Draft Memorandum

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

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

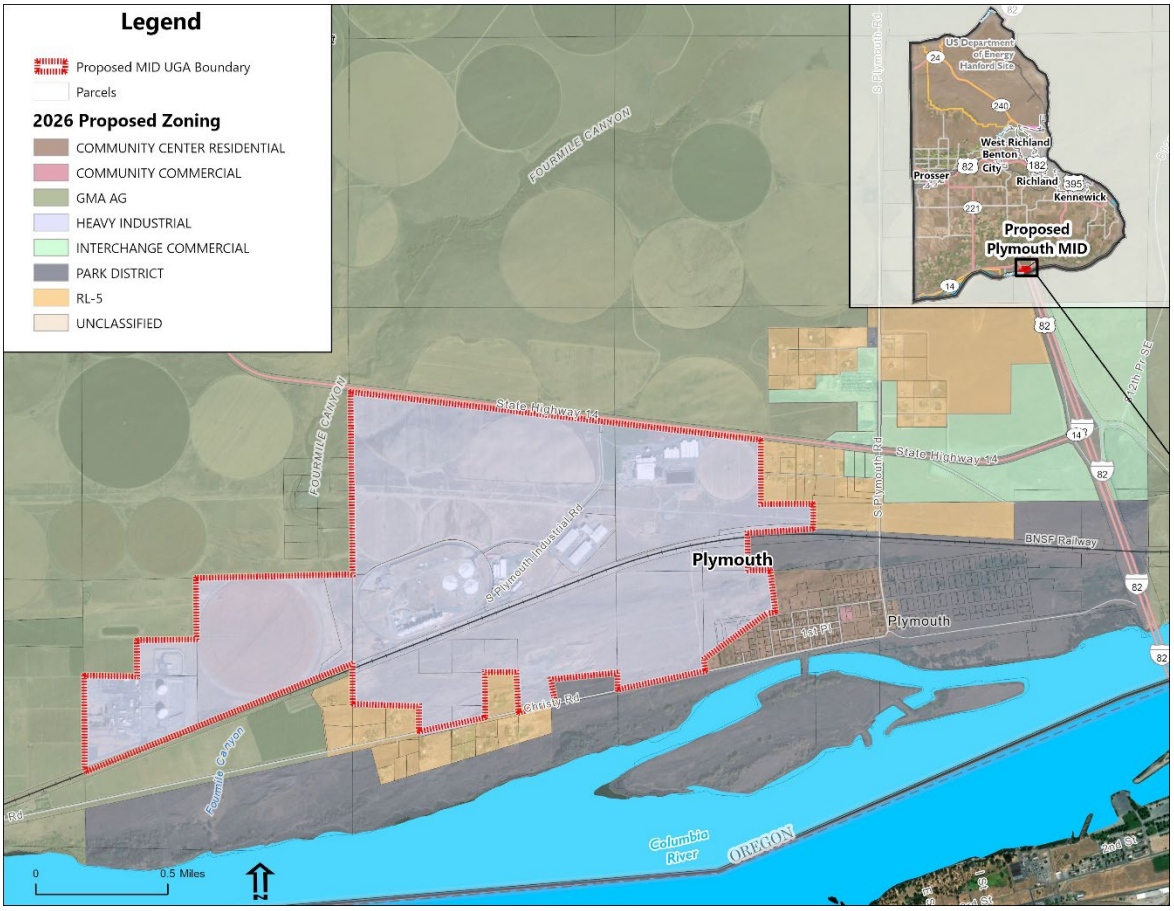
Date: September 9, 2026

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

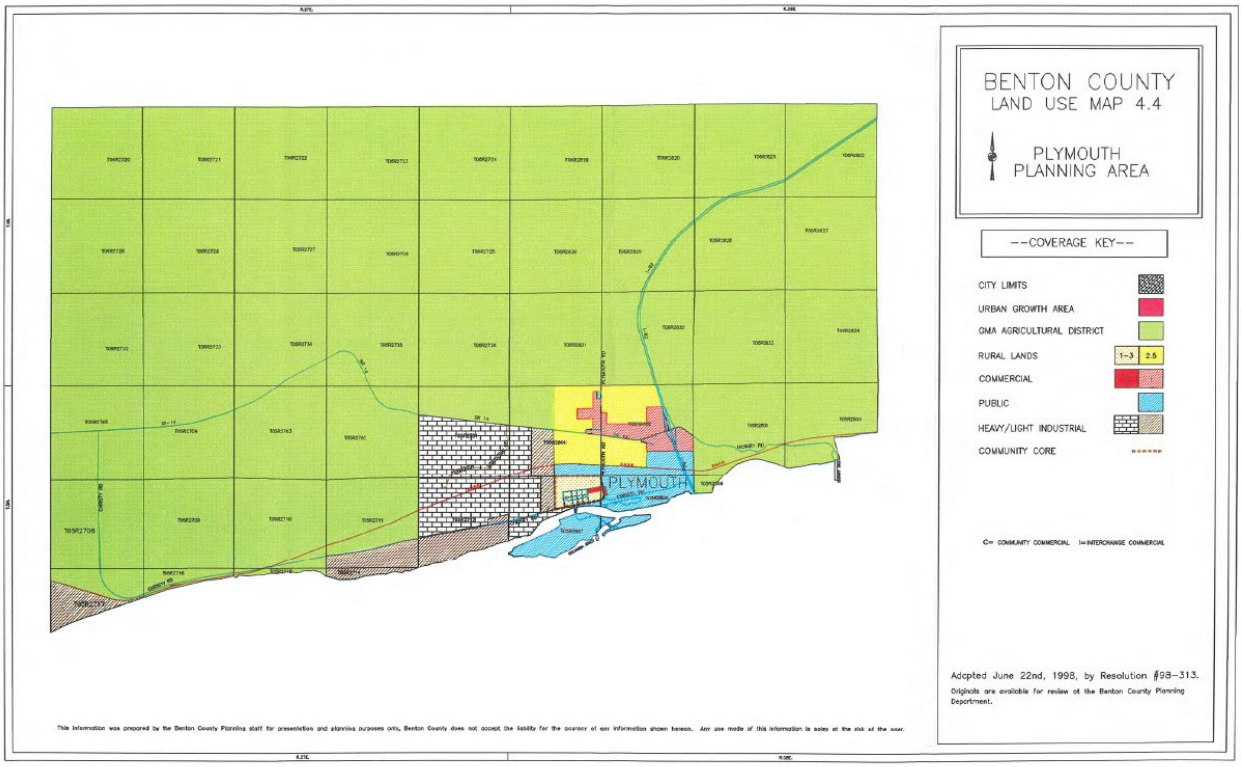


The Industrial Lands Inventory Memorandum evaluated the overall supply and distribution of industrially designated lands within Benton County and the broader region and led to the MID identification for Plymouth and adding more industrial lands (with some removals as well) in this part of the County. 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.



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

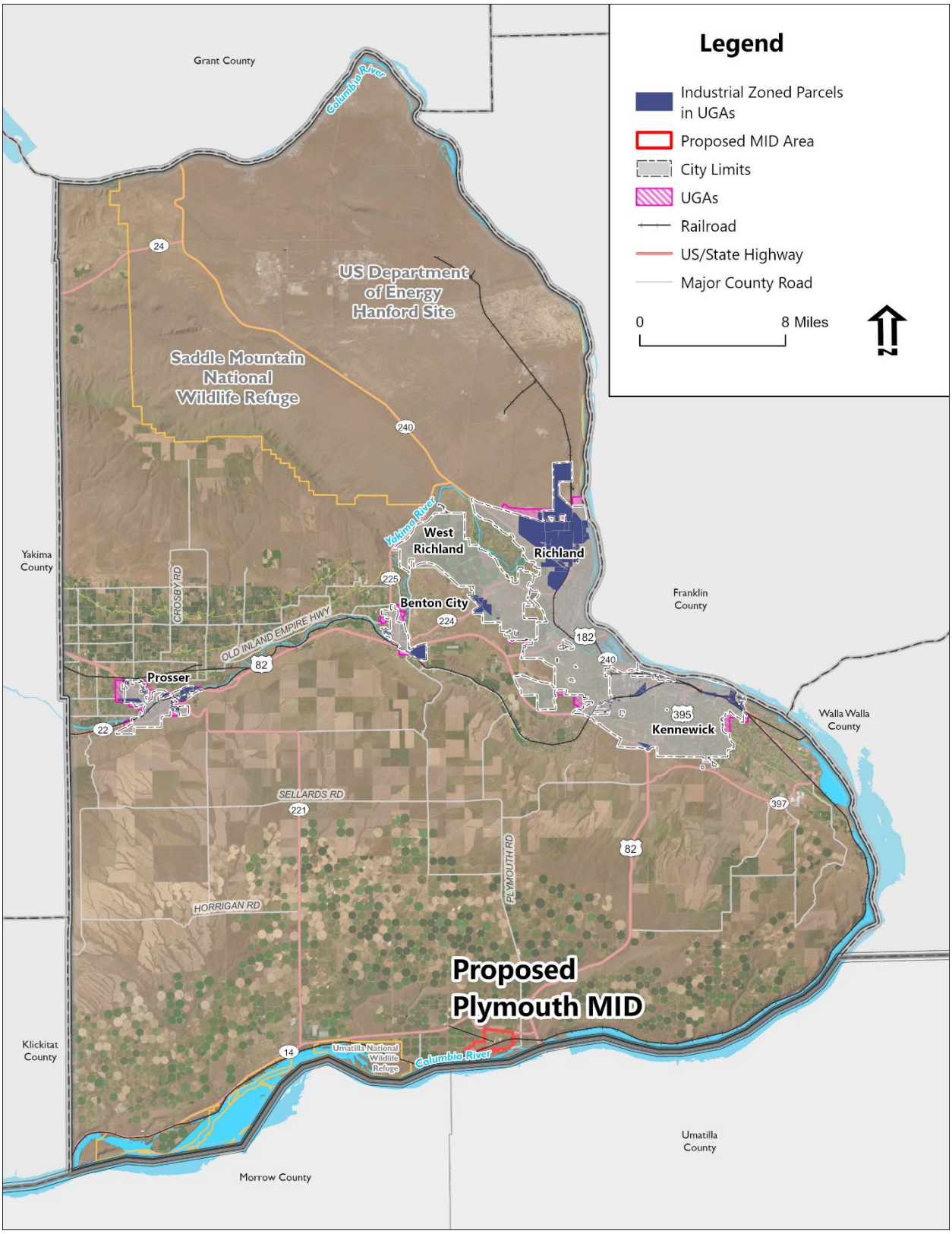


Table 1: MID Industrial Lands Comparison Summary

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

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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.

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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

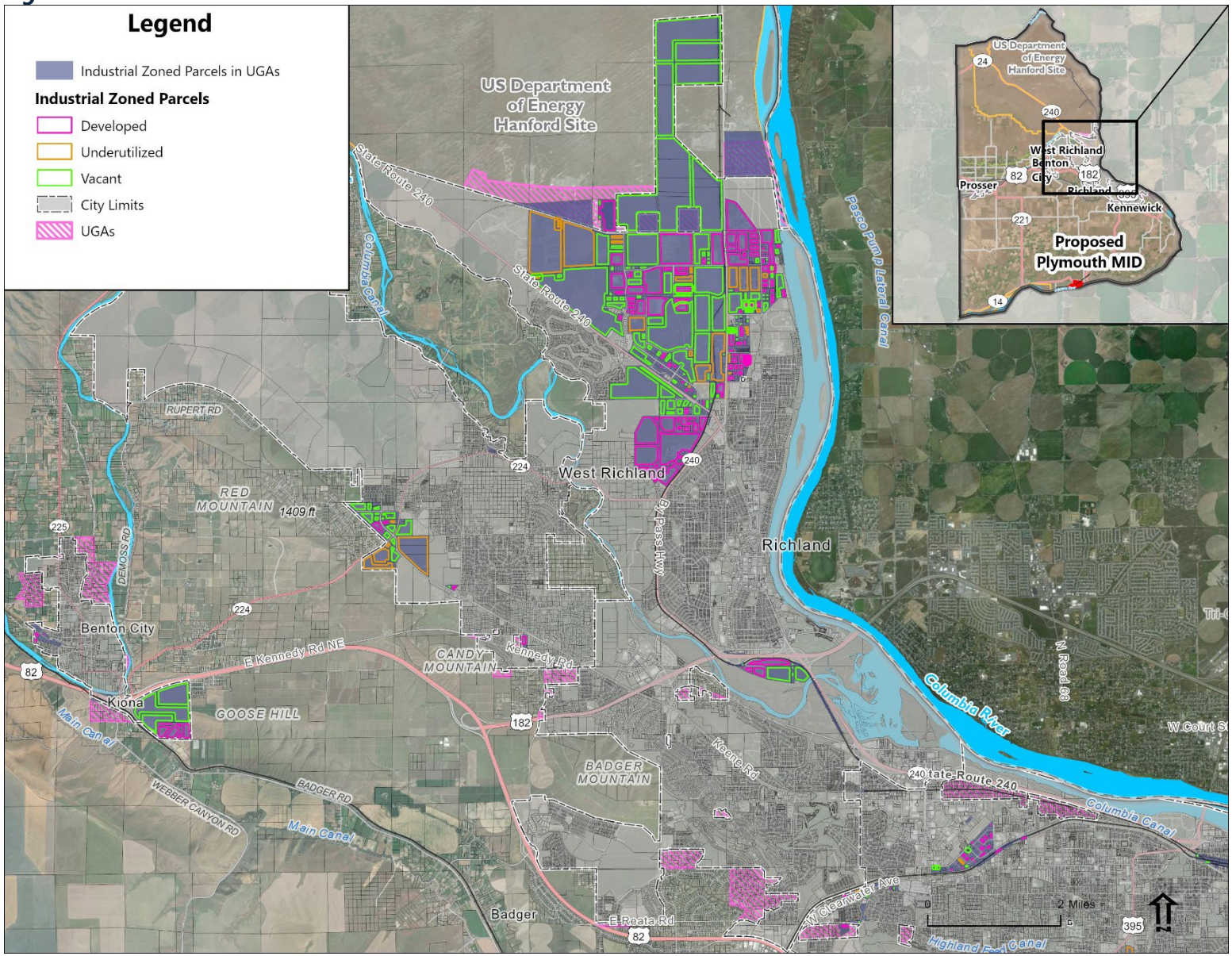


Figure A- 2: Kennewick Industrial Lands

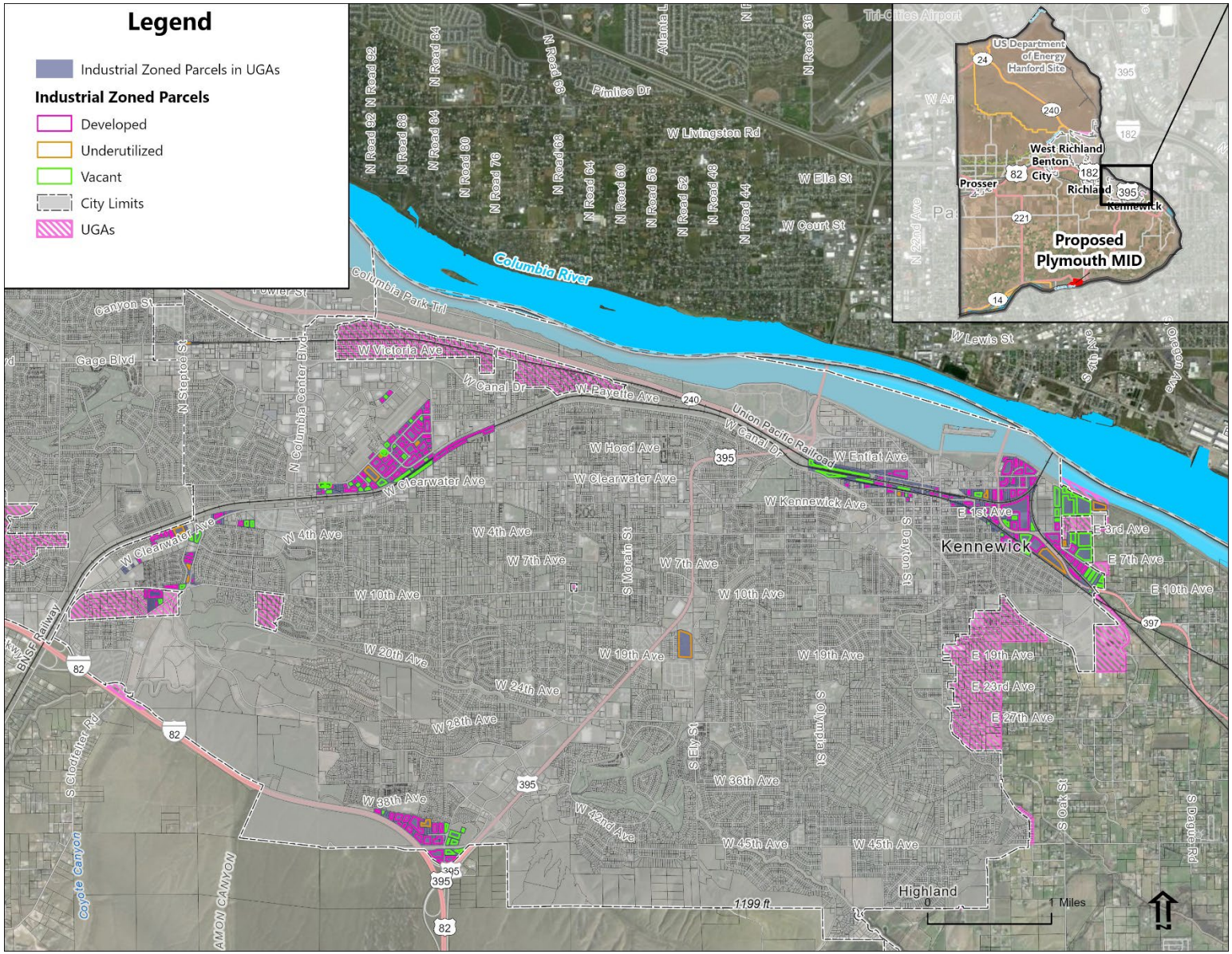


Figure A- 3: West Richland Industrial Lands

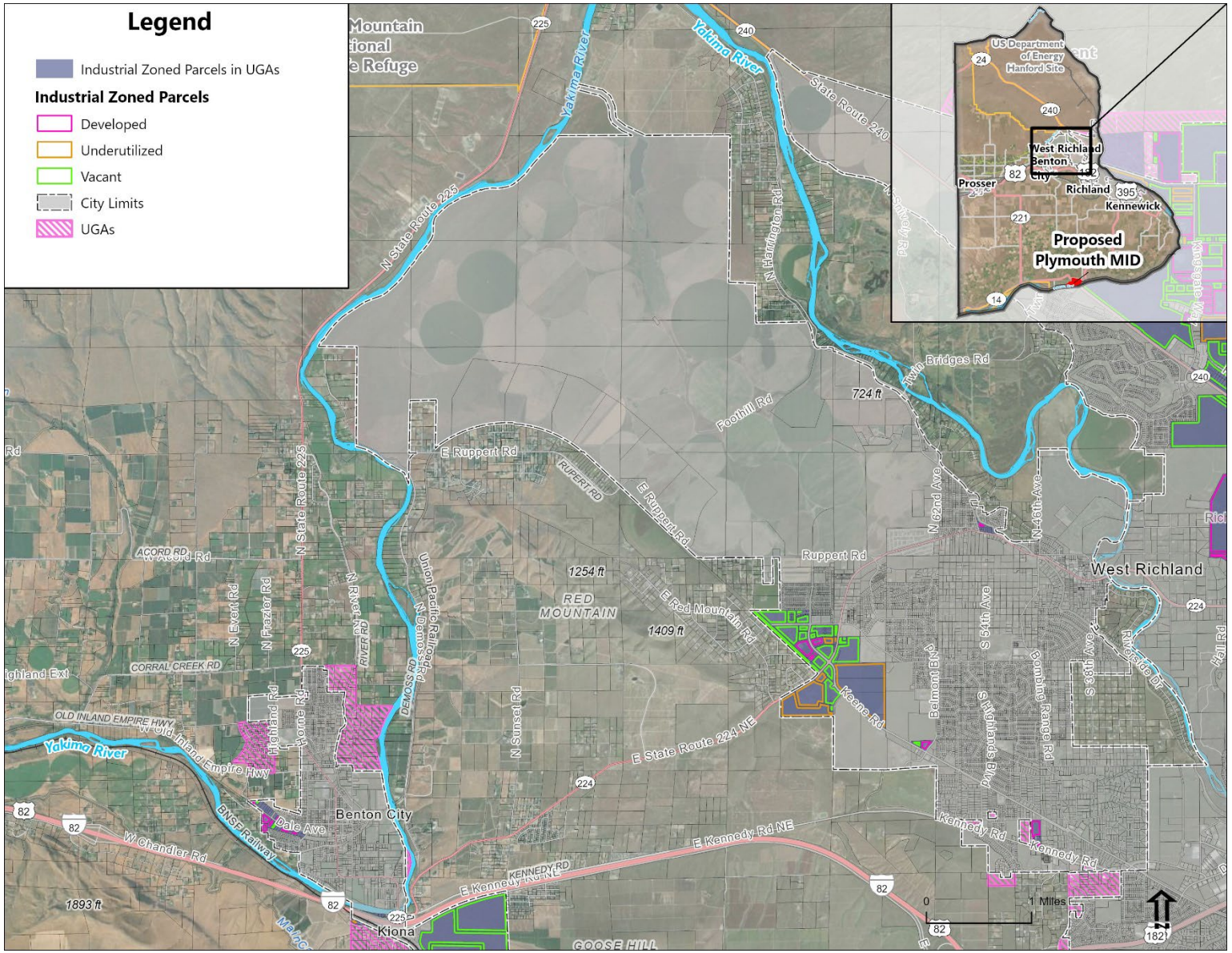


Figure A- 4: Benton City Industrial Lands

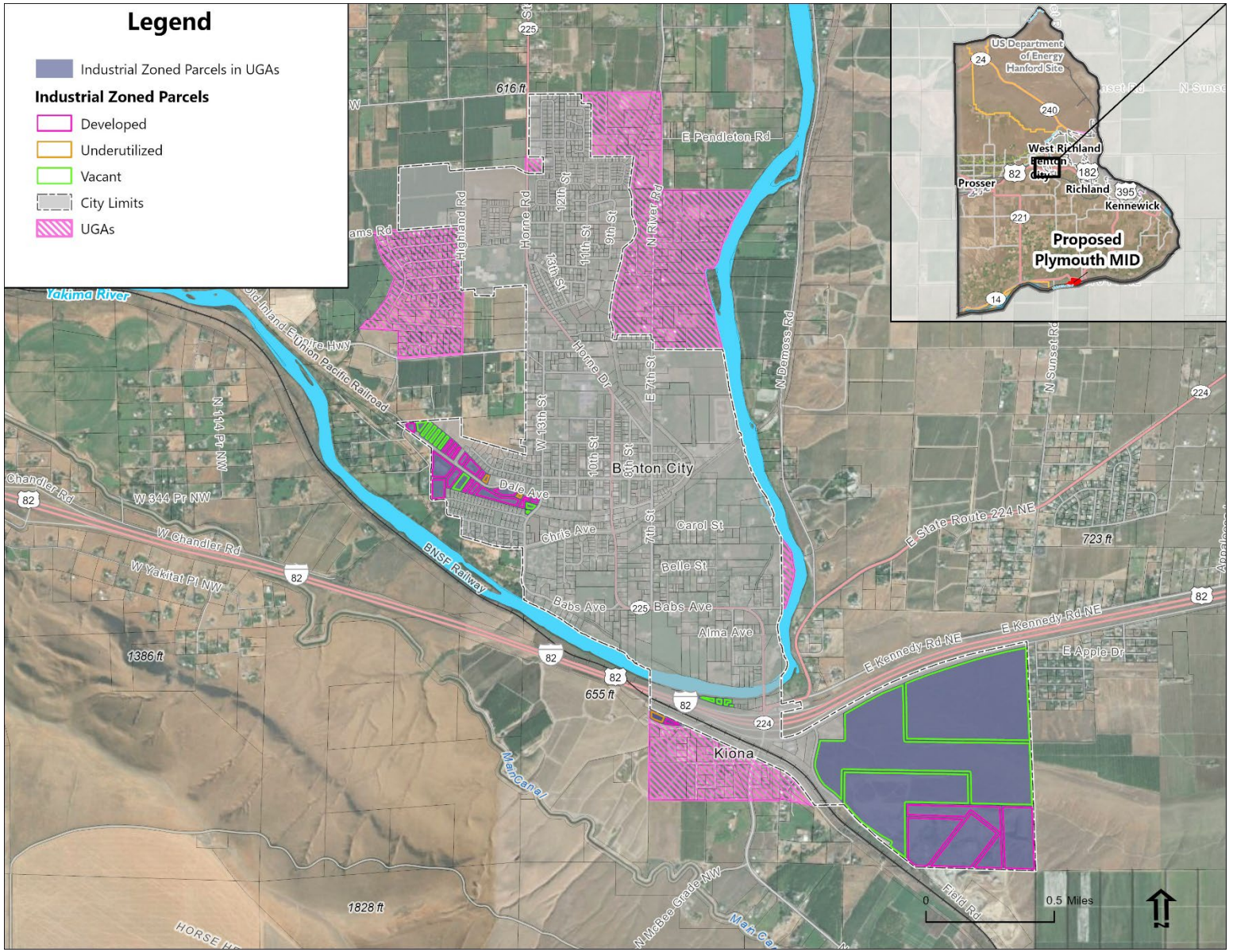


Figure A- 5: Prosser Industrial Lands

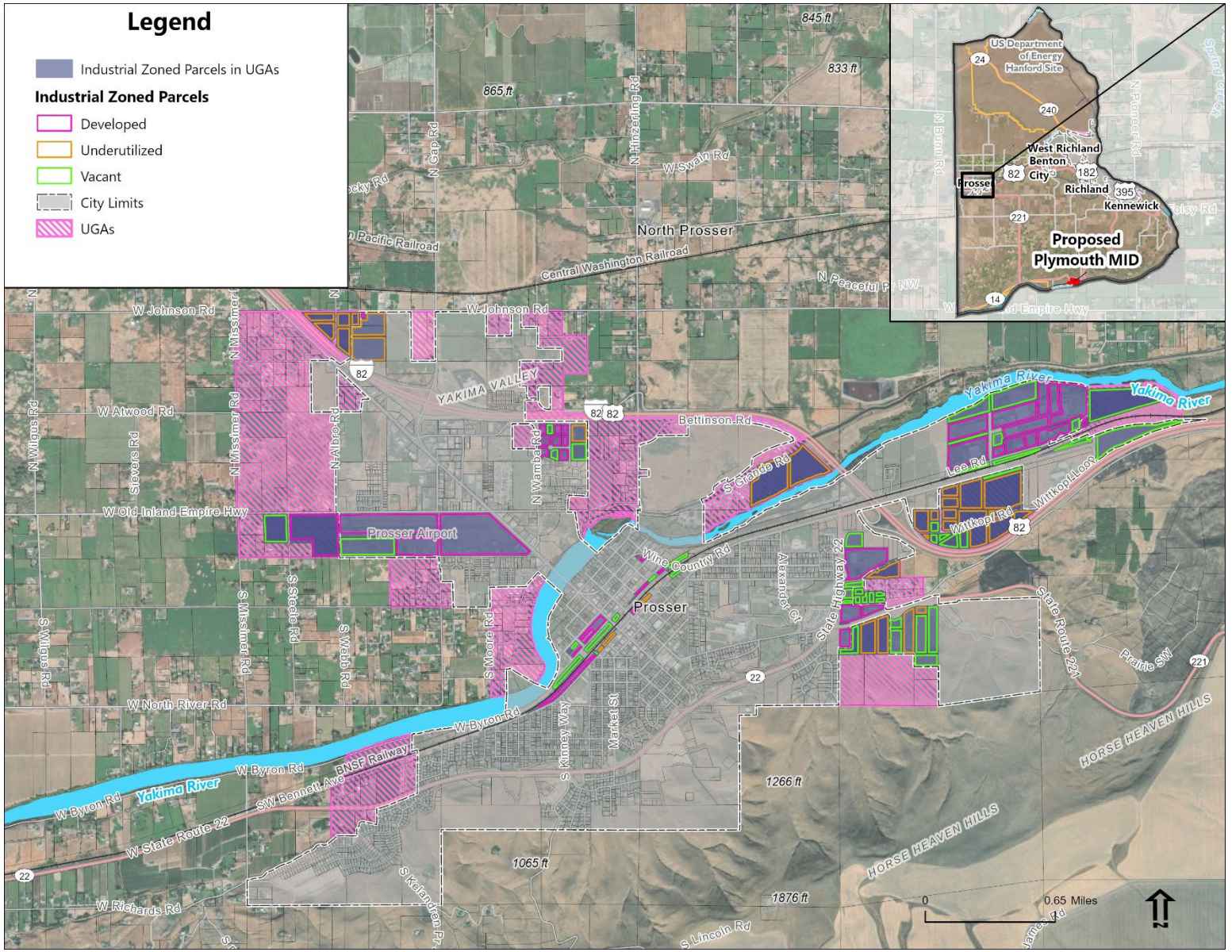


Table A-1: Largest 3 Industrial Land Ownership Areas by Jurisdiction

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

Washington State Department of Commerce

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THANK YOU

We have received your amendment submission. Please allow 1-3 business days for review. Please keep the Submittal ID as your receipt and for any future questions. We will also send an email receipt to all contacts listed in the submittal.

Submittal ID: 2026-S-12837

Submittal Date Time: 05/20/2026

Submittal Information

Jurisdiction	Benton County
Submittal Type	60-day Notice of Intent to Adopt Amendment
Amendment Type	Combined Comprehensive Plan and Development Regulation Amendment

Amendment Information

Brief Description
Proposed 2026 Comprehensive Plan Periodic Update and proposed development regulations updates to implement the updated Comprehensive Plan.

- **Yes, this is a part of the 10-year periodic update schedule, required under RCW 36.70A.130.**
- **Yes, this is action includes changes to Urban Growth Boundaries.**

Planning Commissions Date 08/18/2026

Board of County Commissioners Date 09/08/2026
Board of County Commissioners Date 09/22/2026

Anticipated/Proposed Date of Adoption 09/22/2026

Categories

Submittal Category
Capital Facilities
Climate
Comprehensive Plan
Conservation Element
Critical Areas Ordinance
Development Regulations
Environment

Essential Public Facilities
Housing
Land Use
Open Space
Parks and Recreation Element
Public Participation
Resource Lands
Rural Lands
Transportation
Utilities

Attachments

Attachment Type	File Name	Upload Date
Combined Comp Plan and Dev Reg Amend - Draft	2026_05_19 60 Day Notice_signed.pdf	05/19/2026 03:59 PM
Combined Comp Plan and Dev Reg Amend - Draft	2026 County Wide Planning Policies Updated.pdf	05/19/2026 03:59 PM
Combined Comp Plan and Dev Reg Amend - Draft	2026_04_21_Draft CH 15.18 RWSP.pdf	05/19/2026 04:00 PM
Combined Comp Plan and Dev Reg Amend - Draft	2026_04_21_Draft CH 17.10 Permit Review Process.pdf	05/19/2026 04:00 PM
Combined Comp Plan and Dev Reg Amend - Draft	2026_04_21_Draft Title 9 Subdivisions Combined.pdf	05/19/2026 04:00 PM
Combined Comp Plan and Dev Reg Amend - Draft	2026_04_21_Draft Title 11 Zoning Combined.pdf	05/19/2026 04:00 PM
Combined Comp Plan and Dev Reg Amend - Draft	D15_D16 Draft Comprehensive Plan Elements.pdf	05/19/2026 04:01 PM
Combined Comp Plan and Dev Reg Amend - Draft	D18 Draft Critical Areas Code and Flood Damage Prevention Code.pdf	05/19/2026 04:01 PM
Combined Comp Plan and Dev Reg Amend - Draft	D21 Draft EIS.pdf	05/19/2026 04:02 PM
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Combined Comp Plan and Dev Reg Amend - Draft	D 17_D19_D20 Draft Comprehensive Plan Techncial AppendicesPart-6.pdf	05/20/2026 10:13 AM

Contact Information

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First Name Greg
Last Name Wendt
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☐ **Yes, I would like to be contacted for Technical Assistance.**

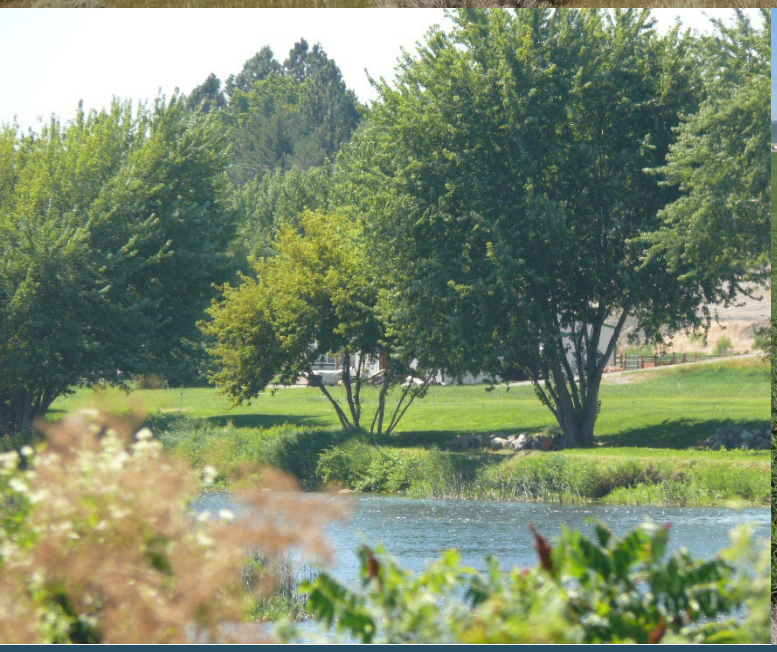
Certification

■ **I certify that I am authorized to submit this Amendment for the Jurisdiction identified in this Submittal and all information provided is true and accurate to the best of my knowledge.**

Full Name	Brittany Lee Merrill
Email	Brittany.Merrill@co.benton.wa.us

PCM 1.11







May, 13 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** **JUB**

Draft: May 13, 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 F Agricultural Lands Reclassification Memorandum (2018)

Appendix G Addendum to Agricultural Lands Reclassification Memorandum (2025)

Appendix H-1 Transportation Level of Service

Appendix H-2 Washington State Highway Inventory Within Benton County

Appendix H-3 Washington State Highway Build-Out of Benton County Comprehensive Land Use Assumptions – 2028 AADT

Appendix I Industrial Lands Inventory Memorandum

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Appendix K Key Findings from Agri-Tourism Meeting

Appendix L Benton County Shrubsteppe and Wetland Prioritization Memorandum

Appendix M Open Space Corridors Memorandum

Appendix N Draft Shrubsteppe Mitigation Program Description

Appendix O Wildland Urban Interface Memorandum

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Introduction to Volume II

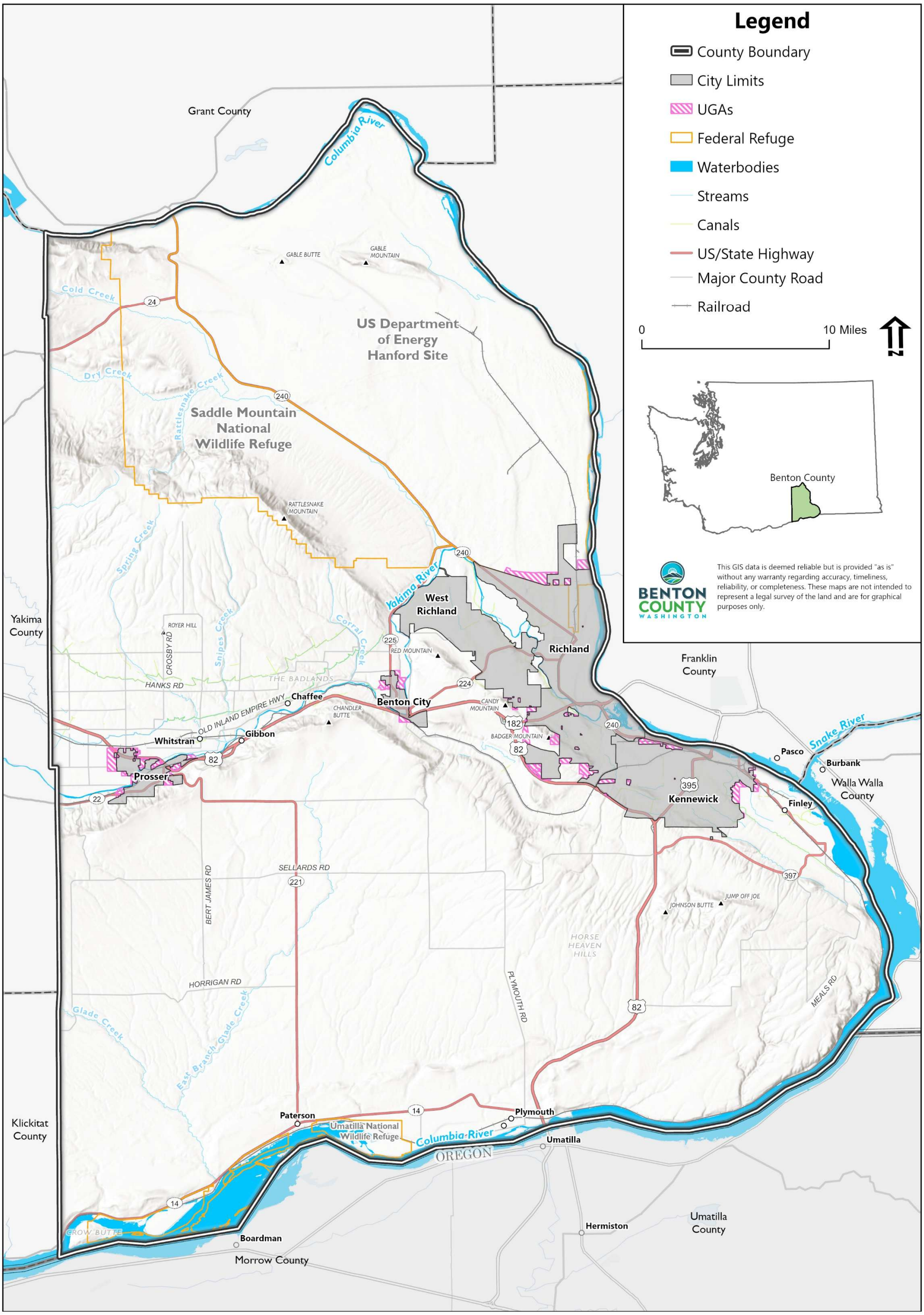
Volume II provides technical appendices that support the Benton County Comprehensive Plan (Plan). It includes the background data, methods, and documentation used to develop updated goals and policies and Plan elements in Volume I and to meet Growth Management Act (GMA) requirements.

