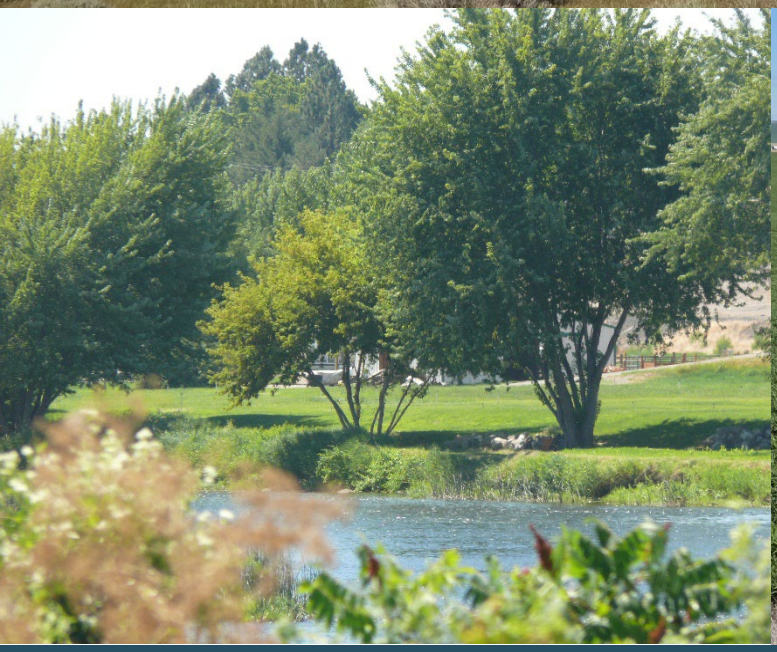






October, 23 2026

Benton County Draft Comprehensive Plan- Volume II

Updated by:
White Bluffs Consulting
1651 South Fescue Street
Kennewick WA 99338

BERK Consulting

AC Geo

Anchor QEA

J-U-B Engineers

October 23, 2026

Benton County Draft Comprehensive Plan Volume II

Updated by:
White Bluffs Consulting with
BERK Consulting, Inc.
AC Geo, LLC
Anchor QEA, Inc.
J-U-B Engineers Inc.

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Appendix L Benton County Shrubsteppe and Wetland Prioritization Memorandum

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Introduction to Volume II

Volume II provides technical appendices that support the Benton County Comprehensive Plan (Plan). It includes the background data, methods, and documentation used to develop updated goals and policies and Plan elements in Volume I and to meet Growth Management Act (GMA) requirements.

The Map Folio contains the Land Use Map and other supporting maps. These maps summarize existing conditions, constraints, and planned land use using GIS-based analysis.

The technical appendices in Volume II document key analyses for land use, housing, natural resources, infrastructure, and environmental conditions. They show how the County reached its conclusions and provide a record to support future updates and monitoring.

The Climate Element is supported by regional data, tools, and coordination led by the Benton-Franklin Council of Governments. Additional information, datasets, and technical appendices for the Climate Element can be found through Benton-Franklin Council of Governments at: https://www.bfcog.us/180/Climate-Change.

Appendix A
Map Folio

Legend

- County Boundary
- City Limits
- UGAs
- Federal Refuge
- Waterbodies
- Streams
- Canals
- US/State Highway
- Major County Road
- Railroad

0 — 10 Miles



BENTON COUNTY WASHINGTON

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Grant County
Columbia River
Cold Creek
24
Dry Creek
Rattlesnake Creek
240
US Department of Energy Hanford Site
Fitzner/Eberhardt Arid Lands Ecology Reserve
RATTLESNAKE HILLS
Spring Creek
Yakima River
West Richland
Richland
Yakima County
SAGEBRUSH RIDGE
CROSBY RD
Snipes Creek
Corral Creek
225
THE BADLANDS
HANKS RD
224
Chaffee
Benton City
OLD INLAND EMPIRE HWY
Whitstran
Gibbon
182
82
HORSE HEAVEN HILLS
Prosser
22
Franklin County
Snake River
Pasco
Burbank
Walla Walla County
395
Kennewick
Finley
SELLARDS RD
221
BERT JAMES RD
397
HORSE HEAVEN HILLS
HORRIGAN RD
PLYMOUTH RD
MEALS RD
Glade Creek
East Branch Glade Creek
FOURMILE CANYON
PATERSON RIDGE
14
Paterson
Plymouth
Umatilla National Wildlife Refuge
Columbia River
Umatilla
OREGON
Klickitat County
CANOE RIDGE
GROW BUTTE
Boardman
Morrow County
Hermiston
Umatilla County

Data Sources: USDA SSURGO, FEMA, Benton County GIS, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), National Ocean

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Figure 1

General Overview Map

Benton County Comprehensive Plan

Legend

Public Ownership

- County or City Government
- State Government (Non-DNR) Ownership
- Federal Government Ownership
- DNR Managed Lands
- DNR presumed leased lands
- Parks, Rec. Areas, Scenic Overlooks
- City Limits
- UGAs
- Federal Refuge

0 — 10 Miles

N

BENTON COUNTY WASHINGTON

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Grant County
Columbia River
US Department of Energy Hanford Site
Fitzner/Eberhardt Arid Lands Ecology Reserve
Cold Creek
Dry Creek
Rattlesnake Creek
RATTLESNAKE HILLS
Spring Creek
Thornton Wildlife Area
Rattlesnake Slope Wildlife Area
Yakima River
West Richland
McNary National Wildlife Refuge Richland
Franklin County
Yakima County
Snipes Creek
Corral Creek
CROSBY RD
HANKS RD
OLD INLAND EMPIRE HWY
Benton City
Candy Mountain Preserve
Whitstran
HORSE HEAVEN HILLS
Badger Mountain Centennial Preserve
Prosser
Horse Heaven Hills Vista
Kennewick
Walla Walla County
Finley
Horse Heaven Cemetery County Park
SELLARDS RD
BERT JAMES RD
Hover Park
HORRIGAN RD
Glade Creek
East Branch Glade Creek
PLYMOUTH RD
MEALS RD
Wallula Gap Preserve
FOURMILE CANYON
PATERSON RIDGE
Paterson
Plymouth
Umatilla National Wildlife Refuge
Columbia River
OREGON
Klickitat County
CANOE RIDGE
Umatilla County
Morrow County

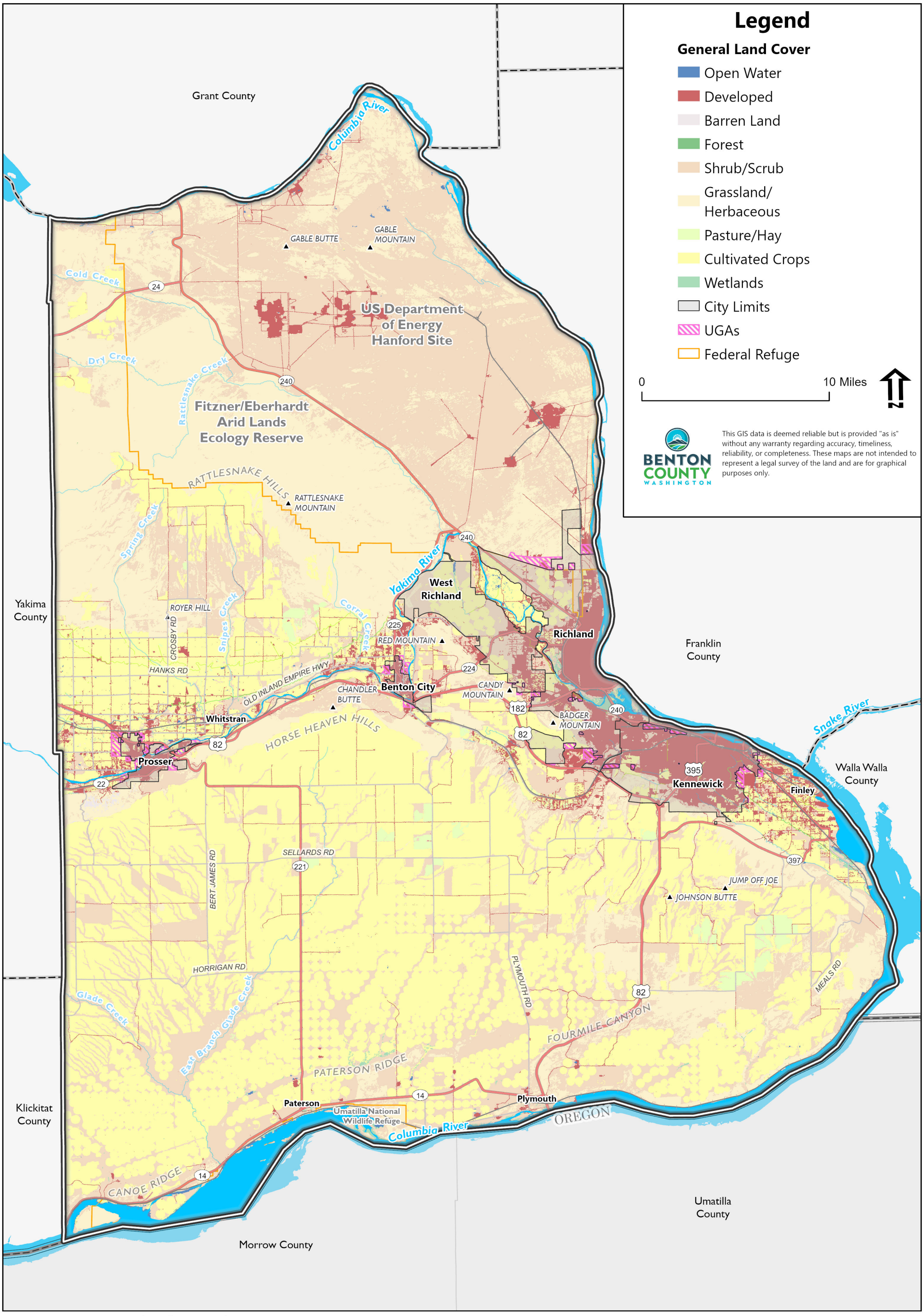
Data Sources: USDA SSURGO, FEMA, Benton County GIS, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), National Ocean

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Figure 2

Public Land and Parks Map

Benton County Comprehensive Plan



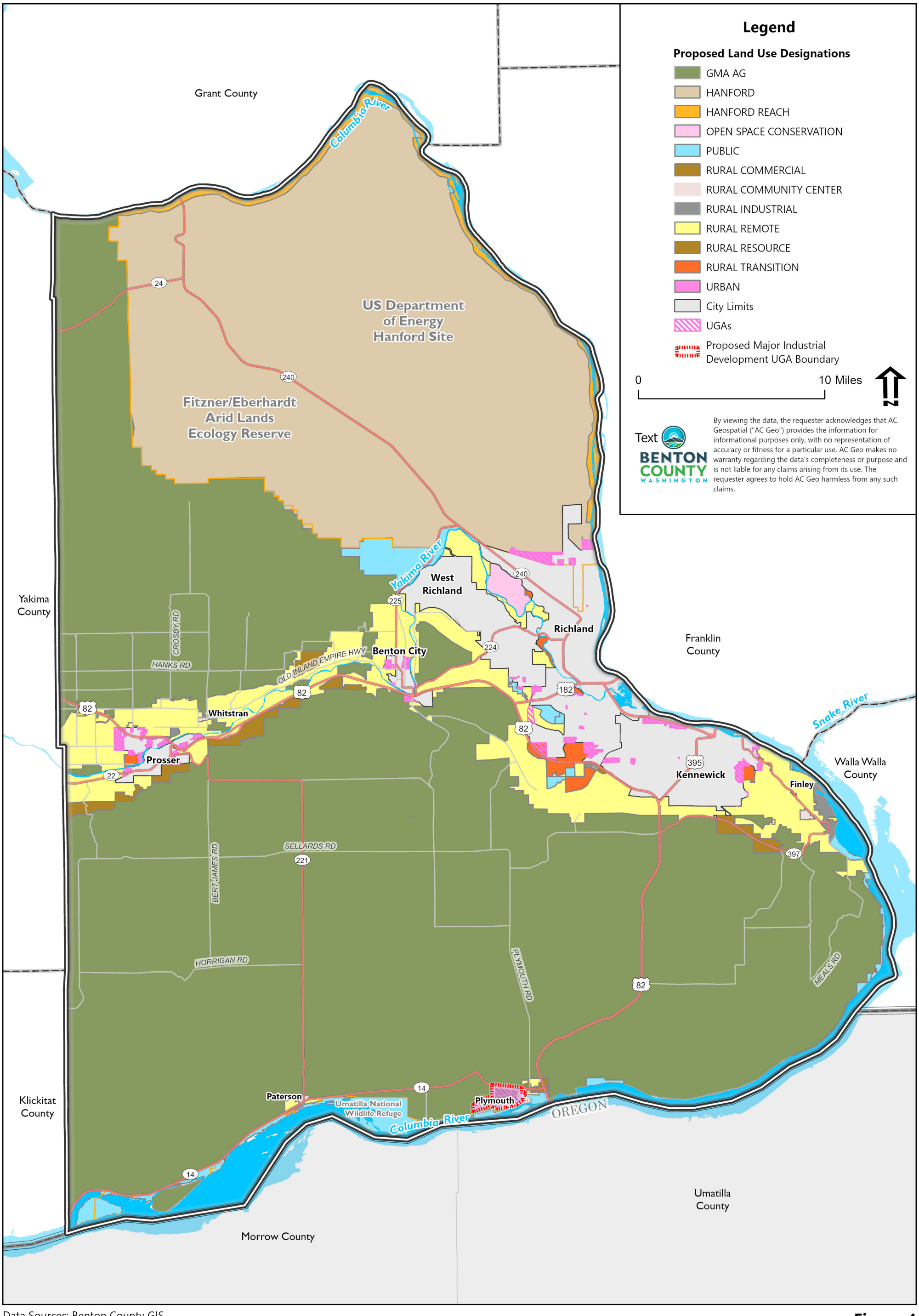
Data Sources: MRLC National Landcover Database, FEMA, Benton County GIS, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), National Ocean Service (NOS),

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Figure 3

General Land Cover Map

Benton County Comprehensive Plan



Data Sources: Benton County GIS, Washington Department of Transportation, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau;

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Figure 4

Proposed Land Use Designations Map

Benton County Comprehensive Plan

Grant County
Columbia River
US Department of Energy Hanford Site
Fitzner/Eberhardt Arid Lands Ecology Reserve
Yakima River
West Richland
Richland
Franklin County
Yakima County
Benton City
Whitstran
Prosser
Kennewick
Finley
Snake River
Walla Walla County
Klickitat County
Paterson
Umatilla National Wildlife Refuge
Columbia River
OREGON
Plymouth
Umatilla County
Morrow County
CROSBY RD
HANKS RD
OLD INLAND EMPIRE HWY
BERT JAMES RD
SELLARDS RD
HORRIGAN RD
PLYMOUTH RD
MEALS RD
24
240
225
224
182
82
22
221
395
397
14

Legend

Zoning Designations

- COMMUNITY CENTER RESIDENTIAL
- COMMUNITY COMMERCIAL
- GENERAL COMMERCIAL
- GMA AG
- HEAVY INDUSTRIAL
- INTERCHANGE COMMERCIAL
- LIGHT INDUSTRIAL
- PARK DISTRICT
- RED MOUNTAIN AG
- RL-1
- RL-20
- RL-5
- UGAR
- UNCLASSIFIED
- City Limits
- UGAs
- Major Industrial Development UGA

0 — 10 Miles

N

BENTON COUNTY WASHINGTON

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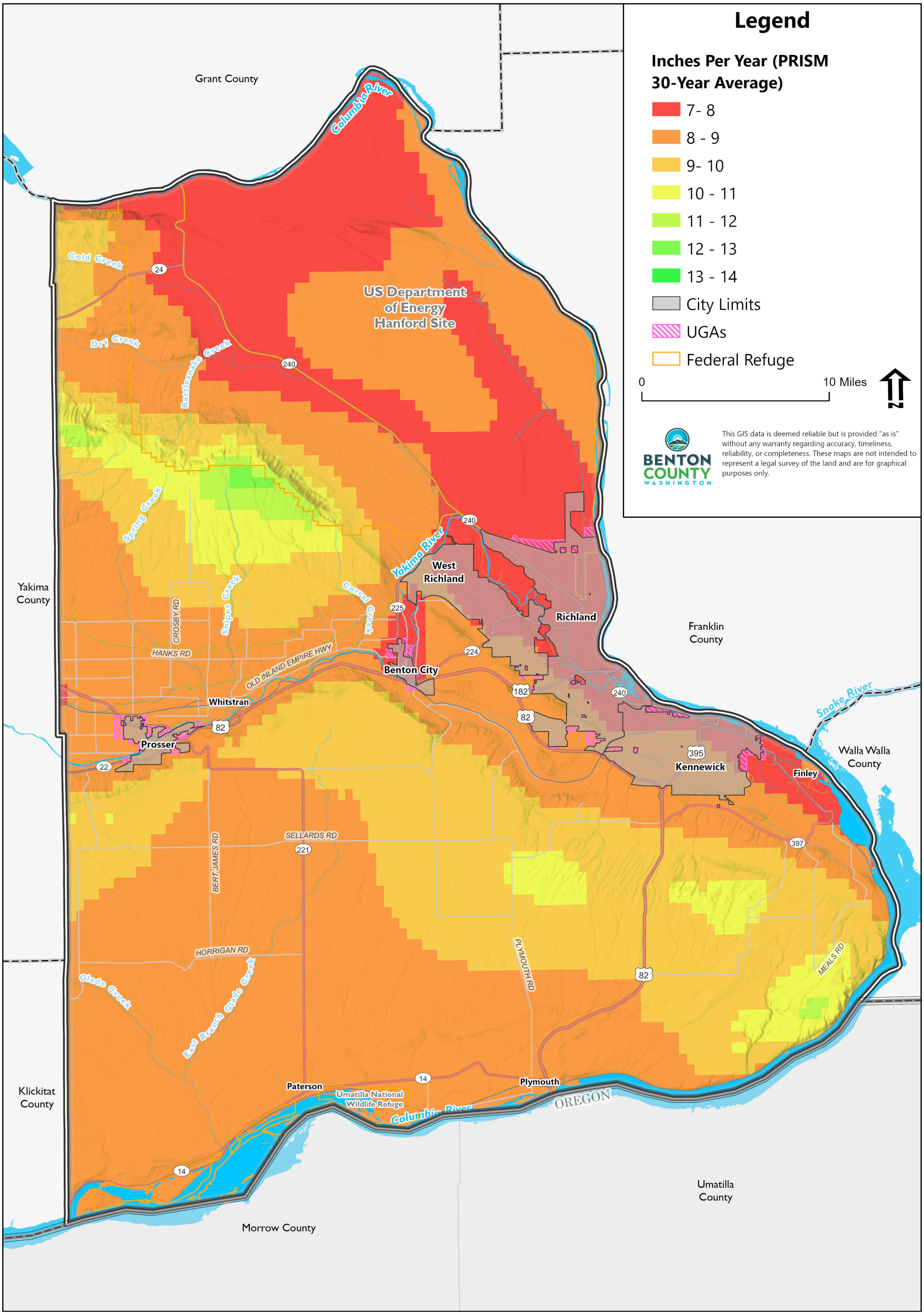
Data Sources: Benton County GIS, Washington Department of Transportation, Washington DNR

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Figure 5

Proposed Zoning Map

Benton County Comprehensive Plan



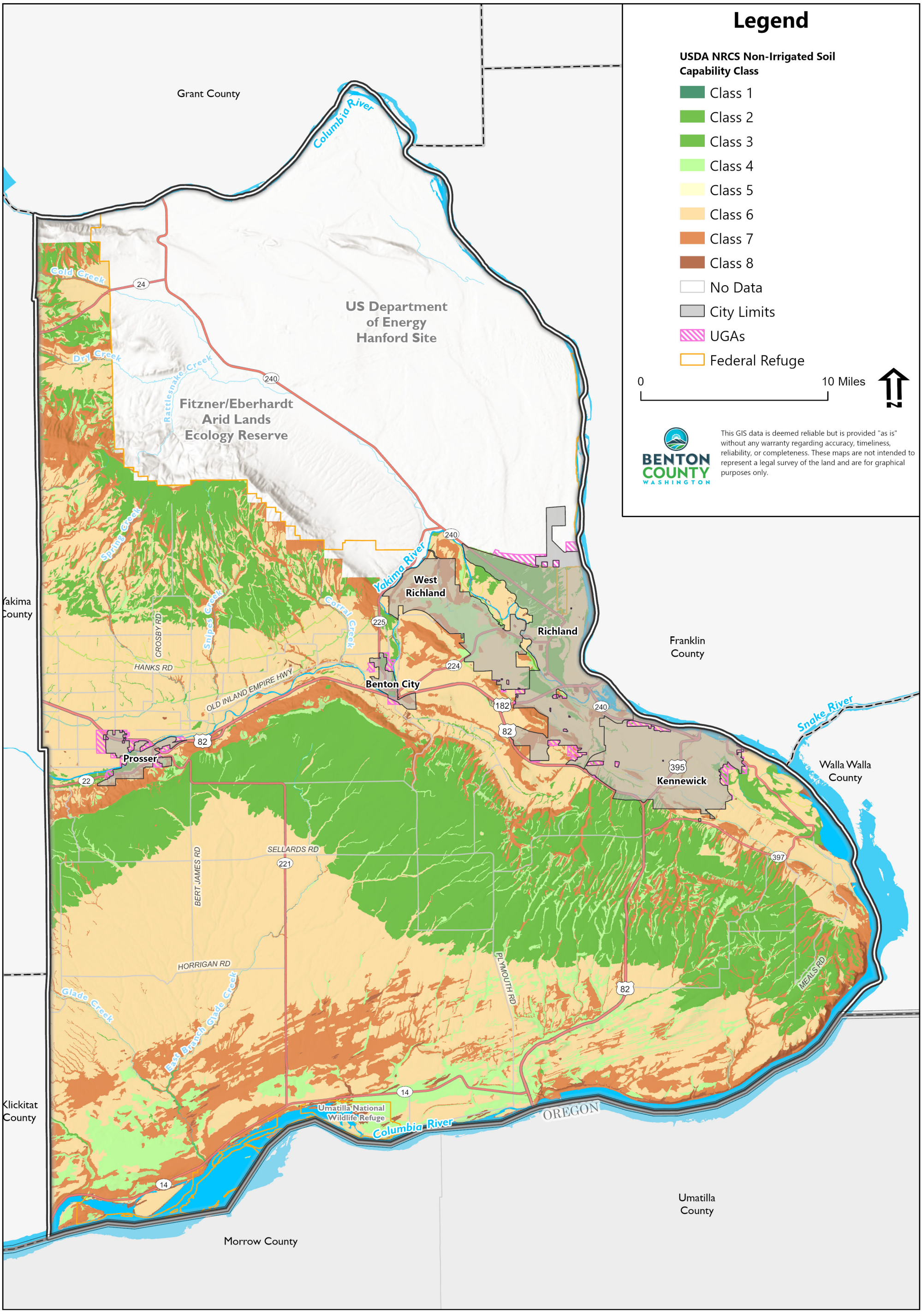
Data Sources: USDA SSURGO, FEMA, Benton County GIS, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), National Ocean

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Figure 6

Average Annual Precipitation Map

Benton County Comprehensive Plan



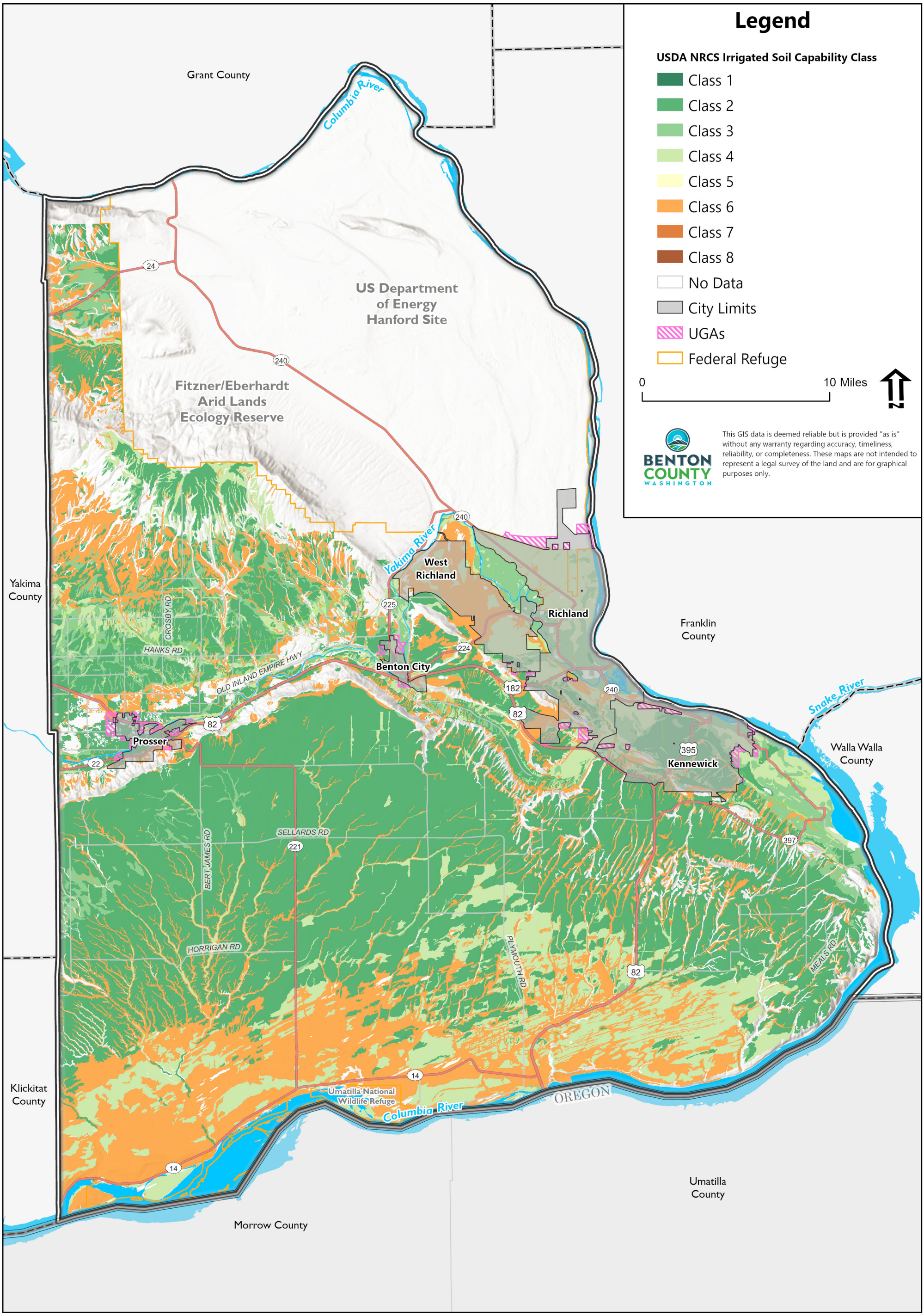
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Figure 7

Non-Irrigated Soil Capability Classification Map

Benton County Comprehensive Plan



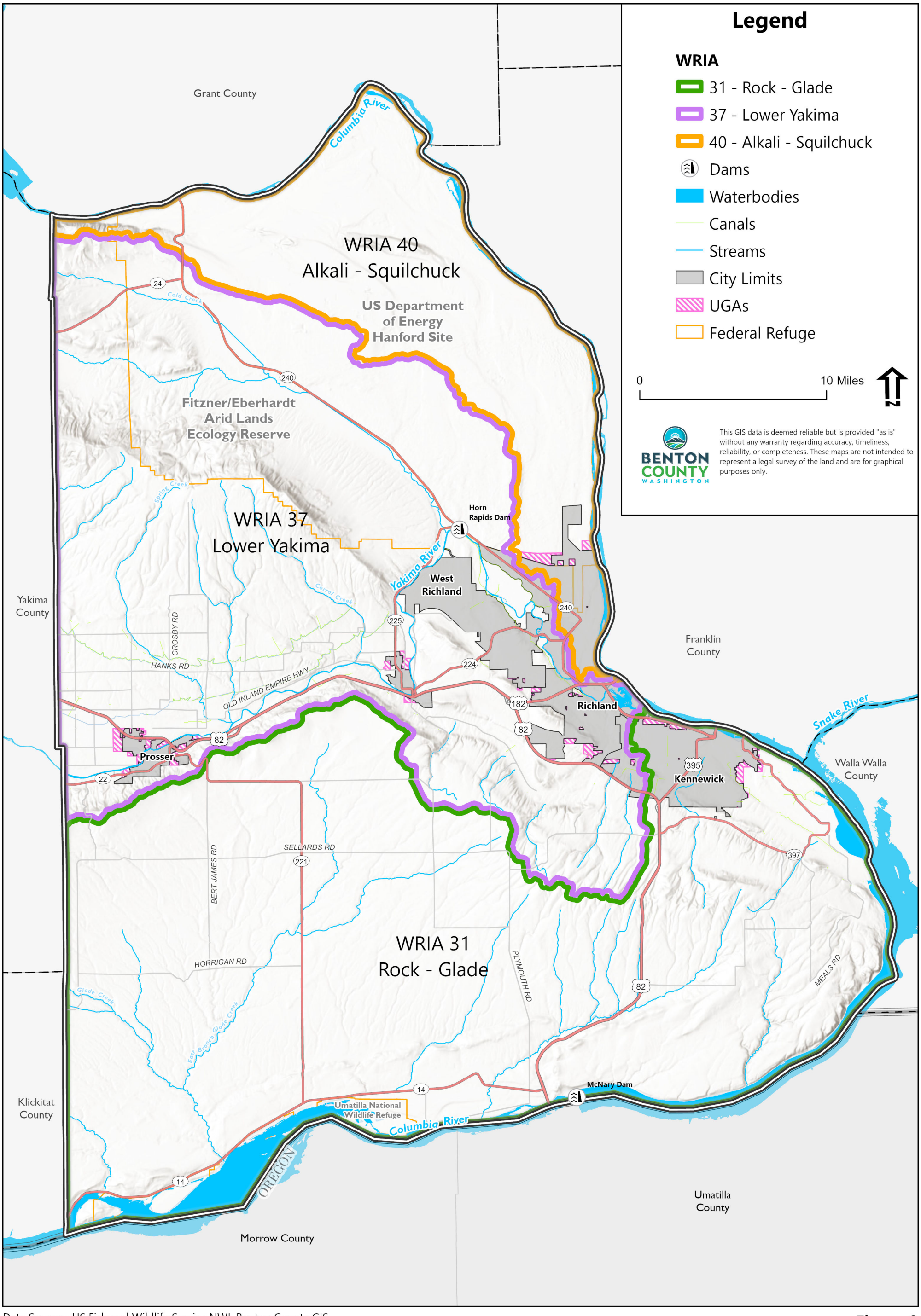
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Figure 8

Irrigated Soil Capability Classification Map

Benton County Comprehensive Plan



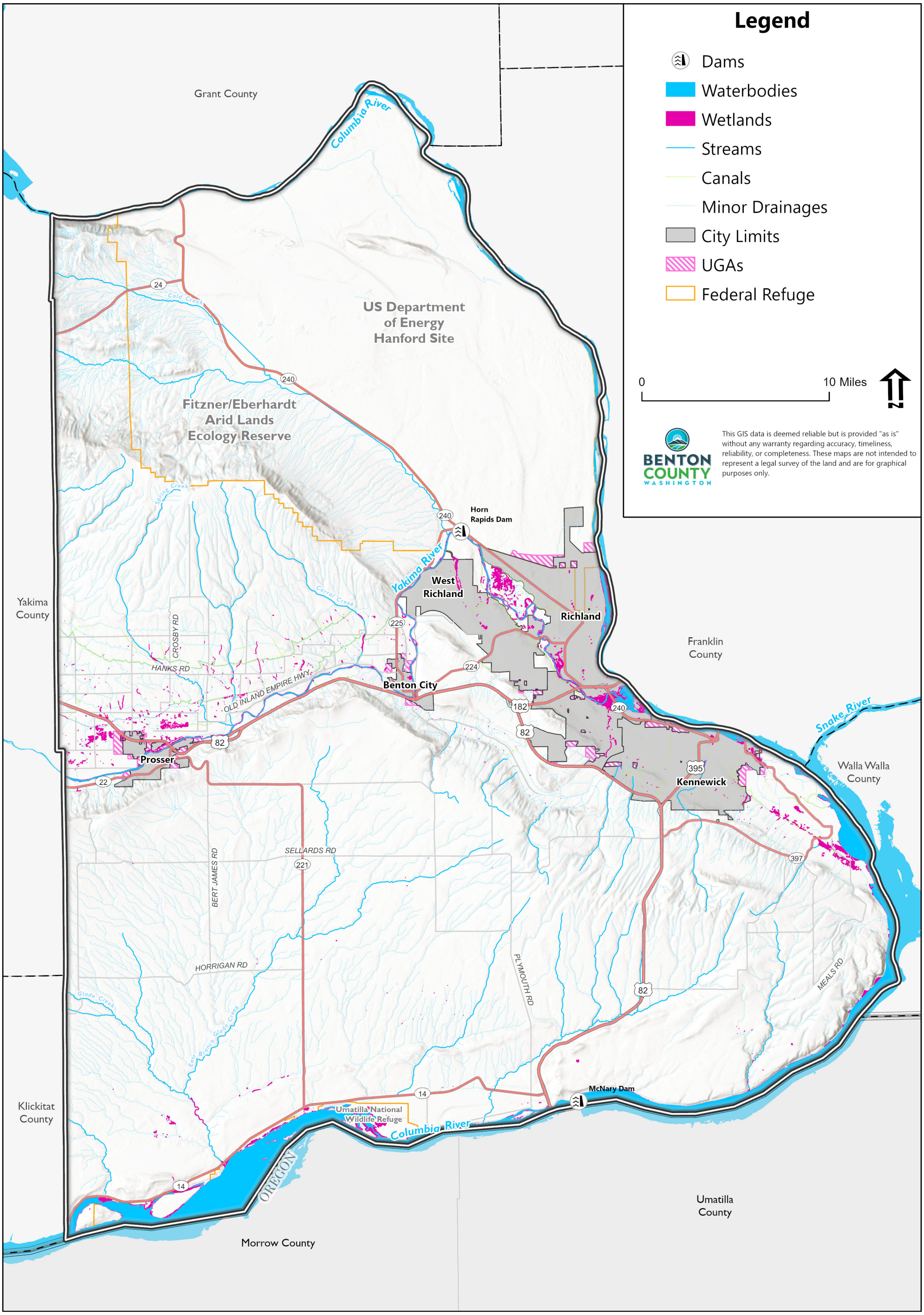
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Figure 9

Water Resources Map

Benton County Comprehensive Plan



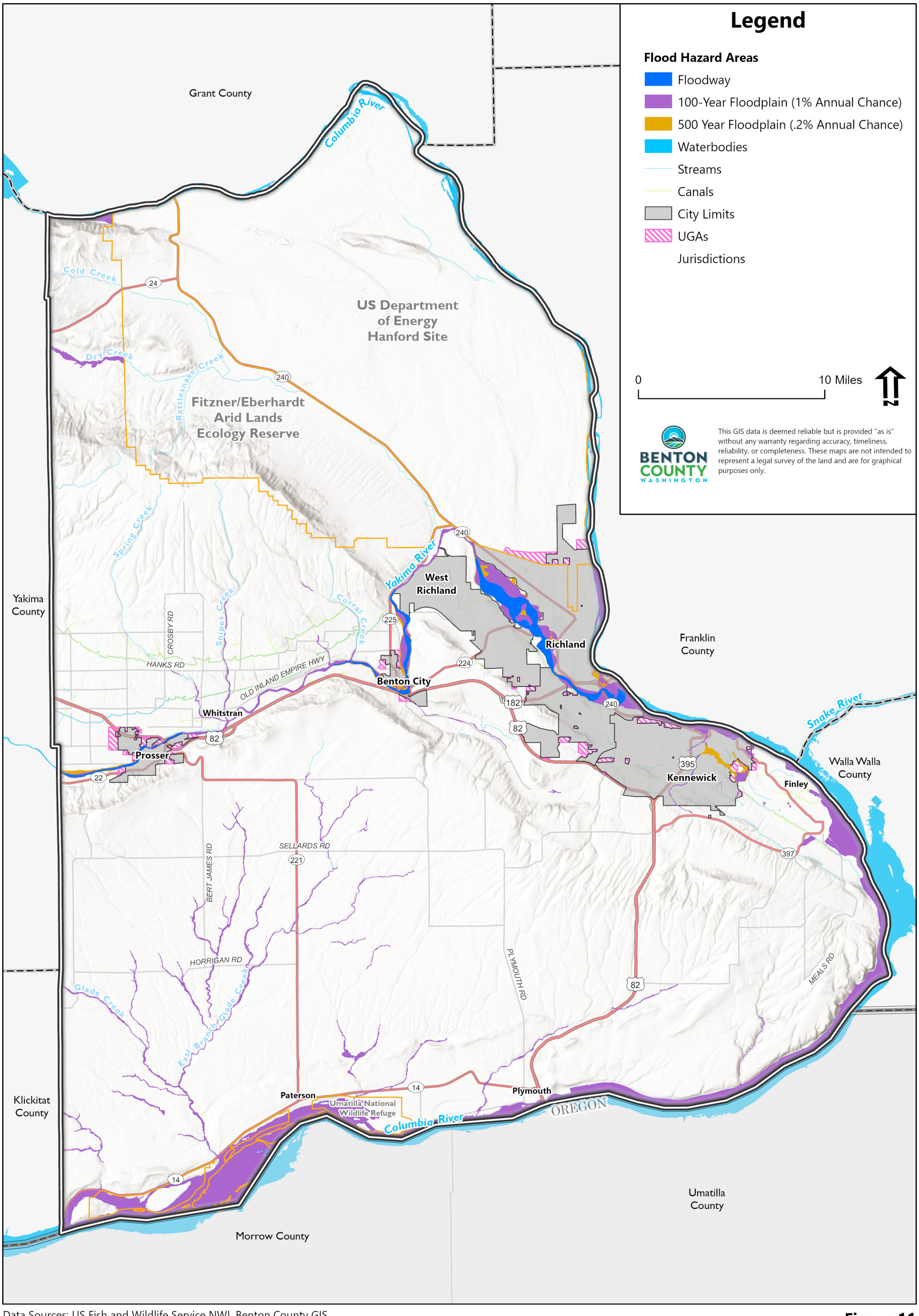
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Figure 10

Streams, Waterbodies & Wetlands Map

Benton County Comprehensive Plan



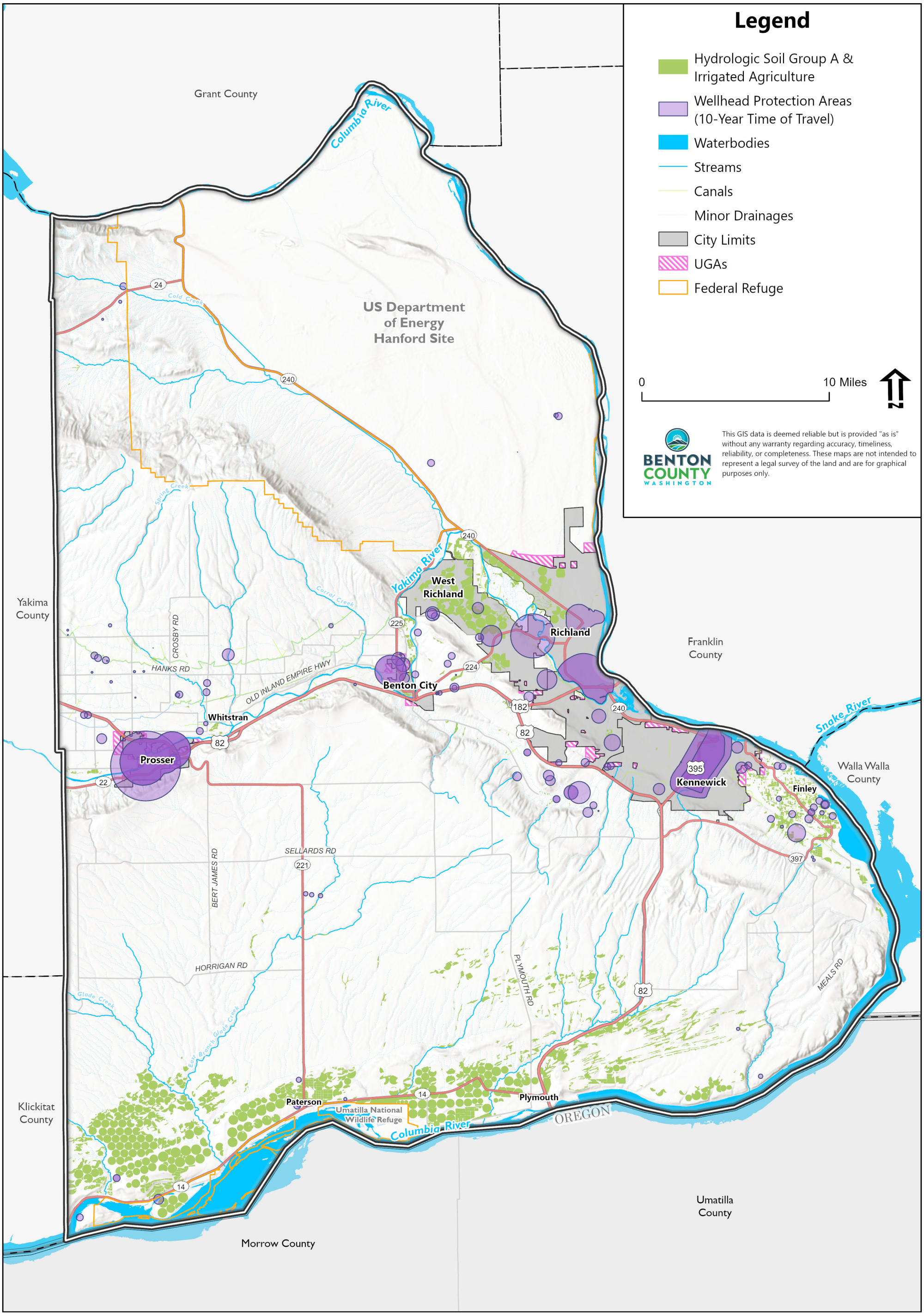
Data Sources: US Fish and Wildlife Service NWI, Benton County GIS, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), National Ocean

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Figure 11

Floodplains Map

Benton County Comprehensive Plan



Data Sources: US Fish and Wildlife Service NWI, Benton County GIS, Washington DNR, Washington Department of Health, USDA NRCS SSURGO Soils,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and

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Figure 12

Critical Aquifer Recharge Areas Map

Benton County Comprehensive Plan



Data Sources: US Fish and Wildlife Service NWI, Benton County GIS, Washington DNR, Washington Department of Health, USDA NRCS SSURGO Soils,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and

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Figure 13

Geologic Hazard Areas Map

Benton County Comprehensive Plan

Legend

Biodiversity Areas & Corridors

- Habitat Core Areas
- Habitat Corridors

PHS Species (State Status)

- Ferruginous Hawk (Endangered)
- Sage Grouse (Threatened)
- American White Pelican (Sensitive)
- Loggerhead Shrike (Candidate)
- Sagebrush Sparrow (Candidate)
- Burrowing Owl (Candidate)
- Shrubsteppe,
- Inland Sand Dunes,
- Cliffs/bluffs,
- Talus Slopes,
- Other PHS Habitats

Jurisdictions

0 — 10 Miles

N

BENTON COUNTY WASHINGTON

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Grant County
Columbia River
US Department of Energy Hanford Site
Fitzner/Eberhardt Arid Lands Ecology Reserve
Yakima River
West Richland
Richland
Franklin County
Yakima County
Benton City
Whitstran
Prosser
Kennewick
Finley
Snake River
Walla Walla County
Paterson
Umatilla National Wildlife Refuge
Plymouth
OREGON
Klickitat County
Morrow County
Umatilla County
CROSBY RD
HANKS RD
OLD INLAND EMPIRE HWY
SELLARDS RD
BERT JAMES RD
HORRIGAN RD
PLYMOUTH RD
MEALS RD
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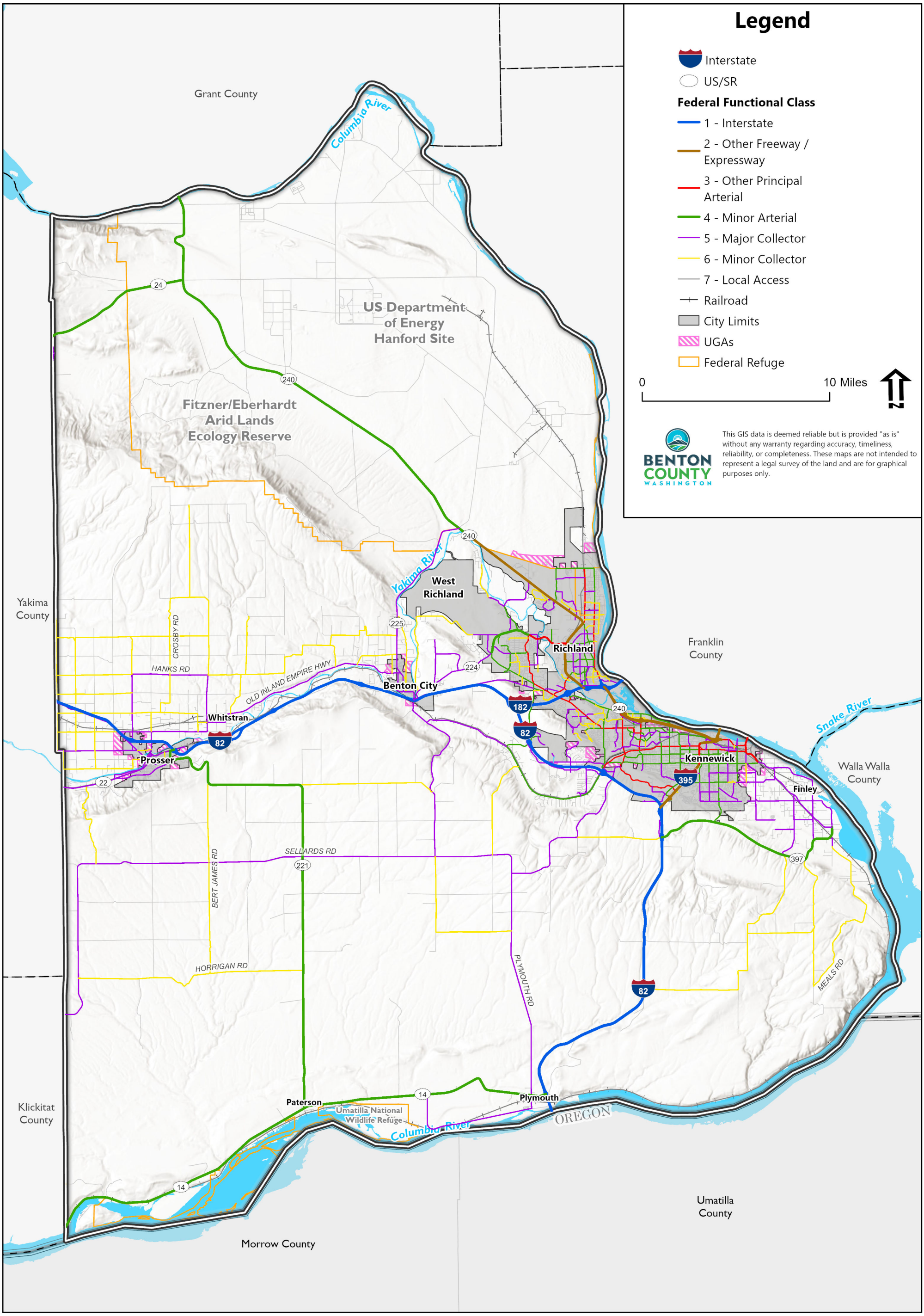
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Figure 14

Fish & Wildlife Habitat Conservation Areas Map

Benton County Comprehensive Plan



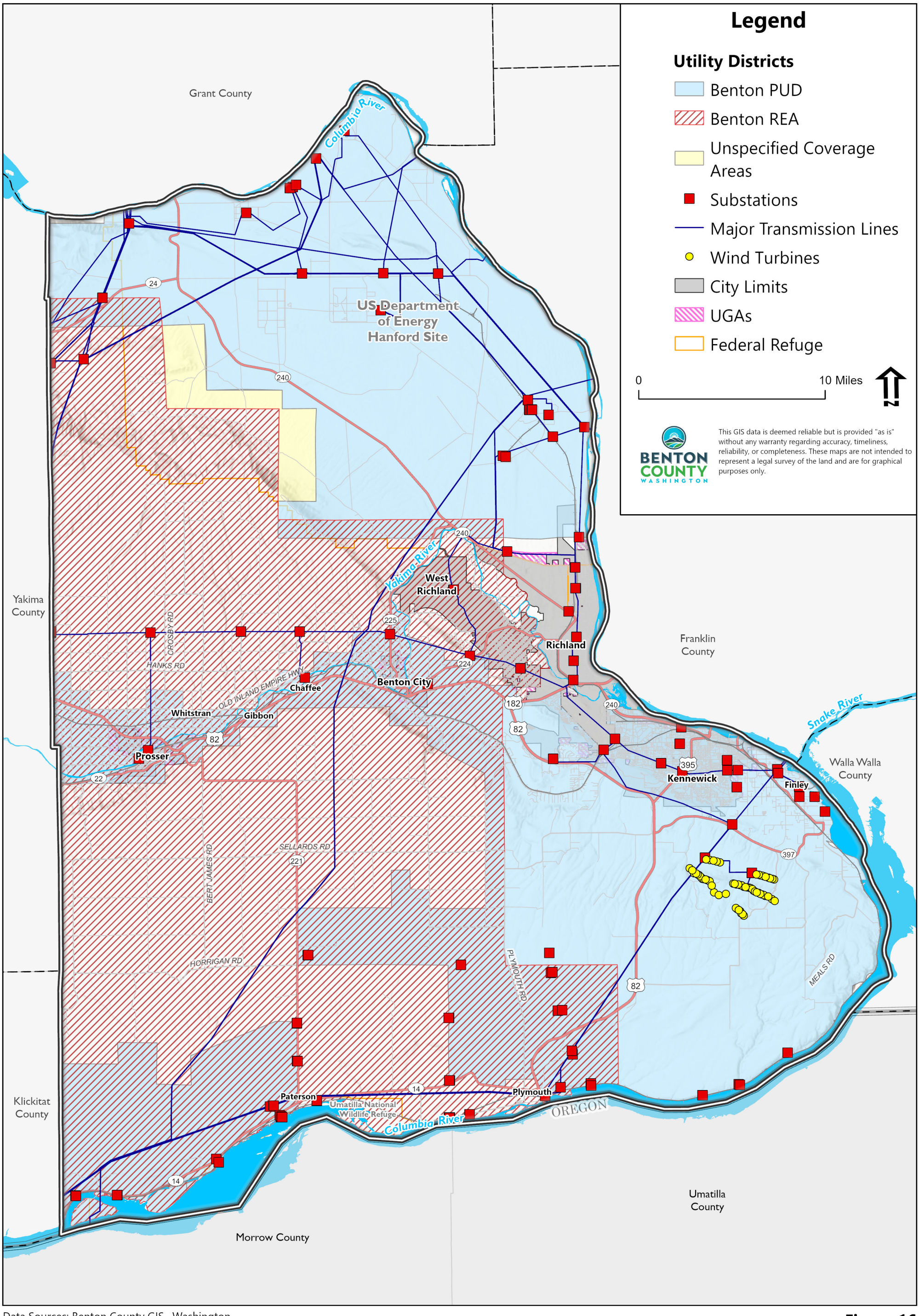
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Figure 15

Existing Transportation Facilities Map

Benton County Comprehensive Plan



Data Sources: Benton County GIS, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric Administration

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Figure 16

Utilities Map

Benton County Comprehensive Plan



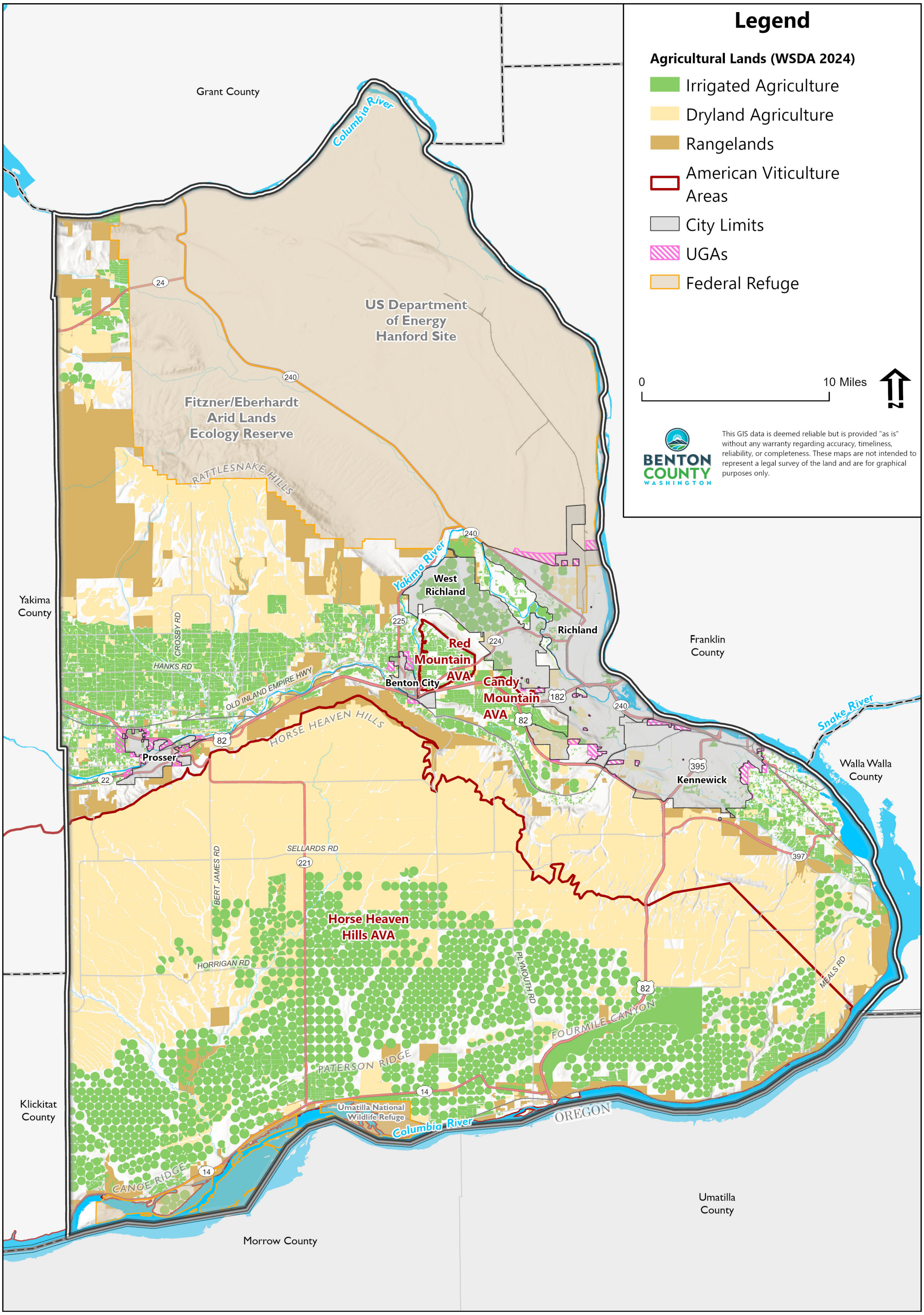
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Figure 17

Geology & Mineral Resources Map

Benton County Comprehensive Plan



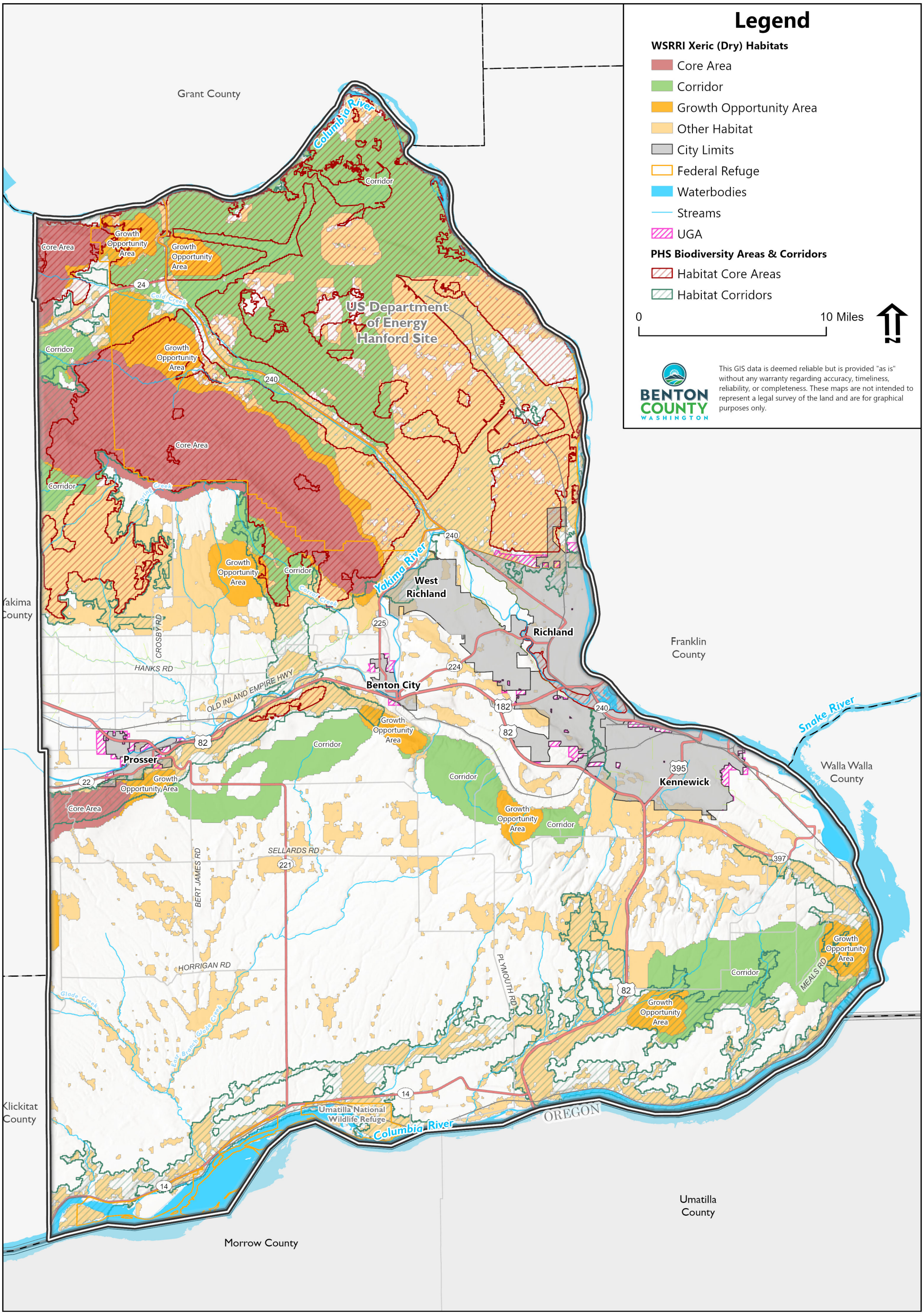
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Figure 18

Agricultural Land Use Map

Benton County Comprehensive Plan



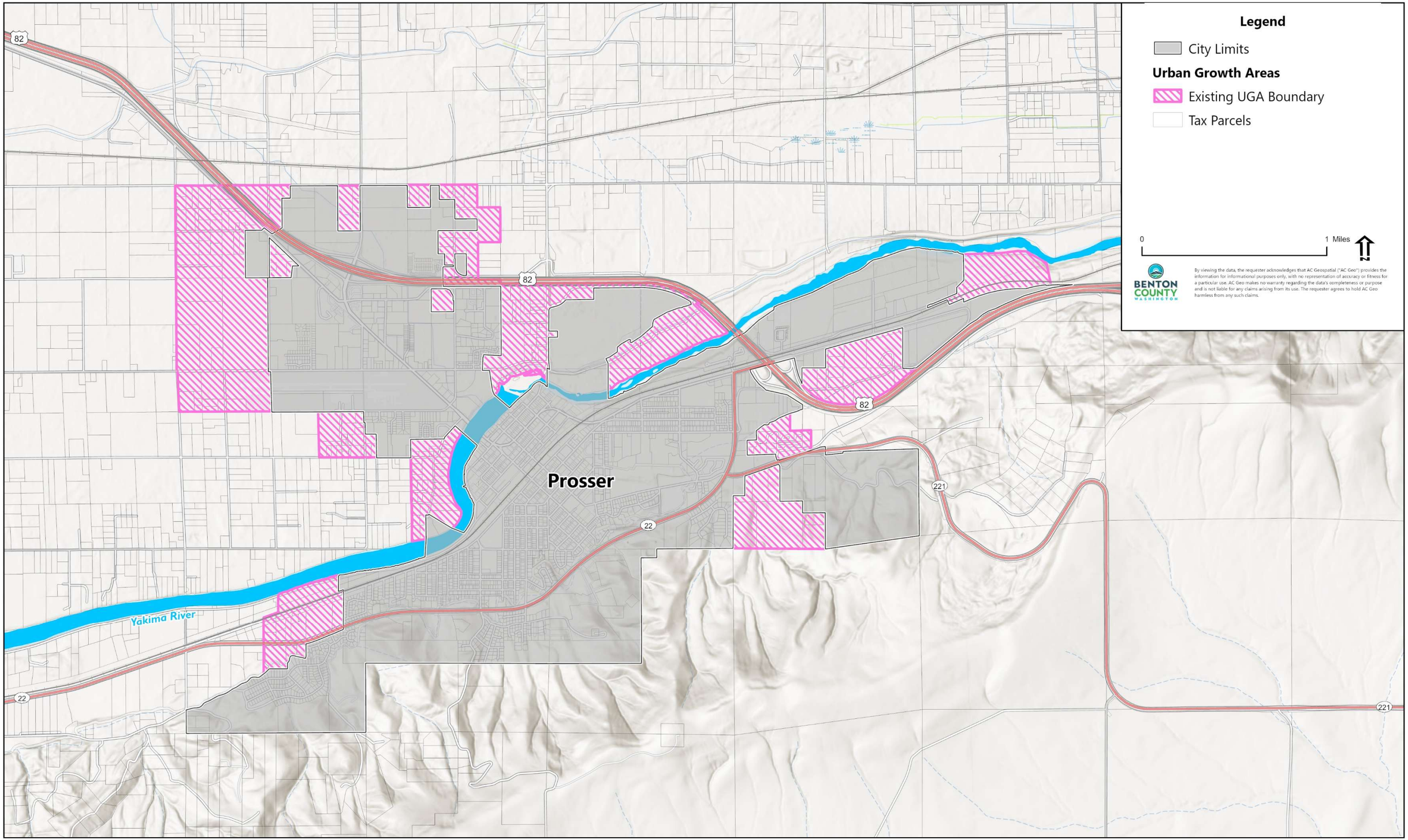
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Figure 19

Washington Shrubsteppe Restoration & Resiliency Map

Benton County Comprehensive Plan



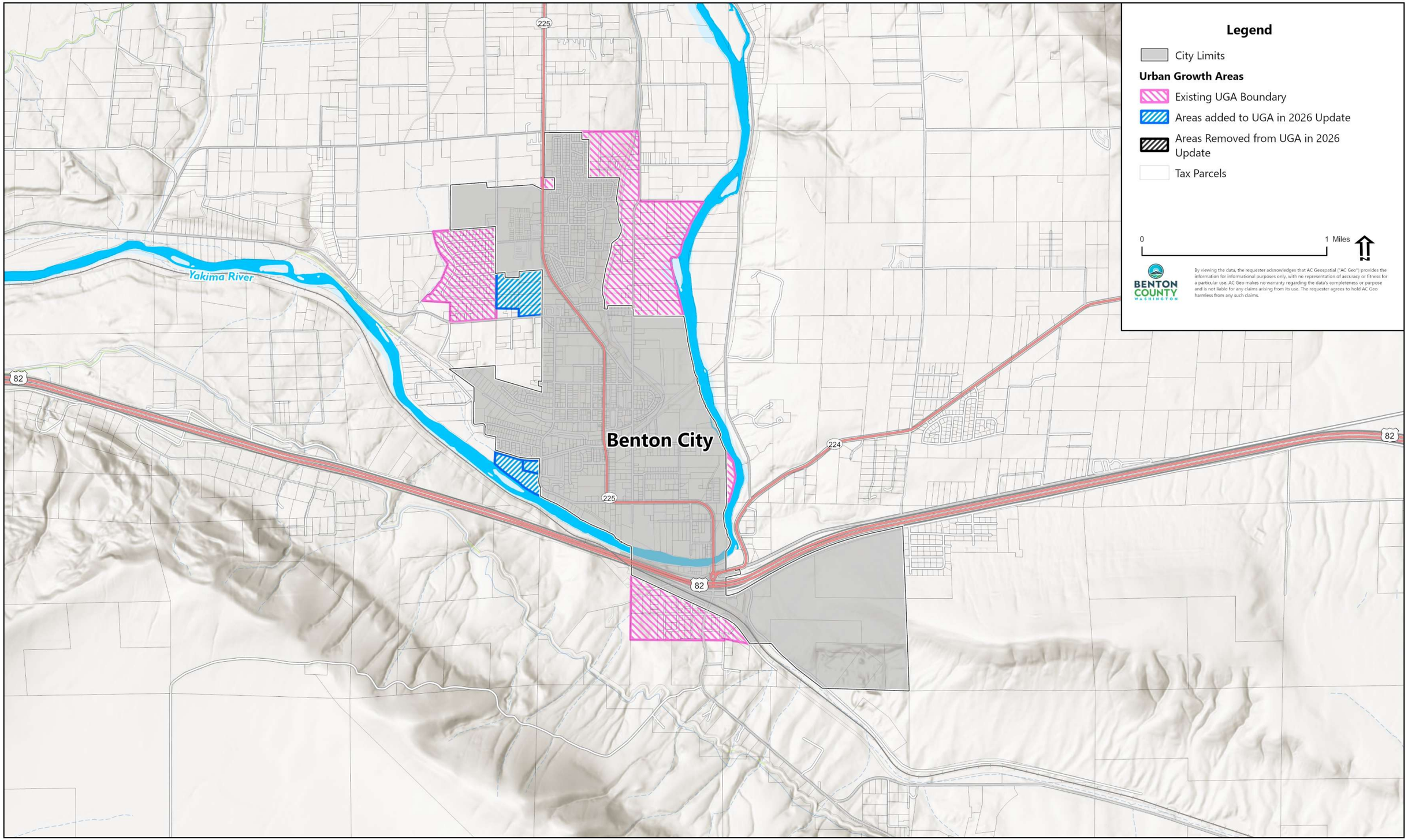
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Figure 20

Prosser UGA Map

Benton County Comprehensive Plan



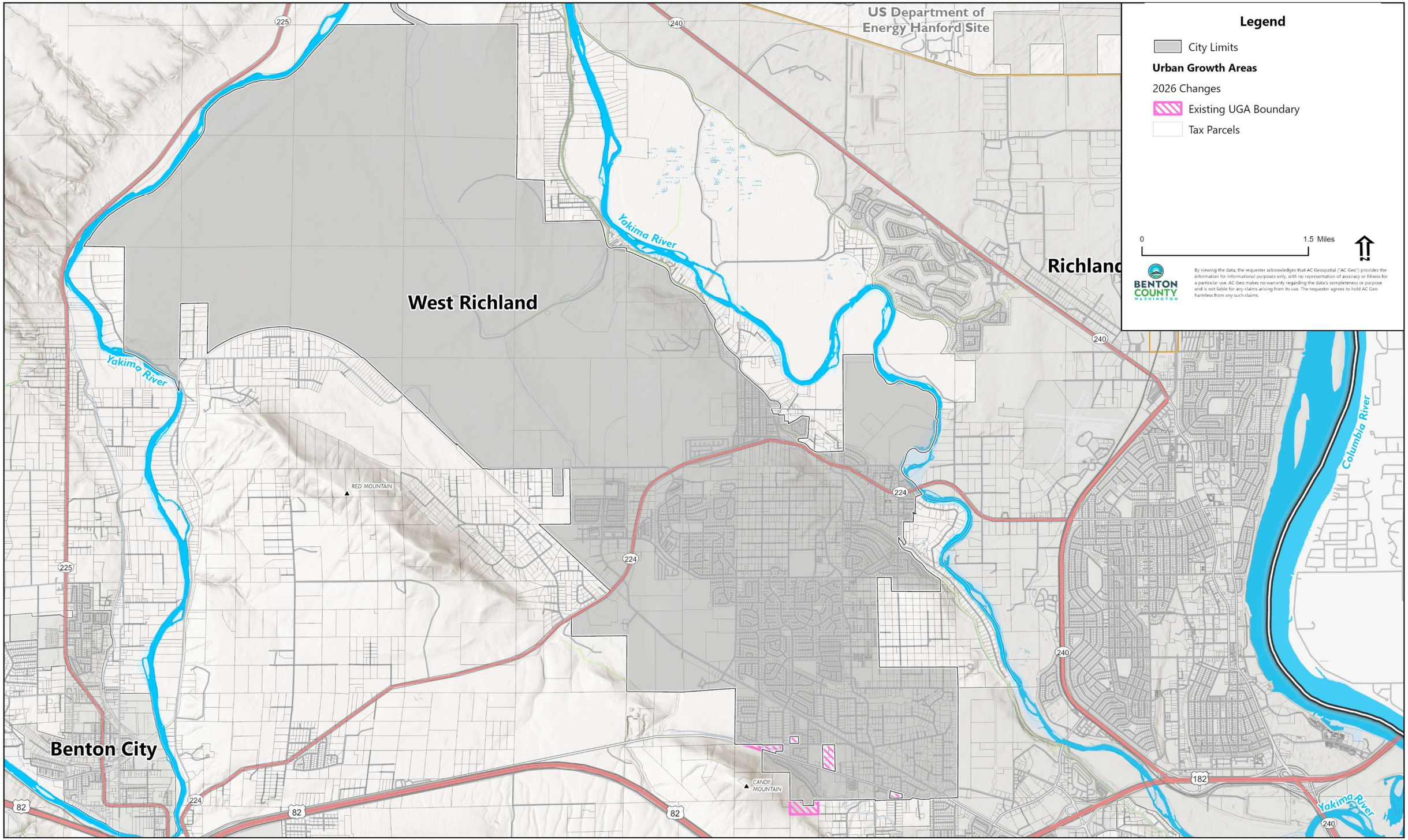
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Figure 21

Benton City UGA Map

Benton County Comprehensive Plan



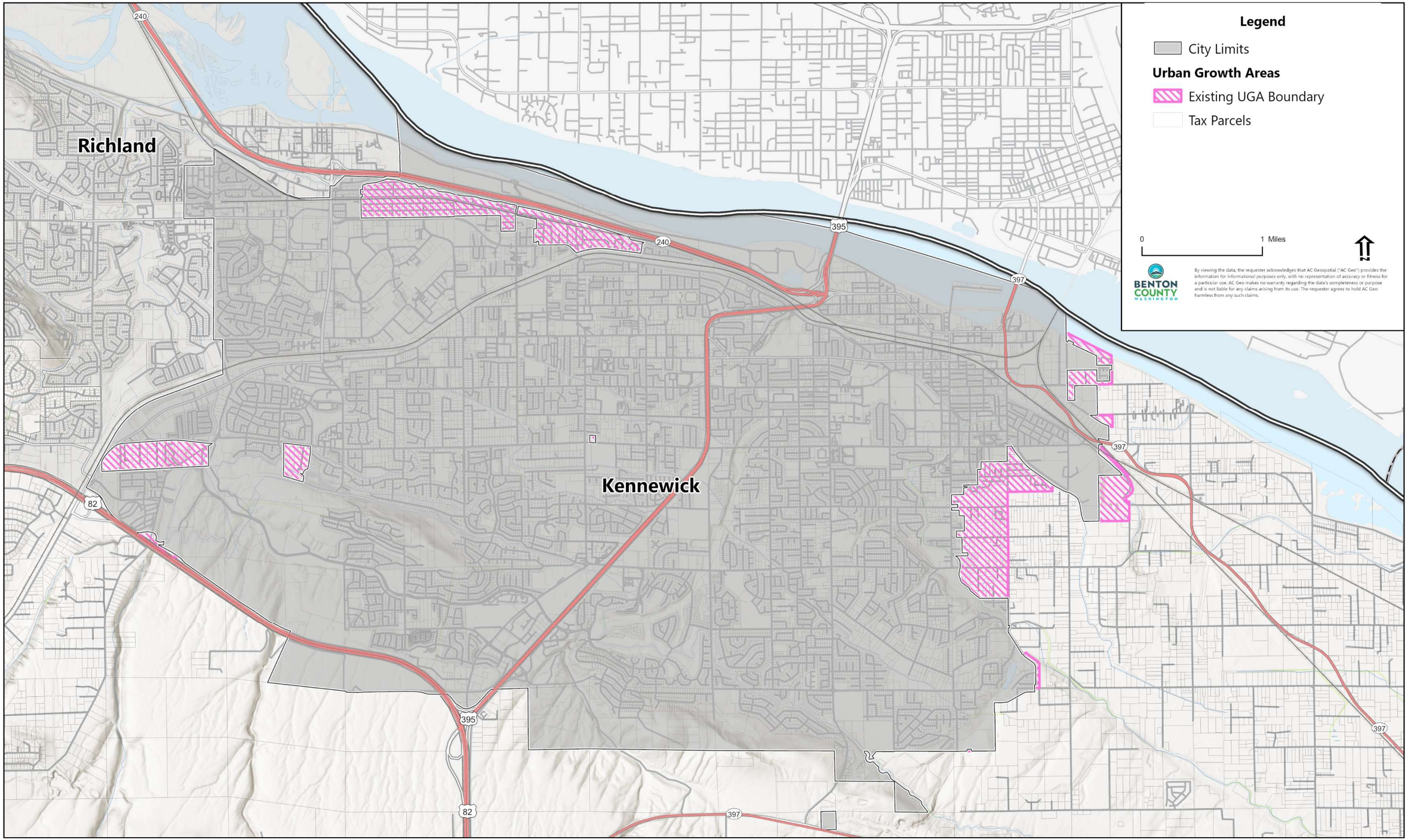
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Figure 22

West Richland UGA Map

Benton County Comprehensive Plan



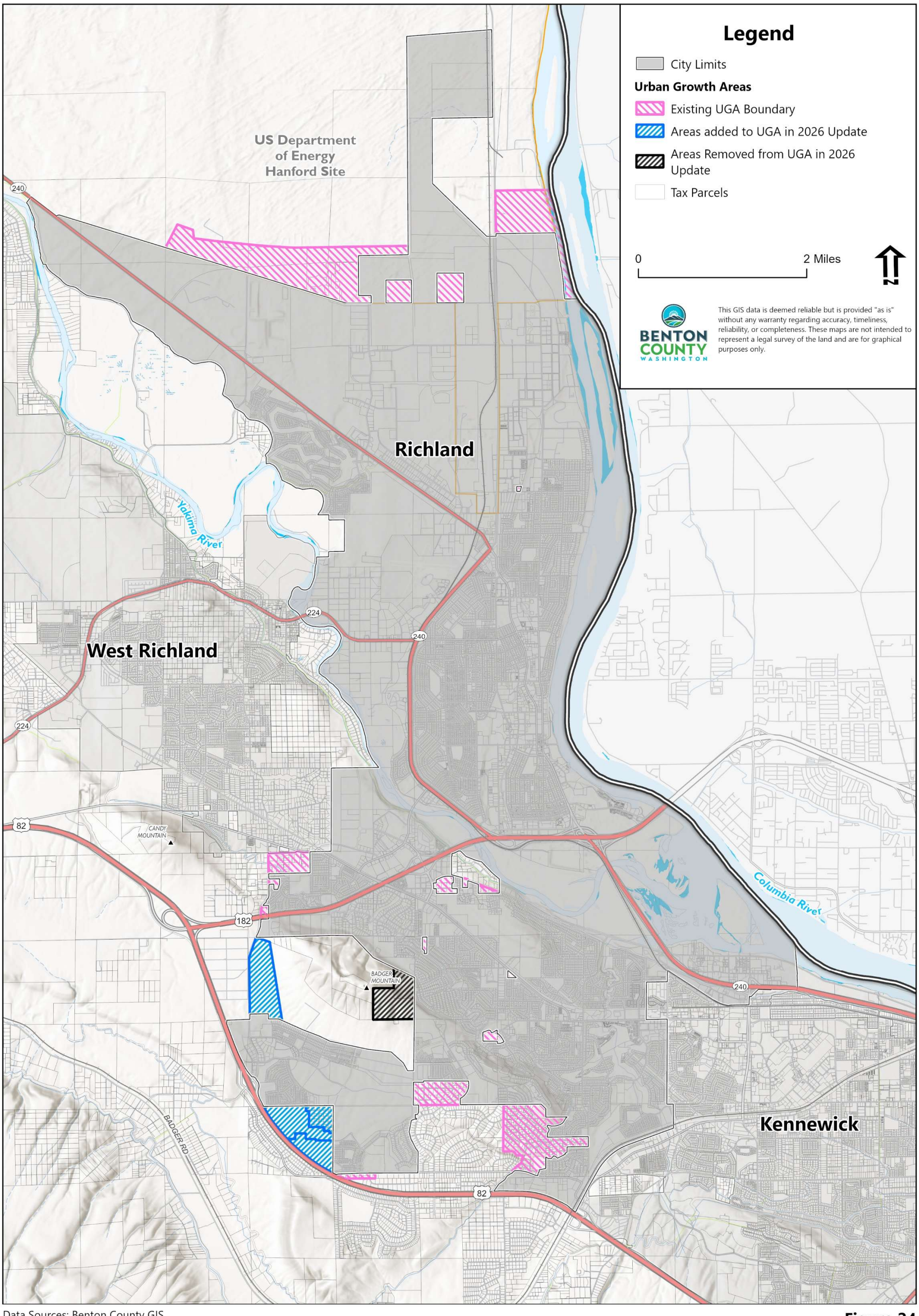
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Figure 23

Kennewick UGA Map

Benton County Comprehensive Plan



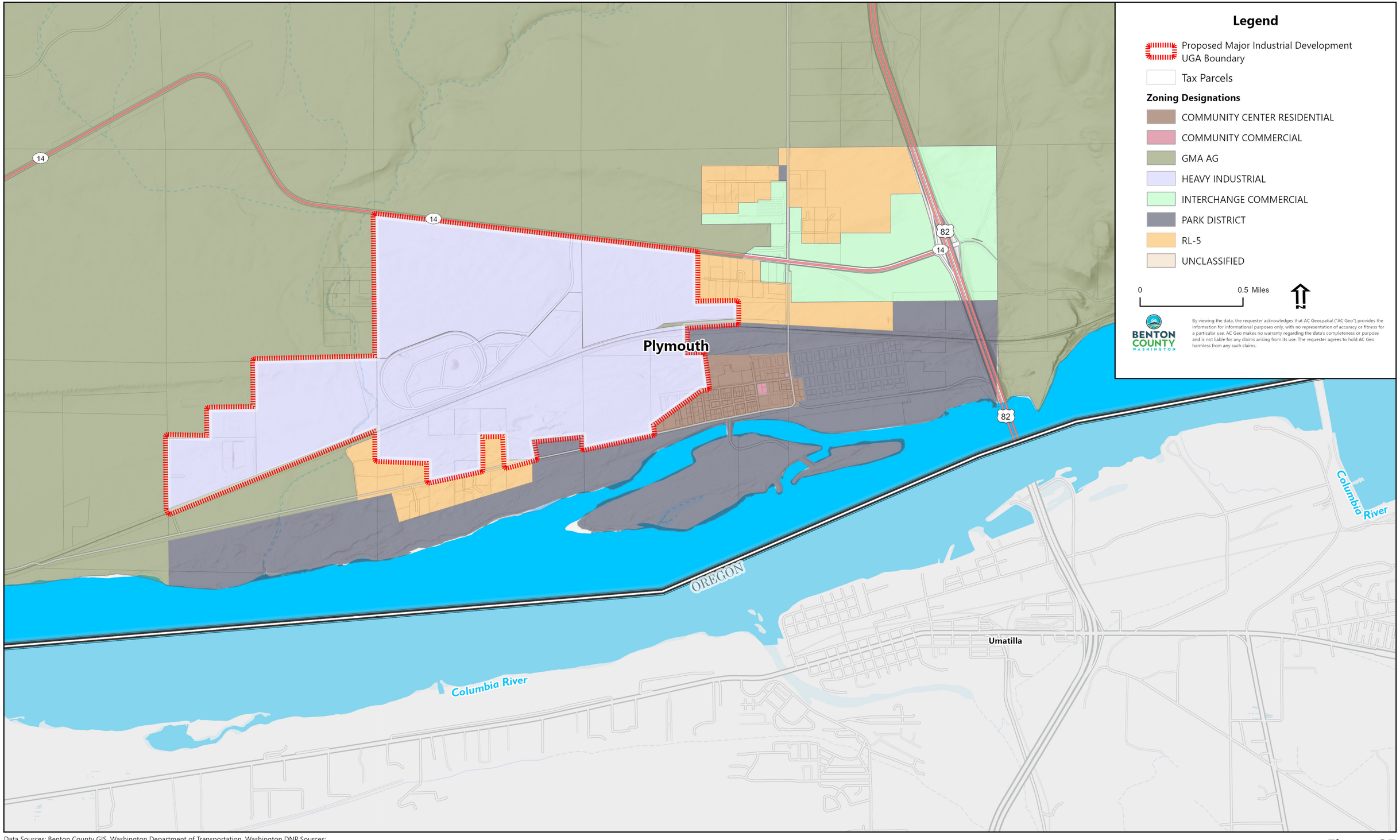
Data Sources: Benton County GIS, Washington Department of Transportation, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau;

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Figure 24

Richland UGA Map

Benton County Comprehensive Plan



Data Sources: Benton County GIS, Washington Department of Transportation, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), National Ocean Service (NOS), National Geodetic Survey (NGS) , WSDOT, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap

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Figure 25

Plymouth Major Industrial Development UGA Map

Benton County Comprehensive Plan

Appendix B
Public Participation Plan



February 2025
Benton County Comprehensive Plan Update

WHITE BLUFFS CONSULTING

Public Participation Plan – Comprehensive Plan Update

Prepared for Benton County

Funded by a grant from Washington State Department of Commerce

FINAL

February 2025
Benton County Comprehensive Plan Update

Public Participation Plan

Prepared for
Benton County
102206 E. Wiser Parkway
Kennewick, WA 99338

Prepared by
White Bluffs Consulting
Kennewick, Washington 99338

FINAL

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2 Public Participation Goals and Objectives 3

3 Public Meetings and Communications 4

4 Public Involvement and Outreach Strategies 6

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4.4 Work Products 7

4.5 Public Comment 7

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5.2 Documentation 8

FINAL

ABBREVIATIONS

County	Benton County
GMA	Growth Management Act
PPP	*Benton County Public Participation Plan*
RCW	Revised Code of Washington

1 Introduction and Overview

The Benton County Public Participation Plan (PPP) includes guidelines and procedures for early and continuous public participation related to the Growth Management Act (GMA; Revised Code of Washington RCW 36.70A) and Benton County's (County) planning processes for the periodic update of the County's Comprehensive Plan and Development Regulations. Common communication strategies are characterized, along with specific strategies, as applicable.

This PPP is intended to guide and form the basis for public participation. The County will comply with this PPP and the County's approved January 2024 PPP, which provides overall guidance to County public involvement efforts. This 2026 Comprehensive Plan PPP is consistent with the County's more general PPP but provides additional detail on recently updated state requirements and how outreach efforts will target input and participation from disadvantaged and underserved areas in Benton County. Updates and amendments to the Plan and development regulations are necessary to reflect current laws, local needs, new data, correct errors, and/or clarify intent.

As the planning process develops, it should be expected that deviations from the PPP may be warranted, and the GMA recognizes such deviation may occur per RCW 36.70A.140 provided the spirit and procedures of the PPP are observed.

The periodic update cycle was changed in 2022 by the Washington State Legislature by the approval of HB 1241 which changed the recurrence from eight to ten years after the 2024-2027 update cycle. Other new laws were passed by the State Legislature changing Growth Management Act planning and local regulation requirements that apply to the 2024-2027 and future periodic update cycle such as:

HB 1220 – Counties and cities/towns must plan for and accommodate, rather than encourage the availability of emergency and affordable housing

HB 1717 – New regulations for cities and counties to include local and regional tribes in planning processes and decisions

HB 2001 – Expands the ability to build tiny houses

SB 5042 – Changes the initial effective date of certain actions under the GMA

SB 5118 – Supports successful reentry for juveniles, amending the definition of "essential public facilities"

SB 5235 – Increasing housing unit inventory by removing arbitrary limits on housing

SB 5275 – Enhances opportunity in Local Areas of More Intense Rural Development or LAMIRDs

SB 5368 – Encourages rural economic development

SB 5593 – Allows a county to make revisions to a UGA boundary to accommodate patterns of development

SB 5818 – Promoting housing construction in cities through amendments to and limiting appeals under SEPA and GMA.

2 Public Participation Goals and Objectives

The County recognizes the importance of early and continuous public participation to adequately reflect the County's residents' input. The goal of the PPP is to make all residents of the County aware of the Comprehensive Plan update process and identify opportunities for providing public input. Taken individually, the activities are not expected to reach and inform each and every resident of the County. Collectively, however, the plan activities are designed to effectively and efficiently provide broad-based dissemination of information and maximize opportunity for resident involvement and comment.

The following goals for public input are incorporated into the decision-making process:

- Provide interested parties with timely information, an understanding of the process, and multiple opportunities to review and comment on proposed amendments to the Comprehensive Plan.
- Actively solicit information from residents, property owners, and stakeholders about their concerns, questions, and priorities for the 2026 Comprehensive Plan update process.
- Encourage interested parties to informally review and comment on proposed changes to the Comprehensive Plan throughout the process and provide those comments to decision makers.
- Provide forums for formal public input at project milestones prior to decision-making by local officials.
- Consult and consider input from neighboring jurisdictions; federal, state and local agencies; and Native American tribes.

3 Public Meetings and Communications

The following are key meetings, workshops, and open houses that will be hosted by the County and the Benton County Planning Commission to encourage outreach and public involvement throughout the Comprehensive Plan review process:

- **Open House.** Benton County will host one or two public open houses in 2025 to inform the public on the 2026 Comprehensive Plan review and update process, progress to date, and next steps.
- **Planning Commission Meetings.** Upon completion of preliminary drafts of updated Comprehensive Plan elements, the Benton County Planning Commission will receive presentations at one or more of their regular scheduled meetings on the updated information, typically at least quarterly. Opportunity for public questions and input will be provided at these meetings.
- **Coordination with State Agencies.** Coordination will be conducted with Washington State Departments of Commerce, Ecology, and Fish and Wildlife, and other interested tribes, and federal, state and local agencies to keep them informed of plan development progress and to solicit their comments early in the Comprehensive Plan periodic update process. Copies of the environmental review documentation, which will be a draft environmental impact statement (EIS), will also be provided to the public and affected tribes and agencies for review and comment as part of the plan review and adoption process.
- **Public Hearing and Formal Comment Periods.** Once the final draft Comprehensive Plan update elements are completed, a formal public review will be conducted under the State Environmental Policy Act (SEPA) (RCW 43.21C) including a draft SEPA EIS public comment period, local public hearing and then final action by the Board of Benton County Commissioners. All comments received during the public hearing and public comment period will be compiled and considered for inclusion in the Comprehensive Plan.
- **Develop and Maintain an Interested Parties List.** Identify interest groups such as the following and share information with these groups and others who request to be on the list:
  - Agencies and organizations included on the County's SEPA distribution list
  - Interested parties list from most recent Comprehensive Plan Update
- **Underserved and Disadvantaged Targeted Outreach Strategy.** Targeted outreach activities will include communications focused on disadvantaged community areas within Benton County. Communications will be provided in English and Spanish, and we will also seek to enlist the support of one or more community organizations to assist in getting the message out on opportunities to provide perspectives and input on the project elements and broader Comprehensive Plan update process-related questions and concerns, as applicable.

Benton County Planning Division staff will place legal notices of hearings and comment periods in the County's official paper, currently the Prosser Record Bulletin. Hearing notices will be published at least 15 days prior to the hearing and shall include the date, time, location and purpose of the hearing. Legal notifications notifying dates and times of open houses and public hearings and comment periods will be distributed to the public via email, and other public postings. Notices will also be provided on the Planning page of the County website and the Comprehensive Plan Update website: 2026 Comprehensive Plan Update - Benton County WA

The Planning Commission will be the primary forum for detailed review and recommendations to the Board of County Commissioners. Interested parties are encouraged to attend and provide comments during the Planning Commission/Board of County Commissioners workshops, open houses, and public hearings. All meetings and hearings before the Planning Commission and Board of County Commissioners will be audio recorded, and the audio recording will be available on the Planning Commission's Agenda page on the County's website. Meeting minutes also will be made available on the Planning Commission's Agenda page on the County's website.

Public workshops will be held generally quarterly in conjunction with the project, along with one or two public open houses. These public meetings will include sharing information on the draft Comprehensive Plan content along with other relevant and related information.

4 Public Involvement and Outreach Strategies

Described below are key strategies developed to encourage outreach and public involvement throughout the Comprehensive Plan update process. Implementation of these strategies is expected to generate meaningful public participation.

4.1 Website

The County's Comprehensive Plan page on the Planning Division's website: 2026 Comprehensive Plan Update - Benton County WA will include a Comprehensive Plan update page. This site will provide a public forum for obtaining Comprehensive Plan update information, including but not limited to the following:

- Status updates
- Meeting notices and agendas
- Draft documents and maps
- An email address for submitting public comments
- An interested party sign up link

4.2 Communications

An email distribution list will be maintained for individuals and groups who wish to receive periodic project announcements, public notices of upcoming public meetings, and other comprehensive planning and development codes update-related information. Those interested in being included on the email distribution list should contact the Benton County Planning Division. Additionally, the County will conduct the following activities:

- The Planning Division will issue news releases announcing the public meeting and hearing times, dates and locations to the local media.
- Public Notice of all public hearings and adoptions will be published under "legals" in the classified section of the Official County Newspaper at least 15 days in advance of the hearing.
- All meetings and hearings before the Planning Commission and Board of County Commissioners will be audio recorded.
- All people desiring to speak or submit written comments will be allowed to do so at all meetings and hearings before the Planning Commission and Board of County Commissioners or during designated comment periods.
- Benton County may utilize one- or two-page information sheets to facilitate the dissemination of public information.

4.3 Methods for Reaching Disadvantaged and Underserved Areas

Outreach to seek input and participation from disadvantaged and underserved areas in Benton County will be addressed as part of the planning process. A portion of Benton County's population are in disadvantaged communities because of climate change (including changes in wildfire risk), environmental health, affordable housing and potentially other factors (based on a national Climate Justice Screening Tool). This project will primarily focus on areas potentially impacted by climate change risks for disadvantaged communities. Notifications will be conducted through a variety of media to maximize awareness and details about public workshops and open house times and locations, and other opportunities for input.

Efforts to reach vulnerable populations:

- Provide Spanish language outreach materials to Hispanic communities.
- Spanish language interpreter at public open houses.
- Outreach to affected Tribes as applicable.
- ADA-compliant access at public meetings.
- When practical, make presentations, documents, and maps accessible to people with disabilities.

4.4 Work Products

The 2026 Comprehensive Plan website will be updated with documents as they become available. Hard copies will be available for the cost of reproduction upon request from the Benton County Planning Division.

4.5 Public Comment

Interested parties will be encouraged to provide comments to the County by letter or email. All comments will be forwarded to the Planning Commission and Board of County Commissioners. The 2026 Comprehensive Plan update webpage will be the central repository for information under consideration.

The Planning Commission will conduct a public comment period on the draft Comprehensive Plan and EIS and hold at least one public hearing to solicit input on the Plan update. The Board of County Commissioners will hold one public hearing before final adoption. The County will coordinate with the Department of Ecology on public notification of comment periods and hearings to take advantage of Ecology's optional Comprehensive Plan amendment process that allows for a combined state-local comment period (WAC 173-26-104).

5 Public Involvement, Implementation and Documentation

5.1 Public Participation Timeline

The following is a general timeline including anticipated public participation opportunities. Benton County will coordinate with the Washington State Department of Commerce throughout the process.

- Public Open Houses – Fall 2025
- Planning Commission workshops tentatively planned for every quarter
- SEPA Public Scoping Meeting – April 8, 2025, at the Planning Commission meeting
- Planning Commission Hearing with County/State combined public comment period on draft Comprehensive Plan Amendments/draft SEPA EIS – Spring 2026
- County Commission and State Agency adoption by June 30, 2026

5.2 Documentation

All public outreach efforts and the results of those efforts will be documented in the administrative record maintained by the County. Documentation will include invitation letters and responses, meeting and hearing notices, meeting materials, meeting notes with attendance and comments received, draft and final work products, and other information as applicable.

Appendix C
Benton Countywide Planning Policies

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ORDINANCE NO. 664

AN ORDINANCE relating to county planning; adopting updated Benton County Countywide Planning Policies.

BE IT ORDAINED BY THE BOARD OF COUNTY COMMISSIONERS OF BENTON COUNTY, WASHINGTON:

Section 1. The following new section is hereby made part of Title 16 of the Benton County Code but will not be codified.

COUNTYWIDE PLANNING POLICIES. The attached Countywide Planning Policies are hereby adopted pursuant to RCW 36.70A.210 as the countywide planning policies for Benton County and the cities therein.

Section 2. Severability. If any provision of this ordinance is declared unconstitutional, or the applicability thereof to any person or circumstance is held invalid, the constitutionality of the remainder of the ordinance and the applicability thereof to other persons and circumstances shall not be affected thereby.

Section 3. Effective Date. This ordinance shall take effect and be in full force upon its passage and adoption.

ADOPTED AND PASSED this 24th **day of** February **2026.**

DocuSigned by:
Michael Alvarez
D6C8F67E24874E4...
Chairman of the Board.

DocuSigned by:
Will Mckay
1958B7B784E74CF...
Chairman Pro-Tem.

DocuSigned by:
Jerome Delvin
7ED07003283E480...
Member.

Approved as to Form:

Deputy Prosecuting Attorney

Constituting the Board of County Commissioners of Benton County, Washington

Attest: DocuSigned by: Amanda Penn
Clerk of the Board

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Exhibit A

INTRODUCTION AND OVERVIEW:

The Washington State Growth Management Act (GMA) requires that cities and counties adopt comprehensive plans. The GMA further requires that counties adopt Countywide Planning Policies (CWPPs), in cooperation with the cities located in whole or in part within the county. CWPPs establish a countywide framework for developing and adopting county and city comprehensive plans. The role of the CWPPs is to coordinate comprehensive plans of jurisdictions in the same county for regional issues or issues affecting common borders (RCW 36.70A.100). Under state law, RCW 36.70A.210(1) describes the relationship between comprehensive plans and CWPPs. It states:

> *a 'countywide planning policy' is a written policy statement or statements used solely for establishing a countywide framework from which county and city comprehensive plans are developed and adopted pursuant to this chapter. This framework shall ensure that city and county comprehensive plans are consistent as required in RCW 36.70A.100. Nothing in this section shall be construed to alter the land use powers of the cities.*

In order to achieve the objectives above, and to ensure that regional planning efforts and governmental actions are consistent with current legal requirements and information, these updated Benton County CWPPs are proposed. The updates were made through a collaborative process with the County and the cities.

HISTORY:

In 1991, one year after the Washington State Legislature enacted the Growth Management Act (GMA), the GMA was amended to require that CWPPs be adopted within those counties subject to the GMA. The first Benton County Countywide Planning Policies were adopted on September 28, 1992.

AMENDMENTS AND ADOPTION:

In the years since the last CWPPs were adopted in Benton County, the GMA has evolved through amendments and judicial interpretations provided by the GMA and the courts. The updated CWPPs attempt to provide procedures for County and city/town coordination to address the latest set of requirements.

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The GMA does not specifically address amendments to the CWPPs; however, it has become apparent that the Benton County CWPPs should be updated to better address countywide planning concerns and coordination between jurisdictions in the County. A public hearing was held by the Benton County Planning Commission on MONTH DAY, 2026.

Benton County is the lead agency for this proposal and has determined that it does not have a significant adverse impact on the environment and a SEPA Determination of Non-Significance was issued on January 9, 2026.

In order to comply with GMA requirements and the adoption/amendment procedures identified below, all jurisdictions in Benton County must agree to the adoption of the revised CWPPs. This process will involve the planning departments, planning commissions, and elected representatives of each jurisdiction. In order to facilitate this process, Benton County, in consultation with the cities, has developed the following adoption/ratification process for the draft CWPPs:

1. Benton County Planning Commission recommendation on proposed CWPPs.

2. The Benton County Board of Commissioners (BOCC) adopts a resolution agreeing in principle to the proposed CWPPs, but acknowledging that changes may need to be made based on input from each jurisdiction. The BOCC's resolution will contain a statement requiring that each jurisdiction ratify the CWPPs adopted by Benton County and will lay out a schedule for future approval steps.

3. CWPPs approved by Benton County BOCC reviewed by each jurisdiction's Planning Commission.

4. The elected body of each jurisdiction passes a resolution which states that the jurisdiction either: (a) supports the CWPPs in their entirety, (b) rejects the CWPPs in their entirety, or (c) supports the CWPPs with specific changes.

5. If specific changes are identified by a jurisdiction in step four, the Benton County Planning Department and Planning Commission may amend the CWPPs and attempt to reconcile any conflicting changes.

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6. The Benton County BOCC adopts, by ordinance, the final CWPPs.

SECTION 1. Countywide planning policy is a written policy statement or statements used solely for establishing a countywide framework from which county and city comprehensive plans are developed and adopted. This framework is designed to ensure that city and county comprehensive plans are consistent with statewide planning policies.

The Growth Management Act requires counties planning under the GMA to adopt a countywide planning policy in cooperation with the cities located in the county. The countywide planning policy is to be a written policy statement or statements used solely for establishing a countywide framework from which county and city comprehensive plans are developed and adopted pursuant to this [GMA] chapter." The purpose for the Benton County Countywide Planning Policies is to meet this requirement of the GMA

Section 2: How to Read Countywide Planning Policies

The policies within the CWPPs have equal importance, and each one should be understood in the context of the entire document. The CPPs specify how directive a policy should be. Many of the policies utilize one of three different words to do this; shall, should, and may and are defined as follows:

- "Shall" means implementation of the policy is mandatory and imparts a higher degree of substantive direction than "should." "Shall" is used for policies that repeat State of Washington requirements or where the intent is to mandate action. However, "shall" cannot be used when it is largely a subjective determination of whether a policy's objective has been met.

- "Should" means implementation of the policy is expected, but its completion is not mandatory. The policy is directive with substantive meaning, although to a lesser degree than "shall" for two reasons. (1) "Should" policies recognize the policy might not be applicable or appropriate for all municipalities due to special circumstances. The decision to not implement a "should" policy is appropriate only if the implementation of the policy is either inappropriate or not feasible. (2) Some "should" policies are subjective; hence, it is not possible to demonstrate that a jurisdiction has implemented

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them.

- "May" means the actions described in the policy are either advisable or are allowed. "May" gives permission and implies a preference. Because "may" does not have a directive meaning, there is no expectation that the described action will be implemented.

SECTION 3. POLICIES TO IMPLEMENT RCW 36.70A.020;

Policy #1: The Comprehensive Plans of Benton County and each of the cities therein shall be prepared and adopted with the objective of facilitating economic prosperity by accommodating growth consistent with the following:

1. Urban Growth Areas: Encourage development in urban areas where adequate public facilities exist or can be provided in a cost-efficient manner consistent with RCW 36.70A.115 & WAC 365-196-325.

2. Reduce Sprawl: Reduce the inappropriate conversion of undeveloped land into low density development lacking adequate services, injurious to ground and surface water quality, destructive to the area's agricultural lands base and less than cost effective relative to public service costs.

3. Transportation. Encourage efficient multi-modal transportation systems that may reduce greenhouse gas emissions and per capita vehicle miles traveled and are based on regional priorities and coordinated with county and city comprehensive plans subject to RCW 36.70A.070 (6) (b) and RCW.70A.070 (6)(a)and WAC 365.196-840.

4. Housing. Plan for and accommodate housing affordable for the range of low to moderate income households and other income levels defined as follows in WAC 365-196-410 (2) (3) (i)(c, RCW 36.70A.536, and RCW 36.70.030 of the County population within the cities and unincorporated Benton County, and consistent with the County/cities developed housing allocation plan. Promote a variety of residential densities and housing types and encourage preservation of existing housing stock in concert with RCW 36.70A.635 and RCW 36.70A.680.

5. Economic development. Encourage economic development throughout the County and cities that is consistent with adopted comprehensive plans. Promote economic opportunity for all citizens, especially for unemployed and for disadvantaged persons. Promote the

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retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the County's natural resources, public services, and public facilities subject to RCW 36.70A.020(5). Countywide planning policies are required to include consideration of commercial and industrial facilities.

6. Property rights. Private property rights shall not be taken for public use without just compensation having been made, consistent with the Washington State Constitution, Section 16. The property rights of landowners shall be protected from arbitrary and discriminatory actions.

7. Permits. Maintain a permit review process that provides for integrated and consolidated review and are processed in a timely and fair manner to ensure predictability.

8. Rural and Resource Lands. Maintain and encourage natural resource-based industries, including agricultural, fisheries and mineral industries subject to RCW 36.70A.170 and RCW 36.70A.030(36). Encourage the conservation and improvement of productive agricultural lands and discourage incompatible uses.

9. Open space[1] and recreation. Encourage the retention of open space and the development of recreational opportunities, enhance fish and wildlife habitat and increase access to natural resource lands and water.

10. Environment. Protect and enhance the environment and enhance the region's high quality of life, including air and water quality and the availability of water.

11. Citizen participation and coordination. Encourage the involvement of all citizens in the planning process and ensure coordination between communities and jurisdictions to reconcile conflicts.

12. Public Capital facilities and Essential Public Facilities. Ensure that those public facilities and services necessary to support development shall be adequate to serve development at the time the development is available for occupancy and use without

[1] Per RCW 36,70A.160, *"Open Space" is defined as lands useful for recreation, wildlife habitat, trails, and connection of critical areas.*

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decreasing current service levels below locally established minimum standards. With the exception of water, sewer, and local access streets, which shall be available at the time of occupancy, the term "adequate" shall be defined as either available at the time of occupancy, or shown on the current Capital Improvement Plan (CIP), as a funded project within six years subject to RCW 36.70A.210 (3)(c), RCW 36.70A.200,RCW 36.70A.130, and WAC 365-196-415.

13. Cultural and historic resources protection and preservation. Identify, preserve, and protect historic, cultural, and archaeological resources in collaboration with federally recognized Indian tribes and applicable federal, state and local agencies through land protection, avoidance, mitigation and other related strategies.

14. Climate change and resiliency. Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies under RCW 36.70A.210 and chapter 47.80 RCW adapt to and mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental, economic, and human health and safety; and advance environmental justice.

15. Shorelines of the state. For shorelines of the state, the goals and policies of the shoreline management act as set forth in RCW 90.58.020 shall be considered an element of the county and city comprehensive plans.

SECTION 4. POLICIES FOR PROMOTION OF CONTIGUOUS AND ORDERLY DEVELOPMENT AND THE PROVISION OF URBAN SERVICES TO SUCH DEVELOPMENT;

Policy #2: The County, in consultation with the cities, shall allocate future projected populations to support comprehensive plan amendments and updates using the latest population projections published by the Washington State Office of Financial Management (OFM). Allocation of future populations shall be based on the OFM data and projection ranges (Low, Medium and High) but also consider recent year housing and development trends, land capacity analysis and other related information identified in RCW 36.70A.070 (2)(c).

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Policy #3: Locating Urban Growth Areas within the County shall be accomplished using accepted planning practices which provide sufficient land and service capacity, up to the determined need, to meet projected populations at urban densities and service standards within the cities, and urban densities for those portions of the County located within the urban growth areas.

If, during the County's review of UGA areas with cities or during the County's annual amendment process, the County determines that revision of the urban growth areas are not required to accommodate the urban growth projected to occur in the county for the succeeding 20-year period, but does determine that patterns of development have created pressure in areas that exceed available, developable lands within the urban growth area, the urban growth area or areas may be revised (UGA swaps) to accommodate identified patterns of development and likely future development pressure for the succeeding 20-year period if the following requirements per RCW 26.70A.110 (8)(or as amended) (*annual amendment process*) or RCW 36.70A.130 (3)(c)(or as amended) (*periodic update process*) are met:

- The revised urban growth area may not result in an increase in the total surface areas of the urban growth area or areas
- The areas added to the urban growth area are not or have not been designated as agricultural, forest, or mineral resource lands of long-term commercial significance
- If the areas added to the urban growth area have previously been designated as agricultural, forest, or mineral resource lands of long-term commercial significance, either an equivalent amount of agricultural, forest, or mineral resource lands of long-term commercial significance must be added to the area outside of the urban growth area, or the county must wait a minimum of two years before another swap may occur (***annual amendment process only***)
- Less than 15 percent of the areas added to the urban growth area are critical areas
- The areas added to the urban growth areas are suitable for urban growth
- The transportation element and capital facility plan element have identified the transportation facilities, and public facilities and services needed to serve the urban growth area and the funding to provide the transportation facilities and public facilities and services
- The urban growth area is not larger than needed to accommodate the growth planned for the succeeding 20-year planning period and a reasonable land market supply factor (***periodic update***

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process only)

- The areas removed from the urban growth area do not include urban growth or urban densities
- The revised urban growth area is contiguous, does not include holes or gaps, and will not increase pressures to urbanize rural or natural resource lands
- The county's proposed urban growth area revision has been reviewed according to the process and procedure in the countywide planning policies adopted and approved according to RCW 36.70A.210 (***annual amendment process only***)

Policy #4: Urban Growth Areas for each city shall be based upon official and accepted population projections for a minimum of 20 years (see also policy #2). The gross undeveloped and underdeveloped acreage within the city limits and the Urban Growth Area shall be sufficient to meet all the land requirements, for the following: community and essential public facilities, population projection, commercial and industrial activities, employment projections, infill and to prevent inflation of land cost due to a limited land supply.

a. The jurisdictions within the county shall use a uniform formula for identifying the land area necessary per capita for each community. Each jurisdiction's population projection shall be multiplied by its gross per capita land area requirement, which in the aggregate will define total land needs within the Urban Growth Area (UGA).

The uniform formula is as follows:

A + B + C + D + E + F + G + H + I + J + K = acreage/per capita (or acreage per dwelling unit if per capita is divided by average household size) where:

A = residential land per capita; (or DU)
B = parks and recreational area per capita;
C = area required for public facilities (fire stations, jails, etc.,) per capita;
D= area required for schools per capita;
E = commercial area per capita, or per employee;
F = industrial/manufacturing area per capita;
G = open space (golf courses, etc.) per capita;
H = public service lands required for transportation network, easements and R.O.W.s per DU;
I* = use 70% build-out for all residential lands;

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J = add 25% to the total of A Through I for land supply/demand balance;
K = land credit for undevelopable lands i.e. Critical Areas including steep slopes, wetlands, habitat, etc. within the UGA.

* The same factor should be used for all jurisdictions.

Policy #5 : Within the urban growth area, urban uses shall be concentrated in and adjacent to existing urban services or where they are shown on a Capital Improvement Plan to be available within 6 years.

Policy #6: Cities will limit the extension of service district boundaries and water and sewer infrastructure to areas within each jurisdiction's urban growth area contained in their adopted Comprehensive Plan. Utility plans should attempt to reflect possible needs for a minimum of 20 years.

Policy #7: Within each Comprehensive Plan, the Land Use Plan for urban growth areas shall designate urban densities and indicate the general locations of greenbelt and critical areas.

Policy #8: Consider other variables, such as existing unused service infrastructure. Also, avoid placing an urban growth line into an area of designated resource lands.

Policy #9: Appropriate lands for urban growth expansion are typically those unincorporated lands with existing service infrastructure adjacent to corporate limits.

Policy #10: All policies within each jurisdiction's Comprehensive Plans shall be modified to be consistent with adopted Countywide Policies.

SECTION 5. POLICIES FOR SITING PUBLIC FACILITIES OF A COUNTYWIDE OR STATEWIDE NATURE;

Policy #11: The county and cities shall develop a cooperative regional process, including public participation (see Policy #1, item 11), to site essential public facilities of regional and statewide importance. The objective of the process shall be to ensure that such facilities are located with appropriate provisions that protect environmental quality, optimize access and usefulness to all jurisdictions, and equitably distribute economic benefits/burdens throughout the region or county.

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At the Countywide and multi-county level, the following action should be accomplished:

a. Develop a uniform siting procedure which enables selection of optimum project sites and appropriate size and scale relative to intended benefit area.

Policy #12: Support the existing solid waste program that promotes and maintains a high level of public health and safety, protects the natural and human environment of Benton County and encourages public involvement in the planning process.

Policy #13: Encourage and expand coordination and communication among all jurisdictions and solid waste agencies/firms in Benton and Franklin Counties in order to develop consistent and cost-effective programs that avoid duplication of effort and gaps in program activities.

a. Utilize the existing Benton-Franklin Solid Waste Advisory Committee.

SECTION 6. POLICIES FOR COUNTYWIDE TRANSPORTATION FACILITIES AND STRATEGIES;

Policy #14: Maintain active county-city participation in the Regional Transportation Planning Organization in order to facilitate city, county, and State coordination in planning regional transportation facilities and infrastructure improvements to serve essential public facilities including Port District facilities and properties subject to RCW 47.80.030.

SECTION 7. POLICIES THAT CONSIDER THE NEED FOR AFFORDABLE HOUSING, SUCH AS HOUSING FOR ALL ECONOMIC SEGMENTS OF THE POPULATION AND PARAMETERS FOR ITS DISTRIBUTION;

Policy #15: The county and cities shall work together to provide housing for all economic segments of the population within the cities and unincorporated Benton County (RCW 36.70A.070 (2)(c)(d). All jurisdictions shall seek to create the conditions necessary for the construction of middle,[2] accessory dwelling units (ADU) and other housing, at the appropriate densities within the cities and County, including UGAs. The following actions should be

[2] Middle housing is a range of housing types, from duplexes to sixplexes, townhomes, courtyard apartments and cottage housing, intended to be compatible with single-family neighborhoods.

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accomplished:

a. Jointly quantify and project total Countywide housing need by income level and housing type (i.e. rental, ownership, senior, farm worker housing, group housing.)

b. Allocate the Countywide housing need through developing and updating a housing allocation plan that provides housing allocations to each jurisdiction and develop and update housing elements for each jurisdiction to address how to meet each jurisdiction's individual allocation of the projected Countywide need.

c. Accommodate moderate, low, very low, and extremely low-income households within unincorporated areas of the County and cities according to the housing allocation plan.

d. Conduct an inventory and analysis of existing and projected housing needs by income band, consistent with each jurisdiction's share of the determined Countywide housing need.

e. Provide for the preservation, improvement and development of housing.

f. Provide moderate density housing options within urban growth area boundaries, including a range of middle housing types.

SECTION 8. POLICIES FOR JOINT COUNTY AND CITY PLANNING WITHIN URBAN GROWTH AREAS;

Policy #16: Urban growth areas may include territory located outside of a city if such territory may be characterized by urban growth or is adjacent to territory already characterized by urban growth. Within urban growth areas, only urban development may occur. For the purposes of locating urban growth areas, and permitting new development within them, "Urban" is defined as:

a. Having dedicated and improved (surfaced) streets, with dimension, design and construction standards for new development determined by "joint city/county standards" and;

b. For new development, road, street and intersection right-of way widths located and sized to accommodate projected local and regional average daily traffic (ADT) as determined by each jurisdictions Land Use Plan Transportation Element and,

Docusign Envelope ID: A0A8E9B5-5318-4155-BAFE-78FA2AA685C5

where relevant, projections of the Benton Franklin Council of Governments.

Policy #17: To encourage logical expansions of corporate boundaries into urban growth areas, and to enable the most cost efficient expenditure of public funds for the provision of urban services into newly annexed areas. The County and each city may jointly develop and implement development, land division and building standards, and coordinated permit procedures for the review and permitting of new subdivisions within Urban Growth Areas.

a. Joint development standards may be adopted by all jurisdictions. Standards may vary between the County and various incorporated jurisdictions.

SECTION 9. POLICIES FOR COUNTYWIDE ECONOMIC DEVELOPMENT AND EMPLOYMENT;

Policy #18: Comprehensive Plans shall jointly and individually support the County and region's economic prosperity in order to promote employment and economic opportunity for all citizens consistent with the protection of public health, safety, welfare, and the use of natural resources on a long-term sustainable basis, the ability of service capacity to accommodate demands, and the expressed desires of each community,.

Policy #19: The county and cities have historically partnered with each other as well as with other organizations to achieve economic development throughout the region. The county and cities intend to continue to actively pursue mutually beneficial partnerships that promote growth in all sectors of business and industry, including but not limited to: areas of agriculture, agri-business, industrial, commercial, public schools, recreation and tourism. Key strategies will include promoting family wage jobs, increasing income and reducing poverty, increase business formation, expansion and retention, and creating jobs and financial investment to improve the economic conditions within our communities.

a. An economic development element should be integrated into the comprehensive plan of each jurisdiction, with particular attention being given to coordination with the land use and capital facility elements. The economic development element should establish goals and policies for each jurisdiction; actively promote employment opportunities for family-wage

Docusign Envelope ID: A0A8E9B5-5318-4155-BAFE-78FA2AA685C5

jobs; support the retention and expansion of businesses and industry in Benton County; support development of public schools; encourage the development of tourist-related businesses, including those that capitalize on area agricultural and other resources.

b. Comprehensive Plans should foster and promote a natural environment that conserves resources and contributes to economic growth and prosperity, and a business environment that offers diverse economic opportunities for businesses of all types and sizes in the region.

c. The county and cities should encourage public and private agency cooperation and participation in the comprehensive planning process. These agencies should cooperatively evaluate trends and opportunities to identify strategies meeting long-term economic needs for the County and Cities.

d. The county and cities agree that Benton County may establish economic development strategies and implementation criteria for siting major industrial and resource-based development within rural areas of the County in accordance with RCW 36.70A.365.

e. The provision of utilities and other supporting urban governmental services to commercial and industrial areas should be coordinated and assigned a high priority by utility purveyors and service providers.

f. Subject to funding availability, a Countywide land use inventory may be developed and periodically updated to monitor commercial and industrial land supply and future needs, and support adjustments in land use designations, as applicable.

SECTION 10. AN ANALYSIS OF THE FISCAL IMPACT.

Policy #20: Capital Improvement Plans and Land Use Plans, shall conduct fiscal analyses as identified in RCW 36.70A.070 (3) (4) which identify and refine the most cost effective use of regional and local public services. This should be accomplished through actions including the following:

a. City's six-year CIPs for transportation and utility (stormwater, wastewater, water, and broadband) infrastructure sized to accommodate build-out of service areas within the

Docusign Envelope ID: A0A8E9B5-5318-4155-BAFE-78FA2AA685C5

20-year urban growth area, at a minimum.

b. Construction design and placement standards for roads, intersections and streets (with provisions for storm water conveyance), sewer, water and lighting infrastructure, should be determined based upon an analysis which identifies the lowest public expenditure over extended periods of time. Utilities should be incorporated into such analyses.

c. Build out scenarios should be factored into school, fire/emergency medical services (EMS) and police service demand projections.

SECTION 11. Coordination with Tribal Governments

Policy #21: Benton County and cities will coordinate with area tribal governments in accordance with RCW 36.70A.210(4) and RCW 36.70A. (3) (i) tied to the Washington Growth Management Act.

SECTION 12. AMENDING POLICIES.

Policy #22: This document is a tool that will provide the necessary guidance to achieve consistency during the updating of comprehensive plans for the county and the cities/towns consistent with the GMA.

The County Commissioners will review the policies and cause a final proposal to be transmitted to the cities for ratification and ultimately back to the Board of Commissioners for final action. The County Wide Planning Policies will be considered adopted when ratified by the cities and approved by the Board of Commissioners. Cities agree to take action within 45 days of the transmittal of the proposal and to submit resolutions of ratification to the county to document the action taken by the city.

The Board of Commissioners agrees to adopt the ratified policies without modification upon receipt of notice that at least three cities have acted affirmatively. The Commissioners will consider possible modifications to these policies if ratification is not accomplished.

Future amendments to the County Wide Planning Policies may be considered when proposed by the County or a city.

Appendix D1
Richland UGA Amendment Application

Community Development Department
102206 East Wiser Parkway
Kennewick, WA 9933

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

Received
NOV 2 6 2025
Benton County Planning Division

BENTON COUNTY PLANNING DIVISION APPLICATION
COMPREHENSIVE PLAN - URBAN GROWTH AREA AMENDMENT

CPA File No. CPA 2026-001

NAME OF CITY: Richland, Washington

MAILING ADDRESS: 625 Swift Blvd., MS-35 Richland, WA 99352

CONTACT PERSON: Mike Stevens (Planning Manager)

EMAIL ADDRESS: mstevens@richlandwa.gov

TELEPHONE: (509) 942-7596

Please answer the following questions, if more space is needed please use attachments.

1. Addresses, parcel numbers and legal description of properties proposed for inclusion in the UGA: (add additional pages if necessary)

A. Badger Mountain Hill Top – ***UGA Removal***	
Address	Undetermined
Parcel number	1-289-8400-000-0000 (ALL) and 1-289-8200-000-2002 (Portion)
Legal Description	Parcel 1-289-8400-000-0000: SOUTH HALF OF THE SOUTHEAST QUARTER, & THE SOUTH HALF OF THE NORTHWEST QUARTER OF THE SOUTHEAST QUARTER, ALL IN SECTION 28, TOWNSHIP 9 NORTH, RANGE 28 EAST, W.M. BENTON COUNTY, WASHINGTON The complete legal description for Parcel 1-289-8200-000-2002: All of Section 28, Township 9 North, Range 28 East, W.M., Benton County Washington; EXCEPT the North half of the Northeast quarter of Section 28, Township 9 North, Range 28 East, W.M., lying Southerly and Westerly of a line drawn from the Southeast corner of said section to a point 2000 feet North of the Southwest corner of said section; AND EXCEPT a portion of land located in the Southwest quarter defined as follows: Commencing at the North quarter corner of said Section 28, Township 9 North, Range 28 East, W.M.; thence South 10°01'52" West for 3337.15 feet to U.S.C. and G.S.

	Triangulation State "Erie"; thence North 19°17'24" East for 105.95 feet to the Northwest corner of a microwave building site as said site is described in that certain assignment of lease recorded under Auditor's File No. 446559 and the True Point of Beginning; thence North for 87.00 feet; thence West for 50.00 feet; thence South for 100.00 feet; thence East for 50 feet; thence North for 13 feet to the True Point of Beginning; AND EXCEPT the South half of the Southeast quarter and the South half of the Northwest quarter of the Southeast quarter; AND EXCEPT that portion of the South half of the Northeast quarter defined as follows: Beginning at the Southeast corner of the Northwest quarter being the True Point of Beginning; thence North 00°30'34" East along the East line of said section a distance of 1297.69 feet to the Northeast corner of said South half; thence North 89°33'51" West along the North line of said South half a distance of 2612 feet to the Northwest corner thereof; thence South 00°05'01" West along the West line of said South half a distance of 36.60 feet; thence South 63°46'35" East a distance of 2898.79 feet to the True Point of Beginning; AND EXCEPT that portion of the Northeast quarter of the Northwest quarter of Section 28, Township 9 North, Range 28 East, W.M., defined as follows: Beginning at the Northeast corner; thence South along the East line of the Northwest quarter a distance of 1320 feet; thence on a 45°00 00" diagonal line to the Northwest corner of the Northeast quarter of the Northwest quarter; thence East for 1320 feet to the True Point of Beginning; EXCEPT that portion of the West half of Section 28, Township 9 North, Range 28 East, W.M., Benton County, Washington described as follows: Beginning at the Northeast corner; Thence South along the East line of the Northwest quarter a distance of 1320 feet; thence on a 45°00'00" diagonal line to the Northwest corner of the Northeast quarter of the Northwest quarter; thence east for 1320 feet to the True Point of Beginning; EXCEPT that portion of the West half of Section 28, Township 9

	North, Range 28 East, W.M., Benton County, Washington, described as follows: Beginning at the Northwest corner of said Section 28; thence South 0°19'13" East along the West line of said section 2670.58 feet to the West quarter corner of said Section 28; thence North 77°35'14" East 545.50 feet to the True Point of Beginning; thence South 67°15'52" East 226.09 feet; thence North 72°22'39" East 625.19 feet; thence South 60°39'13" East 1104.14 feet; thence South 16°57'54" West 453.26 feet; thence North 82°06'36" West 245.56 feet; thence North 65°02'13" West 1178.69 feet; thence South 87°34'33" West 351.21 feet; thence North 04°30'54" East 357.57 feet to the True Point of beginning.

B. Harvest Ridge Addition – ***UGA Addition***	
Address	Undetermined (Harvest Ridge Tract A)
Parcel number	1-058-8101-000-1000
Legal Description	HARVEST RIDGE, TRACT A. RECORDED IN VOLUME 15 OF PLATS AT PAGE 0768, RECORDS OF BENTON COUNTY, WASHINGTON. AF# 2024-001403, 01/24/2024.

C. Dallas Road Recreation Center Addition – ***UGA Addition***	
Address	12702 N Dallas Road
Parcel number	1-299-8201-246-5001 (Portion of approx. 190 acres)
Legal Description	The complete legal description for the parcel is: Section 29 Township 9 Range 28 SHORT PLAT #2465 LOT 1 99-038122. (This parcel also crosses into sections 28, 32 & 33)

D. Inclusion of the Harvest Ridge (2024 Subdivision) site and the Kennewick School District school site – ***UGA Addition***	
Address	Various addresses on Haystack Street, Harvest Ridge Loop, Grange Street and Ambrosia Street and KSD site: Undetermined
Parcel number	The series of parcels numbered 1-058-8101-000-0001 through 1-058-8101-000-0042 and KSD site: 1-058-8402-000-0053
Legal Description	Harvest Ridge, Lots 1 through 42 and KSD site: THAT PORTION OF LOT 1, PLAT OF THE RIDGE AT REATA WEST PHASE 1, ACCORDING TO THE SURVEY THEREOF RECORDED UNDER AUDITOR'S FILE NUMBER 2012-034163, RECORDS OF BENTON COUNTY, WASHINGTON, SITUATE IN SECTION 4 AND 5 TOWNSHIP 8 NORTH, RANGE 28 EAST W.M.

2. Prepare and attach a site map and aerial photo showing the proposed area in which a UGA amendment is being sought. Please show clearly the following: the proposed UGA boundary, current corporate boundaries, major physical boundaries; both natural and man- made (i. e., including but not limited to highways, railroads, rivers, streams, power lines, schools, and other public outbuildings, critical areas, open space, etc.), the proposed land use designations, pattern and acreages of urban land uses and densities for the area proposed for inclusion, with any residential areas requiring a minimum average density of six (6) dwelling units per acre, the general location and acreage of planned open spaces and greenbelts that will remain as open space within the area(s) proposed for inclusion within a UGA, as per RCW 36.70A.110(2);section, map scale, north arrow, township and range lines, and date of preparation, are to be shown and identified.

   If in a shoreline area, define existing shorelines area as shown in existing shorelines master plan and indicate the existing environment designation.

   See Exhibits A through E on the following pages.

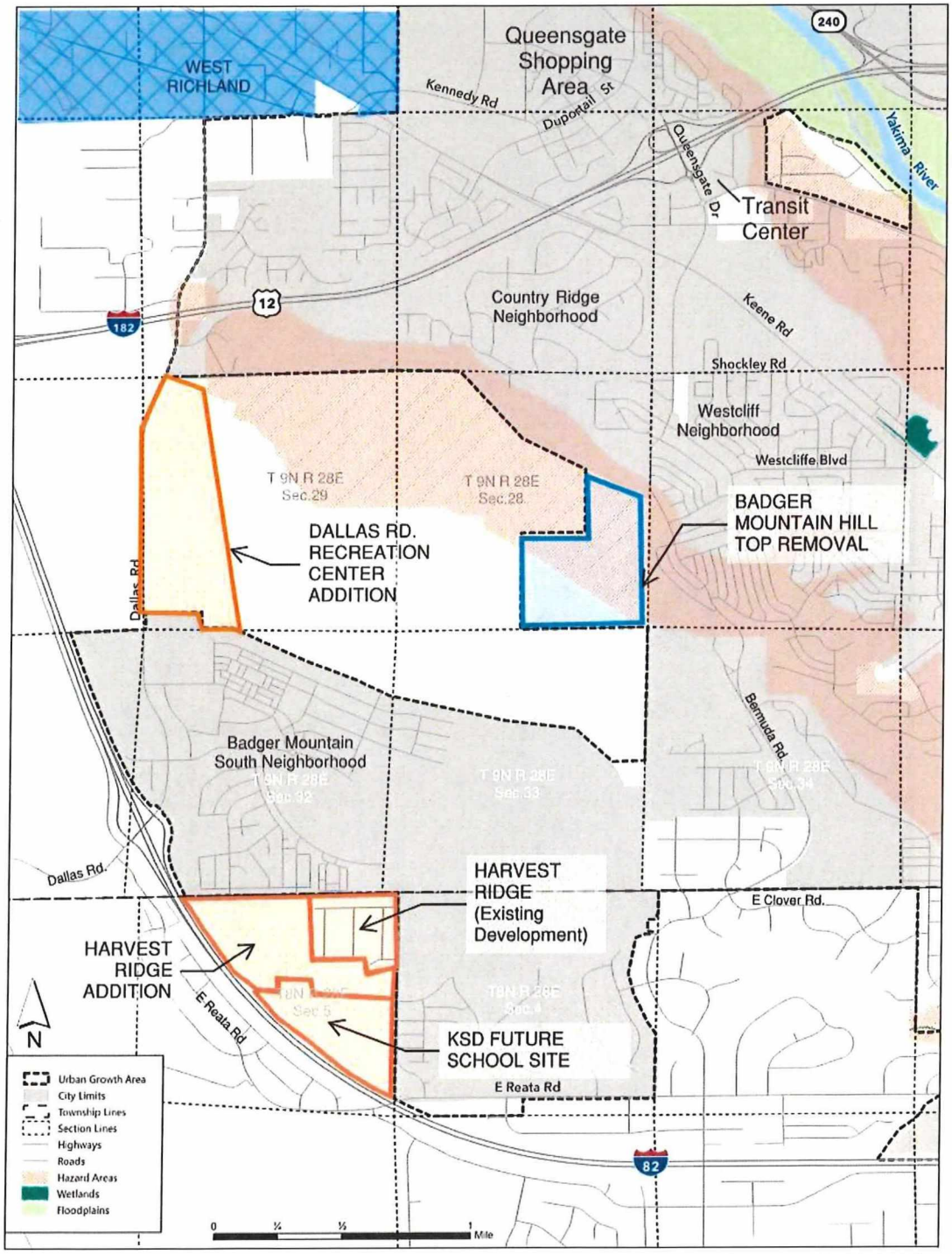


Exhibit A: Site Map with surrounding features, selected critical areas (Prepared 11/25/25)
Note: Critical Aquifer Recharge Areas are not shown; See Exhibit C for Priority Habitat Areas per WDFW



Exhibit B: Aerial Image (Prepared 11/25/25)

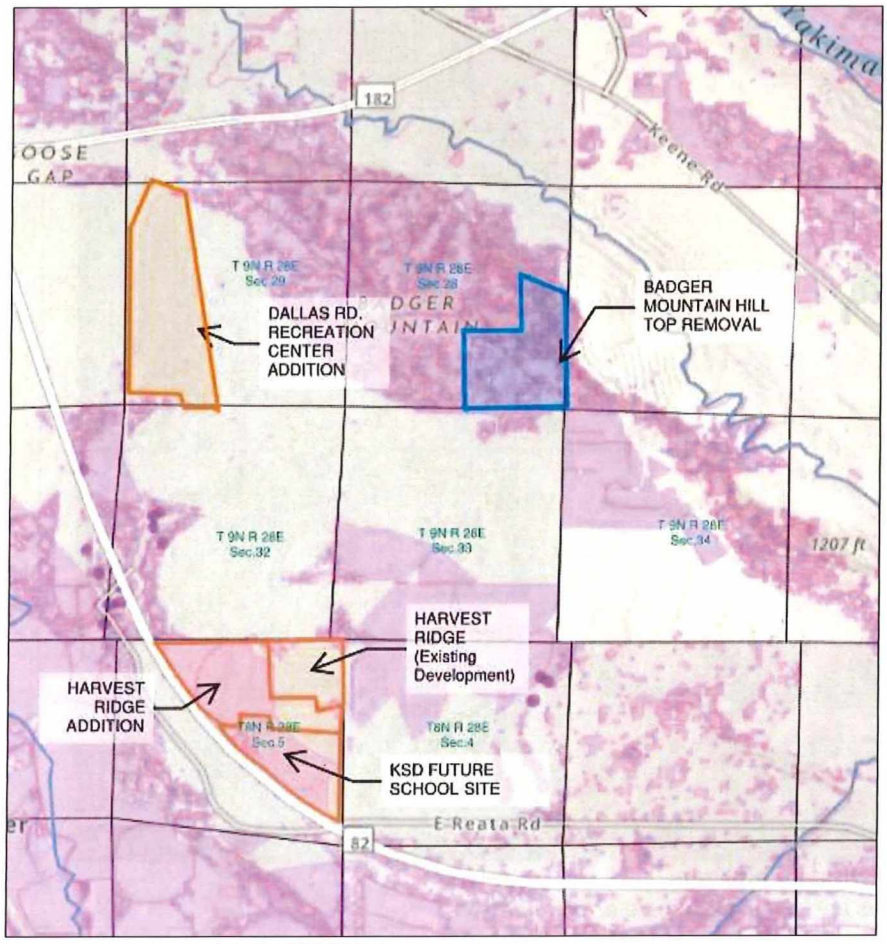


Exhibit C: WDFW Mapped Habitat Areas with annotations (Prepared 11/25/25)



Exhibit D: Drone Photograph with annotations
(Prepared 11/25/25*; Boundaries and Sites shown are approximate*)

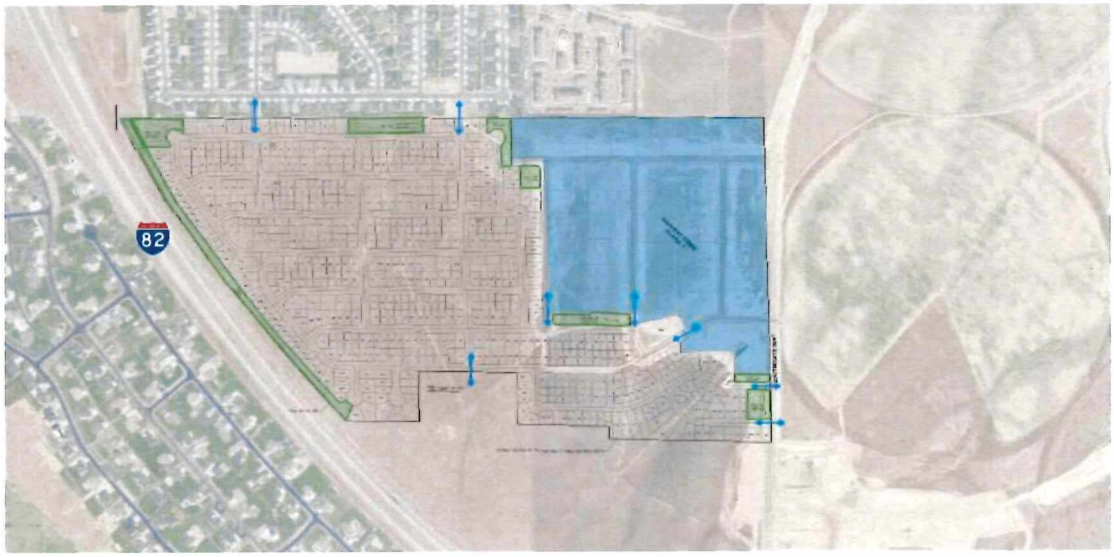


Exhibit E: Harvest Ridge Addition Concept
(Prepared 11/25/25*)*
Note: This is a very preliminary conceptual example demonstrating that the standard of a min. 6 DU/ acre can be achieved; the image shows 611 lots, potential open space areas, and a potential vehicular circulation approach)

3. What is the current use of the property proposed for inclusion in the UGA:

Harvest Ridge Addition	Vacant/ farm production, with an approved preliminary plat for residential construction and use
Dallas Road Recreation Center Addition	Farming
Harvest Ridge (2024 Subdivision)	Single Family Residential / Vacant
KSD Site	Farming

In addition, the current use of the Badger Mountain Hill Top area (requested UGA removal property) is Natural Open Space/ Recreational Trail.

