

# DRAFT Memorandum

To: Michelle Mercer, Greg Wendt, Benton County Planning Division

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

Date: June 11, 2025

Re: Energy Overlay Zoning

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## Introduction

Benton County is amending its Comprehensive Plan through a 2026 Periodic Update process. As part of the update, Benton County requested a review of land use considerations related to renewable energy facilities. Findings from this review will be incorporated into the Land Use and Rural elements of the plan and County development regulations, as applicable.

Benton County has experienced significant interest in utility-scale renewable energy development over the past several years. The siting of these facilities merits careful planning as the County seeks to protect valuable farmland, sensitive habitats, and the health, safety, and quality of life of local communities. This memorandum provides a review of relevant spatial data and recommends development regulations and zoning language to promote compatible siting for solar and wind facilities in Benton County. While the analysis focuses on renewable energy, findings may also inform compatible siting for other forms of energy development in the future by identifying lower conflict opportunity areas.

## Background

Washington State has enacted comprehensive policies to transition toward renewable energy such as wind and solar. The Clean Energy Transformation Act (CETA)<sup>1</sup> mandates that electric utilities achieve carbon-neutral electricity by 2030, and supply 100% renewable or non-emitting electricity by 2045. Additionally, the Energy Independence Act (RCW 19.285.040) requires large utilities to meet specific renewable energy targets.

## Solar Energy

The National Renewable Energy Research Lab Solar Resource Map indicates Benton County has some of the highest solar energy resources in the State of Washington.<sup>2</sup> Solar or photovoltaic (PV) cells convert sunlight directly into electricity. Solar cells are connected in panels or modules, which can be used individually or connected in arrays. Solar energy applications can range from small scale projects

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<sup>1</sup> Washington State Legislature. (2019). Senate Bill 5116-S2: Clean Energy Transformation Act.

<sup>2</sup> NREL, 2018 [Solar Irradiance Map](#)

with one or two panels to large solar power facilities that span thousands of acres. The US Energy Information Administration forecasts that US solar generating capacity will grow by 325% to 1019% by 2050.<sup>3</sup> Benton County Code currently categorizes solar development into “major” and “minor” facilities.

From Benton County Code – BCC 11.03.010:

**"Solar Power Generator Facility, Minor"** means the use of solar panels to convert sunlight directly or indirectly into electricity. Solar power generators consist of solar panels, charge controllers, inverters, working fluid system, and storage batteries. Minor facilities are sited on the power beneficiary premises, are intended primarily to offset part or all of the beneficiary’s requirements for electricity/gas, and are secondary or accessory to the beneficiary’s use of the premises. BCC 11.03.010(169).

**"Solar Power Generator Facility, Major"** means the use of solar panels to convert sunlight directly or indirectly into electricity. Solar power generators consist of solar panels, charge controllers, inverters, working fluid system, and storage batteries. Major facilities are developed as the primary land use for a parcel on which it is located and does not meet the siting criteria for a minor facility in BCC 11.03.010(168). BCC 11.03.010(168).

## Wind Energy

Wind energy refers to the process of harnessing the kinetic energy of wind to generate electricity using wind turbines. Maps and data from the National Renewable Energy Laboratory indicate that portions of Benton County have moderately high wind speeds (6-8 miles per hour).<sup>4</sup> The Nine Canyon Wind Project is an existing wind farm located in the Jump Off Joe area of Benton County, south of Kennewick, with 63 wind turbines with a maximum generating potential of 95.9 MW. A second large-scale wind project proposal, the Horse Heaven Wind Farm, proposes up to 244 wind turbines (along with two solar facilities). The proposal was approved by Governor Jay Inslee in November 2024. The US Energy Information Administration forecasts that US wind generating capacity will grow by about 138% to 235% by 2050, which is significantly less than forecast solar growth.

Benton County Code currently defines wind turbines and wind turbines farms and applies turbine height thresholds to define allowable and conditionally permitted uses.

From Benton County Code – BCC 11.03.010 - Definitions:

**"Wind Turbine"** means a machine with a turbine apparatus (rotor blades, nacelle and tower) capable of producing electricity by converting the kinetic energy of wind into rotational, mechanical and electrical energy; provided, the term does not include electrical distribution or transmission lines, or electrical substations. BCC 11.03.010(192)

**"Wind Turbine Farms"** means two or more wind turbines on one parcel. BCC 11.03.010(193).

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<sup>3</sup> US Energy Information Administration [Annual Energy Outlook](#) (2023).

<sup>4</sup> NREL Wind Resource Database <https://wrd.b.nrel.gov/data-viewer>

From Benton County Code - BCC 11.33.030 - Allowable Uses:

(q) No more than one (1) wind turbine and related support structures and other improvements per parcel for private use; provided, the wind turbine height must be less than sixty (60) feet and the wind turbine must be set back from all property lines a distance equal to one (1) foot for every foot in height of the wind turbine. BCC 11.33.030(q).

Benton County Code Example - BCC 11.33.060 – Uses Requiring a Conditional Use Permit:

(l) One (1) wind turbine with a wind turbine height of sixty (60) feet or more or a wind turbine farm and related support structures and other improvements under the following conditions... Example from Light Industrial District, BCC 11.33.060(l)

## Battery Energy Storage

Battery Energy Storage Systems (BESS) are systems that store energy to supply electricity to a building or the electrical grid at a future time.<sup>5</sup> BESS often take the form of shipping containers with ventilation equipment on the outside and rows of batteries and control systems secured inside. These systems are often deployed as part of utility transmission systems and solar and wind electric generation projects. The demand for BESS is expected to grow in tandem with wind and solar development. The National Fire Prevention Association (NFPA) standard 855 sets safety code thresholds for batteries and requires facilities with total energy storage exceeding 600 kWh to meet hazard mitigation and fire suppression standards. Accordingly, this 600-kWh threshold is commonly applied in definitions and land use regulations for BESS.

Benton County Code already references BESS “as *storage batteries*” in its definitions for solar power facilities. However, a standalone definition for BESS may be warranted as their use grows.

## Renewable Energy Regulation in Benton County Code

Benton County restricts major solar energy development and wind farms in most zones, while allowing minor solar and wind facilities as an accessory use in all zones that allow dwelling units. Major solar facilities are restricted to the Heavy and Light Industrial Districts and the Unclassified District within the U. S. Department of Energy's Hanford site. In 2021, Benton County removed major solar facilities, wind turbines over 60 feet in height, and wind farms as conditional uses in the GMA Agricultural and RL-20 Districts, while adding those uses in the Light Industrial and Heavy Industrial Districts.<sup>6</sup> The County's allowed, accessory, and conditional use designations for wind and solar are summarized in Table 1.

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<sup>5</sup> *Battery Energy Storage Systems*. American Planning Association, 2024

<sup>6</sup> Benton County Ordinance OA 2021-004

**Table 1: Summary of Allowed Renewable Energy Uses in Zoning Districts**

A= Allowed    a = accessory    C=Conditional Use    X=Prohibited

Zoning District	Solar - Major	Solar - Minor	One wind turbine <60 feet.	Wind turbine >60 feet or wind farm
GMA Agricultural (GMAAD)	X	a	A	X
Park District	X	a	X	X
RL-1	X	a	X	X
RL-5	X	a	A	X
RL-20	X	a	A	X
Red Mountain Ag	X	a	A	X
Community Center Residential	X	a	X	X
Community Commercial	X	a	X	X
General Commercial	X	a	X	X
UGA Residential	X	a	X	X
Light Industrial	C	a	A	C
Heavy Industrial	C	a	A	C
Unclassified	A	n/a	A	A

## Renewable Energy Development in Benton County

Several large-scale renewable energy projects have been proposed in Benton County over the past several years. The State of Washington’s Energy Facility Site Evaluation Council (EFSEC) provides a “one-stop” agency process to site major energy facilities in the State of Washington. EFSEC coordinates all evaluation and licensing steps for siting certain energy facilities in Washington and specifies the conditions of construction and operation. If approved, a Site Certification Agreement is issued by EFSEC in lieu of other individual state or local agency use permits. Of the five EFSEC projects proposed or currently operating in Benton County, four are in the County’s Growth Management Act Agricultural District (GMAAD) and would collectively convert or significantly impact over 20,000 acres of agricultural lands. Several of these projects have conflicted with goals and policies in the Benton County Comprehensive Plan to protect valuable agricultural lands, sensitive habitats, and rural character. The existing and proposed large scale energy projects in unincorporated Benton County are summarized in Table 2.

**Table 2: Existing and Proposed Renewable Energy Projects**

Project Name	Status	Estimated Acres	Capacity (MW)
Columbia Generating Station	Active	1,089	1,207
Nine Canyon Wind	Active – locally permitted	5,120	96
Wautoma	Approved by EFSEC	4,573	470
Horse Heaven	Approved by EFSEC	9,826	1150
Wallula Gap	Withdrawn as of May 2025	437	60
Hop Hill	Under Review by EFSEC	11,179	500
<i>At least four solar energy projects are proposed but have not yet been made public.</i>			

\*Estimated project area based on available application documents.

## Agricultural Land Considerations

Agriculture in Benton County is a major part of the local economy, generating over \$1 billion in agricultural products per year.<sup>7</sup> As discussed in the previous section, large scale renewable energy projects have been proposed in Benton County's GMAAD with significant impacts on agricultural lands. A review of the goals, policies, and designation criteria for agricultural resource lands was conducted to evaluate strategies for compatible siting of energy facilities while protecting valuable agricultural lands.

The Benton County Comprehensive plan states the following regarding the protection of commercially significant agricultural lands in Benton County:

**NR Goal 1:** Conserve and maintain agricultural land of long-term commercial significance as the local natural resource most essential for sustaining the County's agricultural economy.

**Policy 1:** Conserve areas designated "GMA Agriculture" in the Comprehensive Plan for a broad range of agricultural uses to the maximum extent possible and protect these areas from the encroachment of incompatible uses.

**Policy 2:** In the event of a conflict between residential uses and normal and routine practices of commercial agriculture on lands designated as GMA Agriculture, support the agricultural use where it is evident that the agricultural practice is consistent with or equivalent to recognized Best Management Practices.

**Policy 3:** Recognize that only uses related or ancillary to, supportive of, complimentary to, and/or not in conflict with agricultural activities are appropriate in areas designated GMA Agriculture.

## Agricultural Land Designations

Agricultural land of long-term commercial significance is defined under RCW 36.70A.030(3) as "land primarily devoted to the commercial production of horticultural, viticultural, floricultural, dairy, apiary, vegetable, or animal products or of berries, grain, hay, straw, turf, seed, Christmas trees not subject to the excise tax imposed by RCW 84.33.100 through 84.33.140, finfish in upland hatcheries, or livestock, and that has long-term commercial significance for agricultural production."

Per RCW 36.70A.170(1)(a), counties shall designate where appropriate, "Agricultural lands that are not already characterized by urban growth and that have long-term significance for the commercial production of food or other agricultural products." Benton County completed that designation as described in the Comprehensive Plan and reflected in the County's GMAAD. Figure A-1 shows current zoning districts in the County, including the GMAAD. Agricultural lands were designated based on the primary factors of urban growth, production capability, and long-term commercial significance. In

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<sup>7</sup> USDA Census of Agriculture, 2022 [County Profile](#).

2018, Benton County conducted additional analysis of agricultural lands of long-term commercial significance and designated land as part of its Comprehensive Plan Update.

Benton County's designation updates applied the factors established in WAC 365-190-050(3) as well as County-specific supplemental factors. The factors considered in the 2018 study included:

- Urban growth
- Production capability based on USDA NRCS land capability classes
- Soil quality and Prime Farmland Classification
- Irrigation and water availability
- Parcel size
- Proximity to Urban Growth Areas and land use patterns
- Land in conservation programs
- Pesticide restrictions
- Public facilities and infrastructure
- Economic viability and market proximity
- Tax status and land values
- Food security considerations

For consistency, the analysis of energy overlays incorporated the applicable soils and agriculture data and criteria used in Benton County's review and updated designations of agricultural lands of long-term commercial significance. Specifically, the analysis included:

- Production capability based on NRCS land capability class
- Prime Farmland Classification<sup>8</sup>
- Irrigation and water availability

Maps displaying the spatial extent of these factors are attached in Figures A-2 – A-5

## Habitat Considerations

Of the 1,115,673 acres of land in Benton County, roughly 70% intersect with areas identified as Priority Habitats and Species (PHS) by the Washington Department of Fish and Wildlife (WDFW).<sup>9</sup> Benton County also contains important habitat cores and linkage areas mapped through the Arid Lands Initiative and the Washington State Shrubsteppe Restoration and Resiliency Initiative (WSSRI). Significant intersections with PHS, habitat cores, and habitat linkage areas occur on agricultural lands and open spaces that tend to be the primary siting location for large-scale energy development. Sensitive habitats commonly occur outside and at the margins of more intensively farmed cropland in Benton County. This presents a challenge in identifying suitable lands for renewable energy development, as efforts to avoid facilities on protected agricultural lands may conflict with protection of sensitive species and habitats.

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<sup>8</sup> NOTE: The analysis considered if soils with the classification "Prime Farmland if Irrigated" are irrigated

<sup>9</sup> Based on WDFW PHS data provided by Benton County GIS

Habitat data reviewed for this analysis included:

- WDFW PHS polygons
- NWI Wetlands
- Arid Lands Initiative Priority Core Areas & Linkage Areas
- WSU Least Conflict Solar Siting Conservation Value Map
- WSSRI Map Portal “core areas”
- U.S. Fish and Wildlife Service Information for Planning and Consultation (IPaC)

Spatial analysis of sensitive habitats incorporated the following data:

- WDFW PHS polygons, including
  - Ferruginous Hawk Breeding Areas
  - Shrubsteppe areas
  - Biodiversity Areas and Corridors
  - Other PHS habitats,
- Arid Lands Initiative Priority Core Areas & Linkage Areas

A teleconference meeting was held in February 2025 with WDFW solar and wind energy biologists to gather input on potential energy overlay approaches. In general, the WDFW staff recommended a site-specific approach for locating energy facilities. Staff members noted that mapped habitats provide general indications of the extent of habitats and species at the landscape scale, but don't always reflect conditions on the ground. WDFW staff indicated that appropriate areas for energy development to minimize habitat impacts would most likely occur on existing disturbed sites situated around irrigated agricultural lands. WDFW staff also shared a list of resources to assist in evaluating habitat impacts for energy projects, including specific data sources and their applicability in the site evaluation process. This information is included in Appendix B. Further information will be added when the WDFW guidelines are released. This information is expected from WDFW in Spring 2025 (still not released as of June 11, 2025).