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



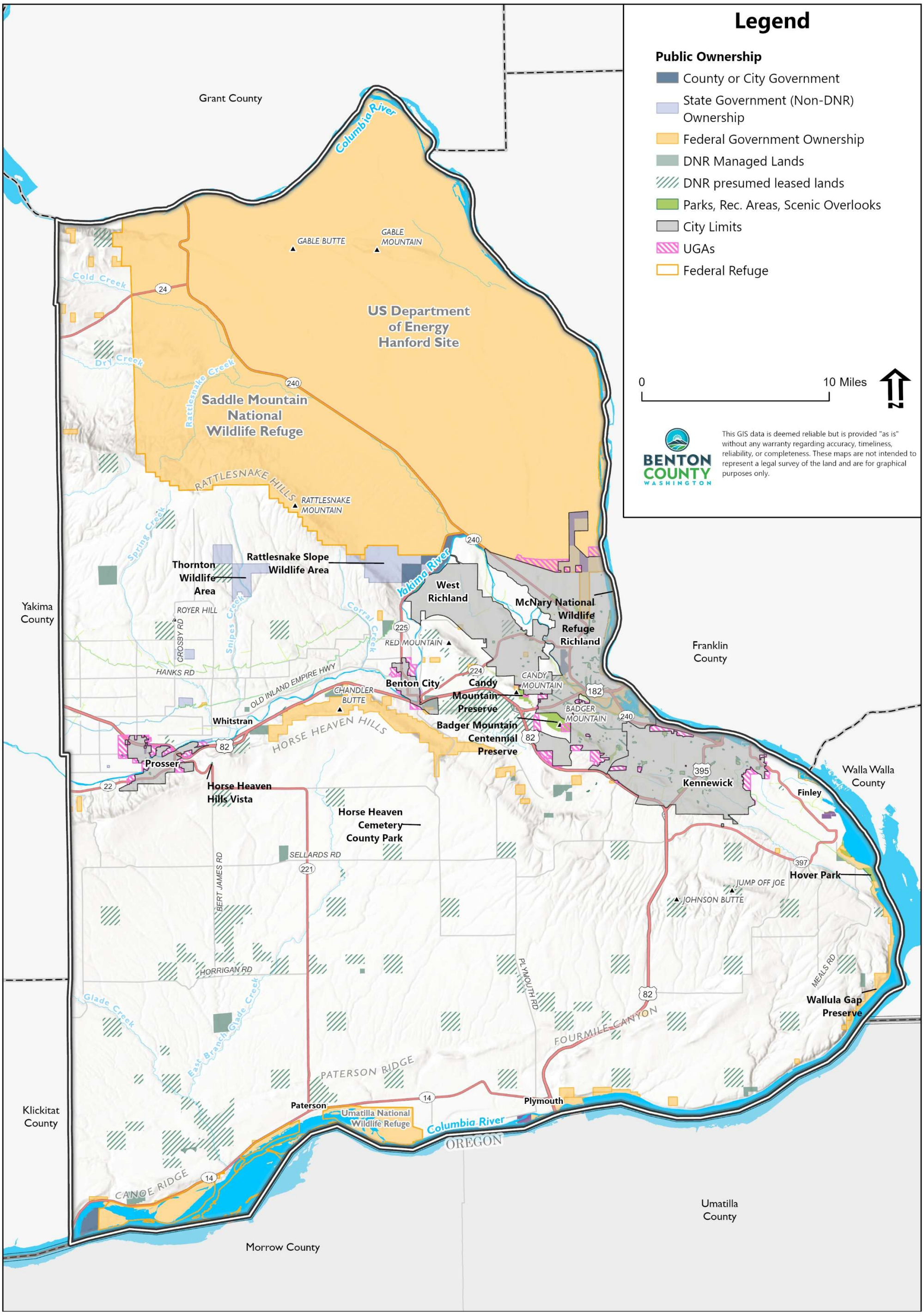
Data Sources: USDA SSURGO, FEMA, Benton County GIS, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), National Ocean

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Figure 1

General Overview Map

Benton County Comprehensive Plan



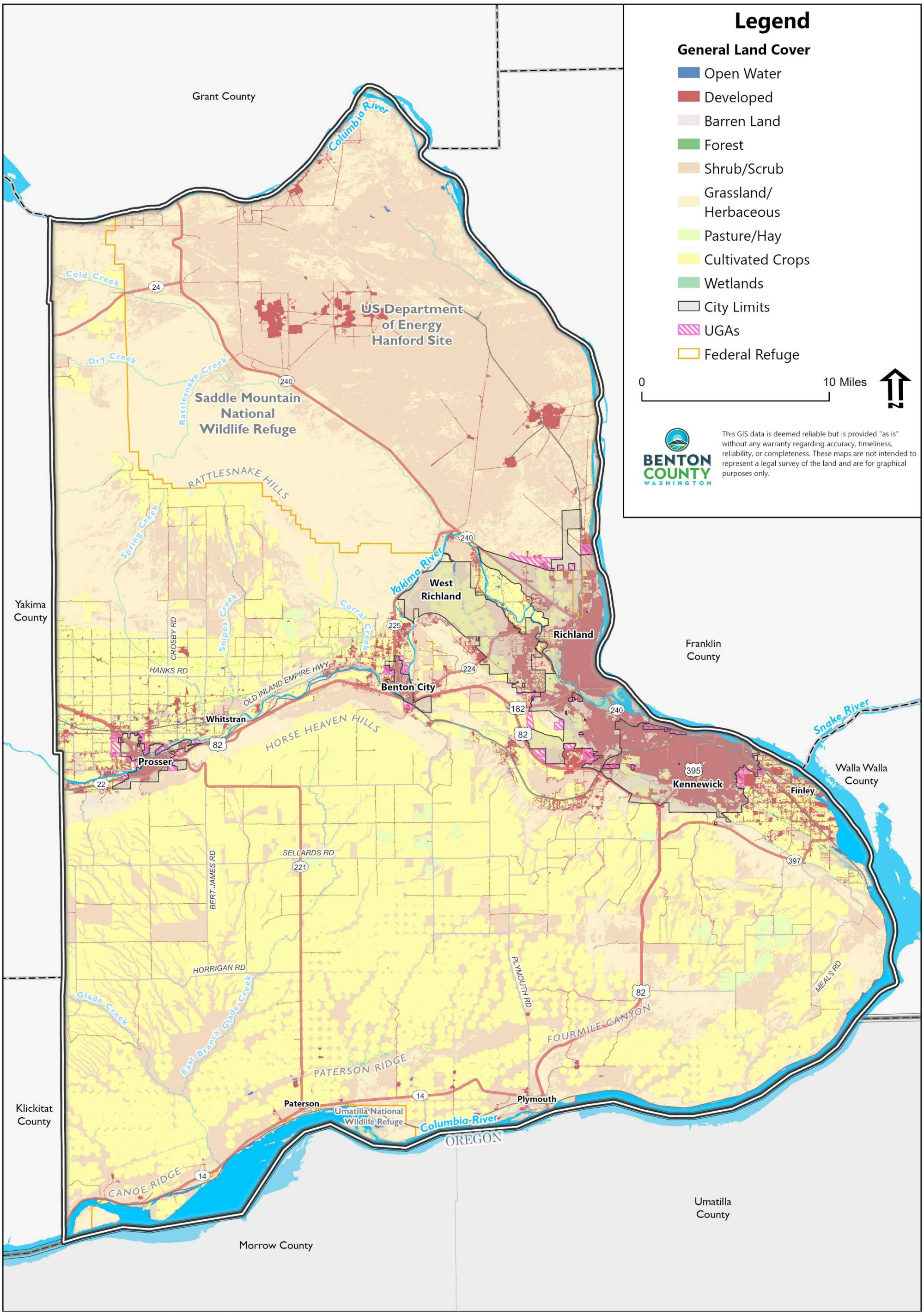
Data Sources: USDA SSURGO, FEMA, Benton County GIS, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), National Ocean

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Figure 2

Public Land and Parks Map

Benton County Comprehensive Plan



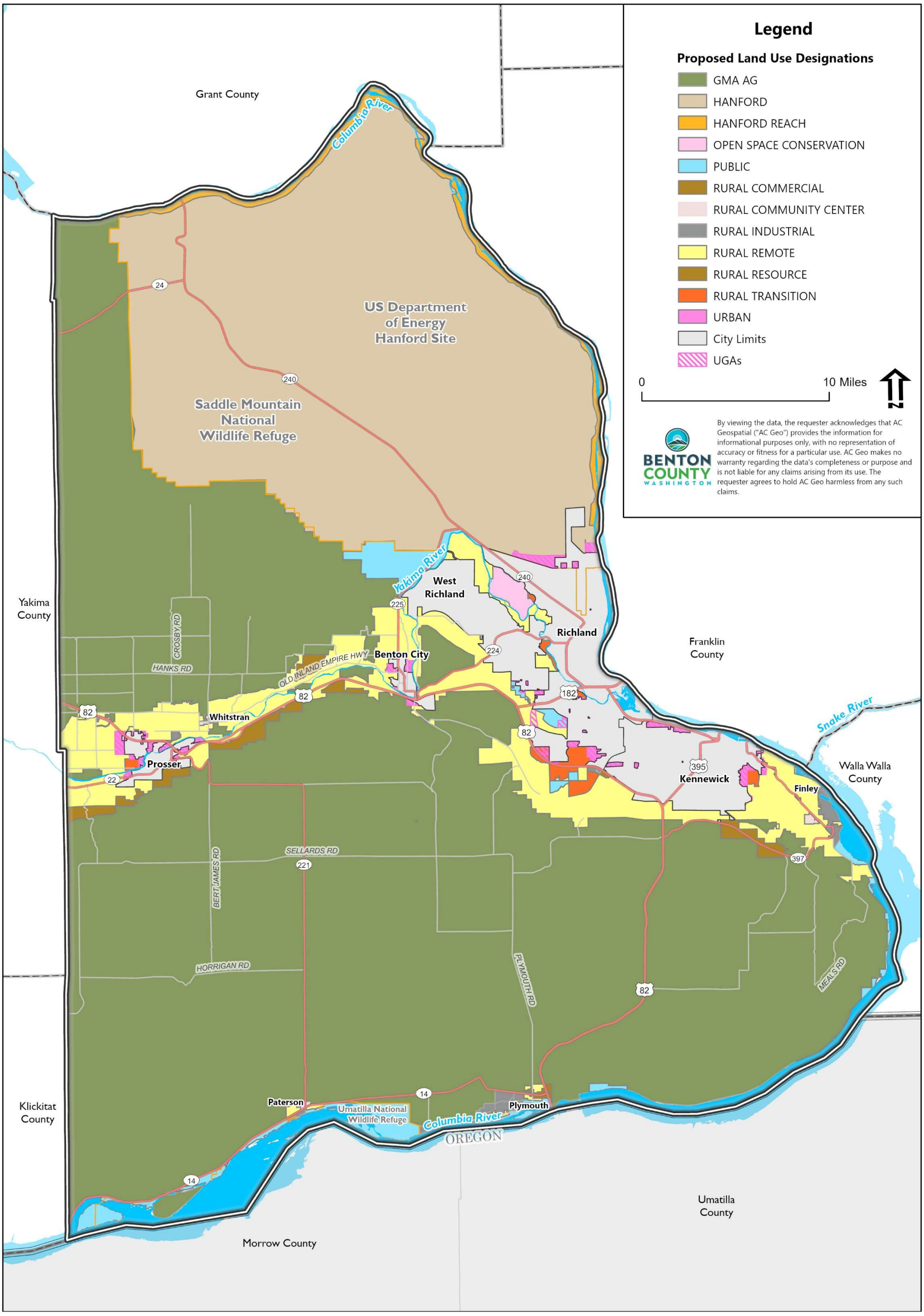
Data Sources: MRLC National Landcover Database, FEMA, Benton County GIS, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), National Ocean Service (NOS),

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Figure 3

General Land Cover Map

Benton County Comprehensive Plan



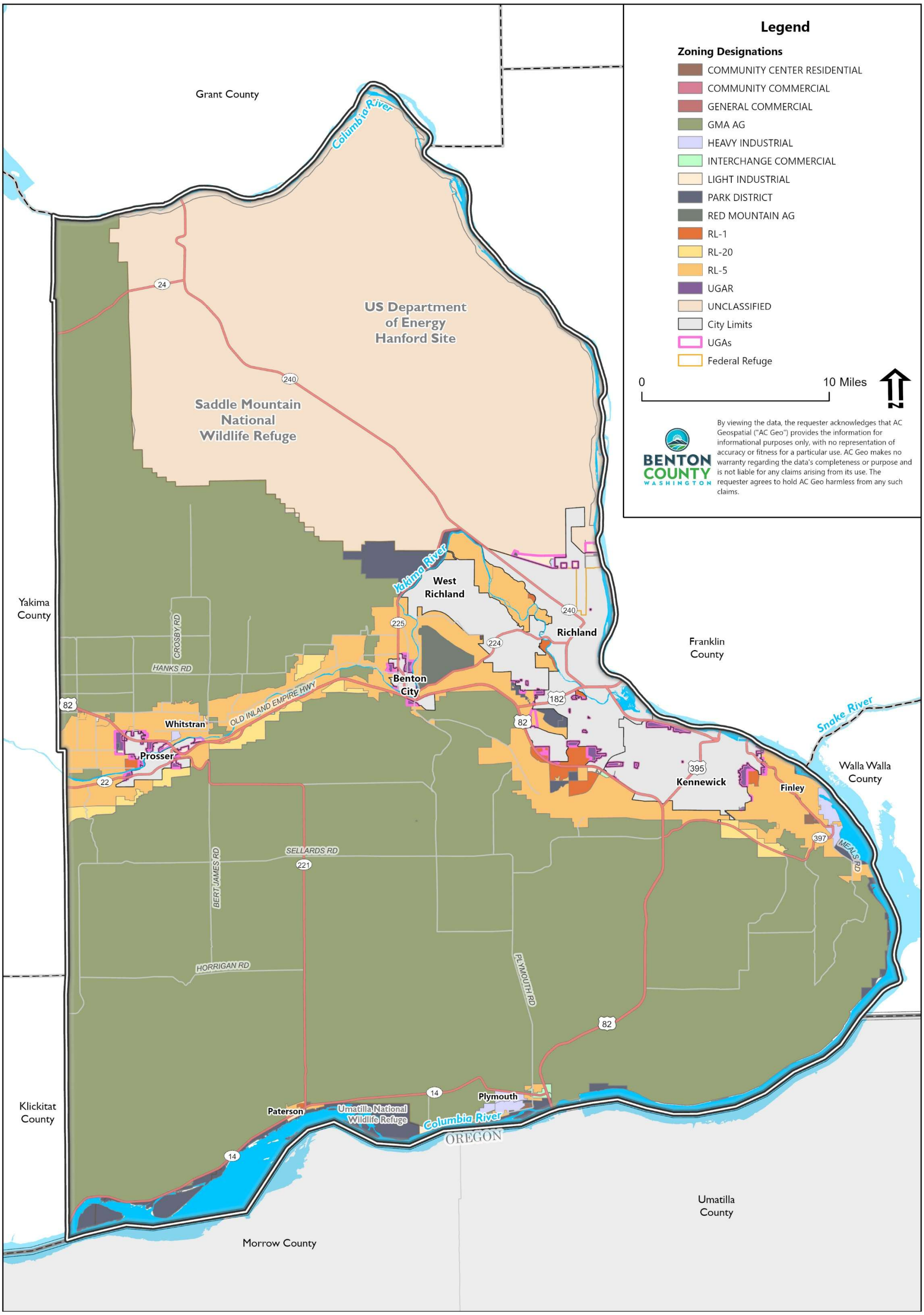
Data Sources: Benton County GIS, Washington Department of Transportation, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau;

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Figure 4

Proposed Land Use Designations Map

Benton County Comprehensive Plan



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

Date of Last Export: 4/30/2026 9:50 AM

Figure 5

Proposed Zoning Map

Benton County Comprehensive Plan

Legend

Inches Per Year (PRISM 30-Year Average)

- 7- 8
- 8 - 9
- 9- 10
- 10 - 11
- 11 - 12
- 12 - 13
- 13 - 14
- City Limits
- UGAs
- Federal Refuge

0 — 10 Miles

N

BENTON COUNTY WASHINGTON

This GIS data is deemed reliable but is provided "as is" without any warranty regarding accuracy, timeliness, reliability, or completeness. These maps are not intended to represent a legal survey of the land and are for graphical purposes only.

Grant County
Columbia River
Cold Creek
24
Dry Creek
Rattlesnake Creek
240
US Department of Energy Hanford Site
Saddle Mountain National Wildlife Refuge
Spring Creek
Yakima River
West Richland
Richland
225
Yakima County
CROSBY RD
Snipes Creek
Corral Creek
Franklin County
HANKS RD
OLD INLAND EMPIRE HWY
224
Benton City
182
240
Whitstran
82
Snake River
Prosser
22
395
Kennewick
Finley
Walla Walla County
SELLARDS RD
221
BERT JAMES RD
397
HORRIGAN RD
PLYMOUTH RD
82
MEALS RD
Glade Creek
East Branch Glade Creek
Klickitat County
Paterson
14
Plymouth
Umatilla National Wildlife Refuge
Columbia River
OREGON
14
Umatilla County
Morrow County

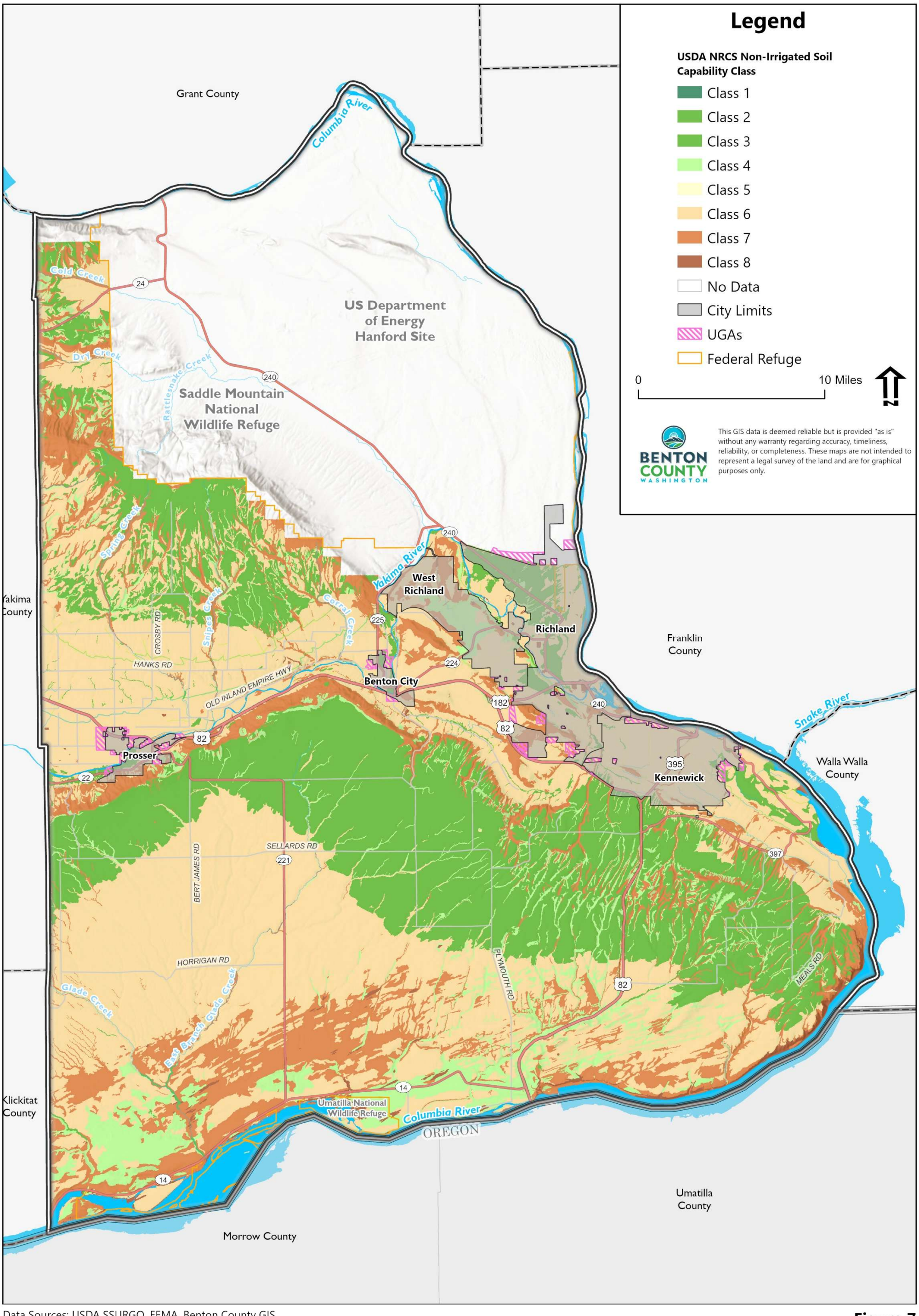
Data Sources: USDA SSURGO, FEMA, Benton County GIS, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), National Ocean

Date of Last Export: 6/13/2025 8:00 AM

Figure 6

Average Annual Precipitation Map

Benton County Comprehensive Plan



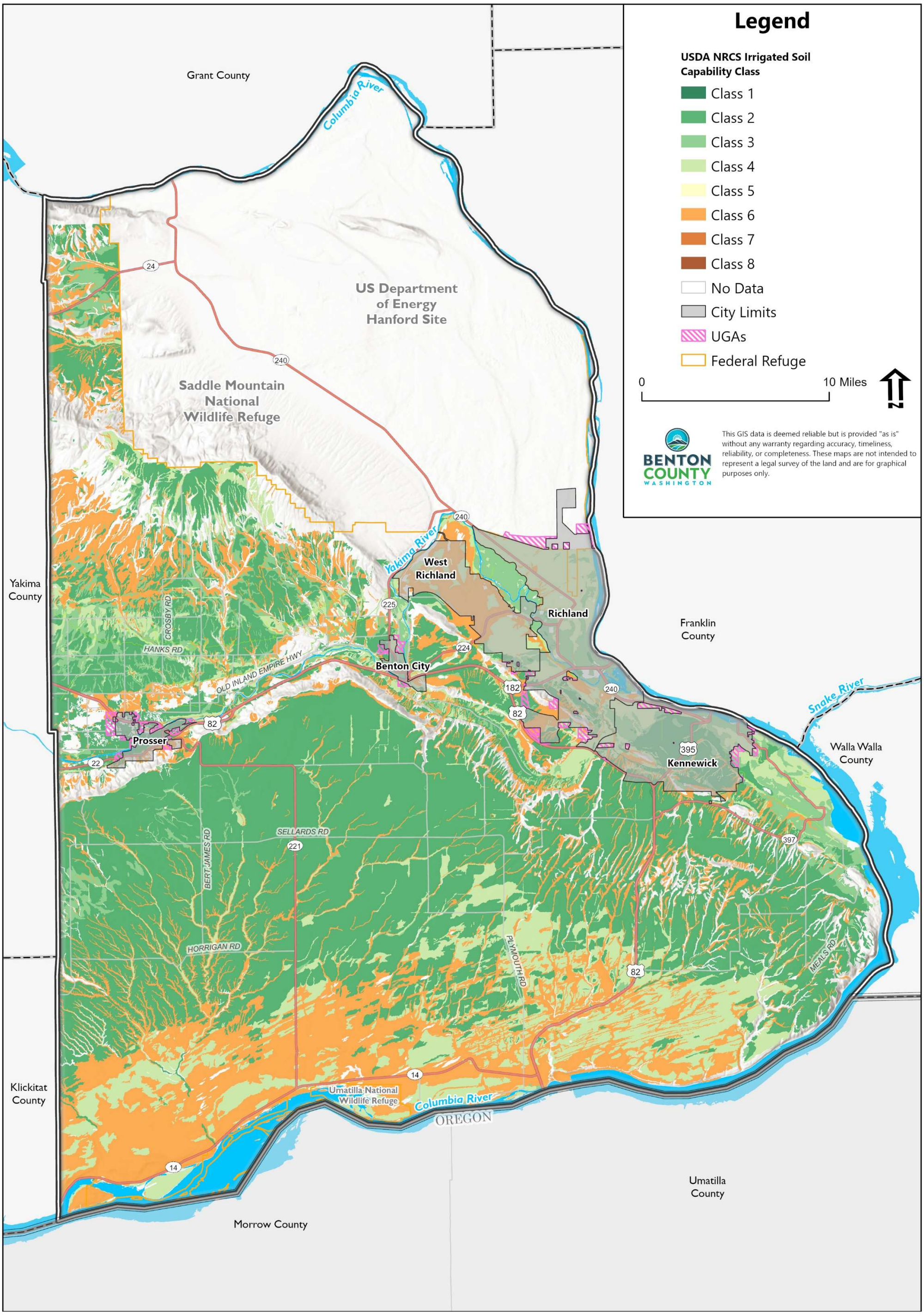
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Figure 7

Non-Irrigated Soil Capability Classification Map

Benton County Comprehensive Plan



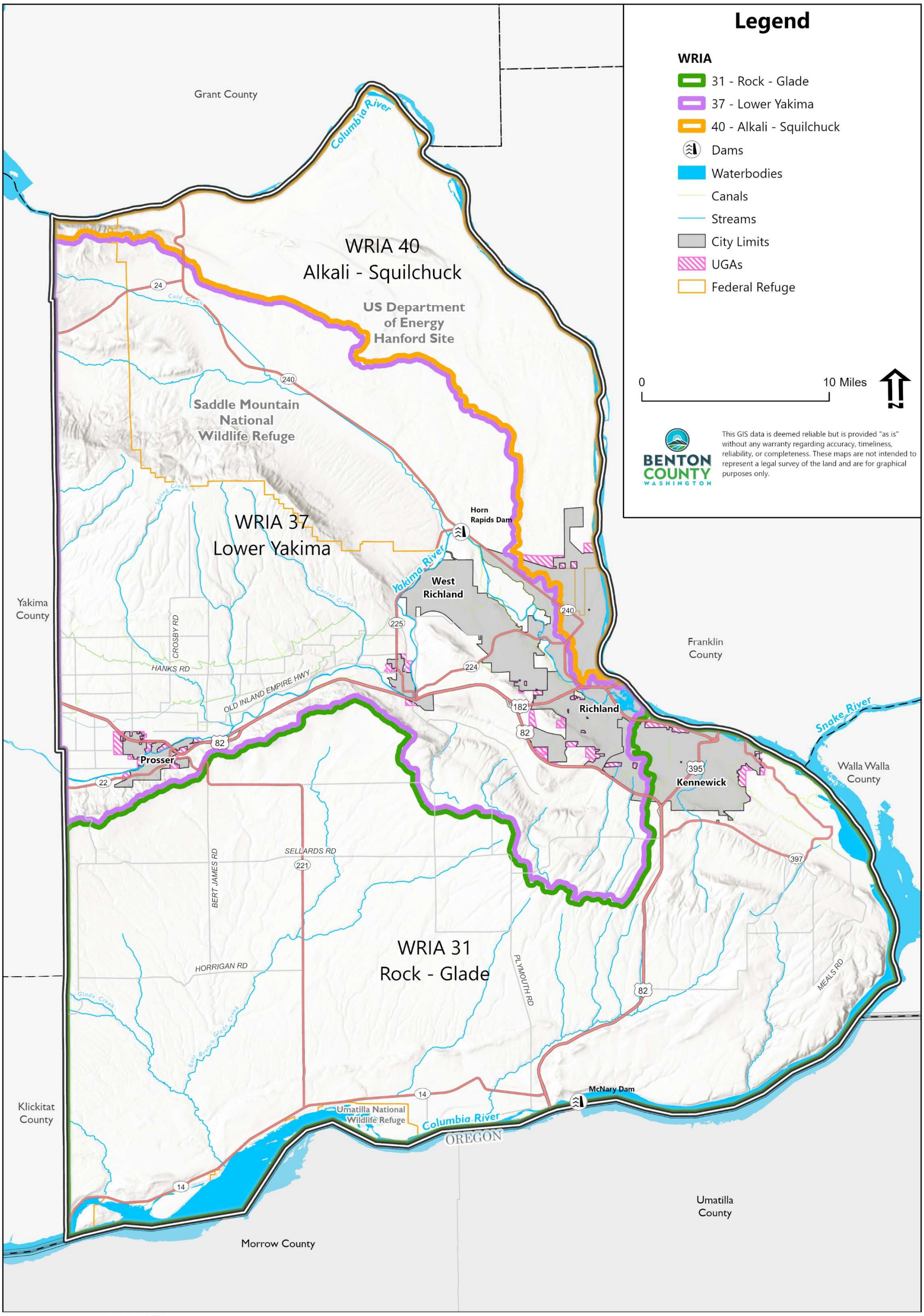
Data Sources: USDA SSURGO, FEMA, Benton County GIS, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), National Ocean

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Figure 8

Irrigated Soil Capability Classification Map

Benton County Comprehensive Plan



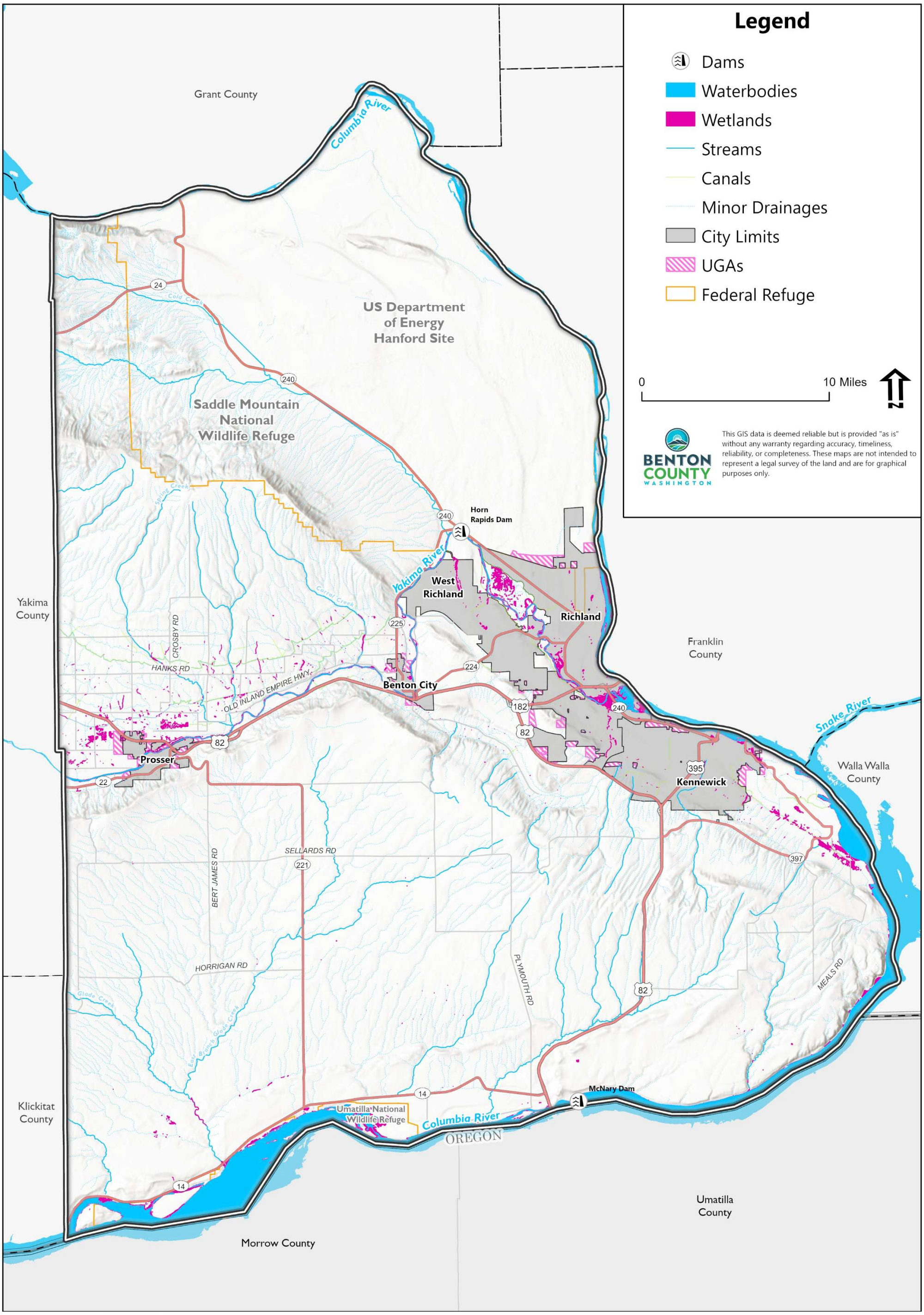
Data Sources: US Fish and Wildlife Service NWI, Benton County GIS, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), National Ocean

Date of Last Export: 6/13/2025 7:29 AM

Figure 9

Water Resources 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

Date of Last Export: 4/30/2026 1:44 PM

Figure 10

Streams, Waterbodies & Wetlands Map

Benton County Comprehensive Plan

Legend

Flood Hazard Areas

- Floodway
- 100-Year Floodplain (1% Annual Chance)
- 500 Year Floodplain (.2% Annual Chance)
- Waterbodies
- Streams
- Canals
- City Limits
- UGAs

0 — 10 Miles

N

BENTON COUNTY WASHINGTON

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Grant County
Columbia River
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Franklin County
HANKS RD
OLD INLAND EMPIRE HWY
Benton City
224
182
240
82
Snake River
Prosser
22
82
395
Kennewick
Walla Walla County
SELLARDS RD
221
BERT JAMES RD
397
HORRIGAN RD
PLYMOUTH RD
82
MEALS RD
Glade Creek
East Branch Glade Creek
Klickitat County
14
Umatilla National Wildlife Refuge
Columbia River
OREGON
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Umatilla County
Morrow County

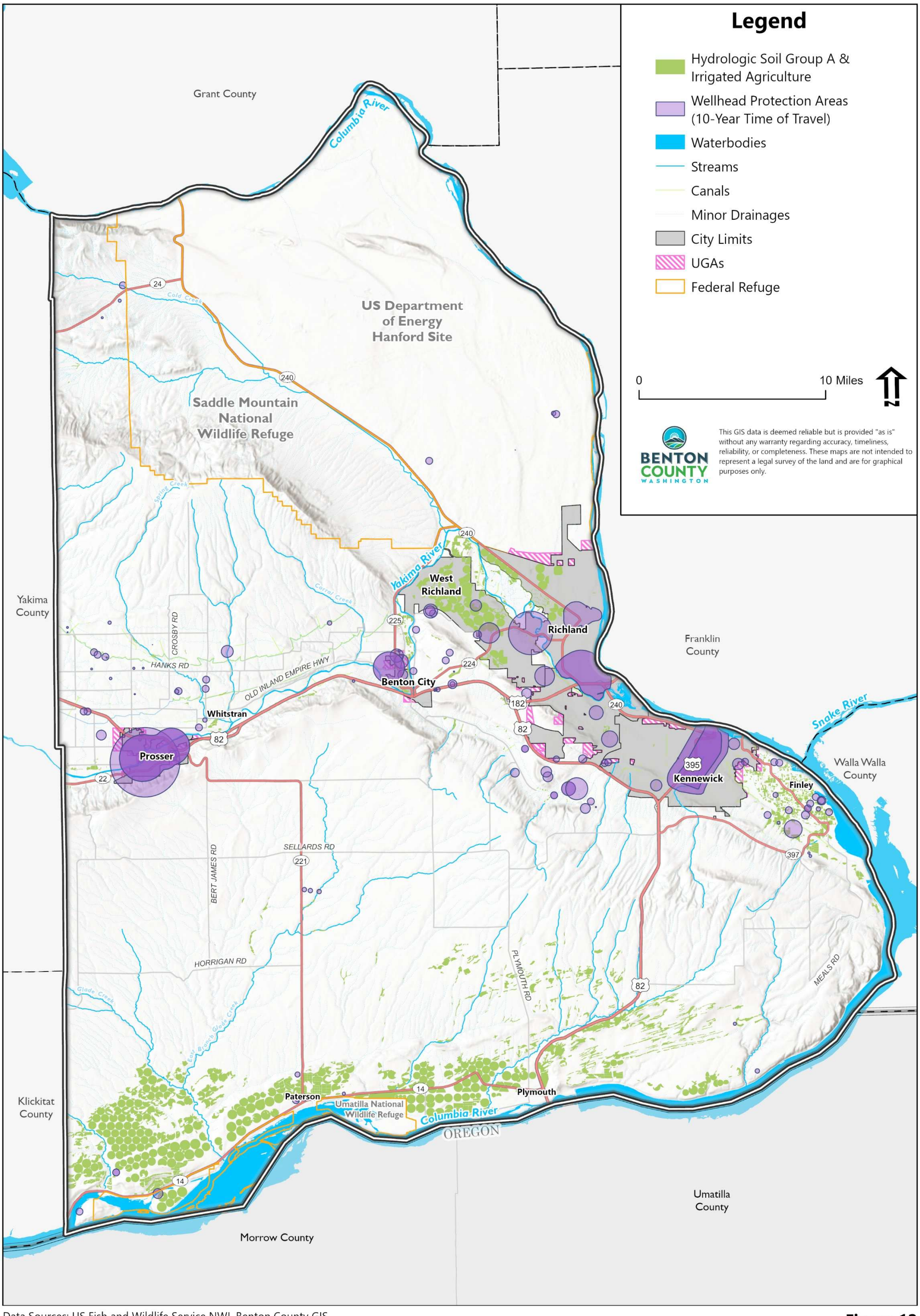
Data Sources: US Fish and Wildlife Service NWI, Benton County GIS, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), National Ocean

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Figure 11

Floodplains Map

Benton County Comprehensive Plan



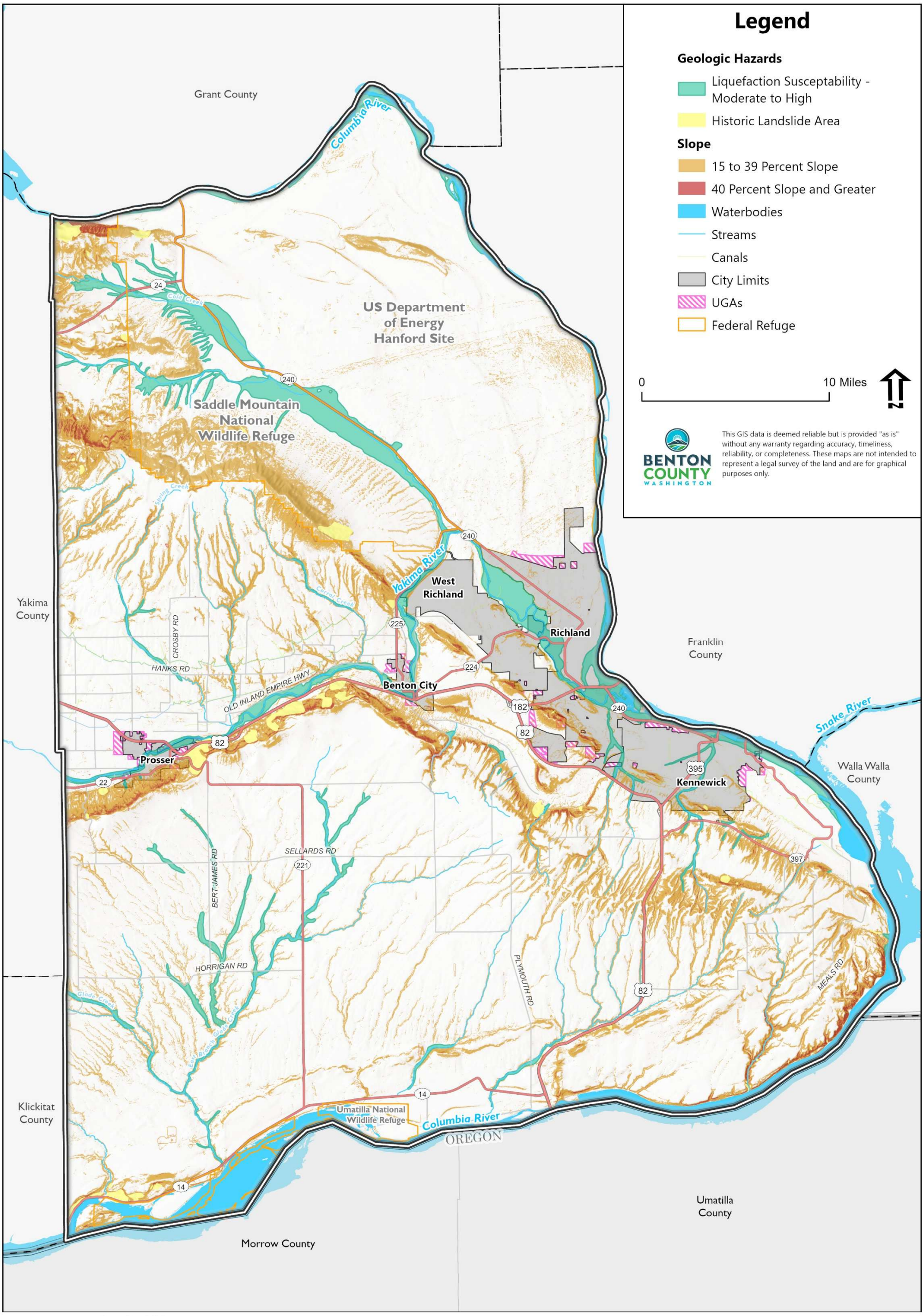
Data Sources: US Fish and Wildlife Service NWI, Benton County GIS, Washington DNR, Washington Department of Health, USDA NRCS SSURGO Soils,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and

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Figure 12

Critical Aquifer Recharge Areas Map

Benton County Comprehensive Plan



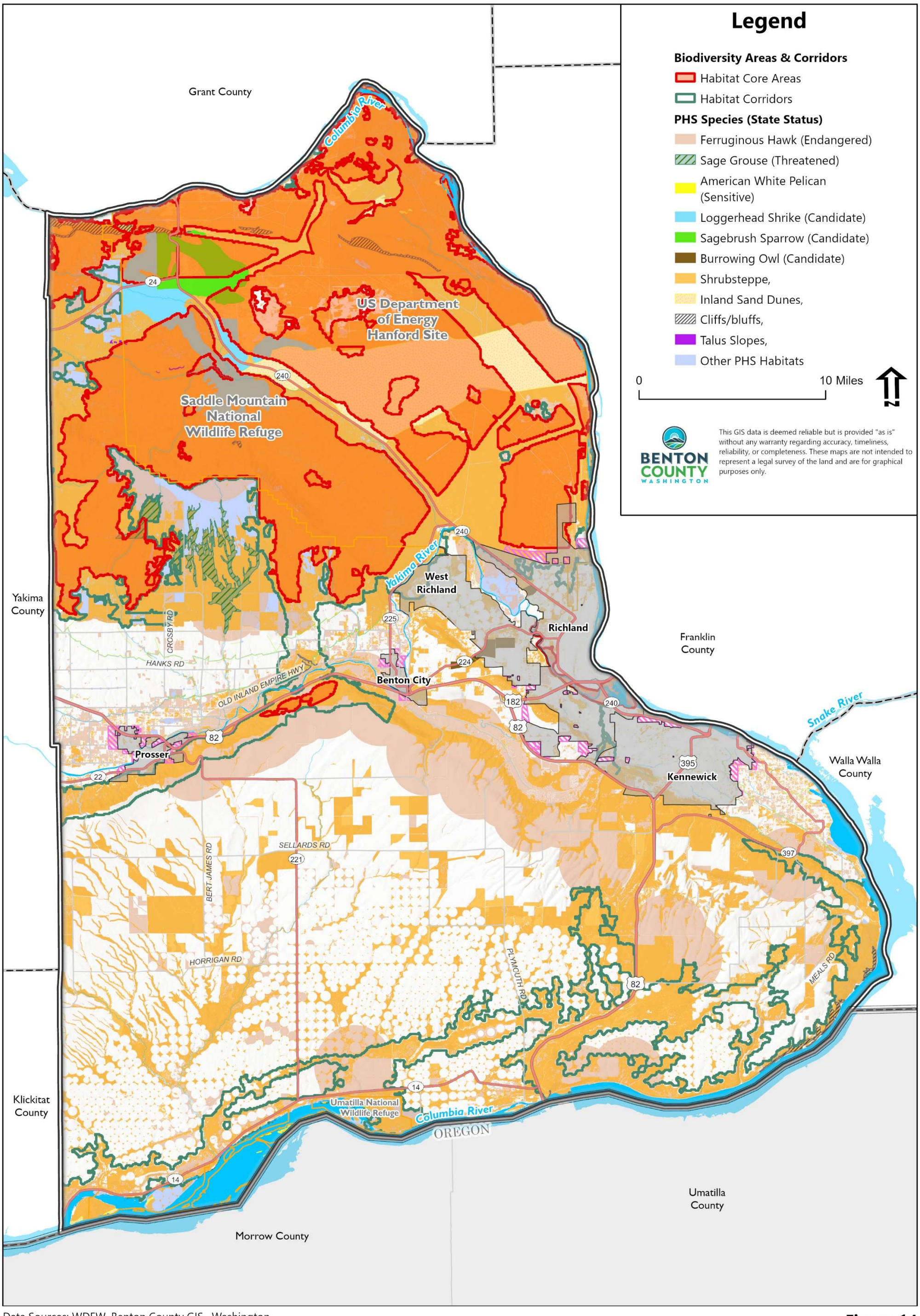
Data Sources: US Fish and Wildlife Service NWI, Benton County GIS, Washington DNR, Washington Department of Health, USDA NRCS SSURGO Soils,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and

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Figure 13

Geologic Hazard Areas Map

Benton County Comprehensive Plan



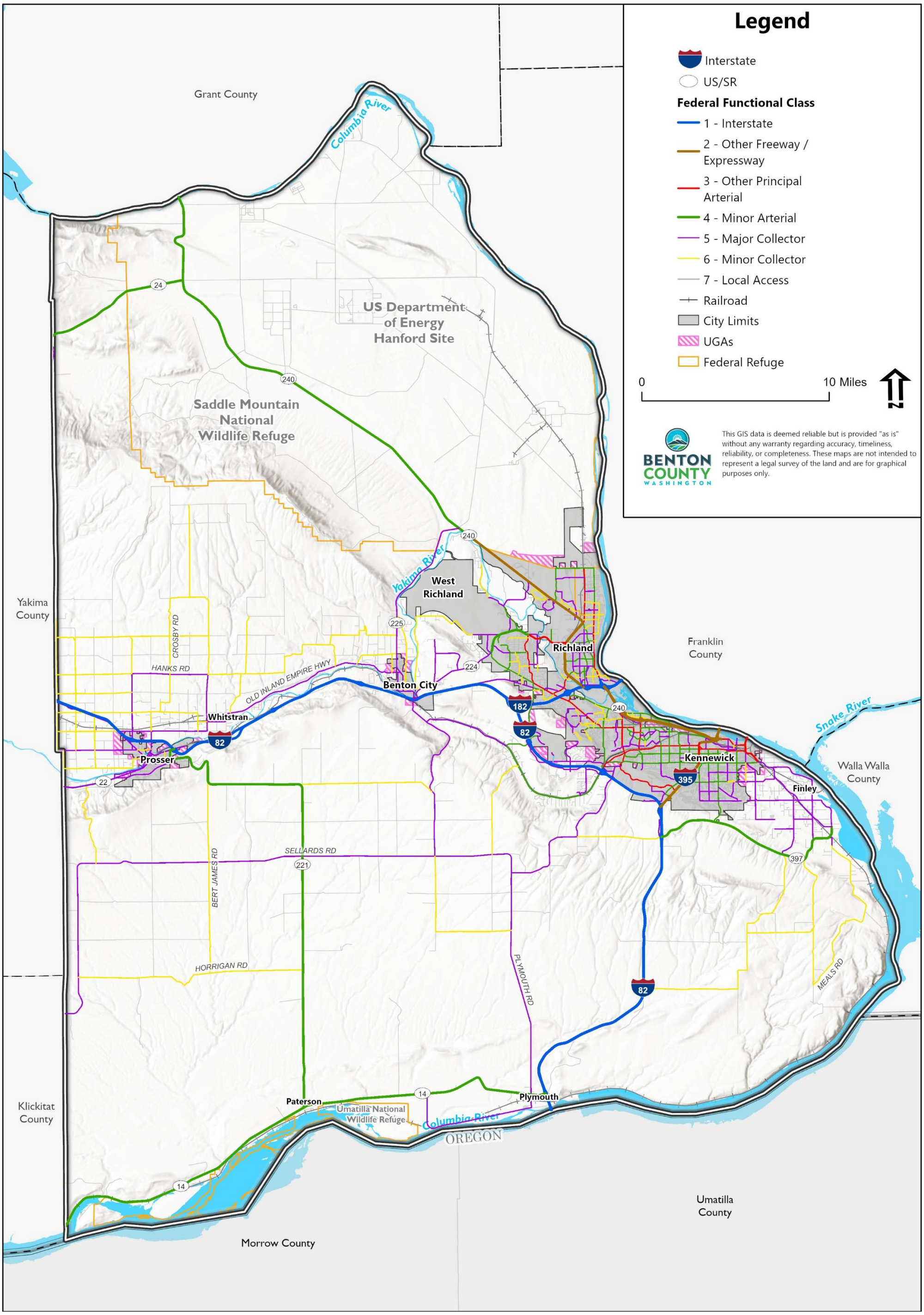
Data Sources: WDFW, Benton County GIS, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), National

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Figure 14

Fish & Wildlife Habitat Conservation Areas Map

Benton County Comprehensive Plan



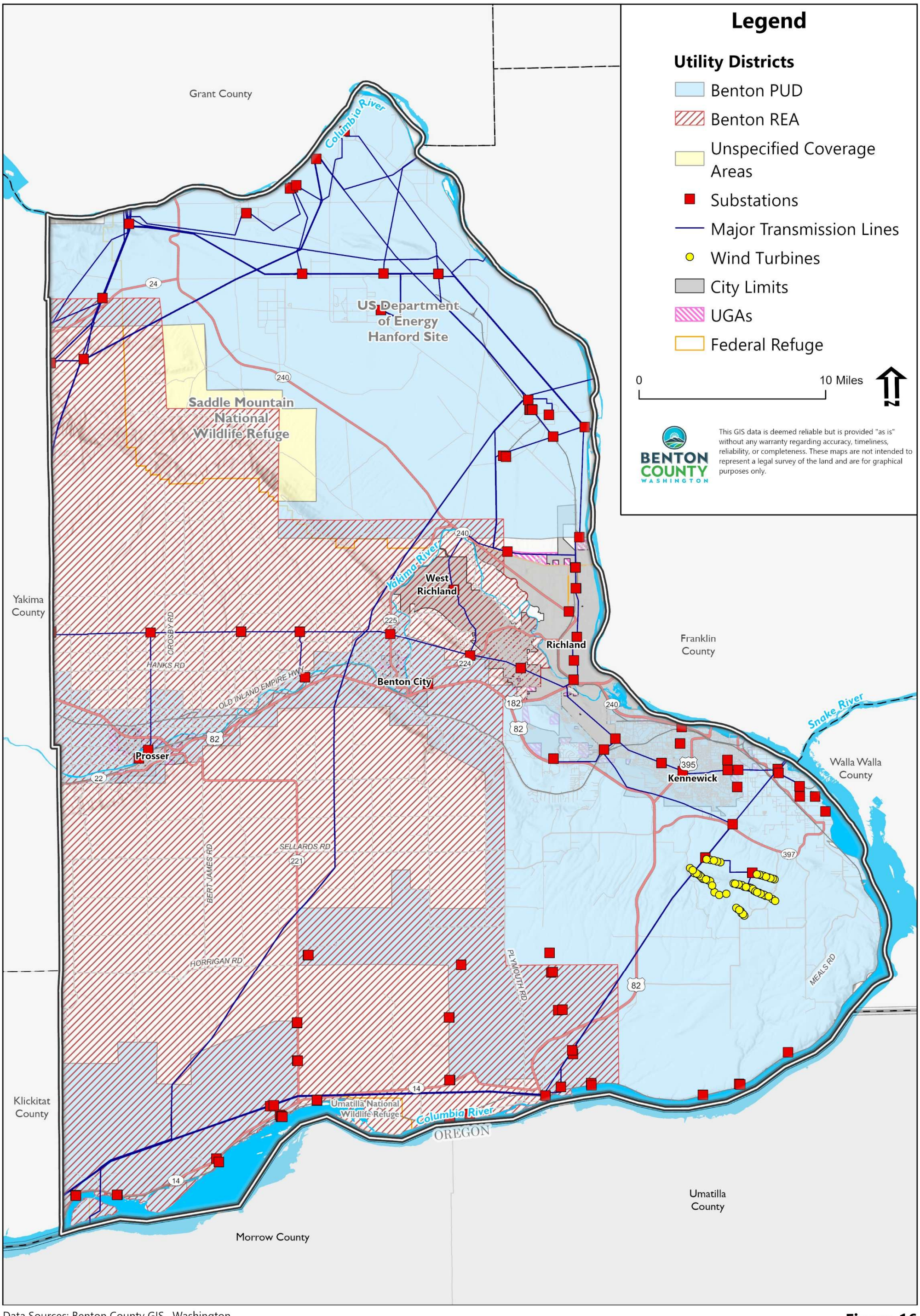
Data Sources: Benton County GIS, Washington DNR,WSDOT, Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric

Date of Last Export: 6/13/2025 7:37 AM

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



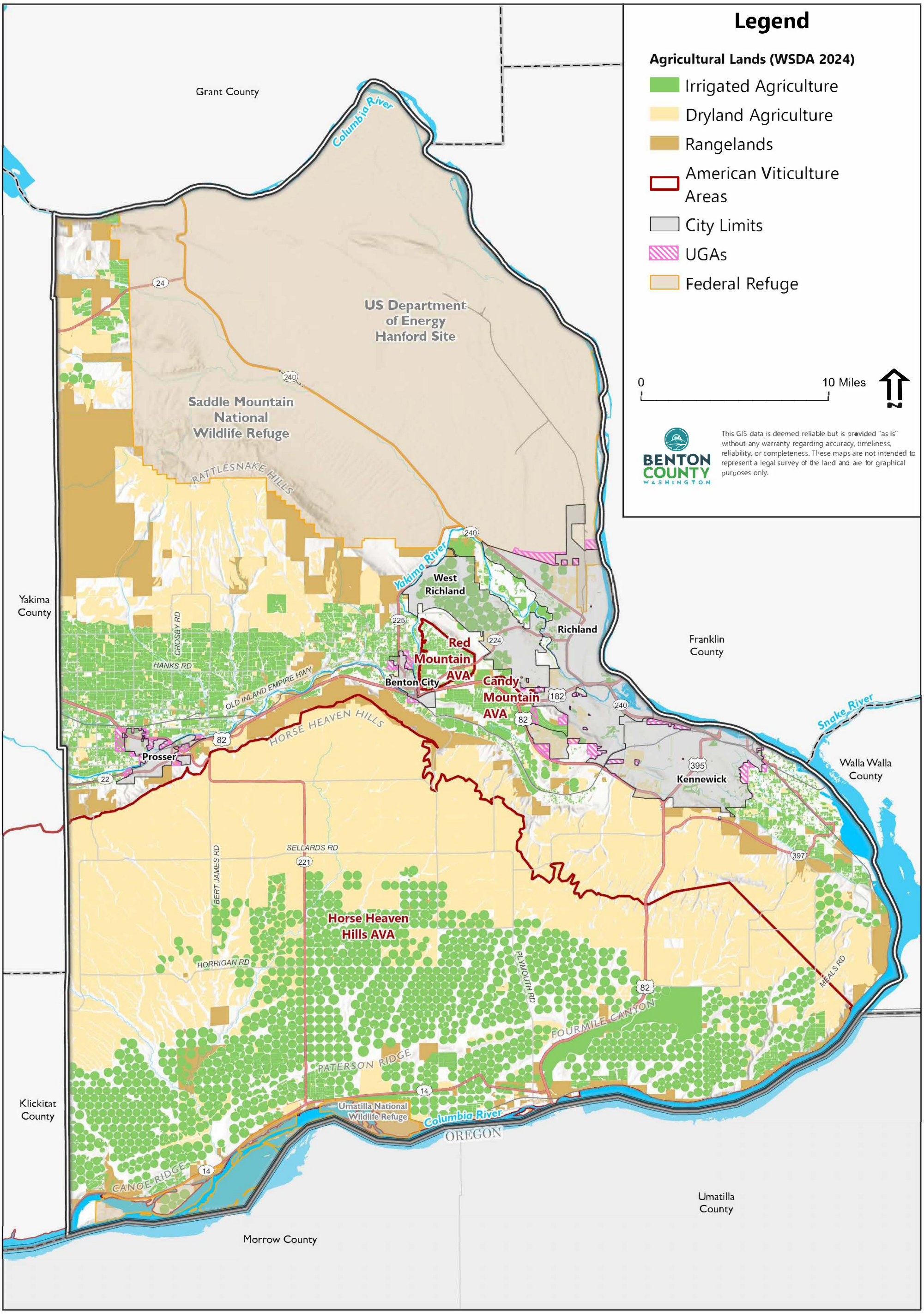
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Figure 17

Geology & Mineral Resources Map

Benton County Comprehensive Plan



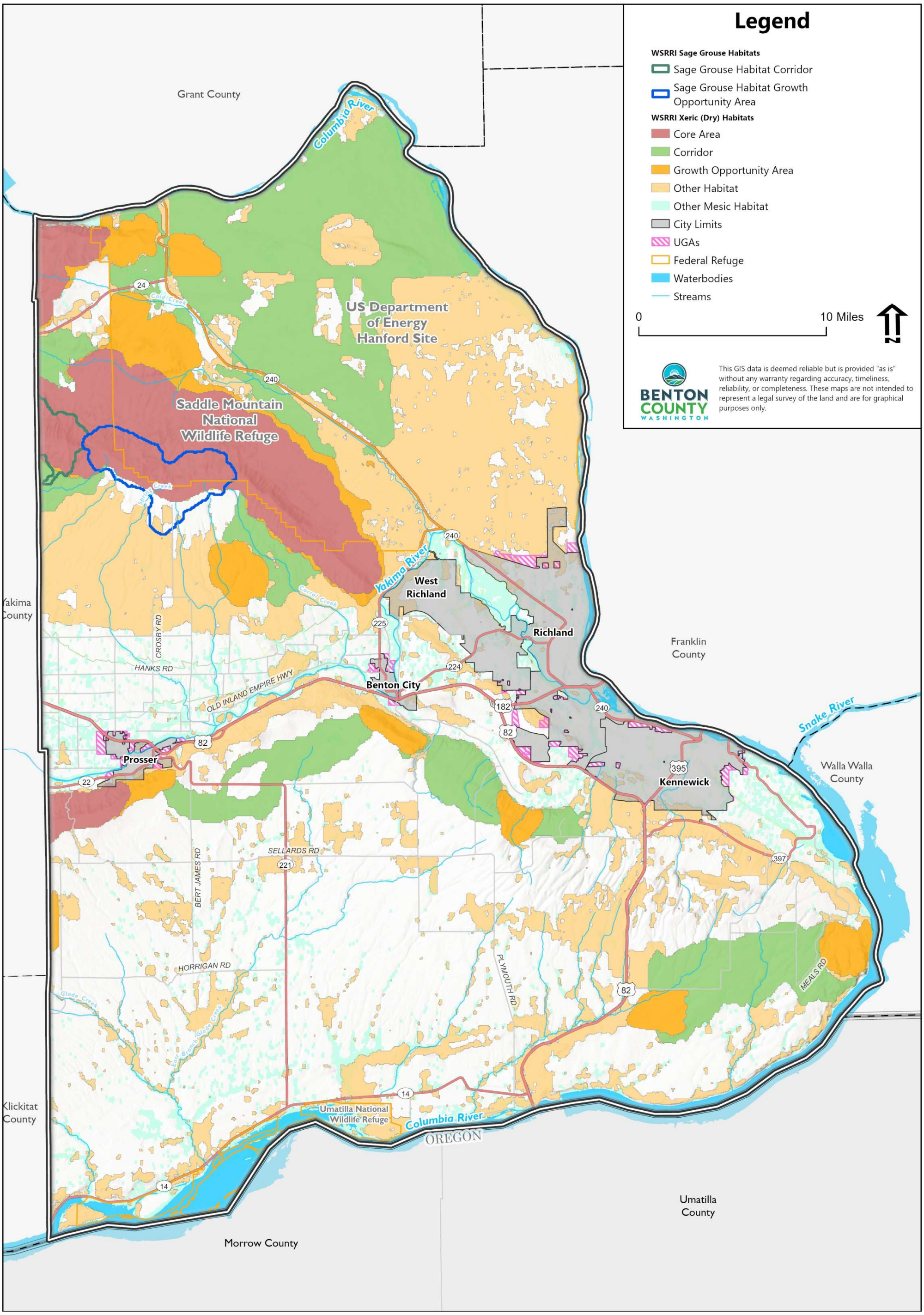
Data Sources: USDA SSURGO, FEMA, Benton County GIS, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), National Ocean

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Figure 18

Agricultural Land Use Map

Benton County Comprehensive Plan



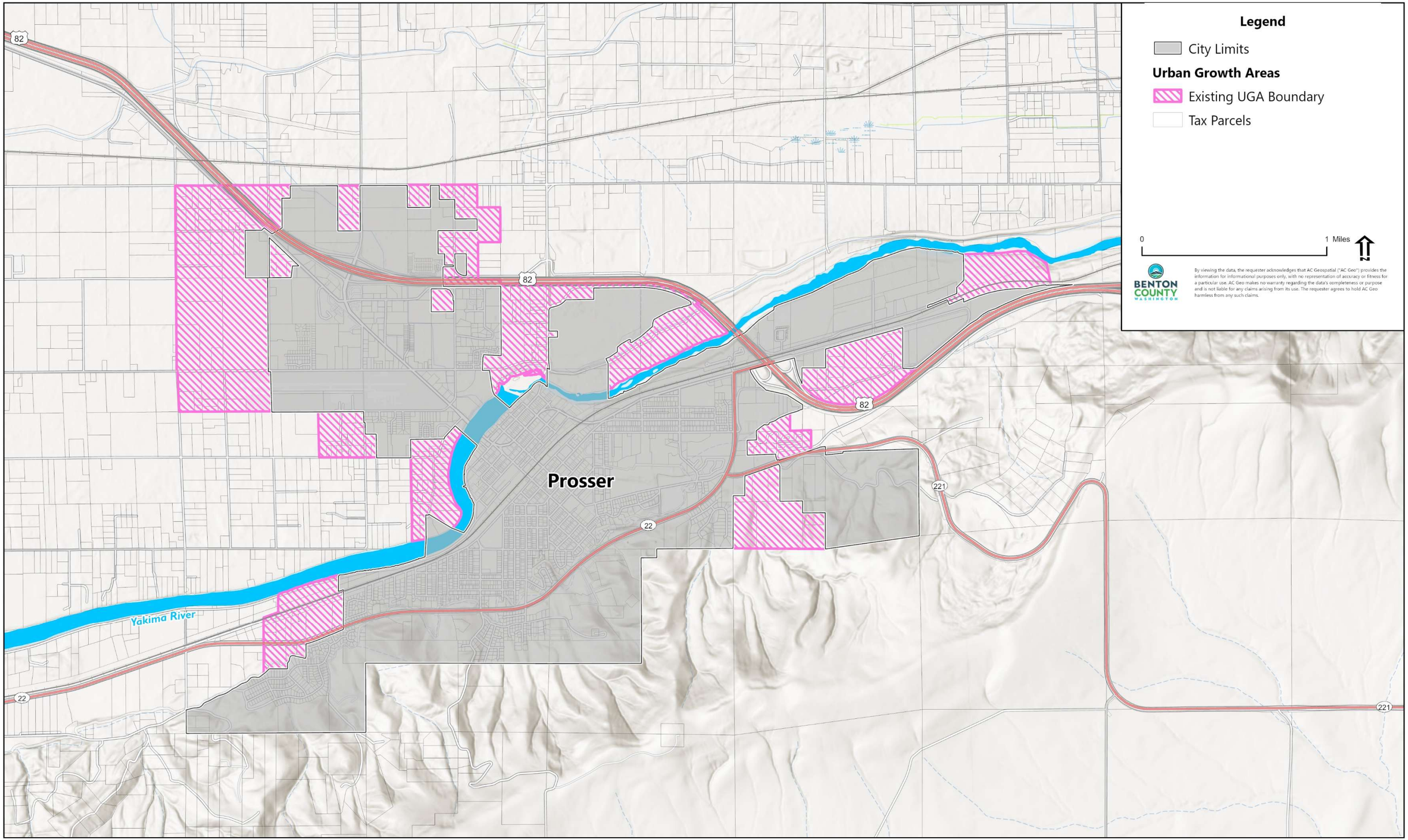
Data Sources: Benton Conservation District, FEMA, Benton County GIS, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), National Ocean

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Figure 19

Washington Shrubsteppe Restoration & Resiliency Map

Benton County Comprehensive Plan



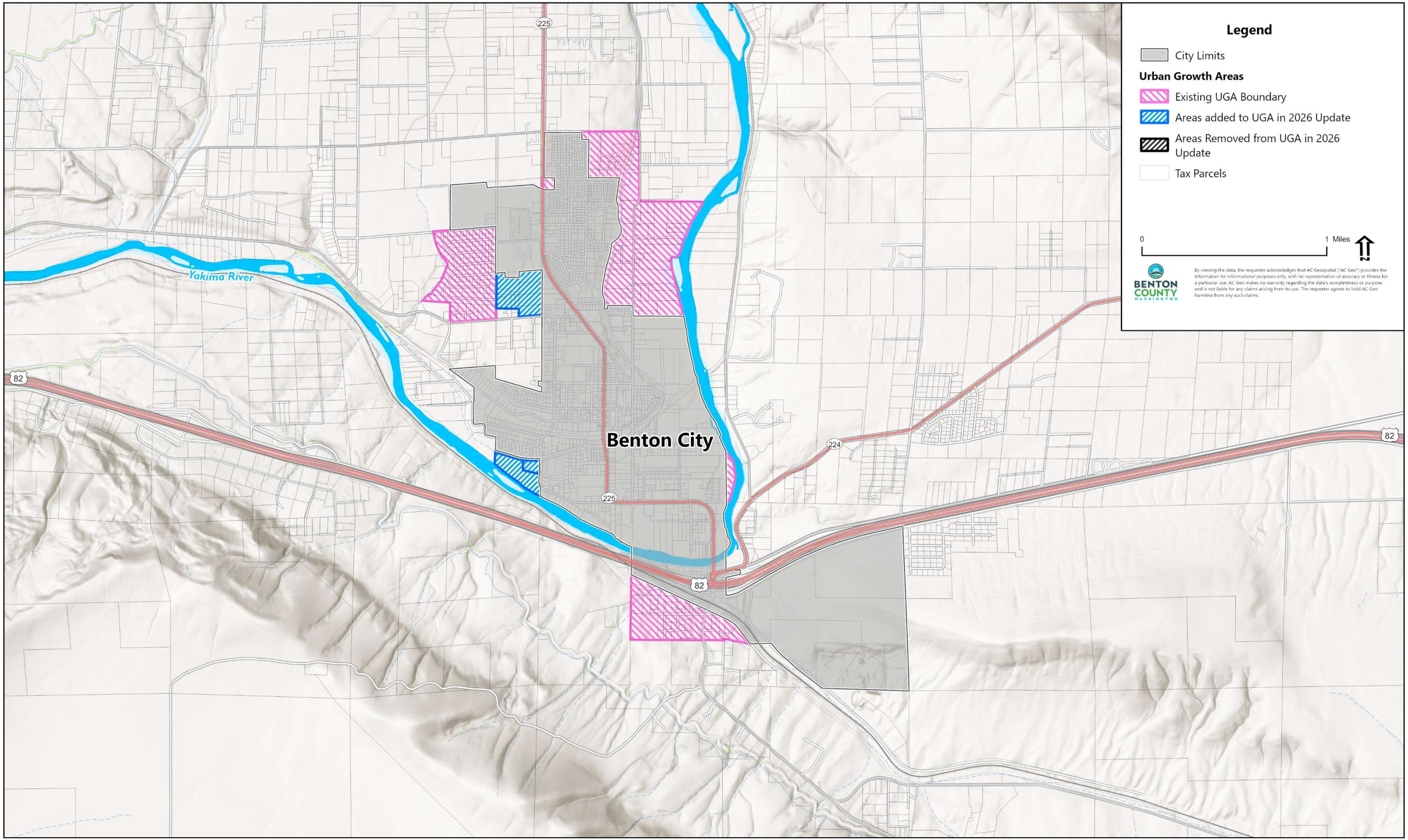
Data Sources: Benton County GIS, Washington Department of Transportation, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), National Ocean Service (NOS), National Geodetic Survey (NGS) ,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

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Figure 20

Prosser UGA Map

Benton County Comprehensive Plan



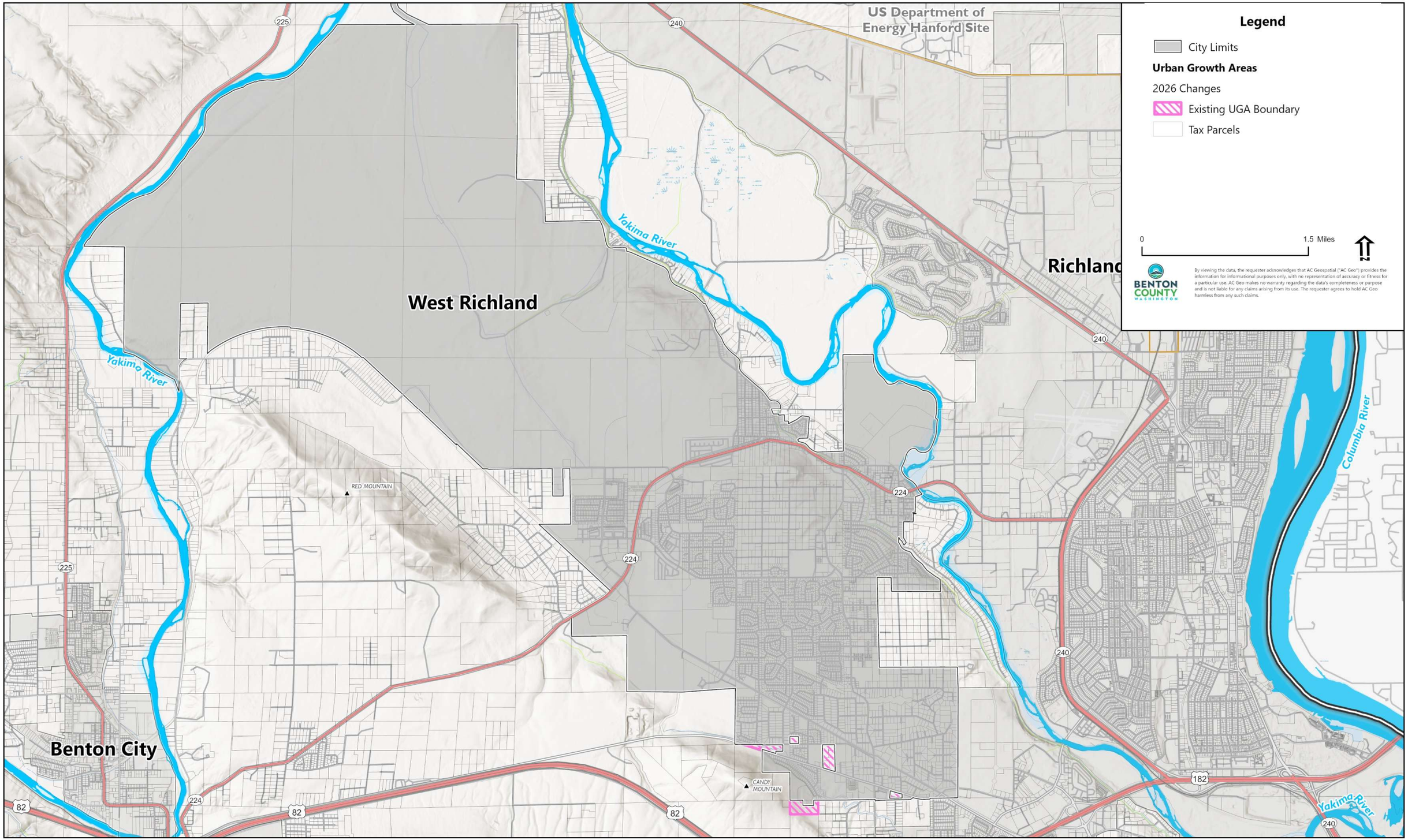
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Figure 21

Benton City UGA Map

Benton County Comprehensive Plan



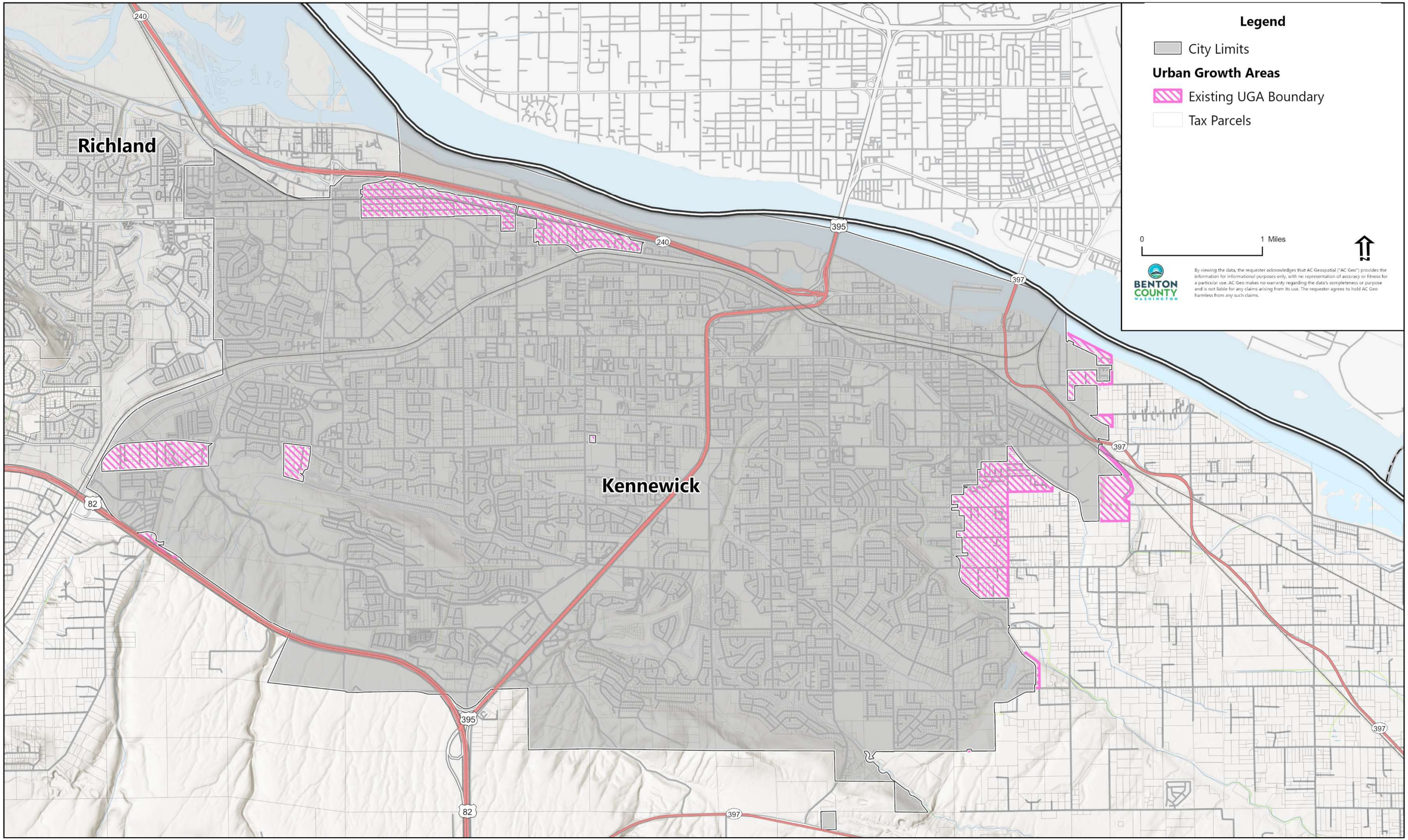
Data Sources: Benton County GIS, Washington Department of Transportation, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), National Ocean Service (NOS), National Geodetic Survey (NGS) ,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

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Figure 22

West Richland UGA Map

Benton County Comprehensive Plan



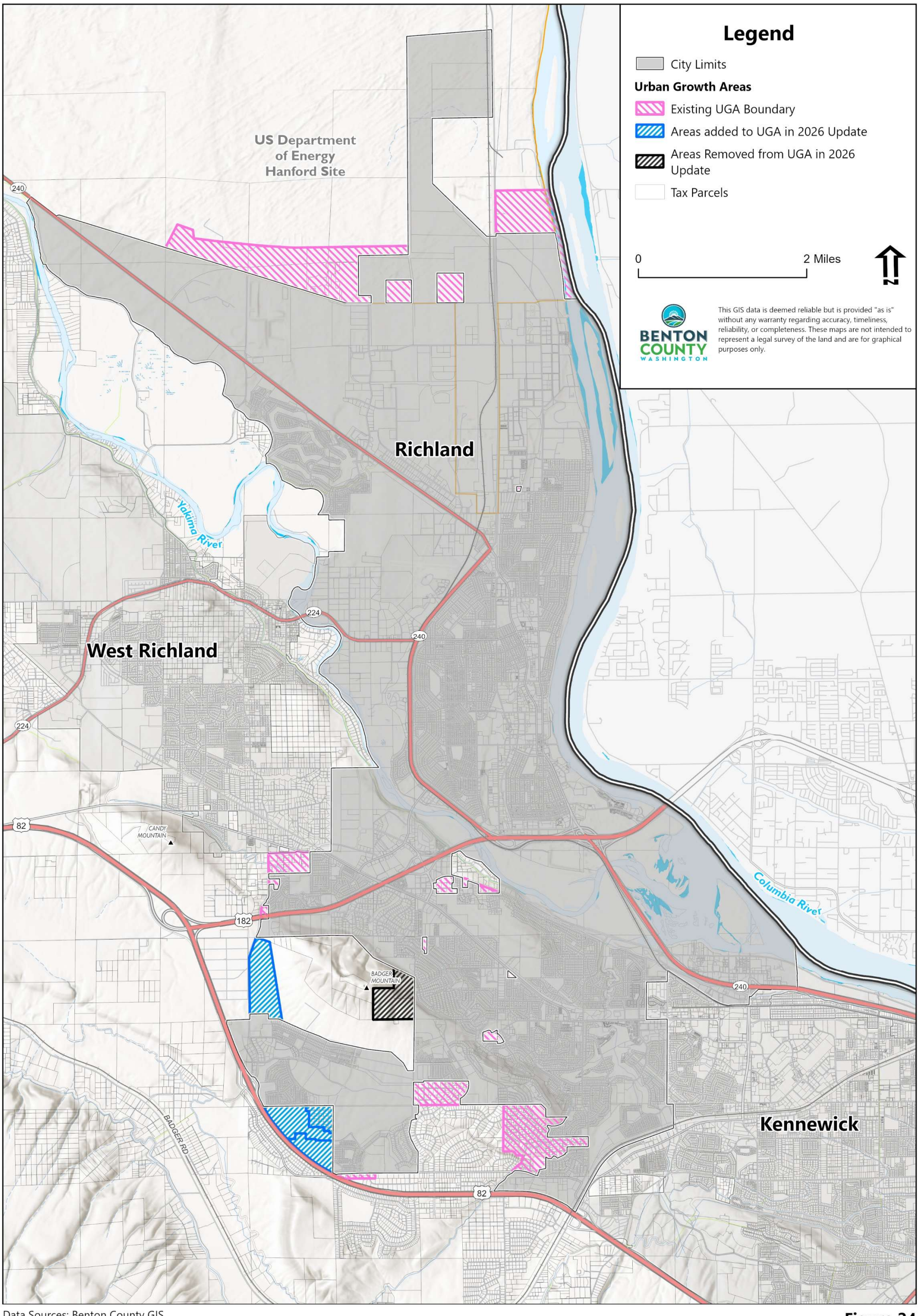
Data Sources: Benton County GIS, Washington Department of Transportation, Washington DNR,Sources: Esri; U.S. Department of Commerce, Census Bureau; U.S. Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), National Ocean Service (NOS), National Geodetic Survey (NGS) ,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

Date of Last Export: 5/3/2026 6:34 PM

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

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

TABLE OF CONTENTS

1 Introduction and Overview 1

2 Public Participation Goals and Objectives 3

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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

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

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

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

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,

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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

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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

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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.

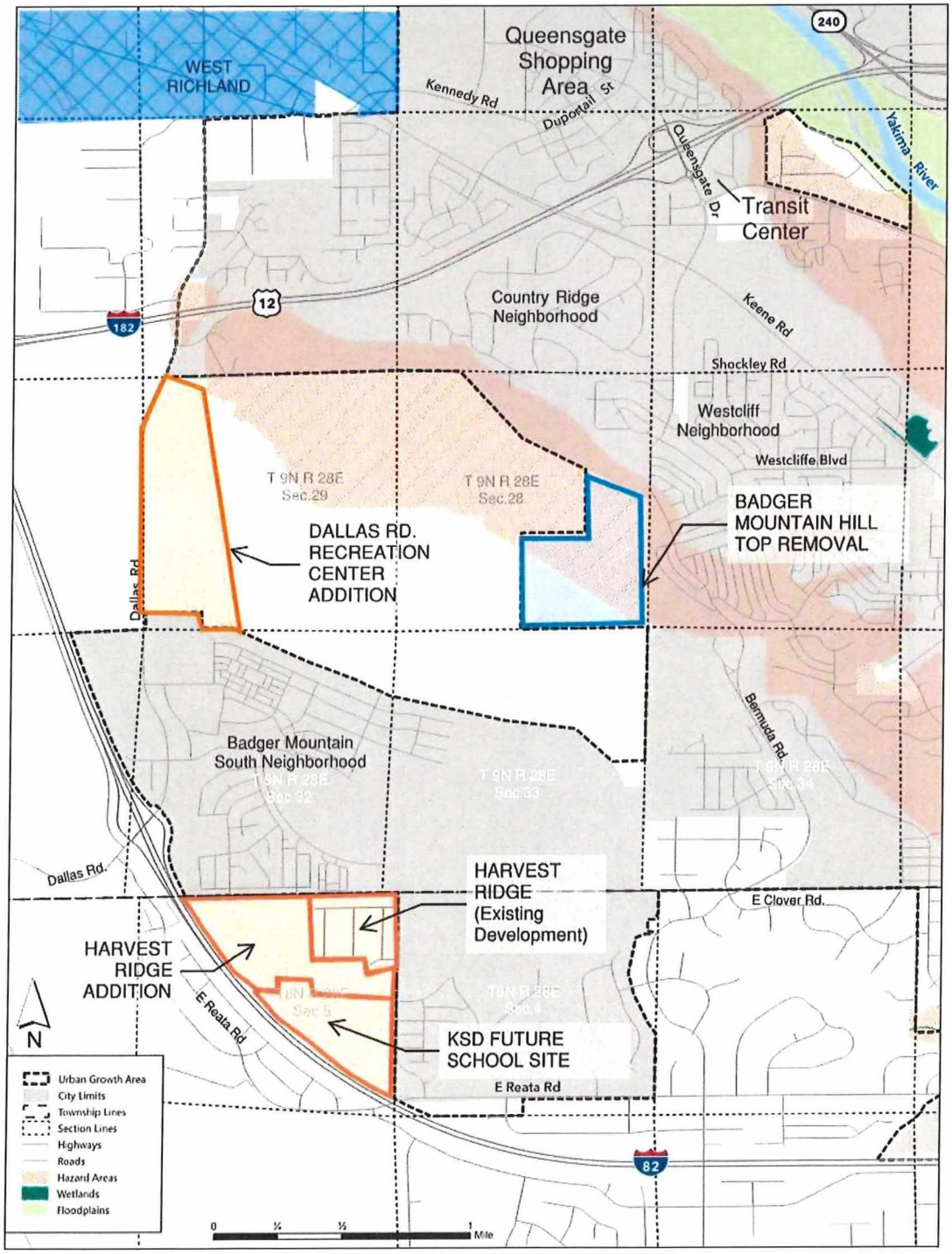


Exhibit A: Site Map with surrounding features, selected critical areas (Prepared 11/25/25)
Note: Critical Aquifer Recharge Areas are not shown; See Exhibit C for Priority Habitat Areas per WDFW



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

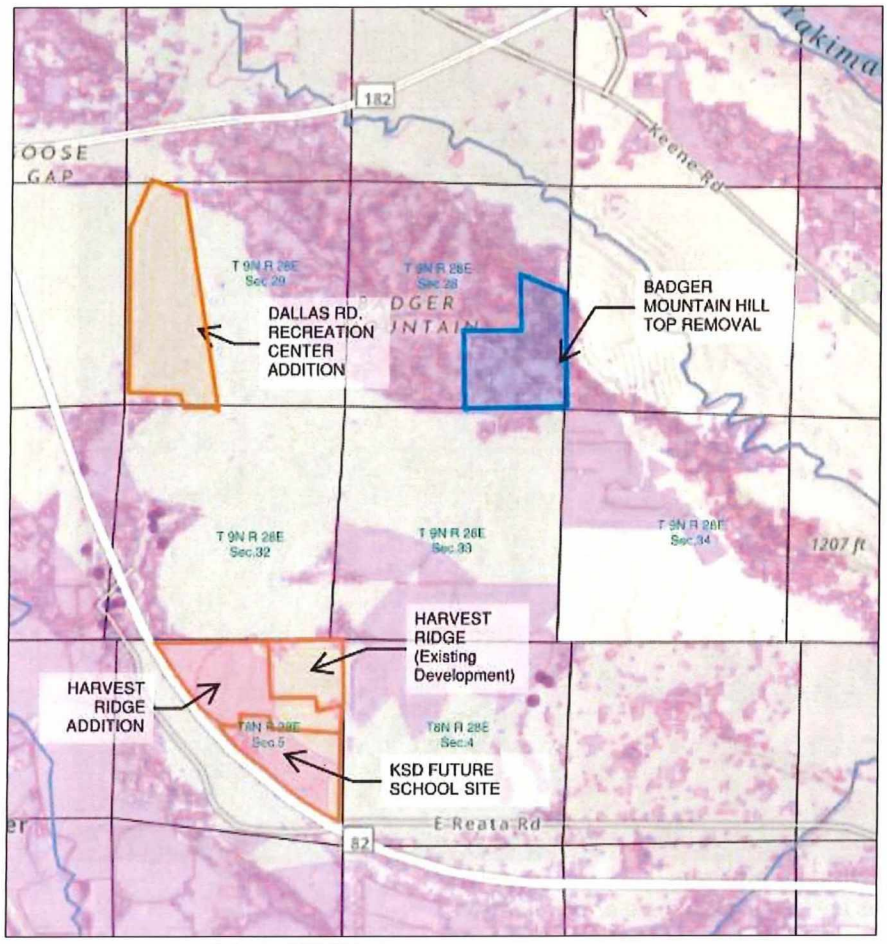


Exhibit C: WDFW Mapped Habitat Areas with annotations (Prepared 11/25/25)



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

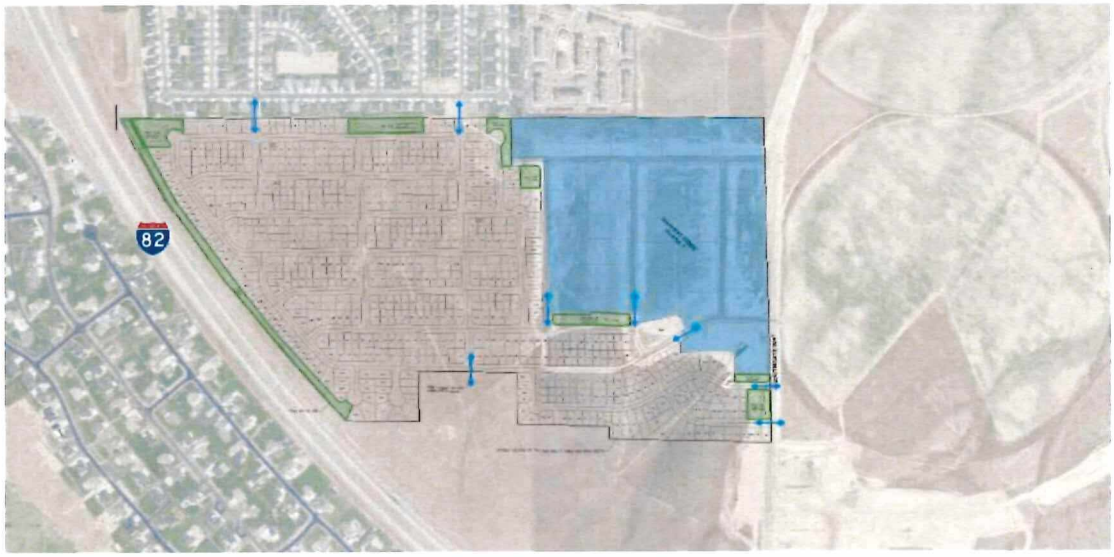


Exhibit E: Harvest Ridge Addition Concept
(Prepared 11/25/25*)*
Note: This is a very preliminary conceptual example demonstrating that the standard of a min. 6 DU/ acre can be achieved; the image shows 611 lots, potential open space areas, and a potential vehicular circulation approach)

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

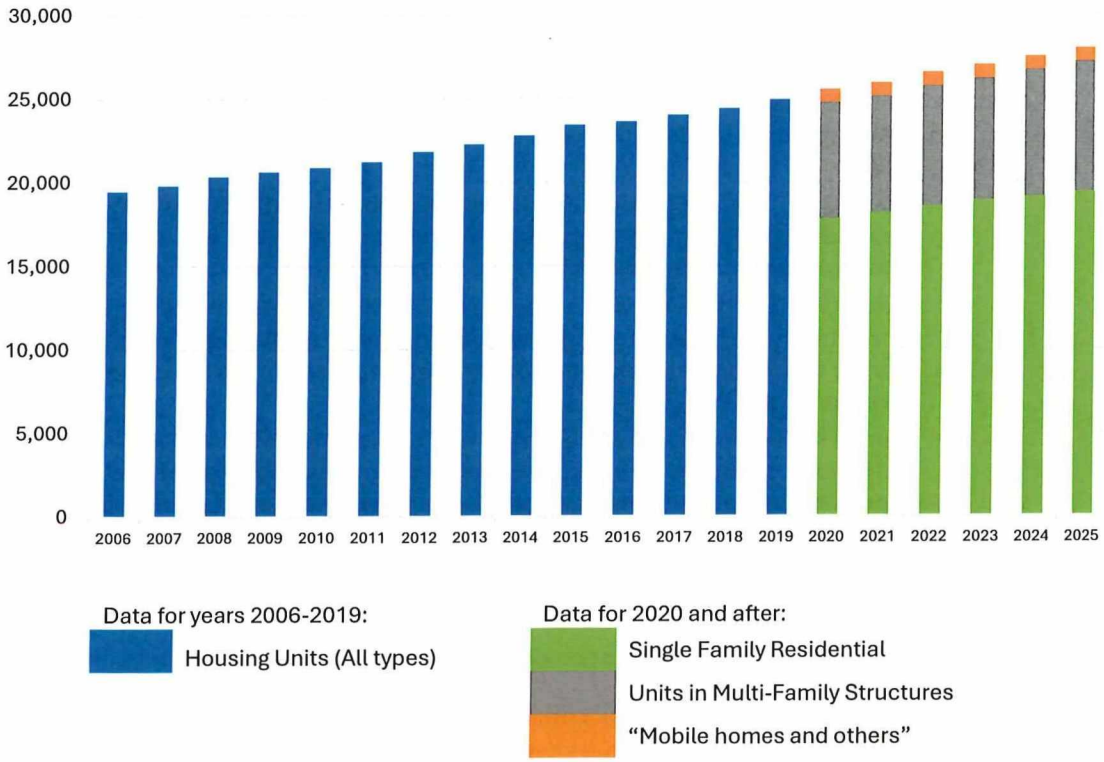
and also to avoid costly extension of infrastructure that would have fewer efficiencies elsewhere.

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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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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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:

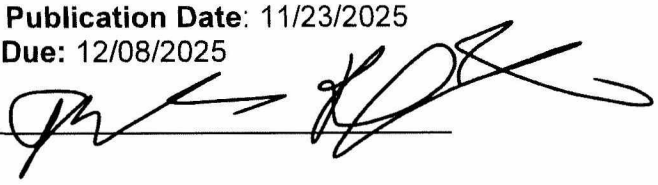
- Approximately 190 acres of APN 129982012465001 in the W½ of Section 29 Township 9N Range 28 EWM, addressed as 12702 N Dallas Road, Richland.
- APN 128984000000000, approximately 97 acres, located in the S½ of SE¼ and the S½ of the NW ¼ of the SE ¼ of Section 28 Township 9N Range 28 EWM.
- Approximately 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.