4. What is the existing comprehensive plan designation for the area in which the property proposed for inclusion in the UGA:

Harvest Ridge Addition	RL-1 (Benton County Comprehensive Plan)
Dallas Road Recreation Center Addition	RL-5 (Benton County Comprehensive Plan)
Harvest Ridge (2024 Subdivision) site	RL-1 (Benton County Comprehensive Plan)
KSD Site	RL-1 (Benton County Comprehensive Plan)

In addition, the existing comprehensive plan designation of the Badger Mountain Hill Top area (requested UGA removal property) is Natural Open Space (per the Richland Comprehensive Plan Land Use map).

None of the lands have been designated as Agricultural Lands of Long Term Commercial Significance (ALLTCS). None of the lands are within Shoreline jurisdiction.

5. What is the City's proposed land use designation of the property proposed for inclusion in the UGA:

Harvest Ridge Addition	MDR - Medium Density Residential
Dallas Road Recreation Center Addition	CR - Commercial Recreation
Harvest Ridge (2024) Subdivision site	LDR - Low Density Residential
KSD Site	PBF- Public Facility

6. What are the reasons for the requested amendment and include substantial information why the provisions, map designations, etc., of the adopted plan are not sufficient to satisfy the concern that gives rise to the amendment request:

Harvest Ridge Addition	The property is currently vacant, but has land use entitlements for an approved Preliminary Plat with homes at a 1-acre minimum lot size. The owner would prefer to instead bring the property into the city limits and develop at a much more dense and compact scale. Doing so will support the city's objectives (and mandated

	requirements under the GMA as recently revised) to ensure land is available which is zoned to accommodate housing development that could be attainable to households earning around or below the Average Medium Income (AMI) for the region.
Dallas Road Recreation Center Addition	With the direct frontage along Dallas Road (and good access to I-82), proximity to existing neighborhoods, recreational amenities (including the Badger Mountain Centennial Park), unique location adjacent to city limits on the north and south sides, and infrastructure ready to be extended, the designation of RL-5 (Residential, Low - 5 acre lot minimum size) no longer fits in with the best use and potential of the property. Instead, future aspirations for the property include the development of a year-round sports recreation facility including outdoor multi-use sports fields (soccer, football, lacrosse etc.), softball fields, baseball fields and an indoor sports facility that may include basketball, volleyball etc. Other amenities may include concessions, restrooms, and an amphitheater. Parking in clusters throughout the facility will be included with pathways connecting all aspects of the complex. Open space will be integrated into the overall sport campus design, that will be accessible to the patrons of the facility. Park amenities are to be included throughout the design. Lodging components such as a hotel, groups of nightly rental bungalows, and an RV campsite complex are also envisioned for later stages per market demand, together with a potential restaurant and winery tasting room. This project would employ up to 25 full time staff and over 100 part time staff depending on season and event schedule in the near term. Later, with additional amenities and hotel capacity, these number will grow.

7. Include any other substantiated information that you feel is necessary or relevant for consideration:

The City of Richland has a proven track record of taking a measured and prudent approach when it comes to UGA expansion requests.

- Richland adopted its first Comprehensive Plan prepared under the state Growth Management Act in 1998, and the plan included the UGA boundaries for the city.
- Significant updates occurred in 2008, including adjustments to the UGA boundaries by Benton County to accommodate increased population and development needs. Most significantly, his included the addition of what is now the Badger Mountain South master planned development site which has had steady development.
- Further expansion of the UGA occurred in 2017, limited to lands north of the city limits, which are former federally-owned and control lands that are for industrial

purposes (with no residential capacity added).

- For the 2026 Periodic Update, it is necessary for the city to meet the establish population / housing targets including the income band requirements as established by Commerce's "Housing for All Planning Tool" and while infill development and potential downtown redevelopment will be useful to achieving these requirements, some additional land area for growth where utilities, services, and infrastructure is available is sensible and good planning.

    - The GMA requires comprehensive plans to include a housing element that identifies a "sufficient capacity of land" to accommodate all projected housing needs during the 20-year planning period (RCW 36.70A.070(2)(c)).
    - With recent changes to state law, Richland now must supply a detailed review of capacity among four categories: moderate, low, very low, and extremely low-income households, as defined in RCW 36.70A.030. The income level is relative to "median household income adjusted for household size, for the county where the household is located, as reported by the United States department of housing and urban development."
    - To evaluate residential land capacity by income level, AHBL will use the 6-step process as outlined by the Department of Commerce's Guidance for Updating Your Housing Element (August 2023) with adjustments to address concerns raised to the Growth Management Hearings board over an analysis following this general model conducted in Mercer Island, Washington. This is forthcoming.
    - The income level is relative to "median household income adjusted for household size, for the county where the household is located, as reported by the United States department of housing and urban development." The Department of Housing and Urban Development (HUD) publishes Area Median Income (AMI) for each county (or market area which may include several counties) on an annual basis. The AMI for FY 2025 is $105,600.
    - Benton County has set out the specific housing unit requirements for Richland and the other Benton County jurisdictions according to income band, consistent with the Housing for All Planning Tool (Commerce Guidance) as part of the update to the County-Wide Planning Policies.
    - The City of Richland is allocated housing growth targets (from the year 2020 to 2046) according to income level bands that use the "Average Median Income" benchmark
    - The 2020 "existing" distribution count was provided by the State Dept of Commerce via their "Housing for All Planning Tool" or HAPT.
    - By the year 2046 the City is expected to have 39,770 total housing units, including permanent housing units and temporary housing units / beds (emergency housing), which would be distributed as shown:

Permanent Housing Units by Income Level (% of AMI)

	0-30%							
	PSH	*Non-PSH*	> 30-50%	> 50-80%	> 80-100%	>100-120%	>120%	**Total**
Est. Housing Supply (2020)	0	798	2,690	9,796	4,469	3,275	4,497	**25,525**
Allocated Growth Target (2020-2046)	1,130	1,789	2,817	1,988	1,092	1,237	4,102	**14,155**

Emergency Housing Units

	Beds
Est. Supply (2020)	38
Allocated Growth Target (2020-2046)	52

PSH = Permanent Supportive Housing

The City of Richland has reached a 70% build-out and needs a limited amount of additional lands to accommodate the twenty-year population projection.

- The CWPPs at Policy #4 identify a uniform formula for assessing land needs in the County on a per capita basis and applies a 70% build-out factor to residential lands.
- The Dallas Road Recreation Center UGA expansion request is for non-residential uses and therefore this criterion does not apply. Furthermore, the increase of the acreage is largely offset by the proposed decrease of acres at the Badger Mountain Hill Top removal site.
- This criterion applies to the Harvest Ridge expansion request and the inventory sheet demonstrates the 70% build out is achieved.

The purpose of the proposed UGA removal and additions are primarily intended to better align with the City's objectives and obligations for growth under the Growth Management Act.

1. Increased land for housing supply is needed where higher densities (as compared to typical, single-family development on large lots) can be achieved, and where the neighborhoods can be built in a compact fashion. Furthermore, it is important to increase flexibility in housing types and promote the introduction of middle housing. The Harvest Ridge site would accommodate 611 lots for this type of development, creating an opportunity for the city to fulfill its requirements for 611 or more homes to be built in the forthcoming 20-year period to be offered at a rate attainable to households earning below the AMI.

2. The Harvest Ridge Addition site is located in close proximity to other residential development, will fill in the space between existing residential development and the I-82 right of way (which creates a physical barrier), and can be characterized as a suitable and logical site for the increased use due to the presence of existing water, sewer, electric, and transportation infrastructure that can be readily extended. In this way, the project meets the intent and directives of the GMA to reduce sprawl

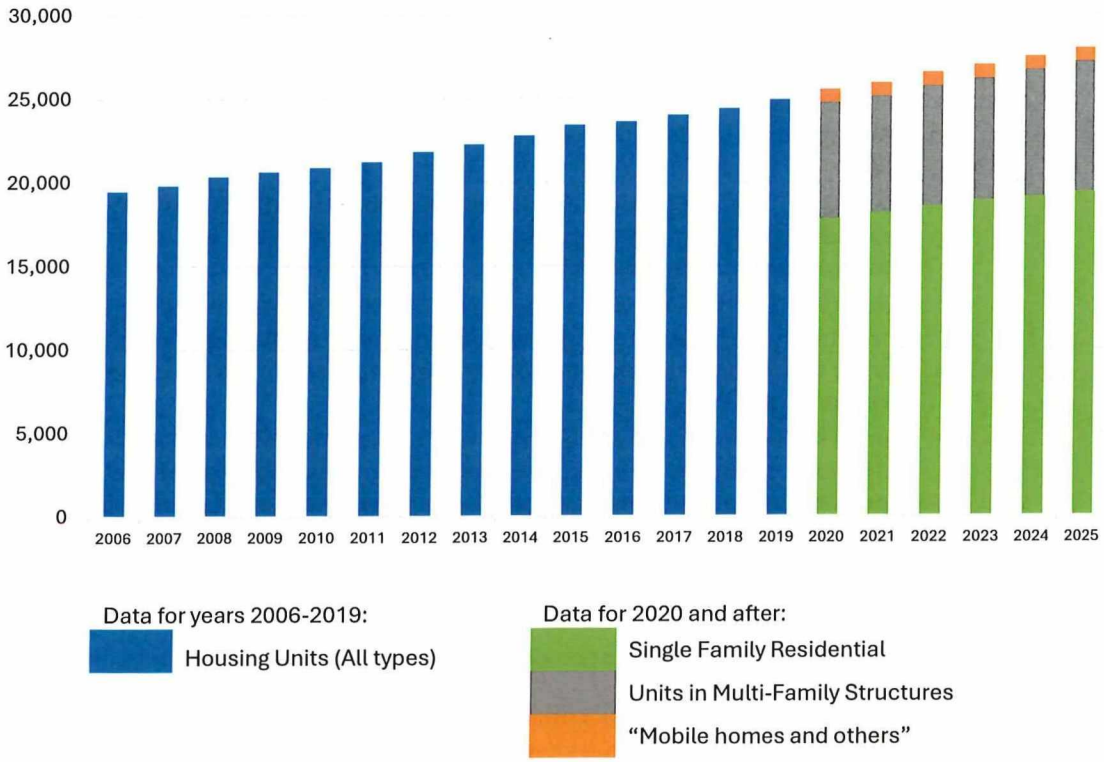
and also to avoid costly extension of infrastructure that would have fewer efficiencies elsewhere.

3. The Dallas Road recreation center site is uniquely well-suited for inclusion in the UGA; situated such that it already abuts city limits to the north and south sides; Badger Mountain is a physical barrier to the east. This site is additionally in close proximity to residential development, and will abut Dallas Road which is a minor arterial. Existing water, sewer, electric, and transportation infrastructure are in place in close proximity which can be readily extended as described in the Capital Facilities Plan.

Conditions have changed since the time and circumstances of the last County Plan adoption and the existing adopted provision is no longer appropriate.

- Benton County and its cities have experienced sustained and significant growth over the past several decades. In light of these changing conditions, it is reasonable to expect that some refinements to UGA boundaries are warranted.
- The City's UGA was last adjusted in 2017 to extend the boundaries to the north, for industrial uses and non-residential land supply increases.
- Richland has seen a steady increase in housing unit supply year-over-year. New housing production did not slow down during the 2009-2011 economic downturn and does not appear to have been negatively impacted by the health crisis of 2020-2021.
- In the year 2025, OFM estimates there are 19,374 housing units in single family homes, 7,789 homes in multi-family structures, and the inventory of "mobile homes and others" is 803.

City of Richland Housing Unit Inventory
2006 - 2025



The proposed amendment is consistent with Chapter 36.70A RCW (Growth Management Act), Benton County Code, the County-wide Planning Policies, and Plan policies.

The proposed amendment is supported by a Capital Facilities review, a land capacity analysis, and the City has demonstrated the need and preference for the change. There are many ways that the proposed amendment is consistent with Chapter 36.70A RCW, Benton County Code, the County-wide Planning Policies, and Plan policies and we are not aware of any inconsistencies.

The proposed change is particularly consistent and in alignment with the following CWPPs (emphases added):

1. *Policy #1:* The Comprehensive Plans of Benton County and each of the cities therein shall be prepared and adopted with the objective of **facilitating economic prosperity by accommodating growth** consistent with the following... *[lists the GMA goals]*
2. *Policy #3:* Locating Urban Growth Areas within the County shall be accomplished using accepted planning practices which provide sufficient land and service capacity, up to the determined need, to meet projected populations at urban densities and service standards within the Cities, and urban densities for those portions of the County located within the urban growth areas.
3. *Policy #5*: Within the urban growth area**, urban uses shall be concentrated in and adjacent to existing urban services** or where they are shown on a Capital Improvement Plan to be available within 6 years.
4. *Policy #6:* Cities will limit the extension of service district boundaries and water and sewer infrastructure to areas within each jurisdiction's urban growth area contained in their adopted Comprehensive Plan. Utility plans should attempt to reflect possible needs for a minimum of 20 years.
5. *Policy #8:* Consider other variables, such as **existing unused service infrastructure**. Also, avoid placing an urban growth line into an area of designated resource lands.
6. *Policy #9:* **Appropriate lands for urban growth expansion are typically those unincorporated lands with existing service infrastructure adjacent to corporate limits**.
7. *Policy #15:* ... All **jurisdictions shall seek to create the conditions necessary for the construction of middle, accessory dwelling units (ADU) and other housing, at the appropriate densities** within the cities and County, including UGAs....
8. *Policy #16*: Urban growth areas may include territory located outside of a city if such territory may be characterized by **urban growth or is adjacent to territory already characterized by urban growth**. Within urban growth areas, **only urban development may occur**.
9. Policy #18: Comprehensive Plans shall jointly and individually support the County and region's economic prosperity in order to **promote employment and economic opportunity for all citizens consistent with the protection of public health, safety, welfare, and the use of natural resources on a long-term sustainable basis, the ability of service capacity to accommodate demands, and the expressed desires of each community...**

Environmental impacts have been disclosed and measures imposed to either avoid or mitigate said impacts.

The City has prepared a SEPA Environmental Review checklist for the non-project action, and additionally listed out known environmental attributes and features of the

sites. A DNS was issued on November 19, 2025 (SEPA Register #202504889.

The sites feature minimal critical areas, and the impacts of future development (residential neighborhood and a Recreation Center) will not be intensive, intrusive, or cause harm to the surrounding land uses.

Please see the SEPA Environmental Review materials for further information.

The City has prepared a Capital Facilities Plan for the proposed UGA Changes. Consistent with the RCWs, the CFP shows generally that the city has, or will have, the resource capacity and capital infrastructure that is necessary for build-out of the entire area that is to be added to the UGA, without adverse effect on its ability to provide service to undeveloped areas within the current UGA.

Please see the Capital Facilities Plan.

Mayor Signature	Printed Name	Date
Authorized City Representative	Printed Name	Date

ANY INFORMATION SUBMITTED TO THE BENTON COUNTY PLANNING DIVISION IS SUBJECT TO PUBLIC RECORDS DISCLOSURE LAW FOR THE STATE OF WASHINGTON (RCW CHAPTER 42.17) AND ALL OTHER APPLICABLE LAW THAT MAY REQUIRE THE RELEASE OF THE DOCUMENTS TO THE PUBLIC.

An application fee of $2000.00 must be submitted with this application. This fee is non- refundable. Please make check payable to Benton County Treasurer.

APPLICANT'S CHECKLIST FOR COMPLETENESS

☒ APPLICATION FORM COMPLETED AND SIGNED WITH REQUIRED FEES

☒ CITY COUNCIL ADOPTED UGA RESOLUTION

☒ MAPS AND AERIAL PHOTOS WITH REQUIRED INFORMATION

☒ UGA INFORMATION SPREADSHEET

☒ CITIES SEPA CHECKLIST, DETERMINATION, OR EIS IF REQUIRED

☒ CAPITAL FACILITIES PLAN AS REQUIRED BY RCW 36.70A.070(3) & RCW 36.70A.03

(residential neighborhood and a Recreation Center) will not be intensive, intrusive, or cause harm to the surrounding land uses.

Please see the SEPA Environmental Review materials for further information.

The City has prepared a Capital Facilities Plan for the proposed UGA Changes. Consistent with the RCWs, the CFP shows generally that the city has, or will have, the resource capacity and capital infrastructure that is necessary for build-out of the entire area that is to be added to the UGA, without adverse effect on its ability to provide service to undeveloped areas within the current UGA.

Please see the Capital Facilities Plan.

Theresa A Richardson	Theresa Richardson	November 26, 2025
Mayor Signature	Printed Name	Date
	Jon Amundson	11/26/2025
Authorized City Representative	Printed Name	Date

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☒ UGA INFORMATION SPREADSHEET

☒ CITIES SEPA CHECKLIST, DETERMINATION, OR EIS IF REQUIRED

☒ CAPITAL FACILITIES PLAN AS REQUIRED BY RCW 36.70A.070(3) & RCW 36.70A.03

Docusign Envelope ID: 372C7238-7657-4259-A181-668585D90E3E

RECEIVED
NOV 2 3 2025
Benton County
Planning Division

RESOLUTION NO. 2025-147

A RESOLUTION OF THE CITY OF RICHLAND, WASHINGTON, AUTHORIZING AN APPLICATION TO BENTON COUNTY FOR AN URBAN GROWTH AREA (UGA) CONTRACTION AND EXPANSION IN THE SOUTHERN PART OF THE CITY.

WHEREAS, the City of Richland is in the process of updating its Comprehensive Plan in accordance with the requirements of the state's Growth Management Act, which directs the City to perform a periodic update no later than December 31, 2026; and

WHEREAS, Benton County is also updating the Comprehensive Plan for the County and has opened the application window, allowing cities within the County to request changes to the Urban Growth Area (UGA), as the UGAs are set by counties per state law, and Benton County only opens such opportunities at limited times; and

WHEREAS, the City of Richland's UGA was last modified during the 2017 Periodic Update when 1,184 acres of land at the Hanford Department of Energy site were added to the UGA and 283 acres of land elsewhere were removed from the UGA, for a net increase of 901 acres, and there was no increased land area added for residential uses at that time; and

WHEREAS, in 2025, Richland was allocated a new growth target of 14,155 housing units by which to increase the housing supply from (from 2020 levels), which is consistent with the GMA population projections promulgated by the state Office of Financial Management. This aspect is coupled with the fact that Richland has experienced a modest supply increase not matching with the increased demand for multifamily housing units. There are also increases in the percentage of households that rent; and

WHEREAS, the GMA now requires comprehensive plans to include a housing element that identifies a "sufficient capacity of land" to accommodate all projected housing needs during the 20-year planning period, and cities must include a detailed review of capacity among four categories: moderate, low, very low, and extremely low-income households (*see* RCW 36.70A.070(2)(c)); and

WHEREAS, the City of Richland's Responsible Official, acting in his capacity for the City which is the SEPA Lead Agency, issued a DNS on November 18, 2025, and there is a comment period for the action; and

WHEREAS, staff has studied the Land Capacity throughout the City's incorporation limits, as well as the additional Urban Growth Area which extends beyond the city limits, and determined that three (3) changes should be made at this time to the UGA:

1. **Removal** of approximately 140 acres of undeveloped land containing environmentally critical areas on Badger Mountain. The land is owned by Benton County and is designated as "Natural Open Space" on the City's Land Use Map, and the property is a part of the "Badger Mountain Centennial Preserve."

2. **Addition** of approximately 213 acres to the UGA for inclusion of the existing "Harvest Ridge" subdivision, which has been constructed to urban densities, inclusion of additional compact, urban residential development at the Harvest Ridge location; which includes land that has been preliminary platted and is entitled to develop as a Benton County subdivision in accordance with Preliminary Plat approval for 101 housing units which was granted in the summer of 2022 and the inclusion of approximately 45.5 acres of land owned by the Kennewick School District. The site is between the "Badger Mountain South" Master Planned Development and is bounded on the south and west by I-82. Infrastructure investments have already been made in the immediate area and therefore roads, sewer, water, electrical services and other amenities can be extended onto the site to accommodate urban-level residential development in a cost-effective and compact matter, furthering many GMA goals. Inclusion of this area into City's UGA can be considered a jurisdictional change in that the County has already approved residential development at the site and recent changes to the Growth Management Act allow for schools to be serviced by public utilities when located outside of an Urban Growth Area.

3. **Addition** of approximately 190 acres of land for non-residential purposes on a portion of a parcel lying generally east of I-82 and bounded on the west by Dallas Road, which lies immediately north of the Badger Mountain South Master Planned Development. The City has a *"bird in hand"* opportunity for Commercial Recreation development at the site, which can support local job creation, boost the tax base, and provide services and opportunities not presently available in the community. This will also convert land which is presently zoned as RL-5 (and therefore could accommodate approximately 38 units, which would generally be developed in a "sprawling" manner) to a higher and better use within the city; and

WHEREAS, none of the lands have ever been classified as Agricultural Land of Long-Term Commercial Significance (ALLTCS), and the proposed adjustments will result in a continuous UGA; and

WHEREAS, the Richland City Council finds it prudent to submit an application to Benton County for a UGA modification for consideration by Benton County.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Richland that the City Manager is authorized to submit an application to Benton County for the proposed 2026 UGA modifications, including the Capital Facilities Plan for this area, as reflected herein.

BE IT FURTHER RESOLVED that this Resolution shall take effect immediately.

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Docusign Envelope ID: 372C7238-7657-4259-A181-668585D90E3E

ADOPTED by the City Council of the City of Richland, Washington, at a regular meeting on the 18th day of November, 2025.

Theresa A Richardson
Theresa Richardson, Mayor

Attest:

Jennifer Rogers
Jennifer Rogers, City Clerk

Approved as to Form:

Heather Kintzley
Heather Kintzley, City Attorney

RECEIVED
NOV 26 2025
Benton County
Planning Division

File No. PLN-T1-2025-00378

CITY OF RICHLAND
Determination of Non-Significance

Description of Proposal: The City of Richland is proposing to adjust the boundaries of the Urban Growth Area (UGA) during the City's Comprehensive Plan Periodic Update. The City proposes the

- Removal of approximately 140 acres of undeveloped land owned by Benton County, which is part of the Badger Mountain Centennial Preserve, Assessor's parcel number (APN) 128984000000000 and a portion of APN 128982000002002.
- Addition of approximately 190 acres of land in agricultural production owned by Frank Tiegs LLC addressed as 12702 N Dallas Road, located on the east side of Dallas Road, which is the westerly portion of APN 129982012465001.
- Addition of approximately 254 acres of land east of I-82, west of Southgate Way, and North of Reata Road, comprising the Harvest Ridge Subdivision, APNs 105881010001000 and 105881010000001 - 105881010000042, and APN 105884020000053 owned by the Kennewick School District.

Proponent:
City of Richland
625 Swift Blvd
Richland, WA 99352

Location of Proposal: This UGA amendment would affect the following locations within Benton County:

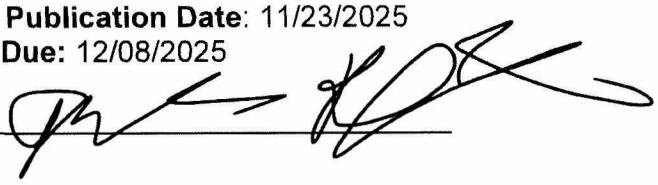
- Approximately 190 acres of APN 129982012465001 in the W½ of Section 29 Township 9N Range 28 EWM, addressed as 12702 N Dallas Road, Richland.
- APN 128984000000000, approximately 97 acres, located in the S½ of SE¼ and the S½ of the NW ¼ of the SE ¼ of Section 28 Township 9N Range 28 EWM.
- Approximately 43 acres of APN 128982000002002, located in the NE¼ of SE¼ and the S½ of the SE¼ of the NE ¼ of Section 28 Township 9N Range 28 EWM.
- The Harvest Ridge Subdivision, APNs 105881010001000 and 105881010000001 – 105881010000042, located in N½ of Section 5 Township 8N Range 28 EWM, addressed off of Harvest Ridge Loop, Haystack St, Ambrosia St, and Grange St, Kennewick.
- APN 105884020000053, located in Section 5 Township 8N Range 28 EWM.

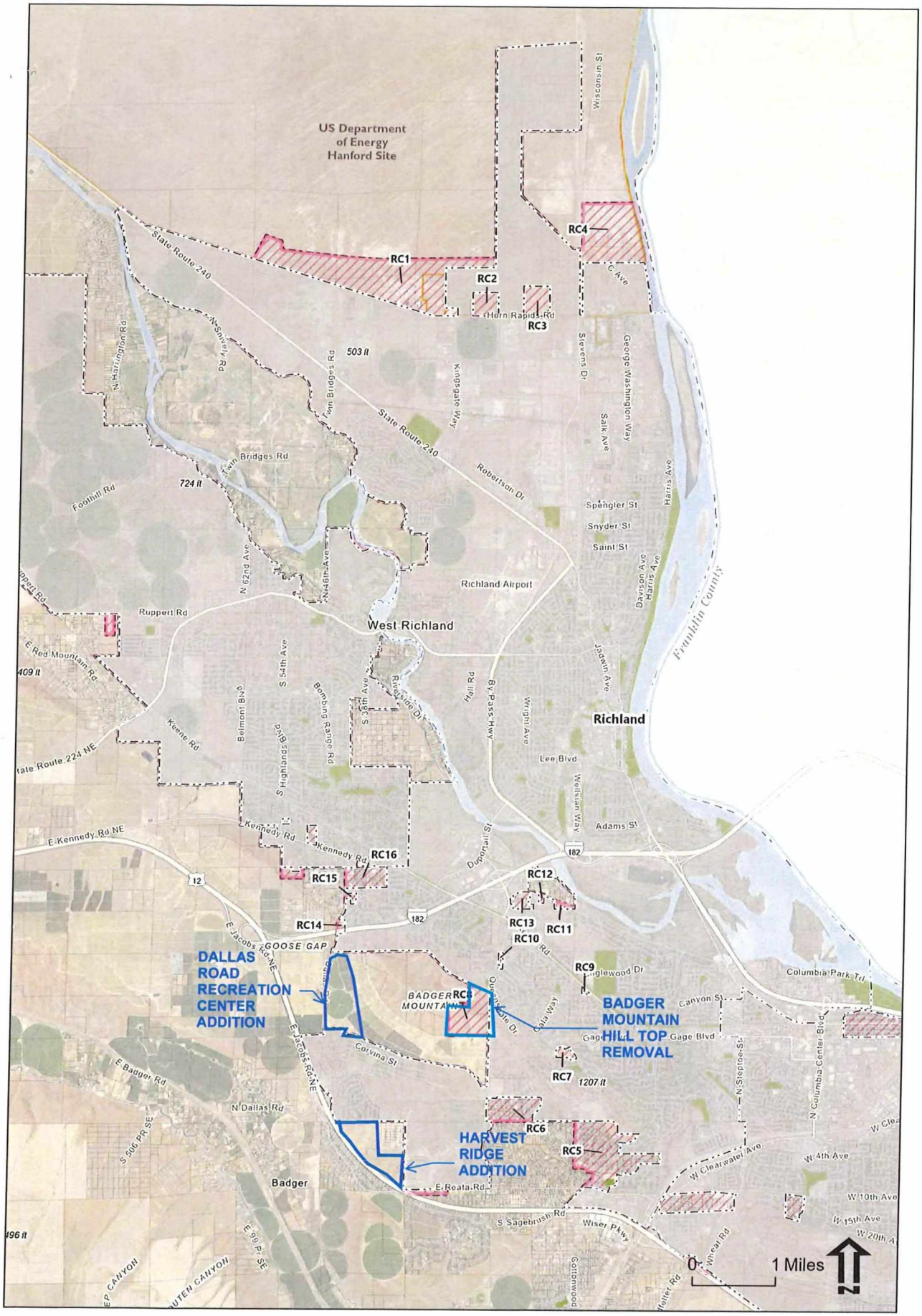
Lead Agency: City of Richland

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

( ) There is no comment period for the DNS.
(**X**) This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for fourteen days from the date of issuance.
( ) This DNS is issued after using the optional DNS process in WAC 197-11-355. There is no further comment period on the DNS.

Responsible Official: Mike Rizzitiello
Position/Title: Development Services Director
Address: 625 Swift Blvd., MS #35, Richland, WA 99352
Date: 11/19/2025
Newspaper Publication Date: 11/23/2025
Comments Due: 12/08/2025

Signature 



Parcels
Urban Growth Areas
City Limits

Richland UGA Inventory

Benton County Comprehensive Plan Update

Urban Growth Area (UGA) Inventory Spreadsheet
Required With an Application From a City to Amend the UGA Boundary.

The following information is required per Section 6 (C), (4), of Ordinance 465 and must be completed and submitted with an application to amend an Urban Growth Boundary:

A. General information for the City of Richland - *Prepared November 2025*

1) Total acres that are within the City's existing UGA boundary[1]: 28,239
(31,146 acres if including water)

a) Total acres that are incorporated lands 26,700

Acres vacant[2] 5,402
(This includes lands in agriculture production)
Acres underdeveloped[3] 3,472

b) Total acres that are not incorporated (UGA). 1,539

Acres vacant 58
Acres underdeveloped 432

2) Total Number of dwelling units (DU's) that are inside the UGA boundary 28,509 DU's.

a) Dwelling Unit inventory within city limits by housing type:

Single-family 20,177 units
Multi-family including duplex 7,789 units

3) Average household (HH) size within the City (latest OFM data) * persons/HH
**Per OFM there are 2.322 persons per housing unit in 2025 for Richland; HH size is not addressed*

4) Within UGA boundary: Federal acres 3,507 State acres 7,704
(we included "divisions of state: eg., school districts, Benton County, Ports)

B. OFM's Existing and Future Projected (20 year) Population

1) The estimated existing population that is inside the existing City's UGA boundary in the current year 2025 is: 65,234 persons.

2) The projected additional population that will be added to the City during the next 20 years (to 2046) per consultation between the cities and Benton County, and based upon the official projections from the State Office of Financial Management is: 26,656 persons.

3) The current population and the additional "20-year" projected population equals: 91,890 persons.

C. Existing Land Use Categories in the City

In Table 1 below, provide the total acreages for the land uses listed in the left-hand column that are shown (designated) on the Land Use Map of the City's Comprehensive Plan. Except where noted otherwise, include pre-designated or pre-zoned acres in the existing UGA (i.e., land areas within the existing UGA that are not yet annexed but are pre-zoned or pre-designated by the City).

TABLE 1: ACRES PER CAPITA OF EXISTING LAND USE CATEGORIES[4]

Land Use Categories (Comp Plan land use Map)	Existing Acres		
	Developed	Acres per-capita[5]	Vacant[a] & Underdeveloped[b]
Residential (Incorporated)	5,889	.090	1,212
Residential (UGA-Unincorporated)	432		58
Public Park/Recreation	2,029	.031	191
Public facilities Lands [6]	223	.003	50
Schools[7]	370	.006	193
Commercial	1,108	.017	684
Industrial	3,556	.055	4,089
BMS Subarea + "Other" Agriculture, Urban Reserve are "Other"	1,358	.021	1,387
Open space[8]		.037	
Public Service Lands (incorporated)[9]		.086	
Sub-Total	**14,968**	**.345**	**7,864**
Subtract Critical Area Acres (RCW 36.70A.060)			– 378
Total	**14,968**	**.345**	**7,486**

Vacant & Underdeveloped excludes BMS open space and school sites *(which were counted with those categories for accurate per capita calculation)*

D. For All Lands Within Its Urban Growth Boundary, Identify The City's 20- Year Acres per Capita Goal, for Each Land Use Category

In Table 2 below, identify the acres per capita of land use the city wishes to have at the end of the 20-year planning horizon.

TABLE 2: **ACRES PER CAPITA GOAL** AT END OF 20 YEARS

Land Use Category	Acres per-capita goal in 20 years
Residential	.080 (Av.)
Public Park/Recreation	.024
Public Facilities/Lands	.003
Schools	.008

Commercial	.017
Industrial	.039
Open space	.037
Public Service Lands	.086
Critical Areas (RCW 36.70A.060)	
Total Acres/Per Capita Goal for all Land Use Categories	**.292**

E. Inventory-Counting the Existing Available Land Supply, what Additional Acreage is Needed to Meet the Official 20-year Growth Projection?

Using the acre/per capita Goal identified in Table 2 for each land use category, determine the surplus or shortfall of the existing vacant and undeveloped land supply to meet the additional new 20 year population projection.

TABLE 3: ABILITY OF THE EXISTING VACANT AND UNDERDEVELOPED LAND SUPPLY TO ACCOMMODATE THE PROJECTED ADDITIONAL POPULATION FOR THE NEXT 20 YEARS

Land Use Category	Acres Needed to Accommodate 20-yr Projection[10]	Existing Vacant/ Undeveloped" Acres	Acres in excess of Need (+) Acres short of Need (-)
Residential (Incorporated)	2,132	1,212	
Residential (existing UGA only)		58	
Total Residential	2,132	1,270	-862
Public Park/Recreation	640	191	-448
Public Facilities/Lands	80	50	-30
Schools	213	193	-20
Commercial	453	684	+230
Industrial	1,039	4,089	+3,049
Open space	986	N/A	986
Public Service Lands[12]	2,292	N/A	2,292
BMS Subarea + "Other" Lands - to be reassigned		1,387	
DEDUCT Critical Areas Land (RCW 36.70A.060)		-378	
TOTAL BY COLUMN	7,836	7,486	
TOTAL ACRES (+ or -)	-351		
TOTAL ACRES NEEDED TO ACCOMMODATE 20 YEAR POPULATION GROWTH	*An increase of approx. **350** acres is needed*		

[a] Vacant are parcels without structures

[b] Underdeveloped are parcels partially developed to the allowable density/intensity but upon which at least 30 percent more additional density /coverage can occur per the applicable zoning district.

[1] The UGA Boundary includes both the city limits and urban growth area.

[2] Vacant are parcels without structures.

[3] Under-developed are parcels partially developed to the allowable density/intensity but upon which at least 30 percent more additional density/coverage can occur per the applicable zoning district.

[4] Categories per Countywide Planning Policy#4.

[5] Acres per capita = total acres of each land use category divided by the current population (e.g., 2800 ac. divided by 36,000 people = 0.077 acres/per cap.)

[6] Fire stations, jails, utility lands and corridors and easements, government administrative

[7] State Local and private schools.

[8] Open Space is other than public parks and recreation, e.g., golf courses, natural areas, etc.

[9] Existing for transportation network, i.e., road ROWs deducted from gross acreage of land use designations that they are within.

[10] Acres per capita x additional population added in 20 years = acres needed

[11] From Table 1.

[12] This is a percentage of the total acres needed for all land use categories for the road/circulation network.

Appendix D2
Benton City UGA Amendment Application

Community Development Department
102206 East Wiser Parkway
Kennewick, WA 9933

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

BENTON COUNTY PLANNING DIVISION APPLICATION
COMPREHENSIVE PLAN-URBAN GROWTH AREA AMENDMENT

RECEIVED
JAN 28 2026
Benton County
Planning Division

CPA File No. 2026-002

NAME OF CITY: Benton City

MAILING ADDRESS: 1009 Dale Ave. Suite A, Benton City WA 99320

CONTACT PERSON: Steve Zetz

EMAIL ADDRESS: szetz@ci.benton-city.wa.us

TELEPHONE: 509-588-3322

Please answer the following questions, if more space is needed please use attachments.

1. Addresses, parcel numbers and legal description of properties proposed for inclusion in the UGA: (add additional pages if necessary)

Area 1 Benton County Parcel Numbers 112964000005000, 112964000006000, 112964000010000, 112964000011000, 112964011346004, 112964011346003, 112964011346002, 112964011346001, 112964000009000, 112964000008000,
Area 2 Benton County Parcel Numbers 113964011991001, 113964011991002
See attached Legal Descriptions.

2. Prepare and attach a site map and aerial photo showing the proposed area in which a UGA amendment is being sought. Please show clearly the following: the proposed UGA boundary, current corporate boundaries, major physical boundaries; both natural and man-made (i. e., including but not limited to highways, railroads, rivers, streams, power lines, schools, and other public outbuildings, critical areas, open space, etc.), the proposed land use designations, pattern and acreages of urban land uses and densities for the area proposed for inclusion, with any residential areas requiring a minimum average density of six (6) dwelling units per acre, the general location and acreage of planned open spaces and greenbelts that will remain as open space within the area(s) proposed for inclusion within a UGA, as per RCW 36.70A.110(2);section, map scale, north arrow, township and range lines, and date of preparation, are to be shown and identified. If in a shoreline area, define existing shorelines area as shown in existing shorelines master plan and indicate the existing environment designation.

3. **What is the current use of the property proposed for inclusion in the UGA:**

Area 1 is undeveloped land with no assigned uses.

Area 2 containes 21.04 acres of State land currently used as a park, maintained and operated by Benton City. An additional 3.53. acres containes one single family dwelling unit.

4. What is the existing comprehensive plan designation for the area in which the property proposed for inclusion in the UGA:

The proposed area for inclusion has the following deisgnations according to the Benton County Planning Department GIS system. Area 1 - Rural Remote. Area 2- 21.04 acres Public, and 3.53 acres Rural Remote.

5. What is the City's proposed land use designation of the property proposed for inclusion in the UGA:

Area 1- Residential

Area 2- 21.04 acres of Parks, and 3.53 acres Residential (becuase of the proximity to the Yakima River and recent updates to the FEMA mapping it is likely that this residential designation may change to ensure compliance with FEMA guidelines.

6. What are the reasons for the requested amendment and include substantial information why the provisions, map designations, etc., of the adopted plan are not sufficient to satisfy the concern that gives rise to the amendment request:

Area 1- Is currently bordered on two sides by City limits and a third side is currently within the UGA. Recent changes to the flood map have significantly altered the Residential capacity of Benton City. In addition the growth in this area necessitates the need for devleopment in this area to occur at urban densities. Proximity to existing schools and infastructure makes this area an island that without the potential for annexation would likly result in development that is incompatible or inconsistent with urban standards and densities.

Area 2 - Is essentially a housekeeping item that allows the City to annex State land that is currently maintained by Benton City and used as a park. The residential piece is unlikley to ever develop further and is included in order to prevent an irregular boundary.

7. Include any other substantiated information that you feel is necessary or relevant for consideration: Recent changes to the FEMA flood maps have significantly reduced residential capacity. It is unknown at this time to what extent capacity has been reduced. During the Comprehensive Plan Update a new analysis will be required as well as alterations to all planning documents to include Capital Facilities. This UGA expansion request is likley insufficient to address the capacity reduction, however it does provide additional lands that are not encumbered by critical areas and can be more easily served by City services.

Mayor Signature	Printed Name	Date
Authorized City Representative	Printed Name	Date

ANY INFORMATION SUBMITTED TO THE BENTON COUNTY PLANNING DIVISION IS SUBJECT TO PUBLIC RECORDS DISCLOSURE LAW FOR THE STATE OF WASHINGTON (RCW CHAPTER 42.17) AND ALL OTHER APPLICABLE LAW THAT MAY REQUIRE THE RELEASE OF THE DOCUMENTS TO THE PUBLIC.

An application fee of $2000.00 must be submitted with this application. This fee is non- refundable. Please make check payable to Benton County Treasurer.

APPLICANT'S CHECKLIST FOR COMPLETENESS

- ☐ APPLICATION FORM COMPLETED AND SIGNED WITH REQUIRED FEES
- ☐ CITY COUNCIL ADOPTED UGA RESOLUTION
- ☐ MAPS AND AERIAL PHOTOS WITH REQUIRED INFORMATION
- ☐ UGA INFORMATION SPREADSHEET
- ☐ CITIES SEPA CHECKLIST, DETERMINATION, OR EIS IF REQUIRED
- ☐ CAPITAL FACILITIES PLAN AS REQUIRED BY RCW 36.70A.070(3) & RCW 36.70A.03

RESOLUTION NO. 2026-05

A RESOLUTION OF THE CITY OF BENTON CITY, WASHINGTON, REQUESTING BENTON COUNTY TO INITIATE THE FORMAL PROCESS FOR AN AMENDMENT TO THE URBAN GROWTH AREA BOUNDARY TO INCORPORATE APPROXIMATELY 58.18 ACRES OF LAND; AND FURTHER AUTHORIZING THE MAYOR TO EXECUTE AND SUBMIT ALL RELATED DOCUMENTS.

WHEREAS, the State of Washington's Growth Management Act (GMA) requires counties, in cooperation with cities, to designate an Urban Growth Area (UGA) sufficient to accommodate projected urban growth for a 20-year planning horizon; and

WHEREAS, the GMA further mandates that urban growth be encouraged within the UGA and discouraged outside of it, to promote orderly development and the efficient provision of public services; and

WHEREAS, a recent review of the existing UGA confirms that the proposed AREA 1 is bordered on 3 sides by Benton City, a map of which is attached hereto as **Exhibit A**, and that development of this property to County standards will have an adverse impact to the urban densities and development of the abutting incorporated city limits; and

WHEREAS, the area proposed for inclusion, legally described as AREA 2, is contiguous to the existing UGA boundary and is identified as the most logical and cost-effective area to provide necessary urban services, including sewer, water, transportation; and

WHEREAS, recent changes to Benton City's Floodplain and Floodway have reduced and altered the buildability of a significant amount of acreage along the Yakima River corridor; and

WHEREAS, Benton City has a duty to ensure that development occurs in areas suitable for urban densities; and

WHEREAS, the property described in AREA 2 consists of land currently owned by the State of Washington and is maintained under agreement by Benton City; and

WHEREAS, the proposed expansion is consistent with the Benton County County-Wide Planning Policies and serves an overriding public interest by protecting public health, safety, and welfare and enabling the locally adopted Comprehensive Plan to meet the goals of the State GMA; and

WHEREAS, the Benton City Planning Commission conducted a Public Hearing on January 12, 2026, and a recommendation to approve the expansion was made, see Findings of Fact attached hereto as **Exhibit B**; and

WHEREAS, the Benton City Council conducted a Public Hearing on January 20, 2026; and

WHEREAS, the Benton City Council has conducted due environmental review pursuant to the State Environmental Policy Act (SEPA) requirements, and relevant findings are incorporated herein.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF BENTON CITY, WASHINGTON, hereby resolves as follows:

That the Benton City Council hereby formally requests Benton County / County Commissioners to initiate the formal process for an amendment to the Urban Growth Area boundary.

Be It Further Resolved that the proposed expansion area, specifically identified in the attached exhibits, shall be added to the official Urban Growth Area map to provide for an adequate 20-year supply of developable land and to ensure its development to Urban standards.

Be It Further Resolved that the Mayor is hereby authorized and directed to execute and submit all necessary land use applications and related documents to effectuate this UGA expansion request, and to work cooperatively with county staff and the public throughout the review process.

Be It Further Resolved that this Resolution shall take effect immediately upon passage by City Council.

ADOPTED this 20th day of January, 2026, by the City Council of the City of Benton City, Washington, and signed in authentication of its passage this 20th day of January, 2026.

Resolution No. 2026-05 filed and recorded in the office of the City Clerk of the City of Benton City, Washington, this 20th day of January, 2026.

Len Burton, Mayor

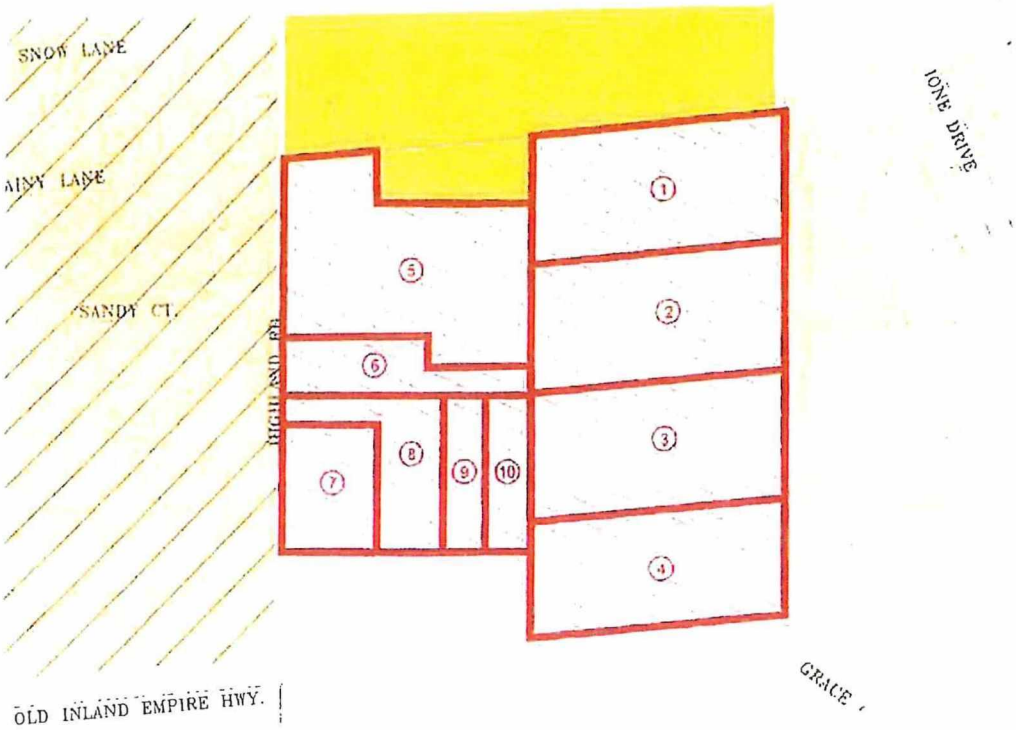
Attest:

Carla Meyer
City Clerk/Treasurer

Approved as to Form:

Kerr Ferguson Law, PLLC
City Attorneys

EXHIBIT A



PROPERTY DESCRIPTIONS

ALL PROPERTIES COUNTY ZONING: RL-5
PROPOSED CITY LAND USE: RESIDENTIAL

1. OLSEN FAMILY LLC
   112964000005000
   5.03 ACRES
2. OLSEN FAMILY LLC
   112964000006000
   5.03 ACRES
3. OLSEN FAMILY LLC
   112964000010000
   5.03 ACRES
4. OLSEN FAMILY LLC
   112964000011000
   4.52 ACRES
5. DWS ORCHARDS LLC
   112964000008000
   6.23 ACRES
6. DWS ORCHARDS LLC
   112964000009000
   1.95 ACRES
7. DWS ORCHARDS LLC
   112964011346001
   1.85 ACRES
8. DWS ORCHARDS LLC
   112964011346002
   1.97 ACRES
9. DWS ORCHARDS LLC
   112964011346003
   1.00 ACRES
10. DWS ORCHARDS LLC
    112964011346004
    1.00 ACRES

DETAIL 1

NORTH

AKANA

4. What is the existing comprehensive plan designation for the area in which the property proposed for inclusion in the UGA:

The proposed area for inclusion has the following deisgnations according to the Benton County Planning Department GIS system. Area 1 - Rural Remote. Area 2- 21.04 acres Public, and 3.53 acres Rural Remote.

5. What is the City's proposed land use designation of the property proposed for inclusion in the UGA:

Area 1- Residential

Area 2- 21.04 acres of Parks, and 3.53 acres Residential (becuase of the proximity to the Yakima River and recent updates to the FEMA mapping it is likely that this residential designation may change to ensure compliance with FEMA guidelines.

6. What are the reasons for the requested amendment and include substantial information why the provisions, map designations, etc., of the adopted plan are not sufficient to satisfy the concern that gives rise to the amendment request:

Area 1- Is currently bordered on two sides by City limits and a third side is currently within the UGA. Recent changes to the flood map have significantly altered the Residential capacity of Benton City. In addition the growth in this area necessitates the need for devleopment in this area to occur at urban densities. Proximity to existing schools and infastructure makes this area an island that without the potential for annexation would likly result in development that is incompatible or inconsistent with urban standards and densities.

Area 2 - Is essentially a housekeeping item that allows the City to annex State land that is currently maintained by Benton City and used as a park. The residential piece is unlikley to ever develop further and is included in order to prevent an irregular boundary.

7. Include any other substantiated information that you feel is necessary or relevant for consideration: Recent changes to the FEMA flood maps have significantly reduced residential capacity. It is unknown at this time to what extent capacity has been reduced. During the Comprehensive Plan Update a new analysis will be required as well as alterations to all planning documents to include Capital Facilities. This UGA expansion request is likley insufficient to address the capacity reduction, however it does provide additional lands that are not encumbered by critical areas and can be more easily served by City services.

Mayor Signature	Len Burton	1-30-26
	Printed Name	Date

Authorized City Representative	Stephen Zelz	1-26-2026
	Printed Name	Date

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An application fee of $2000.00 must be submitted with this application. This fee is non- refundable. Please make check payable to Benton County Treasurer.

BENTON CITY
24-002-23

LAND CAPACITY ANALYSIS

11/4/25

Based on Benton County's Uniform Formula in Policy #4 of the County Wide Planning Policy

2025 Population Estiamte	4,418
2045 Population Estimate	5,517

	Land Use	Total Acres	Developed Acres AC	Underutilized/ Vacant AC	Current per Capita Value AC/person	Needed Area for 2045 Population AC
A	**Residential**	904.85	816.10	88.75	0.1847	1,019.11
	R2	789.22	717.94	71.28	0.1625	896.54
	R3	77.25	66.37	10.89	0.0150	82.88
	R3M	38.37	31.79	6.58	0.0072	39.69
A-1	**AS**	210.60	210.60	0.00	0.0000	
B	**Parks**	35.51	35.51	0.00	0.0080	44.34
C	**City**	40.04	40.04	0.00	0.0091	50.00
D	**Schools**	52.27	52.27	0.00	0.0118	65.27
E	**Commerical**	69.21	51.21	17.99	0.0116	63.95
F	**Industrial**	385.94	107.89	278.05	0.0244	134.73
G	**Open Space**	0	0	0.00	0.0000	0.00
H	**Right-of-Ways**		138.18		0.0313	172.56
I	**70% Build Out Residential of 904.85 ac**		633.39		0.1434	790.95
	A-I Total				0.4243	**2,340.91**
J	25% A-I Total				0.5304	2,926.14
K	Critical Area Credit		80.88		0.0183	100.99
	TOTAL ADJUSTED(J-K)				0.5121	**2,825.14**
		1698.42	2129.72			

Total City Acreage	1698.42
Total UGA Acreage	399.90

Needed Area for 2045	**2,825.14**	**ac**
Total City & UGA Land	**2,098.32**	**ac**
Additional Land Requirement	**726.82**	**ac**

NOTES

1 Population Estimate from City Population Estimate based on OFM Population Projections and Benton City considered to be 2% of Benton County's total population. Estimates from 2025 and 2045 are used in the Land Capaicy Analysis.

2 AS (Ag-Suburban) is considered fully developed as most of this is in the flood plain and no large developments will occur in this zoning. Therefore it is not considered for additional land as it will skew the acual results. It however, included in the Total City & UGA Land.

3 Open Space (Item G) is considered to be within the parks and school land areas and shows a "0" in the

4 Needed Area for 2045 = 2045 Population x Total Adjusted per capita land use value of 0.5121 ac/person

53.28%	48%				
46.47%	42%				
4.55%	4%				
2.26%	2%				
12.40%	12%				
2.09%	2%		8.037573563		
2.36%	2%				
3.08%	3%	8%			
4.07%	3%				
22.72%	6%				
0.00%	0%				
0.00%	8%				
0.00%	37%				
0.00%	0%				
0.00%	0%				
0.00%	5%			County underdeveloped	45
0.00%				County Total	399.9
				% County Developed	0.887472
1,550					
				City underdeveloped	88.75
				city Developed	2129.72
				City Total	1698.42
				% City Developed	1.253941

BENTON CITY

LAND USE MAP

JANUARY 12, 2026

PROPOSED UGA EXPANSION

AREA 1
33.61 ACRES
SEE DETAIL 1,
SHEET 2

AREA 2
21.04 ACRES
SEE DETAIL 2,
SHEET 3

NORTH

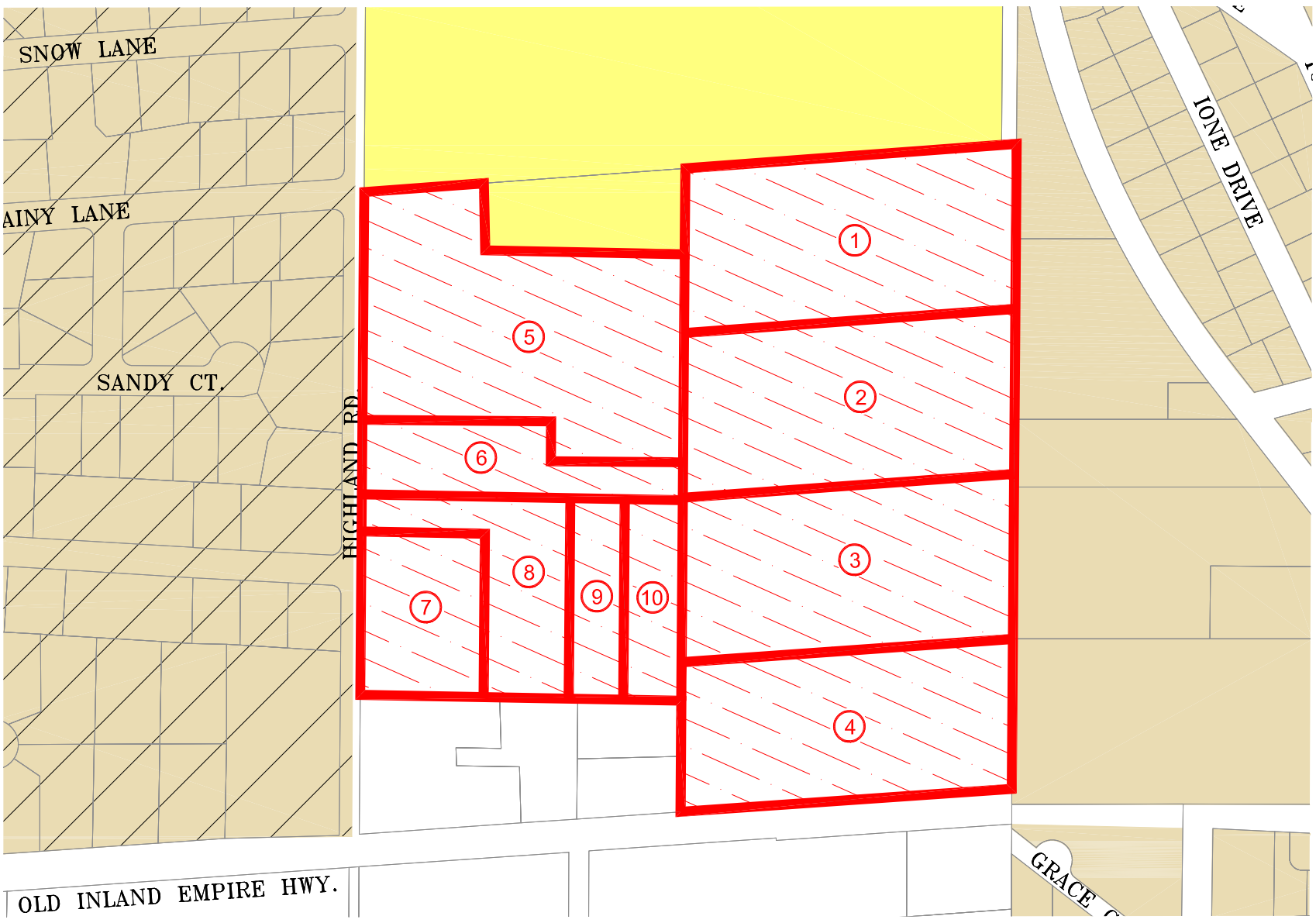
0 500 1000 1500

SCALE IN FEET

LEGEND

- CITY LIMITS
- RESIDENTIAL
- AGRICULTURE SUBURBAN
- COMMERCIAL
- MANUFACTURING/LIGHT INDUSTRIAL
- GOVERNMENT
- RIVER
- PARKS
- FLOODWAY
- EXISTING UGA
- PROPOSED UGA

AKANA
Plan + Design + Engineer + Manage
2815 Saint Andrews Loop, Ste B
Pasco, WA 99301
Voice (503) 652-9090



PROPERTY DESCRIPTIONS

ALL PROPERTIES COUNTY ZONING: RL-5
PROPOSED CITY LAND USE: RESIDENTIAL

1. OLSEN FAMILY LLC
   112964000005000
   5.03 ACRES
2. OLSEN FAMILY LLC
   112964000006000
   5.03 ACRES
3. OLSEN FAMILY LLC
   112964000010000
   5.03 ACRES
4. OLSEN FAMILY LLC
   112964000011000
   4.52 ACRES
5. DWS ORCHARDS LLC
   112964000008000
   6.23 ACRES
6. DWS ORCHARDS LLC
   112964000009000
   1.95 ACRES
7. DWS ORCHARDS LLC
   112964011346001
   1.85 ACRES
8. DWS ORCHARDS LLC
   112964011346002
   1.97 ACRES
9. DWS ORCHARDS LLC
   112964011346003
   1.00 ACRES
10. DWS ORCHARDS LLC
    112964011346004
    1.00 ACRES

DETAIL 1

NORTH

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PROPERTY DESCRIPTIONS

DETAIL 2

NORTH

(11) GOODE LLOYD L
113964011991001
3.53 ACRES
CURRENT COUNTY ZONING: RL-5
PROPOSED CITY LAND USE: RESIDENTIAL

(12) DEPARTMENT OF WILDLIFE
113964011991002
15.70 ACRES
CURRENT COUNTY ZONING: PARKS
PROPOSED CITY LAND USE: PARKS

(13) KIONA IRRIGATION DISTRICT RIGHT OF WAY
≈1.81 ACRES
CURRENT COUNTY ZONING: RL-5
PROPOSED CITY LAND USE: PARKS

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DETERMINATION OF NON-SIGNFICANCE

1. **Date of Issuance:** December 19, 2025
2. **Lead Agency:** City of Benton City
3. **Staff Contact:** Paula Kauer, Finance Manager 1009-A Dale Ave, Benton City WA 99320 Telephone 509-588-3322
4. **Name of Proposal:** Comprehensive Plan & UGA Amendment

Description of Proposal: The proposal is a non-project action that includes amendments to specific areas of the Benton City Comprehensive Plan text and UGA Map per RCW 36.70A.070 (3), RCW 36.70A.110(1)&(3), RCW 36.070A.020(1) & (2), relevant Beton County Countywide Planning Policies (CWPP). The latest Comprehensive Plan was adopted in 2021.

Location of Proposal: City-wide and at various locations in the City. See SEPA checklist for specific locations.

Findings:

1. The City finds that the non-project action will not results in adverse impacts to the environment.
2. The City further finds that future development that may occur in the locations where map changes may occur will be subject to compliance with the Benton City Municipal Code, SEPA and other applicable regulations that will ensure mitigation of any potential adverse impacts to the environment.

Mitigation Measures: None

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

☒ This DNS is issued under WAC 197-11-340 and the lead agency will not act on this proposal for 14 days from the date of issuance listed above.

Responsible Official	Len Burton
Position/Title	Mayor
Address:	1009-A Dale Ave, Benton City WA 99320
Phone:	509-588-3322
Signature:	

Appeal: Any agency or person may appeal the lead agency's environmental determination per BCMC 16.02.170. Appeals of this decision are accepted until 4:00 pm, January 9th, 2026.

SEPA[1] Environmental Checklist: BENTON CITY UGA

Purpose of checklist

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization, or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. **You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown.** You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to **all parts of your proposal**, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for lead agencies

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B, plus the Supplemental Sheet for Nonproject Actions (Part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in "Part B: Environmental Elements" that do not contribute meaningfully to the analysis of the proposal.

A.Background

Find help answering background questions[2]

1. **Name of proposed project, if applicable:**

   2026 Comprehensive Plan Update and Urban Growth Area (UGA)Revision

2. **Name of applicant:**

   Benton City

3. **Address and phone number of applicant and contact person:**

   Carla Meyer, City Clerk/Treasurer
   City of Benton City
   PO Box 70-1009 Dale Ave, Suite A
   Benton City, WA 99320
   (509) 588-3322

   Contact Person: Alan Rainey, PE
   Akana
   2815 Saint Andrews Loop, Suite B
   Pasco, WA 99301
   (971)328-3007

4. **Date checklist prepared:**

   November 14, 2025 by Alan Rainey of Akana

5. **Agency requesting checklist:**

   Benton City

6. **Proposed timing of schedule (including phasing, if applicable):**

   Adoption of the 2026 Comprehensive Plan Update and UGA Revision is expected to be complete by September 30, 2026.

7. **Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.**

   Yes, Revisions to UGA.

8. **List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.**

   This SEPA checklist.

9. **Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.**

   No.

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

    Benton County approval will be needed for any proposed Benton City UGA revisions.

11. **Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you**

to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

The proposal is a non-project action that includes amendments of specific areas of the Benton City Comprehensive Plan text and land use map as allowed once-per-year in accordance with WAC Chapter 365-196 and the Benton City Municipal Code, section 2.70.030(E). The Comprehensive Plan was last amended in 2020.

The proposal includes revisions to the Benton City UGA.

12. **Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.**

The proposed text amendments to the Comprehensive Plan apply generally to all properties located within the current limits of Benton City. The City is located in Benton County, in eastern Washington State, in the mid-Columbia Valley. The Yakima River flows along portions of the east and west borders of the city and through a southern section of the city. Interstate 82 divides the city with approximately one-third of the city south of the interstate.

Parcels not previously located within the Benton City UGA that are proposed for inclusion in the Benton City UGA are:

	PARCEL #	OWNER	SIZE
	HIGH SCHOOL AREA		(Acres)
1	112964000005000	Olsen Family LLC	5.03
2	112964000006000	Olsen Family LLC	5.03
3	112964000010000	Olsen Family LLC	5.03
4	112964000011000	Olsen Family LLC	4.52
5	112964000008000	DWS Orchards LLC	6.23
6	112964000009000	DWS Orchards LLC	1.95
7	112964011346001	DWS Orchards LLC	1.85
8	112964011346002	DWS Orchards LLC	1.97
9	112964011346003	DWS Orchards LLC	1.00
10	112964011346004	DWS Orchards LLC	1.00
	TOTAL		33.61
	RIVER AREA		
11	113964011991001	Goode Lloyd L	3.53
12	113964011991002	Dept. of Wildlife	15.70
13	Irrigation ROW	Kiona Benton (~ area)	1.81
	TOTAL		21.04

B. Environmental Elements

1. Earth

a. General description of the site:

Circle or highlight one: Flat, rolling, hilly, steep slopes, mountainous, other:

Many types of terrain, including flat, rolling, hilly, and steep slopes are found within Benton City.

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

Some areas of the City have slopes exceeding 15 percent.

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

Soils within Benton City are predominantly Starbuck-Scooteney-Rock outcrop with some Warden-Shano-Esquatzel type soils in the southern portion of the city.

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

No.

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

Not applicable.

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

Not applicable.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

Not applicable.

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

Through the application of the City's Critical Areas Ordinance and other regulations to reduce or control erosion during approved land development projects.

2. Air

a. **What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.**

Not applicable.

b. **Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.**

Not applicable.

c. **Proposed measures to reduce or control emissions or other impacts to air, if any:**

None proposed.

3. Water

a. Surface:

1. **Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.**

   The Yakima River flows along portions of the east and west borders of the city and through a southern section of the city.

2. **Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.**

   None proposed

3. **Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.**

   None proposed

4. **Will the proposal require surface water withdrawals or diversions? Give a general description, purpose, and approximate quantities if known.**

   None proposed

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

   Portions of the city lie in the 100-year floodplain and floodways. The proposed changes to the comprehensive plan apply generally to all properties located within the current limits of Benton City. A portion of Parcel 113964011991002 located

adjacent to 14th Street, directly adjacent to the Yakima River, is within the flood plain.

6. **Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.**

   No discharges. Future proposed projects will be individually reviewed for site-specific impacts.

b. Ground:

1. **Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give a general description, purpose, and approximate quantities if known.**

   None proposed. Future proposed projects will be individually reviewed for site-specific impacts.

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

   None proposed. Future proposed projects will be individually reviewed for site-specific impacts.

c. Water Runoff (including stormwater):

1. **Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.**

   None proposed. Future proposed projects will be individually reviewed for site-specific impacts.

2. **Could waste materials enter ground or surface waters? If so, generally describe.**

   Not applicable.

3. **Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.**

   Not applicable.

d. **Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:**

Not applicable. Compliance with the City's Critical Areas Ordinance, the SMP and other regulations are compulsory.

4. Plants

Find help answering plants questions

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

☒ **deciduous tree: alder, maple, aspen, other**

☒ **evergreen tree: fir, cedar, pine, other**

☒ **shrubs**

☒ **grass**

☒ **pasture**

☒ **crop or grain**

☒ **orchards, vineyards, or other permanent crops.**

☒ **wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other**

☐ **water plants: water lily, eelgrass, milfoil, other**

☒ **other types of vegetation**

b. **What kind and amount of vegetation will be removed or altered?**

None proposed. Future proposed projects will individually be reviewed for site-specific impacts.

c. **List threatened and endangered species known to be on or near the site.**

None applicable. Future proposed projects will be individually reviewed for site-specific impacts.

d. **Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.**

None proposed. Future proposed projects will be individually reviewed for site-specific impacts.

e. **List all noxious weeds and invasive species known to be on or near the site.**

Future proposed projects will be individually reviewed for site-specific impacts.

5. Animals

a. **List any birds and other animals that have been observed on or near the site or are known to be on or near the site.**

Examples include:

- **Birds: hawk, heron, eagle, songbirds, other:**
- **Mammals: deer, bear, elk, beaver, other:**
- **Fish: bass, salmon, trout, herring, shellfish, other:**

Nearly all the Above listed species have occasionally been observed in Benton City except bear, herring, and shellfish.

b. **List any threatened and endangered species known to be on or near the site.**

The Washington Department of Fish and Wildlife Priority Habitat and Species maps show the Townsend's Ground Squirrel and the Ferruginous hawk as Candidate and Threatened species, respectively, within the general area of Benton City. However, relative to listed species, future proposed projects will be individually reviewed for site-specific impacts.

c. **Is the site part of a migration route? If so, explain.**

Yes, the entire Columbia basin is located within known migratory routes for salmonids and migratory birds.

d. **Proposed measures to preserve or enhance wildlife, if any.**

Not applicable. Future proposed project will be individually reviewed for site-specific impacts as well as site-specific mitigation of determined impacts where mitigation is required. All projects will be required to comply with the City's Critical Areas Ordinance.

e. **List any invasive animal species known to be on or near the site.**

Not applicable. However, relative to listed species, future proposed projects will be individually reviewed for site-specific impacts and for compliance with the City's adopted Critical Areas Ordinance.

6. Energy and natural resources

a. **What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.**

Future proposed projects will be individually reviewed for site-specific impacts.

b. **Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.**

Not applicable.

c. **What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.**

Not applicable.

7. Environmental health

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

No.

1. **Describe any known or possible contamination at the site from present or past uses.**

   Not applicable. Future proposed projects will be individually reviewed for site-specific conditions.

2. **Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.**

   Not applicable.

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

   Not applicable.

4. **Describe special emergency services that might be required.**

   Not applicable.

5. **Proposed measures to reduce or control environmental health hazards, if any.**

   Not applicable.

b. Noise

1. **What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?**

   Not applicable. Future proposed projects will be individually reviewed for site-specific conditions.

2. **What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?**

The majority of the proposals involve changes from an existing land use or one to one that is residential and future development will not typically result in greater levels of noise than the previous designations would have generated.

3. **Proposed measures to reduce or control noise impacts, if any:**

   None proposed.

8. Land and shoreline use

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

   Parcel 113964011991002 is a park left in natural habitat. The City will maintain this property in natural habitat.

b. **Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?**

   None of the parcels involved in the proposals have been used as working farmlands or working forest lands.

   1. **Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?**

      No.

c. **Describe any structures on the site.**

   Structures are located on various parcels within the existing city limits and UGA and within the proposed areas to be added to the UGA.

d. Will any structures be demolished? If so, what?

None proposed at this time.

e. What is the current zoning classification of the site?

Zoning classifications vary throughout the proposals. See the Zoning Map.

f. What is the current comprehensive plan designation of the site?

Land use designations vary throughout the proposals. See the Land Use Map

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

There are several different shoreline master program shoreline environment designations throughout the City alone shorelines.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

A variety of sensitive areas have been designated throughout the City. These areas are typically related to shorelines, floodplains, steep slopes, wetlands, and miscellaneous habitat areas.

i. Approximately how many people would reside or work in the completed project?

Not applicable.

j. Approximately how many people would the completed project displace?

Not applicable.

k. Proposed measures to avoid or reduce displacement impacts, if any.

None proposed.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.

Application of policies and guidelines as established by the comprehensive plan.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

Application of policies and guidelines as established by the comprehensive plan.

9. Housing

a. **Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.**

None at this time.

b. **Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.**

None.

c. **Proposed measures to reduce or control housing impacts, if any:**

None proposed.

10. Aesthetics

a. **What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?**

Not applicable.

b. **What views in the immediate vicinity would be altered or obstructed?**

Not applicable.

c. **Proposed measures to reduce or control aesthetic impacts, if any:**

Not applicable.

11. Light and glare

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

Not applicable.

b. **Could light or glare from the finished project be a safety hazard or interfere with views?**

Not applicable.

c. **What existing off-site sources of light or glare may affect your proposal?**

Not applicable.

d. **Proposed measures to reduce or control light and glare impacts, if any:**

None proposed.

12. Recreation

a. **What designated and informal recreational opportunities are in the immediate vicinity?**

Not applicable.

b. **Would the proposed project displace any existing recreational uses? If so, describe.**

No.

c. **Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:**

None proposed.

13. Historic and cultural preservation

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

Not applicable.

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

Not applicable.

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

Not applicable.

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

None proposed.

14. Transportation

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

The existing City and County street systems serve the geographic area for the proposed UGA revisions. Future developments within the UGA will be evaluated for impacts to the existing street systems.

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

Benton City is served by Ben Franklin Transit.

c. **How many additional parking spaces would be the completed project or non-project have? How many would the project or proposal eliminate?**

None at this time.

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

Not applicable.

e. **Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.**

Not applicable.

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

Not applicable as this is a non-project action.

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

Not applicable.

h. **Proposed measures to reduce or control transportation impacts, if any:**

None proposed.

15. Public services

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

Not applicable as this is a non-project action.

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

None proposed.

16. Utilities

a. **Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:**

All utilities are available within Benton City, to various extents.

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

Not applicable as this is a non-project action.

C.Signature

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

X 

Type name of signee: Len Burton, Mayor

Position and agency/organization: Mayor, Benton City

Date submitted: December 19, 2025

D. Supplemental sheet for non-project actions

Do not use this section for project actions.

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

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

   As a non-project action, the proposal will not increase discharge to water; emissions to air, production, storage, or release of toxic or hazardous substances; or production of noise. Most of the proposed land use designation and zoning changes will not result in more intense development of the specific parcels however, some changes may facilitate additional dwelling units can contribute to increased emissions to air (typical of household uses) and production of noise (typical household uses).

   - **Proposed measures to avoid or reduce such increases are:**

     None proposed.

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

   As a non-project action, the proposal will not affect plants, animals, fish, or marine life. The changes under this proposal will not change any aspect of the city's protection of these items under the Critical Areas Ordinance.

   - **Proposed measures to protect or conserve plants, animals, fish, or marine life are:**

     None proposed. Further, all site-specific projects are required to comply with all local, state, and federal laws regarding the protection of endangered species.

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

   As a non-project action, the proposal will not deplete energy or natural resources. Potential development will increase demands for energy and natural resources regardless of the Comprehensive Plan amendments. Future proposed projects will be individually reviewed for site-specific impacts.

   - **Proposed measures to protect or conserve energy and natural resources are:**

     None proposed.

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

No direct impacts to environmentally sensitive areas or areas designated to government protection are expected as a result of the non-project action.

- **Proposed measures to protect such resources or to avoid or reduce impacts are:**

  Fish and Wildlife Habitat Conservation Areas are established and mapped to protect habitats for federal or state endangered, threatened, sensitive, candidate, and priority species of fish, wildlife or plants, following best available science. These areas are considered worth protecting not only for the health of fish and wildlife species but because the habitats themselves help improve water quality, increase soil health, and affect hydrology which results in a reduction of flooding. The City regulates development in or near these habitats.

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

   Any proposed use or development within the city is subject to the City's Comprehensive Plan and any proposed use or development within shoreline jurisdiction is also subject to the City's Shoreline Master Program.

   - **Proposed measures to avoid or reduce shoreline and land use impacts are:**

     None proposed.

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

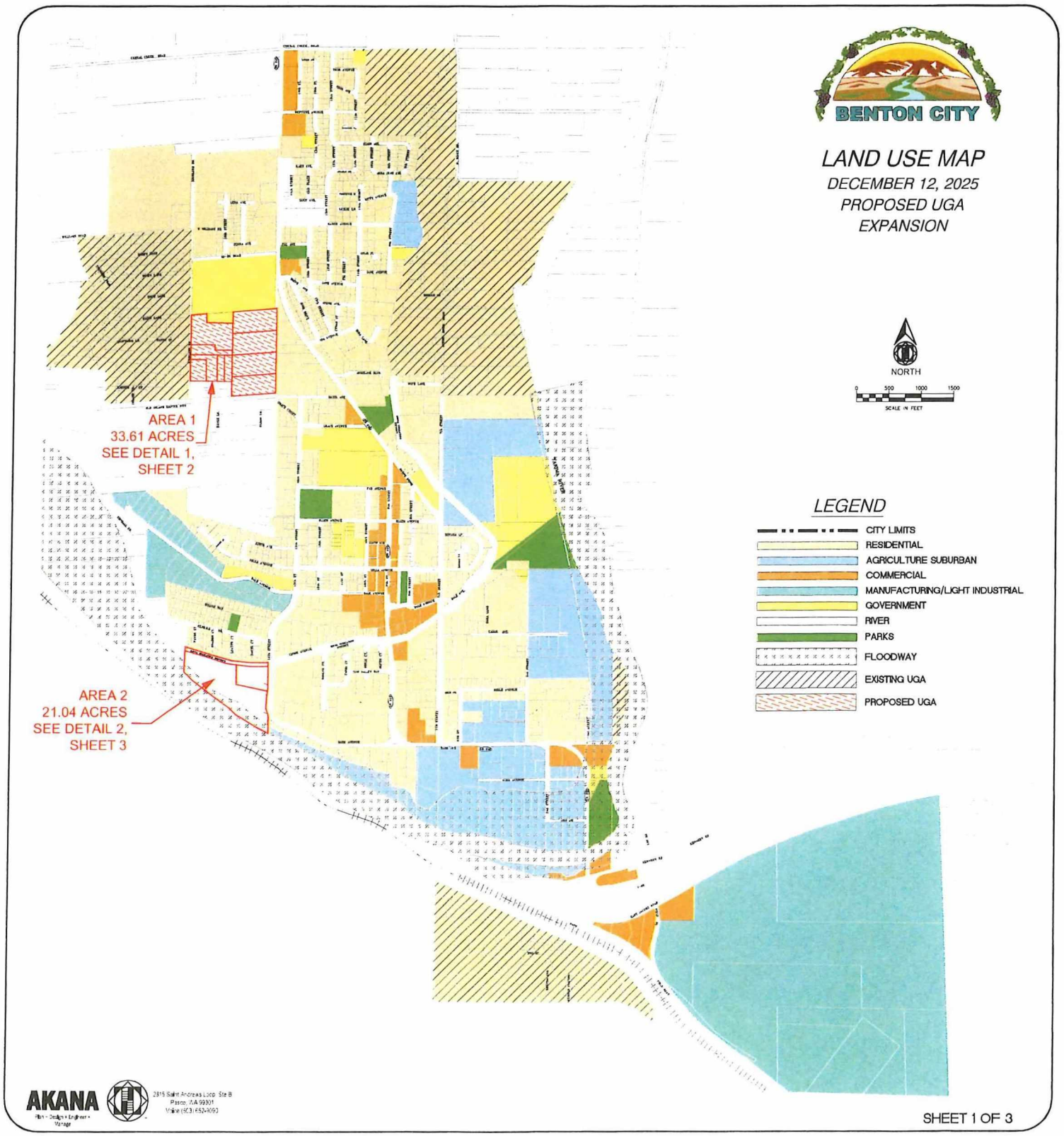
   As a non-project action, the amendments to the Comprehensive Plan will not directly increase demands on transportation or public services and utilities.

   - **Proposed measures to reduce or respond to such demand(s) are:**

     None proposed.

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

   It is not the intent of the Comprehensive Plan amendments to conflict with local, state, or federal laws or requirements for the protection of the environment. All future development projects will be required to comply with the City's Critical Ordinances and all relevant local, state, and federal laws regarding the protection of the environment.



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PROPERTY DESCRIPTIONS

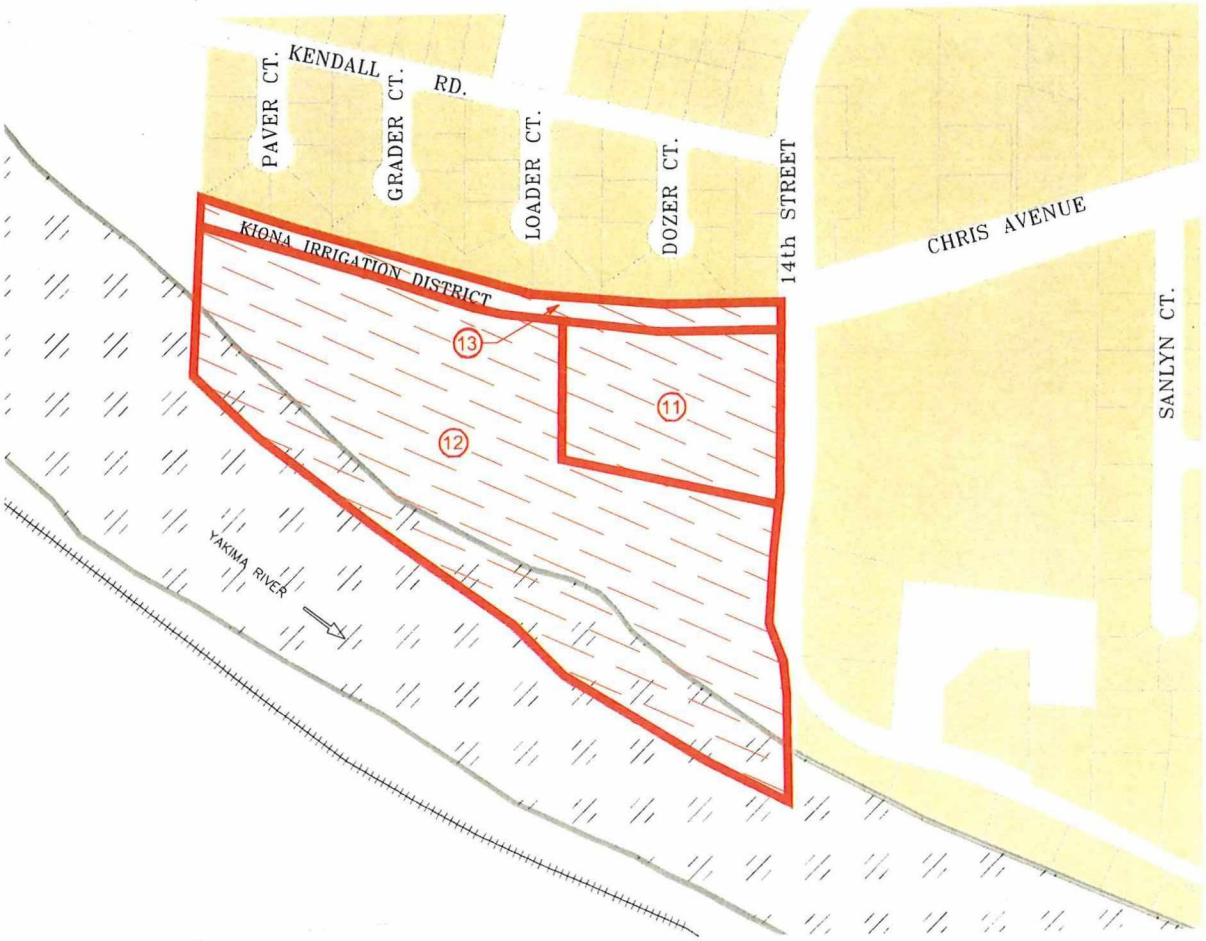
ALL PROPERTIES COUNTY ZONING: RL-5
PROPOSED CITY LAND USE: RESIDENTIAL

1. OLSEN FAMILY LLC
   112964000005000
   5.03 ACRES
2. OLSEN FAMILY LLC
   112964000006000
   5.03 ACRES
3. OLSEN FAMILY LLC
   112964000010000
   5.03 ACRES
4. OLSEN FAMILY LLC
   112964000011000
   4.52 ACRES
5. DWS ORCHARDS LLC
   112964000008000
   6.23 ACRES
6. DWS ORCHARDS LLC
   112964000009000
   1.95 ACRES
7. DWS ORCHARDS LLC
   112964011346001
   1.85 ACRES
8. DWS ORCHARDS LLC
   112964011346002
   1.97 ACRES
9. DWS ORCHARDS LLC
   112964011346003
   1.00 ACRES
10. DWS ORCHARDS LLC
    112964011346004
    1.00 ACRES

DETAIL 1

NORTH

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PROPERTY DESCRIPTIONS

DETAIL 2

NORTH

(11) GOODE LLOYD L
113964011991001
3.53 ACRES
CURRENT COUNTY ZONING: RL-5
PROPOSED CITY LAND USE: RESIDENTIAL

(12) DEPARTMENT OF WILDLIFE
113964011991002
15.70 ACRES
CURRENT COUNTY ZONING: PARKS
PROPOSED CITY LAND USE: PARKS

(13) KIONA IRRIGATION DISTRICT RIGHT OF WAY
≈1.81 ACRES
CURRENT COUNTY ZONING: RL-5
PROPOSED CITY LAND USE: PARKS

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Appendix E
Population and Housing Memorandum

Benton County Population and Housing Needs Allocation

2026 Comprehensive Plan Update Cycle

Introduction

Recent changes to the Washington Growth Management Act (GMA) require that local governments "plan for and accommodate housing affordable to all economic segments of the population of the state." It also updated the requirements for comprehensive plan housing elements in RCW 36.70A.070(2). State law now requires Washington State Department of Commerce (Commerce) to project future housing needs including "units for moderate, low, very low and extremely low-income households and emergency housing, emergency shelters and permanent supportive housing." Guidance published by Commerce[1] details how Counties, working with their constituent municipalities, can quantify these projected countywide housing needs and then allocate them to local jurisdictions within the county. These housing needs allocations, in turn, must be documented in the housing element of each jurisdiction's comprehensive plan.

Benton County asked White Bluffs Consulting and BERK Consulting to facilitate and support the allocation process for the 2026 comprehensive planning cycle. The process involved two meetings where Benton County convened with the cities of Benton City, Kennewick, Prosser, Richland, and West Richland. During these meetings, participants reviewed relevant GMA requirements, analysis of population and housing permit trends, and various options for the allocation of countywide housing needs to individual jurisdictions. This report documents the results of this process and final methodology used for allocation.

Requirements for the Allocation

Commerce guidance on Establishing Housing Targets for comprehensive plan housing elements includes six minimum standards for allocating projected housing needs, listed below.

1. The jurisdiction must select a population target that is within the range of Washington State Office of Financial Management (OFM) Low, Medium and High GMA Population Projection.
2. The county must use Commerce's Housing for All Planning Tool (HAPT) to identify housing need projections associated with the population target. The housing needs for each income level, PSH and emergency housing must be consistently derived from the same target population input using the HAPT.

[1] Washington State Department of Commerce, 2023. *Establishing Housing Targets for your Community*. https://deptofcommerce.app.box.com/s/chqj8wk1esnnranyb3ewzgd4w0e5ve3a

3. Allocations must be consistent with any relevant countywide planning policies or multicounty planning policies that address housing.
4. The sum of all housing needs allocated to local jurisdictions in a county must be no less than the total projected countywide need. This should be true for each income level, PSH and emergency housing. Within city limits, cities may choose to plan for more housing need particularly in the face of new middle housing and ADU laws, which result in more capacity.
5. The allocation of housing needs to each local jurisdiction and the sum of housing needs to all jurisdictions should be documented in a public-facing summary document at the countywide level prior to the periodic update, such as an addendum to the countywide planning policies or a resolution adopted by all jurisdictions.
6. Each jurisdiction's allocation of projected housing needs by income level, PSH and emergency housing must be documented in their comprehensive plan housing element and consistently used in the comprehensive plan.

In addition to these minimum standards, Benton County identified two additional requirements for this allocation:

- The allocation for unincorporated Benton County is intended to be addressed in rural areas (as opposed to unincorporated urban growth areas).
- The allocation for rural unincorporated Benton County must not include housing needs below 80% AMI. This is because housing types most suitable for meeting those housing needs are not typically allowed in rural zones, and associated services necessary to support at lower income levels are much more limited in rural zones.
- All allocations to cities will be accommodated within city limits.

Housing for All Planning Tool (HAPT)

To support this allocation process, BERK Consulting made use of a spreadsheet tool created by Commerce. The HAPT takes user input for the countywide population projection and the share of growth to allocate to each jurisdiction. Based on these inputs it produces an allocation output table that addresses all projected housing needs by income as well as permanent supportive and emergency housing.

It is not required that counties use HAPT to support allocation. But HAPT simplifies the process and ensures compliance with GMA and Commerce guidance. The tool includes three different methods as options for allocating growth by jurisdiction. Only one of the methods, Method C, prevents allocating low-income (0-50% AMI) housing needs to rural unincorporated areas. For this allocation process, BERK made a small modification to Method C that prevents allocating any housing needs below 80% AMI to rural areas.

One output of the HAPT is population projections for each jurisdiction. These projections are calculated to be consistent with the selected countywide population projection, housing needs allocations, and differences in household size between jurisdictions.

Allocation Method

Projected Countywide Housing Needs

Commerce's HAPT projects countywide housing needs based on the selected countywide population projection for the 20-year planning period. Benton County selected the Medium population projection published by the Office of Financial Management, which estimates the county will grow to 278,456 in total population by the year 2046. This will result in 38,260 additional units needed between 2020 – 2046. Based on that input, HAPT produces a table of countywide housing needs, shown in Exhibit 1. In addition, between 2020 and 2046 Benton County also needs to add 136 emergency housing units (Exhibit 3) countywide to address projected housing needs identified in the HAPT.

Exhibit 1. Countywide Housing Needs in Benton County (All Jurisdictions Combined)

		Permanent Housing Needs by Income Level (% of Area Median Income)						
	Total	0-30% Non-PSH	0-30% PSH	>30-50%	>50-80%	>80-100%	>100-120%	>120%
Housing supply in 2020	79,442	2,453	145	13,090	31,122	12,139	8,218	12,275
Total housing need in 2046	117,702	6,662	2,801	19,714	35,794	15,091	11,563	26,077
Additional units needed 2020-2046	**38,260**	**4,209**	**2,656**	**6,624**	**4,672**	**2,952**	**3,345**	**13,802**

PSH = Permanent Supportive Housing
Source: BERK, 2025 based on Commerce HAPT.

Allocation Shares by Jurisdiction

To allocate these housing needs using the HAPT, the user must enter percentage shares of future housing growth for each jurisdiction. To support this decision, BERK analyzed historic housing permit trends by jurisdiction for the years 2010 through 2024. The results are shown in Exhibit 2. Available data on housing permit trends included only "frame housing units" (conventional homes built on site) which exclude manufactured homes built offsite. Given that the placement of new manufactured homes provides an important component of the housing stock in some areas, BERK conducted additional analysis to estimate net new manufactured homes. Finally, BERK calculated each jurisdiction's percentage share of total countywide new homes during this period.

Exhibit 2. Average Annual Housing Units Permitted by Jurisdiction, 2010-2024

Jurisdiction	Completed Frame Housing Units	Net New Manufactured Homes*	Total New Homes	Percentage of Countywide Total New Homes
Benton City	23	2	25	2%
Kennewick	411	16	427	33%
Prosser	30	1	32	2%
Richland	472	4	476	37%
West Richland	160	5	165	13%
Unincorporated	135	28	163	13%
Total	**1,232**	**56**	**1,288**	**100%**

*Note: Reliable data for net new manufactured homes is only available for the period of 2020-2024. Therefore, the data here reflects this shortened period.
Source: OFM, 2024; BERK, 2025.

Next, BERK entered the percentage shares from Exhibit 2 into HAPT. The result is shown in Exhibit 3.

Exhibit 3. Allocation of Housing Needs to Jurisdictions, 2020-2046

		Permanent Housing Needs by Affordability Level (% of AMI)							
Jurisdiction	Total Units Allocated	0-30% Non-PSH	0-30% PSH	>30-50%	>50-80%	>80-100%	>100-120%	>120%	Emergency Housing Allocation
Benton City	765	97	61	152	107	59	67	222	3
Kennewick	12,626	1,597	1,007	2,513	1,772	974	1,104	3,659	57
Prosser	765	97	61	152	107	59	67	222	5
Richland	14,155	1,789	1,130	2,817	1,988	1,092	1,237	4,102	52
West Richland	4,975	629	397	990	698	384	435	1,442	19
Unincorporated Rural	4,974	0	0	0	0	384	435	4,155	0
Total	**38,260**	**4,209**	**2,656**	**6,624**	**4,672**	**2,952**	**3,345**	**13,802**	**136**

PSH = Permanent Supportive Housing
Source: BERK, 2025 based on Commerce HAPT.

Projected Population Growth by Jurisdiction

HAPT calculates population in 2046 by jurisdiction based on the selected countywide population projection and housing needs allocation by jurisdiction. The calculations account for baseline differences

in average household size by jurisdiction and are adjusted to maintain consistency with the countywide population projection. The results are shown in Exhibit 4.

Exhibit 4. Projected Population Growth 2020 – 2046 by Jurisdiction

Jurisdiction	2020 Population	2046 Population	Population Growth (2020-2046)
Benton City	3,479	4,985	1,506
Kennewick	83,921	108,989	25,068
Prosser	6,062	8,292	2,230
Richland	60,560	82,448	21,888
West Richland	16,295	26,387	10,092
Unincorporated	36,556	47,355	10,799
Total	**206,873**	**278,456**	**71,583**

Source: BERK, 2025 based on Commerce HAPT.

Recommendations for Documentation

Commerce guidance[2] states "[t]he allocation of housing needs to each local jurisdiction and the sum of housing needs to all jurisdictions should be documented in a public-facing summary document at the countywide level prior to the periodic update, such as an addendum to the countywide planning policies or a resolution adopted by all jurisdictions." In addition, it states "Each jurisdiction's allocation of projected housing needs by income level, PSH and emergency housing must be documented in their comprehensive plan housing element and consistently used in the comprehensive plan."

Accordingly, each Benton County jurisdiction must document their allocation of housing needs from Exhibit 3 in their comprehensive plan housing element. Commerce's Guidance for Updating Your Housing Element provides additional guidelines for evaluating whether sufficient land capacity is available to accommodate these housing needs and determine what adequate provisions are required to remove barriers to housing availability. Jurisdictions should also use the population projections from Exhibit 4 in their comprehensive plans to maintain consistency with countywide growth projections and their housing needs allocation.

[2] Commerce, 2023. *Establishing Housing Targets for your Community*. p. 60.

Benton County Comprehensive Plan

Analysis of Racially Disparate Impacts

In alignment with the GMA amendments outlined in HB 1220, cities and counties have a responsibility to begin to undo the policies and practices that have contributed to racially disparate impacts, displacement, and exclusion in housing. They are also tasked with adopting policies that actively mitigate these impacts. This memo presents evidence of racially disparate impacts, exclusionary patterns, and displacement risks within Benton County.

Communities of interest

As of 2023, about 65.7% of the Benton County population identifies as White alone, a percentage that has been declining as the population becomes more diverse. In 2018, that share was 70.9%. Among BIPOC residents, the largest group is those who identify as Two or more races (3.8%) followed by Asian alone (2.9%). Hispanic or Latino/a residents of any race make up 24.8% of the population. Additionally, while people who identify as American Indian and Alaskan Native alone make up a relatively small share of the overall population (0.4%), many people with native ancestry identify as two or more races.[1]

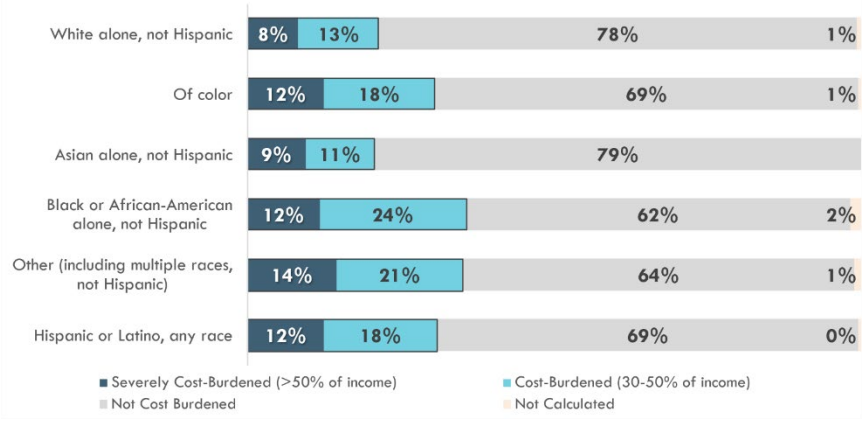
Racially disparate impacts

Disparities in housing cost burden

In Benton County, households with lower incomes are more likely to experience housing affordability challenges. Analyzing housing cost burden by race and ethnicity can reveal systemic disparities in housing affordability that may stem from historical discrimination, residential segregation, and unequal access to economic opportunities among different racial and ethnic groups. Figure 61 shows that approximately 30% of Person of Color households in Benton County were either moderately or severely cost burdened in 2020, compared to only 21% of households that identify as White alone. Among Hispanic or Latino households, 30% are cost burdened.

[1] Source: 2014-2018 and 2019-2023 ACS Five-Year Estimates.

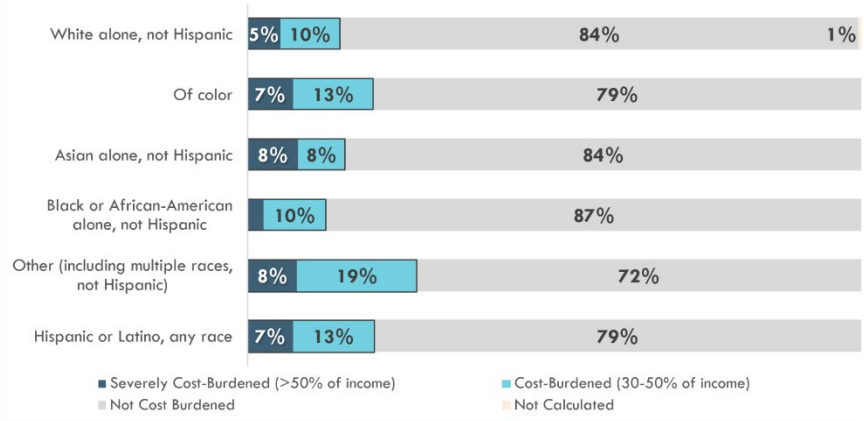
Figure 61 Proportion of All Households by Race and Cost Burden, Benton County (2016-2020)



Sources: US HUD Comprehensive Housing Affordability Strategy (CHAS), 2016–2020; BERK, 2025.

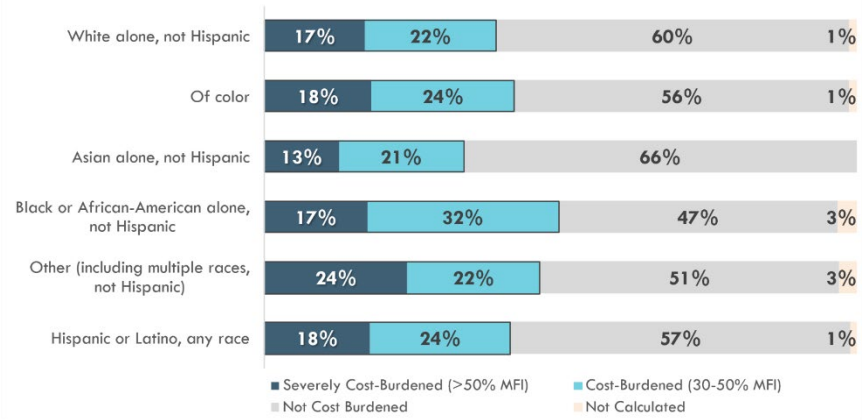
In general, renters are more likely to be cost-burdened than homeowners, highlighting a connection between housing vulnerability and tenure. While 15% of White-alone and 20% of People of Color owner households are cost-burdened, the rates are significantly higher among renters: 39% for White-alone and 42% for People of Color renter households (See Figure 62 and Figure 63).

Figure 62 Owner Households by Race and Cost burden, Benton County (2016-2020)



Sources: US HUD Comprehensive Housing Affordability Strategy (CHAS), 2016–2020; BERK, 2025.

Figure 63 Renter Households by Race and Cost Burden, Benton County (2016-2020)

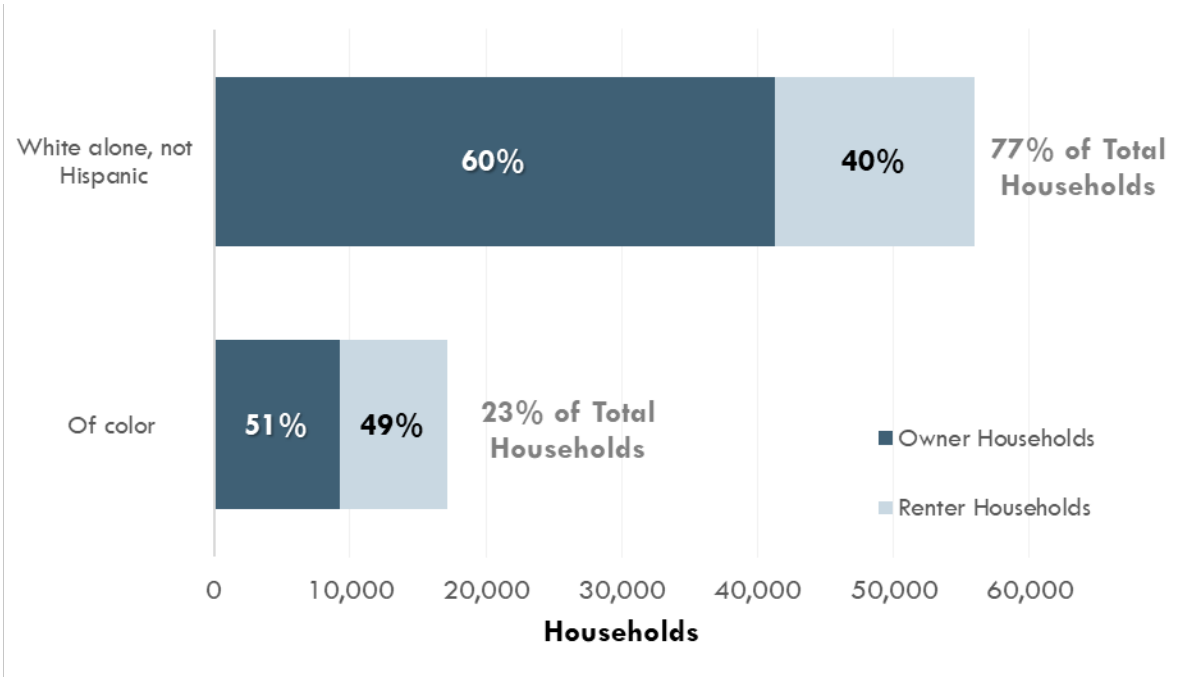


Sources: US HUD Comprehensive Housing Affordability Strategy (CHAS), 2016–2020; BERK, 2025.

Racial and Ethnic Disparities in Homeownership

Nearly 6 out of 10 households that identify as White alone own their own homes. The rate of homeownership is lower for People of Color households (51%).

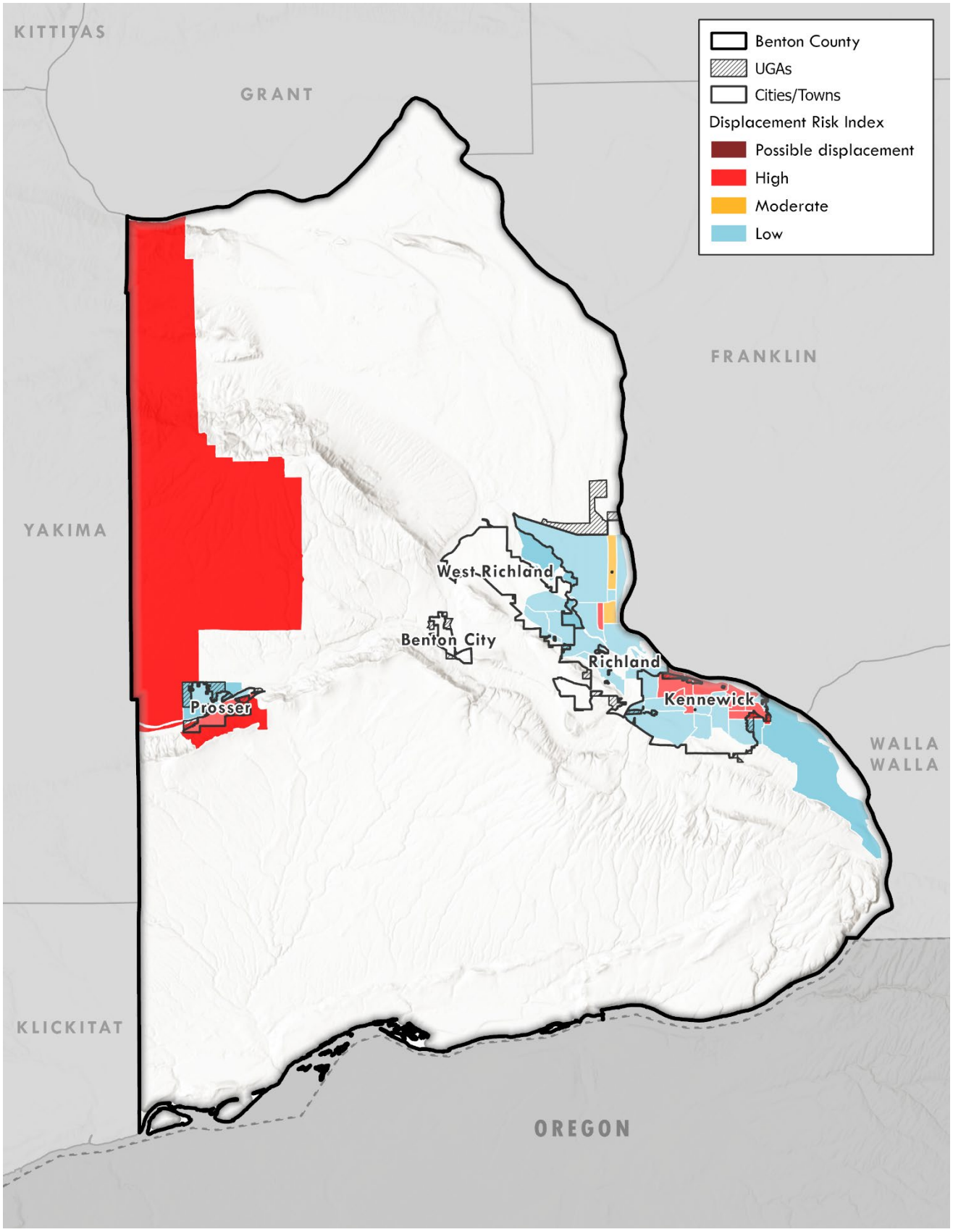
Figure 64 Homeownership by Race and Ethnicity, Benton County (2016-2020)



Sources: US HUD Comprehensive Housing Affordability Strategy (CHAS), 2016–2020; BERK, 2025.

Figure 65 indicates most of the displacements in Benton County occurring in the Kennewick, Richland and Finley area. Within the rural county, displacement is shown on the west side, from Whitstran area to the rural area on the north side of the county limits. Within Kennewick, Richland and Finley area, high risk of displacement is indicated mostly in north Kennewick, and moderate displacement risk is shown in portions in Richland. Rest of the urban area has low risk of displacement.

Figure 65 Displacement Risk Map, Benton County



Source: Department of Commerce, 2026; BERK 2026

Exclusion

According to the Washington State Department of Commerce:[2]

> *Exclusion is the act or effect of shutting or keeping certain populations out of housing within a specified area, in a manner that may be intentional or unintentional. Historically, racially restrictive covenants were a form of explicit exclusion. Exclusion did not end when federal courts found restrictive covenants unconstitutional. Regulations such as large lot zoning and lending practices, among other local, state and federal policies, all served to further segregation. Exclusion may extend beyond race to income, ethnicity or other sociodemographic characteristics.*

Benton County had a residential segregation index of 54 for Black and White residents during the period from 2019 to 2023.[3] This index ranges from 0 to 100, with lower values indicating less residential segregation and 100 representing complete segregation. The score reflects the percentage of either Black or White residents who would need to move to different geographic areas within the county to achieve a distribution that matches the racial composition of the larger region. Generally, an index value of 60 or above is considered very high. Values in the 40 to 50 range indicate moderate segregation, while values of 30 or below suggests relatively low segregation.

Displacement risk

Displacement occurs when a household is forced to move from its community due to conditions beyond their control. The Washington State Department of Commerce defines three types of displacement:

- **Economic displacement:** Households are compelled to move by rising rents or costs of homeownership like property taxes.
- **Cultural displacement:** Residents are compelled to move because the people and institutions that make up their cultural community have left the area.
- **Physical displacement:** Households are directly forced to move for reasons such as eviction, foreclosure, natural disaster, or deterioration in housing quality.

Evictions in Washington are a concern in both urban and rural areas. Between September 2023 and September 2024, Benton County served 639 eviction filings. This corresponds to 2.6 filings per 100 renter households, placing Benton County 5th in the state by filing rate and higher than the state average of 2.1 filings per 100 renter households.[4] Additionally, eviction data in Washington reveal notable disparities: women are more likely to be evicted than men, and eviction rates among Black and Latinx adults are often higher than those among white adults.[5]

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[2] Source: Washington State Department of Commerce (2023). *Guidance to Address Racially Disparate Impacts: Updating your housing element to address new requirements.* https://deptofcommerce.app.box.com/s/1l217l98jattb87qobtw63pkplzhxege

[3] Source: National Institutes of Health (NIH), Washington Residential Segregation, 2019-2023.

[4] Source: Eviction Research Network, 2024.

[5] Source: Thomas, T. A., Toomet, O., Kennedy, I., & Ramiller, A. (2020). The State of Evictions: Results from the University of Washington Evictions Project. *Eviction Research Network*. https://evictionresearch.net/washington/report/State_of_Evictions_2020/index.html

Displacement can also occur due to physical conditions of homes. Older housing stock is not inherently in poor condition. However, aging homes that have not been adequately maintained or updated over time may indicate a need for repairs and reinvestment. At the same time, older homes often serve as a source of naturally occurring affordable housing. In Benton County, approximately 27% of housing units were built before 1970, highlighting both the potential need for rehabilitation and the role these units may play in housing affordability.[6]

Actions to support housing diversity and affordability in rural Benton County can help to reduce displacement risk.

[6] Source: 2019-2023 ACS Five-Year Estimates.

Appendix F
Agricultural Lands Reclassification Memorandum (2018)

720 Olive Way, Suite 1900
Seattle, Washington 98101
206.287.9130

ANCHOR QEA

Memorandum

January 1, 2018

To: Jerrod MacPherson, Benton County Planning Department

From: Adam Hill and Ben Floyd, Anchor QEA

Re: Agricultural Resource Land Reclassification

Introduction

Benton County is amending their Comprehensive Plan through a comprehensive 2017 plan update. As part of these amendments, it was determined that a county-wide review of agricultural resource lands be completed, as the designated lands had not been reviewed and updated for several years, and to confirm a more complete set of designation factors are addressed in the updated analysis. This memorandum describes work completed as part of this review and analysis process, including the elements necessary to consider for agricultural resource land classification, findings from the review, and recommended changes to agricultural resource lands in Benton County.

Agricultural Resource Land Considerations

Benton County is required to implement a comprehensive plan under Revised Code of Washington (RCW) 36.70A.040. As part of this requirement, "the county…**shall designate** critical areas, **agricultural lands**, forestlands, and mineral resource lands, and **adopt development regulations conserving these designated agricultural lands**, forestlands, and mineral resource lands and protecting these designated critical areas" (emphasis added) (RCW 36.70A.040(3)(b)).

Agricultural land is defined 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…, finfish in upland hatcheries, or livestock, **and that has long-term commercial significance for agricultural production**" (emphasis added) (RCW 36.70A.030(2)). Long-term commercial significance "includes the **growing capacity, productivity, and soil composition of the land** for long-term commercial production, in consideration with the land's proximity to population areas, and the possibility of more intense uses of the land" (emphasis added) (RCW 36.70A.030(10)). Additionally, in *Lewis County v Western Washington Growth Management Hearings Board* (2006), it is noted that "[i]f the farm industry cannot use land for agricultural production due to economic, irrigation, or other constraints, the possibility of more intense uses of the land is heightened. RCW 36.70A.030(10) permits such considerations in designating agricultural lands."

Further, each county "shall designate where appropriate [a]gricultural 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" (RCW 36.70A.170(1)(a)). A county "may use a variety of innovative zoning techniques in areas designated as agricultural lands of long-term commercial significance…. The innovative zoning techniques should be designed to conserve agricultural lands and encourage the agricultural economy" (RCW 36.70A.177(1)).

Washington Administrative Code (WAC) 365-190-050 establishes minimum guidelines to assist counties in classifying and designating agricultural lands. The following sections go through the minimum guidelines in WAC 365-190-050 and the approach being used to follow the guidelines.

Classification/Designation Approach

WAC 365-190-050(1) states that "counties must approach the effort as a county-wide or area-wide process. Counties…should not review resource lands designations solely on a parcel-by-parcel process. Counties…must have a program for the transfer or purchase of development rights prior to designating agricultural resource lands in urban growth areas. Cities are encouraged to coordinate their agricultural resource lands designations with their county and any adjacent jurisdictions" (WAC 365-190-050(1)).

The first part of this guideline (county-wide/area-wide process) is met because analyses and approaches developed in the following sections of this memorandum are applied county-wide as part of the review process to determine if agricultural land designations need revisions. Individual parcels are not evaluated in this process. Figure 1 shows the existing agricultural resource land designations of Benton County.

No lands are being designated as agricultural resource lands in urban growth areas, so a program to transfer or purchase development rights is not required by Benton County.

Several cities are adjacent to Benton County planning jurisdictions. Figure 1 also shows the delineation of city limits and urban growth areas within Benton County.

Development Regulations

WAC 365-190-050(2) states that counties "must adopt development regulations that assure the conservation of agricultural resource lands" (WAC 365-190-050(2)). Benton County has adopted regulations to meet this guideline; these regulations are coded in Benton County Code (BCC) Chapter 11.18. These regulations discuss allowable uses, uses requiring permits, and building requirements.

Additionally, coordination with the Benton Conservation District (CD) Board of Supervisors and staff occurred over two meetings in preparing this memorandum, one with the District Manager on

May 19, 2017, and another with the Board on June 14, 2017. The CD inquired about a setback or buffer zone between Growth Management Act (GMA) agricultural resource land and residential development, to further protect agricultural lands of long-term commercial significance, and to avoid future land use conflicts. The County confirmed a 150-foot setback is in place to perform these functions. Additionally, the Conservation District suggested opportunities for strengthening the analysis to the findings and conclusions, and provided other comments on evaluation criteria, how to incorporate Conservation Reserve Program (CRP) lands and other topics. Revisions to this memorandum were made to address these comments.

Designation Factors

WAC 365-190-050(3) states that "lands should be considered for designation as agricultural resource lands based on three factors:" 1) specifically is not characterized by urban growth, 2) is used or is capable of being used for agricultural production, and 3) has long-term commercial significance for agriculture. Each of these factors are described in more detail and analyzed below.

Urban Growth

WAC 365-190-050(3)(a) states that lands should be considered for agricultural resource designation if "the land is not already characterized by urban growth" (WAC 365-190-050(3)(a)). Urban growth areas are characterized in WAC 365-196-310. Figure 2 shows the areas in Benton County already characterized by urban growth.

These urban growth areas mapped in Figure 2 were not under consideration as agricultural resource lands for this analysis.

Production Capability

WAC 365-190-050(3)(b) states that lands should be considered for agricultural resource designation if "the land is used or capable of being used for agricultural production. This factor evaluates whether lands are well suited to agricultural use based primarily on their physical and geographic characteristics" (WAC 365-190-050(3)(b)). Production capability is described in further detail, stating that lands currently used or capable to be used for agricultural production "must be evaluated for designation" (WAC 365-190-050(3)(b)(i)), and that counties "shall use the land-capability classification system of the United States Department of Agriculture Natural Resources Conservation Service [NRCS] as defined in relevant Field Office Technical Guides" (WAC 365-190-050(3)(b)(ii)).

The NRCS land-capability classification divides soil types into eight classes. Classes 1 through 4 are generally suitable for cultivation, while Classes 5 to 8 are generally not suitable for cultivation. However, with certain types of land management, Classes 5 to 7 could be used for agriculture (Duncan 2017). Classes are different for the same soil type for irrigated and non-irrigated lands. An analysis was done using Benton CD data to determine land that is irrigated; the remaining land is

assumed to be non-irrigated. Figure 3 maps the NRCS land-capability classification for Benton County, splitting the classes into suitable, suitable with management, and non-suitable land for cultivation.

Figure 3 shows that there are some areas currently designated as agricultural resource lands that are not well suited to agricultural use, areas that can be suitable for agricultural use with certain types of land management, and other areas not designated as agricultural resource lands that may be well suited to agricultural use. Figure 4 highlights these areas. Of the areas highlighted, areas near the fringe of the current areas designated as agricultural land (along the freeway corridor and along the Columbia River) will be more likely considered for designation changes from agricultural resource lands as these areas are nearer to population centers and would have the possibility of more intense uses of the land in the long-term. Additionally, in some instances these are also the more marginal lands, particularly when considering dryland production areas.

This mapping procedure is done as an initial step to check the potential for areas to be well suited for addition or removal from agricultural resource land designation, as one consideration in the evaluation process.

Long-Term Commercial Significance

WAC 365-190-050(3)(c) states that lands should be considered for agricultural resource designation if "the land has long-term commercial significance for agriculture" (WAC 365-190-050(3)(c)). As part of determining this, counties should consider classification of prime and unique farmland soils, availability of public facilities including roads used in transporting agricultural products, tax status, public service availability, proximity to urban growth areas, predominant parcel size, land use settlement patterns, intensity of nearby land uses, history of nearby land development permits, land values under alternative uses, and proximity to markets (WAC 365-190-050(3)(c)). In addition to the factors listed in WAC 365-190-050(3)(c), considerations for long-term commercial significance in Benton County include water availability/precipitation, enrollment in CRP/conservation land, and pesticide restrictions. The considerations employed in this analysis are described in the following order:

- Water availability/precipitation
- Parcel size
- Nearby urban growth areas, settlement patterns, land use, land values, and development permits
- Land in CRP or conservation land
- Prime farmlands
- Pesticide restrictions
- Public facilities and proximity to markets
- Tax status

Water Availability/Precipitation

One of the main considerations in Benton County for long-term commercial significance is water availability. Water availability can either come from irrigation or precipitation. If there is insufficient water available, lands cannot be commercially significant in the long-term.

To assist in determining water availability for dryland production areas, an analysis of precipitation was completed using data from Washington State University's AgWeatherNet, a network of weather stations throughout Washington State (including Benton County) that monitor several weather aspects, including precipitation. The mean (average) annual precipitation was collected from the AgWeatherNet web site and averages over the past 5 years, 9 years, and over the period of record (up to 24 years) were compared for the 32 stations in Benton County. Most stations (27 of the 32) had at least 5 years of records, and over half had at least 9 years of records. The 9-year average was also similar to the period of record for stations with longer records, so for purposes of this analysis, a 9-year annual average was used. Precipitation was estimated for most of Benton County using an inverse distance weighted interpolation that was log-normalized and back-transformed through GIS analysis. Figure 5 shows the results of this analysis.

The precipitation analysis is compared against non-irrigated lands that are suitable for cultivation in Figure 6. This figure highlights lands that would typically be suitable but may not be getting sufficient water to be long-term commercially significant. For this analysis, it was assumed that less than 6.5 inches (annual average) was not sufficient. This is based on information provided by John Christensen, a Benton County producer, who has records of yield and net profits or losses information for dryland farming at various annual precipitations and elevations. Lower precipitation areas had significant net losses while higher precipitation areas had net profits. Specifically, areas with mean annual precipitations of 4 to 6 inches had net losses of $13 to $62 per acre for continuous crops and net losses of $68 to $118 per acre for summer/fallow crops. Areas with mean annual precipitation of 9 to 11 inches had net profits of $90 to $118 per acre for continuous crops and net profits of $41 to $69 per acre of summer/fallow crops (Christensen 2016).

The areas that fit into non-sufficient precipitation and dryland farming include land immediately south of the Richland/Kennewick border, areas in Finley, and areas south of Prosser on the Horse Heaven Hills. In communications with the CD Board of Supervisors, the Board identified that most of the lands with lower yields are enrolled in CRP, or were enrolled historically, with many of these lands left uncultivated after CRP contracts expired.

Elevations in Benton County were also briefly reviewed to note any relationship between elevation and precipitation in Benton County. Generally, precipitation increased as elevations increased. The low-lying areas near Richland and Kennewick had a much lower average annual precipitation than most areas in the Horse Heaven Hills in the southeastern area of the county, except as noted above.

These analyses are meant to give a general idea of precipitation in Benton County. Some areas may have more precipitation than modeled and some areas may have less precipitation than modeled. Findings from precipitation analysis are considered sufficiently accurate to draw conclusions for long-term commercial significance determinations.

Parcel Size

Agricultural lands must be large enough in area to have long-term commercial significance. An analysis was completed that compares parcel size to land use designation with a threshold of 10 acres–the threshold assumed to be needed for land to be long-term commercially significant, acknowledging as pointed out by the CD that smaller acreages may be adequate for certain high value crops such as tree fruits or wine grape vineyards. County land use designations for smaller parcels allow for development of these higher value crops, as desired. Figure 7 highlights the large parcels outside of agricultural resource land designation and small parcels inside of agricultural resources designation that may have potential for change based solely on parcel size. Capability class is also included in Figure 7 for reference.

Lands that have parcel sizes below the 10-acre threshold that are currently designated as agricultural resource lands include areas southwest of Richland and southeast of Benton City, and areas south of West Richland and northeast of Benton City.

Lands with parcel sizes above the 10-acre threshold and not currently designated as agricultural resource lands include areas east of Paterson, areas north of Plymouth, and land throughout the highway corridor. Many of these lands do not have suitable soils for cultivation without management, or they are already reserved as public or open spaces.

Nearby Urban Growth Areas, Settlement Patterns, Land Use, Land Values, and Development Permits

Some areas were included as agricultural lands when these lands included irrigation systems, permanent crops, and other evidence of ongoing agricultural land use, if they were larger parcels, and had a mix of rural residential and smaller agricultural operations around them with no clear land use settlement or higher intensity uses nearby. These lands were often adjacent to other agricultural lands. Other areas, including larger parcels in some cases, were considered for reclassified from GMA Agriculture to other designations if they were more marginal farm ground (typically dryland) and adjacent to areas developing that had experienced recent or ongoing higher intensity or urban land use settlement, associated higher land values, and also had roads and utilities in relative close proximity, as described further below. The areas demonstrating this kind of growth and development/intensity of nearby land uses to agricultural lands are the Southridge area, Badger Canyon, higher intensity residential development in Finley, and development south of Badger Mountain in South Richland.

Land Enrolled in Conservation Reserve Program or Conservation Land

Land in CRP or conservation land may or may not mean that a land has long-term commercial significance. In some cases, land may return from CRP or conservation and have long-term commercial significance; in other cases, the land is in CRP or conservation because it is not viable to farm the land. Figure 8 maps the land noted as CRP or conservation land in Benton County.

Prime Farmlands

Some farmlands are designated as farmland of statewide importance or farmland of unique importance. These areas are mapped in Figure 9. Statewide important and unique important farmland are reviewed with previous elements listed to determine if any areas should be designated as agricultural resource land.

Some areas near Finley, areas south of Richland, and areas between the northern area of West Richland and Richland are noted as farmlands of statewide importance.

Pesticide Restrictions

Benton County has restrictions to certain pesticide applications. Some areas have more stringent restrictions than others, which include prohibition of aerial application of insecticides labeled with the signal words “danger/poison” and restricted use herbicides (WAC 16-230-810). These areas are specifically located in the Northeast Horse Heaven Hills and reduce the potential of being long-term commercially viable due to the potential of added costs of hand-applying pesticides or reduced yield from not applying pesticides. While as a stand-alone factor, this may not result in removal of land classified as long-term commercially significant, it can be one additional factor in areas where lower yields typically occur could tip the balance away from designating an area as long-term commercially significant.

Public Facilities and Proximity to Markets

Most areas in Benton County have sufficient facilities available to the public for transportation of agricultural goods such that they are not limiting to long-term commercial significance. Some areas were considered for reclassification from GMA Agriculture to other designations if they had public facilities such as urban water and sewer systems nearby and available, and a relatively dense network of public roads also available. These areas include the Southridge area, Badger Canyon, and the area south of Badger Mountain.

In terms of proximity to markets, most areas are relatively close to markets such that this element does not limit an area’s long-term commercial significance.

Tax Status

Tax status for lands analyzed were unremarkable. The tax status for the areas reviewed and considered for agricultural land removal includes residential vacant lots, limited use areas, mobile homes, rural residential, dry agricultural land, and pasture.

Food Security

WAC 365-190-050(4) states that "counties may consider food security issues, which may include providing local food supplies for food banks, schools and institutions, vocational training opportunities in agricultural operations, and preserving heritage or artisanal foods (WAC 365-190-050(4)).

Benton County does not explicitly consider food security issues as Benton County is a net exporter of agriculture; however, this element was reviewed to ensure food security is not a concern for the area.

Sufficiency

WAC 365-190-050(5) states that "the process should result in designating an amount of agricultural resource lands sufficient to maintain and enhance the economic viability of the agricultural industry in the county over the long term; and to retain supporting agricultural businesses, such as processors, farm suppliers, and equipment maintenance and repair facilities" (WAC 365-190-050(5)).

In addition to agricultural resource land, Benton County has proposed adding a new land designation called Rural Resource land. This land is less dense than previous land designations (typically changing from 5-acre to 20-acre minimums), preserving agriculture and range lands generally on steeper and north-facing sloped lands, and expanding the areas where agriculture production can occur. This new designation is a variation of an innovative zoning approach as referenced in introductory information above.

To ensure the sufficiency of agricultural resource lands, an area comparison will be made of agricultural resource areas designated for removal and new agricultural resource area designations.

Local Importance

WAC 365-190-050(5) states that "counties…may further classify additional agricultural lands of local importance. Classifying additional agricultural lands of local importance should include, in addition to general public involvement, consultation with the board of the local conservation district and the local committee of the farm service agency" (WAC 365-190-050(5)).

Benton County has two American Viticultural Areas (AVAs) fully within the county boundaries and two AVAs partially located in the county boundaries. Figure 10 maps the AVAs located fully within Benton County.

Much of the AVAs are already designated as agricultural resource lands; it is recommended that these areas not be removed from designation.

Findings and Conclusions

Using the information presented in the previous sections, multiple areas in the County may be considered for reclassification. In general, it is important to maintain continuity in agricultural resource land designation; unless there are sufficient reasons that the agricultural resource land should be de-designated, land should remain as agricultural resource land to protect the resource. Therefore, many areas that may not be as suitable as agricultural land may remain within agricultural resource land designation due to its proximity to lands of other types.

Additionally, there are many areas that have potential to be removed from designation in some analyses, but not others. For example, there are several areas north of Prosser that have small parcel sizes but are currently designated as agricultural resource land. However, these areas are irrigated lands with suitable soils, so it would not be appropriate to remove them from agricultural resource land designation.

The areas that should be removed from agricultural resource land designation are areas south of Richland, Kennewick, and West Richland. These areas are near population centers, adjacent to growing areas, proximate to utilities and roads, have low precipitation without irrigation, are outside of AVAs, and follow the recent settlement pattern of the County. Some of these areas also have more restrictive pesticide regulations. Together these considerations threaten or have already reduced the viability for the long-term commercial significance of the land as agricultural land, which fits the considerations noted in Lewis County v Western Washington Growth Management Hearings Board (2006).

Areas that should be added to agricultural resource land designation are areas south of Finley, west of Benton City, and near Prosser. These areas are currently farmed, are irrigated and often have permanent crops in place, are large parcels, exist outside of urban growth areas, and are near existing land that is already designated as agricultural resource land and other rural uses.

Additionally, approximately 7,130 acres are proposed to be changed from higher density current designations to Rural Resource. This change in designation will preserve these lands for rangeland uses and agricultural production opportunity areas, such as vineyards and orchards. This can be considered an innovative zoning technique that fits RCW 36.70A.177(1) as being designed to conserve agricultural lands and encourage the agricultural economy.

Based on the information and analyses in the previous sections, some areas are proposed to be added to the agricultural land designation, some areas are proposed to be removed from the agricultural land designation. The changes are shown in Figure 11. Details of areas proposed to be added are summarized in Table 1. Details of areas proposed to be removed are summarized in Table 2.

Table 1
Agricultural Resource Lands Proposed Additions

Township/Range/Section	Area (acres)	Previous Land Use Designation	Reason(s) for Addition
T09N R24E S20,29	67	General Commercial	Irrigated land, suitable soil type, large parcel size
T09N R24E S24	171	Light Industrial	Irrigated land, large parcel size, farmland of statewide importance
T09N R24E S29,30	68	Rural Lands 5	Irrigated land, suitable soil type, large parcel size
T09N R26E S10,11.14,15,17,20,24 T09N R27E S19,30	1,160	Rural Lands 5	Irrigated land, suitable soil type, large parcel size, farmland of statewide importance
T08N R30E S34	144	Rural Lands 5	Irrigated land, suitable soil type, large parcel size
T09N R24E S24,28 T09N R25E S19,20,28,29,33,34 T09N R26E S04,05,07,17,18,19,20 T10N R26E S26,35	2,338	Rural Lands 5	Irrigated land, suitable soil type, large parcel size, farmland of statewide importance
T08N R24E S07,08,09	457	Rural Lands 5	Irrigated land, suitable soil type, large parcel size
T07N R30E S12	20	Rural Lands 5	Irrigated land, suitable soil type, large parcel size, farmland of statewide importance
T08N R30E S28,29,30	588	Rural Lands 5	Irrigated land, suitable soil type, large parcel size, farmland of statewide importance
T09N R26E S02,11	555	Rural Lands 5	Irrigated land, suitable soil type, large parcel size
T05N R27E S01 T05N R28E S06	483	Heavy Industrial	Irrigated land, suitable soil type, large parcel size
Total area (acres)	**6,051**		

Table 2
Agricultural Resource Lands Proposed Removals

Township/Range/Section	Area (acres)	New Land Use Designation	Reason(s) for Removal
T06N R30E S13,23,24,26,27 T06N R31E S07,18	122	Public	Not suitable soil type, public access to river
T08N R27E S30	2	Public	Small parcel size, public
T08N R27E S02 T08N R28E S27 T08N R30E S32 T09N R27E S21	797	Rural Remote	Parcel size, non-irrigation with low precipitation, near population center/urbanizing areas, follows settlement patterns extending to south and west of Tri-Cities, next to areas increasing in property value
T08N R28E S13,24 T08N R29E S17,18,19,20,22,23,26,27	3,644	Rural Remote	Non-irrigation with low precipitation, near population center/urbanizing areas, follows settlement patterns extending to south and west of Tri-Cities, next to areas increasing in property value
Total area (acres)	**4,565**		

Areas proposed for addition include areas that are currently farmed, are irrigated, have a suitable soil type, and are large enough to be commercially viable in the long-term. They are generally located on the border of the existing designated agricultural resource land. Areas proposed for removal are generally located near population centers, transportation systems, and public services, and have potential for more intense use.

As shown in Table 1, the areas proposed to be added to agricultural resource land designation total about 6,050 acres, while Table 2 shows the areas proposed to be removed from agricultural resource land designation total 4,565 acres. This is a net increase of approximately 1,500 acres of designated agricultural resource land. Lands added are larger in size and are already irrigated on suitable soils, while lands removed have either small parcel size, are public access, or are non-irrigated with low average annual precipitation.

In addition to the net increase of 1,500 acres of designated agricultural resource land, about 7,130 acres are designed to be changed from denser land uses to rural resource land, which (as noted

previously) is less dense than previous land designations that can be used for farms, orchards, and other agricultural land use to preserve agricultural lands.

These recommended changes follow the goals of the GMA in regard to agricultural lands. As noted in *Clark County v. Western Washington Growth Management Hearings Board* (2011), "[a] significant goal of the GMA is to identify, maintain, enhance, and conserve agricultural lands. See RCW 36.70a.020(8)." With the increase in agricultural resource land designation, removal of land that does not have long-term commercial significance, and a new land designation of rural resource land, these changes help maintain the GMA goals for agricultural lands.

