

Benton County 2026 Comprehensive Plan Update – EIS Scoping Comment Response Matrix

Comment No.	Commenter	Comment	Response
EIS Alternatives			
1	Evan Edwards, Benton PUD	<p><u>Renewable Energy</u> How much of the renewable power generated would stay locally? Benton PUD doesn't buy any of it; they buy from BPA. The initial construction and permits are what generate the money up front. The efficacy factor of a windfarm in this part of the state is about 8 megawatts per year, although the capacity might be up to 10 times that amount</p> <p>PUD has to be involved since they provide retail service. The PUD did submit comments to EFSEC against the wind farms project.</p>	Thank you for the comments. We will consider this input as we summarize existing conditions and plan how and where renewable and other future energy projects might be considered in the County, and identify associated impacts.
2	Evan Edwards, Benton PUD	<p><u>Housing</u> I am more along the lines of Alternative 3 and am curious how low-income housing will expand outside unincorporated parts of the cities and county.</p>	Thank you for the comment. Opportunities and challenges for low-income housing in unincorporated Benton County will be characterized in the Housing Section of the EIS.
3	Emily Adkins,	<p><u>Wetland Guidance for Critical Areas Ordinance (CAO) Updates</u></p>	Benton County has updated its CAO in accordance with the latest Ecology guidance from October 2022,

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	Department of Ecology	<p>In October 2022, Ecology published a document providing guidance and example language for updating the wetland chapter of your Critical Area Ordinance. It includes:</p> <ul style="list-style-type: none"> • An updated and expanded minimization measures table for use with the buffer tables • Improved correlation between the discussion and the sample regulations • A new section on functionally disconnected buffers • Clarification on corridor requirements and expanded applicable • Recommendations from the 2021 interagency wetland mitigation guidance document. 	<p>including the referenced provisions for wetlands. Benton County will further consult the guidance to ensure consistency with Ecology’s recommendations.</p>
4	Emily Adkins, Department of Ecology	<p><u>Washington State Rating Systems</u> Ecology has updated the Washington State Wetland Rating Systems for western Washington. The western Washington rating system was amended in 2023. The eastern Washington rating system is currently waiting to be amended. The current version of the eastern Washington rating system (Ecology Publication #14-06-030) remains valid. These amendments provide a more accurate characterization of wetland functions based on the most recent science. If citing the Ecology document publication number for western Washington’s rating system, please use Ecology Publication #23-06-009. If your CAO requires the use of the 2004 rating systems, you may want to consider updating your CAO to require the use of the 2014 version as revised.</p>	<p><u>Washington State Rating System</u> Benton County has updated its CAO to incorporate the 2014 eastern Washington Wetland Rating System (Ecology Publication #14-06-030). Therefore, no additional updating of the rating system is necessary at this time. Benton County will incorporate the latest eastern Washington Wetland Rating System, as applicable, in the future.</p>

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5	Emily Adkins, Department of Ecology	<p><u><i>Determining Wetland Buffers</i></u> For the 2024-2027 GMA update cycle, we are not proposing any changes to the recommended wetland buffer widths but have clarified some suggested criteria such as habitat corridors and minimization measures associated with buffer reductions. Buffer tables can be found in our most current CAO guidance document: Wetland Guidance for Critical Area Ordinance (CAO) Updates: Western and Eastern Washington</p>	<p>Benton County has updated its CAO in accordance with the latest Ecology guidance, including the Wetland Guidance for Critical Area Ordinance Updates: Eastern Washington. Benton County will coordinate with Ecology to evaluate proposed changes to ensure consistency with this guidance.</p>
6	Emily Adkins, Department of Ecology	<p><u><i>Mitigation Tools</i></u> In coordination with the U.S. Army Corps of Engineers and the Environmental Protection Agency, Ecology has recently updated Part 1 of Wetland Mitigation in Washington State (insert publication number). Ecology has also developed a number of mitigation tools since the first publication of Wetland Mitigation in Washington State Parts 1 and 2 in 2006. Ecology has developed a credit-debit tool for calculating when a proposed wetland mitigation project adequately replaces the functions and values lost when wetlands are impacted. This optional tool is designed to provide an objective method for assessing mitigation adequacy for both regulators and applicants during the mitigation process. You may want to include language that allows the use of the credit-debit method in your CAO.</p> <p>The federal rule on compensatory mitigation requires that some type of watershed approach be used in siting mitigation. Ecology, the US Army Corps of Engineers, and the Environmental Protection Agency</p>	<p>Benton County will review and incorporate the suggested mitigation guidance documents as applicable, including the credit-debit method for calculating adequate wetland mitigation for impacts to functions and values, as referenced in Part 1 of Wetland Mitigation in Washington State.</p> <p>Additionally, Benton County will review the referenced document Selecting Wetland Mitigation Sites Using a Watershed Approach (Western Washington) and incorporate as appropriate.</p> <p>Benton County will review and consider including language in the CAO regarding the applicability of the use of wetland banks and in-lieu fee (ILF) programs as compensation for unavailable wetland impacts in coordination with Ecology.</p>

