

## MEMORANDUM

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**To:** Greg Wendt and Michelle Mercer, Benton County  
**Date:** May 13, 2025

**From:** Cara Cares, AC Geo and Ben Floyd, White Bluffs Consulting  
**Project:** Benton County Comprehensive Update

**Cc:**

**Re:** 2026 Environmental Impact Statement (EIS) Scoping Summary

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### Introduction

The purpose of this document is to summarize the comments received during the State Environmental Policy Act (SEPA) public scoping period of the 2026 Comprehensive Plan and Development Regulations Update Environmental Impact Statement (EIS), and to identify the EIS alternatives and areas of investigation that will be included in the EIS. Attachment B lists the comments received during the scoping period.

### Description of Proposal

Benton County is undertaking a Comprehensive Plan and Development Regulations Update (the “Plan”) to cover the 20-year period through 2046, in accordance with the Growth Management Act (GMA). The Plan is Benton County’s primary policy document for guiding growth and development in unincorporated Benton County and consists of goals, policies, and analyses of the following elements and sub-elements: land use, natural resources (water, resource lands, critical areas, and shorelines), economics, housing, transportation, parks and recreation, capital facilities, and utilities. Benton County is required to complete its review and update of the Plan elements, development regulations, and Urban Growth Areas (UGAs) by June 30, 2026. As part of the periodic update, Benton County must evaluate how it can achieve its growth targets for population, housing units, and employment. The updated Plan will contain vision, goals, and policies; analyses of future growth for residential, commercial, industrial, and new energy facilities; and updates to the elements previously described to comply with GMA. Additionally, Benton County will formulate a new climate change and resiliency element into the Plan. Development regulations may also be amended as necessary.

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## **Environmental Review of the Proposal**

Benton County has determined that the proposed Plan update and UGA review may have significant adverse impacts on the environment. Therefore, an EIS will be prepared. Benton County is the lead agency for SEPA review within the unincorporated County.

*Planning Level Review:* An EIS that evaluates planning-level proposals, such as changes to a comprehensive plan or development regulations, is referred to as a programmatic or non-project EIS. It does not evaluate impacts associated with a specific development project. Because implementation of land use plans, policies, and regulations can result in a range of impacts to the built and natural environment from development occurring consistent with them, a programmatic EIS focuses on order-of magnitude analyses. The Plan EIS will contain a programmatic analysis of potential environmental impacts associated with each of the proposed alternatives.

Benton County, in coordination with the cities, will allocate growth to UGAs and to unincorporated County lands located outside UGAs in the Plan update process. Growth patterns across the county and cities will be reviewed in the EIS. The EIS analysis will consider cumulative growth patterns impacts across the county, including within UGAs. The amendment of Benton County's plans and regulations, and their effect on unincorporated areas, will also be reviewed.

## **Scoping Process**

Agencies, affected tribes, and members of the public were invited to comment on the scope of the EIS. The Request for Comment on Scope of Programmatic Environmental Impact Statement (EIS) for the Periodic Update to the Benton County Comprehensive Plan is attached as Attachment A. Comments were requested on alternatives, mitigation measures, probable significant adverse impacts, and licenses or other approvals that may be required. The scoping comment period ran from March 26, 2025 through April 25, 2025. A scoping public hearing was held on April 8, 2025 at 6:00 PM in Prosser, WA at the Benton County Courthouse. Benton County and the consultant team provided background on the EIS and the drafted alternatives. Members of the public were given opportunities to provide oral testimony and written comments on the scope of the EIS.