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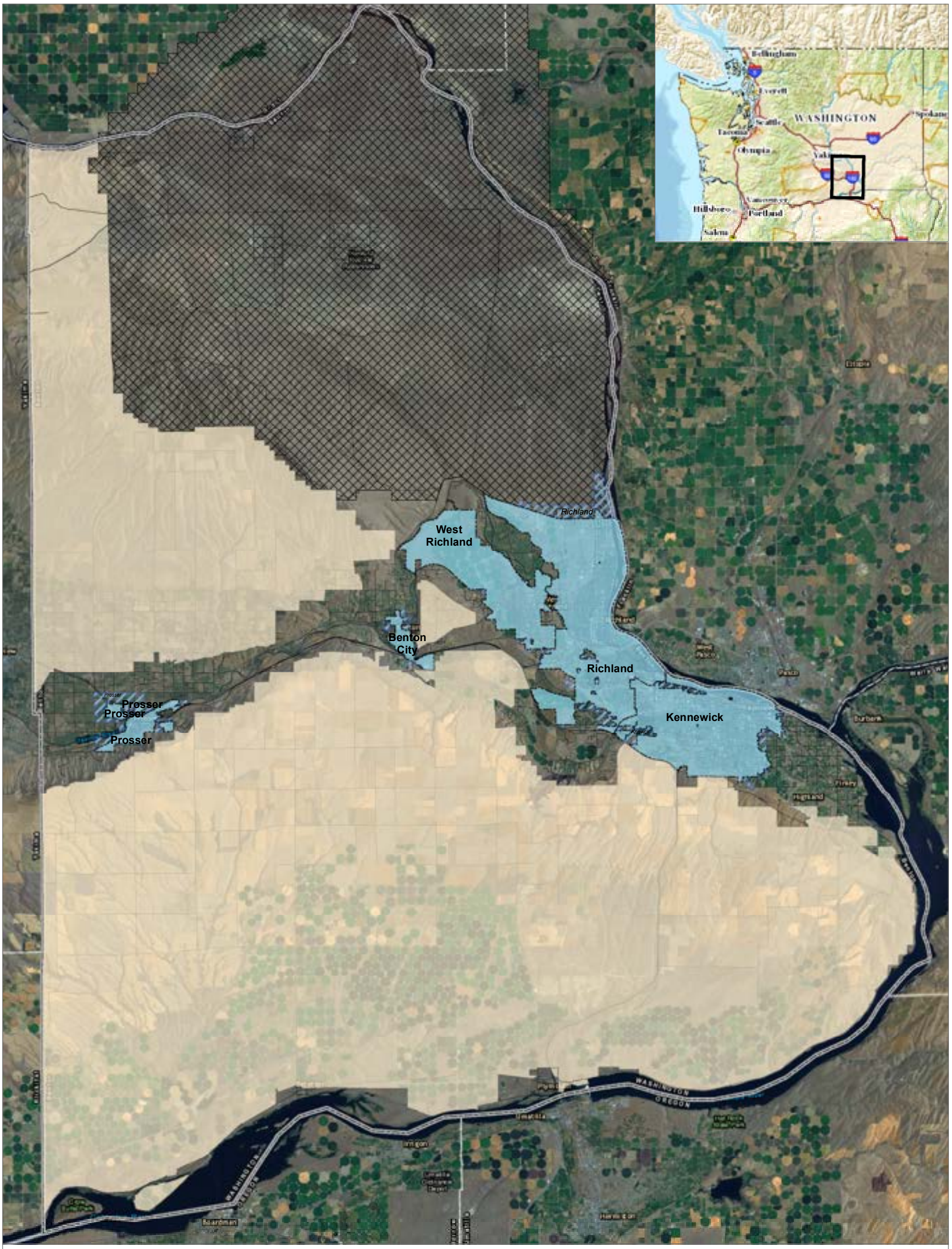
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Figures

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LEGEND:

- Roads
- City Limits
- UGA
- County Boundary
- Hanford Site

Land Use (2011)

District

- GMA AG

NOTE(S):

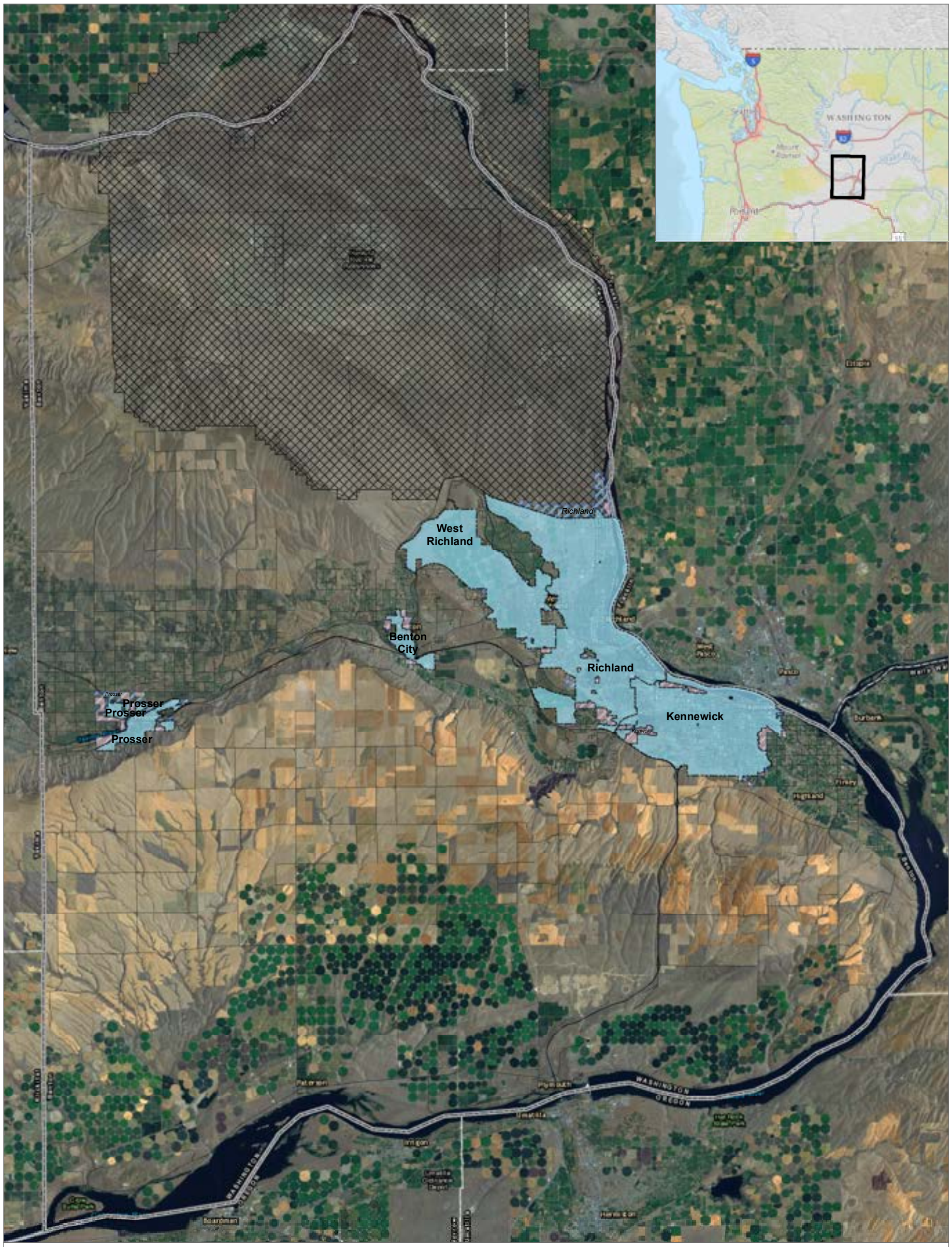
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Figure 1
Existing Designated Agricultural Resource Lands and City Planning Areas
Benton County
Agricultural Resource Land Reclassification



LEGEND:

- Roads
- City Limits
- UGA
- County Boundary
- Hanford Site

Land Use (2011)

District

- UGA

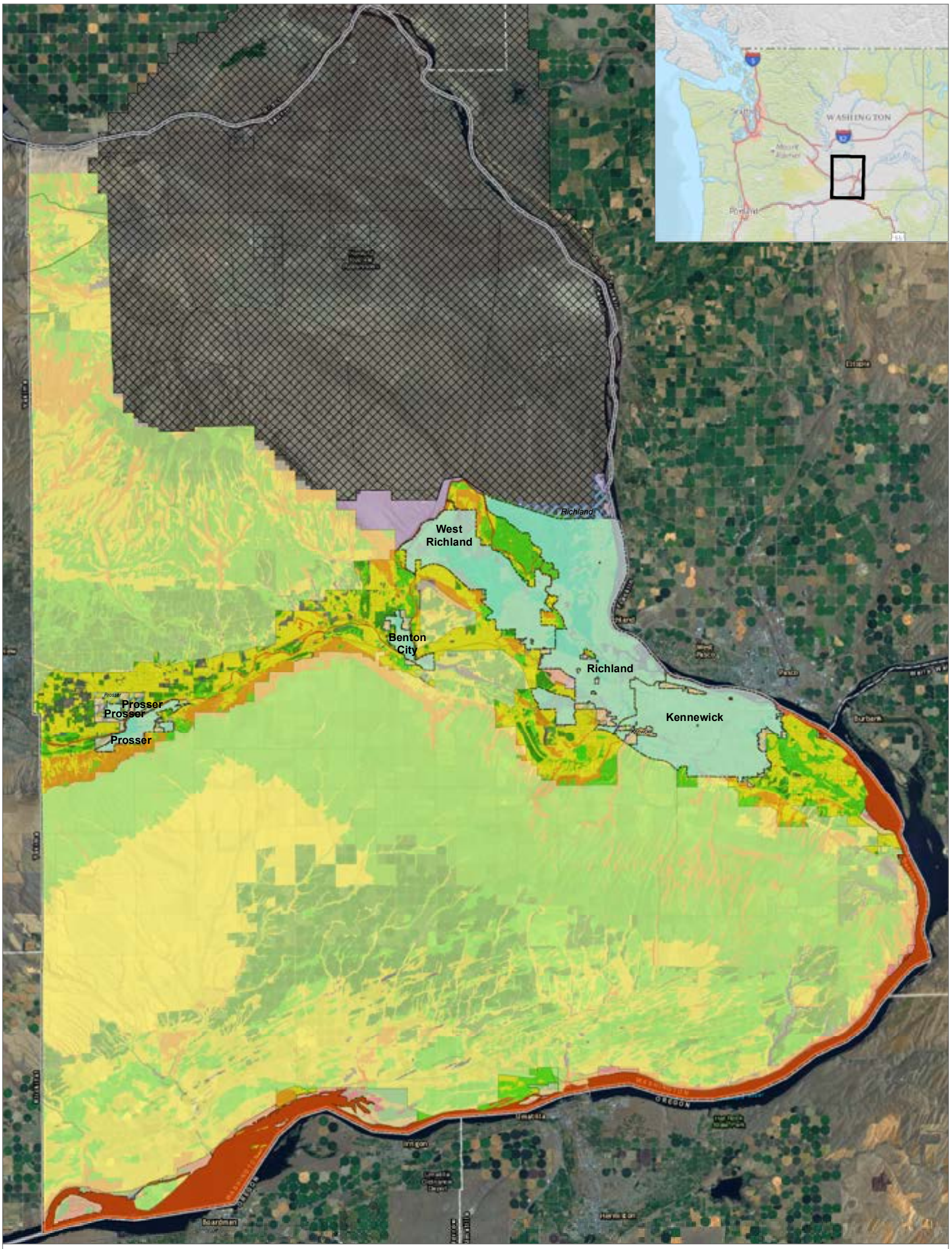
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Figure 2
Urban Growth Areas
Benton County
Agricultural Resource Land Reclassification



LEGEND:

- Roads
- City Limits
- UGA
- County Boundary
- Hanford Site

Land Use (2011)

District

- PARK DISTRICT
- UGA
- GMA AG

Capability Class

- Suitable - Class 2
- Suitable - Class 3
- Suitable - Class 4
- Suitable with Management - Class 6
- Suitable with Management - Class 7
- Non-suitable - Class 8

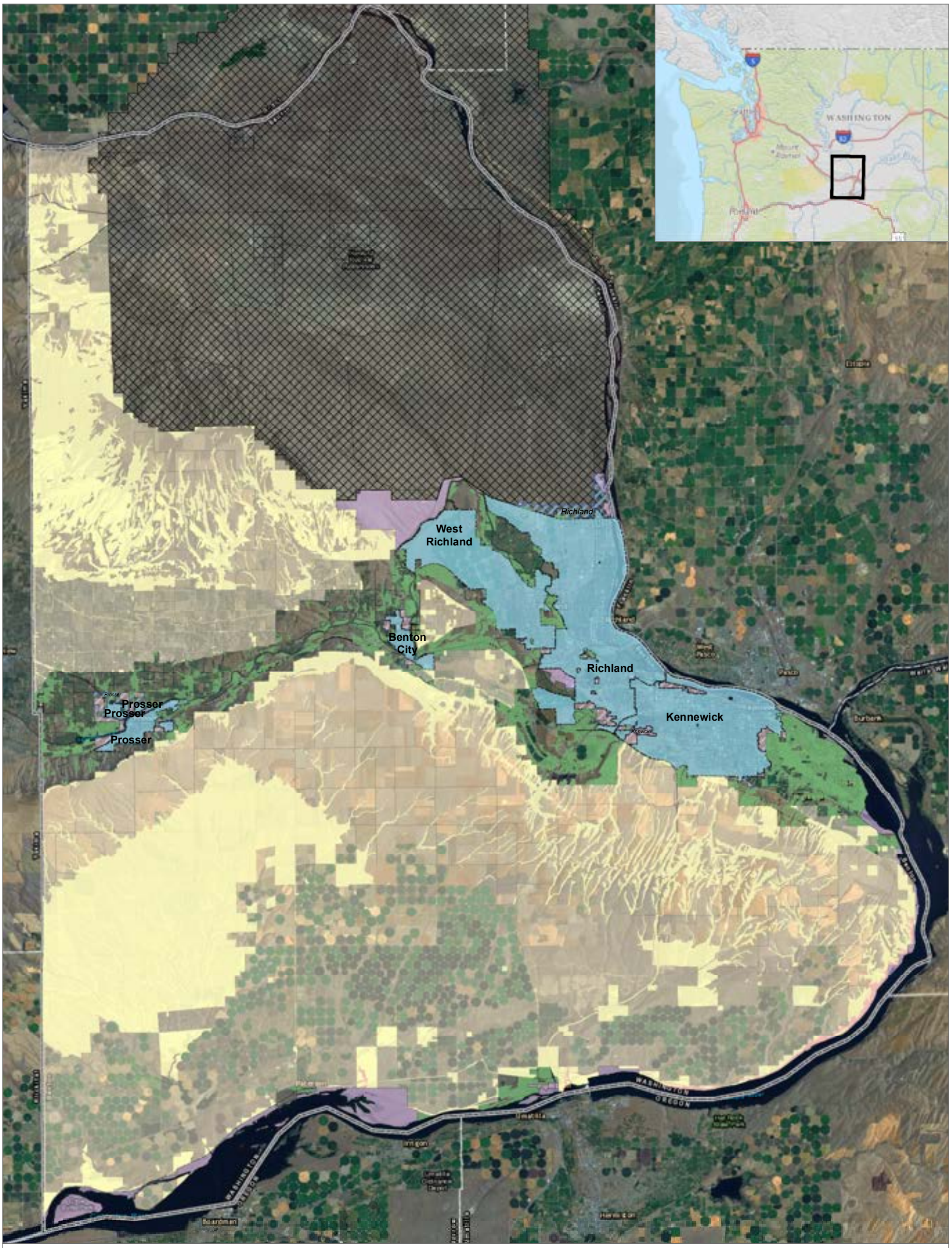
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Figure 3
NRCS Capability Class
Benton County
Agricultural Resource Land Reclassification



LEGEND:

- Roads
- City Limits
- UGA
- County Boundary
- Hanford Site

Land Use (2011)

District

- PARK DISTRICT
- UGA
- GMA AG

- Suitable capability not in GMA AG
- Suitable capability with management in GMA AG
- Non-suitable capability in GMA AG

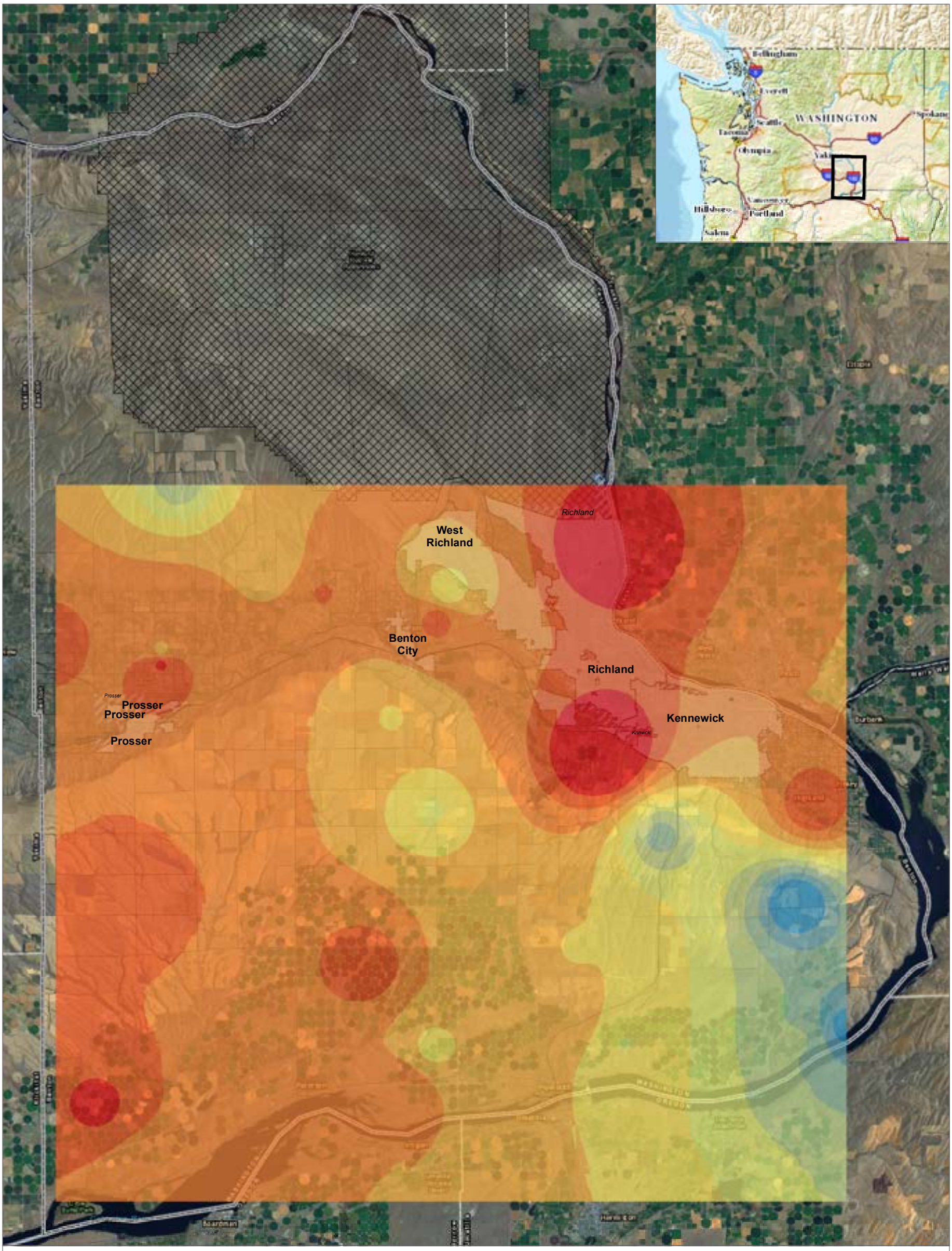
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Figure 4
Capability/Land Use Potential Mismatch Areas
Benton County
Agricultural Resource Land Reclassification

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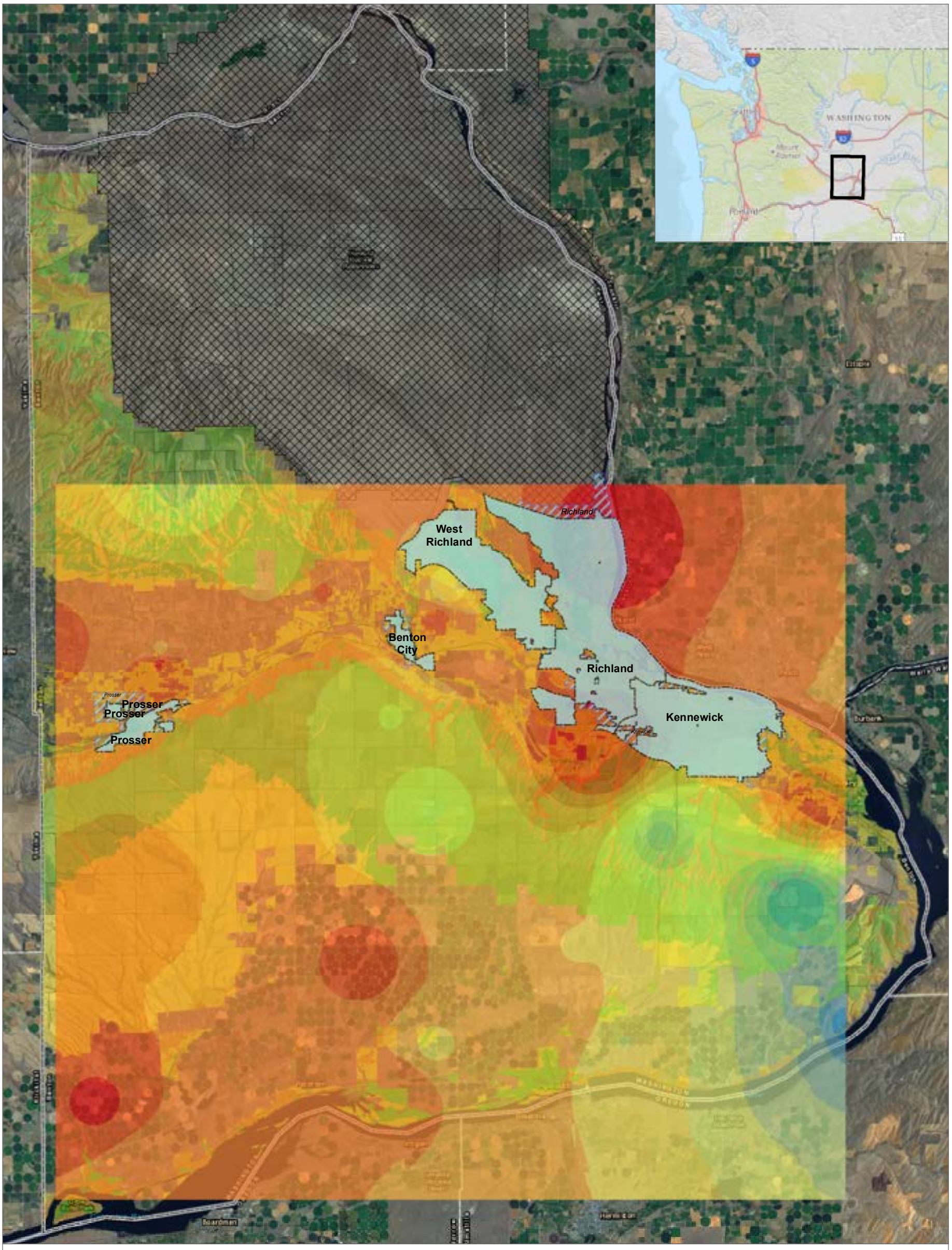


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Figure 5
Annual Average Precipitation Analysis
Benton County
Agricultural Resource Land Reclassification

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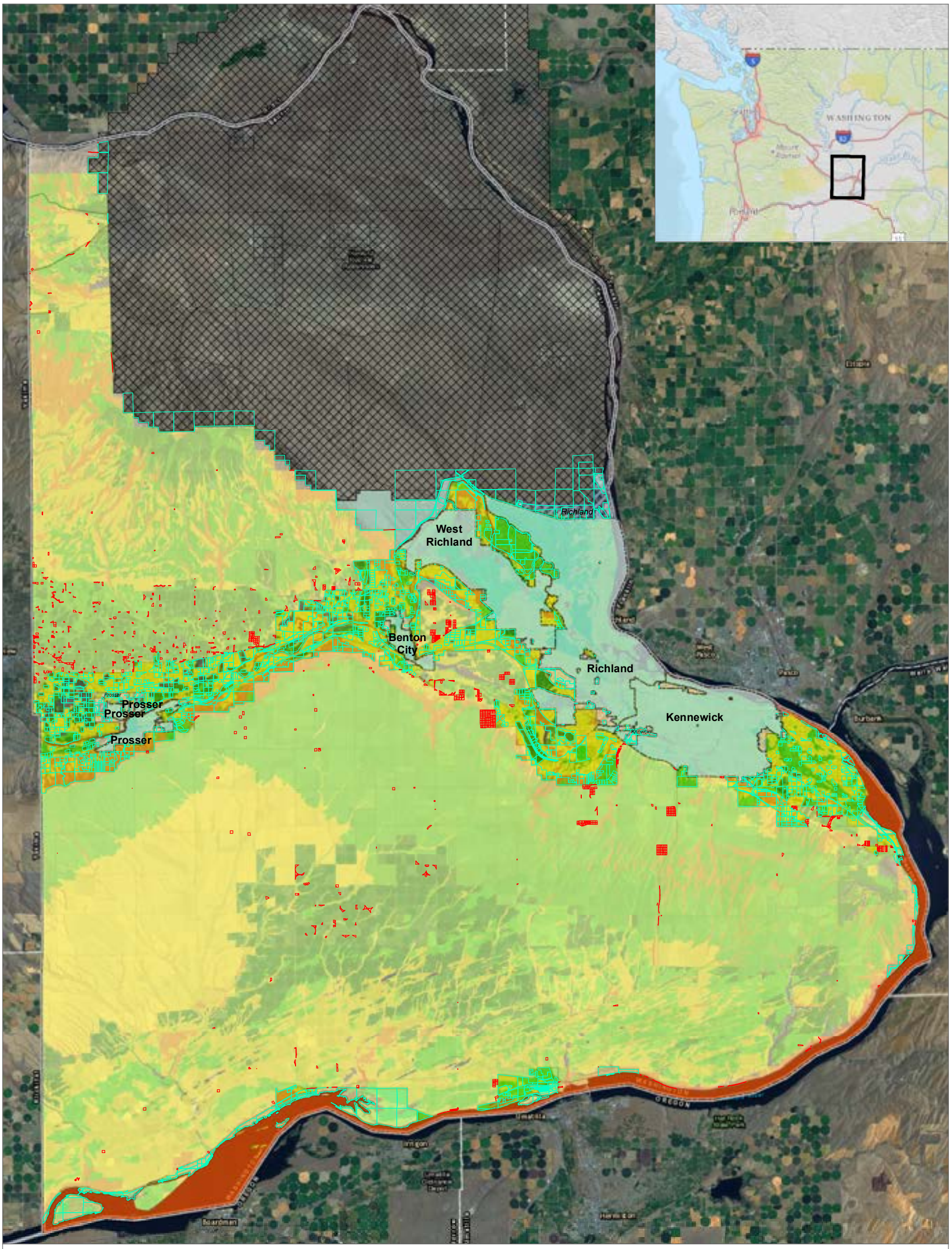


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Figure 6
Precipitation and Non-irrigated Lands Suitable for Cultivation
Benton County
Agricultural Resource Land Reclassification

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LEGEND:

- Roads
- City Limits
- UGA
- County Boundary
- Hanford Site
- Parcels below 10 acres in GMA AG
- Parcel above 10 acres not in GMA AG

Land Use (2011)

District

- PARK DISTRICT
- UGA
- GMA AG

Capability Class

- Suitable - Class 2
- Suitable - Class 3
- Suitable - Class 4
- Suitable with Management - Class 6
- Suitable with Management - Class 7
- Non-suitable - Class 8

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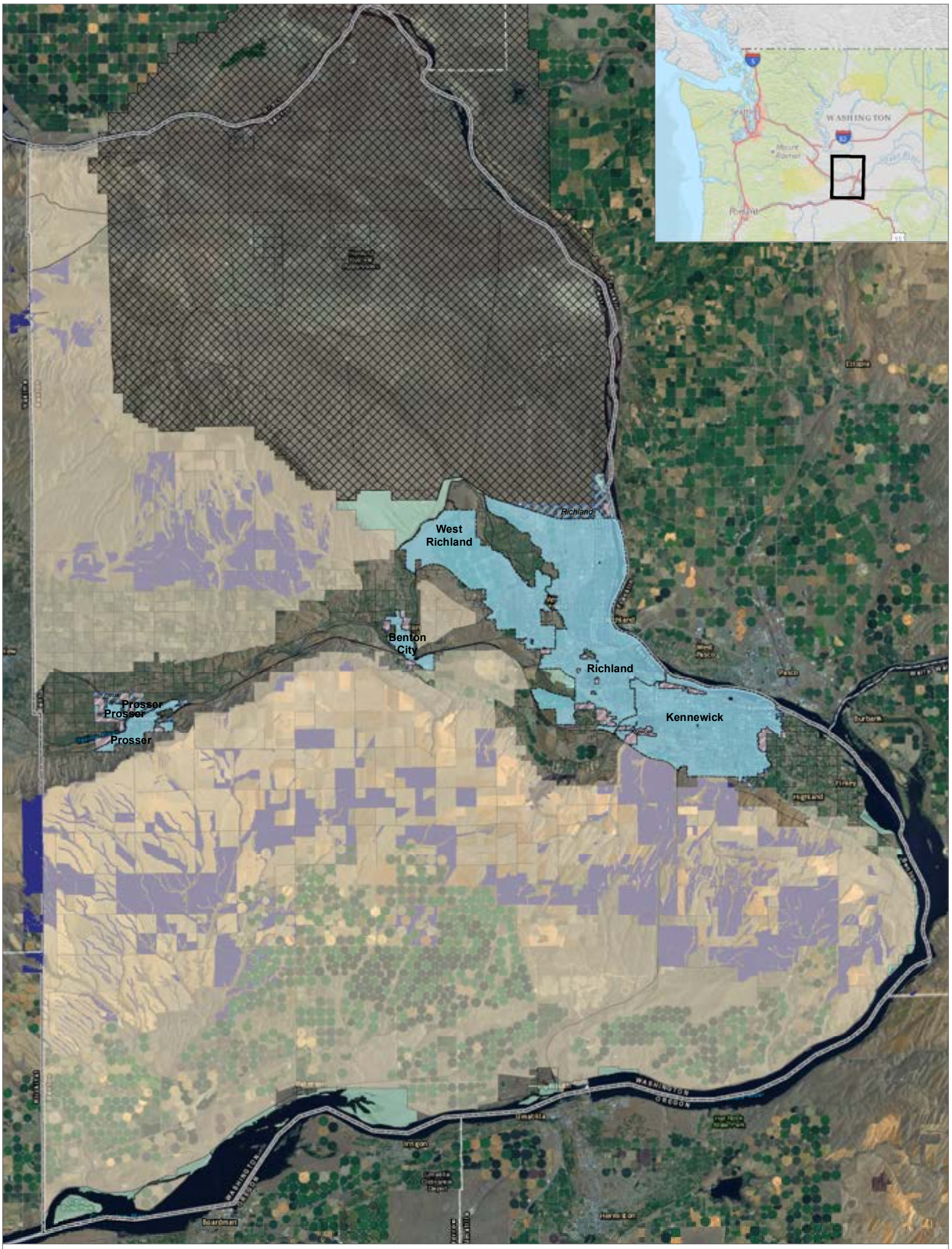
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Figure 7
Parcel Size Analysis
Benton County
Agricultural Resource Land Reclassification

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LEGEND:

- Roads
- City Limits
- UGA
- County Boundary
- Hanford Site

Crop Type

- CRP/Conservation

Land Use (2011)

District

- PARK DISTRICT
- UGA
- GMA AG

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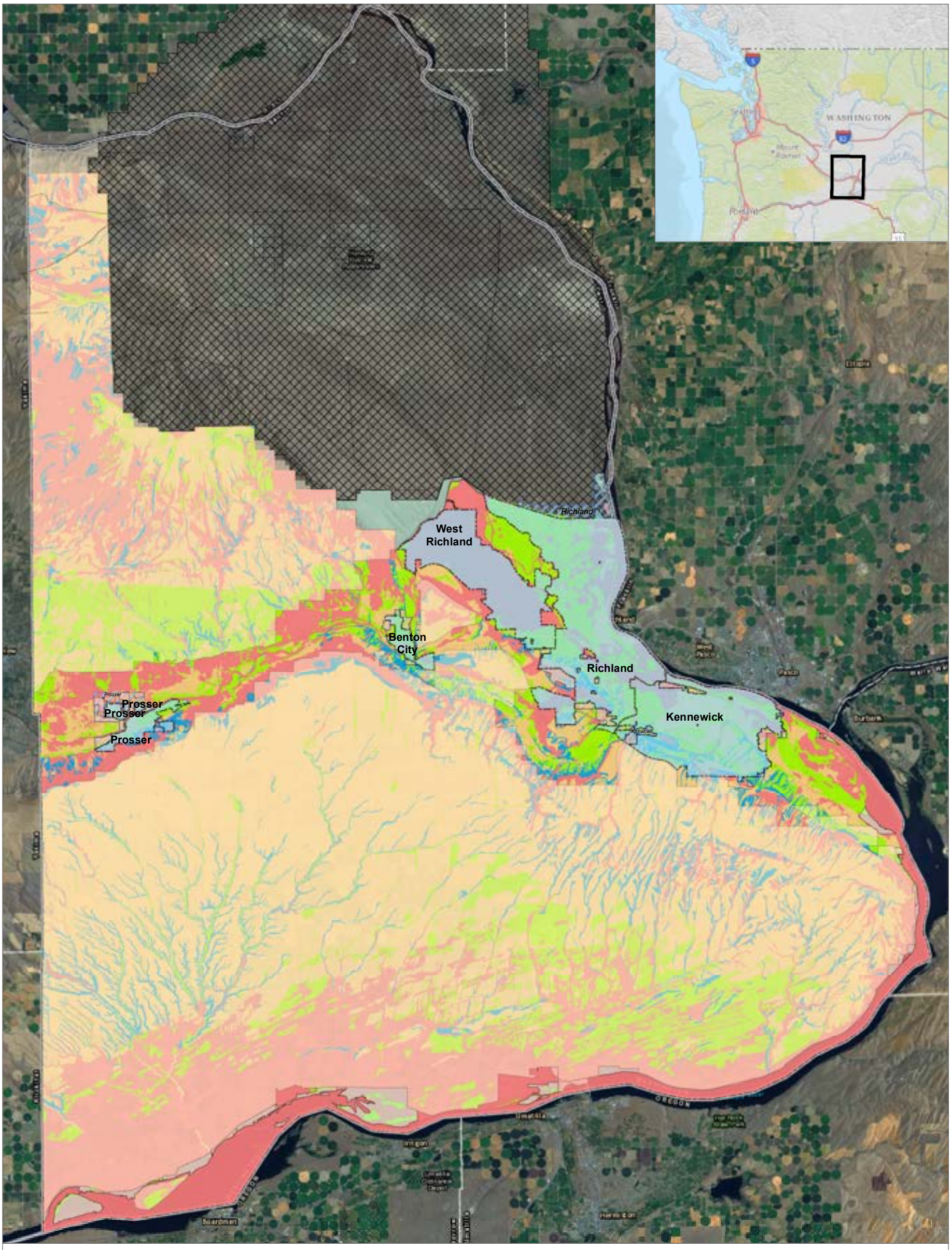
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ANCHOR QEA

Figure 8
Lands in CRP/Conservation
Benton County
Agricultural Resource Land Reclassification

DRAFT



LEGEND:

- Roads
- City Limits
- UGA
- County Boundary
- Hanford Site

Land Use (2011)

District

- PARK DISTRICT
- UGA
- GMA AG

Soils - Farmland Designation

- Farmland of statewide importance
- Farmland of unique importance
- Not prime farmland
- Prime farmland if irrigated

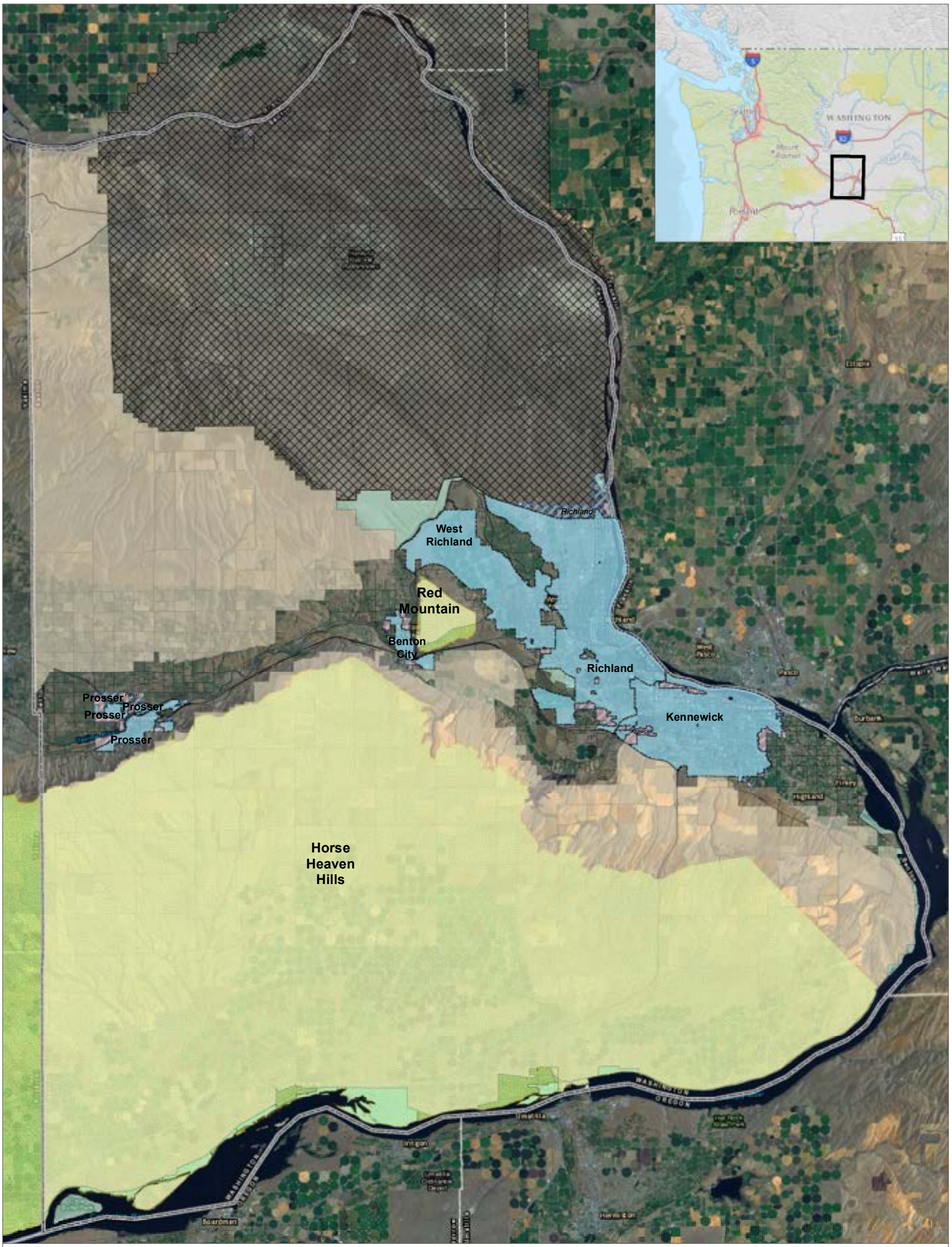
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ANCHOR QEA

Figure 9
Prime Farmland Designation
Benton County
Agricultural Resource Land Reclassification

DRAFT



LEGEND:

- Roads
- City Limits
- UGA
- County Boundary
- Hanford Site
- American Viticultural Area (AVA)

Land Use (2011)

District

- PARK DISTRICT
- UGA
- GMA AG

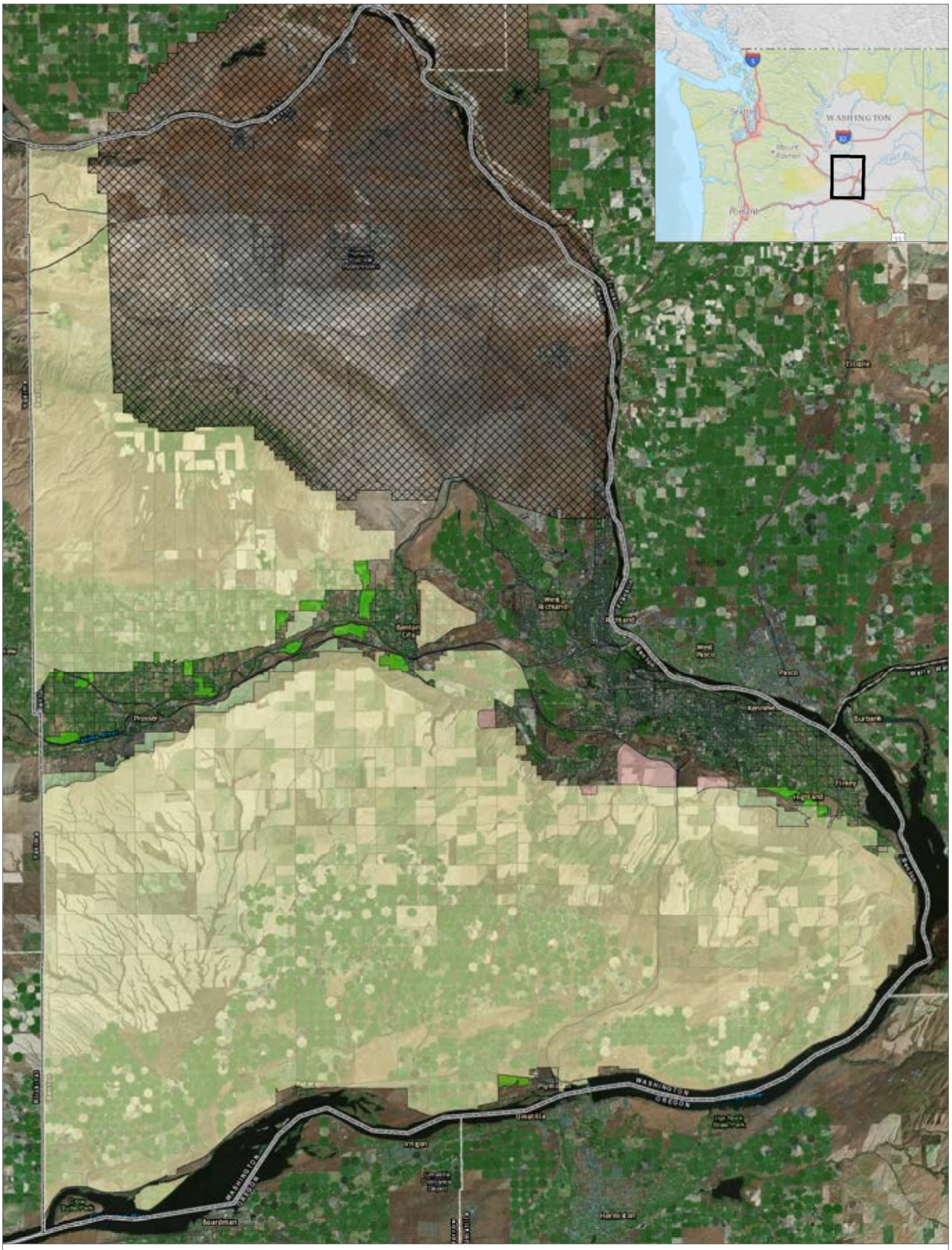
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ANCHOR QEA

Figure 10
American Viticultural Areas
Benton County
Agricultural Resource Land Reclassification

DRAFT



LEGEND:

- Roads
- County Boundary
- Hanford Site

Change to Agricultural Resource Land Designations

- Addition
- No change
- Rural Resource
- Removal

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ANCHOR QEA

Figure 11
Proposed Changes to Agricultural Resource Land Designations
Benton County
Agricultural Resource Land Reclassification

Appendix G
Addendum to Agricultural Lands Reclassification Memorandum (2025)

Draft Memorandum

To: Greg Wendt, Benton County Planning Division

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

Date: October 17, 2025

Re: Addendum to 2018 Agricultural Land Reclassification Memorandum

Purpose

This memorandum serves as an addendum to the *2018 Agricultural Resource Land Reclassification Memorandum* prepared by White Bluffs Consulting and Anchor QEA[1] during the last periodic update to the Comprehensive Plan. The 2018 memorandum provided a countywide review of designated agricultural resource lands, and recommended parcels for addition and removal from the GMA Agriculture District.

AC Geo performed a supplemental countywide review of the 2018 analysis to evaluate whether further changes are appropriate based on historical and current land use trends, including surrounding residential and industrial development and more detailed evaluation of agricultural lands on the edges of rural residential and industrially zoned lands. The evaluation criteria used in this supplemental analysis are consistent with state guidelines for designating agricultural resource lands found in WAC 365-190-050.

Methods & Screening Criteria

Under **WAC 365-190-050**, counties must conduct a **comprehensive, countywide analysis** when classifying, designating, or de-designating agricultural resource lands, applying consistent criteria that consider both soil capability and land-use context. The 2025 supplemental review relied on the same NRCS soils and land capability data used in the 2018 analysis, along with the County's current parcel dataset, recent aerial imagery, and production information provided by landowners and local planning staff. The review considered parcels located within or adjacent to the GMA Agriculture District and applied a series of screening steps to determine whether continued designation within the GMA Agriculture District is appropriate. Each screening step was applied sequentially so that only parcels meeting all criteria were carried forward.

The screening steps and the number of parcels meeting the screening criteria are listed below:

[1] Anchor QEA, *Agricultural Resource Lands Reclassification*, Appendix L, Benton County Comprehensive Plan (2018)."
https://bentoncountywa.municipalone.com//files/documents/FinalCPAppendixLFeb201812904554902071 8PM.pdf

1. **Boundary Proximity –** Parcels located along the boundary between the GMA Agriculture District and other zones were selected, with 200-foot perimeter applied to ensure selection of parcels interrupted by road, rail, and utility rights of way**. 415 parcels meet criteria.**

2. **NRCS Soils Non-Irrigated Capability Class –** This criterion identifies parcels with significant limitations to non-irrigated agricultural suitability, based on land capability class data from the Benton County Soil Survey[2]. Parcels where Non-Irrigated Soil Capability Classes 4e, 4w, 4s, 4c, or Classes 5–7 comprise 50 percent or more of the parcel area were selected. **355 parcels meet criteria.**

3. **NRCS Soils Irrigated Capability Class –** This criterion identifies parcels with significant limitations to irrigated agricultural suitability. Parcels where Irrigated Soil Capability Classes 4e, 4w, 4s, 4c, or Classes 5–7 comprise 50 percent or more of the parcel area were selected. **161 parcels meet criteria.**

4. **Farmland Classification –** Parcels where lands identified by NRCS as Prime Farmland, Farmland of Statewide Importance, or Farmland of Unique Importance comprise less than 50% of the parcel area**. 110 parcels meet criteria.**

5. **Critical Areas Exclusion –** Parcels with less than 50 percent or more of their area intersecting with mapped critical areas, including wetlands, riparian corridors, and steep slopes**. 75 parcels meet criteria.**

6. **Development Potential Review –** Desktop evaluation to assess proximity to population areas, existing development, and the potential for more intense uses of the land, consistent with WAC 365-190-050(1)(a)–(j)**.** The consultant team and County planning staff conducted two rounds of review incorporating land use information, recent industrial development trends, interviews with property owners, building permit activity, predominant lot size, and the presence of non-agricultural land uses within and adjacent to the subject parcels. **16 parcels meet all criteria and are suggested for designation change from GMA Agriculture to other uses, as these lands after the more detailed evaluation do not appear to meet the criteria of agricultural lands of long-term commercial significance.**

Conclusion & Recommendations

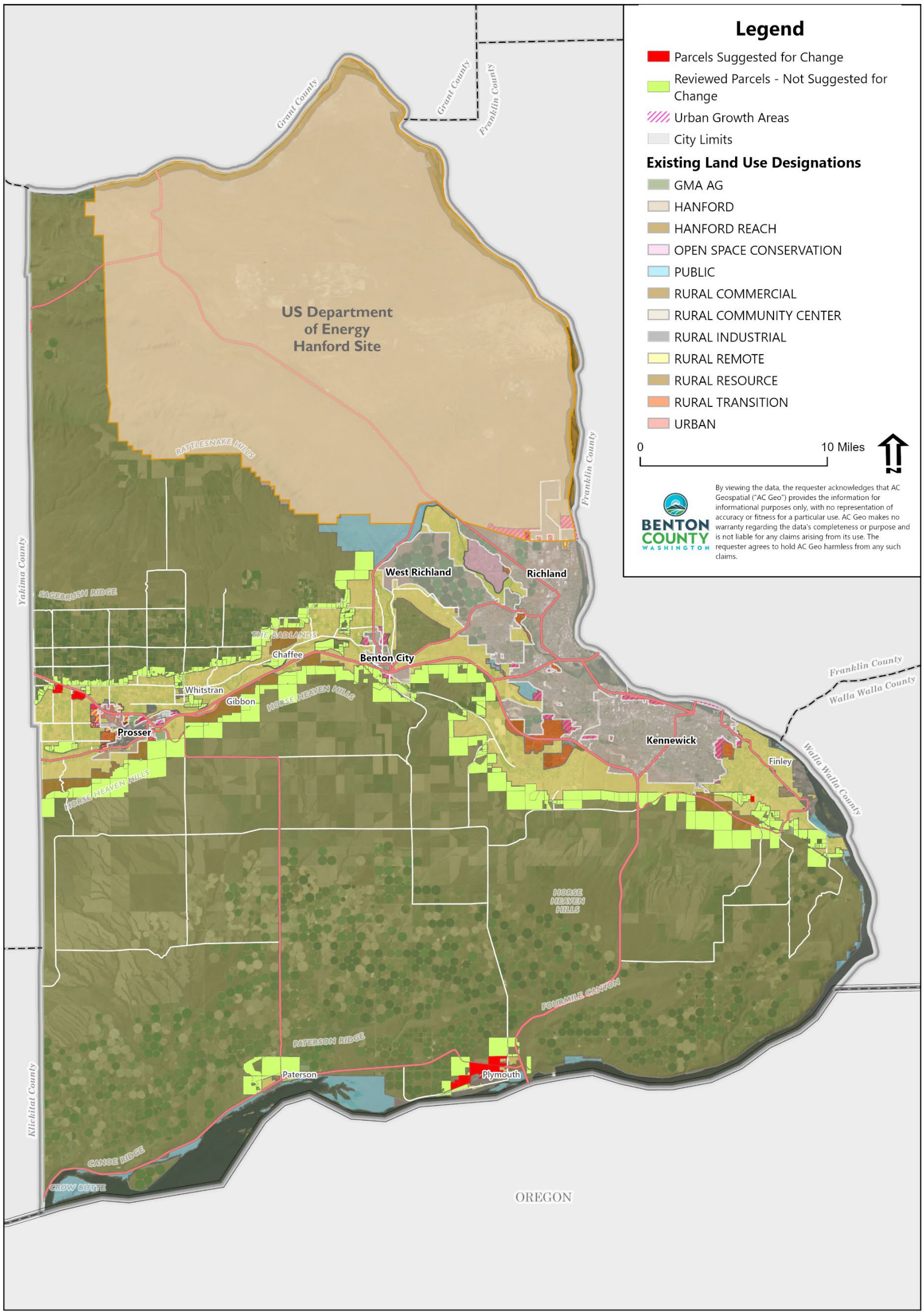
The review identified **16 parcels** currently designated GMA Agriculture where alternative designations may be more appropriate due to limited agricultural suitability and likelihood of being agricultural lands of long-term commercial significance. These parcels are recommended for re-designation to other adjacent land uses, as summarized in Table 1.

[2] Soil Survey report of Benton County Area, Washington, 1971 https://kid.org/wp-content/uploads/2022/02/wa605_text.pdf

Table 1: Suggested Agricultural Resource Land Designation Changes

Parcel ID	Acres	Suggested Designation	Reason for Change
101571000002004	357.3	Rural Industrial	Limited suitability soils, adjacent industrial growth.
111571013428001	18.3	Rural Industrial	Limited suitability soils, adjacent industrial use.
106584000005000	7.1	Rural Industrial	Limited suitability soils, railroad ROW with surrounding industrial growth.
111571000001003	150.1	Rural Industrial	Limited suitability soils, adjacent industrial growth on both sides.
106582000001002	372.7	Rural Industrial	Limited suitability soils, existing industrial land use and growth. Suggested boundary line adjustment to include south portion only.
128802000004005	25.4	Rural Remote	Limited suitability soils, surrounded by RL-5 on three sides.
128942000008000	125.7	Rural Remote	Limited suitability soils, surrounded by RL-5 and more intensive growth.
129942000001000	36.1	Rural Remote	Limited suitability soils, surrounded by RL-5 and more intensive growth.
128944000010000	3.0	Rural Remote	Limited suitability soils, surrounded by RL-5 and more intensive growth.
120943011735004	2.0	Rural Remote	Limited suitability soils, surrounded by RL-5, more intensive growth, infrastructure.
129942000010000	20.0	Rural Remote	Limited suitability soils (non-irrigated), surrounded by RL-5, more intensive growth, infrastructure. Avoids creating small, isolated pocket of ag zoning.
111572000001000	20.0	Rural Industrial	Limited suitability soils (non-irrigated), existing industrial facilities (gas plant)
129942000009001	17.6	Rural Remote	Limited suitability soils (non-irrigated), surrounded by RL-5, more intensive growth, infrastructure. Avoids creating small, isolated pocket of ag zoning.
111573000000000	72.5	Rural Industrial	Limited suitability soils. Ag use not possible due to existing industrial facilities (gas plant) on parcel.
129942000011001	15.4	Rural Remote	Limited suitability soils, surrounded by RL-5, more intensive growth, infrastructure. Avoids creating small, isolated pocket of ag zoning.
128941000008000	5.0	Rural Remote	Limited suitability soils, surrounded by RL-5, more intensive growth, infrastructure.

Figure 1: Map of Reviewed Parcels and Parcel Suggested for Change



Data Sources: Benton County GIS, Washington Department of Transportation, Washington DNR,Earthstar Geographics

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DRAFT Agricultural Resource Land Review and Suggested Changes

Benton County Comprehensive Plan

Appendix H-1
Transportation Level of Service

Appendix H2 - Benton County Road Exising (2024) and Forecast 2036 Level of Service Analysis

Site ID #	Jurisdiction	Location/ Description	Direction	Collection Start Date	Direction Split_1	Direction Split_2	Current AADT (2024) (1)	Capacity (2)	Current PM Peak Hour Volume (3)	Current Volume to Capacity Ratio	Current PM Level of Service (4)	2036 PM Peak Hour Forecast (5)	2036 Volume to Capacity Ratio	2036 PM Level of Service
1	Benton County	Bowles Rd W-O S Haney Rd	EB/WB	10/8/2024	0.507	0.493	1942	800	87	0.11	A	98	0.12	A
2	Benton County	Bowles Rd E-O S Haney Rd	EB/WB	10/8/2024	0.538	0.462	899	800	39	0.05	A	44	0.05	A
3	Benton County	Piert Rd S-O Game Farm Rd	NB/SB	10/8/2024	0.525	0.475	354	800	18	0.02	A	20	0.03	A
5	Benton County	Oak St S-O E 19th Ave	NB/SB	4/9/2024	0.498	0.502	2705	800	129	0.16	A	145	0.18	A
6	Benton County	27th Ave E-O S Oak St	EB/WB	4/9/2024	0.521	0.479	1949	800	91	0.11	A	103	0.13	A
7	Benton County	27th Ave W-O S Gum St	EB/WB	4/9/2024	0.503	0.497	5874	800	271	0.34	A	324	0.40	A
8	Benton County	Game Farm Rd W-O S Dunham Rd	EB/WB	10/8/2024	0.478	0.522	933	800	55	0.07	A	62	0.08	A
9	Benton County	19th Ave E-O S Gum St	EB/WB	4/9/2024	0.574	0.426	662	800	40	0.05	A	45	0.06	A
10	Benton County	Badger Rd S-O Wiser Pkwy	NB/SB	3/19/2024	0.492	0.508	3982	800	189	0.24	A	213	0.27	A
11	Benton County	Badger Rd W-O S 887 Pr SE	EB/WB	8/13/2024	0.506	0.494	1923	800	90	0.11	A	101	0.13	A
12	Benton County	Twin Bridges Rd N-O Weidle Rd	NB/SB	10/1/2024	0.486	0.514	3065	800	255	0.32	A	325	0.41	A
13	Benton County	Bowles Rd W-O Finley Rd	EB/WB	10/8/2024	0.497	0.503	922	800	41	0.05	A	46	0.06	A
14	Benton County	Dallas Rd S-O 210 Private Rd	NB/SB	9/17/2024	0.490	0.510	7272	800	374	0.47	A	676	0.85	D
15	Benton County	Finley Rd E-O S Lexington St	EB/WB	10/8/2024	0.485	0.515	1645	800	75	0.09	A	84	0.11	A
16	Benton County	Finley Rd W-O S Locust Ln	EB/WB	10/8/2024	0.491	0.509	745	800	37	0.05	A	41	0.05	A
17	Benton County	Finley Rd S-O E 239 PR SE	NB/SB	10/8/2024	0.492	0.508	525	800	27	0.03	A	31	0.04	A
18	Benton County	Nine Canyon Rd S-O E Cougar Rd	NB/SB	11/19/2024	0.511	0.489	1001	800	60	0.07	A	67	0.08	A
19	Benton County	Nine Canyon Rd S-O 490 PR NE	NB/SB	11/19/2024	0.521	0.479	966	800	63	0.08	A	70	0.09	A
20	Benton County	Bofer Canyon Rd S-O E Law Ln	NB/SB	12/17/2024	0.611	0.389	100	800	7	0.01	A	279	0.35	A
21	Benton County	Clodfelter Rd S-O Chevy Ln	NB/SB	3/19/2024	0.507	0.493	2122	800	97	0.12	A	110	0.14	A
22	Benton County	Clodfelter Rd N-O Locust Grove	NB/SB	8/13/2024	0.538	0.462	741	800	49	0.06	A	55	0.07	A
23	Benton County	25th Ave E-O S Yew St	EB/WB	4/9/2024	0.543	0.457	1423	800	69	0.09	A	78	0.10	A
184	Benton County	27th Ave E-O S Washington St	EB/WB	4/9/2024	0.477	0.523	5850	800	282	0.35	A	332	0.42	A
192	Benton County	19th Ave E-O S Washington St	EB/WB	4/23/2024	0.507	0.493	1446	800	65	0.08	A	113	0.14	A
559	Benton County	Kennedy Rd W-O N Sunset Rd	EB/WB	8/13/2024	0.466	0.534	2774	800	137	0.17	A	164	0.20	A
560	Benton County	Old Inland Empire Hwy E-O N Bunn Rd	EB/WB	8/13/2024	0.498	0.502	2899	800	129	0.16	A	145	0.18	A
561	Benton County	Old Inland Empire Hwy W-O N French Rd	EB/WB	8/13/2024	0.514	0.486	1752	800	94	0.12	A	105	0.13	A
562	Benton County	Old Inland Empire Hwy W-O N Case Rd	EB/WB	8/13/2024	0.477	0.523	2051	800	105	0.13	A	119	0.15	A
563	Benton County	Old Inland Empire Hwy W-O W Rayhill Rd	EB/WB	8/13/2024	0.523	0.477	1978	800	92	0.12	A	104	0.13	A
564	Benton County	Old Inland Empire Hwy E-O W Knox Rd	EB/WB	8/13/2024	0.498	0.502	2020	800	94	0.12	A	106	0.13	A
565	Benton County	Sellards Rd E-O SR 221	EB/WB	8/13/2024	0.427	0.573	1601	800	75	0.09	A	85	0.11	A
566	Benton County	Sellards Rd W-O S Travis Rd	EB/WB	8/13/2024	0.441	0.559	1610	800	70	0.09	A	79	0.10	A
567	Benton County	Plymouth Rd N-O SR 14	NB/SB	8/13/2024	0.579	0.421	1739	800	99	0.12	A	112	0.14	A
568	Benton County	Christy Rd W-O S Plymouth Rd	EB/WB	8/27/2024	0.486	0.514	368	800	16	0.02	A	18	0.02	A
569	Benton County	Webber Canyon Rd S-O Badger Rd	NB/SB	8/13/2024	0.517	0.483	1342	800	57	0.07	A	65	0.08	A
570	Benton County	Webber Canyon Rd N-O Badger Rd	NB/SB	8/13/2024	0.496	0.504	1887	800	81	0.10	A	91	0.11	A
571	Benton County	Travis Rd N-O Sellards Rd	NB/SB	8/13/2024	0.489	0.511	1119	800	50	0.06	A	56	0.07	A
572	Benton County	Travis Rd N-O Cemetry Rd	NB/SB	8/13/2024	0.530	0.470	1310	800	54	0.07	A	60	0.08	A
573	Benton County	Grant Ave S-O Old Inland Empire Hwy	NB/SB	8/13/2024	0.467	0.533	4006	800	178	0.22	A	201	0.25	A
574	Benton County	Mckinley Falls Rd S-O Horrigan Rd	NB/SB	8/13/2024	0.490	0.510	222	800	12	0.02	A	14	0.02	A
575	Benton County	Bennett Ave E-O Richards Rd	EB/WB	8/13/2024	0.496	0.504	996	800	40	0.05	A	45	0.06	A
576	Benton County	Johnson Rd E-O N Gap Rd	EB/WB	8/13/2024	0.496	0.504	2574	800	116	0.15	A	131	0.16	A
577	Benton County	Wine Country Rd W-O N Griffin Rd	EB/WB	8/13/2024	0.522	0.478	5028	800	222	0.28	A	251	0.31	A
578	Benton County	Wine Country Rd N-O S Missimer Rd	NB/SB	8/13/2024	0.477	0.523	3766	800	168	0.21	A	189	0.24	A

579	Benton County	Old Inland Empire Hwy W-O S Wilgus Rd	EB/WB	8/13/2024	0.488	0.512	1801	800	84	0.10	A	95	0.12	A
685	Benton County	Piert Rd N-O E Lechelt Rd	NB/SB	10/8/2024	0.512	0.488	374	800	19	0.02	A	22	0.03	A
696	Benton County	Twin Bridges Rd N-O N Harrington Rd	NB/SB	9/10/2024	0.497	0.503	3146	800	231	0.29	A	303	0.38	A
710	Benton County	Kennedy Rd W-O City Limits	EB/WB	9/17/2024	0.460	0.540	2858	800	135	0.17	A	162	0.20	A

Notes:

(1) Current AADT (Annual Average Daily Traffic Volumes) were obtained from the Benton Franklin Council of Governments regional traffic model, most current available, representing 2024.

(2) Capacities were obtained from the Benton Franklin Council of Governments regional traffic model.

(3) Current PM peak hour traffic volumes were obtained from the Benton Franklin Council of Governments regional traffic model.

(4) Current LOS calculated as volume to capacity ranges: A < 0.60, B = 0.60 - 0.70, C = 0.70 - 0.80, D = 0.80 - 0.90, E = 0.90 - 1.0, F > 1.00.

(5) The 2036 PM peak hour volume forecast used two methodologies: (1) for roadway segments included in the Benton Franklin Council of Governments regional traffic model, PM peak hour volumes were estimated using both the model-based growth from 2019 to 2045 (interpolated to 2036) and observed growth from 2016 to 2023, with the higher of the two results selected; and (2) for roadway segments outside the regional model, the 2036 PM peak hour volumes were estimated using a growth rate based on observed traffic growth from 2016 to 2023. When the growth rate from 2016 to 2023 was observed to be negative, a growth rate of 1% was assumed.

Appendix H-2
Washington State Highway Inventory Within Benton County

Appendix H-3 - Washington State Highway Inventory within Benton County

Washington State Highway Route Mileage and Description

SR #	Beginning	Ending	Route Miles	Description
I-82	Yakima Co. Line West of Prosser	Oregon State Line at Umatilla	57.23	I-82 is a freeway extending from I-90 near Ellensburg,Washington, to I-84 near Hermiston, Oregon
I-182	Jct. I-82 West of the Tri-Cities	Franklin Co. Line at Columbia River	6.04	I-182 is a 16-mile interstate spur route from I-82 west of the Tri-Cities to US 395, SR 397 and US 12 in Pasco
US 395	Jct. I-82 South of Kennewick	Franklin Co. Line at the Blue Bridge	5.88	US 395 is a Highway of National Significance, extending from Mexico to Canada via eastern Washington. Within the RTP, the road extends from Umatilla, Oregon to the Adams County Line.
SR 14	Klickitat Co. Line	Jct. I-82 at Plymouth	28.53	SR 14 is an east-west route along the Columbia River from Vancouver to Plymouth in Benton County south of the Tri-Cities. This route provides a two-lane alternative to I-84 on the Oregon side of the river.
SR 22	Yakima Co. Line West of Prosser	Jct. I-82 at at East Prosser	6.76	SR 22 from Toppenish (SR 97) to Prosser (I-82) primarily serves local needs. Less than seven miles are in Benton County. Some truck traffic uitilizes this route in lieu of I-82.
SR 24	Yakima Co. Line West of Hanford West Gate	Grant Co. Line at Vernita Bridge	12.8	SR 24 extends from Yakima to SR 26 at Othello. A primary function of this route is access to the west gate of the Hanford site at the SR 24/SR 240 Junction.
SR 221	Jct. SR 14 at Paterson	Jct. SR 22 at Prosser	25.95	SR 221 is a 26-mile local farm route from SR 22 at Prosser to SR 14 at Paterson, but attracts through traffic as well.
SR 224	Jct. I-82 at Kiona	Jct. SR 240 at Richland	10.18	SR 224 provides a 10-mile connection, from I-82 (Kiona/Benton City) through West Richland to Richland (SR 240). Traffic on this route is oriented to Richland and Hanford work sites and local freight movements.
SR 225	Jct. SR 224 at Kiona	Jct. SR 240 at Horn Rapids	11.32	SR 225 extends from Kiona (I-82) through Benton City to SR 240 at Horn Rapids. DOE Route 10 extends on into the Hanford reservation. Hanford commuters dominate peak volumes on this two-lane roadway.
SR 240	Jct. SR 24 at Hanford West Gate	Jct. US 395 at Kennewick	40.22	SR 240 extends from SR 24 at the Hanford west gate to Richland and Kennewick (to a junction with US 395), a distance of 40 miles. In conjunction with SR 24 to Yakima and SR 243 north to SR 90 at Vantage, SR 240 carries regional traffic, including freight movements. It also serves as the primary route of the daily Hanford work-commute.
SR 397	I-82/Locust Road Interchange	I-182/US 395 Interchange	22.31	SR 397 extends from I-82 at Locust Grove interchange (exit 114) to the Finley area, then to Kennewick, across the Columbia River, and through East Pasco to the I-182/US 395 interchange. This route serves as freight access to the Port of Pasco, the Port of Kennewick and other industrial sites along the river.

Appendix H-3
Washington State Highway Build-Out of Benton County Comprehensive Land Use Assumptions – 2036 AADT

Appendix H-4 - Washington State Highway Inventory within Benton County - and 2036 Forecast and Level of Service Analysis

SR #	Begin MilePost	End MilePost	Description From/To	WSDOT ID	Collection Year	Functional Class	HSS	Lanes Inc.	Lanes Dec.	Legal Speed	Current AADT (2023) (1)	K%	D%	PHV	Comments	Capacity (2)	Current PM Peak Hour Volume (3)	Current Volume to Capacity Ratio	Current Level of Service (4)	2036 PM Peak Hour Forecast (5)	2036 Volume to Capacity Ratio	2036 PM Level of Service
14	155.00	157.32	Sonova Rd to Canoe Rd	CS04595	2023	Rural Minor Arterial		1	1	65	1236	10%	68%			1300	84	0.06	A	96	0.07	A
14	166.04	167.25	593 PR Rd - SR 221	CS04826	2023	Rural Minor Arterial		1	1	65	1868	11%	76%			1300	156	0.12	A	178	0.14	A
14	167.25	178.90	SR 221 - Plymouth Industrial Rd	CS00987	2023	Rural Minor Arterial		1	1	65	2814	11%	74%			1300	229	0.18	A	261	0.20	A
14	178.90	179.96	Plymouth Ind. Rd - Plymouth Rd	CS09081	2023	Rural Minor Arterial		1	1	65	3524	11%	82%			1300	318	0.24	A	362	0.28	A
14	179.96	180.77	Plymouth Rd - I-82	CS07182	2023	Rural Minor Arterial		1	1	55	4063	11%	74%			1300	331	0.25	A	377	0.29	A
22	29.76	33.20	Benton County line to Prosser	CS11595	2023	Rural Major Collector		1	1	60	1840	11%	55%	190		1300	190	0.15	A	216	0.17	A
22	33.20	36.52	Prosser to I-82	CS07726, CS09070	2023	Urban Minor coll/art		1	1	45-55	2198-7704		80%		Prosser UGA							
24	30.76	35.44	Benton County Line to Cold Creek Rd	CS06920	2023	Rural Minor Arterial		1	1	65	3478	13%	80%	427		1300	427	0.33	A	492	0.38	A
24	35.44	38.71	Cold Creek Rd - SR 240	CS10154	2021	Rural Minor Arterial		1	1	65	3699	10%	66%			1300	244	0.19	A	287	0.22	A
24	38.71	42.26	SR 240 - Int Midway Substation Rd	CS11768	2023	Rural Minor Arterial		1	1	60	5376	9%	64%	489		1300	489	0.38	A	592	0.46	A
24	42.23	43.79	SR 240 - Columbia River	S612	2023	Rural Minor Arterial		1	1	60	5506	11%	62%	528		1300	528	0.41	A	645	0.50	A
82	75.37	79.93	Benton County Line - Gap Road	CS11493	2023	Urban Interstate	Y	2	2	70	25741					3600	1696	0.47	A	2262	0.63	B
82	79.93	82.34	Gap Road - SR 22	CS10926	2023	Urban Interstate	Y	2	2	70	22422					3600	1478	0.41	A	1961	0.54	A
82	82.34	88.55	SR 22 - Gibbon Rd	CS00220	2023	Rural Interstate	Y	2	2	70	23874					3600	1573	0.44	A	2102	0.58	A
82	88.55	93.61	Gibbon Rd - Yakitat Rd	CS07679	2023	Rural Interstate	Y	2	2	70	23699					3600	1562	0.43	A	2082	0.58	A
82	93.61	96.58	Yakitat Rd - SR 224/Webber Canyon	CS08986	2023	Rural Interstate	Y	2	2	70	24278					3600	1600	0.44	A	2160	0.60	A
82	96.58	102.84	SR 224/Webber Canyon - I-182	CS05674	2023	Urban Interstate	Y	2	2	70	28349					3600	1868	0.52	A	2475	0.69	B
82	102.84	104.52	I-182 - Dallas Rd	CS03549	2023	Urban Interstate	Y	2	2	70	14896	10%	66%	1615		3600	1615	0.45	A	2207	0.61	B
82	104.52	109.01	Dallas Rd - Clearwater/Badger Rd	CS05035	2023	Urban Interstate	Y	2	2	70	14348					3600	946	0.26	A	1398	0.39	A
82	109.01	112.79	Clearwater/ Badger Rd - US 395	CS01991	2023	Urban Interstate	Y	2	2	70	16687					3600	1100	0.31	A	1627	0.45	A
82	112.79	114.39	US 395 - Locust Grove/SR 397	CS08593	2023	Rural Interstate	Y	2	2	70	23853					3600	1572	0.44	A	2129	0.59	A
82	114.39	122.73	Locust Grove/SR 397 - Coffin Rd	P09	2023	Rural Interstate	Y	2	2	70	22614	10%	66%	2017		3600	2017	0.56	A	2635	0.73	C
82	122.73	131.58	Coffin Rd - SR 14	CS10071	2023	Rural Interstate	Y	2	2	70	22645					3600	1492	0.41	A	1950	0.54	A
82	131.58	132.60	SR 14 - Columbia River	CS10385	2023	Rural Interstate	Y	2	2	65	25539			1781		3600	1781	0.49	A	2367	0.66	B
182	0.00	2.93	I-82 - Queensgate Dr	CS02878	2023	Urban Interstate	Y	1	1	70	27508	10%	54%	1532		3400	1532	0.45	A	2112	0.62	B
182	2.93	6.04	Queensgate Dr - Columbia River			Urban Interstate	Y	2-3	2-3	70	61000-76000				Richland UGA							
221	0.00	0.14	SR 14 - Patterson Ave	CS07508	2023	Rural Minor Arterial		1	1	50	2188	11%	55%	229		1300	229	0.18	A	261	0.20	A
221	0.14	11.56	Patterson Ave - Dowd Rd	P17	2023	Rural Minor Arterial		1	1	65	2186	13%	74%	242		1300	242	0.19	A	275	0.21	A
221	18.79	20.30	Perult Rd - Davis Rd	CS02392	2023	Rural Minor Arterial		1	1	65	2059	8%	89%			1300	147	0.11	A	167	0.13	A
221	20.30	25.77	Davis Rd - Sales Yard Rd	CS10376	2023	Rural Minor Arterial		1	1	65	2577	8%	82%			1300	169	0.13	A	189	0.15	A
224	0.00	0.24	SR 225 - Kennedy Rd	CS10894	2023	Rural Major Collector		1	1	55	6216	9%	50%	607		1300	607	0.47	A	730	0.56	A
224	0.24	0.37	Kennedy Rd - DeMoss Rd	CS05423	2023	Rural Major Collector		1	1	55	4000	10%	53%	503		1300	503	0.39	A	587	0.45	A
224	2.87	4.24	Antinori Rd - Red Mtn Rd	CS07148	2023	Rural Major Collector		1	1	55	3287	11%	57%	348		1300	348	0.27	A	431	0.33	A
224	4.24	7.67	Red Mtn Rd - SR 240	CS04895, CS11785	2023	Urban Minor Arterial		1-2	1-2	35-55	4193-18466				W Richland UGA							
225	0.00	3.00	I-82 - Corral Creek Road	CS10260, CS09149	2023	Rural Major Collector		1	1	25-40	3834-10845				Benton City UGA							
225	4.01	4.71	Acord Rd - Hanlen Rd	CS10943	2023	Rural Major Collector		1	1	40	1616	18%	85%	262		850	262	0.31	A	298	0.35	A
225	10.56	11.32	Horn Rapids Park - SR 240	CS11699	2023	Rural Major Collector		1	1	50	1615	17%	92%	247		850	247	0.29	A	281	0.33	A
240	0.00	7.95	SR 24 - Beloit Rd	CS03701	2023	Rural Minor Arterial		1	1	65	2968	12%	60%	329		1300	329	0.25	A	390	0.30	A
240	7.95	20.48	Beloit Rd - SR 225	CS09132	2023	Rural Minor Arterial		1	1	65	4639	17%	95%	782		1300	782	0.60	B	963	0.74	C
240	20.48	21.93	SR 225 - Snively Rd	CS08236	2023	Rural Minor Arterial		1	1	55	6180	19%	95%	819		1200	819	0.68	B	1030	0.86	D
240	21.93	43.17	Snively Rd - US 395	CS10501, R062W	2023	Urban Other	Y	1-3	1-3	55-60	6480-78992				Rich/Kenn UGA							
241	22.87	25.18	Benton County Line to SR 24	CS10242	2023	Rural Minor Collector		1	1	55	1552	16%	91%			1300	226	0.17	A	257	0.20	A
395	13.05	18.93	I-182 - Columbia River	CS12558, CS05934	2023	Urban Other	Y	2	2	35-55	18108-50279				Kennewick UGA							
397	0	7.23	I-82 - Nine Canyon Rd	CS09979	2023	Urban Minor Arterial		1	1	60	2473	10%	67%			1200	166	0.14	A	388	0.32	A
397	7.23	10.44	Nine Canyon Rd - Piert Rd	CS04425	2023	Urban Minor Arterial		1	1	60	926	10%	60%			1200	56	0.05	A	65	0.05	A
397	10.44	11.12	Piert Rd - Piert Rd	CS07526	2023	Urban Minor Arterial		1	1	45	1190	9%	56%			1200	60	0.05	A	68	0.06	A
397	11.12	11.68	Piert Rd - Lechelt Rd	CS12008	2023	Urban Major Collector		1	1	50	1322	10%	51%			850	67	0.08	A	76	0.09	A
397	12.06	12.35	Game Farm Rd - Finley Rd	CS12209	2023	Urban Major Collector		1	1	50	2076	9%	51%			850	95	0.11	A	108	0.13	A
397	12.35	12.79	Finley Rd - Cochran Rd	CS11420	2023	Urban Major Collector		1	1	50	3525	9%	51%			850	162	0.19	A	188	0.22	A
397	13.46	13.89	Bowles Rd - Haney Rd	CS04319	2023	Urban Major Collector		1	1	50	7101	9%	52%			800	332	0.42	A	418	0.52	A
397	13.89	14.25	Haney Rd - Perkins Rd	CS01859	2023	Urban Major Collector		1	1	50	8187	8%	54%			800	354	0.44	A	447	0.56	A

397	14.25	15.78	Perkins Rd - Finley Rd	CS10345	2023	Urban Major Collector		1	1	50	9356	8%	62%			800	464	0.58	A	583	0.73	C
397	15.78	16.25	Finley Rd - Yew St	CS07558	2023	Urban Major Collector		1	1	50	12136	8%	60%			800	583	0.73	C	692	0.87	D
397	16.66	18.69	10th Ave - Columbia River	CS05379, CS03611	2023	Urban Major Collector		2	2	35-40	11504-18337				Kennewick UGA							

Notes:

(1) Current AADT (Annual Average Daily Traffic Volumes) were obtained from the Washington State Department of Transportation Annual Traffic Report, most current available, representing 2023.

(2) Capacities were obtained from the Benton Franklin Council of Governments regional traffic model within the Metropolitan Transportation Planning Area. Capacities outside the model area were estimated from similar facility types within the model area.

(3) Current PM peak hour traffic volumes were obtained from the Washington State Department of Transportation Traffic Data System Portal where available. When only AADT was available it was multiplied by 10% to approximate the peak hour volume, and then the peak hour volume was multiplied by 65% to estimate the volume in the peak direction.

(4) Current LOS calculated as volume to capacity ranges: A < 0.60, B = 0.60 - 0.70, C = 0.70 - 0.80, D = 0.80 - 0.90, E = 0.90 - 1.0, F > 1.00.

(5) The 2036 PM peak hour volume forecast used two methodologies: (1) for roadway segments included in the Benton Franklin Council of Governments regional traffic model, PM peak hour volumes were estimated using both the model-based growth from 2019 to 2045 (interpolated to 2036) and observed growth from 2016 to 2023, with the higher of the two results selected; and (2) for roadway segments outside the regional model, the 2036 PM peak hour volumes were estimated using a growth rate based on observed traffic growth from 2016 to 2023. When the growth rate from 2016 to 2023 was less than 1% per year, a growth rate of 1% per year was used.

Appendix I
Industrial Lands Inventory Memorandum

Final Draft Memorandum

To: Greg Wendt, Benton County Planning Division

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

Date: October 17, 2025, Update October 23, 2026

Re: Industrial Lands Inventory

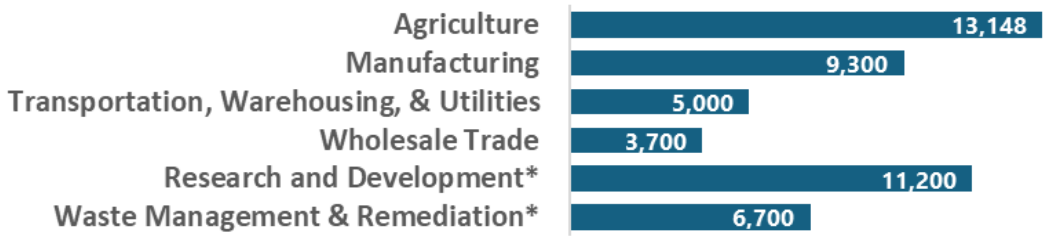
Introduction

Benton County is amending its Comprehensive Plan through a 2026 Periodic Update. Part of the update includes a review of industrial land uses and zoning designations. This memorandum provides an inventory of industrial zoned lands in Benton County and adjacent areas and examines relevant trends in industrial land use. This will inform Benton County as it updates its Comprehensive Plan, and the findings may be incorporated into the Goals and Policies, Land Use, and Rural elements of the plan and County development regulations, as applicable.

Regional Context

Industrial lands are an essential part of the economic landscape in Benton County and the greater Tri-Cities area. Industrial land use in the area centers around agriculture, manufacturing, warehousing, transportation, and energy production. Additional specialized and emerging sectors include scientific research and development, hazardous waste remediation, energy generation, and data centers. Figure 1 presents a summary of economic sectors related to industrial use and their approximate employment levels.

Figure 1: Major Industrial Sectors by Number of Employees, Benton & Franklin Counties



Notes: *Sectors with specialized industrial use associated with the Hanford site.
Sources: Washington State Employment Security Department, 2025. U.S. Census Bureau, 2022

Agriculture is a core part of the regional economy and is supported by significant agricultural-related industrial activity, including the storage, processing, packaging, and transport of food and beverages as well as various input products such as fertilizer and agrichemicals. The Tri-Cities is also a major transportation and logistics hub, with access to highways, major rail service, barge

transportation, and air freight service. Port districts, including the ports of Benton, Kennewick, and Pasco, support various infrastructure and industrial development efforts. The U.S. Department of Energy's Hanford site has specialized industrial uses including hazardous waste treatment, scientific research, and energy production. Across the Columbia River in Oregon, major industrial centers exist in Umatilla, Hermiston, and Boardman. Industrial development in these areas is characterized by data centers, food processing, and logistics facilities.[1]

Industrial Development Trends

Warehousing and transportation facilities are a driver of industrial land use in the region and may be accelerated by demand for e-commerce distribution facilities. Industrial land use is also increasingly shaped by advanced technology and energy infrastructure needs. High-performance computing and artificial intelligence are driving demand for data centers and large-scale, utility-served industrial sites with reliable power supplies.[2] These facilities are frequently sited near major power transmission corridors and substations.



Amazon data center in Umatilla County, Oregon, 2025

There is also increasing interest in utility-scale renewable energy projects and associated storage and transmission facilities. These industrial development patterns require significant land area and access to robust and scalable energy infrastructure. Another trend, particularly on city and port-owned properties, is the development of large scale, master planned business/industrial parks that provide utilities, multi-use industrial space, and transportation access to attract industrial businesses.[3] Across the unincorporated areas of Benton County, industrial-scale agricultural facilities such as wineries, warehouses, and various value-added processing facilities have been developed. These are dispersed across the landscape as well as concentrated at transport hubs.

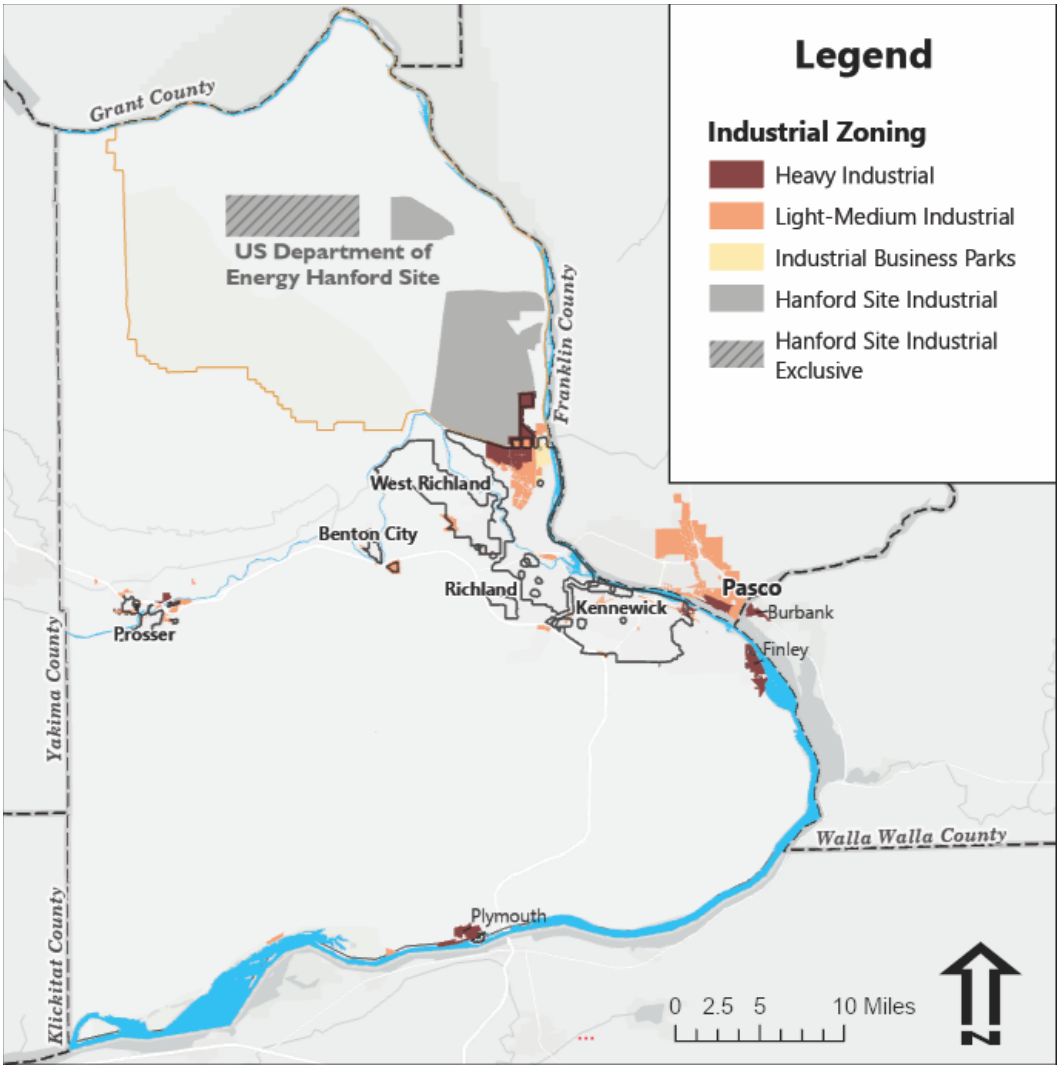
[1] U.S. Census Bureau County Business Patterns, 2022
[2] US Department of Energy Request for Information on Artificial Intelligence Infrastructure
[3] Port of Benton, *Rail Intermodal Facility Projects*, 2025

Industrial Zoned Land Inventory

An inventory of industrial zoned lands was conducted to evaluate industrial land use designations in Benton County and neighboring areas, including Pasco and Burbank. This regional approach reflects the economic and transportation linkages across jurisdictional boundaries. The analysis included the following areas:

- Unincorporated Benton County
- Kennewick
- Richland
- West Richland
- Benton City
- Prosser
- Pasco
- Burbank Urban Growth Area (UGA)

Figure 1: Study Area Overview & Industrial Zoned Lands Map



Inventory Methodology

The analysis combined zoning and parcel data from each jurisdiction to map the extent of industrial zoned lands. Industrial zoned parcels were categorized as "developed," "underdeveloped," or "vacant" based on building footprints and tax assessment data.[4] Developed parcels were those with >5% lot coverage, underutilized parcels had <5% lot coverage, and vacant parcels had no buildings or improvement value. Desktop Quality Control ("QC") was performed on 20% of the dataset and found that the original classification was correct on 85% of reviewed parcels. Incorrectly classified parcels were corrected following the QC assessment. After classification, the parcels were segmented further based on public or private ownership, intersection with critical areas, and proximity to major transportation infrastructure.

Summary of Industrial Zoned Lands

The inventory identified approximately 67,028 acres of industrial zoned lands across the study area, including 9,335 acres of privately owned vacant or underutilized lands. The Hanford site accounts for a large portion of potential industrial lands, with 46,682 acres designated for specialized industrial uses related to energy production, research, and environmental remediation consistent with the Hanford Comprehensive Land Use Plan (CLUP). Outside of Hanford, the largest concentrations of industrial lands occur in the cities of Richland, Pasco, and unincorporated Benton County. The acres of industrial zoned land in each jurisdiction are summarized in Table 1.

Table 1: Industrial Zoned Lands by Jurisdiction

Jurisdiction	Developed	Underutilized	Vacant	Public	Total
Unincorporated Benton County	531	524	1,562	770	3,387
Kennewick	362	63	203	31	659
Richland	1,080	742	1,655	3,383	6,860
West Richland	45	224	187	0	456
Benton City	21	22	287	58	387
Prosser	158	44	110	140	453
Pasco	2,596	70	3,371	1,962	7,999
Burbank UGA	69		271		340
Subtotal	**4,862**	**1,689**	**7,645**	**6,344**	**20,541**
Hanford Site				46,486	46,486
Total	**4,862**	**1,689**	**7,645**	**52,831**	**67,028**

Notes:

1. Lands within the US Department of Energy's Hanford site only support specialized industrial uses and are considered separately.
2. Airports in Pasco and Prosser are a significant portion of the identified "Public" industrial lands

[4] Parcel improvement values were derived from the Benton County parcel layer. Building footprints were obtained from the Microsoft Planetary Computer global building footprint dataset, 2024.

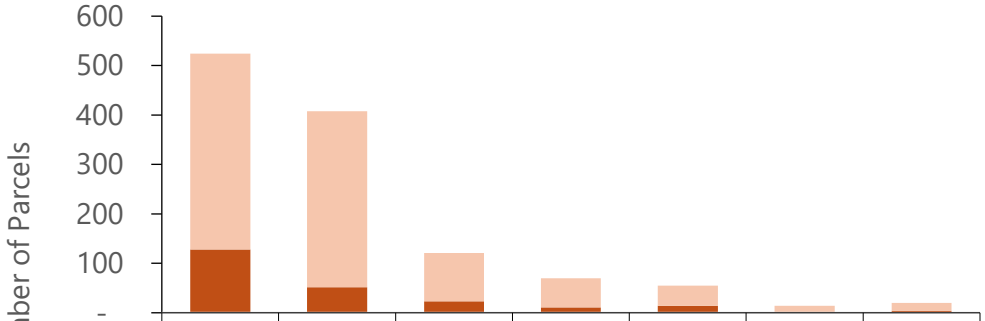
Significant industrial lands exist within the unincorporated areas of Benton County and several of the incorporated cities. Richland has approximately 6,860 acres of industrial zoned land, with large acreages in both public and private ownership. The North Horn Rapids Industrial Park (Northwest Advanced Clean Energy Park) encompasses 1,641 acres of land specifically master planned and zoned for large industrial users in the clean energy field.'The clean energy park borders regional transportation routes, railroads, and barge facilities, and has utilities at the site boundary (City of Richland, 2025).

Pasco contains approximately 8,000 acres of industrial zoned land that serves as a major center for warehousing, food processing, and transportation industries. There are several parcels in Pasco over 100 acres within the "Light Industrial" zone that are currently under agricultural use. The Tri-Cities airport accounts for most of the public exempt industrial lands in Pasco. Smaller industrial land bases are present in Kennewick (659 acres), West Richland (456 acres), Benton City (387 acres), Prosser (453 acres), and the Burbank Urban Growth Area (340 acres). Industrial lands within these jurisdictions support light manufacturing activities and local agricultural activities.

Parcel Size Assessment

The average building footprint size on developed industrial parcels was 22,715 ft^2 and the average parcel size was 322,000 ft^2 (7.4 acres), giving an average lot coverage of 7.4%. To assess the available land for future industrial development, the size of privately owned vacant and underdeveloped parcels in industrial zones were summarized. Figure 2 shows the distribution of parcel sizes on privately-owned parcels in industrial zones.

Figure 2: Number of Parcels by Size Category in Private Ownership



	<1 acre	1-5 acres	5-10 acres	10-20 acres	20-50 acres	50-100 acres	100+ acres
Vacant	396	356	98	59	41	13	16
Underutilized	128	52	23	11	14	1	4

Of the privately owned vacant and underutilized parcels, 76% are 5 acres or less. However, there are a range of available parcel sizes, and most jurisdictions have at least one large parcel over 100 acres, including Unincorporated Benton County (6), Richland (5), West Richland (1), Benton City

(1), Pasco (6), and Burbank (1). There are a significant number of large acreage parcels, particularly within and adjacent to the Hanford Site that are owned by the U.S. Department of Energy. These sites offer potential for specialized development through public/private partnerships and economic development initiatives. Examples include the US Department of Energy's AI infrastructure initiatives at the Pacific Northwest National Laboratory[5] and Port of Benton's planned intermodal transport facility,[6] both of which are planned on publicly owned industrial lands in north Richland.

Development Constraints

Parcels were classified into three suitability tiers – "Tier 1," "Tier 2," and "Constrained" - based on their size, proximity to transportation infrastructure, and intersection with critical areas. Tier 1 included parcels over 5 acres that have no significant development constraints from critical areas and are within ½ mile of major transportation infrastructure, including a railroad, highway, barge terminal, or regional airport. Tier 2 included parcels that do not meet the Tier 1 criteria but have no major critical area constraints. Constrained parcels have over 25% intersection with critical areas. Table 2 shows the supply of vacant and underutilized parcels by tier.

Table 2: Suitability Tier of Vacant & Underutilized Industrial Parcels in Private Ownership

Jurisdiction	Tier 1	Tier 2	Constrained
Unincorporated Benton County	[illegible]	[illegible]	[illegible]
Kennewick	[illegible]	[illegible]	[illegible]
Richland	[illegible]	[illegible]	[illegible]
West Richland	380	31	
Benton City		5	304
Prosser	43	38	74
Pasco	1,154	2,111	176
Burbank UGA	182	89	
Total:	4,784	3,105	1,446

There is a significant supply of Tier 1 and Tier 2 industrial lands across most jurisdictions, with large acreages concentrated in Richland, Pasco, and unincorporated Benton County (more detail is found in Table 4 on page 8). Constrained parcels, which are limited by critical areas, account for roughly 15% of the private lands available for industrial development. Additional information, such as the availability and capacity of utilities and proximity to complementary land uses, could further refine the suitability analysis and help prioritize areas for future development.

[5] U.S. Department of Energy, Office of Policy. *Request for Information on Artificial Intelligence Infrastructure on DOE Lands*. Federal Register Document [6450-01-P], March 2025.

[6] Port of Benton. *Rail & Intermodal Facility Projects*. Retrieved April 27, 2025, from https://portofbenton.com/projects/rail-intermodal-facility-projects/

Industrial Land Demand Projections

To estimate future industrial land needs in Benton County and the surrounding area, a range of demand scenarios was developed based on projected employment growth and historic industrial buildout trends. Employment projections for manufacturing, wholesale trade, transportation, warehousing, and utilities were sourced from the Washington State Employment Security Department (ESD). High, medium, and low growth scenarios were derived using 20-year trends in industrial job and growth. Average industrial building size (22,715 square feet) and typical lot coverage (7.4%) were used to convert employment and development projections into acreage estimates. These scenarios provide a range of options to evaluate potential industrial land needs over the next 20 years. A summary of the results is provided in Table 3.

Table 3: Projected Industrial Land Acres Needed

Scenario	Growth/Year		Density		Annual Developed Acres	20-Year Developed Acres
Buildout Trend Scenario 1 - Higher Density						
Lower Buildout	280,000	Ft^2 / Yr	0.15	FAR	43	857
Medium Buildout	430,000	Ft^2 / Yr	0.15	FAR	66	1,316
Higher Buildout	500,000	Ft^2 / Yr	0.15	FAR	89	1,775
Buildout Trend Scenario 2 - Lower Density						
Lower Buildout	280,000	Ft^2 / Yr	0.074	FAR	87	1,737
Medium Buildout*	430,000	Ft^2 / Yr	0.074	FAR	133	2,668
Higher Buildout	500,000	Ft^2 / Yr	0.074	FAR	180	3,599
Employment Growth Scenario 1 - Higher Density						
Lower Growth	200	Emp./Yr	12	Emp/Acre	17	333
Medium Growth	339	Emp./Yr	12	Emp/Acre	28	565
Higher Growth	582	Emp./Yr	12	Emp/Acre	49	970
Employment Growth Scenario 2 - Lower Density						
Lower Growth	200	Emp./Yr	4	Emp/Acre	50	1,000
Medium Growth*	339	Emp./Yr	4	Emp/Acre	85	1,695
Higher Growth	582	Emp./Yr	4	Emp/Acre	146	2,910

Notes:

1. * The *Lower Density - Medium Buildout* and *Lower Density, Medium Growth* scenarios are the closest to current trends.
2. Higher, medium, and lower buildout scenarios were estimated based on average building size on industrial lands in the study area and projected buildout per year based on past trends.
3. The medium employment growth rate is based on 1.6% average annual manufacturing growth in Benton and Franklin Counties reported by WA ESD for 2001-2023. The lower and higher growth figures are supported by comparable studies and regional growth trends.

Industrial land demand over the next 20 years is projected to range from 300 to 3,600 acres, depending on market conditions and key assumptions. Variations in job growth, sector-specific expansion, and lot coverage patterns could significantly influence demand. Emerging uses in the region such as renewable energy, data centers, and e-commerce facilities require large footprints and could quickly absorb much of the region's remaining large-parcel supply. While available industrial land supply could likely accommodate higher growth scenarios, demand is often site specific to water supply, power supply and fiber, meaning some localized areas might need additional land to meet future demands. Further analysis and more detailed assumptions are needed to evaluate the supply of industrial-zoned land to accommodate these uses.

Projected Demand vs. Supply

Collectively, the region has over 4,700 acres of vacant or underdeveloped "Tier 1" industrial land in private ownership, indicating that the land supply at the regional scale could potentially accommodate projected demand of up to 3,600 acres (the high buildout, lower density scenario). However, spatial patterns show that industrial development concentrates in areas with access to transportation infrastructure, utilities, and compatible land uses. While jurisdictions such as Richland, Pasco, and unincorporated Benton County hold large acreages of Tier 1 land, other areas—particularly Kennewick, West Richland, and Benton City—have limited supply or higher shares of constrained land. These imbalances suggest that some jurisdictions may face localized shortages of suitable industrial land even as regional supply appears adequate. As noted previously, shifting industrial development patterns toward more land-intensive uses may accelerate the buildout of available large parcels. Table 4 shows the available Tier 1 parcel acreage by parcel size in each jurisdiction.

Table 4: Tier 1 Vacant & Underdeveloped Industrial Zoned Land – Private Ownership

Jurisdiction	□□□uﺔ ð¬╖╡	□□ي□□ﺔ ð¬╖╡	□□ي□□ﺔ ð¬╖╡	□□ي□ﺔ ð¬╖╡	□□ي□□ﺔ ð¬╖╡	±¬ﺔΓ
Benton County	□□□غ	□□□	□□□	□□	□□□	□□□ل
Kennewick				□□	□□	□□
Richland	□□□غ□ل	□□	□□□	□□□	□□	□□□ل
West Richland	□□□		□□□	□□	□□	□□□
Benton City						□
Prosser				□□	□□	□□
Pasco	□□□	□□□	□□□	□□□	□□□	□□□ل
Burbank UGA	□□□		□□	□□		□□□
Total	□□□ل	□□□	□□□ل	□□□	□□□	□□□ل

While the region appears to have sufficient Tier 1 industrial land overall, several jurisdictions may face challenges in accommodating industrial growth trends, which increasingly demand large parcels. Infrastructure availability, permitting processes, and site readiness may further constrain the development potential of many parcels. Additional analysis should assess infrastructure access

– particularly power, water, and sewer - and proposed developments to better understand site viability across jurisdictions.

Industrial Land Use Trends & Needs in Benton County

Unincorporated Benton County has approximately 3,387 acres of total industrial zoned land, of which 1,420 acres (42%) are either vacant or underutilized, privately owned, and not constrained by critical areas. Industrial parcels are concentrated near Finley, Plymouth, Paterson, and north of Prosser near Whitstran. Most of the industrial parcels in these areas are tied to agricultural and transportation-related industries. Various industrial-scale agriculture uses, such as wineries, value added processing, and crop warehousing facilities also occur on agriculturally zoned lands throughout the County. A county-wide desktop GIS review was conducted to evaluate trends on industrially zoned lands within the unincorporated areas, and to identify industrial parcels that might be suitable for land use designation changes in the comprehensive plan update. The reviewed areas are discussed in more detail below.

Finley

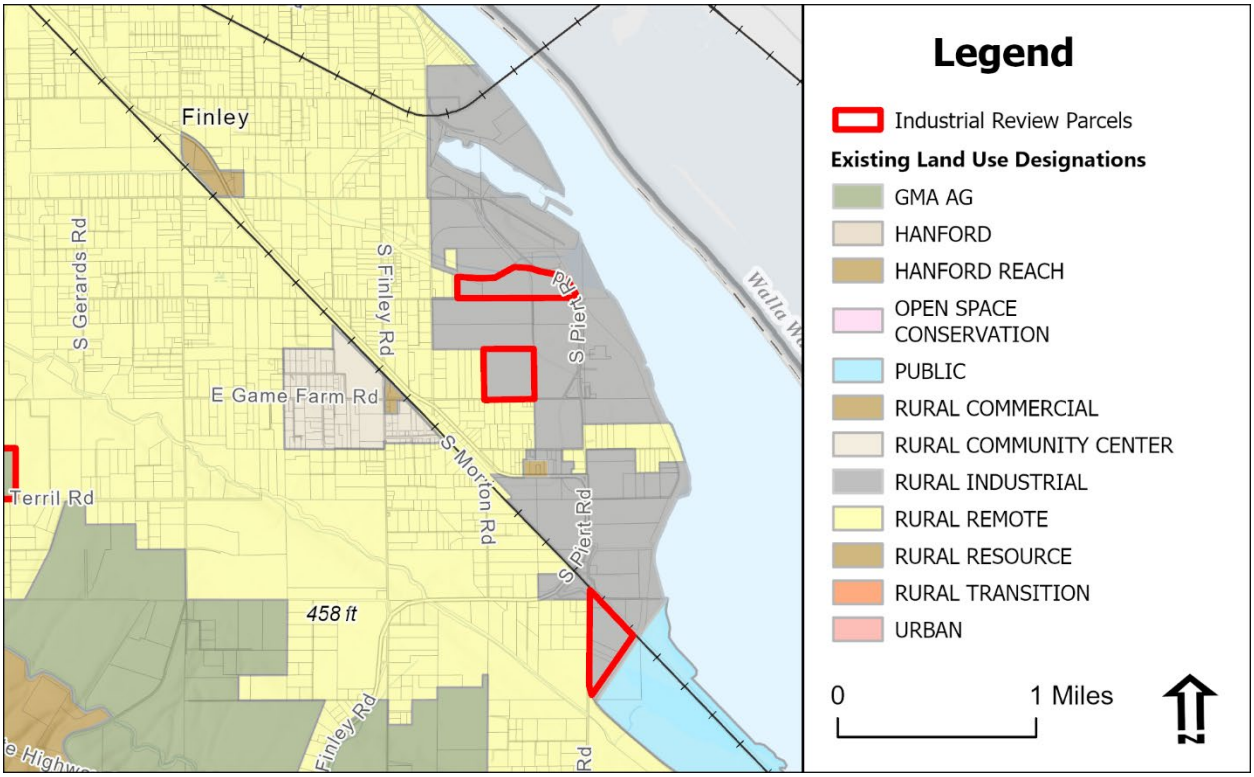
The unincorporated area of Finley is a longstanding industrial area with several large industrial sites with multimodal transport access. There is a cluster of older fertilizer and chemical plants that were established in the 1950s-60s, some of which have been redeveloped and support ongoing use (Port of Kennewick, 2025). The area supports a mix of industrial activity including chemical production and metal fabrication, processing of fertilizer and crop inputs, and logistics/warehousing. Key infrastructure includes State Route 397 - providing trucking access to Interstate 82 - and dual Class I rail served by both BNSF and Union Pacific rail lines. Industrial land in Finley is in the county's *Heavy-Industrial* zone. The area has several large undeveloped parcels over 50 acres. The area's industrial lands are surrounded by and interspersed with rural residences and farmland. Residential development has expanded over the past decade, and rural neighborhoods and small-lot subdivisions lie adjacent to industrial lands.



Agrium Fertilizer Facility in Finley. Photo Credit: Washington Department of Ecology, 2017

There are approximately 785 acres of vacant or underutilized industrial lands in Finley, with a large portion of this acreage in agricultural use. Review of these parcels identified three areas for additional review and discussion of potential land use designation changes. The areas include parcels owned by the Port of Kennewick, and others in private ownership. These areas are shown in Figure 3 below.

Figure 3: Finley Industrial Parcel Review



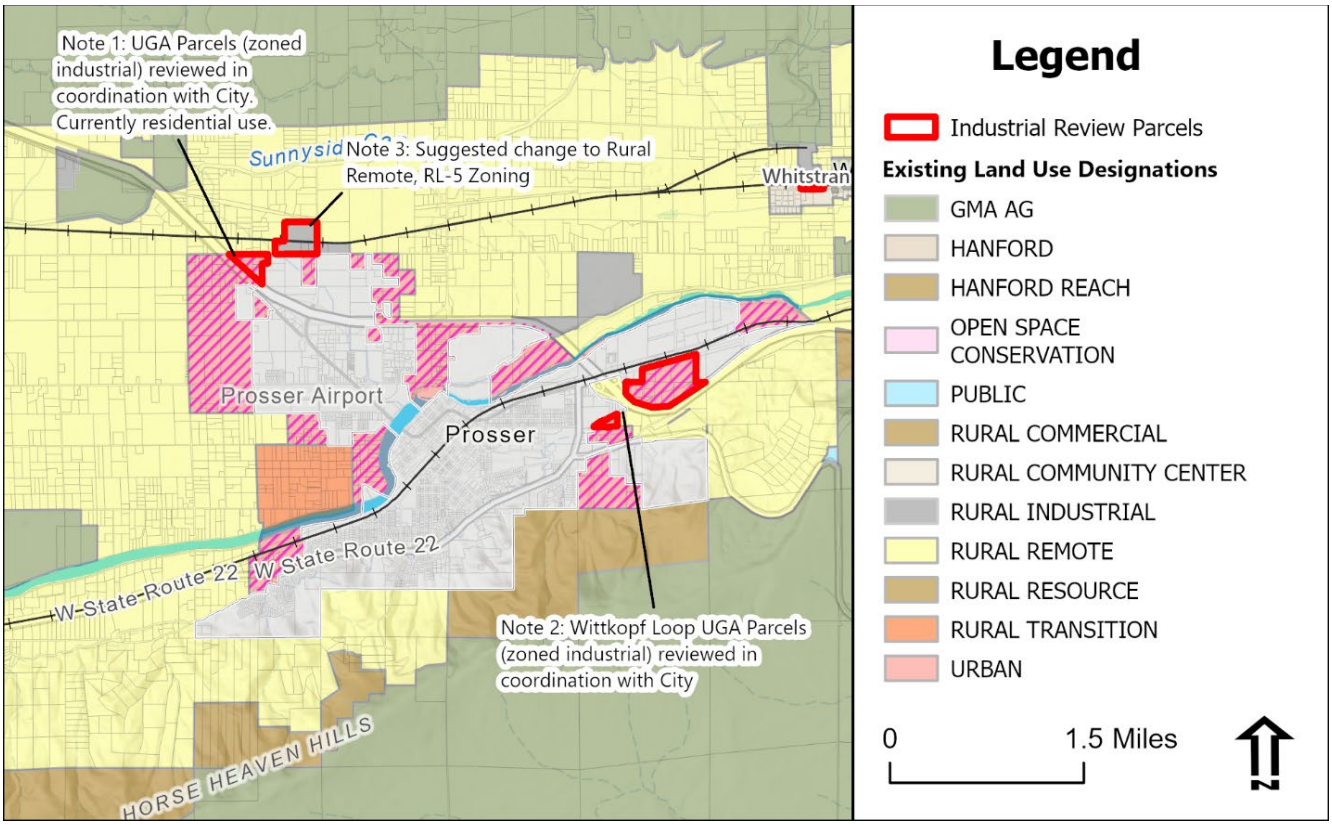
Designation changes for the selected parcels in Finley were further discussed with County planning staff, and, where appropriate, the Port of Kennewick. The discussions identified that although these parcels are not currently developed, they buffer more intensive industrial uses and may also be suitable for future industrial use. Significant rail and road infrastructure which could serve future industrial use exists within and adjacent to the reviewed parcels. Ultimately, no suggested designation changes were identified.

Prosser

There are approximately **420 acres** of undeveloped/underutilized industrially designated lands surrounding the city limits of Prosser, consisting of 44 parcels ranging from 1-133 acres. A large portion of the land (55%) is within the Prosser UGA and adjoins or supports additional industrial areas within Prosser city limits. Several parcels within the Prosser UGA were identified for further review in coordination with the City, but the current designations were deemed appropriate (see Notes 1 & 2 in Figure 4). Additionally, four parcels north of Prosser totaling 40 acres were identified for change to from Rural Industrial to Rural Remote designation. These parcels are

currently surrounded by agricultural and low-density residential use, and the parcels were unlikely to be developed for industrial use. Consultation with the property owners indicated that the adjacent Rural Remote designation was more appropriate (see Note 3 in Figure 4). The areas that were considered for designation changes are shown in Figure 4 below.

Figure 4: Prosser Industrial Parcel Review



Whitstran

The Whitstran area contains roughly **37 acres** of industrial land, consisting of seven parcels in the Light Industrial zone. The area has access to Burlington Northern and Union Pacific rail lines. The industrial land in the area remains mostly undeveloped. The site is across from Whitstran Elementary School, potentially limiting certain industrial uses. No designation changes are proposed at this time but may be suitable in the future.



Industrial Zoned lands in Whitstran

Plymouth

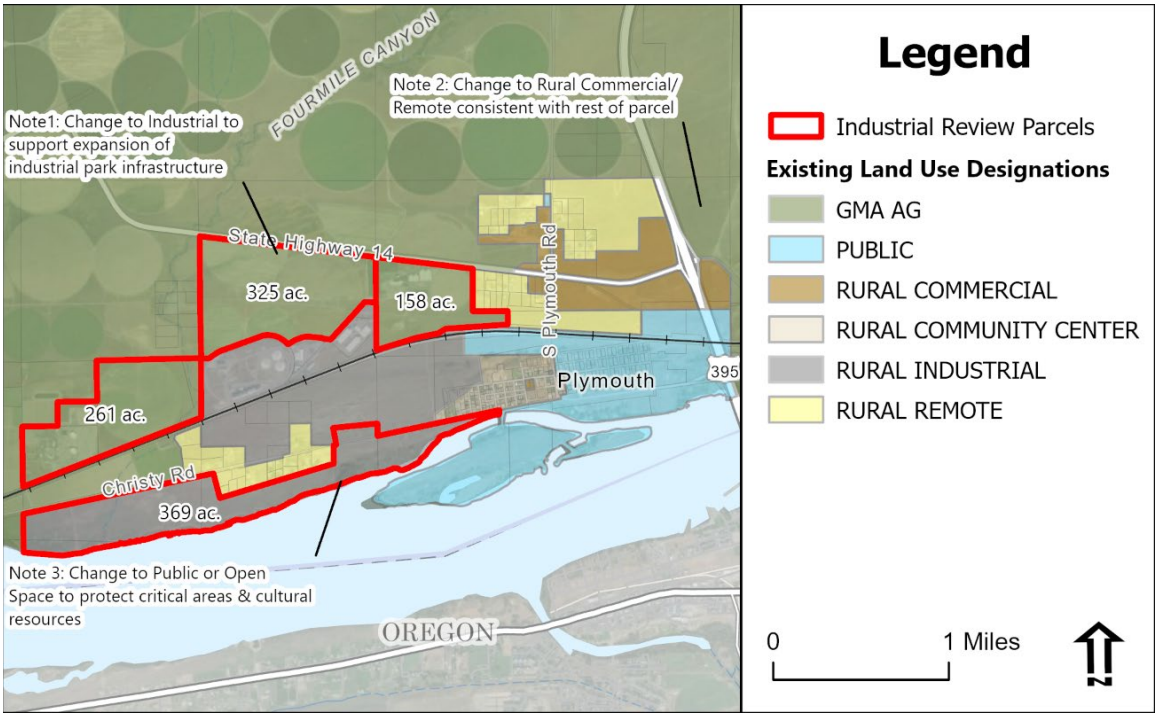
Plymouth has approximately 773 acres of land designated as industrial and has an existing industrial park focused on bulk processing, handling, and storage of agricultural products. The site has river, rail, and highway access, and proximity to Umatilla, Oregon, making it a hub for processing and distribution of agricultural products. Some of the land is next to the river and publicly owned and may be more suitable for an open space-related designation.



Grain flaking facility in the Plymouth Industrial Park, 2025

Industrial activity at the industrial park includes crop handling, warehousing, and value-added processing. A grain flaking facility was completed at the site earlier in 2025. Removal of some unsuitable lands for industrial development and addition of other more suitable lands at the Plymouth Industrial Park was identified as a key need to provide further industrial support to surrounding agriculture and other compatible industrial uses. Approximately 744 acres surrounding the industrial park, currently designated GMA Agriculture, are suggested for change to Rural Industrial. To support these changes, countywide review of agricultural land use designations was completed based on criteria in WAC 365-190-050. The parcels recommended for change from GMA Agriculture to Industrial designation were identified in the supplemental review as having limited agricultural suitability and greater alignment with industrial land use needs. Additionally, 369 acres of public and port-owned industrial land along the Columbia River with open space and cultural resource values is suggested for change from Rural Industrial designation to public or Open Space Conservation. This would result in a net increase of 375 acres of industrial land in Plymouth. The suggested changes are shown in Figure 5 below.

Figure 5: Plymouth Industrial Parcel Review



Paterson



Columbia Crest Winery in Paterson

Paterson is located at the junction of State Highway 14 and State Route 221, and has approximately 140 acres of industrial zoned land, most of which is undeveloped. Columbia Crest Winery, the largest winery and wine producer in Washington State, is in Paterson. Paterson is positioned as a potential future hub for agricultural processing and logistics due to its proximity to irrigated farmlands and access to highway, rail, and barge transportation. However, industrial activities such as crop storage and winemaking primarily occur on agricultural lands surrounding Paterson rather than on the industrially zoned lands and there is no present need for additional industrial land. In the future, land-intensive industrial uses such as power generation and data storage may create a need for additional industrial land designations.

Additional Analysis of Industrial Land Uses on Agricultural Land

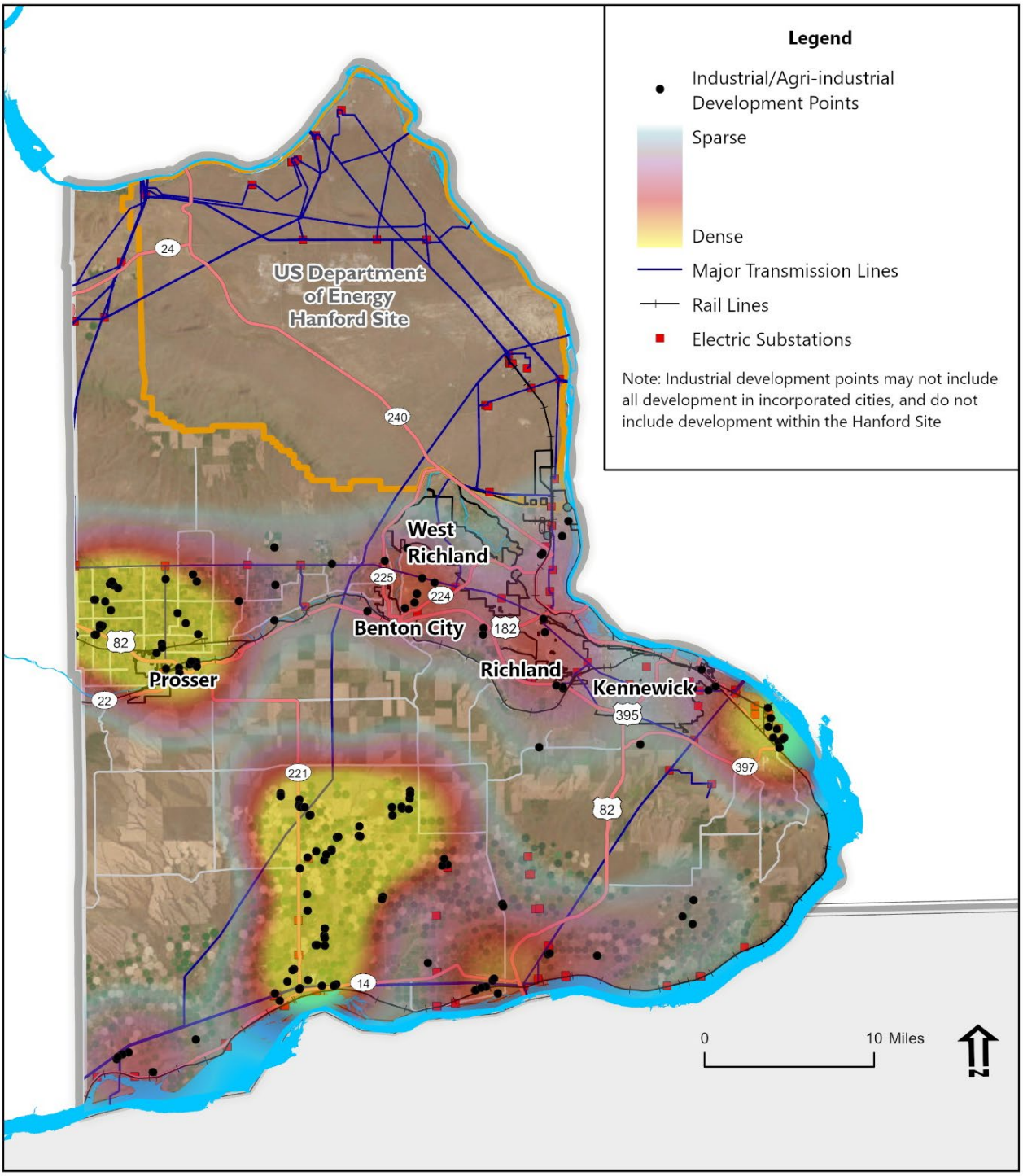
In many areas of Benton County, agriculture-related and supporting industrial uses often occur outside of designated industrial zones, particularly within the GMA Agriculture District. While these uses may be directly tied to agricultural production, their scale and intensity increasingly resemble industrial development and contribute to the broader industrial land base. Industrial activity within these wider agricultural catchment areas is often complemented by larger nodes of industrial-zoned land—such as those in Prosser, Plymouth, and Finley—that serve as regional hubs for storage, processing, and transportation to broader markets. To better understand these patterns, AC Geo conducted an additional review of industrial-scale land uses located outside of industrial zoned areas. The review incorporated the following data sources:

- Industrial stormwater permits issued by the Department of Ecology
- "Environmental Facilities" mapped by the Department of Ecology with further QC
- Parcels with industrial related tax classification
- Parcels with industrial related assessor's "neighborhood code"
- Building permit data
- Opportunistic collection from aerial imagery

The review also included collaborative discussions with Benton County planning staff, employees of Tri-County Development Council (TRIDEC), Benton Public Utility District (PUD), and Benton Rural Electric Association (REA), and industrial stakeholders. The purpose of these discussions was to identify development trends, infrastructure needs, and recurring land use patterns. A heatmap showing areas with concentrations of industrial/agri-industrial development in unincorporated areas is included in Figure 6.

The review indicates that agricultural production areas in Benton County rely on facilities dispersed across the landscape as well as strategically located industrial hubs to support storage, packing, processing, and distribution activities that cannot be accommodated on agricultural parcels. These larger nodes tend to be located near major transportation infrastructure and utility services that enable industrial-scale operations. As agricultural products flow outward from areas of production toward wider markets, these areas provide additional capacity and flexibility needed for more intensive processing, storage, and distribution functions. The Plymouth area functions as one of these regional nodes for surrounding GMA Agricultural lands in the southern portion of the County. The proposed additional industrial lands in Plymouth would reinforce this role by providing additional industrial capacity to support regional agriculture and other complementary uses, while concentrating more intensive industrial activities around an existing developed site.

Figure 6: Industrial Development Heat Map



Conclusions & Recommendations

The need for industrial land is dependent on infrastructure, development trends, and other location-specific factors. Some areas within Benton County, such as Finley and Prosser, have an adequate supply of industrial land, and removals of land from industrial designation may be appropriate to meet other land needs and to avoid future incompatible uses. Four parcels north of Prosser are recommended for change from Rural Industrial to Rural Remote due to surrounding residential land use patterns and limited potential for future industrial development. Further review of industrially zoned lands within the Prosser UGA is also occurring in coordination with the City.

Plymouth has localized needs for additional industrial lands to support agriculture and related economic development, and several parcels are suggested for change from GMA Agriculture to Industrial designation. These parcels have limited suitability for agricultural production but are part of a key industrial hub that supports the regional agricultural economy. A countywide review of agricultural resource lands was completed to evaluate these changes, consistent with the soil capability and land-use factors established under WAC 365-190-050. This supplemental review is found in *Benton County Draft Comprehensive Plan*, Volume II, Appendices F and G. The recommended industrial designation changes are included below in Table 5.

Table 5: Suggested Industrial Land Use Changes in Unincorporated Areas

	Community	Parcel	Acres	Existing Land Use Designation	Proposed Designation	Notes
Additions	Plymouth	101571000002004	324.1	GMA AG	RURAL INDUSTRIAL	Supports industrial needs and has limited ag suitability.
	Plymouth	PTN of 106582000001002	156.5	GMA AG	RURAL INDUSTRIAL	
	Plymouth	111571000001003	150.1	GMA AG	RURAL INDUSTRIAL	
	Plymouth	111571013428001	18.2	GMA AG	RURAL INDUSTRIAL	
	Plymouth	111572000001000	20.0	GMA AG	RURAL INDUSTRIAL	Existing industrial use (gas facility)
	Plymouth	111573000000000	72.4	GMA AG	RURAL INDUSTRIAL	
Removals	Plymouth	PTN of 107583000000000	51.8	RURAL INDUSTRIAL	PUBLIC	Change to public to protect habitat and shorelines.
	Plymouth	111574000000000	161.0	RURAL INDUSTRIAL	PUBLIC	
	Plymouth	112573000009000	128.6	RURAL INDUSTRIAL	PUBLIC	
	Plymouth	114570000000000	21.6	RURAL INDUSTRIAL	PUBLIC	
	Prosser	127944000013001	22.2	RURAL INDUSTRIAL	RURAL REMOTE	Parcels are surrounded by RL-5, no current or future plans for industrial use.
	Prosser	127944000014002	11.3	RURAL INDUSTRIAL	RURAL REMOTE	
	Prosser	127944013097003	3.1	RURAL INDUSTRIAL	RURAL REMOTE	
	Prosser	127944013097004	3.0	RURAL INDUSTRIAL	RURAL REMOTE	

Total Added Acres: **741.3**

Total Removed Acres: **402.7**

Appendix J
Energy Overlay Memorandum

Final Draft Memorandum

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

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

Date: April 30, 2026

Re: Energy Overlay Zoning

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 were used to evaluate potential changes to the Land Use and Rural elements of the plan and County development regulations. The analysis indicated that there was limited suitability for large-scale renewable energy projects outside of the areas where they are already permitted in industrial and unclassified lands, and therefore no changes are recommended.

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 **Small Modular Nuclear Reactors (SMRs)** or 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)[1] 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.

[1] Washington State Legislature. (2019). Senate Bill 5116-S2: Clean Energy Transformation Act.

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.[2] 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 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. [3] 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).[4] 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:

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[2] NREL, 2018 *Solar Irradiance Map*

[3] US Energy Information Administration *Annual Energy Outlook* (2023).

[4] NREL Wind Resource Database https://wrdb.nrel.gov/data-viewer

"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).

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.[5] 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.

Other Potential Future Energy Generation Facilities

In addition to solar and wind energy, Benton County may see future development of other energy generation facilities, such as Small Modular Reactors (SMRs) and Anaerobic Digestion Facilities.

Small Modular Reactors (SMRs): SMRs are advanced nuclear fission reactors that are smaller than conventional nuclear reactors. They can be built in a factory, shipped to a site, and installed, offering greater flexibility and a smaller footprint. Their modular design can allow for scalability and can potentially be sited in areas with less extensive land requirements compared to large-scale nuclear power plants.

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[5] *Battery Energy Storage Systems*. American Planning Association, 2024

Anaerobic Digestors: these facilities use microorganisms to break down organic materials, such as agricultural waste and manure, to produce biogas. Anaerobic digestion facilities may be particularly appropriate on agricultural properties such as industrial-scale dairies in Benton County. These facilities often provide power to the grid or for on-site use. Siting these facilities requires consideration of factors like odor control, waste management, and proximity to agricultural feedstock sources.

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.[6] The County's allowed, accessory, and conditional use designations for wind and solar are summarized in Table 1.

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

[6] Benton County Ordinance OA 2021-004

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
At least four additional solar energy projects are proposed but have not yet been made public.			

*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.[7] 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.

[7] USDA Census of Agriculture, 2022 *County Profile*.

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 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[8]

[8] NOTE: The analysis considered if soils with the classification "Prime Farmland if Irrigated" are irrigated

- 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)..[9] 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.

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
- WSSRI Habitat Corridors, Cores, Growth Opportunity Areas, and Other Habitats

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

[9] Based on WDFW PHS data provided by Benton County GIS

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 potential areas of lower conflict with protected agricultural lands, sensitive habitats, and other limitations to inform siting considerations for renewable energy development[10]. 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

[10]NOTE: Preliminary analysis was conducted using Washington State University Energy Program's "Columbia Plateau Least Conflict Solar Siting" data gateway.[10] 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.

WDFW PHS including: • Shrubsteppe • Ferruginous Hawk breeding areas • Biodiversity Areas and Corridors • All other state listed species	Benton County GIS
Geologically Hazardous Areas	Benton County GIS

Analysis Scenarios

To determine if 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.

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.[11]
- 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

[11] Irrigation of agricultural lands was assessed using WSDA agricultural lands data, cross referenced with LandSAT multispectral satellite imagery seasonal composites.

- 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

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

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. While portions of the "Lower Conflict" agricultural lands may be developable based on site-specific conditions, the high degree of overlap with environmental constraints and the fragmented, dispersed nature of these areas limit their effectiveness as a consistent or scalable land base for directing energy development.

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 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 is allowed.

Table 5: Existing Land Base to Support Renewable Energy Development

Zone	Developed	Underutilized	Vacant	% of *Vacant* in PHS, GHA, or Wetlands
Heavy Industrial	380	305	1,154	69.1%
Light Industrial	450	221	713	60.4%
Hanford Industrial[1]	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 fragmented pattern on the landscape, concentrated at the edges of intensively farmed land, and often intersecting with shrubsteppe and other protected habitats. Under all three modeled scenarios, over 70% of the lands classified as having lower conflict with agriculture intersected with sensitive habitats, wetlands, and geologic hazard areas, as shown in Table 4. By comparison, Table 5 shows that a lower percentage of lands within existing zones where renewable energy is permitted—particularly Light Industrial and Heavy Industrial—intersect with these constraints, indicating fewer site limitations in areas already designated for energy development. Under each analysis scenario, the typical size and layout of contiguous "Lower Conflict" areas ranged from 20 – 70 acres overall, and 6-30 acres if sensitive habitats, wetlands, and steep slopes were avoided. This spatial layout would not support larger utility scale solar or wind developments (100+ acres[12]) without likely impacts productive agricultural soils, sensitive environments, or both.

Recommendations

Given the limited suitability for large-scale wind and solar facilities on agricultural lands, Benton County should maintain existing development regulations for renewable energy facilities in the GMA Agriculture Zone rather than adopting an energy overlay zone. Benton County has available lands for energy development in the Light Industrial, Heavy Industrial and Unclassified zones – particularly within the boundaries of the Hanford site. This approach is consistent with the GMA requirement to conserve

[12] American Planning Association. (2023). *Solar at Scale Guidebook (V3).*

agricultural lands of long-term commercial significance and limit the conversion of such lands to non-agricultural uses, as well as the Washington Department of Fish and Wildlife (WDFW) Wind and Solar Siting Guidance, which emphasizes avoidance of shrubsteppe habitat, biodiversity corridors, and core habitat areas (WDFW, 2025). Within Benton County's GMA Agriculture zone, many of the lower-productivity agricultural lands contain valuable habitat, creating a direct tradeoff where avoiding agricultural impacts would likely result in habitat impacts, and vice versa. Minor solar power generation facilities may still be appropriate within the GMA Agriculture Zone where sited on previously disturbed or developed portions of properties and where impacts to agricultural viability and priority habitats can be avoided or minimized.