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		<p>have developed guidance to help applicants select potential off-site mitigation sites. To download a copy of Selecting Wetland Mitigation Sites Using a Watershed Approach (Western Washington), (Ecology Publication #09-06-032, December 2009), please see https://fortress.wa.gov/ecy/publications/summarypages/0906032.html. Referring to this guidance in your CAO would assist applicants proposing mitigation for development projects.</p> <p>You should consider including language in your CAO that allows the use of wetland banks and in-lieu fee (ILF) programs as compensation for unavoidable wetland impacts. To learn more about these approaches to mitigation, see Ecology's website at https://ecology.wa.gov/water-shorelines/wetlands/mitigation.</p> <p>Ecology, WDFW, and the US Army Corps of Engineers have developed guidance to help applicants develop advance mitigation proposals. Advance mitigation is used only by a single applicant to compensate for a specific project (or projects) with pre-identified impacts to wetlands. To download a copy of Interagency Regulatory Guide: Advance Permittee-Responsible Mitigation (Ecology Publication #12-06-015, December 2012), please see https://fortress.wa.gov/ecy/publications/SummaryPages/1206015.html. Your CAO could reference this guidance to assist applicants who are considering this option.</p>	<p>Benton County will review and consider including, as relevant, the referenced Interagency Regulatory Guide: Advance Permittee-Responsible Mitigation in relevant county guidance for applicants.</p>
7	Emily Adkins,	<p><u><i>Small Cities Option to Adopt County CAO</i></u> In 2023 SB 5374 was passed, which allows cities with populations under 25,000 to adopt the county's critical area ordinance by</p>	<p>Benton County will share this comment with the small cities, so they are aware of the opportunity to work</p>

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	Department of Ecology	<p>reference as long as the CAO is not under appeal. Once adopted by reference, the city is not required to take further action during future GMA periodic updates. Counties are entitled to a portion of the city's grant funding that otherwise would have been used to update their CAOs. The cities must still submit their adoption by reference through Department of Commerce for 60-day review. For more information please reach out to the Department of Commerce.</p> <p><u>Small Cities Guidance</u> In the past, Ecology provided separate guidance for wetland CAO's in small cities. This guidance was incorporated into our <u>2022 Wetland Guidance for Critical Areas Ordinance (CAO) Updates</u></p>	with Ecology to address and incorporate latest wetland guidance for small cities, as applicable.
8	Emily Adkins, Department of Ecology	<p><u>Frequently Flooded Area</u> Ecology's regional floodplain specialists are available to provide assistance to local governments with Frequently Flooded Areas (FFAs). The attached PDF shows a map of the state with the names, contact information, and county assignments for each of our five our regional floodplain specialists. Please reach out to your assigned specialist if you have any questions regarding FFAs.</p>	Benton County will collaborate with Ecology's regional floodplain specialists to assist with Frequently Flooded Areas (FFAs), as applicable.
9	Scott Downes, Washington Department of Fish and	<p><u>Riparian Management Zones (RMZ)</u> WDFW recommends designating these areas Riparian Management Zones (RMZs) rather than buffers as currently written. WDFW appreciates that some updates to the RMZ widths were made in 2021. WDFW notes that according to WDFW's Riparian Ecosystem, Volume 2: Management Recommendations, the RMZ should be</p>	Buffers in the draft Benton County Code have been designed to protect existing ecological functions and values based on locally developed Best Available Science (BAS) studies in 2021. Benton County will further evaluate its RMZs and the information provided

