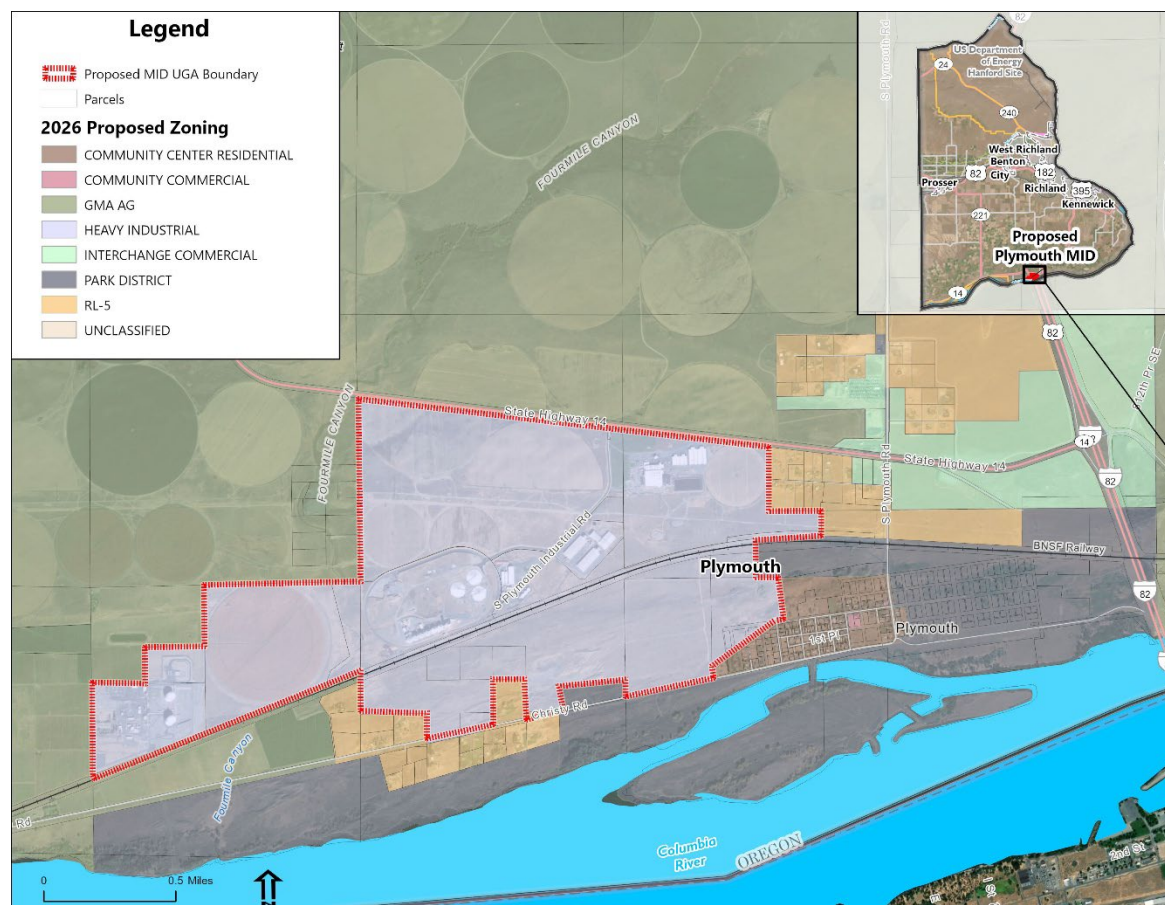
Date: September 9, 2026

Re: Major Industrial Development Site Suitability – Addendum to Industrial Lands Inventory Memorandum

Purpose

This addendum supplements the Industrial Lands Inventory Memorandum completed to support Benton County's 2026 Comprehensive Plan periodic update. The purpose of this addendum is to document in one location how state requirements are being met through the proposed 1,297-acre industrial development site near Plymouth under the requirements for a Major Industrial Development (MID) established by RCW 36.70A.365. The proposed Plymouth MID Urban Growth Area (UGA) is shown in Figure 1 below.