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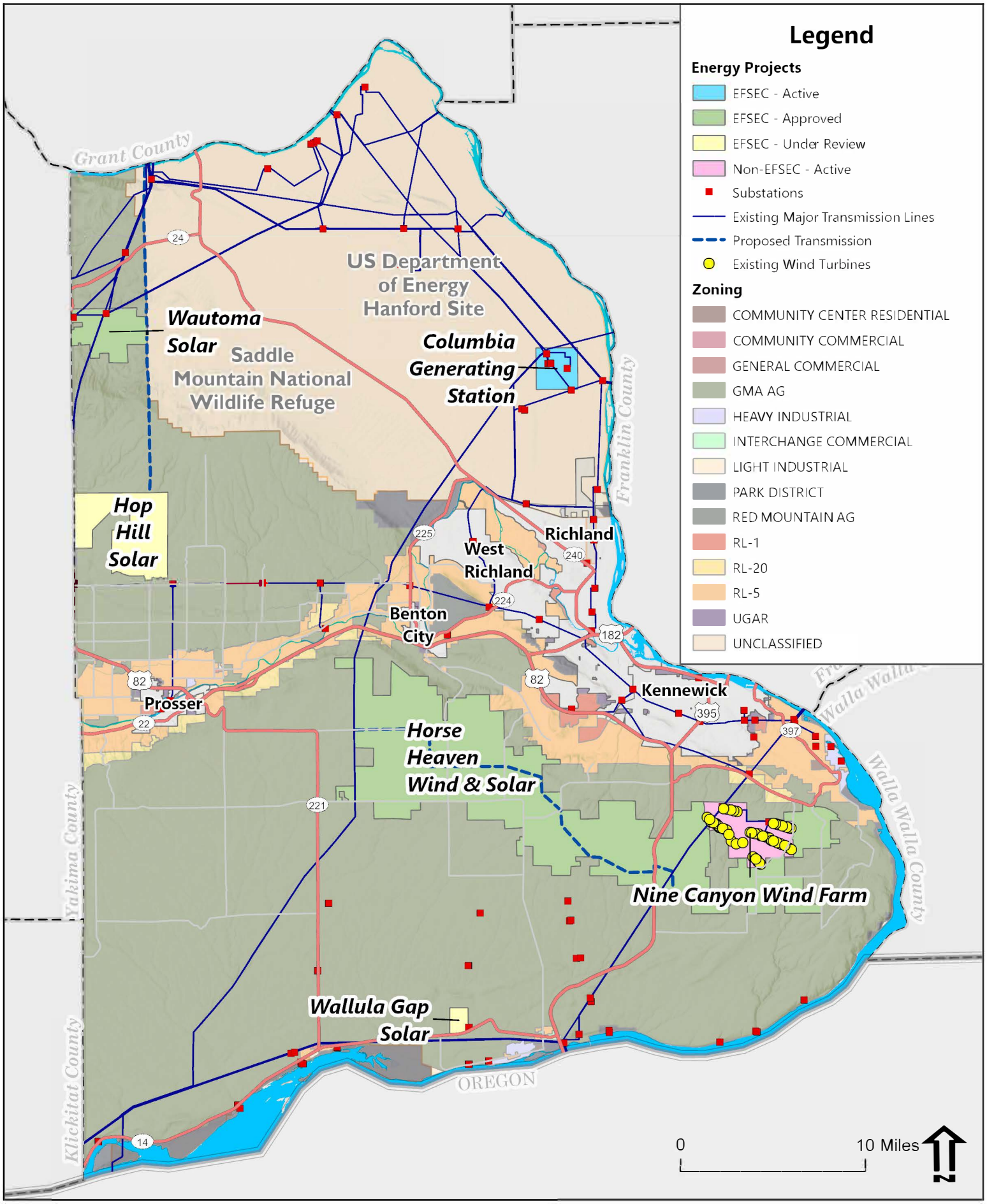
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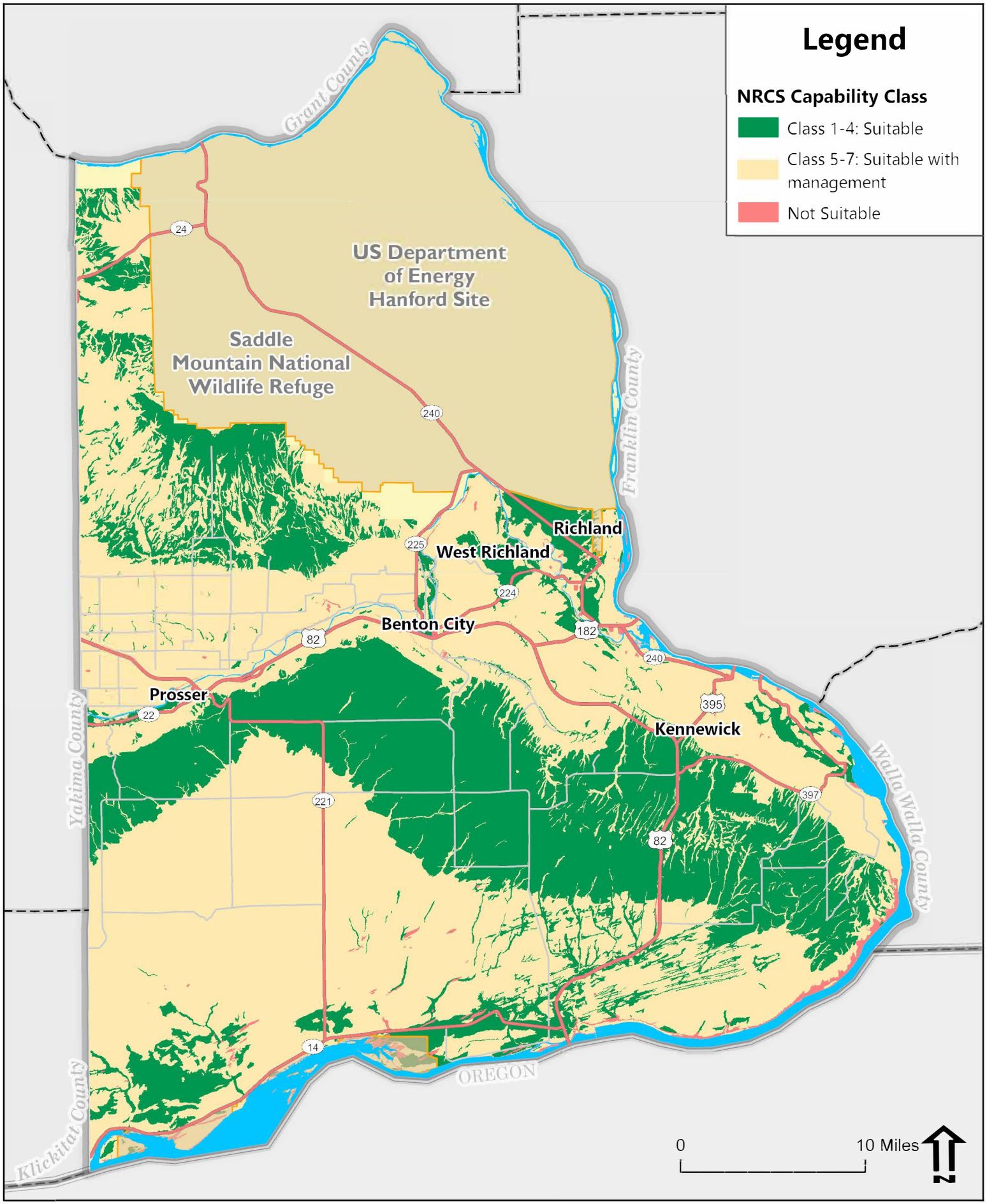
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Appendix A
Energy Overlay Map Folio



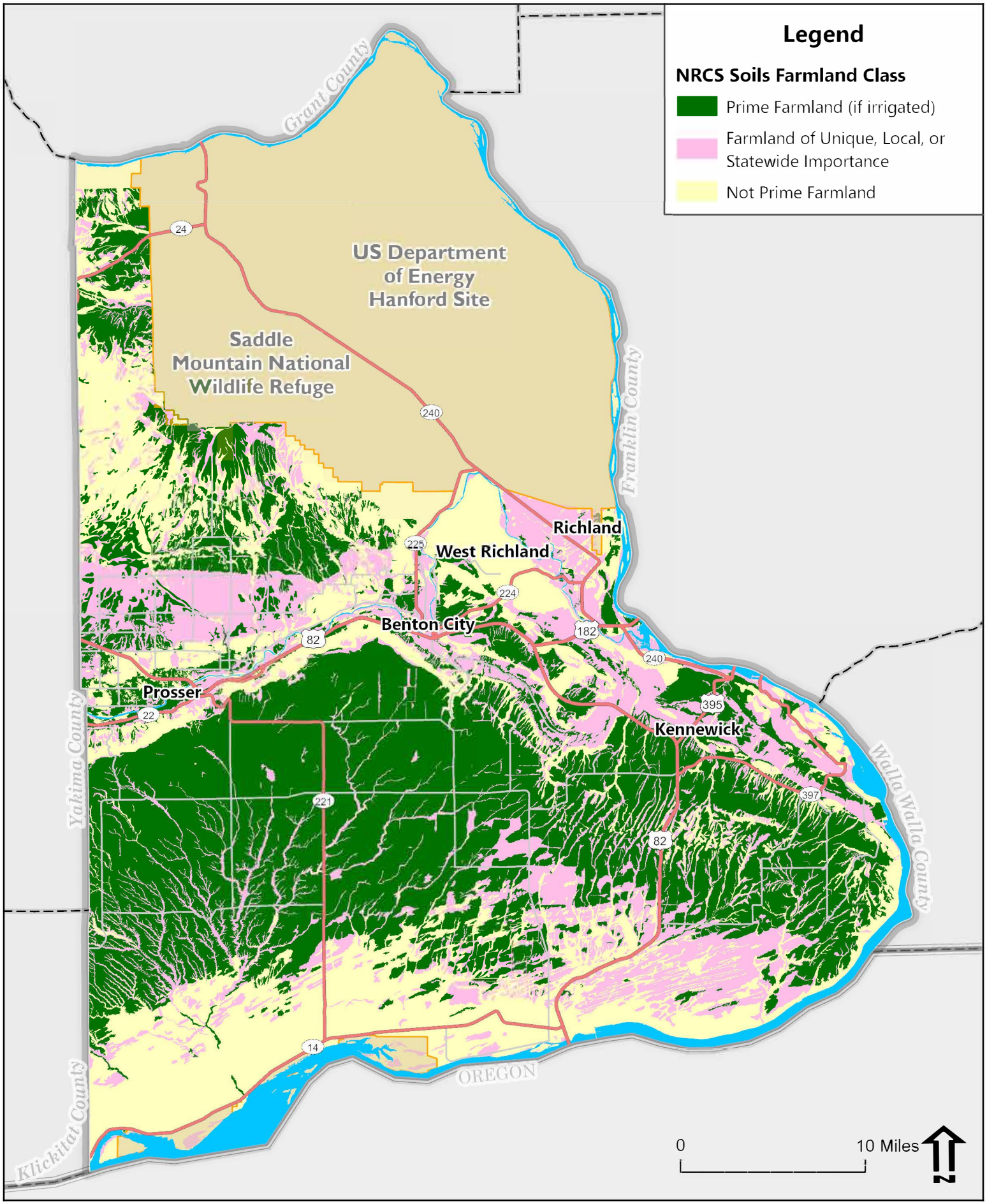
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Figure A-1
Energy Projects in Benton County



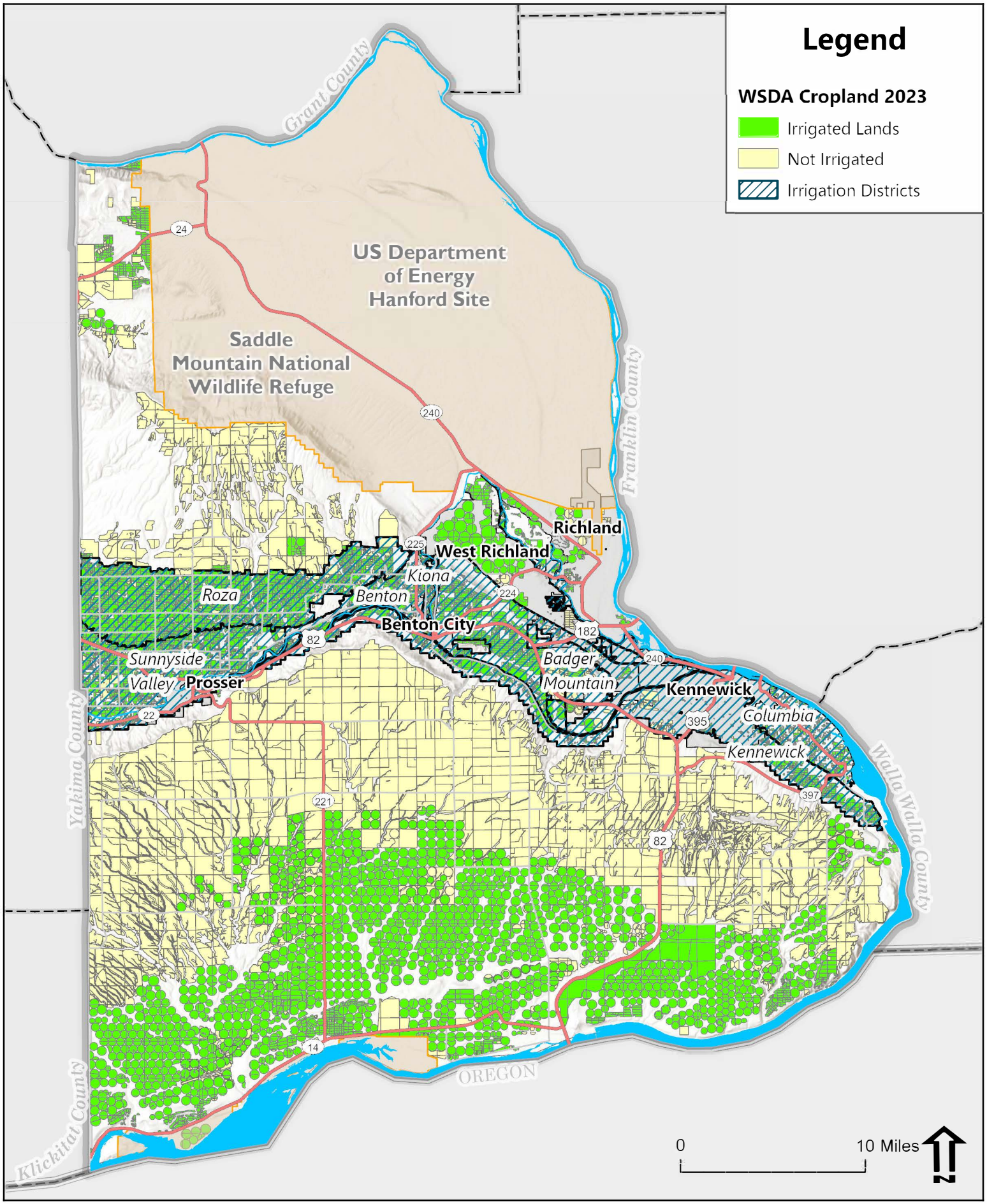
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Figure A-2
NRCS Land Capability Classes



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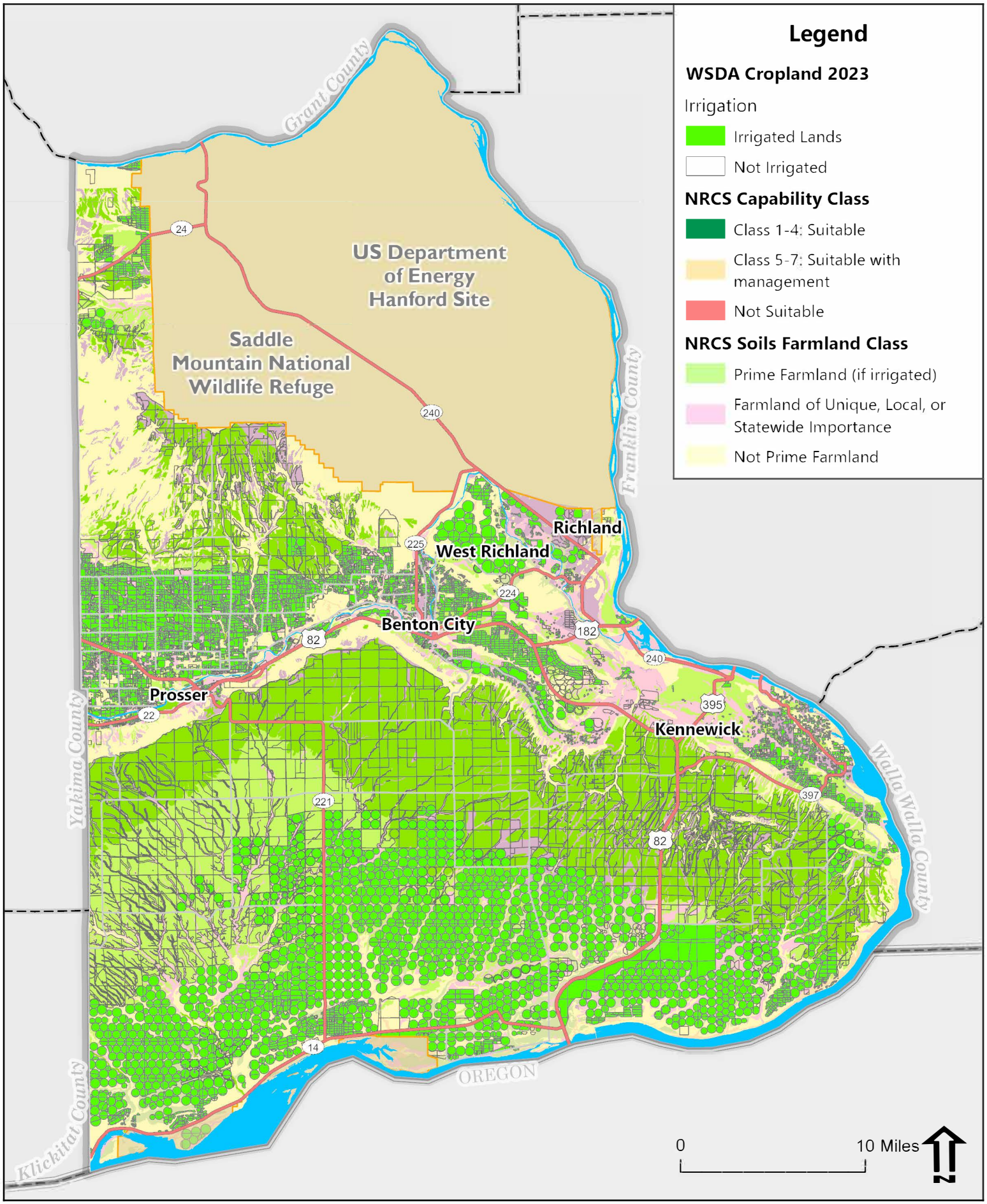
Figure A-3
NRCS Farmland Designations



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Figure A-4

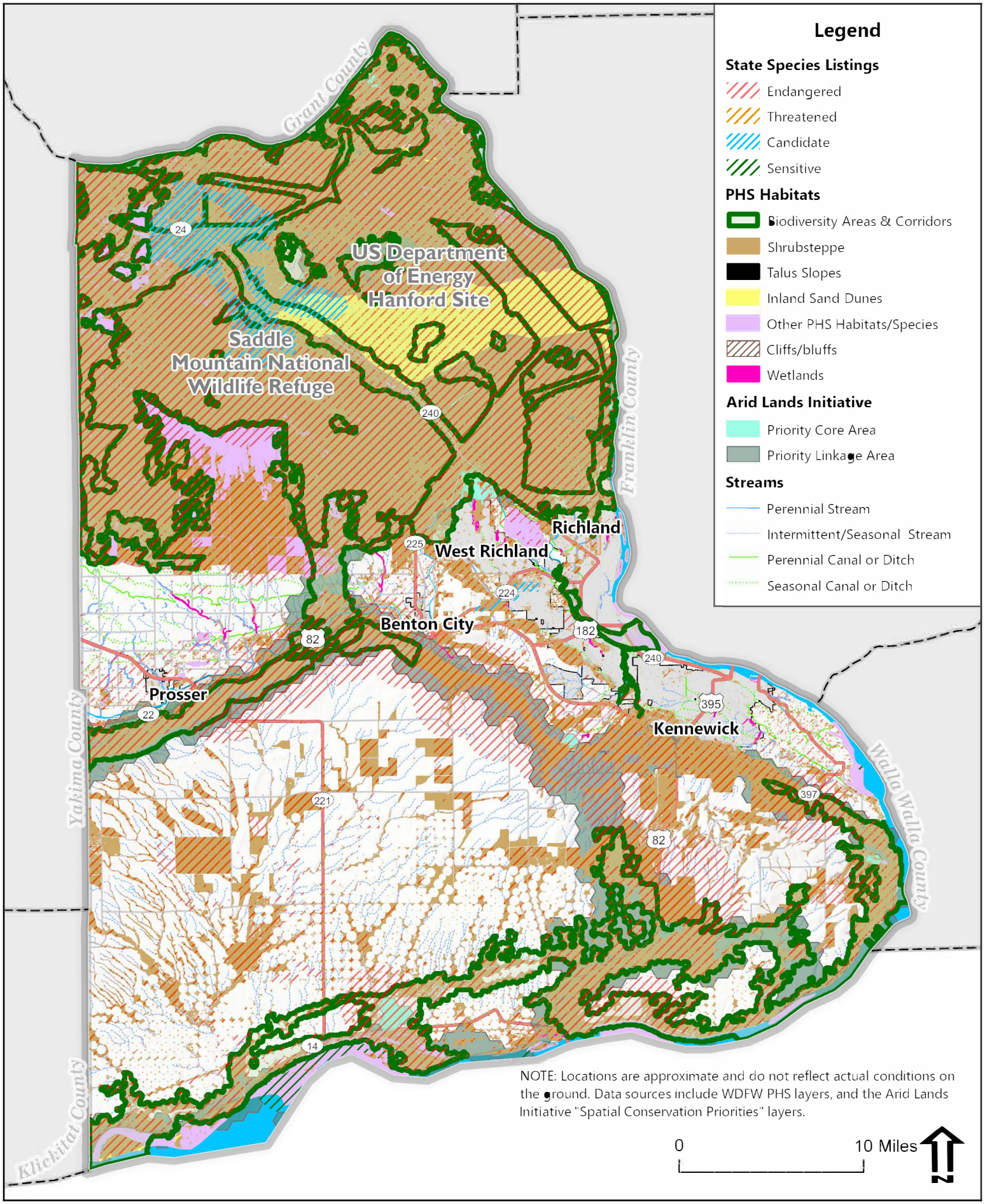
Irrigation Districts & WSDA Ag Lands



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Figure A-5

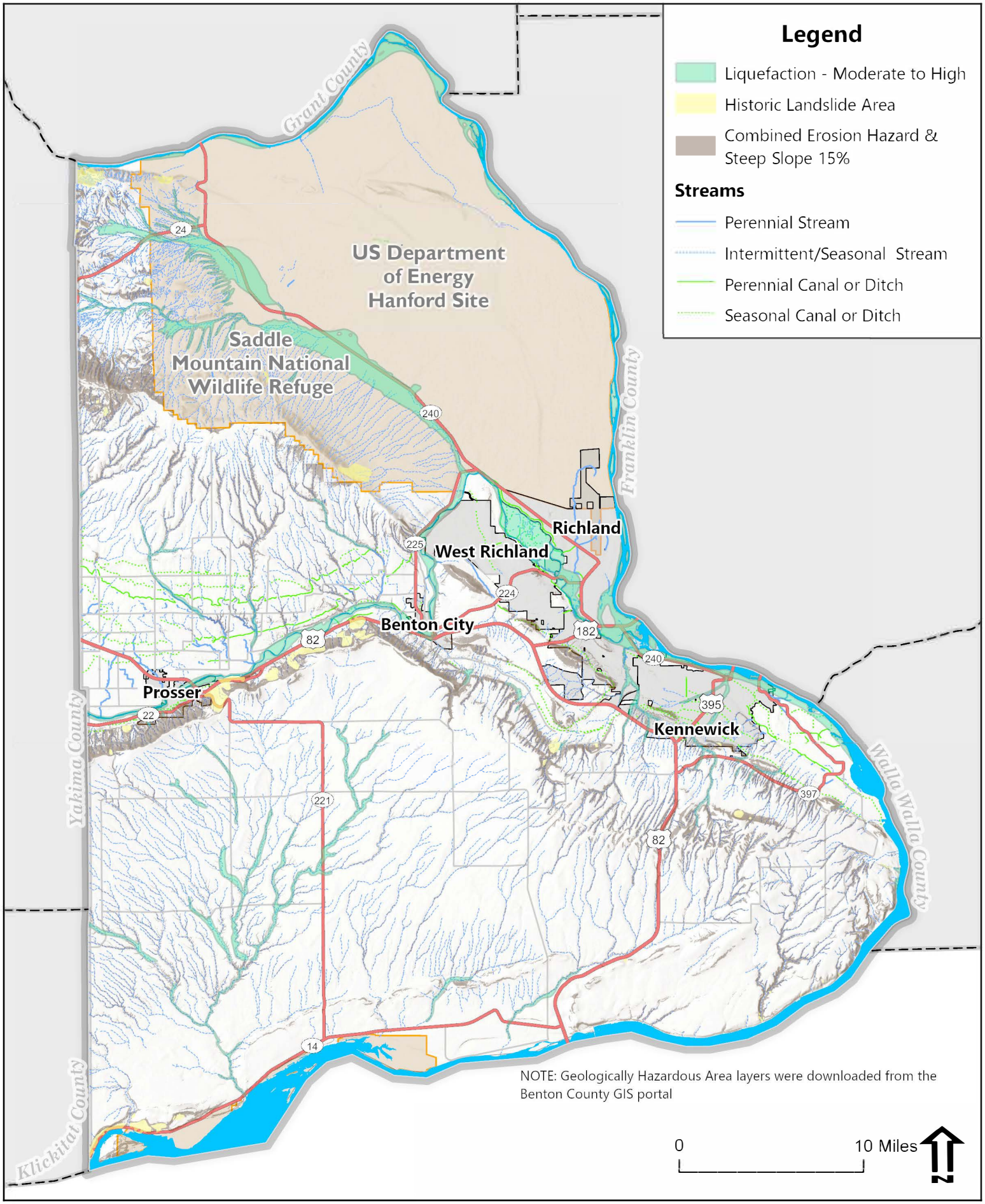
WSDA Ag Lands, NRCS Farmland & Soil Capability Classes



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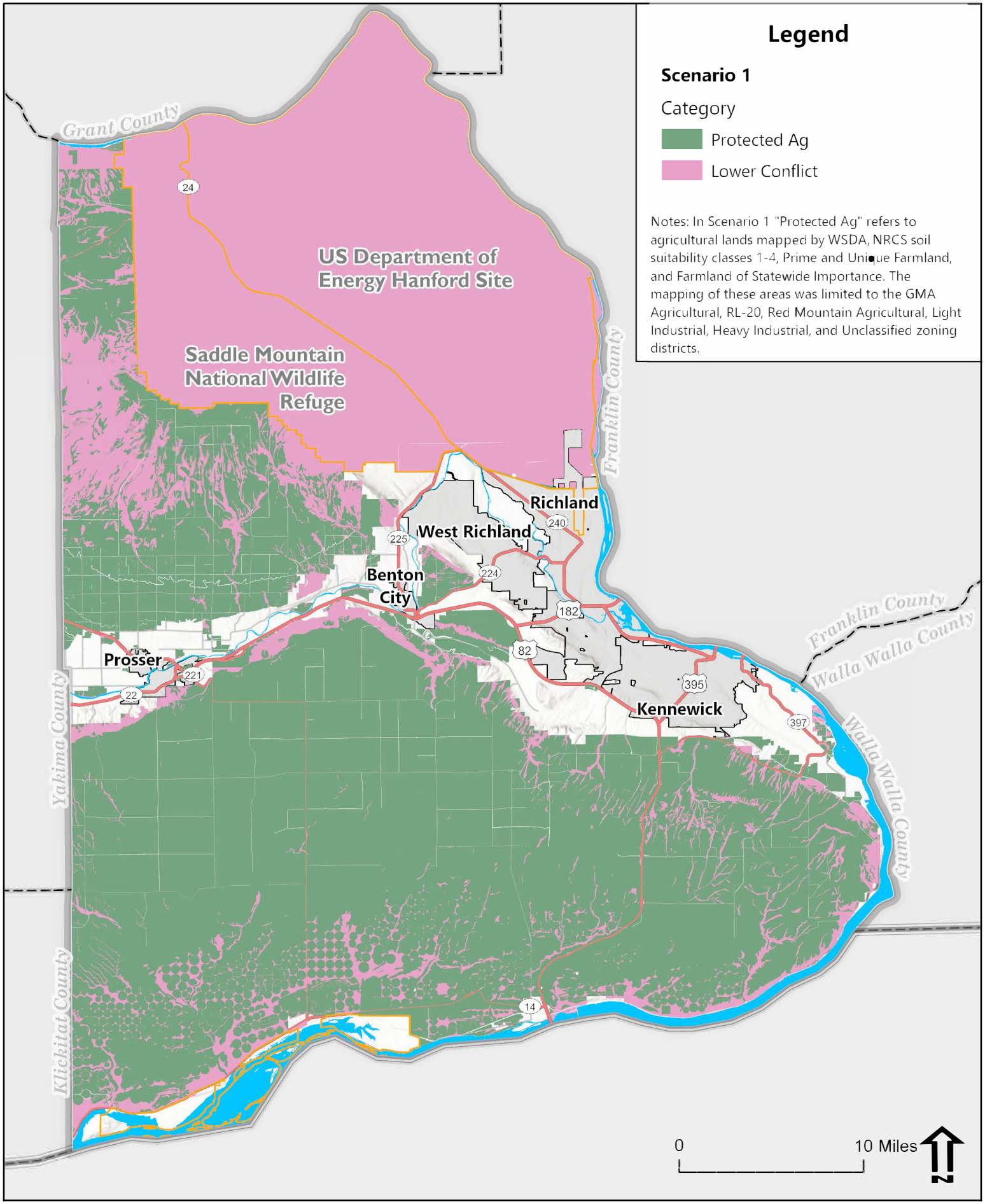
Figure A-6

WDFW Priority Habitats & Species



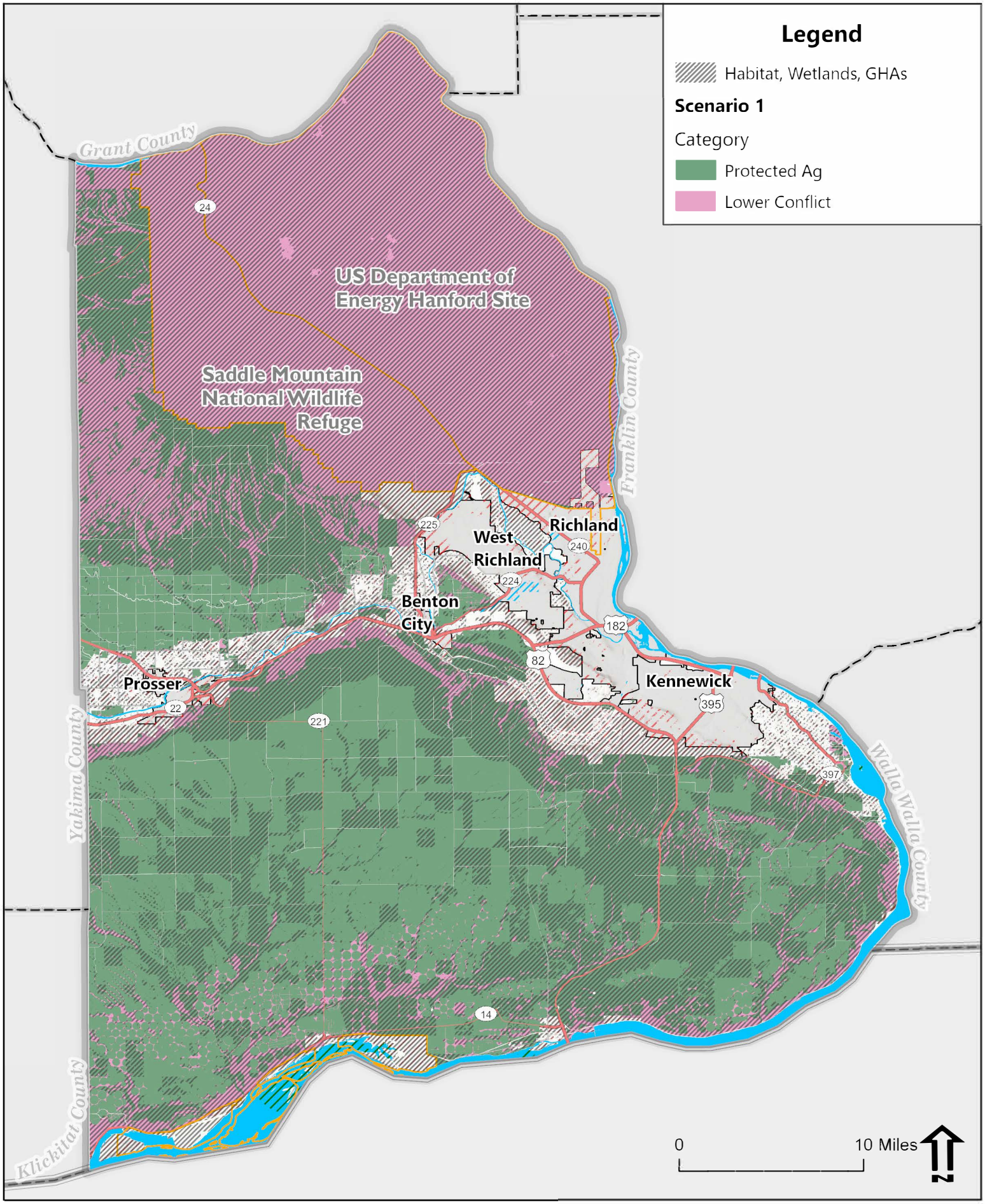
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Figure A-7
Geologically Hazardous Areas



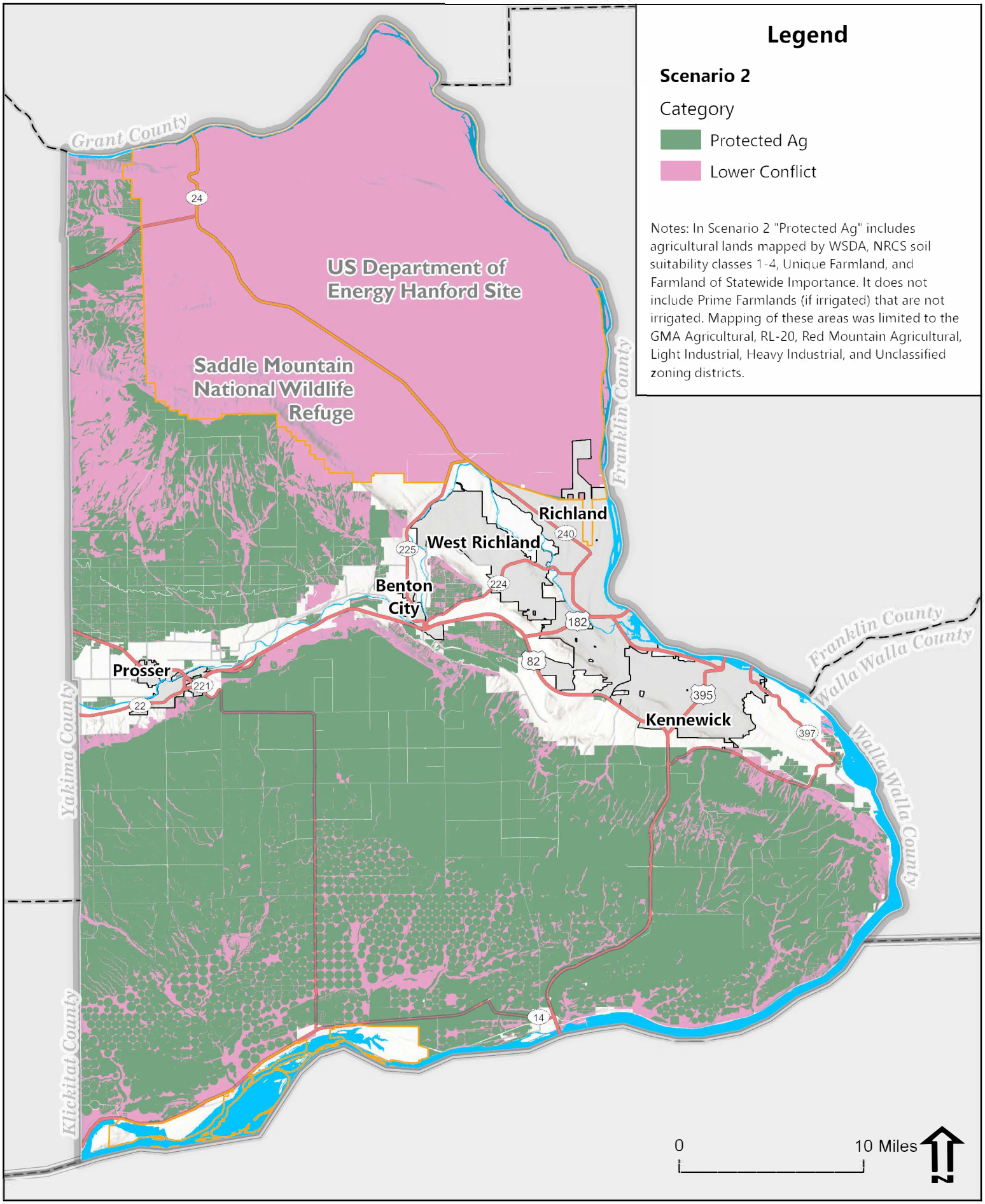
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Figure A-8
Lower Conflict Analysis Scenario 1



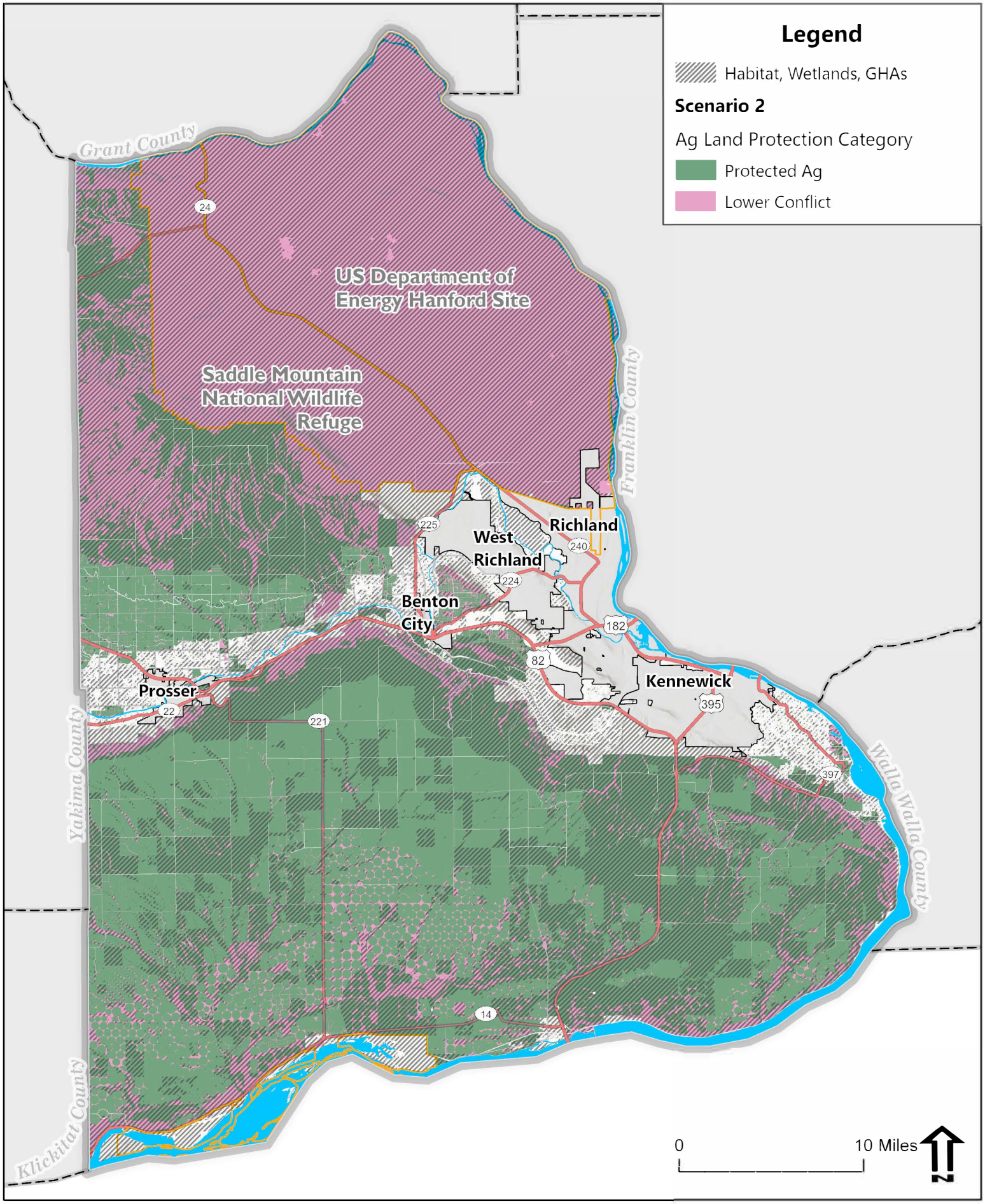
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Figure A-9
Scenario 1 with PHS & GHA



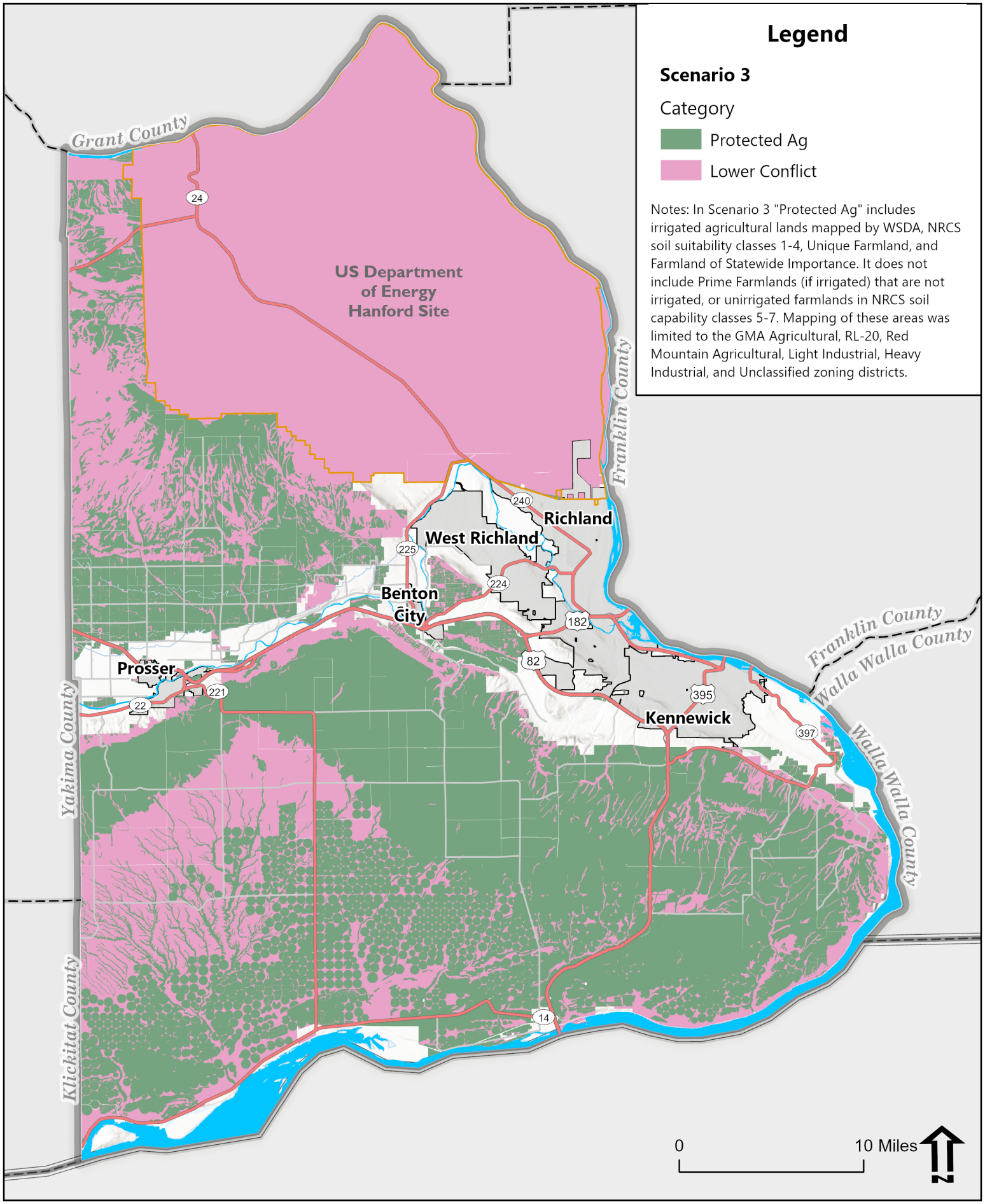
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Figure A-10
Lower Conflict Analysis Scenario 2



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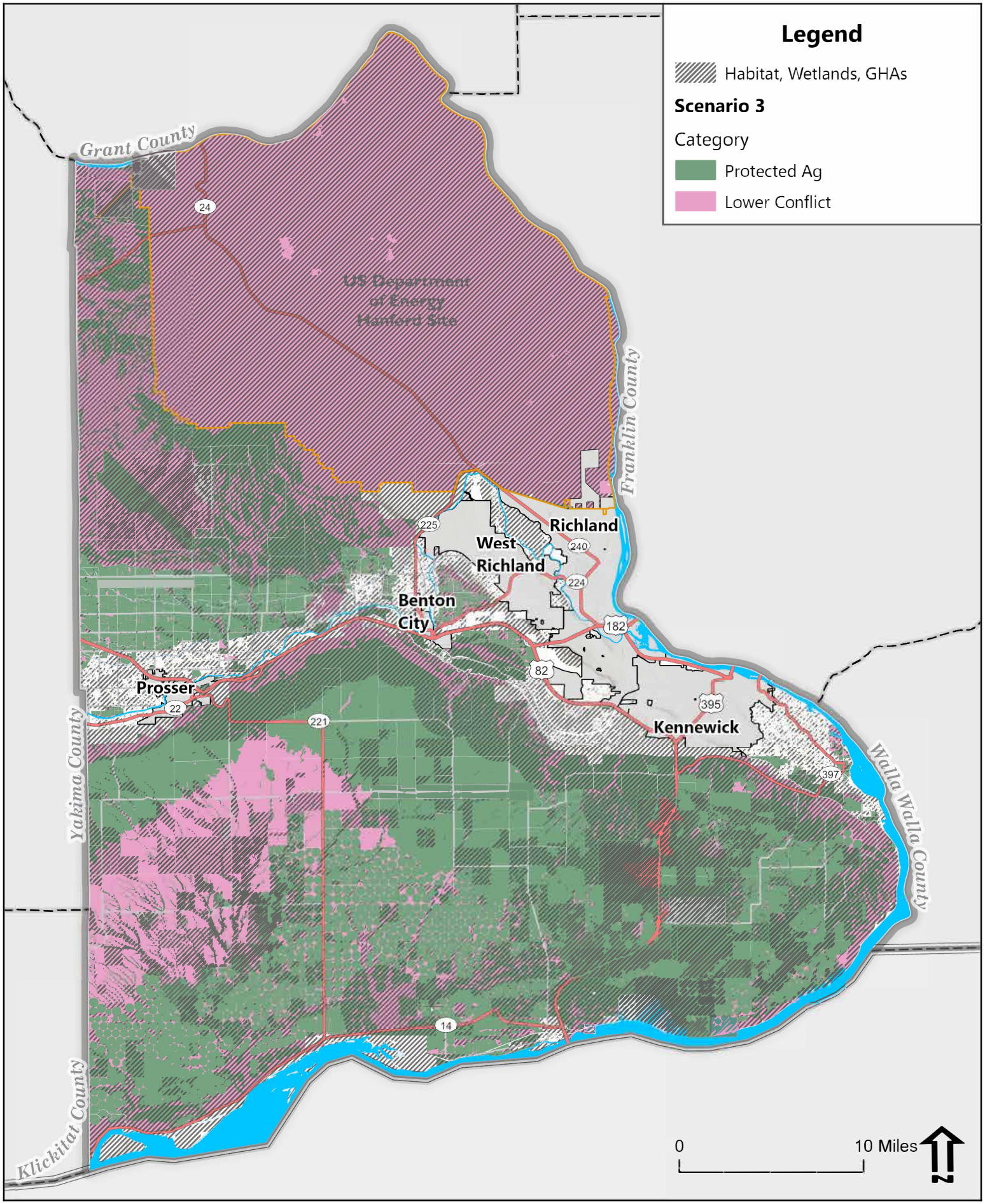
Figure A-11
Scenario 2 with PHS & GHA



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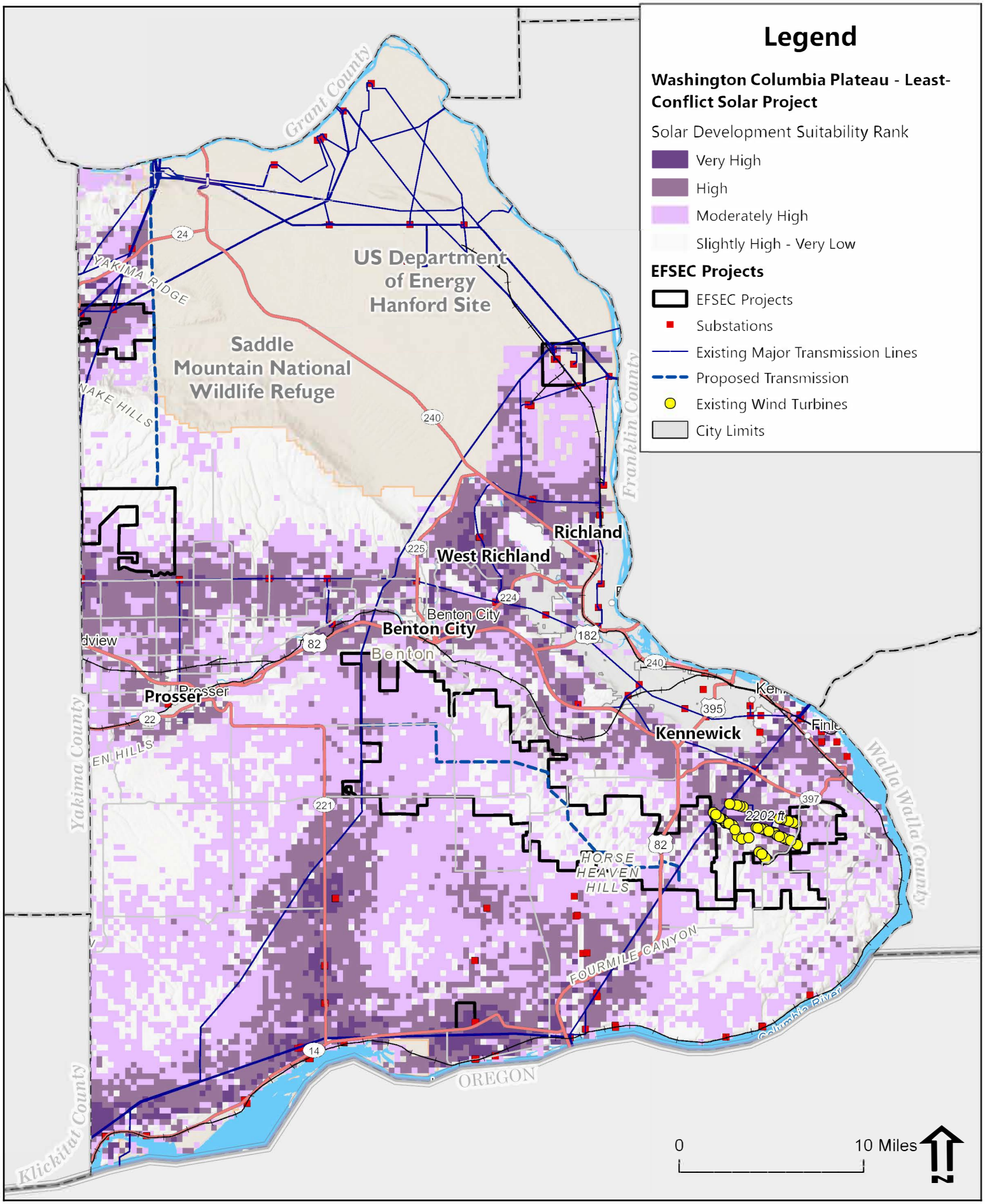
Figure A-12

Lower Conflict Analysis Scenario 3



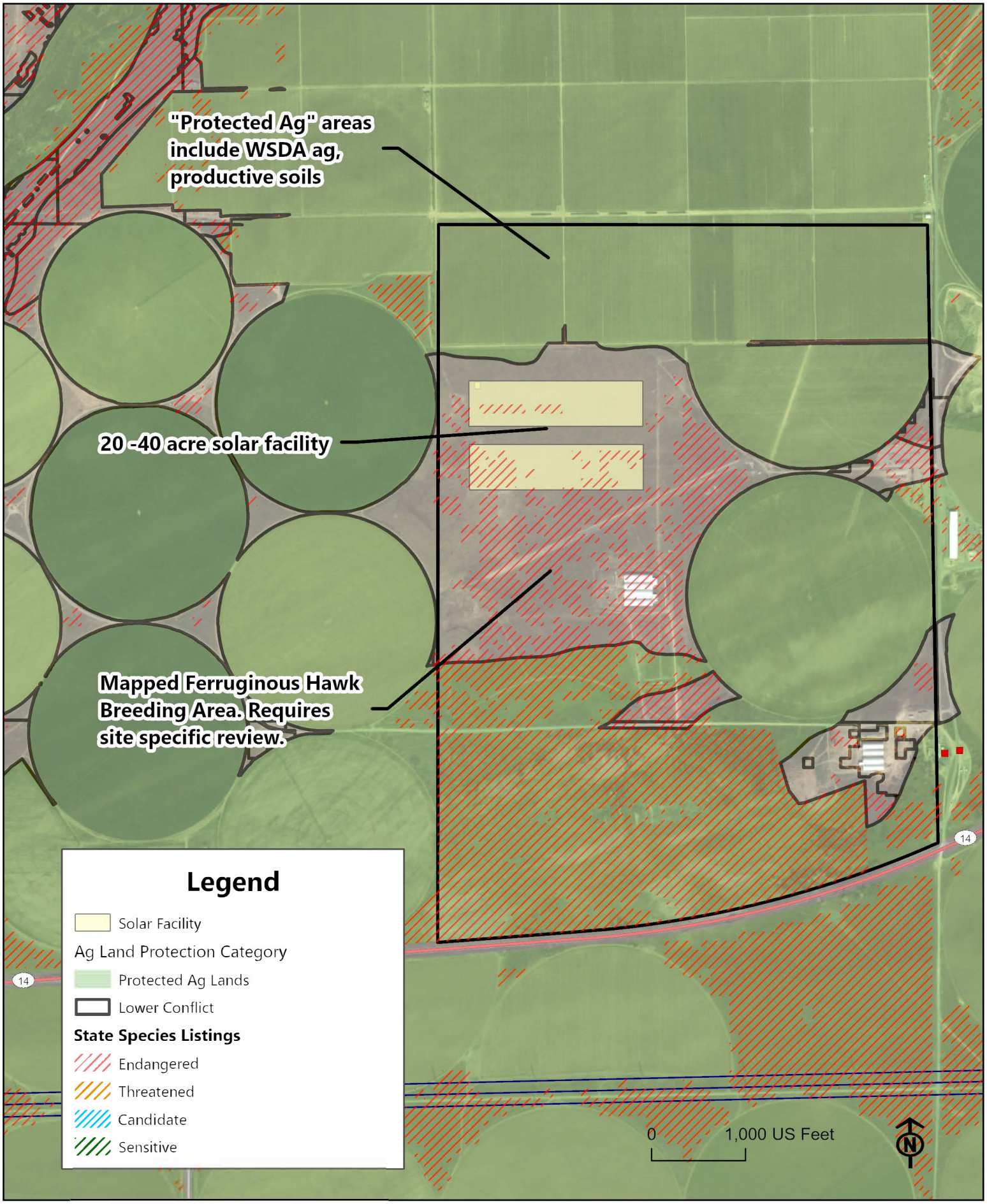
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Figure A-13
Scenario 3 with PHS & GHA



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Figure A-14
WSU Solar Suitability Ranking



AC GEO

Figure A-15
Example Site Map

Appendix B
WDFW Renewable Energy Siting Guidance - 2025

The Guidelines for Utility-Scale Solar and Onshore Wind Energy Development in Washington State, published September 30, 2025 can be found at https://wdfw.wa.gov/publications/02662

Appendix K
Key Findings from Agri-Tourism Meeting

Key Findings from April 2, 2026 Agri-Tourism Meeting

The workshop involved two participants from the local wine industry, Benton County Planning Staff, and the consultant team.

Onsite Food Service

- Regular onsite food is important to the overall viability of wineries/breweries/distilleries and can be key driver of winery sales and establishing long-term customers.
- Some wineries/breweries/distilleries are currently providing made-to-order onsite food service outside what is currently allowed under BCC 11.17.050 and have received Health Department approval for commercial kitchen facilities.
- Food plays a central role in the overall winery/brewery/distillery experience, with both meeting participants and survey responses emphasizing that visitors expect a cohesive, destination-oriented experience rather than a single-purpose tasting stop.
- Some wineries/breweries/distilleries are pairing food offerings with wines and are using locally sourced agricultural-related products as a significant part of this onsite food service and as seasonally available.
- Food availability is also seen as a safety consideration, as it reduces risks associated with consuming alcohol without eating.
- Food trucks generally will not come to wineries/breweries/distilleries unless there is an event to drive traffic or the winery/brewery/distillery guarantees a minimum earning that is not typically financially sustainable, so food trucks may not be a viable option for onsite food service

Overnight Accommodations

- There is adequate flexibility under the existing definition of Agritourism Accommodations, which allows up to 5 sites for – including RV sites (e.g., limited "dry camping" such as Harvest Hosts-type use), and factory-assembled structures. Small-scale standalone units (e.g., tiny homes or modular cabins) also fit within this framework and there are existing examples where this occurs in the GMA Ag Zone.

- The existing allowance for lodging within a commercial structure used primarily for processing beer, wine, spirits (up to 2 rooms, 800 sq. ft.) was not intended to serve as commercial overnight accommodation. However, use of these spaces could provide additional supplemental income for some wineries/breweries/distilleries.



Guest Cabin at Alexandria Nicole Winery - 2026

Broader Agritourism Activities

- Did not discuss

Table 2: Existing Agritourism Uses in Benton County Code

A = Allowed Acc = Accessory C=Conditional Use X=Prohibited

Activity *See attached definitions from BCC 11.03 for the listed Activities*	**RL-5**	**RL-20**	**GMA Agricultural**	**Red Mountain Agricultural**
Agricultural Stands	A	A	A	A[1]
Agricultural Markets – incidental and accessory to packaged food products and non food items	X	C	X	X
Bakeries	X	X	A[2]	X
Winery/Brewery/Distillery	A[3]	A	A	A
Wineries, brewery, distillery club events, winemaker or brewer dinners and regional promotional events.	X	X	Acc	Acc
Onsite food service that is clearly accessory to a Winery/Brewery/Distillery	X	X	Acc[4]	Acc
Overnight lodging within a structure primarily used for processing of beer, wine, or spirits	X	X	C[5]	C
Events Facility on the same or adjoining parcel as a Winery/Brewery/Distillery	X	X	C[6]	C
Non-agricultural accessory uses that promote or sustain the continuation of the agricultural uses of a parcel	X	X	C	C
Agritourism Accommodations	X	C	C	C
Bed and Breakfast Facility	C	C	C	C
Reception Facilities with capacity up to 200 attendees	C	X	X	X
Recreation and entertainment activities centered on an agricultural theme, ie. mazes, hayrides, sleigh rides, animal rides, petting zoos and other similar uses.	X	X	C	X

1. Allowed on parcels of 20 acres or more. Conditionally permitted on parcels less than 20 acres but greater than 2 acres.
2. On or adjacent to parcels with 80% producing a commercial grain crop
3. Allowed if <3,000 ft^2, otherwise Conditional Use
4. Commercially prepared or packaged, ready to eat appetizer-sized portions with limited prep, or catered food for events
5. Max 2 rooms, 800 ft^2, meet water, septic, building code requirements
6. Max 200 guests, does not interfere with ag use, within 1000 ft. of main structures, convert <1ac. Ag land, adequate parking, etc

Draft Revisions to Benton County Code

11.03.010 (196) "Wineries/Breweries/Distilleries" means facilities where fruit or other products are processed into wine or spirits and related storage, bottling, shipping, sampling, tasting and sale of such.

11.17.050 ACCESSORY USES. Provided all applicable code provisions are satisfied, the following uses are allowed as an accessory/ancillary use within the GMA Agricultural District:

(g) Food service that is accessory and subordinate to a Winery/Brewery/Distillery is allowed as limited in this section. Food services are intended to allow a Winery/Brewery/Distillery to pair food with the Winery/Brewery/Distillery product to enhance the Winery/Brewery/Distillery product's appreciation. The food service is to be conducted within existing spaces used for tasting or customer service and does not establish a separate, dedicated restaurant area or expand the existing tasting area to accommodate food service. All food services must be appropriately licensed and/or permitted by the Benton-Franklin Health District with respect to safe food handling and preparation. . Food services a may be present in the in the form of:

(1) On-site prepared food service shall not operate as a stand-alone restaurant or include restaurants or buildings with interior seating dedicated primarily to meal service and cooked to order meal service. On-site preparation of food is to be primarily available to customers participating in tasting or beverage-related activities with a limited scope menu intended to complement beverage offerings and/or showcase locally produced agricultural products.

(2) Service of commercially-prepared or packaged food items.

(3) Catered food service typically, but not exclusively, for Winery/Brewery/Distillery club events

(4) Food trucks, provided the food trucks are temporarily parked and providing services proximate to the Winery/Brewery/Distillery building.

(h) Retail sales establishment as an accessory use to a Winery/Brewery/Distillery including, trademark items, items which promote the region or the wine/beer/spirits industries,

other regional value-added agricultural products, art, prepackaged foods and cheese, or related.

(i) Winery/Brewery/Distillery club events, winemaker or brewer dinners and regional promotional events.

Onsite Food Service Guidance (Incorporated into Fact Sheet)

The following guidelines are intended to assist in determining whether particular food service practices are consistent with BCC 11.17.050(g). No single factor in this list is necessarily determinative of a winery's compliance or violation of BCC 11.17.050(g).

- Whether the food is tailored to the wine offerings and marketed as an accompaniment to the wine or is a stand-alone offering;
- Whether the winery offers a menu of diverse and substantial food options and/or provides defined meal service (e.g., lunch, dinner);
- Whether the winery consistently provides substantial food service, or instead reserves this service to special occasions, such as ticketed dinners or events described in BCC 11.17.050(i);
- Whether the predominant activity in the tasting room is dining as opposed to wine tasting, wine sales and related wine marketing;

Appendix L
Benton County Shrubsteppe and Wetland Prioritization Memorandum

MEMORANDUM

To: Ben Floyd, White Bluffs Consulting
From: Kelsi Potterf, Benton Conservation District
Date: 06/13/2025
Subject: Benton County Shrubsteppe and Wetland Prioritization

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Scope of Work

This memo summarizes the GIS services completed by Benton Conservation District in support of Benton County Shrubsteppe and Wetland Prioritization under subcontract agreement dated November 27, 2024 with White Bluffs Consulting. Deliverables include a description of processes and procedures conducted under the scope of work, a shapefile and maps of high-priority properties for protection and restoration, and an associated attribute table to include, at a minimum, parcel ID, acres, and rankings between value and function models.

Prioritized parcels work to fulfill the following objectives:

- Ease of acquisition—Parcels, fields, or patches should be fairly large (>50 ac) and should have few owners
- Relative Quality—Priority areas should be focused on those already in shrubsteppe, wetland/riparian, or other native plant community cover types and require little up-front management to maintain ecological functions
- Greatest impact—Identify those patches which, if protected or restored, would contribute to the following concepts:
    - Connect existing protected areas
    - "Protect the Core, Expand the Core, Connect the Core"
    - Consider connection and growth between ecosystem types

Reporting Period

January 1st, 2025 – June 30th, 2025

Tasks Completed

SHRUBSTEPPE PRIORITIZATION

1. **Data Collection and Review**
    - For the purpose of prioritizing shrubsteppe, data collection considered two categories:

1. Maps derived for values assessments, i.e., priority species presence, occurrence of shrubsteppe habitats, and landscape value.
2. Models developed to assess habitat function, i.e., biodiversity potential and resiliency to disturbance.

Table 1. Data layers and sources utilized in shrubsteppe prioritization.

Data Layer	Source	Year (s)
WSRRI Xeric & Mesic Landscape Priorities PHS Species Specific Occurrences PHS Eastside and Shrubsteppe PHS Columbia Plateau Regional BAC WDFW & Regional Partner Acquisition/Public Access Priorities	Washington Department of Fish & Wildlife	2020-2025
Boundary Parcels Urban Growth Boundary	Benton County	2024
Ag Land use Field Boundaries Possible CRP/Fallow Fields	Washington State Department of Agriculture	2023
Core and Linkages	Arid Lands Initiative	
Shrubsteppe Biodiversity Potential Model • LANDFIRE FBFM40 2020 • MRLC RCMAP Fractional Cover Layers 2020 o Annual Herbaceous o Perennial Herbaceous o Sagebrush o Non-Sage Shrub o Tree o Bare Ground o Litter • WDNR Ecological Integrity Assessment—Upland Ecosystems o Ecological Systems Key	Benton & Franklin Conservation Districts	2020

2. **Data Processing and Analysis**

Strategy:

- Isolate large parcels/fields (>50 ac) that contain shrubsteppe (SSBP) AND intersect multiple landscape conservation priorities (PHS/WSRRI/ALI) AND work to connect multiple habitat types and/or existing protected areas.

- Isolate large parcels/fields (<50 ac) that contain shrubsteppe (SSBP) AND intersect multiple landscape conservation priorities (PHS/WSRRI/ALI) AND work to connect larger areas previously selected and/or existing protected areas.
- Clean up polygons (edit layer) and recalc area
- Compare isolated polygons to the SSBP and code for management needs and intersecting priority layers.

Development:

Clip all layers to county boundary

Isolating Ag fields from Parcels (Allows the selection of polygons to retain parcel information around or specific to ag fields)

1. Clip Parcels to Fields
2. Merge Fields to clipped Parcels
3. Remove Fields from Parcels (Pairwise erase with outputs)
4. Merge the outputs from 2 and 3.
5. Split by WSDA Crop Layer (so you can select individual fields within a parcel)
6. Clean up attribute table to contain only pertinent information
7. Add field for acres and run geometry (US Survey Acres)
8. Add fields for management recommendations, priority intersects, and a sum of values to rank.
    a. WSRRI: Core =5; GOA=4; Corridor= 3; Other=2
    b. ALI: Core=3; Linkage=1
    c. PHS:
        i. Species: # of PHS spp possibly occurring
        ii. Steppe: Present=1; Absent=0
        iii. BAC: Bio/Core=5; Corridor=3
    d. SSBP: Good=5; Fair=3; Poor=1
    e. Landuse: Rangeland=3; CRP=1
    f. Partner Priorities: 1
9. Clip and convert all vector layers to polygon layers; add 100ft buffer to linear
10. Feature to point for isolated fields; Extract Multi Values to Points
    a. Batch process what is possible
    b. Use attribute table to calculate the previous fields
    c. Caveat—based on the location of the point, some extracted data may not reflect the intersect between layers unless the intersection is central to the polygon.

3. **Map Production**

- ArcGIS was utilized in the processing and development of resulting maps and models. See attached Benton County Shrubsteppe Prioritization map for a sample of outputs. Staff identified significant core and corridor areas—those parcels with low cumulative

value and function rank are shown in red/orange, while those high-priority parcels are provided in green tones.

4. **Deliverables Provided**

    - A Memo describing the work and major findings among primarily private lands
    - Shared folder via ArcGIS Online that includes a shapefile of the target parcels with an attribute table containing ranking/ownership information

5. **Meetings and Coordination**

    - Staff attended multiple meetings with White Bluffs Consulting, including those to evaluate the progress of deliverables and to provide updates to County and WDFW Staff.

Next Steps / Remaining Work

Should work continue to prioritize these parcels further, District staff would take the opportunity to run 2024 Shrubsteppe Biodiversity Potential Models and begin field validation, as well as assist in the evaluation of high-priority parcels for protection measures.

WETLAND/RIPARIAN PRIORITIZATION

6. **Data Collection and Review**

    - For the purpose of prioritizing wetland and riparian areas, data collection considered the challenges resulting in reduced accuracy among current wetland/riparian mapping efforts:

        1. Impacts of low precipitation (5-10” per year) and irrigation inputs on typical watershed hydrology.
        2. Limitations in resolution among national datasets impacting the ability of current models to detect riparian vegetation.
        3. The tendency for satellite imagery-based processing to classify farm ponds, manure lagoons, metal roofs, gravel pits/quarries, and irrigation infrastructure as open water.
        4. As irrigation methods become more efficient, and seasonal droughts increase in frequency and severity, we expect to see declines in the extent and abundance of wetlands and riparian areas across the landscape.

Table 2. Input and developed layers utilized in preliminary processing for wetland/riparian prioritization.

Input Layers	Source	Year (s)
Digital Elevation Models (DEM) Digital Terrain Models (DTM)	Washington Department of Natural Resources	2020

Boundary Parcels City limits Urban Growth Boundary Wetlands & Streams	Benton County (NWI & WDFW)	2018/2024
Developed Layers/Tools	**Purpose**	**Process**
Depth Grid Cuts & Dams Streamflow Network Farm pond digitization ArcGIS Field Maps	Topographic barriers to flow; Culvert identification Ephemeral wetland potential Alignment of streams in topographic lows Reducing "false positives" in wetland mapping Field validation of questionable farm ponds	Agricultural Conservation Planning Framework (ACPF)
Further applications	Alignment of floodplains in valley bottoms Assessment of riparian condition Siting of conservation practices	ACPF; Riparian Condition Assessment Tool (RCAT)

7. **Data Processing and Analysis**
    - DEM/DTM data was processed prior to the receipt of contracted services.
    - Staff began the process of hydroconditioning the DEMs by HUC12 watershed. This involved filling pits, identifying topographic lows and confined basins, topographic dams and culverts, and navigating the flow paths more accurately as they navigate through irrigation infrastructure and roadways. Staff completed 2 rounds of hydroconditioning on 3 of the 6 tributary watersheds where intermittent/perennial flows have been identified.
    - Staff additionally digitized farm ponds and constructed wetlands throughout Benton County. Features with questionable origins or wetland functions were flagged for field validation. ArcGIS Field Maps were created for future use in windshield surveys.
8. **Map Production**
    - ArcGIS was utilized in the processing and development of resulting maps and models. See attached Benton County Streamflow Network & Farm Ponds map for a sample of outputs.
9. **Deliverables Provided**
    - A Memo describing the work and what has been completed in the processing of wetland/riparian features
    - Shared folder via ArcGIS Online that includes a shapefile of the digitized farm ponds and revised streamflow networks for completed HUC12's.
    -
10. **Meetings and Coordination**

- Staff attended multiple meetings with White Bluffs Consulting, including those to gain an understanding of valuable tools for shoreline assessments.

Next Steps / Remaining Work

Should work continue to evaluate priority wetlands and riparian areas, District staff would take the opportunity to continue building accurate streamflow networks, field validate 20% of identified wetlands and farm ponds, and run the RCAT model to identify high-priority riparian areas for protection and restoration.

Please let me know if any additional information or clarification is needed. I appreciate the opportunity to support this project.

Sincerely,

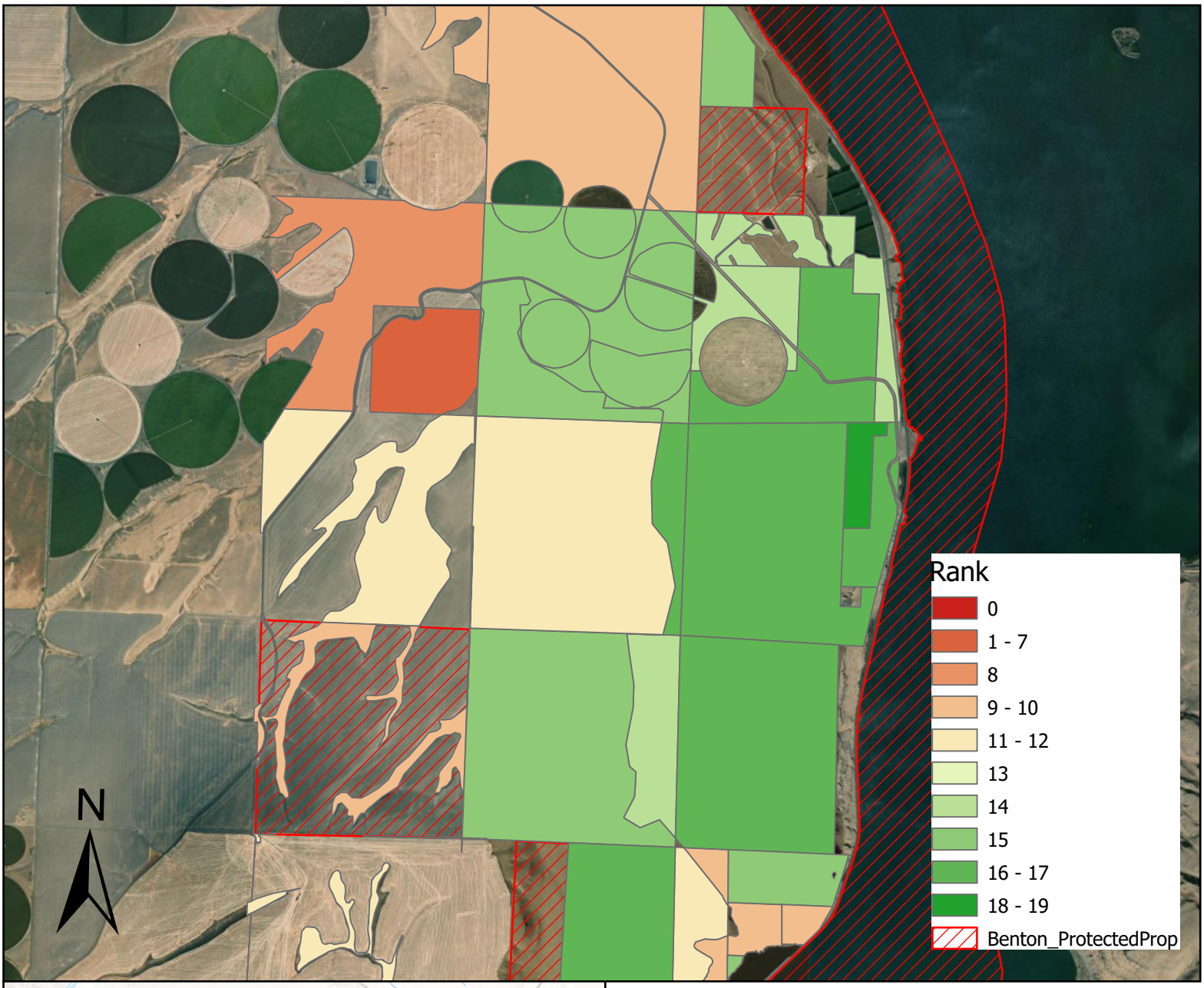
Kelsi Potterf

Voluntary Stewardship Program Coordinator

Benton & Franklin Conservation Districts

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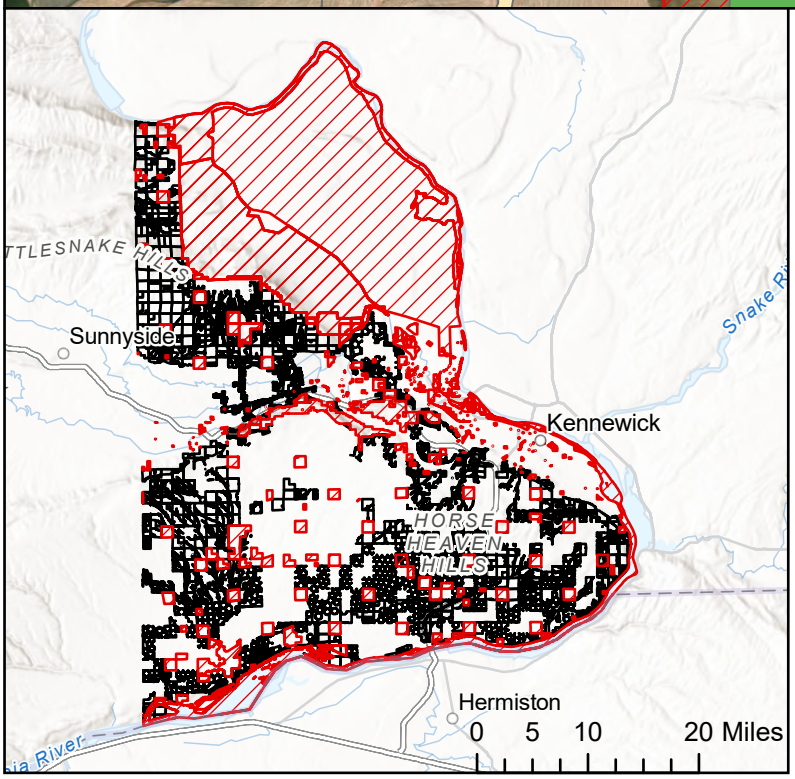
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Benton County Shrubsteppe Prioritization Protection and Restoration

White Bluffs Limited Professional Services Contract



Kelsi Potterf

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06.13.2025

Benton Conservation District

Appendix M
Open Space Corridors Memorandum

Final Draft Memorandum

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

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

Date: August 23, 2025, Update October 23, 2026

Re: Open Space Corridors

Introduction

This memorandum supports Benton County's 2026 Comprehensive Plan Periodic Update by addressing requirements to identify open space corridors. The Growth Management Act (GMA) mandates the identification of open space corridors within and between urban growth areas.[1] Open space corridors include lands useful for recreation, wildlife habitat, trails, and the connection of critical areas. Identification and protection of open space supports multiple goals identified in the Comprehensive Plan, including protecting and linking habitat and other critical areas,[2] promoting outdoor recreation,[3] preserving rural character,[4] and conserving unique scenic landscapes.[5] This memorandum supports existing County plans and programs focused on open space lands.

The purpose of this memorandum is to:

1. Review applicable statutory requirements and regulations for protection of open space corridors and summarize ways that Benton County is currently meeting the requirements outlined in the GMA.
2. Identify the extent of open space corridors within and between UGAs.
3. Characterize the environmental functions and patterns of use within identified open space corridors.
4. Review strategies to align protection of open space corridors with other policies and plans and make applicable recommendations.

[1] RCW 36.70A.160 - Identification of open space corridors—Purchase authorized
[2] Comprehensive Plan CA Goal 4
[3] Comprehensive Plan TE Goal 2, PL Goals 1, 2, 3
[4] Comprehensive Plan LU Goal 6
[5] Comprehensive Plan PL Goal 3

Legal & Policy Framework

The Growth Management Act (GMA) lists the retention of open space as one of fifteen "Planning Goals," and requires jurisdictions to identify open space corridors to "e*ncourage the retention of open space and development of recreation opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks"* (RCW 36.70A.020(9)).

RCW 36.70A.160 requires counties and cities planning under the GMA to identify open space corridors within and between urban growth areas, including lands useful for recreation, wildlife habitat, trails, and the connection of critical areas. The statute clarifies that corridor designation does not restrict ongoing agricultural, or forest uses unless the jurisdiction acquires sufficient interest to limit development or resource use.

WAC 365-196-335 outlines requirements for protecting open space corridors and provides recommendations for implementing this statutory obligation. Counties and cities must identify open space corridors and may acquire land or lesser interests using available conservation funding. The rule also recommends that local governments do the following:

a. consider identifying open space corridors when reviewing and updating urban growth areas, critical areas designations, and the land use element of comprehensive plans.

b. consider the various purposes and uses of identified corridors, and state the preferred uses anticipated for identified corridors.

c. consider how identified corridors exist in relationship to designated critical areas and natural resource lands, the extent and trends of public demands for recreational lands and access to public lands for recreation, and specific existing and planned recreational uses that may make use of identified corridors for specific uses, including nonmotorized transportation.

d. plan an integrated system of open space that uses identified corridors to link established large areas of open space such as parks, greenbelts, streams, and wildlife corridors

e. consider the potential to use vegetated green spaces as part of an integrated system to absorb and treat stormwater.

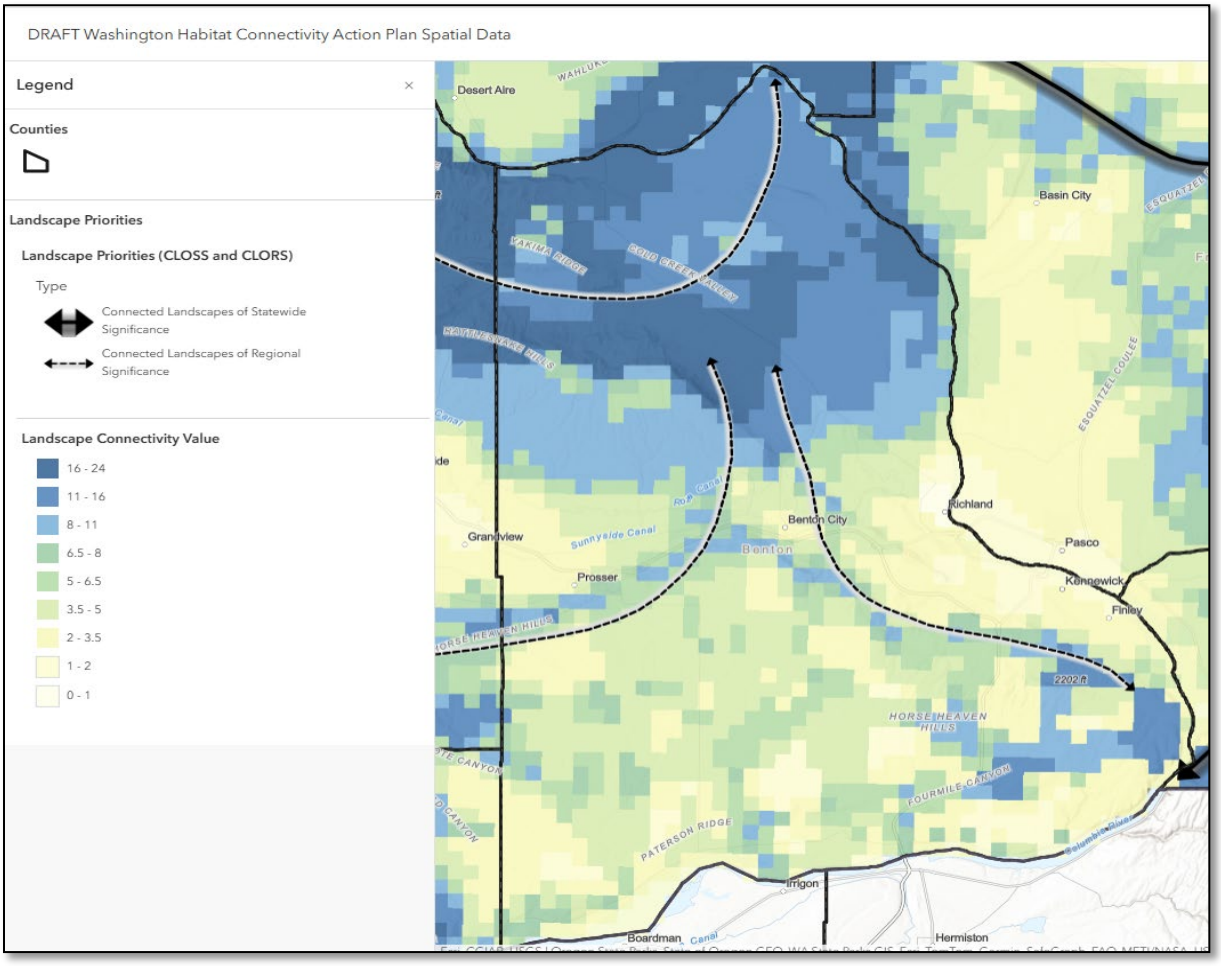
State Agency Guidance

Washington Department of Fish and Wildlife (WDFW) Habitat Guidance

Benton County contains protected habitats that are prioritized in various guidance and plans. WDFW's Priority Habitats and Species (PHS) Program provides key fish, wildlife, and habitat information to inform land use decisions. Opens space corridors that serve as biodiversity corridors and core habitat areas are mapped as PHS. WDFW's Washington Habitat Connectivity Action Plan (WAHCAP) is a statewide strategy (currently in draft status) that guides habitat

connectivity planning by mapping key wildlife corridors and identifying priority areas to reconnect important landscapes. The Arid Lands Initiative (ALI) is a habitat conservation and recovery program that identifies priority areas for landscape-scale conservation and restoration within the Columbia Plateau Ecoregion, including "Priority Core Areas" and "Priority Linkage Areas". The Washington Shrubsteppe Restoration and Resiliency Initiative (WSRRI) builds on the ALI and identifies core and corridor areas for shrubsteppe and other habitats. Guidance and spatial data from the PHS dataset, WAHCAP, ALI, and WSRRI were incorporated into the analysis of open space.

Figure 1: WDFW Habitat Connectivity Action Plan Spatial Data – Benton County



Critical Area and Shoreline Guidance

The Washington State Department of Ecology's Wetland Guidance for CAO Updates (2022) emphasizes the protection of wetland functions—such as water quality, flood storage, and habitat connectivity—and supports the integration of wetlands into broader land use planning frameworks. Ecology's SMP Handbook (2017) also offers guidance on shoreline vegetation conservation, recommending buffer and setback standards to preserve ecological functions, reduce flood risks, and maintain habitat - reinforcing the importance of vegetated open spaces. The extent of shorelines and critical areas were incorporated into the open space analysis.

Benton County Open Space Plans and Policies

Benton County has existing plans and policies that accomplish many of the requirements and recommendations for identification of open space in RCW 36.70A.160 and WAC 365-196-335. These include the Benton County Comprehensive Plan, Comprehensive Parks Plan, Shoreline Master Program (SMP), Critical Areas Ordinance (CAO), and the Voluntary Stewardship Program (VSP) Work Plan. The open space priorities in this document align with those programs.

Parks, Recreation, and Trails

The Benton County Comprehensive Parks Plan, adopted in 2014 and scheduled for update in 2025, identifies parks and other recreation areas, characterizes their public use, considers linkages between sites and critical areas, and presents strategies to improve connectivity[6].

Critical Areas and Shorelines

The County's SMP is focused on protecting the functions and values of designated shoreline areas, including riparian corridors, floodplains, and wetlands, and applies specific standards for vegetation conservation, buffers, and public access. The CAO also identifies and regulates critical areas, many of which form or overlap with open space corridors. The VSP Work Plan supports the protection of critical areas on agricultural lands and identifies priority areas where conservation practices can maintain or enhance open space values such as vegetated buffers.

Shrubsteppe Protection and Recovery

Benton County and the Benton and Franklin Conservation Districts are developing a shrubsteppe mitigation bank and in-lieu-fee (ILF) program to allow compensatory mitigation for shrubsteppe impacts through a structured crediting system. The Benton Conservation District has created a shrubsteppe biodiversity potential model to prioritize shrubsteppe habitat for protection and restoration to inform the mitigation program and other protection efforts.

Current Comprehensive Plan

Open space is addressed in several sections of the existing Comprehensive Plan. The Comprehensive Plan includes a range of goals and policies related to parks, open space, and natural resource protection, including:

- Preserving rural character through protection of open spaces and low-impact recreation (LU Goal 6, Policy 4, p. 14).
- Integrating natural features—such as rivers, ridges, and slopes—into a connected system of open lands (CA Goal 4, Policy 2, p. 23).

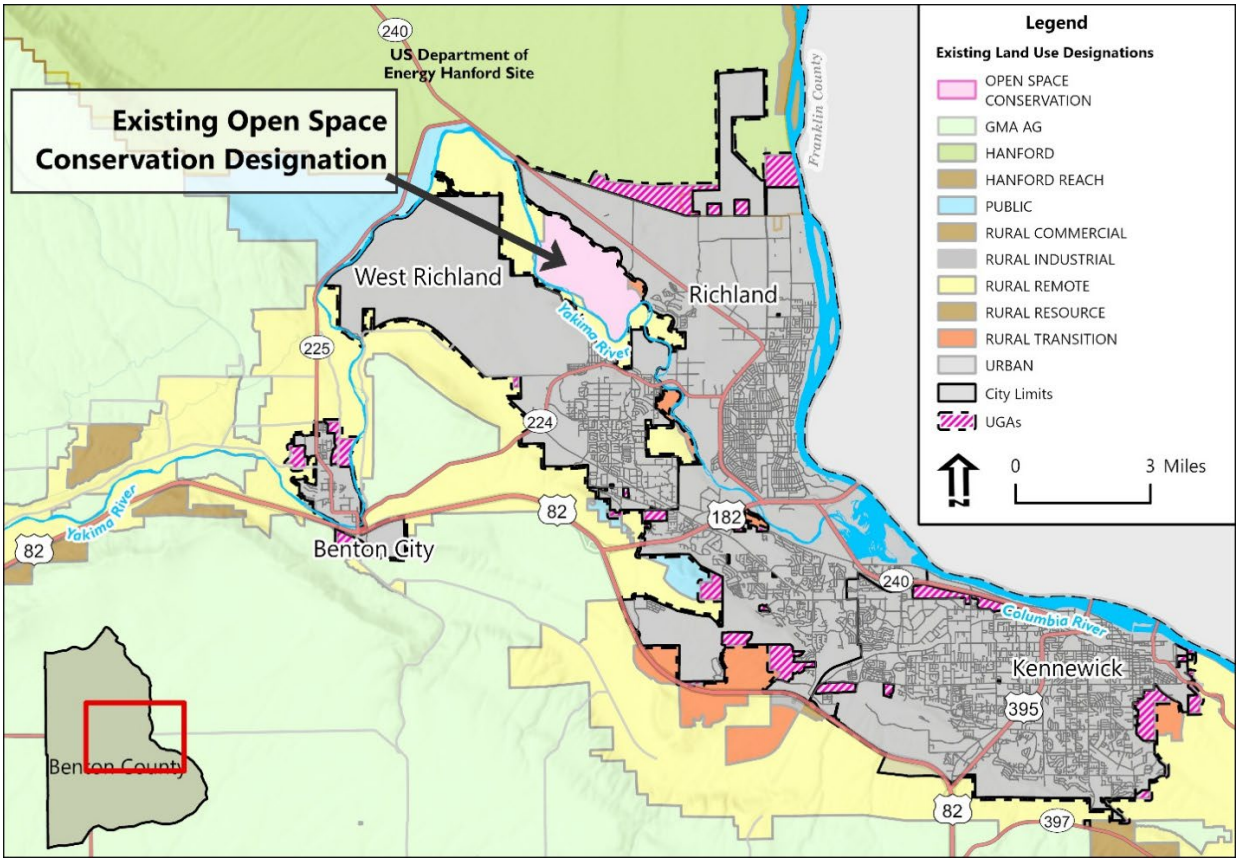
[6] Benton County Comprehensive Parks Plan, p. 26

- Expanding non-motorized transportation options, including trails for hiking, biking, and equestrian use (TE Goal 2, Policy 1, p. 27)
- Developing and maintaining a regional park and trail network that links with city networks (PL Goal 1, Policy 1, 2, 3, 4, p. 28)
- Working with cities and agencies to protect greenways and open spaces along the riverine corridor of the lower Yakima River and considering acquisitions as part of the park system (PL Goal 2, Policy 1 & 2, p. 28).
- Conserving visually prominent vegetated steep slopes and elevated ridges of the Columbia Basin Landscape (PL Goal 3, Policy 2, p.29).
- Using tools such as conservation easements, area plans, and land acquisitions to protect critical areas and scenic ridges, specifically Red, Candy, and Badger Mountains and the Horse Heaven Hills (Goal 3, Policy 3, p. 29).

Current Open Space Land Use Designations

The current land use designations in the Comprehensive Plan include an "Open Space Conservation" designation. The County currently has one area encompassing approximately 2,169 acres designated as Open Space. The area currently designated as Open Space Conservation is shown in Figure 2.

Figure 2: Existing Open Space Land Use Designations



Mapping & Inventory of Open Space Corridors

GIS Methodology

Open space corridors were identified using a GIS-based analysis focused on open lands located within and between UGAs. The analysis focused on:

1. **Habitat**, with a focus on mapped core areas and wildlife corridors
2. **Critical areas** (other than habitat) providing functions such as flood storage and filtration
3. **Linkage routes** providing existing or potential connections to larger open spaces, supporting trail connections, and multimodal access.

Habitat data sources included PHS biodiversity areas and corridors as well as species and ecosystem specific areas such as shrubsteppe, talus slopes, and inland sand dunes. Habitat analysis also included the WSRRI and ALI datasets to identify and prioritize habitat cores and corridors. Other critical areas—such as wetlands, floodplains, and steep slopes—were included due to their role in sustaining ecological functions and protecting public safety. Infrastructure features—including highways, local roads, railways, and canals—were also evaluated for their potential to support multimodal transportation and trail corridors. A full list of GIS data sources is provided in Table 1.

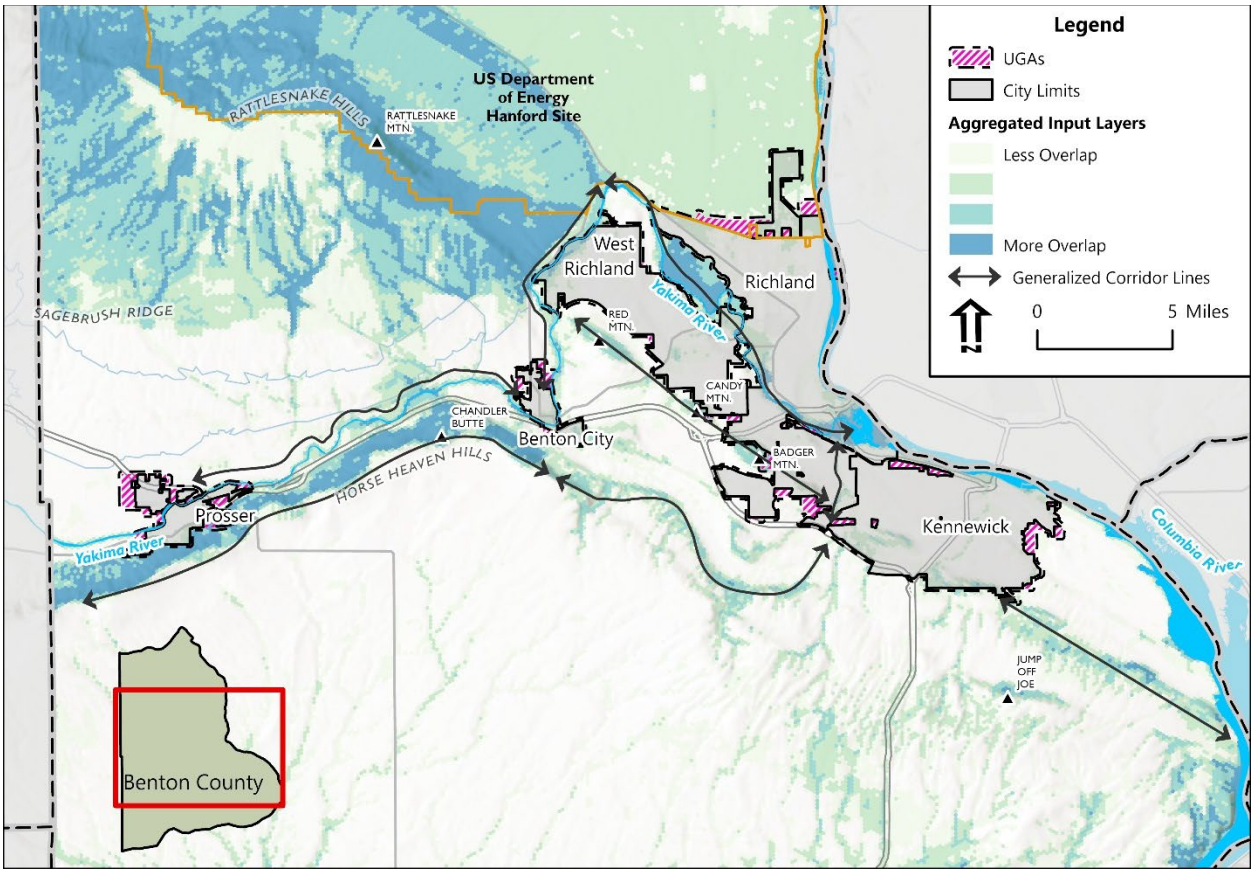
Table 1: GIS Data Sources

GIS Layer	Source
Public land parcels	WA Geospatial Open Data Portal
Conservation Easements	Natl. Conservation Easement Database
Federal & State Highways – 100′ ROW	Benton County GIS
Floodplains	Benton County GIS
Wetlands	National Wetlands Inventory
Shoreline Jurisdiction	Benton County GIS
Critical aquifer recharge areas	Benton County GIS
County roads – 60′ ROW	Benton County GIS
Canals & aqueducts – 60′ corridor	Benton County GIS, DNR Hydrography
Geologically hazardous areas	Benton County GIS
Railroads – 100′ ownership	WA Geospatial Open Data Portal
Public Trails	Benton County GIS, OpenStreetMap
WDFW Priority Habitats & Species (PHS)	WDFW
WSRRI Cores, Corridors, Growth Opportunity Areas	WDFW
Arid Lands Initiative Habitat Cores & Corridors	Arid Lands Initiative
Summits, fault lines and geologic uplift formations	USGS, WA DNR

Many of the open space input layers overlap on the landscape, as open space areas often serve multiple functions related to habitat and environmental processes. The GIS analysis first aggregated the input layers to identify areas of convergence. The initial analysis was followed by a desktop review using supplemental sources such as habitat and critical area guidance, park and trail plans, and GIS metadata to interpret spatial patterns and identify and characterize open space corridors.

Because the input data varied in scale, resolution, and accuracy, results were aggregated and generalized into a consistent resolution to support uniform evaluation across the study area. Figure 3 illustrates the generalized input data and the corridor network defined from further review. Maps showing all input data are included in Appendix B.

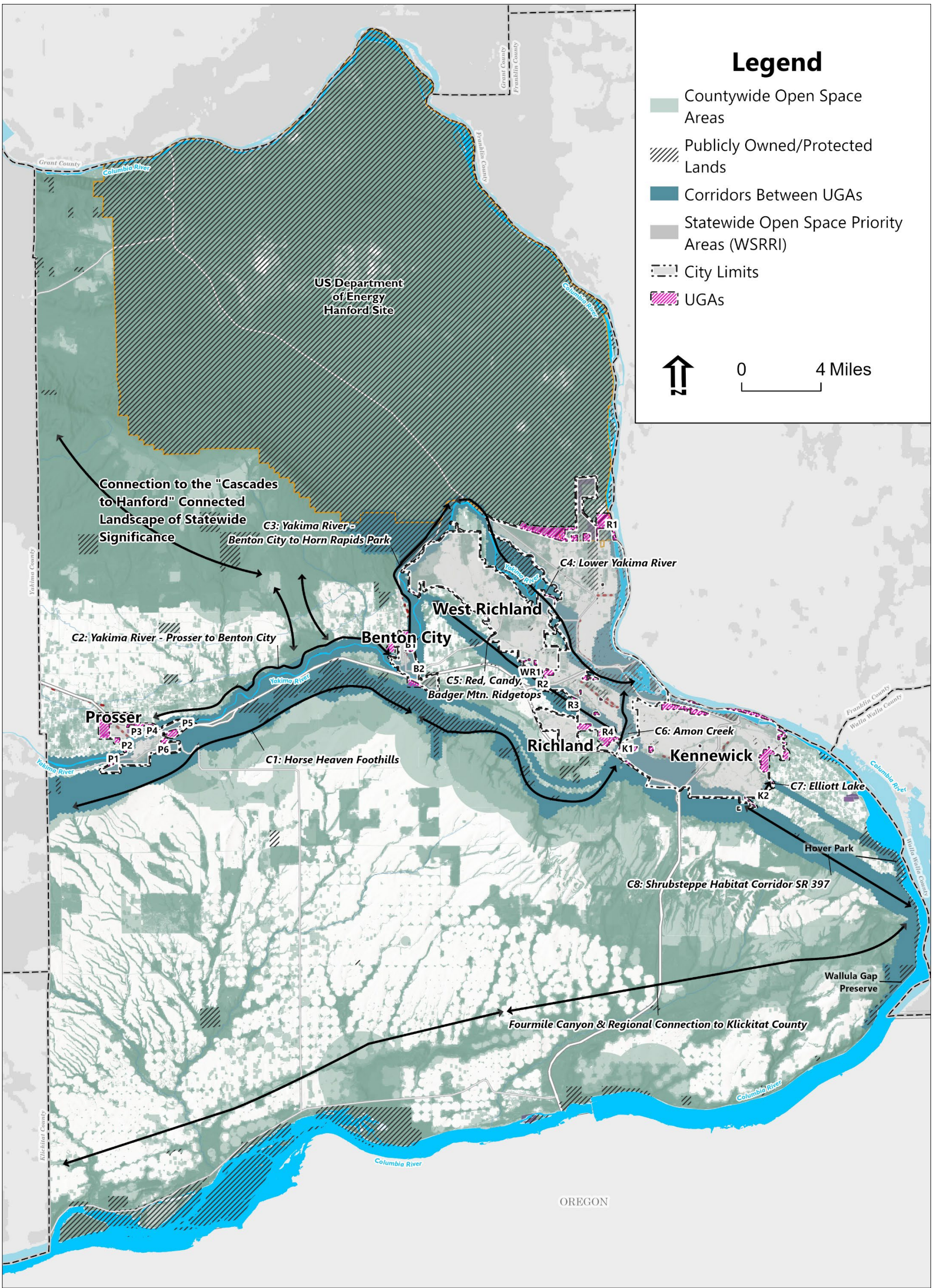
Figure 3: Aggregated Open Space Input Layers & Generalized Corridors



Analysis Conclusions

The primary open space corridors between UGAs are located along ridgelines of the Horse Heaven and Rattlesnake uplift formations and the Yakima River corridor. Smaller linkages also exist along highways, rail, and canal rights of way. The identified corridors generally overlap and align with other programs, plans, and mapping efforts, such as the ALI, PHS, WSRRI, and WAHCAP data and the Benton County Parks Plan. The open space corridors were identified and labeled based on unifying landscape characteristics or geographic features—such as ridgelines, highways, or river corridors—that help define each area's role within the broader open space network. The open space areas within and between UGAs are summarized in Table 2 beginning on page 15. While the analysis focused specifically on open space within and between UGAs, these strategies can also be used to identify other open space lands throughout the County. A map showing countywide open space corridors and linkages to larger, regionally important areas , is shown in Figure 4.

Figure 4: Countywide Open Space Corridors Map



Data Sources: Benton Conservation District, FEMA, WDFW, US Fish & Wildlife Service, Benton County GIS, Washington DNR,Esri, CGIAR, USGS, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

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Corridor and UGA Map

Benton County Comprehensive Plan

Identified Open Space Corridors

The GIS analysis identified eight primary open space corridors within and between UGAs. Descriptions of each corridor are included below and summarized in Table 2 on page 15.

C1: Horse Heaven Foothills



Horse Heaven Hills Photo Credit: US BLM

This corridor runs along the Horse Heaven geologic uplift formation south of I-82 and is characterized by steep slopes and shrubsteppe habitat. This area serves as a regionally significant wildlife habitat corridor, identified across several mapping efforts including WAHCAP, WSRRI, ALI, and shrubsteppe biodiversity potential modeling. The corridor supports lower-intensity outdoor recreation and trail use in areas, such as the Horse Heaven Hills Recreation Area. Large portions of this corridor are in public ownership, including a large contiguous block of public land near Chandler Butte managed by the BLM and the Washington DNR. There are opportunities to protect the corridor through land acquisitions, easements, and statutory protection tools aimed at preserving and restoring shrubsteppe habitat and biodiversity. The eastern portion of the corridor has opportunities for trail development along existing rail or canal corridors, connecting non-motorized use - from Benton City through Badger Canyon to Kennewick.

C2: Yakima River Corridor - Prosser to Benton City

This corridor follows the Yakima River floodplain and designated shoreline areas between the cities of Prosser and Benton City. The Yakima River is designated as a shoreline of statewide significance, and the river itself and surrounding buffer vegetation form an important habitat corridor for fish and wildlife, The corridor is mostly under private ownership with limited public access except via the river itself. A desire for trail access along this corridor was identified in the Benton County Comprehensive Parks Plan.[7]

C3: Yakima River Corridor - Benton City to Rattlesnake Hills and Horn Rapids

This corridor extends north along the Yakima River from Benton City through Horn Rapids County Park. It also connects to Rattlesnake Slope Wildlife Area and the Rattlesnake Mountain Shooting Facility. The Rattlesnake Slope Wildlife Area has a network of hiking trails and provides further habitat linkage to the Saddle Mountain National Wildlife Refuge. Horn Rapids Park offers over 800 acres of transitional river-to-upland shrub-steppe habitat, with an extensive trail network and

[7] Benton County Comprehensive Parks Plan, p. 28

group day use and camping facilities. The Tapteal Trail provides non-motorized access along the Yakima River.

C4. Lower Yakima River

The Lower Yakima River Corridor encompasses a diverse set of protected habitats and greenbelt areas including restored wetlands, riparian buffers, and shrubsteppe habitat. The upper section includes a large wetland complex protected under the federal Wetlands Reserve Program and designated as Open Space Conservation in Benton County's current land use designations. The downstream portion within the City of Richland encompasses the Chamna Natural Preserve, a 276-acre public park with over 11 miles of trails. The Tapteal Trail also provides non-motorized connectivity throughout the corridor, linking neighborhoods and urban centers to natural areas. The corridor supports a broad range of critical ecological functions and is already well-integrated into Benton County's open space network. However, there are further opportunities to conserve properties with important riparian buffer functions on private property within the city.

C5. Red, Badger, and Candy Mountain Ridgetops

This corridor includes the ridgeline systems of Red Mountain, Candy Mountain, Badger Mountain, and Little Badger Mountain, forming an interconnected open space network adjacent to the West Richland, Richland, and Kennewick UGAs. The corridor contains popular trail systems used for hiking, biking, and horseback riding, while also supporting areas of relatively undisturbed shrubsteppe habitat. Recreational pressure is relatively high due to proximity to urban neighborhoods. Ownership along this corridor is interrupted by roads such as SR 224 and US 182 and privately owned parcels. Red Mountain is surrounded by more intensive agricultural use – primarily vineyards – and is not part of the existing public trail network. There are opportunities to pair future trail expansion with localized agritourism in and around the Red Mountain American Viticulture Area, and possibly other areas that could be connected to the ridge trail network.



Badger Mountain Trailhead. Photo Credit: Wikipedia Commons

C6. Amon Creek Corridor

The Amon Creek/Badger Drain riparian corridor forms an urban greenway and open space link between portions of the Richland and Kennewick UGAs as it flows north to the Yakima River Delta. The area includes the Amon Basin Preserve and a loop trail system, and contains riparian, wetland, and shrubsteppe habitats. Parts of the corridor are under public ownership (City of Richland), with other portions in private ownership, including a portion within Meadow Springs Country Club.



Amon Creek Natural Preserve in Richland.

C7. Elliott Lake Corridor

Elliott Lake is a spring-fed lake located in a residential area, with surrounding forested buffers and wetlands that provide habitat for wildlife and support important ecological functions. Although there are no public trails or formal access points currently identified, the area's natural features form a small open space corridor connected to the Kennewick UGA.

C8. Shrubsteppe Habitat Corridor along SR 397

This corridor follows a band of shrubsteppe habitat and steep slopes extending southeast from Kennewick toward Hover Park and the Wallula Gap Preserve. It is bisected by SR 397 and includes designated PHS biodiversity corridors and mapped WSSRI habitat, including mesic and Sage Grouse habitats. The corridor currently has limited public access and no formal trail systems are in place.

Recommendations

1. **Consider Open Space Conservation or Public Lands designations for publicly owned parcels adjacent to Candy Mountain Preserve, and for appropriate DNR and BLM owned parcels in Badger Canyon and the Horse Heaven foothills.**

   Two parcels with the Candy Mountain Preserve – one owned by the BLM, and one by the City of West Richland – are currently designated Rural Remote. Benton County should coordinate with the City of West Richland the BLM and consider designating these parcels as Public Lands or Open Space Conservation. An overview map of the parcels is included in Appendix A-1.

   Benton County should also consider Open Space Conservation or Public land use designation for an open space site in the Badger Canyon area. The site includes two publicly owned parcels totaling 429 acres, consisting of 269 acres owned by DNR and 160 acres owned by BLM. The properties contain valuable shrubsteppe habitat and could provide non-motorized recreation opportunities such as mountain biking (analog and Class 1 e-bike), hiking, and horseback riding. A map of the parcels is included in Appendix A-3.

   Benton County should also pursue appropriate open space protection and habitat restoration strategies for 7,015 acres of publicly owned land in the Horse Heaven Hills, located south of I-82 between Prosser and Benton City. These lands, managed by the BLM and DNR, form a critical habitat corridor characterized by extensive shrubsteppe and include areas identified as Biodiversity Corridors and Core Areas by the WDFW PHS and WSRRI spatial datasets. Protection of this area would maintain ecological connectivity while providing opportunities for low-intensity outdoor recreation, such as hiking on designated trails at low densities. A map of the parcels is included in Appendix A-4.

2. **Work with the appropriate cities to identify and protect identified open space resources within and between UGAs**

   Work collaboratively with cities to integrate identified open space corridors and resources into their planning frameworks, including comprehensive plans, parks and recreation plans, critical areas ordinances, and zoning codes. Encourage the use of local tools such as land use designations, park and open space dedications, and conservation incentives to support the protection and enhancement of open space within UGAs, and connections between UGAs within cities. Specifically, coordinate with Cities to apply appropriate designations to parcels within and adjoining Candy Mountain Preserve and Badger Mountain Centennial Preserve within the West Richland and Richland UGAs

3. **Implement a variety of tools to protect open space**

   Use conservation easements, land acquisitions, land swaps, and statutory requirements to expand and protect open space corridors. Prioritize areas with multiple benefits based on key datasets (WSRRI, WAHCAP, shrubsteppe biodiversity potential, parks plan, etc.). A list of potential protection mechanisms is included below for reference.

Direct Acquisition Tools

- Market Value Purchase: Purchase land at appraised fair market value.
- Bargain Sale: Acquire land below market value, allowing tax benefits for the seller.
- Life Estate or Bequest: Secure future ownership while allowing continued use.
- Gift Deed: Record a deed transferring property upon the owner's death.
- Option to Purchase Agreement: Secure future acquisition rights with pre-set conditions.
- Right of First Refusal: Obtain the opportunity to match any purchase offer when a property is put up for sale.

Conservation Easements and Dedications

- Conservation Easements: Permanently limit development to protect natural or recreational values while retaining private ownership.
- Access Easements: Secure public trail or recreation access across private lands.
- Park/Open Space Dedications: Require land set-asides or in-lieu fees as part of development review.

Landowner Incentive and Planning Tools

- Current Use Taxation *(RCW 84.34):* Leverage open space tax programs to reduce holding costs and support voluntary conservation.

Partner-Based and Alternative Tools

- Land Trust Partnerships: Work with non-profits (e.g., land trusts) to acquire or steward conservation lands.
- Utility & Transportation Corridor Agreements: Coordinate with utility providers to allow open space or trail use in managed corridors.
- In-lieu Fee Impact Mitigation Program: Leverage third-party programs where developers pay a fee to offset habitat impacts—such as shrubsteppe loss—through off-site conservation or restoration actions managed by qualified sponsors (e.g., mitigation banks or local governments).

4. Coordinate prioritization of high-value parcels.

Work with Cities and other partners such as DNR, WDFW, and Benton Conservation District to develop a ranked list of priority parcels for protection, using clearly defined evaluation criteria and the best available habitat and landscape data. Incorporate spatial information and modeling of shrubsteppe habitat quality into decision making.

5. **Incorporate compatible outdoor recreation planning.**

   Promote recreation that aligns the type and intensity of public use with habitat sensitivity, ensuring protection of ecological functions. Incorporate these strategies into the Benton County Parks Plan, especially in areas within and near UGAs and designated wildlife areas along corridors

6. **Enhance trail connectivity and multimodal access.**

   Explore opportunities to acquire trail easements, particularly along rivers, within existing rail and highway rights-of-way, or across strategic open space corridors. These connections can support regional trail continuity and improve non-motorized access. Work with irrigation districts to avoid trespassing but provide appropriate limited access to open spaces that may be adjacent to irrigation canals.

7. **Support agriculture and agritourism through trail integration.**

   Explore trail connectivity projects to enhance access to value-added agricultural destinations and agritourism opportunities. For example, connecting multimodal trails to the Red Mountain American Viticultural Area (AVA) can promote both outdoor recreation and agritourism development. Coordinate with agricultural stakeholders to identify mutually beneficial trail opportunities, ensuring trail alignments and usage avoid negative impacts to farm operations and enhance visibility for local producers.

8. **Integrate open space planning with wildfire risk reduction.**

   Align open space protection with Community Wildfire Protection Plans (CWPPs) and Wildland-Urban Interface (WUI) strategies. Protecting natural open space in strategic buffers can reduce fire risk to nearby communities while maintaining habitat and recreational functions, but un-managed vegetation can also pose a wildfire risk. Balance and integrate fuel modification with habitat and open space management to reduce the potential for conflicts between safety and environmental goals. Prioritize vegetation management and fuels reduction within open space areas, consistent with best management practices, as an appropriate measure to mitigate wildfire hazards.

9. **Integrate open space protection into climate resilience strategies.**

   Incorporate open space corridors and natural lands into both the climate resilience and emissions reduction sub-elements of the Comprehensive Plan. In the resilience sub-element, open space areas—such as riparian buffers, floodplains, shrubsteppe habitat, and vegetated ridgelines—play a critical role in mitigating climate-related hazards. These areas help reduce the urban heat island effect, absorb stormwater, and preserve groundwater recharge. In the emissions reduction sub-element, protecting and enhancing open space supports carbon sequestration in soils and vegetation, reduces vehicle miles traveled by enabling non-motorized trail networks, and supports compact urban growth patterns by establishing natural growth boundaries.

Table 2: UGA Open Space Descriptions & Corridors Inventory Table

Areas (UGA, Corridor)	Map #	Open Space Description	Public access demand & trail use	Linkage to larger open space areas	Critical areas (non PHS)	Habitat Core/ Corridor (PHS or WSSRI)	Shrubsteppe Habitat	Riparian Tree/Shub Canopy	Protection Status and Enhancement opportunities
Prosser UGA	P1 - P5	UGA intersection with Yakima River shorelines and floodplain with connections to railroad and highway rights of way.	No public access except from the water, no known trails		Yes			Yes	Protection through existing Shoreline and Critical Areas regulations and VSP on Ag lands. Monitoring tools in place to ensure no net loss of functions and values.
	P6	UGA intersection with shrubsteppe habitat, biodiversity corridors, steep slopes south of SR 221 near the intersection with SR 22.	No public access or trails	Yes	Yes	Yes	Yes		None identified at this time
Horse Heaven Foothills Corridor	C1	Horse heaven foothills running East- West on the south side of I-82. Characterized by shrubsteppe habitat, serving as a regionally significant wildlife corridor (see WSRRI and WAHCAP spatial data for reference). Corridor	Lower intensity trail systems in Horse Heaven Hills Recreation Area. Preference for low density/intensity recreational use due to habitat value.	Yes	Yes	Yes	Yes		Over 7,000 acres are protected by existing contiguous blocks of public lands surrounding Chandler Butte, managed by BLM and DNR. Opportunities for additional acquisition and restoration of shrubsteppe habitat throughout the corridor. Pursue a variety of means and mechanisms such as conservation easements, land acquisitions and trades, and statutory requirements to conserve and grow the existing open space corridor.
Yakima River Corridor - Prosser to Benton City	C2	Yakima River shoreline and floodplain between Prosser and Benton City	Private property with no public access except from the water		Yes			Yes	Trail right of way/easement acquisition along river or within existing highway or railroad rights of way. Desire for non-motorized trail along Yakima River referenced in Parks Plan (pg. 28)
Yakima River Corridor through Horn Rapids County Park	C3	Open space corridor extending from Benton City north along the Yakima River, connecting to large areas of public open space including the Rattlesnake Slope Wildlife Area and further to the Saddle Mountain National Wildlife Refuge. Between Benton City and Rattlesnake Slope Wildlife Area, land along the Yakima River is mostly in private ownership with fragmented riparian cover and habitat.	Higher intensity public use of Rattlesnake Mountain Shooting Facility and Horn Rapids County Park. Tapteal Trail provides non-motorized access along the entire corridor and connects open space to urban areas. Lower intensity use occurs in the connected open space areas to the northwest into the Rattlesnake Hills.	Yes	Yes	Yes	Yes	Yes	Significant publicly owned lands and trail access already exist. WDFW could pursue future opportunities to protect/grow important habitat cores adjacent to Rattlesnake Slope Wildlife Area through acquisition of adjacent lands. Shrubsteppe biodiversity potential indicates potential opportunities for shrubsteppe restoration across large acreages - additional analysis needed to prioritize target parcel list.
Lower Yakima River	C4	Riverine corridors with multiple protected habitats. Upper extent includes a large restored wetland complex adjacent to the Yakima River protected under the Wetlands reserve program. Downstream on the Yakima River delta, the Chamna Natural Preserve is a 276-acre park with more than 11 miles of trails winding through shrub-steppe, riparian, and wetland habitat.	Tapteal Trail provides non-motorized access along the entire corridor, connecting to residential neighborhoods and urban cores. Additional trail network exists throughout Chamna Natural Preserve.	Yes	Yes	Yes	Yes	Yes	Significant publicly owned lands and trail access already exist.
West Richland UGA	WR1	UGA property with shrubsteppe habitat That is part of the Candy Mountain Preserve. consisting of one undeveloped, 17.6-acre parcel (ID 119981012826004) owned by Benton County. Also adjoins the City of Richland water tank.	Publicly owned and adjoining preserve property with higher recreational use. Currently no formal trail development on the parcel.	Yes			Yes		Protect and enhance shrubsteppe habitat as applicable, keep the parcel open as part of the larger Red/Candy/Badger ridgetops open space corridor. Consider Open Space Conservation land use designation for this parcel and adjoining County owned properties.

Areas (UGA, Corridor)	Map #	Open Space Description	Public access demand & trail use	Linkage to larger open space areas	Critical areas (non PHS)	Habitat Core/ Corridor (PHS or WSSRI)	Shrubsteppe Habitat	Riparian Tree/Shub Canopy	Protection Status and Enhancement opportunities
Red, Badger, Candy Mountain Ridgetops	C5	Interconnected ridge tops of the Rattlesnake uplift formation forming an open space corridor between Richland and West Richland UGAs. The corridor includes Candy Mountain Preserve, Badger Mountain Centennial Preserve, and Little Badger Mountain Preserve. The open space properties and trail system form a popular open space network supporting hiking, biking, and horseback riding. Connectivity within the corridor is interrupted by private ownership, SR 224, and US 182.	Higher levels of trail density and use due to proximity to urban areas. Many areas have multimodal (non-motorized) trails, while others are hiker-only. Habitat areas are considered in trail planning and large areas of undisturbed habitat are left intact.	Yes		Yes	Yes		Non-motorized trail system could be extended northwest to connect to Red Mountain and beyond toward the Yakima River corridor. Pursue a variety of means and mechanisms such as area plans, conservation easements, clustered developments, land acquisitions and trades, and statutory requirements to conserve an interconnected network of open space on Red, Candy, and Badger mountains. Consider Open Space Conservation or Parks land use designation for publicly owned properties currently in other designations (see Appendix A).
Richland UGA	R1	UGA area within the Hanford Site with industrial use connecting to large habitat core and corridors to the north.	None			Yes	Yes		Property is in federal ownership and expected to have primarily industrial use. Encourage conservation of shrubsteppe habitat.
	R2	Single parcel plus US 182 right of way between Badger and Candy Mountain preserves.	None currently.	Yes			Yes		Possible linkage between residential neighborhoods in Richland to the Badger Mt. to Candy Mt. Connector Trail via highway ROW.
	R3	County owned parcels forming part of the Badger Mtn Centennial Preserve. Contains WSSRI Xeric/Sage Grouse habitat.	Extensive trail network within and connecting to the site	Yes		Yes	Yes		Maintain existing protections.
	R4	Mostly residential portion of Richland UGA with connection to Amon Creek corridor and trails and proximity to Little Badger Mountain Preserve. Two large parcels (PID 102882070000068 & 102881000003011) with steep slopes and shrubsteppe in NE corner of UGA.	None. Proximity to loop trails in Amon Creek corridor.	Yes			Yes		Pursue strategies to preserve open space properties with steep slopes and shrubsteppe as applicable
Amon Creek	C6	Open space corridor within the City of Richland between portions of Richland and Kennewick UGAs.	Existing loop trail within City of Richland.	Yes	Yes	Yes	Yes	Yes	Existing protections through much of the corridor. Coordinate with conservation district and other conservation groups to promote voluntary stewardship and riparian plantings along upper reaches in Badger Canyon.
Kennewick UGA	K1	Mostly residential and commercial portion of Kennewick UGA with connection to Amon Creek corridor.	None					Yes	None identified at this time
	K2	Parcel in Kennewick UGA currently in agricultural use near Elliot Lake, a spring-fed irrigation reservior	None					Yes	Rely on existing regulations and program to protect functions and values of Elliot Lake wetlands and buffers through VSP.
Elliott Lake	C7	Elliott Lake is spring fed lake located in a residential area with wetlands and forested buffers providing habitat.	None known		Yes			Yes	
Shrubsteppe Habitat along SR 397	C8	Corridor of steep slopes and shrubsteppe habitat extending Southeast from Kennewick toward the Wallula Gap Preserve, bisected by SR 397. Mapped PHS biodiversity corridor, WSSRI Sage Grouse and xeric habitats.	Connects to Hover Park at eastern extremity	Yes	Yes	Yes	Yes		

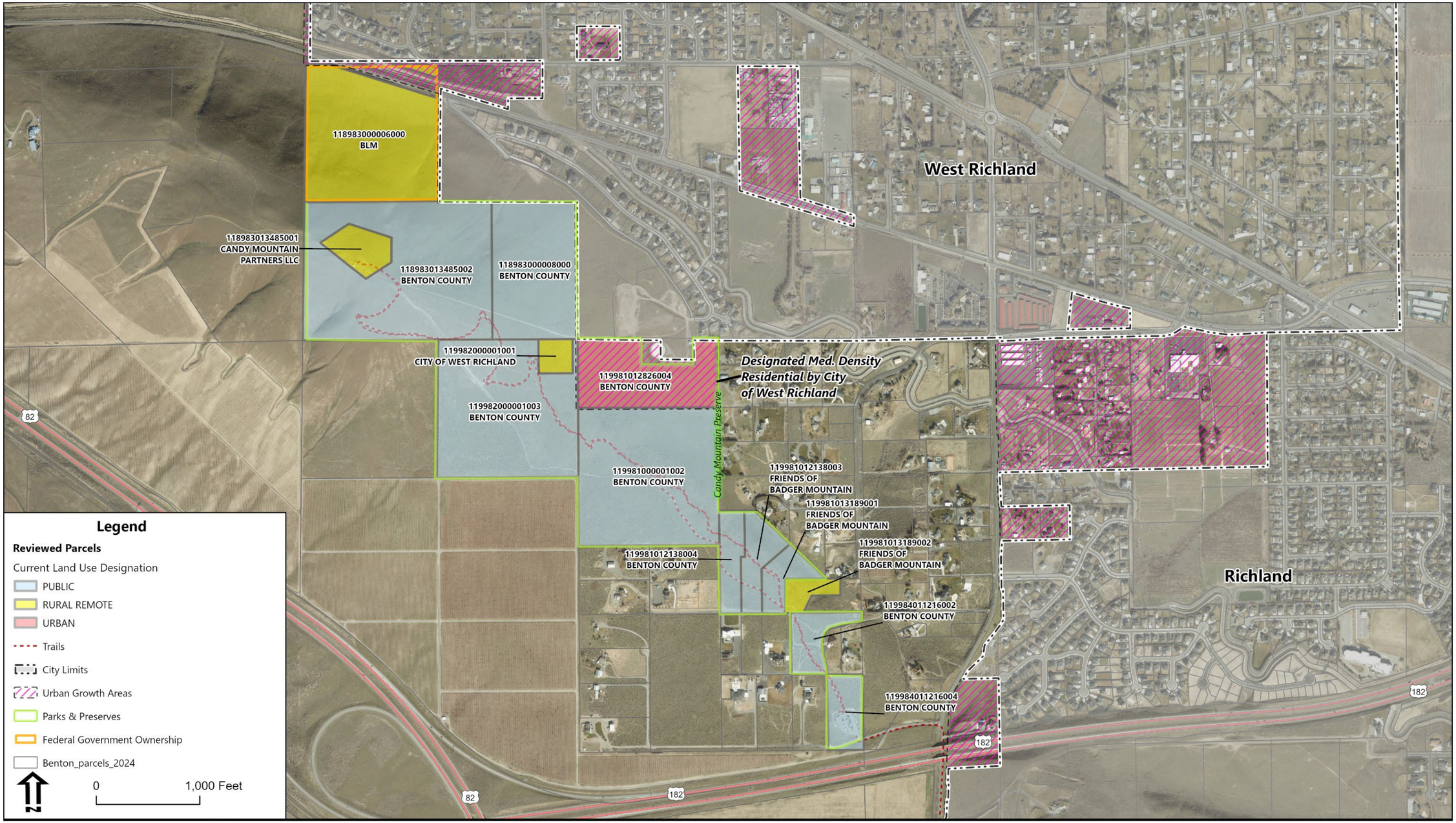
Appendix A

Parcels Reviewed for Open Space Designation

Table A-1: Parcels Reviewed for Open Space Conservation Designation

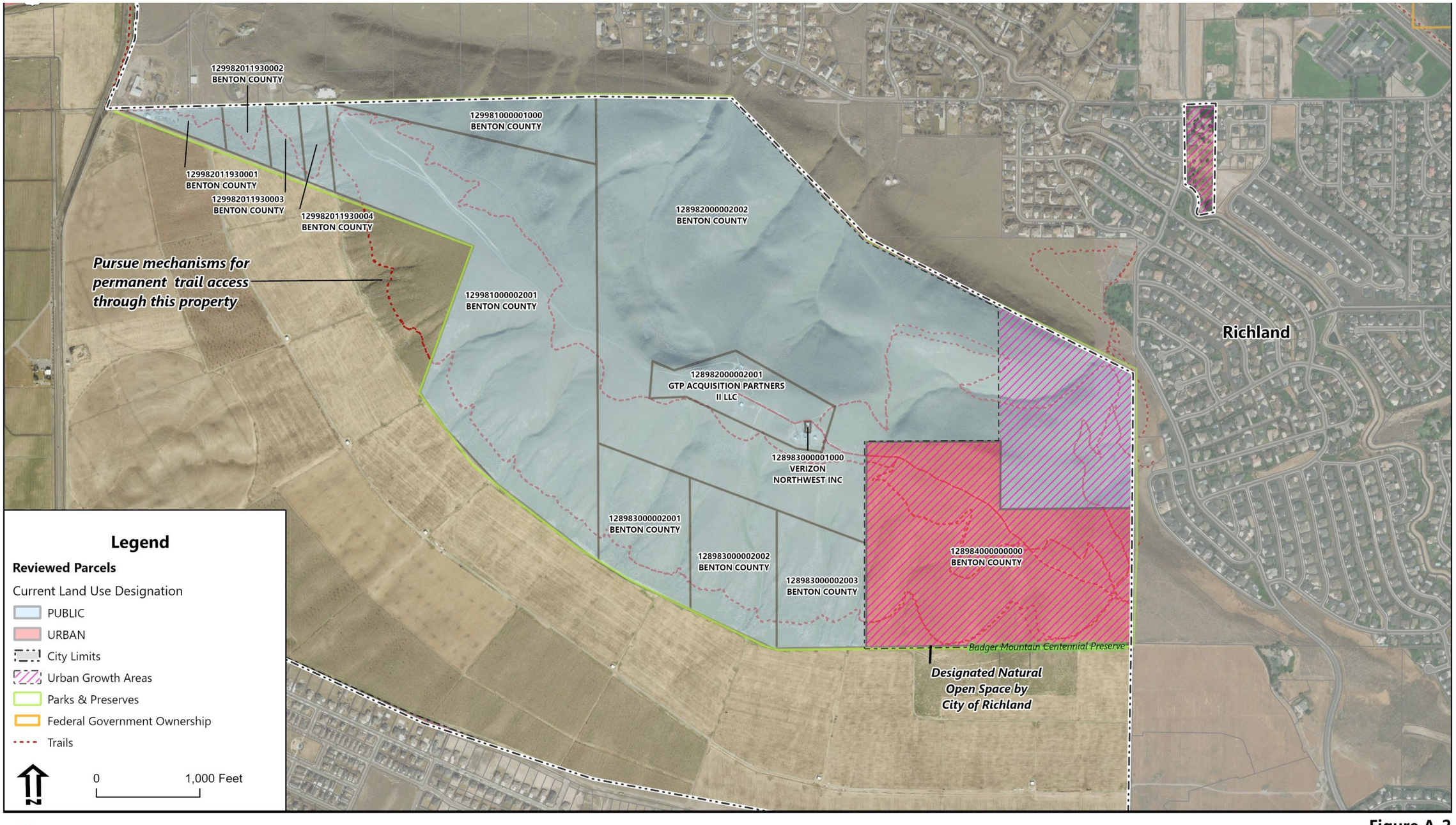
Area	Parcel ID	Acres	Owner	Land Use Designation	Zoning	Recommendations
Candy Mountain	118983000008000	25	Benton County	Public	Park District	Maintain existing designation
Candy Mountain	119981012138004	5.1	Benton County	Public	Park District	Maintain existing designation
Candy Mountain	119984011216002	5.39	Benton County	Public	Park District	Maintain existing designation
Candy Mountain	119984011216004	5.77	Benton County	Public	Park District	Maintain existing designation
Candy Mountain	119981012826004	17.61	Benton County	Urban/ Med. Density Residential (WR UGA)	Park District	Coordinate with West Richland to encourage applicable designations to protect open space use
Candy Mountain	119982000001003	36.58	Benton County	Public	Park District	Maintain existing designation
Candy Mountain	119981000001002	40	Benton County	Public	Park District	Maintain existing designation
Candy Mountain	118983013485002	50.96	Benton County	Public	Park District	Maintain existing designation
Candy Mountain	118983000006000	37.74	BLM	Rural Remote	RL-5	Coordinate with BLM to discuss designation as Public/Open Space Conservation Designation
Candy Mountain	119982000001001	2.5	City of West Richland	Rural Remote	RL-5	Coordinate with the City of West Richland to determine if Public designation is appropriate.
Candy Mountain	119981013189002	2.84	Friends of Badger Mtn.	Rural Remote	RL-5	Maintain existing designation
Candy Mountain	119981013189001	4.35	Friends of Badger Mtn.	Public	Park District	Maintain existing designation
Candy Mountain	119981012138003	5.69	Friends of Badger Mtn.	Public	Park District	Maintain existing designation
Candy Mountain	118983013485001	5.02	Private	Rural Remote	RL-5	Maintain existing designation
Badger Mtn	129982011930001	5	Benton County	Public	Park District	Maintain existing designation
Badger Mtn	129982011930002	5	Benton County	Public	Park District	Maintain existing designation
Badger Mtn	129982011930003	5	Benton County	Public	Park District	Maintain existing designation
Badger Mtn	129982011930004	5	Benton County	Public	Park District	Maintain existing designation
Badger Mtn	129981000001000	20	Benton County	Public	Park District	Maintain existing designation
Badger Mtn	128983000002003	23.03	Benton County	Public	Park District	Maintain existing designation
Badger Mtn	128983000002001	25	Benton County	Public	Park District	Maintain existing designation
Badger Mtn	128983000002002	25	Benton County	Public	Park District	Maintain existing designation
Badger Mtn	128984000000000	97.16	Benton County	Urban/ Natural Open Space (Richland UGA)	Park District	Maintain Existing. Property is designated Natural Open Space by City of Richland.
Badger Mtn	129981000002001	145.27	Benton County	Public	Park District	Maintain existing designation
Badger Mtn	128982000002002	291.59	Benton County	Public/Natural Open Space (Richland UGA portion)	Park District	Maintain existing designation. Portion of property is in Richland UGA. Coordinate with City of Richland
Badger Mtn	128982000002001	20	Private	Public	Park District	Maintain existing designation
Badger Mtn	128983000001000	0.11	Private - Verizon	Public	Park District	Maintain existing designation
Badger Canyon	110883000000000	160	BLM	Rural Remote	RL-5	Coordinate with BLM to determine if Public/Open Space Conservation Designation is appropriate
Badger Canyon	116882020002000	269.37	DNR	Rural Remote	RL-5	Designate as Open Space Conservation or Parks. Coordinate with DNR to transfer ownership interest via trust lands transfer process or other mechanisms as appropriate.
Horse Heaven Hills	126961000001000	3	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	123964000002000	15	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	124954000002000	37.59	BLM	Rural Resource	RL-20	coordinate with BLM and DNR
Horse Heaven Hills	124962000002000	40	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	124963000000000	40	BLM	GMA Ag	GMA Ag	Coordinate with BLM and DNR to apply appropriate open space protections.
Horse Heaven Hills	114963000002000	60	BLM	Rural Resource	RL-20	coordinate with BLM and DNR
Horse Heaven Hills	108871000001000	75.03	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	134973000002000	80	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	119963020061001	97.21	BLM	Rural Resource	RL-20	coordinate with BLM and DNR
Horse Heaven Hills	104871000001000	106.44	BLM	GMA Ag	GMA Ag	Coordinate with BLM and DNR to apply appropriate open space protections.