## Other Considerations

Additional considerations included critical areas and landscape features that may impact suitability for energy development. Specifically:

- Wetlands
- Geologically Hazardous Areas (GHA), mapped by Benton County
- Streams, canals & waterbodies
- Public roads

Geologically hazardous areas include soils with moderate to high liquefaction potential, areas with combined steep slopes and erosion potential, and historic landslide areas. These areas were flagged in the final analysis results since they can affect energy development but do not preclude it.

# Analysis

The goal of the analysis was to map areas of lower conflict with protected agricultural lands, sensitive habitats, and other limitations to inform siting considerations for renewable energy development<sup>10</sup>. The GIS layers used in the analysis are summarized below.

**Table 3: Analysis Inputs**

Layer	Source
Benton County Zoning	Benton County GIS
Benton County Parcels	Benton County GIS
Public Lands	Benton County GIS
Agricultural lands mapped by the WSDA	WSDA, 2023
Soils with NRCS Non-irrigated Capability Classification 1-4	USDA SSURGO
Soils classified as Prime Farmland, Farmland of Unique & Statewide Importance	USDA SSURGO
WDFW PHS including: <ul style="list-style-type: none"> <li>• Shrubsteppe</li> <li>• Ferruginous Hawk breeding areas</li> <li>• Biodiversity Areas and Corridors</li> <li>• All other state listed species</li> </ul>	Benton County GIS
Geologically Hazardous Areas	Benton County GIS

## Analysis Scenarios

To determine where suitable conditions for renewable energy development may exist, protected agricultural lands and lands with potential “lower conflict” for energy facilities were categorized using three scenarios, as described below.

### Scenario 1:

“Protected Ag Lands” include:

- All agricultural lands mapped by the WSDA
- Soils with NRCS Non-irrigated Capability Classification 1-4
- Soils classified as Farmlands of Unique Importance, Statewide Importance, or Prime Farmlands

“Lower Conflict Areas” include:

- Soils with NRCS Non-irrigated Capability Classification 5 – 8
- Lands not meeting any of the “Protected Ag” criteria.

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<sup>10</sup>NOTE: Preliminary analysis was conducted using Washington State University Energy Program’s “Columbia Plateau Least Conflict Solar Siting” data gateway.<sup>10</sup> This tool contains spatial data to assist in defining least-conflict utility scale solar siting in eastern Washington. While a useful starting point, the data is provided at a low spatial resolution and does not incorporate the County’s criteria or priorities for farmland protection.

**Scenario 2:**

“Protected Ag Lands” include:

- All agricultural lands mapped by the WSDA
- Soils with NRCS Non-irrigated Capability Classification 1-4
- Soils classified as Farmlands of Unique Importance & Statewide Importance

“Lower Conflict Areas” include:

- Areas mapped as Prime Farmlands (if irrigated) but not irrigated.<sup>11</sup>
- Soils with NRCS Non-irrigated Capability Classification 5 – 8
- Lands not meeting any of the “Protected Ag” criteria.

**Scenario 3:**

“Protected Ag Lands” include:

- Irrigated agricultural lands mapped by the WSDA
- Soils with NRCS Non-irrigated Capability Classification 1-4
- Soils classified as Farmlands of Unique Importance & Statewide Importance

“Lower Conflict Areas” include:

- Soils with NRCS Non-irrigated Capability Classification 5 – 8
- Soils mapped as Prime Farmlands (if irrigated) by the USDA that are not irrigated.
- Lands not meeting any of the “Protected Ag” criteria.

In all scenarios, after lands were labeled as “Protected Ag” or “Lower Conflict” based on the listed criteria, they were intersected with Benton County parcels, zoning, public ownership, PHS habitats, wetlands, and steep slopes for summary. While all land use zones were initially included in the analysis, results were summarized for the GMAAD, which is the primary zone considered for renewable energy development other than those already allowing it.

A summary of the data pulled from the three scenarios is found in Table 4.

**Table 4: Summary of Analysis Results in the GMAAD**

	<b>Category</b>	<b>Total Acres</b>		<b>In PHS, GHA, or Wetlands</b>		<b>Not PHS, GHA, or Wetlands</b>	
<b>Scenario 1</b>	Lower Conflict	93,441	(15%)	88,877	(95%)	4,565	(5%)
	Protected Ag	543,431	(85%)	293,384	(54%)	250,046	(46%)
<b>Scenario 2</b>	Lower Conflict	113,364	(18%)	103,518	(91%)	9,846	(9%)
	Protected Ag	523,508	(82%)	278,743	(53%)	244,765	(47%)
<b>Scenario 3</b>	Lower Conflict	195,056	(31%)	143,426	(74%)	51,630	(26%)
	Protected Ag	441,816	(69%)	238,835	(54%)	202,981	(46%)

<sup>11</sup> Irrigation of agricultural lands was assessed using WSDA agricultural lands data, cross referenced with LandSAT multispectral satellite imagery seasonal composites.

## Discussion

In Scenario 1, 85% of lands are classified as “Protected Ag,” leaving 15% classified as “Lower Conflict.” In Scenario 2, the breakdown is 82% to 18%, and in Scenario 3 it is 69% to 31%. The primary difference between Scenario 3 and Scenarios 1 & 2 is that Scenario 3 includes unirrigated farmland with lower suitability soils, which comprises a large area in the western portion of Benton County. A significant portion of the “Lower Conflict” lands in each scenario intersect with PHS, GHAs, or wetlands. Considering that these datasets are mapped at a broad spatial scale, this does not necessarily preclude energy development but indicates a need for further review. Portions of the “Lower Conflict” agricultural lands that intersect with PHS or GHAs may be developable based on-site specific conditions.

In each scenario, “Lower Conflict” areas tend to be relatively small, irregular polygons, although Scenario 3 also contains some larger tracts. In Scenarios 1 and 2, the average extent of “Lower Conflict” area per parcel is **20 - 29 acres**. After excluding sensitive habitats and steep slopes, the average area size is **6 -10 acres**. Under Scenario 3, the average “Lower Conflict” extent per parcel is **70 acres**, and **30 acres** after excluding habitats and steep slopes. For the most part, “Lower Conflict” areas were in and around irrigation pivots and other lesser-used fringes of agricultural parcels. These area sizes would not accommodate the larger-scale renewable projects proposed in Benton County over the past several years. Furthermore, it is unlikely that the size and layout of these areas would support wind energy development at any significant scale. Maps of each scenario are included in Figures A-8 to A-13.

Solar and wind development is already a conditionally permitted use in some areas of the County, including the Light Industrial and Heavy Industrial Zones, and areas with the Hanford Site. Additionally, lands within the incorporated cities support renewable development. Table 5 summarizes the acreage in zones where utility-scale solar and wind farm development in unincorporated Benton County.

**Table 5: Existing Land Base to Support Renewable Energy Development**

<b>Zone</b>	<b>Developed</b>	<b>Underutilized</b>	<b>Vacant</b>	<b>% of Vacant in PHS, GHA, or Wetlands</b>
Heavy Industrial	380	305	1,154	69.1%
Light Industrial	450	221	713	60.4%
Hanford Industrial <sup>1</sup>	629	12,527	33,861	99.8%

Notes:

1. Hanford lands include “Industrial” zoned lands per the Hanford Comprehensive Land Use Plan (CLUP). All of the existing and proposed energy development at the Hanford site has occurred within this zone, however, additional lands may support renewable energy development in the future.
2. Additional lands allowing renewable energy development exist within incorporated cities.

## Conclusions

The analysis used criteria consistent with the Benton County Comprehensive Plan to identify “Protected” vs. “Lower Conflict” lands using three scenarios. Under each scenario, “Lower Conflict” areas generally followed a fractured pattern on the landscape, concentrated at the edges of intensively farmed land. Under all three scenarios, most “Lower Conflict” lands intersect with sensitive habitats, wetlands, and geologic hazard areas. However, this is also the case in the zones where major solar facilities and wind farms are already allowed, as shown in Table 5. This indicates that while PHS, GHAs may require additional site-specific review, their presence does not necessarily preclude energy development. The typical size and spatial layout of “Lower Conflict” lands on the overall agricultural landscape could support utility scale solar developments of 20-40 acres (4-8 MW at ~5 MW/ac).<sup>12</sup> Some sites could support larger facilities of up to 100 - 200 acres, depending on site specific habitat considerations. Figure A-15 shows an example of a potential solar facility siting based on the analysis. Generally, the size and layout of “Lower Conflict” areas would not support wind farm development. Therefore, subsequent recommendations are focused on solar energy development or other smaller footprint energy production facilities.

## Recommendations

Based on the analysis, Benton County could pursue one of the following strategies, or a combination of strategies:

### 1. Maintain Existing Conditions

Keep allowable uses the same in all zones, citing the existing availability of lands for energy development in the Light Industrial, Heavy Industrial and Unclassified zones – particularly within the boundaries of the Hanford site.

### 2. Update Development Regulations to Allow Energy Development at Appropriate Scale

Revise definitions in BCC 11.03.010 to include a definition for *minor* utility-scale solar development with a footprint of 20 acres or less. Include the following three definitions for solar facilities:

1. Small-Scale Solar Power Generator Facility (on-site use)
2. Utility-Scale Solar Power Generator Facility, Minor, (up to 20 acres)
3. Utility-Scale Solar Power Generator Facility, Major, (greater than 20 acres).

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<sup>12</sup> American Planning Association. (2023). [Solar at Scale Guidebook \(V3\)](#).

Additionally, consider adding **Utility-Scale Solar Power Generator Facility, Minor** as a conditionally permitted use in the GMA Agricultural District, and list habitat protection, decommissioning, and other relevant conditions. Guidance suggests using acres of the project’s land coverage or footprint rather than megawatts since technology and efficiency may change over time.<sup>13</sup> Establishing a clear definition of the footprint or land coverage of energy development is essential.

Example definitions to define “land coverage” or “footprint” include:

**Solar Land Coverage** means “The land area that encompasses all components of the solar [energy] system including but not limited to mounting equipment, panels and ancillary components of the system. This definition does not include access roads or fencing and is not to be interpreted as a measurement of impervious surface as it may be defined in this ordinance. (NHSEA Model Solar Zoning Ordinance 2018)”.

**Footprint** means “The footprint of a ground-mounted solar energy system (SES) is calculated by drawing a perimeter around the outermost SES panels and any equipment necessary for the functioning of the SES, such as transformers and inverters. The footprint does not include any visual buffer or perimeter fencing. Transmission lines (or portions thereof) required to connect the SES to a utility or consumer outside the SES perimeter shall not be included in calculating the footprint. (Georgia Model Solar Ordinance 2018)”.

### 3. Establish an Energy Overlay Area within the GMA Agricultural District.

The Draft Energy Overlay Map (Figure 1) delineates an energy overlay area within the GMA Agricultural District where utility-scale solar energy development may be permitted through a conditional use process. The Overlay Area includes **Zone 1**, where energy development is prohibited (except under limited exceptions), and **Zone 2**, where energy development may be conditionally permitted subject to detailed review and compliance with siting criteria. The Overlay Area does not alter the underlying zoning but introduces additional standards to guide renewable energy siting in a manner that protects agricultural viability and critical areas. The areas encompassed by the proposed Energy Overlay Area are summarized in Table 6.

**Table 6: Proposed Energy Overlay Acreage**

<b>Zone</b>	<b>Acres</b>	<b>PHS, GHA, Wetlands</b>	<b>Not PHS, GHA, Wetlands</b>
Zone 1 – Prohibited	178,602	81,331 (46%)	97,271 (54%)
Zone 2 – Conditionally Permitted	114,893	65,704 (57%)	49,189 (43%)
<b>Total Acres:</b>	<b>293,495</b>		

The proposed criteria for Zone 1 and Zone 2 are included below. A map showing the Draft Energy Overlay Area and the extent of zones 1 and 2 is included in Figure 1.

<sup>13</sup> American Planning Association. (2023). [Solar at Scale Guidebook \(V3\)](#). p.75

## Zone 1

Construction of energy facilities other than those already permitted in the underlying GMA Agriculture District is **prohibited** in Zone 1 except under defined exceptions.

Zone 1 includes the following areas:

- NRCS land capability classes 1-4.<sup>14</sup>
- Farmlands of Unique or Statewide Importance as mapped by the USDA
- Irrigated agricultural lands as mapped by the Washington State Department of Agriculture (WSDA)

Energy development may be allowed in Zone 1 under the following exceptions.

1. Satisfactory documentation is provided by the applicant demonstrating that the proposed site does not contain suitable soils for agricultural production or irrigated agricultural lands.
2. The project is proposed only on lands that have been converted to roads, parking lots, storage areas, runways, or other uses that have disturbed existing ground prior to the adoption of the energy overlay zone.
3. The project only includes rooftop installations on buildings constructed prior to the adoption of the energy overlay zone.
4. The project is sited within existing powerline rights-of-way.
5. The project is within highway interchanges and contains satisfactory conditions to minimize impacts.
6. Buffer of at least **x** distance from existing residential areas for the type of use (varies by energy type).

## Zone 2

Construction of energy generation facilities, including but not limited to those meeting the definition of **Solar Power Generator Facility, Major** in BCC 11.03.010(168) and other energy generation facilities that may hereafter be defined in BCC, such as small modular nuclear reactors or anaerobic digesters, may be **conditionally permitted** in Zone 2 subject to siting and application requirements.