Figure 1: Proposed Plymouth MID Area

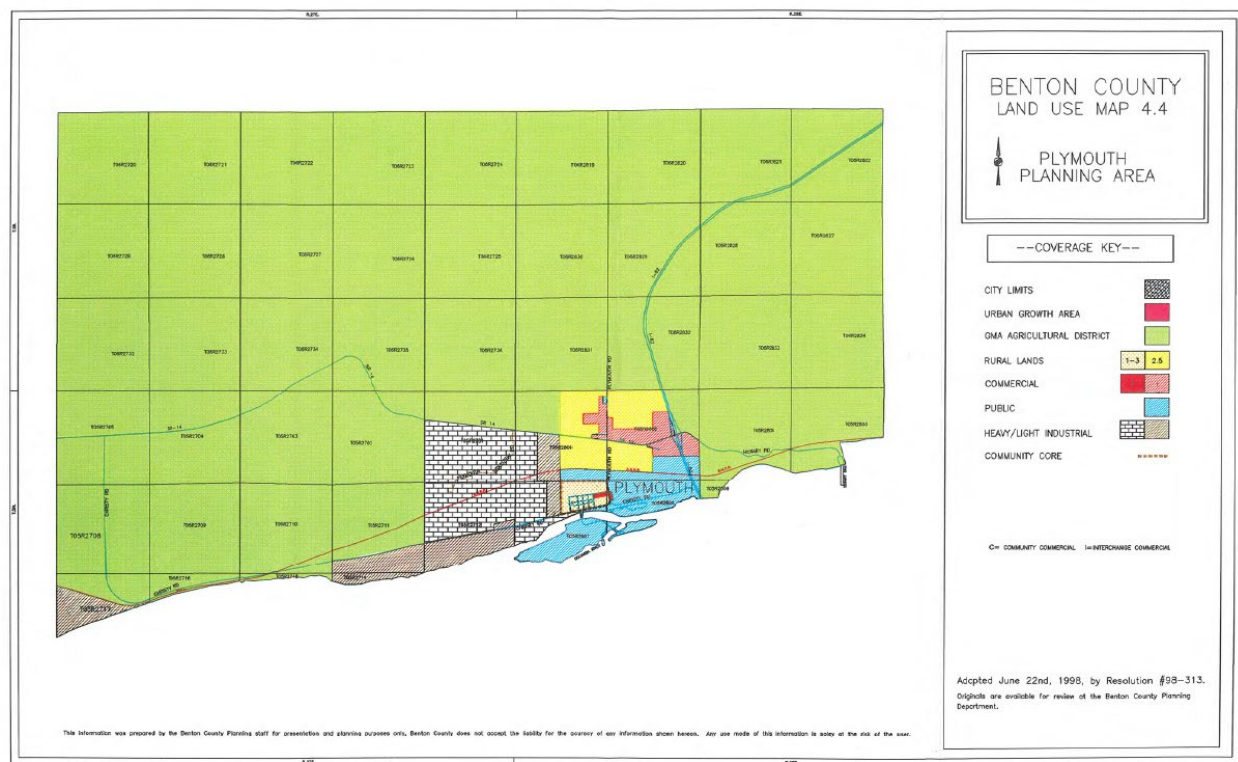


The Industrial Lands Inventory Memorandum evaluated the overall supply and distribution of industrially designated lands within Benton County and the broader region and led to the MID identification for Plymouth and adding more industrial lands (with some removals as well) in this part of the County. This addendum builds upon that analysis by more specifically documenting how the Plymouth area is suitable for the proposed MID UGA, as required by RCW 36.70A.365, and by addressing in a county-wide review the other statutory criteria for approval of an MID outside existing UGAs (which include the city limits of each city plus associated UGAs).

Site Background

Plymouth has been planned for and experienced large-scale industrial development for several decades. The 1998 Benton County Comprehensive Plan designated approximately 1,628 acres in Plymouth for industrial use, including approximately 988 acres of Heavy Industrial and 640 acres of Light Industrial, as shown in the Plymouth area land use map from the 1998 Comprehensive Plan shown in Figure 2 below. This designation encapsulated existing industrial development, such as the grain elevators and storage facilities and rail loop, and also has supported additional industrial development, including the recently completed corn flaking facility and controlled atmosphere onion storage facilities. Additional development is planned by Ag Reserves, Inc., the primary landholder in the area.

Figure 2: Plymouth Land Use Map from 1998 Comprehensive Plan



As noted in the Industrial Lands memo, Plymouth is well suited for large-scale industrial and agricultural processing uses due to its proximity to large commercial farming operations connected by farm-to-market roads, existing rail and highway access, and proximity to water supply and utilities with extensive capacity and the major industrial and freight infrastructure in Oregon. These characteristics also support Plymouth's suitability for natural resource-based industries that depend on proximity to agricultural lands and associated processing, utilities and transportation infrastructure, consistent with RCW 36.70A.365.

MID Designation Criteria

Per RCW 36.70A.365(1), a Major Industrial Development (MID) is a master planned location for a specific manufacturing, industrial, or commercial business that either:

1. Requires a parcel of land so large that no suitable parcel is available within an existing Urban Growth Area (UGA); or
2. Is a natural resource-based industry requiring a location near agricultural, forest, or mineral resource land upon which the industry is dependent.

The proposed Plymouth MID meets both qualifying criteria. The operation is natural resource-based and depends on proximity to the large-scale agricultural production surrounding Plymouth for efficient movement of crops to storage, processing, and transportation facilities. The facility also requires a large, contiguous industrial site to accommodate a planned rail loop expansion. The planned rail loop expansion and additional related facilities identified in the site's 10-year development plans encompass approximately 850 acres.



In considering an MID designation, the County is required to evaluate whether the identified industrial needs can be accommodated in existing UGAs, which include both the unincorporated UGA and the incorporated City limits. To complete this evaluation, the County analyzed industrially zoned lands within each UGA to determine whether a site of sufficient size and comparable suitability is available to accommodate the proposed development.

The analysis built on the County's earlier industrial lands inventory, which inventoried industrially zoned parcels and categorized them by development status, including vacant, underutilized, and developed lands, while also identifying mapped critical area constraints. The supplemental analysis further screened industrial lands within UGAs based on contiguous developable acreage, proximity to agricultural production, multimodal transportation access, utility access, farm-to-market road access, and mapped development constraints.

Figure 3 shows the industrial parcels included in the analysis, and the map figures in Appendix A provide additional detail for each jurisdiction. Table 1 compares the proposed MID site with industrial land available within the existing UGAs. Additional documentation of site characteristics is included in Appendix A.