Area	Parcel ID	Acres	Owner	Land Use Designation	Zoning	Recommendations
Horse Heaven Hills	120961000002000	118.74	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	136952000000000	120	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	105871000001000	136.07	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	121964000001000	156.9	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	121961000000000	160	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	122963000000000	160	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	115962000001000	179	BLM	Rural Remote	RL-5	coordinate with BLM and DNR
Horse Heaven Hills	119964020068000	200	BLM	Rural Resource	RL-20	coordinate with BLM and DNR
Horse Heaven Hills	130961000001000	203.65	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	135973000000000	208	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	129972000005001	212	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	134973000001000	227.6	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	124962000001000	240	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	121962000001000	280	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	120963000001000	316.56	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	122961000000000	320	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	125961000000000	380	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	125951000001000	400	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	123961000003000	437.04	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	132971000000000	480	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	133971000003000	494.47	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	130972000000000	523.54	BLM	GMA Ag	GMA Ag	coordinate with BLM and DNR
Horse Heaven Hills	116964000001000	188.28	DNR	Rural Resource	RL-20	Coordinate with BLM and DNR to apply appropriate open space protections.
Horse Heaven Hills	126953000003000	318.77	DNR	Rural Resource	RL-20	coordinate with BLM and DNR



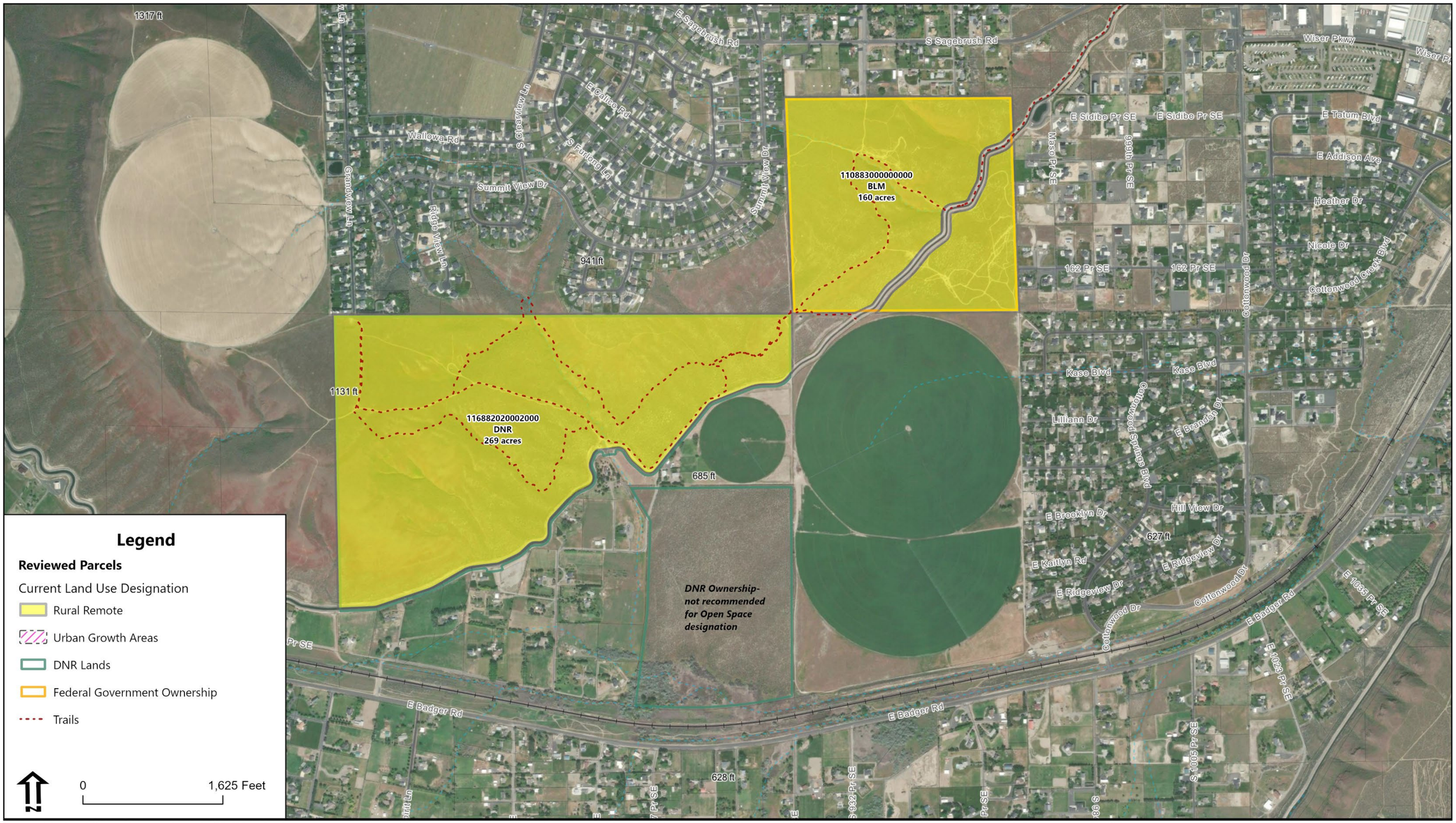
AC GEO

Figure A-1
Proposed Open Space Conservation Land Use Designation
Area 1: Candy Mountain Preserve



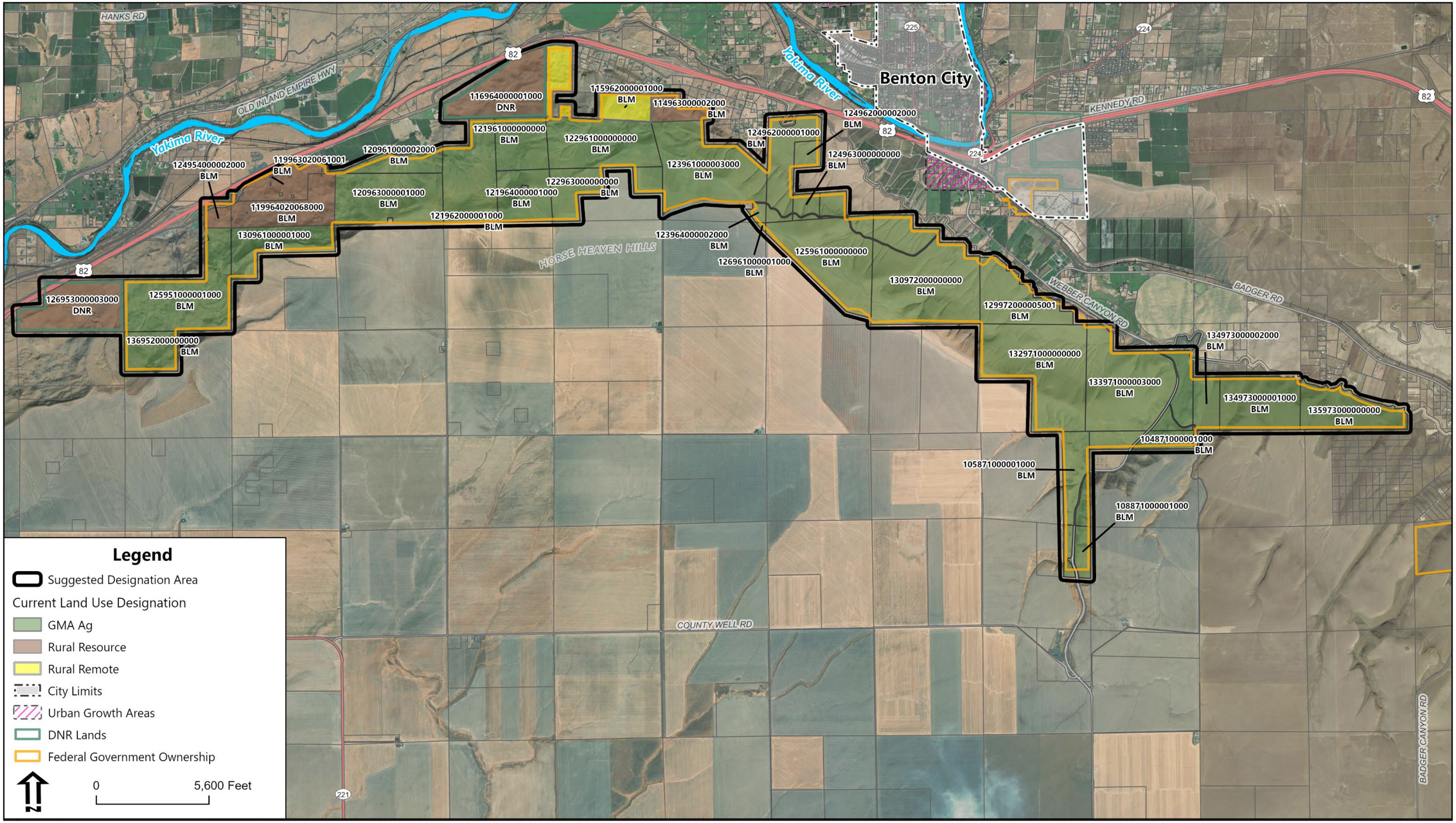
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Figure A-2
Proposed Open Space Conservation Land Use Designation
Area 2: Badger Mountain Centennial Preserve



AC GEO

Figure A-3
Proposed Open Space Conservation Land Use Designation
Area 3: Badger Canyon DNR Property



AC GEO

Figure A-4
Proposed Open Space Conservation Land Use Designation
Area 4: Horse Heaven Foothills

Appendix B

Open Space Corridors Analysis Maps

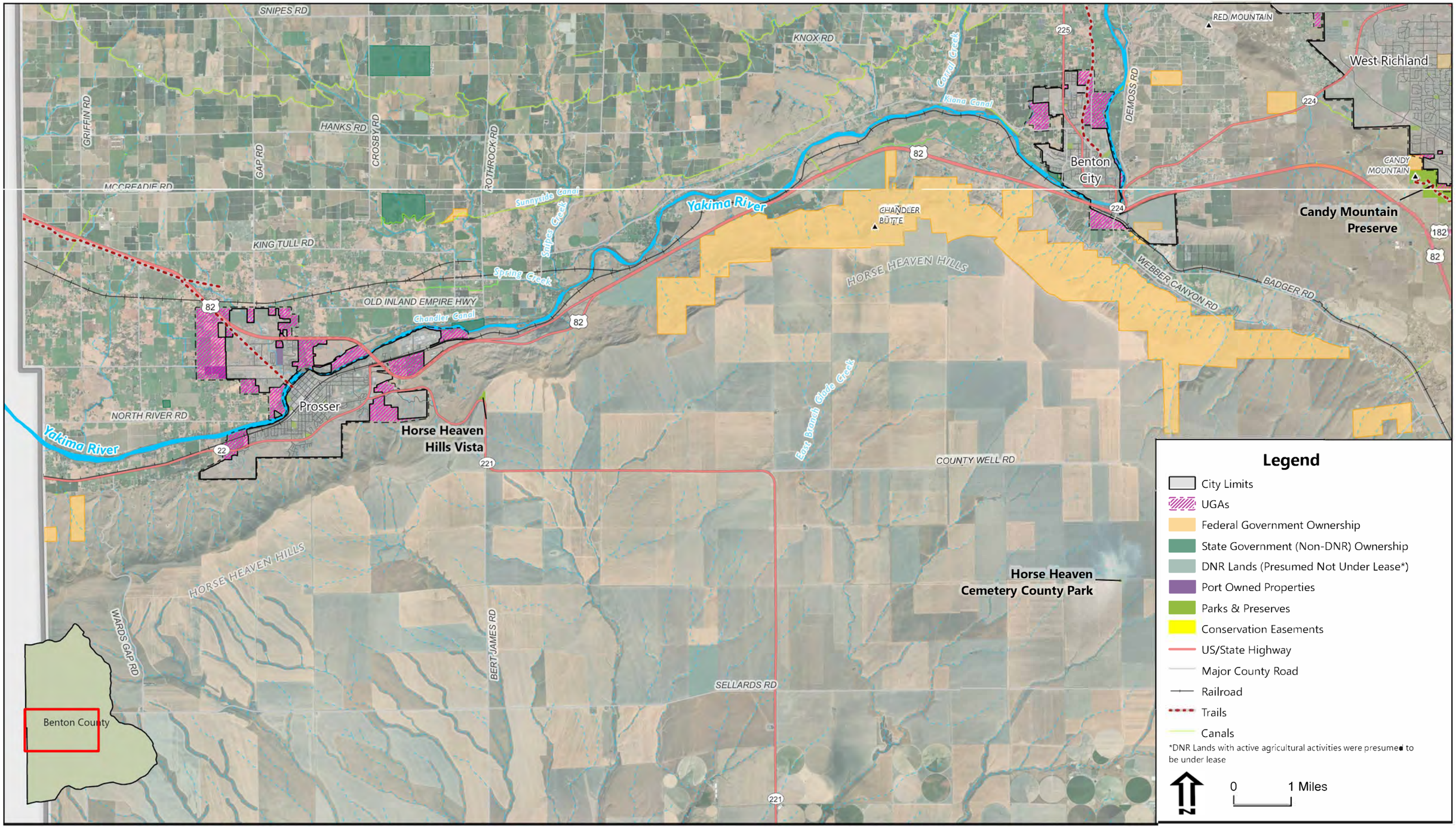


Figure B-1

Prosser - Benton City

Public Land, Parks, & Trails

AC GEO

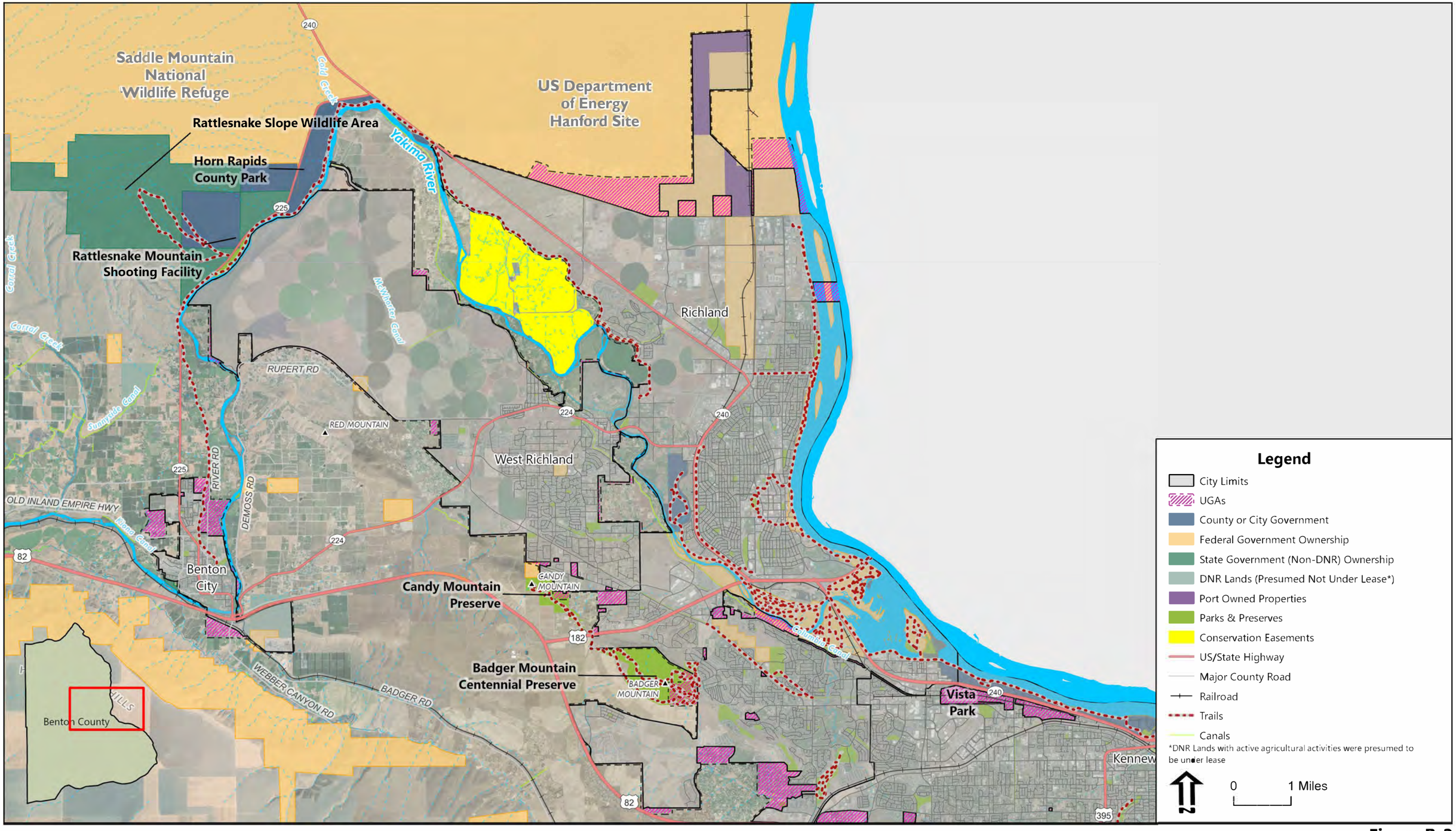


Figure B-2

Benton City - West Richland - Richland

Public Land, Parks, & Trails

AC GEO

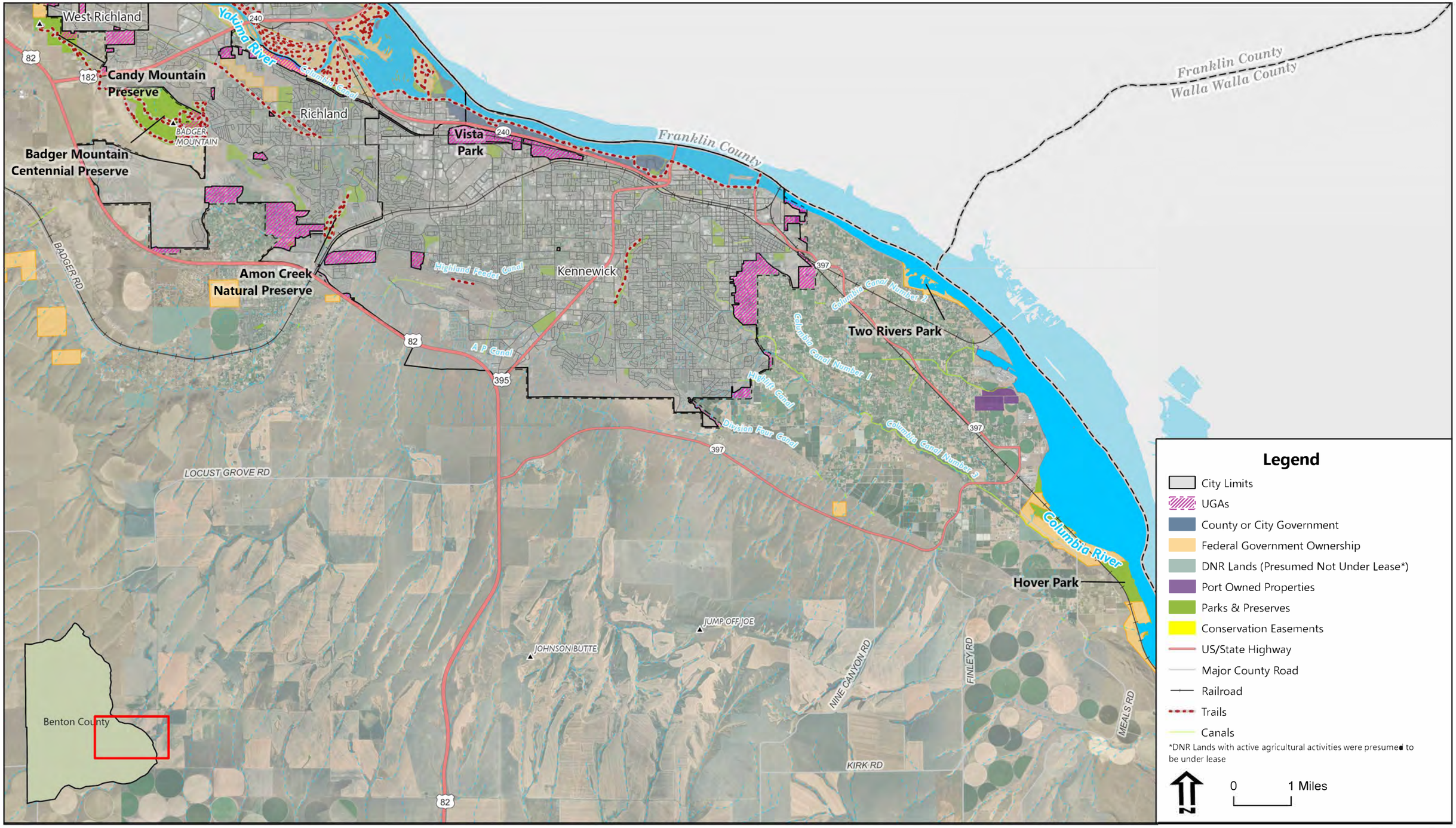


Figure B-3

Richland - Kennewick

Public Land, Parks & Trails

AC GEO

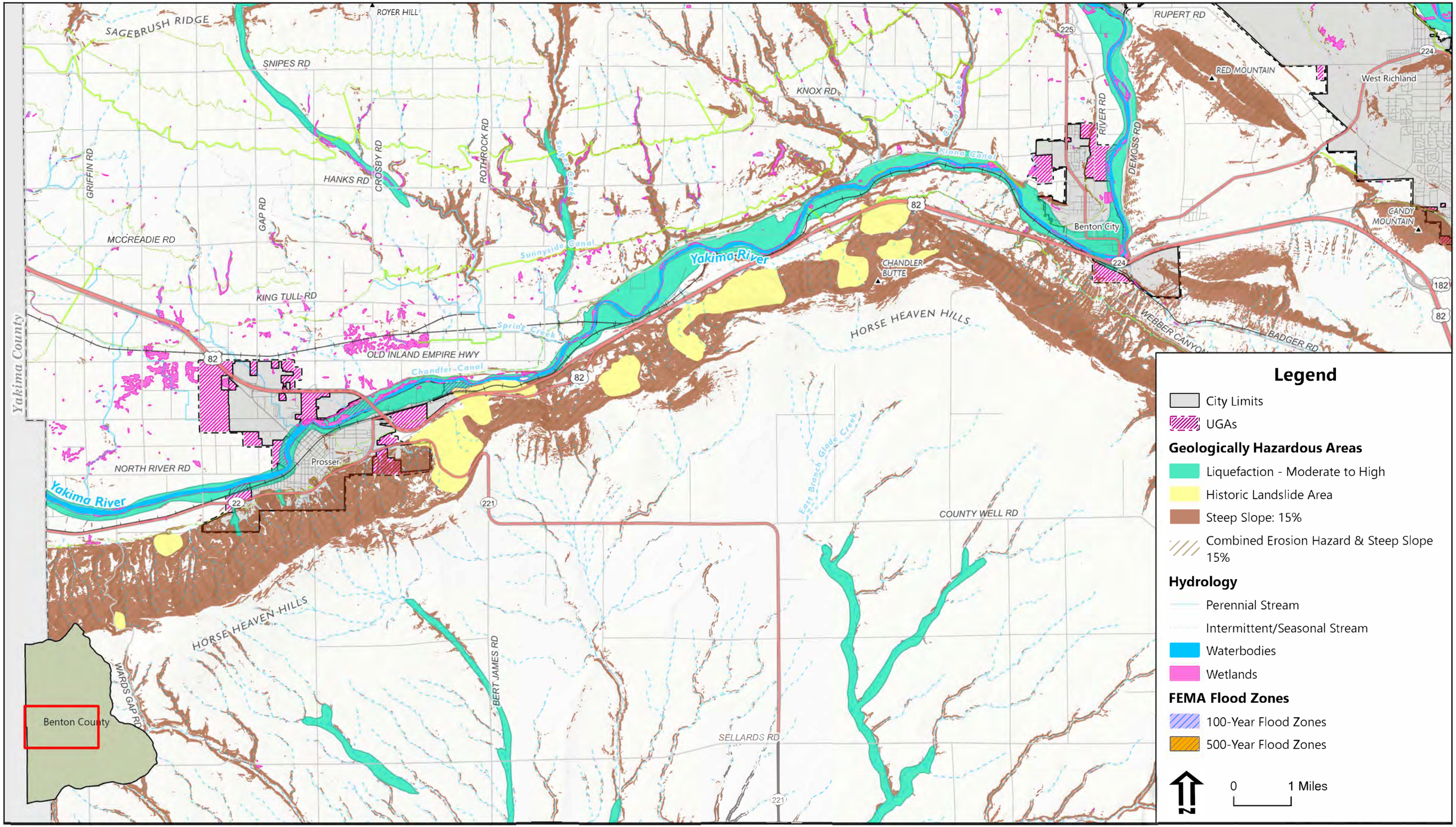


Figure B- 4

Prosser - Benton City

Wetlands, Floodplains, Geologically Hazardous Areas

AC GEO

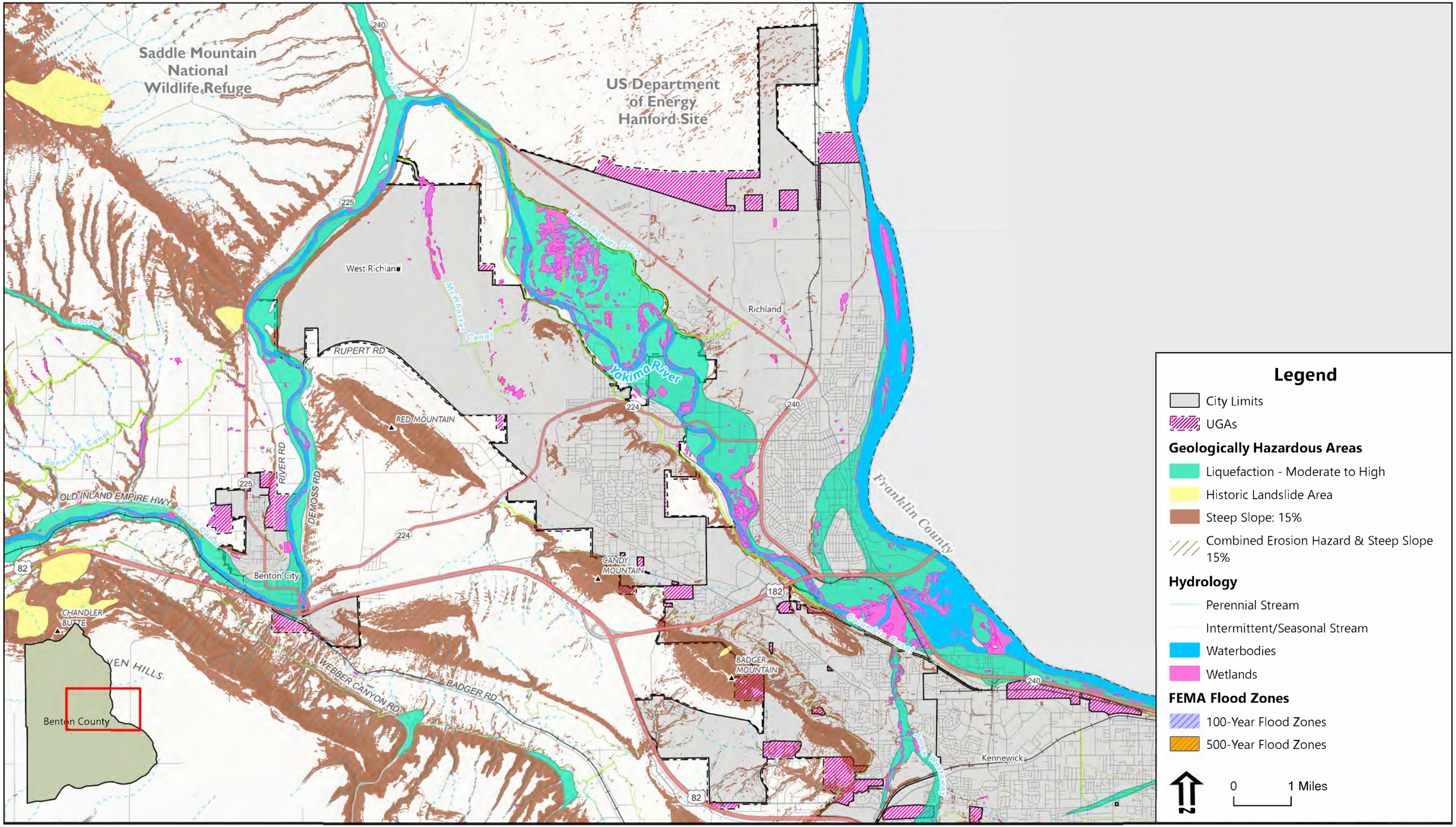


Figure B-5

Benton City - West Richland - Richland

Wetlands, Floodplains, Geologically Hazardous Areas

AC GEO

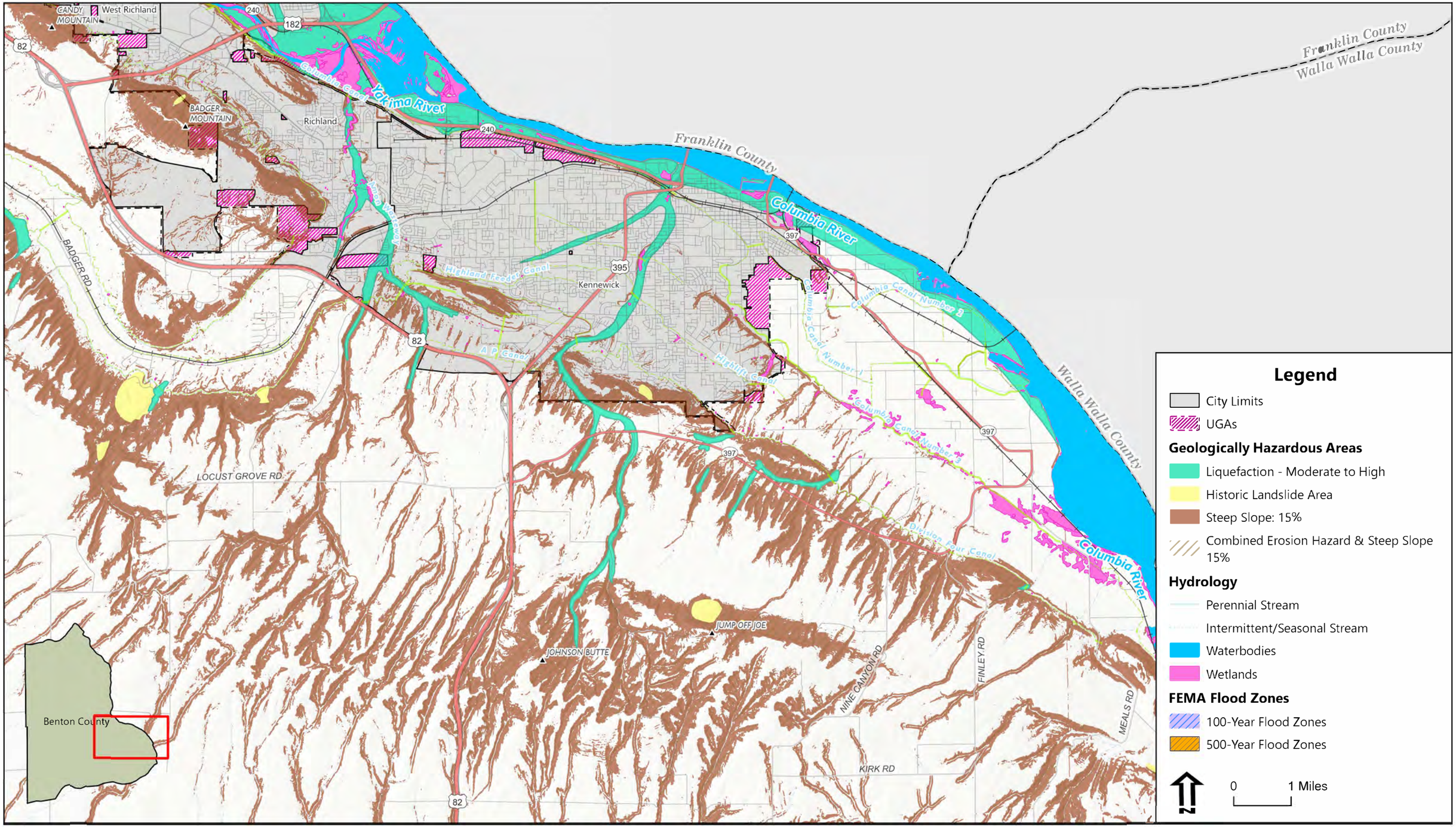


Figure B-6

Richland - Kennewick

Wetlands, Floodplains, Geologically Hazardous Areas

AC GEO

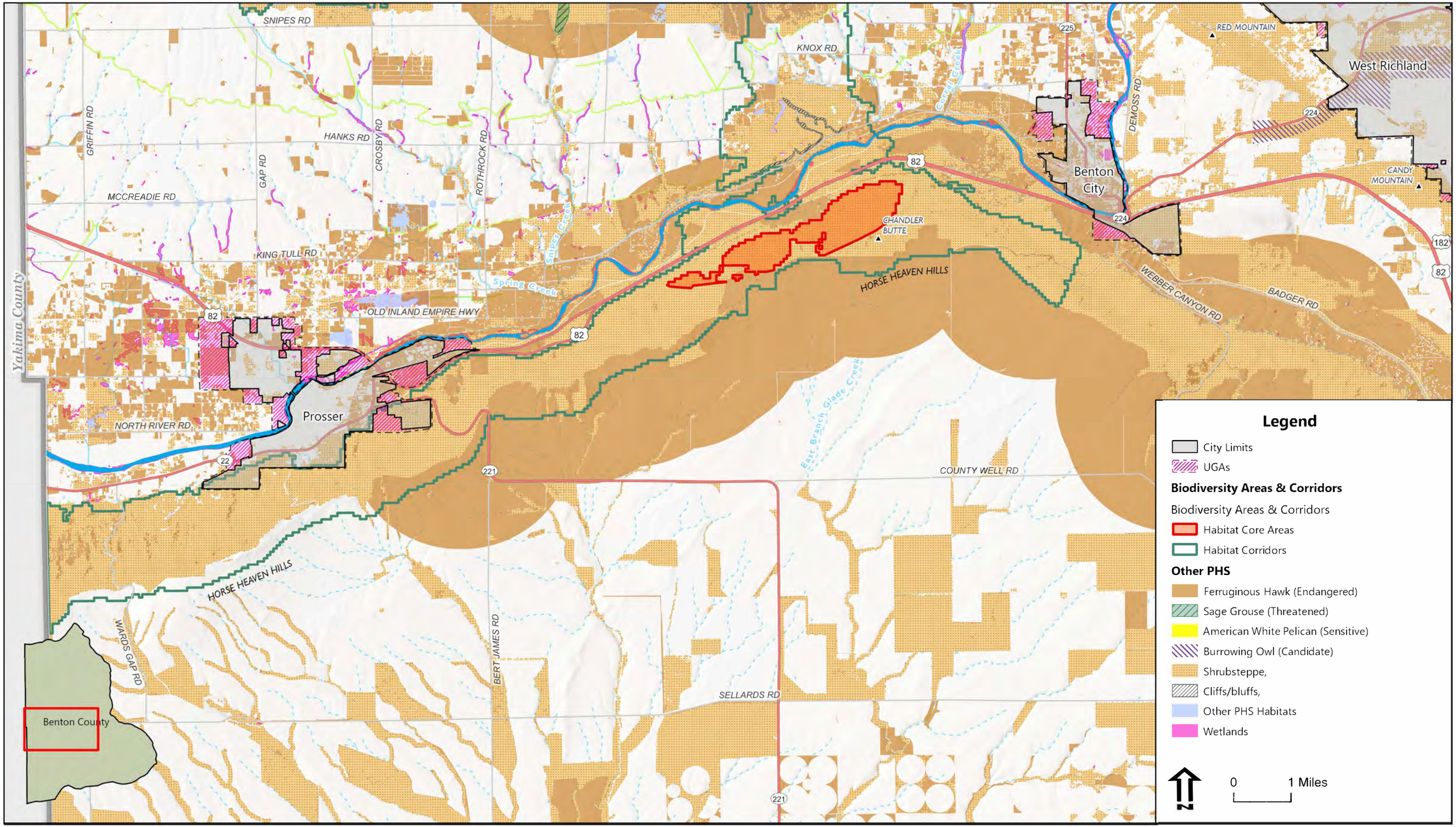


Figure B-7
Prosser - Benton City
WDFW PHS Habitats

AC GEO

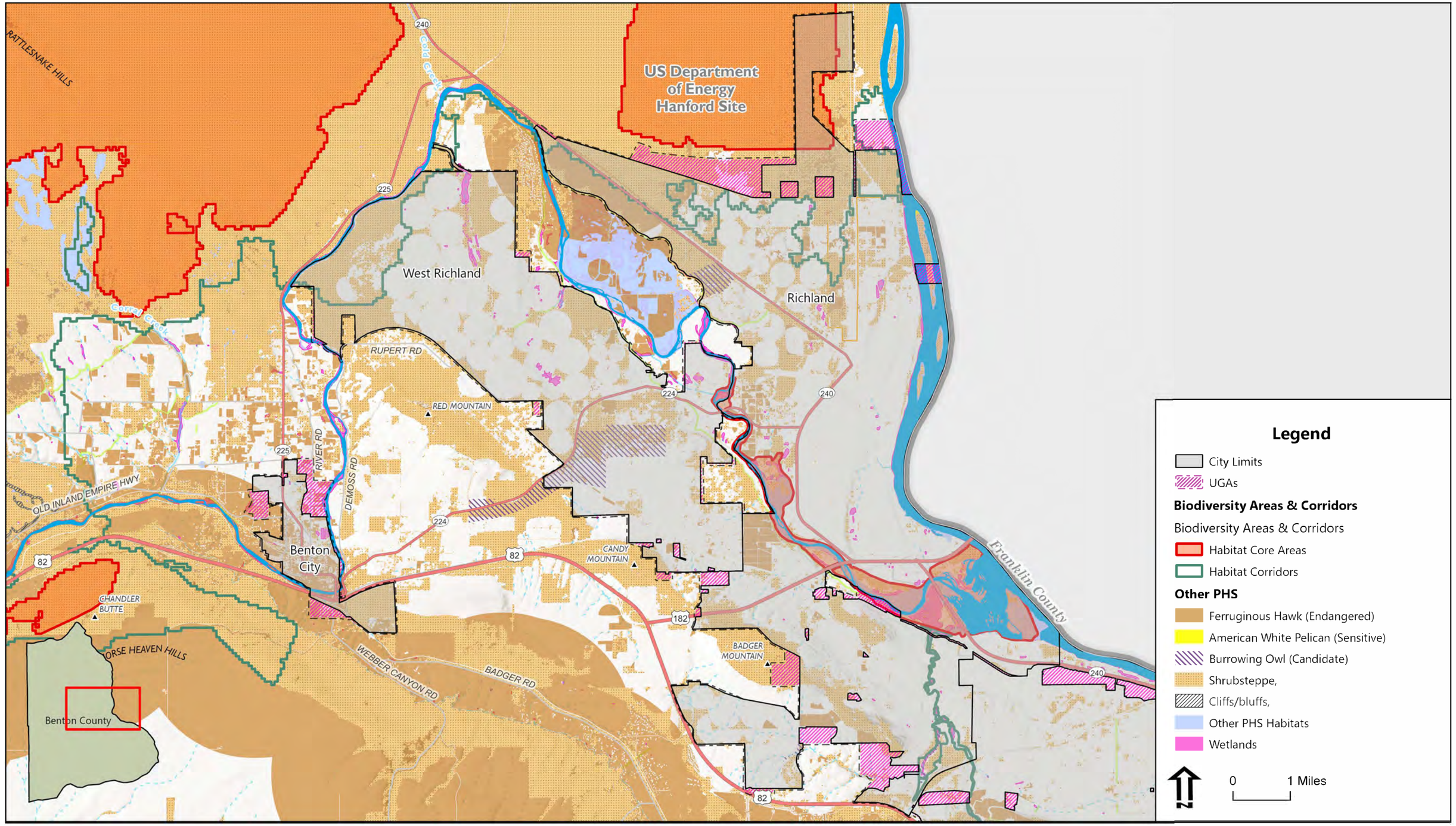


Figure B-8

Benton City - West Richland - Richland

WDFW PHS Habitats

AC GEO

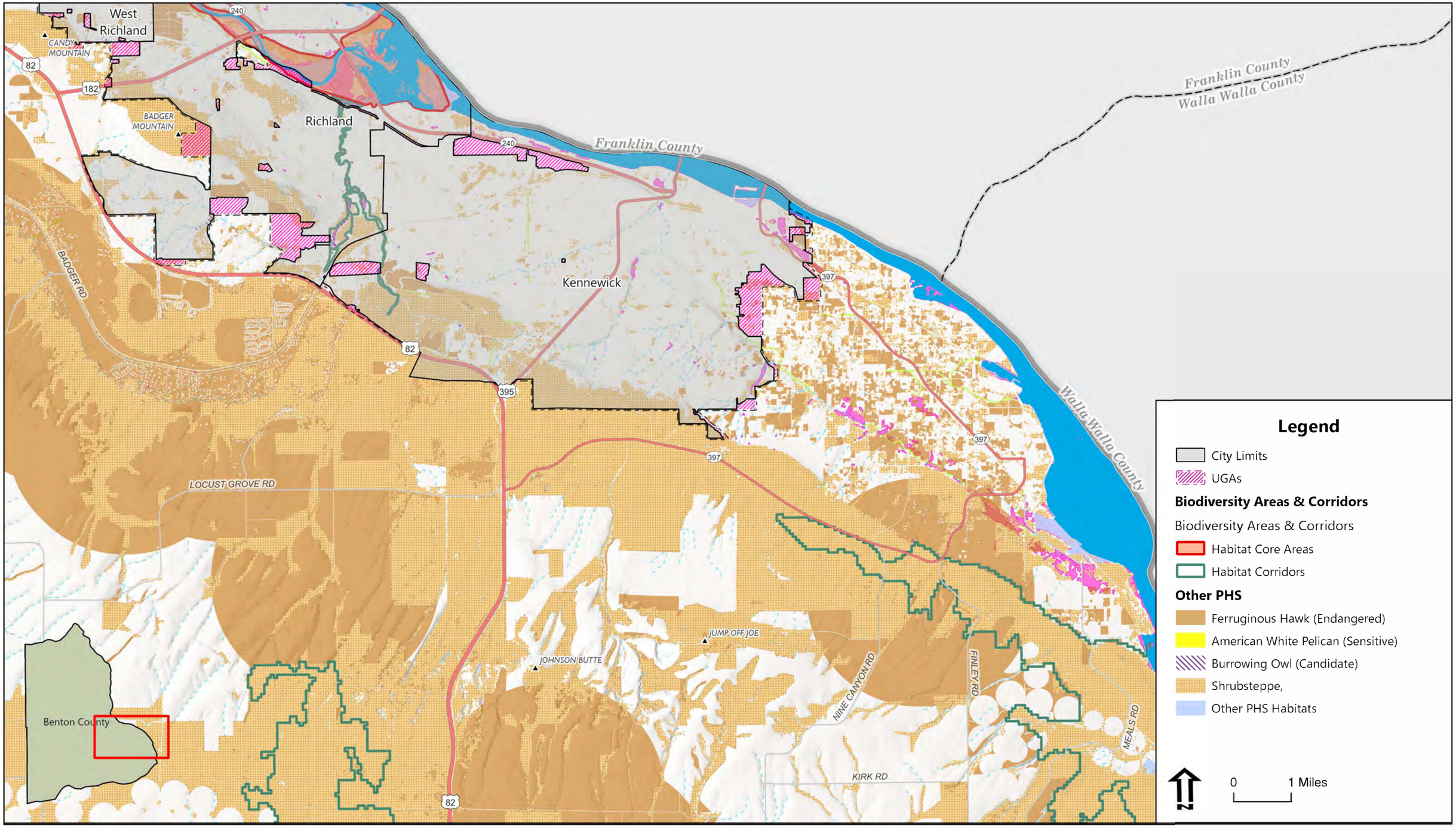


Figure B-9

Richland - Kennewick

WDFW PHS Habitats

AC GEO

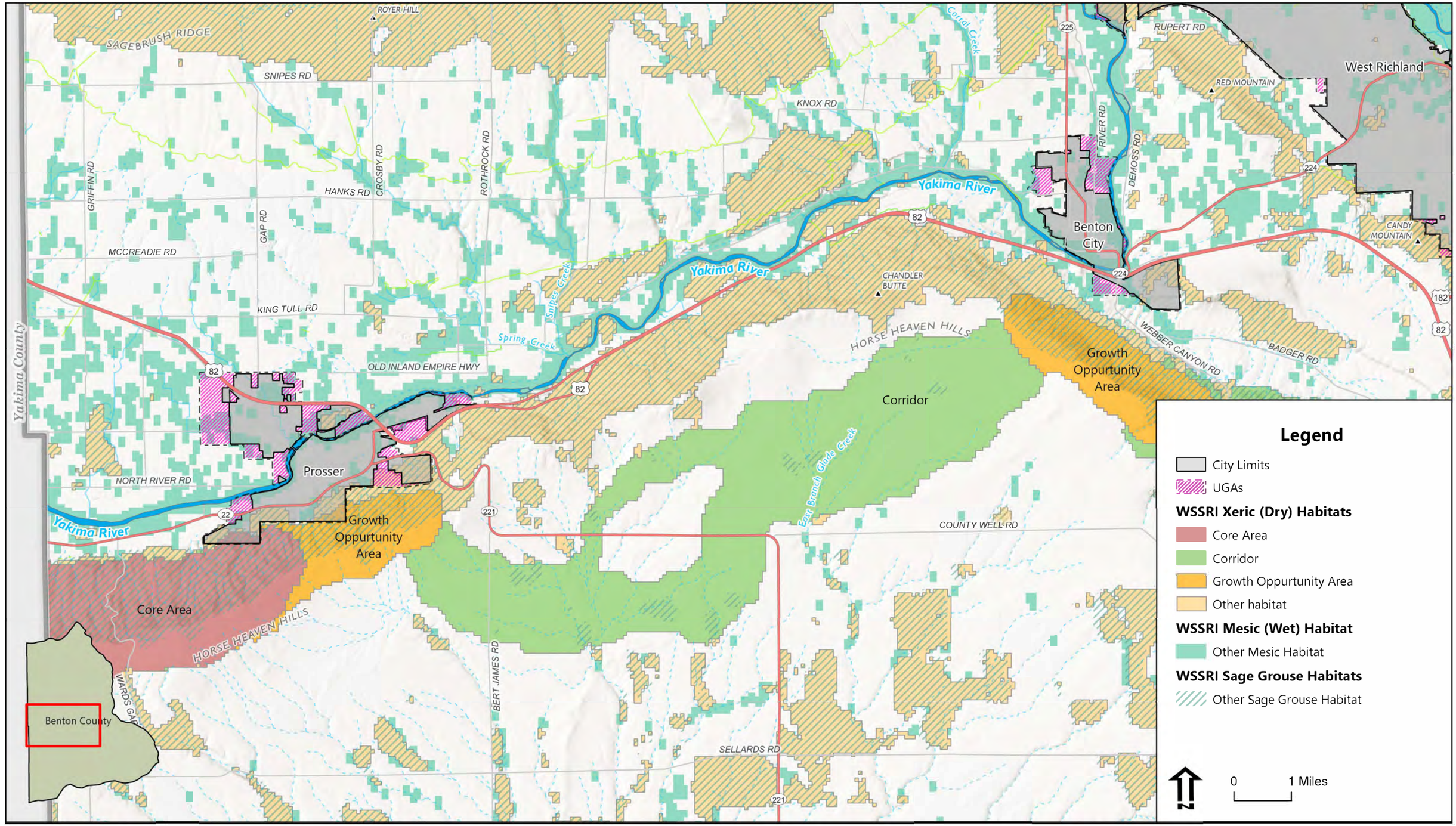


Figure B-10
Prosser - Benton City
Washington Shrubsteppe Restoration and Resiliency Initiative (WSSRI)

AC GEO

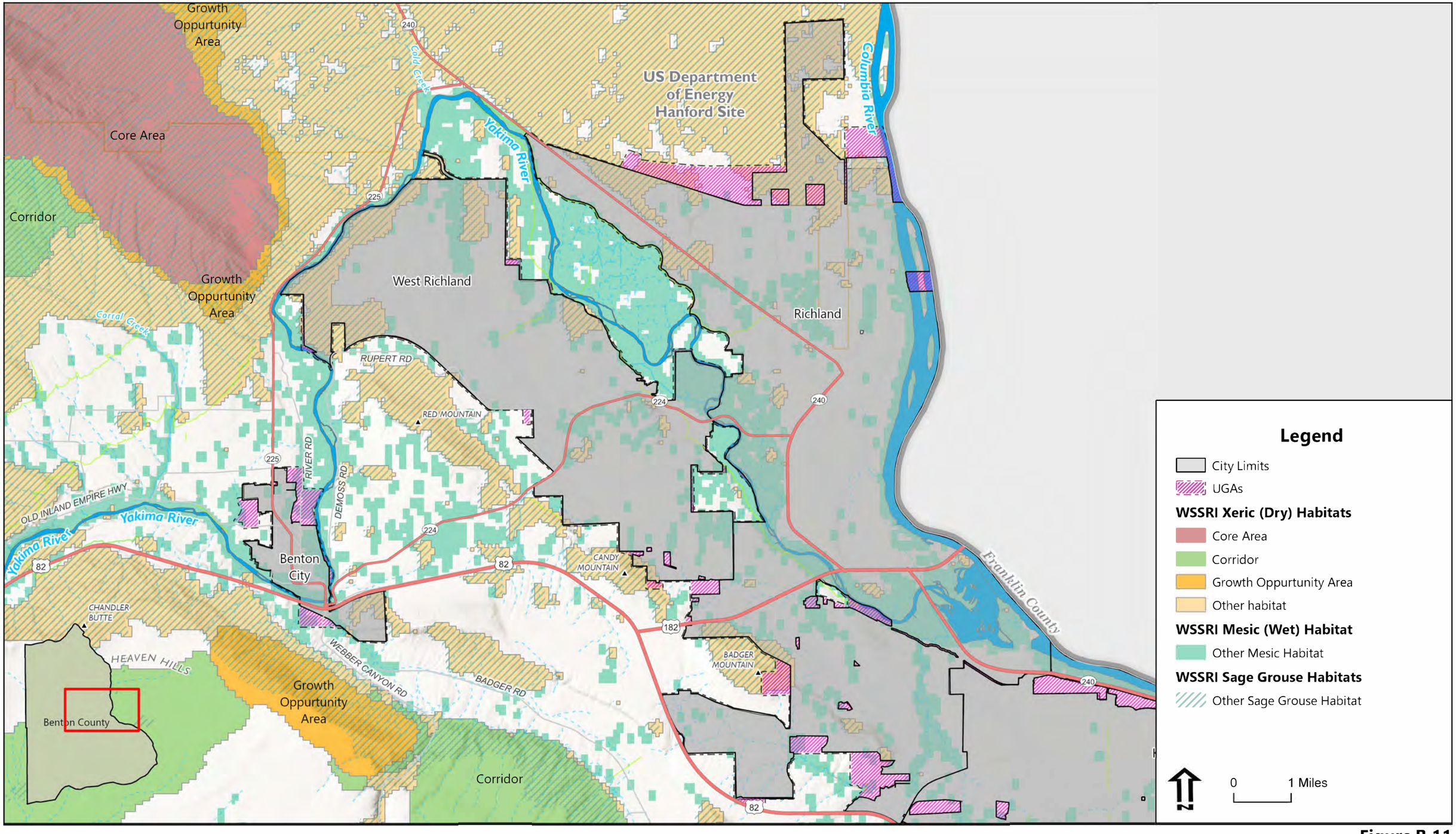


Figure B-11

Benton City - West Richland - Richland

Washington Shrubsteppe Restoration and Resiliency Initiative (WSSRI)

AC GEO

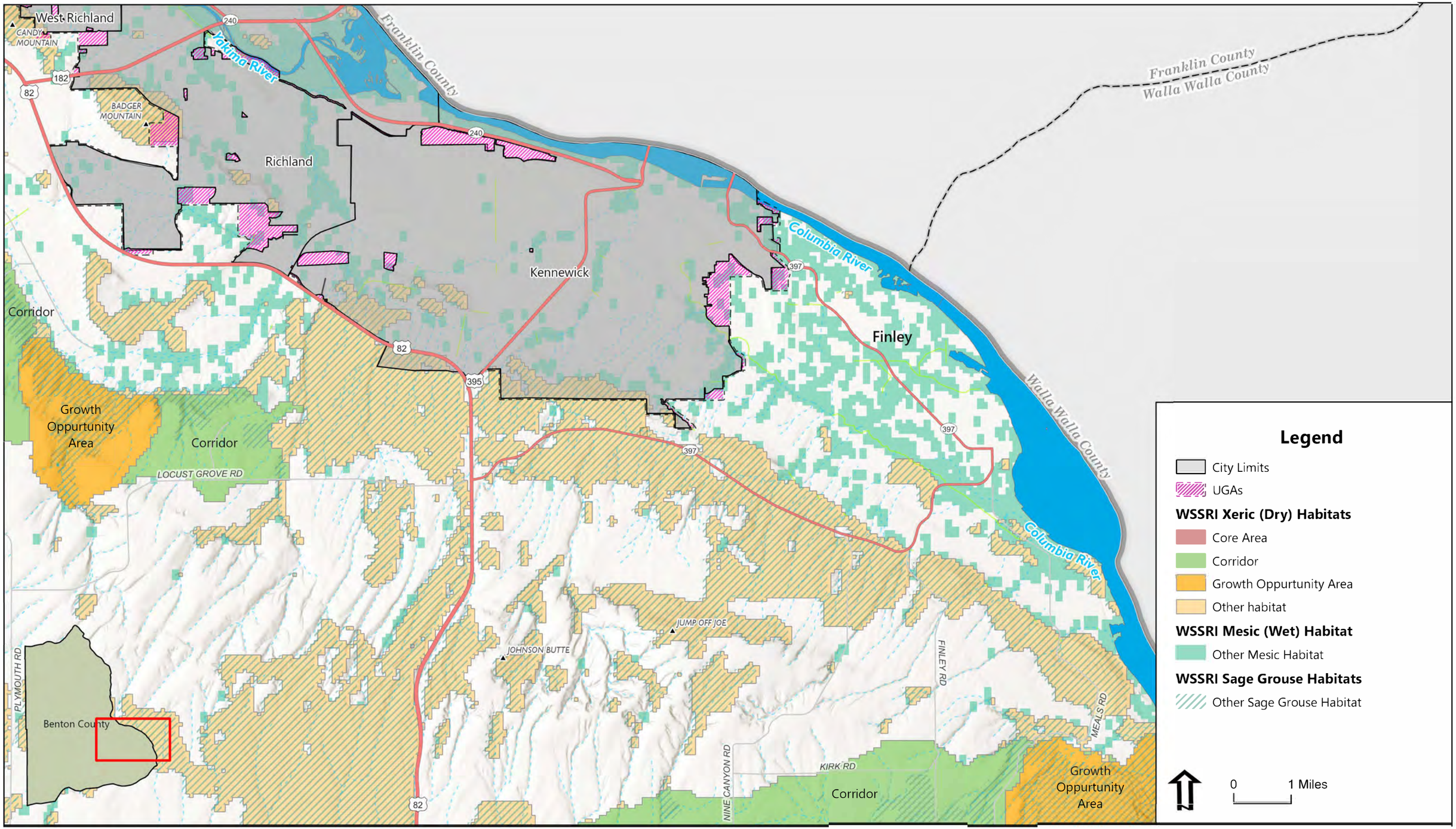


Figure B-12

Richland - Kennewick

Washington Shrubsteppe Restoration and Resiliency Initiative (WSSRI)

AC GEO

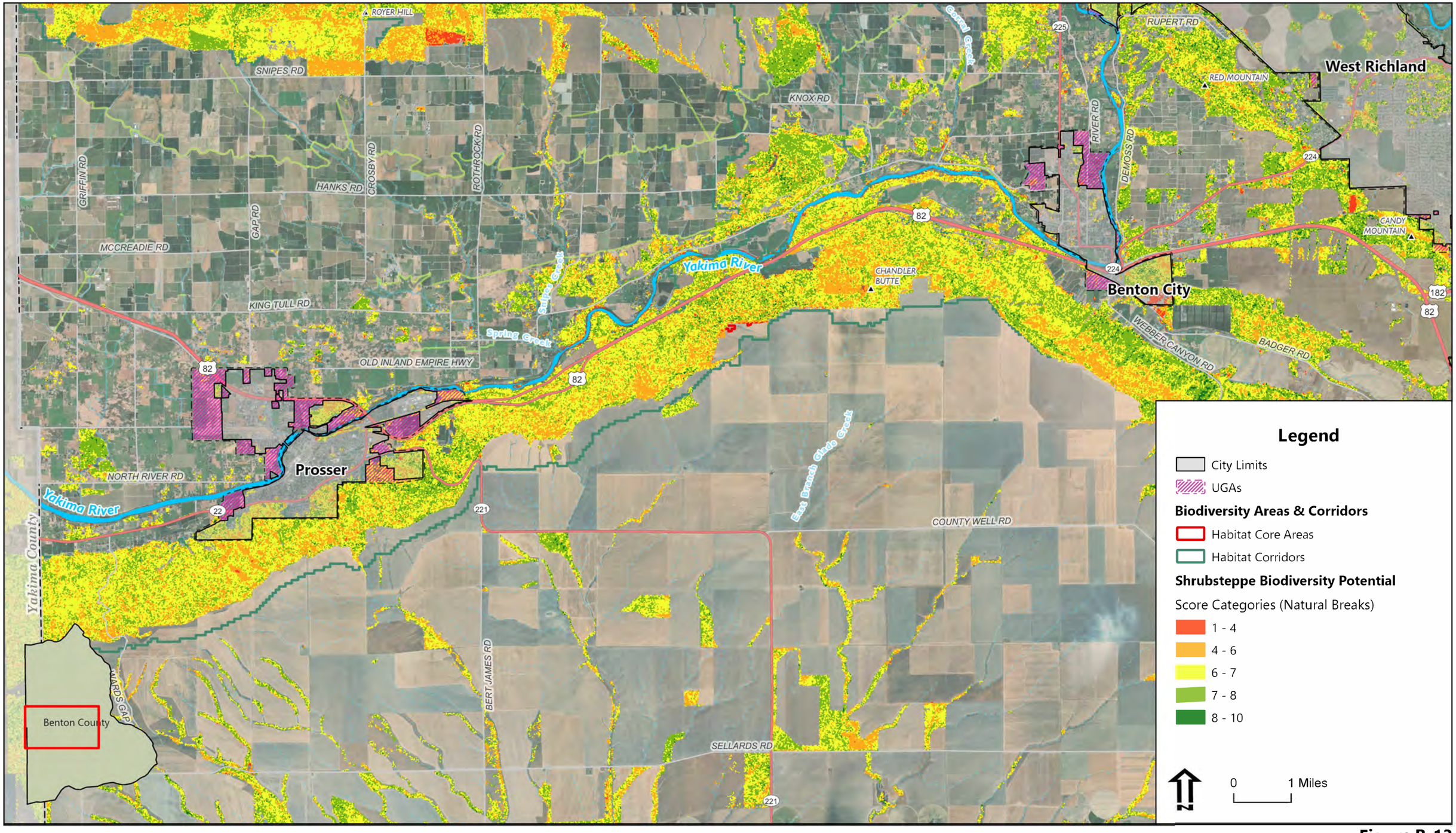


Figure B-13

Prosser - Benton City

Shrubsteppe Biodiversity Potential

AC GEO

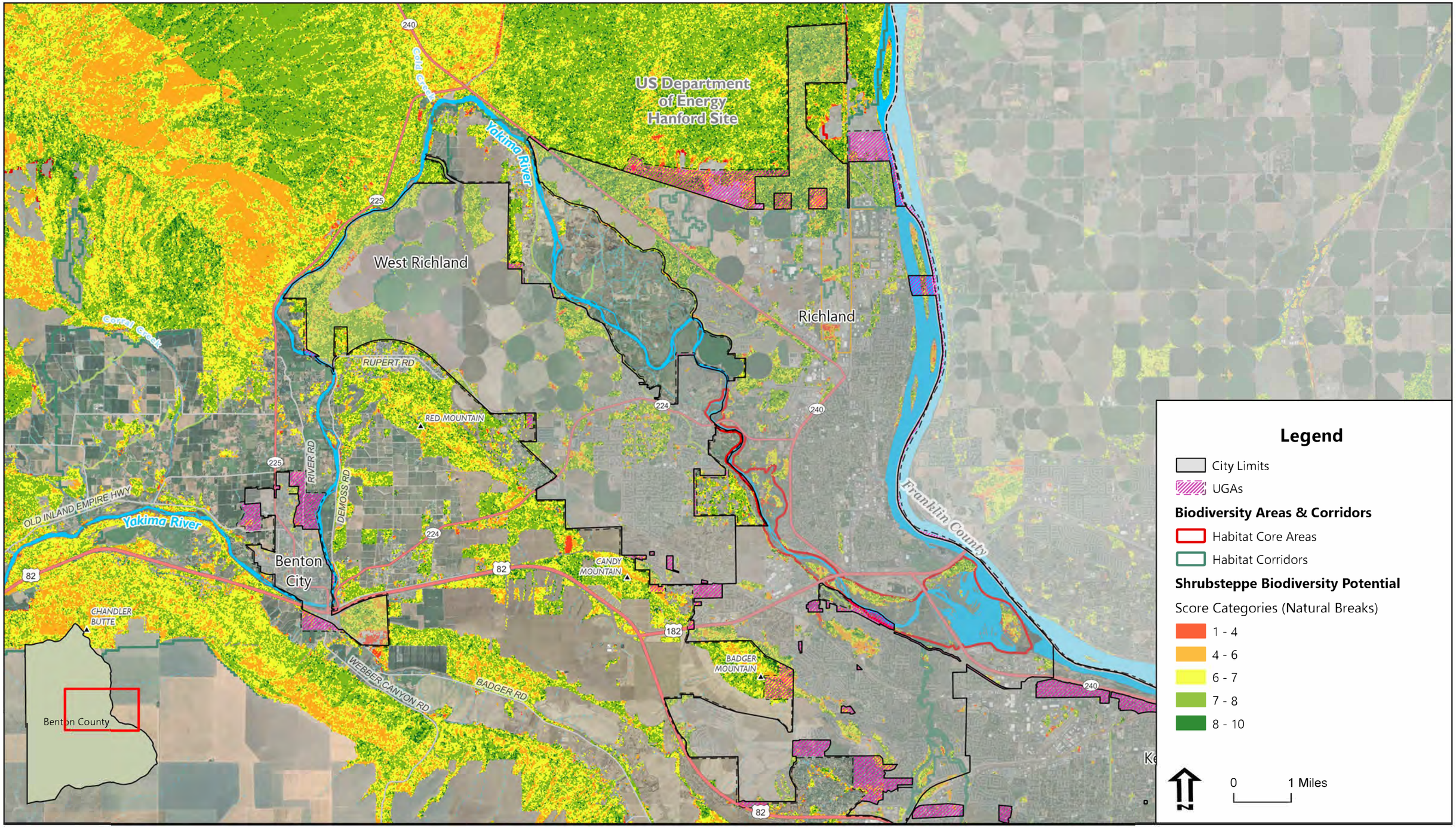


Figure B-14

Benton City - West Richland - Richland

Shrubsteppe Biodiversity Potential

AC GEO

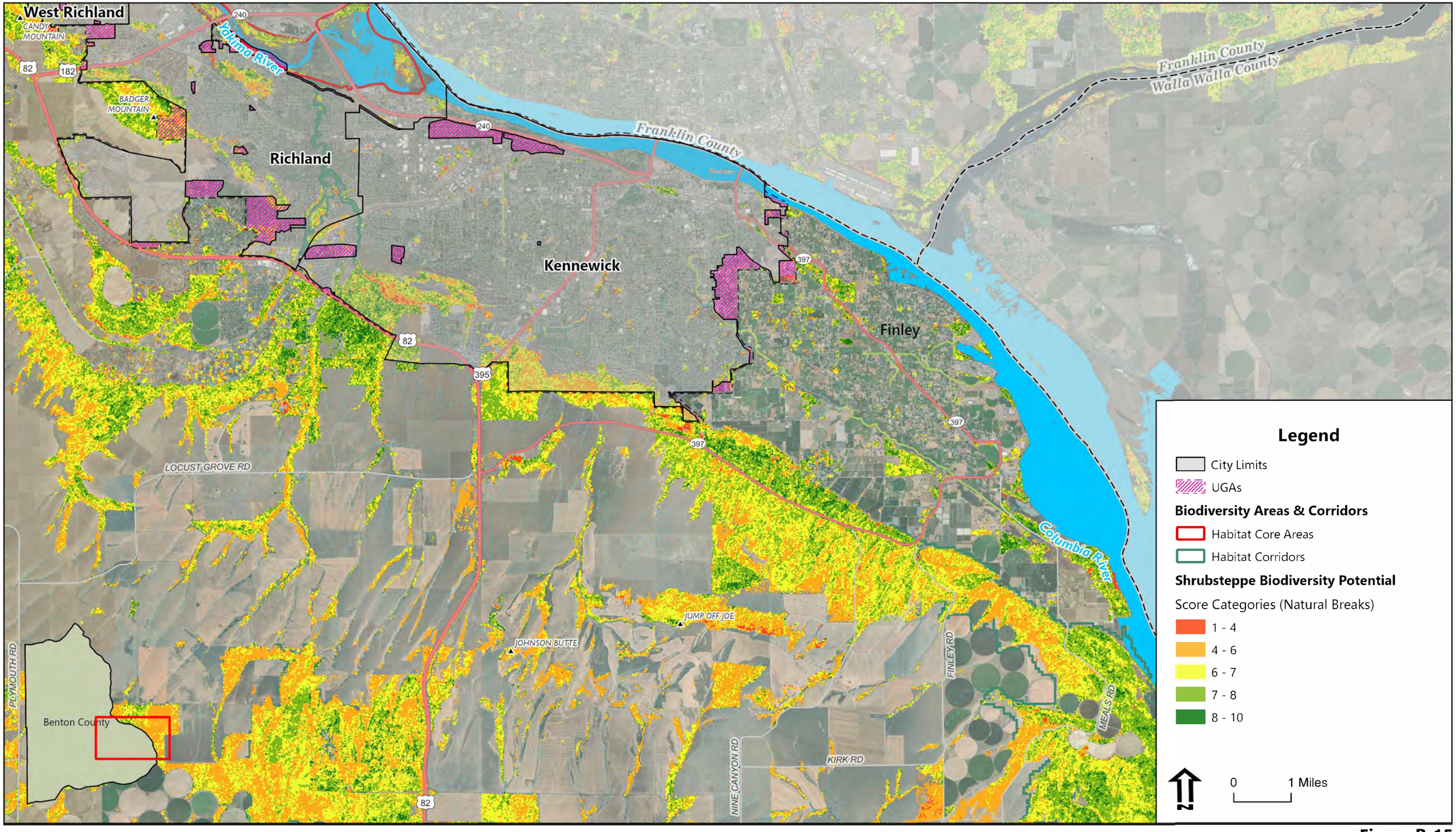


Figure B-15

Richland - Kennewick

Shrubsteppe Biodiversity Potential

AC GEO

Appendix N
Draft Shrubsteppe Mitigation Program Description



Shrubsteppe habitat in Benton County, 2025

FINAL DRAFT Benton County Shrubsteppe Mitigation Program Description

September 24, 2026 Version

Program Purpose and Need

The Growth Management Act (the GMA) establishes no net loss (NNL) of ecological functions and values as a fundamental requirement for local land use planning. WAC 365-190-080(1) states:

> "Counties and cities required or opting to plan under the [GMA] must consider the definitions and guidelines in this chapter when designating critical areas and when preparing development regulations that protect all functions and values of critical areas to ensure **no net loss of ecological functions and values**."

The County and cities in Benton County, consistent with the GMA, are required to mitigate impacts from removal or degradation of shrubsteppe habitat when developed. Per the Washington Department of Fish and Wildlife (WDFW), shrusteppe is[1]:

> *"a nonforested vegetation type consisting of one or more layers of perennial bunchgrasses and a conspicuous but discontinuous layer of shrubs. Although Big Sagebrush is the most widespread shrubsteppe shrub, other dominant (or co-dominant) shrubs include Antelope Bitterbrush, Threetip Sagebrush, Scabland Sagebrush, and Dwarf Sagebrush. Dominant bunchgrasses include (but are not limited to) Idaho Fescue, Bluebunch Wheatgrass, Sandberg Bluegrass, Thurber's Needlegrass, and Needle-and-Thread. Sites can also have a layer of algae, mosses, or lichens. In areas with greater precipitation or on soils with higher moisture-holding capacity, shrubsteppe can also support a dense layer of forbs (i.e., broadleaf herbaceous flora). Shrubsteppe contains various habitat features, including diverse topography, riparian areas, and canyons. Another important component is habitat quality (i.e., degree to which a tract resembles a site potential natural community), which may be influenced by soil condition and erosion; and the distribution, coverage, and vigor of native shrubs, forbs, and grasses. At more disturbed sites, non-natives such as Cheatgrass or Crested Wheatgrass may be co-dominant species. Fire disturbance is an ecological component of shrubsteppe. Shrubsteppe disturbed by fire may lack the aforementioned habitat components during periods of post-fire recovery."*

If mitigation of shrubsteppe impacts cannot be accomplished onsite then offsite, compensatory mitigation is required. Additionally, the US Department of Energy and Pacific Northwest National Laboratory (PNNL) may also have mitigation needs for development in north Richland and the adjoining southern portion of the Hanford Nuclear Reservation.

In recent years, several different approaches for addressing shrubsteppe mitigation requirements offsite have been utilized in Benton County, including payments for the acquisition of mitigation lands to WDFW, developers seeking out and purchasing their own mitigation properties, and more recently, the cities of Kennewick and Richland, and PNNL contracting with the Benton

[1] WDFW Priority Habitats and Species List;
https://wdfw.wa.gov/sites/default/files/publications/00165/wdfw00165.pdf

Conservation District (Benton CD) to secure mitigation lands either through conservation easement or land acquisition. Mitigation required under these efforts has varied.

In light of this recent history, Benton County recognized the need for regional consistency for shrubsteppe mitigation and assigned White Bluffs Consulting and AC Geo, the consultant team leads for the County's 2026 Comprehensive Plan and development regulations update, to complete the following activities as part of this process:

- Forecast mitigation needs within the County, organized by each city, its respective UGA and the unincorporated area of the County
- Evaluate shrubsteppe habitat quantity and quality in Benton County
- Identify landowners of potential mitigation properties for conservation
- Investigate organizations (e.g. land trust) might be interested in partnering with the County and perpetually holding mitigation lands
- Identify options for a more regional and consistent mitigation solution to support expected development in the County for at least the next 20 years.
- Develop a draft and final program that describes a consistent regional approach for identifying and applying mitigation requirements, tailored to conditions in Benton County based on best available science
- Support coordination with the cities, WDFW, Benton CD and others during program development, to ensure the program has been thoroughly vetted with these partners and supported.

Demand Projections for Mitigation Land for Next 20 Years

Each city, the County, and PNNL have identified areas with associated acreages that they expect to be developed over the next 20 years (through 2046). These areas were intersected with shrubsteppe data sets to identify gross acres that may require mitigation for this time period, as summarized in Table 1.

Table 1 – Twenty-Year Shrubsteppe Acreage Impact Estimate by Jurisdiction

Jurisdictions	City	UGA	Total	Percent of Total
Benton City	7	3	10	0.16%
Prosser	103	6	109	1.77%
West Richland	134.0	0.4	134.4	2.16%
Richland	954	47	1,001	16.08%
Kennewick	1,076	6	1,082	17.38%
Benton County	—	—	3,889	62.47%
Grand Total	**2,274.0**	**62.4**	**6,225**	**100%**

The acreages in Table 1 provide a high end estimate of shrubsteppe impacts, since some impacts are expected to be avoided on-site and shrubsteppe extent may be overestimated in the PHS dataset. Using the estimated acres of shrubsteppe impact in each jurisdiction, further projections were made based on the quality and spatial priority of shrubsteppe in areas that are expected to be developed, as informed by Benton CD model of habitat quality, as described above. Estimates are expected to be reviewed and updated by the County and cities approximately every 5 years.

Developing the Technical Basis for the Mitigation Program

The mitigation program is built on a dual framework that evaluates both the **habitat quality** (ecological functions) and the **spatial priority** (conservation values) of shrubsteppe habitat in Benton County. This framework relies on several key datasets to evaluate both potential impacts to shrubsteppe and potential mitigation properties. The key datasets include:

- Shrubsteppe quality model developed by the Benton Conservation District
- WDFW PHS Shrubsteppe Habitats and Biodiversity Areas and Corridors
- WSRRI Xeric Habitat Spatial Priority Data
- Shrubsteppe prioritization model developed by the Benton Conservation District

Shrubsteppe Biodiversity Potential Model to Evaluate Shrubsteppe Quality

Staff from the Benton CD developed the Shrubsteppe Biodiversity Potential (SSBP) model to provide a landscape-scale indication of shrubsteppe habitat quality, ecological function, and resilience. The model integrates LANDFIRE fuel models; Multi-Resolution Land Characteristics (MRLC) Rangeland Condition, Monitoring, Assessment and Projection) (RCMAP) fractional-cover data for annual and perennial herbaceous vegetation, sagebrush, other shrubs, trees, bare ground, and litter; and the Washington Department of Natural Resources Ecological Integrity Assessment framework for upland ecosystems. It also incorporates WDFW species-specific occurrences, PHS shrubsteppe and eastside steppe habitat, Columbia Plateau Biodiversity Areas and Corridors, WSRRI Xeric and Mesic landscape priorities, Arid Lands Initiative cores and linkages, conservation and public-access priorities, agricultural land-use and field-boundary data, possible CRP and fallow lands, parcels, and urban growth boundaries. Model development also incorporated Benton Conservation District staff knowledge of known high-quality shrubsteppe and field-based ground-truthing of mapped conditions.

The model provides an initial County- and city-scale assessment of habitat condition and potential restoration or conservation opportunity. Site- or parcel-specific conditions must still be verified through field evaluation by a qualified professional. Model results are used with WSRRI and other spatial-priority information to identify mitigation opportunities that combine habitat quality with landscape importance, including locations within Core Areas, Growth Opportunity Areas, Corridors, and other habitat areas.

Washington Shrubsteppe Restoration and Resilience Initiative (WSRRI) Spatial Priority Data

The Washington Shrubsteppe Restoration and Resilience Initiative (WSRRI) provides spatial data to guide habitat protection, restoration, and investment. Its strategy focuses on protecting high-quality core habitat, expanding those cores into adjacent areas, and maintaining connections between them. This analysis relies primarily on the WSRRI Dry (Xeric) ecosystem dataset, which identifies priority areas within sagebrush and perennial grassland habitats. WSRRI also includes separate spatial priorities for Wet (Mesic) ecosystems and Greater Sage-grouse habitat. Within each of these three targets, WSRRI classifies Xeric habitats into four spatial designations:

- **Core Areas**: Large, high-quality, intact habitat blocks essential for long-term conservation and ecological resilience.
- **Growth Opportunity Areas** (GOAs): Moderately degraded habitat with high restoration potential, typically adjacent to Core Areas.
- **Corridors**: Areas that facilitate wildlife movement and genetic exchange between Cores and GOAs, helping to maintain ecological connectivity.
- **Other:** Habitat outside of the above designations — often more isolated or degraded, but still ecologically valuable.

This spatial hierarchy is used to determine the relative conservation value of both impacted areas and mitigation areas. In Benton County, the dry (xeric) ecosystem layers are used for analysis of shrubsteppe impacts and prioritization of restoration properties, while the mesic and sage grouse data may be used in a supplemental context.

WDFW Priority Habitats and Species (PHS) Shrubsteppe

The PHS shrubsteppe data provides a general view of where shrubsteppe habitats are likely located. While this is not a precise survey of shrubsteppe presence/absence, it provides a planning tool used in land use decisions to flag areas that require a site-specific evaluation. PHS data is a primary tool used by land use planners in reviewing the potential impacts of proposed developments on priority habitats, such as shrubsteppe. PHS shrubsteppe data was used to identify spatial extent of shrubsteppe habitat within each jurisdiction in Benton County. The PHS shrubsteppe areas included both "Presumptive Shrubsteppe" and "Shrubsteppe" areas.

Additionally, the WDFW Priority Habitats and Species (PHS) dataset identifies Biodiversity Areas and Corridors (BACs), which highlight regionally important intact landscapes that support core habitat and wildlife movement. BACs are also used in combination with WSRRI to determine spatial priority of shrubsteppe impacts.

20-Year Forecast of Potential Impacts for Each Jurisdiction

The analysis used the latest PHS shrubsteppe dataset available as of September 2025 to inventory the total acres of shrubsteppe that could potentially be impacted by future development. Potential impact acreage was calculated based on current land use designations within Benton County and its cities. The analysis included lands within city limits and Urban Growth Areas (UGAs), as well as Rural Community Centers and lands designated Heavy Industrial, Light Industrial, or RL-5 in unincorporated Benton County. The PHS shrubsteppe dataset was then intersected with the Benton County WSRRI/BAC datasets to characterize the full potential impact area within each jurisdiction and countywide. Results were organized by the four WSRRI categories and by "Other PHS Shrubsteppe," representing PHS-mapped shrubsteppe that does not overlap a WSRRI/BAC category, as shown in Table 2 and Figures 1 and 2.

Over the next 20 years, approximately 6,226 acres of shrubsteppe could be impacted by forecasted development, with 1,528 acres of potential impact over the next 5- years. These figures provide a high end estimate of potential impacts because the WDFW PHS shrubsteppe data tends to overestimate shrubsteppe extent, and a portion of potential shrubsteppe impacts would typically be avoided on-site. The summary also shows that approximately 79% of the forecasted shrubsteppe impacts occur within "WSRRI Other" or "Other PHS Shrubsteppe".

Table 2: Forecast Shrubsteppe Impacts by Jurisdiction & WSRRI Xeric Spatial Priority Area/PHS Biodiversity Areas & Corridors

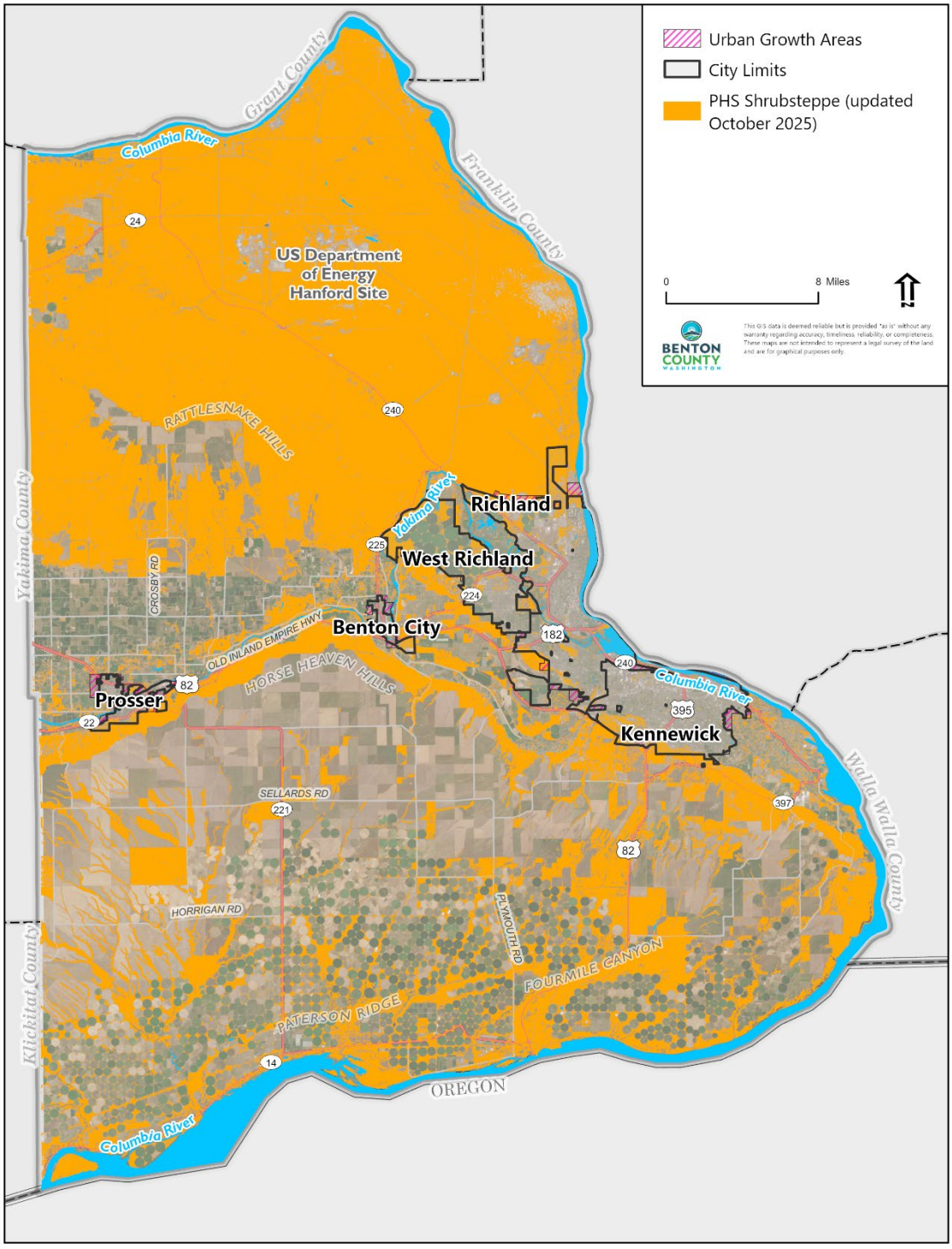
Jurisdictions	20-Year Impacts (Acres)	5-Year Impacts (Acres)	Percent
Benton City (City & UGA)	**10**	**2.50**	0.16%
Other PHS Shrubsteppe	10	2.50	0.16%
Prosser (City & UGA)	**109**	**27.50**	1.75%
WSRRI/BAC Corridor	21	5.25	0.34%
WSRRI Other habitat	53	13.25	0.85%
Other PHS Shrubsteppe	35	9.00	0.56%
West Richland (City & UGA)	**134**	**5.00**	2.16%
Other PHS Shrubsteppe	134	5.00	2.16%
Richland (City & UGA)	**1,001**	**250.00**	16.08%
WSRRI/BAC Corridor	218	54.50	3.50%
WSRRI Other habitat	165	41.25	2.65%
Other PHS Shrubsteppe	618	154.25	9.93%
Kennewick (City & UGA)	**1,082**	**270.75**	17.38%
WSRRI/BAC Corridor	2	0.50	0.03%
WSRRI Other habitat	667	166.75	10.71%
Other PHS Shrubsteppe	413	103.50	6.63%
Unincorporated Benton County	**3,889**	**972.25**	62.47%

WSRRI/BAC Core Area	241	60.25	3.87%
WSRRI/BAC Corridor	815	203.75	13.09%
WSRRI Growth Opportunity Area	42	10.50	0.67%
WSRRI Other habitat	1,194	298.50	19.18%
Other PHS Shrubsteppe	1,597	399.25	25.65%
Grand Total	**6,225**	**1,528**	100.00%

NOTES:

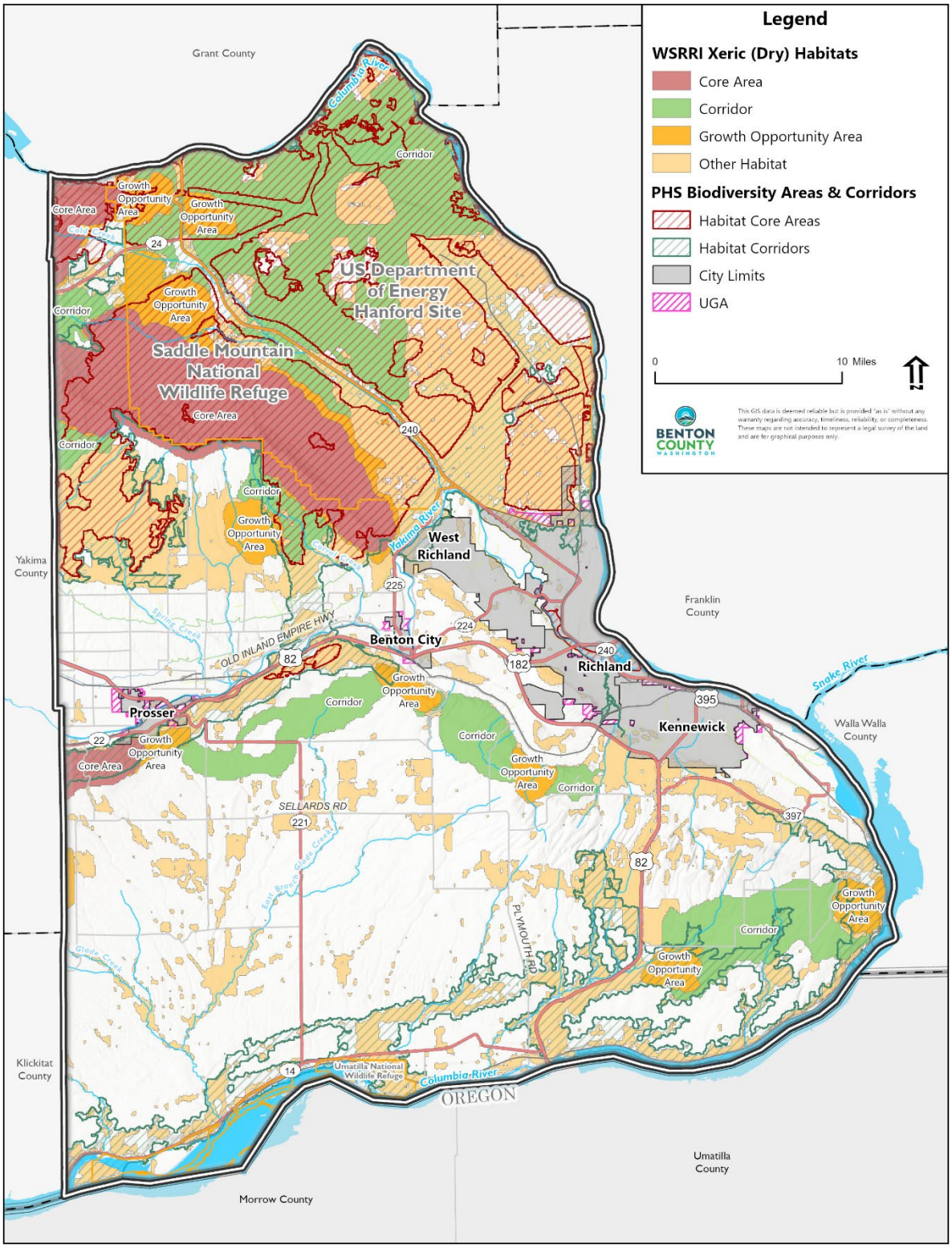
1. Totals include both PHS "Shrubsteppe" and "Presumptive Shrubsteppe"
2. "Other PHS Shrubsteppe" is shrubsteppe that does not fall within one of the WSRRI or PHS BAC spatial priority areas.

Figure 1: WDFW PHS Shrubsteppe



Mapped shrubsteppe extent provides a generalized estimate of shrubsteppe area. Some areas have already been developed or have other landcover types.

Figure 2: Shrubsteppe Spatial Habitat Area (PHS and WSRRI)



To provide an initial indication of the quality of shrubsteppe habitat areas that could be impacted by future development, the Benton CD shrubsteppe habitat quality model was intersected with the PHS and WSRRI shrubsteppe data sets. Habitat quality scores were generalized to range from 1(poor) to 4 (high), with a higher value indicating higher habitat quality/ecological function. A summary of the quality and spatial priority of forecasted shrubsteppe impacts within each jurisdiction is included in Table 3.

Table 3: Shrubsteppe Quality & Spatial Priority– 20 Year Impact Forecast

Quality: / Jurisdictions	Poor 1	Moderate 2	Good 3	High 4	Total	%
Benton City (City & UGA)	0.11	0.42	9.47	—	10	0.2%
Other PHS Shrubsteppe	0.11	0.42	9.47	—	10	0.2%
Prosser (City & UGA)	—	27	82	—	109	1.8%
WSRRI Corridor	—	6	15	—	21	0.3%
WSRRI Other habitat	—	11	42	—	53	0.9%
Other PHS Shrubsteppe	—	10	25	—	35	0.6%
West Richland (City & UGA)	3	19	107	5	134	2.2%
Other PHS Shrubsteppe	3	19	107	5	134	2.2%
Kennewick (City & UGA)	5.20	213	783	80.80	1,082	17.4%
WSRRI Corridor	—	1	1	—	2	0.0%
WSRRI Other habitat	0.20	102	513	51.80	667	10.7%
Other PHS Shrubsteppe	5	110	269	29	413	6.6%
Richland (City & UGA)	10.13	158	725	107.87	1,001	16.1%
WSRRI Corridor	0.13	18	169	30.87	218	3.5%
WSRRI Other habitat	—	10	134	21	165	2.7%
Other PHS Shrubsteppe	10	130	422	56	618	9.9%
Benton County	23.13	600	3,122.87	143	3,889	62.5%
WSRRI Core Area	0.13	45	195.87	—	241	3.9%
WSRRI Corridor	4	107	682	22	815	13.1%
WSRRI Growth Opportunity Area	—	5	37	—	42	0.7%
WSRRI Other habitat	3	152	980	59	1,194	19.2%
Other PHS Shrubsteppe	16	291	1,228	62	1,597	25.7%
Grand Total	**41.57**	**1,017.42**	**4,829.34**	**336.67**	**6,225**	**100.0%**
	1%	16%	78%	6%	100%	

Table 4 summarizes the percentage of total forecasted shrubsteppe impacts associated with each combination of habitat quality and spatial priority. These percentages can be used to forecast mitigation needs by multiplying the total acreage of anticipated shrubsteppe impacts for a given period by the percentage assigned to each quality and spatial-priority combination.

Table 4: Overall Shrubsteppe Quality & Spatial Priority of Impacted Habitat

Quality: / Jurisdictions	Poor 1	Moderate 2	Good 3	High 4	Grand Total
WSRRI Core Area	-	0.7%	3.1%	-	3.9%
WSRRI Growth Opportunity Area	-	0.1%	0.6%	-	0.7%
WSRRI Corridor	0.1%	2.1%	13.9%	0.9%	17.0%
WSRRI Other habitat	0.1%	4.4%	26.8%	2.1%	33.4%
Other PHS Shrubsteppe	0.5%	9.0%	33.1%	2.4%	45.1%
Grand Total	**0.7%**	**16.3%**	**77.6%**	**5.4%**	**100.0%**

Notes:

1. >95% of forecasted shrubsteppe impacts occur within the green highlighted range

Review of Tables 3 and 4 indicates that the majority of forecasted shrubsteppe impacts occur within areas classified as "WSRRI Other" habitat and shrubsteppe areas outside of WSRRI/BAC priority designations. These areas generally represent more fragmented or degraded shrubsteppe relative to WSRRI/BAC Core Areas, Growth Opportunity Areas, and Corridors, though they may still support native vegetation and wildlife.

Approximately 17% of potential impacts occur within WSRRI/BAC Corridors, which represent landscapes that support wildlife movement and ecological connectivity between larger habitat blocks. In most cases, development in these corridor areas is expected to consist of lower-intensity rural or residential development, which may allow for greater opportunities for avoidance, clustering, retention of native vegetation, and other on-site mitigation measures that maintain some level of habitat function and connectivity.

Although many impacts occur in areas classified as "Other" habitat, these lands can still provide important ecological functions, including wildlife movement, seasonal habitat use, and opportunities for habitat restoration. For this reason, the County's mitigation approach focuses on offsetting impacts through restoration or protection of shrubsteppe habitat in areas with higher ecological value or restoration potential, consistent with the WSRRI spatial prioritization framework.

Mitigation Properties Spatial Priority and Quality Metrics

Potential mitigation parcels were identified and prioritized throughout the County through analysis of various habitat quality and spatial priority metrics using a model developed by the Benton Conservation District. Figure 3 shows the spatial priority and shrubsteppe quality values of potential mitigation properties in the County. Table 5 summarizes countywide potential shrubsteppe mitigation acreage, organized by quality and spatial priority.

Figure 3: Shrubsteppe Mitigation Parcel Prioritization

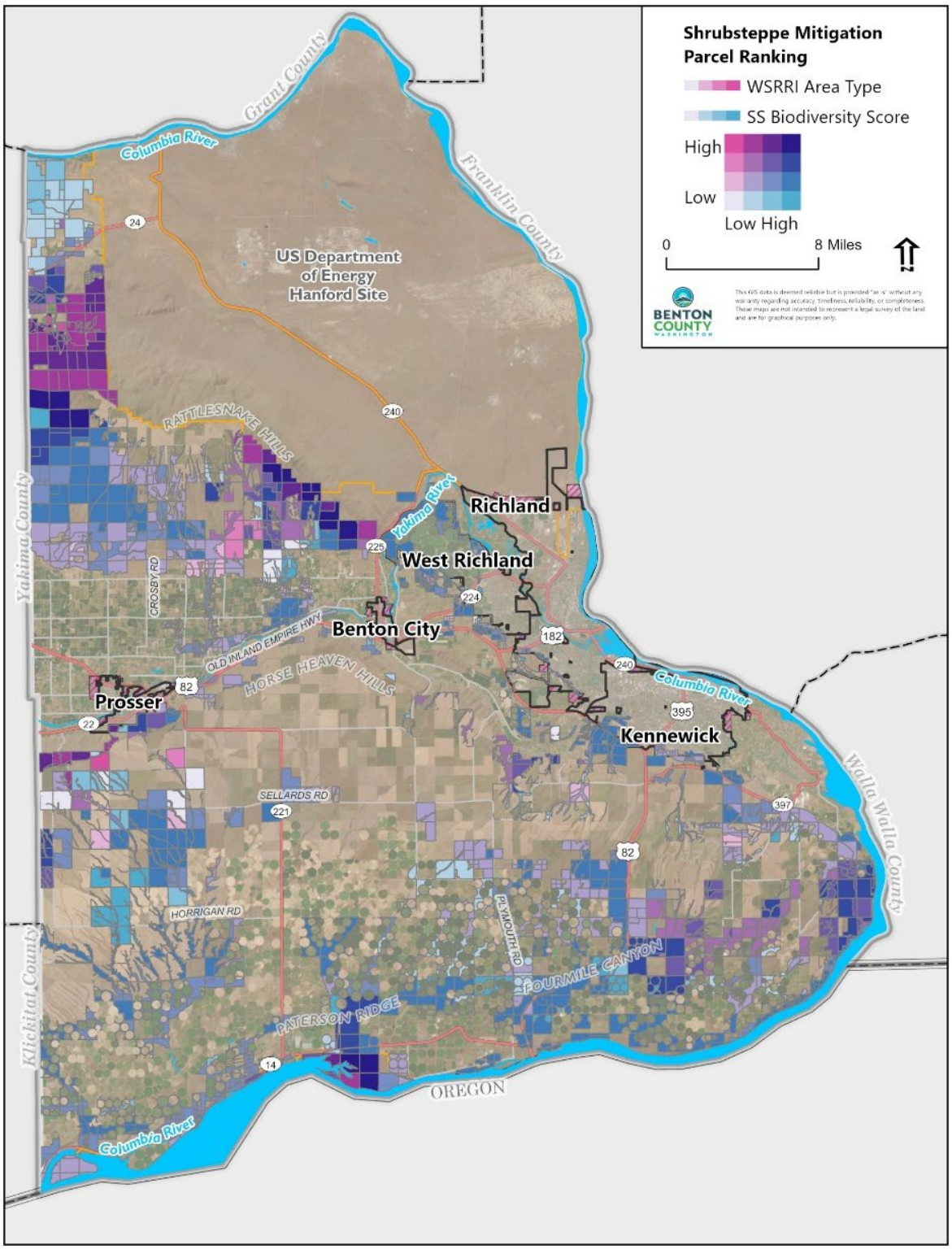


Table 5: Shrubsteppe Quality & Spatial Priority in Potential Mitigation Properties

WSSR/ BAC Spatial Priorities	Quality: Poor	Moderate	Good	High	Unknown	Total
Core Area	220	7,287	16,341	322	105	24,275
Growth Opportunity Area	38	3,497	9,789	311	494	14,130
Corridor	12	2,518	8,554	488	1,282	12,854
Other habitat	81	15,557	60,947	2313	6,316	85,214
Other PHS SS	139	5,115	16,874	451	5,603	28,184
Grand Total	**490**	**33,974**	**112,505**	**3,885**	**13,800**	**164,656**

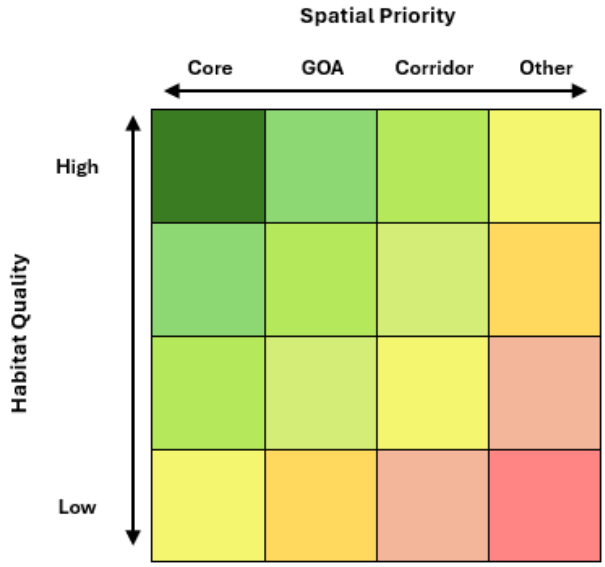
Translating Spatial and Habitat Quality Ratings into Debits & Credits

To establish a consistent and transparent method for evaluating impacts and mitigation, the program uses both **spatial priority** (where the site is located relative to core shrubsteppe and connectivity) and **ecological condition** (how well the site currently functions as shrubsteppe habitat). These two components are combined into a standardized credit/debit system.

- **Spatial Score:** Based on WSRRI ratings (e.g., Core, Connectivity, Restoration Opportunity), which identify the landscape priority of a site.
- **Function Score:** Based on the site's actual ecological condition, confirmed through field assessment. Several accepted methods may be applied:
    - **Ecological Integrity Assessment (EIA)** developed by the Washington Natural Heritage Program *(see Appendix for additional detail)*
    - **BLM AIM** (Assessment, Inventory, and Monitoring) *(see Appendix for additional detail)*
    - **WDFW PHS and other methods used by qualified professionals** for preparing critical area reports, that utilize principles consistent with EIA and BLM AIM but in a more streamlined approach.[2]
    - **Benton CD Shrubsteppe Quality Model,** with field verification and documentation in critical areas report.

[2] WDFW is developing a more streamlined shrubsteppe habitat assessment method, similar to a wetland rating form but adapted for shrubsteppe habitat conditions/functions, and this could be available for qualified professionals to use as early as 2027.

Figure 4: General Crediting Concept Based on Quality and Spatial Priority



Notes:

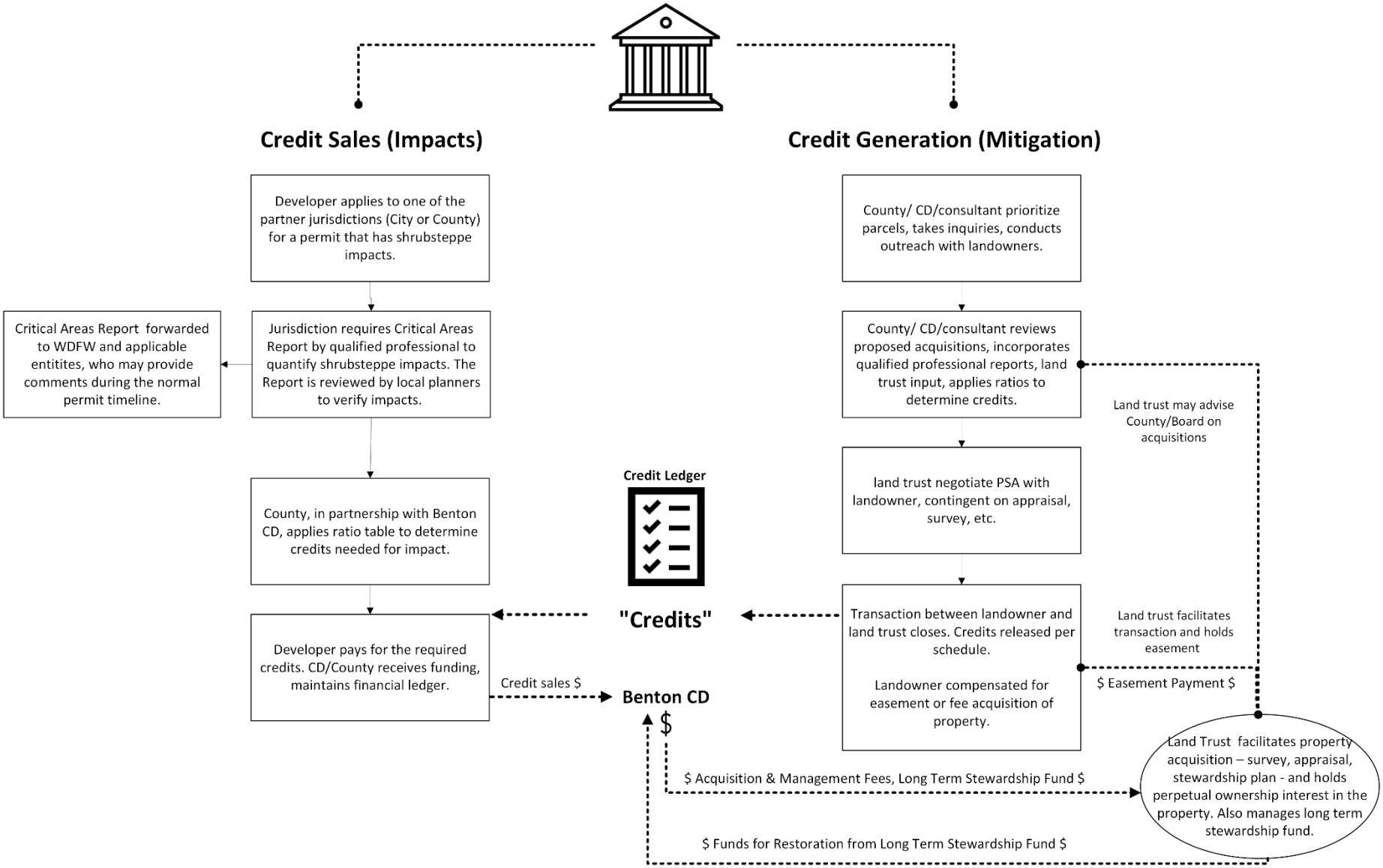
1. Core includes both WSRRI Xeric Core Areas and WDFW PHS Columbia Plateau Regional Biodiversity Areas.
2. Corridors include WSRRI Xeric Corridors and WDFW PHS Columbia Plateau Regional Biodiversity Corridors.

At the time of a development application with a potential to impact shrubsteppe habitat, the permitting jurisdiction (County/city) would provide this program description to the applicant to use in preparing a critical areas (CA) report (to be prepared by a qualified professional). The report would document observed shrubsteppe species and habitat features and confirm shrubsteppe habitat quantity and quality and WSRRI spatial ratings, incorporating applicable WDFW PHS recommendations.[3] (Note: This process assumes that the mitigation property and bank has been set up through a coordinated effort among the County, Cities, Benton CD and WDFW that includes mitigation property evaluation, credit establishment and monitoring and restoration strategy determined. Cost per credit would also be known at the time of application. This coordination process among the partners would occur each time a new property is brought into the bank and additional credits established).

Using the critical areas report, the permitting jurisdiction would determine the project's debit obligation and assign the required number of mitigation credits as a permit condition. The applicant would satisfy the obligation by purchasing those credits and providing verification to the County or city. See Figure 5 for a conceptual diagram of the impact and mitigation crediting process and the examples that follow to illustrate how the process might work.

[3] Threatened or endangered species presence and associated species-specific conditions to avoid or mitigate impacts may require additional permit conditions/requirements beyond shrubsteppe habitat loss mitigation.

Figure 5: Process Diagram

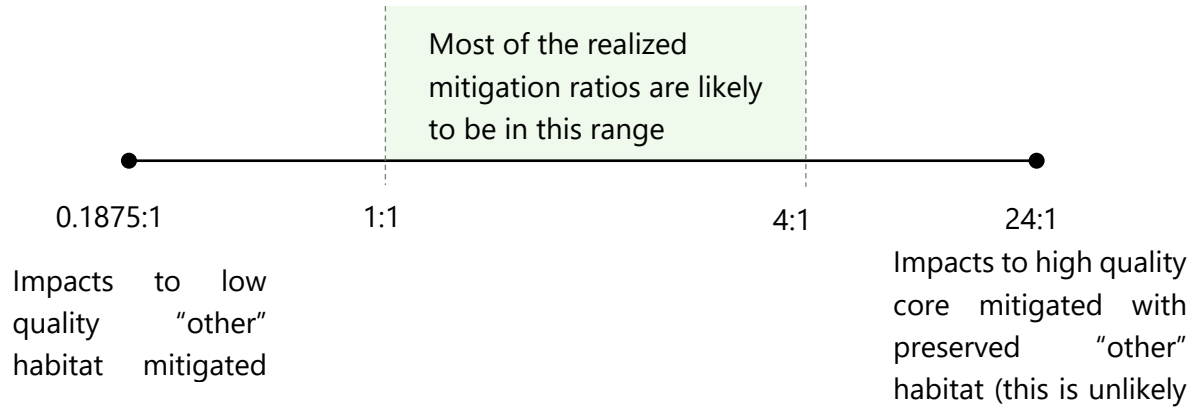


Calculating Impact and Mitigation Credits

Credits and debits are calculated independently based on the multipliers and formulas listed in Tables 6 & 7. An area of impacted shrubsteppe proposed for development is documented for habitat extent, quality and spatial priority through a qualified professional's CA report including associated WSRRI and PHS mapping to determine the appropriate multiplier. Some properties may have a range of quality or even spatial priorities, and these would be separated into sub-areas with varied multipliers applied. The overall process for determining and applying the applicable multipliers is:

1. **Initial screening**. Review PHS mapping, aerial imagery, and other available data to determine whether shrubsteppe may be present.
2. **Field assessment.** If shrubsteppe is present or reasonably suspected, a qualified professional delineates the habitat and documents its acreage, condition, and relevant features. The assessment should also document other known or observed priority species. However, the credit and debit framework described in this section addresses shrubsteppe habitat impacts only. Any species-specific avoidance, minimization, consultation, or compensatory mitigation requirements would be addressed separately through the applicable critical areas review and agency requirements.
3. **Assign spatial priority.** Use WSRRI, PHS, and other applicable data to classify each impact area. Areas with different classifications are evaluated separately.
4. **Assign habitat quality**. Classify each impact area using WDFW guidance, the Ecological Integrity Assessment, BLM AIM, or another scientifically valid method accepted by the County. Depending on the method that is used, qualified professional may need to convert the quality metric to the more general "High – Good – Moderate – Poor" categorization. Suggested conversions of BLM AIM and EIA quality metrics are included in Table 6.
   Calculate impact debits. Apply the quality and spatial multipliers to each assessment unit and sum the results to determine the total credits required.

The quality/spatial priority driven framework is designed to place greater mitigation obligations on impacts to higher-quality and higher-priority habitat, while directing mitigation toward strategically important sites, Mitigation credits also reflect the type of restoration activity appropriate for the bank property, as established by the baseline habitat quality at the site. The realized ratios resulting from the range from 0.1875:1 to 24:1, with recommended multipliers and ratios adapted from WDFW comments on previous versions of this program description, and Grant County mitigation banking guidance. Based on anticipated impact types and target mitigation properties, most realized ratios are expected to fall between 1:1 and 4:1.



Impact Debit Calculation

For shrubsteppe impacts, acres are multiplied by quality and spatial priority to account for both the ecological condition and landscape value of the habitat being lost. The habitat quality factor is determined via a site assessment using the WDFW PHS (as described in future guidance), BLM, or EIA methods. The spatial priority is determined based on the WSRRI or PHS spatial priority of the habitat. The formula to calculate impact debits would be:

Impact Debits Generated = Impact Acres × Quality Factor × Spatial-Priority Factor

Table 6: Impact and Spatial Priority Multipliers

BLM AIM Departure from Reference	EIA Score	Generalized Habitat Quality	Factor
None	A	High	1.00x
Slight to moderate	B	Good	0.75x
Moderate	C	Moderate	0.50x
Extreme	D	Poor[4]	0.375x

Spatial priority	Factor
WSRRI/PHS BAC Core Area	4x
WSRRI Growth Opportunity Area	3x
WSRRI/ PHS BAC Corridor	2x
WSRRI Other habitat/not mapped	1x

[4] An evenly stepped factor would be .25x, however, this was boosted to lift the lower-end mitigation ratios.

Credit (Mitigation) Calculation

For mitigation sites, acres are adjusted based on the type of mitigation activity and the spatial priority of the site. The framework is activity-based because the existing condition of a mitigation site, measured relative to its Natural Range of Variation (NRV), determines the action needed to maintain or improve ecological function. Sites substantially below NRV may require shrubsteppe reestablishment or rehabilitation, while sites at or near NRV may be more appropriate for enhancement, resilience measures, or preservation. This approach ties credit generation to the expected ecological benefit of the proposed action rather than assigning credits based solely on the site's existing quality.

The activity factor reflects the relative level of intervention and ecological uplift associated with reestablishment, rehabilitation, preservation with enhancement and resilience measures, or preservation only. The spatial-priority factor reflects the landscape value of completing mitigation within Core Areas, Growth Opportunity Areas, Corridors, or Other habitat.

The formula for calculating mitigation credits is:

Credits Generated = Mitigation Acres ÷ Activity Factor × Spatial-Priority Factor

Table 7: Mitigation Activity and Spatial Priority Multipliers

Existing Site Condition	Mitigation activity	Factor
Poor (<60% of NRV)	Reestablishment	2:1
Moderate (60–89% of NRV)	Rehabilitation	3:1
Good - High (≥90% of NRV)	Preservation with enhancement & resilience mechanisms[5]	4:1
Good – High ≥90% of NRV	Preservation only	6:1

Spatial priority	Factor
WSRRI/PHS BAC Core Area	4x
WSRRI Growth Opportunity Area	3x
WSRRI/PHS BAC Corridor	2x
WSRRI Other habitat/not mapped	1x

[5] *Preservation with enhancement & resilience mechanisms* refers to preservation through a conservation easement along with long term funding dedicated to restore the property if it is damaged in the future (eg. Wildfire), and other targeted long-term maintenance and resilience actions (eg. Invasive species control). This provides functional lift by increasing the probability that that site functions will exist over time.

Potential Realized Mitigation Ratios

The 16 possible debit classifications and 16 possible credit classifications produce 256 potential ratio combinations, ranging from approximately **24:1** to less than **0.20:1** (neither of these cases is expected to be realized based on the quality of shrubsteppe likely to be impacted and the targeted mitigation sites). Actual realized ratios are expected to fall within a narrower range between 1:1 and 4:1, based on the location of forecasted impacts and prospective mitigation sites. The full range of possible realized mitigation ratios is shown in Appendix C.

5-Year Mitigation Need Based on Forecasted Impacts

Using the 1,528 acres of potential shrubsteppe impacts forecast over the next five years, together with the spatial priority and estimated habitat quality of those impact areas, the County can estimate the total mitigation acreage required under the proposed ratio framework. The most likely mitigation-bank scenarios involve restoration or preservation (with enhancement and long-term resilience measures) within Growth Opportunity Areas or Corridors. The required acres to offset the 1,528 acres of forecasted impacts using each mitigation type are shown below:

Mitigation Scenario	5-Year Mitigation Acres Required
GOA Restoration	1,429 acres
GOA Preservation with enhancement & resilience mechanisms	1,906 acres
Corridor Restoration	2,148 acres
Corridor Preservation with enhancement & resilience mechanisms	2,858 acres

The actual mitigation need is likely to be lower than the estimates shown above. Consistent with mitigation sequencing, a portion of the forecasted impacts are expected to be avoided or minimized through project design and therefore would not require off-site compensatory mitigation. An example of the mitigation credit ledger showing both impacts and mitigation is shown in Appendix C – Mitigation Bank Ledger Example

Rationale for Mitigation Framework and Ratios

The mitigation ratios are structured to meet key ecological and implementation objectives through the following:

- **Assigns greater mitigation obligations to impacts affecting higher value shrubsteppe.** Impacts to higher-quality habitat and areas with greater landscape importance generate more debits, creating an incentive structure that encourages avoidance and minimization of impacts to the most ecologically valuable shrubsteppe.

- **Applies activity-specific ratios that account for the type of mitigation action**. Ratios are calibrated to reflect the expected functional lift and relative ecological value of each action, with greater credit assigned to actions that improve habitat condition and achieve a net ecological benefit.
- **Prioritizes protection of higher-quality habitat in areas of broader ecological significance** (WSRRI & BAC), directing mitigation to locations that provide the greatest regional habitat value, in alignment with State priorities and initiatives such as the Washington Habitat Connectivity Action Plan.
- **Strongly disincentivizes use of non-functional or very poor-quality habitat for mitigation** unless restoration to higher quality occurs, preventing low-value habitat from being used to offset meaningful impacts.
- **Supports transparent and adaptable implementation.** The decoupled framework allows impact areas and mitigation units with different conditions to be evaluated separately and can be updated as WDFW guidance, monitoring results, and banking experience evolve. This maintains transparency and simplicity during program implementation.

Worked Examples

The following worked examples illustrate how impact and mitigation would be credited under the proposed framework. Benton County has also developed a mitigation calculator that can be used to perform example calculations.

Example 1 — Debit. A development would impact 10 acres of "Good" quality (EIA Score B) habitat within a WSRRI "Corridor". The formula is 10 acres × 0.75 ("Good" quality multiplier) × 2 ("Corridor" spatial priority multiplier) = 15 credits required

Example 2 — Credit. A mitigation project would reestablish 6 acres of "Poor" quality habitat within a WSRRI "Core Area" and restore it to "High" quality. The formula is 6 acres ÷ 2 (reestablishment ratio) × 4 ("Core Area" spatial-priority multiplier) = **12 credits generated**.

Example 3 — Full transaction. A development would impact 10 acres of "Poor" quality habitat within a WSRRI "Other" area. The formula is 10 acres × 0.375 ("Poor" quality multiplier) × 1 ("Other" spatial-priority multiplier) = **3.75 credits required**. The impact would be offset by reestablishing 2.5 acres of shrubsteppe within a WSRRI "Core Area." The formula is 2.5 acres ÷ 2 (reestablishment ratio) × 4 ("Core Area" spatial-priority multiplier) = **5 credits generated**. The mitigation obligation would be satisfied, with **1.25 credits remaining**.

Accounting for Restoration/ Enhancement

Preservation through a conservation easement provides the baseline protection for each mitigation property. Additional credits may be generated through preservation with enhancement, rehabilitation, or reestablishment. The applicable activity will be determined based

on existing site condition, expressed as poor, moderate, good, or high quality, or as the degree of departure from the Natural Range of Variability (NRV), as shown in Table 7.

A restoration and management plan will establish the proposed activities, success criteria, monitoring requirements, adaptive management provisions, and credit-release schedule. This approach ties credit generation to existing condition, the mitigation activity performed and demonstrated functional lift rather than assuming restoration to a uniform reference condition.

Additionally, a long-term stewardship fund will be established for each mitigation property to support ongoing monitoring, maintenance, adaptive management, and response to unforeseen impacts such as wildfire, invasive species, vandalism, or fence damage. The fund will be capitalized as part of the mitigation cost and remain dedicated to maintaining the property's habitat functions and values over time.

Mitigation Credit Ledger

All impacts and mitigation activities within the program are tracked using a centralized debit and credit ledger, which functions as the program's official accounting system. Each recorded entry converts impacted acres into debits with credits applied using the ratios prescribed per Tables 6 and 7. The ledger maintains a running balance of available, pending, and released credits for each mitigation banked property, ensuring transparency and consistency across transactions. Credits are available for purchase by a developer once a conservation easement with restoration plan is place and total mitigation bank costs for the property, including restoration or enhancement costs are known. Internal to the bank, credits from restoration are released to the bank as described above. This approach allows the program to maintain a clear, auditable record of credits and ensures that all mitigation obligations are properly accounted for over the lifetime of the program. The County has developed a conceptual version of the debit/credit ledger, as illustrated in Appendix C.

Credit Release Staging

Credit release for mitigation is tied to verified conditions. While projects that only involve preservation are discouraged, if they were to occur, they will release 100% of the credits when the transfer of ownership interest closes. Mitigation projects that include restoration activities will have multiple credit release stages tied to the preservation and restoration outcomes. The schedule below outlines the suggested conditions under which credits are released for an acquisition and restoration project, ensuring that credits correspond to measurable outcomes.

Credit Release Schedule:

Stage	Credit Release Condition	Credits Released
1	Conservation easement secured	50%
2	Activity-specific implementation/restoration completed and long-term stewardship fund fully established	25%
3	Follow-up EIA/AIMs/other habitat assessment after 3-5 years shows progress toward quality benchmarks and anticipated functional lift.	25%

Establishing Per Credit Cost

Mitigation credit costs are under development and will be specific to the actual mitigation properties permanently protected and the associated restoration activities. Credit costs will be established prior to this program being launched, which is expected in 2027. Cost factors include land survey, baseline conditions report, conservation easement terms and conditions, restoration plan and implementation, ongoing stewardship, and ongoing administration expenses.

Benton County and Partners, and Mitigation Landholder Roles and Responsibilities

The Benton CD modeling was used to identify high-quality candidate properties and preliminary contact has been made with some landowners regarding potential participation in the program. The County is in discussions with a land trust that would serve as the holder of ownership rights is responsible for ensuring that mitigation properties provide lasting conservation benefits. Ownership rights may be secured through fee-simple acquisition or conservation easements, both of which permanently protect the property and generate mitigation credits for the program. Additional credits may also be secured through rehabilitation and re-establishment of shrubsteppe, which will also require monitoring and maintenance. The land trust organization would partner with the Conservation District for baseline habitat conditions assessment, restoration planning and implementation and potentially other areas of support, as needed. A responsible, accountable, consulted and informed (RACI) matrix was developed to outline the various roles and responsibilities for various program development and implementation efforts, as provided in Appendix B.

Grazing and Other Land Use on Mitigation Properties

Grazing and other vegetation or land management practices may be used as tools to achieve desired conservation outcomes on mitigation properties. Their application should be evaluated in developing the restoration plan and stewardship strategy for the mitigation property and desired management measures to meet habitat function goals.

Mitigation Bank Establishment and Program Management

Discussion is ongoing among partner entities (County/Benton CD/land trust) to determine various roles and responsibilities. Some responsibilities, as described above, are better understood, while others are still being confirmed. Once the results from these discussions are finalized, then they will be documented in an updated version of this program description. The current understanding of roles and responsibilities are summarized in the responsible, accountable, consulted and informed (RACI) matrix was developed to outline the various roles and responsibilities for various program development and implementation efforts, as provided in Appendix C.

Monitoring and Adaptive Management

Because this is a new program that is still under development and brings together new partners, responsibilities, and procedures, adaptive management and ongoing program refinement should be expected. Program participation, implementation costs, administrative procedures, and effectiveness in achieving no net loss of shrubsteppe ecological functions will be monitored and reviewed at least annually in coordination with program partners. This programmatic review will include a comprehensive evaluation of mitigation properties, available and used credits, restoration and stewardship performance, monitoring results, and any emerging implementation issues. Recommended adjustments to ratios, procedures, roles, monitoring requirements, or other program components may be identified and incorporated as appropriate.

The program is also being developed and implemented in advance of WDFW's updated shrubsteppe habitat protection and mitigation guidance due to Growth Management Act deadlines. Additional refinements may therefore be necessary once that guidance and associated management recommendations are finalized.

Monitoring and adaptive management will also be incorporated into the long-term restoration, enhancement, and stewardship of individual mitigation properties. Monitoring results will be used to evaluate whether performance standards are being met and to identify corrective actions or changes in management where needed.

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Appendix A

Habitat Assessment Methods

Ecological Integrity Assessment

The Ecological Integrity Assessment (EIA), developed by the Washington Natural Heritage Program, provides a science-based method for evaluating habitat condition. It uses a suite of standardized, habitat-specific metrics to assess key ecological attributes (KEAs), including native vegetation composition, invasive species presence, shrub structure, soil and hydrologic function, and vegetation structure and diversity.

Each metric is evaluated independently using a four-tiered rating system, with ratings based on how closely the site conditions align with the Natural Range of Variability (NRV). NRV values are derived from a separate local reference site that represents the best achievable ecological condition for the relevant habitat type. Ranks are converted to numerical values, weighted by ecological significance, and then aggregated to calculate a final ecological integrity score (Table 3). This score is translated into an overall site condition rank, as shown below.

Table. Ecological Integrity Assessment Scoring Framework. This table outlines how individual ranks (A–D) are numerically translated and averaged across Key Ecological Attributes (KEAs) to produce a final EIA score. The final score determines the overall site condition rank, which informs the appropriate mitigation activity. Metric scores are based on alignment with the Natural Range of Variability (NRV) established from a reference site.

Rank	Metric Score	KEA/Final Score
A	5	4.5-5.0
B	4	3.5-4.4
C	3	2.5-3.4
D	1	1.0-2.4

This standardized scoring system allows mitigation sites to be objectively evaluated and compared across landscapes and projects.

BLM AIMs Rating System

The **BLM AIMs Score** is a standardized ecological rating based on the Bureau of Land Management's (BLM) **Assessment, Inventory, and Monitoring (AIM)** strategy. AIM is a framework used across the western U.S. to collect standardized data on the condition of public lands.

This score describes how much a site has departed from its "reference condition," which represents the natural and resilient state of the ecosystem. The score is categorized into descriptive tiers:

- **Near Reference:** The site is functioning as expected with minimal human-caused alterations.
- **Slight Departure:** The site shows minor changes from its reference condition.
- **Moderate Departure:** The site exhibits significant changes in ecological attributes.
- **Extreme Departure:** The site's ecological functions and species composition are severely altered from the reference condition.

WDFW PHS Guidance

WDFW is developing updated guidance that is anticipated to include a simplified shrubsteppe quality-assessment protocol. Once published, that protocol could be incorporated into this framework as an additional County-approved method for assigning Poor, Moderate, Good, or High habitat-quality classifications.

Appendix B
Roles and Responsibilities for Program Administration

Benton County Shrubsteppe Mitigation Program — RACI Chart								
Task / Activity	Benton County	Cities (Kennewick, Richland, etc.)	White Bluffs Consulting / AC Geo	Benton Conservation District (CD)	Land Trust FORTERRA	WDFW	Developer / Applicant	Qualified Professional (General – not per CAO)
Lead program development and coordinate among jurisdictions	A	A	R	C	C	C		
Adopt and update program regulations (Critical Areas Ordinances)	R/A	R/A	C	C		C		
Establish and maintain governance structure	R/A	R/A	C	C	C	C		
Coordinate with WDFW on program design and requirements	A	A	R	C	C	C		
Mitigation properties evaluation	A	I	R	C	C	C		
Update 20-year demand projections every ~5 years	R	R		C		C		

Benton County Shrubsteppe Mitigation Program — RACI Chart								
Task / Activity	Benton County	Cities (Kennewick, Richland, etc.)	White Bluffs Consulting / AC Geo	Benton Conservation District (CD)	Land Trust FORTERRA	WDFW	Developer / Applicant	Qualified Professional (General – not per CAO)
Develop and maintain Shrubsteppe Biodiversity Potential (SSBP) model	I	C		R/A		C		
Maintain WSSRI spatial priority data and maps	C	C		C		R/A		
Maintain WDFW PHS shrubsteppe dataset	C	C		I		R/A		
Prioritize and map potential mitigation parcels	R	C		I	C	C		
Maintain centralized mitigation credit ledger	R/A	C		C	C	I		
Require critical areas (CA) report at time of development application	R/A	R/A				I		

Benton County Shrubsteppe Mitigation Program — RACI Chart								
Task / Activity	Benton County	Cities (Kennewick, Richland, etc.)	White Bluffs Consulting / AC Geo	Benton Conservation District (CD)	Land Trust FORTERRA	WDFW	Developer / Applicant	Qualified Professional (General – not per CAO)
Prepare Critical Areas / shrubsteppe impact report	I	I				I	A	R
Verify habitat quality and WSSRI spatial ratings in field	I	I				C	A	R
Calculate credits/debits required for development impacts	R/A	R/A				I	I	R
Establish permit conditions specifying mitigation obligation	R/A	R/A				I	I	
Draft generic (non-property specific) Mitigation Banking Instrument (MBI)	C/A	I		I	R			

Benton County Shrubsteppe Mitigation Program — RACI Chart								
Task / Activity	Benton County	Cities (Kennewick, Richland, etc.)	White Bluffs Consulting / AC Geo	Benton Conservation District (CD)	Land Trust FORTERRA	WDFW	Developer / Applicant	Qualified Professional (General – not per CAO)
Draft generic (non-property specific) Conservation Easement (CE)	R	I		C	R/A	C		
Identify and contact potential mitigation landowners	A	I	R	R	C	I/C		
Conduct property appraisal	A	I		C	R			R
Complete survey, Phase I ESA, habitat assessment, and baseline report	A	I		C/R (habitat)	R	C		R
Draft and execute Mitigation Banking Instrument (MBI) / legal documents	C/A	C		C	R	I		

Benton County Shrubsteppe Mitigation Program — RACI Chart								
Task / Activity	Benton County	Cities (Kennewick, Richland, etc.)	White Bluffs Consulting / AC Geo	Benton Conservation District (CD)	Land Trust FORTERRA	WDFW	Developer / Applicant	Qualified Professional (General – not per CAO)
Secure conservation easement or fee-simple acquisition	C/A	C		C	R	I		
Pay escrow, title insurance, and transaction costs	R/A	I			C			
Pay CE stewardship or MBI long-term reserve fees	R/A	I		C/R	C			
Release credits upon verified conservation easement / acquisition	R/A	I		I	I	I		
Release credits upon completion of restoration activities	R/A	I		C/R	I	c		R
Release final credits upon habitat quality benchmark verification	A	A		R	I	I		

Benton County Shrubsteppe Mitigation Program — RACI Chart								
Task / Activity	Benton County	Cities (Kennewick, Richland, etc.)	White Bluffs Consulting / AC Geo	Benton Conservation District (CD)	Land Trust FORTERRA	WDFW	Developer / Applicant	Qualified Professional (General – not per CAO)
Receive payment for credit purchases (TBD - pending agreement)	C	C		R	I	I	R	
Satisfy mitigation obligation by purchasing credits	C	C		R	I	I	R/A	
Plan and implement restoration/enhancement activities	A	I		R	R	C		R (if needed)
Conduct long-term stewardship of mitigation properties	A	I		C	R	C		
Monitor CE compliance and habitat condition (remote, 4 of 5 yrs)	I	I		C/R (5 yr)	R/A	C		
Manage MBI long-term reserve fund	I	I		C	R/A	I		

Benton County Shrubsteppe Mitigation Program — RACI Chart								
Task / Activity	Benton County	Cities (Kennewick, Richland, etc.)	White Bluffs Consulting / AC Geo	Benton Conservation District (CD)	Land Trust FORTERRA	WDFW	Developer / Applicant	Qualified Professional (General – not per CAO)
Respond to casualty losses on mitigation properties	C/A	I		C	R	C		
Coordinate grazing/land-use practices on mitigation properties (if grazing part of mgmt. plan)	C/A	I		C/R (grazing mgmt.)	R	C		

LEGEND

R — Responsible — does the work	**A —** Accountable — owns the outcome	**C —** Consulted — provides input	**I —** Informed — kept in the loop

Notes: R/A indicates a single party that is both Responsible and Accountable for a task. Mitigation Review Team composition to be established by Benton County and partner jurisdictions. Credit purchase payment recipient is pending agreement among partner entities. Per-credit cost estimated at $4,000–$5,500 (subject to revision). PNNL mitigation (134 acres / 403 required mitigation acres) is administered through separate Benton CD agreements

Appendix C

Realized Mitigation Ratios & Ledger Example

Application of the multipliers listed in Tables 6 and 7 can result in 16 potential impact and mitigation values per acre. This results in 256 potential realized mitigation ratios, as shown below.

Impacts Matrix

	Core	Goa	Corridor	Other
High	4	3	2	1
Good	3	2.25	1.5	0.75
Moderate	2	1.5	1	0.5
Poor	1.5	1.125	0.75	0.375

Mitigation Matrix

	Core	Goa	Corridor	Other
Reestablishment	2.00	1.50	1.00	0.50
Rehabilitation	1.33	1.00	0.67	0.33
Preserve & Enhance	1.00	0.75	0.50	0.25
Preserve Only	0.67	0.50	0.33	0.17

Realized Mitigation Ratios Table

	Mitigation Activity															
Impact	**Core Reest.**	**Core Restore**	**Core P&E**	**Core Preserve Only**	**GOA Reest.**	**GOA Restore**	**GOA P&E**	**GOA Preserve Only**	**Corridor Reest.**	**Corridor Restore**	**Corr. P&E**	**Corridor Preserve Only**	**Other Reest.**	**Other Restore**	**Other P&E**	**Other Preserve Only**
Core H	2.00:1	3.00:1	4.00:1	6.00:1	2.67:1	4.00:1	5.33:1	8.00:1	4.00:1	6.00:1	8.00:1	12.00:1	8.00:1	12.00:1	16.00:1	24.00:1
Core G	1.50:1	2.25:1	3.00:1	4.50:1	2.00:1	3.00:1	4.00:1	6.00:1	3.00:1	4.50:1	6.00:1	9.00:1	6.00:1	9.00:1	12.00:1	18.00:1
Core M	1.00:1	1.50:1	2.00:1	3.00:1	1.33:1	2.00:1	2.67:1	4.00:1	2.00:1	3.00:1	4.00:1	6.00:1	4.00:1	6.00:1	8.00:1	12.00:1
Core P	0.75:1	1.13:1	1.50:1	2.25:1	1.00:1	1.50:1	2.00:1	3.00:1	1.50:1	2.25:1	3.00:1	4.50:1	3.00:1	4.50:1	6.00:1	9.00:1
GOA H	1.50:1	2.25:1	3.00:1	4.50:1	2.00:1	3.00:1	4.00:1	6.00:1	3.00:1	4.50:1	6.00:1	9.00:1	6.00:1	9.00:1	12.00:1	18.00:1
GOA G	1.13:1	1.69:1	2.25:1	3.38:1	1.50:1	2.25:1	3.00:1	4.50:1	2.25:1	3.38:1	4.50:1	6.75:1	4.50:1	6.75:1	9.00:1	13.50:1
GOA M	0.75:1	1.13:1	1.50:1	2.25:1	1.00:1	1.50:1	2.00:1	3.00:1	1.50:1	2.25:1	3.00:1	4.50:1	3.00:1	4.50:1	6.00:1	9.00:1
GOA P	0.56:1	0.84:1	1.13:1	1.69:1	0.75:1	1.13:1	1.50:1	2.25:1	1.13:1	1.69:1	2.25:1	3.38:1	2.25:1	3.38:1	4.50:1	6.75:1
Corr H	1.00:1	1.50:1	2.00:1	3.00:1	1.33:1	2.00:1	2.67:1	4.00:1	2.00:1	3.00:1	4.00:1	6.00:1	4.00:1	6.00:1	8.00:1	12.00:1
Corr G	0.75:1	1.13:1	1.50:1	2.25:1	1.00:1	1.50:1	2.00:1	3.00:1	1.50:1	2.25:1	3.00:1	4.50:1	3.00:1	4.50:1	6.00:1	9.00:1
Corr M	0.50:1	0.75:1	1.00:1	1.50:1	0.67:1	1.00:1	1.33:1	2.00:1	1.00:1	1.50:1	2.00:1	3.00:1	2.00:1	3.00:1	4.00:1	6.00:1
Corr P	0.38:1	0.56:1	0.75:1	1.13:1	0.50:1	0.75:1	1.00:1	1.50:1	0.75:1	1.13:1	1.50:1	2.25:1	1.50:1	2.25:1	3.00:1	4.50:1
Othr H	0.50:1	0.75:1	1.00:1	1.50:1	0.67:1	1.00:1	1.33:1	2.00:1	1.00:1	1.50:1	2.00:1	3.00:1	2.00:1	3.00:1	4.00:1	6.00:1
Othr G	0.38:1	0.56:1	0.75:1	1.13:1	0.50:1	0.75:1	1.00:1	1.50:1	0.75:1	1.13:1	1.50:1	2.25:1	1.50:1	2.25:1	3.00:1	4.50:1
Othr M	0.25:1	0.38:1	0.50:1	0.75:1	0.33:1	0.50:1	0.67:1	1.00:1	0.50:1	0.75:1	1.00:1	1.50:1	1.00:1	1.50:1	2.00:1	3.00:1
Othr P	0.1875:1	0.28:1	0.38:1	0.56:1	0.25:1	0.375:1	0.50:1	0.75:1	0.38:1	0.56:1	0.75:1	1.13:1	0.75:1	1.13:1	1.50:1	2.25:1

= bank transactions based on extent of forecasted impacts and planned mitigation properties

Mitigation Bank Ledger Example

IMPACTS IMPACT DEBIT LEDGER

ID	JURISDICTION	ACRES	PRIORITY	QUALITY	DEBITS	
001	Unincorporated Benton County	11.00	Core	Moderate	22.00	×
002	Unincorporated Benton County	48.13	Core	Good	144.40	×
003	Unincorporated Benton County	1.22	GOA	Moderate	1.83	×
004	Unincorporated Benton County	9.00	GOA	Good	20.25	×
005	Unincorporated Benton County	1.00	Corridor	Poor	0.75	×
006	Unincorporated Benton County	32.39	Corridor	Moderate	32.39	×
007	Unincorporated Benton County	212.85	Corridor	Good	319.27	×
008	Richland	12.98	Corridor	High	25.96	×
009	Richland	9.17	Other	Poor	3.44	×
010	Unincorporated Benton County	205.00	Other	Moderate	102.50	×
011	Unincorporated Benton County	915.42	Other	Good	686.57	×
012	Unincorporated Benton County	69.84	Other	High	69.84	×
TOTAL		1528.00			1429.20	

CREDITS MITIGATION BANK CREDIT LEDGER

BANK / CREDIT SOURCE: e.g. Fourmile Canyor | ACRES: 0.00 | SPATIAL PRIORITY: Corridor (×2) | ACTIVITY: Preservation w/ enha | + ADD

SOURCE	ACRES	PRIORITY	ACTIVITY	CREDITS	
P01	1000.00	Corridor	Restore	666.67	×
P02	1600.00	Corridor	Preserve & Enhance	800.00	×
TOTAL	2600.00			1466.67	

MITIGATION BALANCE SUMMARY

SURPLUS | ⇓ EXPORT CSV

TOTAL DEBITS	TOTAL CREDITS	NET BALANCE	REALIZED RATIO
1429.20	1466.67	+37.47	1.00:1
impact acre-equivalents	mitigation acre-equivalents	Balance: +37.47	offset requirement met

REFERENCE — LOOKUP MATRICES

Quality / Priority	Core	GOA	Corridor	Other
High	4.00	3.00	2.00	1.00
Good	3.00	2.25	1.50	0.75
Moderate	2.00	1.50	1.00	0.50
Poor	1.50	1.125	0.75	0.375

Impact debit matrix (per acre)

Activity / Priority	Core	GOA	Corridor	Other
Reestablish	2.00	1.50	1.00	0.50
Restore	1.33	1.00	0.67	0.33
Preserve & Enhance	1.00	0.75	0.50	0.25
Preserve Only	0.67	0.50	0.33	0.17

Mitigation credit matrix (per acre)

Appendix O
Wildland Urban Interface Memorandum

DRAFT Memorandum

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

From: Ben Floyd, Adam Cares

Date: March 26, 2026

Re: WUI

Introduction

Recent updates to state law require counties to address wildfire hazard and risk in long-range planning and development regulations. Under RCW 36.70A.070, the Comprehensive Plan land use element must reduce risks to life and property from wildfire using siting, design standards, and community preparedness measures.

Engrossed Substitute Senate Bill 6120 (2024) established a statewide framework for wildfire hazard and risk mapping and amends the state building code (19.278 RCW) to require application of Wildland Urban Interface (WUI) standards in areas designated as "high" and "very high" hazard. The law directs the Washington State Department of Natural Resources (DNR) to develop these maps and requires local jurisdictions to apply ignition-resistant construction and access standards in mapped areas, while allowing integration of local data consistent with state criteria.

This memo summarizes these requirements and provides recommendations for incorporating WUI mapping, hazard and risk analysis, and related policy and regulatory tools into the Comprehensive Plan update, building on existing efforts such as the strategies identified in the County's current Community Wildfire Protection Plan (2018), ongoing landowner education efforts provided by the County and its emergency management partners, and related planning work to identify priority areas and implement targeted risk reduction strategies.

Wildland Urban Interface

RCW 36.70A.030 (53) defines the wildland urban interface (WUI) as the geographical area where structures and other human development meets or intermingles with wildland vegetative fuels. The Benton County Community Wildfire Protection Plan (2018) defines the wildland urban

interface (WUI) as "areas where wildland vegetation meets urban developments or where forest fuels meet urban fuels such as houses".[1].

Wildfire Hazard and Risk

Current Federal and State WUI planning requirements are generally driven and informed by wildfire **hazard** and **risk**.

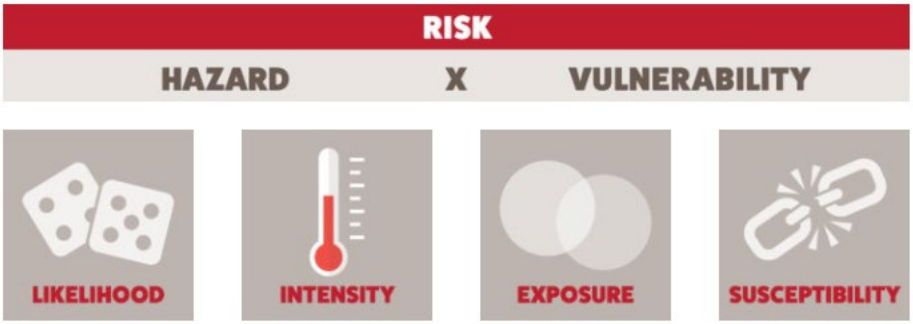
WILDFIRE HAZARD:
"How likely is fire behavior to occur here?"

WILDFIRE RISK:
"What are the consequences – to people, structures, infrastructure, and ecosystems - if fire occurs here?"

Wildfire hazard refers to the likelihood that wildfire could occur in a certain area based on environmental conditions. Hazard focuses on the potential for wildfire to occur and behave in a certain way based on landscape and environmental conditions. Hazard is a function of both the likelihood and intensity of a potential wildfire[2].

Wildfire risk refers to the chance a wildfire will ignite, spread, and cause negative impacts to assets such as homes or infrastructure[3]. Wildfire risk describes the potential for wildfire to cause harm to people, property, infrastructure, and ecological resources. Risk is influenced by both the level of wildfire hazard, the probability of wildfire occurrence, and the vulnerability of a given area.

Figure 1: Relationship of Wildfire Hazard and Risk



Source: US Forest Service Wildfire Risk to Communities - Understand Risk

[1] Benton County Community Wildfire Protection Plan, 2018, p.54
https://dnr.wa.gov/sites/default/files/2025-03/rp_burn_cwpp_benton_2018.pdf
[2] U.S. Department of Agriculture Forest Service, *Wildfire Risk to Communities: Understand Risk*, available at: https://wildfirerisk.org/understand-risk/

[3] DNR Wildfire Hazard and Risk Mapping – *Glossary of Terms,* available at:
https://dnr.wa.gov/sites/default/files/2026-01/rp_whrm_glossary_2026.pdf

DNR Hazard and Risk Mapping Effort

In 2018, the Legislature adopted Senate Bill 6109, amending RCW 19.27.560 and directing DNR to develop a statewide WUI map to support application of WUI building code requirements. The resulting 2019 map broadly classified much of the state as WUI based primarily on the presence of existing structures, limiting its usefulness for identifying areas of actual wildfire hazard and risk and resulting in overly broad application of WUI standards[4].