Zone 2 includes the following areas:

- Any lands not meeting the criteria of Zone 1, meaning any lands that are not used for irrigated agriculture and are within NRCS land-capability classes 5-8.

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<sup>14</sup> This is consistent with WAC 365-190-050(3)(b)(i) and the criteria used in the 2018 Ag lands memo

Proposed projects in Zone 2 would need to submit a conditional use permit application demonstrating compliance with specific submittal requirements, review criteria, and development standards.

A conceptual list of elements to be included in the review process is included below.

### **1. Submittal Requirements**

- Scaled site plan showing structures, access, topographic contours, and critical areas
- Topographic survey identifying all areas with >7% slopes
- Written narrative addressing CUP criteria and overlay zone compliance
- Critical Areas Report (if applicable)
- Habitat assessment and mitigation plan (if applicable)
- Stormwater management plan
- Noxious weed management plan
- Glare and lighting analysis
- Fire management plan approved by the Fire Marshal
- Affidavit of agreement between landowner and operator (if applicable)
- Water rights retention plan (if applicable)
- Decommissioning and site reclamation plan
- Engineer-certified decommissioning cost estimate
- Financial surety (bond or letter of credit) equal to demonstrating financial surety to complete decommissioning.

### **2. Review Criteria**

- Complies with CUP procedures in BCC 11.50.050
- Located outside NRCS Classes 1–4 and WSDA irrigated lands
- Located outside critical areas or mitigates impacts consistent with BCC Title 15
- Avoids or mitigates for impacts to shrub-steppe and other PHS wildlife habitat and complies with WDFW 2025 solar siting guidelines

### **3. Development Standards**

- Height standards (maximum panel height of 20 feet; ancillary structures must meet limits of underlying zone)
- Setback standards (minimum 25 feet from property lines; 100 feet from off-site residences)
- Fencing compliant with WDFW wildlife guidance
- Visual screening from roads and residences
- Glare control (use of glare-resistant materials; no offsite glare)

- Lighting standards (shielded and downward-facing)
- Ground cover using native or pollinator-friendly species
- Noxious weed prevention and control
- Retention of water rights
- Compliance with building and electrical codes
- Signage with operator and 24-hour contact

This recommendation provides a framework for siting of renewable energy generation facilities within the Energy Overlay area. A draft Energy Overlay Map incorporating Zone 1 and Zone 2 is included in Figure 1.

Figure 1: Draft Energy Overlay Map

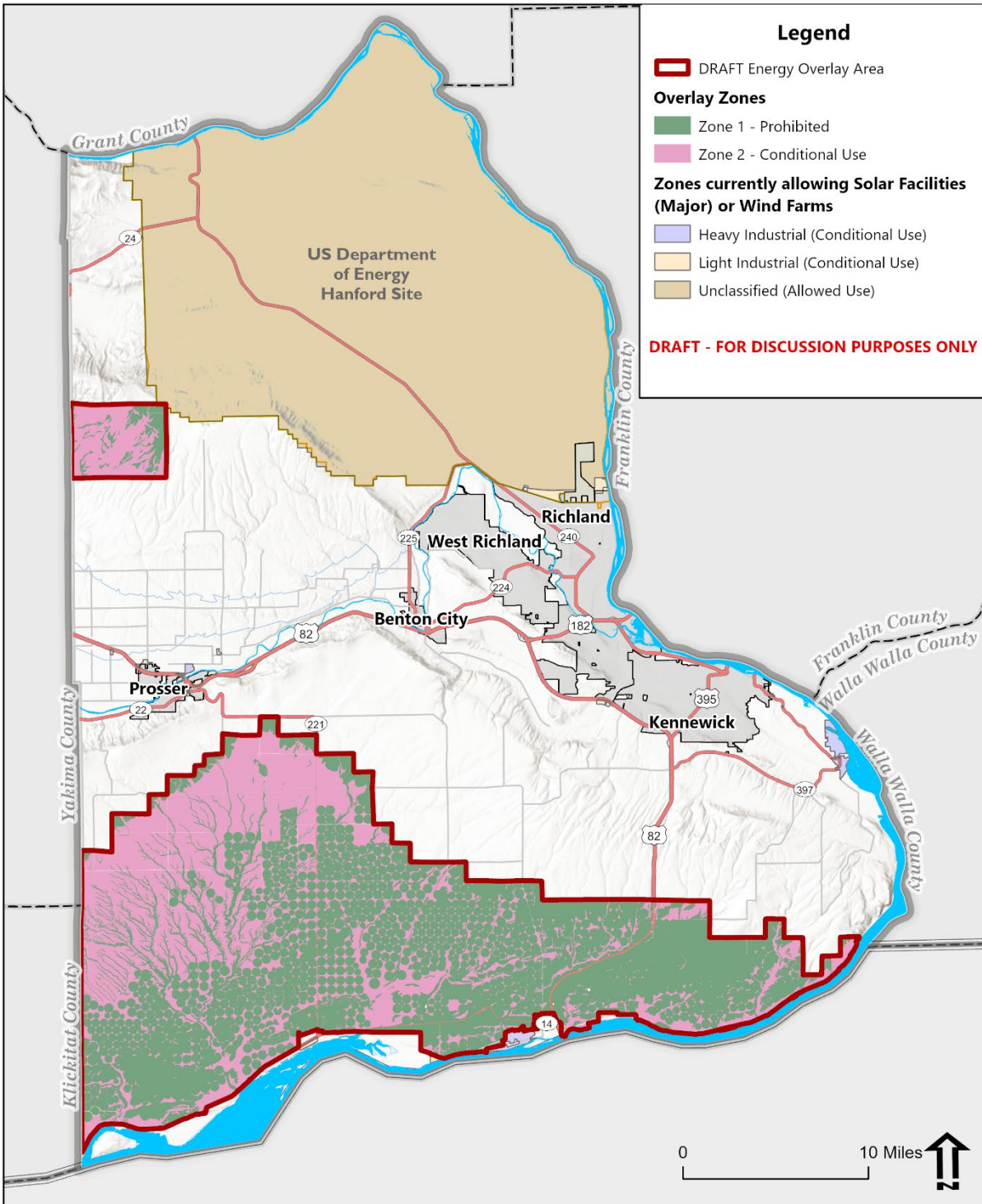


Figure 1  
Draft Energy Overlay

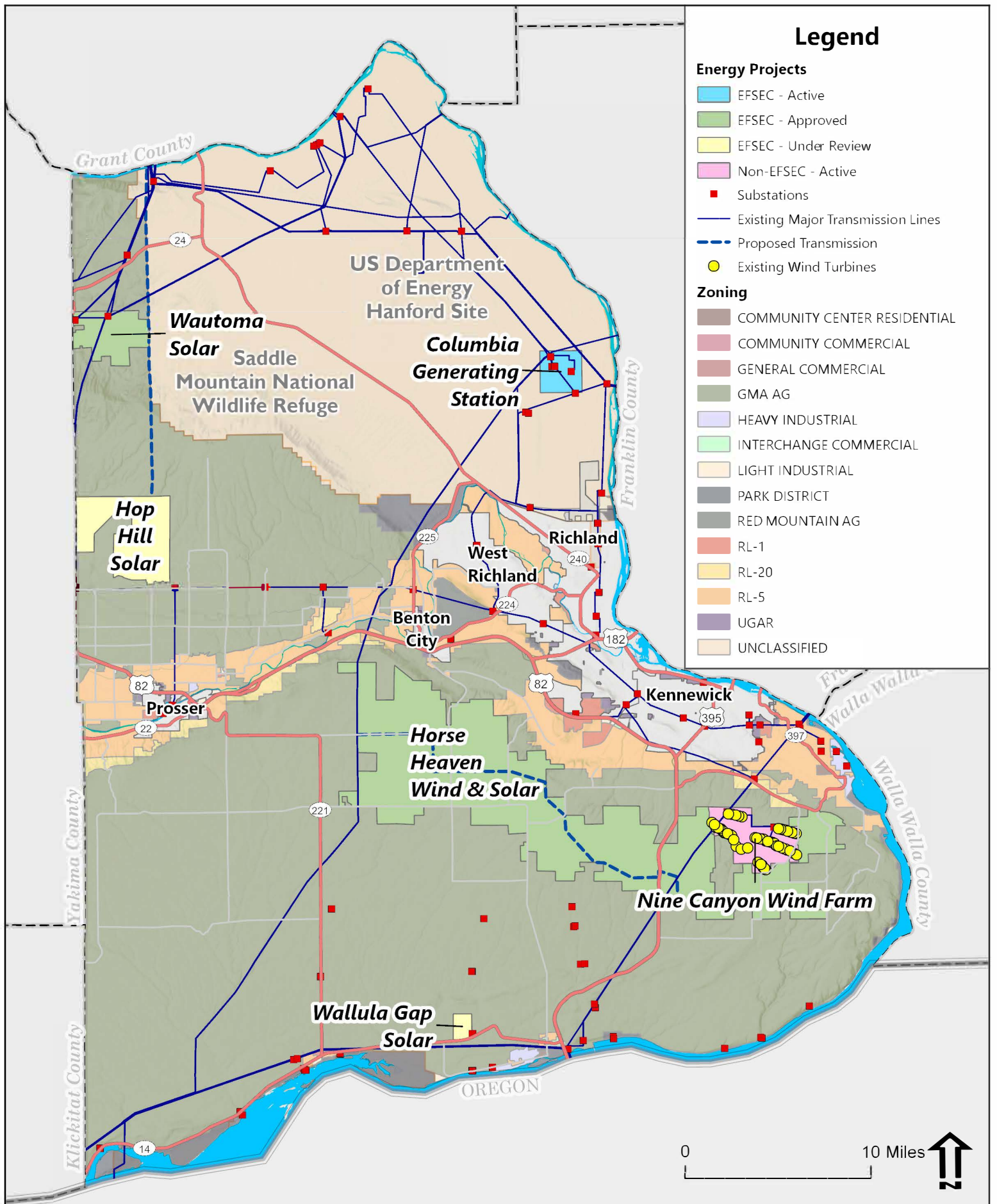
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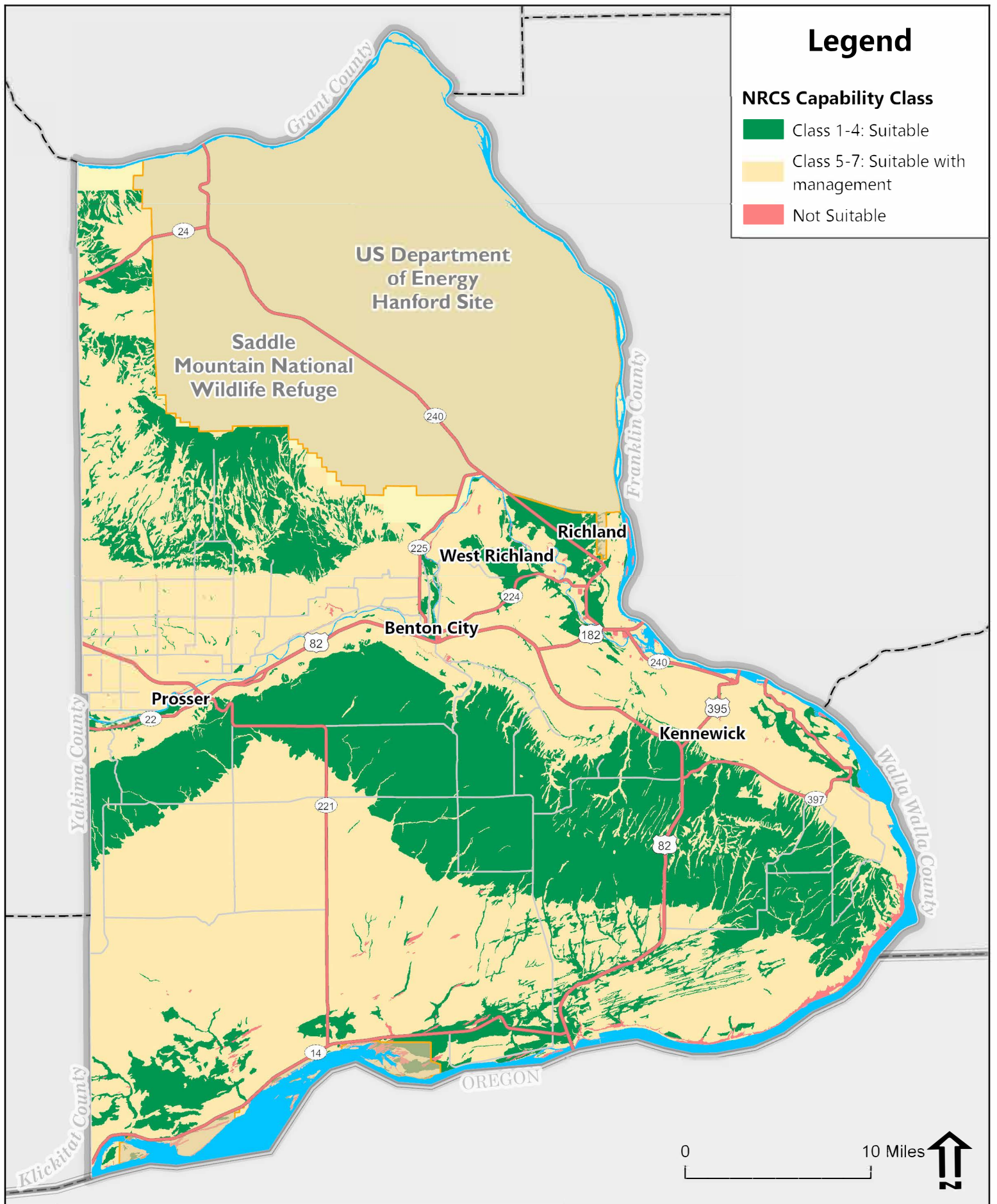
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# Appendix A