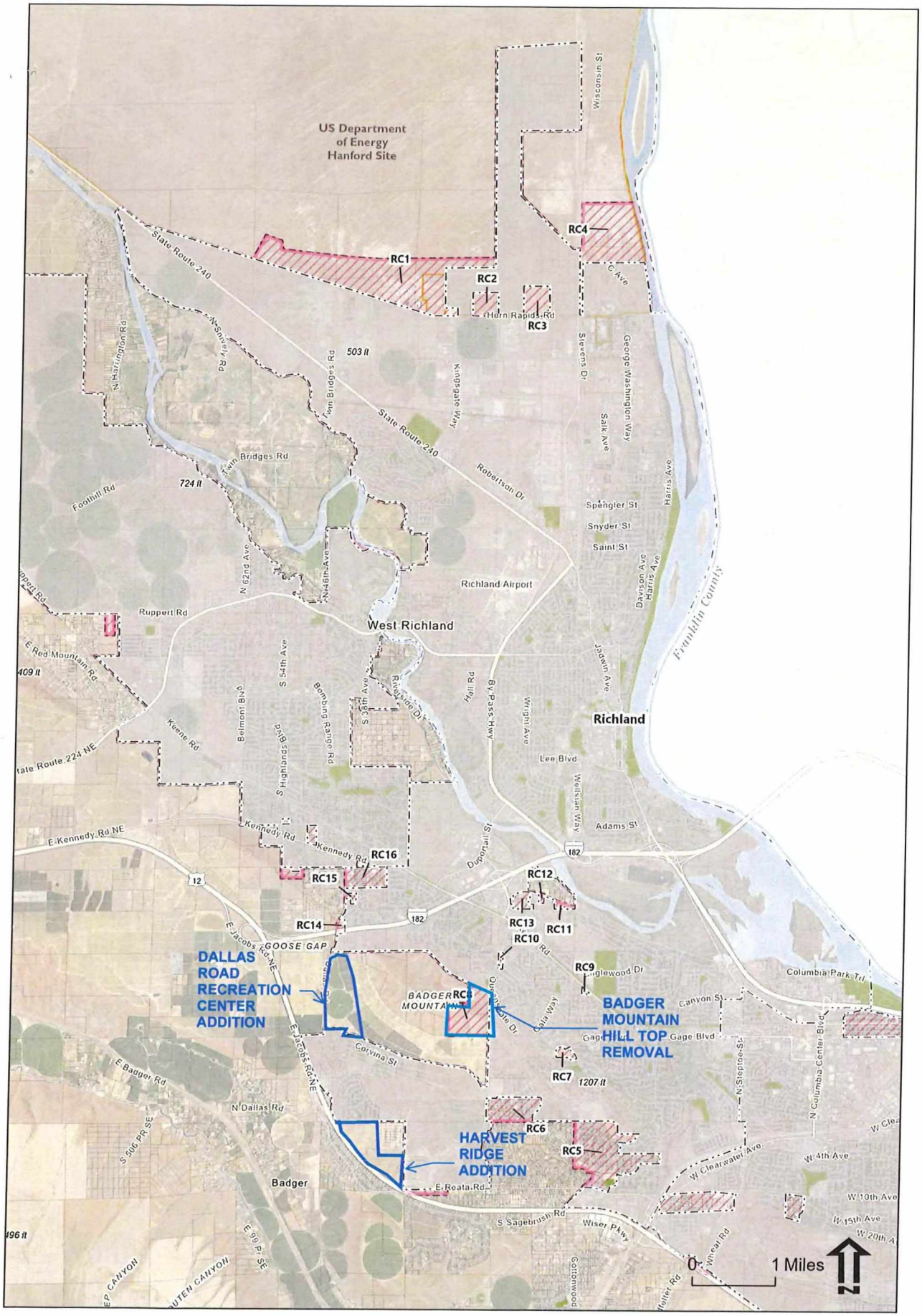
Lead Agency: City of Richland

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

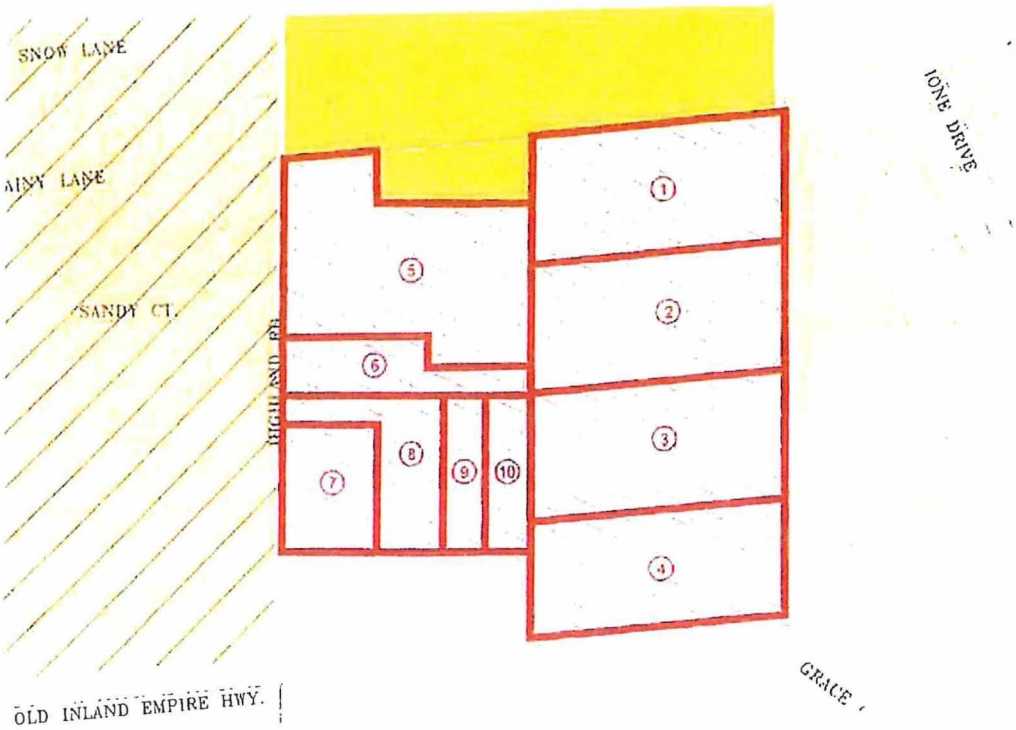
Attest:

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:

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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

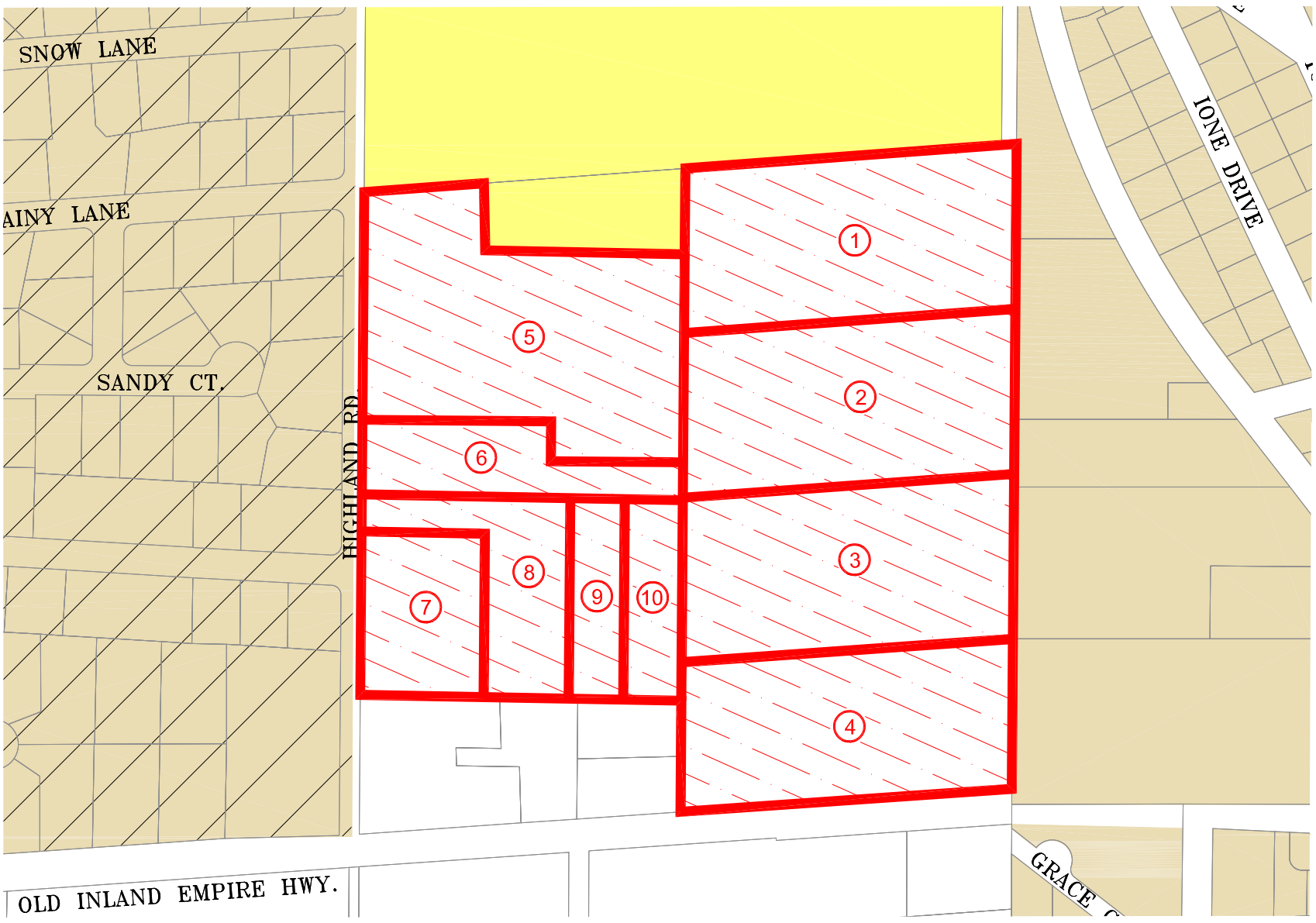
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SCALE IN FEET

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

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
2815 Saint Andrews Loop, Ste B
Pasco, WA 99301
Voice (503) 652-9090



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

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

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?**

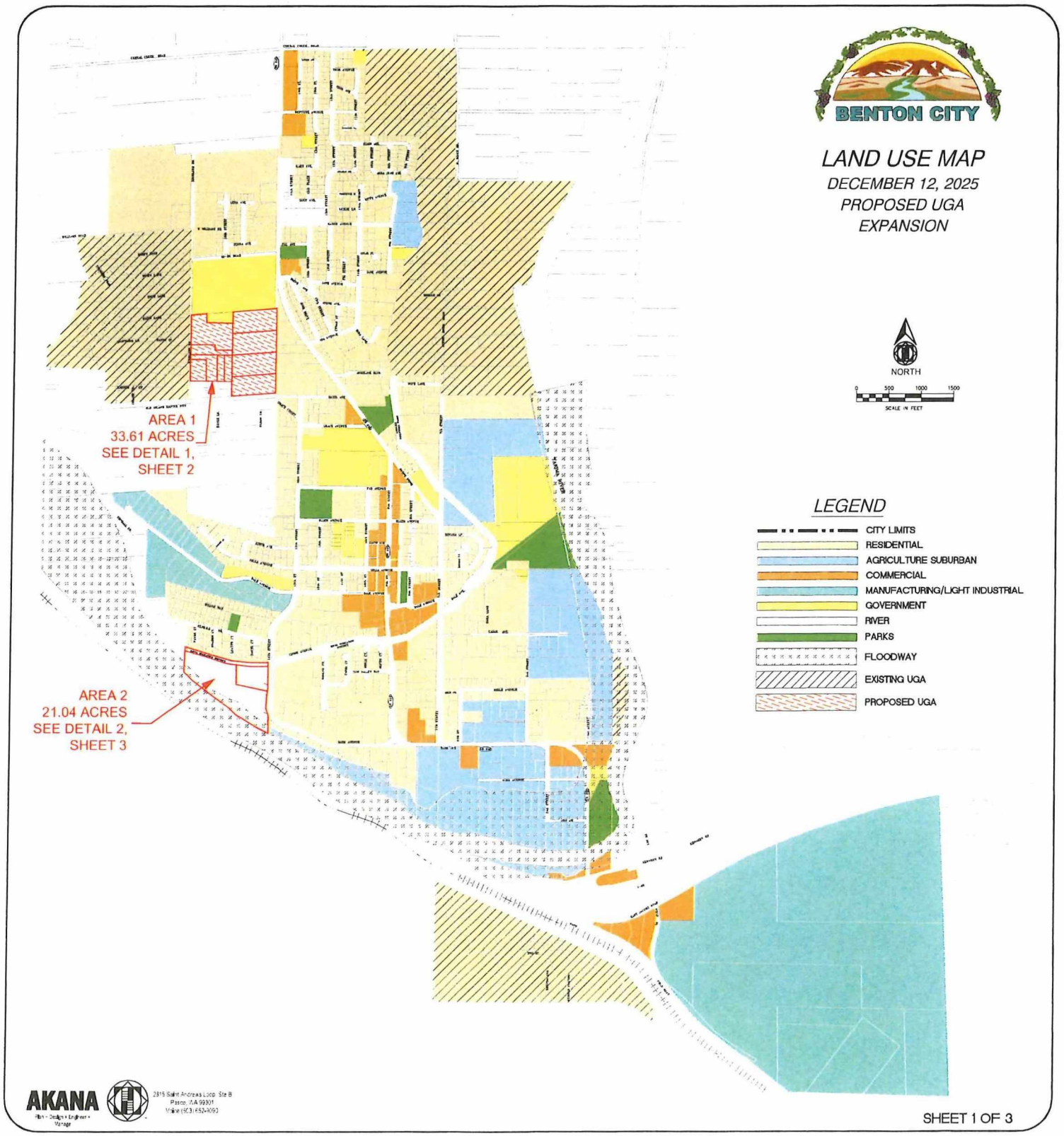
   As a non-project action, the amendments to the Comprehensive Plan will not directly increase demands on transportation or public services and utilities.

   - **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
Plan • Design • Engineer • Manage
2815 Saint Andrews Loop Ste B
Pasco, WA 99301
Voice (509) 582-9090



PROPERTY DESCRIPTIONS

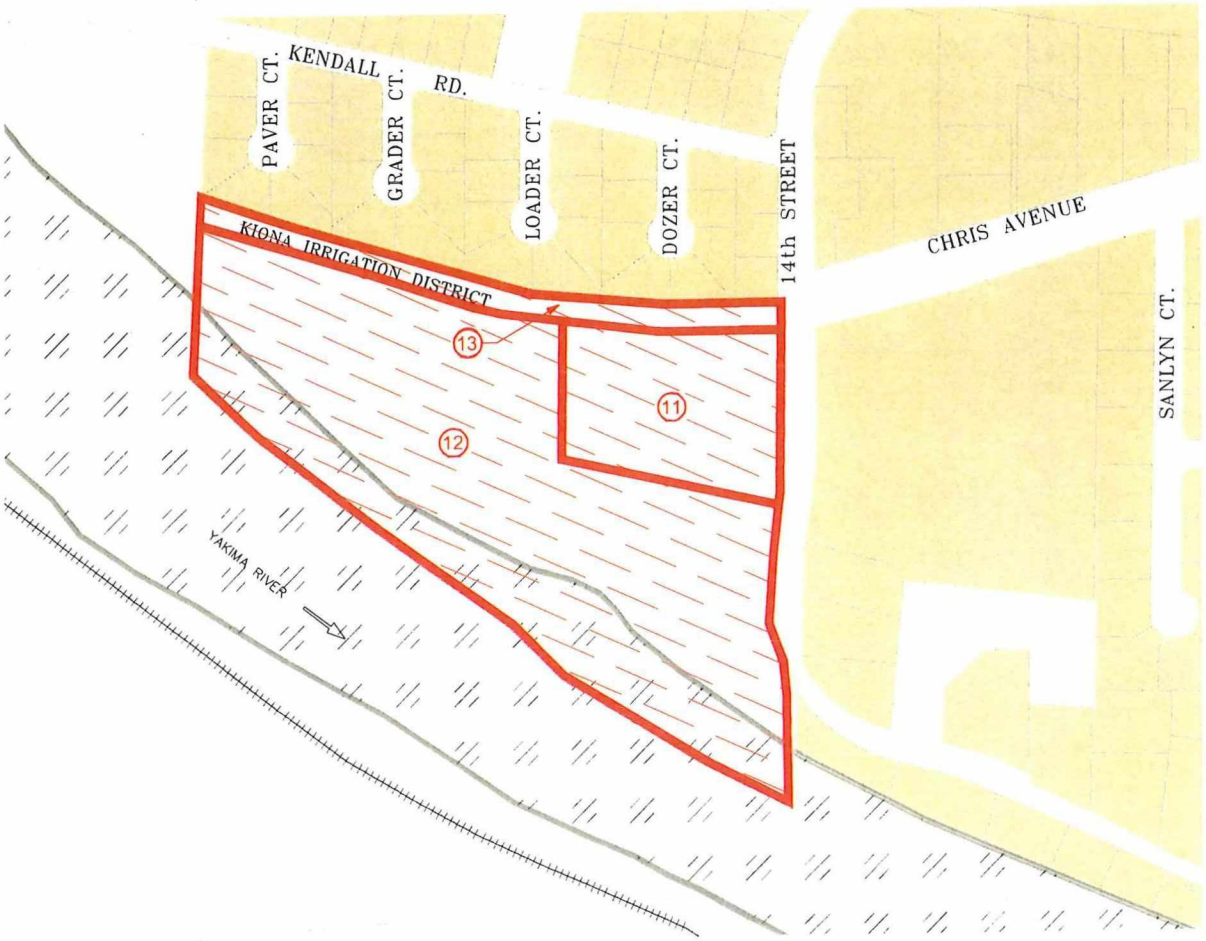
ALL PROPERTIES COUNTY ZONING: RL-5
PROPOSED CITY LAND USE: RESIDENTIAL

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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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]

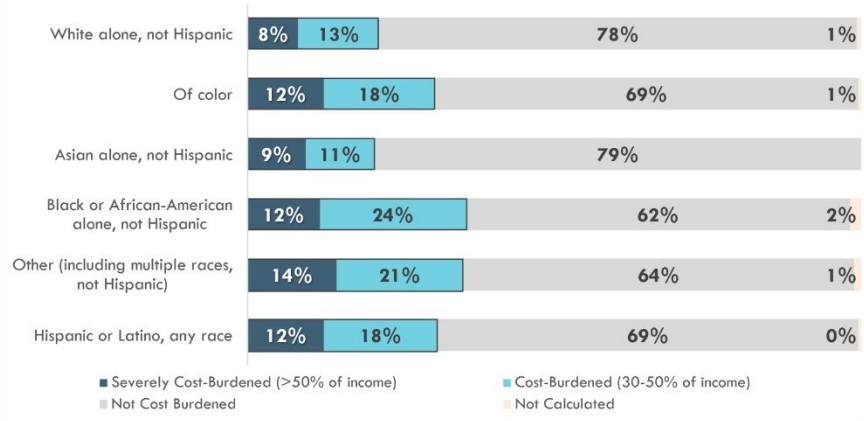
Racially disparate impacts

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.

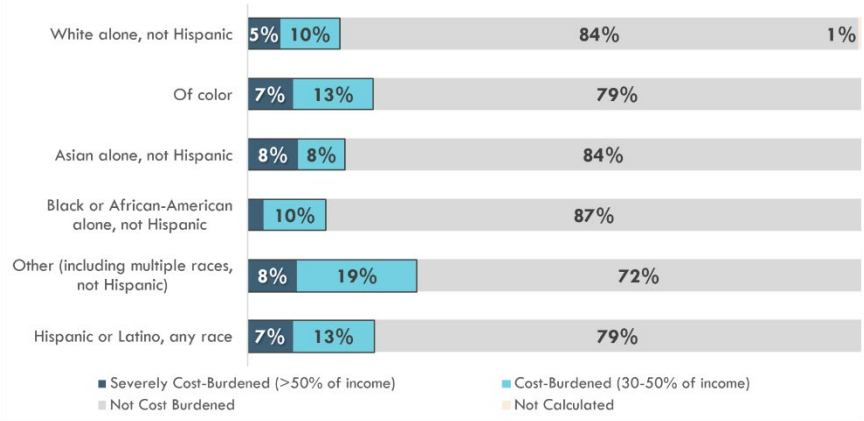
Figure 61 Proportion of All Households by Race and Cost Burden, Benton County (2016-2020)



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

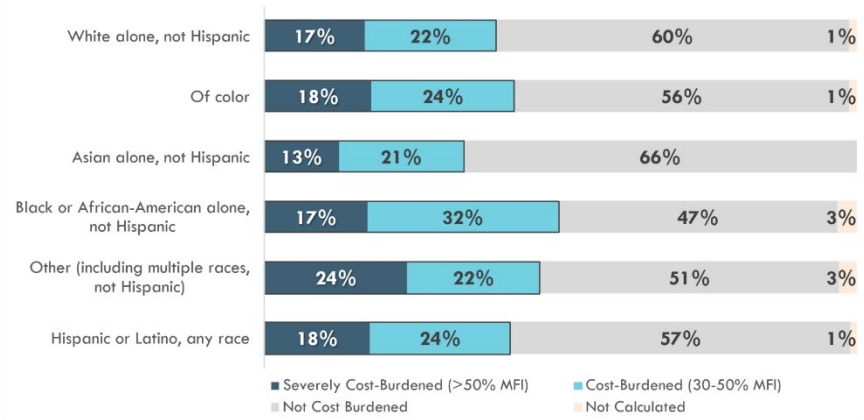
In general, renters are more likely to be cost-burdened than homeowners, highlighting a connection between housing vulnerability and tenure. While 15% of White-alone and 20% of People of Color owner households are cost-burdened, the rates are significantly higher among renters: 39% for White-alone and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

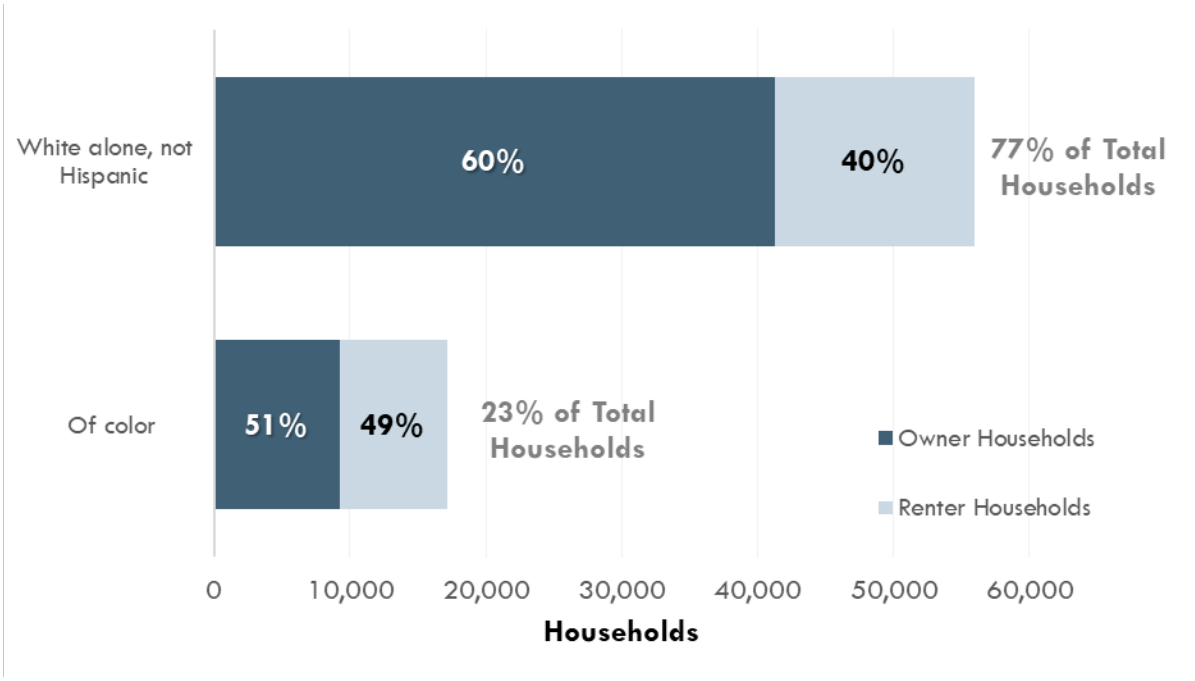


Sources: US HUD Comprehensive Housing Affordability Strategy (CHAS), 2016–2020; BERK, 2025.

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.

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

[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.

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]

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.

[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

[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.

References

Christensen, J., 2016. Re: Comments Regarding the GMA-AG Designation for the UGA Expansion Area. Memo to Benton County Planning Commission. October 16, 2016.

Clark County v. Western Washington Growth Management Hearings Board, 2011. Division II Appellate Court. No. 39564-1-II. Available online at http://courts.mrsc.org/appellate/161wnapp/161wnapp0204.htm. Decided April 13, 2011.

Duncan, B., 2017. Re: Benton County Soils Production – Comprehensive Planning. Email communication to A. Hill, Anchor QEA. June 26, 2017.

Lewis County v. Western Washington Growth Management Hearings Board, 2006. Supreme Court of Washington, En Banc. No. 76553-7. Available online at http://caselaw.findlaw.com/wa-supreme-court/1256683.html. Decided August 10, 2006.

Revised Code of Washington (RCW) 36.70A. Available online at http://app.leg.wa.gov/RCW/default.aspx?cite=36.70A. Accessed May 26, 2017.

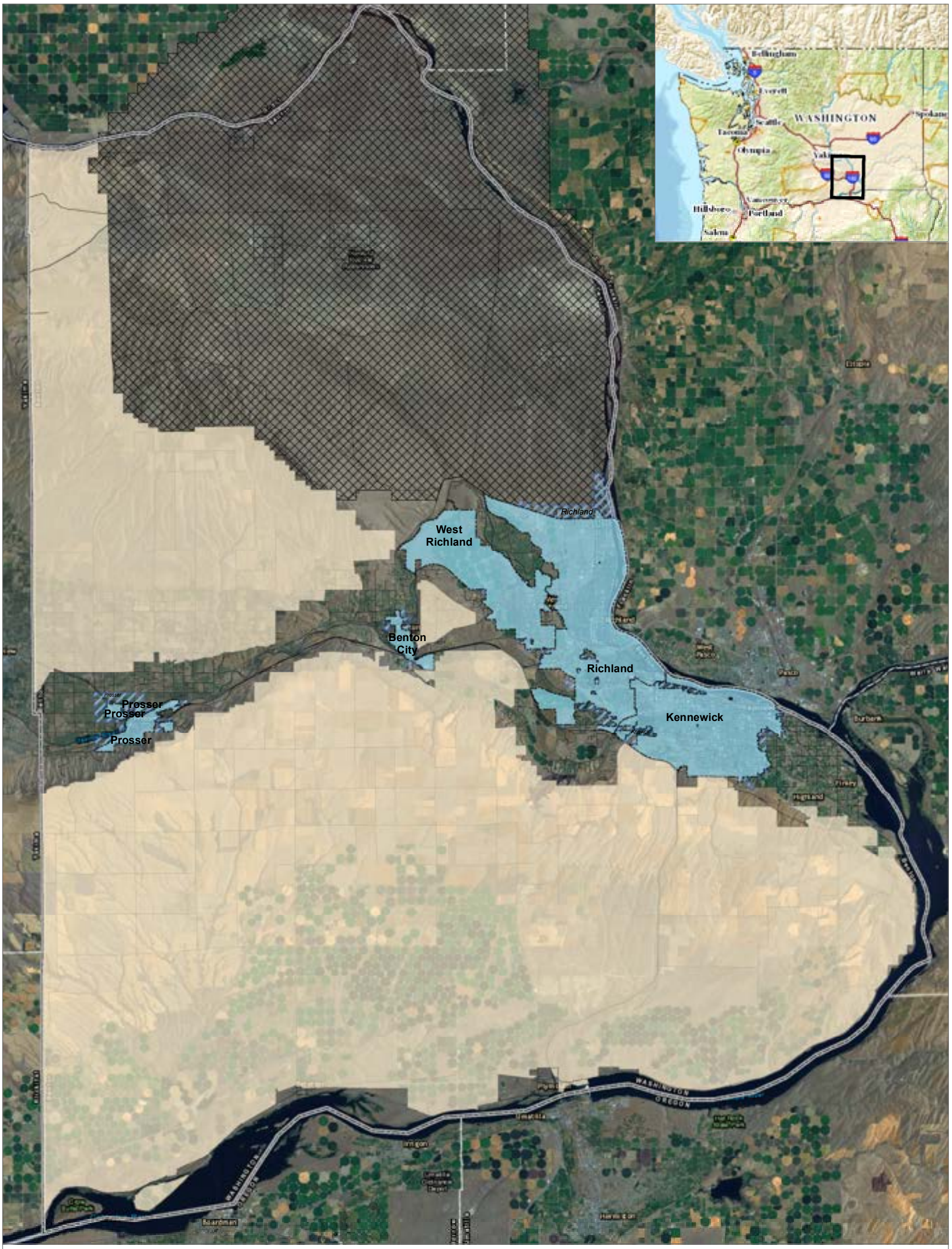
Washington Administrative Code (WAC) 16-230. Available online at http://app.leg.wa.gov/WAC/default.aspx?cite=16-230. Accessed June 5, 2017.

Washington Administrative Code (WAC) 365-190. Available online at http://app.leg.wa.gov/WAC/default.aspx?cite=365-190. Accessed May 26, 2017.

Washington State University AgWeatherNet. Available online at http://weather.wsu.edu/. Accessed May 26, 2017.

Figures

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LEGEND:

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

Land Use (2011)

District

- GMA AG

NOTE(S):

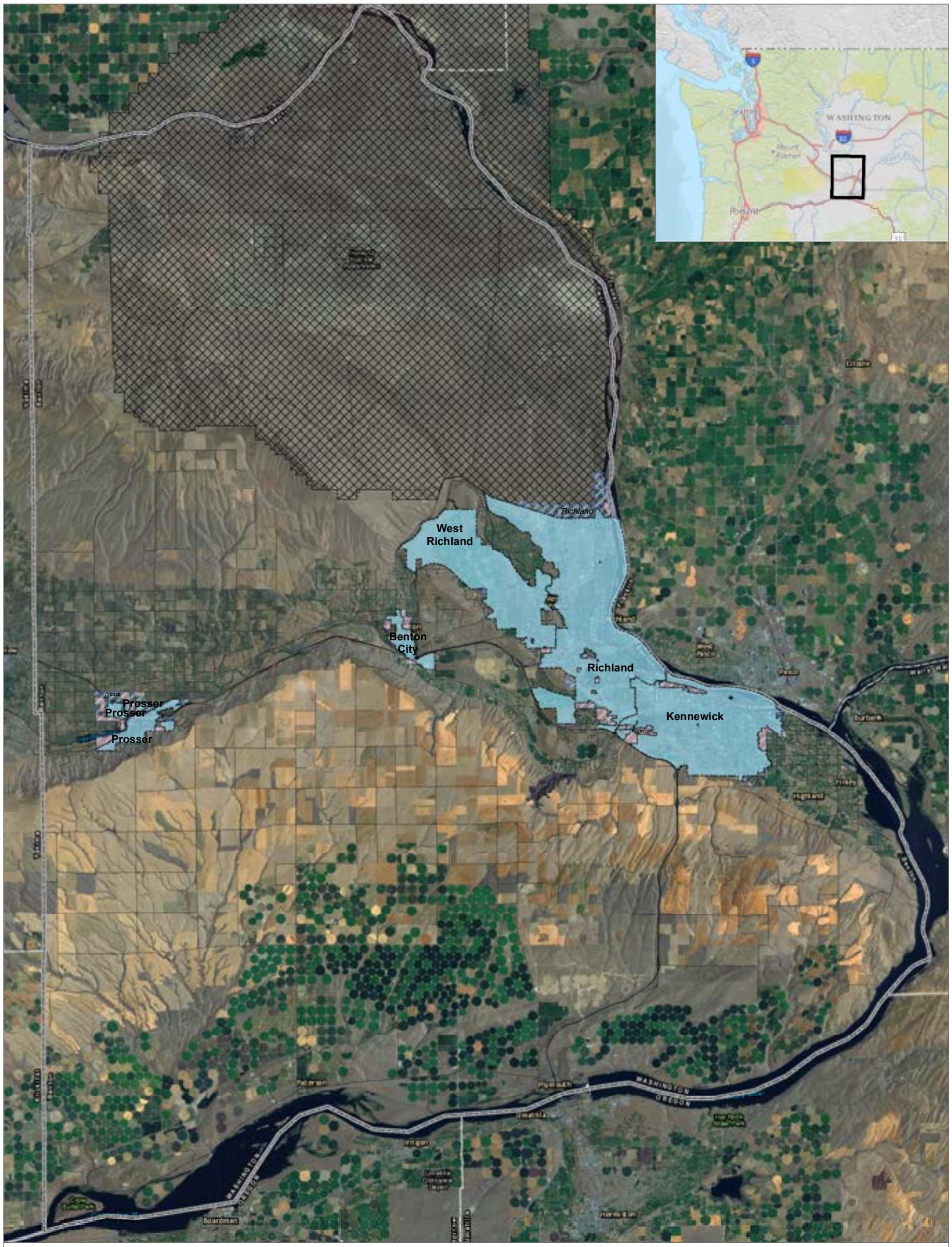
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Figure 1
Existing Designated Agricultural Resource Lands and City Planning Areas
Benton County
Agricultural Resource Land Reclassification



LEGEND:

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

Land Use (2011)

District

- UGA

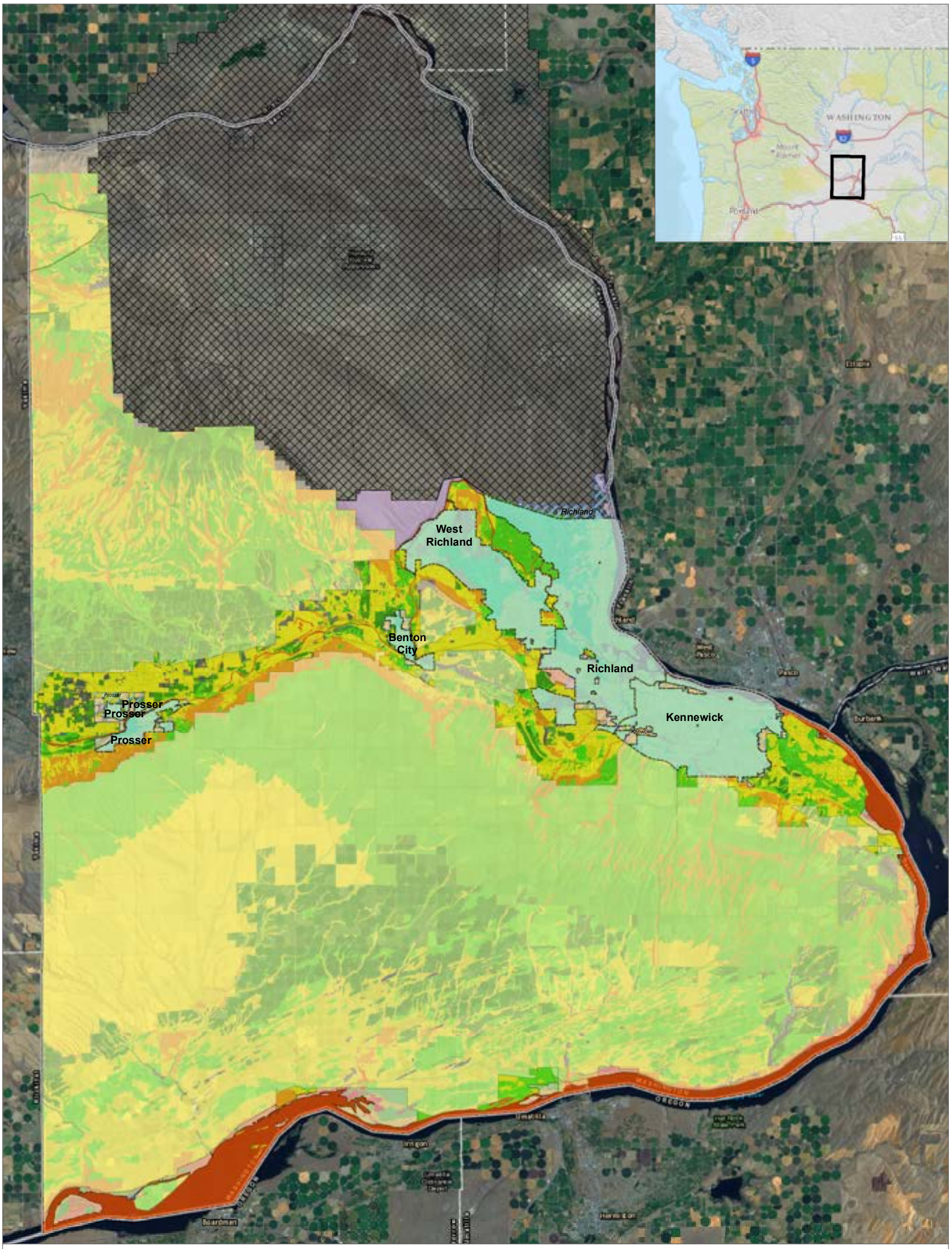
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Figure 2
Urban Growth Areas
Benton County
Agricultural Resource Land Reclassification



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

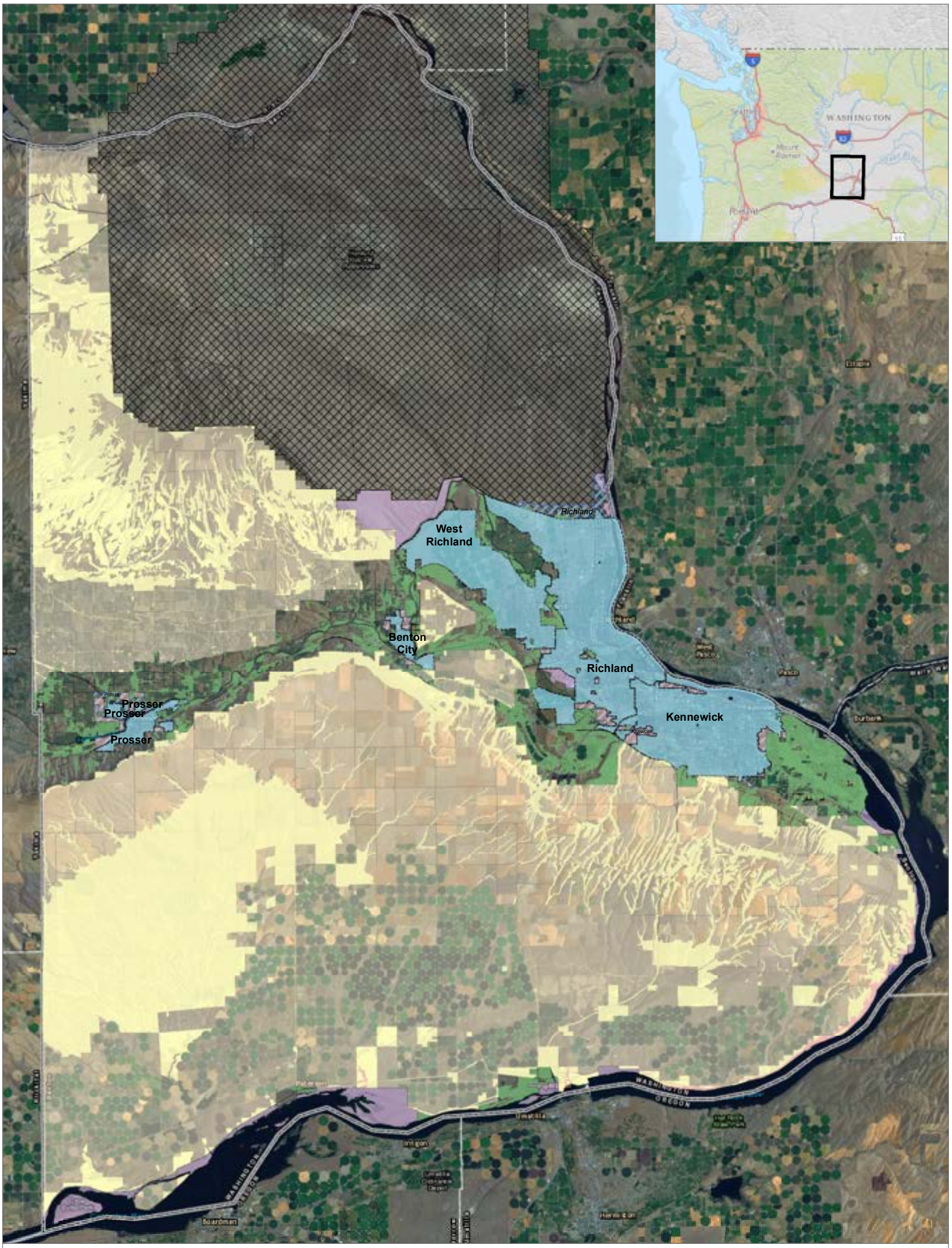
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Figure 3
NRCS Capability Class
Benton County
Agricultural Resource Land Reclassification



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

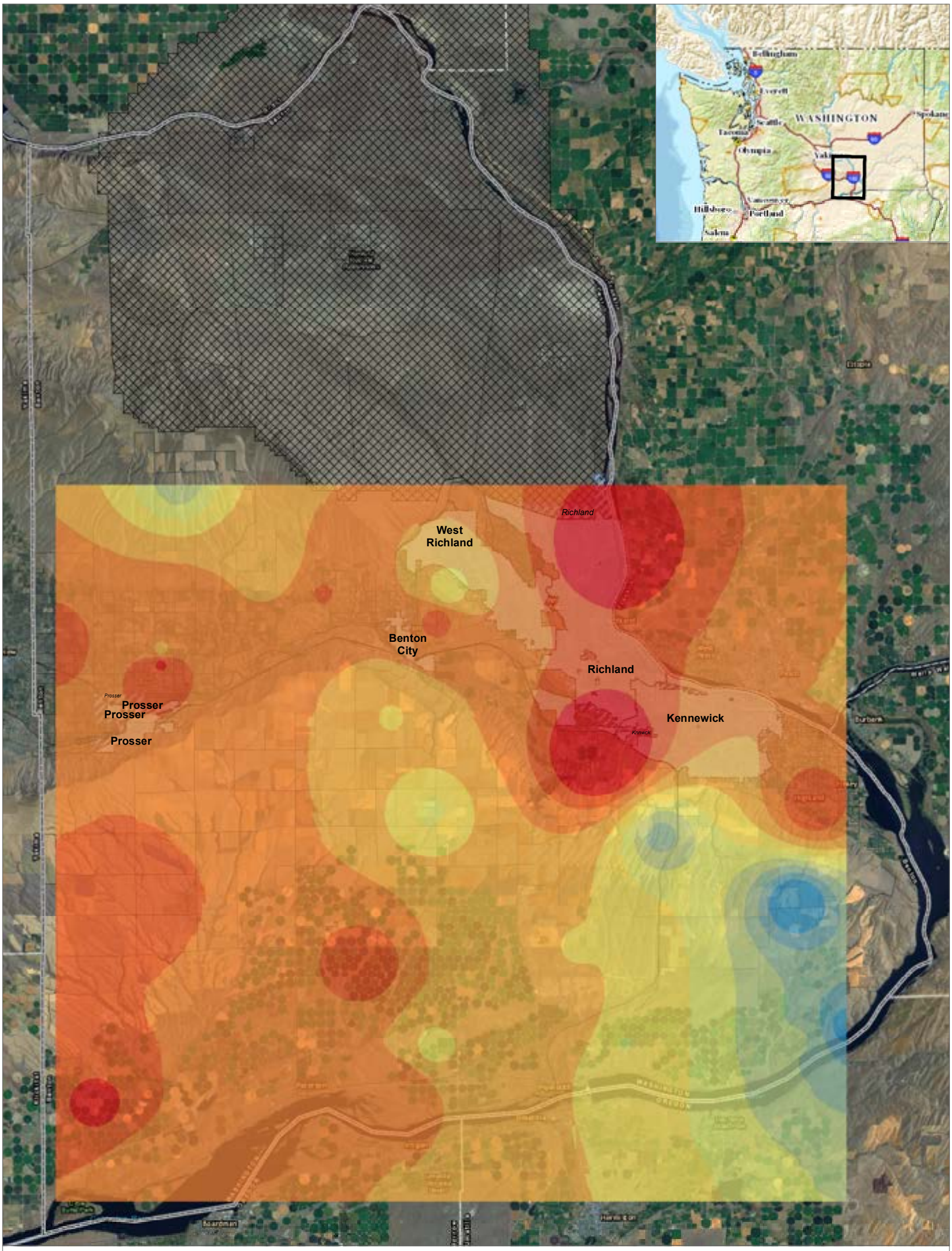
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Figure 4
Capability/Land Use Potential Mismatch Areas
Benton County
Agricultural Resource Land Reclassification

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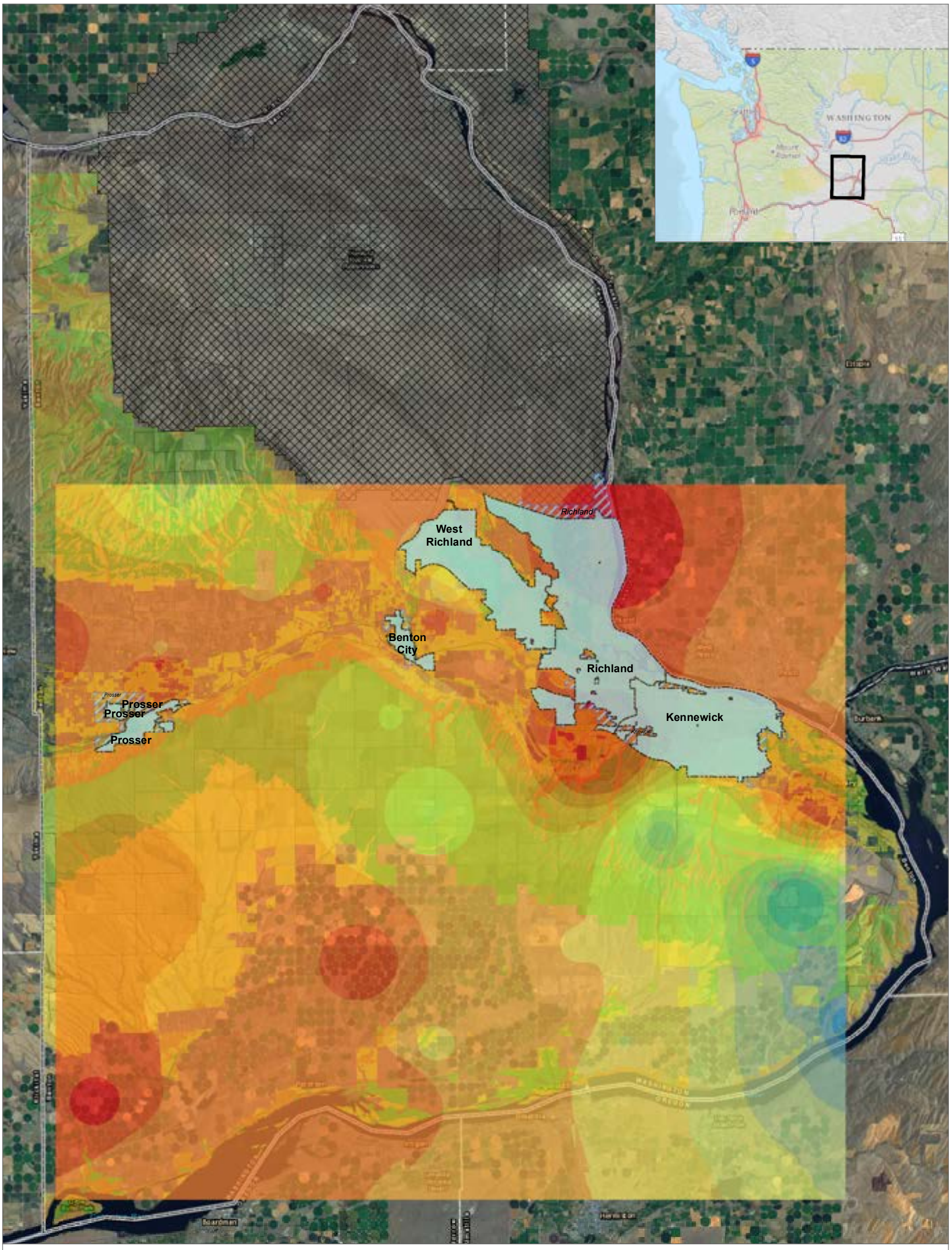


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Figure 5
Annual Average Precipitation Analysis
Benton County
Agricultural Resource Land Reclassification