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	Wildlife (WDFW)	<p>defined as the greater of either Site Potential Tree Height (SPTH) at 200 years or where SPTH is less than 100-foot, a minimum of a 100-foot width for pollutant removal for all naturally occurring water bodies (streams and ponds) with the Columbia Basin Ecosystem (which includes all of Benton County).</p> <p>WDFW recommends two changes to the existing RMZ widths. The first recommended change is some streams are within the range where Black Cottonwood can reach a mature height greater than 100-foot. WDFW recommends increasing the RMZ in these areas to the SPTH of Black Cottonwood. The second recommended change is WDFW notes that while it is appreciated that steeper slope (>10%) areas for both fish-bearing and non-fish-bearing streams have an RMZ of 100-foot and that recognizes the higher potential for pollutant run-off in steeper slopes, stream banks of less than 10% particularly in areas of high development such as urban or agricultural can be also be subject to pollutants. We recommend increasing these stream reaches to a minimum of 100-foot RMZ as well.</p> <p>WDFW recognizes that in some instances the already built environment in these RMZs may encumber full protection of the RMZs. WDFW recommends that the RMZ widths be identified in these areas and management tools such as buffer averaging, variances, vegetation management plans etc., can be used to manage appropriately in these urban environments. As noted in WDFD Riparian Guidelines, Volume 2, designation of these RMZs are the first</p>	<p>in the WDFW-referenced BAS sources, and prepare a BAS memo addendum describing in more detail how we are applying BAS to Benton County conditions, including additional detail on what specific provisions were considered in applying BAS to updated buffers, including reasoned application of BAS for County conditions. We will coordinate with WDFW during this process.</p>

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		step and some management to facilitate development while still maintaining RMZ function is appropriate. WDFW would be happy to work with Benton County through some of these more challenging scenarios.	
10	Scott Downes, Washington Department of Fish and Wildlife (WDFW)	<p><u>Shrubsteppe mitigation</u></p> <p>WDFW notes that only Alternative 3 lists a shrubsteppe mitigation program to preserve shrubsteppe habitat and other priority habitats in the county. WDFW recommends that this program be included in any alternative developed by the county. A mitigation program should be designed to follow mitigation sequencing of avoid, minimize and ultimately mitigate impacts that cannot be avoided or minimized. Development of such a mitigation program will be vital to help achieve the no-net loss ecosystem standard set in WAC 365-196-830. WDFW encourages Benton County to apply this program to all impacts to shrubsteppe habitat, not just renewable energy projects. WDFW welcomes the opportunity to work with the county to develop the program and to identify areas to prioritize for compensatory mitigation.</p>	<p>Benton County will collaborate with WDFW to incorporate the latest guidance for shrubsteppe mitigation and also in identifying specific properties to target for long-term protection.</p> <p>Further, Alternative 2 will be updated to include reference to minimization and mitigation for all project impacts to shrubsteppe and other critical areas on a project by project basis. However, Alternative 2 will still differ from Alternative 3, as Alternative 3 will include a specific county-wide shrubsteppe mitigation program.</p>
11	Scott Downes, Washington Department of Fish and Wildlife (WDFW)	<p><u>Renewable Energy Overlay Zone</u></p> <p>A renewable energy overlay zone is proposed under Alternative 2. There are several landscape tools that WDFW recommends that Benton County use in the development of the zone to ensure protection of priority fish and wildlife species and their habitats. Least Conflict Solar Siting is a landscape evaluation tool that includes many of the WDFW PHS layers under the Conservation Values mapping</p>	<p>In developing potential renewable energy overlay zones in Alternatives 2 and 3, Benton County has reviewed and incorporated the referenced Least Conflict Solar Siting landscape tool, including the Conservation Values spatial layers. Benton County has met with WDFW renewable energy program staff to</p>