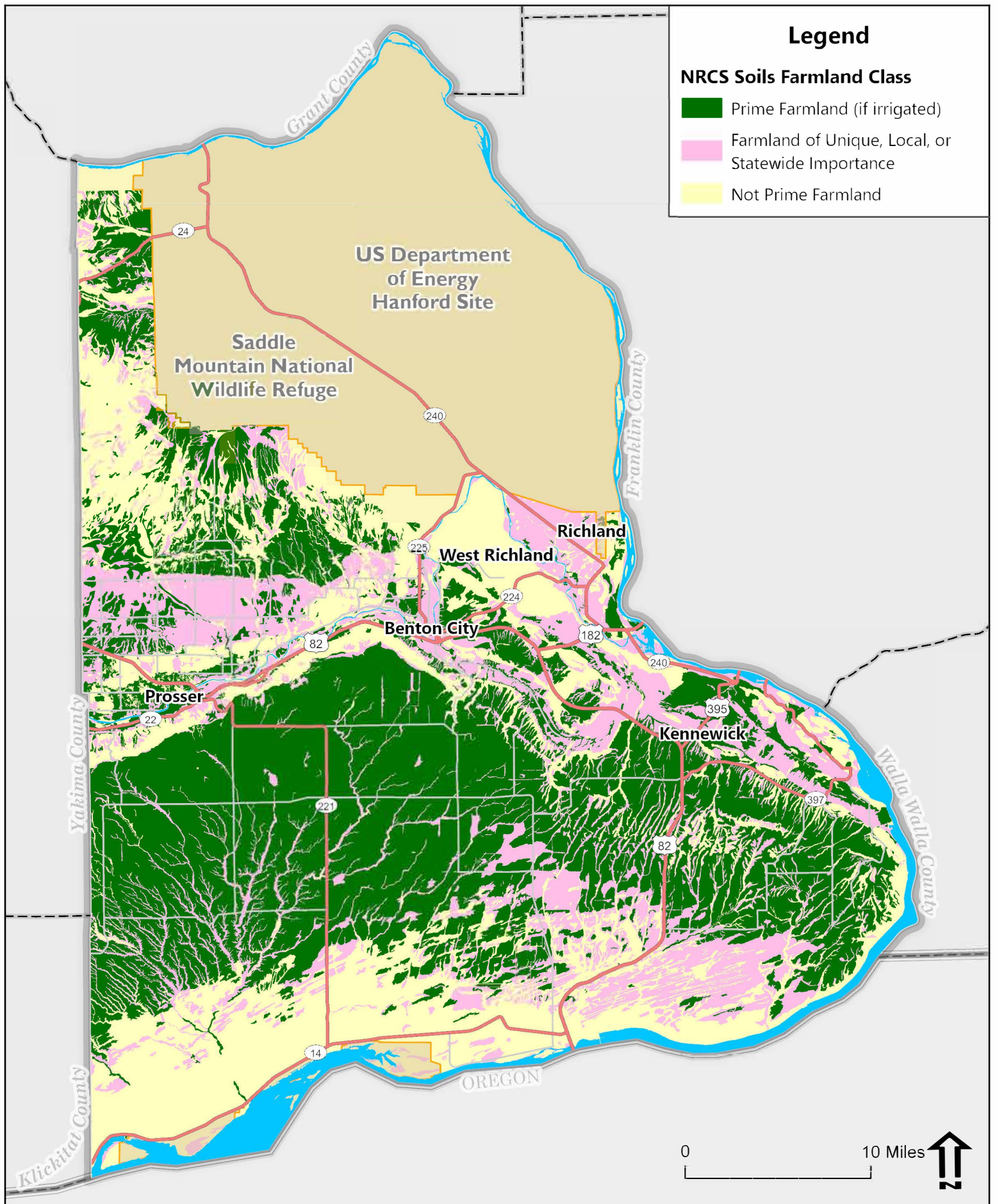
## Energy Overlay Map Folio

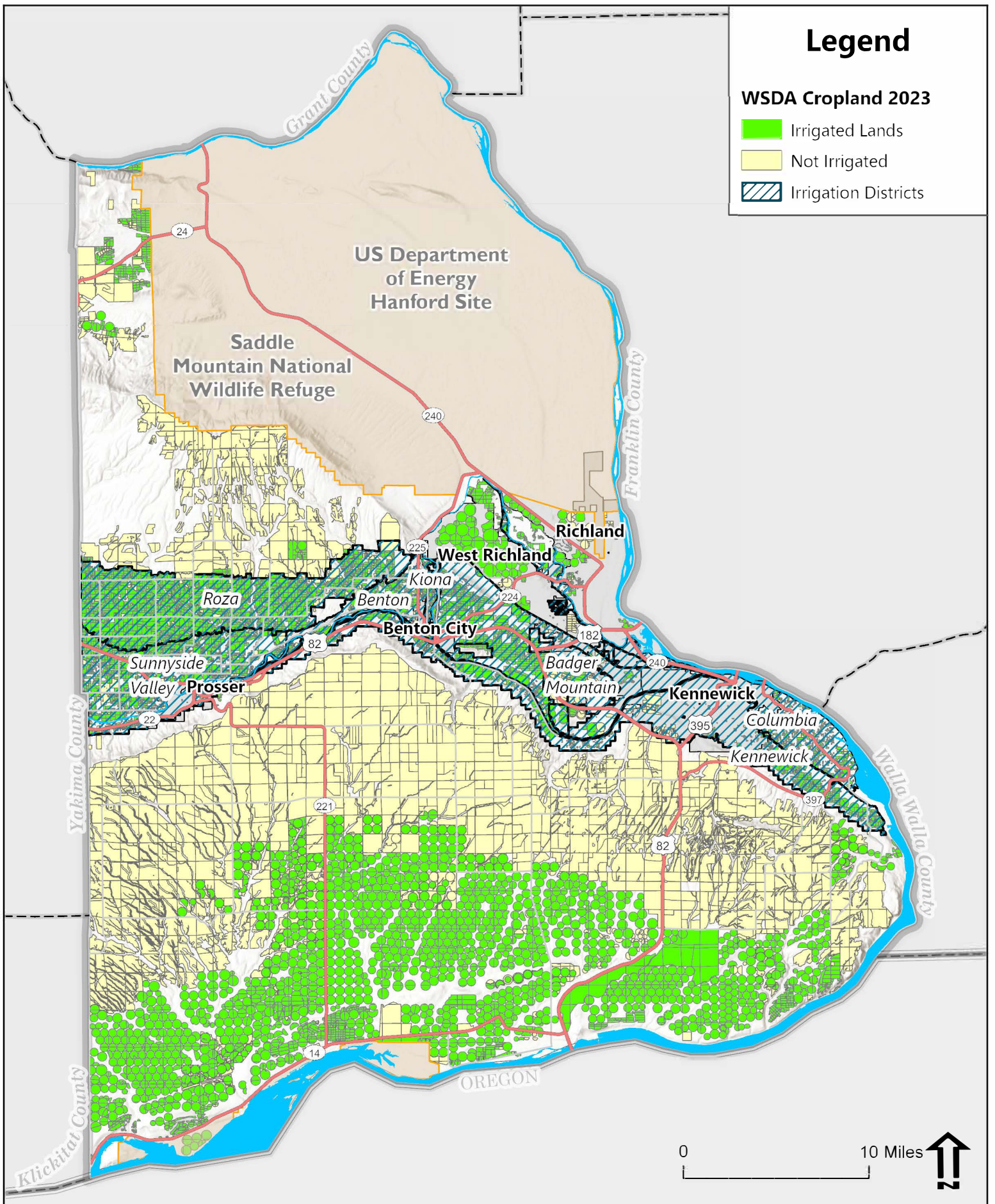
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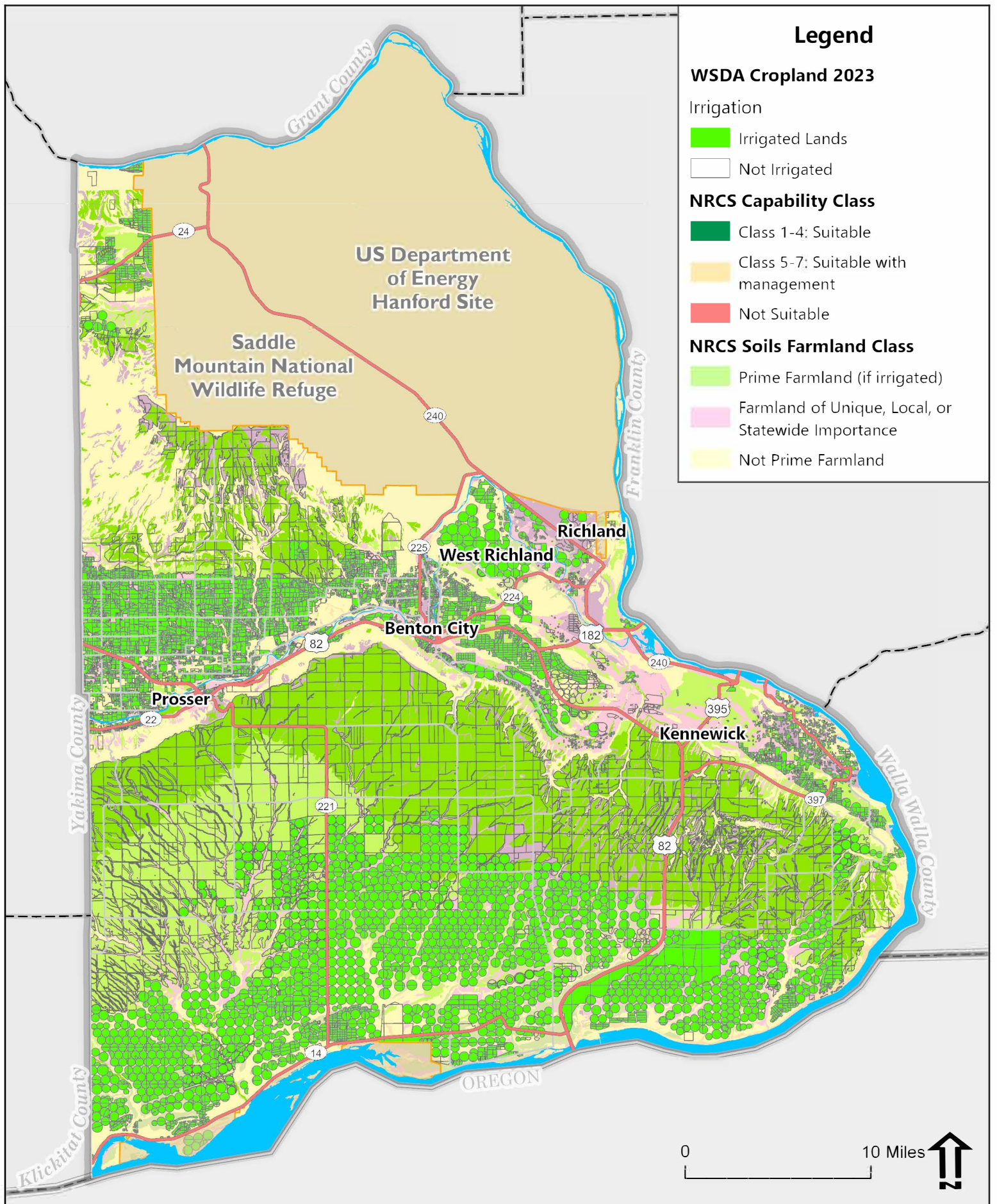


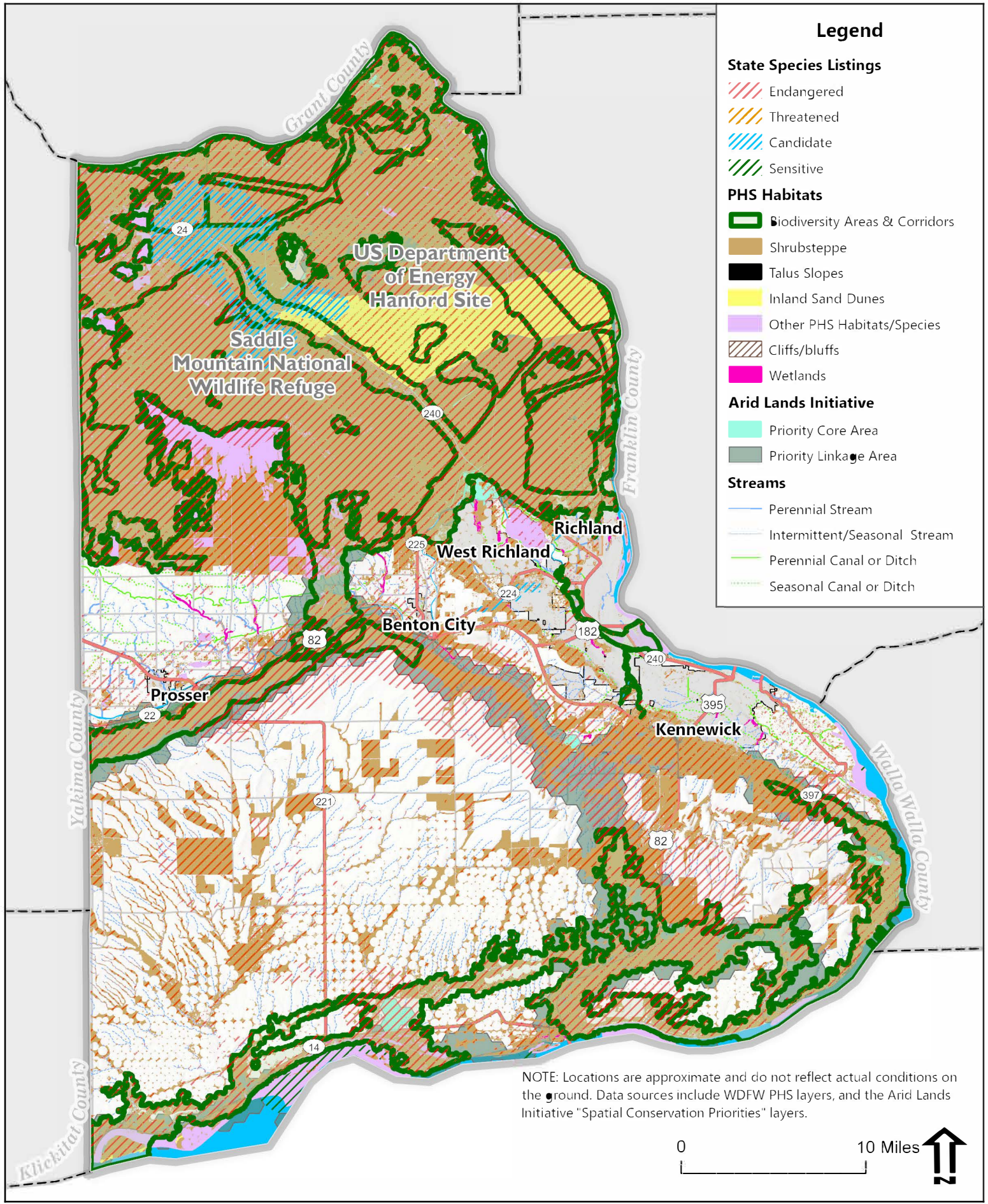
**Figure A-2**  
**NRCS Land Capability Classes**