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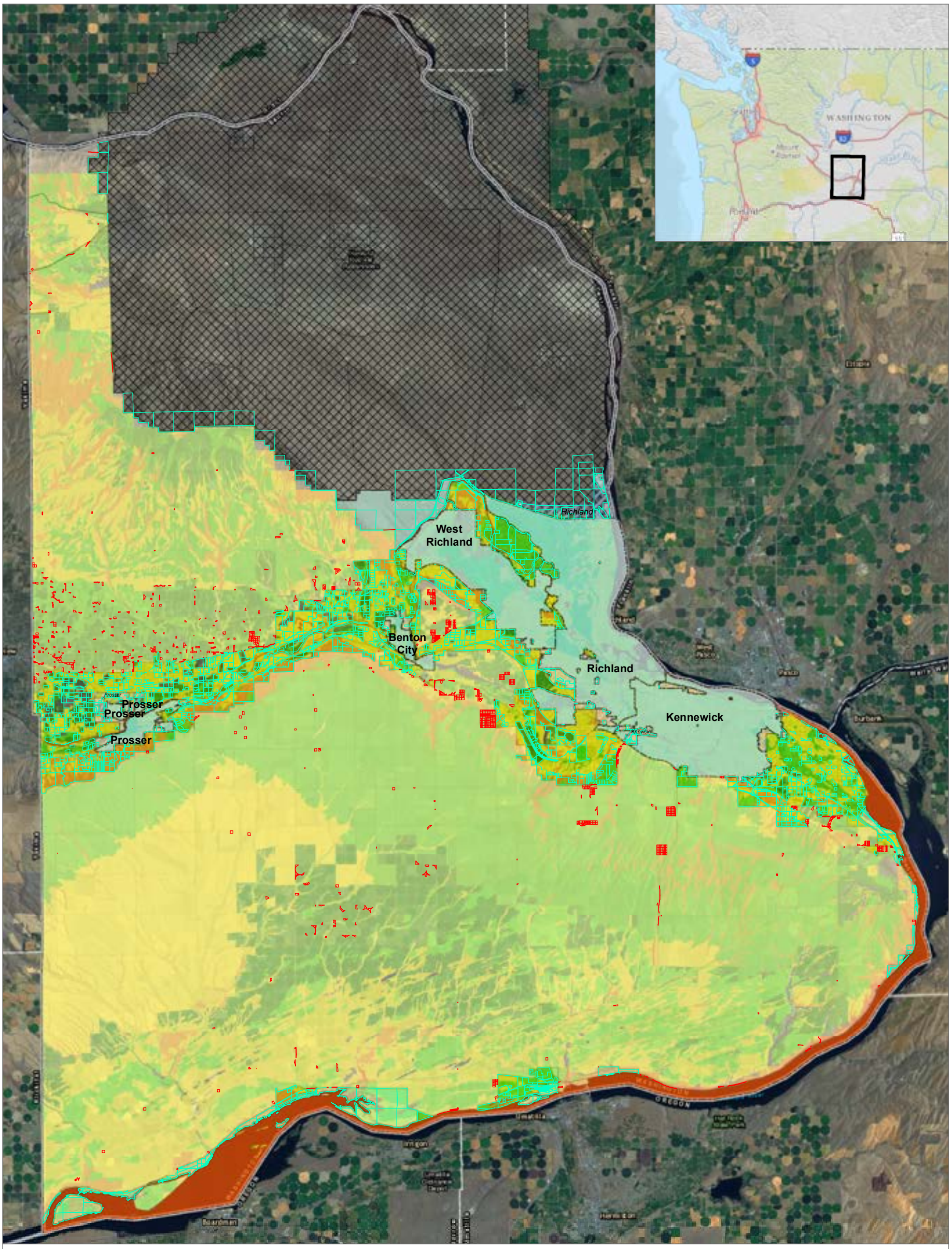


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Figure 6
Precipitation and Non-irrigated Lands Suitable for Cultivation
Benton County
Agricultural Resource Land Reclassification

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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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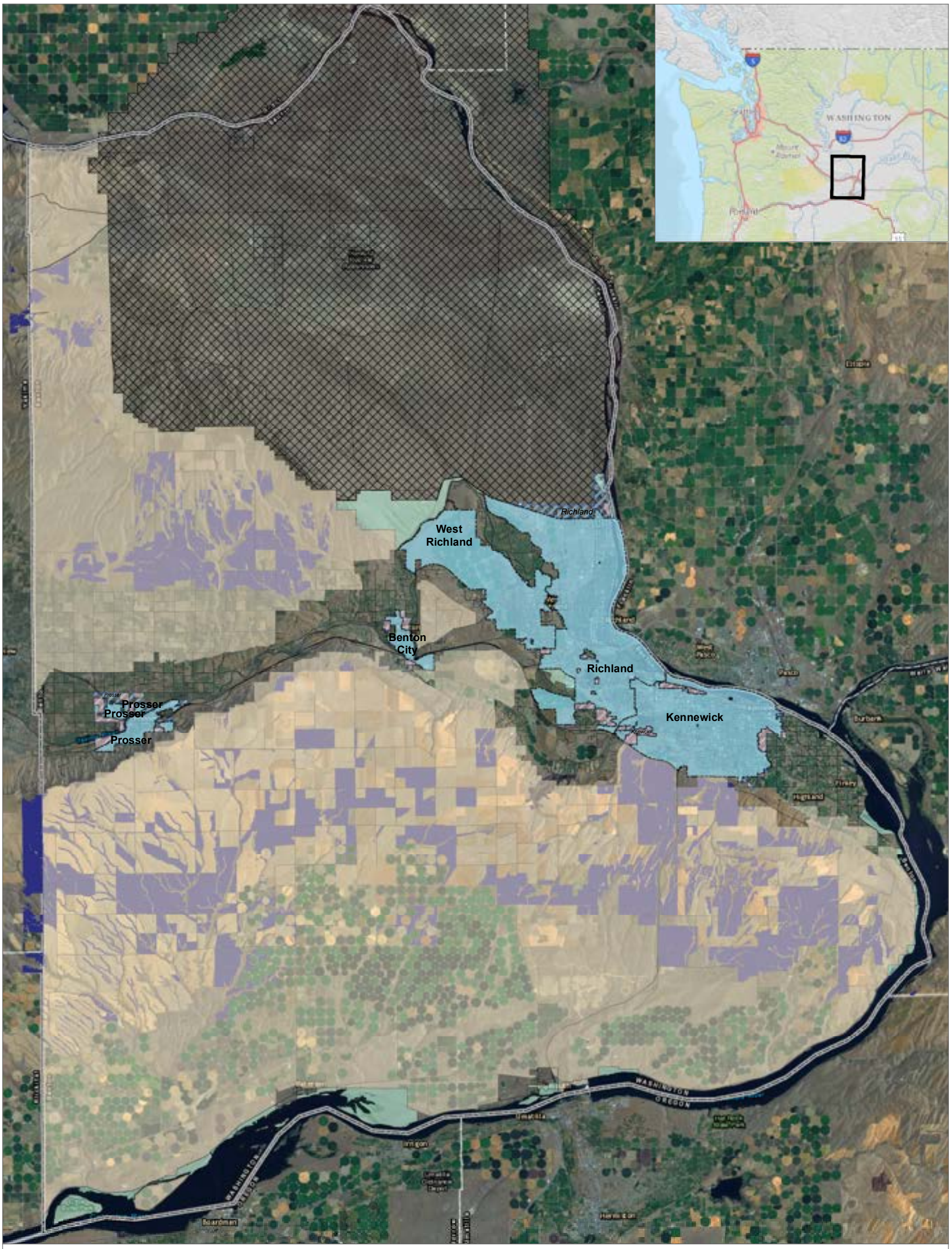
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Figure 7
Parcel Size Analysis
Benton County
Agricultural Resource Land Reclassification

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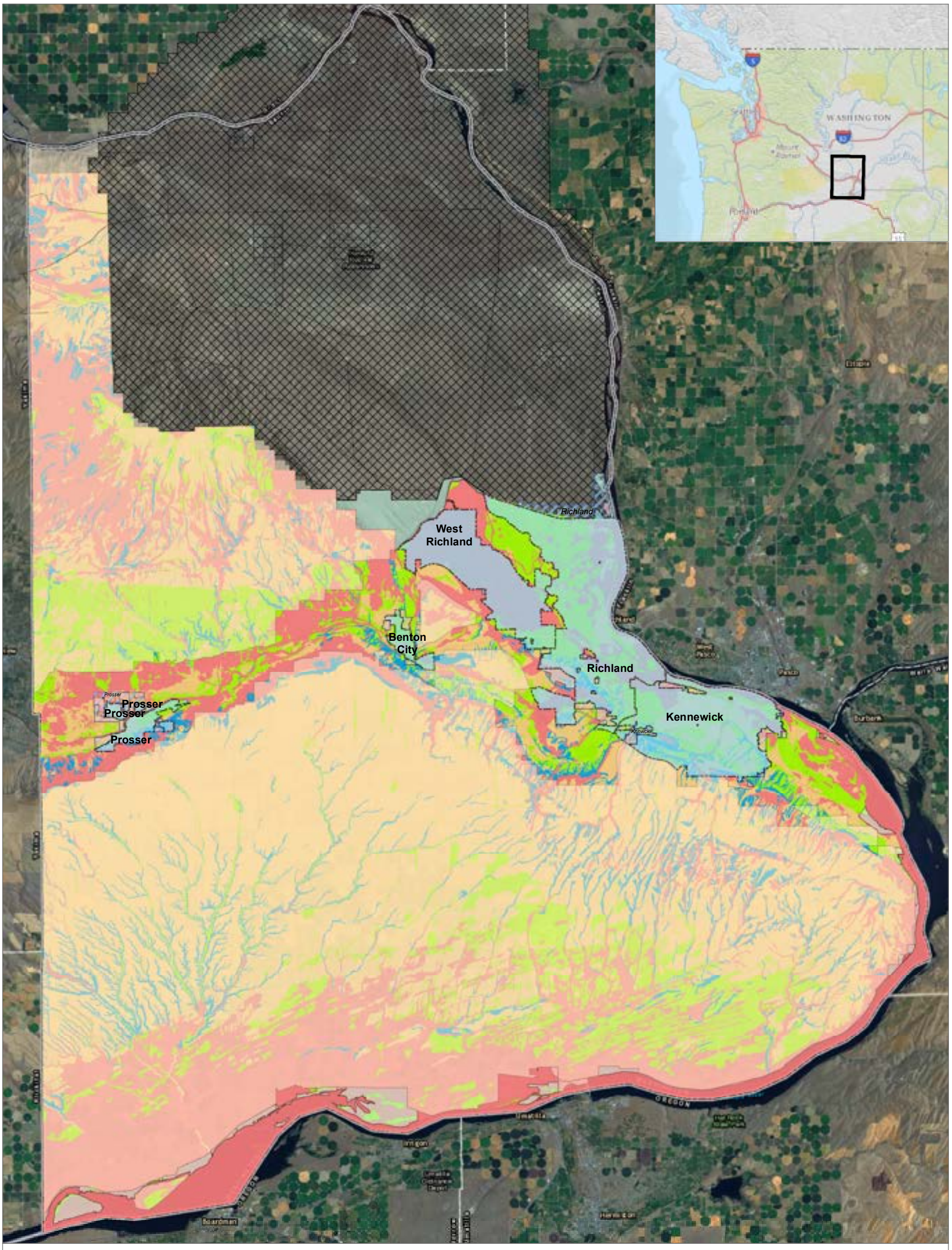
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Figure 8
Lands in CRP/Conservation
Benton County
Agricultural Resource Land Reclassification

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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

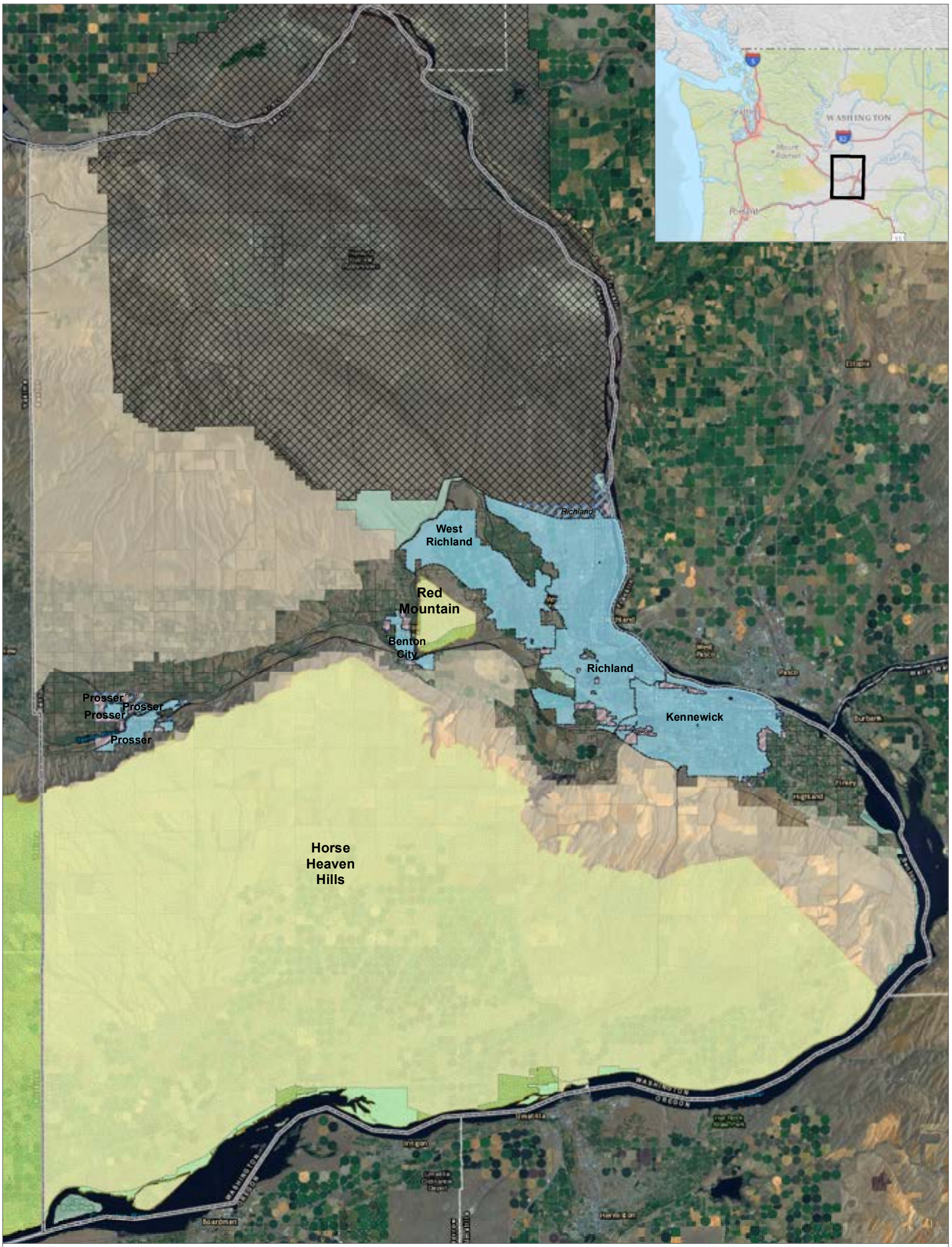
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Figure 9
Prime Farmland Designation
Benton County
Agricultural Resource Land Reclassification

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LEGEND:

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

Land Use (2011)

District

- PARK DISTRICT
- UGA
- GMA AG

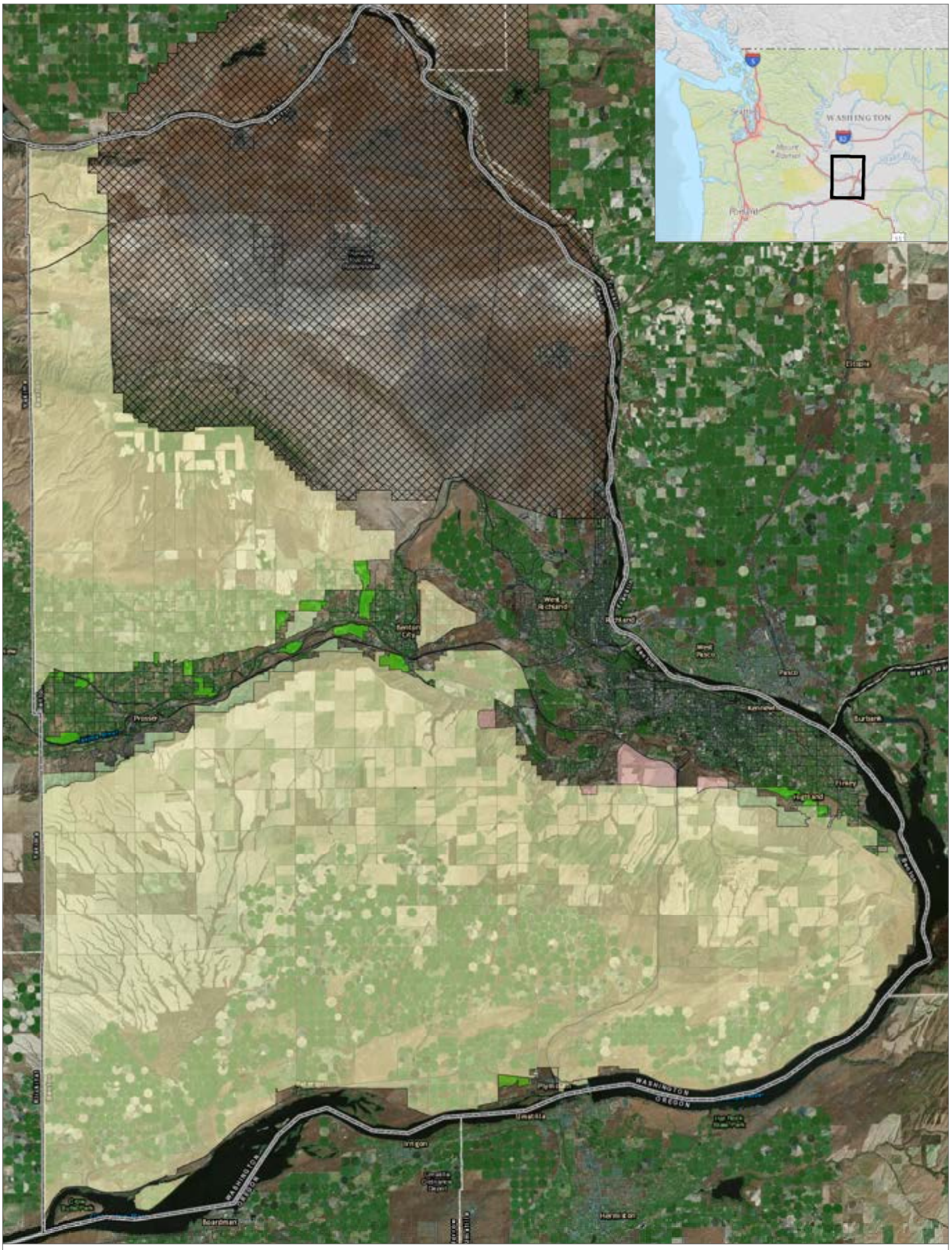
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Figure 10
American Viticultural Areas
Benton County
Agricultural Resource Land Reclassification

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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

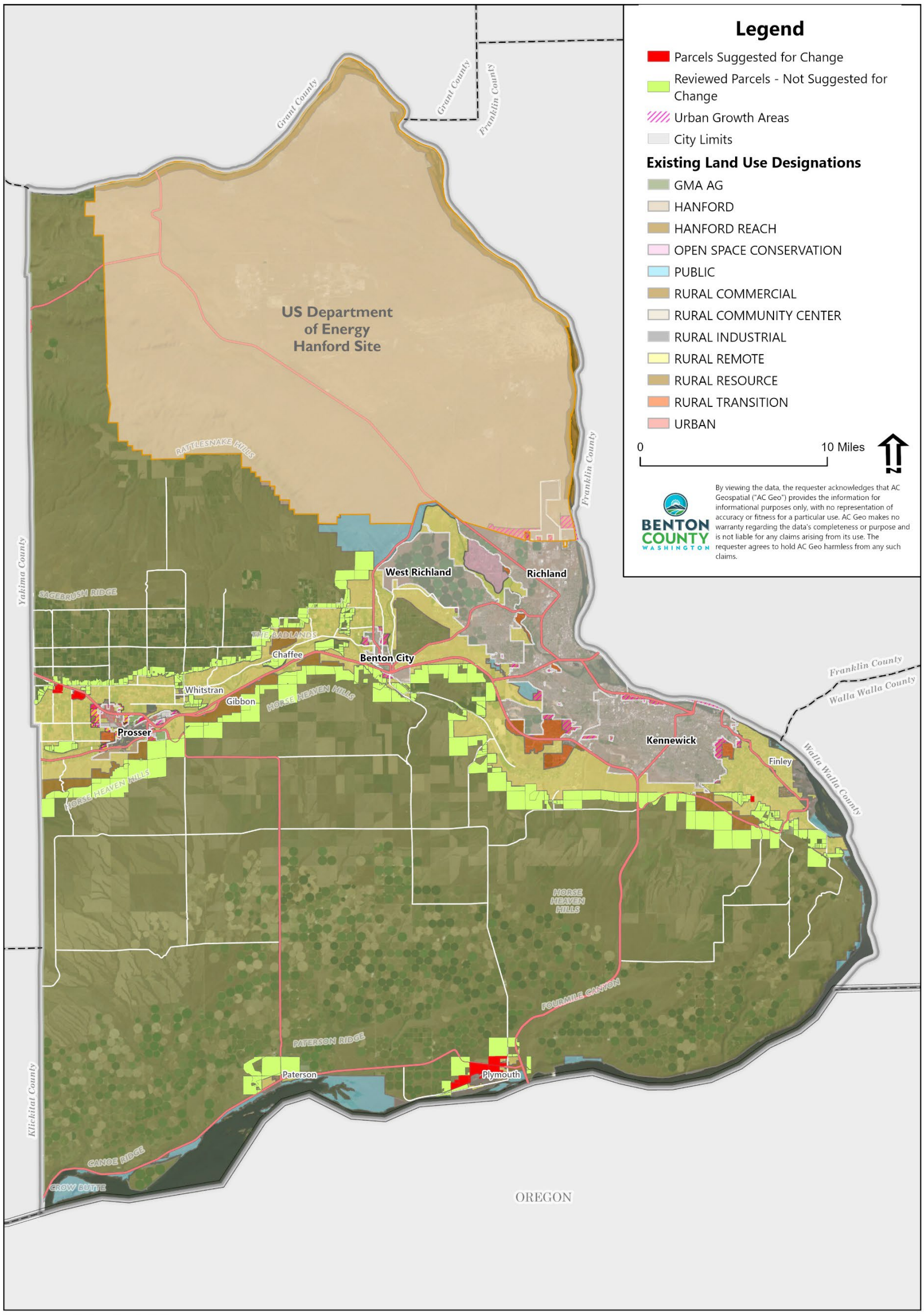
The review identified **16 parcels** currently designated GMA Agriculture where alternative designations may be more appropriate due to limited agricultural suitability and likelihood of being agricultural lands of long-term commercial significance. These parcels are recommended for re-designation to 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

Re: Industrial Lands Inventory

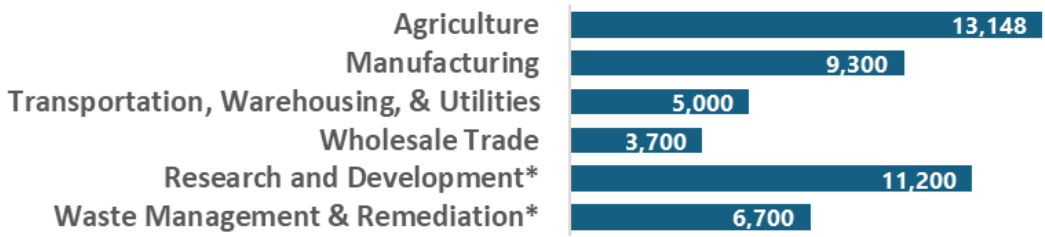
Introduction

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.

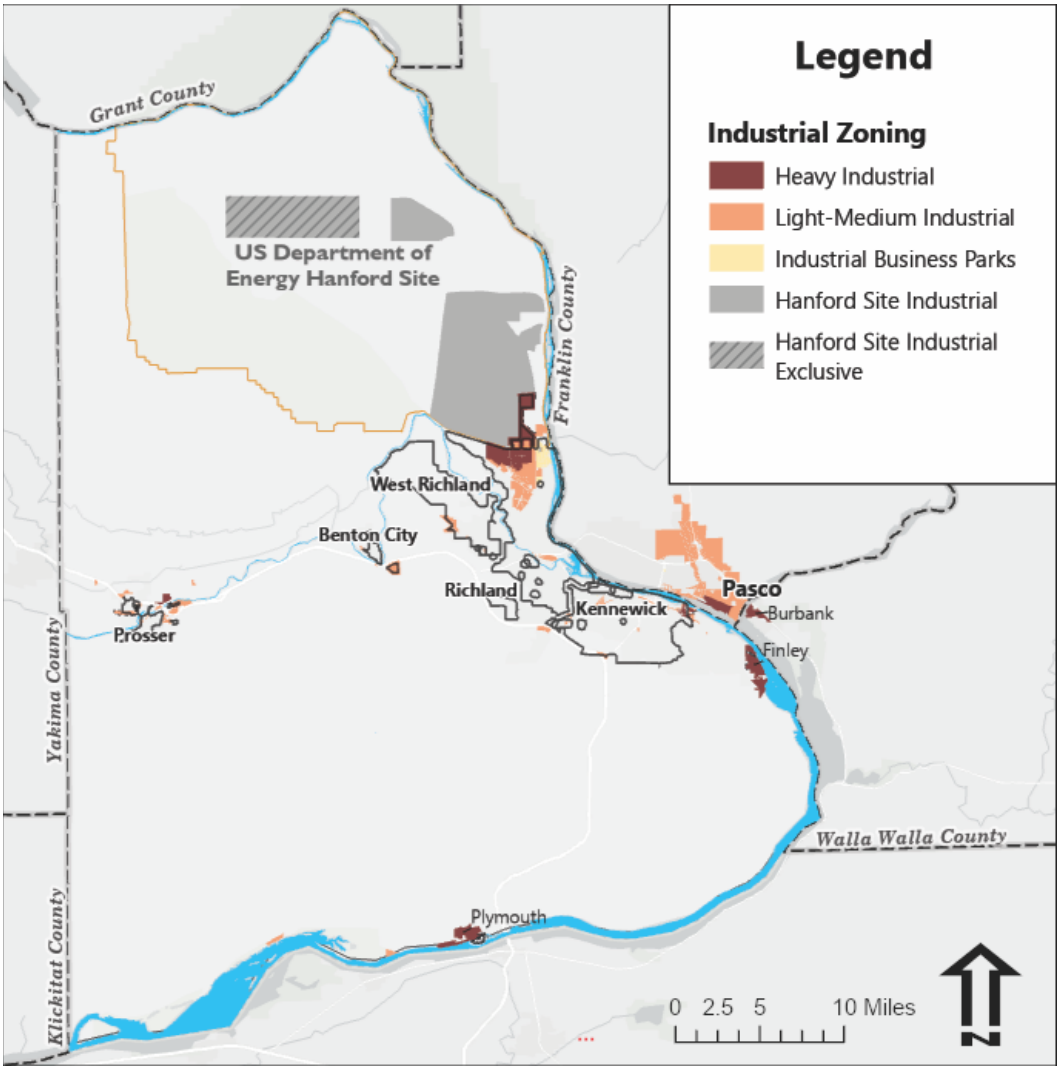
[1] U.S. Census Bureau County Business Patterns, 2022
[2] US Department of Energy Request for Information on Artificial Intelligence Infrastructure
[3] Port of Benton, *Rail Intermodal Facility Projects*, 2025

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 publicly owned 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.

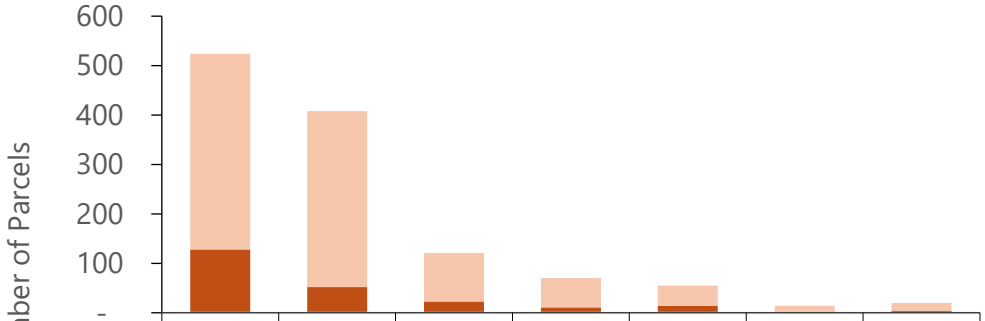
Significant industrial lands exist within the unincorporated areas of Benton County and several of the incorporated cities. Richland has approximately 6,860 acres of industrial zoned land, with large acreages in both public and private ownership. The North Horn Rapids Industrial Park (Northwest Advanced 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 with public ownership, particularly within and adjacent to the Hanford Site. 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	1,193	227	666
Kennewick	65	101	100
Richland	1,768	504	125
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	100+ acres	50-100 acres	20-50 acres	10-20 acres	5-10 acres	Total
Benton County	470	141	366	58	158	1,193
Kennewick				47	18	65
Richland	1,135	67	366	105	95	1,768
West Richland	134		111	98	37	380
Benton City						0
Prosser				25	18	43
Pasco	293	134	318	219	190	1,154
Burbank UGA	133		24	25		182
Total	**2,163**	**341**	**1,185**	**578**	**516**	**4,784**

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

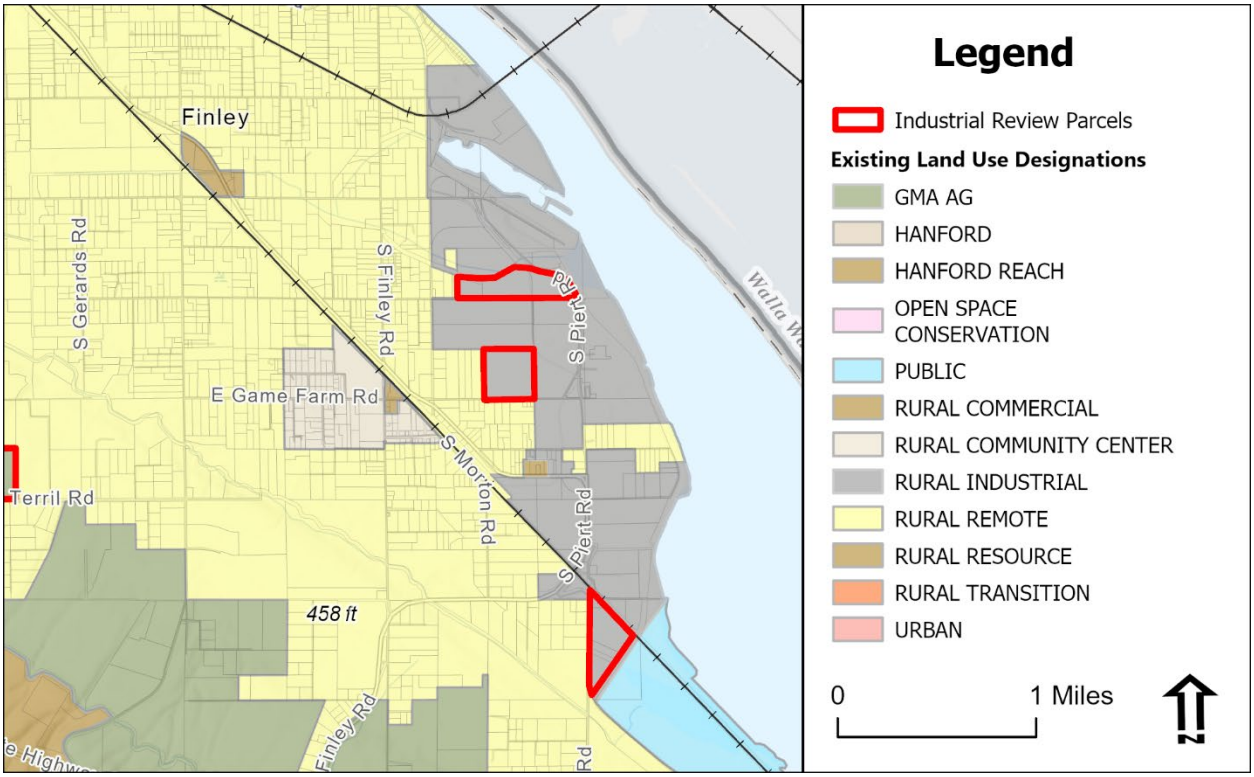
The unincorporated area of Finley is a longstanding industrial area with several large industrial sites with multimodal transport access. There is a cluster of older fertilizer and chemical plants that were established in the 1950s-60s, some of which have been redeveloped and support ongoing use (Port 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



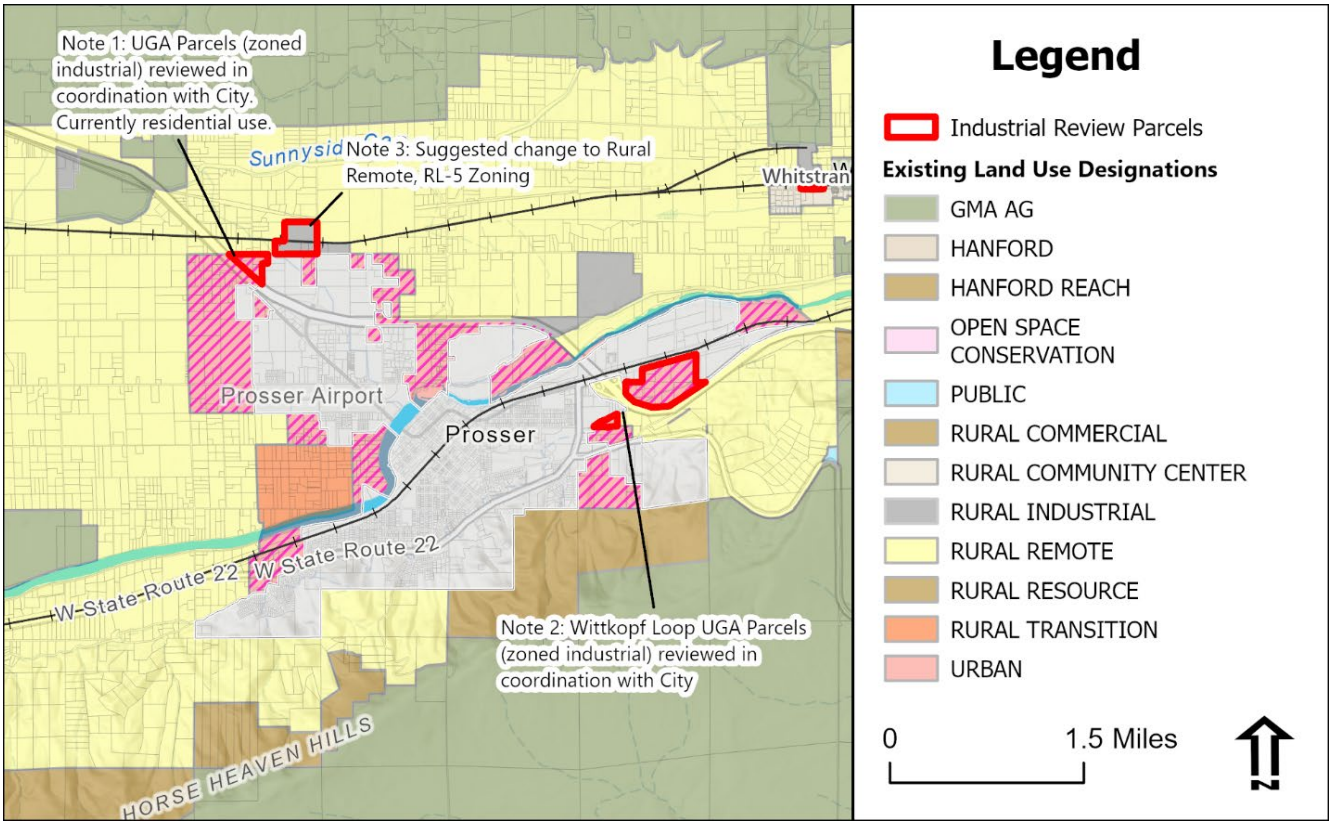
Designation changes for the selected parcels in Finley were further discussed with County planning staff, and, where appropriate, the Port of Kennewick. The discussions identified that although these parcels are not currently developed, they buffer more intensive industrial uses and may also be suitable 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

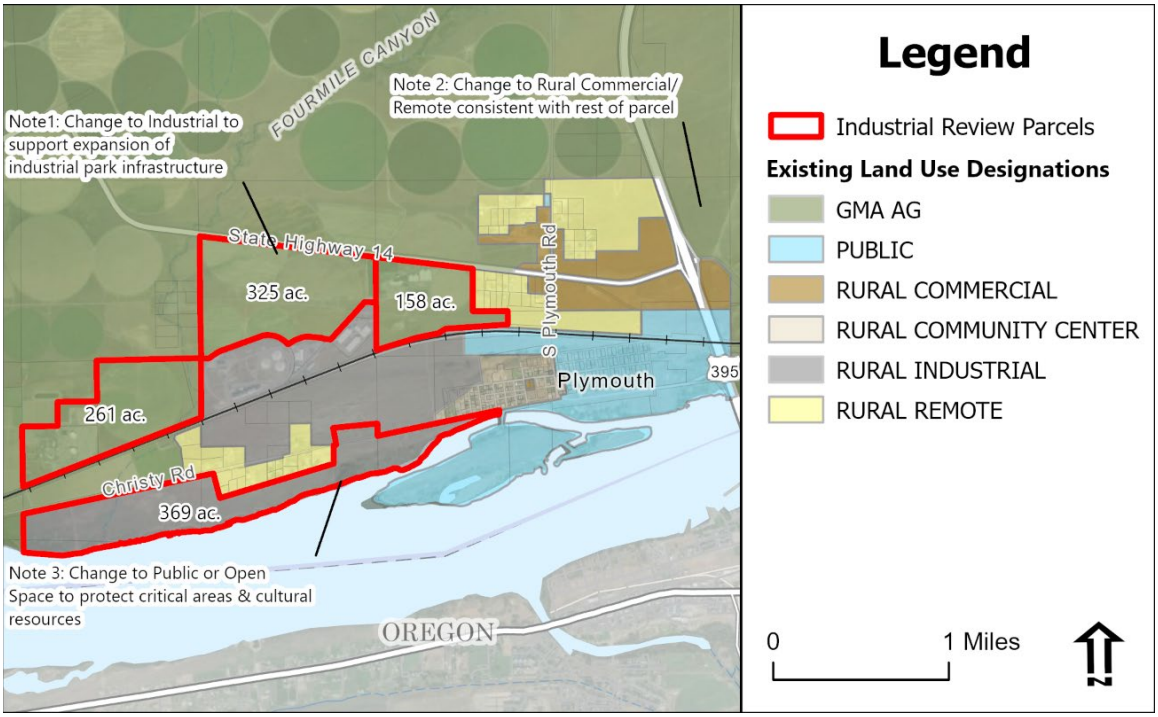
Plymouth has approximately 773 acres of land designated as industrial and has an existing industrial park focused on bulk processing, handling, and storage of agricultural products. The site has river, rail, and highway access, and proximity to Umatilla, Oregon, making it a hub for processing and distribution 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

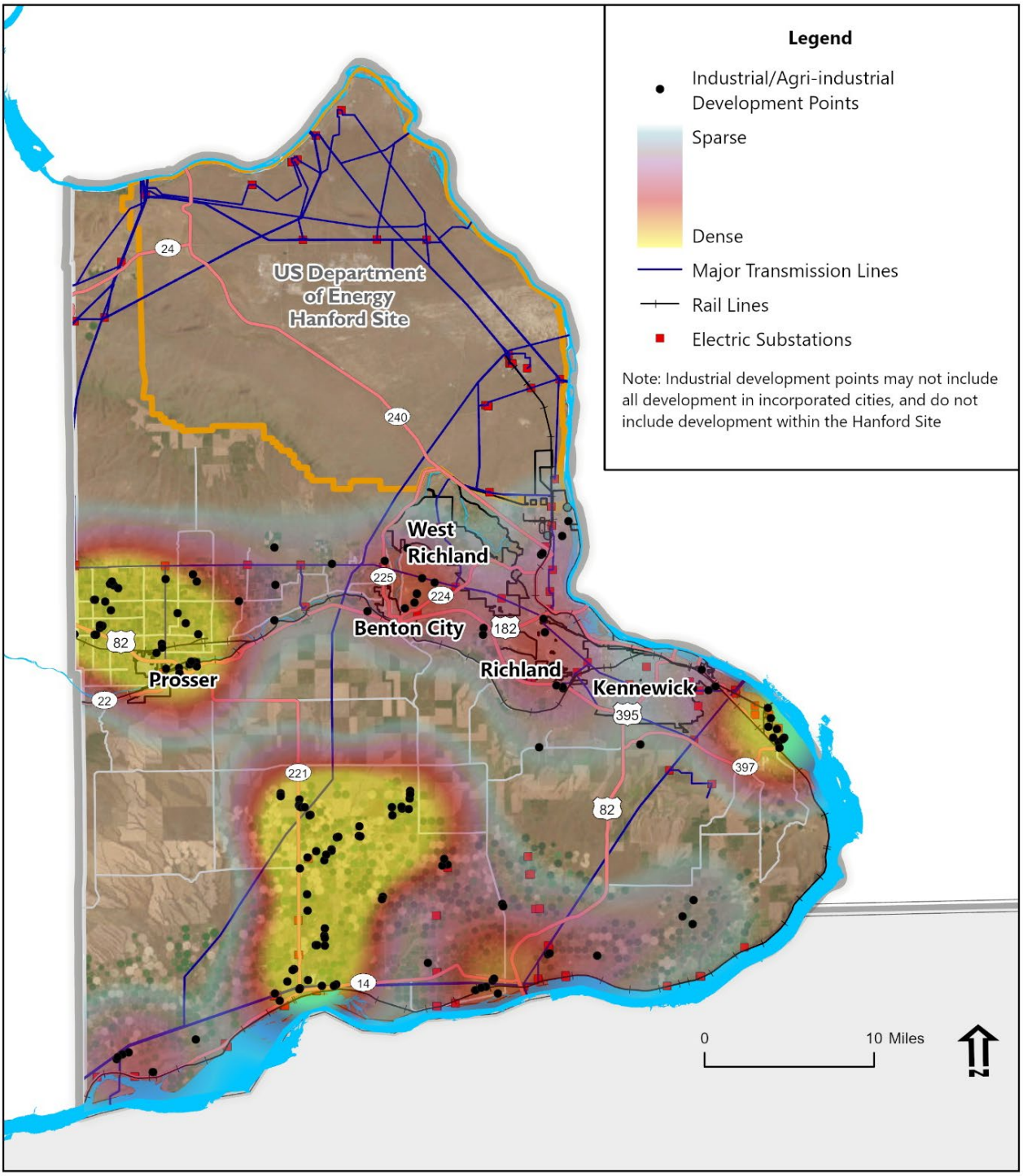
In many areas of Benton County, agriculture-related and supporting industrial uses often occur outside of designated industrial zones, particularly within the GMA Agriculture District. While these uses may be directly tied to agricultural production, their scale and intensity increasingly resemble industrial 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 attached as Appendix A. 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.

References

American Farmland Trust. (2019). *Smart Solar Siting Principles and Examples of Local Solar Laws that Protect Farmland.*

American Planning Association. (2023). *Solar at Scale Guidebook (V3).*

Benton County, Washington. (2018). *Benton County Code Chapter 11.03.010, pg 28 – 32.*

Benton County. (2017). *Benton County Comprehensive Plan.*

Clean Power. (2023). *Storage Siting and Permitting: Recommendations for States.*

Grant County, Washington. (2024). *Unified Development Code - Title 23 Zoning*, 23.08.357 – Solar Energy Facility.

Grow Solar. (2015). *Model Ordinances for Sustainable County Development.*

Hill, Adam, & Floyd, Benjamin. (2018, January 1). *Memorandum: Agricultural resource land reclassification*. Benton County Planning Department.

National Renewable Energy Laboratory (NREL). (2024). *County Land-Use Regulations for Solar Energy Development in Colorado.*

Ross, B., & Vadali, M. (2024). *Battery Energy Storage Systems.* American Planning Association.

Solar Energy Industries Association (SEIA). (2025.). *Solar + Storage Dictionary*.