Figure 3: Industrial Development Site Suitability Analysis Sites

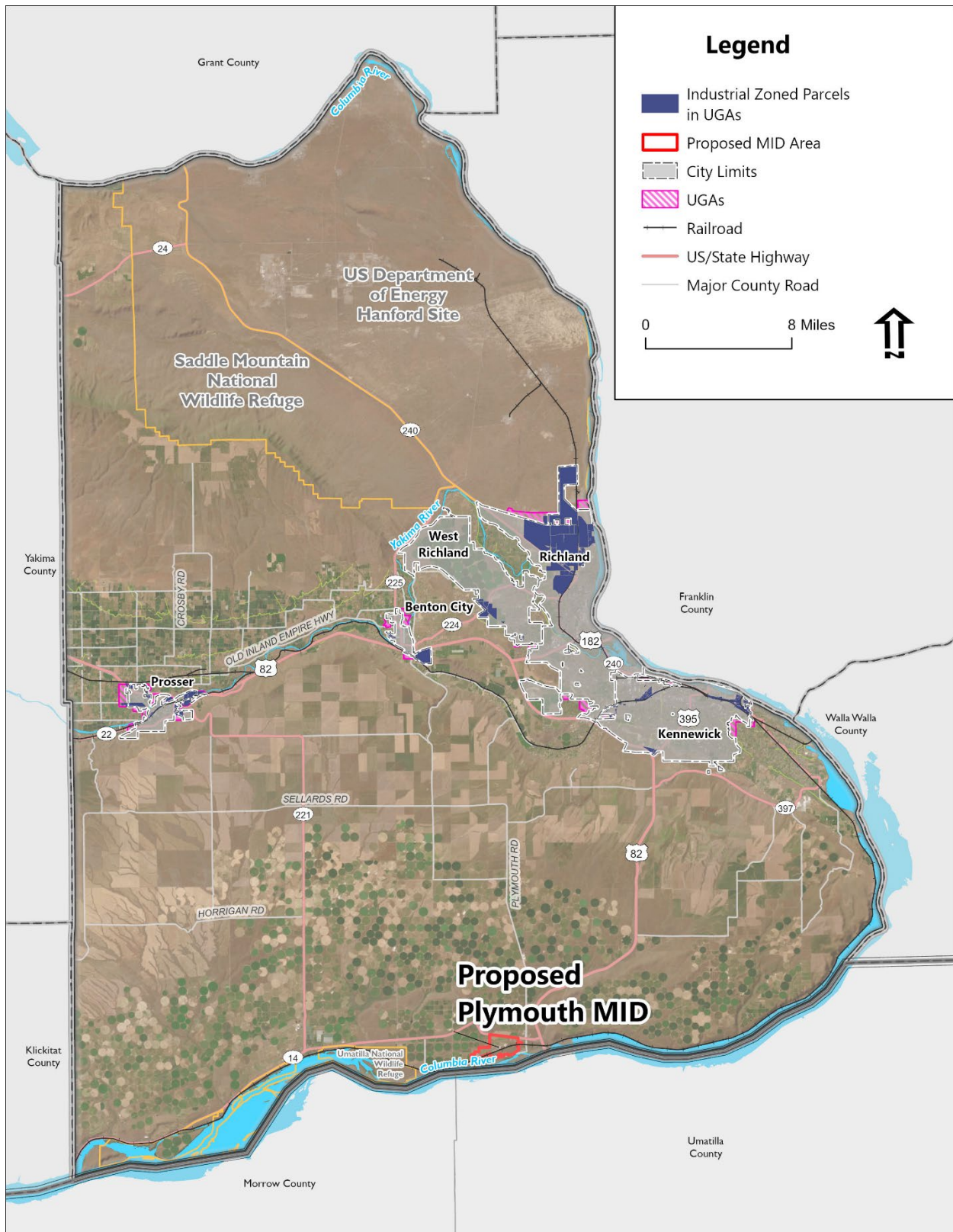


Table 1: MID Industrial Lands Comparison Summary

Area	Max Acres Under Common Ownership	Proximity to Large Farms	Multimodal Transport Access	Farm to Market Road Access	Sufficient Acreage	Notes
Plymouth MID Site	940	●	●	●	●	Meets all criteria with no major constraints.
Richland	1,017		●		●	Large contiguous industrial ownership exists, but the largest are owned by the City of Richland or Port of Benton and are planned to accommodate North Richland/Hanford-related industrial, research, technology, energy, and other regional employment uses. The sites lack proximity to large-scale agricultural production and farm-to-market road access. The two largest City sites also contain substantial mapped habitat constraints.
Kennewick	17.5	○	●			All contiguous ownerships are under 20 acres. Most sites are substantially affected by geohazard, shoreline, wetland, or floodplain constraints, and one of the largest ownerships is associated with active railroad operations.
West Richland	167	○				Largest contiguous ownership is approximately 167 acres, well below the acreage required for the proposed MID. Mapped critical-area constraints are relatively limited.
Benton City	212	●	●	●		Largest contiguous ownership is Washington DNR land and includes substantial mapped geohazard areas. Available contiguous acreage is well below the site need.
Prosser	40	●	●	○ ¹		No contiguous ownership exceeds approximately 40 acres. Several of the largest sites are substantially affected by Priority Habitat/Biodiversity Corridors, geologic hazards, shoreline, and floodplain constraints. Adjacent Prosser Wine and Food Park at larger contiguous site not compatible with heavy industrial use.