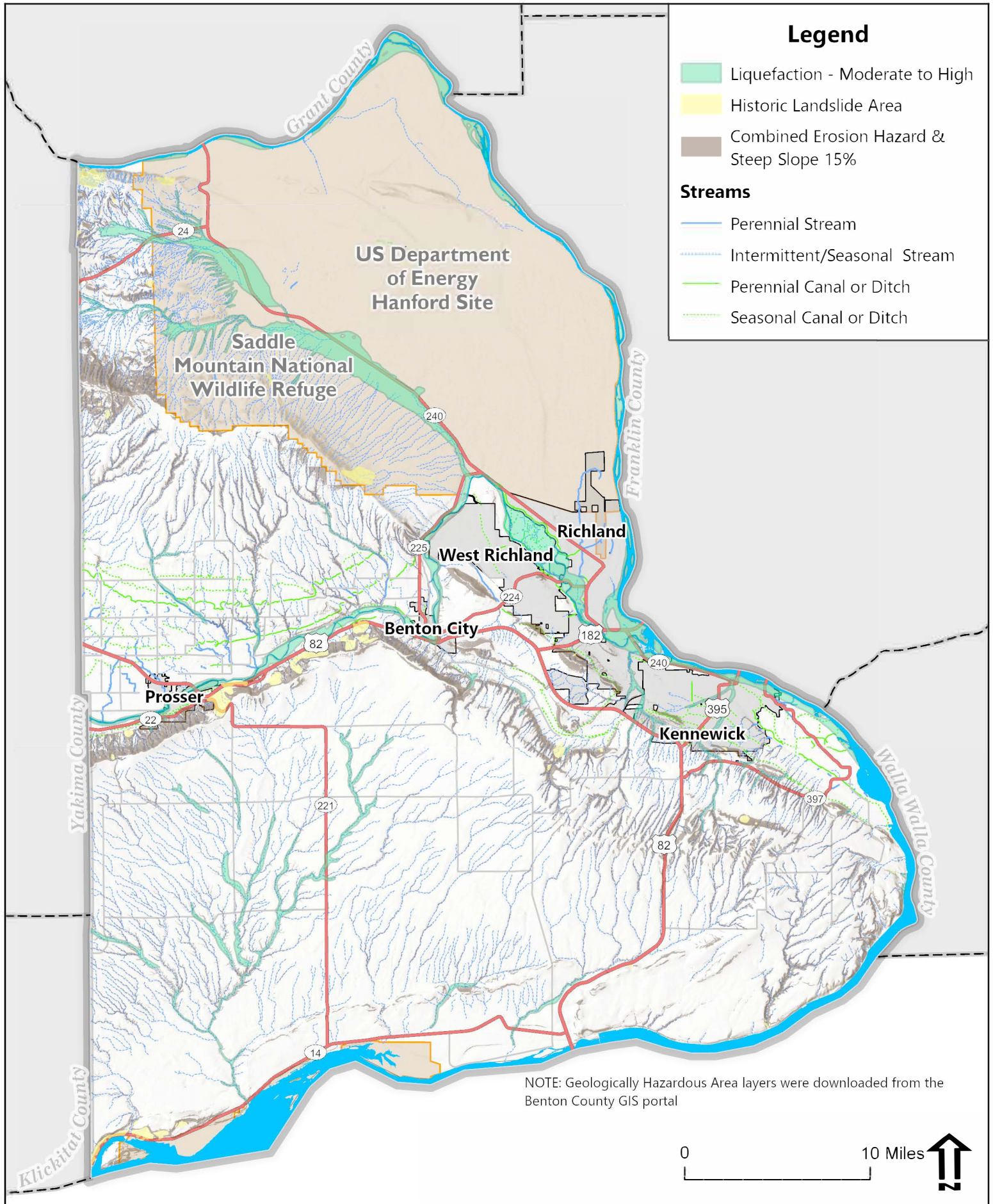


**Figure A-4**  
**Irrigation Districts & WSDA Ag Lands**





**Figure A-6**  
**WDFW Priority Habitats & Species**



**Legend**

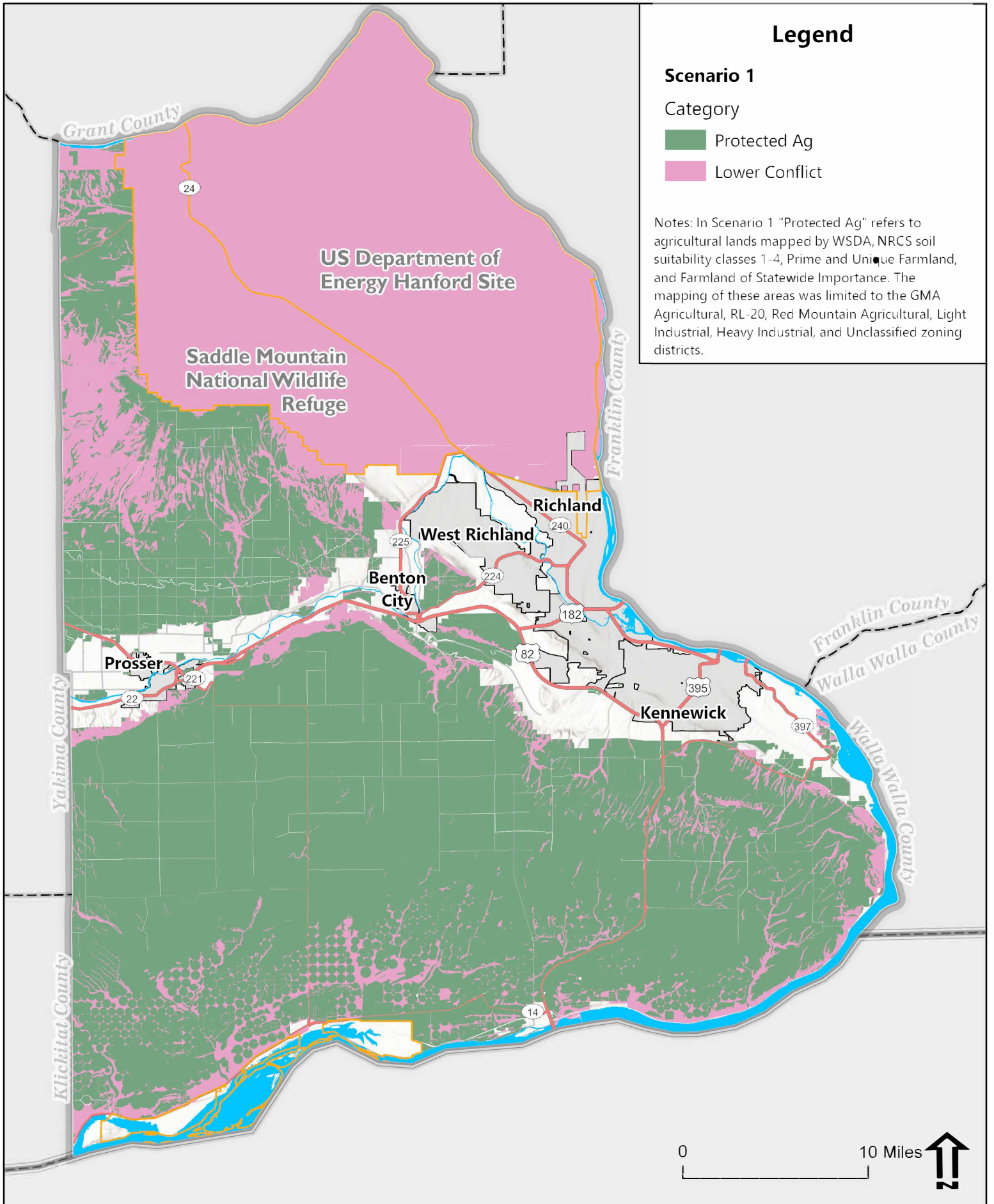
- Liquefaction - Moderate to High
- Historic Landslide Area
- Combined Erosion Hazard & Steep Slope 15%

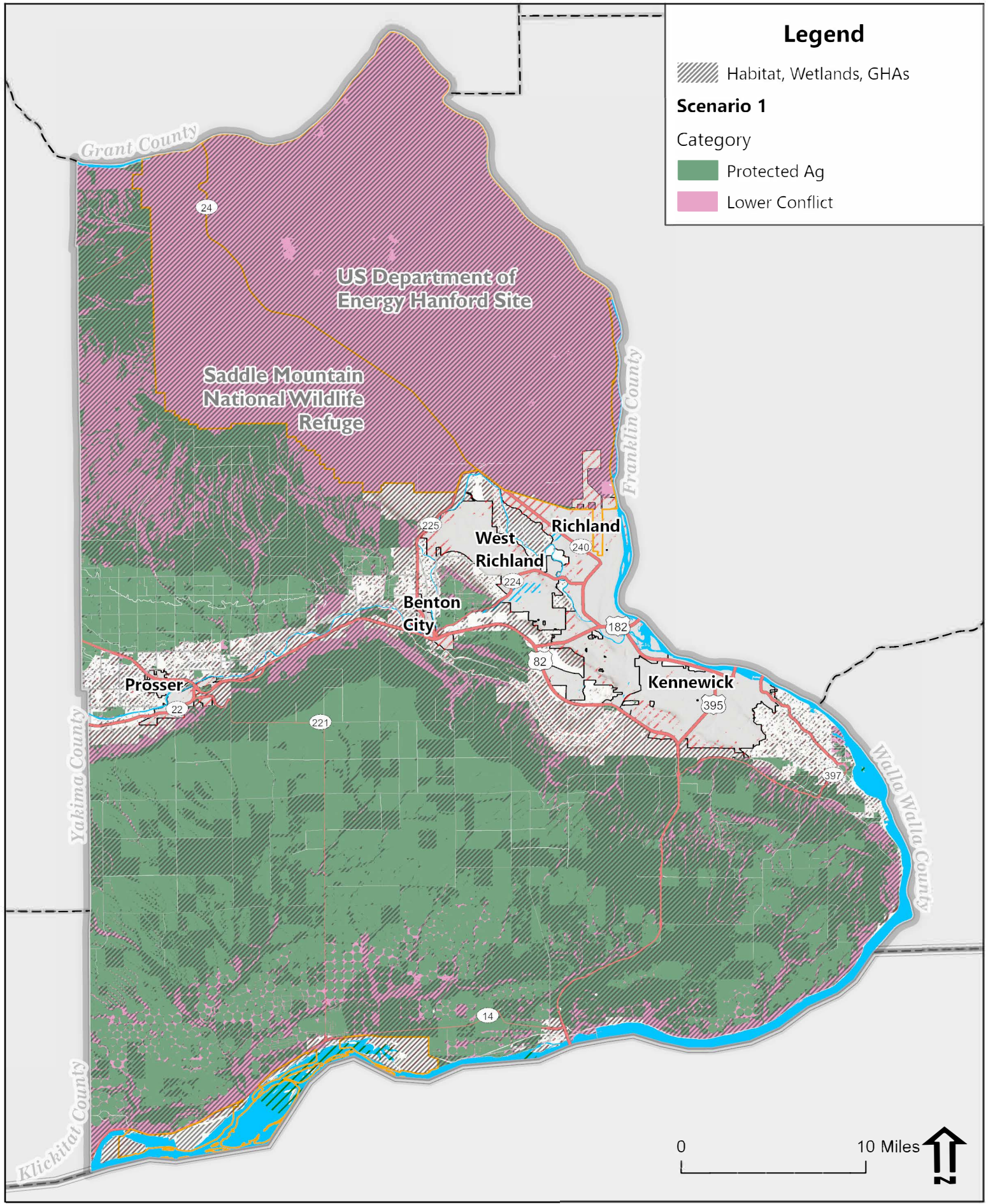
**Streams**

- Perennial Stream
- Intermittent/Seasonal Stream
- Perennial Canal or Ditch
- Seasonal Canal or Ditch