Solar Energy Industries Association (SEIA). (2019). *Solar and Agricultural Land Use Fact Sheet.*

Washington Department of Fish and Wildlife. (2023). *Washington Shrubsteppe Restoration and Resiliency Initiative.*

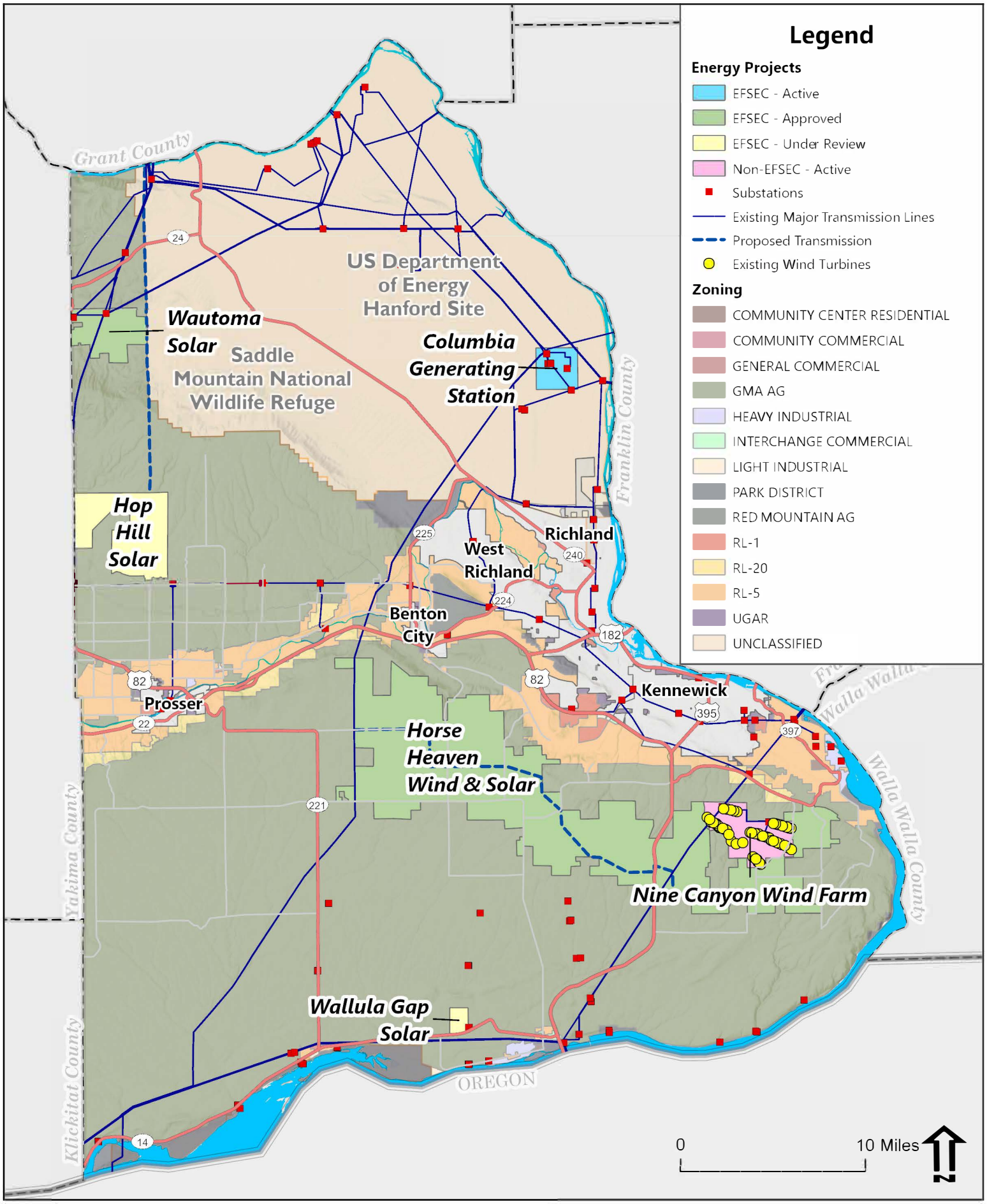
Washington Department of Fish and Wildlife (WDFW). (2025). Wind and Solar Siting Guidance: *Recommendations for Utility-Scale Renewable Energy Development in Washington State.*

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

Washington State University. (2023). *Dual-use Solar Opportunities.*

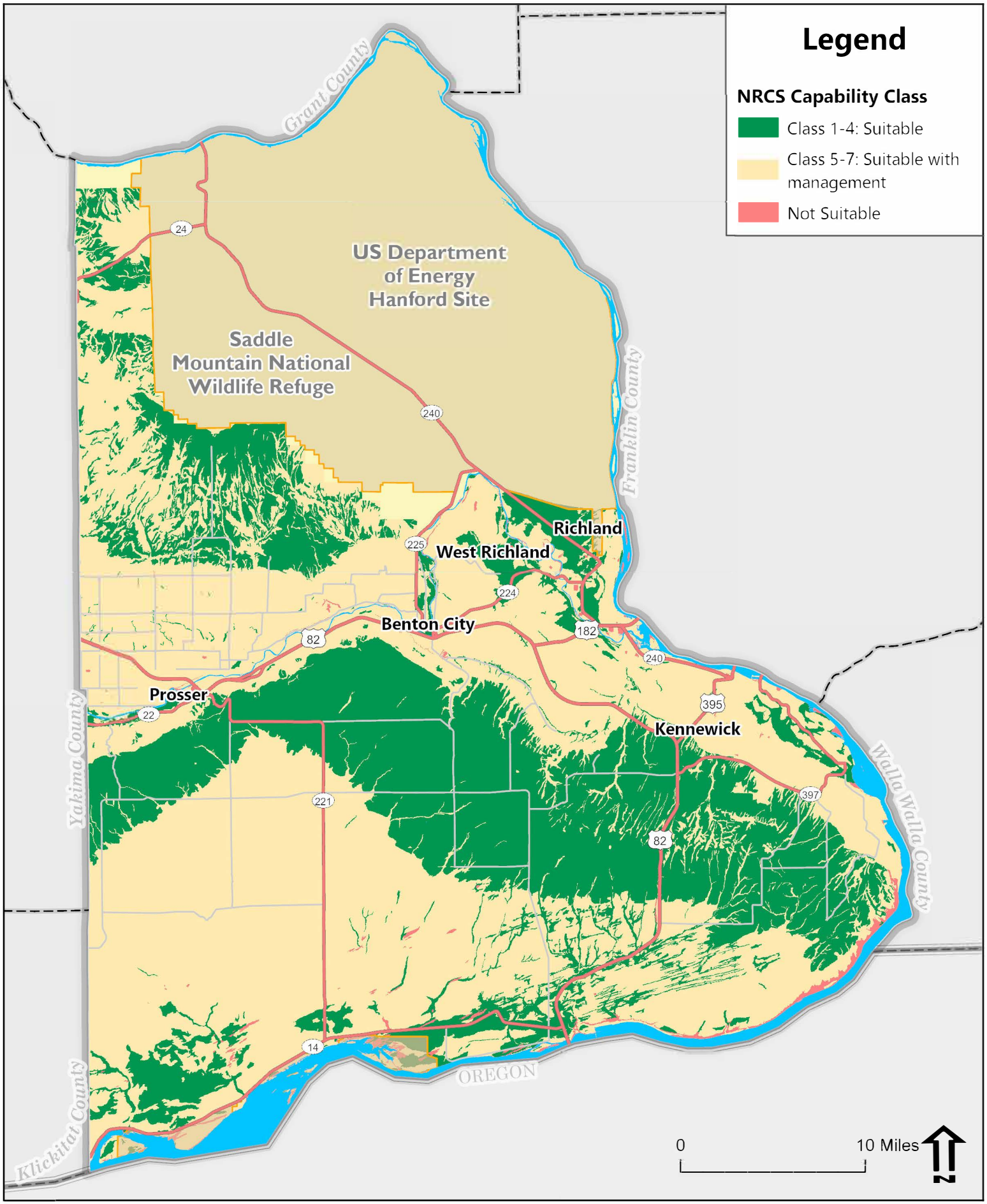
Washington State University Energy Program. (2023). *Least-conflict solar siting report.*

Appendix A
Energy Overlay Map Folio



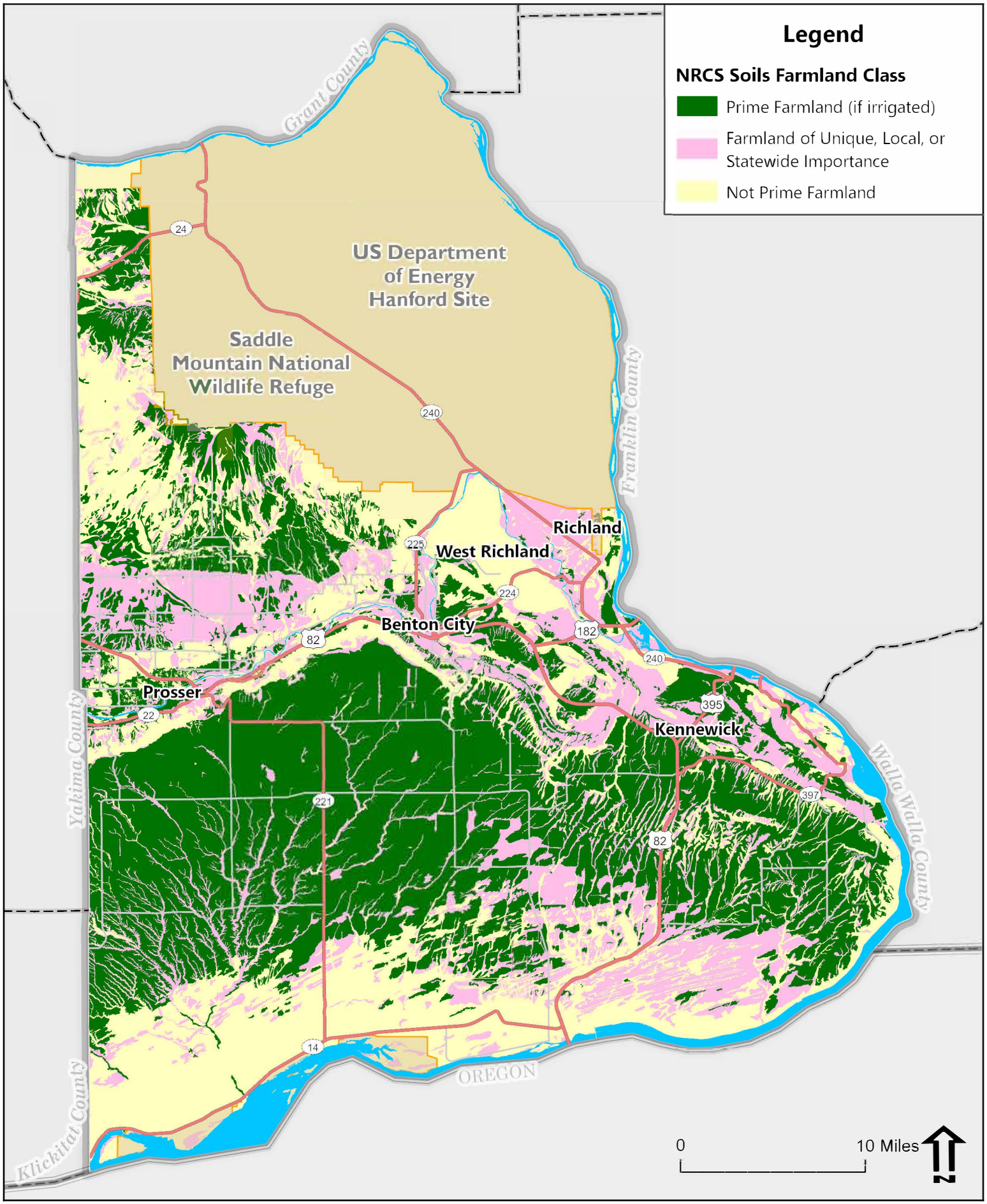
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Figure A-1
Energy Projects in Benton County



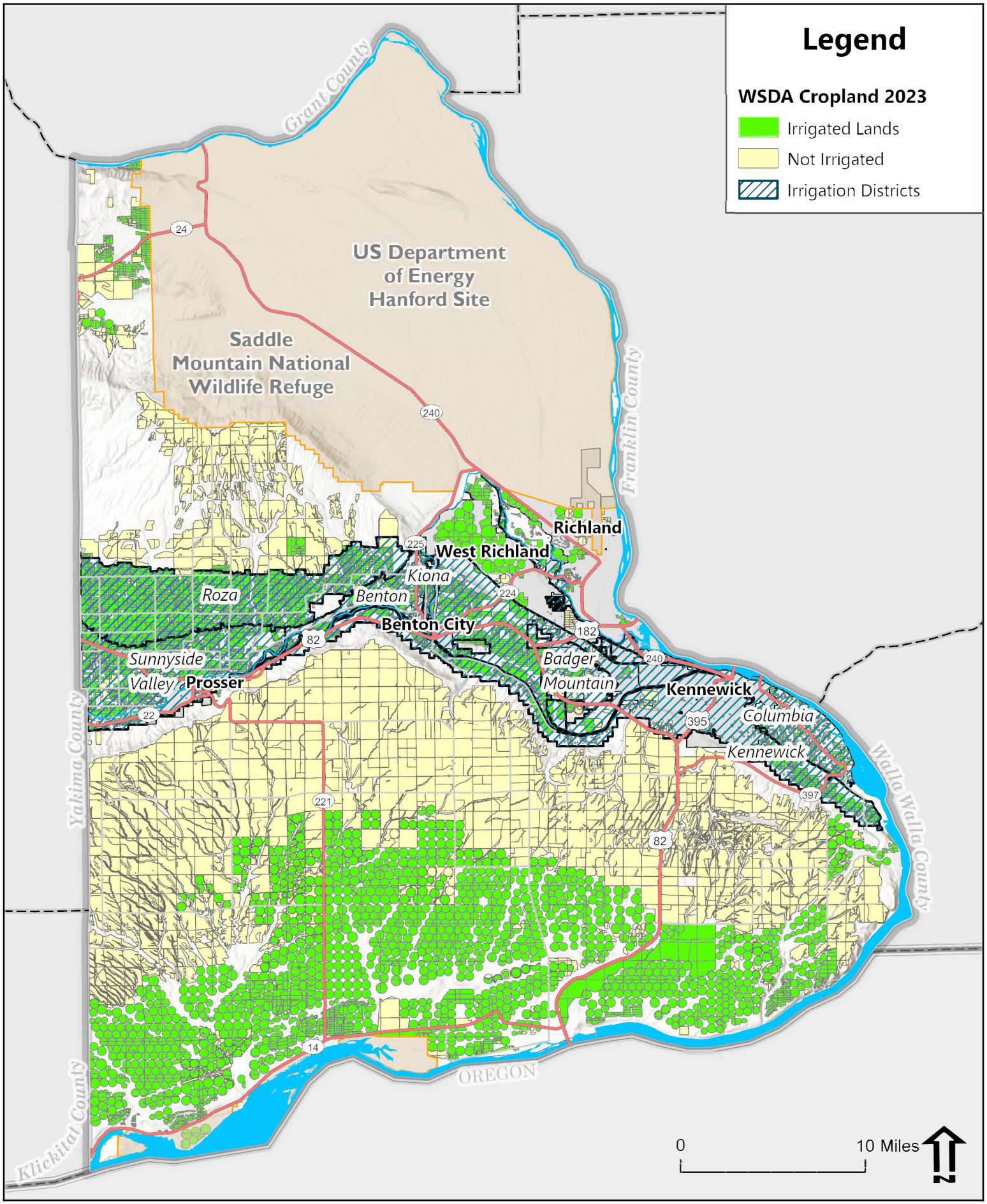
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Figure A-2
NRCS Land Capability Classes



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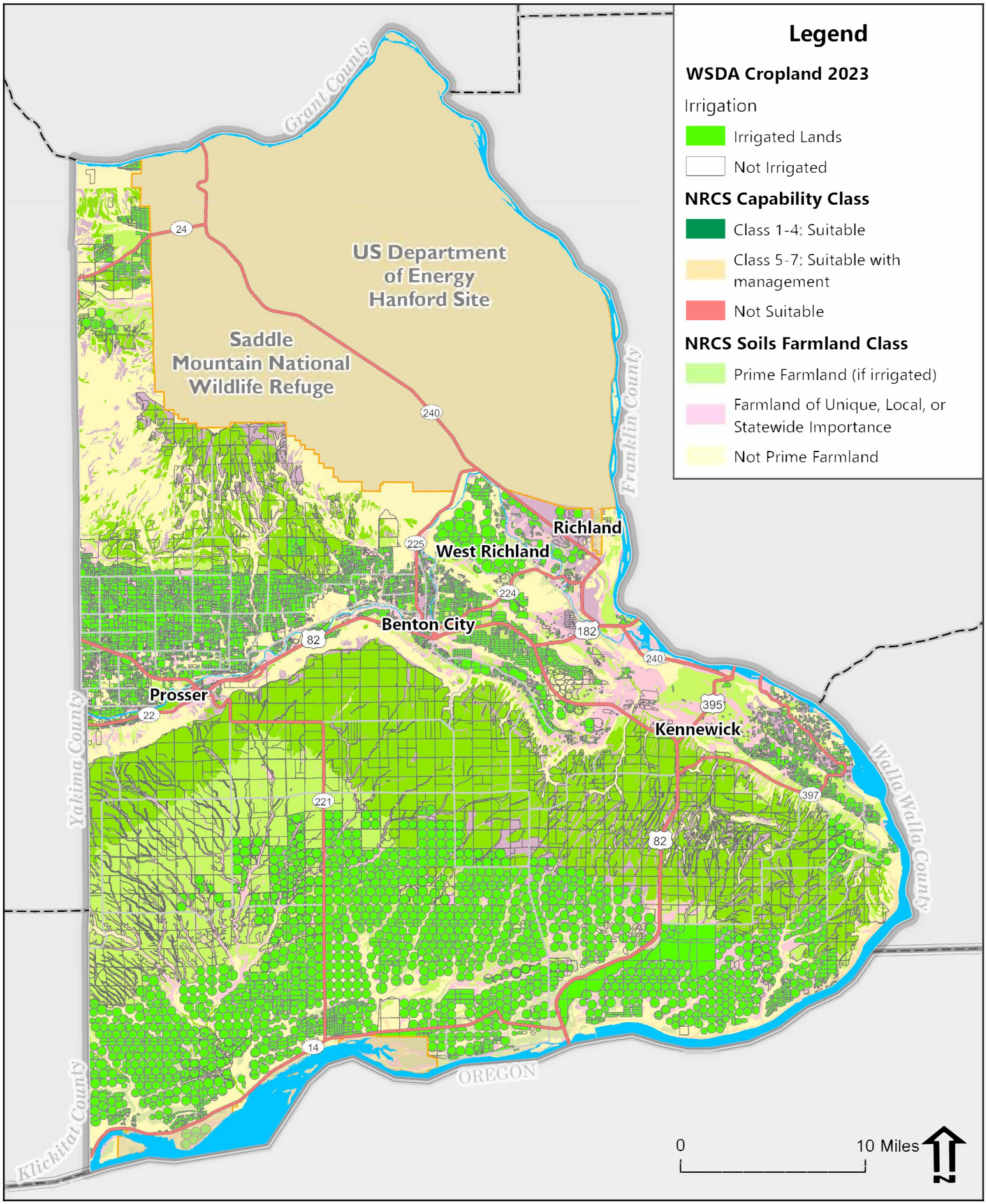
Figure A-3
NRCS Farmland Designations



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Figure A-4

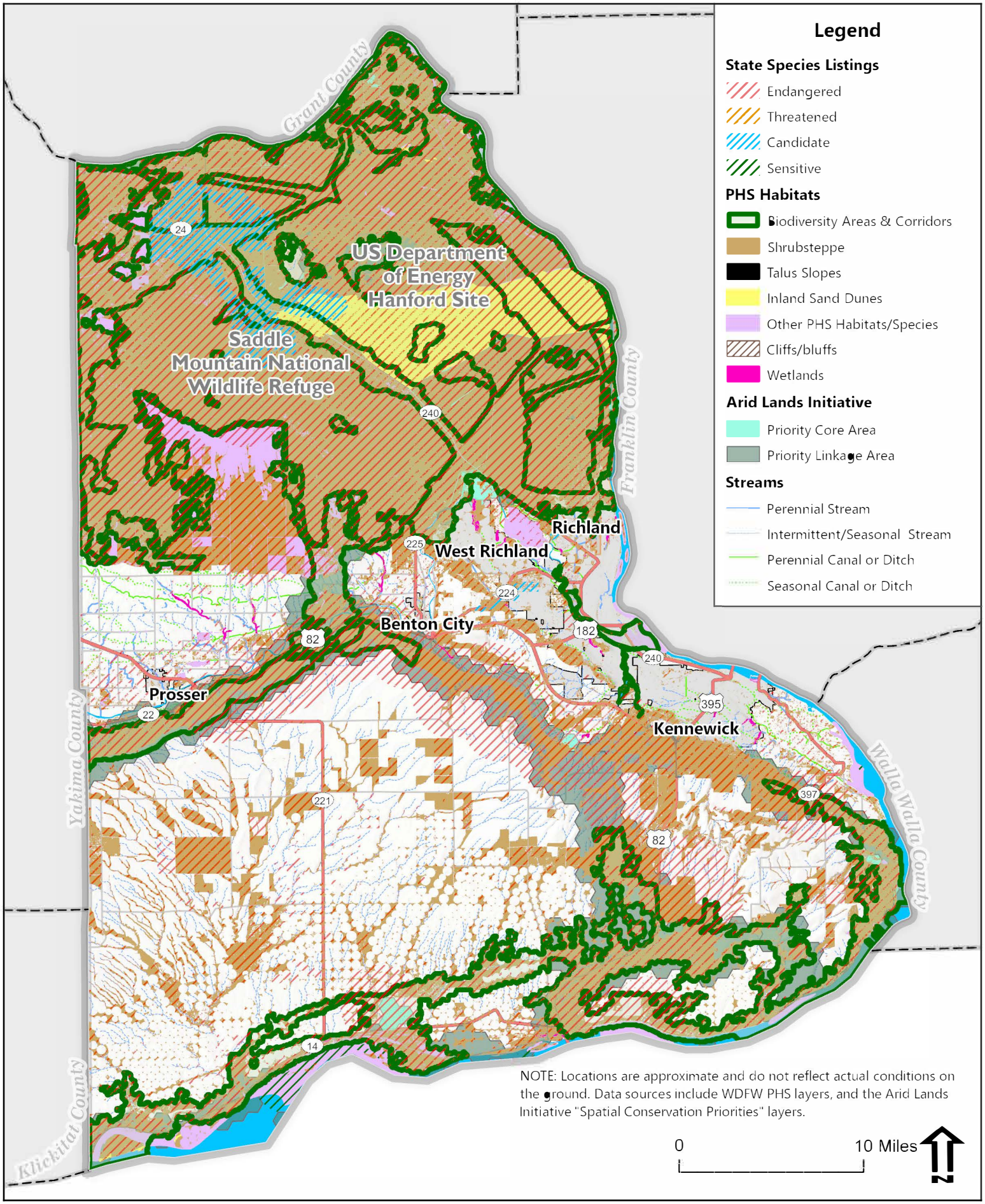
Irrigation Districts & WSDA Ag Lands



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Figure A-5

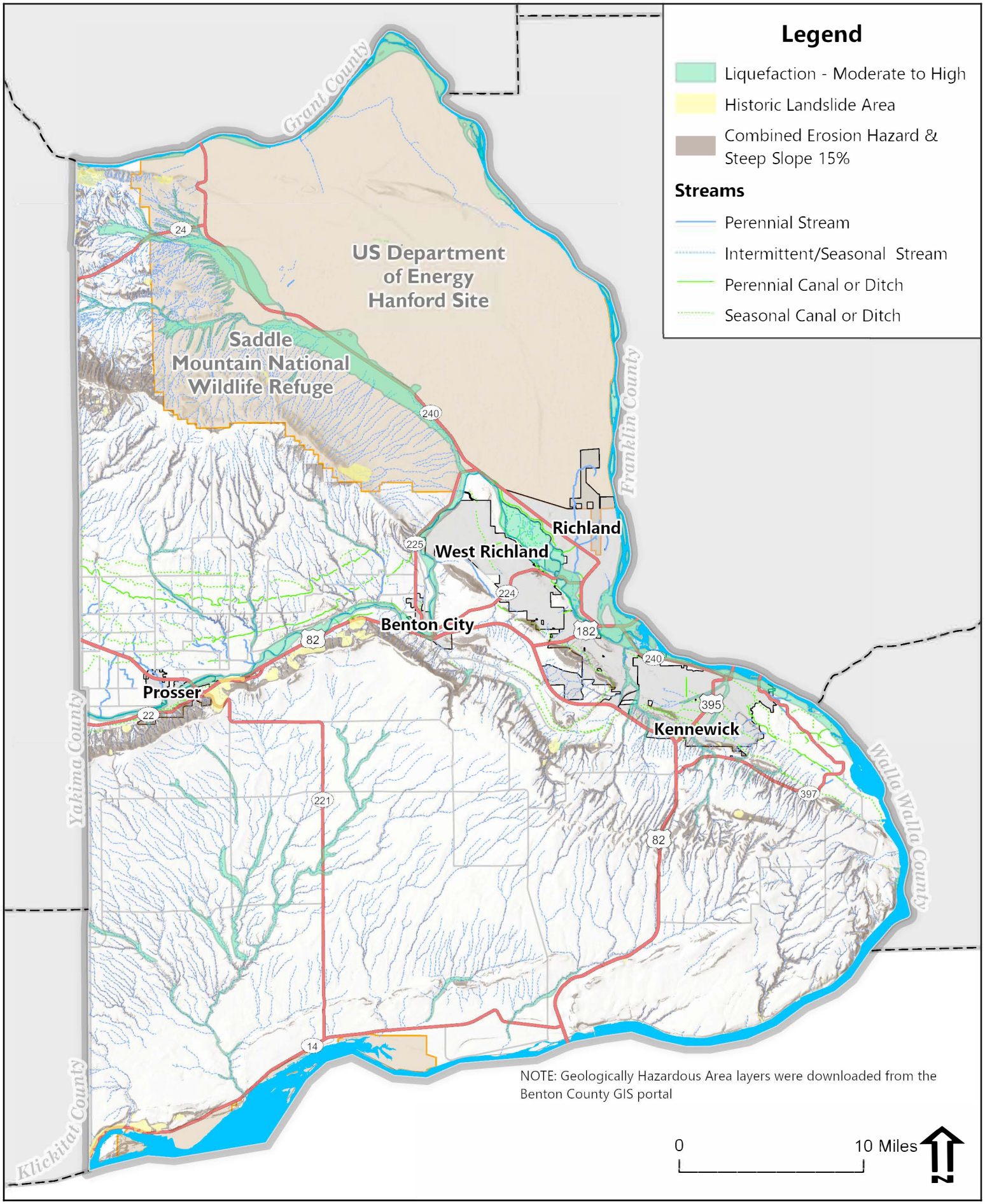
WSDA Ag Lands, NRCS Farmland & Soil Capability Classes



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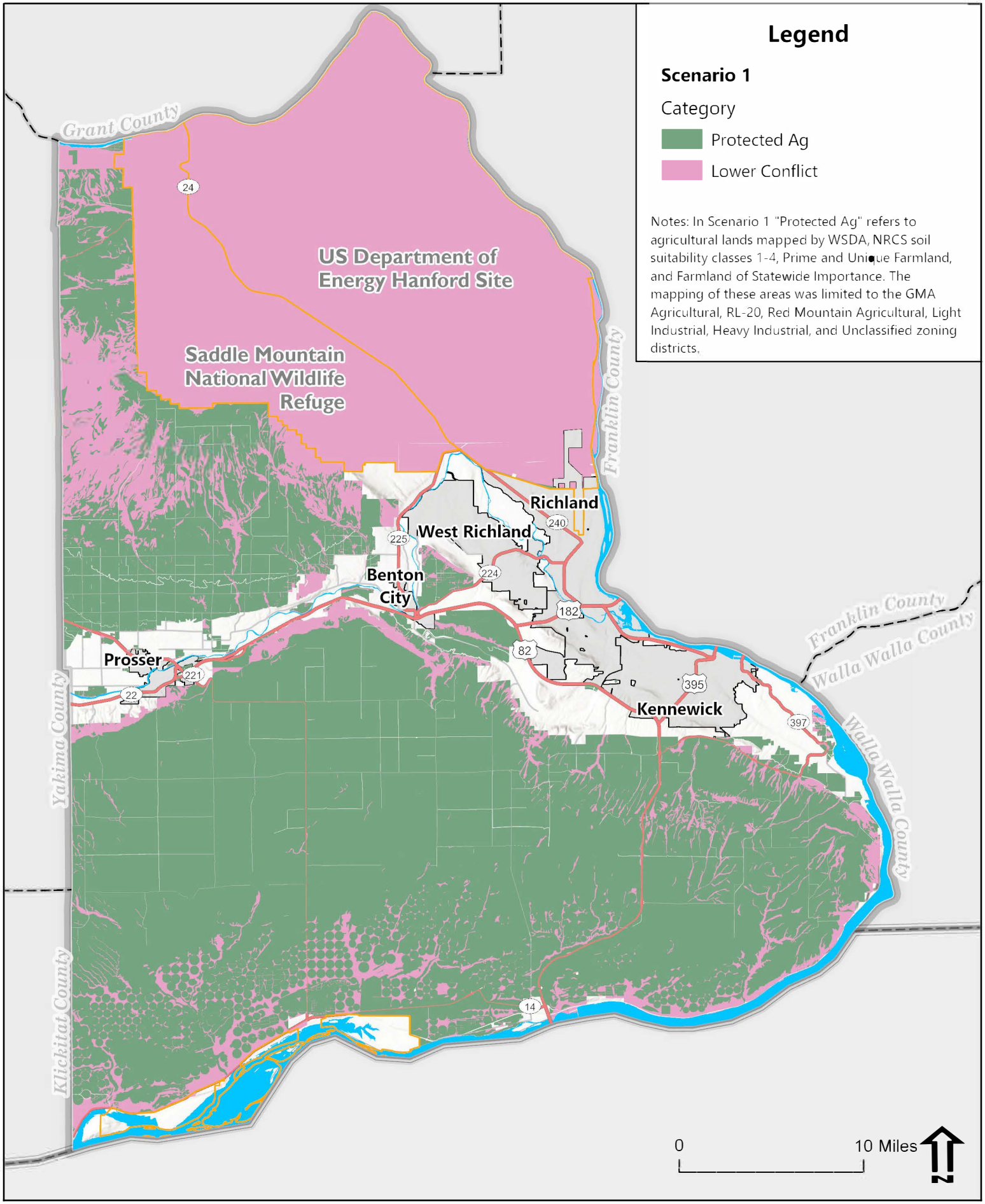
Figure A-6

WDFW Priority Habitats & Species



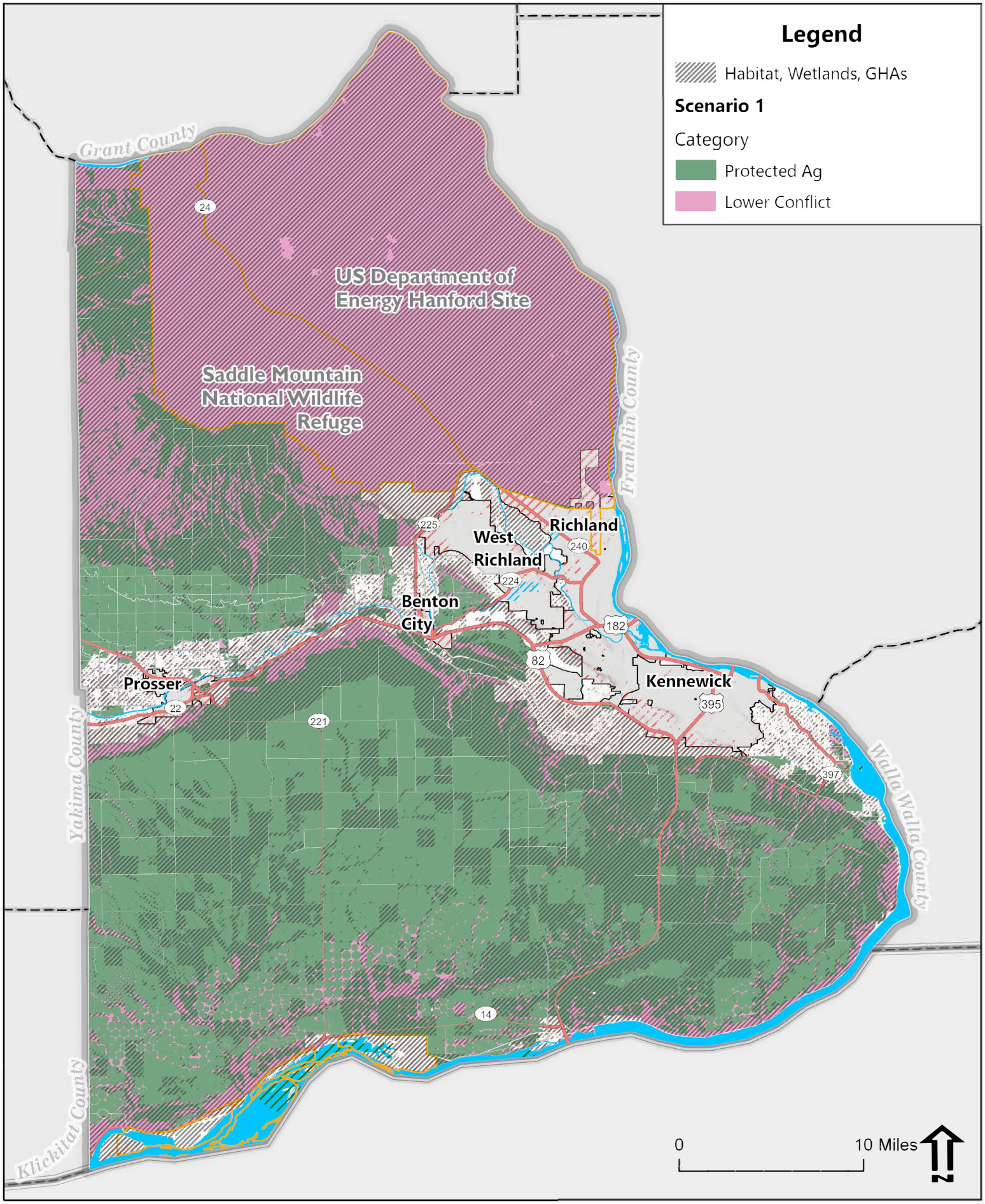
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Figure A-7
Geologically Hazardous Areas



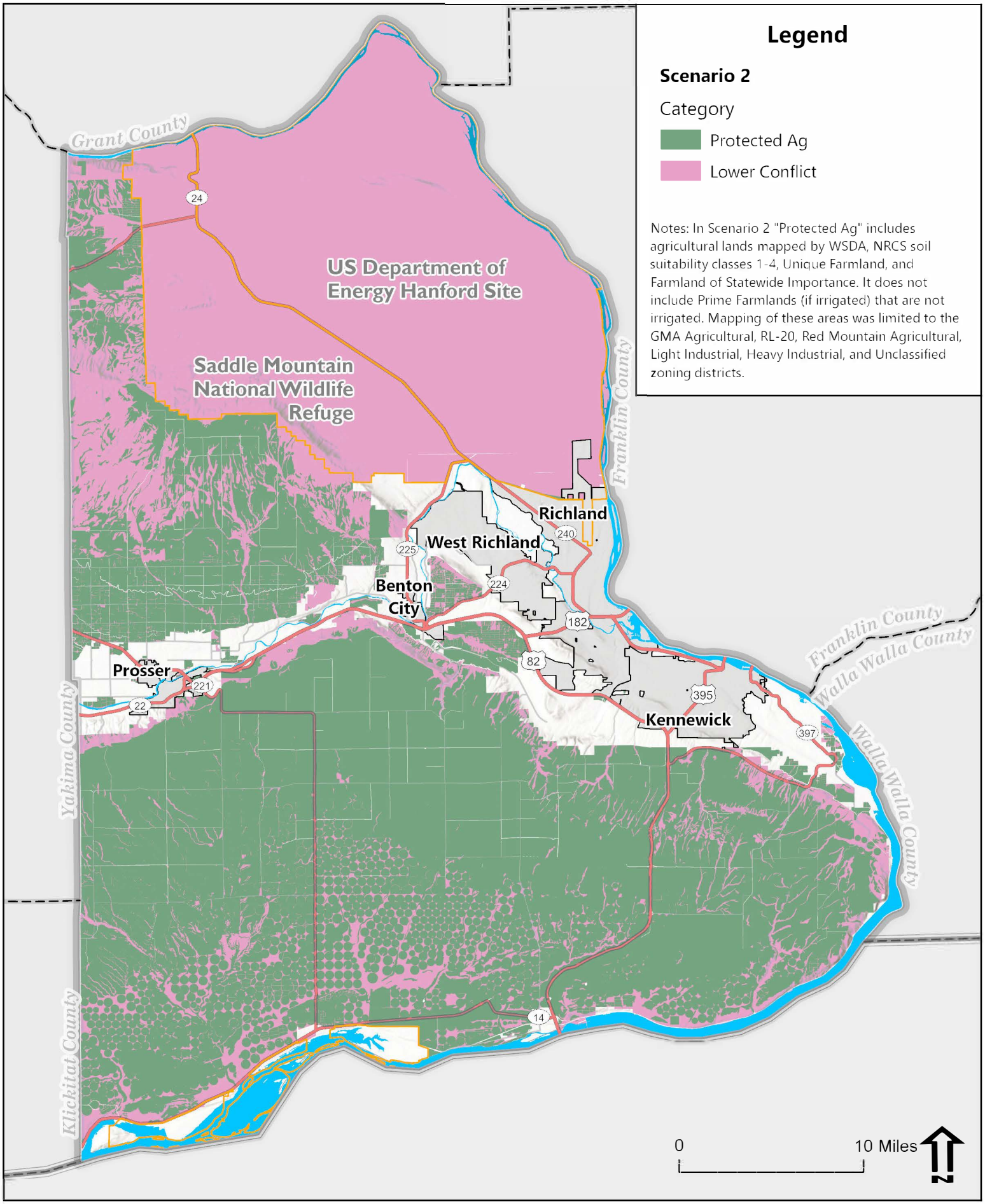
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Figure A-8
Lower Conflict Analysis Scenario 1



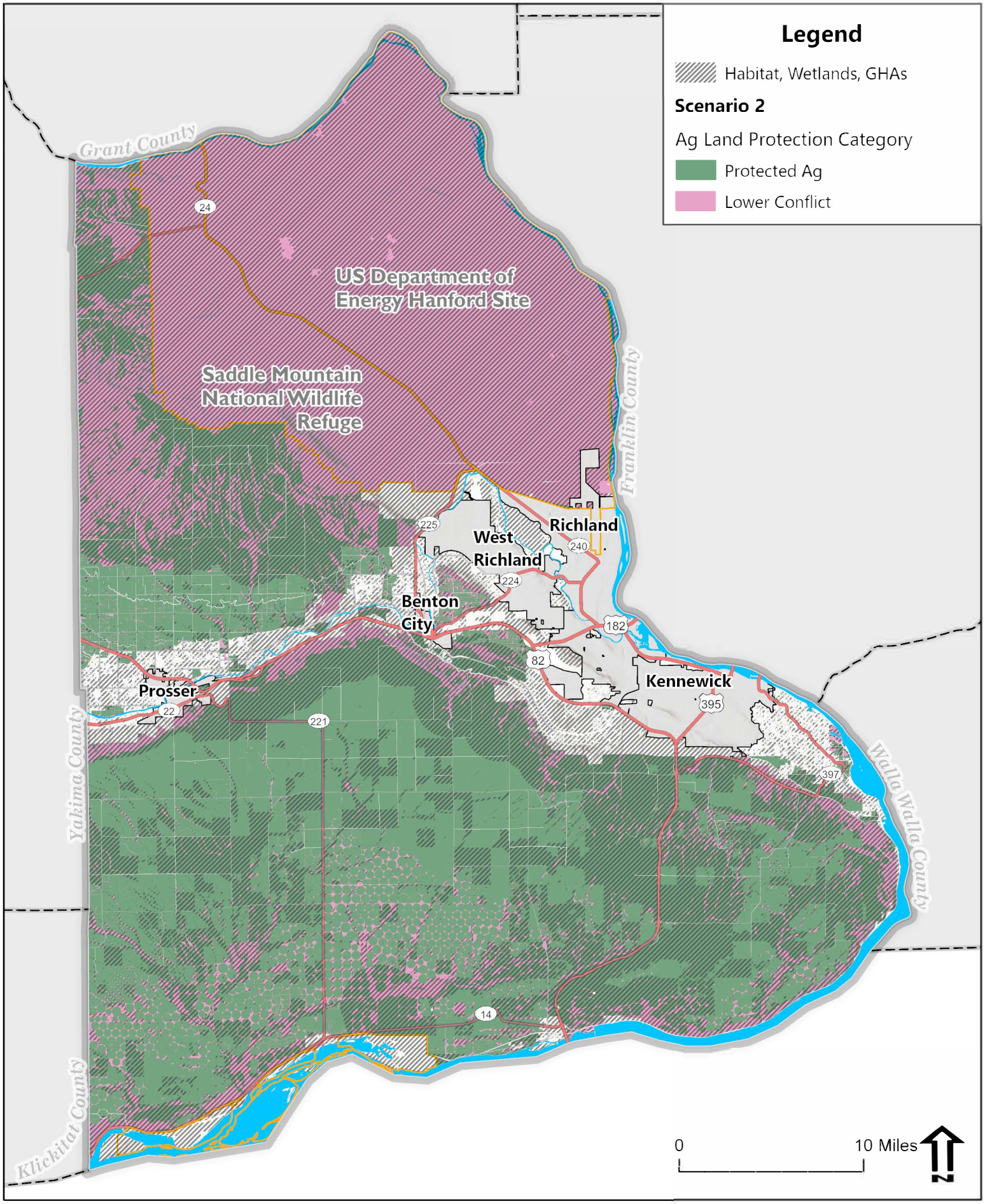
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Figure A-9
Scenario 1 with PHS & GHA



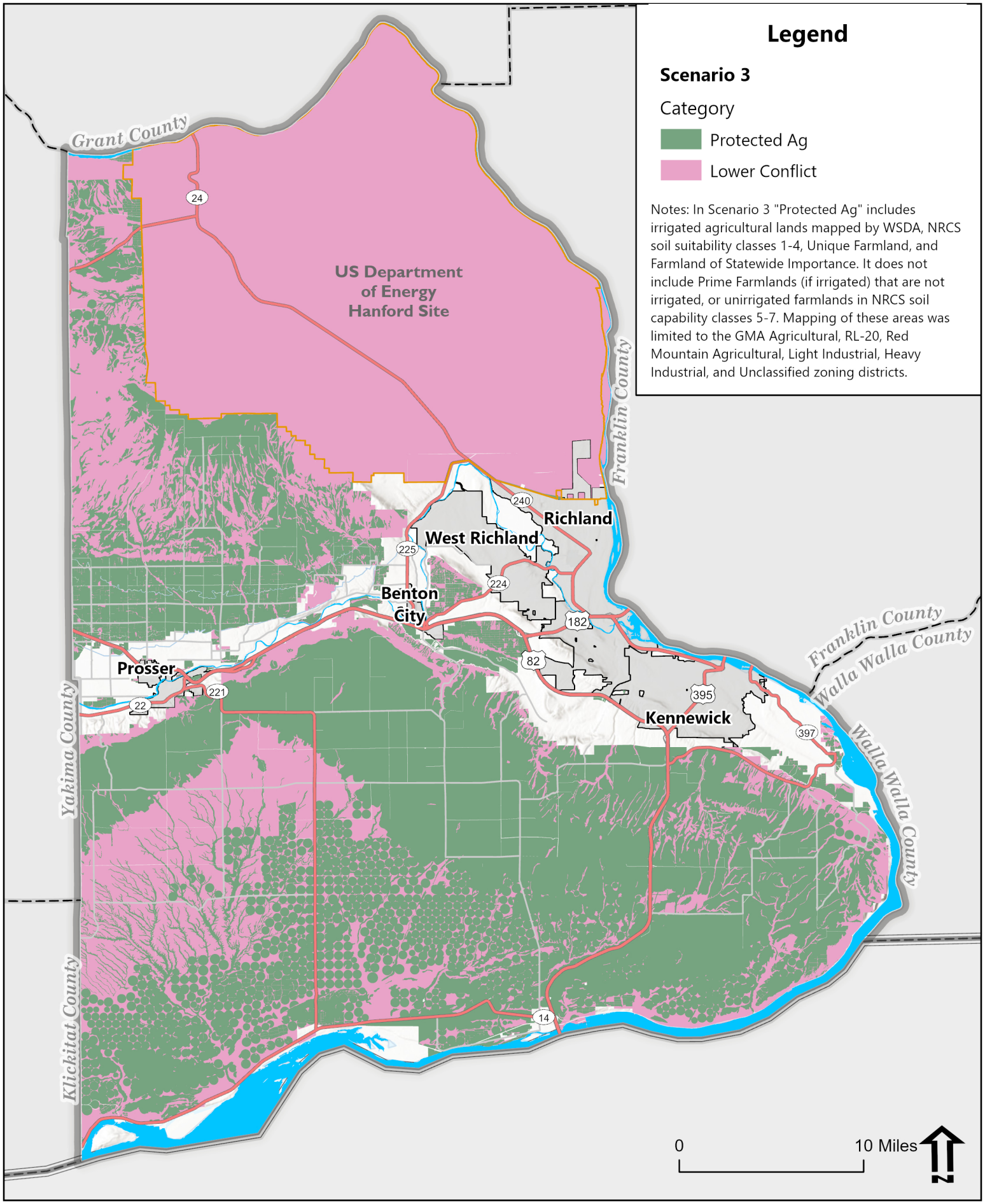
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Figure A-10
Lower Conflict Analysis Scenario 2