● = criterion met. ○ = criterion partially met. Blank = criterion not met.

Notes:

1. Farm to market road access exists but would require travel through residential areas.
2. Inventory includes land within incorporated cities and surrounding UGAs



The screening identifies the Plymouth MID site as the only candidate area that meets all evaluated suitability criteria. It provides approximately 940 acres under common ownership, is surrounded by farming operations that it directly supports, has access to existing road, water supply, utilities and rail infrastructure, and is served by farm to market roads that avoid impacts to urbanized areas. No other area has enough acreage combined with the agricultural proximity and transportation access required for the proposed MID.

Richland

Richland contains the largest contiguous industrial ownerships identified outside Plymouth. Several City- and Port-owned areas range from approximately 440 acres to more than 1,000 acres. However, portions of the largest sites are substantially affected by mapped Priority Habitat/Biodiversity Corridor areas. Additionally, North Richland industrial lands are oriented toward development associated with the Hanford Site, research and technology, energy, advanced manufacturing, and other regional industrial uses. They lack the proximity to large-scale agricultural production and farm-to-market road access that are central to the proposed MID. Vacant and underutilized industrial lands within the unincorporated Richland UGA are also limited to the Hanford site and are largely in federal government ownership.

Kennewick

Kennewick and its UGA contain relatively small and fragmented industrial ownership. The largest contiguous areas within the city are all less than 20 acres, including private and railroad-owned lands. Industrial lands within the UGA include geologic hazard, shoreline, wetland, and floodplain constraints. No site provides sufficient contiguous acreage for the proposed MID.

West Richland

West Richland contains a relatively large private industrial ownership of approximately 167 acres, along with several ownerships of approximately 40 acres. These sites have relatively limited mapped critical area constraints compared with many other areas evaluated. However, even the largest contiguous ownership is substantially smaller than the acreage needed for the proposed MID and lacks adequate transportation infrastructure and access.

Benton City

Benton City and its UGA do not contain sufficient contiguous industrial land to support the proposed MID. The largest ownership is approximately 212 acres of state-owned land, about one-third of which is affected by mapped geologic hazards. The next-largest publicly owned site is approximately 58 acres, and private ownerships are much smaller. No site approaches the acreage required for the proposed MID.

Prosser

Prosser is relatively well situated in relation to agricultural production, but no contiguous ownership approaches the acreage needed for the proposed MID.

Prosser and its UGA contain several contiguous industrial ownerships of approximately 20 to 40 acres. Some are substantially affected by mapped habitat, geologic hazard, shoreline, floodplain, and wetland constraints. Industrial lands owned by the Port of Benton surrounding the Prosser Airport are generally only appropriate for lighter industrial and airport-related uses. Other parcels along the south side of Wine Country Road are adjacent to the existing Prosser Wine and Food Park and residential areas and are not compatible with more intensive industrial uses.



In addition to the UGA land inventory and suitability finding addressed above, RCW 36.70A.365(2) establishes the following criteria:

a) New infrastructure is provided for and/or applicable impact fees are paid.

Response: Necessary transportation, rail, utility, and site infrastructure will continue to be provided as development occurs, funded primarily by Ag Reserves, and applicable impact fees would be paid, if required.

b) Transit-oriented site planning and traffic demand management programs are implemented.

Response: Site planning will incorporate transportation demand management measures appropriate to the location and workforce, including ridesharing, vanpooling, or similar strategies.

c) Buffers are provided between the major industrial development and adjacent nonurban areas.

Response: Appropriate setbacks, landscaping, or other buffers will be required where industrial development adjoins nonurban lands. Existing agriculture and open space lands largely surround the MID.

d) Environmental protection including air and water quality has been addressed and provided for.

Response: Environmental impacts will be addressed through SEPA review, mitigation sequencing (with emphasis on avoidance and minimization strategies) and applicable County, state, and federal permitting requirements to protect air and water quality.

e) Development regulations are established to ensure that urban growth will not occur in adjacent nonurban areas.

Response: Designation of the MID boundary will confine development to the designated MID site and prevent expansion into surrounding rural and agricultural lands. The County is introducing language into the comprehensive plan and development regulations to clarify that the existing rural industrial land use designation and corresponding Heavy and Light Industrial zones located in other parts of the County cannot be further expanded in the County rural areas.

f) Provision is made to mitigate adverse impacts on designated agricultural lands, forestlands, and mineral resource lands.

Response: The MID is intended to support surrounding GMA Agriculture-designated lands and associated agricultural operations through providing opportunity for additional processing, storage, and transportation facilities and infrastructure. The rationale for redesignating portions of the site from GMA Agriculture, which also allows agriculture-related industrial development) is documented in the Agricultural Lands Redesignation Memorandum (Comprehensive Plan Volume II, Appendix F), its Addendum (Appendix G), and the Industrial Lands Analysis (Appendix I). These analyses describe the site-specific basis for the redesignation, including the localized need for industrial land that can directly support surrounding large-scale agricultural production, the operation's need for substantial contiguous acreage, and the importance of proximity to farm-to-market roads, water supply, utilities, rail, and other transportation infrastructure.

g) The plan for the major industrial development is consistent with the County's development regulations established for protection of critical areas.