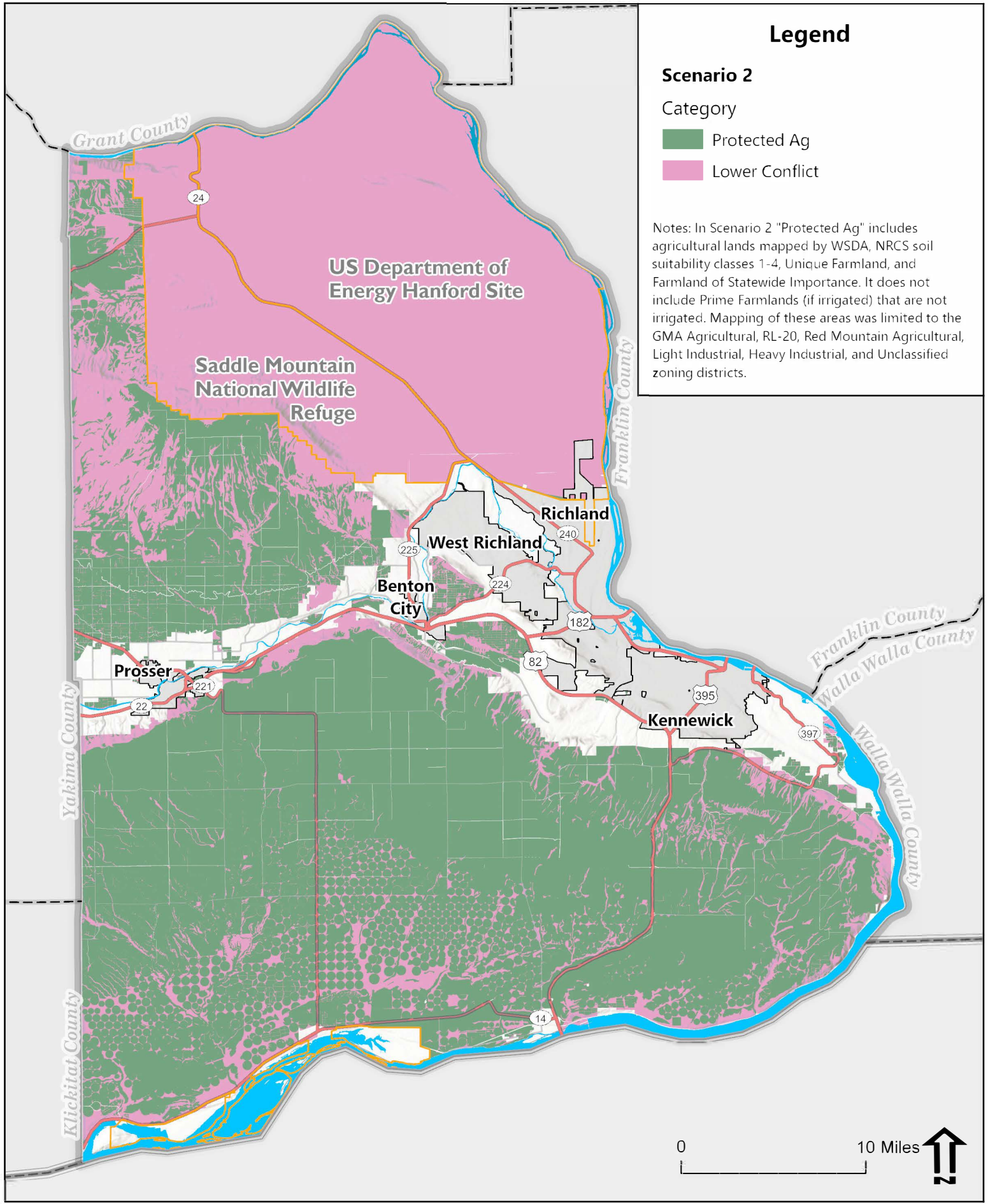
NOTE: Geologically Hazardous Area layers were downloaded from the Benton County GIS portal







**Figure A-9**  
**Scenario 1 with PHS & GHA**



**Figure A-10**  
**Lower Conflict Analysis Scenario 2**

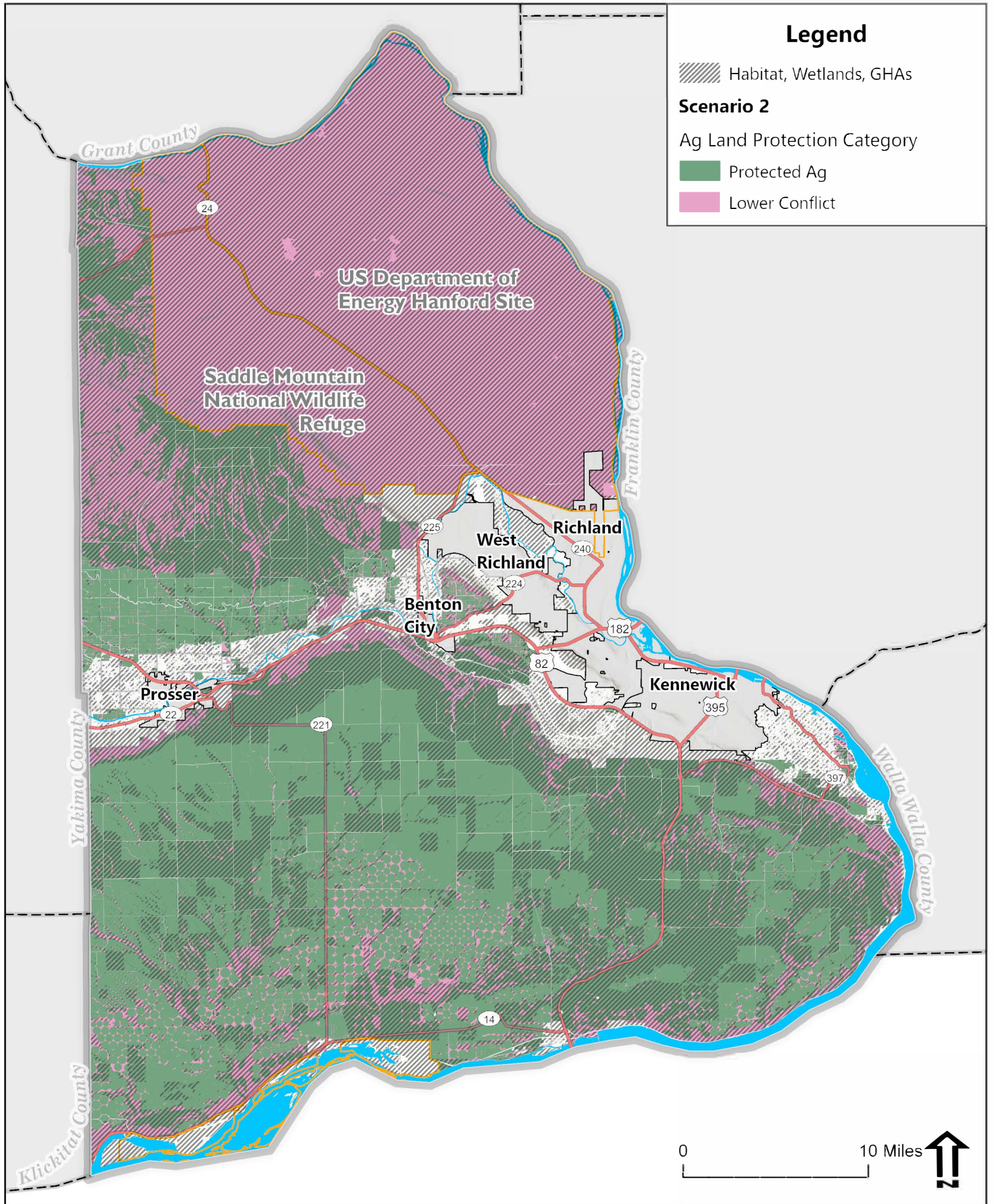
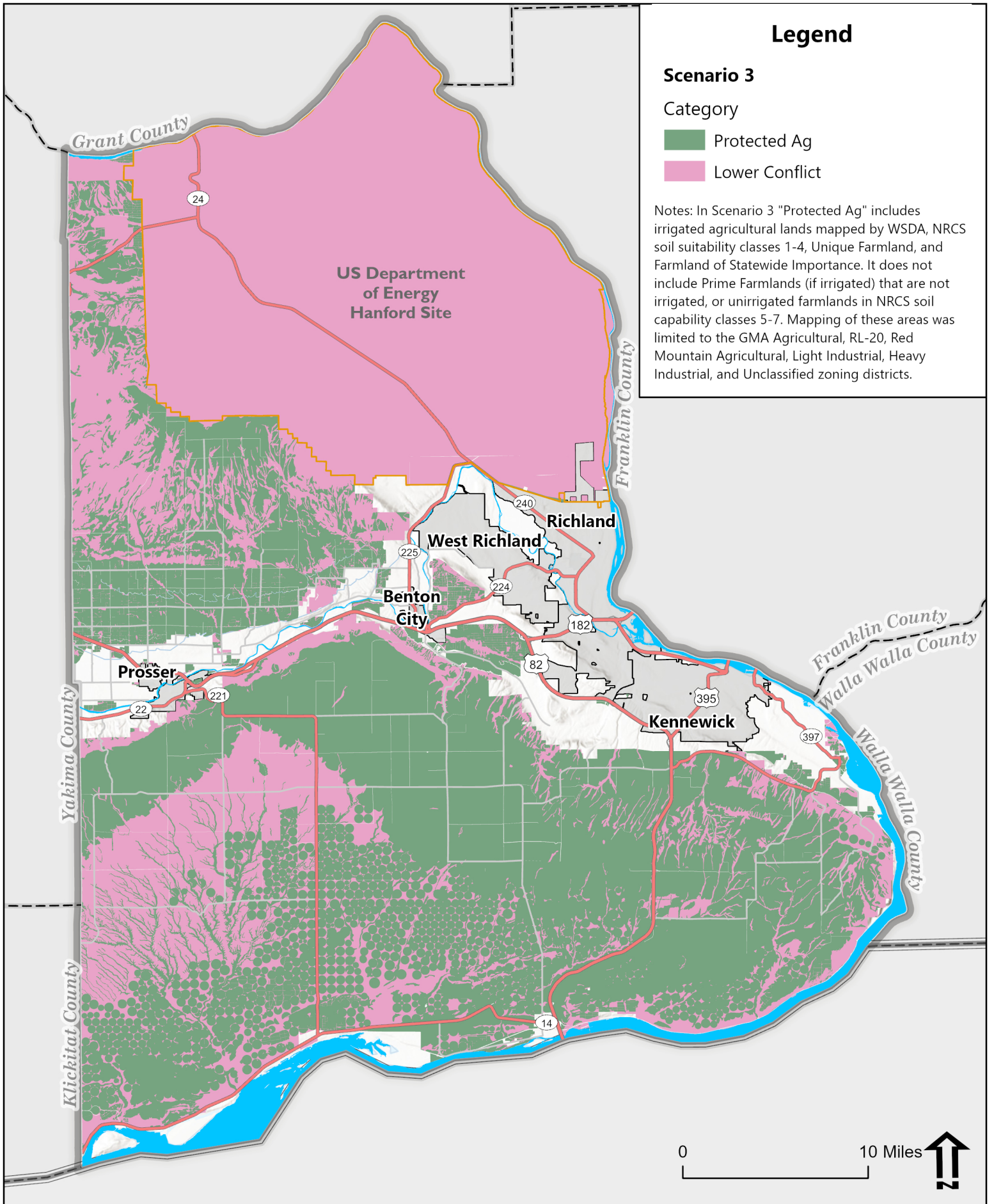
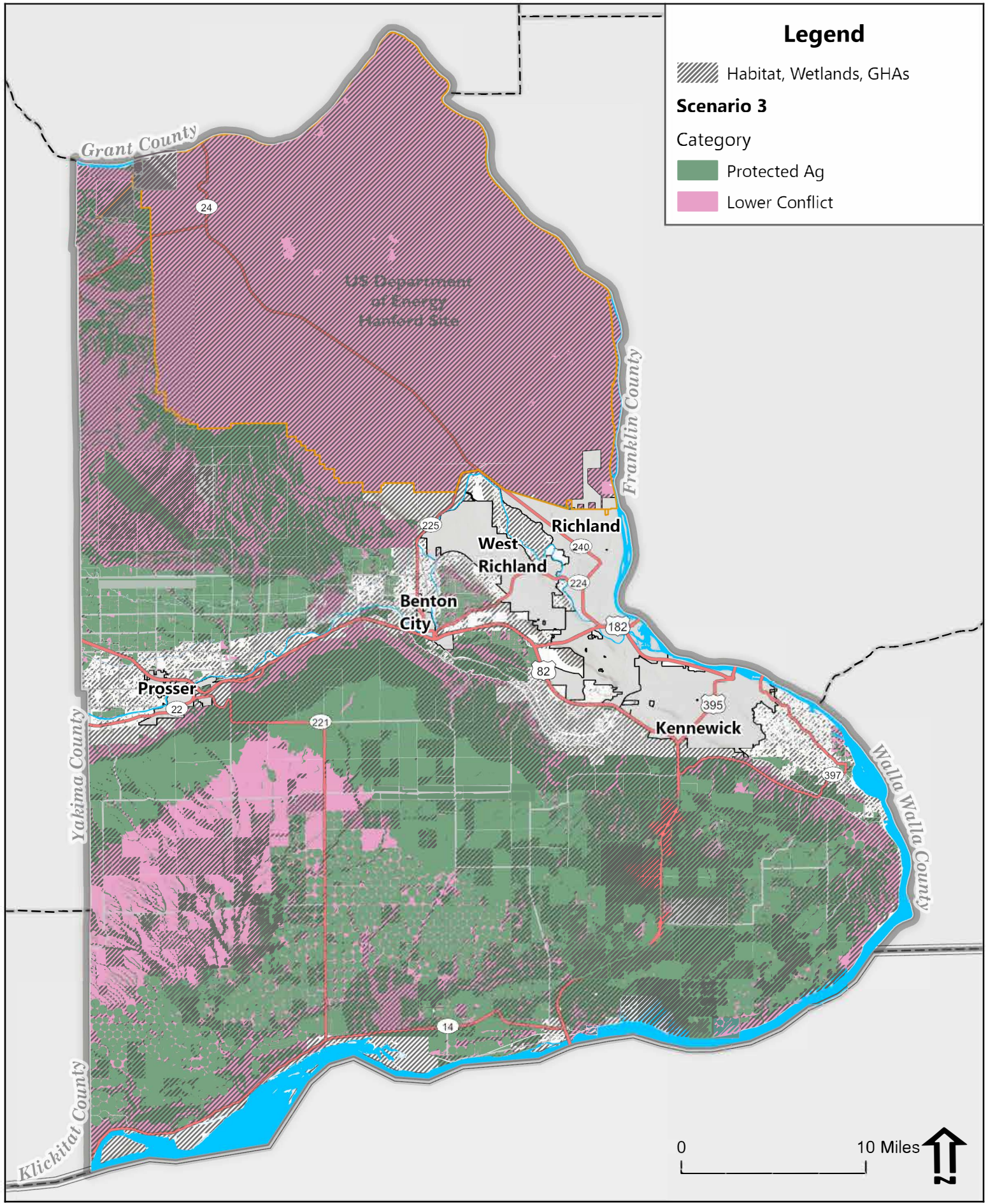