AC GEO

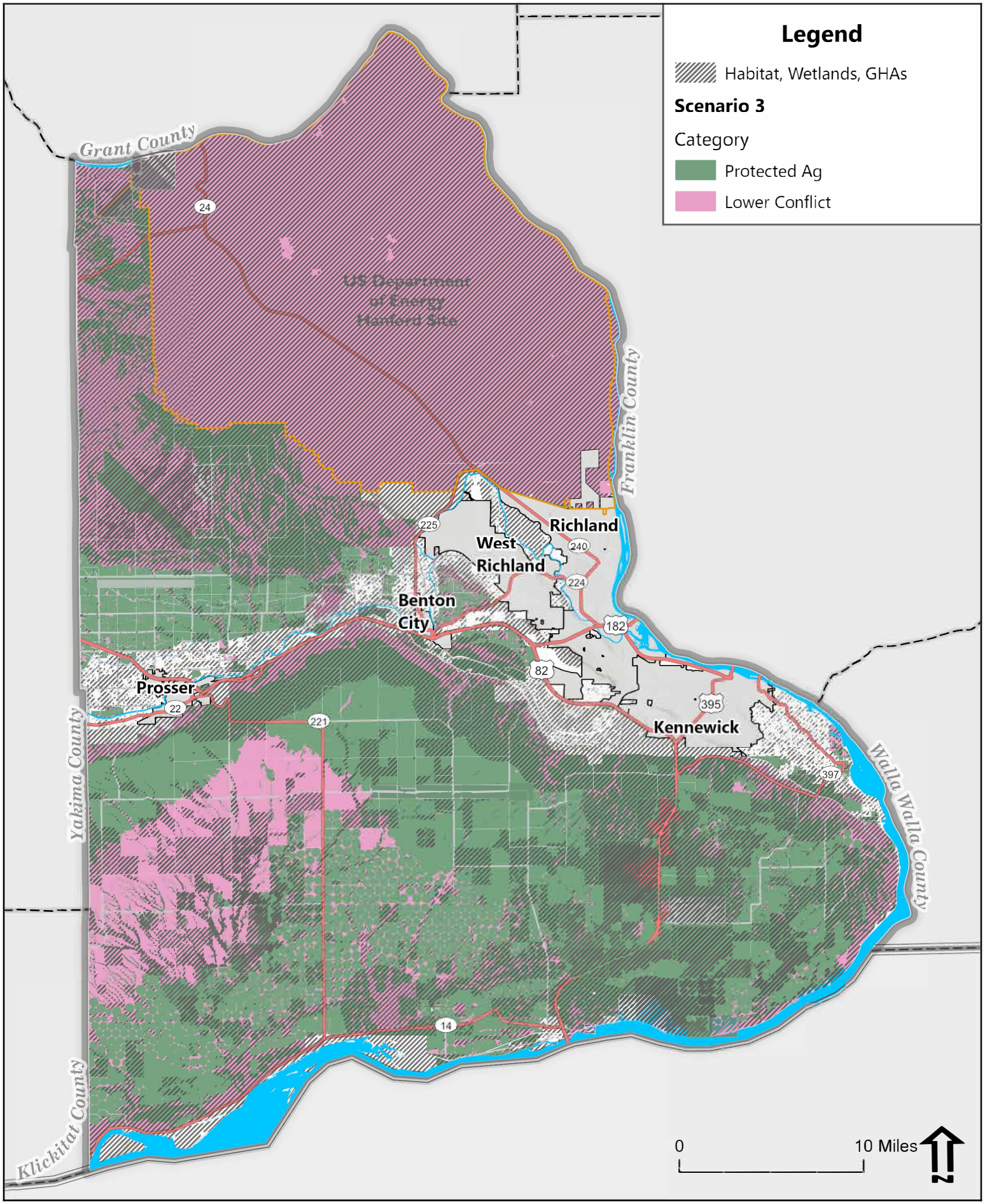
Figure A-11
Scenario 2 with PHS & GHA



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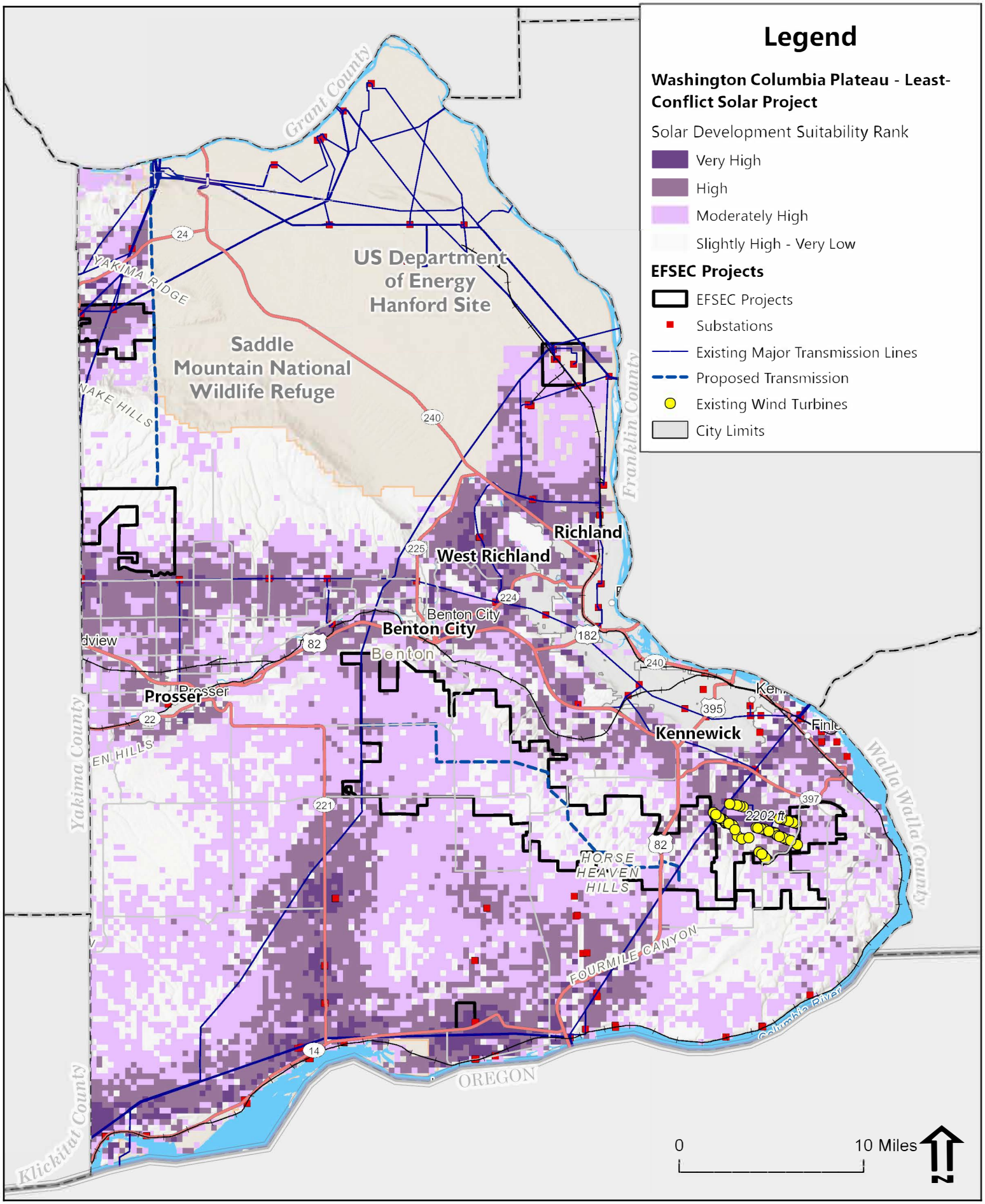
Figure A-12

Lower Conflict Analysis Scenario 3



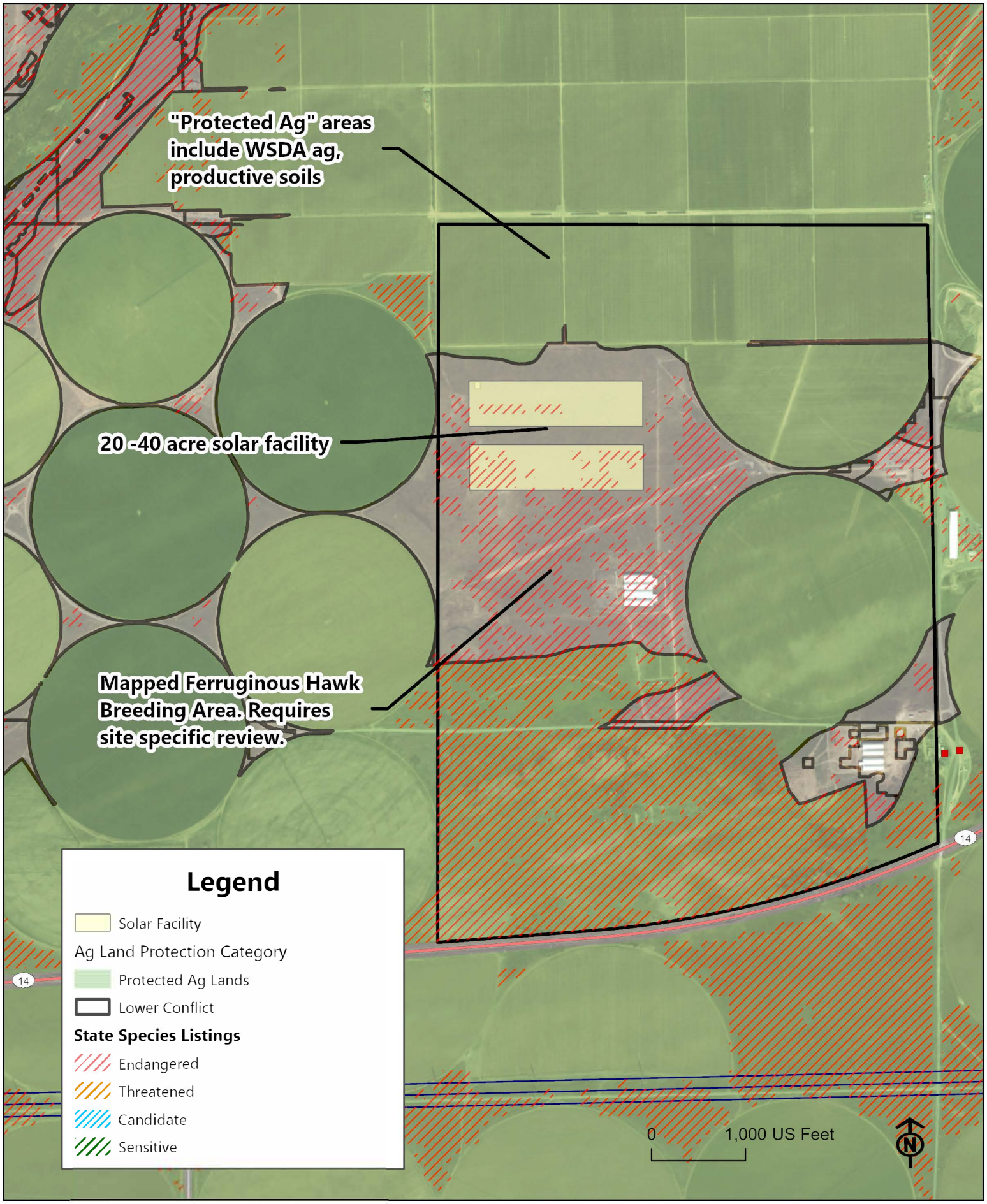
AC GEO

Figure A-13
Scenario 3 with PHS & GHA



AC GEO

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,

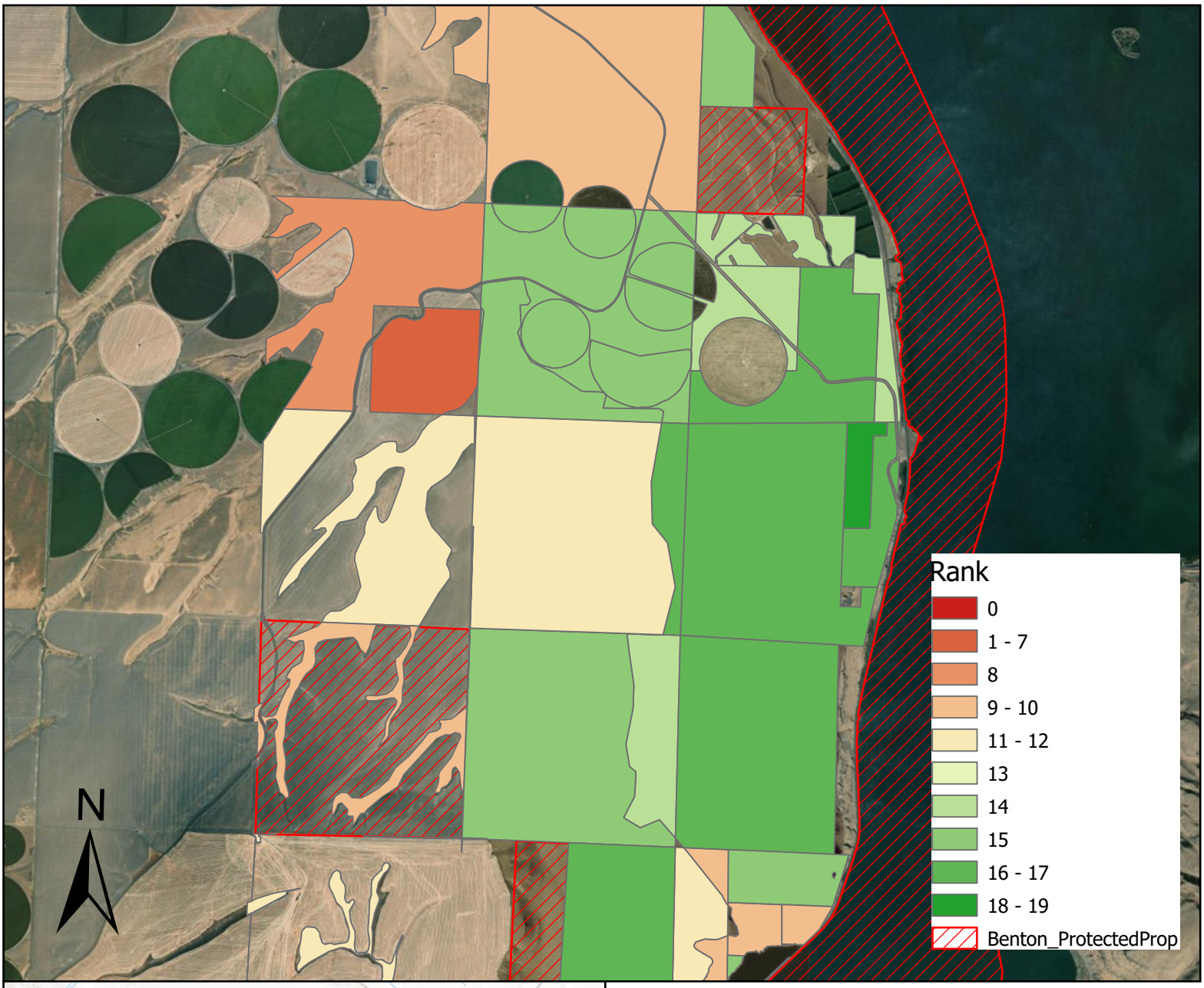
Kelsi Potterf

Voluntary Stewardship Program Coordinator

Benton & Franklin Conservation Districts

Ph: (Benton) 509.736.6000 | (Franklin) 509.416.0440

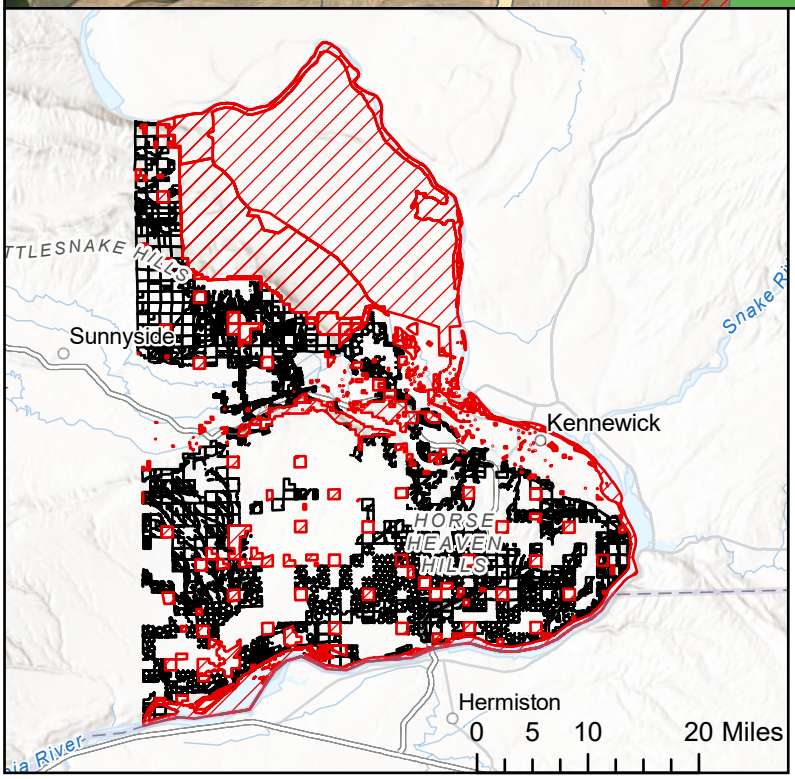
Kelsi-potterf@bentoncd.org



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Benton County Shrubsteppe Prioritization Protection and Restoration

White Bluffs Limited Professional Services Contract



Kelsi Potterf

509.736.6000

kelsi-potterf@bentoncd.org

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

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.

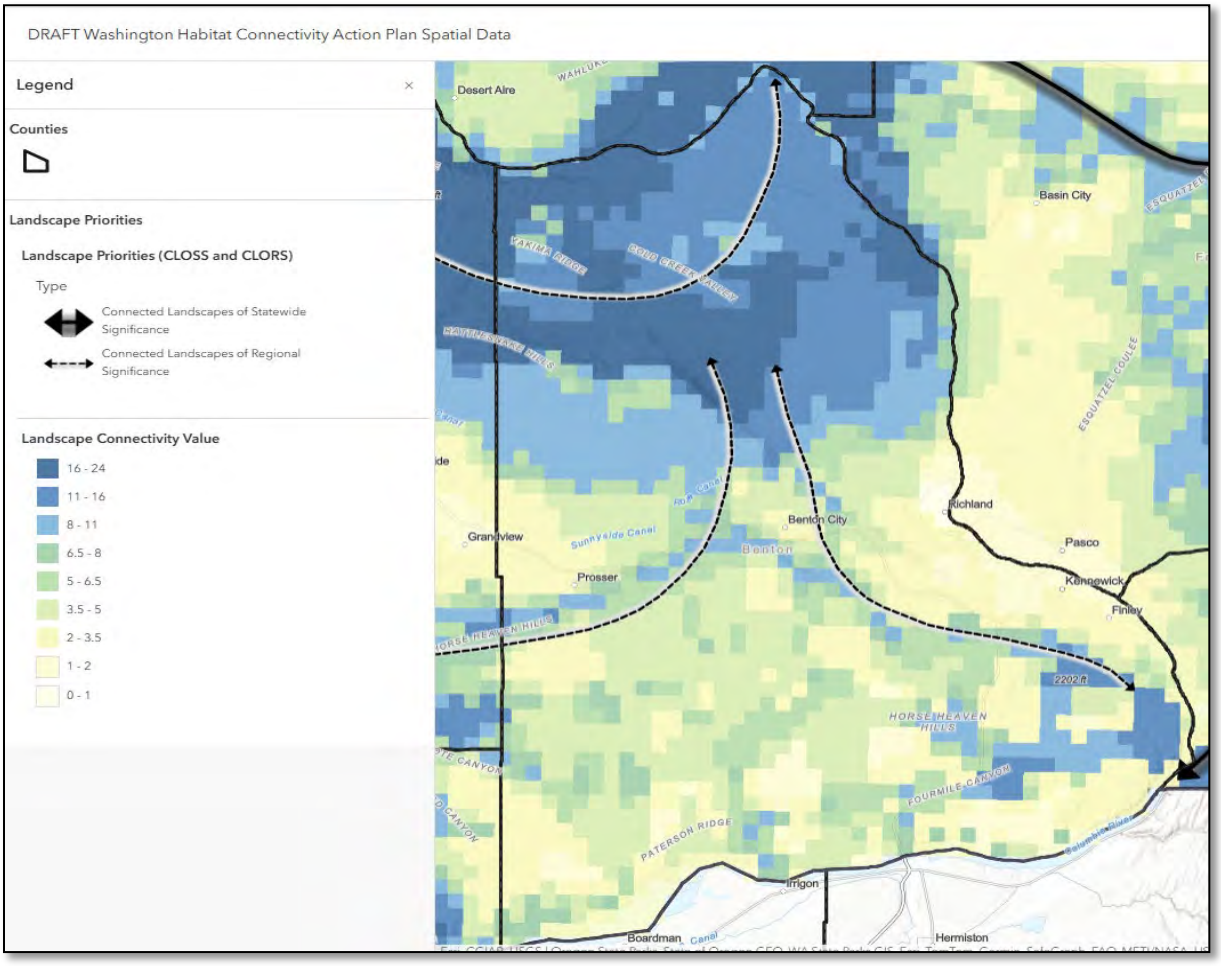
State Agency Guidance

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).

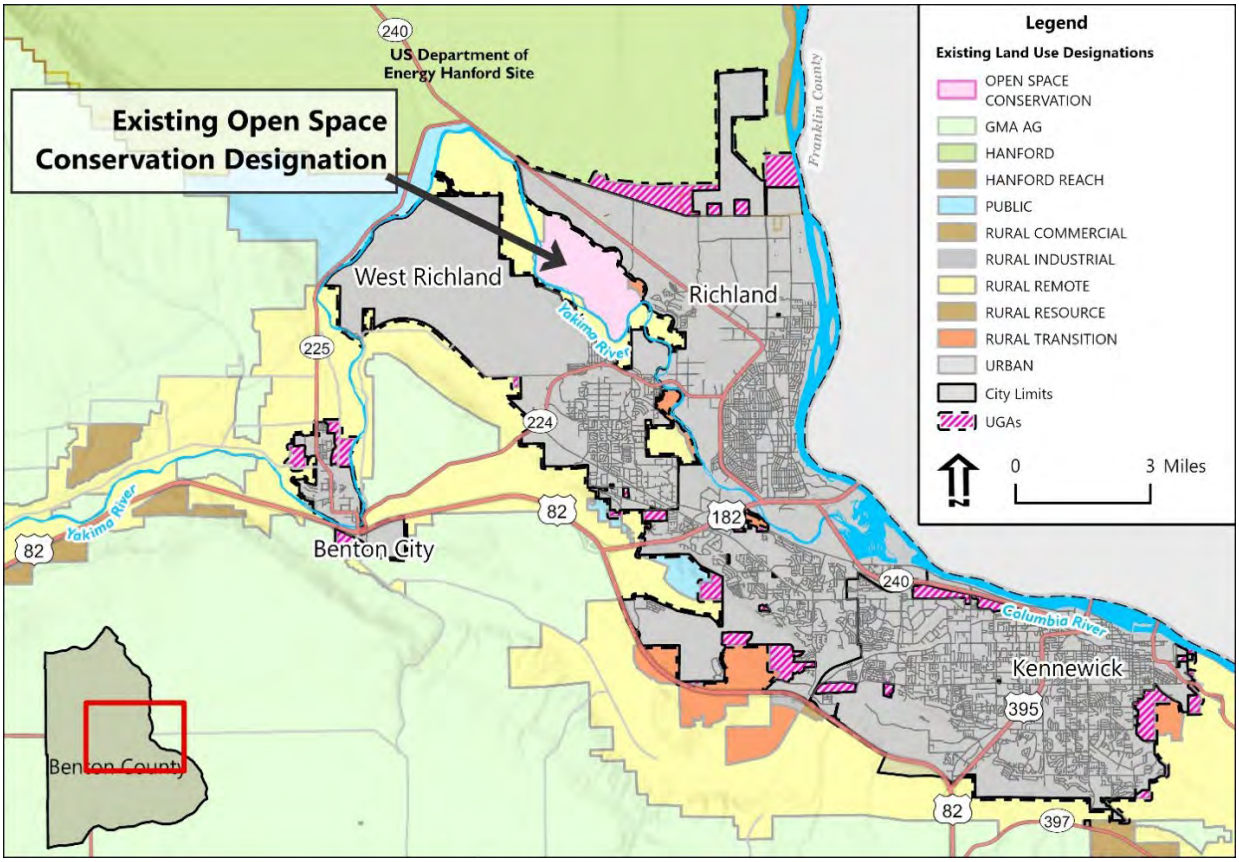
[6] Benton County Comprehensive Parks Plan, p. 26

- 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.

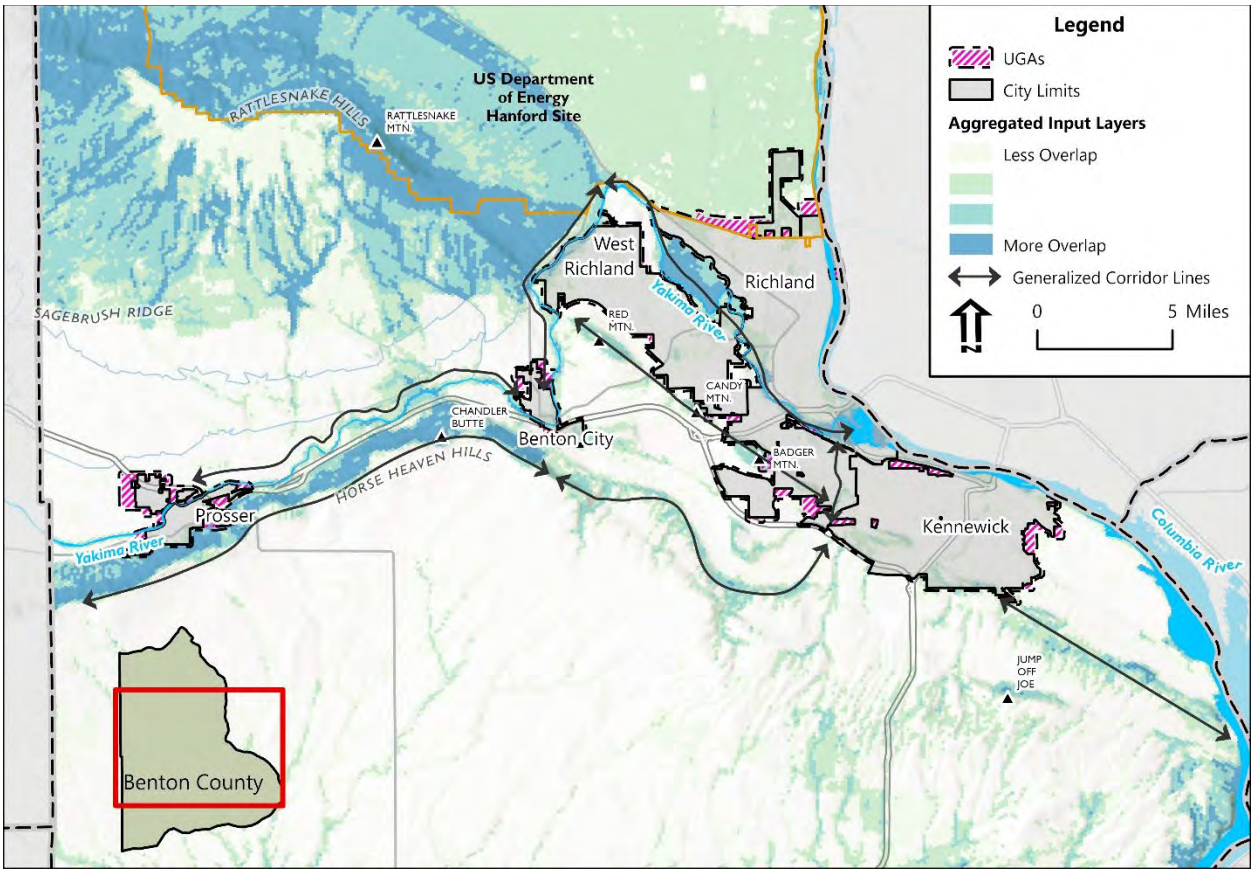
Table 1: GIS Data Sources

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.

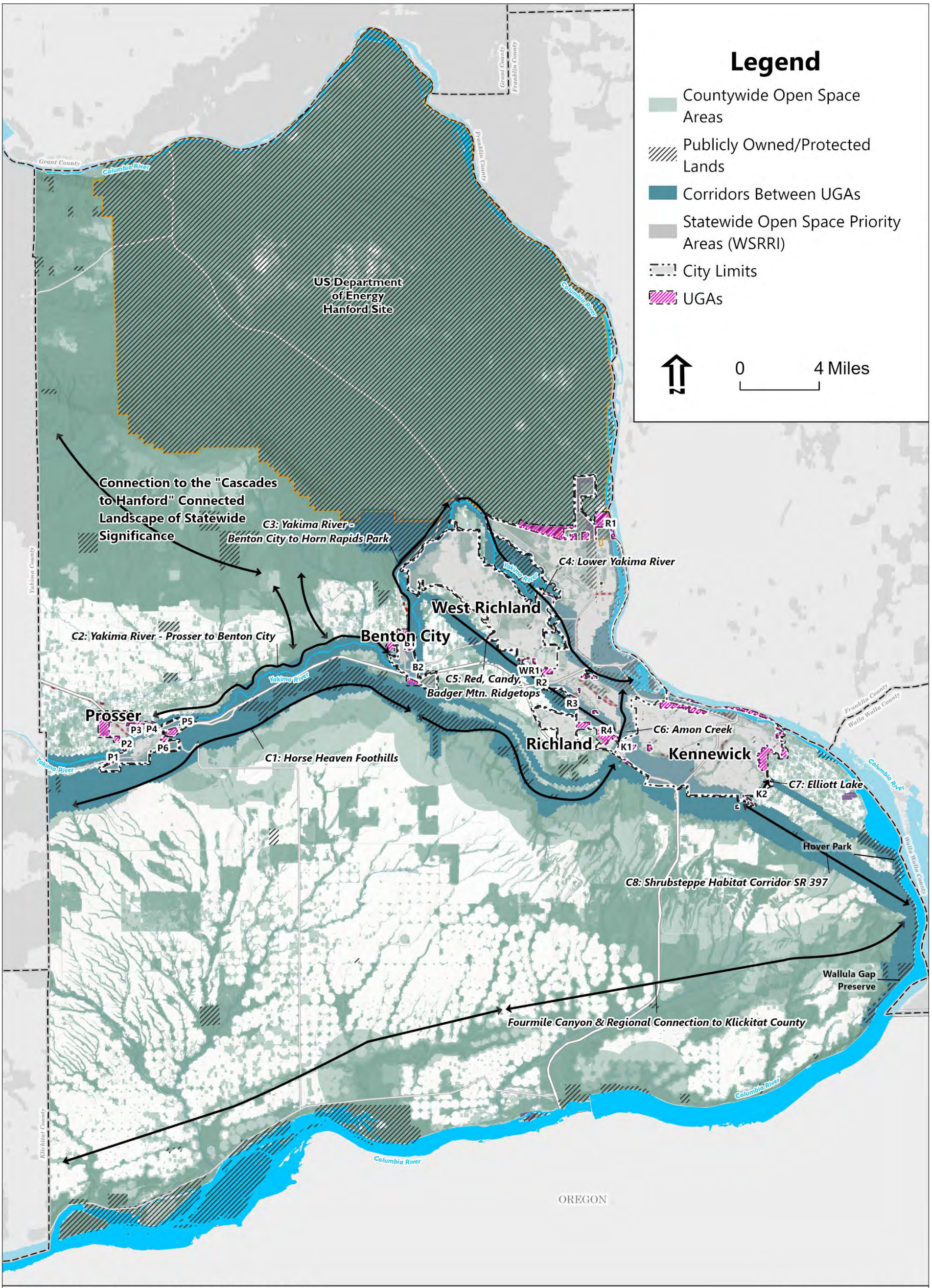
Figure 3: Aggregated Open Space Input Layers & Generalized Corridors



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 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	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		

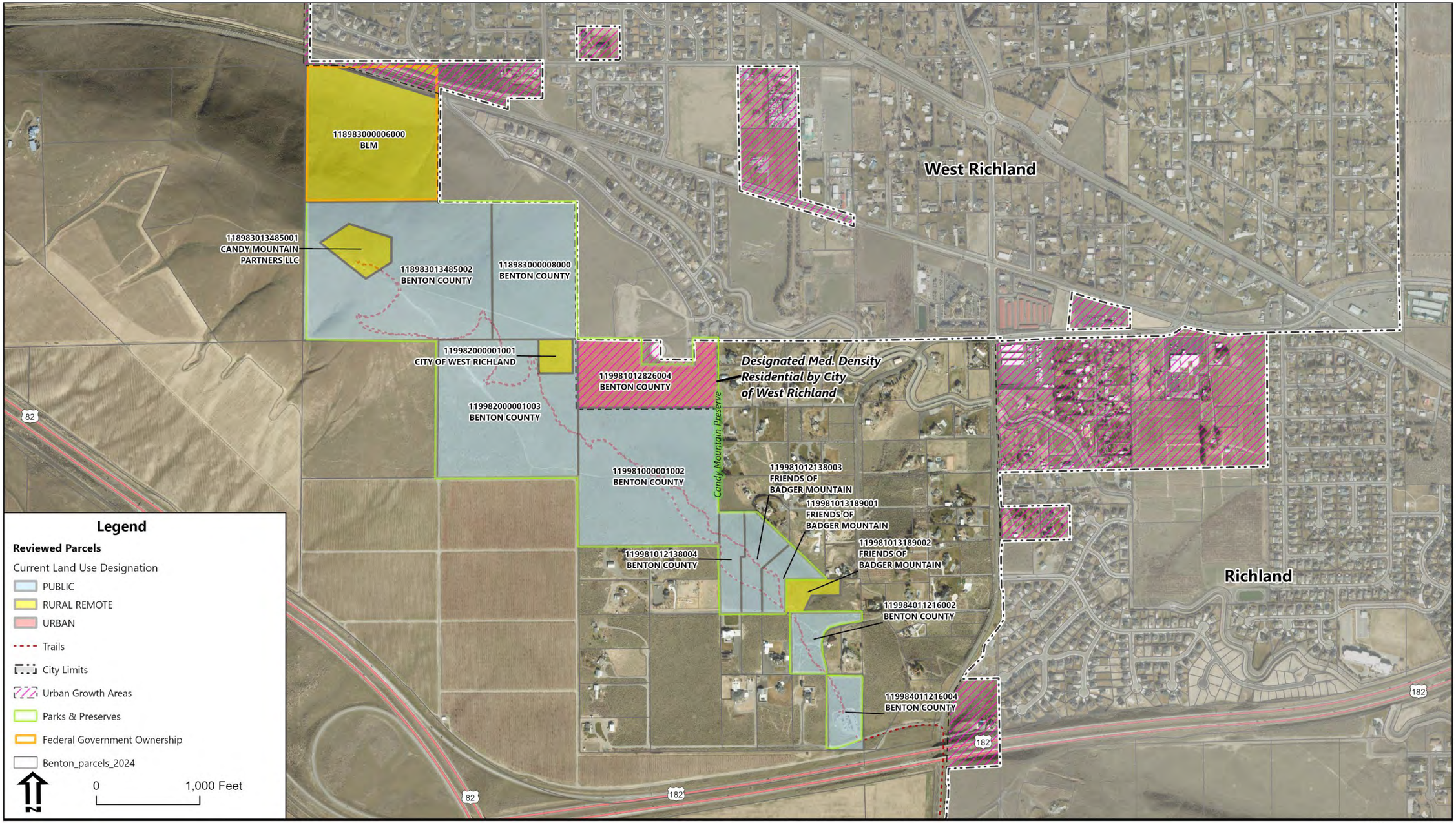
Appendix A

Parcels Reviewed for Open Space Designation

Table A-1: Parcels Reviewed for Open Space Conservation Designation

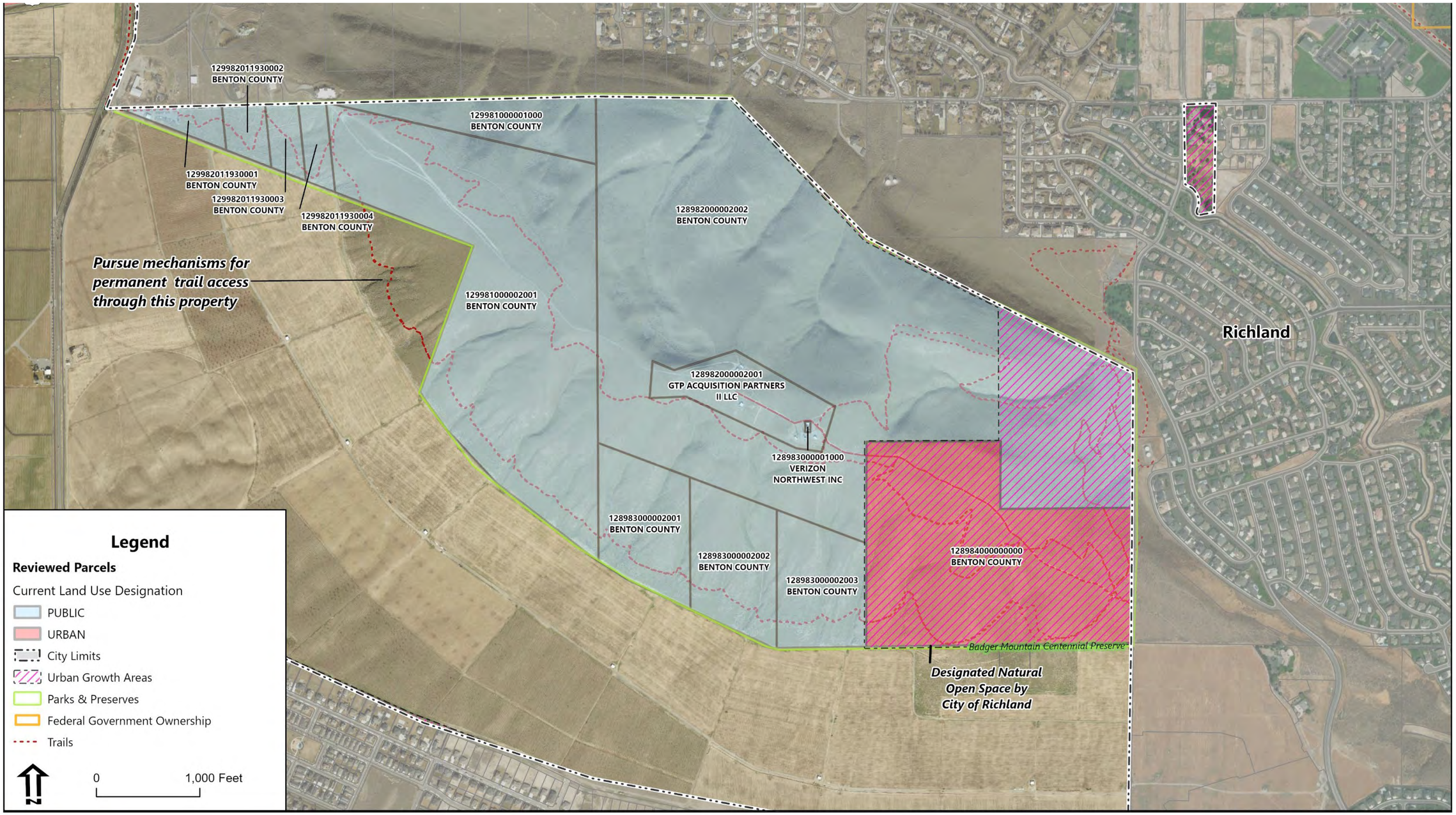
Area	Parcel ID	Acres	Owner	Land Use Designation	Zoning	Recommendations
Candy Mountain	118983000008000	25	Benton County	Public	Park District	Maintain existing designation
Candy Mountain	119981012138004	5.1	Benton County	Public	Park District	Maintain existing designation
Candy Mountain	119984011216002	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



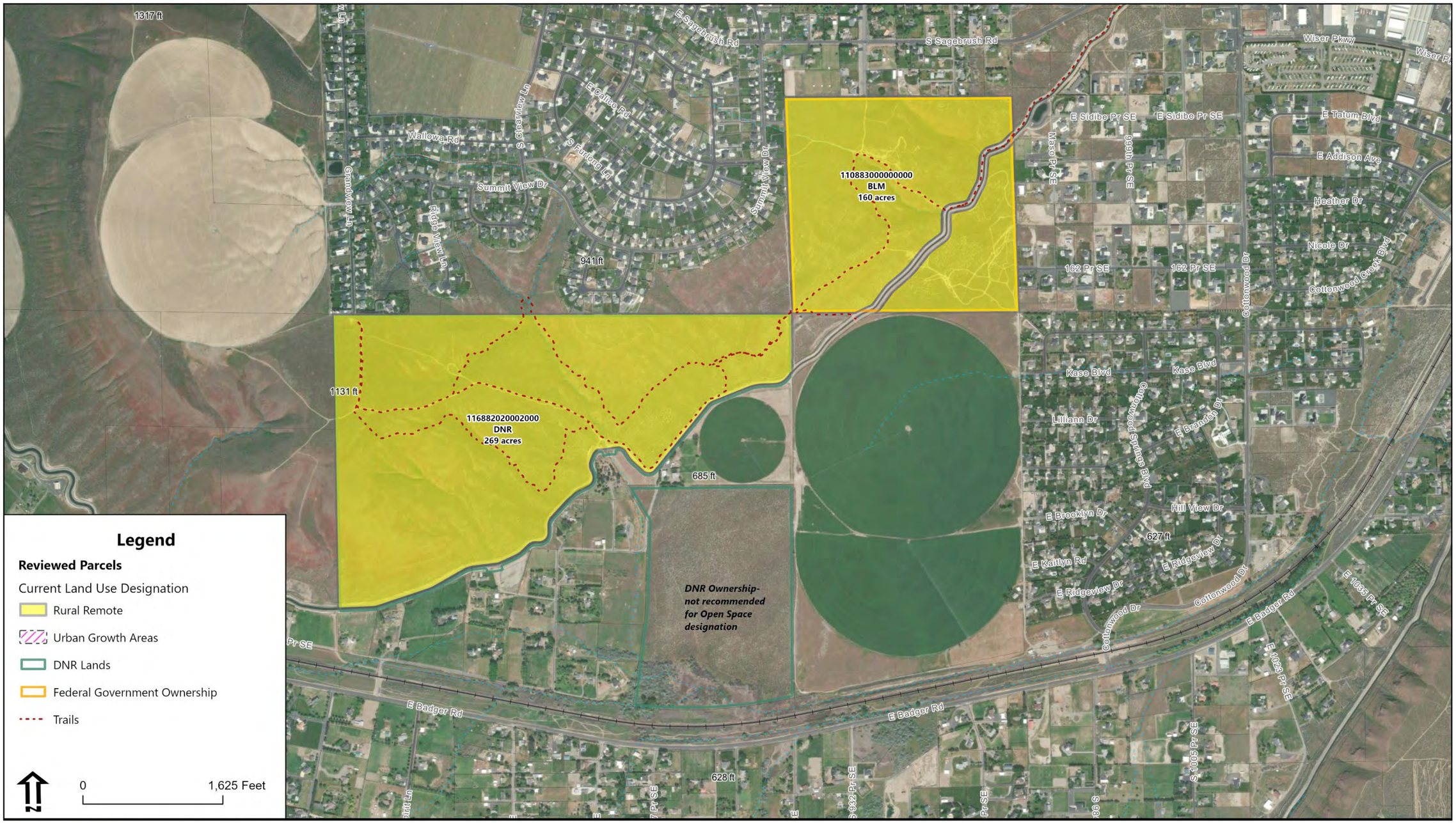
AC GEO

Figure A-1
Proposed Open Space Conservation Land Use Designation
Area 1: Candy Mountain Preserve