Response: The MID site contains limited critical area extent in comparison to other available sites within existing UGAs. Development within the MID will remain subject to Benton County's critical areas regulations, including its mitigation sequencing and encouragement of onsite protection strategies, prior to seeking offsite mitigation. Any impacts to shrubsteppe habitat at the site will be avoided or mitigated consistent with the County's Critical Areas Ordinance and Shrubsteppe Mitigation Program (Comprehensive Plan Volume II, Appendix N). Ag Reserves, Inc., is aware they will need to offset for critical area impacts and would employ avoidance and minimization strategies in site planning, and where impacts are not able to be avoided, they have identified other potential properties for offsite mitigation. The anticipated impacts associated with the MID are evaluated in the 2026 Comprehensive Plan Update Final EIS.

Additionally, As part of the Comprehensive Plan Update, approximately 367 acres of industrially designated land adjacent to the proposed MID site and owned by the U.S. Army Corps of Engineers are being redesignated to Public. This change would permanently protect adjacent lands with higher habitat value while directing future industrial development toward areas that are already disturbed or developed, or have lower quality habitat. The redesignation would preserve open space, shrubsteppe, and shoreline habitat consistent with the Open Space Memorandum in Comprehensive Plan Volume II, Appendix M.

APPENDIX A:

ANALYSIS AREA MAPS & INVENTORY TABLE

Figure A- 1: Richland Industrial Lands

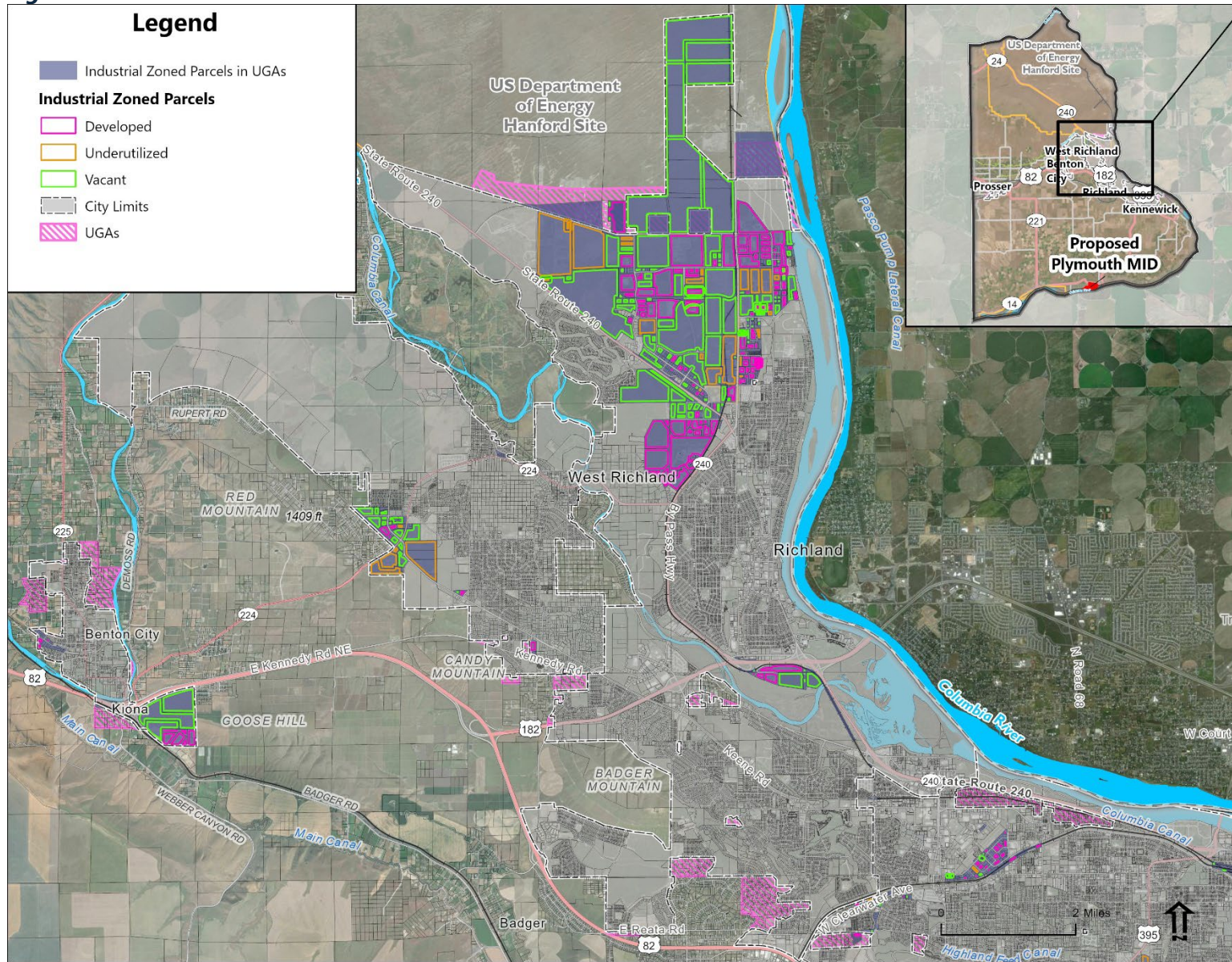


Figure A- 2: Kennewick Industrial Lands

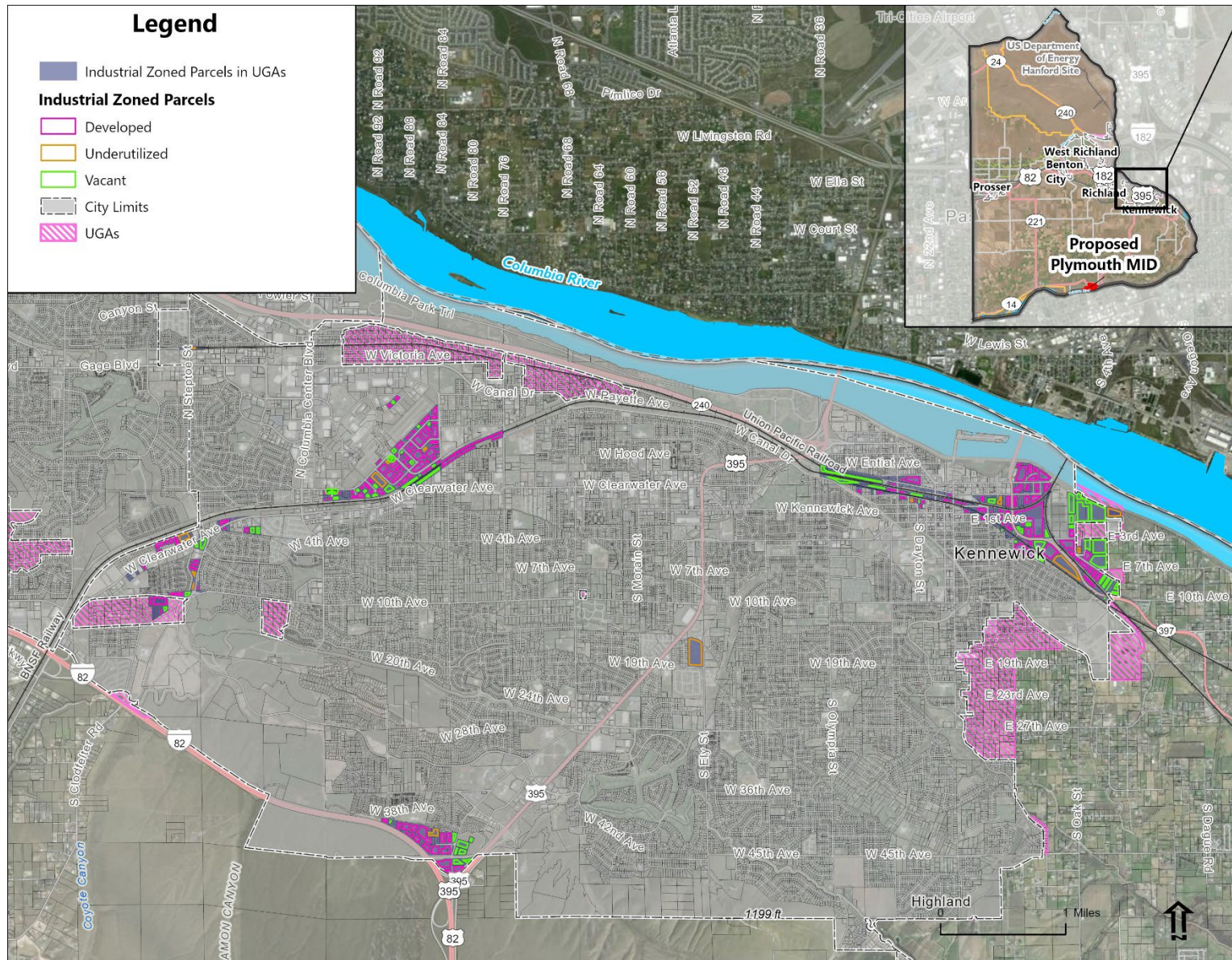


Figure A- 3: West Richland Industrial Lands

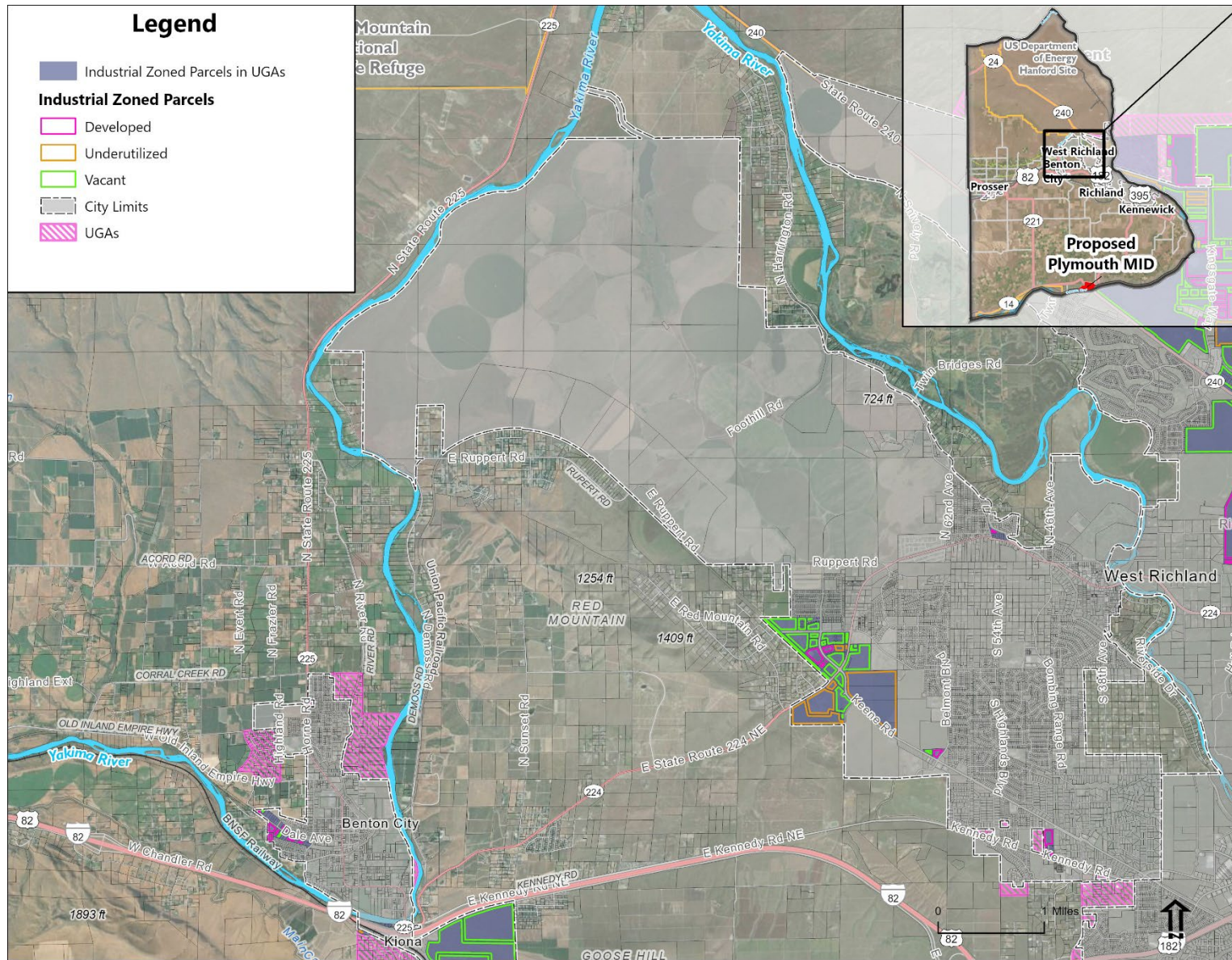
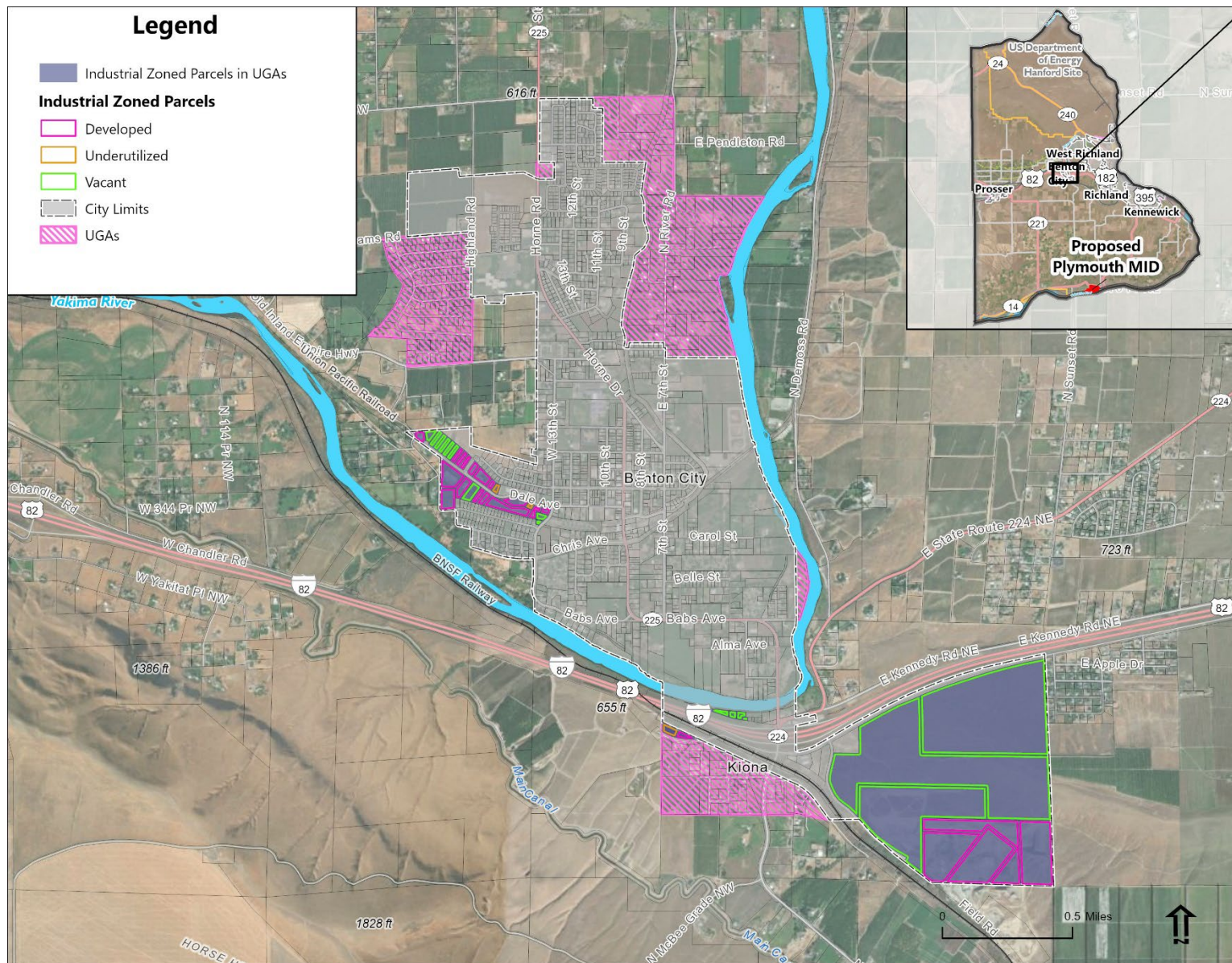