Figure A-11  
Scenario 2 with PHS & GHA





**Figure A-13**  
**Scenario 3 with PHS & GHA**

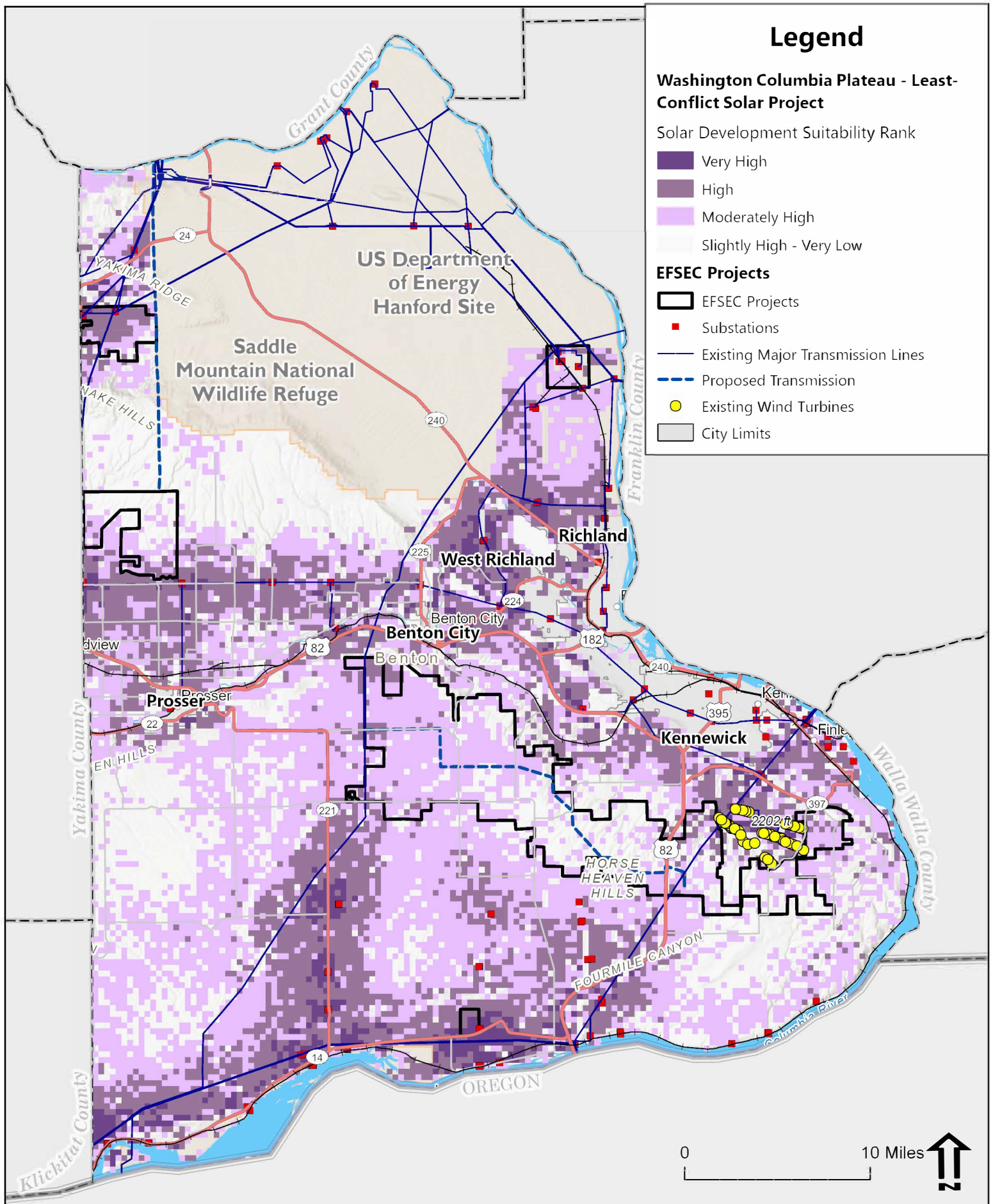
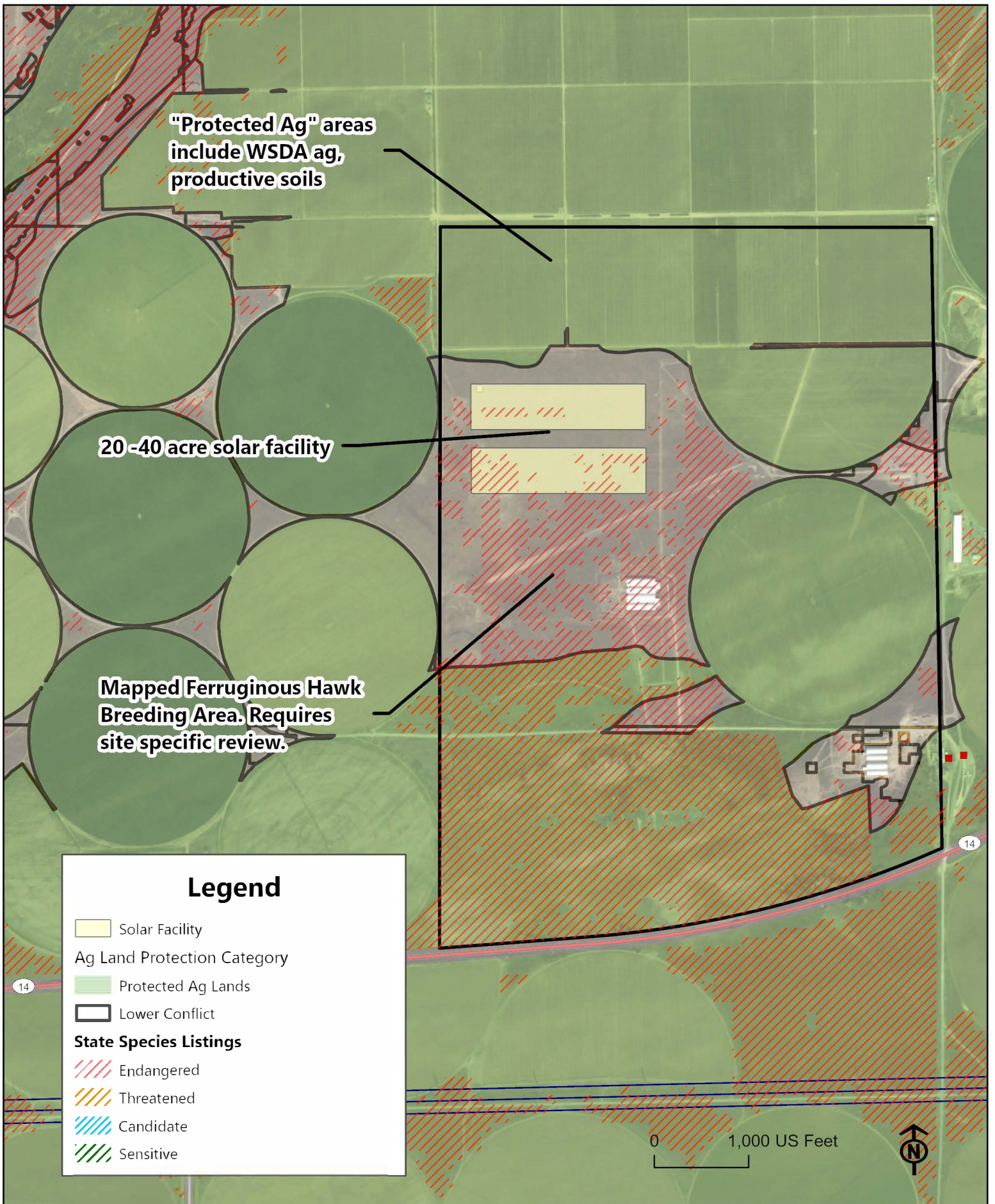


Figure A-14  
WSU Solar Suitability Ranking



# Appendix B

## WDFW Renewable Energy Siting Guidance

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The attached tables were provided by WDFW in March 2025 and are adapted from WDFW's draft guidance titled *Guidelines for Utility-Scale Solar and Onshore Wind Energy Development in Washington State*. The full draft guidelines are expected to be available in summer 2025.

## Exploratory planning tools


There are numerous renewable energy planning tools and landscape mapping systems available to assist with solar or wind project siting, some of which are listed in Tables 2 and 3. These include sources of best available science for renewable energy siting and biological resources in Washington State that should be used for siting purposes, in desktop assessments, and referenced when planning field surveys.

As noted in Tables 2 and 3, some resources are older than others. In general, the resources published more recently or noted as “ongoing”, particularly siting and landscape connectivity resources, offer the most updated information and should be prioritized. However, older resources contain important content about biological resources or management recommendations in WA and should be used when the focus of the resource is of concern on a specific project site. If a discrepancy between comparable resources exists, priority should be given to the most recently updated. Some tools may have been developed with a certain type of renewable energy development in mind (e.g., LCSS), but certain aspects of these tools can be applied to wind energy as noted in Tables 2 and 3.

These resources are subject to change, are not all-inclusive, and do not preclude field verification of biological resources. Please consult with WDFW to determine if you are using the most up-to-date sources.

**Table 2. Exploratory planning tools for siting utility-scale renewable energy projects in WA. Resources highlighted in tan should be used preferentially. Dates depicted in the resource column note when that source was published or last updated. Some sources are designed to be regularly updated and noted as “ongoing”.**

Resource	Link	Description	When to use
Least Conflict Solar Siting (LCSS): Conservation Value Map, 2023	<a href="#">Conservation Value Map   Maps   Least-Conflict Solar Siting (databasin.org)</a>	LCSS Conservation Value Map that depicts relative conservation value for landscapes across the Columbia Plateau. This map accurately highlights conservation concerns. Farmland Value Map, Ranchland Value Map, Solar Development Suitability, and the Composite Map do not accurately represent conservation concerns.	All projects, use this first
Ecological Risk Assessment for Wind Energy Development in Eastern WA, 2011	<a href="#">Eastern Washington Wind Power Conservation Blueprint   Data Basin</a>	The Nature Conservancy’s modeled habitat and targeted avian species report and spatial catalogue for low, medium, and high-risk wind development areas.	 Paired with LCSS Conservation Value Map for wind projects
WA Department of Ecology Programmatic Environmental Impact Statement, 2024	<a href="#">Programmatic EIS - Washington State Department of Ecology</a>	Non-decisional documents for broad-scale and state-wide assessments for areas in the state suitable for green projects and evaluation of potential significant environmental impacts.	All projects

Resource	Link	Description	When to use
Least Conflict Solar Siting (LCSS): Farmland, ranchland, solar suitability 2023	<a href="#">Columbia Plateau Least-Conflict Solar Siting Gateway</a>	This project aims to highlight areas in the Columbia Plateau with potential conflict for utility-scale solar development regarding conservation, farmland, and ranchland. Cultural and tribal resources are not included.	 Farmland, ranchland, and composite maps should be used for solar only
US Bureau of Land Management Programmatic Environmental Impact Statement, 2024	<a href="#">2023/2024 Solar Programmatic EIS Information Center (ani.gov)</a>	This Programmatic EIS updates the Bureau of Land Management (BLM) 2012 Western Solar Plan to support current and future national clean energy goals, long-term energy security, climate resilience, and improved conservation outcomes on BLM managed lands.	If a project intends to occur on or partially on BLM land, including transmission corridors or access roads.
WA Department of Natural Resources Clean Energy Parcel Viewer	<a href="#">Department of Natural Resources Clean Energy Program Parcel Viewer</a>	Created to determine whether state lands may be worthwhile to include in proposed energy project footprints. DNR has pre-screened thousands of state trust properties considering criteria such as electricity generation capability; limiting potential conflicts (e.g., environmental and cultural resources); and consulting with interested parties where existing uses may otherwise be incompatible with potential clean energy siting.	If a project intends to occur on or partially on state-owned land, including transmission corridors or access roads.
WA Department of Commerce Compatible Energy Siting Assessment Tool, 2022	<a href="#">Washington State Compatible Energy Siting Assessment (CESA) Site Consultation Prototype Map Tool</a>	This prototype is designed to promote early and ongoing communication between renewable-energy developers and governmental entities (civilian, military, and tribal) in support of successful site-selection for new facilities.	All projects


### Biological information







The resources listed in Table 3, in coordination with the siting tools in Table 2, can assist with preliminary assessment of biological resources concerns in a project vicinity. Project proponents may not need refer to all resources depending on project location. The 6 resources that all projects should use include:

- Priority Habitats and Species (PHS)
- Washington Shrubsteppe Restoration and Resiliency Initiative (WSRRI)
- Washington Habitat Connectivity Action Plan
- U.S. Fish and Wildlife Service Information for Planning and Consultation (IPaC)
- State Wildlife Action Plan (SWAP)
- WA Department of Natural Resources Natural Heritage Program



These resources are highlighted in tan in Table 3.