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### Scoping Comments Received

The following is a general summary of comments received during the EIS scoping comment period. A list of all comments and Benton County's responses can be found in Attachment B. A total of three comments were received during the comment period. Two comments were received by email, and one person provided oral testimony at the scoping public hearing. All comments were provided by agencies:

- Comments on alternatives related to shrub steppe protection, restoration, and resiliency
- Comments on using latest agency guidance documents for updating critical area code elements (wetlands, frequently flooded areas and fish and wildlife habitat conservation areas)
- Comments on how low-income housing will be expanded in the unincorporated County
- Comments related to renewable energy, including incorporation of agency landscape tools to ensure protection of priority fish and wildlife species and their habitats.
- Comments on the interaction between open space and critical areas to encourage development away from critical areas
- Comments on using latest agency guidance documents for designating and updating Riparian Management Zones (RMZ) and RMZ widths

*Comparative Alternatives.* A comparative evaluation of alternative courses of action will be included in the EIS. The alternatives include a no-action alternative and two other alternatives that would consider different growth levels and/or patterns. These alternatives are slightly updated from the description provided in the county-published SEPA scoping notice, to reflect scoping comments received.

*Alternative 1, No Action/No Change in Current Growth Patterns:* This alternative would maintain the County's existing Comprehensive Plan without modifications. This means growth would be expected based on past trends, but no land use changes (densities, designations, etc.) or regulation changes (e.g., zoning) would occur to accommodate this growth. Additional affordable housing would not be provided in the unincorporated

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County. This alternative 1 plans for approximately half of the renewable energy projects approved or under review by the Energy Facility Siting Evaluation Council (EFSEC) for Benton County. Limited policy changes may be needed to maintain consistency with the GMA and the Countywide Planning Policies.

*Alternative 2, Aggressive Growth Target with Emphasis on Affordable Housing, Industry, and Energy:* This alternative would allow for changes in the Plan to accommodate the 20-year (2046) population growth projection for Benton County, based on Washington State Office of Financial Management (OFM) projections as refined in coordination with the cities. In this alternative, growth would occur based on past trends plus additional multi-family housing/more affordable housing in higher density designated areas and UGAs to meet housing requirements, and the designation of several additional industrial areas. This Alternative would plan for robust renewable energy growth and designate an Energy Overlay Zone. All of the renewable energy projects planned for Benton County through the EFSEC review and approval process would be planned for and included in this alternative, along with smaller-scale energy projects permitted outside the EFSEC process. This alternative will consider land use, policy, and regulatory changes to maintain consistency with the GMA and the Countywide Planning Policies, and to accommodate growth. Minimization and mitigation would be required, as applicable, for all project impacts to shrub-steppe and other critical areas on a project by project basis, and the County would not establish a shrub-steppe mitigation program.

*Alternative 3, Moderate Growth Target with More Limited Emphasis on Industry and Energy:* This alternative would allow for changes in the Plan to accommodate the 20-year (2046) population growth projection for Benton County, based on Washington State Office of Financial Management (OFM) projections as refined in coordination with the cities. This Alternative would capitalize on other development opportunities for smaller renewable energy projects and some additional Industrial designated lands (but less than in Alternative 2). Additional affordable housing would not be provided in the unincorporated County, including UGAs, under this alternative. Approximately half of the renewable energy projects planned for Benton County and approved or going through the Energy Facility Siting Evaluation Council (EFSEC) approval process, but not yet under construction would be included in this alternative. This alternative will include a shrub-steppe mitigation program

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to preserve this shrubsteppe habitat and other priority habitats and connection corridors in the County. It will also address other land use and policy changes to maintain consistency with the GMA and the Countywide Planning Policies and to accommodate growth.

*EIS Topics (unchanged from what was proposed):* Topics and potentially significant impacts that will be addressed related to these alternatives are anticipated to include Earth; Surface Water; Plants and Animals; Land Use; Environmental Health (Land and Air Quality); Shoreline Use; Population, Housing, and Employment; Parks and Recreation; Transportation; Public Services and Utilities; and Heritage Conservation (cultural and historic resources).

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**Attachment A**

**The Request for Comment on Scope of Programmatic Environmental Impact Statement (EIS)  
for the Periodic Update to the Benton County Comprehensive Plan**

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**Attachment B**

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

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