Figure A- 4: Benton City Industrial Lands



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Table A-1: Largest 3 Industrial Land Ownership Areas by Jurisdiction

Jurisdiction	Contiguous Acres Rank	Owner	Gross Acres	Ownership Type	Mapped Critical Area Overlap
Plymouth	—	Ag Reserves, Inc. (primary landholder)	940 (1,295.3 gross)	Private	Geohazard: 26 acres (2.7%) Wetlands: .28 acres (.03%) The property contains shrubsteppe (as flagged via WDFW PHS Shrubsteppe data). Shrubsteppe will be protected through onsite preservation planned for some areas, while others will be mitigated through the Benton County shrubsteppe mitigation bank.
Richland	1	City of Richland	1016.9	Public Agency	Geohazard: 41.4 ac (4%) Priority Habitat/Biodiversity Corridor: 301.6 ac (30%)
	2	City of Richland	792.7	Public Agency	Geohazard: 40.5 ac (5%) Priority Habitat/Biodiversity Corridor: 791.9 ac (100%)
	3	Port of Benton	441.2	Port District	Geohazard: 12.1 ac (3%) Priority Habitat/Biodiversity Corridor: 16.2 ac (4%) Wetlands: 0.1 ac (0%)
Richland UGA	1	United States of America	3.0	Public Agency	Priority Habitat/Biodiversity Corridor: 3.0 ac (100%)
	2	United States of America	2.3	Public Agency	Geohazard: 0.3 ac (14%) Priority Habitat/Biodiversity Corridor: 2.3 ac (100%)
	3	United States of America	2.3	Public Agency	Geohazard: 0.0 ac (2%) Priority Habitat/Biodiversity Corridor: 2.3 ac (100%)
Kennewick	1	Reese Concrete Products	17.5	Private	None mapped
	2	DH Land LLC	16.8	Private	Geohazard: 16.8 ac (100%)
	3	BNSF Railway Company	16.0	Private	Geohazard: 1.6 ac (10%)

Kennewick UGA	1	A + Plus Quality Insulation INC	5.8	Private	Geohazard: 5.8 ac (100%) Shorelines: 1.2 ac (21%) Wetlands: 1.1 ac (19%)
	2	Port of Kennewick	1.6	Port District	Floodplain: 1.6 ac (100%) Wetlands: 0.0 ac (3%)
	3	Isquierdo Moy & Isquierdo Elida Carolina	1.5	Private	Floodplain: 0.8 ac (54%) Geohazard: 0.3 ac (17%)
West Richland	1	7HA Family LLC	167.3	Private	Geohazard: 5.8 ac (3%)
	2	7HA Family LLC	42.1	Private	None mapped
	3	City of West Richland	40.0	Public Agency	Geohazard: 1.0 ac (3%)
Benton City	1	State of WA Dept of Natural Resources	212.4	Public Agency	Geohazard: 71.4 ac (34%)
	2	United States of America	57.5	Public Agency	Geohazard: 10.0 ac (17%)
	3	4H Development LLC	3.8	Private	Geohazard: 2.3 ac (60%) Wetlands: 0.1 ac (3%)
Benton City UGA	1	Willard LLC	1.3	Private	Geohazard: 0.7 ac (52%)
Prosser	1	Phelps Billy	39.8	Private	Geohazard: 19.7 ac (49%) Priority Habitat/Biodiversity Corridor: 37.4 ac (94%)
	2	Port of Benton	21.4	Port District	None mapped
	3	Shovel Ready 3 LLC	19.5	Private	Geohazard: 8.5 ac (44%)
Prosser UGA	1	Hobbs John R & Jill E	39.3	Private	Floodplain: 7.4 ac (19%) Geohazard: 33.3 ac (85%) Shorelines: 10.7 ac (27%) Wetlands: 3.9 ac (10%)

	2	Phelps Billy G & Phyllis J	30.4	Private	Floodplain: 0.0 ac (0%) Geohazard: 30.1 ac (99%) Shorelines: 6.6 ac (22%) Stream Buffer (100 ft): 0.0 ac (0%)
	3	Rediske Earl E	21.5	Private	None mapped