**Table 3. Biological resource information that can be used during the exploratory planning phase for utility-scale renewable energy projects in WA. Resources highlighted in tan should be used preferentially. Dates depicted in the resource column note when that source was published or last updated. Some sources are designed to be regularly updated and noted as “ongoing”.**

Resource	Link	Description	When to use
<b>Landscape and Connectivity</b>			
Priority Habitats and Species, ongoing	<a href="#">Priority Habitats and Species (PHS)   Washington Department of Fish &amp; Wildlife</a>	WDFW's primary means of sharing fish, habitat, and wildlife information. The state supreme court has held that PHS is a valid source of best available science in WA State.	All projects
Washington Shrubsteppe Restoration and Resiliency Initiative, 2024	<a href="#">Washington Shrubsteppe Restoration and Resiliency Initiative   Washington Department of Fish &amp; Wildlife</a>	WSRRI Map Portal identifies Spatial Priorities for conservation across the Columbia Plateau and high-quality "core areas" of shrubsteppe that should be preserved.	All projects east of the Cascades.
Washington Habitat Connectivity Action Plan, 2025	<a href="https://wdfw.wa.gov/species-habitats/habitat-recovery/connectivity/action-plan">https://wdfw.wa.gov/species-habitats/habitat-recovery/connectivity/action-plan</a>	This resource maps landscape connectivity through WA and identifies priority locations to improve connectivity.	All projects after publication in 2025
WA Wildlife Habitat State-wide Connectivity Analysis, 2010	<a href="#">Washington Wildlife Habitat Connectivity Working Group » Statewide Analysis (waconnected.org)</a>	Modeled habitat analysis showing landscape connections and resistance corridors for selected wildlife species	If PHS species or habitat concerns are identified after using Table 2 or through coordination with WDFW.
WA Wildlife Habitat Connectivity Working Group: Columbia Plateau Ecoregion, 2015	<a href="https://waconnected.org/columbia-plateau-ecoregion/">https://waconnected.org/columbia-plateau-ecoregion/</a>	A series of detailed connectivity analyses using 11 focal species and 6 vegetation classes of the Columbia Plateau ecoregion that depict areas of relatively low human disturbance and broad landscape connectivity patterns.	If PHS species or habitat concerns are identified after using Table 2 or through coordination with WDFW.
Arid Lands Initiative, 2015	<a href="https://aridlandsinitiative.org/">https://aridlandsinitiative.org/</a>	Priority conservation areas in arid shrubsteppe eastern Washington	If PHS species or habitat concerns are identified after using Table 2 or through coordination with WDFW.
U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines, 2012	<a href="#">Land-Based Wind Energy Guidelines   FWS.gov</a>	This document has been developed by the Interior Department's U.S. Fish and Wildlife Service (Service) working with the Wind Turbine Guidelines Advisory Committee. These voluntary Guidelines provide a structured, scientific process for addressing federal wildlife conservation concerns at all stages of land-based wind energy development.	 Can be used in conjunction with WDFW guidelines.
<b>Wildlife</b>			
U.S. Fish and Wildlife Service Information for Planning and Consultation (IPaC), ongoing	<a href="#">IPaC: Home (fws.gov)</a>	Mapping tool to identify if any species listed under the Endangered Species Act, critical habitat, migratory birds, or other natural resources may be impacted by a project.	All projects

Resource	Link	Description	When to use
State Wildlife Action Plan (SWAP), 2015	<a href="#">State Wildlife Action Plan (SWAP) 2015   Washington Department of Fish &amp; Wildlife</a>	This document is updated approximately every 10 years and is a comprehensive plan for conserving WA state's fish and wildlife and their habitats, particularly <a href="#">Species of Greatest Conservation Need (SGCN)</a> .	If any <b>SWAP species or habitat concerns</b> are identified after using Table 2 or through coordination with WDFW.
WDFW Game Management Plans, 2024	<a href="#">Game management plans   Washington Department of Fish &amp; Wildlife</a>	A comprehensive list of all game management plans developed by WDFW.	If <b>game species/hunting concerns</b> are identified after using Table 2 or through coordination with WDFW.
Big Game Guidelines for Utility-Scale Photovoltaic Solar Development, 2024	<a href="#">ACP Big Game Solar Literature Review</a>	The purpose of this document is to supplement state-specific guidelines and BMPs to provide state wildlife agencies, industry, non-governmental organizations, and members of the public who engage in solar development projects, with additional science-based recommendations specifically for western big game species (i.e., ungulates), including mule deer, elk, and pronghorn.	 If <b>ungulate concerns</b> are identified after using Table 2 or through coordination with WDFW.
USGS Ungulate Migrations of the Western US, 2024	<a href="https://pubs.usgs.gov/sir/2024/5006/sir20245006.pdf">pubs.usgs.gov/sir/2024/5006/sir20245006.pdf</a>	This report details known ungulate migration routes throughout the Western US and can be used to assess impacts of potential developments.	 If <b>ungulate concerns</b> are identified after using Table 2 or through coordination with WDFW.
Western Migrations: Wildlife Corridors and Route Viewer, 2018	<a href="https://www.westernmigrations.net/">https://www.westernmigrations.net/</a>	Mapping tool to identify migration corridors, ranges, stopovers, and routes for ungulates in the Western U.S.	 If <b>ungulate concerns</b> are identified after using Table 2 or through coordination with WDFW.
Energy Development Guidelines for Mule Deer, 2011	<a href="#">Energy Development Guidelines for Mule Deer – WAFWA</a>	This document establishes guidelines for energy development to proceed in a manner that is compatible with habitat requirements of mule and black-tailed deer.	 If <b>mule deer concerns</b> are identified after using Table 2 or through coordination with WDFW.
WDFW Mule Deer Management Plan, 2016	<a href="#">Washington State Mule Deer Management Plan   Washington Department of Fish &amp; Wildlife</a>	The plan provides background information on the natural history, biology, and status of mule deer herds in Washington State, describes current management issues, and establishes objectives and strategies to guide future management.	 If <b>mule deer concerns</b> are identified after using Table 2 or through coordination with WDFW.
WDFW White-tailed Deer Management Plan, 2010	<a href="#">Washington State Deer Management Plan: White-tailed Deer   Washington Department of Fish &amp; Wildlife</a>	The purpose of this plan is to prescribe near-term direction for managing white-tailed deer in Washington.	 If <b>white-tailed deer concerns</b> are identified after using Table 2 or through coordination with WDFW.
Western Association of Fish and Wildlife Agencies Range-	<a href="https://wafwa.org/wpdm-package/range-wide-guidelines-black-tailed-mule-deer-seeding-">wafwa.org/wpdm-package/range-wide-guidelines-black-tailed-mule-deer-seeding-</a>	Guidelines for the reseeding and restoration for ungulate habitat in the Western U.S.	If <b>deer concerns</b> are identified after using Table 2 or through coordination with WDFW.

Resource	Link	Description	When to use
wide Guidelines for Seeding Mule Deer and Black-tailed Deer Habitat, 2022	<a href="#">booklet-2022/?wpdmdl=24677&amp;refresh=66db7f954bd621725661077</a>		
Pygmy rabbit, 2018	<a href="#">Periodic Status Review for the Pygmy Rabbit in Washington (2018)   Washington Department of Fish &amp; Wildlife</a>	Status, distribution, conservation concerns, and management activities of the Pygmy rabbit in Washington.	If <b>pygmy rabbit concerns</b> are identified after using Table 2 or through coordination with WDFW.
Western gray squirrel, 2023	<a href="#">Periodic Status Review for the Western Gray Squirrel (2023)   Washington Department of Fish &amp; Wildlife</a>	Status, distribution, conservation concerns, and management activities of the Western gray squirrel in Washington.	If <b>western gray squirrel concerns</b> are identified after using Table 2 or through coordination with WDFW.
Mazama pocket gopher, 2020	<a href="#">Mazama Pocket Gopher Recovery Plan and Periodic Status Review (2020)   Washington Department of Fish and Wildlife</a>	Status, distribution, conservation concerns, and management activities of the Mazama pocket gopher in Washington.	If <b>Mazama pocket gopher concerns</b> are identified after using Table 2 or through coordination with WDFW.
Raptors, ongoing	<a href="#">Global Raptor Information Network (globalraptors.org)</a>	Database and catalog of raptor resources created and managed by The Peregrine Fund.	If <b>raptor concerns</b> are identified after using Table 2 or through coordination with WDFW.
Ferruginous hawk, 2024	<a href="#">Periodic Status Review for the Ferruginous Hawk (2021)   Washington Department of Fish &amp; Wildlife</a>	Status, distribution, conservation concerns, and management activities of the Ferruginous hawk in Washington.	If <b>ferruginous hawk concerns</b> are identified after using Table 2 or through coordination with WDFW.
	<a href="#">Management Recommendations for Washington's Priority Species: Ferruginous Hawk (2024)   Washington Department of Fish &amp; Wildlife</a>	Natural history information, limiting factors, and management recommendations for Ferruginous hawk in Washington.	If <b>ferruginous hawk concerns</b> are identified after using Table 2 or through coordination with WDFW.
Sharp-tailed grouse, 2017	<a href="#">Periodic Status Review for the Columbian Sharp-tailed Grouse in Washington (December 2017)   Washington Department of Fish &amp; Wildlife</a>	Status, distribution, conservation concerns, and management activities of the Columbian sharp-tailed grouse in Washington.	If <b>sharp-tailed grouse concerns</b> are identified after using Table 2 or through coordination with WDFW.
Greater Sage-grouse, 2021	<a href="#">Periodic Status Review for the Greater Sage-grouse in Washington (Apr 2021)   Washington Department of Fish &amp; Wildlife</a>	Status, distribution, conservation concerns, and management activities of the Greater sage-grouse in Washington.	If <b>greater sage-grouse concerns</b> are identified after using Table 2 or through coordination with WDFW.

Resource	Link	Description	When to use
Oregon vesper sparrow, 2021	<a href="#">Status Report for the Oregon Vesper Sparrow   Washington Department of Fish &amp; Wildlife</a>	Status, distribution, conservation concerns, and management activities of the Oregon vesper sparrow in Washington.	If <b>Oregon vesper sparrow concerns</b> are identified after using Table 2 or through coordination with WDFW.
Marbled murrelet, 2016	<a href="#">Periodic Status Review for the Marbled Murrelet in Washington (2016)   Washington Department of Fish &amp; Wildlife</a>	Status, distribution, conservation concerns, and management activities of the Marbled murrelet in Washington.	If <b>marbled murrelet concerns</b> are identified after using Table 2 or through coordination with WDFW.
Streaked horned lark, 2016	<a href="#">Washington State Periodic Status Review for the Streaked Horned Lark (2016)   Washington Department of Fish &amp; Wildlife</a>	Status, distribution, conservation concerns, and management activities of the Streaked horned lark in Washington.	If <b>streaked horned lark concerns</b> are identified after using Table 2 or through coordination with WDFW.
Monarchs, 2018	<a href="#">Managing for Monarchs in the West   Xerces Society</a>	Guidance on how to manage existing monarch breeding and migratory habitat developed by the Xerces Society for Invertebrate Conservation.	 If <b>monarch or milkweed concerns</b> are identified after using Table 2 or through coordination with WDFW.
Best Management Practices for Pollinators on Western Rangelands, 2018	<a href="https://xerces.org/publications/guidelines/best-management-practices-for-pollinators-on-western-rangelands">https://xerces.org/publications/guidelines/best-management-practices-for-pollinators-on-western-rangelands</a>	Best practices on incorporating pollinator-friendly practices into rangeland management and restoration.	 If <b>invertebrate or other pollinator concerns</b> are identified after using Table 2 or through coordination with WDFW.
<b>Habitat and Plants</b>			
WA Department of Natural Resources Natural Heritage Program, ongoing	<a href="#">Species Lists   WA - DNR</a>	Lists of vascular plants and nonvascular species of conservation concern in WA.	<b>All projects</b>
	<a href="#">Online Field Guide to the Rare Plants of Washington   WA - DNR</a>	Field guide to rare plants of Washington. Provides information on conservation status, range, phenology, identification, and more.	<b>All projects</b>
PHS Local Government User Guide: Shrubsteppe and Eastside Steppe Map, 2023	<a href="#">PHS User Guide - Shrubsteppe and Eastside Steppe Map (wa.gov)</a>	This document contains information about the classification of shrubsteppe and eastside steppe habitat in the Columbia Plateau and provides general maps to show the extent of these habitat types.	If <b>shrubsteppe, eastside steppe, or Palouse Prairie concerns</b> are identified after using Table 2 or through coordination with WDFW.
Site-specific Management: Shrubsteppe, 2020	<a href="#">Site-Specific Management: How to Avoid and Minimize Impacts of Development for Shrubsteppe (wa.gov)</a>	Supplemental information on incorporating shrubsteppe impacts into habitat management plans.	If <b>shrubsteppe concerns</b> are identified after using Table 2 or through coordination with WDFW.

Resource	Link	Description	When to use
Shrubsteppe Management and Assessment Protocol, 2020	<a href="#">Management Recommendations for Washington's Priority Habitats: Shrubsteppe</a>	Management guidance for shrubsteppe habitat. This guide contains a shrubsteppe Ecological Integrity Assessment protocol: Appendix 9.	If <b>shrubsteppe concerns</b> are identified after using Table 2 or through coordination with WDFW.
Shrubsteppe and Grassland Restoration Manual, 2011	<a href="https://wdfw.wa.gov/sites/default/files/publications/01330/wdfw01330.pdf">https://wdfw.wa.gov/sites/default/files/publications/01330/wdfw01330.pdf</a>	Technical manual focused on shrubsteppe and grassland restoration in the Columbia Plateau.	If <b>shrubsteppe, eastside steppe, or Palouse Prairie concerns</b> are identified after using Table 2 or through coordination with WDFW.
Oregon white oak, 2024	<a href="#">Best management practices for mitigating impacts to Oregon white oak priority habitat   Washington Department of Fish &amp; Wildlife</a>	Management and mitigation guidance for Oregon white oak in WA.	If <b>Oregon white oak concerns</b> are identified after using Table 2 or through coordination with WDFW.
Inland dunes, 2007	<a href="#">Conservation Strategy for Washington State Inland Sand Dunes (2007)   Washington State Department of Natural Resources</a>	Management recommendations, conservation, and ecology of Inland dune ecosystems in Washington.	If <b>inland dune concerns</b> are identified after using Table 2 or through coordination with WDFW.