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		<p>exercise. Washington Shrubsteppe Restoration and Resiliency Initiative (WSRRI) developed spatial priorities to prioritize both shrubsteppe restoration goals along with areas determined to warrant priorities for preservation (labeled as core areas on the maps). Finally, Washington State is developing a Habitat Connectivity Action Plan (WAHCAP), to be finalized in June 2025 where wildlife habitat connectivity priorities are identified for protection, restoration and enhancement. WDFW recommends incorporating these landscape level tools into the overlay process, and we would welcome the ability to work with the county on how best to incorporate these layers into the process to avoid impacts to priority habitats and species to the highest degree possible.</p> <p>The overlay zone should incorporate an analysis of the maximum area that could be permitted within the zone and include the area within that zone where projects could be permitted within critical area impacts, particularly priority habitat and species areas. The analysis should also include whether there are available resources and areas within Benton County available to mitigate critical area impacts with a full build out of the energy overlay zone. This analysis should ensure that the impacts to priority habitats and species are able to be mitigated through the associated mitigation program. In addition to the landscape tools described above, WDFW PHS program has several management guidelines regarding shrubsteppe or shrubsteppe priority species that can be relevant in assessing these impacts; PHS Shrubsteppe Management Recommendations and PHS</p>	<p>review and incorporate applicable PHS habitat and WSRRI layers into the development of the energy overlays.</p> <p>Once available, Benton County will review the information found in the Habitat Connectivity Action Plan and incorporate the information into potential renewable energy overlay zone, as applicable.</p> <p>Benton County's review of potential renewable energy overlay zones will include analysis of the area within any proposed zone that intersects with applicable critical areas, including PHS. Consideration of any renewable energy overlay zones will be included within Benton County's mitigation programs and/or site-specific project requirements</p> <p>Benton County will also review and incorporate the information found in the upcoming WDFW Solar and Wind Guidelines as part of its development of energy overlays, as available.</p> <p>Benton County will continue to engage with WDFW in the development of its renewable energy overlays.</p>

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		<p>Management Recommendations for Ferruginous Hawk (State Endangered Species).</p> <p>In addition to the overall zone process, WDFW is preparing Solar and Wind Guidelines to help inform these projects on how to avoid, minimize and mitigate impact to fish and wildlife species. These guidelines should be published in 2025. WDFW recommends that Benton County includes a provision in the Comprehensive Plan that any solar or wind projects permitted at the county level should be consistent with WDFW Solar and Wind Guidelines.</p>	
12	Scott Downes, Washington Department of Fish and Wildlife (WDFW)	<p><u>Washington State Habitat Connectivity Action Plan</u></p> <p>WDFW in cooperation with Washington State Department of Transportation (WSDOT) is developing WAHCAP that outlines priority locations and actions for terrestrial wildlife species at both a transportation and landscape level scale. In addition to incorporating the plan into renewable energy zoning described above, WDFW also recommends incorporation of the plan into the Goals and Policies of various elements of the Comprehensive Plan such as Land Use, Natural Resource Lands, Critical Areas, Transportation Element and Parks, Recreation, Open Space element. WDFW appreciates that the county has already incorporated wildlife connectivity into several elements of the existing plan such as Goals and Policies within the Critical Areas and Parks, Recreation and Open Space elements. WDFW would be happy to work with the county to further incorporate relevant aspects of WAHCAP after it is finalized in June</p>	<p>Benton County will review and incorporate, when available, the WAHCAP as part of the development of its renewable energy overlay zones. Benton County will also review the WAHCAP and collaborate with WDFW to continue to strengthen its wildlife habitat protection and connectivity strategies as part of the Comprehensive Plan and associated development regulation updates.</p>