To address these limitations, the Legislature adopted Engrossed Substitute Senate Bill 6120 (2024), which shifts the mapping approach to hazard- and risk-based analysis. As directed by this updated statute, DNR is developing new statewide wildfire hazard and risk maps to identify "high" and "very high" hazard areas where WUI code requirements will apply. Several informational meetings about the mapping effort were held in February and March 2026 where DNR staff shared information on how these maps were developed and how they will be applied. Highlights of this information are provided in the following sections.

DNR Hazard Map

The statewide wildfire hazard map represents both burn probability (likelihood of wildfire occurrence) and intensity (predicted flame length) for a given area. Hazard is classified into low, moderate, high, and very high categories based on modeled fire occurrence probability and intensity. Under ESB 6120, areas designated as "high" and "very high" hazard are required to implement provisions of the International Wildland Urban Interface Code. The map is developed using fire behavior modeling that incorporates fuels, weather, topography, and historic fire ignition data to simulate wildfire frequency and intensity. Hazard ratings are aggregated to community boundaries and applied at a parcel-level scale to support local planning and code implementation[5].

DNR Risk Map

Wildfire risk reflects the combination of wildfire hazard and the vulnerability of high-value resources and assets. DNR is also creating a "base-level" risk map characterizing the default statewide map for all counties, which will be periodically updated based on local risk assessments. The map is intended to support local planning and emergency response efforts.

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[4] Washington State Association of Counties, 2024
https://members.wsac.org/news/advocacy/33/33-WUI-Fix-Bill-Still-Moving

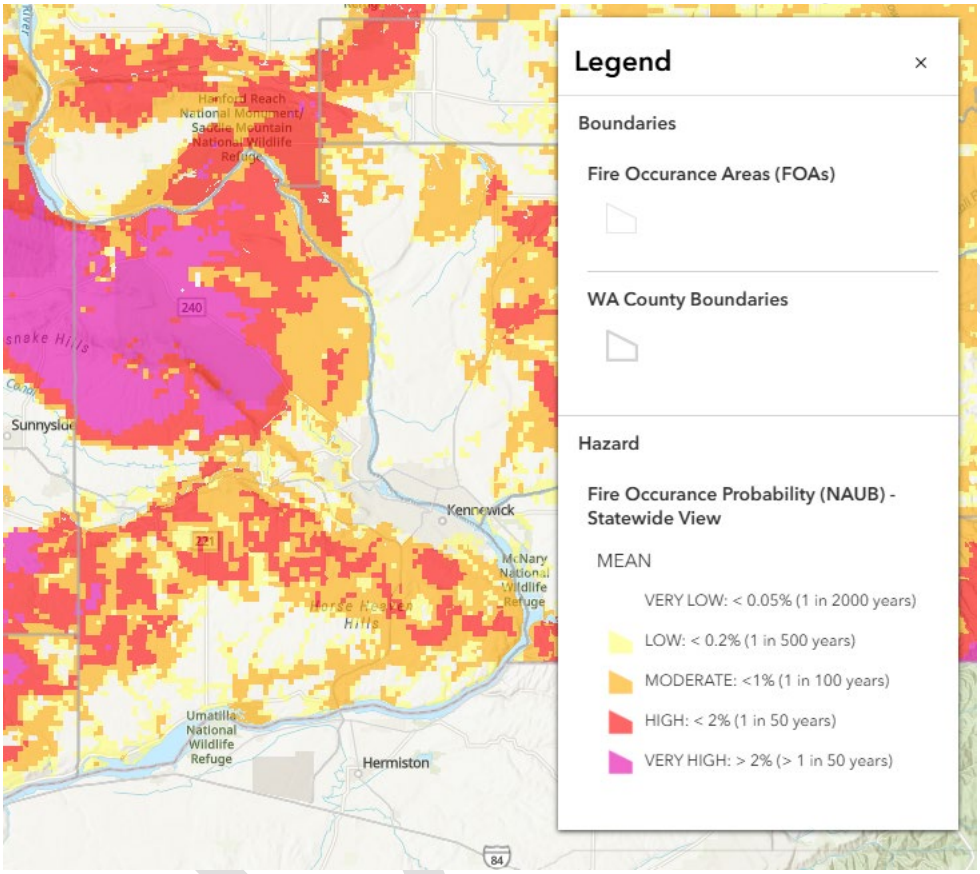
[5] Based on DNR WUI Steering Committee Notes from 9/4/25 and presentation materials at February 10th, 2026 listening session.

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Hazard & Risk Maps Next Steps

The final hazard maps are expected to be released by DNR in late spring or summer 2026. DNR staff indicated that existing available datasets from the US Forest Service "Wildfire Risk to Communities" datasets provide a good proxy for the DNR mapping products. DNR has released a preliminary? draft version of the hazard map, shown in Figure 2.

Figure 2: DRAFT DNR Wildfire Hazard of Washington Map



ESB 6120 Requirements for "High" and "Very High" Risk Areas

The new DNR Hazard Map will identify "high" and "very high" hazard areas where International WUI Code requirements are applied. Within these areas, local jurisdictions are required to apply WUI building code standards at the time of development.

The building code requirements focus on ignition-resistant construction and access for fire response, including:

- **Roofing:** Class A roof coverings (e.g., asphalt composition shingles, metal roofing, clay or concrete tile) and ember-resistant detailing at eaves

- **Exterior walls:** Noncombustible or ignition-resistant materials (e.g., fiber cement siding, stucco, masonry, fire-retardant treated wood)
- **Decks and projections:** Ignition-resistant or heavy timber materials; screening of undersides to prevent ember intrusion
- **Access and driveways for fire apparatus:** driveways are required for structures set back >150 feet from a road; turnarounds required for driveways >300 feet; turnouts and turnarounds required for long, narrow driveways (>500 feet and <20 feet wide)

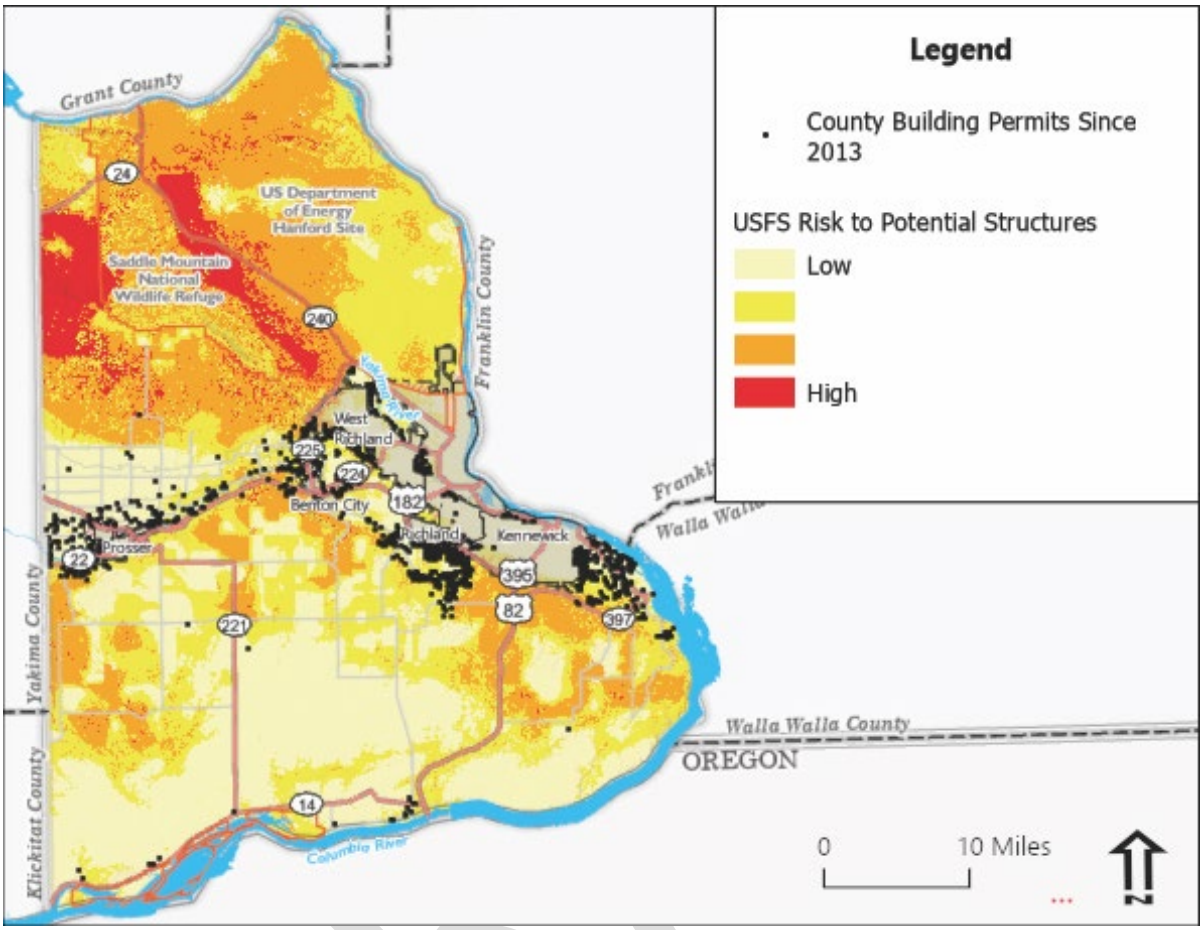
Local jurisdictions may adopt additional portions of the WUI Code, but standards may not exceed state minimum requirements. Jurisdictions may also develop local hazard and risk maps, provided they are consistent with state criteria.

Interim Hazard and Risk Data

Maps within the existing Benton County Community Wildfire Protection Plan (CWPP), as well as the U.S. Forest Service *Wildfire Risk to Communities* dataset, can be used on an interim basis until the updated DNR maps are released. The Wildfire Risk to Communities *Risk to Potential Structures* data estimates the relative risk to structures by combining **burn probability** and **fire intensity** in a similar manner to the draft DNR Hazard Map (Figure 2). The Risk to Potential Structures map is shown in Figure 3 below.

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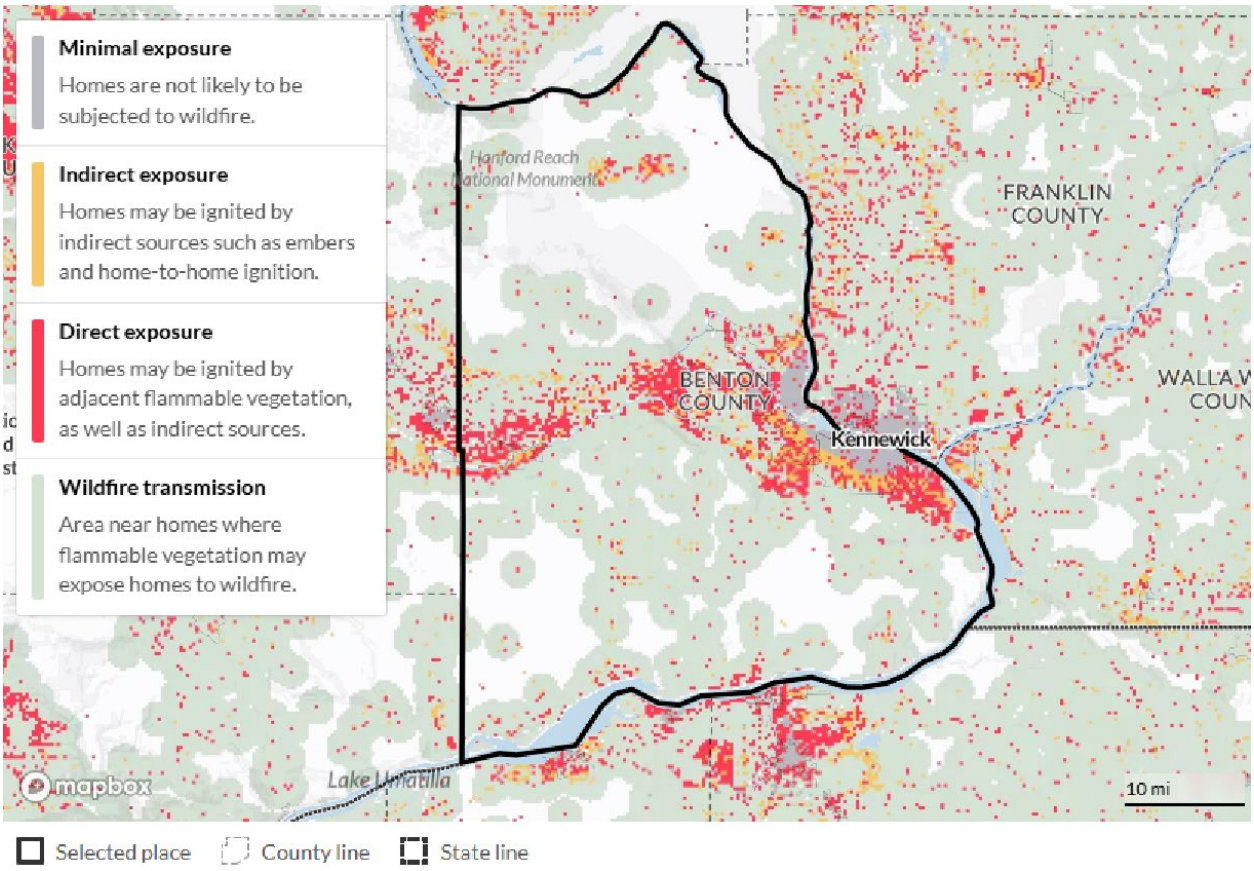
Figure 3: Wildfire Risk to Potential Structures



The U.S. Forest Service Wildfire Risk to Communities dataset also includes Risk Reduction Zones, which identifies where different types of wildfire mitigation are most effective for protecting homes based on levels of exposure. Figure 4 shows Wildfire Risk Reduction Zones for Benton County.

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Figure 4: USFS Wildfire Risk Reduction Zones for Benton County



Maps from the existing Community Wildfire Protection Plan (CWPP) (2018) also identify areas with elevated wildfire hazard. Wildfire activity has been concentrated in specific parts of the County over time, and broader threat mapping highlights areas with higher relative wildfire hazard (see Figures 5 and 6). The activity areas are located in the northwest part of the County, within the Hanford Nuclear Reservation boundary and the western county border (Rattlesnake Mountain and corridor connecting west), north of Benton City (Rattlesnake Hills), along I-82 and the Horse Heaven Hills between Prosser and Benton City, in Badger Canyon and in the southwest part of the County along SR 14 and the Columbia River.

Figure 5: Historic Fires & Acreage by Decade, CWPP pg. 34

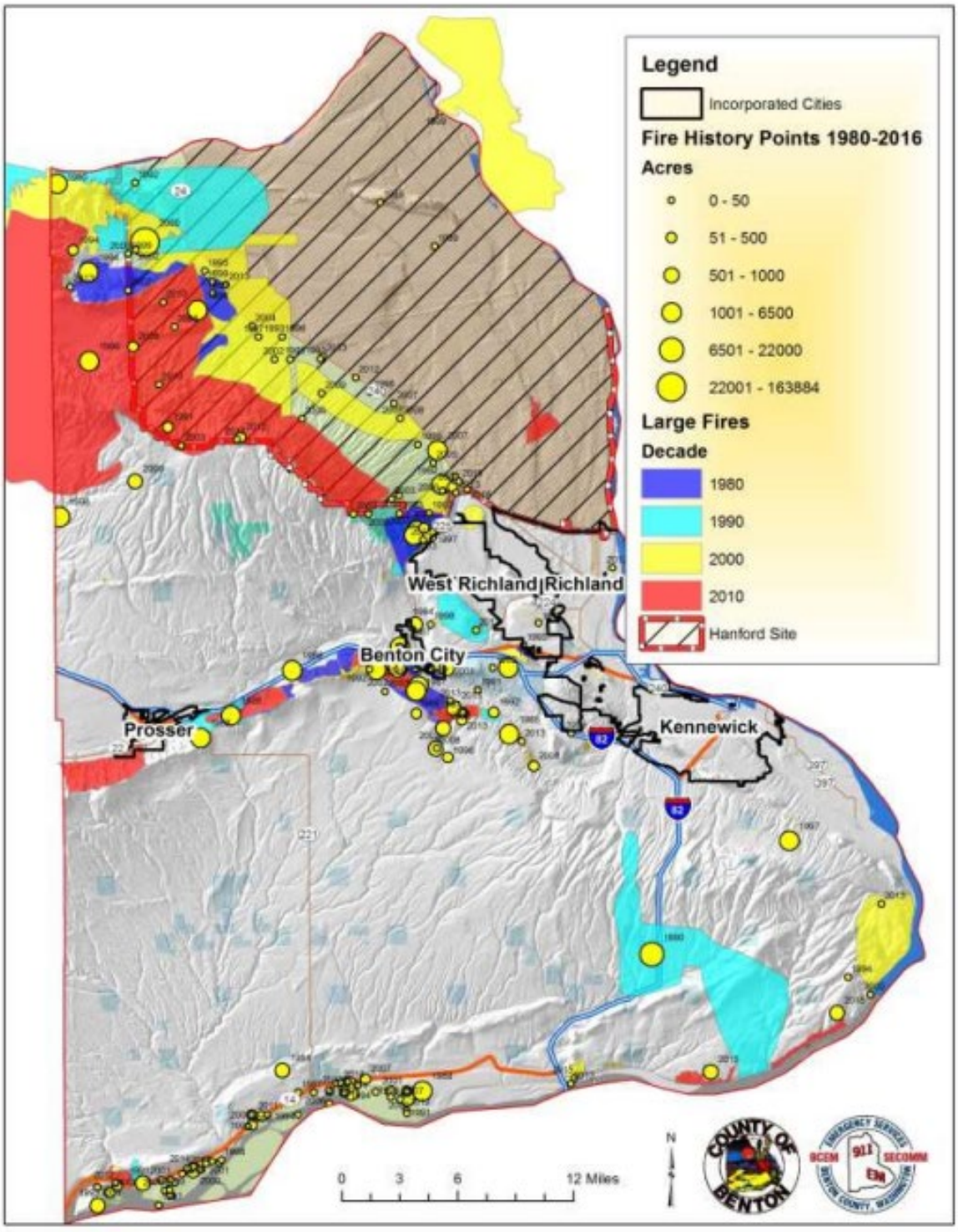
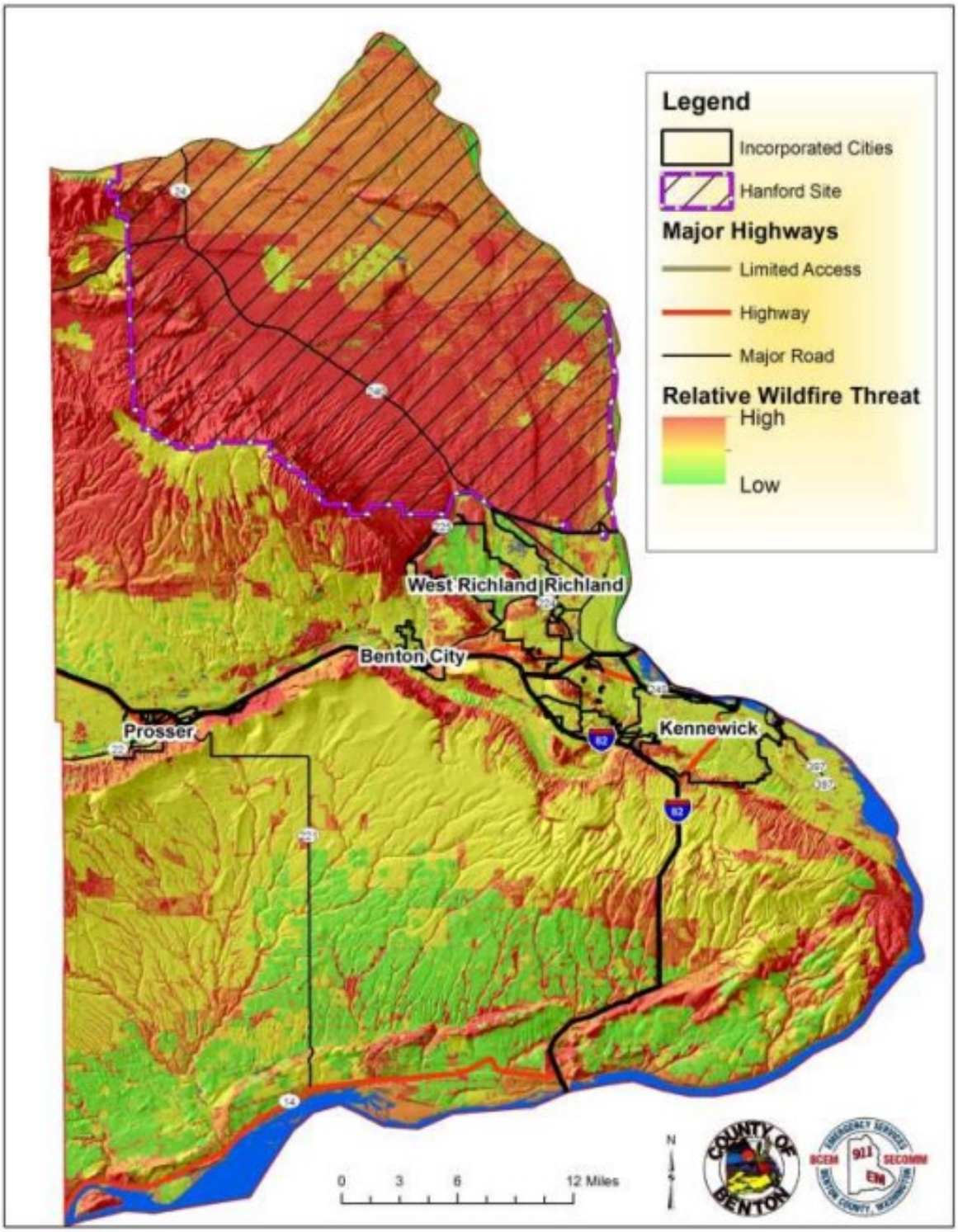


Figure 6: Relative Wildfire Threat Map, CWPP pg. 63



Recommended Comprehensive Plan Updates to Support WUI Risk Reduction Strategy

Recommended Actions:

1. **Incorporate DNR wildfire hazard and risk maps (once available) into the Comprehensive Plan map folio. Incorporate more detailed measures into land use actions in high hazard and risk areas into goals and policies where appropriate. Relevant Goals and Policies are listed below:**

   CA Goal 2, Policy 1: …establish development regulations that incorporate best practices for reducing the risk of wildfire, extreme heat, flooding, and other climate-exacerbated hazards. Potential additions:

   - *Apply best available wildfire hazard and risk mapping to inform siting, design, and prevention/mitigation requirements.*
   - *Require defensible space, fuel modification zones, and adequate emergency access for new development in High, and Very High wildfire hazard areas. Provide education and outreach to existing landowners in these areas, providing similar information on ways they can reduce fire hazards and risk.*
   - *Incorporate vegetation management standards that address invasive annual grasses and fuel continuity across arid and semi-arid landscapes, including strategies and treatments that limit the dominance and spread of invasive annual grasses in fuel breaks.*

   CA Goal 2, Policy 3: Locate and designate lands subject to natural disasters and current or future climate hazards for uses which avoid or minimize exposure of life and property to risk. Potential additions:

   - *Include mapped WUI and wildfire hazard severity areas in hazard designations*

   LU Goal 6, Policy 13: Encourage the reduction of fire risk and urban/wildland interface through fire-wise principles, prevention measures, and other programs. Potential Additions:

   - *Apply best available wildfire hazard and risk maps to prioritize areas for risk reduction*
   - *Encourage landscape-scale fuel management, including strategically located fuel breaks. Incorporate best management practices and long-term maintenance into fuel break design to manage invasive annual grasses.*

   LU Goal 6, Policy 14: Support and encourage the use and application of Firewise principles and other fire risk reduction measures consistent with the Benton County Natural Hazard Mitigation Plan and Community Wildfire Protection Plan to reduce fire risk

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for urban development, urban subdivisions, rural subdivisions and large rural developments susceptible to wildfires. Encourage the implementation of the Firewise principles, or similar best management measures, applicable to individual lots on all lots at risk from wildfires. Potential Additions:

- *Implement Firewise principles in coordination with mapped wildfire hazard areas and WUI designations*
- *Promote defensible space standards, fuel reduction treatments, and fire-resistant vegetation*
- *Recognize that fuel treatments and fuel breaks provide variable effectiveness and require ongoing maintenance.*
- *Encourage long-term vegetation strategies, such as repeated application of pre-emergent herbicides, that transition fuels toward fire-resistant perennial species and reduce invasive annual grasses*

2. Conduct targeted outreach and education for priority hazard areas consistent with the Comp. Plan, the updated DNR maps and the existing and future updated CWPP.

The CWPP identifies the Rattlesnake Hills and Rattlesnake Mountain, Horse Heaven foothills, and areas the Yakima River corridor as areas with moderate to high wildfire risk. Higher hazard is associated with steeper slopes, south-facing aspects, and drainages, as well as areas exposed to prevailing southwest to northeast winds that can drive fire spread. Targeted outreach should focus on these priority areas with higher hazard based on the Wildfire Risk to Communities *Risk to Potential Structures* data is shown in Figure 7 below. Educational information should be continued to be shared in the following ways:

a. Direct mailers to landowners in priority areas
b. At the building and planning counter
c. With building permit application packets
d. On the Benton County website

Materials may include:

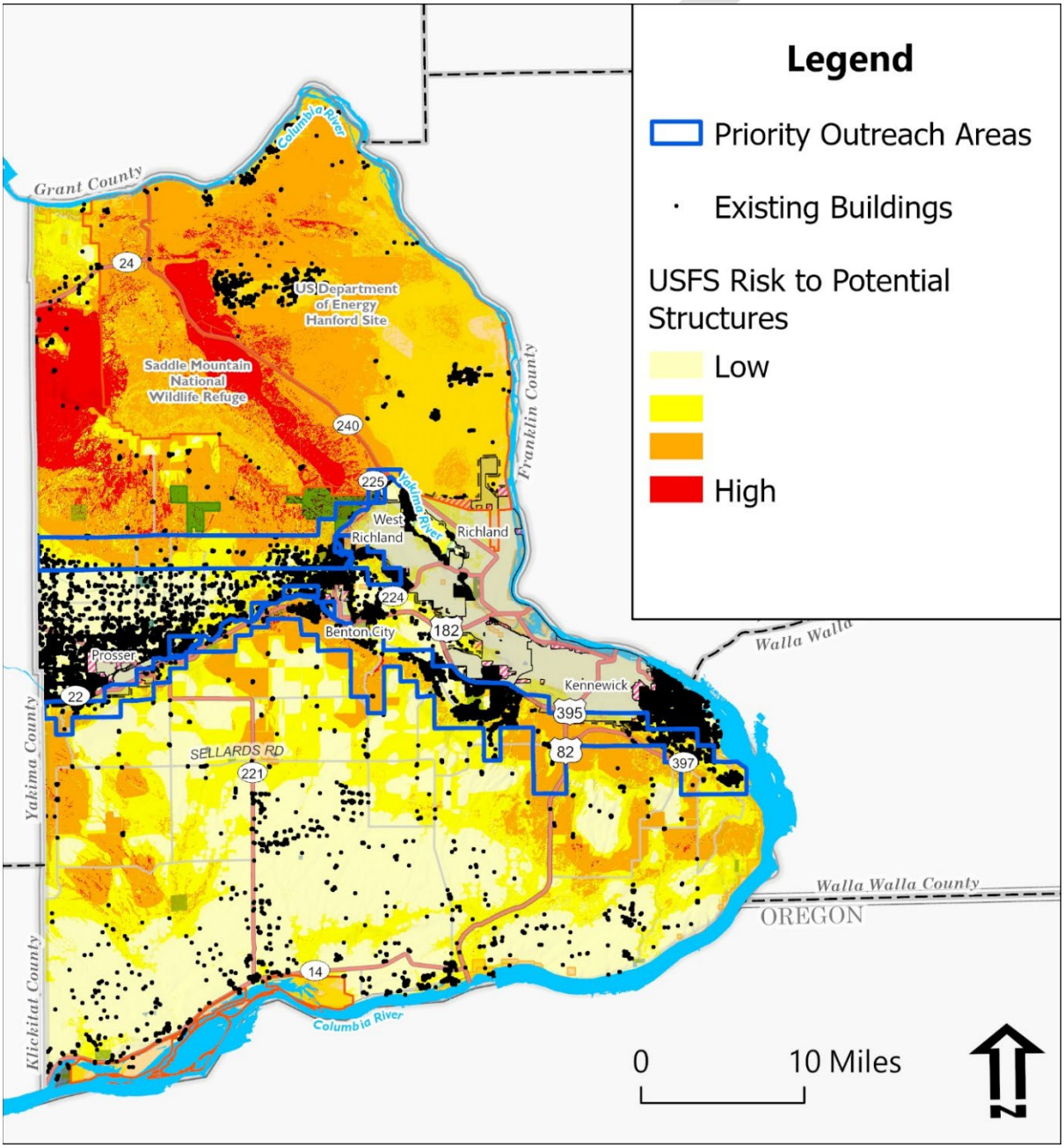
- 1 page Firewise pamphlet titled "How to Prepare Your Home for Wildfires"
- Firewise guide to completing the Firewise USA Community Risk Assessment
- 1 page Community Planning Assistance for Wildfire *Own Your Zone* Pamphlet
- Ready, Set, Go Wildfire Preparedness for Farmers and Ranchers Resource (available in English and Spanish)
- Ready, Set, Go, Resource for the Seasonal Resident and Property Owner
- DNR Fire Resistant Plants for Eastern Washington

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Additional Online Resources are available at:

- DNR Wildfire Resilience Resource Library
- International Association of Fire Chiefs Ready, Set, Go! Site
- Community Planning Assistance for Wildfire Website
- Firewise USA Program Website
- Fire Adapted Communities Learning Network Website
- Washington DOH Wildfire Smoke Online Resources

Figure 7: Priority Outreach & Education Areas



3. Additional Measures and Management Considerations from Fire Chiefs

As part of the 2018 Comprehensive Plan update, several fire chiefs were interviewed and key related findings still applicable are summarized in the following, framed as potential actions the County could support:

- Increased vegetation management along transportation corridors (Interstate and State highways), addressing roadside vegetation, particularly cheatgrass and other invasive species, that can contribute to frequent ignitions and rapid fire spread. Benton County Public Works could review maintenance procedures and determine if revised approaches might be more beneficial.

- Improved vegetation management in rural residential areas: Widespread lack of defensible space and unmanaged vegetation on large rural parcels creates continuous fuel conditions and increases structure vulnerability. Support education and outreach that encourages landowners in these areas to conduct fuel reduction efforts, while also preserving habitat values.

- Support efforts that improve the effectiveness of firebreak strategies to reduce rapid fire spread in rural areas, including CRP lands (Note: see discussion below on factoring in habitat values into firebreak strategies).

- Support new or improved water supply for fire suppression in rural areas constrained by response capability and increased risk.

- Support enhanced communications capability in areas with poor radio communication due to topography can hinder coordinated wildfire response.

4. Managing Hazards and Risks While Considering Shrubsteppe Habitat Values

A common method for addressing fire risk is to mechanically establish fire breaks through intensive tilling to reduce the likelihood of fires spreading across the landscape. There are pros and cons to establishing fire breaks compared to other methods when considering management strategies, as illustrated by findings from two U.S. Geological Survey (USGS) studies. This information is provided for considerations in future fire risk management actions, updates to the CWPP and for County right of way maintenance actions, in cooperation with its partner agencies.

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The USGS evaluated alternate ways to intensive tilling to reduce shrub and grass wildfire risk, considering methods such as mowing or cutting, along with planting additional fire-resistant perennial bunchgrasses through drill seeding to create a fuel break, which tends to promote more invasive grasses and weeds such as cheatgrass and Russian Thistle (tumbleweeds). In heavily invaded exotic annual grass areas, there wasn't much difference between the methods in reducing fire risk but in less invaded shrubland fire risk could be moderated, particularly where treatment induced shifts from shrub to herbaceous fuel dominance occurs. https://www.usgs.gov/publications/vegetation-fuels-and-fire-behavior-responses-linear-fuel-break-treatments-and-around (accessed March 18, 2026)

The USGS also looked at fuel breaks and their ecological and habitat impacts (benefits and risks). There may be some instances when fuel break impacts may outweigh benefits, as these breaks can promote invasive species and degrade habitat. The researchers evaluated data on fuel break location and ecological data, considering burn probability, fuel break effectiveness, invasive annual grass cover and locations of habitat to characterize trade-offs.

Researchers found that fuel breaks were generally located in areas of high burn probability and were often spatially associated with areas of high invasive grass cover, and low fuel break predicted effectiveness. Dense fuel break networks within priority wildlife areas could potentially intercept more wildfires and reduce wildfire spread, but also could fragmenting and degrading critical wildlife habitat. Land managers should consider pros and cons of fuel breaks including ecosystem conservation impacts.

https://www.usgs.gov/centers/fort-collins-science-center/news/ecological-benefits-and-risks-fuel-breaks-vary-across . (accessed March 18, 2026)

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Appendix P
Major Industrial Development Site Suitability Memorandum

Draft Memorandum

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

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

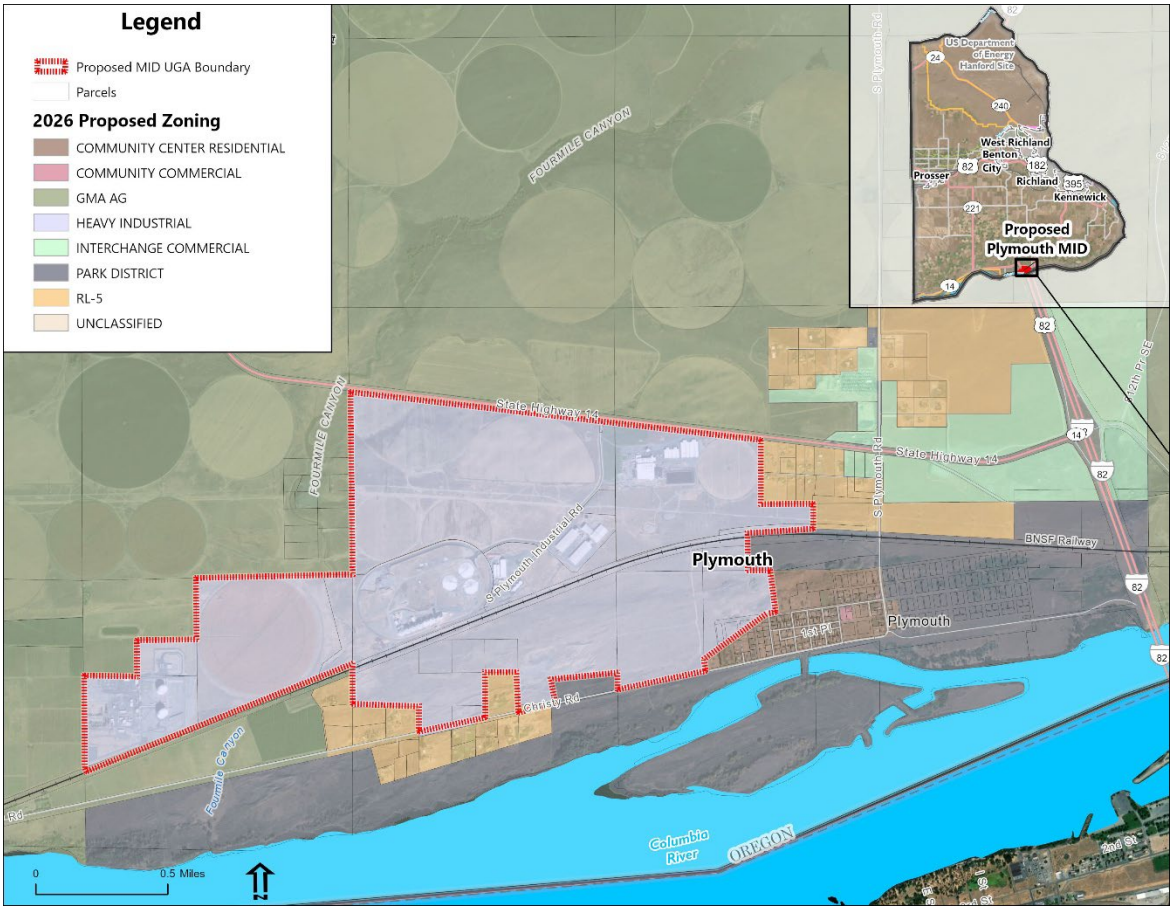
Date: September 9, 2026

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

Purpose

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

Figure 1: Proposed Plymouth MID Area

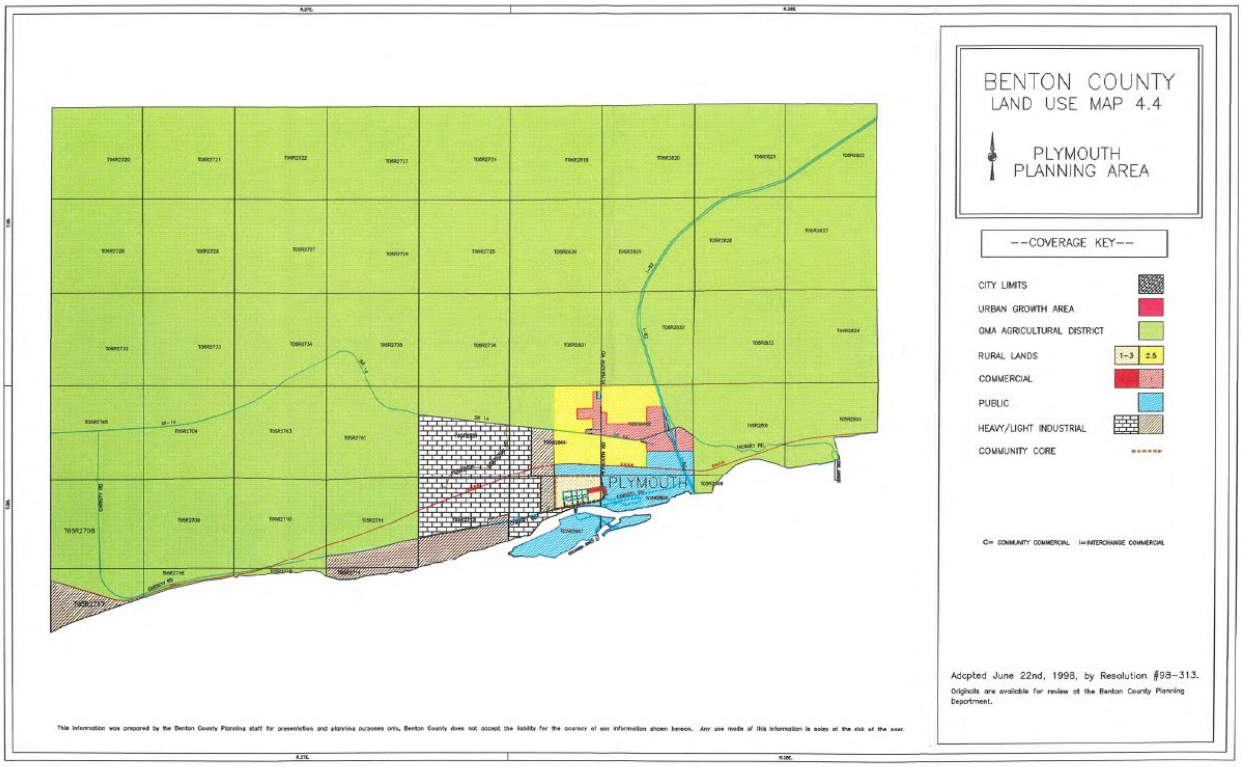


The Industrial Lands Inventory Memorandum evaluated the overall supply and distribution of industrially designated lands within Benton County and the broader region and led to the MID identification for Plymouth and adding more industrial lands (with some removals as well) in this part of the County.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

Site Background

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

Figure 2: Plymouth Land Use Map from 1998 Comprehensive Plan



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

MID Designation Criteria

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

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

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

Site Comparison to Existing UGA Industrial Lands

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

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

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

Figure 3: Industrial Development Site Suitability Analysis Sites

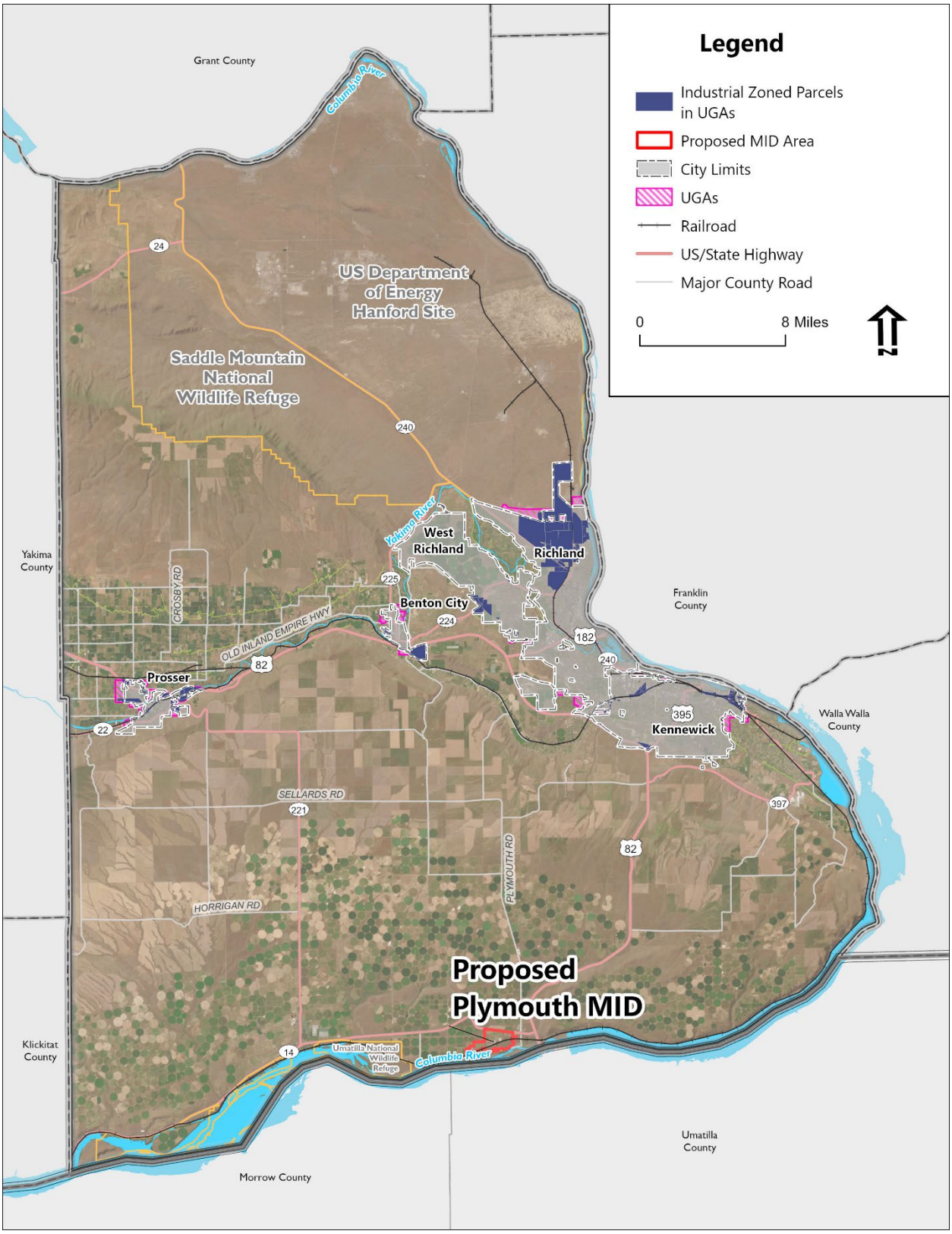


Table 1: MID Industrial Lands Comparison Summary

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

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

Notes:

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

Summary of Analysis Findings

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

Richland

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

Kennewick

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

West Richland

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

Benton City

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

Prosser

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

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

Other MID Approval Criteria

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

a) **New infrastructure is provided for and/or applicable impact fees are paid.**
   Response: Necessary transportation, rail, utility, and site infrastructure will continue to be provided as development occurs, funded primarily by Ag Reserves, and applicable impact fees would be paid, if required.

b) **Transit-oriented site planning and traffic demand management programs are implemented.**
   Response: Site planning will incorporate transportation demand management measures appropriate to the location and workforce, including ridesharing, vanpooling, or similar strategies.

c) **Buffers are provided between the major industrial development and adjacent nonurban areas.**
   Response: Appropriate setbacks, landscaping, or other buffers will be required where industrial development adjoins nonurban lands. Existing agriculture and open space lands largely surround the MID.

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

e) **Development regulations are established to ensure that urban growth will not occur in adjacent nonurban areas.**
   Response: Designation of the MID boundary will confine development to the designated MID site and prevent expansion into surrounding rural and agricultural lands. The County is introducing language into the comprehensive plan and development regulations to clarify that the existing rural industrial land use designation and corresponding Heavy and Light Industrial zones located in other parts of the County cannot be further expanded in the County rural areas.

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

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

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

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

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

APPENDIX A:

ANALYSIS AREA MAPS & INVENTORY TABLE

Figure A- 1: Richland Industrial Lands

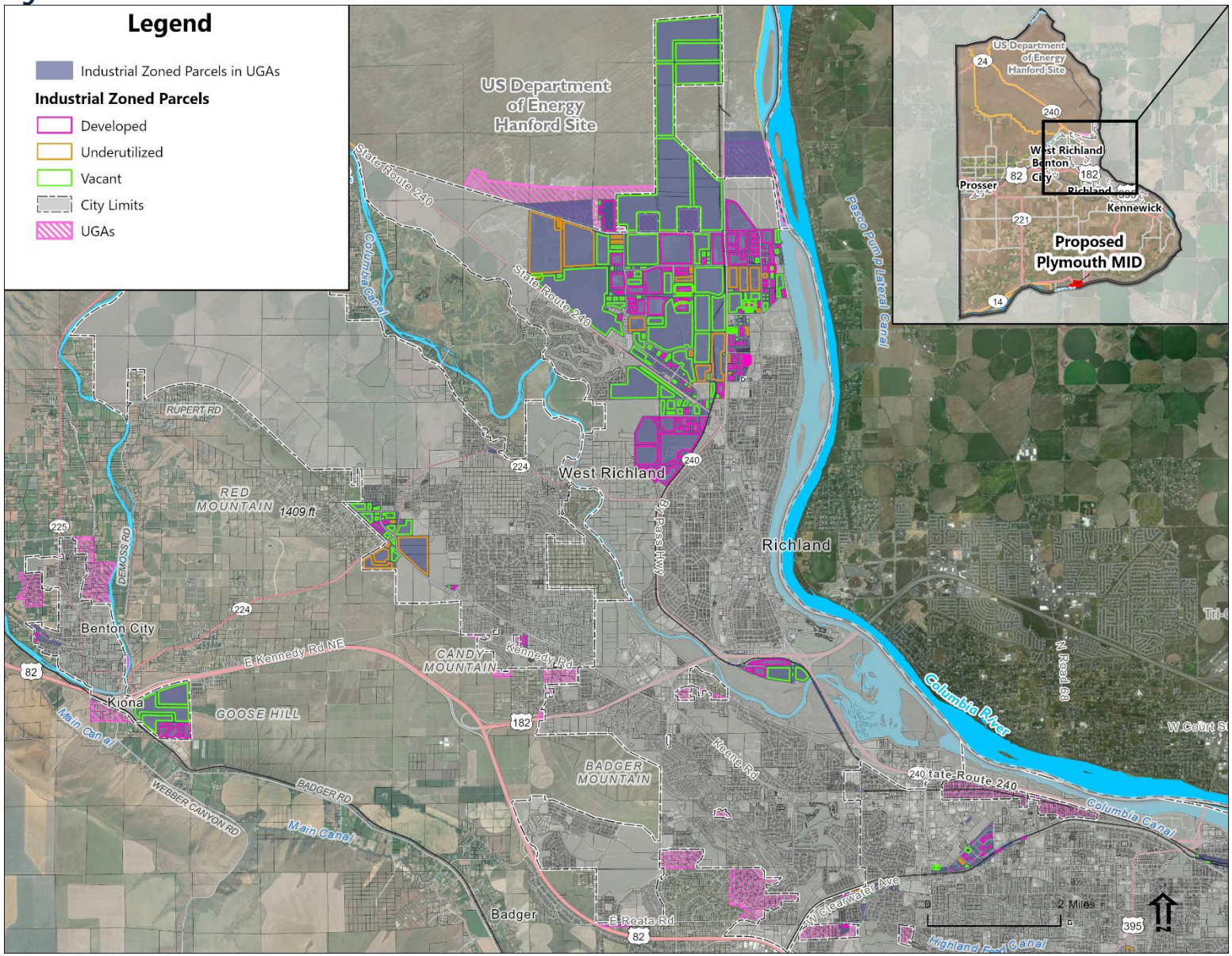


Figure A- 2: Kennewick Industrial Lands

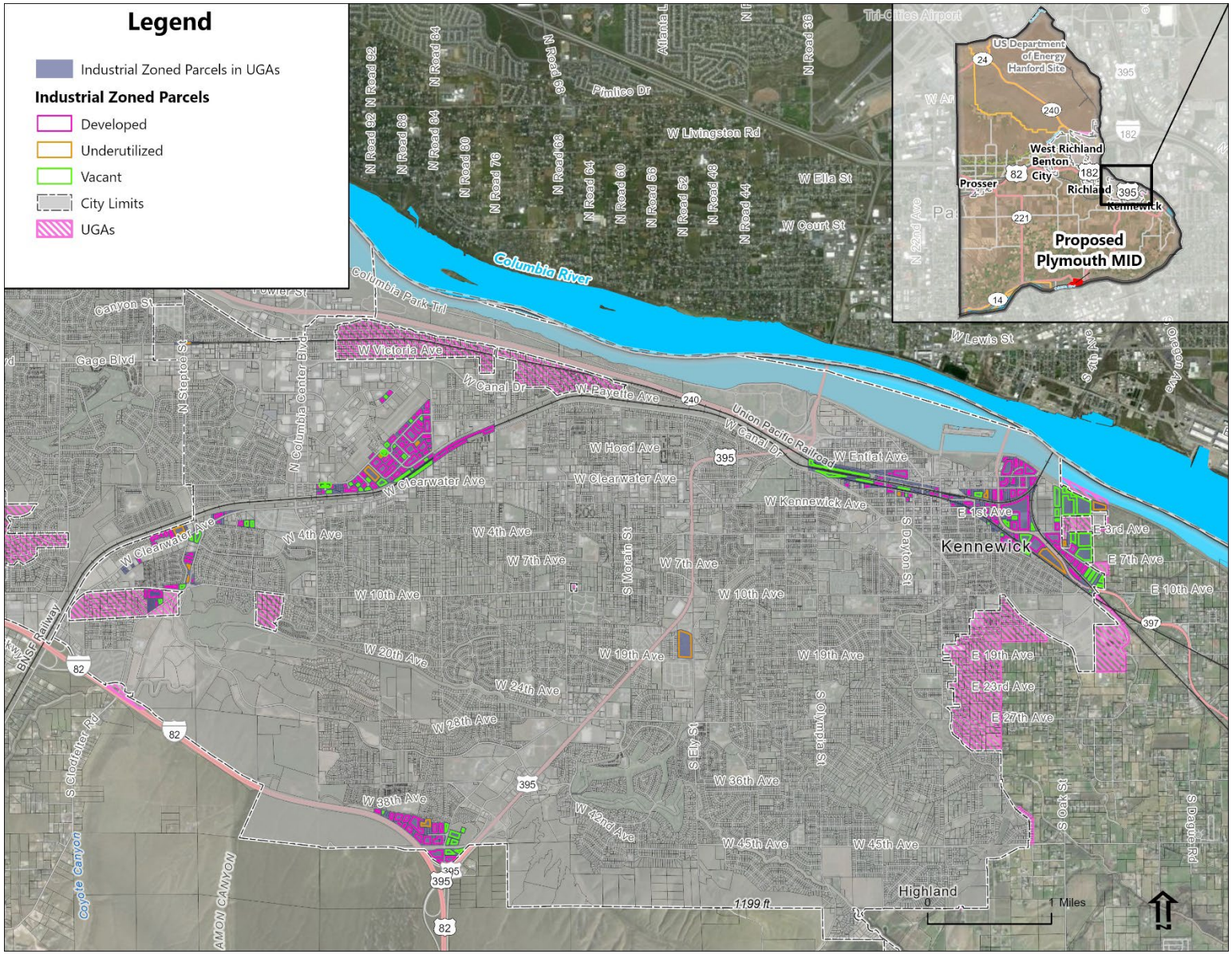


Figure A- 3: West Richland Industrial Lands

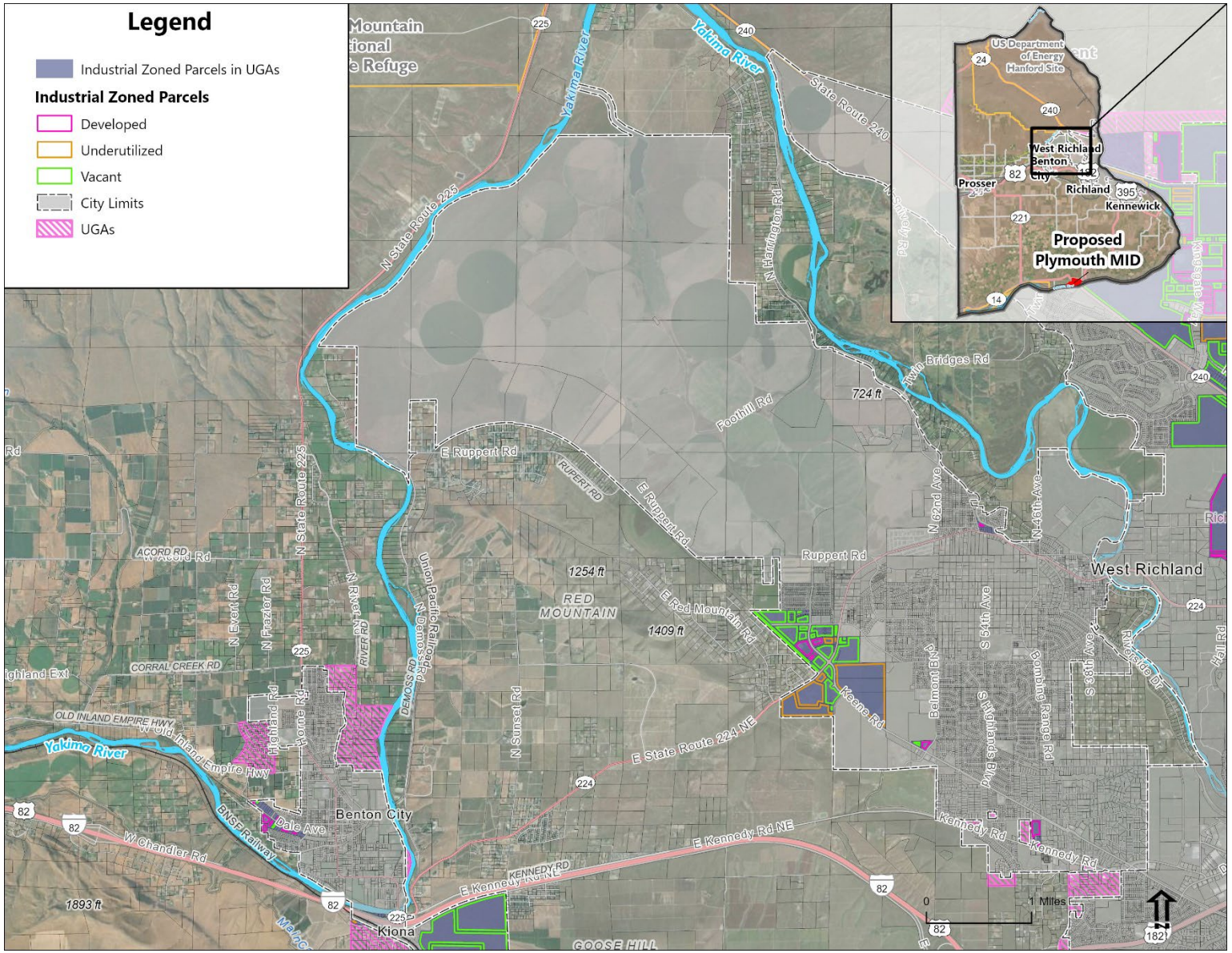


Figure A- 4: Benton City Industrial Lands

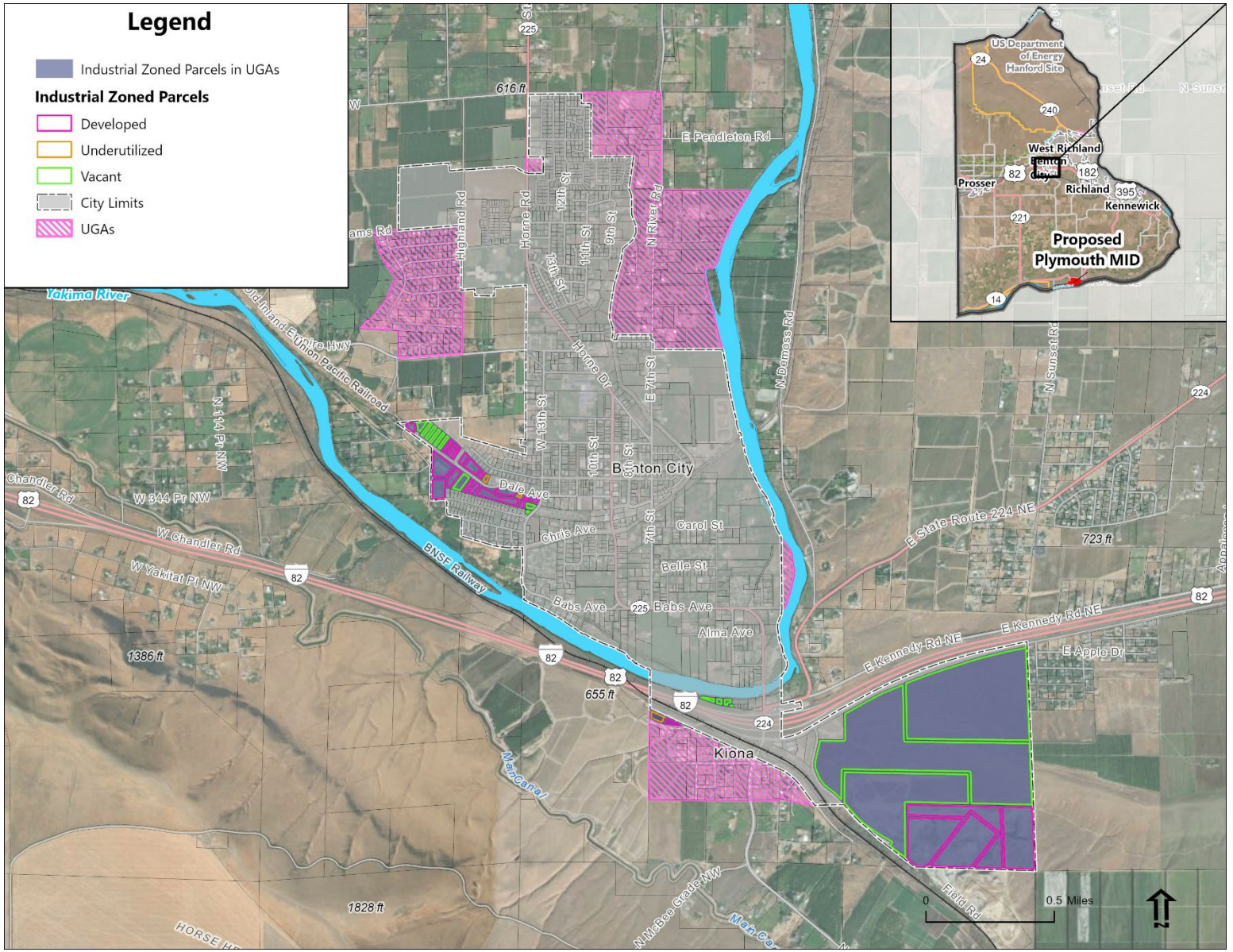


Figure A- 5: Prosser Industrial Lands

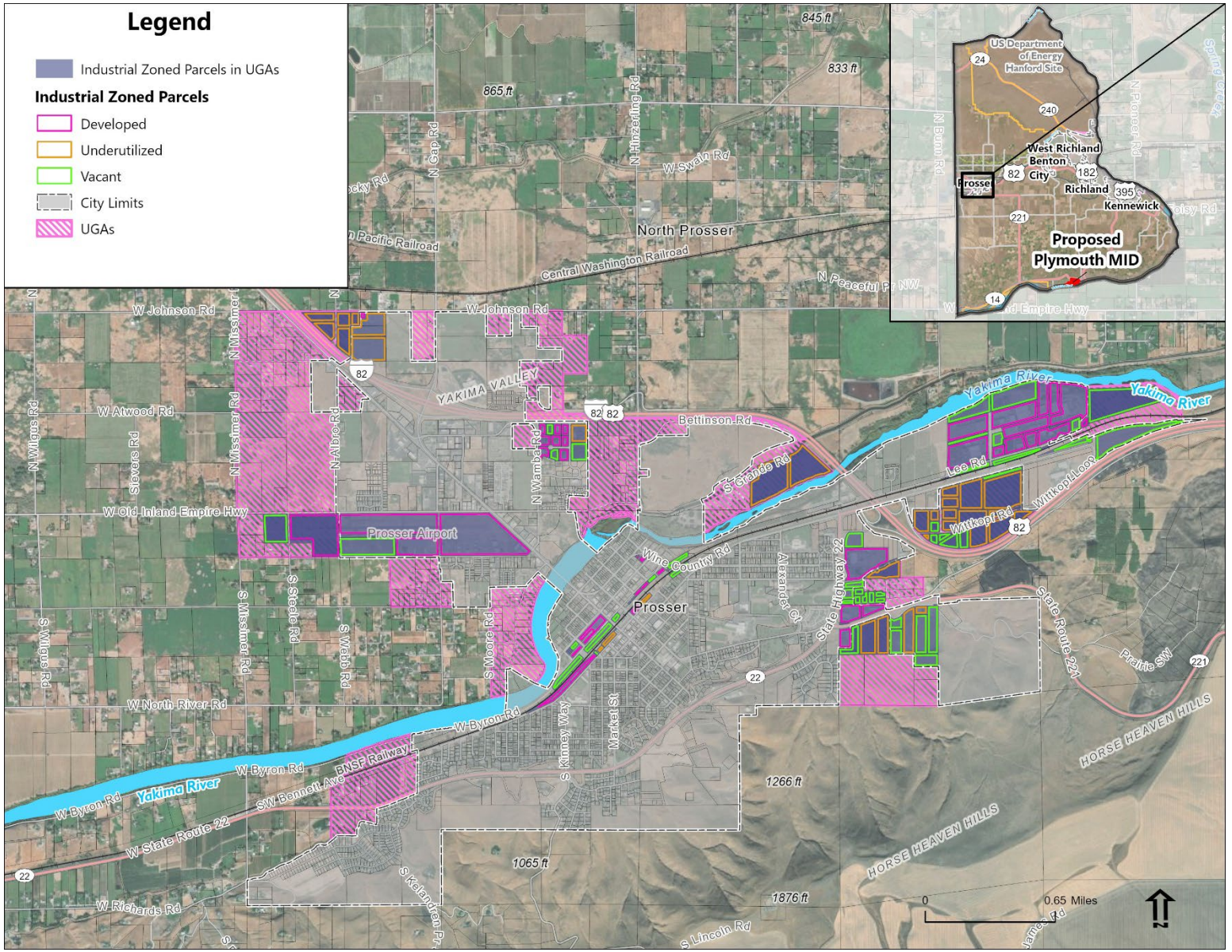


Table A-1: Largest 3 Industrial Land Ownership Areas by Jurisdiction

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

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

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

Appendix Q
Urban Growth Area Proposals Review

WHITE BLUFFS CONSULTING

1651 South Fescue Street
Kennewick, Washington 99338
Phone 509.539.3366
www.whitebluffsconsulting.com

MEMORANDUM

To:	Greg Wendt and Damien Hooper, Benton County Community Development	**Date:**	September 24, 2026
From:	Ben Floyd, White Bluffs Consulting and Adam Cares, AC Geo	**Project:**	Comprehensive Plan Update
cc:			
Re:	Urban Growth Area Proposals Review – Benton City and Richland within the County Context		

This memorandum includes findings from an evaluation of the Benton City and City of Richland UGA boundary change applications, and incorporates relevant draft population, land capacity and contextual information received from the cities and their planning documents. The County expects the record for each city's legislative action will show, upon final adoption, how each city approached the requirements for producing housing analyses and land-capacity analyses. For this analysis, draft planning documents were used in evaluating the UGA applications within the larger County context.

Summary Analysis and Findings

White Bluffs Consulting has reviewed the proposed revisions to the Benton City and City of Richland UGA boundaries, together with measures of capacity among the cities/UGAs in the County, and finds the revisions are needed and necessary to accommodate the urban growth projected for the 20-year planning period. In reaching this determination, the evaluation considered the following for each jurisdiction:

- land capacity
- population projections
- housing allocations
- existing and planned infrastructure
- utility availability
- transportation facilities
- environmental constraints, and
- the ability to provide public facilities and services during the planning horizon.

The evaluation also considered the GMA's new climate-planning requirements, including the relationship between UGA location, transportation access, vehicle miles traveled, and

greenhouse gas emissions. The following sections summarize the Benton City and Richland proposals before presenting the supporting countywide and city-specific analysis.

Benton City UGA Application Summary

Benton City proposes adding approximately 54.65 acres to its UGA, including:

1. A 33.61-acre infill area within the central portion of the city.
2. An approximately 17.51-acre area southwest of the city consisting of WDFW-owned property and Kiona Irrigation District right-of-way that would remain largely undeveloped.
3. Approximately 3.53 acres of additional residential development area.

The City is providing urban services, including water, sewer, roadway access, and park maintenance, to portions of the WDFW property despite its current location outside the UGA. Bringing this area into the UGA would align service responsibilities with jurisdictional boundaries.

Portions of Benton City's existing UGA consist of a fully developed manufactured-home park with limited redevelopment potential. This area contributes little additional growth capacity but remains within the UGA because future utility service obligations may still arise if existing systems fail.

The City's analysis concludes that the proposed expansion is necessary to meet its 20-year population and housing allocations. Utilities and major roadway facilities already serve, or are immediately adjacent to, the proposed expansion areas and can be extended through existing service arrangements where necessary. (*See Benton City's UGA proposal received January 28, 2026 for additional detail (Attachment A)*.

City of Richland UGA Application Summary

Richland proposes removing approximately 140 acres of permanently preserved open space on Badger Mountain from the UGA and adding approximately 444 acres in several locations, producing a net UGA increase of 304 acres. Stating the gross additions, removal, and net change separately clarifies the acreage summarized below.

The City proposes adding lands that:

- Are already planned to develop at urban densities.
- Include approximately 190 acres currently designated Rural Remote that would be incorporated as recreation land without residential development.

- Include approximately 254 acres currently designated Rural Transition that is intended for urban residential development consistent with surrounding development patterns and a future school complex previously counted as development capacity.

The proposal partially offsets growth that otherwise could occur in the unincorporated County and directs that growth into areas served by urban infrastructure. The City's analysis demonstrates that these lands are needed to accommodate allocated population growth and housing needs through the planning period. The analysis further demonstrates that utilities and major arterial roadways are already available to serve the proposed expansion areas. (*See Richland's UGA proposal received November 26, 2025 for additional detail (Attachment B)*.

Rationale Summary

Table 1 summarizes each proposed UGA change, identifies its acreage, and states the principal planning rationale. It distinguishes gross additions and removals from each jurisdiction's net acreage change.

Table 1 – Net Acreage Changes

UGA Changes	Acres	Rationale
Benton City		
- Residential	+ 37.14	Provides acreage for infill housing needed to meet housing allocation in an area near existing utilities and city services. Provides ability to serve localized housing need would save VMT vs. available lands in other areas such as West Richland.
- Parks/Open Space	+17.51	Site has existing urban services, including water, sewer, roadway access, and park maintenance.
Subtotal	+54.65	

Richland		
- Harvest Ridge / Harvest Ridge Addition	+174	Harvest Ridge (53 acres) and addition (121 acres) provide compatible housing infill; proximity to school site, services, and jobs supports reduced VMT.
- Future KSD School Location	+80	Large-scale school site serving planned urban growth; adjacent housing and available utilities/arterials support coordinated services and shorter school trips.
- Recreation	+190	Large scale recreation facility site near housing and Richland/Kennewick job centers; existing freeway access and planned multimodal improvements; shorter local trips and reduced out-of-region travel.
- Open Space	-140	Protected open space removed from UGA;
Subtotal	+304	**270 acres (60.8% of UGA additions are** for school/recreation facilities with unique siting considerations; remaining 174 acres for housing near facilities and area jobs.
TOTAL	**+358.65**	

General Considerations: Capacity and Housing Targets

Each jurisdiction has worked during the past two years to update its comprehensive plan and development regulations. The cities and County have also developed climate elements through a regionally coordinated process. Each jurisdiction's update must be consistent with the Countywide Planning Policies, as updated by Resolution 2026-111 and Ordinance No. 664, dated February 24, 2026.

Table 2 shows the population projection for the total County and for each jurisdiction. The County is expected to increase in total by more than 71,000 through 2046, with city populations increasing approximately 1,500 to 25,000.

Table 2 - Population Growth through 2046 in Benton County

Jurisdiction	2020 Population	2046 Population	Population Growth (2020-2046)
Benton City	3,479	4,985	1,506
Kennewick	83,921	108,989	25,068
Prosser	6,062	8,292	2,230
Richland	60,560	82,448	21,888
West Richland	16,295	26,387	10,092
Unincorporated	36,556	47,355	10,799
Total	**206,873**	**278,456**	**71,583**

Source: BERK, 2025 based on Commerce HAPT.

When considering capacity for planned growth, WAC 365-196-310(5)(d)(iv) directs jurisdictions to first consider increasing capacity within existing urban areas before expanding UGAs. The WAC states:

> *(iv) If future growth forecasts exceed the current combined capacities of unincorporated county and city lands, counties and cities should first consider the potential of increasing capacity of existing urban areas through allowances for higher densities, or for additional provisions to encourage redevelopment. If counties and cities find that increasing the capacity of existing urban areas is not feasible or appropriate based on the evidence they examine, counties and cities may consider expansion of the urban growth area to meet the future growth forecast.*

Review of cities' code revisions and planning documents indicate this is occurring:

- Kennewick is a Tier I city for Middle Housing requirements and adopted code revisions to implement HB 1110 in mid-2025, which increased development capacity within the city.
- Richland is a Tier II city and is processing code revisions similar to Kennewick and additional upzones designed to increase residential capacity, which are expected to be adopted by the end of 2026.
- Benton City, Prosser and West Richland are planning for various measures in their draft plan and code updates to increase capacity within existing urban areas.

City-Specific Housing Considerations

Benton City

Benton City needs to add 765 housing units and 3 emergency housing beds by 2046. The application from Benton City (see Attachment A) addresses land capacity using the uniform calculation set out by Benton County. The November 2025 land capacity analysis provided in the application indicates the city needs an additional approximate 142[1] acres of residential land to support their population growth projection (including land to support the city's assigned housing allocation), with approximately 87 acres vacant or underutilized within the City, and the rest (55 acres) located in the modified UGA (including the 37 acres of residential land that would be added per the city application).

Kennewick

Kennewick needs to add 12,626 housing units and 57 emergency housing beds to meet its assigned housing targets. A 2025 Land Capacity Analysis prepared by BERK Associates identified an overall surplus of approximately 12,523 housing units, including approximately 812 units attributed to capacity within the unincorporated UGA[2]. The analysis also identified a deficit in the lowest housing-income bands. After applying a residential buildout factor of 70 percent, 25 percent market factor and excluding non-buildable lands, Kennewick has a net UGA supply of 1456 acres.

Since completion of that analysis, the City has prepared additional zoning and development-code amendments intended to address those deficiencies; the approach is to implement tools intended to address lower-income housing needs. Draft Version 3 of the City's Comprehensive Plan (August 2026)[3] reports that overall housing capacity has increased further, showing an estimated surplus of 12,916 housing units to cover the projected need.

Prosser

Prosser needs to add 765 housing units and 5 emergency housing beds by 2046. At its April 16, 2026 Planning Commission meeting[4], the City's consultant Nexus reported that existing zoning produced an estimated capacity surplus of approximately 920 housing units[5].

[1] 116 acres multiplied by 22% market factor (25% - 3% for critical areas credit)
[2] Available at https://www.go2kennewick.com/DocumentCenter/View/17127
[3] Available at https://www.go2kennewick.com/DocumentCenter/View/17551
[4] Available at https://cityofprosser.civicweb.net/document/182496
[5] This figure was much higher than what was presented to the city council on August 12, 2025 regarding initial LCA analysis findings, which indicated a capacity surplus of 221 homes. Available at https://cityofprosser.civicweb.net/document/178011

However, the analysis also found a deficit in housing capacity serving households between 0 and 50 percent of area median income. Proposed housing-element strategies, including a new Middle Housing zone and related code amendments, are intended to address that deficiency.

Richland

Richland needs to add 14,155 new housing units and 52 emergency housing beds by 2046 to meet its targets. The Housing Land Capacity Analysis recently prepared by AHBL updated a precursory assessment from 2025. The new analysis affirms that with proposed zoning map changes, the city can meet the allocation for all income bands from 0% to 100% AMI. There is also a modest capacity surplus of 360 housing units. (The application from Richland also addresses land capacity, using the uniform calculation set out by Benton County).

West Richland

West Richland needs to add 4,975 new housing units and 19 emergency housing beds by 2046 to meet its targets. Within West Richland is the undeveloped 7,600-acre Lewis & Clark Ranch, which was annexed into the city in 1981 and is planned for transition from agricultural to urban uses over at least the next 50 to 100 years (City of West Richland Lewis and Clark Ranch Subarea Plan & Planned Action, Final EIS April 2026). The preferred alternative in the EIS estimated 3,795 new housing units (770 acres) for the subarea, with the remaining housing needs to be met with other vacant or underutilized areas within the city. The City has significant acreage capacity to meet their projected housing needs, as discussed in more detail below.

Unique Considerations for West Richland

As described in the current City of West Richland Comprehensive Plan (2017): The City of West Richland is unique in that the physical size of the city limits greatly exceeds that which is necessary to support the population as about half of the city, by size, is currently used for agricultural production and does not include urban services.

As this land was annexed pre-GMA and only a portion of it is planned for development over the next 20-years (Phase 1 of the EIS preferred alternative), the remaining part of the Subarea is noted but excluded from the County-wide evaluation as the development horizon for the extends decades beyond the 20-year planning period. The excluded area continues to function in many respects as a long-term urban reserve because substantial utility extensions, infrastructure investments, and service expansion are still required before significant development can occur.

West Richland's extensive undeveloped acreage contributes to the overall land supply but creates an anomaly in the countywide assessment because its availability does not address the localized housing and associated needs in other jurisdictions, or represent capacity that can be served and developed within the planning period. Countywide capacity was therefore evaluated alongside location-specific needs, including existing development patterns, infrastructure availability and planned investments, proximity to jobs and services, and each city's assigned housing targets and housing needs by income level.

Additional Findings

Additional factors were reviewed in conducting this evaluation including potential impacts to agriculture and rural lands, critical areas, suitability for urban growth, housing for all income bands, transportation system improvements and other capital plans and greenhouse gas emissions. Relationships to existing UGA boundaries were also considered. These results include:

- The areas proposed for UGA modifications include County-designated Rural Remote (RL-5), Rural Transition (RL-1) and Parks land, and does not include agricultural or other resource lands that would adversely impact the rural character of the County or promote urban sprawl. Providing the proposed Richland recreation facilities at the Dallas Road location reduces pressure to expand residential development farther west into undeveloped or agricultural areas. UGA Addition B (Harvest Ridge) is adjacent to lands already urban in character and can be served by adequate public facilities, including the adjacent school site (UGA Addition D).
- The areas proposed for the Richland UGA modifications include removal of critical area (shrubsteppe habitat) already protected as open space (Badger Mountain) and that would remain permanently protected as open space.
- All areas included in the Richland UGA modification are previously disturbed lands without mapped critical areas.
- The County-park designated lands in Benton City that would come into the City UGA also as park land do contain frequently flooded areas, riparian management zone and riparian wetlands, but this land would remain as open space and undeveloped with critical areas preserved and protected.

- All the areas proposed for UGA expansion are suitable for urban growth, as detailed in the respective UGA proposals.

- The proposed Richland UGA additions provide areas capable of supporting housing affordable to households between 80 and 100 percent AMI as well as public facilities needed to serve future population growth. Benton City needs the UGA areas, particularly in the 33-acre infill area to support its housing needs allocation.

- The County's Transportation element and Capital Facilities Plan address the County roads in these areas. The County will be making multi-modal improvements to Dallas Road and has established maintenance plans other existing roads. The Capital Facilities element covers the Kennewick School District new school (future) and associated facilities which are part of the Richland proposal. The Capital Facilities element also incorporates by reference both cities' capital improvements plans for water and sewer utilities, and transportation improvements. The UGA proposals also characterize and detail how capital facilities are available to serve these areas.

- For Greenhouse Gas Emissions (GHGs), establishing a regional park facility as proposed as part of the Richland UGA proposal would reduce GHGs, compared to other locations as the Dallas Road location is more central to the largest County population and employment center (Kennewick/Richland) than other areas, such as western West Richland UGA or North Richland UGA, with direct access from I-82 and I-182, reducing vehicle miles traveled. Vehicles traveling from Benton City, West Richland or Prosser on the freeway system can easily access Dallas Road directly off the freeway system. Additionally, the existing regional transportation network already serves this area for the regional Badger Mountain trails system, and multi-modal improvements are planned. Locating tournaments and events locally would also reduce vehicle miles traveled currently associated with travel to facilities in other regions.

  For Benton City, the larger centralized area in the UGA proposal allows for infill in an area surrounded by city limits close to services, utilities and transportation and transit facilities, which should also help to reduce GHGs as this area develops over time.

- The proposed UGA areas are contiguous, fill gaps in existing boundaries, make the UGA boundaries clearer and more consistent, and will not increase pressure to urbanize rural or natural-resource lands.
- Portions of Benton City's existing UGA consist of a fully developed manufactured-home park with limited redevelopment potential. This area contributes little additional growth capacity but remains within the UGA because future utility service obligations may still arise if existing systems fail.
- Certain lands currently located within Benton City's UGA may not be made available for development in the foreseeable future as potential cultural-resource constraints may further limit development potential, raising questions regarding the practical availability of a portion of the City's existing land supply, further supporting the need for other areas to support growth needs.

Conclusions

The Benton City and Richland proposals are consistent with the growth needs for the forthcoming twenty-year period. Through evaluation of the information provided in this memorandum, the proposed additional UGA land is needed to meet land-capacity needs for Benton City and Richland and to accommodate projected growth within Benton County as a whole to meet projected growth, housing, and service needs through 2046.

This conclusion is based on the current availability of existing or readily extendable public facilities and services, the ability to serve the proposed areas within the planning horizon, and the cities demonstrated needs for additional housing and community-serving land uses, along with the other factors described above.

Attachments

Community Development Department
102206 East Wiser Parkway
Kennewick, WA 9933

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

BENTON COUNTY PLANNING DIVISION APPLICATION
COMPREHENSIVE PLAN-URBAN GROWTH AREA AMENDMENT

RECEIVED
JAN 28 2026
Benton County
Planning Division

CPA File No. 2026-002

NAME OF CITY: Benton City

MAILING ADDRESS: 1009 Dale Ave. Suite A, Benton City WA 99320

CONTACT PERSON: Steve Zetz

EMAIL ADDRESS: szetz@ci.benton-city.wa.us

TELEPHONE: 509-588-3322

Please answer the following questions, if more space is needed please use attachments.

1. Addresses, parcel numbers and legal description of properties proposed for inclusion in the UGA: (add additional pages if necessary)

Area 1 Benton County Parcel Numbers 112964000005000, 112964000006000, 112964000010000, 112964000011000, 112964011346004, 112964011346003, 112964011346002, 112964011346001, 112964000009000, 112964000008000,
Area 2 Benton County Parcel Numbers 113964011991001, 113964011991002
See attached Legal Descriptions.

2. Prepare and attach a site map and aerial photo showing the proposed area in which a UGA amendment is being sought. Please show clearly the following: the proposed UGA boundary, current corporate boundaries, major physical boundaries; both natural and man-made (i. e., including but not limited to highways, railroads, rivers, streams, power lines, schools, and other public outbuildings, critical areas, open space, etc.), the proposed land use designations, pattern and acreages of urban land uses and densities for the area proposed for inclusion, with any residential areas requiring a minimum average density of six (6) dwelling units per acre, the general location and acreage of planned open spaces and greenbelts that will remain as open space within the area(s) proposed for inclusion within a UGA, as per RCW 36.70A.110(2);section, map scale, north arrow, township and range lines, and date of preparation, are to be shown and identified. If in a shoreline area, define existing shorelines area as shown in existing shorelines master plan and indicate the existing environment designation.

3. **What is the current use of the property proposed for inclusion in the UGA:**

Area 1 is undeveloped land with no assigned uses.

Area 2 containes 21.04 acres of State land currently used as a park, maintained and operated by Benton City. An additional 3.53. acres containes one single family dwelling unit.

4. What is the existing comprehensive plan designation for the area in which the property proposed for inclusion in the UGA:

The proposed area for inclusion has the following deisgnations according to the Benton County Planning Department GIS system. Area 1 - Rural Remote. Area 2- 21.04 acres Public, and 3.53 acres Rural Remote.

5. What is the City's proposed land use designation of the property proposed for inclusion in the UGA:

Area 1- Residential

Area 2- 21.04 acres of Parks, and 3.53 acres Residential (becuase of the proximity to the Yakima River and recent updates to the FEMA mapping it is likely that this residential designation may change to ensure compliance with FEMA guidelines.

6. What are the reasons for the requested amendment and include substantial information why the provisions, map designations, etc., of the adopted plan are not sufficient to satisfy the concern that gives rise to the amendment request:

Area 1- Is currently bordered on two sides by City limits and a third side is currently within the UGA. Recent changes to the flood map have significantly altered the Residential capacity of Benton City. In addition the growth in this area necessitates the need for devleopment in this area to occur at urban densities. Proximity to existing schools and infastructure makes this area an island that without the potential for annexation would likly result in development that is incompatible or inconsistent with urban standards and densities.

Area 2 - Is essentially a housekeeping item that allows the City to annex State land that is currently maintained by Benton City and used as a park. The residential piece is unlikley to ever develop further and is included in order to prevent an irregular boundary.

7. Include any other substantiated information that you feel is necessary or relevant for consideration: Recent changes to the FEMA flood maps have significantly reduced residential capacity. It is unknown at this time to what extent capacity has been reduced. During the Comprehensive Plan Update a new analysis will be required as well as alterations to all planning documents to include Capital Facilities. This UGA expansion request is likley insufficient to address the capacity reduction, however it does provide additional lands that are not encumbered by critical areas and can be more easily served by City services.

Mayor Signature	Printed Name	Date
Authorized City Representative	Printed Name	Date

ANY INFORMATION SUBMITTED TO THE BENTON COUNTY PLANNING DIVISION IS SUBJECT TO PUBLIC RECORDS DISCLOSURE LAW FOR THE STATE OF WASHINGTON (RCW CHAPTER 42.17) AND ALL OTHER APPLICABLE LAW THAT MAY REQUIRE THE RELEASE OF THE DOCUMENTS TO THE PUBLIC.

An application fee of $2000.00 must be submitted with this application. This fee is non- refundable. Please make check payable to Benton County Treasurer.

APPLICANT'S CHECKLIST FOR COMPLETENESS

- ☐ APPLICATION FORM COMPLETED AND SIGNED WITH REQUIRED FEES
- ☐ CITY COUNCIL ADOPTED UGA RESOLUTION
- ☐ MAPS AND AERIAL PHOTOS WITH REQUIRED INFORMATION
- ☐ UGA INFORMATION SPREADSHEET
- ☐ CITIES SEPA CHECKLIST, DETERMINATION, OR EIS IF REQUIRED
- ☐ CAPITAL FACILITIES PLAN AS REQUIRED BY RCW 36.70A.070(3) & RCW 36.70A.03

RESOLUTION NO. 2026-05

A RESOLUTION OF THE CITY OF BENTON CITY, WASHINGTON, REQUESTING BENTON COUNTY TO INITIATE THE FORMAL PROCESS FOR AN AMENDMENT TO THE URBAN GROWTH AREA BOUNDARY TO INCORPORATE APPROXIMATELY 58.18 ACRES OF LAND; AND FURTHER AUTHORIZING THE MAYOR TO EXECUTE AND SUBMIT ALL RELATED DOCUMENTS.

WHEREAS, the State of Washington's Growth Management Act (GMA) requires counties, in cooperation with cities, to designate an Urban Growth Area (UGA) sufficient to accommodate projected urban growth for a 20-year planning horizon; and

WHEREAS, the GMA further mandates that urban growth be encouraged within the UGA and discouraged outside of it, to promote orderly development and the efficient provision of public services; and

WHEREAS, a recent review of the existing UGA confirms that the proposed AREA 1 is bordered on 3 sides by Benton City, a map of which is attached hereto as **Exhibit A**, and that development of this property to County standards will have an adverse impact to the urban densities and development of the abutting incorporated city limits; and

WHEREAS, the area proposed for inclusion, legally described as AREA 2, is contiguous to the existing UGA boundary and is identified as the most logical and cost-effective area to provide necessary urban services, including sewer, water, transportation; and

WHEREAS, recent changes to Benton City's Floodplain and Floodway have reduced and altered the buildability of a significant amount of acreage along the Yakima River corridor; and

WHEREAS, Benton City has a duty to ensure that development occurs in areas suitable for urban densities; and

WHEREAS, the property described in AREA 2 consists of land currently owned by the State of Washington and is maintained under agreement by Benton City; and

WHEREAS, the proposed expansion is consistent with the Benton County County-Wide Planning Policies and serves an overriding public interest by protecting public health, safety, and welfare and enabling the locally adopted Comprehensive Plan to meet the goals of the State GMA; and

WHEREAS, the Benton City Planning Commission conducted a Public Hearing on January 12, 2026, and a recommendation to approve the expansion was made, see Findings of Fact attached hereto as **Exhibit B**; and

WHEREAS, the Benton City Council conducted a Public Hearing on January 20, 2026; and

WHEREAS, the Benton City Council has conducted due environmental review pursuant to the State Environmental Policy Act (SEPA) requirements, and relevant findings are incorporated herein.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF BENTON CITY, WASHINGTON, hereby resolves as follows:

That the Benton City Council hereby formally requests Benton County / County Commissioners to initiate the formal process for an amendment to the Urban Growth Area boundary.

Be It Further Resolved that the proposed expansion area, specifically identified in the attached exhibits, shall be added to the official Urban Growth Area map to provide for an adequate 20-year supply of developable land and to ensure its development to Urban standards.

Be It Further Resolved that the Mayor is hereby authorized and directed to execute and submit all necessary land use applications and related documents to effectuate this UGA expansion request, and to work cooperatively with county staff and the public throughout the review process.

Be It Further Resolved that this Resolution shall take effect immediately upon passage by City Council.

ADOPTED this 20th day of January, 2026, by the City Council of the City of Benton City, Washington, and signed in authentication of its passage this 20th day of January, 2026.

Resolution No. 2026-05 filed and recorded in the office of the City Clerk of the City of Benton City, Washington, this 20th day of January, 2026.

Len Burton, Mayor

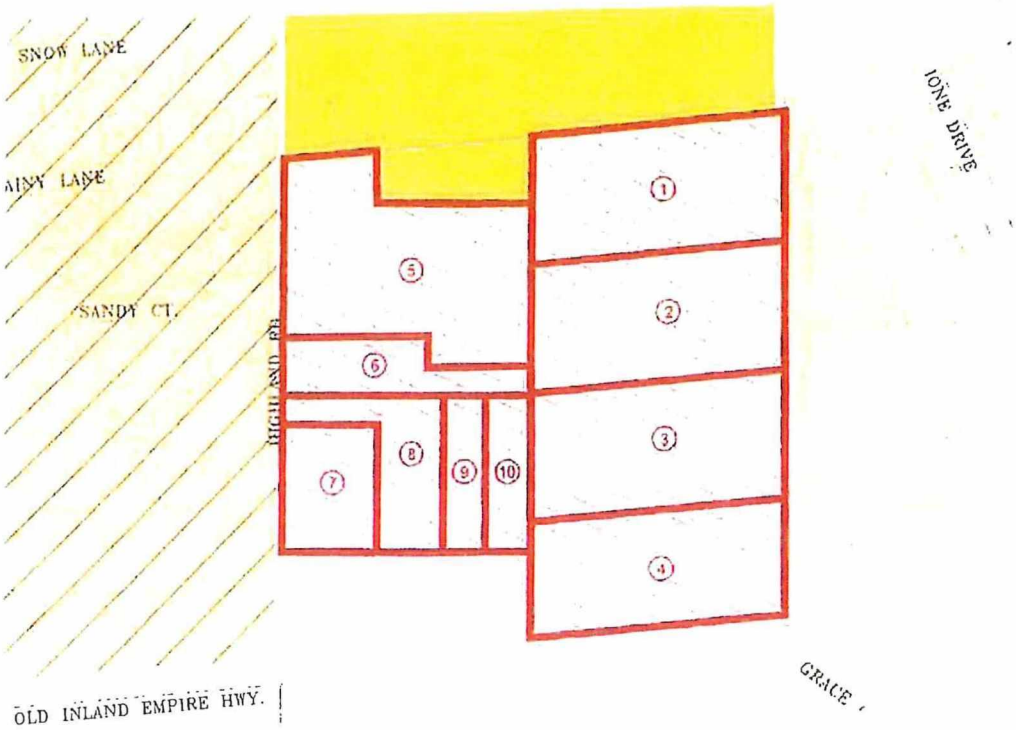
Attest:

Carla Meyer
City Clerk/Treasurer

Approved as to Form:

Kerr Ferguson Law, PLLC
City Attorneys

EXHIBIT A



PROPERTY DESCRIPTIONS

ALL PROPERTIES COUNTY ZONING: RL-5
PROPOSED CITY LAND USE: RESIDENTIAL

1. OLSEN FAMILY LLC
   112964000005000
   5.03 ACRES
2. OLSEN FAMILY LLC
   112964000006000
   5.03 ACRES
3. OLSEN FAMILY LLC
   112964000010000
   5.03 ACRES
4. OLSEN FAMILY LLC
   112964000011000
   4.52 ACRES
5. DWS ORCHARDS LLC
   112964000008000
   6.23 ACRES
6. DWS ORCHARDS LLC
   112964000009000
   1.95 ACRES
7. DWS ORCHARDS LLC
   112964011346001
   1.85 ACRES
8. DWS ORCHARDS LLC
   112964011346002
   1.97 ACRES
9. DWS ORCHARDS LLC
   112964011346003
   1.00 ACRES
10. DWS ORCHARDS LLC
    112964011346004
    1.00 ACRES

DETAIL 1

NORTH

AKANA

4. What is the existing comprehensive plan designation for the area in which the property proposed for inclusion in the UGA:

The proposed area for inclusion has the following deisgnations according to the Benton County Planning Department GIS system. Area 1 - Rural Remote. Area 2- 21.04 acres Public, and 3.53 acres Rural Remote.

5. What is the City's proposed land use designation of the property proposed for inclusion in the UGA:

Area 1- Residential

Area 2- 21.04 acres of Parks, and 3.53 acres Residential (becuase of the proximity to the Yakima River and recent updates to the FEMA mapping it is likely that this residential designation may change to ensure compliance with FEMA guidelines.

6. What are the reasons for the requested amendment and include substantial information why the provisions, map designations, etc., of the adopted plan are not sufficient to satisfy the concern that gives rise to the amendment request:

Area 1- Is currently bordered on two sides by City limits and a third side is currently within the UGA. Recent changes to the flood map have significantly altered the Residential capacity of Benton City. In addition the growth in this area necessitates the need for devleopment in this area to occur at urban densities. Proximity to existing schools and infastructure makes this area an island that without the potential for annexation would likly result in development that is incompatible or inconsistent with urban standards and densities.

Area 2 - Is essentially a housekeeping item that allows the City to annex State land that is currently maintained by Benton City and used as a park. The residential piece is unlikley to ever develop further and is included in order to prevent an irregular boundary.

7. Include any other substantiated information that you feel is necessary or relevant for consideration: Recent changes to the FEMA flood maps have significantly reduced residential capacity. It is unknown at this time to what extent capacity has been reduced. During the Comprehensive Plan Update a new analysis will be required as well as alterations to all planning documents to include Capital Facilities. This UGA expansion request is likley insufficient to address the capacity reduction, however it does provide additional lands that are not encumbered by critical areas and can be more easily served by City services.

Mayor Signature	Len Burton	1-30-26
	Printed Name	Date

Authorized City Representative	Stephen Zelz	1-26-2026
	Printed Name	Date

ANY INFORMATION SUBMITTED TO THE BENTON COUNTY PLANNING DIVISION IS SUBJECT TO PUBLIC RECORDS DISCLOSURE LAW FOR THE STATE OF WASHINGTON (RCW CHAPTER 42.17) AND ALL OTHER APPLICABLE LAW THAT MAY REQUIRE THE RELEASE OF THE DOCUMENTS TO THE PUBLIC.

An application fee of $2000.00 must be submitted with this application. This fee is non- refundable. Please make check payable to Benton County Treasurer.

BENTON CITY
24-002-23

LAND CAPACITY ANALYSIS

11/4/25

Based on Benton County's Uniform Formula in Policy #4 of the County Wide Planning Policy

2025 Population Estiamte	4,418
2045 Population Estimate	5,517

	Land Use	Total Acres	Developed Acres AC	Underutilized/ Vacant AC	Current per Capita Value AC/person	Needed Area for 2045 Population AC
A	**Residential**	904.85	816.10	88.75	0.1847	1,019.11
	R2	789.22	717.94	71.28	0.1625	896.54
	R3	77.25	66.37	10.89	0.0150	82.88
	R3M	38.37	31.79	6.58	0.0072	39.69
A-1	**AS**	210.60	210.60	0.00	0.0000	
B	**Parks**	35.51	35.51	0.00	0.0080	44.34
C	**City**	40.04	40.04	0.00	0.0091	50.00
D	**Schools**	52.27	52.27	0.00	0.0118	65.27
E	**Commerical**	69.21	51.21	17.99	0.0116	63.95
F	**Industrial**	385.94	107.89	278.05	0.0244	134.73
G	**Open Space**	0	0	0.00	0.0000	0.00
H	**Right-of-Ways**		138.18		0.0313	172.56
I	**70% Build Out Residential of 904.85 ac**		633.39		0.1434	790.95
	A-I Total				0.4243	**2,340.91**
J	25% A-I Total				0.5304	2,926.14
K	Critical Area Credit		80.88		0.0183	100.99
	TOTAL ADJUSTED(J-K)				0.5121	**2,825.14**
		1698.42	2129.72			

Total City Acreage	1698.42
Total UGA Acreage	399.90

Needed Area for 2045	**2,825.14**	**ac**
Total City & UGA Land	**2,098.32**	**ac**
Additional Land Requirement	**726.82**	**ac**

NOTES

1 Population Estimate from City Population Estimate based on OFM Population Projections and Benton City considered to be 2% of Benton County's total population. Estimates from 2025 and 2045 are used in the Land Capaicy Analysis.

2 AS (Ag-Suburban) is considered fully developed as most of this is in the flood plain and no large developments will occur in this zoning. Therefore it is not considered for additional land as it will skew the acual results. It however, included in the Total City & UGA Land.

3 Open Space (Item G) is considered to be within the parks and school land areas and shows a "0" in the

4 Needed Area for 2045 = 2045 Population x Total Adjusted per capita land use value of 0.5121 ac/person

53.28%	48%				
46.47%	42%				
4.55%	4%				
2.26%	2%				
12.40%	12%				
2.09%	2%		8.037573563		
2.36%	2%				
3.08%	3%	8%			
4.07%	3%				
22.72%	6%				
0.00%	0%				
0.00%	8%				
0.00%	37%				
0.00%	0%				
0.00%	0%				
0.00%	5%			County underdeveloped	45
0.00%				County Total	399.9
				% County Developed	0.887472
1,550					
				City underdeveloped	88.75
				city Developed	2129.72
				City Total	1698.42
				% City Developed	1.253941

BENTON CITY

LAND USE MAP

JANUARY 12, 2026

PROPOSED UGA EXPANSION

AREA 1
33.61 ACRES
SEE DETAIL 1,
SHEET 2

AREA 2
21.04 ACRES
SEE DETAIL 2,
SHEET 3

NORTH

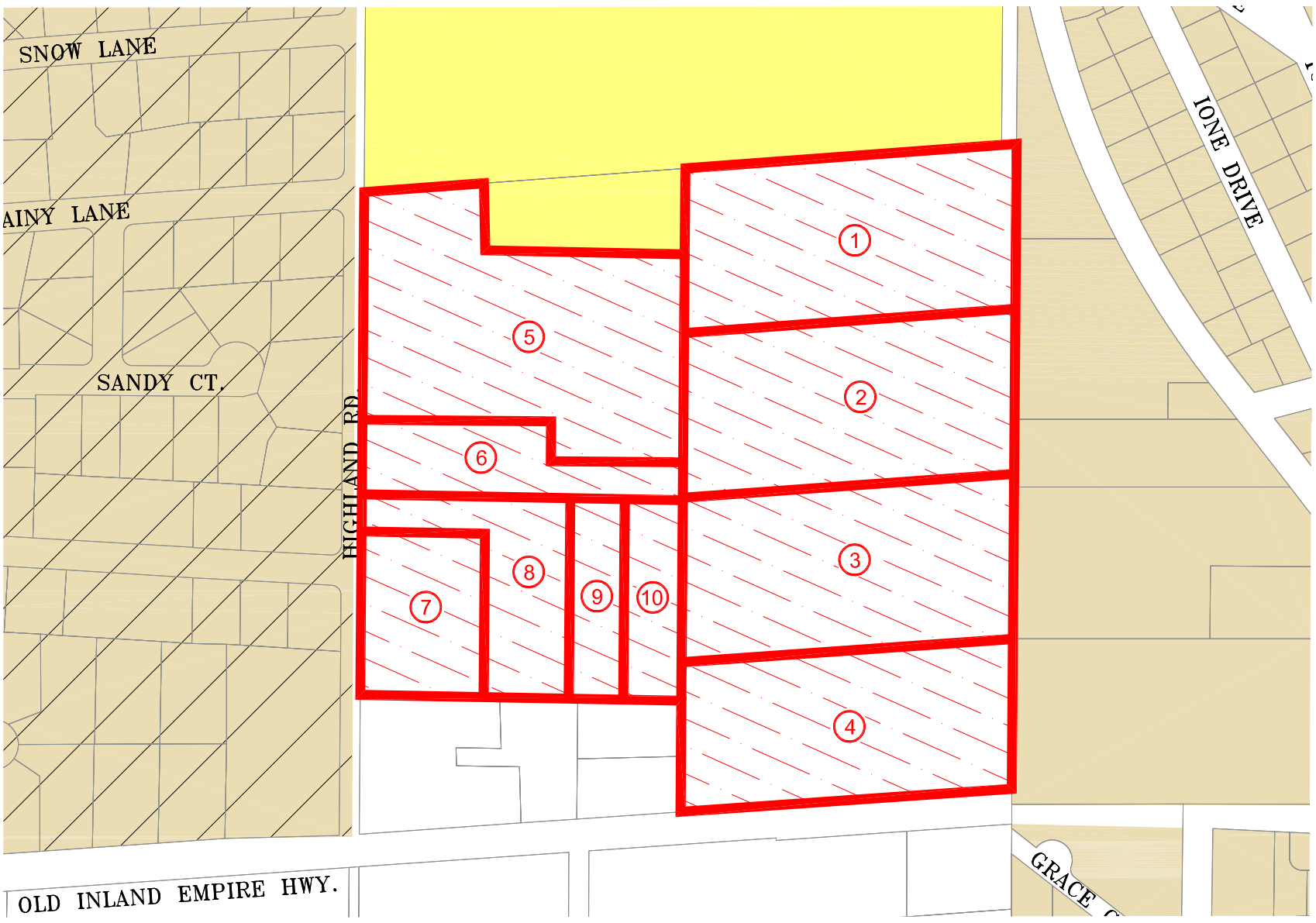
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SCALE IN FEET

LEGEND

- CITY LIMITS
- RESIDENTIAL
- AGRICULTURE SUBURBAN
- COMMERCIAL
- MANUFACTURING/LIGHT INDUSTRIAL
- GOVERNMENT
- RIVER
- PARKS
- FLOODWAY
- EXISTING UGA
- PROPOSED UGA

AKANA
Plan + Design + Engineer + Manage
2815 Saint Andrews Loop, Ste B
Pasco, WA 99301
Voice (503) 652-9090



PROPERTY DESCRIPTIONS

ALL PROPERTIES COUNTY ZONING: RL-5
PROPOSED CITY LAND USE: RESIDENTIAL

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   1.95 ACRES
7. DWS ORCHARDS LLC
   112964011346001
   1.85 ACRES
8. DWS ORCHARDS LLC
   112964011346002
   1.97 ACRES
9. DWS ORCHARDS LLC
   112964011346003
   1.00 ACRES
10. DWS ORCHARDS LLC
    112964011346004
    1.00 ACRES

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NORTH

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PROPERTY DESCRIPTIONS

DETAIL 2

NORTH

(11) GOODE LLOYD L
113964011991001
3.53 ACRES
CURRENT COUNTY ZONING: RL-5
PROPOSED CITY LAND USE: RESIDENTIAL

(12) DEPARTMENT OF WILDLIFE
113964011991002
15.70 ACRES
CURRENT COUNTY ZONING: PARKS
PROPOSED CITY LAND USE: PARKS

(13) KIONA IRRIGATION DISTRICT RIGHT OF WAY
≈1.81 ACRES
CURRENT COUNTY ZONING: RL-5
PROPOSED CITY LAND USE: PARKS

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DETERMINATION OF NON-SIGNFICANCE

1. **Date of Issuance:** December 19, 2025
2. **Lead Agency:** City of Benton City
3. **Staff Contact:** Paula Kauer, Finance Manager 1009-A Dale Ave, Benton City WA 99320 Telephone 509-588-3322
4. **Name of Proposal:** Comprehensive Plan & UGA Amendment

Description of Proposal: The proposal is a non-project action that includes amendments to specific areas of the Benton City Comprehensive Plan text and UGA Map per RCW 36.70A.070 (3), RCW 36.70A.110(1)&(3), RCW 36.070A.020(1) & (2), relevant Beton County Countywide Planning Policies (CWPP). The latest Comprehensive Plan was adopted in 2021.

Location of Proposal: City-wide and at various locations in the City. See SEPA checklist for specific locations.

Findings:

1. The City finds that the non-project action will not results in adverse impacts to the environment.
2. The City further finds that future development that may occur in the locations where map changes may occur will be subject to compliance with the Benton City Municipal Code, SEPA and other applicable regulations that will ensure mitigation of any potential adverse impacts to the environment.

Mitigation Measures: None

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

☒ This DNS is issued under WAC 197-11-340 and the lead agency will not act on this proposal for 14 days from the date of issuance listed above.

Responsible Official	Len Burton
Position/Title	Mayor
Address:	1009-A Dale Ave, Benton City WA 99320
Phone:	509-588-3322
Signature:	

Appeal: Any agency or person may appeal the lead agency's environmental determination per BCMC 16.02.170. Appeals of this decision are accepted until 4:00 pm, January 9th, 2026.

SEPA[1] Environmental Checklist: BENTON CITY UGA

Purpose of checklist

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization, or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. **You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown.** You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to **all parts of your proposal**, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for lead agencies

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B, plus the Supplemental Sheet for Nonproject Actions (Part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in "Part B: Environmental Elements" that do not contribute meaningfully to the analysis of the proposal.

A.Background

Find help answering background questions[2]

1. **Name of proposed project, if applicable:**

   2026 Comprehensive Plan Update and Urban Growth Area (UGA)Revision

2. **Name of applicant:**

   Benton City

3. **Address and phone number of applicant and contact person:**

   Carla Meyer, City Clerk/Treasurer
   City of Benton City
   PO Box 70-1009 Dale Ave, Suite A
   Benton City, WA 99320
   (509) 588-3322

   Contact Person: Alan Rainey, PE
   Akana
   2815 Saint Andrews Loop, Suite B
   Pasco, WA 99301
   (971)328-3007

4. **Date checklist prepared:**

   November 14, 2025 by Alan Rainey of Akana

5. **Agency requesting checklist:**

   Benton City

6. **Proposed timing of schedule (including phasing, if applicable):**

   Adoption of the 2026 Comprehensive Plan Update and UGA Revision is expected to be complete by September 30, 2026.

7. **Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.**

   Yes, Revisions to UGA.

8. **List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.**

   This SEPA checklist.

9. **Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.**

   No.

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

    Benton County approval will be needed for any proposed Benton City UGA revisions.

11. **Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you**

to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

The proposal is a non-project action that includes amendments of specific areas of the Benton City Comprehensive Plan text and land use map as allowed once-per-year in accordance with WAC Chapter 365-196 and the Benton City Municipal Code, section 2.70.030(E). The Comprehensive Plan was last amended in 2020.

The proposal includes revisions to the Benton City UGA.

12. **Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.**

The proposed text amendments to the Comprehensive Plan apply generally to all properties located within the current limits of Benton City. The City is located in Benton County, in eastern Washington State, in the mid-Columbia Valley. The Yakima River flows along portions of the east and west borders of the city and through a southern section of the city. Interstate 82 divides the city with approximately one-third of the city south of the interstate.

Parcels not previously located within the Benton City UGA that are proposed for inclusion in the Benton City UGA are:

	PARCEL #	OWNER	SIZE
	HIGH SCHOOL AREA		(Acres)
1	112964000005000	Olsen Family LLC	5.03
2	112964000006000	Olsen Family LLC	5.03
3	112964000010000	Olsen Family LLC	5.03
4	112964000011000	Olsen Family LLC	4.52
5	112964000008000	DWS Orchards LLC	6.23
6	112964000009000	DWS Orchards LLC	1.95
7	112964011346001	DWS Orchards LLC	1.85
8	112964011346002	DWS Orchards LLC	1.97
9	112964011346003	DWS Orchards LLC	1.00
10	112964011346004	DWS Orchards LLC	1.00
	TOTAL		33.61
	RIVER AREA		
11	113964011991001	Goode Lloyd L	3.53
12	113964011991002	Dept. of Wildlife	15.70
13	Irrigation ROW	Kiona Benton (~ area)	1.81
	TOTAL		21.04

B. Environmental Elements

1. Earth

a. General description of the site:

Circle or highlight one: Flat, rolling, hilly, steep slopes, mountainous, other:

Many types of terrain, including flat, rolling, hilly, and steep slopes are found within Benton City.

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

Some areas of the City have slopes exceeding 15 percent.

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

Soils within Benton City are predominantly Starbuck-Scooteney-Rock outcrop with some Warden-Shano-Esquatzel type soils in the southern portion of the city.

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

No.

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

Not applicable.

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

Not applicable.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

Not applicable.

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

Through the application of the City's Critical Areas Ordinance and other regulations to reduce or control erosion during approved land development projects.

2. Air

a. **What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.**

Not applicable.

b. **Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.**

Not applicable.

c. **Proposed measures to reduce or control emissions or other impacts to air, if any:**

None proposed.

3. Water

a. Surface:

1. **Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.**

   The Yakima River flows along portions of the east and west borders of the city and through a southern section of the city.

2. **Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.**

   None proposed

3. **Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.**

   None proposed

4. **Will the proposal require surface water withdrawals or diversions? Give a general description, purpose, and approximate quantities if known.**

   None proposed

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

   Portions of the city lie in the 100-year floodplain and floodways. The proposed changes to the comprehensive plan apply generally to all properties located within the current limits of Benton City. A portion of Parcel 113964011991002 located

adjacent to 14th Street, directly adjacent to the Yakima River, is within the flood plain.

6. **Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.**

   No discharges. Future proposed projects will be individually reviewed for site-specific impacts.

b. Ground:

1. **Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give a general description, purpose, and approximate quantities if known.**

   None proposed. Future proposed projects will be individually reviewed for site-specific impacts.

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

   None proposed. Future proposed projects will be individually reviewed for site-specific impacts.

c. Water Runoff (including stormwater):

1. **Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.**

   None proposed. Future proposed projects will be individually reviewed for site-specific impacts.

2. **Could waste materials enter ground or surface waters? If so, generally describe.**

   Not applicable.

3. **Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.**

   Not applicable.

d. **Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:**

Not applicable. Compliance with the City's Critical Areas Ordinance, the SMP and other regulations are compulsory.

4. Plants

Find help answering plants questions

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

☒ **deciduous tree: alder, maple, aspen, other**

☒ **evergreen tree: fir, cedar, pine, other**

☒ **shrubs**

☒ **grass**

☒ **pasture**

☒ **crop or grain**

☒ **orchards, vineyards, or other permanent crops.**

☒ **wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other**

☐ **water plants: water lily, eelgrass, milfoil, other**

☒ **other types of vegetation**

b. **What kind and amount of vegetation will be removed or altered?**

None proposed. Future proposed projects will individually be reviewed for site-specific impacts.

c. **List threatened and endangered species known to be on or near the site.**

None applicable. Future proposed projects will be individually reviewed for site-specific impacts.

d. **Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.**

None proposed. Future proposed projects will be individually reviewed for site-specific impacts.

e. **List all noxious weeds and invasive species known to be on or near the site.**

Future proposed projects will be individually reviewed for site-specific impacts.

5. Animals

a. **List any birds and other animals that have been observed on or near the site or are known to be on or near the site.**

Examples include:

- **Birds: hawk, heron, eagle, songbirds, other:**
- **Mammals: deer, bear, elk, beaver, other:**
- **Fish: bass, salmon, trout, herring, shellfish, other:**

Nearly all the Above listed species have occasionally been observed in Benton City except bear, herring, and shellfish.

b. **List any threatened and endangered species known to be on or near the site.**

The Washington Department of Fish and Wildlife Priority Habitat and Species maps show the Townsend's Ground Squirrel and the Ferruginous hawk as Candidate and Threatened species, respectively, within the general area of Benton City. However, relative to listed species, future proposed projects will be individually reviewed for site-specific impacts.

c. **Is the site part of a migration route? If so, explain.**

Yes, the entire Columbia basin is located within known migratory routes for salmonids and migratory birds.

d. **Proposed measures to preserve or enhance wildlife, if any.**

Not applicable. Future proposed project will be individually reviewed for site-specific impacts as well as site-specific mitigation of determined impacts where mitigation is required. All projects will be required to comply with the City's Critical Areas Ordinance.

e. **List any invasive animal species known to be on or near the site.**

Not applicable. However, relative to listed species, future proposed projects will be individually reviewed for site-specific impacts and for compliance with the City's adopted Critical Areas Ordinance.

6. Energy and natural resources

a. **What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.**

Future proposed projects will be individually reviewed for site-specific impacts.

b. **Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.**

Not applicable.

c. **What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.**

Not applicable.

7. Environmental health

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

No.

1. **Describe any known or possible contamination at the site from present or past uses.**

   Not applicable. Future proposed projects will be individually reviewed for site-specific conditions.

2. **Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.**

   Not applicable.

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

   Not applicable.

4. **Describe special emergency services that might be required.**

   Not applicable.

5. **Proposed measures to reduce or control environmental health hazards, if any.**

   Not applicable.

b. Noise

1. **What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?**

   Not applicable. Future proposed projects will be individually reviewed for site-specific conditions.

2. **What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?**

The majority of the proposals involve changes from an existing land use or one to one that is residential and future development will not typically result in greater levels of noise than the previous designations would have generated.

3. **Proposed measures to reduce or control noise impacts, if any:**

   None proposed.

8. Land and shoreline use

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

   Parcel 113964011991002 is a park left in natural habitat. The City will maintain this property in natural habitat.

b. **Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?**

   None of the parcels involved in the proposals have been used as working farmlands or working forest lands.

   1. **Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?**

      No.

c. **Describe any structures on the site.**

   Structures are located on various parcels within the existing city limits and UGA and within the proposed areas to be added to the UGA.

d. Will any structures be demolished? If so, what?

None proposed at this time.

e. What is the current zoning classification of the site?

Zoning classifications vary throughout the proposals. See the Zoning Map.

f. What is the current comprehensive plan designation of the site?

Land use designations vary throughout the proposals. See the Land Use Map

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

There are several different shoreline master program shoreline environment designations throughout the City alone shorelines.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

A variety of sensitive areas have been designated throughout the City. These areas are typically related to shorelines, floodplains, steep slopes, wetlands, and miscellaneous habitat areas.

i. Approximately how many people would reside or work in the completed project?

Not applicable.

j. Approximately how many people would the completed project displace?

Not applicable.

k. Proposed measures to avoid or reduce displacement impacts, if any.

None proposed.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.

Application of policies and guidelines as established by the comprehensive plan.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

Application of policies and guidelines as established by the comprehensive plan.

9. Housing

a. **Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.**

None at this time.

b. **Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.**

None.

c. **Proposed measures to reduce or control housing impacts, if any:**

None proposed.

10. Aesthetics

a. **What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?**

Not applicable.

b. **What views in the immediate vicinity would be altered or obstructed?**

Not applicable.

c. **Proposed measures to reduce or control aesthetic impacts, if any:**

Not applicable.

11. Light and glare

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

Not applicable.

b. **Could light or glare from the finished project be a safety hazard or interfere with views?**

Not applicable.

c. **What existing off-site sources of light or glare may affect your proposal?**

Not applicable.

d. **Proposed measures to reduce or control light and glare impacts, if any:**

None proposed.

12. Recreation

a. **What designated and informal recreational opportunities are in the immediate vicinity?**

Not applicable.

b. **Would the proposed project displace any existing recreational uses? If so, describe.**

No.

c. **Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:**

None proposed.

13. Historic and cultural preservation

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

Not applicable.

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

Not applicable.

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

Not applicable.

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

None proposed.

14. Transportation

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

The existing City and County street systems serve the geographic area for the proposed UGA revisions. Future developments within the UGA will be evaluated for impacts to the existing street systems.

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

Benton City is served by Ben Franklin Transit.

c. **How many additional parking spaces would be the completed project or non-project have? How many would the project or proposal eliminate?**

None at this time.

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

Not applicable.

e. **Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.**

Not applicable.

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

Not applicable as this is a non-project action.

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

Not applicable.

h. **Proposed measures to reduce or control transportation impacts, if any:**

None proposed.

15. Public services

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

Not applicable as this is a non-project action.

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

None proposed.

16. Utilities

a. **Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:**

All utilities are available within Benton City, to various extents.

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

Not applicable as this is a non-project action.

C.Signature

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

X 

Type name of signee: Len Burton, Mayor

Position and agency/organization: Mayor, Benton City

Date submitted: December 19, 2025

D. Supplemental sheet for non-project actions

Do not use this section for project actions.

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

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

   As a non-project action, the proposal will not increase discharge to water; emissions to air, production, storage, or release of toxic or hazardous substances; or production of noise. Most of the proposed land use designation and zoning changes will not result in more intense development of the specific parcels however, some changes may facilitate additional dwelling units can contribute to increased emissions to air (typical of household uses) and production of noise (typical household uses).

   - **Proposed measures to avoid or reduce such increases are:**

     None proposed.

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

   As a non-project action, the proposal will not affect plants, animals, fish, or marine life. The changes under this proposal will not change any aspect of the city's protection of these items under the Critical Areas Ordinance.

   - **Proposed measures to protect or conserve plants, animals, fish, or marine life are:**

     None proposed. Further, all site-specific projects are required to comply with all local, state, and federal laws regarding the protection of endangered species.

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

   As a non-project action, the proposal will not deplete energy or natural resources. Potential development will increase demands for energy and natural resources regardless of the Comprehensive Plan amendments. Future proposed projects will be individually reviewed for site-specific impacts.

   - **Proposed measures to protect or conserve energy and natural resources are:**

     None proposed.

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

No direct impacts to environmentally sensitive areas or areas designated to government protection are expected as a result of the non-project action.

- **Proposed measures to protect such resources or to avoid or reduce impacts are:**

  Fish and Wildlife Habitat Conservation Areas are established and mapped to protect habitats for federal or state endangered, threatened, sensitive, candidate, and priority species of fish, wildlife or plants, following best available science. These areas are considered worth protecting not only for the health of fish and wildlife species but because the habitats themselves help improve water quality, increase soil health, and affect hydrology which results in a reduction of flooding. The City regulates development in or near these habitats.

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

   Any proposed use or development within the city is subject to the City's Comprehensive Plan and any proposed use or development within shoreline jurisdiction is also subject to the City's Shoreline Master Program.

   - **Proposed measures to avoid or reduce shoreline and land use impacts are:**

     None proposed.

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

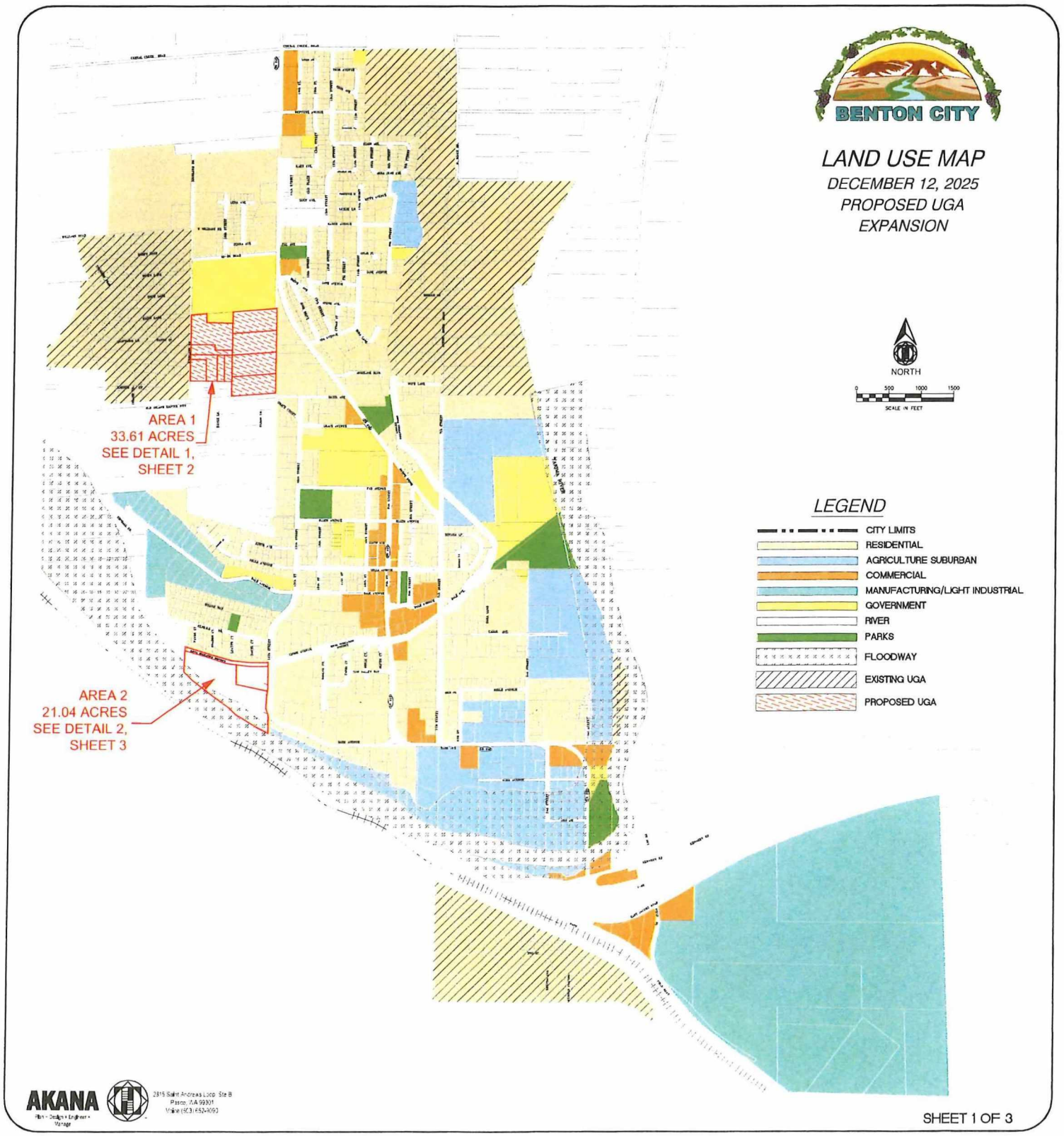
   As a non-project action, the amendments to the Comprehensive Plan will not directly increase demands on transportation or public services and utilities.

   - **Proposed measures to reduce or respond to such demand(s) are:**

     None proposed.

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

   It is not the intent of the Comprehensive Plan amendments to conflict with local, state, or federal laws or requirements for the protection of the environment. All future development projects will be required to comply with the City's Critical Ordinances and all relevant local, state, and federal laws regarding the protection of the environment.



AKANA
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2815 Saint Andrews Loop Ste B
Pasco, WA 99301
Voice (509) 582-9090



PROPERTY DESCRIPTIONS

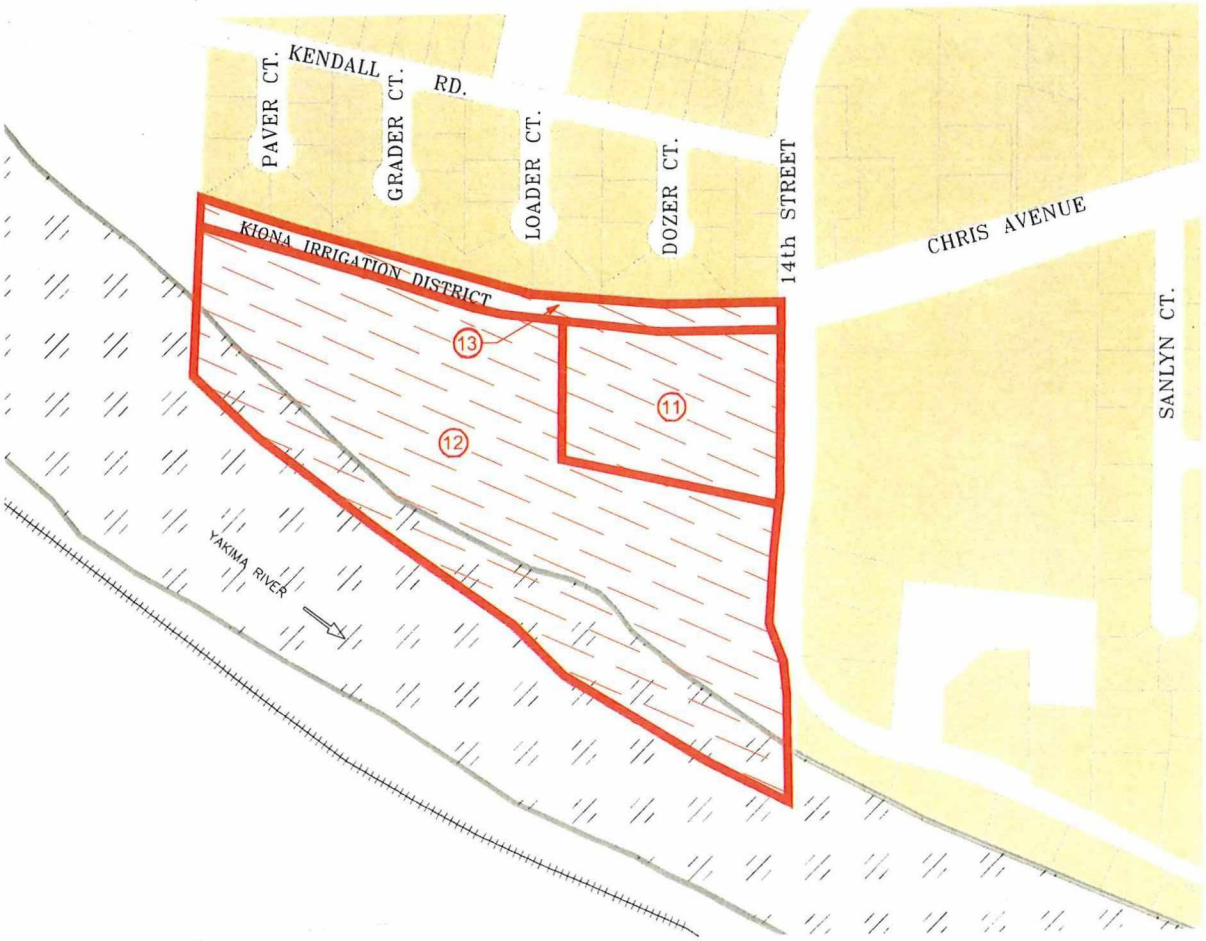
ALL PROPERTIES COUNTY ZONING: RL-5
PROPOSED CITY LAND USE: RESIDENTIAL

1. OLSEN FAMILY LLC
   112964000005000
   5.03 ACRES
2. OLSEN FAMILY LLC
   112964000006000
   5.03 ACRES
3. OLSEN FAMILY LLC
   112964000010000
   5.03 ACRES
4. OLSEN FAMILY LLC
   112964000011000
   4.52 ACRES
5. DWS ORCHARDS LLC
   112964000008000
   6.23 ACRES
6. DWS ORCHARDS LLC
   112964000009000
   1.95 ACRES
7. DWS ORCHARDS LLC
   112964011346001
   1.85 ACRES
8. DWS ORCHARDS LLC
   112964011346002
   1.97 ACRES
9. DWS ORCHARDS LLC
   112964011346003
   1.00 ACRES
10. DWS ORCHARDS LLC
    112964011346004
    1.00 ACRES

DETAIL 1

NORTH

AKANA
Plan • Design • Engineer • Manage
2315 Saint Andrews Loop Ste B
Pasco, WA 99301
Phone (509) 452-3090



PROPERTY DESCRIPTIONS

DETAIL 2

NORTH

(11) GOODE LLOYD L
113964011991001
3.53 ACRES
CURRENT COUNTY ZONING: RL-5
PROPOSED CITY LAND USE: RESIDENTIAL

(12) DEPARTMENT OF WILDLIFE
113964011991002
15.70 ACRES
CURRENT COUNTY ZONING: PARKS
PROPOSED CITY LAND USE: PARKS

(13) KIONA IRRIGATION DISTRICT RIGHT OF WAY
≈1.81 ACRES
CURRENT COUNTY ZONING: RL-5
PROPOSED CITY LAND USE: PARKS

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7815 Saint Andrews Loop Ste B
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Voice (509) 652-7093

Community Development Department
102206 East Wiser Parkway
Kennewick, WA 9933

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

Received
NOV 2 6 2025
Benton County Planning Division

BENTON COUNTY PLANNING DIVISION APPLICATION
COMPREHENSIVE PLAN - URBAN GROWTH AREA AMENDMENT

CPA File No. CPA 2026-001

NAME OF CITY: Richland, Washington

MAILING ADDRESS: 625 Swift Blvd., MS-35 Richland, WA 99352

CONTACT PERSON: Mike Stevens (Planning Manager)

EMAIL ADDRESS: mstevens@richlandwa.gov

TELEPHONE: (509) 942-7596

Please answer the following questions, if more space is needed please use attachments.

1. Addresses, parcel numbers and legal description of properties proposed for inclusion in the UGA: (add additional pages if necessary)

A. Badger Mountain Hill Top – ***UGA Removal***	
Address	Undetermined
Parcel number	1-289-8400-000-0000 (ALL) and 1-289-8200-000-2002 (Portion)
Legal Description	Parcel 1-289-8400-000-0000: SOUTH HALF OF THE SOUTHEAST QUARTER, & THE SOUTH HALF OF THE NORTHWEST QUARTER OF THE SOUTHEAST QUARTER, ALL IN SECTION 28, TOWNSHIP 9 NORTH, RANGE 28 EAST, W.M. BENTON COUNTY, WASHINGTON The complete legal description for Parcel 1-289-8200-000-2002: All of Section 28, Township 9 North, Range 28 East, W.M., Benton County Washington; EXCEPT the North half of the Northeast quarter of Section 28, Township 9 North, Range 28 East, W.M., lying Southerly and Westerly of a line drawn from the Southeast corner of said section to a point 2000 feet North of the Southwest corner of said section; AND EXCEPT a portion of land located in the Southwest quarter defined as follows: Commencing at the North quarter corner of said Section 28, Township 9 North, Range 28 East, W.M.; thence South 10°01'52" West for 3337.15 feet to U.S.C. and G.S.

	Triangulation State "Erie"; thence North 19°17'24" East for 105.95 feet to the Northwest corner of a microwave building site as said site is described in that certain assignment of lease recorded under Auditor's File No. 446559 and the True Point of Beginning; thence North for 87.00 feet; thence West for 50.00 feet; thence South for 100.00 feet; thence East for 50 feet; thence North for 13 feet to the True Point of Beginning; AND EXCEPT the South half of the Southeast quarter and the South half of the Northwest quarter of the Southeast quarter; AND EXCEPT that portion of the South half of the Northeast quarter defined as follows: Beginning at the Southeast corner of the Northwest quarter being the True Point of Beginning; thence North 00°30'34" East along the East line of said section a distance of 1297.69 feet to the Northeast corner of said South half; thence North 89°33'51" West along the North line of said South half a distance of 2612 feet to the Northwest corner thereof; thence South 00°05'01" West along the West line of said South half a distance of 36.60 feet; thence South 63°46'35" East a distance of 2898.79 feet to the True Point of Beginning; AND EXCEPT that portion of the Northeast quarter of the Northwest quarter of Section 28, Township 9 North, Range 28 East, W.M., defined as follows: Beginning at the Northeast corner; thence South along the East line of the Northwest quarter a distance of 1320 feet; thence on a 45°00 00" diagonal line to the Northwest corner of the Northeast quarter of the Northwest quarter; thence East for 1320 feet to the True Point of Beginning; EXCEPT that portion of the West half of Section 28, Township 9 North, Range 28 East, W.M., Benton County, Washington described as follows: Beginning at the Northeast corner; Thence South along the East line of the Northwest quarter a distance of 1320 feet; thence on a 45°00'00" diagonal line to the Northwest corner of the Northeast quarter of the Northwest quarter; thence east for 1320 feet to the True Point of Beginning; EXCEPT that portion of the West half of Section 28, Township 9

	North, Range 28 East, W.M., Benton County, Washington, described as follows: Beginning at the Northwest corner of said Section 28; thence South 0°19'13" East along the West line of said section 2670.58 feet to the West quarter corner of said Section 28; thence North 77°35'14" East 545.50 feet to the True Point of Beginning; thence South 67°15'52" East 226.09 feet; thence North 72°22'39" East 625.19 feet; thence South 60°39'13" East 1104.14 feet; thence South 16°57'54" West 453.26 feet; thence North 82°06'36" West 245.56 feet; thence North 65°02'13" West 1178.69 feet; thence South 87°34'33" West 351.21 feet; thence North 04°30'54" East 357.57 feet to the True Point of beginning.

B. Harvest Ridge Addition – ***UGA Addition***	
Address	Undetermined (Harvest Ridge Tract A)
Parcel number	1-058-8101-000-1000
Legal Description	HARVEST RIDGE, TRACT A. RECORDED IN VOLUME 15 OF PLATS AT PAGE 0768, RECORDS OF BENTON COUNTY, WASHINGTON. AF# 2024-001403, 01/24/2024.

C. Dallas Road Recreation Center Addition – ***UGA Addition***	
Address	12702 N Dallas Road
Parcel number	1-299-8201-246-5001 (Portion of approx. 190 acres)
Legal Description	The complete legal description for the parcel is: Section 29 Township 9 Range 28 SHORT PLAT #2465 LOT 1 99-038122. (This parcel also crosses into sections 28, 32 & 33)

D. Inclusion of the Harvest Ridge (2024 Subdivision) site and the Kennewick School District school site – ***UGA Addition***	
Address	Various addresses on Haystack Street, Harvest Ridge Loop, Grange Street and Ambrosia Street and KSD site: Undetermined
Parcel number	The series of parcels numbered 1-058-8101-000-0001 through 1-058-8101-000-0042 and KSD site: 1-058-8402-000-0053
Legal Description	Harvest Ridge, Lots 1 through 42 and KSD site: THAT PORTION OF LOT 1, PLAT OF THE RIDGE AT REATA WEST PHASE 1, ACCORDING TO THE SURVEY THEREOF RECORDED UNDER AUDITOR'S FILE NUMBER 2012-034163, RECORDS OF BENTON COUNTY, WASHINGTON, SITUATE IN SECTION 4 AND 5 TOWNSHIP 8 NORTH, RANGE 28 EAST W.M.

2. Prepare and attach a site map and aerial photo showing the proposed area in which a UGA amendment is being sought. Please show clearly the following: the proposed UGA boundary, current corporate boundaries, major physical boundaries; both natural and man- made (i. e., including but not limited to highways, railroads, rivers, streams, power lines, schools, and other public outbuildings, critical areas, open space, etc.), the proposed land use designations, pattern and acreages of urban land uses and densities for the area proposed for inclusion, with any residential areas requiring a minimum average density of six (6) dwelling units per acre, the general location and acreage of planned open spaces and greenbelts that will remain as open space within the area(s) proposed for inclusion within a UGA, as per RCW 36.70A.110(2);section, map scale, north arrow, township and range lines, and date of preparation, are to be shown and identified.