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		2025, including but not limited to incorporation into various Goals and Policies and designation of priority areas on relevant maps.	
13	Scott Downes, Washington Department of Fish and Wildlife (WDFW)	<p><u>Washington Shrubsteppe Restoration and Resiliency Initiative</u></p> <p>Washington State published the long-term strategy of WSRRRI in March 2024. The strategy was focused on both preserving existing priority shrubsteppe areas and restoring areas that had been degraded in the past due to fire or other elements. WDFW recommends incorporating elements of WSRRRI into several elements of the Comprehensive Plan update. In addition to using the spatial mapping to help designate appropriate areas for renewable energy zoning, these spatial maps and associated language can also be used to give guidance on appropriate areas for further development in the county that will not have substantial impacts on the shrubsteppe environment. Elements of the strategy also speak to both climate and fire that can be used in the climate resiliency element of the Comprehensive Plan update and the Wildfire Protection Plan. Currently the Wildfire Protection Plan does not address fire impacts to species and habitats and WDFW believes that incorporating elements from WSRRRI could help strengthen those connections.</p>	Benton County will collaborate with WDFW to incorporate the long-term strategy of WSRRRI into its shrubsteppe protection and mitigation strategies.. Additionally, Benton County will coordinate with Cascadia Consulting (Climate Resiliency lead) on how to consider WSRRRI data to enhance the climate resiliency element of the Comprehensive Plan as well as the Wildfire Protection Plan.
14	Scott Downes, Washington Department of Fish and Wildlife	<p><u>Open Space and Critical Areas Interaction</u></p> <p>WDFW encourages Benton County to include Goals and Policies in the Comprehensive Plan that encourage development away from critical areas and when there are critical areas within the subject parcels, using elements such as cluster development or Transfer of Development Rights to preserve critical areas through open space.</p>	Benton County will review its Goals and Policies in the Comprehensive Plan update related to open space within and between UGAs. This will include review of critical areas and connections between critical areas. A component of this review will utilize landscape tools, such as WSRRRI and WAHCAP (once available). Benton

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	Wildlife (WDFW)	Landscape tools such as WSRRRI and WAHCAP can help to identify areas to preserve open space. While open space can serve many roles from recreation to wildlife habitat, WDFW recommends a natural open space designation where these areas overlap with critical areas, particularly fish and wildlife habitat areas. WDFW believes this is consistent with the current Parks and Open Space Goal 2, Policy 1. Some limited recreation can be consistent within habitat areas, but heavy recreational use can lead to avoidance of wildlife using these areas. Adding in a policy that if fences are placed into these natural open space designated areas, using wildlife friendly fencing is encouraged to facilitate unencumbered wildlife movement.	County will consider various open space and critical area interactions in reviewing its land use designations and any policy updates as identified by WDFW.
15	Scott Downes, Washington Department of Fish and Wildlife (WDFW)	<u>Water Conservation and Native Plantings</u> Benton County is part of the Yakima River Basin watershed that is currently in its third consecutive year of drought. Water conservation can help to alleviate conflicts between irrigation needs and instream flows for fish. WDFW encourages incorporation of Goals and Policies that encourage water conservation. These elements are likely also applicable under the Climate Resiliency element. An element that can lead to water conservation and improve habitat for wildlife is to encourage native plants, suited for the Columbia Basin for both developed areas and open space areas whenever possible.	Benton County will address ways to further promote water conservation in the plan.
16	Scott Downes, Washington Department	<u>Urban Growth Area (UGA) Modifications</u> WDFW would like Benton County to clarify in the EIS if any modifications (expansions, contractions or swaps) to UGAs within Benton County are planned. Identifying if any modifications are	Benton County has learned recently that Benton City is considering a potential UGA change and will coordinate with the City on their proposal and see that

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	of Fish and Wildlife (WDFW)	planned to accommodate changes in growth and development would be applicable to identify within this EIS and subsequently if any of those changes would potentially result in impacts on critical areas.	this is also shared with WDFW. No other cities are proposing UGA changes that we are aware of.