   If in a shoreline area, define existing shorelines area as shown in existing shorelines master plan and indicate the existing environment designation.

   See Exhibits A through E on the following pages.

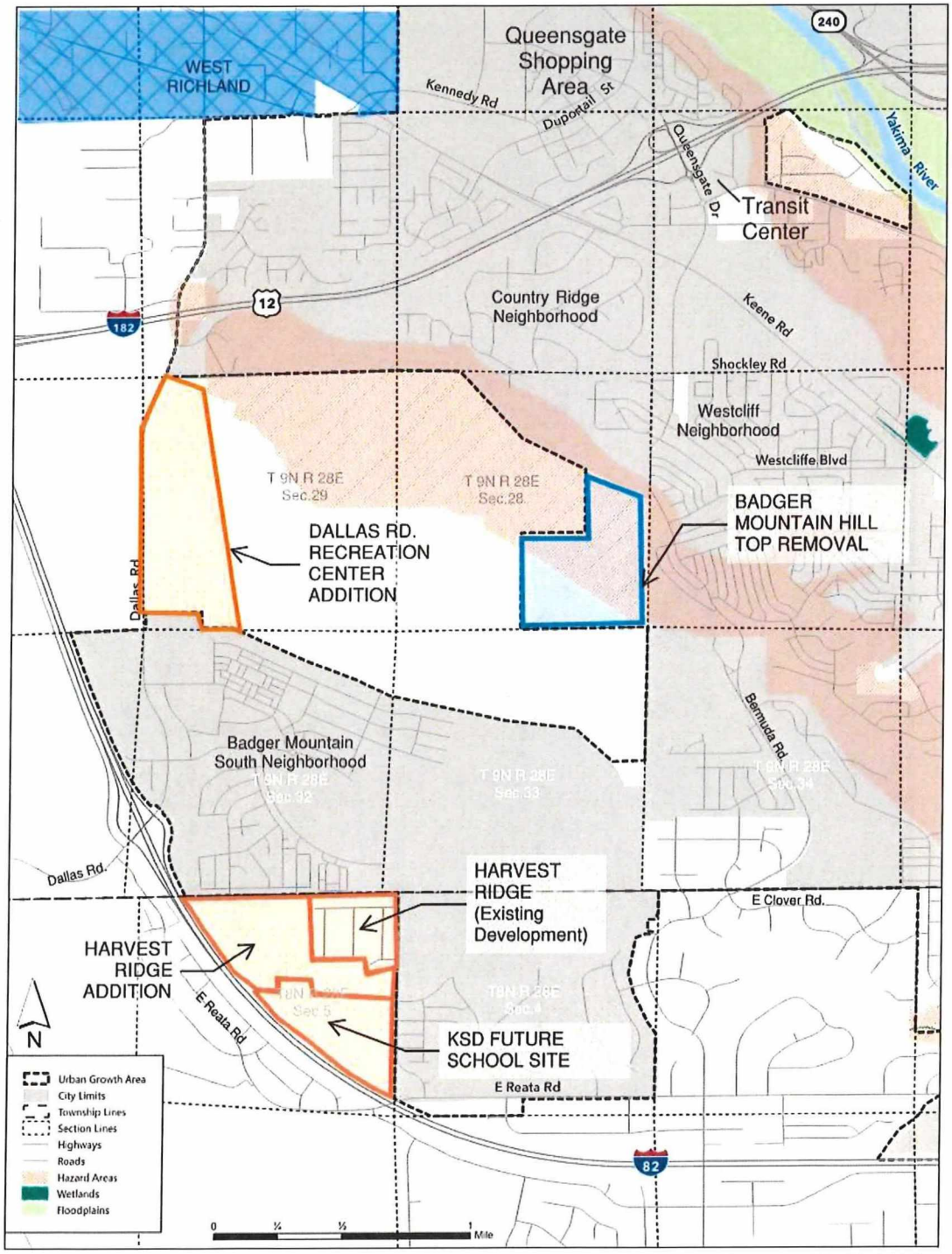


Exhibit A: Site Map with surrounding features, selected critical areas (Prepared 11/25/25)
Note: Critical Aquifer Recharge Areas are not shown; See Exhibit C for Priority Habitat Areas per WDFW



Exhibit B: Aerial Image (Prepared 11/25/25)

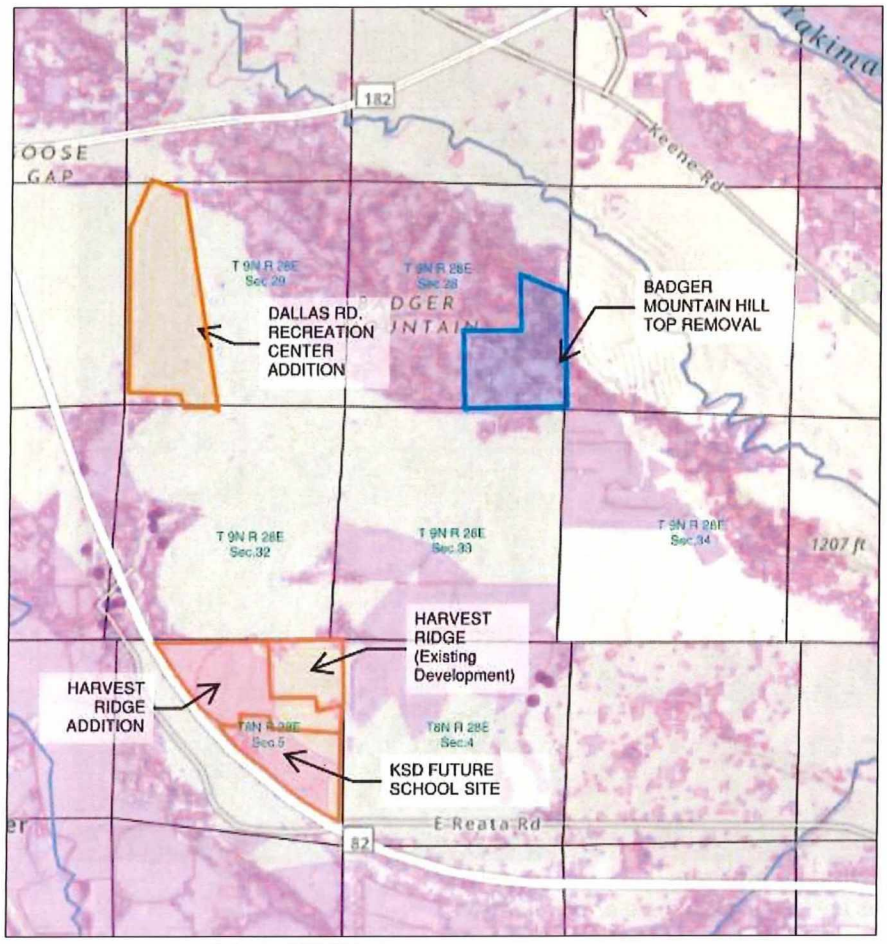


Exhibit C: WDFW Mapped Habitat Areas with annotations (Prepared 11/25/25)



Exhibit D: Drone Photograph with annotations
(Prepared 11/25/25*; Boundaries and Sites shown are approximate*)

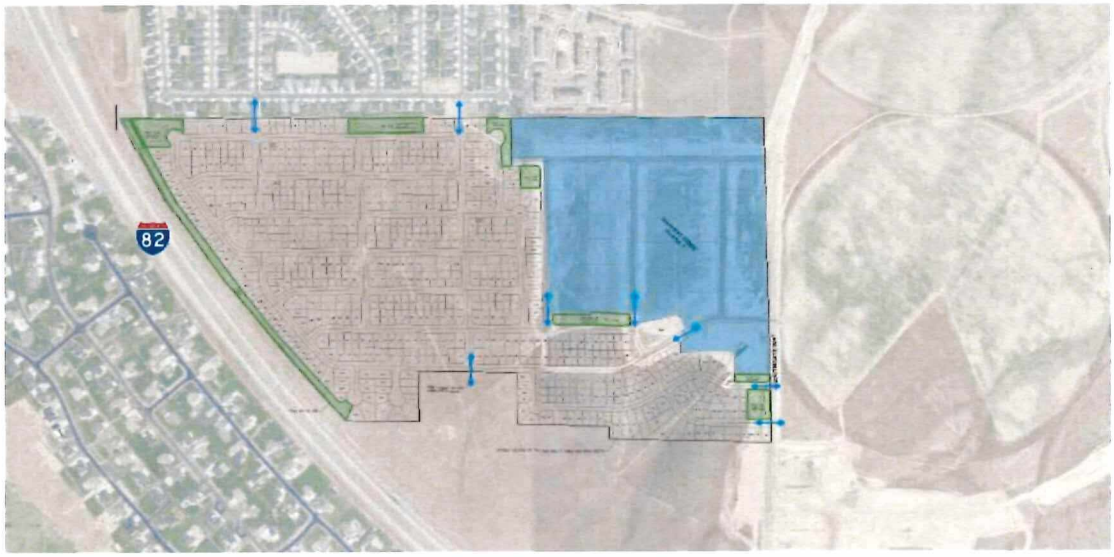


Exhibit E: Harvest Ridge Addition Concept
(Prepared 11/25/25*)*
Note: This is a very preliminary conceptual example demonstrating that the standard of a min. 6 DU/ acre can be achieved; the image shows 611 lots, potential open space areas, and a potential vehicular circulation approach)

3. What is the current use of the property proposed for inclusion in the UGA:

Harvest Ridge Addition	Vacant/ farm production, with an approved preliminary plat for residential construction and use
Dallas Road Recreation Center Addition	Farming
Harvest Ridge (2024 Subdivision)	Single Family Residential / Vacant
KSD Site	Farming

In addition, the current use of the Badger Mountain Hill Top area (requested UGA removal property) is Natural Open Space/ Recreational Trail.

4. What is the existing comprehensive plan designation for the area in which the property proposed for inclusion in the UGA:

Harvest Ridge Addition	RL-1 (Benton County Comprehensive Plan)
Dallas Road Recreation Center Addition	RL-5 (Benton County Comprehensive Plan)
Harvest Ridge (2024 Subdivision) site	RL-1 (Benton County Comprehensive Plan)
KSD Site	RL-1 (Benton County Comprehensive Plan)

In addition, the existing comprehensive plan designation of the Badger Mountain Hill Top area (requested UGA removal property) is Natural Open Space (per the Richland Comprehensive Plan Land Use map).

None of the lands have been designated as Agricultural Lands of Long Term Commercial Significance (ALLTCS). None of the lands are within Shoreline jurisdiction.

5. What is the City's proposed land use designation of the property proposed for inclusion in the UGA:

Harvest Ridge Addition	MDR - Medium Density Residential
Dallas Road Recreation Center Addition	CR - Commercial Recreation
Harvest Ridge (2024) Subdivision site	LDR - Low Density Residential
KSD Site	PBF- Public Facility

6. What are the reasons for the requested amendment and include substantial information why the provisions, map designations, etc., of the adopted plan are not sufficient to satisfy the concern that gives rise to the amendment request:

Harvest Ridge Addition	The property is currently vacant, but has land use entitlements for an approved Preliminary Plat with homes at a 1-acre minimum lot size. The owner would prefer to instead bring the property into the city limits and develop at a much more dense and compact scale. Doing so will support the city's objectives (and mandated

	requirements under the GMA as recently revised) to ensure land is available which is zoned to accommodate housing development that could be attainable to households earning around or below the Average Medium Income (AMI) for the region.
Dallas Road Recreation Center Addition	With the direct frontage along Dallas Road (and good access to I-82), proximity to existing neighborhoods, recreational amenities (including the Badger Mountain Centennial Park), unique location adjacent to city limits on the north and south sides, and infrastructure ready to be extended, the designation of RL-5 (Residential, Low - 5 acre lot minimum size) no longer fits in with the best use and potential of the property. Instead, future aspirations for the property include the development of a year-round sports recreation facility including outdoor multi-use sports fields (soccer, football, lacrosse etc.), softball fields, baseball fields and an indoor sports facility that may include basketball, volleyball etc. Other amenities may include concessions, restrooms, and an amphitheater. Parking in clusters throughout the facility will be included with pathways connecting all aspects of the complex. Open space will be integrated into the overall sport campus design, that will be accessible to the patrons of the facility. Park amenities are to be included throughout the design. Lodging components such as a hotel, groups of nightly rental bungalows, and an RV campsite complex are also envisioned for later stages per market demand, together with a potential restaurant and winery tasting room. This project would employ up to 25 full time staff and over 100 part time staff depending on season and event schedule in the near term. Later, with additional amenities and hotel capacity, these number will grow.

7. Include any other substantiated information that you feel is necessary or relevant for consideration:

The City of Richland has a proven track record of taking a measured and prudent approach when it comes to UGA expansion requests.

- Richland adopted its first Comprehensive Plan prepared under the state Growth Management Act in 1998, and the plan included the UGA boundaries for the city.
- Significant updates occurred in 2008, including adjustments to the UGA boundaries by Benton County to accommodate increased population and development needs. Most significantly, his included the addition of what is now the Badger Mountain South master planned development site which has had steady development.
- Further expansion of the UGA occurred in 2017, limited to lands north of the city limits, which are former federally-owned and control lands that are for industrial

purposes (with no residential capacity added).

- For the 2026 Periodic Update, it is necessary for the city to meet the establish population / housing targets including the income band requirements as established by Commerce's "Housing for All Planning Tool" and while infill development and potential downtown redevelopment will be useful to achieving these requirements, some additional land area for growth where utilities, services, and infrastructure is available is sensible and good planning.

    - The GMA requires comprehensive plans to include a housing element that identifies a "sufficient capacity of land" to accommodate all projected housing needs during the 20-year planning period (RCW 36.70A.070(2)(c)).
    - With recent changes to state law, Richland now must supply a detailed review of capacity among four categories: moderate, low, very low, and extremely low-income households, as defined in RCW 36.70A.030. The income level is relative to "median household income adjusted for household size, for the county where the household is located, as reported by the United States department of housing and urban development."
    - To evaluate residential land capacity by income level, AHBL will use the 6-step process as outlined by the Department of Commerce's Guidance for Updating Your Housing Element (August 2023) with adjustments to address concerns raised to the Growth Management Hearings board over an analysis following this general model conducted in Mercer Island, Washington. This is forthcoming.
    - The income level is relative to "median household income adjusted for household size, for the county where the household is located, as reported by the United States department of housing and urban development." The Department of Housing and Urban Development (HUD) publishes Area Median Income (AMI) for each county (or market area which may include several counties) on an annual basis. The AMI for FY 2025 is $105,600.
    - Benton County has set out the specific housing unit requirements for Richland and the other Benton County jurisdictions according to income band, consistent with the Housing for All Planning Tool (Commerce Guidance) as part of the update to the County-Wide Planning Policies.
    - The City of Richland is allocated housing growth targets (from the year 2020 to 2046) according to income level bands that use the "Average Median Income" benchmark
    - The 2020 "existing" distribution count was provided by the State Dept of Commerce via their "Housing for All Planning Tool" or HAPT.
    - By the year 2046 the City is expected to have 39,770 total housing units, including permanent housing units and temporary housing units / beds (emergency housing), which would be distributed as shown:

Permanent Housing Units by Income Level (% of AMI)

	0-30%							
	PSH	*Non-PSH*	> 30-50%	> 50-80%	> 80-100%	>100-120%	>120%	**Total**
Est. Housing Supply (2020)	0	798	2,690	9,796	4,469	3,275	4,497	**25,525**
Allocated Growth Target (2020-2046)	1,130	1,789	2,817	1,988	1,092	1,237	4,102	**14,155**

Emergency Housing Units

	Beds
Est. Supply (2020)	38
Allocated Growth Target (2020-2046)	52

PSH = Permanent Supportive Housing

The City of Richland has reached a 70% build-out and needs a limited amount of additional lands to accommodate the twenty-year population projection.

- The CWPPs at Policy #4 identify a uniform formula for assessing land needs in the County on a per capita basis and applies a 70% build-out factor to residential lands.
- The Dallas Road Recreation Center UGA expansion request is for non-residential uses and therefore this criterion does not apply. Furthermore, the increase of the acreage is largely offset by the proposed decrease of acres at the Badger Mountain Hill Top removal site.
- This criterion applies to the Harvest Ridge expansion request and the inventory sheet demonstrates the 70% build out is achieved.

The purpose of the proposed UGA removal and additions are primarily intended to better align with the City's objectives and obligations for growth under the Growth Management Act.

1. Increased land for housing supply is needed where higher densities (as compared to typical, single-family development on large lots) can be achieved, and where the neighborhoods can be built in a compact fashion. Furthermore, it is important to increase flexibility in housing types and promote the introduction of middle housing. The Harvest Ridge site would accommodate 611 lots for this type of development, creating an opportunity for the city to fulfill its requirements for 611 or more homes to be built in the forthcoming 20-year period to be offered at a rate attainable to households earning below the AMI.

2. The Harvest Ridge Addition site is located in close proximity to other residential development, will fill in the space between existing residential development and the I-82 right of way (which creates a physical barrier), and can be characterized as a suitable and logical site for the increased use due to the presence of existing water, sewer, electric, and transportation infrastructure that can be readily extended. In this way, the project meets the intent and directives of the GMA to reduce sprawl

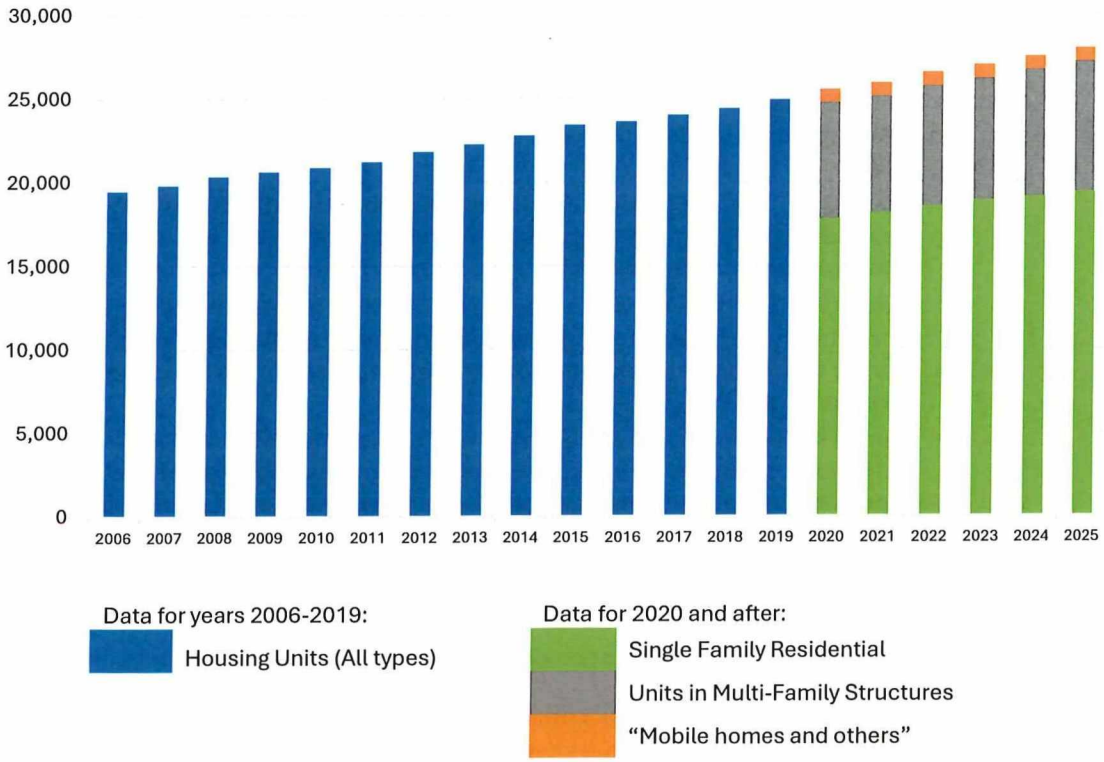
and also to avoid costly extension of infrastructure that would have fewer efficiencies elsewhere.

3. The Dallas Road recreation center site is uniquely well-suited for inclusion in the UGA; situated such that it already abuts city limits to the north and south sides; Badger Mountain is a physical barrier to the east. This site is additionally in close proximity to residential development, and will abut Dallas Road which is a minor arterial. Existing water, sewer, electric, and transportation infrastructure are in place in close proximity which can be readily extended as described in the Capital Facilities Plan.

Conditions have changed since the time and circumstances of the last County Plan adoption and the existing adopted provision is no longer appropriate.

- Benton County and its cities have experienced sustained and significant growth over the past several decades. In light of these changing conditions, it is reasonable to expect that some refinements to UGA boundaries are warranted.
- The City's UGA was last adjusted in 2017 to extend the boundaries to the north, for industrial uses and non-residential land supply increases.
- Richland has seen a steady increase in housing unit supply year-over-year. New housing production did not slow down during the 2009-2011 economic downturn and does not appear to have been negatively impacted by the health crisis of 2020-2021.
- In the year 2025, OFM estimates there are 19,374 housing units in single family homes, 7,789 homes in multi-family structures, and the inventory of "mobile homes and others" is 803.

City of Richland Housing Unit Inventory
2006 - 2025



The proposed amendment is consistent with Chapter 36.70A RCW (Growth Management Act), Benton County Code, the County-wide Planning Policies, and Plan policies.

The proposed amendment is supported by a Capital Facilities review, a land capacity analysis, and the City has demonstrated the need and preference for the change. There are many ways that the proposed amendment is consistent with Chapter 36.70A RCW, Benton County Code, the County-wide Planning Policies, and Plan policies and we are not aware of any inconsistencies.

The proposed change is particularly consistent and in alignment with the following CWPPs (emphases added):

1. *Policy #1:* The Comprehensive Plans of Benton County and each of the cities therein shall be prepared and adopted with the objective of **facilitating economic prosperity by accommodating growth** consistent with the following... *[lists the GMA goals]*
2. *Policy #3:* Locating Urban Growth Areas within the County shall be accomplished using accepted planning practices which provide sufficient land and service capacity, up to the determined need, to meet projected populations at urban densities and service standards within the Cities, and urban densities for those portions of the County located within the urban growth areas.
3. *Policy #5*: Within the urban growth area**, urban uses shall be concentrated in and adjacent to existing urban services** or where they are shown on a Capital Improvement Plan to be available within 6 years.
4. *Policy #6:* Cities will limit the extension of service district boundaries and water and sewer infrastructure to areas within each jurisdiction's urban growth area contained in their adopted Comprehensive Plan. Utility plans should attempt to reflect possible needs for a minimum of 20 years.
5. *Policy #8:* Consider other variables, such as **existing unused service infrastructure**. Also, avoid placing an urban growth line into an area of designated resource lands.
6. *Policy #9:* **Appropriate lands for urban growth expansion are typically those unincorporated lands with existing service infrastructure adjacent to corporate limits**.
7. *Policy #15:* ... All **jurisdictions shall seek to create the conditions necessary for the construction of middle, accessory dwelling units (ADU) and other housing, at the appropriate densities** within the cities and County, including UGAs....
8. *Policy #16*: Urban growth areas may include territory located outside of a city if such territory may be characterized by **urban growth or is adjacent to territory already characterized by urban growth**. Within urban growth areas, **only urban development may occur**.
9. Policy #18: Comprehensive Plans shall jointly and individually support the County and region's economic prosperity in order to **promote employment and economic opportunity for all citizens consistent with the protection of public health, safety, welfare, and the use of natural resources on a long-term sustainable basis, the ability of service capacity to accommodate demands, and the expressed desires of each community...**

Environmental impacts have been disclosed and measures imposed to either avoid or mitigate said impacts.

The City has prepared a SEPA Environmental Review checklist for the non-project action, and additionally listed out known environmental attributes and features of the

sites. A DNS was issued on November 19, 2025 (SEPA Register #202504889.

The sites feature minimal critical areas, and the impacts of future development (residential neighborhood and a Recreation Center) will not be intensive, intrusive, or cause harm to the surrounding land uses.

Please see the SEPA Environmental Review materials for further information.

The City has prepared a Capital Facilities Plan for the proposed UGA Changes. Consistent with the RCWs, the CFP shows generally that the city has, or will have, the resource capacity and capital infrastructure that is necessary for build-out of the entire area that is to be added to the UGA, without adverse effect on its ability to provide service to undeveloped areas within the current UGA.

Please see the Capital Facilities Plan.

Mayor Signature	Printed Name	Date
Authorized City Representative	Printed Name	Date

ANY INFORMATION SUBMITTED TO THE BENTON COUNTY PLANNING DIVISION IS SUBJECT TO PUBLIC RECORDS DISCLOSURE LAW FOR THE STATE OF WASHINGTON (RCW CHAPTER 42.17) AND ALL OTHER APPLICABLE LAW THAT MAY REQUIRE THE RELEASE OF THE DOCUMENTS TO THE PUBLIC.

An application fee of $2000.00 must be submitted with this application. This fee is non- refundable. Please make check payable to Benton County Treasurer.

APPLICANT'S CHECKLIST FOR COMPLETENESS

☒ APPLICATION FORM COMPLETED AND SIGNED WITH REQUIRED FEES

☒ CITY COUNCIL ADOPTED UGA RESOLUTION

☒ MAPS AND AERIAL PHOTOS WITH REQUIRED INFORMATION

☒ UGA INFORMATION SPREADSHEET

☒ CITIES SEPA CHECKLIST, DETERMINATION, OR EIS IF REQUIRED

☒ CAPITAL FACILITIES PLAN AS REQUIRED BY RCW 36.70A.070(3) & RCW 36.70A.03

(residential neighborhood and a Recreation Center) will not be intensive, intrusive, or cause harm to the surrounding land uses.

Please see the SEPA Environmental Review materials for further information.

The City has prepared a Capital Facilities Plan for the proposed UGA Changes. Consistent with the RCWs, the CFP shows generally that the city has, or will have, the resource capacity and capital infrastructure that is necessary for build-out of the entire area that is to be added to the UGA, without adverse effect on its ability to provide service to undeveloped areas within the current UGA.

Please see the Capital Facilities Plan.

Theresa A Richardson	Theresa Richardson	November 26, 2025
Mayor Signature	Printed Name	Date
	Jon Amundson	11/26/2025
Authorized City Representative	Printed Name	Date

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Appendix R
Comment and Response Matrix

Benton County Comprehensive Plan and Critical Areas Code – Final Comment Response Matrix (October 23, 2026)

Comment No.	Commenter	Section No.	Page No.	Comment	Response
Comments on County Comprehensive Plan					
1	Department of Energy (DOE) 7/17/2026	1.2.1, Alternative 1	13	Recommend that language describing renewable energy projects on Hanford not use the word "allowable" in this context. Instead, update wording to reflect that DOE itself may allow renewable energy projects to be developed on Hanford: "In addition, the U.S. Department of Energy may also allow renewable energy projects to be developed on the Hanford Site, which would be evaluated through the NEPA process. Basis - The current wording may be interpreted as allowing or disallowing the development of renewable energy projects on the Hanford Site, which is outside the scope of the EIS.	Update as suggested
2	Department of Energy 7/17/2026	Section 1.2.1, Page 13, Alternative 1		Recommend that language describing renewable energy projects on Hanford not use the word "allowable" in this context. Instead, update wording to reflect that DOE itself may allow renewable energy projects to be developed on Hanford: "In addition, the U.S. Department of Energy may also allow renewable energy projects to be developed on the Hanford Site, which would be evaluated through the NEPA process. Basis - The current wording may be interpreted as allowing or disallowing the development of renewable energy projects on the Hanford Site, which is outside the scope of the EIS.	Update as suggested
3	Ag Reserves Jens Rasmussen 7/2/2026			• We appreciate the work you have completed on the 2026 Comprehensive Plan Update and are generally supportive of the proposed changes. • We support the proposed redesignation of agricultural lands to industrial and commercial uses in southern Benton County where those areas are adjacent to existing industrial and commercial development. These changes are consistent with existing land use patterns and economic development opportunities and will allow development activities that can further enhance and support the agricultural economy of the area.	Thanks for the feedback - Comment noted
4	KID Daniel Tissell 11/10/2025	1.2.1, 1.5.4, Table 3-4, , 3.3.6, Alternative 1	13, 19, 59, 76-77	The "Unclassified" zoning district has no definition. As a zoning district that's wholly on the Hanford Site, it should be described as such and noted that it is governed by the Department of Energy and it's regulations. Basis - The current wording may be interpreted as allowing or disallowing the development of renewable energy projects on the Hanford Site, which is outside the scope of the EIS.	Purpose statement will be added to the Comprehensive Plan to note that this designation only applies to Hanford and is governed by US Department of Energy and its regulations for federal activity and by County regulations for state, local and private activity that require local permits and approvals.
5		Goals and Policies 2.2.3 Rural lands Policy 8	26	Add “and other traditional uses” at end	Update as suggested
6		General Policies 2.4.1 Policy 6	28	Add “while keeping urban heat island affect” at end	Update as suggested

Comment No.	Commenter	Section No.	Page No.	Comment	Response
7		2.4.2 Municipal Water Supply Policies Policy 3	29	Add “and require where available” at the beginning after the word Encourage Add a new policy in this section that says: Encourage the development of new and additional non-potable sources for irrigation water in housing units, parks and other developed lands or future developable lands.	Update as suggested
8		2.4.5 Agriculture Policies Policy 2	30	Add “non-potable uses in urban areas” at end	Update as suggested
9		2.4.5 Ag Policies – Policy 4	30	Add “Specifically, encouraging replacement water for KID from water lost due to upstream conservation and modernization.” at the end	Update as suggested
10	KID July 2,2026	2.4.5 WR Goal 2	30	Add new policy below policy 1 that says – “No new wells in the shallow aquifer.”	Update to read: Prohibit development that includes new wells in the shallow aquifer without associated water supply mitigation."
11	KID 11/10/2025	2.5 Critical Areas Goal 4 Policy 2	33	Put the word “natural” before creeks	Update as suggested
12		2.8 Transportation Element Goal 2 Policy 3	38	Put “Coordinate with local Irrigation Districts to Canal ROWs for trail purposes.” at end	Update to read: “Include local resident needs for pedestrian, bicycle, and recreational, and equestrian travel when those needs are identified in the Comprehensive Plan. Coordinate with local Irrigation Districts when considering Canal ROWs for trail purposes.”
13		2.9 Parks, Rec, Open Space Historic Preservation Goal 1 Policy 4	39	Add “Coordinate with local irrigation districts to Canal ROWs for trail purposes” at end	Update to read: Offer a broad range of recreational opportunities for various abilities and needs of County residents (e.g., fishing, hiking, playfields). Coordinate with local Irrigation Districts when considering Canal ROWs for trail purposes.”
14	WA State Department of Commerce Chaz Bates August 12, 2026	Section 1.1.2	11	Section 1.1.2 repeats the goals of the GMA. It is slightly out of date as it uses older language for the housing goal, in 2023 the housing goal had a significant change to read: “Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.”	Update Housing Goal (4) to read: “Plan for and accommodate housing affordable to all economic segments of the population consistent with County/Cities housing allocation plan. Promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.”
15		Section 2.10, Goal 1, Policy 1	43	Section 2.10, Goal 1, Policy 1 creates a different requirement from statute. RCW 36.70A.070(3)(e) requires a reassessment of the land use element if probable funding falls short of meeting existing needs. Your policy requires a reassessment of the capital facilities plan if funding falls short of meeting existing needs. and to ensure that the land use element, capital facilities plan element, and financing plan within the capital facilities plan element are coordinated and consistent. While this policy may arrive at the same goal: a coordinated and consistent capital facility plan and Land Use Element, a key difference appears that the proposed policy requires additional funding or reduced LOS vs a change in land use. A potentially higher bar with greater impacts to residents and the county.	Replace Policy 1 of this section with: “Reassess the land use element if probable funding falls short of meeting existing needs. Establish associated procedures for reviewing and updating the land use element and capital facilities plan to be consistent if probable funding falls short of meeting existing needs.”

Comment No.	Commenter	Section No.	Page No.	Comment	Response
16		Section 2.12.3, CE Goal 4, Policy 12	48	Section 2.12.3, CE Goal 4, Policy 12, working with the Benton County Conservation District on native plant species to increase resilience and reduce maintenance costs and demand for irrigation water is forward looking. You may consider impacts of climate change impacts on existing plant lists. It's possible that as the climate changes, existing native plants may not be the best long-term solution. Ensuring that any plant list is adaptable and considers changes to the climate could also save maintenance and demand for irrigation water.	Update Policy 12 of this section to read: "Work with the Benton Conservation District to develop and periodically update acceptable native and other drought resistant plant species for new developments and restoration projects, to increase resilience and reduce maintenance costs and demand for irrigation water."
17		Section 2.12.8, Goal 3, Policy 11.	52	Section 2.12.8, Goal 3, Policy 11. At the end of the sentence are the words "Waste Management" this is likely supposed to be a heading for the next section.	Thank you for pointing this out; you are correct and this will be updated to be a section heading in the final draft.
18		Section 2.7, Goal 1, Policy 3	37	Section 2.7, Goal 1, Policy 3 could be strengthened by expanding beyond just city limits to include adjacent UGAs to city limits. This would allow the county in conjunction with their cities to work cooperatively to provide the conditions necessary for the construction of affordable housing at appropriate densities within the city and adjacent urban areas.	Update this policy to read: "Work with Cities to provide housing for all economic segments of the population and seek to create the conditions necessary for the construction of affordable housing at appropriate densities within city limits and UGAs."
19				We support the inclusion of the Parks and Recreation Element into the comprehensive plan and the recognition of the tie between the element and the county's Parks Plan. We would like to point out that the Resource Conservation Office RCO may extend eligibility for cities and counties that combine parks, recreation, and/or open space planning into required periodic updates under the Growth Management Act. To qualify, the organization must submit a request for extended eligibility in writing to RCO. If approved, extended eligibility expires on the date the organization is required to adopt its updated comprehensive plan established under Revised Code of Washington 36.70A.130.	Thank you for pointing this information out to the County.
20	Bill Barlow 5/27/2026 Public Meeting			To date looks like Benton County is attempting to go beyond just meeting requirements	Comment noted
21	WDFW Scott Downes 6/11/2026	Chapter 2. Goals and Policies 2.2 Land Use LU Goal 1	23	Chapter 2. Goals and Policies 2.2 Land Use LU Goal 1. We recommend adding fish and wildlife habitat and wildlife connectivity as stated goals in review of land use compatibility.	Update as suggested
22		2.2.4 Master Plan Resorts LU Goal 7	26	We recommend adding in a policy that states where development overlaps with critical areas, prioritize placement of the critical areas into natural open for protection of the critical areas. (Comment also added by Laurie Ness on July 2, 2026)	Add new policy (7) to read: "Where development overlaps with critical areas, prioritize placement of the critical areas into natural open space through conservation easement or other permanent protection mechanism."
23		2.9 Parks, Recreation, Open Space, and Historic Preservation	40	We appreciate that Goal 2 has highlighted protection of greenways and open space along the riverine corridor of the lower Yakima River and Goal 3 identifies conservation of naturally vegetated slopes and ridges, both goals will provide important habitat protection. While both goals discuss habitat protection as a policy, neither goal speaks directly to protection of shrubsteppe habitat for upland wildlife. We recommend modifying one of the goals to address shrubsteppe habitat or adding an additional goal.	Update as suggested

Comment No.	Commenter	Section No.	Page No.	Comment	Response
24		2.12.3 Climate and Greenhouse Gas Emissions Goal 4	45	The resiliency sub-element of RCW 36/70A. 070 (9) (e) states that the climate element should identify, protect and enhance natural areas to foster resiliency for safe passage of species migration. We recommend adding wildlife connectivity under CE goal 4 to incorporate this element.	Update as suggested
25	**Land Use Comments**				
26	WDFW Scott Downes 11/14/2025 WDFW	3.2.3 Land Use Element Future Considerations	57-58	We recommend adding to plan for wildlife connectivity, particularly in the rural areas. Examples of planning could include adding wildlife connectivity corridors into open space plans, future land use maps, and even creating a wildlife connectivity overlay. There are some areas that are zoned as Rural 5 that are within wildlife connectivity corridors identified under various elements such as WAHCAP or PHS. We would like to explore if there are options to rezone some of these areas to less intensive zoning such as agriculture or Rural 20.	DRAFT Response: Wildlife Connectivity is addressed at the county and regional scale. The County's open space mapping identifies connectivity corridors of county and regional significance and supports strategic preservation of high-value open space properties, including through the shrubsteppe mitigation program relies on these corridor-scale tools rather than a parcel-scale regulatory overlay. The County will monitor development trends during plan implementation over the next few years in and around wildlife connectivity corridors and see whether zoning changes might be warranted in certain areas.
27	Department of Energy 6/17/26	3.2 Existing Land Uses in the County Second Paragraph	53	Recommend changing the reference to "Hanford industrial uses" to "the Hanford Site." Basis - The current language implies that the entire Hanford Site is used for industrial purposes. While outside the scope of the BCCP, the Hanford Site land use designations include several other categories aside from industrial	Update as suggested
28		3.2.2 Population and Land Use Trends, Last Paragraph	57	The report states that, "A solar renewable energy project is located on this land and additional future development is expected," however to date there has not been any development on the 1,641 acres of Hanford land that was transferred to the community reuse organization. Basis - The 1,641 acres of DOE land transferred to TRIDEC remains undeveloped. The only solar farm is located to the SW of the 1,641 acres on private land owned by the IBEW.	Update to clarify and correct with the accurate information
29	Benton County Public Works July 2, 2026	3.3.1.1 Urban Growth Area Amendment Request (City of Richland)	59-60	Thank you for the opportunity to review and provide comments on the City of Richland's request to adjust the Urban Growth Area (UGA) within Benton County. Public Works comments are as follows; ✓ RCW 35.21.790 (1) states "The governing bodies of a county and any city or town located therein may by agreement revise any part of the corporate boundary of the city or town which coincides with the centerline, edge, or any portion of a public street, road or highway right-of-way by substituting therefor a right-of-way line of the same public street, road or highway so as fully to include or fully to exclude that segment of the public street, road or highway from the corporate limits of the city or town." ✓ The County is requesting that the legal description included in the request for the Urban Growth Area amendment be revised to include all adjoining portions of county roads that will be impacted by all future annexed properties / parcels. Development of these properties / parcel when annexed by the City will need to meet City of Richland construction specification and standards	This comment will be shared with the City of Richland

Comment No.	Commenter	Section No.	Page No.	Comment	Response
30	Benton County Public Works July 2, 2026	3.3.1.1 Urban Growth Area Amendment Request (City of Benton City)	59-60	RCW 35.21.790 (1) states "The governing bodies of a county and any city or town located therein may by agreement revise any part of the corporate boundary of the city or town which coincides with the centerline, edge, or any portion of a public street, road or highway right-of-way by substituting therefor a right-of-way line of the same public street, road or highway so as fully to include or fully to exclude that segment of the public street, road or highway from the corporate limits of the city or town." ✓ The County is requesting that the legal description included in the request for the Urban Growth Area amendment be revised to include all adjoining portions of county roads that will be impacted by all future annexed properties / parcels. Development of these properties / parcel when annexed by the City will need to meet City of Benton City construction specification and standards.	This comment will be shared with the City of Benton City
31	WA State Dept. of Commerce Chaz Bates August 12, 2026			Section 3.3.1 provides a good summary that the comprehensive plan allows growth within UGAs and the UGAs are designed to accommodate growth and be in areas that that either already have adequate existing public facilities and service capacity or can be served by such facilities and services. The Benton City and Richland proposed UGA expansion applications appear to follow Policy 4 of the Countywide Planning Policies and acknowledge the ability to serve the expansions. However, the County has an additional obligation to review the expansions considering all existing urban growth areas within the County including capacity within cities. One example that is absent from a countywide level discussion is the City of West Richland's Lewis and Clark Ranch subarea. Though West Richland has considerable undeveloped acreage within the city, it is also highly unlikely that those areas outside of the Lewis and Clark Ranch could be provided with the necessary capital facilities within the 20-year planning period. The County as part of the overall discussion of the UGA and potential expansion should strike the balance not only having adequate land capacity but also the capacity to have adequate public facilities and services within the 20-year planning horizon. Additionally, if the County intends to use "UGA swaps" during this periodic update to modify UGA boundaries, please be aware the provisions within RCW 36.70A.130(3)(c) must be satisfied.	See White Bluffs Consulting Memorandum dated September 24, 2026 for additional detail on the proposed UGA changes and associated Countywide evaluation of land capacity and other factors that went into supporting the proposed Benton City and Richland UGA changes. *(NOTE: This memorandum can be found as part of the Planning Commission October 6, 2026 hearings packet.)*
32				We have an overarching concern about several of your proposed land use designations and the potential of misclassifying/ identifying limited areas of more intensive rural development (LAMIRD). We have concerns that the County has removed or never appropriately designated LAMIRDs throughout the County, based on conversations with staff it appears that LAMIRDs were never designated. As proposed, the Rural Commercial, Rural Transition, and Rural Industrial and their associated implementing zoning districts allow development that appears inconsistent with rural areas generally. Allowing these designations and zones to newly occur throughout the rural area conflicts with Goal 2 and Goal 8 of the GMA. The overall suggestion is for the County to limit new occurrences of the Rural Commercial, Rural Transition, and Rural Industrial and their implementing zoning districts, and consider either in this plan or future amendments designating LAMIRDs consistent with RCW 36.70A.070(5)(d) or other mechanism as appropriate to limit the conversion of rural lands to non-rural uses.	Update the following comprehensive plan sections: **2.2.1 Urban Growth** Update Policy 1 to read: "Reduce urban sprawl and preserve rural character by promoting urban growth, including new urban-scale commercial and industrial development within designated UGAs and incorporated areas where adequate urban services such as public facilities, utilities, transportation infrastructure, and services are available or can be efficiently provided." **Land Use Element 3.2.3** Add sentence at the end of paragraph 3 – "While the County has legacy urban type development – residential, commercial and industrial in certain areas, the County is

Comment No.	Commenter	Section No.	Page No.	Comment	Response
					prohibiting the expansion or establishment of urban-scale commercial and industrial development outside Urban Growth Areas except as described in more detail in section 3.3.2.3." **3.3.2.3 Rural Land Use Designations** **Rural Transition** Add this sentence into this section: "The County is prohibiting the expansion or establishment of additional future Rural Transition designated and zoned lands effective with the adoption of the 2026 updated plan." **Rural Commercial** Add this sentence into this section: "The County is prohibiting the expansion or establishment of additional future Rural Commercial designated and zoned lands effective with the adoption of the 2026 updated plan." **Rural Industrial** Add this paragraph into this section: "The County is prohibiting the expansion or establishment of additional future Rural Industrial designated and zoned lands effective with the adoption of the 2026 updated plan for those lands located outside a designated UGA. **3.6 Expansion of Urban Growth Areas** Add discussion of Plymouth MID UGA establishment for Plymouth after discussion of Benton City and Richland UGAs. This additional information would read: "Also, the County has determined that state Major Industrial Development (MID) requirements established by RCW 36.70A.365

Comment No.	Commenter	Section No.	Page No.	Comment	Response
					would be met through the designation of a 1,297-acre industrial development site near Plymouth, as further documented in September 9, 2026 Memorandum (AC Geo). *(NOTE: This memorandum can be found as part of the Planning Commission October 6, 2026 hearings packet.)* Also, update Comprehensive Plan Table 3-4, Urban row, to include General Commercial, Light and Heavy Industrial as allowed uses. See also associated additional changes in Title 11, as provided with Comment #115 response.
Natural Resources Element Comments					
33	WDFW Scott Downes 6/11/2026	2.3 Natural Resources Element		Yakima Basin Integrated Plan Support. While WDFW has not seen a draft of the Natural Resources Element posted to the draft to the public website yet, we would like to offer up two concepts for Goals and Policies that support Lower Yakima River habitat restoration: 1. Support for Water Stargrass control in the Lower Yakima River to support river restoration and fish passage and survival. 2. Support for fish passage and habitat restoration projects proposed under the Yakima Basin Integrated Plan in the Lower Yakima River.	Update as suggested in WR Goal 4, Policy 1
34		4.6.5.1 Natural Resources Element, Critical Areas	105	Fish and Wildlife Conservation Areas, Existing Conditions. The opening paragraph states that many of the ephemeral streams do not provide aquatic habitat due to their infrequent flows. While it is likely that many of these stream reaches may not support various life stages of anadromous fish, particularly spawning, it is incorrect that these ephemeral reaches don't have the ability to support aquatic habitat. Species such as amphibians often use ephemeral stream reaches for parts of their life cycle and can be important to their survival. We recommend acknowledging that these ephemeral stream reaches can provide aquatic habitat to some species.	Update as suggested Update: Due to the arid nature of Benton County, many streams classified by mapping as streams are dry washes that follow topographic lows and only transport water during large runoff events. While these ephemeral channels generally do not provide persistent aquatic habitat, they may provide important season or intermittent habitat for certain species as part of their life cycle.
35	KID – 11/10/25 – Daniel Tissell	4.5.2.1.2 Natural Resources, Water Resources, Existing Conditions, Surface Water, Yakima River	91-92	Change the river flows east to west to **west to east** in the first sentence. Change sentence that says Lower Yakima flows are often lower in the summer than historical conditions, primarily **due to controlled reservoir releases for out of stream uses while maintaining minimum target flow for fish. In addition, conservation and modernization of irrigation systems reduces baseflows.** Change 2nd sentence in 2nd paragraph to: This condition **is concerning for** both the **resident** and anadromous fisheries	Update as suggested

Comment No.	Commenter	Section No.	Page No.	Comment	Response
36		4.5.2.2 Natural Resources, Water Resources, Existing Conditions, Ground Water	92	Add “Groundwater portions of the shallow aquifer adjacent to irrigation canals and irrigated lands are also impacted by modernization of irrigation systems and on-farm practices.” At end of page	Update as suggested
37		4.5.3.1 Natural Resources, Water Resources, Current Trends, Surface Water	93	Add “Basin” to Yakima Integrated Plan and on pages 68, 69 and 90 (global update) and add “Chandler electrification, a project that improved the Kennewick Irrigation District water supply, helps to increase water supply for irrigation and provides benefits to fish during drought and other times.” At the end of the 2nd paragraph.	Update as suggested
38		4.5.3.2 Natural Resources, Water Resources, Current Trends, Groundwater	94	Add “there is a mixed effect. Pumping water for irrigation can reduce groundwater elevation whereas irrigation distribution infrastructure and irrigated agriculture have increased the ground water elevation.” At end	Update as suggested
39		4.5.4 Natural Resources, Water Resources, Future Considerations and Water Management	94	Add “Chandler electrification, a project that improved the Kennewick Irrigation District water supply, helps to increase water supply for irrigation and provides benefits to fish during drought and other times.” At end of 1st paragraph.	Update as suggested
40		4.5.5.2 Natural Resources, Water Resources, Focus on the Yakima River Basin, Yakim River Basin Integrated Water Resource Management Plan	96	Add “and KID Chandler Electrification and Central Storage” at end	Update as suggested
41		4.5.5.4 Natural Resources, Water Resources, Focus on the Yakima River Basin, Rural Water Supply Program	99	Add “Irrigation districts” in last sentence	Update as suggested
42		4.6.1.1 Natural Resources, Critical Areas, Wetlands, Existing Conditions	100	Add “The County will coordinate with Irrigation Districts [on] intentionally created wetlands.” At end of 2nd paragraph	Update as suggested
43	Patrick Paulson Laurie Ness May 28,2026	4.6.1 Natural Resources, Critical Areas, Wetlands	100	• Add introductory text to section 4.6.1 Wetlands: • Wetlands help to maintain water quality; store and convey stormwater and floodwater; recharge groundwater; provide important fish and wildlife habitat; and serve as areas for recreation, education, scientific study and aesthetic appreciation. • The County's overall goal shall be to achieve no net loss of wetlands functions and values. This goal shall be implemented through retention of wetlands within the County.	Update as suggested Update: Wetlands provide important ecological and community functions. They help maintain water quality, store and convey stormwater and floodwater, and recharge groundwater.

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				• Wetlands and their buffers serve to moderate runoff volume and flow rates; reduce sediment, chemical nutrient and toxic pollutants; provide shading to maintain desirable water temperatures; provide habitat for fish and wildlife; and preserve the ecological integrity of the critical area and areas adjacent. The primary purpose of the wetland regulations is to avoid detrimental wetland impacts and achieve a goal of no net loss of wetland function and values, and where possible enhance and restore wetlands.	Wetlands and their buffers also moderate runoff, reduce sediment and pollutants, maintain desirable water temperatures, and provide habitat for fish and wildlife. They also support recreation, education, scientific study, and aesthetic appreciation. Benton County's overall goal is to achieve no net loss of wetland functions and values through the retention and protection of wetlands and their buffers.
44		4.6.1.1 Natural Resources, Critical Areas, Wetlands, Existing Conditions	100	• Acknowledge wetlands other than those "concentrated within the floodplain of the Yakima and Columbia rivers.". Suggested Language: 4.6.1.1 Existing Conditions • In addition to wetlands concentrated within the floodplain of the Yakima and Columbia rivers, Benton County contains isolated wetlands, wetlands linked to springs, wetlands created from high groundwater levels due to irrigation, and wetlands created and regulated to compensate for the loss of other wetlands.	Update as suggested
Housing Comments					
45	WA State Dept. of Commerce Chaz Bates August 12, 2026	6.3		Section 6.3, regarding Table 6-7. Consider adding a discussion of explanation of how housing units are being allocated to the UGAs adjacent to the incorporated cities within Benton County. From the text and table, it is not clear whether these areas are included in the allocation numbers.	Housing units are not being allocated to the UGAs, only within the City or unincorporated rural areas (outside UGAs). This will be clarified in the text by noting that unincorporated rural areas excludes UGAs. Additional updates to the Housing element include: Correct a typo in Table 6-10 that shows an incorrect calculation of the surplus or deficit of production rate compared to need (to read "32"). Add new section 6.4.5 to clarify the County has no funding gaps or incentive needs for addressing affordable housing in rural areas. "6.4.5 Affordable Housing Funding Gaps Benton County's allocation of countywide housing needs for unincorporated areas is exclusively limited to housing needs for >80% AMI. The review of historic production trends summarized in Table 6-10 shows that the market is already providing more than

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					enough manufacture homes and ADUs to meet moderate-income (>80-120% AMI) housing needs in rural areas. Therefore, there is no need for additional funding or incentives to support affordable housing production in unincorporated Benton County. However, the county could work with cities to adopt local option funding tools to support new affordable housing production in cities. For instance, the county could implement a Housing and Related Service Sales Tax (RCW 82.14.530)." Update the last paragraph of Section 6.5, Racially Disparate Impacts to read: "The County reviewed policies to ensure they didn't include any harmful bias associated with any groups or didn't result in racially disparate impacts, displacement, and exclusion in housing. The Housing Goals and Policies section was updated and included new goals and policies to address racially disparate impacts such as displacement of housing due to planning, disinvestment, redevelopment, etc. Policies to provide a variety of housing types will also act to mitigate displacement and disparate impacts. Policies include the following key principles to address racially disparate impacts, displacement, and exclusion in housing: ▪ Provide a variety of housing types throughout the county, with specific housing types appropriate for rural areas and urban areas ▪ Urban areas to accommodate housing types for moderate, low, very low, and extremely low income households ▪ Allow higher density housing in LAMIRD areas ~~mostly~~ within the

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					communities of Finley, Plymouth, Paterson, and Whitstran, land uses, when rural infrastructure is available ▪ Ensure zoning to support emergency, temporary, transitional and permanent supportive housing types ▪ Prevent discrimination and displacement in planning and investment decisions ▪ Collaborate with communities and agencies to understand and prevent displacement Additionally, Appendix E of Volume 2 will be updated with a displacement risk map for Benton County and associated explanatory text that reads: "Figure 65 indicates most of the displacements in Benton County occurring in the Kennewick, Richland and Finley area. Within the rural county, displacement is shown on the west side, from Whitstran area to the rural area on the north side of the county limits. Within Kennewick, Richland and Finley area, high risk of displacement is indicated mostly in north Kennewick, and moderate displacement risk is shown in portions in Richland. Rest of the urban area has low risk of displacement."
Transportation and Capital Facilities Comments					
46	WA State Dept. of Commerce Chaz Bates August 12, 2026	7.2.8		Section 7.2.8 includes a discussion about transportation demand strategies and there is a note that the section will be expanded to more specifically discuss TDM strategies from the Regional Transportation Plan, Transition 2045. This appears to be a note to add these in before final approval. Similarly, there is a note in Section 7.3.1 regarding multi-modal level of service standards.	See response to comment 61 and comment 55 below.
47	KID – 11/10/25 Daniel Tissell	7.4.1 Transportation Element, Planned Improvements and Financing, County	152 163-164	Recommend working with Irrigation Districts to create trails on canal ROW, also mentioned in section 8.2.3	Update as suggested in 7.4.2 Paths and Trails

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		Six-year Road Program 8.2.3 Parks and Recreation Element, Existing Conditions, Greenway Connections			
48		Table 9.1 Capital Facilities Element	176-179	Include Irrigation districts or is this a GMA?	Comment noted - Not required to include IDs at this time
49		Table 9.1 Capital Facilities Element Fire District 1 – rural water supplies	178	Add irrigation components (all locations)	Comment noted - Not required to include IDs at this time
50	WDFW Scott Downes 11/14/2025	2.8 Transportation Element Goals and Policies	37-39	Transportation Element: We recommend incorporating evaluation of wildlife connectivity into the goals and policies of the Transportation Element for transportation projects, both new and rebuilding, particularly for bridges and culverts in rural lands. The Washington Habitat Connectivity Action Plan (WAHCAP) provides rough guidance on where wildlife connectivity is important, and the PHS Biodiversity Areas and Corridors (BAC) is also recommended as a source. WDFW can provide support in guidance and recommend including consultation with WDFW into the Goal and Policy.	Update as suggested
51	Steve Gahn – 5/27/26 public open house comment			Since most of our emissions are from transportation, most of the emissions reduction will come from decarbonization of transportation. We applaud Benton County for engaging with BFCOG on the Regional Bicycle Plan. We note that the Climate Element in the Benton County Comp Plan calls for "expansion of reliable EV charging infrastructure." Benton County should encourage applications for Climate Commitment Act (CCA) grants for level 2 chargers for apartment buildings, and work with Ben-Franklin Transit, school districts and city governments to write CCA proposals to fund the infrastructure (chargers and substations) needed to charge fleets of transit buses, school buses, and city vehicles and equipment. These investments will greatly reduce the cost of powering transportation as well as reduce emissions of toxic and greenhouse-gas pollutants.	Benton County will support future grant applications consistent with its climate element.
52				Appreciate the coordination with BFCOG on regional bike plan. I would like to encourage grants for level 2 charging systems for apartment dwellers. Work with BF transit to help get funding for electric buses. Need more carbon-free electricity.	Comment noted and this comment also be shared with BFCOG.
53	Benton Franklin Council of Governments - 4/10/26	7	148	Transportation Element Consistent with relevant CPPs and RCW 36.70A.070(6) amended in 2023 by HB 1181. See also the new climate element below for jurisdictional requirements A. The transportation element must identify the transportation facilities, public facilities and services needed to serve the UGA and the funding to provide the transportation facilities and public facilities and services. RCW 36.70A.130 amended in 2022 (see SB 5593)	A reference to the Climate Element of the Comprehensive Plan was added to section 7.1 This requirement is addressed throughout the Transportation Element. Of note is that there are no current or forecast Level of Service deficiencies identified in the 10-year forecasts and evaluation shown in Appendix H2, H3.
54		7.2	148 - 154	B. An inventory of air, water, and ground transportation facilities and services, including transit alignments, state-owned transportation facilities, and general aviation airports. RCW 36.70A.070(6)(a)(iii)(A) amended in 2023 and WAC 365-196-430(2)(c). • Page 134-140, Figure XX of Existing Transportation Facilities Map	This inventory is now on pages 148-154 and Figure 15 of the Map Folio on the Appendix.

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55		7.3.1	155	C. Adopted multimodal levels of service (LOS) standards for all locally-owned arterials, transit routes, and state highways. RCW 36.70A.070(6)(a)(iii)(B) and (C), WAC 365-196-430 • LOS is stated, but no mention of the multimodal level of service • https://wsdot.wa.gov/sites/default/files/2024-08/MMLOS_guidance_Aug2024.pdf	A new paragraph was added to the bottom of section 7.3.1 that reads: "A new requirement to be included in the Transportation Element of Comprehensive Plans is Multi-modal Level of Service Standards (MMLOS), see RCW 36.70A.070(6)(a)(iii)(B). These standards are to apply to locally owned arterials, locally and regionally owned transit routes that serve urban growth areas, and active transportation facilities to serve as a gauge to judge performance of the system and success in helping to achieve the goals of the GMA. These standards are to be developed regionally. The BFCOG is in the process of establishing such MMLOS standards being developed. Benton County actively participates in the BFCOG processes at both the technical and policy level and commits to participating in this specific effort. Following the BFCOG adoption of MMLOS standards, Benton County will adopt such standards appropriate for county roads, prepare 10-year forecasts for multimodal demand and needs, and also identify specific actions necessary to meet those standards on locally owned arterials, transit routes and state highways. The only locally owned arterial roadways in urban growth areas of Benton County are: Badger Road, portions of Dallas Road and a portion of Olympia Street"
56		7.3.1	155	D. Identification of specific actions to bring transportation facilities and services to established multimodal LOS. RCW 36.70A.070(6)(a)(iii)(D), amended in 2023, WAC 365-196-430 • LOS is stated, but no mention of the multimodal level of service	See response to comment 55.
57		7.3.1	155	E. A forecast of multimodal transportation for a minimum of 10 years, including land use assumptions used in estimating travel. **RCW 36.70A.070(6)(a)(i)**, **RCW 36.70A.070 (6)(a)(iii)(E)**, amended in 2023, **WAC 365-196-430(2)(f)** • LOS is stated, but no mention of the multimodal level of service • https://wsdot.wa.gov/sites/default/files/2024-08/MMLOS_guidance_Aug2024.pdf	See response to comment 55.

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58		7.3.1, 7.3.1.1, Appendix H2, H3	155 – 156	F. A projection of state and local system needs to equitably meet current and future demand and equitably implement the multimodal network. **RCW 36.70A.070(6)(a)(iii)(F)** amended in 2023, **WAC 365-196-430(1)(c)(vi)** and **RCW 47.06** • Appendix H1	No Level of Service deficiencies have been identified in the next 10-year forecasts as reported in the analysis in Appendix H2, H3.
59		7.2.9	154	G. A transition plan for transportation as required in **Title II of ADA**. Perform self-evaluations of current facilities and develop a program access plan to address deficiencies and achieve the identification of physical obstacles, establish methods, perform modifications and identify leadership roles. **RCW 36.70A.070(6)(a)(iii)(G)** new in 2023. **Not mentioned**	A new section 7.2.9 was added that reads: " A new requirement for Transportation Elements, as of 2023, is an ADA Transition Plan as required by the Americans with Disabilities Act of 1990, that includes a self-evaluation of current facilities relative accessibility requirements of the ADA and a plan to address any deficiencies. Although Benton County has not as yet adopted an ADA Transition Plan, it has established an Accessible Community Advisory Committee and has begun the process to prepare and ADA Transition Plan."
60		7.2.7	154	H. An active transportation component to include collaborative efforts to identify and designate planned improvements for active transportation facilities and corridors that address and encourage enhanced community access and promote healthy lifestyles. **RCW 36.70A.070(6)(a)(vii)** amended in 2023, **WAC 365-196-430(2)(j)** • Page 146 – states BFCOG 2016 Regional Active Transportation Plan, instead of 2020. The BFCOG Bike Plan was adopted in 2024, and the Pedestrian Trails Plan was adopted in 2026.	References were updated.
61		7.2.8	154	I. A description of any existing and planned transportation demand management (TDM) strategies, such as HOV lanes or subsidy programs, parking policies, etc. **RCW 36.70A.070(6)(a)(vi)** and **WAC 365-196-430(2)(i)(i)** • Page 140 – if this is true, the County has been lacking in action. • There needs to be specific action steps outlined, such as which TDM strategies will be implemented when MMLOS/LOS drops on roadways.	Section 7.2.8 was rewritten as follows: "As discussed above, Benton County is an active participant in the BFCOG. The Regional Transportation Plan, Transition 2045, includes a section that discusses Transportation Demand Management Strategies. There is also a Congestion Management Process Strategy Toolkit that has TDM strategies appropriate for the region. ~~TDM strategies should be pursued before roadway LOS approaches or drops below adopted standards included in the Comprehensive Plan.~~ As members of BFCOG, all of these documents~~, and associated TDM strategies,~~ are adopted and

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					incorporated into the Benton County Comprehensive Plan by reference. These documents can be found on the BFCOG website. TDM strategies should be pursued before roadway LOS approaches or drops below adopted standards included in the Comprehensive Plan. Although there are no Tier 1 or Tier 2 Congestion Management Corridors in Benton County, some strategies can be implemented in Benton County that could assist in reducing congestion in the Tri-Cities region. By promoting other modes. These strategies include provision of pathways and trails, carpool and vanpool programs, as well as incentives for working remotely. It is also recognized that other strategies are more applicable to the urban areas and Benton County will continue to support efforts by the cities and large businesses to use other strategies such as flexible work hours and parking management.”
62		7.4.3	159	J. An analysis of future funding capability to judge needs against probable funding resources. **RCW 36.70A.070(6)(a)(iv)(A)**, **WAC 365.196-430(2)(k)(iv)** • Not included	The following statement was added to Section 7.4.3: “The Capital Facilities Element discussed in Chapter 9 of this Comprehensive Plan discusses the need to balance funding for capital facilities projects for transportation and parks to meet their associated Level of Service standards against other capital projects that do not have LOS standards. It discusses the relationship between land use and capital facilities, the Capital Improvement Program annual update process, project selection and LOS Standards, analysis of future development and siting of public facilities, as well as prioritizing public facilities projects and their financing and what will be considered when funding is not available.”

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63		7.4.1	158	K. A multi-year financing plan based on needs identified in the comprehensive plan, the appropriate parts of which serve as the basis for the 6-year street, road or transit program. **RCW 36.70A.070(6)(a)(iv)(B)** and **RCW 35.77.010**, **WAC 365-196-430(2)(k)(ii)** • Page 142 – mentions the TIP, it does not mention a multi-year financing plan.	The following statement was added to Section 7.4.1: "The current multi-year financing program for projects that are included in the Transportation Improvement Program (which is updated annually) that help to meet the requirements for capacity and multi-modal levels of service include: Badger Road re-channelization, County Route 12/Active Transportation path improvements, Adair Road Extension, Reata Road/Bermuda Road intersection improvements, Dallas Road multi-modal improvements, Two Rivers pathway extension."
64		7.4.3	258	L. If probable funding falls short of meeting identified needs of the transportation system, including state transportation facilities, a discussion of how additional funds will be raised, or how land use assumptions will be reassessed to ensure that LOS standards will be met. RCW 36.70A.070(6)(a)(iv)(C) amended in 2023, WAC 365-196-430(2)(l)(iii) • Not included	See response to comment 62.
65		7.5	160	M. A description of intergovernmental coordination efforts, including an assessment of the impacts of the transportation plan and land use assumptions on the transportation systems of adjacent jurisdictions and how it is consistent with the regional transportation plan. RCW 36.70A.070(6) (a)(v); WAC 365-196-430(1)(e) and 430(2)(a)(iii) • Page 144	Intergovernmental coordination efforts are discussed in sections 7.3.1, 7.3.1.1, 7.4.1 and 7.5
66	**Parks and Recreation Comments**				
67	WDFW Scott Downes 6/11/2026	8.4.1 Parks and Recreation, Future Considerations, Open Space Preservation	167	We appreciate the county's dedication to preservation of open space and the recognition that wildlife habitat is a stated goal under strategies to protect open space. We would welcome continued collaboration with the county on areas where we might be able to conserve critical wildlife habitat through the open space program, using both WDFW spatial mapping and local knowledge of species use.	Thank you for this support and opportunity for continued collaboration.
68		8.4.2 Parks and Recreation, Future Considerations, Key Capital Improvements to Meet Demands	168	Horn Rapids Park. As identified in the existing conditions for the park, riverine and shrubsteppe habitat is central to the park and provides critical wildlife habitat. We would recommend addition to this section to explicitly state that preservation and enhancement of these habitats within the park should be a goal of future improvements to the park.	Update as suggested
69	**Utilities Comments**				
70	Steve Gahn – 5/27/26 public open			Utilities Element: Because electrification of transportation and heating systems is so important, adding carbon-free electricity to our energy system is essential to achieving emissions reduction goals. Benton County is particularly well positioned to add carbon-free nuclear energy; this fact should be mentioned in the Utilities Element of the plan. Enhanced geothermal energy has been demonstrated to be	See Section 2.12.4, Policy 2, where carbon-free energy sources are identified for ongoing support.

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	house comment			economically viable across the western U.S. and should encouraged in Benton County by mentioning it in the Comp Plan. Solar energy should be encouraged on industrial land. Solar and wind power production should also be allowed on land that can supplement revenue for land owners. Wind and even solar power production can be compatible with ag production. As reported on Northwest Public Radio, a planned solar farm near Connell will also be used to graze sheep. The sheep rancher was excited to have land to rent, and the landowner was excited to have not just profitable solar power but also rent money coming in.	Benton County agricultural lands have taken a disproportionate share of impact with existing and proposed commercial-scale renewable energy projects and will continue to be excluded from agricultural lands of long-term commercial significance.
71	Citizen 5/27/26 Public open house			I'm from Sustainable Tri Cities and support the need for more electricity in the future and it is coming. We support clean energy. Hope the PUD is considering things. Storage batteries for energy. Software for load balancing? I hope there is a plan for power needs and additional data centers. There is a lot of concern about data centers and think state laws will protect us. People would like to see more transparency in those siting decisions. Solar and wind power on farms we support.	Comment noted and we encourage you to also share this input with Benton PUD
72	Citizen 5/27/26 Public open house			I like to see all of this regionalism on this for the climate element, and we are really trying to look at new opportunities. The regional approach to a lot of our problems is emerging. The energy piece feels new, and it is so integrated with economic development. Ben mentioned the shrubsteppe mitigation program wasn't required, but the county led out. We need all jurisdictions to come to agreement on electric vehicles. I don't see all the factors for quality of life and the local community that needs addressing and the data behind it. We appreciate the attitude that is going into these comprehensive plans	Comment noted
73	Debbie Berkowitz 5/27/26 Public Open house			Please consider ag and critical areas as part of least conflict parameters for future energy projects and coming up with a map that is in the document.	We did analysis and modified the memo but are not recommending an energy overlay. Commercial scale energy projects are addressed in the WSU least conflicts analysis. The County will use the information to inform EFSEC input.
74	Lora Rathbone Richland, WA July 2026			Benton County could be a clean and renewable energy production powerhouse. It doesn't have to mean taking valuable farmland: there is growing use of agrivoltaics, placement in areas of grazing, and other compatible uses. Farmers who can keep farming with the added income from wind and solar would be a way to keep farmland, rather than selling it to developers.	Comment noted
75				Please clarify what is meant by "quality of life for local communities" (Noisy data centers, higher power bills from inadequate infrastructure and energy production, ghg pollution- all reduce quality of life)	Quality of life discussion is sprinkled throughout the plan. Generally it means Benton County residents (living in the unincorporated area) enjoy a safe, prosperous, healthy, and sustainable community that preserves rural character, natural resources, open space, and local culture while providing economic opportunity, housing, public services, recreation, clean air and water, and responsible growth. Development such as data centers would be limited to industrial-designated lands, which are

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					largely separated from rural residential areas. The County does not have any active applications for new data centers. The local power providers are responsible for determining how to offset impacts to power rates.
76				We need better transparency in siting decisions for both power plants and data centers. Find a balance between companies' need for secrecy in property acquisition, and the community's need for information and input. Is transparency addressed in the draft plan?	Local project review has notice requirements for these and other projects along with SEPA review.
77				Advocate for a requirement for clean energy to power needs of data centers	Energy services are provided by local utilities that are not part of the Benton County government. However, the County is considering how to address future potential data centers and BESS, and where and how these facilities might be addressed in County code, and also with other service providers that would also be required to provide approval for power, water, etc.
78				We need a County Waste management facility. Benton County's new Hazard Household Waste Facility could be the start of a sorely needed regional waste management strategy.	Comment noted and will be shared with Solid Waste Advisory Committee
79	**Climate Comments**				
80	Steve Gahn – 5/27/26 public open house comment			Climate Element: The Comp Plan can also build resilience to climate change. It embraces the Yakima Basin Integrated Water Resource Management Plan, which is using state and federal funding to increase the water storage capacity of the watershed and encourage water conservation. It also describes how buildings and vegetation can be made resilient to wildfires. What it misses is the need to ensure that all residents who are sensitive to smoke have access to effective air filtration systems. Masks can help outdoor workers, but asthmatics need effective indoor air filtration systems. Funding is needed for that.	Comment noted and will also be shared with those agencies that have this responsibility
81	Citizen 5/27/26 Public open house			I want to see all residents have access to air filtration systems in their homes.	Comment noted
82	Citizen 5/27/26 Public open house			Is there some way to make a requirement for having an emergency cooling center by city or county as a long-term plan?	Yes, that is a good idea to have gathering places. Comment noted and will also be shared with those agencies that have this responsibility

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83	Lora Rathbone Richland, WA July 2026			Thank you for considering these concerns and suggestions for the climate element of the 2026 Benton County comprehensive plan. To be sure that the plan does more than just suggest changes based on good science, I strongly support the use of stronger language by using the words "must, will, shall, should and may".	Thanks for the background and feedback – comment noted
84				Wildfire and smoke management – The regional plan includes some good ideas – need to incorporate onto the Benton County plan, for health and to reduce damage to valuable grape crop.	The regional plan is incorporated by reference
85	WA State Dept. of Commerce Chaz Bates August 12, 2026			The goals and policies in the Climate and Environment chapter adequately address the Resiliency Sub-element requirements outlined in RCW 36.70A.070(9)(e)(i)(A)-(C) and are clearly supported by the research presented in the Climate Element (Chapter 11).	Thank you for this feedback
86				The goals and policies in the Climate and Environment chapter adequately address the Greenhouse Gas Emissions Reduction Sub-element requirements outlined in RCW 36.70A.070(9)(d)(i)(A)-(C) and are clearly supported by the research presented in the Climate Element (Chapter 11).	Thank you for this feedback
87				We commend Benton County for the cross-regional governmental approach to the climate element and research and for working toward regional alignment to address climate vulnerabilities and shared GHG emissions sources.	Thank you for this feedback
88				It is evident that many of the resources and tasks recommended in Commerce's climate guidance materials were used in development of the Climate and Environment chapter and that the resulting goals and policies are tailored to fit local needs.	Thank you for this feedback
89				The collection of maps and graphics in Climate Element (chapter 11) are well done and especially valuable for understanding how exposure to climate impacts vary across the county.	Thank you for this feedback
90				We commend the city for developing a 10-year Climate Element and GHG Sub-element Implementation Action Plan as part of chapter 11 that can guide implementation of the climate goals and policies presented in chapter 2.	Thank you for this feedback
91	Terri Stewart Richland, WA July 2, 2026	**Data Centers**		Note: This file contains comments that suggest safeguards to protect Benton County residents and our natural resources while continuing to achieve a balance between different industries and land use as large data centers make their first entries into the County. My comments are based on lessons learned from across the country, sometimes the hard way. My input is purposely formatted to be dropped into the Comprehensive Plan and stated from the County's point of view. I am suggesting adding a section on Large Data Centers (as an Element) similar to the Climate Element in the current plan. There are two reasons for this suggestion. First, this is a multi-year plan and large AI data centers are on the horizon now and for the foreseeable future. Second, large data centers are different than other industries described within the Comprehensive Plan. Specifically, the amount of power consumed is orders of magnitude greater than other conventional heavy industries or agricultural related industries. Additionally, the fact that the products from large data centers extend well beyond the region and may not even supply services to Benton County residents while we must manage the impact of their operation is a different situation that needs focused and careful thought. Finally, there are steps being taken in Richland to protect the residential rate payer by: • requiring the large data center get their own power which is a separate 'pot' from the residential rate payer, and • requiring the large data center to pay for transmission lines and interconnects. These policies are captured in my comments. But I want to point out that that doesn't get us out of the woods. Because residential rate payers share the same transmission system, we may still end up seeing rate increases. For more information on that possibility, I am providing a link to a publication from the Environmental and Energy Law Program at Harvard Law School. It describes how residential ratepayers may still see rates increase. It could inform additional steps to be taken by the County to protect residents. https://eelp.law.harvard.edu/wpcontent/uploads/2025/03/Harvard-ELI-Extracting-Profits-from-the-Public.pdf	We appreciate the information that you have provided. While we are not ready to include the suggested section into the draft Comprehensive Plan, please know the County is considering how to address future potential data centers and battery storage facilities, and where and how these facilities might be addressed in County code, and also with other service providers that would also be required to provide approval for power, water, etc. This comment will also be shared with power utilities in the County.

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				Please feel free to contact me with any questions. Note that references can be provided for the comments if needed. Large Data Centers (Element) Large data centers (also known as hyperscale or exascale data centers or AI Data Centers) are in various stages of proposal in Benton County. These include Atlas Agro's proposed Data Center in Richland at the Northwest Advanced Clean Energy Park. Atlas Agro also has a proposed green fertilizer plant, Pacific Green Fertilizer (PGF) which is inextricably linked to the data center and needs immense power (330 MW). The two facilities will share costs for infrastructure. Port of Benton is leading the land purchase for PGF and City of Richland will handle land purchase for the large data center. The total power requirement is 1,300 MW. Additionally, Trammell Crow LLC (TCC) is doing due diligence for a data center on the Lewis and Clark Ranch in West Richland. TCC is exploring a large data center campus requiring 250 MW to 912 MW. Based on lessons learned from other communities across the country, once high voltage transmission lines service an area, additional data centers or other large power using industry follows. Hence, it is also possible that future large data centers will be proposed on county land as well as other Ports or Cities. Therefore, Benton County working with Ports and Cities is addressing large scale data centers in the Comprehensive Plan. Historically, data centers have had smaller footprints with lower power and water consumption; they were often zoned as warehouses, i.e., light industrial. But in the age of AI, the new large data centers consume as much water and energy as a city and have a large land footprint. For example, Seattle has a power load of 2,000 MW; the proposed data centers in Benton County today slightly exceed Seattle's power load. Total power for Richland and West Richland proposed data centers is 2,212 MW. New zoning and other considerations such as displacement of current and future industries, impact to agricultural lands, and displacement of new homes competing for the same power and water must be balanced. Moreover, impact on natural environments and environmental health need to be incorporated into Comprehensive Plans at the county, port and city level to ensure coordinated growth that does not deplete or degrade our natural resources. For these reasons an Element for Large Data Centers has been included in the Comprehensive Plan Definition of Large Data Center For purposes of county planning and permitting, a "Large Data Center" shall mean any facility primarily used for housing computer servers, networking equipment, or digital processing equipment with a peak electrical demand greater than 10 megawatts (MW), including expansions of existing facilities that increase total site demand above this threshold. Typically, large data centers range from 50 MW to 1,000 MW or more housed on 500 or more acres with multiple buildings on its campus. Substations and high voltage power lines will be nearby. In West Richland, the data center will start with about 500 acres with potential to expand to 1,000 acres. In Richland, the combined footprint of the data center and PGF is 425 acres. The basis for identifying the power capacity at 10 MW in our definition of large data centers is consistent with the Bonneville Power Administration's (BPA) limit of 10 MW for all new users. All new users are now required to seek their own power provider or onsite power generation for any power needed in excess of 10 MW. If onsite power is generated, it must meet the Washington State renewable energy goals. If offsite power is sought, whether within the State of Washington or from other States or Canada, the power source need also comply with Washington State's renewable energy goals. For offsite power providers, new transmission lines and other infrastructure will be required. Power Sources and Transmission Benton County plans for appropriate location of data centers through zoning, permitting, and other planning actions will be based on the following expectations for large data centers.	

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				• Full Cost Recovery - Benton County will require large data centers to bear the full cost of all infrastructure, generation, transmission, distribution, interconnection, and systems upgrades required to serve their load. Existing utility customers shall not subsidize infrastructure developed to serve new large data centers' demands. • Marginal Cost Service - Large data centers shall also demonstrate that electrical service will be supported through new power resources, contracts, transmission capacity, or market purchases necessary to serve the facility. Existing legacy resources shall be prioritized for existing residential, commercial, agricultural, and industrial customers. • Demand flexibility - Large data centers shall be designed and operated to support grid reliability through mandatory participation in demand response, emergency curtailment, interruptible service programs, flexible scheduling, peak-load reduction programs, and other load-management measures established by the serving utility. The County prioritizes approval of facilities capable of reducing electricity demand during periods of grid stress, transmission congestion, resource scarcity, or emergency system conditions without adversely impacting air and water quality of the region. • Infrastructure before service - No large data centers may commence operations unless all generation resources, transmission facilities, distribution facilities, and contractual power arrangements necessary to serve the facility are operational and available. The County discourages speculative interconnection requests and utility overbuilding undertaken in anticipation of future data center demand. • Utility Capacity Verification - Prior to permit approval, applicants must provide a "will serve" letter or equivalent certification from the serving utility demonstrating that sufficient electrical capacity, transmission capability, and distribution structure area available or will be available to serve proposed facility. The County won't approve speculative projects lacking demonstrated utility capacity or a credible plan for service. • Clean Energy Requirements - Large data centers must demonstrate procurement of locally deliverable, additional, zero-emission electricity sufficient to meet facility demand on a 24-hour-per-day, 365-day-per-year basis. Additional clean energy resources must be developed such that data center demand does not reduce availability of existing clean energy resources needed for residential electrification, transportation electrification, or state climate goals. • Consistency with Energy and Climate Goals - Large data centers won't be approved unless the Applicant demonstrates that projected electricity demand is consistent with county climate goals, utility integrated resource plans, state clean energy requirements, greenhouse gas reduction targets, and long-term electrification needs for households, transportation, agriculture, public services, and industry. • Prohibition on Fossil Fuel Generation - Large data centers shall not utilize on-site combustion-based electricity generation except for emergency backup purposes authorized by permit. The County seeks to phase out diesel backup generation or aero-fuel turbines and prioritize non-combustion alternatives for backup power and resiliency services. Protection and Responsible Use of Water Resources	

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				Large data centers use huge amounts of water for cooling. Older designs used open loop cooling systems which use the largest amount of water, but the least amount of energy. Closed loop cooling uses less water at a higher power cost. Data centers primarily use Water Usage Effectiveness (WUE) to measure and describe the efficiency of their water consumption rather than disclose the amount of water used daily. WUE is defined as the ratio of site water used to the total equipment energy (WUE = {Liters of Water}/{kWh}). Lower WUE values indicate higher efficiency, which is the County's goal. For modern high-density data centers, permitting agencies should request a baseline WUE target of 0.2 L/kWh to 0.4 L/kWh. The industry average is 1.8 L/kWh, but best-in-class facilities utilize closed-loop, waterless, or near-waterless systems to achieve < 0.2 L/kWh. For our semi-arid climate that frequently experiences drought conditions, water usage by large data centers must be a critical consideration for siting a data center. Proper planning is required to avoid groundwater depletion and degradation, to avoid negative impacts to surface water in wildlife preserves and recreational areas, and to protect the Columbia River from overuse, thermal plumes or anti-corrosion, biocides, or PFAs from untreated wastewater. • Water Resource Protection - Large data centers shall be designed to curtail water use during periods when withdrawals or consumption may impair ecological flow, salmon recovery, aquifer sustainability, or treaty-protected Tribal water rights. The County prioritizes data center technologies and cooling systems that minimize freshwater consumption and maximize water usage efficiency. • Continuous Environmental Monitoring - Large data centers shall provide continuous monitoring and public reporting of: o Water withdrawals and consumption o Discharge temperature o Total dissolved solids o pH o PFAs and other persistent contaminants o Biocides and cooling-water treatment chemicals o Legionella monitoring results o Greenhouse gas emissions o Criteria air pollutants o Backup generator operation and fuel consumption. Monitoring data shall be publicly available in near real time through an accessible public reporting platform. Reducing Financial Risk to Benton County Residents There are situations where proposed and future large data centers are high risk. For example, both Richland and West Richland data centers are being developed by companies who will not ultimately operate or be a user of the facility. At this time, a potential user or operator has not been identified. An unoccupied facility would be a risk. Another type of risk is associated with the PGF which is linked to the Richland data center. The green fertilizer plant is the first of its kind. The developer proposes to build full-scale without completing a pilot-scale testing. There is the potential for failure or delayed production due to startup problems that might result in ending the project. Another risk is that AI data centers are rapidly evolving, and today's designs may not be viable within the next 10 years.	

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				When there is higher than usual risk, financial security and stranded asset protection is a reasonable approach to reduce liabilities to the County and its residents. • Financial Security and Stranded Asset Protection - Prior to receiving final approval, large data center operators shall provide financial assurance sufficient to protect utilities, local governments, and ratepayers from stranded costs associated with project cancellation, downsizing, abandonment, or early closure. Financial assurance mechanisms may include letters of credit, security deposit, parent guarantees, collateral requirements, decommissioning bonds, or other forms of financial security. • Prior to construction, large data center owners and subsequent users or operators shall submit and maintain a decommissioning and site restoration plan. The plan shall identify funding mechanisms sufficient to cover facility closure, equipment removal, environmental remediation, and site restoration in the event of project abandonment, bankruptcy, or cessation of operations. Solid waste handling Large data centers drive a massive surge in electronic waste (e-waste). Graphics Processing Units (GPUs) and servers become commercially obsolete every two to five years. Discarded hardware contains toxic components and critical materials—such as rare earths, gallium, and indium. Improper disposal leaches these heavy metals, including lead and mercury, into soil and groundwater. Although there are valuable rare earths in the waste that might suggest recycling, the recycling rates are low due to material lock-in. Recovering these vital materials is a difficult technical and economic hurdle. Traditional e-waste recycling rates for these specific rare earth or trace metals are estimated to be close to zero due to the complex, time-consuming separation required. The environmental impact of this hardware is asymmetrical. Those populations closest to the disposal operation pay the environmental prices. Benton County Control Mechanisms To protect the County and county residents, there are two actions that can help inform and enforce. • Transparency and Public Reporting – Large data centers shall submit annual public reports detailing: o Electrical consumption o Peak demand o Water consumption o Greenhouse gas emissions o Local employment o Tax incentives received o Infrastructure investments required to serve the facility o Compliance with demand-response and curtailment obligations Annual report shall summarize performance, environmental impacts, compliance status, and progress toward energy and climate commitments. • Enforcement – Failure to comply with permit conditions, reporting requirements,	

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				environmental standards, operational commitments, clean energy obligations, curtailment requirements, or monitoring requirements shall constitute grounds for permit modification, suspension, revocation, civil penalties, denial of future expansion requests, or other enforcement actions authorized by law. Mitigating Distance Benefits, Local Burden One of the unfortunate outcomes of large data centers is captured by the concept of 'distance benefits and local burden.' Typically, the products of large data centers are aimed at commerce beyond the local region (distance benefits) while the local community bears the burden associated with huge power consumption, water depletion and degradation, environmental health impacts, noise and light pollution during both construction and operational phases, increasing residential power rates, and costs due to abandoned assets. The County aims to mitigate power stress, water depletion and degradation, abandoned assets, and solid waste issues to protect County residents and ensure a balanced distribution of County	
References Comments					
92		12,DOE 1999 Reference	215	Please change the reference from DOE/EIS-0222D to DOE/EIS-0222F. Basis - The reference refers to the draft EIS, DOE/EIS-0222D. It should reference the final EIS, DOE/EIS-0222F.	Update as suggested
Comments on Technical Appendices					
93	**Brooke Frickleton** Deputy Legal Director Futurewise – 1/6/2025			I'm reaching out from Futurewise to learn more about Benton County's 2026 Comprehensive Plan update process and to understand how the public can meaningfully participate. I've reviewed the County's Public Participation Plan (February 2025), Work Plan, project webpage, and recent Planning Commission and BOCC agendas. While the PPP outlines robust public engagement commitments, I've had difficulty locating evidence that these commitments are being implemented. I wanted to check in about a few things; in case there's information I may have missed. **Missing Public Engagement Infrastructure** The PPP states the County website will include "an email address for submitting public comments" and "an interested party sign up link" (PPP, page 6). I was unable to locate either resource on the project webpage. Additionally: • Status updates, meeting notices, and draft documents are not readily accessible • Planning Commission agendas contain limited information, and meeting minutes are often unavailable or difficult to locate • Recent BOCC agendas show no mention of the comprehensive plan or critical areas ordinance updates • The project webpage lists draft elements and shows a "January 7th 2026 Planning Commission Meeting," but the actual agenda shows January 6th with unclear alignment to those drafts **Public Engagement Resources:** • The Public Participation Plan states that the County website will include "an email address for submitting public comments" and "an interested party sign up link" (PPP, page 6), but I was unable to locate either resource on the 2026 Comprehensive Plan Update webpage. • I could not easily find recent status updates, meeting notices, agendas, or draft documents posted on the project website.	Thank you for reaching out. If you go into the County website, you will find the 2026 Comprehensive Plan Update page has been updated! The website now includes information about our busy YR 2025 and a look forward to the timelines in 2026. This documentation should hopefully answer many of your questions in your email. We did ensure our contact email and interested party sign up list information is accessible and easy for people to locate from our Comp Plan website page. Regarding SEPA scoping, the scoping comment period ran from March 26, 2025 through April 25, 2025. Additionally, a scoping public meeting was held on April 8, 2025, at 6:00 PM in Prosser, WA. The meeting was documented in the scoping and public participation reports. The public participation report (also referred to as Engagement Report) includes additional information on public involvement activities completed as part of the update process. See website link above to access this information. Benton County also met with FutureWise in follow up to this set of comments and

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				○ Planning Commission agendas appear to contain limited information, and meeting minutes are often unavailable or difficult to locate on the County website. ○ I reviewed several BOCC agendas from the last year but found no mention of the comprehensive plan or critical areas ordinance. **Process Timeline Questions** 1. Quarterly Planning Commission presentations: The PPP indicates that "upon completion of preliminary drafts of updated Comprehensive Plan elements, the Benton County Planning Commission will receive presentations...typically at least quarterly" with "opportunity for public questions and input" (PPP, page 4). I found no evidence of these presentations in 2025 Planning Commission agendas. Have these occurred? 2. Critical Areas Ordinance: According to the Work Plan, the CAO update should have been completed by November 2025. What is the current status? 3. Countywide Planning Policies: The January 6, 2026, Planning Commission agenda includes discussion of these policies. How can the public provide input? Was there public notice of this process? 4. Public workshops: Workshop materials and presentations posted on the comprehensive plan website (including housing element and other draft elements) indicate workshops occurred on dates that don't align with Planning Commission meetings. I searched the newspaper legal notices and the County's News & Information webpage but found no public notices for these workshops. How was the public notified of these meetings and given the opportunity to attend? **SEPA Process Concerns** The "Request for Comments on Scope of Programmatic EIS" (dated March 26, 2025) stated the County would hold a public scoping meeting on April 8, 2025, and anticipated "additional public meetings following the development of the EIS alternatives in the fall of 2025/early 2026." However: • I was unable to locate public notices for the April 8th scoping meeting or any subsequent meetings • The May 13, 2025 workshop summary indicates only three comments were received during the scoping period—two by email and one oral testimony. This a very low level of participation in a countywide comprehensive plan update suggests the public was not adequately notified of the scoping process and indicates that the County may have failed to "broadly disseminate" information about this critical public comment opportunity as required by RCW 36.70A.140. • It's unclear how the draft EIS alternatives informed the development of draft plan elements, as typically the EIS process precedes element drafting Has a full draft EIS been released for public review? RCW 36.70A.140 requires jurisdictions to "establish and broadly disseminate to the public a public participation program identifying procedures providing for early and continuous public participation." The PPP's plan to host only "one or two public open houses in 2025" does not appear to meet the "early and continuous" standard I'd appreciate your help in accessing the following so Futurewise can participate effectively in the remainder of this process: 1. The comment submission email and interested parties sign-up mentioned in the PPP 2. Schedule of upcoming workshops and public hearings beyond the scheduled planning commission meetings (like the element presentations)	subsequently shared additional information to address the identified questions and comments in meetings and emails.

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				3. Current status of the CAO update, draft EIS timeline, and overall work plan status if available. Futurewise has worked with many jurisdictions on their 2026 updates and we're happy to share what we're learning or provide informal consultation if that would be useful. We want to support Benton County in developing a strong, compliant plan that serves your community well.	
94	Dept. of Energy 6/17/26	Appendix A - Map Folio		HFO cannot guarantee the factual accuracy of the Hanford information throughout the document including figures depicting the Hanford Site. One example of a change would be to correct all DOE Hanford Site maps that label the area south of State Highway 240 as the Saddle Mountain National Wildlife Refuge to read Fitzner-Eberhardt Arid Land Ecology Reserve. Basis - Saddle Mountain is located on the north side of the Columbia River, outside of Benton County. There is no Saddle Mountain National Wildlife Refuge.	Understood. We will consider these updates. Map Folio updated to include Fitzner-Eberhardt Aird Land Ecology Reserve
95		Appendix A – Map Folio		HFO cannot guarantee the factual accuracy of the Hanford information throughout the document including figures depicting the Hanford Site. One example of a change would be to review all DOE Hanford Site maps that include a boundary for the "Federal Refuge." This term is not introduced in Volume I. Basis - The "Hanford Refuge" boundary reflects an older boundary of the Hanford Site before more recent land transfers (1100 Area, TRIDEC).	Understood. Maps are for general planning and not used to verify accuracy. No additional updates made.
96		Appendix I - Industrial Lands Inventory Memorandum, Page 4		Update discussion of the Hanford Site. Lands comprising the Hanford Site are owned by DOE and not the public.	Will clarify in the document
97		Appendix I - Industrial Lands Inventory Memorandum, Page 6			
98	WDFW Scott Downes 6/11/2026	Appendix N		Draft Comprehensive Plan. Volume II. Technical Appendices. Appendix N. WDFW submitted comments to Benton County on suggested revisions to the shrubsteppe mitigation program on May 11, 2026. Please incorporate those recommendations.	Update as suggested.
Open Space Memo					
99	WDFW Scott Downes 11/14/2025	**Open Space Memo**		<u>Open Space:</u> We appreciate the thoughtful and thorough analysis conducted in the open space memo and that tools such as WAHCAP, PHS, WSRRI and Arid Lands Initiative (ALI) were part of the analysis. To improve these open space recommendations for wildlife habitat, we offer the following suggestions. Protection measures. In open space areas where wildlife habitat is an identified key principle (such as identified in WAHCAP, PHS, WSRRI or ALI), we recommend limiting the amount and type of recreation to limited infrastructure and when planning recreational trails, consider a balance between trails and overburdening human use in these sensitive wildlife habitats. We recommend a more restrictive open space category such as natural open space be implemented in these areas to reduce conflict. We appreciate the inclusion of many areas into the open space list. We would like to offer a few additions for consideration that are identified as high value wildlife habitats in tools such as WAHCAP, PHS, WSRRI and ALI:	Thank you for the suggestions. In open space areas with important habitats where only limited recreation and infrastructure is appropriate, the County will address this through property scale planning, which is primarily implemented through parks planning. Parks planning typically considers the appropriate intensities and types of recreation, infrastructure, and trail alignment for each property or area.

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				C1. Horse Heaven Hills. While it would include private lands, consider extending the currently proposed open space corridor west to the county line. This entire corridor is identified as a Connected Landscape of Regional Significance in WAHCAP and is also identified in analysis such as ALI. Figure 4 identifies arrows noted in WAHCAP running from the Yakima River to the Rattlesnake Slope west of Benton City. This area is of importance to wildlife connectivity. Please include it in the list. Figure 4 identifies the wildlife connectivity corridor that runs in the southern part of the county from the Klickitat County line to Wallula Gap. This corridor is noted in multiple connectivity analysis such as WAHCAP, PHS BAC and ALI. Please include it on the list. The area north of Highway 24 from the Yakima County line through the US Department of Energy Hanford Site has been identified in WAHCAP as a Connected Landscape of Statewide Significance. Please include it in the list.	For C1, update Figure 4 as needed to extend corridor line west to the County line (although dark blue shading demonstrates that corridor extends to County line). In the Open Space Memo, some areas that are shown as WAHCAP or other Open Space corridors in the map figures are not included in the inventory list of corridors. This is because the inventory focused on "open space corridors within and between Urban Growth Areas", per RCW 36.70A.160. The other open space corridors identified in the map figures will still be considered in broader planning efforts and in specific programmatic efforts such as shrubsteppe mitigation and the open space taxation program,
100	KID July 2, 2026	**C6 Amon Creek Corridor**		The Amon Creek (add"Badger Drain") riparian corridor forms an urban greenway….	Update as suggested
101	KID July 2, 2926	**C7 Elliott Lake Corridor**		Elliott Lake is a spring-fed "irrigation reservoir" not lake	Update as suggested
Energy Overlay Memo					
102	WDFW Scott Downes 11/14/2025			Energy Overlay Memo: WDFW released our Wind and Solar Guidelines in September 2025. https://wdfw.wa.gov/sites/default/files/publications/02662/wdfw02662.pdf. As part of that guidance, we recommend complete avoidance of PHS BACs, Washington Shrubsteppe Restoration and Resiliency Initiative (WSRRI) Cores and Growth Opportunity Area and areas with a WAHCAP score of 8+. They are lands that are currently listed as conditional use in the Energy Overlay Memo, Figure 1. We recommend that these areas should be part of the Zone 1 Prohibited for the Energy Overlay Zone. We also recommend consulting with local tribes to ensure that you are avoiding culturally sensitive areas in the Energy Overlay.	The memo was updated to include reference to WDFW's Wind and Solar guidance. Ultimately the County decided not to propose an energy overlay zone, but to rely on the existing County provisions that allow energy projects in designated industrial lands and unclassified lands as a conditional use. The County also intends to use the information from the memo to support input to state permitting efforts for future energy projects through EFSEC.
103	Bill Barlow 5/27/2026 Public comment			Require an EIS for siting of new energy facilities Factor in health, safety, and quality of life of local communities along with farmlands and sensitive habitats	An EIS is required when significant impacts are expected. This decision of whether to prepare an EIS is made at the time of application. The items noted are factored into both an EIS and SEPA checklist, as applicable.
104	Gail Taff June 19, 2026			Comments on Volume 2 Appendix J: Energy Overlay Memorandum: I support grid improvement in general, such as adding more storage batteries and more clean energy (solar, wind, nuclear, and consider geothermal), to meet the expected growth in demand and state CETA requirements. I also support improved grid efficiency. Possibilities include microgrids and waste mining for re-use or up-cycling. There is even software under development that, if it works, could assist with load balancing.	Comments noted

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				I volunteer with Sustainable Tri-Cities, and several of us have had a number of conversations recently with members of the public about data centers. They are concerned about (1) possible over-use of our limited water supply for cooling of data centers, and (2) noise, especially when data centers are located too close to residences. Except for data center workers, the noise produced by a data center usually does not meet the definition of noise pollution which damages hearing, but it's often very annoying 24/7/365, affecting people's quality of life (https://www.eesi.org/articles/view/communities-are-raising-noise-pollution-concernsabout-data-centers). It also includes low-frequency noise, which some researchers suspect may be harmful to human health (https://www.sciencedirect.com/science/article/abs/pii/S0048969716304338). Larger setbacks for data centers from residential areas may be needed, as it's not clear what distance would be required to eliminate the impact of noise on residences. People have told us they'd like to see more transparency in the siting of data centers. Consider balancing the needs of the companies acquiring sites (such as confidentiality in negotiations) with county residents' concerns.	
105				Comment on wildfire prevention in the urban/rural interface: In Table 11-2 on page 205, I agree that many living in the Wildlands-Urban Interface are not aware of the risk or how to mitigate it, and I hope to see more Firewise communities in Benton County.	Comments noted; we are also working towards increased resiliency to fire risk.
106				Comment on Appendix N: I support the proposed shrubsteppe mitigation program described in Appendix N. The natural environment and its wildlife are a key aspect of our county's character.	Comment noted and thank you for the support
Title 9					
107	KID July 2, 2026	9.07.040	9-54	Section a – add and irrigation districts after utilities companies	Update as suggested
108		9.09.020	9-68	At the end add - There are existing combination easements within the Cities of Kennewick and Richland. It helps to reduce the overall encumbered land while meeting the statutory requirements of RCW 58.17.310 on subdivisions.	Comment noted
109		9.10.060	9-81	Section h add at end - The boundary line adjustment must not result in the property losing access to any irrigation easements.	Comment noted
Title 11					
110	WA State Dept. of Commerce Chaz Bates August 12, 2026	11.03.010		Benton County Code 11.03.010(67). We support the definition of single-family dwelling that includes designated manufactured homes, modular homes, and site-built homes. The definition supports RCW 36.01.225 in treating manufactured homes the same as traditional site-built homes.	Comment noted
111		11.03.010		BCC 11.03.010. Consider adding definitions for "mass timber construction" and "modular construction" to the definitions to assist in implementing RCW 36.70A.815 and .817 which prohibits the county from requiring façade modulation, upper-level setbacks or off-street parking as a condition of permitting these types of residential projects. We did not see any standards for façade modulations, upper-level setbacks or off-street parking in the proposed amendments. If these standards exist elsewhere in your development code, we recommend evaluating those standards to be consistent with RCW 36.70A.815 and .817.	Benton County does not require facade modulation. Benton County has no parking standards for any type of development.
112		11.07.030		BCC 11.07.030(g). Consider revising to be clear that co-living housing is permitted use on any lot located within an urban growth area that allows at least six multifamily residential units. The provision as written could be interpreted as co-living is only allowed on lots that support six multi-family residential units.	Updated as noted in the Urban Growth Area Residential District.
113		11.31.030		BCC 11.31.030. The Interchange Commercial District allows hotels and motels as an allowed use. Chapter 232, laws of 2026, (HB 2266) requires fully planning counties to allow transitional housing, permanent supportive housing, and indoor emergency housing (STEP housing) in any zones within UGAs where hotels are allowed. An overview of the requirements can be found on our website at: HB 2266 STEP Overview June 2026. This bill is preemptive, and Benton County must adopt provisions consistent with the bill by its periodic update.	The Interchange Commercial designation does not exist wihtin the boundaries of any Urban Growth Area. No changes proposed.
114				Off road parking – various sections. In many places it appears that "adequate off-road parking, as determined by the Hearing Examiner, must be provided. We recommend that additional guidance or standards be incorporated that recognize limits on off street parking, specifically RCW 36.70A.622 and RCW 36.01.397.	Comment noted

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115		11.09, 11.23, 11.33 and 11.35		(In response to Comment 30, regarding limiting additional designated R-1, Commercial or Industrial lands outside UGAs, accompanying zoning code changes are proposed.)	Add this sentence into Title 11.09.020 Applicability, Rural Lands One Acre…"The County shall not allow the expansion or establishment of any additional Rural Lands One Acre District zoned lands effective with the adoption of the 2026 revisions to this chapter." Add this sentence into Title 11.23.020 Applicability, General Commercial…"For those lands located outside a designated Urban Growth Area, the County shall not allow the expansion or establishment of any additional General Commercial District zoned lands effective with the adoption of the 2026 revisions to this chapter." Add this sentence into Title 11.33.020 Applicability, Light Industrial… Effective with the adoption of the 2026 revisions to this chapter, the County shall not allow the expansion or establishment of any additional Light Industrial District zoned lands outside a designated Urban Growth Area. Add this sentence into Title 11.35.020 Applicability, Heavy Industrial…"Effective with the adoption of the 2026 revisions to this chapter, the County shall not allow the expansion or establishment of any additional Heavy Industrial District zoned lands outside a designated Urban Growth Area." [*Note: During final editing of code sections by the County, minor wording adjustments may be made by code publishing service but intent of the proposed changes will still be met*]
116		11.31.030		Related to affordable housing	Provide the following additional allowable uses:

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					11.31.030 ALLOWABLE USES. (k) Transitional housing (l) Permanent supportive housing (m) Indoor emergency housing (shelters, transitional housing, emergency housing, and permanent supportive housing)
117				The proposed regulations appear to mix ADU regulations outside UGAs and ADUs inside a UGA. While similar the standards and obligations for addressing ADUs inside UGAs versus outside UGAs are different, and we recommend separating these provisions into separate subsections, one for rural ADUs and one for urban ADUs. For ADUs inside the UGA: HB 1337, passed in 2023 and codified at RCW 36.70A.680, .681 and .696, requires jurisdictions to allow two ADUs per lot within urban growth areas (UGAs) with their periodic update cycle or be preempted. A checklist is available to help local governments meet the statutory requirements. ADU checklist for UGAs. For ADUs outside the UGA: HB 1345, passed in 2026 and codified at RCW 36.70A.685, went into effect On June 11, 2026. This law applies to all detached ADUs outside of UGAs. Any changes to rural ADU standards are required to comply with HB 1345. A checklist is available to help local governments meet the statutory intent of House Bill 1345 (2026) for regulations related to rural accessory dwelling units (ADUs) outside urban growth areas (UGAs). DADU checklist outside UGAs.	The ADU regulation (11.42) is being updated to allow two lots per ADU within UGAs. The rural ADUs are retained as is.
118	KID July 2, 2026	11.19.100	11-113	Comment regarding line 1 - KID has concerns that newly created lots will be stranded without access to irrigation infrastructure and easements. This could result in additional RWSP mitigation requirements.	Comment noted
Comments on Critical Areas Ordinance (Title 15)					
119	Debbie Berkowitz July 1, 2026	Section IIA. Comments on CAO 15.02 General Provisions		This chapter does a good job of covering many of the actions that are important for the County to consider in administering its CAO. I do, however, have a number of specific comments/suggestions that would help clarify and strengthen some of the sections. 15.02.010 Purpose - there are a lot more functions that these critical areas supply - it would be useful to enumerate them either here or in each individual CAO section in order to strengthen the idea that they supply important benefits to Benton County and its residents. For example, see my comment #2 for 15.14, line 133 in this document.	Thank you for the thorough review and comments. The purpose section will be strengthened to include additional functions beyond those currently listed.
120		15.02.020 (b)		15.02.020 (b) ' The County may withhold, condition, or deny development permits or activity approvals...' The may in this statement makes it appear that following the CAO is optional. Please change 'may 1 to "should" (using the definitions suggested 15.020.070, my comment #20, Line 96 in this document).	Comment noted – the "may" is designed to demonstrate these various responses are all options in meeting Chapter 15 requirements.
121		15.02.030(c)		Please add-"The provisions of this chapter apply whether or not a permit or other type of county approval is being sought." (I.e., even if an activity doesn't trigger a SEPA review, following the CAO is required.)	Section 15.02.120 has an even stronger existing applicability statement that appears to adequately cover the intent of this comment.
122		15.02.070 (11)		Compensatory mitigation is described only for wetlands. Please add FWHCAs, i.e., 'wetlands or FWHCAs' to each mention of 'wetlands.'	Update as suggested
123		15.02.070 (16)		Cumulative impacts are not just impacts within a particular place or time. They occur over a much larger scale, and they occur over a longer period of time. E.g., cumulative impacts to shrub steppe are on a landscape scale and must be considered across multiple projects and timeframes. For riparian habitats, cumulative impacts would be on a watershed scale.	Update definition to read: **Cumulative Impacts (Cumulative Effects):** The combined, incremental effects of past, present, and

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					reasonably foreseeable future actions on a critical area, its buffer, associated habitat, watershed, aquifer, or ecosystem. Cumulative impacts may result from individually minor activities that, when considered collectively over time, degrade critical area functions and values, reduce ecological resilience, diminish habitat connectivity, impair water quality or quantity, or contribute to a net loss of ecosystem functions. Evaluation of cumulative impacts for changes to policies and permitting decisions shall occur at the geographic scale necessary to assess affected ecological processes and functions.
124		15.02.070 (38)		In-kind compensation. This seems vague and would be better addressed under shrub steppe mitigation or wetland mitigation (and should apply to other activities as well).	Update definition to read: **In-Kind Compensation:** A compensatory mitigation action that replaces an impacted critical area or critical area function with the same or substantially similar type of habitat, ecological process, species support function, hydrologic function, or other ecosystem service. In-kind compensation emphasizes replacement of ecological functions and values rather than acreage alone and is preferred where it will most effectively achieve no net loss of critical area functions and values. Examples include replacing wetlands with wetlands of similar hydroperiod and function, replacing riparian habitat with comparable riparian habitat, or replacing habitat features used by the same wildlife species assemblages.
125		15.02.070 (43)		'...development proposals "or other activities"....' (i.e., add "or other activities"). Activities other than development proposals may have an impact on critical areas and may require mitigation and monitoring.	Update as suggested
126		15.02.070 (52)		Practical alternative should also include a comment about requiring no net loss of functions and values of critical area functions. E.g., "and has fewer impacts to critical areas, but still results in no net loss of critical functions and values."	Update definition to read: **Practical Alternative:** A feasible project alternative that can reasonably accomplish the basic purpose of the proposal and is available in light of economic, technological, logistical, legal, and environmental considerations. A practicable alternative is one that avoids impacts to critical areas and their buffers where possible and,

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					where avoidance is not possible, minimizes impacts to the greatest extent practicable. The applicant shall demonstrate that no other practicable alternative exists that would have less adverse impact on critical area functions and values while still meeting the fundamental objectives of the proposed action.
127		15.02.070 (55)		Project area should include any area 'adjacent' to an area proposed to be disturbed.	Update the beginning of the definition to read: **Project area**-All areas within or adjacent to… (see also definition 1 - adjacent)
128		15.02.070(56)(i)		A qualified professional for fish & wildlife habitats should have a degree in wildlife biology, zoology, ecology, or fisheries (or a degree in biology specializing in one of these fields) - and not just a generalized biology degree (in addition to the professional experience related to the subject species or habitat).	Comment noted and no additional change proposed - There are many qualified professionals with varied biology degrees; to try and name all the different types or be too specific could result in unnecessarily limiting an otherwise qualified person who also has relevant work experience related to the subject species or habitat from potentially doing the work.
129		15.02.070(58 vs 59)		Repair or maintenance. If an activity goes beyond the authorized scope of approved work, restoration should be required to restore function of a critical area.	Section 15.02.220.c already has this requirement that addresses this comment, as part of mitigation sequencing and this also applies to repair and maintenance activities. Also, update 15.02.130 to include this sentence at the end of the paragraph: "If an activity goes beyond the authorized scope of approved work, restoration should be required to restore function of a critical area."
130		15.02.070 (60)		Riparian Management Zone is defined as the area that has the potential to provide full riparian functions. The rest of this is better discussed in 15.14 RMZs, as has been done for wetlands - i.e., specifics of wetland buffers is not included in this definitions section (and shouldn't be). If, however, this is included here, it should state that "In non-forest zones the RMZ is defined by the greater of the outermost point of the riparian management zone (which includes upland vegetation, not just riparian vegetation) or the pollution removal function, a minimum of 100ft." (as per WDFW Riparian Ecosystems, Vol. 2 Management Recommendations, Dec. 2020, Chapter 2.3)	Update definition to read: **Riparian Management Zone (RMZ):** An area of land adjacent to a stream, river, lake, wetland, marine shoreline, or other waterbody that contains or is intended to support riparian ecological functions and processes. The Riparian Management Zone includes vegetation, soils, floodplain features, and habitat elements that influence water quality, water quantity, channel stability, nutrient cycling, large woody debris recruitment, microclimate regulation, flood attenuation, and fish and wildlife habitat. The RMZ is managed to protect, maintain, and

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					where necessary restore these ecological functions and values.
131		15.02.070(61)		Add "and" at the end of i through v. I.e., this list should be all of the above.	Update sentence before list of items i-v, to read: The characteristics of a valid scientific process must include all of the following:
132		15.02.070(63)		'Serviceable.' Where is this term used in Chapter 15? It doesn't appear to turn up in a search.	It is included in definition 58.
133		15.02.070(67)		paragraph two. ' ...other dominant shrubs "may" include "(but are not limited to)" ....' Please add "may" since these are not required and "(are not limited to)" since other shrubs like spiny hopsage, gray and green rabbitbrush, may be present (in part depending on the stage of recovery of shrubsteppe habitat)	Update as suggested, noting this is the PHS definition that WDFW asked the County to include.
134		15.02.070(67 paragraph three)		'...which may be influenced by soil condition and erosion' add "and other factors including temperature, elevation, etc."	Update as suggested, noting this is the PHS definition that WDFW asked the County to include.
135		15.02.070 (67)		Add "Fire disturbance is an ecological component of shrubsteppe. Shrubsteppe disturbed by fire may lack the aforementioned habitat components during periods of post-fire recovery." (Based on WDFW recommendation)	Update as suggested
136		15.02.070 (68)		Significant portion of its range. What is a non-significant portion of its range? How does this take into account cumulative impact?	Update definition to this: **Significant Portion of a Species' Range** means a geographic area that contributes meaningfully to the continued viability, recovery, resiliency, redundancy, representation, genetic diversity, ecological function, population persistence, or long-term survival of a species, considering both existing conditions and the cumulative effects of past, present, and reasonably foreseeable future actions. *Note: Insignificant Portion of a Species' Range means an area whose loss, degradation, or alteration would not be reasonably expected to measurably reduce the species' long-term viability, recovery potential, population persistence, ecological function, genetic diversity, distribution, resiliency, redundancy, or representation across its range, and including*

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					considering cumulative effects of reasonably foreseeable impacts.
137		15.02.070(72)		Species of local importance. This definition doesn't take into account the various criteria that are considered in the new Section 15.14.020 (Designation of habitats and species of local importance). A more inclusive definition would be 'species that are important locally to the people of Benton County.'	Update using this definition: **Species of Local Importance** means a habitat or species, population, or group of organisms that is not otherwise listed as endangered, threatened, sensitive, candidate, or priority by federal or state agencies, but has been determined by the local jurisdiction to warrant conservation because of its rarity or vulnerability, need for protection, contribution to local biodiversity, special value or habitat connectivity objectives.
138		15.02.070		Please add definitions for 'may ', 'should ', and shall, as follows: • "May- Gives permission (allowed) and implies that the stated policy/action is advisable." • "Should- Means implementation of the policy/action is expected, but its completion is not mandatory because it allow for special circumstances that could make a policy become inappropriate or infeasible." • "Shall- Means implementation is mandatory, i.e., set policies/actions must be followed."	Update as suggested
139		15.02.100		Even under reasonable use provisions, off-site mitigation should prevent no net loss. Therefore, please eliminate the part of the last sentence that states 'except under the reasonable use provisions of this chapter.'	Agree – update as suggested
140		15.02.110(c)		' ...whether the source of the information displays the characteristics of a valid scientific process.' Change the last sentence and add (from WAC-365-190-905: "When weighing scientific information contained in the record for inclusion, the Planning Administrator shall weigh the scientific information contained in the record based on its scientific validity. The characteristics generally to be expected in a valid scientific process are as follows:..."	Update as suggested
141		15.02.150 (b)		After '(SEPA documents).' please add, "If development of this area will result in a net loss of critical area function or values, then mitigation sequencing shall be followed with on-site in-kind mitigation preferred. If off-site in-kind mitigation is required, then the appropriate sections of 15.02 and 15.14 shall be followed. A mitigation plan based on best available science will be submitted to the Hearings Examiner as part of the approval process."	Update as suggested except the last suggested sentence will be modified to read: "A mitigation plan demonstrating no net loss of ecological function and consistent with best available science will be submitted to the Hearings Examiner as part of the approval process." BAS is also included as review criteria in (d)(4) of this section.
142		15.02.160 (a)		Would a critical area report have been required previously for these allowed activities if they had the potential for impacting a critical area? I.e., what is meant by a 'separate critical area report?' 'The Planning Administrator may apply conditions to ensure that the allowed activity is consistent with protecting critical areas.' Change 'may' to "should" [given the definitions suggested for this chapter].	Update to: "The Planning Administrator ~~may~~ <u>should</u> apply conditions, <u>as applicable</u>, to the underlying permit or approval to ensure that the allowed activity is consistent with the provisions of this chapter to protect critical areas. "
143		15.02.160 (c)		This is confusing. All the activities in (c) through (k) are allowed. It would be less confusing if (c) were followed by a list (l) 'permit requests' through (9) 'hunting/etc.'	Agreed - update as suggested to format all items that fall under (c) Allowed activities.

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					Formatting update only; no content changes required.
144		15.02.160(g)		Criteria are given for wetlands, but these criteria should also apply to RMZs. There should also be criteria for other FWHCAs, e.g., in FWHCAs, placement and number of trails should consider a balance between human use and needs of wildlife, depending on the location and sensitivity of the FWHCA.	This was a specific change requested by Ecology for wetlands; RMZs can have a larger variation of conditions and functions, and so would trail or walkway locations could also vary as long as they are consistent with mitigation sequencing and no net loss of ecological function. For example, an area with a narrow riparian vegetation corridor that extends only to 40 percent width of the RMZ next to a disturbed cheatgrass area could accommodate a walkway or path that protects water quality at 50 or 60 percent, instead of in the outer 25 percent only.
145		15.02.220		It would make more sense if the section on Mitigation sequencing (15.02.220) came before the section on Mitigation requirements (15.02.210) in the text.	Update as suggested; agree that would be a better flow (format change only)
146		15.02.210(d)		After 'expected ecological uplift,' add "and should demonstrate measurable improvement based on BAS,"....	Update to include "and should demonstrate measurable improvement." It is not necessary to continue to repeat "based on BAS," as it is included in item (a) of the same section.
147		15.02.210(e) (2)		... to replace' - add "and improve" the impacted functions (WDFW POL-M5002, 1999) based on the required mitigation ratio.	Update as suggested to read" Off-site mitigation located in Benton or an adjacent County with mitigation measures to replace and improve the impacted functions based on the required mitigation ratio."
148		15.02.210(e) (2)		Mitigation should occur in Benton County unless suitable off-site locations aren't available in the County. Mitigation measures should replace "or exceed" impacted functions (i.e., add "or exceed")	Update as suggested – keep option open for other counties if more suitable
149		15.02.210(e)(post (4))		It should be noted that (3) and (4) should rarely be used. Please add, "Out-of-kind mitigation should only be approved when it can be shown to provide significantly superior biological functions and values than in-kind mitigation."	Update as suggested
150		15.02.21O(f)		...' monitoring that continues until success criteria are met. Delayed or unsuccessful mitigation should require additional compensation or corrective actions.' Mitigation that fails after success criteria are met means that there has been a net loss of critical area function. Monitoring needs to be long term and corrective actions shall be taken. This is especially true for compensatory mitigation.	We believe this intent is addressed with "until success criteria are met."
151		15.02.210(g)		The county should require, not prefer, long-term monitoring and site protection (conservation easement, deed restriction ...) for mitigation areas both onsite and offsite, including those onsite areas that are still held by the landowner.	Update as suggested
152		15.02.230 (e)		Add "On-site monitoring shall be annual until success criteria are met and maintained for a period of not less than 10 yrs. On-site monitoring shall occur every 3 yrs after that to make sure that the mitigation results haven't been damaged. Off-site monitoring shall be done at least annually, in perpetuity."	The monitoring time period is determined as part of the mitigation plan as prepared by a qualified professional in combination with permanent protection through deed restriction

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					or conservation easement. The County wants to be able to provide flexibility and avoid being too prescriptive to develop tailored monitoring solutions for each project and mitigation property situation.
153		15.02.240(a)		Add "(7) A critical area report and mitigation shall evaluate cumulative impacts at the landscape scale for shrub steppe or the watershed scale for riparian areas to ensure that no net loss is achieved collectively across projects."	Update as suggested, with the following addition: "(7) A critical area report and mitigation shall evaluate cumulative impacts at the landscape scale for shrub steppe or the watershed scale for riparian areas to ensure that no net loss is achieved collectively across projects. This includes considering other habitats surrounding the subject property within ½ mile, and the relationship (or lack thereof) to the project area. Additionally, discuss the spatial habitat context for shrubsteppe for the subject and surrounding properties." Additionally, cumulative impacts were evaluated in the EIS. Cumulative impacts are also evaluated through the SMP and its critical area protections.
154		15.02.240 (b)		Change 'may' to "shall." This shouldn't be optional.	Update as suggested
155		15.02.260		Please include information about what hearings are required for the mitigation process. I.e., how does the public stay informed? For project activities, is a public hearing held before the Planning Commission or Hearing Examiner to look at the project mitigation? For non-project activities, how would the public stay informed as to potential impacts to critical areas? In the event of destruction of a critical area, who would have 'standing' to appeal a decision?	RCW 36.70B and BCC Title 17 direct the public hearing requirements for all project permit applications. Hearings will be limited to the requirements of those regulations. Projects that do not require a public hearing but may require review under the State Environmental Policy Act (SEPA) would be subject to the public notice requirements directed by SEPA and Benton County Code. The public is encouraged to review the county webpage, and the newspaper record for public notices and the Washington State SEPA Register for public information related to development actions currently under consideration by Benton County. In instances where critical areas are impacted outside of a permit process, the County's Code Enforcement requirements would be implemented. These processes do not require public notice nor

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					hearing, but the public is further encouraged to reach out to the Community Development Department to inquire about suspected damage to critical areas and if warranted file a Request for Code Enforcement Investigation.
156	WDFW Scott Downes March 2025	**Critical Areas Checklist** FWHCA definition BCC 15.02.070(23)		Recommend inclusion of WDFW PHS program as it has been recognized as a form of BAS for FWHCA.	Updated as suggested, and reflected in the latest draft code section on the County website
157		Recent updates/resources Fish & wildlife habitat		In addition to these resources, WDFW has a Land Use planning website that has good additions for wildlife connectivity and climate. Recommend including these resources as well: Land-use planning priorities and resources | Washington Department of Fish & Wildlife	Thank you for the suggestion; this information was reviewed and considered in CA updates and the completion of the CAO checklist.
158		Riparian Management Zone Checklist for CAOS (2023) for additional potential changes		Appreciate the updates. WDFW recommends using the RMZ checklist as it incorporates WDFW Riparian Guidance as BAS. That guidance lists all water courses in the Columbia Basin at a minimum width of 100 ft (Type F and Type N).	Thank you for the suggestion; this information was reviewed and considered in CA updates for Fish & Wildlife Habitat Conservation Areas.
159		Shrub steppe management recommendation		The definition was updated in 2020 to incorporate fire impacts to shrubsteppe. WDFW recommends updating the CAO definition to match the updated PHS definition.	Update as suggested in the CAO and noted in the checklist.
160		Regulation review regarding changes in species listing		Since the last update, several wildlife species have had their listing status changed including Ferruginous Hawk (uplisted to endangered) and while no current known populations in Benton County, Greater Sage-grouse (also upgraded to endangered).	Thank you for providing this information. We reflected these changes in the CAO checklist.
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162		Non-regulatory measures to protect or enhance functions		In addition to these measures which WDFW supports, consider adding in support of wildlife connectivity https://wdfw.wa.gov/species-habitats/habitat-recovery/connectivity/action-plan and shrubsteppe restoration through WSRRI https://wdfw.wa.gov/species-habitats/habitat-recovery/shrubsteppe	Thank you for providing this information. We used these sources extensively in several related efforts for the draft CA code update and open space planning.
163	WDFW Scott Downes 11/14/2025	15.02.070		15.02.070. Definitions: 22. Fish and Wildlife Habitat Conservation Areas. The definition does not explicitly reference WDFW Priority Habitats and Species (PHS), though the FWHCA section later in the document does. Please add PHS reference in the definition. 61. Riparian Management Zone (RMZ). Please add reference to the full WDFW definition. Shrubsteppe. Recommend adding a definition for shrubsteppe. WDFW PHS definition can be found here and is the recommended definition to use: https://wdfw.wa.gov/sites/default/files/publications/00165/wdfw00165.pdf Page 267.	Update as suggested
164		15.02.200		15.02.200 Mitigation requirements: 1. Mitigation Ratios and Functional Accounting The CAO should specify that compensatory mitigation ratios must be greater than 1:1 to address temporal losses, functional	Update per item as described in the following responses:

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				uncertainty, and performance risk. Credits and debits should be based on a scientifically valid measure of habitat function, value, and area, consistent with WDFW POL-M5002 §1 & §27. 2. Activity-Specific Ecological Uplift Mitigation activities (re-establishment, rehabilitation, enhancement, preservation) should be distinguished by their expected ecological uplift, ensuring that the degree of functional gain is proportional to the magnitude of impact. WDFW recommends incorporating language that requires mitigation actions to demonstrate measurable functional improvement based on best available science. 3. Mitigation Hierarchy and Location Clarify the preferred sequencing and location/type hierarchy: 1. On-site / in-kind → 2. Off-site / in-kind → 3. On-site / out-of-kind → 4. Off-site / out-of-kind. Off-site or out-of-kind mitigation should only be approved when it can be shown to provide equal or greater biological functions and values than on-site, in-kind options (WDFW POL-M5002 §6–8). 4. Mitigation Mechanisms The CAO does not identify acceptable mitigation delivery mechanisms. WDFW recommends clarifying whether permittee-responsible, in-lieu fee, or mitigation banking (per WAC 173-700) options will be recognized, and ensuring that all follow the same sequencing and functional accounting framework. 5. Monitoring, Timing, and Adaptive Management Mitigation should be implemented before or concurrent with construction, with function-based performance standards and monitoring that continues until success criteria are met (not simply a fixed duration). Delayed or unsuccessful mitigation should require additional compensation or corrective actions. 6. Long-Term Site Protection and Financial Assurance WDFW recommends requiring permanent or project-life protection (e.g., conservation easement or deed restriction) for mitigation areas and financial guarantees covering full costs + an additional percentage for implementation, monitoring, and contingency. The conservation easement or deed restriction should be held by a third party. 7. Cumulative Impacts Consideration Explicitly require evaluation of cumulative impacts at the watershed or landscape scale to ensure that "no net loss" is achieved collectively across projects.	1 – 6; Updated as suggested, and reflected in the latest draft code section on the County website 7 – Cumulative impacts are considered in the Comprehensive Plan EIS and also in the County proposed shrubsteppe mitigation program. See also response to Comment #123 and #153.
165	WDFW Scott Downes March 2025	15.02.210		15.02.210 (f) Mitigation sequencing. Please add "fish and wildlife" to the habitat conservation areas to clarify the name.	Updated as suggested, and reflected in the latest draft code section on the County website
166		BCC 15.14.040(g) Regs. Protecting waters of state		See WDFW Riparian Vol. 2 where it states that the RMZ is a critical area, not just a buffer of the stream. WDFW recommends incorporating this into the BAS.	Updated the CAO checklist to reflect this and also made commensurate changes in the draft CA code updates.
167		Non-regulatory measures to protect or enhance functions		In addition to these measures which WDFW supports, consider adding in support of wildlife connectivity https://wdfw.wa.gov/species-habitats/habitat-recovery/connectivity/action-plan and shrubsteppe restoration through WSRRI https://wdfw.wa.gov/species-habitats/habitat-recovery/shrubsteppe	Thank you for providing this information. We used these sources extensively in several related efforts for the draft CA code update and open space planning.

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168	Debbie Berkowitz July 1, 2026	Section IIB. Comments on CAO 15.04 Wetlands		Table 15.04.040-1 'Wetland Buffer Width Requirements' needs to be labeled as requiring a protected habitat corridor (it's confusing otherwise). It is also not clear why the wetland buffer wouldn't be the same as the required minimum 100ft protected habitat corridor.	Update table title to include habitat corridor. The wetland buffer is prescribed by Ecology BAS based on habitat function scores and wetland ratings.
169				Table 15.04.040-2 a. Lights - should also apply to parks and recreation, including sports areas when not in use. b. Noise -should also apply to parks and recreation when not in use. Fencing should be wildlife-friendly.	Update as suggested
170				15.04.040 (c)-If buffer widths are expanded because of buffer averaging, the additional width should be protected in the same way that a regular buffer width is (e.g., deed restriction).	Agree – update to include this requirement – deed restriction or conservation easement or other mechanism to permanently protect.
171				15.04.050 (f) - "Greater ratios may apply ...from unauthorized alterations." Change 'may' to 'shall' to discourage unauthorized alterations.	The existing language provides flexibility to respond based on specific conditions of the situation.
172		15.14.010		15.14.010 (c). There are creeks that are natural and convey irrigation water. Please add to the first sentence "wholly man made" in front of artificial features.	Updated as suggested, and reflected in the latest draft code section on the County website
173		15.14.~~030~~ (040)		15.14.030 (c). WDFW has noticed that some projects do not submit a critical areas report with the SEPA application. We believe this report should be a part of a complete application and SEPA review, including proposed mitigation actions. Please include a requirement that this report should be included as part of a complete application if there are potential critical area impacts on the projects.	Updated as suggested, and reflected in the latest draft code section on the County website. *[Note that the section #s changed and this is now in Section 15.14.040(c)]*
174		15.14.~~040~~ (050)		15.14.040 (e). Please add "no net loss" under the performance standards of mitigation to ensure the language is consistent with the GMA statute.	Updated as suggested, and reflected in the latest draft code section on the County website. *[Note that the section #s changed and this is now in Section 15.14.050]*
175		15.14.~~040~~ (050)		15.14.040 (g): Riparian RMZs: WDFW Riparian Guidance (which is considered as Best Available Science) recommends a minimum of 100 ft for all RMZs in Benton County and greater if the Site Potential Tree Height exceeds 100 ft (possible in some areas along larger rivers with cottonwoods). Our guidance does not make exceptions for slope as is currently indicated in the proposed CAO language. WDFW recommends extending all RMZs to a minimum of 100 ft and removing the slope considerations.	Updated as suggested, and reflected in the latest draft code section on the County website. *[Note that the section #s changed and this is now in Section 15.14.050]*
176		15.14.~~040~~ (050)		15.14.040. Fish and Wildlife Habitat Conservation Areas c) It should be clarified to ensure consistency with the County's general mitigation provisions in BCC 15.02.210–.230 and WDFW Policy M-5002. The general provisions correctly prioritize *in-kind, on-site* mitigation, whereas 15.14.040(C) could be interpreted as encouraging *off-site* mitigation for connectivity purposes without demonstrating that it provides greater biological function or value. WDFW recommends revising 15.14.040(C) to state that mitigation sites may be located off-site to support habitat connectivity only when it can be demonstrated that such siting achieves equal or greater ecological function, value, and long-term viability than on-site mitigation, consistent with Policy M-5002. e) Mitigation and Equivalent or Greater Biological Functions. Please add "fish and wildlife" to the habitat conservation areas to clarify the name.	Updated as suggested, and reflected in the latest draft code section on the County website. *[Note that the section #s changed and this is now in Section 15.14.050]*

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177	Debbie Berkowitz July 1, 2026	Section IIC. Comments on CAO 15.14 Fish and Wildlife Habitat Conservation Areas		I. 15.14.010 (a) Please consider adding the following to FWHCAs: • Riparian Management Zones • The areas listed as a national wildlife refuge, national park, national monument, natural area preserve; • Badger Mountain Preserve; • Candy Mountain Preserve; • Category I wetlands; • documented habitat of threatened, endangered, or sensitive species; • documented habitat of regional or national significance for migrating birds (these are areas that help maintain biodiversity)	Update as suggested, except for documented habitat of T, E & S species – covered by (i) and (ii) and the last bullet. These habitat areas are often already covered by CAO protections whether specifically documented or not.
178		15.14.010(d)		Consider adding 15.14.010(d) (to augment the reasons why FWHCA's are important beyond section 15.02.010) "Fish and wildlife habitat conservation areas are intended to: (1) Create a system of fish and wildlife habitat with connections between larger habitat blocks and open space, integrating with open space corridor planning where appropriate; (2) Limit the level of human activity within such areas that is appropriate for certain areas and habitats, including presence of roads and level of recreation type (passive or active recreation); (3) Protect riparian ecosystems including potential for restoring lost or impaired salmonid habitat; (4) Evaluate land uses that may negatively impact these areas, or conversely, that may contribute positively to their function; (5) establish buffer zones around these areas to separate incompatible uses from habitat areas; (6) promote biodiversity in part by preserving local gene pools of seeds/insects/other species."	Update as suggested.
179		15.14.020		Thank you for adding 15.14.020 'Designation of habitats and species of local importance.' Please consider adding an introductory paragraph "A process is provided for listing other habitats and species that are important locally to the people of Benton County. This action may be initiated at the request of WDFW, other government agencies, County staff, nonprofit organizations, or interested citizens." The current definition in 15.02.070(72) should be changed to better take into account the various criteria that are considered in this new section (perhaps "Those species that are important locally to the people of Benton County")	No planned updates on this language. Interested citizens can reach directly to the Planning Official to present their case for consideration.
180		15.14.020(a)		Section 15.14.020 describes in detail Benton County's criteria for designating habitats and species of local importance, but it does not include requirements for de-designation. Please include statements that cover the following requirements: "All of the criteria listed for designation shall be required for de-designation" and specifically, that "all the designation criteria in subsection (b) no longer apply and reasons are given" (e.g., the species is no longer vulnerable or is otherwise protected). Also, add that "WDFW should be consulted when the de-designation process is started."	Update as suggested
181		15.14.020(b)(1)(iii)		'hydrological functions ' add "where applicable" (since these sections are listed as requirements but hydrological functions are not applicable to all FWHCAs).	Update as suggested
182		15.14.020(b)(2)(v)		'special value' should include "such as public appeal."	Update as suggested
183		15.14.020(c)		'Proposals shall be reviewed by the County and be forwarded to WDFW....' WDFW and other agencies should be involved in this review as they are the experts and can bring to bear BAS. Please change 'may' to 'should" (and add definitions of 'may', 'should ', 'shall' to 15.02 definitions- see comment re 15.02) for both designation and de-designation.	Update as suggested, both for this section and definitions.
184		15.14.040(a)		see comment re 15.02.070(56)(i) (definition of qualified professional for fish and wildlife habitats).	See response to comment (#128)

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185		15.14.040 (c)(7)		When appropriate due to the type of habitat or species present or project area conditions, the planning administrator also require...to include a request for consultation....' Please change 'may' to "shall." Consultation with WDFW is critical for appropriate habitat assessment and implementation of no net loss provisions. The statement already indicates that this consultation is appropriate due to the type of habitat or species present. This assessment should also be built into any project or activity assessment as part of SEPA. If there are some limited exceptions where consultation with WDFW may not be required, these exceptions should be specified in 15.l4.040(c) and otherwise consultation shall be required....	Appreciate the comment, however, no change is planned as this is really more specific to the situation, and often consultation is not required. And specifying WDFW only for a wetlands condition would exclude Ecology and sometimes other agencies may also be consulted, such as USACE. Prefer to keep this more broadly written that allows more tailored and less prescriptive implementation.
186		15.14.050(d)		'Conditions shall be based on the BAS and 'may' include but are not limited to....' Please change 'may' to "should". 'Should' implies that implementation is expected, but gives leeway if circumstances make an activity inappropriate (see suggested definition in 15.02.070).	Update as suggested
187		15.14.050 (d)(3)		Please add 'wildlife-friendly' to fencing.	Update as suggested
188		15.14.050 (d)(5)		If this is for mitigation, monitoring should be in perpetuity.	Monitoring will continue per the required performance period; in some cases it may be in perpetuity but not in all cases. Keep language as is.
189		15.14.050(g)(l) and (g)(2)		"Documented through site-specific or river/stream area specific conditions as established through local studies that meet BAS criteria." Please note that "Local studies to determine RMZ width based on pollutants should include appropriate pollutant transport measurements on local streams by a hydrologist qualified in pollution studies that meet BAS criteria."	This suggestion is not necessary and too focused just on water quality while ignoring other factors. Additionally, the County has increased the minimum buffers to 100 feet per the State Riparian guidance for the Columbia Basin. Keep language as is.
190		15.14.050(g) (2)(ii)		Glad to see the change to 100 feet. Please add "a minimum of ' 100ft. as per WDFW Riparian Ecosystems, Volume 2: Management Recommendations (Rentz et al, Dec. 2020). Also add "This distance should be greater if there are steep slopes or poorly drained soils or high intensity land uses." (ibid). Also, consider adding: "Areas of heavy pesticide or fertilizer use should also be considered high intensity land uses in this context as they add more pollutants to the soil and should require larger RMZs". It should be noted that this number considers only the pollution removal function (i.e., aquatic functions) and does not specifically consider upland wildlife needs in an RMZ, including wildlife connectivity; if these were to be considered, the RMZ could be considerably wider. The RMZ should also include the possibility of using Site Potential Tree Height if this exceeds 100 ft.	See response to Comment 194 and 239, one of several other comments addressing Site Potential Tree Height
191		15.14.050(g)(3)		In this section, RMZ averaging should explicitly take into account minimizing the impact on wildlife corridors that are part of or adjacent to the RMZ.	Update to include in item (i) It will not reduce riparian functions or functional performance <u>of other PHS habitat(s) part of or adjacent to the RMZ, as applicable;</u>
192		15.14.050(g)(3)		Please add: "If RMZ (or other buffer) averaging is used, it should be maintained in an undisturbed vegetated state consistent with its intended ecological functions and monitored in perpetuity as part of a conservation easement." It would be too easy to lose track of the agreed-upon buffer zone otherwise	Updated to include permanent protection.

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193		15.14.050(g) (insert between (3) and (4)		The equivalent section to 15.04.040(b)(6) should be added for FWHCAs, i.e., Increased FWHCA, including RMZ, buffer widths. E.g., "The Planning administrator should require increased buffer/RMZ widths on a case-by-case basis when a larger buffer is necessary to protect FWHCA functions and values based on site-specific characteristics."	Update as suggested
194		15.14.050(g)(4)		Add to 'from the OHWM"' or the CMZ where one exists." ' In the case where waterbody is adjacent to a steep slope or bluff,' add "the RMZ would be increased beyond the 100ft minimum to take into account the increased potential for pollution runoff and the possibility of erosion or sloughing as determined by a qualified professional hydrologist and geologist, respectively." Question- Would slopes less than 15% also impact the surface or subsurface hydrology of pollutant runoff?	Update as suggested for OHWM or CMZ, as applicable, and increasing beyond minimum 100 feet for steep slope areas. Regarding the questions of slope, the 15-percent slope threshold is from Washington Administrative Code (WAC) 365-190-120, which establishes minimum classification standards for geologically hazardous areas under the Growth Management Act (GMA). The question about impacts on pollutant runoff is a question for WDFW based on their science synthesis in the Riparian Vol. 1 Guidance manual - Quinn, T., G.F. Wilhere, and K.L. Krueger, technical editors. 2020. Riparian Ecosystems, Volume 1: Science Synthesis and Management Implications. Habitat Program, Washington Department of Fish and Wildlife, Olympia..
195		15.14.050(g)(5)		Change ' may' to "should" in all three instances.	No change as this is dependent upon site specific conditions, species and type of proposed activity. May is more appropriate.
196		15.14.050(h)		Please add a section to discuss buffer zones for non-riparian areas- criteria, widths, etc.- e.g., for shrub steppe habitat, other PHS/candidate species and habitats. This section should include the possibility of increasing buffer widths if a larger buffer is necessary to protect FWHCA functions and values. The brief mention under 15.40.040(g)(4)(ii) isn't clear and doesn't really cover non-riparian buffers.	Update 15.40.040(g)(4)(ii) to read: (ii) Buffers for other PHS habitat types that are also within or adjacent to the proposed action area shall be identified in a critical areas report and be consistent with best available science. These buffers shall be measured in all directions from the habitat boundary, as mapped by the Washington State Department of Fish and Wildlife or a qualified professional pursuant to BCC 15.14.030(a).
197		15.14.060(b)(l)		Further reference should be made to mitigation sequencing and the strong preference for avoidance, minimization, etc. (discussed in 15.02.220). It should be emphasized that offsite, compensatory mitigation is the last stage of mitigation sequencing and is not the preferred stage. As in wetlands, offsite compensatory mitigation should be allowed only when such siting can be demonstrated to achieve greater ecological function and value, and longterm viability than on-site mitigation. Department of Fish and Wildlife POL-M5002 (1999) should be followed in the discussion in 15.14.060(b), including the following: a. In the long-term, WDFW shall seek a net gain in productive capacity of habitat through restoration creation, and enhancement. Mitigation credits and debits shall be based on a scientifically valid	Mitigation sequencing, as provided in Section 15.02.220 provides adequate discussing of the preferential process and it is unnecessary to duplicate this description in this section. The principles of POL-M5002 are incorporated into the draft shrubsteppe mitigation program

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				temporal losses, uncertainty of performance, and differences in functions and values. b. For offsite mitigation to be accepted, the project proponent must demonstrate to WDFW's satisfaction that greater habitat function and value can be achieved off-site than on-site. c. Delayed mitigation shall include replacement that is greater than losses. Mitigation that is implemented after project construction, or that requires a long time to reach replacement value, shall include additional habitat value (over and above replacement value) equal to the loss through time. d. WDFW shall determine impacts and mitigation.	goals, description and methods, and WDFW is a cooperative partner in this effort.
198	Debbie Berkowitz continued	15.14.060(b)(2)		It should be stated that WDFW is currently working on an update for PHS shrubsteppe management recommendations, including guidance for mitigation ratios and banking credits/debits and that these will be incorporated into this program when they become available since they are an important source of best available science. See other comments below.	This information is noted in the Monitoring and Adaptive Management section of the draft shrubsteppe mitigation program.
199		15.14.060(b)(3)		This discussion considers spatial priority from WSRRI but does not take into account WAHCAP (Washington Habitat Connectivity Action Plan, wdfw02630, 2025) comments about local areas and urban areas. While WSRRI downplays 'other habitat' or 'other PHS shrubsteppe,' WAHCAP (P. 15, 16, 94) states that 'Many smaller habitat areas (e.g., urban riparian areas, parks, or isolated forest patches did not appear as statewide priorities even though they are critical to supporting wildlife and ecosystem functions at the local scale. ' [this could be expanded to include shrubsteppe patches}. 'We encourage local conservation practitioners and land managers to use the WAHCAP as a starting point and use additional data to delineate priority locations for connectivity at the local level ... ' 'Across all spatial scales- statewide, regional, and local- riparian corridors emerge as crucial conservation features, particularly in fragmented or human-dominated landscapes. Stream and river corridors often retain continuous strips of vegetation...making them natural pathways for wildlife movement through otherwise fragmented habitat. Protecting and restoring riparian areas supports both aquatic ecosystems and terrestrial wildlife movement. ' 'Additional fine-scale planning is needed to fully identify regional and local priorities (for connectivity).' I urge the County to take into account the above statements from WAHCAP in considering the importance of urban areas for habitat and habitat connectivity (see additional comments for Shrubsteppe Mitigation Program, specifically #6)	WAHCAP data is directly included in the datasets compiled to support the draft shrubsteppe mitigation program, and this layer will be shared with the County for ongoing administration of the program, once established. Because WAHCAP is mapped at a broader spatial scale, WSRRI and WDFW Biodiversity Areas and Corridors were used as the primary spatial-priority datasets.
200		15.14.060(b)(3) and (4)		There appears to be no requirement that WDFW have input into the critical area report provided by the applicant or the calculation of debits/credits. WDFW must be given a significant role in these discussions, more than the standard two-week review.	WDFW has been closely coordination with in developing the draft shrubsteppe mitigation program, will be involved in identifying and establishing a mitigation property, developing a property management and restoration/enhancement plan and in ongoing review of annual performance reports and restoration monitoring efforts. We believe WDFW participation in the launching and ongoing implementation of this program, combined with their typical review process for critical area reports will provide ample opportunity or input and oversight of local program administration efforts.
201		15.14.060(b)(6)		Please add-"Annual monitoring and reporting shall be done in perpetuity."	Update as suggested

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202		15.14.060(b)(Tab1e 1)		This table assumes that all mitigation properties will be restored. High quality mitigation properties should generally be protected, not restored. Restoration is more likely to result in damage to high quality shrub steppe. Preservation of high or even good quality habitat should require significantly higher ratios than are given in table 1 since such habitat is essentially irreplaceable.	An updated draft shrubsteppe mitigation program has revised tables for mitigation and compensation ratios, which addresses this comment.
203		15.14.060(b)(Table 1)		This table assumes that mitigation properties will be restored to high reference quality. Since we don't know how to restore the cryptogamic soil crust, it is not possible to restore to a high reference quality (which 'represents the natural and resilient state of the ecosystem).' Even restoring to a 'near reference' or 'slight departure' would be difficult. Since we are unlikely to achieve high reference quality, mitigation ratios need to be higher than 1:1 (also per WDFW POL-M5002).	An updated draft shrubsteppe mitigation program has revised tables for mitigation and compensation ratios, which addresses this comment, except for the cryptogamic soil crust, where as noted it is not possible to restore to a high reference quality.
204		15.14.060(b)(Table 1)		Assumes that the cost paid by the developer in advance will be sufficient to purchase the land, restore it, monitor, and maintain it. Current costs of $3,500 to $4,000 per acre are unlikely to be sufficient to even restore the mitigation property (e.g., WE Johnson is underfunded at $3,500 per acre just for restoration). What are the consequences if the restoration process doesn't meet its goals? Who pays for the additional restoration to meet those goals?	Costs for credit purchase and the basis for these are still under development. You are correct that restoration costs alone could be several thousand per acre. In the draft program, it is envisioned that a long-term stewardship fund will be established from part of the proceeds from each transaction, and these funds would be used to address restoration shortfalls in meeting goals.
205		15.14.060(b)(Table 1)		How are fire-disturbed areas taken into account? Many have the potential for recovery, especially if they are restored soon after a fire occurs. Note, for example, WDFW studies related to caching sagebrush in areas that have recently been subject to fires.	In the draft program, it is envisioned that the long-term stewardship fund will be established from part of the proceeds from each transaction, and these funds would be used to also address restoration needs resulting from fire disturbance on the mitigation property.
206		15.14.060(b)(Table 1)		If one compares this table to Table I5.04,050-1 or 2, the discrepancy between compensatory ratios required for wetlands and those for shrub steppe are noteworthy and need to be explained.	Shrubsteppe mitigation is a relatively new consideration compared to wetlands mitigation, and has much less scientific study, literature and practical experience supporting it. We have worked closely with WDFW in developing an updated draft shrubsteppe mitigation program with revised tables for mitigation and compensation ratios. These are nearly identical to those WDFW provided to Grant County to consider in developing their program, except for a 6:1 replacement ratio for _preservation_compared to an 8:1 ratio WDFW suggested, and an added 4:1 ratio for preservation with enhancement & long term resilience. We expect ratios to evolve and refine over time as a stronger technical foundation is established. The range of possible impact and

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					mitigation ratios has been expanded from the table provided in the review draft Critical Areas code section.
207		15.14.060(b)(general)		While I am happy to see that the County is looking seriously at shrub steppe mitigation, based on my comments above on 15.14.060(b), it appears that there are more factors to be taken into account before section 15.14.060(b) in general, and especially Table 1, can be considered to be based on BAS. Two factors that should be taken into account: 1) WDFW is working on guidance for PHS shrubsteppe management recommendations including mitigation ratios and banking credits/debits based on BAS and is hoping to have a document ready by the end of this year. Given the complexity of this process and the need to incorporate best available science, it is not surprising that it is taking them longer than expected. (2) The Comprehensive Plan isn't due until the end of this year and the CAO isn't due until 6 months after that, so there is time to adjust the mitigation ratios to take into consideration the work that WDFW is currently doing. Waiting to adopt the CAO to include their input is the best way to make sure that this part of the CAO is based on BAS. Section 15.14.060(b) should reference the "Shrubsteppe Mitigation Program or as revised in the future."	Update as suggested. It is assumed the program document will be reviewed and updated periodically to reflect new information.
208		15.14.060(b)		In an earlier iteration of this document, there was a proposal for a 'mitigation review team. ' That seemed like a good concept, especially as the shrub steppe mitigation program is being started. Is that still under consideration and what would be the composition of the team?	There is a mitigation program development team that has replaced the review team. It was felt that the mitigation review team process would be too cumbersome for meeting permitting timeline requirements. The program development team, which includes WDFW, is working to set the program up to meet the no net loss objectives and then would meet periodically to review and consider updates to strengthen the program during implementation.
209		15.14 general.		There should be a list of activities that are regulated in FWHCAs equivalent to that in wetlands, e.g., altering vegetation.	See response to Comment #210
210		15.14 general		WDOE's "Wetland Guidance for CAO (Western and Eastern Washington)" Oct. 2022, Publication #22-06-014, Appendix A, Sample Wetland Regulations 030.b containing regulated activities should be applied to FWHCAs as well as wetlands. The light, noise, etc. categories are equally important for FWHCAs.	Agree many of these activities would also be regulated in FWHCAs and RMZs, including removal of soil/grading/excavation, dumping or adding fill, constructing or removing structures and vegetation alterations (many types), and will be added to 15.14.050 (a) as examples of types of alterations. Please also see 15.02.070 (3), which includes a definition of Alteration as well, which lists some of these items as well.
211		15.14 general		The County might consider starting a conversation about "Lights Out During Migration" as well as Bird-Friendly Buildings- programs that help reduce the number of birds killed, especially during migration. Local studies have been done at WSU-Tri-Cities; information is available through the American Bird Conservancy and the National Audubon Society as well as its local chapter.	Comment noted. This seems like a more appropriate role for a local non-governmental organization to lead up. The County would be open to supporting such an effort, as resources allow.
212	Patrick Paulson	15.14.050 (e)		Replace the term "no-net loss" with "no net loss" in Draft CAO 15.14.050 (e).	Thank you for the suggestion; we will pass this along to our editing team

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213				Please add “fish and wildlife” to the habitat conservation areas to clarify the name. Likewise, ‘fish and wildlife’ should be added to all occurrences of ‘habitat conservation area’ to ensure consistency and clarity. Some locations where this edit can be applied: Draft CAO 15.14.040.b.2, 15.14.040.c, 15.14.050.a (2 occurrences), 15.14.050.d-g (4 occurrences), and 15.14.060.a.	Update as suggested
214		15.02.110, Best Available Science		Draft CAO§ 15.02.110, Best Available Science The organization of this section is a little confusing, because items (1)-(6) under paragraph (c) are all drawn from WAC 365-195-905.a, but item (7) corresponds to WAC 365-195-920 (1)(a). We suggest renumbering item (c)(7) as paragraph (d): (6) References. The assumptions, analytical techniques, and conclusions are well referenced with citations to relevant, credible literature and other pertinent existing information. (7d) Absence of Valid Scientific Information. Where there is an absence of valid scientific information or incomplete scientific information relating to a critical area leading to uncertainty about the risk to critical area function of permitting an alteration of or impact to the critical area, the Planning Administrator shall take a "precautionary or a no-risk approach," that strictly limits development and land use activities until the uncertainty is sufficiently resolved.	Update as suggested; yes this was a formatting error. Apologies for the confusion.
215		15.02 – various sections (and 15.14.010)		CAO General Provisions Note and Riparian Management Zones and Fish and Wildlife Habitat Conservation Areas We noticed that a lot of the textual updates to the Draft CAO and many of our comments pertain to the inclusion of protection of Riparian Management Zones (RMZ) into various provisions. Under the Draft CAO one could argue many of these updates are unnecessary: Priority Habitats and Species (PHS) identified by the Washington Department of Fish and Wildlife (WDFW) are designated as Fish and Wildlife Habitat Conservation Areas (FWHCA), ‘Riparian habitat’ is PHS5, and RMZs provide protection for riparian areas. But this linkage is not obvious, and it is not clear that the terms ‘Riparian Management Zone’ (“the area that has the potential to provide full riparian functions”6) is synonymous with “Riparian Habitat”. Because of this uncertainty it makes sense to specifically including RMZ as areas to be protected. But a much better solution would be to clearly designate Riparian Management Zones as FWHCA in Draft CAO §15.14.010 as recommended by WDFW. 5 Washington Department of Fish and Wildlife. 2008 (Updated June 2023). Priority Habitat and Species List (PHS List). Olympia, Washington. “Riparian habitat encompasses the area beginning at the ordinary high water mark and extends to that portion of the terrestrial landscape that is influenced by, or that directly influences, the aquatic ecosystem.” (p. 265). 6 Draft CAO §15.02.070.60. 7 Rentz, R., A. Windrope, K. Folkerts, and J. Azerrad. 2020. Riparian Ecosystems, Volume 2: Management Recommendations (Riparian Recommendations). Habitat Program, Washington Department of Fish and Wildlife, Olympia. Attached to these comments as “Rentz et al. 2020.pdf”. https://wdfw.wa.gov/sites/default/files/publications/01988/wdfw01988.pdf. “WDFW recognizes riparian ecosystems as a Priority Habitat for fish and wildlife and recommends that local jurisdictions designate those ecosystems as Fish and Wildlife Habitat Conservation Areas (FWHCAs), a type of critical area.” (p. 10).	The point you make is a good one. Where buffer was struck out and replaced with RMZ or other habitat buffer is probably an unnecessary and even possibly confusing edit. RMZs, as you point out, are critical areas – one type of habitat as part of FWHCAs. Therefore, we will remove this edit in multiple locations and stick with the original language of “critical areas or buffer,” which by definition includes RMZs. Clarifications will also be made to note that RMZs are a habitat type in FWHCAs in Section 15.14.010.
216		Section 15.02.070		Definitions	Update with this definition: **Hazardous Tree:** *“Trees with significant structural defects that are likely to lead to failure.”*

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				Define the term 'Hazard Tree' as recommended by WDFW (Item N). The following definition is given in Riparian Recommendations (p. 65): Hazard Tree– A tree that a jurisdiction's building official or other recognized professional (e.g., certified arborist, registered landscape architect, or certified forester) has determined poses a near-term hazard to public safety or to an existing permanent structure or public utility.	
217		15.02.130.b		Please consider the following suggested text for Draft CAO §15.02.130.b: All exempt activities must use reasonable methods to avoid potential impacts to critical areas and buffers. In every case, disturbance to the critical area must be minimized through best management practices and the use of low-impact equipment.	Update first sentence in this section to read: "All exempted activities shall avoid potential impacts to critical areas and buffers." The rest of the suggested detail to add may be too prescriptive in certain situations.
218	Patrick Paulson Laurie Ness July 2,2026	15.02.130 (b) (1) (ii)		The Draft CAO 15.02.130 (b) (1) (ii) requires that Add a requirement that the mitigation be monitored for a suitable period time to ensure its success. Further, make it clear that the 'review' requires a SEPA determination. Here's a possible edit: (ii) After the emergency, the person or agency undertaking the action shall fully fund and conduct necessary restoration and/or mitigation for any impacts to the critical area and buffers/RMZ resulting from the emergency action in accordance with an approved critical area report and mitigation plan. The person or agency undertaking the action shall apply for review, and the alteration, critical area report, and mitigation plan shall be reviewed by the County in accordance with the review procedures contained herein. The county shall make a formal SEPA determination as specified by Benton County Code Chapter 6.35 (Environmental Policy).	Update the SEPA suggested language to read: "The county shall issue a SEPA threshold determination for instances when a determination is required by BCC 6.35 and WAC 197-11."
219		150.02.130 (b) (4) (ii)		Please include RMZs in the section limiting 'Existing and ongoing agricultural activities' in Draft CAO section 150.02.130 (b) (4) (ii): (ii) Fish and wildlife habitat conservation areas and Riparian Management Zones. Existing and ongoing agricultural activities do not include tree cutting, road building, new agriculture, clearing, earth moving, mining, filling, burning or construction of buildings or other facilities in fish and wildlife habitat conservation areas including riparian management zones.	By updating the description of FWHCAs to specifically include RMZs (see response to comment #166 above), then it is unnecessary to also call out RMZs here.
220		15.02.130 Hazard Trees		Add consideration of 'hazard trees' to the exemptions for Emergencies and Operations, Maintenance and Repairs. Language could be added onto Draft CAO §15.02.130. This language is adapted from text from Riparian Recommendations:[10] (c) Exempt activities and Hazard trees and snags within RMZ, Wetlands and their buffers, and FWHCA and their buffers. A determination of whether a tree presents a hazard shall be made by a qualified arborist and submitted in a hazard tree determination report. Snags (dead trees) are a Priority Habitat feature for wildlife [11]. To maintain functions and values of these critical areas, snags shall be preserved, when possible, when removing or trimming hazard trees. The removal of vegetation from hazard trees shall be the minimum necessary to remove the hazard. When removing the hazard, damage to remaining trees and vegetation will be avoided if possible and minimized if necessary. (1) Hazard Tree Determination Report means a written document prepared by an certified arborist containing the following elements. (i) Parcel, address, and name of landowner of site where tree(s) are located (ii) Description of size, health, and species of tree(s) evaluated; (iii) Alternative methods (pruning, cabling, etc.) considered;	Update as suggested, with some minor editing to simplify description

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				(iv) Location of nearby critical areas (wetlands, streams, steep slopes, floodplains, shorelines, fish and wildlife habitat conservation areas, RMZ and biodiversity corridors; (v) Proposed methods for removal include types of heavy machinery, if applicable; (vi) Size and species of native replacement trees; (vii) Site map showing parcel lines, structures, evaluated trees, critical areas, utilities, and other pertinent information described in the report; (viii) Date of field evaluation and signature of arborist; (ix) Qualifications of arborist authoring the report 10 "Specifically, we recommend that any removal of hazard trees involve an avoidance and minimization of damage to remaining trees and vegetation within the …it is important to note that snags (dead trees) are a Priority Habitat feature for wildlife, and so should be preserved if not hazardous. 11 HS List, p. 287.	
221		15.02.130		Ongoing agricultural activities Please consider the following edits to Draft CAO §15.02.130 for consistency and clarity (just tried to integrate the lists of activities where it made sense, using the same wording). (4) Existing and ongoing agricultural activities, provided they implement applicable Best Management Practices (BMPs) contained in the latest editions of the USDA Natural Resources Conservation Service (NRCS) Field Office Technical Guide (FOTG). (i) Wetlands. Existing and ongoing agricultural activities do not include removing trees tree cutting or removal, clearing or removal of vegetation, road building, mining, excavation, ditching, draining, culverting, filling, grading, burning, construction of buildings or other facilities, diverting or impounding water, or any similar activities excavation, ditching, draining, culverting, filling, grading, and similar activities that introduce new adverse impacts to wetlands or other aquatic resources and their buffers. Conversion of wetlands that are not currently in agricultural use, regardless of their wetlands rating, to a new agricultural use should be subject to the same regulations that govern new development. (ii) RMZs, FWHCA, and FWHCA Buffers. Fish and wildlife habitat conservation areas and RMZs. Existing and ongoing agricultural activities do not include tree cutting or removal, clearing or removal of vegetation, road building, mining, excavation or earth moving, ditching, draining, culverting, filling, grading, burning, new agriculture, clearing, earth moving, mining, filling, burning or, construction of buildings or other facilities, new agriculture, or any similar activities that introduce adverse impacts to fish and wildlife habitat conservation areas, their buffers, or RMZ..in fish and wildlife habitat conservation areas	Comment noted
222		15.02.130.b.2		Operations, Maintenance or Repair The activities not considered ongoing agricultural activities should also not be considered activities exempted for "Operation, Maintenance, or Repair. Update Draft CAO § 15.02.130.b.2: (i) Wetlands and their buffers. Operation, Maintenance, or Repair activities do not include tree cutting or removal, clearing or removal of vegetation, road building, excavation, ditching, draining, culverting, filling, grading, burning, construction of buildings or other facilities, diverting or impounding water, or any similar activities that introduce adverse impacts to wetlands or other aquatic resources.	Update with this language, as suggested.

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				(ii) RMZs, FWHCA, and FWHCA Buffers. Operation, Maintenance, or Repair activities do not include tree cutting or removal, clearing or removal of vegetation, road building, mining, excavation or earth moving, ditching, draining, culverting, filling, grading, burning, burning, construction of buildings or other facilities, or any similar activities that introduce adverse impacts to fish and wildlife conservation areas, their buffers, or RMZs.	
223		15.02.130.b.5		Storm Water Treatment facilities and artificial ponds should not be an allowed activity in wetlands, RMZ, or FWHCA. Strike Draft CAO §15.02.130.b.5, which allows stormwater facilities in critical areas. We wouldn't think this should be allowed in any critical area: not geological sensitive areas, CARAs, frequently flooded areas, and definitely not wetlands and their buffers, FWHCA and their buffers or RMZ. Wetland Guidance Appendix A gives example wetland regulations which allow stormwater facilities in wetlands only when specific conditions are met[12]. Stormwater facilities should not be allowed in critical areas when they impact the functions and values of the critical area. Update Draft CAO §15.02.130.b.5 to prohibit stormwater treatment from RMZ, FWHCA (and their buffers), and Wetlands (and their buffers). (5) In critical areas other than RMZs, Wetlands and their buffers, and FWHCA and their buffers, exempt activities include artificial structures intentionally constructed from upland areas for purposes of storm-water drainage or water quality control, or ornamental landscape ponds, which are not part of a mitigation plan as described and detailed in this chapter. 12 Washington State Department of Ecology. 2022. Wetland Guidance for CAO Updates, Western and Eastern Washington. Publication No. 22-06-014. October 2022. Shorelands and Environmental Assistance Program, p. A-7.	This is referring to artificial structures constructed in upland areas that will not impact critical areas, or part of a mitigation activity. It is appropriate to allow this activity without a permit in conditions where constructing it will not impact critical areas. No change.
224		15.02.150		Conditions for Reasonable Use Exception Change Draft CAO§15.02.150 to limit when a Reasonable Use Exception will be considered. These conditions are suggested in the Critical Areas Handbook[13]: (a) If the application of this chapter would deny all reasonable use of the subject property, the property owner may apply for an exception pursuant to this section. For a reasonable use application to be considered, the following conditions must be met: (1) No other reasonable economic use of the property has less impact on the critical area, (2) The proposed impact to the critical area is the minimum necessary to allow for reasonable economic use of the property, (3) The inability of the applicant to derive reasonable economic use of the property is not the result of actions by the applicant after the effective date of this regulation, or its predecessor, (4) The proposal does not pose an unreasonable threat to the public health, safety, or welfare on or off the development proposal site, (5) The proposal will result in no net loss of critical area functions and values consistent with the best available science, and (6) The proposal is consistent with other applicable regulations and standards. 13 Washington State Department of Commerce. 2026 (Accessed). Critical Areas Handbook (Critical Areas Handbook). Washington State Department of Commerce Growth Management Services, Olympia WA. https://deptofcommerce.app.box.com/s/rlysjrfvrxpxwnm9jvbcd3lc7ji19ntp. P. 11.	Update as suggested. These are more specific and updated conditions/criteria to apply.
225		15.02.160.g		Restrict trails in RMZs	See response to comment #144

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				Edit Draft CAO §15.02.160.g to ensure that trails aren't allowed activities in FWHCA and RMZ. Creating trails in these critical areas should require a critical-areas report to ensure no net loss of function and values. Here is an attempt to update the code: (g) Public and Private Pedestrian Trails. Public and private pedestrian trails, except in are not allowed in riparian management zones, wetlands or their buffers, or fish and wildlife habitat conservation areas, or their buffers, Public and private pedestrian trails in other critical areas are allowed, subject to the following:	
226		15.02.160g		Project Application should include Critical Areas Report (if required) before SEPA determination and shall be submitted for SEPA review WDFW Comments on Drafts notes: WDFW has noticed that some projects do not submit a critical areas report with the SEPA application. We believe this report should be a part of a complete application and SEPA review, including proposed mitigation actions. Please include a requirement that this report should be included as part of a complete application if there are potential critical area impacts on the projects. It wasn't clear to us that the Draft CAO requires that if a critical areas report is required it must be submitted with the SEPA determination. We would also like to see that required stormwater plans are submitted with the SEPA determination—stormwater handling shouldn't be tacked on later as it may impact critical areas	See Response to Comment #173 for the SEPA review part of this comment. Additionally, critical areas studies are required as part of a complete application when known in advance. Projects are placed on hold when critical areas are discovered to be present and no permit decision/approvals are rendered until critical areas are addressed. It is atypical that land use projects coming in for initial entitlement include sufficient engineering analysis to include stormwater handling/management. Projects are conditioned to comply with applicable stormwater standards, then during civil construction stormwater calcs and design are submitted and reviewed.
227		15.02.190 (c) (6)		Cumulative Impact Analysis WDFW commented: 7. Cumulative Impacts Consideration Explicitly require evaluation of cumulative impacts at the watershed or landscape scale to ensure that "no net loss" is achieved collectively across projects. The Draft CAO requirements for cumulative impacts in critical area reports for FWHCA is addressed solely by 15.02.1290 (c) (6): (6) An assessment of the probable cumulative impacts to critical areas resulting from development of the site and the proposed development; This requirement does not address the cumulative impacts at the watershed or landscape scale, so it cannot be determined if the proposed project are addressed to achieve no net loss at those scales.	See response to comment #123 and #153
228		15.02.210.e.4		"Out-of-kind" mitigation not allowed for Priority Habitats and Species	The County mitigation hierarchy as provided in this section is consistent with WDFW Mitigation Policy, where it states: Out-of-kind mitigation is

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				WDFW Mitigation Policy15 §6 states "Out-of-kind mitigation is not acceptable for impacts to priority habitats and species …", and further requires that: for off-site mitigation to be accepted, the project proponent must demonstrate to WDFW's satisfaction that greater habitat function and value can be achieved off-site than on-site. The Draft CAO allows off-site mitigation when it provides merely biological functions and values that are 'equal' to those provided by on-site mitigation. This is inconsistent with the preferred mitigation sequence: on-site mitigations are preferred to off-site mitigations. Possible update to Draft CAO §15.02.210.e.4 : 4) Off-site mitigation located in Benton or adjacent County with out-of-kind mitigation measures to offset the impacted functions Off-site or out-of-kind mitigation should only be approved when it can be shown to provide equal or greater biological functions and values than on-site, in-kind options). Out-of-kind mitigation will not be approved for impacts to WDFW Priority Habitat and Species associated with a Fish and Wildlife Habitat Conservation Area. Off-site mitigation should not be allowed outside of Benton County since this would result in a net-loss of ecological values within Benton County.	not acceptable for impacts to priority habitats and species, **with two exceptions**: (1) priority habitats and species that are at greater risk can be substituted for impacted priority habitats and species; and (2) for hydraulic projects, WDFW shall consider off-site and/or out-of-kind mitigation where equal or better biological functions and values are provided… Priority habitats, and habitats of priority species, may be replaced at a level greater than the impacts of the project on those habitats and species. The county follows this and also prefers mitigation occur within Benton County, but if circumstances preclude this from happening then the County will consider mitigation in adjacent County as acceptable.
229		15.02.210–.230 and 15.14.060		The Draft CAO does not address these comments [*See comments from Scott Downes – WDFW in this document*]. Further, the extensive language regarding mitigation banking given in Draft BCC 15.14.060(b) seems to further promote the idea that off-site mitigation is an acceptable substitute for the required mitigation sequence. This section should explicitly state that the mitigation sequencing described in BCC 15.02.210–.230 (and WDFW Policy M-5002) before resorting to a mitigation bank. Possible edit: (1) The County and cities in Benton County require mitigation to offset impacts from removal or degradation of shrubsteppe habitat when developed. If mitigation cannot be accomplished through mitigation sequencing as required by BCC 15.02.210–.230 and associated onsite actions then offsite, compensatory mitigation is required to achieve no net loss of function and values.	See response to comment #197
230		15.14.050		Fish and Wildlife Habitat Conservation Areas (Draft CAO§15.14.050) Regarding Draft CAO §15.14.040.c, WDFW Comments on Drafts notes: It should be clarified to ensure consistency with the County's general mitigation provisions in BCC 15.02.210–.230 and WDFW Policy M-5002. The general provisions correctly prioritize in-kind, on-15 WDFW. 1999. POL-M5002: Requiring or Recommending Mitigation (hereafter referred to as "WDFW Mitigation Policy") at §1. Attached to these comments as "WDFW-POL-M5002-Mitigation-Policy.pdf"site mitigation, whereas 15.14.040(C) could be interpreted as encouraging off-site mitigation for connectivity purposes without demonstrating that it provides greater biological function or value. WDFW recommends revising 15.14.040(C) to state that mitigation sites may be located off-site to support habitat connectivity only when it can be demonstrated that such siting achieves equal or greater ecological function, value, and long-term viability than on-site mitigation, consistent with Policy M-5002. Possible edit to current text: Mitigation and Contiguous Corridors. Impacts to Fish and Wildlife Habitat Conservation Areas shall be mitigated as specified in BCC 15.02.200 and 15.02.210. Mitigation sites shall be located to preserve or achieve contiguous wildlife habitat corridors in accordance with a mitigation plan that is part of an approved critical area report to minimize the isolating effects of development on habitat areas, Mitigation sites may be located off-site to support habitat connectivity only when it can be demonstrated that such siting	See response to comment #197

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				achieves greater ecological function, value, and long-term viability than on-site mitigation. so long as mitigation of aquatic habitat shall be located within the same aquatic ecosystem as the area disturbed. We're not sure if this captures the original intent of the code. We're guessing the intent was: "If you're going to mitigate on site, try to locate the mitigation so that it supports habitat corridors". Because if you're mitigating off-site, then you could instead restore core habitat. But in all cases, the code should prefer on-site to off-site and require ecological lift.	
231		15.14.020		Habitats and Species of Local Importance Draft CAO section 15.14.020 doesn't provide a mechanism for nomination of habitats and species of local importance (HSLI). As written, the planning director has sole discretion on whether to present recommendations regarding HSLI. Please consider the following edits[16] : a) Any person may nominate for designation, or propose de-designation, of a species or habitat of local importance Nominated habitats or species must meet the definition in section 15.02.070. Proposals for de-designation of a species or habitat of local importance shall follow the same process as a nomination for designation, except that the proponent shall demonstrate that all designation criteria in subsection (b) no longer apply, such as due to federal or state de-listing of protected species, recovery has been achieved, or other facts that support that the species is no longer vulnerable or is protected through other means. (b) Nominations for habitats or species of local importance shall include the following: (c) Proposals Nominations shall be reviewed by the County and may be forwarded to the State Departments of Fish and Wildlife, Natural Resources, and/or other local, state, federal, and/or tribal agencies, or experts for comments and recommendations. The Draft CAO seems to give the Planning Administrator veto power over HSLI recommendations, rather than just making a recommendation to the Planning commission. Please clarify that the planning director only makes a recommendation by altering text for 15.14.020.e: (e) The Planning Commission shall hold a public hearing for nominations upon receiving the Planning Administrator's recommendation. After the hearing the planning Commission shall make a recommendation to the Board of Commissioners to approve or deny the recommendation based on the standards enumerated in subsection b. 16 Based on CAO for Island County, WA 17.02B.220. https://library.municode.com/wa/island_county/codes/code_of_ordinances?nodeId=TITXVIIZO_CH17.02BISCOCRARRE_GEPR_17.02B.070RERE	Thank you for this comment. Update Chapter 15.14.020(e) text to read as suggested. While no additions are being made to this text, citizens are welcome to reach out to the Planning Administrator to provide information on habitats and even encourage a local importance designation. Opportunity is also provided at Planning Commission meetings to make similar suggestions.
232	Patrick Paulson Laurie Ness July 2,2026	15.14.010.a		Designate RMZ as FWHCA As recommended by WDFW17 and discussed in our comments at §4.1, add RMZ as a designated FWHCA in Draft CAO §15.14.010.a.	Update as suggested
233		15.14.050 (g.4.i)		RMZ width of at least 100' not clearly enforced In areas of steep slopes, Draft CAO §15.14.050 (g.4.i) could be read as stating that the RMZ extends only to a "geologically safe distance away from the steep slope" even if that distance is less that the width specified in (g.2). Here's a clumsy attempt at rectifying the problem: … the case where waterbody is adjacent to a steep slope or bluff (slope greater than 15 percent), the RMZ specified in item (2) of this section (g) is increased to would extend to a geologically safe distance away from the edge of the steep slope or bluff…	See response to comment 194

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234		15.14.050 (g.4.i)		Draft CAO §15.14.050 (g.4.i) contains no provision for determining the RMZ from the outer edge of a channel migration zone and should be updated: (i) RMZs for rivers, lakes, ponds, and streams shall be measured in all directions from either the ordinary high-water mark (OHWM) as identified in the field; or the outer edge of the channel migration zone (if one exists and the outer edge is farther from the middle of the watercourse than the OHWM). In the case where waterbody is adjacent to a steep slope or bluff (slope greater than 15 percent), the RMZ specified in item (2) of this section (g) is increased to would extend to a geologically safe distance away from the edge of the steep slope or bluff to prevent erosion or sloughing, as determined by a qualified professional (licensed geologist or geotechnical engineer)	See response to comment 194
235		15.14.050		A regulation like the following[19] should be added: The director shall have the authority to increase the width of a RMZ on a case-by-case basis when such an increase is necessary to achieve any of the following: A. Protect fish and wildlife habitat, maintain water quality, ensure adequate flow conveyance; provide adequate recruitment for large woody debris, maintain adequate stream temperatures, or maintain or improve existing in-stream conditions. B. Compensate for degraded vegetation communities or steep slopes adjacent to the stream. C. Maintain areas for channel migration. D. Provide adequate pollution filtration functions. E. Protect adjacent or downstream areas from erosion, landslides, or other hazards. 19 Adapted from Walla Walla County's CAO (https://library.municode.com/wa/walla_walla_county/codes/code_of_ordinances?nodeId=TIT18EN_ CH18.08CRARPR_18.08.674FIWIHACOARATBOUFIN	Update as suggested with the following modification to the introductory sentence: The director shall have the authority to increase the width of a RMZ on a case-by-case basis when such an increase is necessary to achieve any of the following, as documented through a Critical Areas report or through technical review comments by a state or federal agency responsible for fish and wildlife species and habitat, and supported by best available science:
236	Patrick Paulson Laurie Ness July 2,2026	15.14.050 (g)		Riparian Management Zones should be subject to requirements for mitigations WDFW Comments on Drafts states: … any portion of an RMZ used to offset a buffer reduction shall be considered compensatory mitigation and therefore: Must be treated as part of the project's mitigation plan, subject to the same monitoring and performance standards as other mitigation areas. The following text can be added to 15.14.050.g: RMZs shall be included in the project's mitigation plan (15.02.230) and are subject to the same monitoring and performance standards as other mitigation areas.	Update as suggested
237		15.14.050 (g)		Missing citation to 'local studies' BCC 15.14.050 (g) states: (1) … Required RMZs … shall be consistent with the management recommendations issued by the Washington State Department of Fish and Wildlife and local conditions as documented through site-specific or river/ stream area specific conditions as established through local studies that meet BAS criteria.	Specific citation is not required here as this is just referring to general types of studies that could be utilized to supplement state guidance. Please see BAS sources document citation: AC Geospatial, 2020. Riparian Buffer Analysis Summary Memorandum. Prepared for Benton County, May 2020, for an example of a document that characterizes existing riparian conditions for certain streams

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				(2) Rivers, Lakes, Ponds, and Streams. Waterbodies classified by the water typing system specified in WAC 222-16-030 have the following RMZs consistent with State Department of Fish and Wildlife recommendations and local studies characterizing existing conditions [emphasis added] No citation is given for either 'local studies that meet BAS criteria' or 'local studies existing conditions'; these local studies cannot be evaluated to determine whether they meet the standard for Best Available Science because they are not in the record.	in Benton County as an example of the type of study generally described. Update to read: (1) … Required RMZs … shall be consistent with the management recommendations issued by the Washington State Department of Fish and Wildlife and local conditions as documented through site-specific or river/ stream area specific conditions as established through local studies that ~~meet BAS criteria~~ characterize existing conditions, as applicable.
238		15.14.050		RMZ requirements wording The wording of paragraphs (1) and (2) are confusing. Paragraph 1, for example, states "Required RMZs … shall be consistent with the management recommendations issued by the Washington State Department of Fish and Wildlife and…" as if this section is describing RMZ requirements somewhere else. Here's some edits. (g) Riparian Management Zones (RMZs). (1) Establishment of RMZs. RMZs protect habitat conservation areas are as set forth in this section (g). Buffers RMZs shall consist of an undisturbed area of native vegetation or areas identified for restoration established to protect the integrity, all key riparian functions, and values of the affected habitat. Required RMZs requirements reflect the sensitivity of the habitat and the type and intensity of human activity proposed to be conducted nearby and shall are designed to [see note 1 below] be consistent with the management recommendations issued by the Washington State Department of Fish and Wildlife and with local conditions as documented through site-specific or river/stream area specific conditions as established through local studies that meet BAS criteria. (2) Rivers, Lakes, Ponds, and Streams. Waterbodies classified by the water typing system specified in WAC 222-16-030 have the following RMZs consistent with State Department of Fish and Wildlife recommendations and local studies characterizing existing conditions [see Note 2 below]:… The purpose of these corrections is to make the regulation clearer: 1. We require no net-loss to all ecological function the word 'key' is subjective and superfluous. 2. The text is talking about the current regulation – not setting out requirements for another set of regulations. "are designed to be" is a wordy but is clearer than current "shall be". 3. We've already established in (1) how the RMZ requirement was established	Update this section to read: RMZs protect <u>riparian</u> habitat functions <u>and values</u> ~~conservation areas are as set forth in this section (g). Buffers~~ RMZs ~~include shall~~ often consist of an undisturbed area of native vegetation or areas identified for restoration established to protect the integrity, all key riparian functions, and values of the affected habitat. Required RMZs requirements reflect the sensitivity of the habitat and the type and intensity of human activity proposed to be conducted nearby and shall ~~are designed to [see note 1 below~~] be <u>protected</u> consistent with the management recommendations issued by the Washington State Department of Fish and Wildlife and documented ~~with~~ local conditions in critical area reports or other ~~as documented through site-specific or river/stream area specific conditions as established through~~ local studies, <u>as applicable</u> ~~that meet BAS criteria~~. (2) Rivers, Lakes, Ponds, and Streams. Waterbodies classified by the water typing system specified in WAC 222-16-030 have the following RMZs consistent with State Department of Fish and Wildlife

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					recommendations and local studies characterizing existing conditions
239	Patrick Paulson Laurie Ness July 2,2026	15.02.070 (60) 15.14.040.g.2		Conflicting definitions of RMZ BCC 15.02.070 (60) defines RMZ as: Riparian management zone (RMZ)-The RMZ is the area that has the potential to provide full riparian functions. In forested areas, including deciduous trees as is common in the lower Yakima and along the Columbia River, this can occur within one 200-year site-potential tree height measured from the edge of a stream channel. In situations where a channel migration zone (CMZ) is present, this occurs within one site potential tree height measured from the edges of the CMZ. In non-forest zones the RMZ is defined by the greater of the outermost point of the riparian vegetative community or the pollution removal function, at 100-feet. But BCC 15.14.040.g.2 defines RMZ differently: Rivers, Lakes, Ponds, and Streams. Waterbodies classified by the water typing system specified in WAC 222-16-030 have the following minimum riparian buffer requirements RMZs consistent with State Department of Fish and Wildlife recommendations and local studies characterizing existing conditions: (i) Type S (Shorelines of the State) RMZ: Type S water RMZs and associated Channel Migration Zones are protected by the Benton County Shoreline Master Program, as existing and hereafter amended, rather than this chapter. (ii) Type F (Fish), Type Np (Non-Fish Perennial) and type Ns (Non-Fish Seasonal) RMZ: One hundred (100) feet The first definition states that the RMZ within forested areas is within one 200-year site-potential tree height (SPTH200) measured from the edge of a stream channel and is the current BAS from WDFW. The second definition is not BAS and makes no mention of 'forested areas' and sets the RMZ width as 100 feet. No allowance is given for "one 200-year site-potential tree height measure from the edge of a stream", as specified in the definition of RMZ in BCC 15.02.080 (g). The Draft CAO departs from BAS by not requiring an RMZ width equivalent to the 200-year site potential tree height, as recommended in Riparian Recommendations. The County seems to justify ignoring $SPTH_{200}$ when determining RMZ conclusions Riparian of two documents–Riparian Buffer Summary20 and Proposed Riparian Buffers21– listed in the County's list of sources of BAS22, but ignores clear guidance from Riparian Recommendations[23]: …designating a riparian area based on at least one SPTH200 is a scientifically supported approach if the goal is to protect and maintain full function of the riparian ecosystem for aquatic habitat and species, including salmon. In Futurewise et al. v. Snohomish Cty[24], the Growth Management Hearings Board (GMHB) noted that the Washington Court of Appeals held that"… evidence of the best available science must be included in the record and must be considered substantively in the development of critical areas policies and regulations". While the County's documents argue that RMZ width based on $SPTH_{200}$ will be narrower than the minimum 100-foot width specified in Draft CAO for most riparian areas in the County, they give no reasoned justification for not using $SPTH_{200}$ to determine RMZ width where $SPTH_{200}$ exceeds 100 feet. In Futurewise et al. v. Snohomish Cty, the GMHB ruled: The Board has long held and the Supreme Court has agreed that a "[c]ounty cannot choose its own science over all other science and cannot use outdated science to support its choice."[[25]	SPTH200 cannot be consistently applied in Benton County because the underlying NRCS soil data do not provide the forest productivity information needed to calculate it. Not all NRCS soil polygons are forested or contain forest productivity attributes, and WDFW's *Riparian Ecosystems, Volume 2: Management Recommendations* specifically states that NRCS soil polygons in Benton, Franklin, Grant, and Adams counties lacked the forest productivity information used to generate SPTH200-based RMZ widths. Accordingly, these areas were not assigned SPTH200 values and were instead classified as either "dryland ecosystems" or "other lands" (Volume 2, p. 71). Thus, the reasoned justification for not using SPTH200 where it exceeds 100 feet is that no scientifically supported SPTH200 values are currently available for Benton County, including any values demonstrating SPTH200 greater than 100 feet. This conclusion is also consistent with WDFW's mapped *2025 Riparian Management Zones Map*, which provides estimated locations for RMZs statewide. WDFW's RMZ data is based on estimated stream locations, likely tree species, soils, and maximum tree height at 200 years. Where estimated tree height is less than 100 feet, WDFW applies a minimum 100-foot RMZ to account for pollution-removal functions. WDFW's statewide map does not establish any SPTH200 values greater than 100 feet for Benton County or provide a basis for replacing the County's 100-foot RMZ standard. Citations Washington Department of Fish and Wildlife. *Riparian Ecosystems, Volume 2: Management Recommendations*. Technical editors Amy Windrope, Terra Rentz, Keith Folkerts, and Jeff Azerrad. Olympia, WA: Washington Department of Fish and Wildlife, December 2020, pp. 27, 71

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				20 AC Geospatial. 2020. Riparian Buffer Analysis Summary Memorandum (Riparian Buffer Summary). Prepared for Benton County, May 2020 21 Anchor QEA. 2021. Proposed Riparian Buffers within the Benton County Critical Areas Code Update (Proposed Riparian Buffers). Prepared for Benton County, January 30,2021. Attached to these comments as 'Anchor-QEA-2021.pdf'. 22 Benton County. 2026. Draft of APPENDIX A—GENERAL REFERENCES AND BEST AVAILABLE SCIENCE (BAS List), attached to these comments as 'BAS Sources Trk Chgs BCC 15.02 - 15.14.pdf. Obtained June 18, 2026, via email from the Count. Email attached to these comments as 'RE_ [EXTERNAL] BAS for CAO?.eml' PDF attached as 'RE_ [EXTERNAL] BAS for CAO?.pdf' .' 23 P. 17. 24 Futurewise, Pilchuck Audubon Soc'y, Adopt A Stream Found., League of Women Voters of Snohomish Cnty. and Sno-Isle Sierra Club v. Snohomish Cnty (Futurewise et al. v. Snohomish Cnty), GMHB Case No. 25-3-0011, Final Decision and Order (Feb. 17, 2026). 25 P. 23, citing Honesty in Envtl. Analysis and Legis. (HEAL) v. Growth Mgmt. Hearings Bd., 96 Wn. App. 522, no reasoned justification for not using SPTH200 to determine RMZ width where SPTH200 exceeds 100 feet.	Keith Folkerts, Ken Muir, and Julia Michalak, *2025 Riparian Management Zones Map: A User Guide for Local Governments from WDFW's Priority Habitats and Species Program* (Olympia: Washington Department of Fish and Wildlife, Habitat Program, 2025), https://wdfw.wa.gov/publications/02671. To further evaluate whether tree height data could provide a meaningful basis for establishing RMZ widths in Benton County, the County reviewed landcover and tree canopy data from WDFW's Riparian Data Engine and Landcover datasets within WDFW-mapped RMZs along natural streams (manmade watercourses were excluded). The tree-canopy data are derived from the latest available version of WDFW's Land Cover dataset, which maps landcover types and the extent and height of tree canopy throughout Benton County. The analysis included Corral Creek, Glade Creek, East Branch Glade Creek, Rattlesnake Creek, Sulphur Creek, Spring Creek, Snipes Creek, the Yakima River, and the Columbia River. Only 10.5 percent of the land cover within the reviewed RMZs was classified as tree cover. The remaining land cover consisted of 70.5 percent herbaceous vegetation, 11.0 percent shrub cover, 7.3 percent non-vegetated land, and 0.7 percent water. Most tree cover occurred along the Columbia and Yakima rivers, which are regulated under the County's Shoreline Master Program. Within areas with trees, the average tree height was 25.6 feet and the 90th-percentile tree height was 41.8 feet (using an area-weighted average value). These results demonstrate tree height—whether expressed as potential tree height or actual existing canopy height—are neither consistently available nor representative of

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					riparian conditions in Benton County to serve as a practical basis for determining RMZ width. Citations: Washington Department of Fish and Wildlife, "Land Cover," *High Resolution Change Detection*, accessed July 24, 2026, https://hrcd-wdfw.hub.arcgis.com/pages/land-cover. In 2020, AC Geo evaluated the riparian vegetation communities along the non-shoreline jurisdiction streams in Benton County (those streams regulated outside of Shoreline Jurisdiction but within this critical area code) and found in cases the riparian vegetation width to be well within 100-feet on each side. Per WDFW BAS guidance, when this condition exists, then you go with the greater of two measurements, which is the 100-feet for pollutant removal. For dryland ecoregions, *Riparian Ecosystems, Volume 2: Management Recommendations* recommends protecting the full extent of the riparian vegetative community. Where neither SPTH200 nor the riparian vegetative community extends at least 100 feet, WDFW recommends establishing a minimum 100-foot RMZ to provide pollution-removal functions (Volume 2, p. 27). Because scientifically supported SPTH200 values are unavailable for Benton County and the locally evaluated riparian vegetative communities generally do not extend beyond 100 feet, the County's 100-foot RMZ for Type F, Np, and Ns waters is consistent with the applicable recommendations in Volume 2. The County has therefore substantively considered WDFW's statewide best available science, evaluated the availability and applicability of SPTH200 and existing tree-height data, reviewed local riparian vegetation conditions, and adopted an RMZ standard

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					consistent with WDFW's recommendations for dryland ecosystems. The County is not disregarding SPTH200 or substituting unsupported local science. Rather, it is applying the portions of WDFW's recommended methodology that are supported by the available statewide and local data for Benton County. See also Comment 131 by WDFW, and our response. What is cited as the second definition is not in fact a definition but rather a description of a framework for applying RMZs based on waterbody type, and really only distinguishes between RMZs in shoreline jurisdiction (Yakima and Columbia River – applied per SMP) and all other streams – 100 feet, as further described above.
240	Patrick Paulson Laurie Ness July 2,2026	15.14.040.g.1		Draft CAO falsely claims the RMZ definition is consistent with WDFW BAS recommendations BCC 15.14.040.g.1 states that Required RMZs reflect the sensitivity of the habitat and the type and intensity of human activity proposed to be conducted nearby and shall be consistent with the management recommendations issued by the Washington State Department of Fish and Wildlife and local conditions as documented through site-specific or river/ stream area specific conditions as established through local studies that meet BAS criteria [Emphasis added]. The RMZ definition in BCC 15.14.040.g.2 is not consistent with WDFW recommendations, since no consideration is given to the 200-year site potential tree height. Further, no references are given to any 'local studies that meet BAS criteria' that support departing from WDFW recommendations. As citizens, we should not have the burden of reading all the documents listed by the county as BAS to ferret out how the County justifies departing from BAS provided by WDFW. Further WDFW Management recommendations specifically state (p. 26, Riparian Recommendations): In dryland ecoregions, it is less common, but still possible to find riparian vegetation which includes—and may even be dominated by—large trees. Examples of large tree species in these areas are black cottonwood (Populus trichocarpa) and ponderosa pine (Pinus ponderosa). If SPTH200 in dryland ecoregions exceeds 100 feet, then it should be used for the RMZ width [emphasis added].	See response to Comment #239

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241		15.14.040 (g) (3)		RMZ Averaging WDFW commented[27]: 15.14.040 (g) (3). The RMZ averaging provision allows narrower buffers in one location to be offset by wider buffers elsewhere; however, it does not specify how the wider portions will be protected or managed over time. To ensure the ecological benefit of averaging is maintained, WDFW recommends clarifying that any portion of an RMZ used to offset a buffer reduction shall be considered compensatory mitigation and therefore: 1. Must be protected in perpetuity (or for the life of the project, at minimum) through a recorded conservation easement, deed restriction, or other legally binding instrument. 2. Must be maintained in an undisturbed, vegetated state consistent with its intended ecological function; and 3. Must be treated as part of the project's mitigation plan, subject to the same monitoring and performance standards as other mitigation areas. The Draft CAO does not address these comments. As noted by WDFW, mitigation for impacts to the RMZ must be viewed as compensatory mitigation, since the mitigation occurs outside of the RMZ, which is designated as a Fish and Wildlife Habitat Conservation Area[28]. Compensatory mitigation must be provided in ratios larger than 1:1[29], but RMZ averaging only requires a 1:1 ratio.[30] Further, the provision for RMZ averaging is inoperable, since it requires a qualified professional to demonstrate that reduction of the RMZ width will not "reduce riparian functions or functional performance"[31]. But since RMZ is defined as "the area that has the potential to provide full riparian functions", and because the Draft CAO states "…Required RMZs reflect the sensitivity of the habitat"[32] there is no avenue to demonstrate that reduction will not reduce riparian function. Finally, the RMZ averaging provision allows the RMZ width to be reduced by "twenty five percent of the standard width or fifteen (15) feet, whichever is less"[33]. However, the County provides no science that shows this reduction can be made without reducing riparian function. §15.14.010.a.2), and RMZs are defined as "the area that has the potential to provide full riparian functions." (Draft CAO §15.02.070.60). 26 The Board cites Island Cty. Citizens' Growth Mgmt. Coal. v. Island Cty., WWGMHB Case No. 98-2-0023c, Compliance Order (Mar. 6, 2000) at 11 (cited with approval in Ferry Cty. v. Concerned Friends of Ferry Cty., 155 Wn.2d 824, 837 838, 123 P.3d 102 (2005)) 27 WDFW Comments on Drafts pp. 2-3. 28 Because riparian areas are PHS (Washington Department of Fish and Wildlife. 2008. Priority Habitat and Species List. Olympia, Washington, pp. 265-66), PHS is designated as FWHCA (Draft CAO 29 "Compensatory mitigation ratios must be greater than 1:1 to address temporal losses, functional uncertainty, and performance risk." Draft CAO §15.02.210.c. 30 "The total area contained in the buffer RMZ area after averaging is no less than that which would be contained within the standard buffer RMZ under subsection (g)(2) above;…". Draft CAO §15.14.050.g.3.iii. 31 Draft CAO §15.14.050.g.3.i 32 Draft CAO §15.14.050.g.1 33 Draft CAO §15.14.050.g.3.iv	Buffer averaging does not automatically trigger a mitigation plan but the County does support adding this suggested language in 15.14.040 to ensure ecological benefit of averaging is maintained: 1. Must be protected in perpetuity (or for the life of the project, at minimum) through a recorded conservation easement, deed restriction, or other legally binding instrument. 2. Must be maintained in an undisturbed, vegetated state consistent with its intended ecological function Based on this, the RMZ buffer averaging is not a compensatory mitigation action but rather a slightly different RMZ boundary than a straight application of the 100 foot boundary following OHWM but still achieving no net loss of ecological function. Also, as discussed in Comment #239 response, riparian vegetation for streams in Benton County outside of wetlands are always less than 100 feet, which means there could exist other vegetation, including native and non-native plants of varying habitat value including completely disturbed areas from historical land use. The qualified professional preparing the Critical Areas report would be required to document these conditions and demonstrate no net loss of ecological function would still be achieved through averaging.
Title 17					

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242	WA State Dept of Commerce Chaz Bates August 12, 2026	17.10		Chapter 17.10 BCC Permit Process Procedures. The chapter and proposed amendments appear to be consistent with recent changes to chapter 36.70B RCW. In the 2026 legislative session, a change was made by Engrossed Second Substitute House Bill 2418 and became effective June 11, 2026. We are working on a fact sheet on ESSHB 2418 and hope to have it available soon. In the meantime, you can review ESSHB 2418. At a high level the bill affects when applications are forwarded to public utility or special purpose districts, and requirements for designating a single point of contact for each project permit.	Thank you for this feedback; we look forward to receiving the ESSHB 2418 fact sheet when it becomes available.
Flood Damage and Prevention Code					
243		Chapter 3.26.040, Definitions		Flood Damage And Prevention (Chapter 3.26) Please add the following definition (from Draft CAO definitions) to definitions for this section, since many critical areas such as wetlands and fish and wildlife habitat conservation areas are in flood plains: Repair or maintenance-An activity that restores the character, scope, size, and design of a serviceable area, structure, or land use to its previously authorized and undamaged condition. Activities that change the character, size, or scope of a project beyond the original design and drain, dredge, fill, flood, or otherwise alter critical areas are not included in this definition.	Repair or maintenance in the context of this code is referring to buildings and other structures. The CAO serves as an overlay to this code, and so all the CAO provisions would apply, making it unnecessary to add in this definition.
Shrubsteppe Mitigation					
244	WDFW– Scott Downes – 10/16/25	Shrubsteppe Mitigation Program	1	Recommend using the WDFW PHS definition. That definition includes disturbance, which is lacking below. Definition is at: https://wdfw.wa.gov/publications/00165 under shrubsteppe	This was updated in the draft CA code as suggested.
245		Steep slope areas are not primary habitat	2	We recommend careful discussions about using steep slope habitats for mitigation areas as they may not mitigate for the same impacts.	Agree and we will keep this in mind, noting there may be a mix of slopes on a mitigation property and assume WDFW would be okay with some steeper slope areas that might exist along with less elevated areas.
246		Other: habitat outside of the above designations	4	should be recognized that the human footprint layer played heavily into this layer. There are areas of high quality shrubsteppe, but if adjacent to developed areas they were put into the "other" category and some of these are only developed on one side, so they have connections to more intact landscapes.	Thank you for this context.
247		Mitigation properties spatial priority and quality metrics	9	In addition to WSRRI, we would recommend that some of the wildlife connectivity layers be used to incorporate connectivity. Those can be found in PHS and the recently completed WAHCAP report. https://wdfw.wa.gov/species-habitats/habitat-recovery/connectivity/action-plan	WAHCAP was used in both identifying shrubsteppe spatial priorities and potential mitigation properties.
248		Figure 4 description	11	Recommend not focusing too heavily on species presence surveys. Some species are seasonally dependent and can be cryptic. A one or two day generalized site visit often will not accurately show the species use of an area	Noted
249		Figure 5 – process diagram	12	Recommend producing a document that outlines the members of the Bank Advisory Board and their roles and responsibilities.	The updated process including RACI better defines roles and responsibilities. We no longer include an advisory board in the draft program description. This has been replaced with stakeholder coordination, including WDFW in mitigation property identification and baseline

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					conditions reporting and in determining restoration strategy and mitigation credits provided, among other things.
250		Table 7	14	These ratios are lower than ratios used in WDFW mitigation bank guidance, see copy attached to email sent. WDFW recommends revisiting these ratios in early 2026 after we have a draft of our updated shrubsteppe management recommendation which will include updated recommended ratios. These don't seem to account for quality differences in the "Other" habitat highlighted in an earlier comment. Recommend building in some difference to reflect quality differences in "other" habitat.	Ratios continue to be refined with input from WDFW.
251		Last paragraph accounting for restoration	14	We recommend that restoration opportunities be built into any mitigation opportunity to truly achieve no net loss of impacts per GMA. While some properties are of such a high quality that restoration opportunities may be limited, we recommend that the project be expanded into adjacent areas that may need restoration. This is akin to the concept of Growth Opportunity Areas under the "Build the Core" concept in WSSRI.	Shrubsteppe restoration is a component of every mitigation action and mitigation property to be included in the program.
252		First paragraph	15	We recommend increasing this multiplier to incentivize restoration. Restoration is key to achieving no net loss of impacts and we are concerned that with significant resources needed to restore an area and only gaining a small bump in credits that there will not be much appetite for restoration.	Shrubsteppe restoration is a component of every mitigation action and mitigation property to be included in the program.
253		Credit release staging section		Need to have discussions on metrics for restoration and at what scale do we consider restoration successful and what practices would be considered under restoration. would mitigation lands be purchased or only a conservation easement (CE) be placed? If only a CE be placed, then details needed on who is monitoring the CE and ensuring that terms of the CE are habitat based are important (i.e. management activities)	Shrubsteppe restoration is a component of every mitigation action and mitigation property to be included in the program. Additionally, expanded roles and responsibilities address who will conduct these responsibilities.
254		Mitigation landholder roles paragraph	16	Purchase of the property also needs a CE to be placed on the property to ensure long-term protection. We recommend that any property targeted for mitigation be first placed into permanent protection and then looking for opportunities to restore/rehabilitate the land.	Agree; this is built into the program.
255		Top of page	17	Please confirm this means the level 2 assessment under EIA?	Yes, however EIA is just one way to baseline mitigation property conditions, as discussed with WDFW.
256	WDFW Scott Downes 4/17/2026			WDFW provided various edits to the draft shrubsteppe mitigation program description	Updated as suggested, and changes will be reflected in the revised draft made available in late July or early Aug 2026
257	Scott Downes – 4/20/26			WDFW had several comments regarding the RACI chart related to WDFW's roles and responsibilities.	Updated as suggested, and changes will be reflected in the revised draft made available in late July or early Aug 2026
258	WDFW – Danny Didriksen – 5/11/26			**Benton County Shrubsteppe Mitigation Program Description** We appreciate that under the Section on Rationale for Mitigation Ratios, the program has prioritized a combination of protection of high-quality habitat and restoration of lower quality habitat. WDFW guidance is that preservation alone will not achieve the no net loss objective	Shrubsteppe restoration is a component of every mitigation action and mitigation property to be included in the program.

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				stated in the program, but the combination of protection and restoration is important to achieve shrubsteppe protection and ultimately enhancement of shrubsteppe functions. Tables referenced under the Section Calculating Impacts and Mitigation Credits should be viewed as interim and should be revisited once we update our PHS shrubsteppe management recommendations in relation to mitigation guidance (in progress). In the interim, we recommend you refer to our Grant County shrubsteppe mitigation bank technical memo. We recommend including an adaptive management framework within the mitigation program. The mitigation team can evaluate areas where the program is working well and areas where the program needs improvement to meet program objectives. This process can also incorporate relevant new guidance that comes out including but not limited to the forthcoming WDFW PHS shrubsteppe management recommendation update. We recommend program evaluation within the mitigation team on at least an annual basis. The shrubsteppe definition under the program purpose and need cites a definition from the WDFW shrubsteppe outreach flier. Instead, we recommend citing the Priority Habitats and Species (PHS) shrubsteppe definition found at: Priority Habitats and Species List | Washington Department of Fish & Wildlife Several methods are listed under the section Translating Spatial and Habitat Quality Ratings into Impact and Mitigation Credits. WDFW PHS shrubsteppe management recommendations currently contains a methodology for assessing impacts, and the methodology is being revised as part of the management recommendations update currently in progress. Please include WDFW PHS shrubsteppe recommendations in the list of methods for determining a site's function score and that the Critical Areas Report (CAR) should follow the PHS recommendations. The suggested range of mitigation ratios under the Section Calculating Impacts and Mitigation Credits refers to the WDFW solar and wind guidance. The solar and wind guidance is not specific to shrubsteppe and suggest removing it as a reference in the document. We recommend adding in a reference to the PHS shrubsteppe recommendations. The WDFW solar and wind guidance is referenced under the section Rationale for Mitigation Ratios. This particular reference should be removed as the solar and wind guidance is not shrubsteppe specific. Please insert an intention to revisit and adaptively manage the mitigation program when the revised PHS shrubsteppe management recommendations are published.	Tables can be revisited once WDFW management recommendations are available. Adaptive management has been added as a program component Update as suggested Program description can be updated once WDFW management recommendations are available. Update as suggested; see response above on adaptive management
259				**Benton County Shrubsteppe Mitigation RACI Chart** There are several instances under WDFW roles and responsibilities that we recommend changing in the RACI chart to reflect our current roles and responsibilities. • Under Technical Analysis and Mapping it lists WDFW as "Consulted" under Maintain WSRRI spatial priority data and maps. Please change to "Responsible" as WDFW is responsible for maintaining WSRRI spatial priority data and maps. • Under Technical Analysis and Mapping it lists WDFW as "Consulted" under Maintain PHS shrubsteppe dataset. Please change to "Responsible" as WDFW is responsible for maintaining PHS shrubsteppe dataset.	RACI chart – update as suggested

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				• Under Permitting and Impact Assessment it lists WDFW as "Informed" under Verify habitat quality and WSRRI spatial ratings in the field. Please change to "Consulted" as WDFW typically reviews the habitat assessments and provides technical recommendations to the local jurisdiction. • Under Mitigation Property Acquisition it lists WDFW as "Consulted" under draft and execute mitigation banking instrument. We also recommend being consulted on the terms of the Conservation Easement (CE) or purchase to ensure that land management activities allowed on the property are consistent with habitat protection and restoration. WDFW Technical Comments **Comment 1: Program Description Should Meet Minimum Standards of a Formal Mitigation Banking Instrument** Description The Benton County Shrubsteppe Mitigation Program Description performs the functional equivalent of a mitigation banking instrument (MBI). It establishes credit generation methodology, debit calculations, a credit release schedule, and program governance. That approach is reasonable and not without precedent. However, because it is structured as a program description rather than a formal MBI, it lacks the procedural and technical completeness that a formal instrument would require. Washington's mitigation banking rules (WAC 173-700) establish a comprehensive framework covering certification, bank establishment, bank operation, credit use, compliance, and long-term management. The current draft addresses some elements of bank establishment but leaves significant gaps across the broader framework. Several of those gaps were discussed verbally during our meetings, and some are addressed in the April 20, 2026, RACI chart. However, verbal agreement and supporting working documents are not substitutes for documented, enforceable requirements written into the program instrument itself. The following elements should be addressed in the program description: **Bank Establishment (WAC 173-700-300 through 173-700-354):** • Service area description and rationale (WAC 173-700-301 and 173-700-302) • Financial viability (WAC 173-700-350) • Financial assurances (WAC 173-700-351) • Financial assurances for construction (WAC 173-700-352) o See Comment 4 for WDFW's recommended approach. • Financial assurances for monitoring and maintenance (WAC 173-700-353) o See Comment 6 for WDFW's recommended approach. • Financial assurances for long-term management (WAC 173-700-354) o See Comment 6 for WDFW's recommended approach. **Bank Operation (WAC 173-700-400 through 173-700-421):** • Monitoring plan (WAC 173-700-400 through 173-700-402) • Adaptive management plan (WAC 173-700-403) • Random audits (WAC 173-700-413)	There is not a specific rule for addressing shrubsteppe mitigation; the County will rely on its adopted program description and governance program, along with those agreements implemented under the program to provide the procedural and technical detail for the program. We have reviewed the suggestions provided below and believe that the County program incorporates many of these provisions already or will establish them through subsequent provisions and implementing agreements.

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				• Long-term management plan (WAC 173-700-420) **Compliance and Enforcement (WAC 173-700-600 through 173-700-603)** The program would benefit from an added compliance and enforcement framework, including provisions for remedial action, credit suspension, and program termination. Relatedly, clarifying certifying authority would strengthen the program's foundation. For wetland mitigation banks, Ecology holds that role by rule; for terrestrial and shrubsteppe banks, no equivalent is currently defined in Washington rule. Benton County is a logical candidate given its GMA obligations and permitting role and explicitly stating that authority in the program instrument would provide important clarity. Identifying who has standing to require corrective action will help ensure the program can be implemented and overseen effectively. WDFW Recommendation We recommend developing the program description into a full mitigation banking instrument consistent with WAC 173-700 or supplementing it to address the elements identified above. Technical corrections are an important part of that work but pairing them with a clear operational and legal foundation will produce a program that can be implemented, audited, and enforced with confidence. Resolving certifying authority early in that process will help clarify what compliance mechanisms are available and who is responsible for exercising them.	Benton County along with the cities that participate in the program are responsible for compliance and enforcement.
				Comment 2: Enhancement of High-Quality Shrubsteppe as a Mitigation Activity Description The current draft allows enhancement of already high-quality shrubsteppe to generate mitigation credits. We have three concerns with this approach First, neither the Ecological Integrity Assessment (EIA) nor the Bureau of Land Management's Assessment, Inventory, and Monitoring (BLM AIM) methods have been validated for detecting marginal improvements in sites already functioning near reference condition, so applying them to high-quality sites presupposes a level of sensitivity that has not been demonstrated. Second, the ecological return on investment for enhancing habitat at 90% of the Natural Range of Variability (NRV) is far lower than restoring degraded habitat. Directing mitigation dollars toward high-quality sites produces a fraction of the functional lift achievable through restoration, which works against the program's no net loss objective. Third, active intervention on late successional high-quality shrubsteppe can set back ecological development rather than improve it. The assumption that all shrubsteppe benefits from enhancement is not true in all cases. WDFW Recommendation Credits should only be generated for measurable, verifiable functional uplift above a documented baseline. We recommend the program explicitly limit crediting to sites below 90% NRV, with high-quality sites eligible for preservation credits only, consistent with the activity-specific ratio framework described in Comment 2.	Comment 2: We have shifted to a modified version of the activity-specific ratio framework described in WDFW's Comment 2, so that high-quality sites are generally only eligible for preservation credits only. This removes any reliance on EIA or BLM AIM to detect marginal improvement near reference condition. The proposed framework departs from WDFWs suggested framework in that it distinguishes between preservation only and preservation with enhancement. In many cases, even in high quality Shrubsteppe, limited, site specific enhancement activities may still enhance the long-term function of the Shrubsteppe habitat. Examples include addition of wildlife habitat structures, altered management practices, improved wildfire resilience, and targeted invasive species control. By incorporating the updated, activity-specific ratio framework, high-quality shrubsteppe sites would be limited to preservation or preservation with limited enhancement. This approach recognizes that the greatest

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				Comment 3: Credit Generation Formula Should Follow Survey-Delineated Activity Determination Description The current draft calculates bank credits using a pre/post restoration multiplier formula rather than a survey-delineated activity determination. The formula as written: (500 × 1x pre-restoration) + (500 × 0.5x post-restoration) = 750 credits is not traceable to any defined variable in the mitigation program and produces a credit total that cannot be independently verified. Under the framework we describe in Comment 5 below, credit generation follows a defined sequence: field surveys delineate the bank by current EIA/NRV condition, the condition determines the required mitigation activity, and the activity ratio is applied to acreage. For a 500 acre WSRRI Growth Opportunity Area (GOA) site in moderate condition, the correct formula is: 500 acres ÷ 3 (Rehabilitation ratio) × 3 (GOA spatial multiplier) = 500 credits The county's formula produces 750 credits for the same site, a 50% inflation with no described methodological basis. WDFW Recommendation Credit supply for any bank enrollment should be determined by field survey that delineates the bank into activity-specific units. Each unit's credit value is calculated as: Credits = Acres ÷ Activity Ratio × Spatial Multiplier Credits are then released according to the schedule proposed in Comment 4, described below. The complexity lives in the bank establishment process. The permit counter calculation should be simple, transparent, and auditable. **Comment 4: Credit Release Schedule Does Not Ensure Restoration Will Be Completed** **Description** The proposed schedule releases 50% of credits upon easement execution, before any restoration work has begun. This front-loads financial return in a way that may not provide sufficient incentive to ensure restoration is completed. A party could capture the majority of their return before any restoration activity occurs, and the program currently has no recovery mechanism if work stops at Stage 1. Washington's wetland mitigation banking rules (WAC 173-700-331 through 173-700-334) limit preconstruction releases to 14% of total credits and tie the bulk of credits to demonstrated performance. While those rules don't apply directly here, they reflect best available science and offer useful guidance. WDFW Recommendation We recommend restructuring the credit release ratio to better align financial incentives with restoration performance: **Stage - Credit Release Condition – Credits released** 1 - Conservation easement secured – 25% 2 - Activity-specific restoration implementation complete - 50%	functional lift is generally achieved through restoration of degraded shrubsteppe, while also recognizing that high-quality sites provide important mitigation value by maintaining existing ecological function, landscape connectivity, and habitat condition over time. The ecological value of shrubsteppe should not be evaluated only by its potential for immediate measurable improvement, but also by its long-term capacity to continue functioning in the future (resilience). Preservation of high-quality shrubsteppe protects that capacity in perpetuity, and the planned framework would set aside funds for long term stewardship and recovery in the event of habitat loss. This is seen as a long term functional uplift, particularly where sites contribute to larger habitat blocks, regional connectivity. As mentioned above, limited enhancement may still be appropriate on high quality sites where it supports long-term stewardship and resilience without causing unnecessary disturbance to habitat that is already functioning at or near reference condition. Credits are generated from preservation and additional credits are generated from the restoration efforts, based on the restoration plan. The preservation credits will be provided

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				3 - EIA/AIMs or equivalent assessment demonstrates attainment of target quality benchmark - 25% This retains a Stage 1 release to recognize the easement's permanent protections, while ensuring the majority of financial return is tied to work actually being completed in Stage 2 with functional gains in habitat quality reached in Stage 3. We also recommend requiring a long-term management endowment as a precondition of any credit release. See Comment 6 for details. **Comment 5: Decoupling Mitigation Activity, Habitat Quality, and Spatial Priority** Description The draft proposes replacing Tables 6a and 6b with a single combined realized ratio table that collapses habitat quality, spatial priority, and mitigation activity into one lookup value. This raises three concerns: it makes individual transaction ratios difficult to disaggregate and verify; it creates a double-counting problem, since quality is already expressed in the activity assignment and applying a separate quality multiplier inflates or deflates credit values without scientific justification; and it prevents accurate accounting for within-parcel habitat heterogeneity, where different sections may require different activities at different quality levels. Precise no net loss accounting is better served by evaluating each distinct area independently. WDFW Recommendation We recommend replacing the current combined table with the following decoupled three component framework. Proposed Replacement Framework Credit Generation Side Habitat quality is already accounted for in how the mitigation activity is assigned. The current condition of the mitigation site, expressed as a percentage of the NRV established from a reference site: **% of NRV - Mitigation Activity - Activity Ratio** ≥ 90% of NRV - Preservation 8:1 60–89% of NRV - Rehabilitation 3:1 < 60% of NRV - Reestablishment 2:1 The activity ratio is the quality adjustment. Applying a separate quality multiplier on top of the activity ratio double-counts the same variable. The credit formula is: Credits Generated = Acres ÷ Activity Ratio × Spatial Multiplier Spatial Priority (Mitigation Site) - Multiplier Core - 4x GOA - 3x Corridor - 2x Other - 1x Debit Side On the debit side, quality must be accounted for independently because the debit measures what is being lost, not what activity is being performed. The debit formula is:	first followed by restoration per a credit release schedule as provided in the restoration plan. The County has replaced the pre/post restoration multiplier with the survey-delineated activity determination WDFW recommends. Under the reworked framework, a field survey delineates each bank unit by current EIA/NRV condition, the condition determines the required mitigation activity, and credit is calculated as Acres ÷ Activity Factor × Spatial Priority Factor. The prior formula and its 750-credit result are removed. As noted above, credits are generated from preservation and additional credits are

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				Credits Required = Acres × Quality Multiplier × Spatial Multiplier **EIA Score – Quality - Multiplier** **A - High -1.0x** **B - Good - 0.75x** **C -Moderate - 0.50x** **D - Poor - 0.25x** **Spatial Priority (Impact Site) - Multiplier** **Core – 4x** **GOA – 3x** **Corridor – 2x** **Other – 1x** This structure keeps the permit counter calculation simple, transparent, and independently auditable, while ensuring the debit accurately reflects the ecological value of the habitat being lost. The complexity of the credit generation methodology should live in the bank establishment process, not at the permit counter. **Worked Examples** Example 1 • Debit 10 acres of "Good" quality (EIA Score B) "Corridor" habitat impacted • 10 × 0.75 (Good) × 2 (Corridor) = 15 credits required Example 2 • Credit 6 acres of "Poor" quality (< 60% NRV) "Core" habitat restored to "High" quality • 6 ÷ 2 (Reestablishment ratio) × 4 (Core) = 12 credits generated Example 3 • Full Transaction 10 acres of "Poor" quality "Other" habitat impacted • 10 × 0.25 (Poor) × 1 (Other) = 2.5 credits required • Offset by 2.5 acres of reestablished Core • 2.5 ÷ 2 × 4 = 5 credits generated • obligation satisfied, with 2.5 credits remaining available In the impact example provided in the draft program description, 100 acres of "Good" quality "Other" habitat × 1.5x = 150 debits, illustrates this problem directly. Under the decoupled framework above, the correct calculation is 100 × 0.75 (Good) × 1 (Other) = 75 credits required. The combined lookup table produces a result twice as large, with no described methodological basis for the difference. **Comment 6: Long-Term Stewardship Funding Must Be Required and Tied to Credit Release** Description	generated from the restoration efforts, based on the restoration plan. The preservation credits will be provided first followed by restoration per a credit release schedule as provided in the restoration plan. The County has developed a decoupled three-component framework as suggested. Quality is accounted for only on the debit (impact) side; the credit (mitigation) side is set by the restoration activity and spatial priority, with no separate quality multiplier. This resolves the double-counting concern, keeps individual transaction ratios verifiable, and allows evaluation of within-parcel diffferences. The formulas match WDFW's: • Credits Generated = Acres ÷ Activity Factor × Spatial Priority Factor • Credits Required = Acres × Quality Factor × Spatial Priority Factor Spatial Priority Factors are identical for both impacts and mitigation and match WDFW: **Core - 4x** **GOA - 3x** **Corridor - 2x**

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				The current draft does not include a financial assurance requirement for long-term stewardship of enrolled bank sites. The program identifies Forterra as the prospective easement holder and Benton Conservation District as the restoration implementer but does not specify how permanent stewardship will be funded, what mechanism will hold those funds, or what happens if ownership or management responsibility transfers in the future. A restored shrubsteppe site without a funded stewardship mechanism would be an incomplete performance obligation. Restoration activities that are not maintained, monitored, and protected from catastrophic disturbance, including wildfire and invasive species, cannot guarantee the permanent habitat values the credit system is premised on. Regulatory Analog Washington State requires financial assurances for long-term management of wetland mitigation banks under WAC 173-700-354, which mandates: • A written cost estimate for annual maintenance from a qualified contractor, adjusted for inflation • Sufficient funds secured through an appropriate mechanism, including non-wasting endowments, trusts, or contractual arrangements • All long-term financing provisions addressed in the banking instrument • Financial obligations that travel with the site if ownership or management responsibility is transferred WDFW Recommendation We recommend the county's mitigation program include long-term stewardship financial assurance requirements consistent with our state standard (WAC 173-700-354). To help ensure habitat outcomes are maintained in perpetuity, the banking instrument should address the following: 1. Prior to the first credit release, the party responsible for long-term stewardship should provide a written cost estimate from a qualified contractor, including an inflation adjustment and a reserve component sized to address catastrophic disturbance events such as wildfire or invasive species outbreak. 2. A non-wasting endowment, trust, or equivalent financial instrument should be established, legally segregated from operating funds and governed by a document specifying allowable expenditures. 3. All long-term financing provisions should be specified in the banking instrument rather than deferred to future negotiation. 4. If site ownership or management responsibility is transferred, the financial mechanism should remain with the entity responsible for long-term stewardship. 5. Full capitalization of the stewardship endowment should be a condition of Stage 2 credit release, recognizing that restoration implementation without a funded stewardship obligation does not constitute complete performance. 6. The stewardship fund needs to have sufficient funds to be able to cover land stewardship activities such as invasive weed treatments, fire recovery, fence repair or maintenance.	**Other - 1x** **Credit (mitigation) side — Activity Factor by current condition:** **% of NRV** / **Mitigation Activity** / **Activity Factor** ≥ 90% / Preservation-with-enhancement / 4:1 ≥ 90% / Preservation-only / 6:1 60–89% / Rehabilitation / 3:1 < 60% / Reestablishment / 2:1 **Debit (impact) side — Quality Factor by EIA score:** **EIA (or other quality evaluation) Score** / **Quality** / **Factor** A / High / 1.0x B / Good / 0.75x C / Moderate / 0.50x D / Poor / 0.375x The County's framework uses four mitigation activities rather than three — distinguishing preservation-with-enhancement (4:1) from preservation-only (6:1) instead of a single preservation tier. The suggested ratio for preservation is 6:1 rather than 8:1 based on the rationale described above. Examples for how the program would be applied are provided below: **Example 1 — Debit** 10 acres of "Good" (EIA B) "Corridor" habitat impacted.

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					10 × 0.75 (Good) × 2 (Corridor) = **15 credits required.** **Example 2 — Credit** 6 acres of "Poor" (< 60% NRV) "Core" habitat reestablished. 6 ÷ 2 (Reestablishment) × 4 (Core) = **12 credits generated.** **Example 3 — Full transaction** 10 acres of "Poor" "Other" habitat impacted. 10 × 0.375 (Poor) × 1 (Other) = **3.75 credits required** Offset by 2.5 acres of reestablished Core: 2.5 ÷ 2 × 4 = **5 credits generated** Obligation satisfied, with **1.25 credits remaining** available. These changes are reflected in the September 2026 final draft shrubsteppe mitigation program description.
260	Debbie Berkowitz 5/27/26 Public Open house			Regarding shrubsteppe habitat, there are areas within the cities that could be protected as well, and we want to try and figure out how to do this.	Agree and this comment has been shared with the Cities as well.
261	Debbie Berkowitz July 1, 2026	General Comment		Thank you for having given several of us the opportunity to engage in discussions during the development of the Shrubsteppe Mitigation program, Critical Areas Ordinance, and portions of the comprehensive plan. I appreciate that the County is taking steps to meet the no net loss objective for critical areas as found in WAC 365-190-080, specifically for shrubsteppe and other Fish & Wildlife Habitat Conservation Areas. I hope that these new steps will help stop and, hopefully, reverse some of the ongoing loss of shrubsteppe habitat that we have been experiencing. My comments below are meant to clarify and/or further strengthen the Draft Shrubsteppe Mitigation Program and the Draft Critical Areas Code. Section I. Comments on the Benton County Shrubsteppe Mitigation Program Description WDFW is currently working on an update for the PHS shrubsteppe management recommendations including mitigation guidance. This and other future changes in WDFW guidance, including the ratios in Tables 6 and banking credits/debits need to be incorporated into this Program as an important source of BAS. This is especially critical since there is not much experience with how	Thank you for taking the time to review and comment on the draft documents, and for those acknowledgements. We agree an annual review of the program, BAS and compliance with the no net loss provision makes sense and will strengthen the discussion the updated program document to reflect this.

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				this kind of mitigation program works for shrubsteppe. It will be important to look at the program annually, especially in the first several years (though probably ongoing), to make adjustments based on results and BAS.	
262			1	P. 1 Definition of shrub steppe needs to include shrub steppe affected by fire as per the WDFW definition in Management Recommendations for Washington's Priority Habitats (Azerrad et al., updated Sept. 2020), i.e., "Fire disturbance is an ecological component of shrubsteppe. Shrubsteppe disturbed by fire may lack the aforementioned habitat components during periods of post-fire recovery."	Update as suggested
263			1 & 2	P. I last paragraph. WDFW has indicated that they are not allowed to accept payments for the acquisition of mitigation lands. Have they been able to in the past? P. 2 Kudos to Benton County for recognizing the need for regional consistency for shrubsteppe mitigation. Other than supplying data for Tables 1-3, what is the response of the cities to this document?	That is a good question; we are not exactly sure on the history of their ability to accept or not accept payments for mitigation land acquisition. Thank you – the cities are supportive of this program and its development.
264		Tables 1 and 2	3	Tables 1 and 2, P. 2 and 5. What is the total number of acres that the jurisdictions plan to develop in the next 20 years, i.e., what percent of this development impacts shrub steppe habitat? Given the rate of current development, please consider that estimates may need to be reviewed more often than approximately every 5 yrs.	We do not have this information; it would need to be requested from each City. We have included the first estimated 5-years of shrubsteppe impact in the updated program description (September 2026 version).
265			3	P. 3 ff,Fig. 2. WSRRI is used in this document to determine spatial priorities for mitigation ratios/mitigation banking. Probably one result of this is that few, if any, areas in the cities appear from the map to be included in mitigation properties (i.e., properties that would be protected), or, if they are, the mitigation ratios are low including for high quality shrubsteppe. While WSSRI downplays 'other habitat' or 'other PHS sbrubsteppe,' the Washington Habitat Connectivity Action Plan (WAHCAP) (wdfw02630, 2025) (P. 15) states that "Many smaller habitat areas (e.g., urban riparian areas, parks, or isolated forest patches [perhaps isolated shrubsteppe patches can be substituted here] did not appear as statewide priorities from the WAHCAP plan] even though they are critical to supporting wildlife and ecosystem functions at the local scale....We encourage local conservation practitioners and land managers to use the WAHCAP as a starting point and use additional data to delineate priority locations for connectivity at the local level." WAHCAP (P. 16, P. 94) continues "Across all spatial scales - statewide, regional, and local - riparian corridors emerge as crucial conservation features, particularly in fragmented or human-dominated landscapes...they should be prioritized as key conservation and restoration opportunities." mitigation program. Further discussion: From Tables 2 and 3, a large percentage of the impacted WSRRI 'other habitat' as well as the WDFW's 'Other PHS shrubsteppe' in the UGAs is rated 'good/high.' A number of these areas are parts of RMZ uplands and/or provide some connectivity value threading through the cities or adjacent county lands. They are important for priority species and species of greatest conservation concern, even if not for most shrubsteppe obligates; they provide important stopover areas for migratory birds and insects. In addition to the ecological value of the other habitat/other PHS shrubsteppe in UGAs, these areas also have an educational value. They are important for city residents, including for children, who would then have the opportunity to learn about their native habitats/plants/invertebrates/vertebrates, and, hopefully, to value them enough to support maintaining and restoring shrubsteppe habitat. These UGA areas are also important for preserving plant genetic diversity which can be hyperlocal.	We have updated the program description to reference both WSRRI and Biodiversity Areas and Corridors (BACs) from WDFW's Priority Habitat and Species (PHS) dataset as the datasets used to determine spatial priority. The PHS BAC dataset maps additional corridors within and around the cities and provides more localized connectivity and spatial priority information. The map shown in Figure 2 has been updated to reflect this. The spatial priority areas identified in the shrubsteppe program are specific to shrubsteppe- related habitat. Other habitats, such as riparian or wetlands, that are important for priority species and species of greatest conservation concern or provide important stopover areas for migratory birds and insects are separately designated as wetlands (under 15.04) or FWHCAs under BCC 15.14.010 (2) and protected under these respective chapters (15.04 and 15.14).

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				What portion of these areas in the UGAs are being considered for preservation? Mitigation proposed for high and moderately high quality 'other' habitat should be higher than a 2:1 ratio. At a 2:1 ratio, one would lose 1 acre of high-quality shrub steppe for every 2 acres preserved. Note as stated in more detail in other comments (#220-222 below), high or near-high quality shrub steppe should be protected, not restored or enhanced; thus, mitigation ratios should be higher.	Areas within. UGAs are not highly prioritized for preservation/restoration, as shown in Figure 3 of the Program Description. The updated program description includes updated credit/debit methods for impacts and mitigation, which include higher ratios for preservation. See response to comment #259 for additional detail.
266		Figure 2		Figure 2-There are a number of areas that are labeled 'other habitat' and 'other shrubsteppe' that, based on the map, look like they could help link significant corridors throughout the state (i.e., expanding the WSRRI GOAs and Corridors already labeled, e.g., along the Horse Heaven Hills). These 'other habitat' areas should be considered as extensions of these corridors. Many of these areas are considered FWHCAs in Appendix A, Figure 14 (Comp Plan maps). (And many of these potential corridors were considered as environmental conservation areas in the Least Conflict Solar Sitings mapping which is cited as a reference in WAHCAP.)	See response to comment #265.
267		Table 6		Table 6 ratios assume restoration to high reference quality for all levels of habitat quality. Several comments: a. Any shrub steppe in the high-quality category should be preserved and not restored. Restoration of high quality shrubsteppe is more likely to result in damage to the habitat than in improvement. If 'good quality' habitat is defined by the BLM AIMS score as 'slight departure,' then considerable care should be taken before deciding that restoration is preferred to preservation even in good quality habitats. Preservation is important because it protects high/good quality habitat, but it doesn't accomplish 'no netloss' of habitat function, let alone increase habitat function. Thus, preservation should require significantly higher mitigation ratios than are proposed in Table 6. b. Restoration to 'high reference quality' of moderate and low-quality habitat (and maybe the portion of good quality habitat that wouldn't suffer from restoration) would be extremely difficult, assuming that 'high reference quality would be 'near reference' with minimal human-caused alterations. This quality of shrubsteppe would contain cryptogamic soil crust, but we haven't figured out how to restore the crust, soit does not appear to be possible to restore shrubsteppe to a high reference quality. Restoration is certainly a necessary part of this process for areas of shrub steppe that are not already high quality (or, depending on the definition, good quality), but to assume that the restoration process will result in shrubsteppe that is comparable to high quality 'near reference' quality habitat that is being destroyed is not reasonable. It's difficult and takes time to restore shrub steppe to even a good quality habitat, yet this is not being taken into account in the ratios that are being suggested. Restoration or re-establishment of low or moderate quality shrubsteppe to reasonably good quality shrubsteppe is likely what can be expected unless further research into restoration of biocrust allows for better results. c. The amount of money that's being proposed per acre is insufficient for significant restoration work, even to good quality habitat. d. It is not at all clear where these ratios come from or how they translate into mitigation banking credits and debits. It's also not clear how the range of quality categories are defined or how the EIA or BLM AIMs scores are translated to Table 6 quality scores or to credit/debit calculations. More clarity would give the public a better understanding of how this whole process works and achieves greater ecological function and value and long term viability than on-site mitigation (see my comment re 15.14.060(b)(l).	The County agrees that the original Table 6 framework did not clearly distinguish among preservation, restoration, enhancement, and reestablishment and could be read to assume that all mitigation sites would be restored to a uniform high-reference condition. In response to WDFW's comments, the Shrubsteppe Mitigation Program Description has been revised to use a decoupled, activity-based credit and debit framework. Under the revised approach, impacts generate debits based on habitat quality and spatial priority, while mitigation credits are calculated separately based on the type, extent, and anticipated ecological benefit of the mitigation action. Preservation, restoration, enhancement, and reestablishment are therefore treated as distinct activities. High-quality shrubsteppe would generally be preserved and managed to maintain existing condition rather than subjected to unnecessary restoration. Restoration or enhancement of good-quality habitat would occur only where site-specific assessment identifies functions that

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					can be improved without damaging intact habitat. Preservation credits are discounted relative to activities that produce measurable functional lift, meaning that preservation-only mitigation would generally require more acreage than successful restoration or reestablishment. Credits for restoration, enhancement, and reestablishment are based on the reasonably anticipated improvement from existing conditions and account for the magnitude, certainty, timing, and durability of the expected ecological gain. Credit generation would be supported by site-specific plans, performance standards, monitoring, and adaptive management. The revised program also clarifies how field methods, including the Ecological Integrity Assessment and BLM Assessment, Inventory, and Monitoring framework, may be used to characterize habitat condition and document change. Implementing guidance will establish the applicable indicators, scoring methods, reference conditions, and procedures for translating field results into habitat-condition and functional-lift scores. See response to comment 259 for additional detail. See also response to Comment 204 on credit cost.
268		Figure 4		Figure 4-see comment about Figure 2. It seems like the spatial priority 'other' excludes a number of areas of high-quality habitat that would function as corridors; these areas should have a higher credit value than is proposed in this figure since at least some of them would expand corridors.	Figure 4 has been updated to clarify that Core Areas include both WSRRI Xeric Core Areas and WDFW PHS Columbia Plateau Regional Biodiversity Areas, and Corridors include both WSRRI Xeric Corridors and WDFW PHS Columbia Plateau Regional Biodiversity Corridors. Figure 2 has also been updated to

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					display both datasets. These revisions better reflect areas that provide core habitat or support movement among key habitat areas.
269			12	P. 12. There appears to be no requirement that WDFW have input into the critical area report provided by the applicant. WDFW must be given a better opportunity to provide BAS guidance (i.e., not just the standard window of review).	See response to Comment 185
270		Figure 5		Figure 5. Credit sales and credit generation as well as properties for acquisition all need to have input from WDFW.	See response to Comment 197
271			15	P. 15 - Mitigation ratios for WDFW Wind and Solar Guidance should not be used for shrubsteppe-specific guidance.	Agreed – mitigation ratios are being updated as provided in response to Comment #259
272			18	P. 18 - Credit Release Staging. 'Projects that only involve preservation will release....' Yet Table 6 assumes that all projects will involve restoration, not just preservation. What are the ratios/credits for 'just preservation '?	Thank you for pointing this out. The mitigation ratios listed in Table 6 are being updated as provided in response to Comment #259. Clearer ratios tied to the specific mitigation activity and based on the existing condition of the mitigation site, are now provided in the program description as Tables 6 and 7.
273			17	P. 17 - Impact Example 1 a. First consideration- Since this is a patch of 'near reference' quality habitat, it should be worth more credits, especially since the restoration of the moderate quality GOA area is likely to not result in better quality than the 'near reference' quality habitat that is being destroyed for development. So, this would replace 10 acres of 'near reference' quality shrub steppe with 7 acres of lesser quality shrub steppe. This appears to be a net loss of shrubsteppe habitat. b. Second consideration -Is this an isolated 10-acre patch of habitat or does it have some connectivity to other habitat patches? If the latter is the case, then it is also worth more than a .7:1 ratio. c. Third consideration- $4,000 per acre is insufficient to restore this habitat even to a good quality. The current cost of $3,500 to $4,000 per acre in current agreements has been noted as being barely sufficient to pay for land, let alone having money left to put it in a conservation easement or to pay for restoration costs or short-term and long term monitoring. And $3,500 to $4,000 per acre is insufficient to pay for restoration to even a good quality (example is WE Johnson Park, where there were no land costs and $3,500 per acre is enough for native grasses and maybe a few shrubs, not 'high' reference or even good quality shrub steppe).	Thank you for the comment. The worked examples have been revised to reflect the updated credit and debit framework, including separate consideration of habitat quality, spatial priority, and mitigation activity. Site-specific review will also address connectivity and other functions not fully reflected in mapped categories. The revised program no longer assumes restoration to a uniform high-reference condition. Credits are based on the mitigation activity and expected ecological uplift, with preservation and restoration treated separately. The previously identified per-acre amounts were preliminary planning estimates and are not intended to establish final credit pricing or restoration costs. See also the response to Comment 166 regarding credit costs. See also response to Comment 204 on credits cost.
274			17	P. 17 - Impact example 2. WSRRI Core habitat should have a much higher ratio to discourage its destruction.	Program ratios are being updated to provide a broader range of ratio values.

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275			18	P. 18 - Accounting for restoration/enhancement. If the developer pays for all the credits at the initiation of the project and is then allowed to develop his land, what happens if the price is insufficient to cover the actual costs of purchase/conservation easement, restoration process, and initial and longterm monitoring? The credit release table indicates that restoration credit is released in stages. How long do stages 2 and 3 last to ensure that restoration actually is effective? And what happens if future vandalism or fire or other events impact the restored habitat?	The credit price will be established to cover anticipated land acquisition or conservation easement costs, activity-specific restoration and enhancement, monitoring, administration, and long-term stewardship. Updated cost assumptions are being developed with a regional land trust experienced in mitigation-bank acquisitions and using current restoration cost data. The credit release schedule has been revised to release 25% when the conservation easement is secured, 50% after activity-specific implementation and establishment of the stewardship fund, and the final 25% after follow-up assessment shows progress toward quality benchmarks and functional lift. The credit release stages occur when the initial performance of the condition is achieved to provide a feasible project timeline for developers. Subsequent damage after restoration occurs will be handled through long term stewardship reserve funding included in each mitigation transaction, as described in the updated program description.
276				Who pays for the land purchase and the follow-up restoration where required. And then how are the longterm monitoring, maintenance, and protection covered. It is not clear from the document how all these financial considerations will be covered.	The land purchase will come from funds provided to Benton Conservation District from the development community. Long-term program administration costs, including maintenance and protection, are being built into the cost structure for the per acre impact fee.
277				How do these ratios compare to ratios in mitigation banking for wetlands? Based on CAO section 15.04, it seems like compensatory mitigation ratios are significantly higher for wetlands. Shrubsteppe habitat in eastern WA is seriously threatened and should have more comparable ratios.	The update ratios being included in the program provide a broader range of potential values, including higher values, similar in concept to wetland ratios, where higher ratios are required for protection only for example.
278				How are fire-disturbed areas taken into account? Many have the potential for recovery, especially if they are restored soon after a fire occurs. Note, for example, WDFW studies related to caching sagebrush in areas that have recently been subject to fires. Also, consider if we're looking at one 500 acre parcel to mitigate for numerous other parcels, what are the consequences if it all goes up	See response to Comment 205

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				in flames? If a fire occurs after preservation and/or restoration, what recovery efforts will be made to protect the habitat long-term? How will this be dealt with financially?	
279				In a previous iteration, the County was considering a 'mitigation review team.' That has disappeared from this latest document, but seemed like a good idea, especially during establishment of this process (and, perhaps, continuing, similar to VSP). This should include WDFW and members of the public, including those with expertise and interest in shrub steppe habitat. I.e., what kind of public input and review is proposed?	See response to Comment 208
280	Ag Reserves Jens Rasmussen July 2, 2026			We also appreciate the County's efforts to provide a simpler and more defined framework for shrub-steppe mitigation and critical area protection that appropriately balances resource protection and future development opportunities. As those provisions are finalized, we encourage the County to prioritize clear and predictable mitigation standards so that landowners and developers can better understand requirements early in the planning process and so that shrub-steppe analysis does not create unnecessary delays for future development. The County should also retain flexibility for site-specific scientific review where appropriate, particularly with respect to Riparian Management Zones (RMZs) and habitat mitigation requirements. The ability to demonstrate equivalent resource protection through site-specific analysis can help ensure both effective resource protection and practical implementation.	Comments noted; we try to provide flexibility in meeting the requirements where possible and consistent with achieving no net loss of ecological function.
281	Patrick Paulson Laurie Ness July 2, 2026	15.02.210		Shrubsteppe Mitigation Requirements Inconsistent Draft BCC 15.02.210 states (d) Activity-Specific Ecological Uplift - Mitigation activities (re-establishment, rehabilitation, enhancement, preservation) should be distinguished by their expected ecological uplift, ensuring that the degree of functional gain is proportional to the magnitude of impact. The GMA requires the mitigation to achieve "no net loss" of habitat value, not just that the uplift is "proportional to the magnitude of impact". Here's one possible edit: (d) Activity-Specific Ecological Uplift – The expected uplift of mitigation activities (re-establishment, rehabilitation, enhancement, preservation) should exceed the net loss of function and value caused by the activity.	Update this provision to read: d) Activity-Specific Ecological Uplift - Mitigation activities (re-establishment, rehabilitation, enhancement, preservation) should be distinguished by their expected ecological uplift, ensuring that the degree of functional gain is proportional to the magnitude of impact <u>to achieve no net loss of ecological function.</u>
282		15.14.050 (b)		Shrubsteppe Mitigation Requirements do not ensure no net loss using BAS Draft CAO § 15.14.050 (b) and the Benton County Shrubsteppe Mitigation Program Description[34] depends on a mitigation program that is still in its planning stages. It would be difficult, if not impossible, to determine how the text given Draft BCC 15.14.060 can be read as development regulations and how those regulations would result preservation of Shrubsteppe Habitat value as required by WAC 365-196-485 (1) (b)[35]. The Draft CAO language appears to offer a guarantee to developers that an offsite mitigation bank will be available. But the regulations only seem to assume that sometime, in the future, there will be mechanisms to provide off-site compensatory mitigation. The current language does nothing to guide developers and citizens trying to follow the regulations. Nor does this language provide a alterative habitat for species to persist or even exist in the interim. The CAO cannot contain regulations that depend on a program that cannot be evaluated to determine whether it will result in no net loss of Shrubsteppe functions and values. References to the program should be removed from the CAO until the program is better defined and meets the Growth Management Act's (GMA) BAS requirements.[36] The CAO should only state that there will be no net loss of shrubsteppe habitat function and values and the county has a compensatory mitigation program to assist in finding mitigation opportunities. 34 Benton County Shrubsteppe Mitigation Program Description, hereafter referred to as Compensatory Mitigation Program (SCMP). 35 "Jurisdictions are required to include the best available science in developing policies and development regulations to protect the functions and values of critical areas." https://app.leg.wa.gov/wac/default.aspx?cite=365-196-485 36 RCW 36.70A.172.1: "In designating and protecting critical areas under this chapter, counties and cities shall include the best available science in developing policies and development regulations to protect the functions and values of critical areas".	Thank you for this perspective. The shrubsteppe mitigation program will continue to be referenced in the CAO as one of the options expected to be available when shrubsteppe mitigation is required.
283	Patrick Paulson Laurie Ness July 2, 2026	Draft Shrubsteppe Mitigation Program and 15.04.050 (b)		Sources used to develop model are unclear and incomplete [[Cite BAS about shrubsteppe habitat value. Court cases/board rulings about functions/values.]] The SCMP description provides incomplete citations making it difficult to determine the quality of science the program is based on. It appears the two sources of information used to develop the County's models are "WDFW PHS Shrubsteppe Habitats" and	Thank you for identifying these additional sources. The program description and BAS references have been updated to more clearly

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				"[Washington Shrubsteppe Restoration and Resilience Initiative (WSRRI)] Xeric Habitat Spatial Priority Data". Additional sources that should be consulted include: • Washington Wildlife Habitat Connectivity Working Group's analysis of the Columbia Plateau Ecoregion[37], • Spatial Conservation Priorities in the Columbia Plateau Ecoregion from (Arid Lands Initiative 2014) • Washington's State Wildlife Action Plan (WDFW 2025)[38] • WDFW's PHS management recommendations for Shrubsteppe (Azerrad et al. 2020) • WSU Least Conflict Solar Siting Conservation Value Map 37 Washington Wildlife Habitat Connectivity Working Group. 2012. Washington Connected Landscapes Project: Analysis of the Columbia Plateau Ecoregion. https://waconnected.org/wp-content/themes/whcwg/docs/WHCWG_ColumbiaPlateauEcoregion_2012.pdf 38 WDFW 2025. Washington's State Wildlife Action Plan: 2025 Update, hereafter referred to as "WDFW Action Plan" Many of these sources are recommended in WDFW's document Priority Habitats and Species Shrubsteppe Decision Support Tools: Implementation Guidance for Land-use Planners and VSP Workgroups Decision Support Tools (WDFW 2024)	identify the information reviewed and the datasets used in the spatial analysis. Many of the listed sources were reviewed and considered during program development, including the Columbia Plateau connectivity analysis, Arid Lands Initiative conservation priorities, Washington State Wildlife Action Plan, Washington Habitat Connectivity Action Plan, WDFW shrubsteppe guidance, and WSU Least-Conflict Solar Siting Conservation Value data. These efforts provide important regional context for habitat connectivity, conservation priorities, species needs, and landscape resilience, but generally reflect broader-scale data. WSRRI spatial priorities and WDFW Biodiversity Areas and Corridors were found to provide better spatial resolution for identifying the spatial priority of parcel scale impacts. The County's overall approach remains consistent with the priorities identified in these other regional planning efforts. The spatial priority modeling does not attempt to independently combine every available regional model. WSRRI Xeric spatial priorities and WDFW Priority Habitats and Species Biodiversity Areas and Corridors were selected as the primary spatial-priority datasets because they synthesize many of these underlying conservation and connectivity sources into regionally applicable Core Areas, Growth Opportunity Areas, Corridors, and "other" habitat. WDFW's mapped shrubsteppe data were used to identify habitat extent, while the Benton County Conservation District quality model and other field assessment methods address habitat condition. The other listed sources may also be used by qualified professionals to evaluate habitat functions and species use at proposed impacts and mitigation sites, as applicable. The revised program description provides additional details about the sources consulted

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					to develop the quality model and inform the quality and spatial priority framework.
284	Patrick Paulson Laurie Ness July 2, 2026	Draft Shrubsteppe Mitigation Program and CAO 15.14.060 (b), Table 1		Proposed Assessment Methodology incompletely models functions and values of Shrubsteppe The WDFW Action Plan notes that over 50 Species of Greatest Conservation Need (SGCN) are closely associated with shrubsteppe and notes "The large number … and broad diversity of SGCN that are closely associated with shrubsteppe vegetation communities really emphasize the habitat importance of that system and conservation need."[39] Support of these species should be included in the evaluation of net loss of impacts to Shrubsteppe habitat. The model for determining debits and credits of habitat destruction (debit) and mitigations (credits) is illustrated in Figure 4 of the Compensatory Mitigation Program. This model seems reasonable for determining the credit to be assigned to a mitigation effort – for example, the credit for restoring a corridor to highest quality should be about the same as the credit for restoring core habitat to moderate quality. However, impacts (or debits) cannot be determined by solely by using WSSR spatial priorities and the proposed function scores. The impact of destroying poor quality corridor that connects two large areas of quality shrubsteppe might be higher than the impact of destroying a similarly sized area of high-quality GOA shrubsteppe. Likewise, marginal, low-quality areas rated with a spatial priority rating of 'Other' might have high functional value if no other shrubsteppe is nearby, perhaps serving as a migration stop-over site for Shrubsteppe endemic species. The mitigation ratios given in Table 1 of Draft CAO 15.14.060 (b) (equivalently Table 6 in the Compensatory Mitigation Program) assign the same ratios to all areas that have the same spatial priority and habitat value, but we've given two examples that show the habitat value of two areas with the same spatial priority and habitat value can vary significantly. As noted by WDFW, Mitigation activities (re-establishment, rehabilitation, enhancement, preservation) should be distinguished by their expected ecological uplift, ensuring that the degree of functional gain is proportional to the magnitude of impact.[40] Because of the failure to fully account for the impacts to habitat value of shrubsteppe tracts, the mitigation ratios fail to ensure no net loss of habitat function and value.[41] Designing a metric that truly represents the extent of impact to habitat values and functions – a metric based on best available science – isn't a task to be taken on lightly. One possible alternative for compensatory mitigation is to treat all impacts as impacts to high quality core Shrubsteppe, requiring mitigation credits equivalent to the ecological uplift of restoring poor-quality habitat with a spatial priority of 'other' to high-quality 'Core' shrubsteppe at a 2:1 ratio. Compensatory mitigation is required to be used only as a last resort according to the mitigation sequence given in Draft CAO §15.02.200. 39 P. 144. 40 WDFW Comments on Drafts, p. 1. 41 Supra 35.	Thank you for the comment. The Washington State Wildlife Action Plan and other regional sources were reviewed during program development and provide important context regarding shrubsteppe-associated Species of Greatest Conservation Need, connectivity, and landscape resilience. However, the proposed framework in the program description does not attempt to combine every available regional dataset into a single model. WSRRI spatial priorities and WDFW Biodiversity Areas and Corridors were selected as the primary spatial-priority datasets because they provide the best available parcel-scale reflection of spatial priority. The County recognizes that landscape-scale models cannot capture all site-specific functions and values of variable and spatially interconnected shrubsteppe habitat. For proposed shrubsteppe impacts, site specific review by a qualified professional will allow important habitat values not fully reflected in the spatial priority categories to be accounted for in the quality assessment. The revised program framework now separates debits from credits and applies activity-specific ratios based on mitigation-site condition and the expected ecological uplift from preservation, preservation with enhancement, rehabilitation, or reestablishment.
285	Patrick Paulson Laurie Ness July 2, 2026	Table 1		Additional sources for assessing function/value of fragmented habitat Data compiled by eBird[42] provides informal evidence that within our local urban areas shrubsteppe birds seem more likely to stop over in small patches of shrubsteppe habitat rather than habitat that does not contain shrubsteppe (Table 1). *Table 1. Occurrence of Shrubsteppe birds in Urban Shrubsteppe*	Thank you for providing this information. The County will consider its applicability in applying critical area shrubsteppe protections in more urbanized areas of the County and will also share this information with the cities for their consideration.

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				eBird Hotspot	Habitat	Time Period	Occurrence of Shrub Steppe Birds (# of weeks)	
				Amon Creek Willowbrook Section	Shrubsteppe, Riparian	April, All Years (74 Checklists)	Say's Phobe (4 weeks), Western Kingbird (1), Black-billed Magpie (1), Common Raven (4), Brewer's Sparrow (1), Savannah Sparrow (1)	
						May, All Years (57 Checklists)	Say's Phoebe (4 weeks), Western Kingbird(3), Black-billed Magpie (2), Common Raven(4), Horned Lark(1), Chipping Sparrow(2), Brewers Sparrow(2), Savannah Sparrow(1), Lazuli Bunting(4)	
				Chamna Natural Preserve	Shrubsteppe, Riparian	April, All Years (37 Checklists)	Say's Phoebe (3 weeks), Western Kingbird (1 week), Black-billed Magpie (3 weeks), Common Raven (2 weeks), Savannah Sparrow (1 week)	
						May, All Years (59 Checklists)	Say's Phoebe (3 weeks), Western Kingbird (4), Black-billed Magpie (2), Common Raven (3), Chipping Sparrow (2), Lark Sparrow (2), Savannah Sparrow (1), Western Meadowlark (2), Lazuli Bunting (4)	
				Howard Amon Park	Turf grass, river shore	April, All Years (42 Checklists)	Say's Phoebe (1 week)	
						May, All Years (28 Checklists)	No Shrubsteppe Birds.	
				Steptoe Roundabout Pond	Wetland	April, All Years (31 Checklists)	No Shrubsteppe Birds.	
						May, All Years (25 Checklists)	No Shrubsteppe Birds.	
				Yakima Delta HMU	Primarily Riparian	April, All Years (11 Checklists)	No Shrubsteppe Birds.	

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				<table><tr><td></td><td></td><td>May, All Years (19 Checklists)</td><td>Western Kingbird (1), Blackbilled Magpie(1)</td></tr></table> Recent scholarship is placing higher value on habitat within urban settings; replacing fragmentary habitat with off-site mitigation could result in loss of migratory stop over sites for songbirds and further fragment habitat corridors. Jimenez et al. 202543 "…used stopover densities as estimated by 10 million remote sensing scans to assess stopover patterns in urban areas across the [continental U.S.]". Their abstract notes that "stopover hotspots disproportionately occur on urban landscapes relative to their land area, with nearly half of migration hotspots falling within Metropolitan Statistical Areas" Moore, et. al 199344 noted in their management recommendations that: ...the rigors of migration often place birds close to their physiological limits in unfamiliar landscapes, where they simply do not have the luxury of selecting alternative habitats. Therefore, a lack of suitable stopover habitat will result in death or reproductive failure for Neotropical migrants and contribute substantially to future population declines. 42 Sullivan, B.L., C.L. Wood, M.J. Iliff, R.E. Bonney, D. Fink, and S. Kelling. 2009. eBird: a citizen-based bird observation network in the biological sciences (eBird). Biological Conservation 142: 2282-2292	

EIS Comments

286	Dept. of Energy 6/17/26	Figure 3-1,	21	HFO cannot guarantee the factual accuracy of the Hanford information throughout the document including figures depicting the Hanford Site. One example of a change would be to correct all DOE Hanford Site maps that label the area south of State Highway 240 as the Saddle Mountain National Wildlife Refuge to read Fitzner-Eberhardt Arid Land Ecology Reserve. Basis -Saddle Mountain is located on the north side of the Columbia River, outside of Benton County. There is no Saddle Mountain National Wildlife Refuge.	Understood. We will consider these updates and make appropriate corrections based on this input.
287		General		Recommend that language describing renewable energy projects on Hanford not use the word "allowable" in this context. Instead, update wording to reflect that DOE itself may allow renewable energy projects to be developed on Hanford. "In addition, the U.S. Department of Energy may also allow renewable energy projects to be developed on the Hanford Site, which would be evaluated through the NEPA process." Basis - The current wording may be interpreted as allowing or disallowing the development of renewable energy projects on the Hanford Site, which is outside the scope of the EIS.	Update as suggested
288		General maps and text		The identification of Hanford itself is inconsistent (i.e. Hanford Area vs. Hanford Site vs. Hanford Reservation vs. Hanford Nuclear Reservation vs Hanford Reach, etc.) Basis - Edit all documents and maps for consistency and identify as the Hanford Site and the river portion as the Hanford Reach.	Update as suggested
289		General maps		The county did not coordinate with HFO in the development of the Hanford relevant portions of the document and while HFO has provided come comments and proposed edits based on it it's review, HFO cannot guarantee the factual accuracy of the Hanford information throughout the document including figures depicting the Hanford site. Basis - Specific input on notable map inconsistencies are provided as separate comments. However, there may be additional items that were not addressed with these comments.	Understood. We will consider these updates and look for any additional inconsistencies that might exist.
290		Table 11.05.020-1, Zoning District, Page 11-37, or 42 of PDF.		The "Unclassified" zoning district has no definition. As a zoning district that's wholly on the Hanford Site, it should be described as such and noted that it is governed by the Department of Energy and its regulations.	Purpose statement in Zoning describes "Unclassified as does the comprehensive plan. The County permits uses other than USDOE on Hanford, including all non-federal activities.
291		General		Any proposed land use identified in this plan for property previously transferred from the U.S. Department of Energy to the community should be consistent with all deed restrictions and environmental covenants established at the time of transfer. These long-term institutional controls are intended to ensure continued protection of human health and the environment.	Understood

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292	WDFW Scott Downes 6/11/2026			SUBJECT: WDFW comments on Benton County draft 2026 Comprehensive Plan Environmental Impact Statement (EIS) Dear Mr. Wendt, Thank you for the opportunity to review the Benton County draft 2026 Comprehensive Plan Environmental Impact Statement (DEIS). The Washington Department of Fish and Wildlife (WDFW) has reviewed the DEIS and its supporting elements and appendices. We appreciate that many positive aspects have been included in the plan for the protection of fish and wildlife habitats, including incorporating wildlife connectivity into various elements including transportation and open space planning. Alternative 3 in the DEIS presents a balance of resource and habitat protection with moderate growth protections, particularly focusing on growth within the urban growth areas while trying to preserve open space and critical habitats. WDFW is pleased to work with the county on the development of the shrubsteppe mitigation bank to conserve high value shrubsteppe habitat while providing a path for development and offsetting the losses to shrubsteppe from those developments. We also appreciate that Alternative 3 converts some of the industrial shoreline areas to public use, enhancing ability for shoreline protections. From a fish and wildlife habitat viewpoint, WDFW recommends adoption of Alternative 3 in the DEIS.	Thank you for this input on the DEIS and expressed support for Alternative 3
293	KID July 2, 2026	3.2.1.5 Water Use and Water Rights	30	Last sentence in first paragraph - Irrigation districts such as the Kennewick and Benton Irrigation Districts rely on a combination of "Yakima" River instead of Columbia	Update as suggested
294	KID July 2, 2026	3.2.3 Probable Environmental Impacts	33	First paragraph last bullet add - withdrawal from wells with no replenishment depletes the shallow aquifer.	Update as suggested

Benton County Comprehensive Plan and Critical Areas Code – Final Comment Response Matrix Addendum to Incorporate Comments Made at October 6, 2026, Planning Commission Hearing (October 23, 2026)

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Comments on Comprehensive Plan and Critical Areas Code					
295	Patrick Paulson and Laurie Ness	Parks Element		There is not a master plan for Horn Rapids Park; please update the description accordingly.	Updated to reference the County's Comprehensive Parks Plan, which was recently adopted and includes a discussion on Horn Rapids Park included in it
296		15.02.070		While this text [RMZ definition] seems comprehensive, I would like to see a citation for the source. As suggested by Ms. Berkowitz, WDFW's definition should be placed here either instead of or in addition to this definition	The County finds that the RMZ definition is adequate for describing RMZ and associated functions and values
297		15.02.070		Definition – qualified professional - We find the County's response to be inadequate. Many other jurisdictions have been able to specify reasonable credentials for qualified professionals that are tailored to the expertise needed to properly evaluate critical areas. We suggest the following text for the definition of a qualified professional: • Qualified professional-A person with experience and training in the pertinent scientific discipline, and who is a qualified scientific expert with expertise appropriate for the relevant critical area subject in accordance with WAC 365-195- 905(4), as it now exists or may be hereinafter amended. • A qualified professional must have obtained a B.S. or B.A. or equivalent degree in wildlife biology, ecology, conservation biology, engineering, environmental studies, fisheries, or related field, two years of related work experience, and an informed use of the PHS Biodiversity Areas and Corridors Map..	Update qualified professional definition for fish and wildlife habitats to read: "(i) A qualified professional for fish and wildlife habitats must have a degree in a B.S. or B.A. or equivalent degree in wildlife biology, ecology, conservation biology, environmental studies, fisheries, or related field and two years of related work experience biology and professional experience related to the subject species or habitat."
298		15.02.070		Hazard Tree - County did not address prior definition comment. Update to include this WDFW definition given in Riparian Recommendations (p. 65): Hazard Tree– A tree that a jurisdiction's building official or other recognized professional (e.g., certified arborist, registered landscape architect, or certified forester) has determined poses a near-term hazard to public safety or to an existing permanent structure or public utility	Remove hazardous tree definition and replace with this Hazard Tree definition: "(34) Hazard Tree - A tree that poses a direct threat to life, property, or public safety due to structural defects, disease, damage, or instability."
299		15.02.130.b.4.i and ii		Change heading of 15.02.130.b.4.i to read "Wetlands and their buffers" Change heading of 15.02.130.b.4.ii to read "Fish and Wildlife Habitat Conservation Areas and their Buffers"	Update as suggested
300		15.02.210		Mitigation sequencing - Debbie Berkowitz commented and we support that the CAO text should be: • clarified to ensure consistency with the County's general mitigation provisions in BCC 15.02.210– • .230 and WDFW Policy M-5002 … The staff responded that the text has been "[u]pdated as suggested, and reflected in the latest draft code section on the County website." But there is no reference to the mitigation sequencing general provisions in the revised code. Also, fix formatting error where first mitigation step – avoidance not numbered.	Update formatting for first mitigation step, as noted. Add reference in 15.14.050 to mitigation sequencing section (15.02.210)
301		15.14.010		Please consider the following alternate text (after consultation with WDFW):	Update as suggested (and verified with WDFW)

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				"(ii) The State of Washington's Department of Fish and Wildlife should be consulted for current listing of priority habitats and species. Riparian Management Zones (RMZs) define the boundaries of Riparian Ecosystems, a priority habitat."	
302		15.14.020		Habitats and Species of Local Importance Editing errors Planning Administrator/Planning Director - Both terms are used throughout; we assume they refer to the same role and so only one term should be used. We'll use 'Administrator' since that's what's used initially in the draft code. First paragraph of 15.13.020 is missing label - The label "(a)" is missing in Dev. Reg. Staff Report. Section missing a paragraph requiring public hearing regarding HSLI - Paragraph 15.14.020(e) of the Draft CAO is missing entirely from Dev. Reg. Staff Report; it is replaced entirely by what was previously numbered (f): • (e) The Board of Commissioners shall take action to approve or deny the proposal to designate a habitat or species of local importance. Action to approve will be based on all of the following: • (1) Satisfies the criteria and includes the information required in subsection b; • (2) Best available science supports the subject species or habitat of local importance; • (3) Management strategies are practicable; and • (4) Without protection, there is a likelihood that the species or habitat will not persist over the long term. Additional criteria for approval by Board of Commissioners should be removed - We request the following changes to the procedure for designation/de-designation of HSLI (paragraph e in Dev. Reg. Report, paragraph f in Draft CAO): • The Board of Commissioners shall take action to approve or deny the proposal to designate a habitat or species of local importance. Action to approve will be based on all of the • following: (1) Satisfies the criteria and includes the information required in subsection b; and (2) Best available science supports the subject species or habitat of local importance; (3) Management strategies are practicable; and (4) Without protection, there is a likelihood that the species or habitat will not persist over the long term. If there is a requirement for BAS then that should be made clear in the requirements for nominating a habitat or species. Moreover, the requirement that only habitats and species will not persist is imprecise: it might be desired to protect a population within a specific geographical region of the County, and this provision could be read as preventing such a population being designated as HSLI. Recommendations shall be considered by the Planning Commission - The Draft CAO seems to give the Planning Administrator veto power over HSLI recommendations, rather than just making a recommendation to the Planning commission. Please clarify that the planning director only makes a recommendation by altering text for 15.14.020.e: (e) The Planning Commission shall hold a public hearing for proposals recommended for action by upon receiving the Planning Administrator's recommendation. After the hearing the planning Commission shall and make a recommendation to the Board of Commissioners to approve or deny the recommendation based on the standards enumerated in subsection b.	Updated to address editing errors Change "recommendations" to "nominations" Add back in inadvertently deleted paragraph: "(e) The Planning Commission shall hold a public hearing for proposals recommended for action by the Planning Administrator and make a recommendation to the Board of Commissioners to approve or deny the recommendation based on the standards enumerated in subsection b."

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				The point is that all nominations are forwarded by the Planning Administrator to the Planning Commission along with a recommendation, not just those that the Administrator decides should be forwarded. The County agreed to update paragraph (e), however, as noted above, paragraph (e) is missing entirely from Dev. Reg. Report. Draft code provides no feasible mechanism for nomination of Habitats and Species of Local Importance - In our comment we stated (I've made a correction in the comment, emphasis added): • Draft CAO section 15.14.020 doesn't provide a mechanism for nomination of habitats and species of local importance (HSLI). As written, the planning [administrator] has sole discretion on whether to present recommendations regarding HSLI. Please consider the following edits: a) Any person may nominate for designation, or propose de-designation, of a species or habitat of local importance. Nominated habitats or species must meet the definition in section 15.02.070. Proposals for de-designation of a species or habitat of local importance shall follow the same process as a nomination for designation, except the proponent shall demonstrate that all designation criteria in subsection (b) no longer apply, such as due to federal or state de-listing of protected species, recovery has been achieved, or other facts that support that the species is no longer vulnerable or is protected through other means. (b) Nominations for habitats or species of local importance shall include the following: […] (c) Proposals Nominations shall be reviewed by the County and may be forwarded to the State Departments of Fish and Wildlife, Natural Resources, and/or other local, state, federal, and/or tribal agencies, or experts for comments and recommendations. As we read Draft CAO provision BCC 15.14.020 we found it nonsensical and were surprised the County didn't take our suggested text; it seems we are not on the same wavelength. To us, it seemed like the provision said that only the Planning Administrator could make nominate a habitat or species for designation as HSLI, as well as the person responsible for determining the requirements that would have to be met by the nomination, as well as the person responsible for determining if those requirements are met! Re-reading the provision, we're thinking the problem is the overloading of the term "recommendation". It seems the County uses the same term in 2 different senses: 1. The evidence supporting the nomination of a habitat or species as HSLI presented to the Planning Administrator. E.g. "Recommendations for designating or de-designating habitats or species of local importance must meet the definitions" and "Recommendations for designating habitats or species". 2. The decision by the Planning Administrator on whether the evidence supporting the nomination meets the requirements given in the code: "The Planning [Administrator] shall evaluate … and make a recommendation to the Planning Commission…" Here's another go at editing this provision, using the term "nomination" for the sense "evidence supporting a nomination for designation or de-designation" and reserving the term "recommendation" for the decision of the Planning Administrator. [(a)] When presented with supporting evidence, the Planning Administrator may recommend designating or de-designating a habitat or species of local importance. Habitats or Species nominated for designation as habitats or species of local importance must meet the definitions in Chapter 15.02.070. While this section is focused on designation of habitats and species of local importance, the criteria listed in subsection 15.14.020(b) shall also be addressed for de-designation describing how these designation criteria no longer apply and including supporting justification. WDFW should be consulted when the de-designation process is started. b) Nominations for a designation of habitats or species of local importance shall include the following: (1) … [list of provisions about identification criteria for nominated habitats and species]	

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				The Planning Administrator has the authority to alter these requirements if he/she determines that alternative methods of identification or characterization are more accurate or reliable. …6) The Planning [Administrator] may, on a case-by-case basis, require additional information needed to evaluate the resource being proposed. (d) The Planning [Administrator] shall evaluate the supporting evidence according to the characteristics enumerated in this section and make a recommendation to the Planning Commission based on those findings.	
303		15.14.050		The updated text in Dev. Reg. Report is incomplete: • (4) RMZ Width Increase The Planning administrator shall have the authority to increase the width of a RMZ on a case-by-case basis when such an increase is necessary to achieve any of the following, as documented through preparation of a Critical Areas report or through technical review comments by a state or federal agency responsible for fish and wildlife species and habitat, and supported by best available science. Missing "any of the following… please add • A. Protect fish and wildlife habitat, maintain water quality, ensure adequate flow conveyance; provide adequate recruitment for large woody debris, maintain adequate stream temperatures, or maintain or improve existing in-stream conditions. • B. Compensate for degraded vegetation communities or steep slopes adjacent to the drainage. • C. Maintain areas for channel migration. • D. Provide adequate pollution filtration functions. • E. Protect adjacent or downstream areas from erosion, landslides, or other hazards	Update as suggested
304				RMZ averaging - We submitted comments regarding RMZ averaging. The County's response doesn't fully address our concerns. The County has set the minimum RMZ width at 100' primarily to protect streams from nitrogen runoff and other pollutants. As noted by the County, pollutant removal requirements could be addressed by areas of "[non-riparian] vegetation, including native and non-native plants of varying habitat value including completely disturbed areas". But the functional requirement of pollutant will be met only if the area outside the reduced RMZ is maintained in its current condition and not converted to impermeable surfaces or to other uses. We suggest that this condition would be best met by ensuring the area is considered part of the RMZ. If the RMZ width is reduced, the County must assume the area outside the RMZ will not be maintained in its current state and therefore it will have an increased inflow of nitrogen and other pollutants into the stream. This reduced functionality must be offset by an increase in other ecosystem functions —that is, the increased RMZ width resulting from the averaging must be viewed as a Compensatory Mitigation. Further, since increasing RMZ width in one part of the stream does not decrease the flow of pollutants to the area/stream; a decreased RMZ width cannot be viewed as "in-kind" mitigation. Therefore, the ratio of area added to the RMZ by increasing its width to the area removed by decreasing the width must be greater than 1 to 1 to achieve compliance.	No additional changes were made to averaging section. However, we moved text around and broadened the discussion to show that the provisions apply to both RMZs and buffers. Additionally, we made the following updates for RMZ and buffer width increases, adding back in missing criteria for width increases: (i) Protect fish and wildlife habitat, maintain water quality, ensure adequate flow conveyance; provide adequate recruitment for large woody debris, maintain adequate stream temperatures, or maintain or improve existing in-stream conditions. (ii) Compensate for degraded vegetation communities or steep slopes adjacent to the drainage. (iii) Maintain areas for channel migration.

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				We further note that no ecological advantage is gained by allowing RMZ averaging so that RMZ width can be increased to benefit the stream (15.14.050.g.3.ii); the addition of provision 15.14.050.4 already allows the Administrator to increase the RMZ width in these areas.	(iv) Provide adequate pollution filtration functions. (v) Protect adjacent or downstream areas from erosion, landslides, or other hazards
305		15.14.060		Shrubsteppe Mitigation Program - The Mitigation Program Description19 contains an error in the paragraph that starts at bottom of p. 13 of and continues to p. 14: the text "The applicant would satisfy the obligation by purchasing those credits and providing verification to the County or city" occurs twice.	Delete duplicate sentence
306		15.14.060 (b)		For the Shrubsteppe mitigation program we suggested that: • The CAO cannot contain regulations that depend on a program that cannot be evaluated to determine whether it will result in no net loss of Shrubsteppe functions and values. References to the program should be removed from the CAO until the program is better defined and meets the Growth Management Act's (GMA) BAS requirements.36 The CAO should only state that there will be no net loss of shrubsteppe habitat function and values and the county has a compensatory mitigation program to assist in finding mitigation opportunities. • We are re-submitting this comment. The text of BCC 15.14.060(b) does not read as a development regulation and is unnecessary. If the County insists on retaining this section, here's a revision of the text that attempts to make the intent of the regulation clearer: • The County and cities in Benton County require mitigation to offset impacts from removal or degradation of shrubsteppe habitat when developed. When mitigation cannot be completely accomplished through mitigation sequencing avoidance and minimization and associated onsite actions then offsite, compensatory mitigation is required. Strike this paragraph. The CAO already states the required mitigation sequencing for the County in the general provisions. Furthermore, the County can't presume what other jurisdictions will require in their development regulations.	Made some minor tense changes in the referenced mitigation program text to better clarify how this requirement applies.
307		15.14.060 (b)		Shrubsteppe mitigation program - Retain the last paragraph, with minor edits: The program document should shall be periodically reviewed annually and updated to reflect the latest WDFW guidance, other best available science, program performance and adaptive management based in quantitative findings.	Update as suggested
308	Debbie Berkowitz	15.14.060 (b)		What is the avenue for public involvement in the mitigation program process? I did not see that there was anything mentioned about the public.	There are many ways to provide public input, including reviewing and commenting on annual report, citizen participation in Forterra (they plan to expand board membership to include Tri-Cities representatives), and by communicating directly with staff at the cities and County.
309		15.02.070 (52)		Practical alternative – definition. This is much improved but should also include a statement about no net loss of ecological functions and values. E.g., "A practical alternative is one that avoids impacts to critical areas and their buffers where possible and, where avoidance is not possible, minimizes impacts to the greatest extent practicable. Please add – "and provides compensatory mitigation if avoidance or minimization results in net loss of ecological functions or values."	Update as suggested
310		15.02.070 (56)(i)		Qualified consultant. A person with a general biology degree does not necessarily have knowledge in a critical are topic like FWHCAs. E.g., a general biology degree may have an emphasis in molecular biology or virology with no experience in fish, wildlife, or habitats. The definition given in 15.02.070 also doesn't specify any length of professional experience required as an alternative to	See response to Comment #297

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				a degree. The definition of a qualified professional for wetlands in definition #58(iv) is significantly more stringent than that for a FWHCA.	
311		15.02.220(g)		Permanent site protection and monitoring. I am concerned that plans do not call for permanent site protection and monitoring for all mitigation properties. As part of a site development process, habitat has been destroyed for the development and that destruction is mitigated either onsite or offsite with site monitoring until the restoration is successful. If monitoring is for a period that just includes the initial success of the restoration period, how does one ensure that the mitigation is permanent and that there's no further loss of ecological functions and values in the long term? Ten years from now, the development will still be there, but the habitat that was protected by mitigation would no longer be monitored or protected and could be destroyed, resulting in a net loss of habitat function. Establishing a conservation easement for all mitigation properties would allow a land trust to take over the monitoring and restoration processes in perpetuity once the initial restoration has succeeded.	Updated text in this paragraph to read: "The County requires permanent protection (through conservation easement or deed restriction) for mitigation areas both onsite and offsite, including those onsite areas that are still held by the landowner."
312		15.02.260		Response comment 155 – "In instances where critical areas are impacted outside of a permit process, the County's Code Enforcement requirements would be implemented." Most of these critical areas' ordinance issues aren't something for which Code Enforcement typically has expertise. Based on my experience in Richland, the issues wind up with Planning Department staff. Going directly to Planning Department staff also makes enforcement more timely – which is important is somebody is disturbing a critical area.	Reaching out to either County Planning staff or code enforcement staff is effective, as they work closely together. Code enforcement staff are the ones who directly respond to the landowner.
313				Regarding Comment 129 - Where is this comment added in 15.02.210c? And in 15.02.130? I can't find it	Added to 15.02.130 (2), "If an activity goes beyond the authorized scope of approved work, restoration should be required to restore function of a critical area."
314		15.02.160		Aren't activities (h), (i), (j), and (k) also allowed? Shouldn't they continue the numbering of (c) 8,9,10,11?	Yes, that is correct. Updated formatting to be clearer, using numbering instead of letters.
315		15.02.240(a)(7)		Did you mean to "discuss the spatial habitat context for shrubsteppe for the subject and surrounding properties''? What does this include?	Updated to reference the critical area report to: "should discuss…"
316		15.02.240(a)(7)		Review Criteria - "This is really more specific to the situation and often consultation is not required…" Please consider changing 'may' to 'should' (rather than 'shall'). This would allow more tailored implementation. The statement as written doesn't exclude other agencies as 'or other appropriate agency' is already stated.	Update as suggested
317		15.14.040 (c)(4)		Appreciate your response [to adding table similar to that in wetlands for impact minimization and mitigation measures], but I don't think it addressed issues like light and noise which are addressed in Table 15.04.040-2.	Updated to include the following statement at the end of item 4 paragraph: "impacts from light and noise and other related factors, as applicable."
318		15.14.050 (g)(3)(5)		Is section 15.14.050 (g)(5) also applicable to (3) (RMZ averaging)? 15.14.050 (g)(4) seems to include (g)(5) [(g)(4) seems to call for a list, but here is not list until (g)(5)], but it's not clear that it includes (g)(3).	Added a new FWHCA section that reads: "1) Establishment of Buffers. Buffers often consist of an undisturbed area of native vegetation or areas identified for restoration established to protect the integrity, all key habitat functions, and values of the affected habitat. Required buffers reflect the sensitivity of the habitat and the type and intensity of human activity proposed to be conducted nearby and shall be protected consistent with the management recommendations issued by the Washington State Department of Fish and

Comment No.	Commenter	Section No.	Page No.	Comment	Response
					Wildlife and documented local conditions in critical areas reports or other local studies that characterize existing conditions, as applicable." Also broadened (h) to address both FWHCA buffers and RMZs, as applicable.
319		15.14.050 (g)(h)		This addition is still under section (g) RMZs, so is tied to riparian zones. My original comment was meant to include buffers for other FWHCAs that aren't tied to riparian zones.	See response to Comment 318