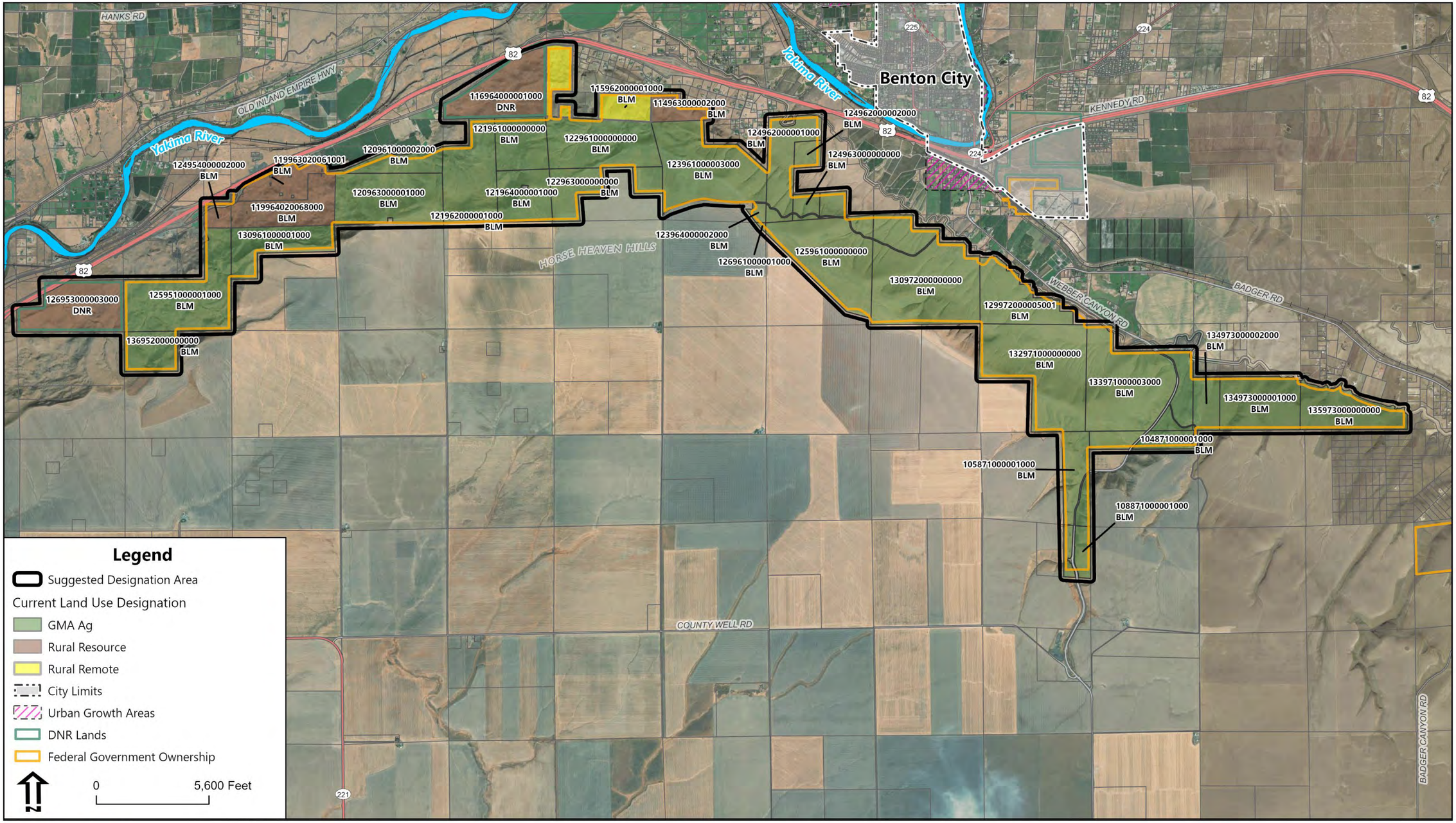
AC GEO

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

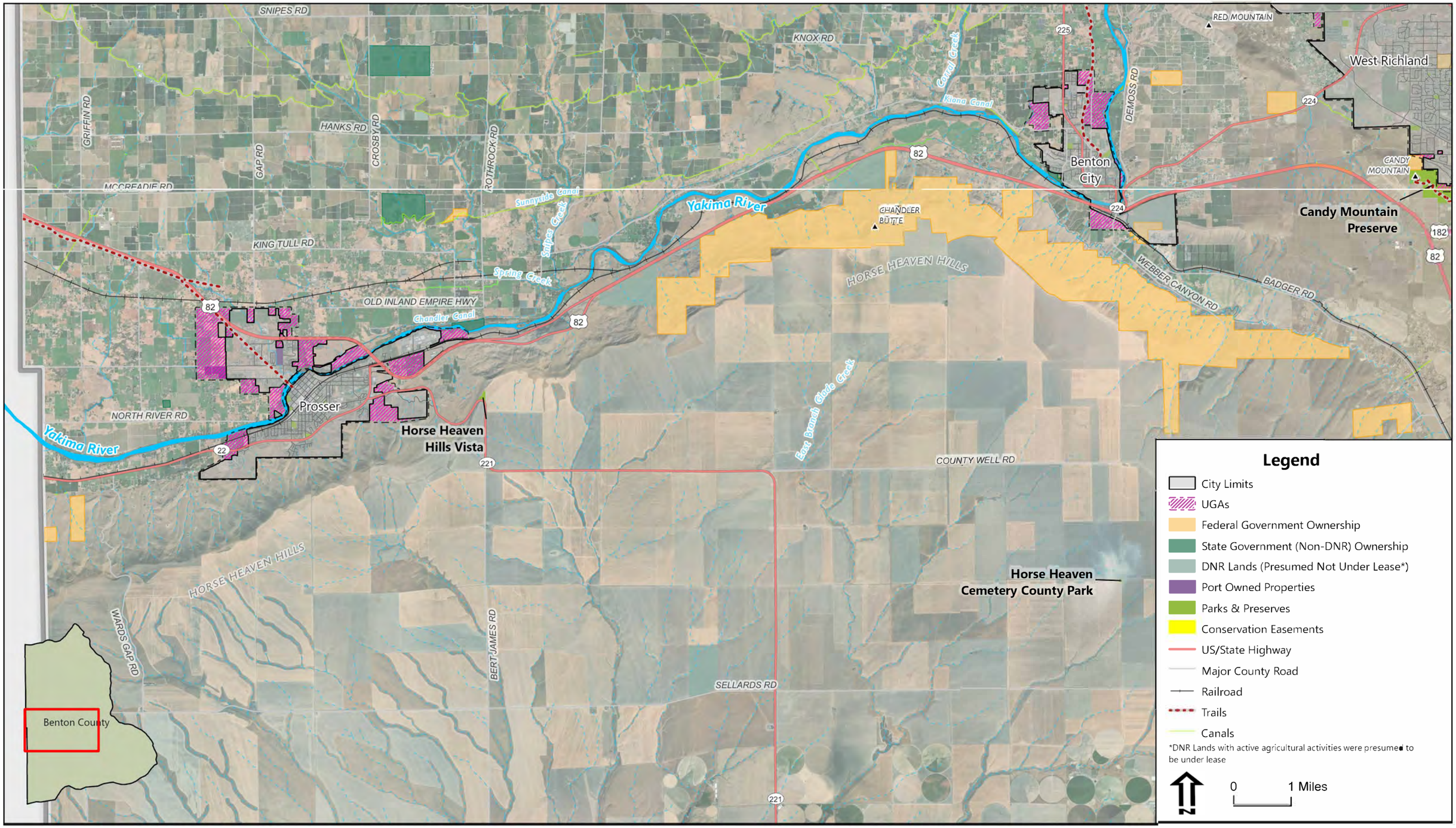


Figure B-1

Prosser - Benton City

Public Land, Parks, & Trails

AC GEO

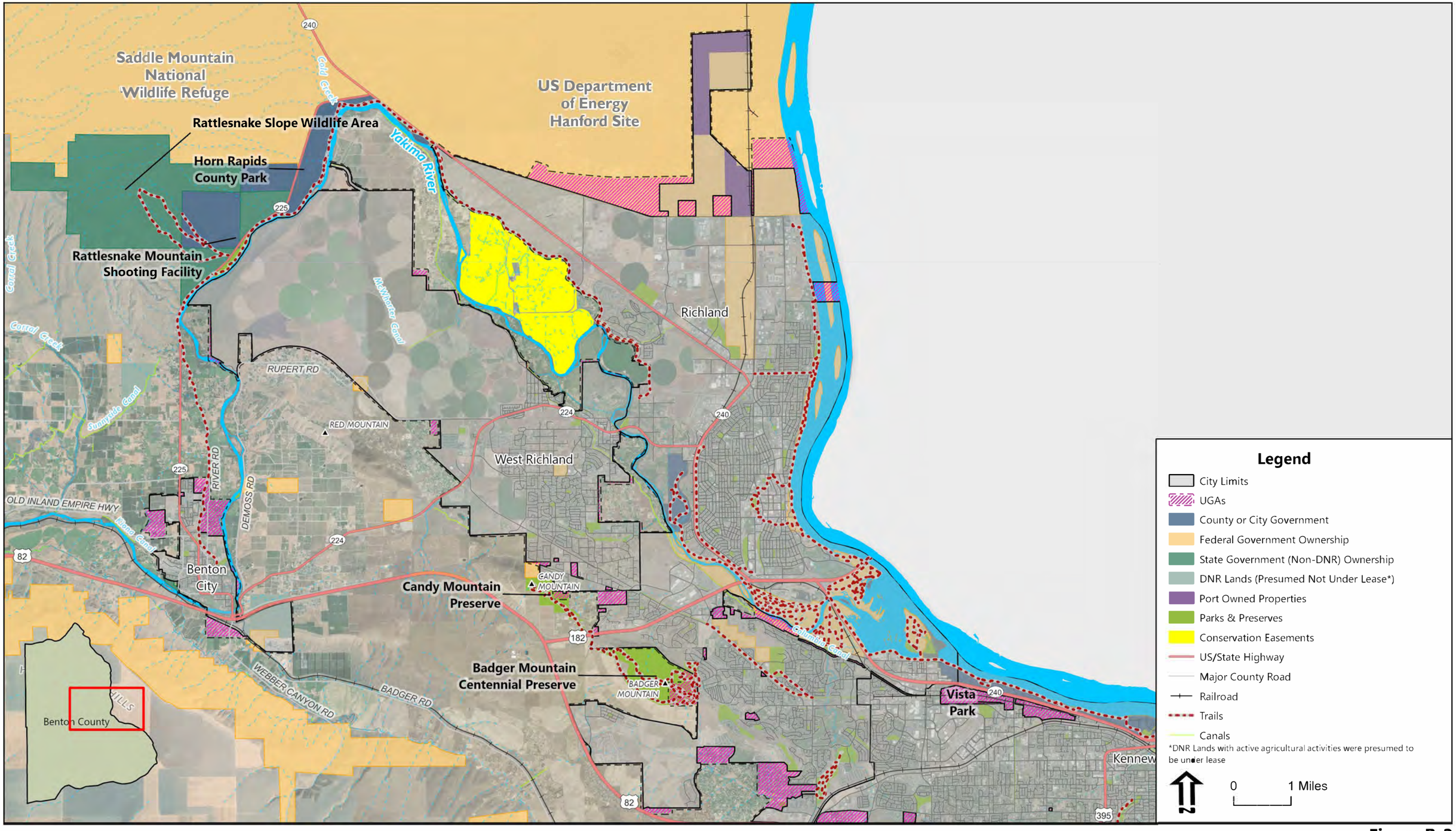


Figure B-2

Benton City - West Richland - Richland

Public Land, Parks, & Trails

AC GEO

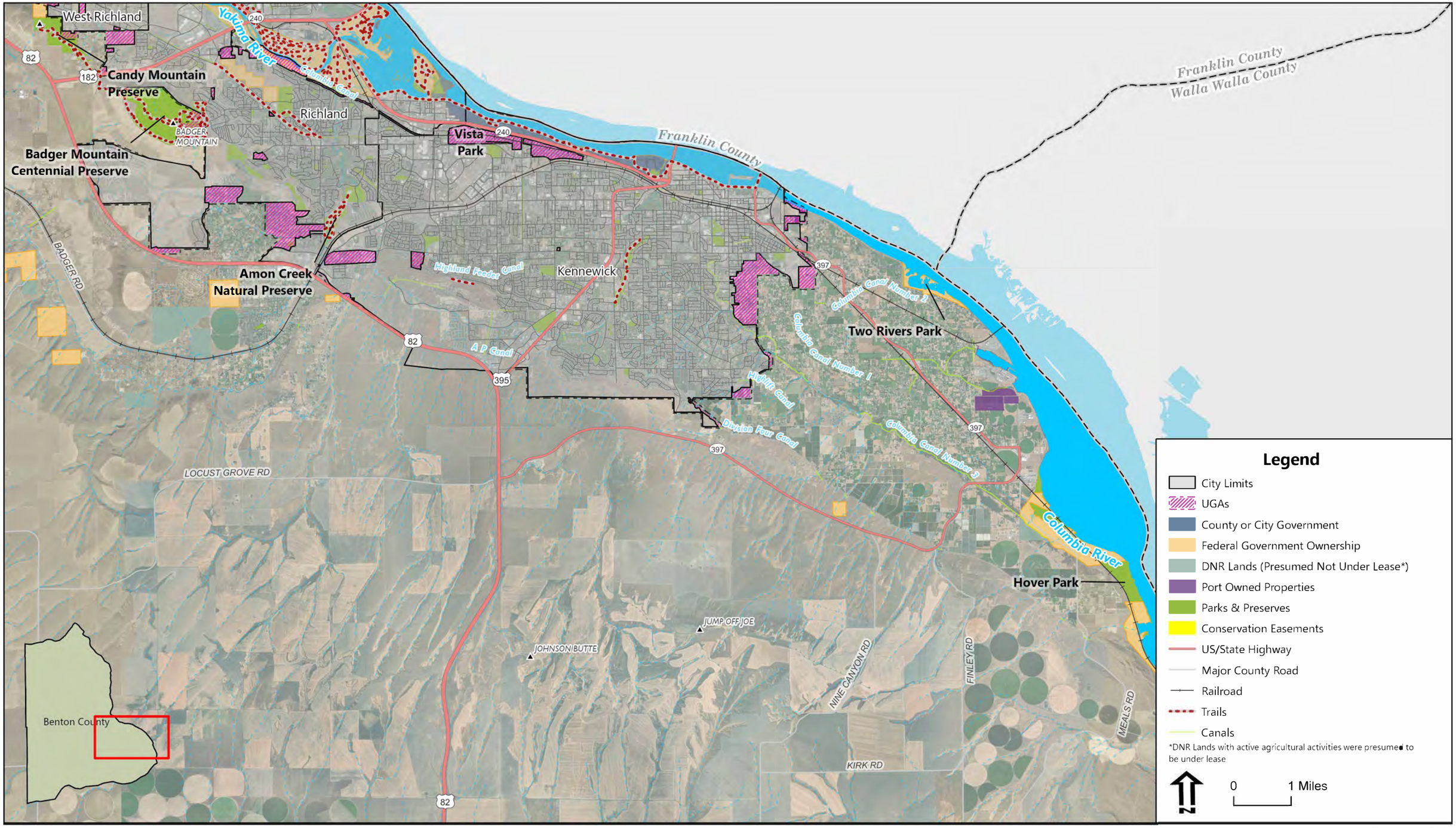


Figure B-3

Richland - Kennewick

Public Land, Parks & Trails

AC GEO

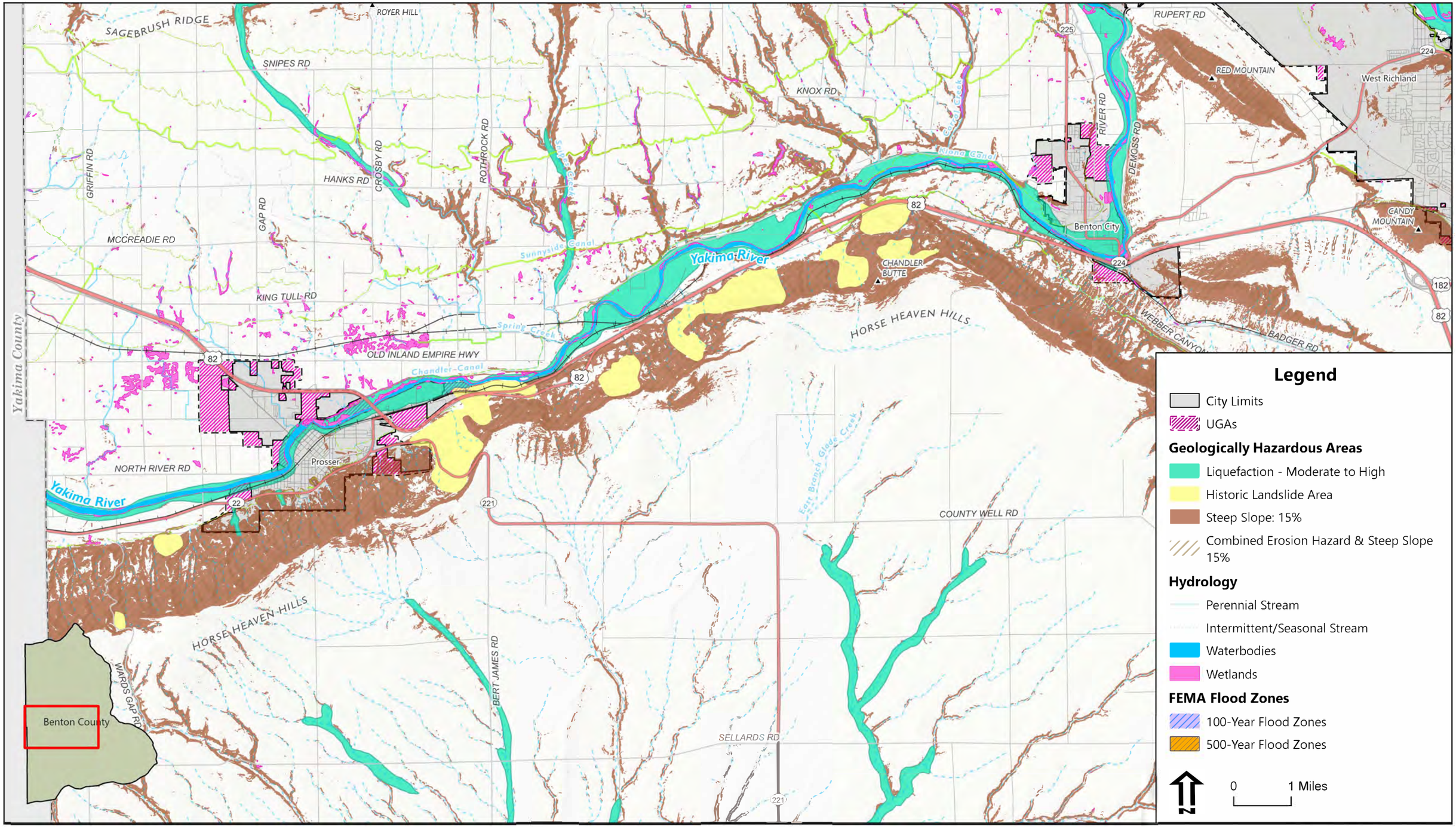


Figure B- 4

Prosser - Benton City

Wetlands, Floodplains, Geologically Hazardous Areas

AC GEO

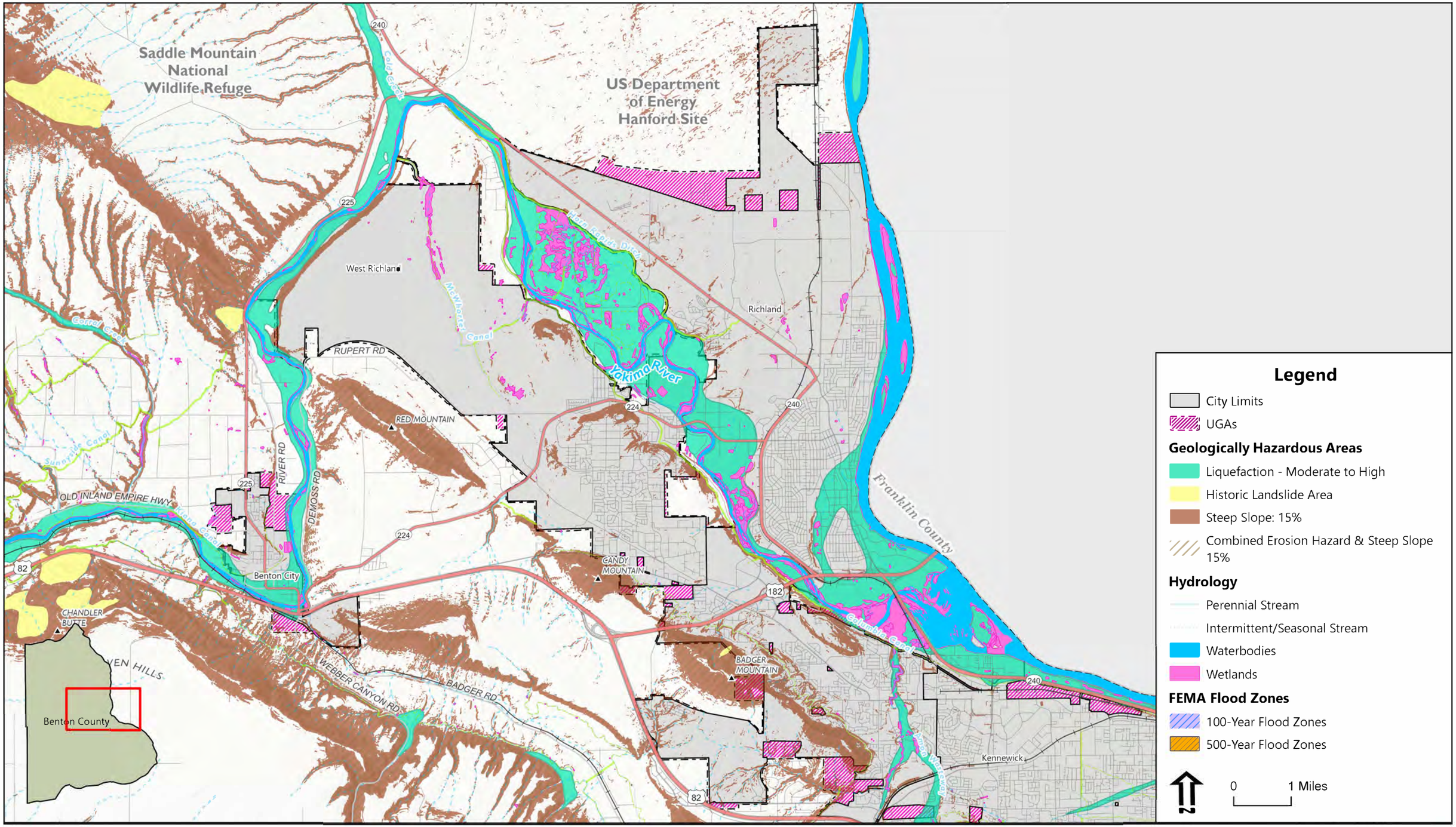


Figure B-5

Benton City - West Richland - Richland

Wetlands, Floodplains, Geologically Hazardous Areas

AC GEO

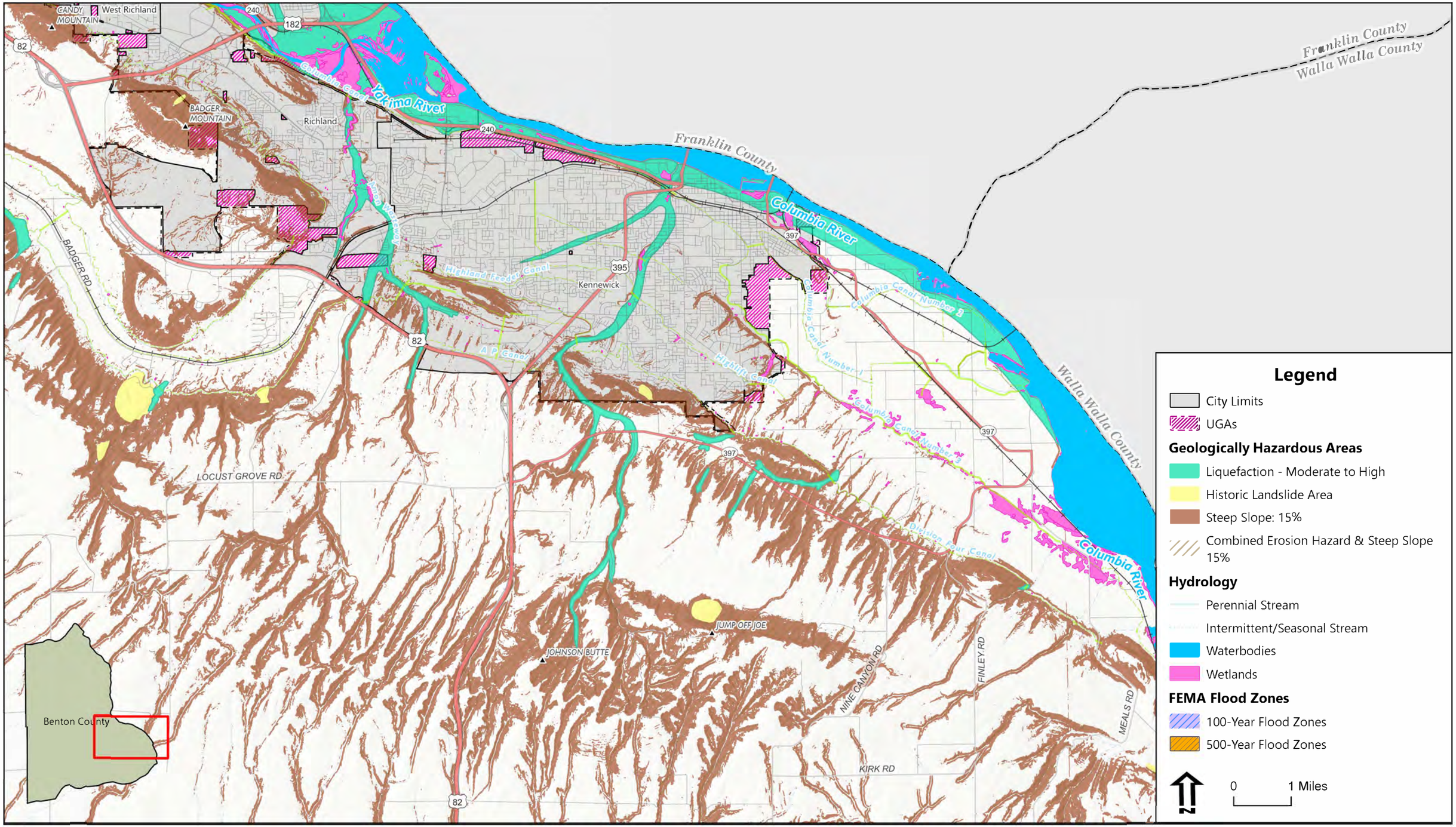


Figure B-6

Richland - Kennewick

Wetlands, Floodplains, Geologically Hazardous Areas

AC GEO

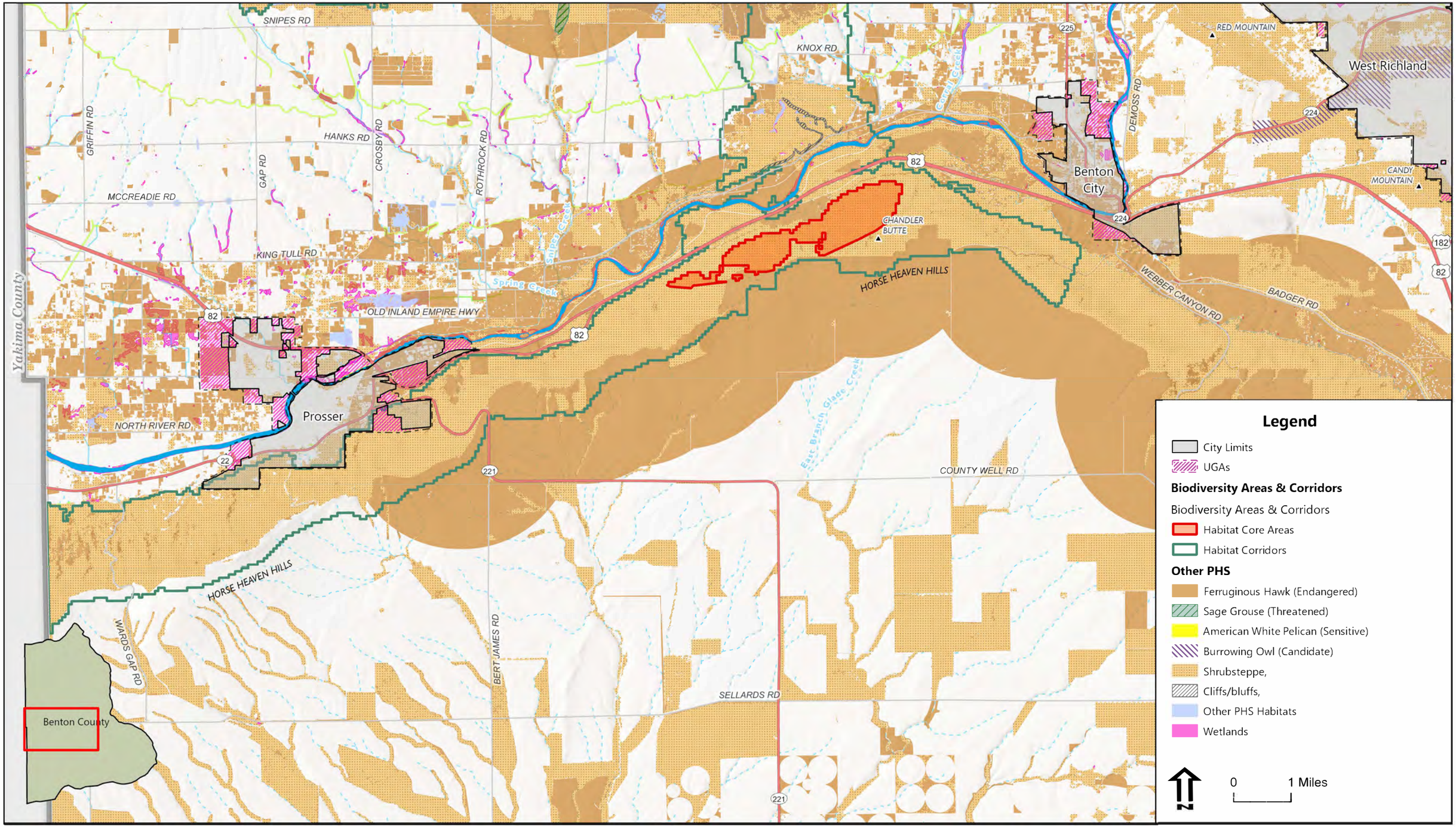


Figure B-7
Prosser - Benton City
WDFW PHS Habitats

AC GEO

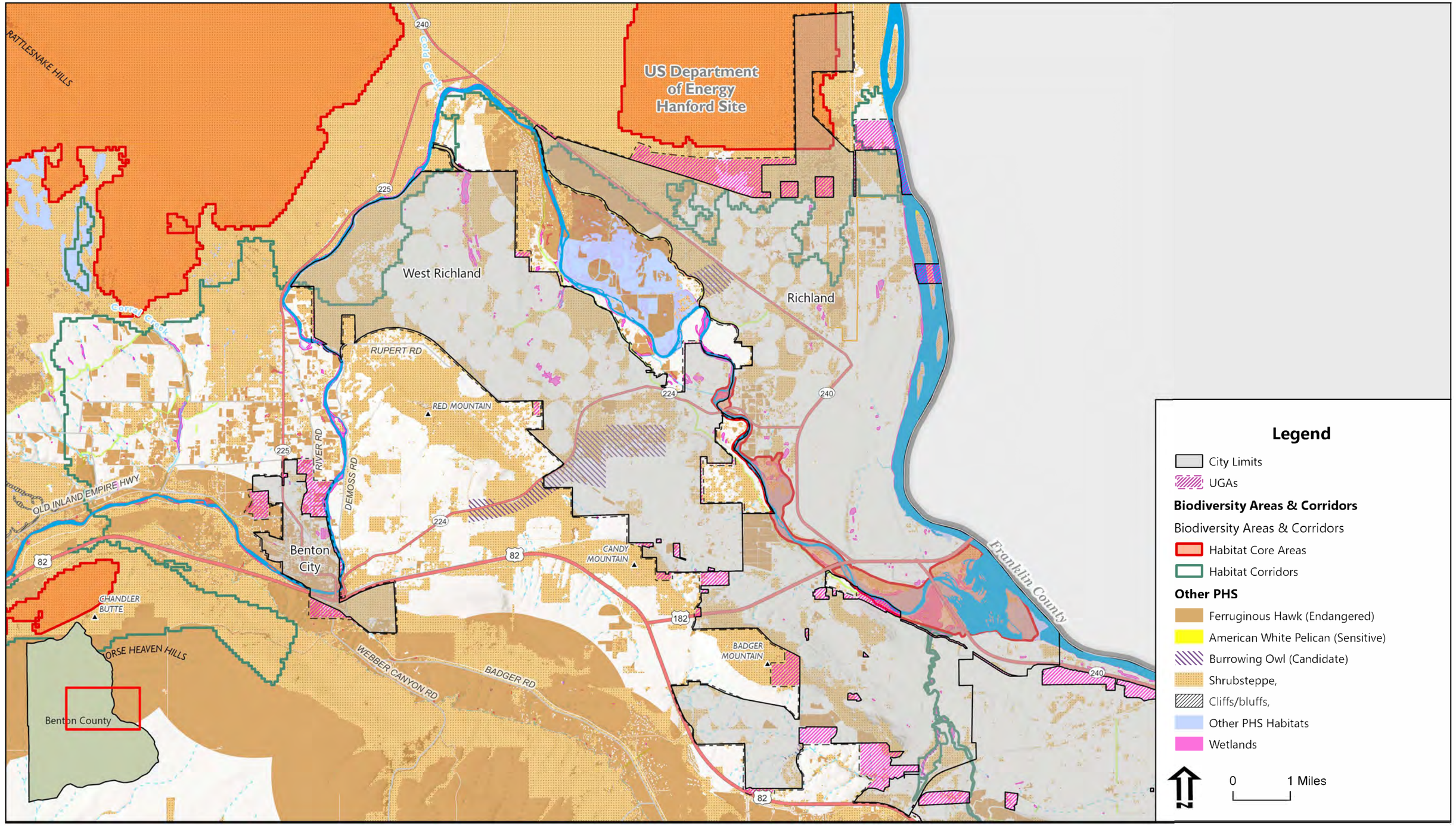


Figure B-8

Benton City - West Richland - Richland

WDFW PHS Habitats

AC GEO

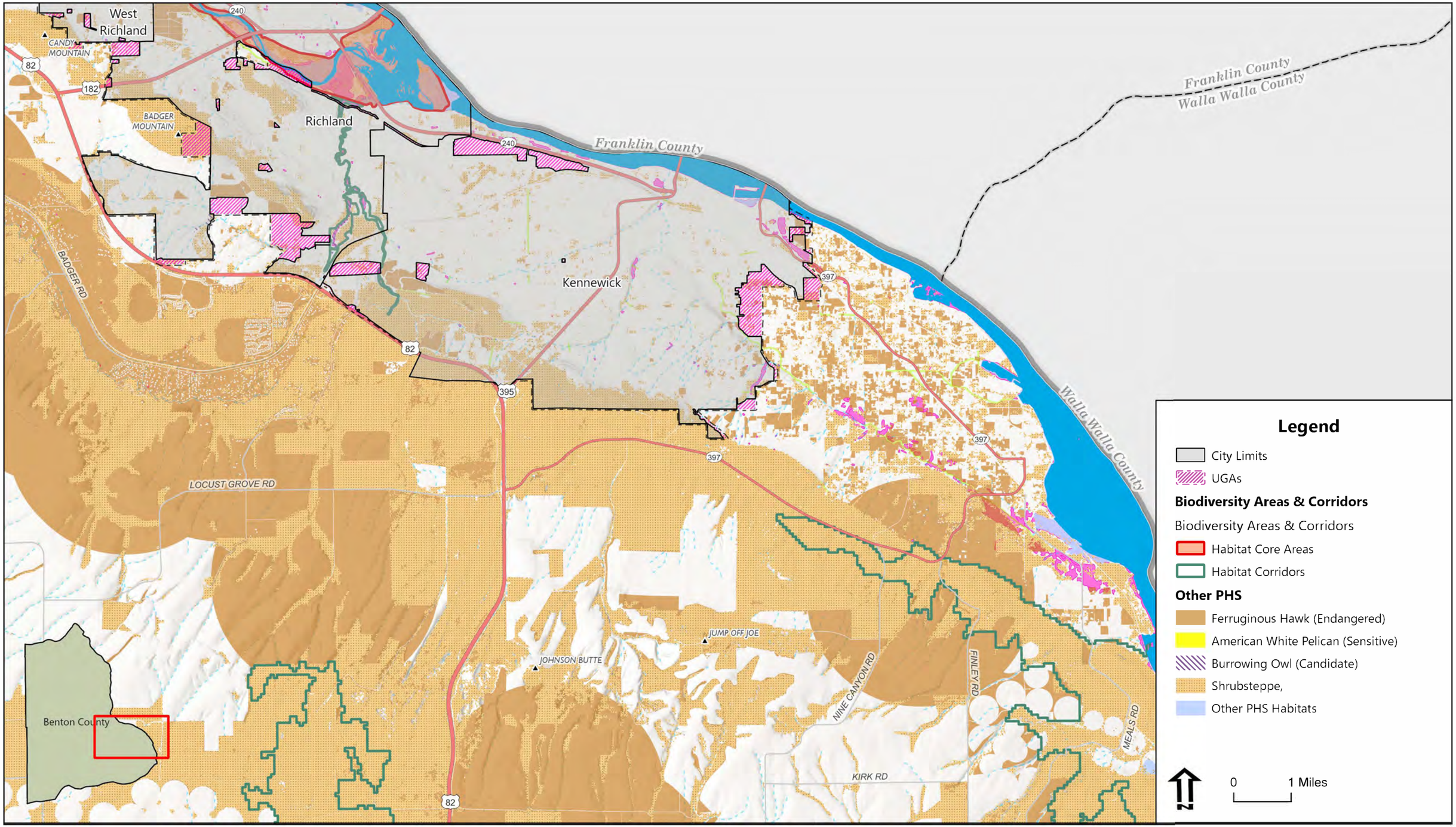


Figure B-9

Richland - Kennewick

WDFW PHS Habitats

AC GEO

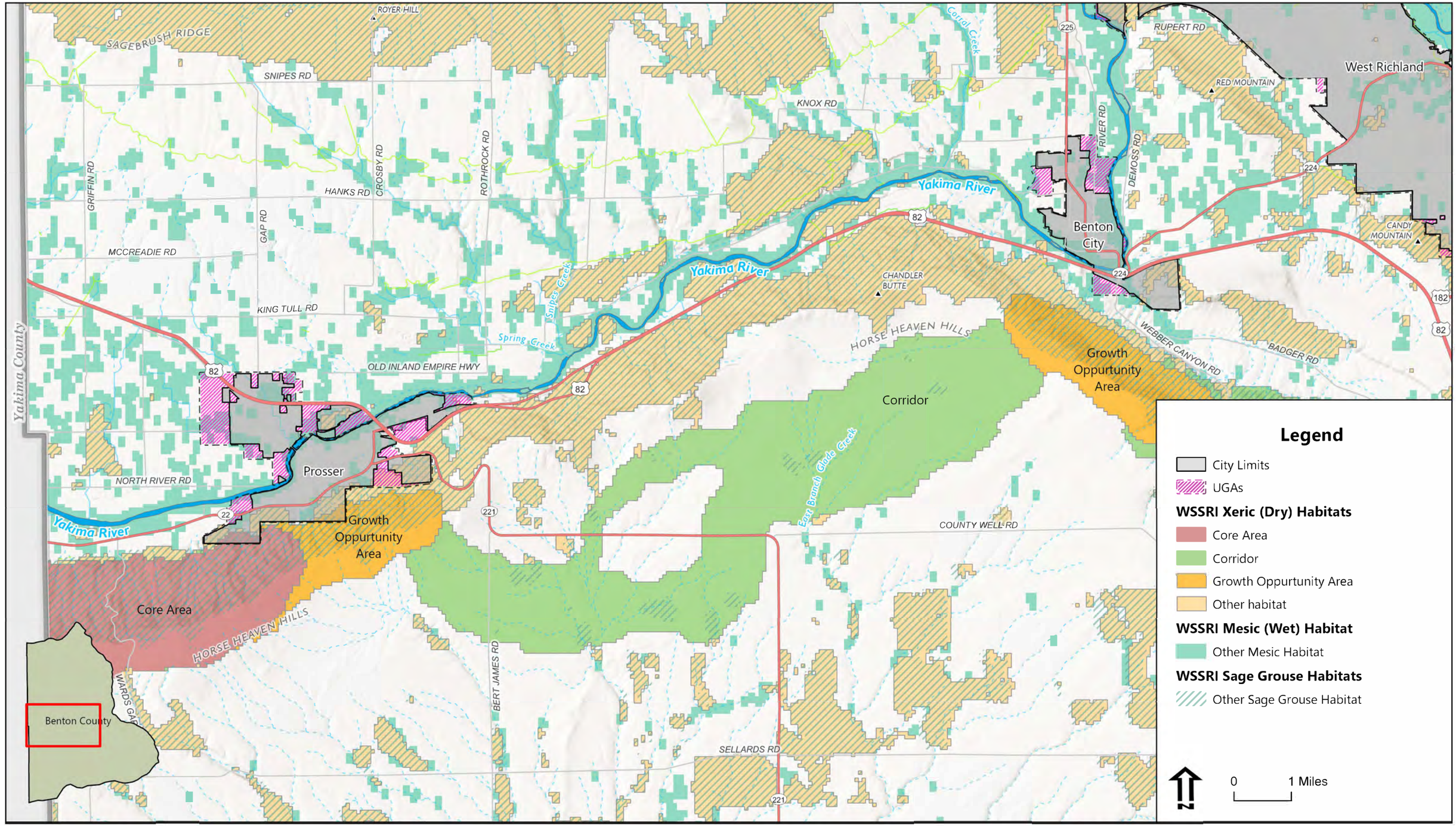


Figure B-10
Prosser - Benton City
Washington Shrubsteppe Restoration and Resiliency Initiative (WSSRI)

AC GEO

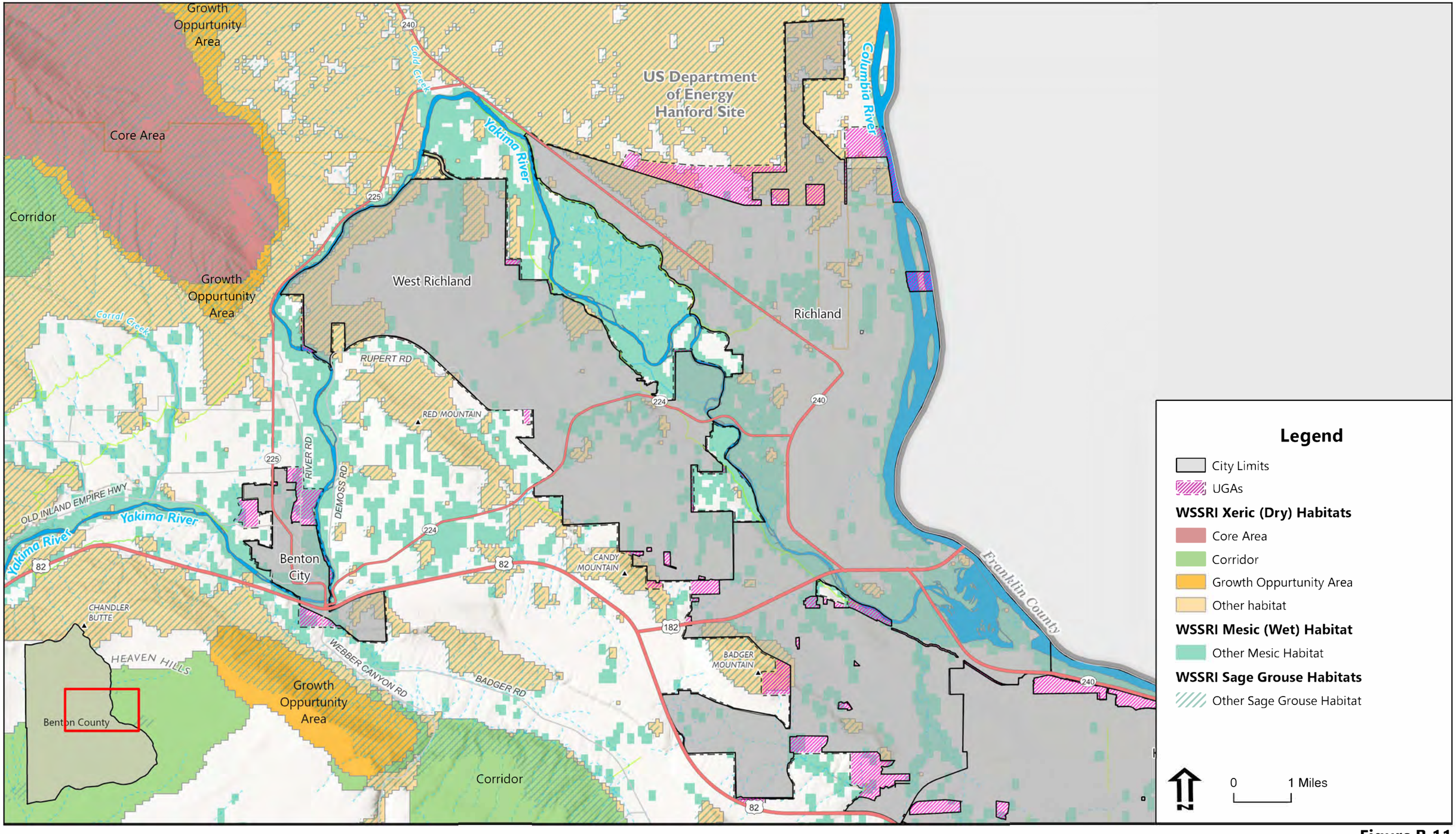


Figure B-11

Benton City - West Richland - Richland

Washington Shrubsteppe Restoration and Resiliency Initiative (WSSRI)

AC GEO

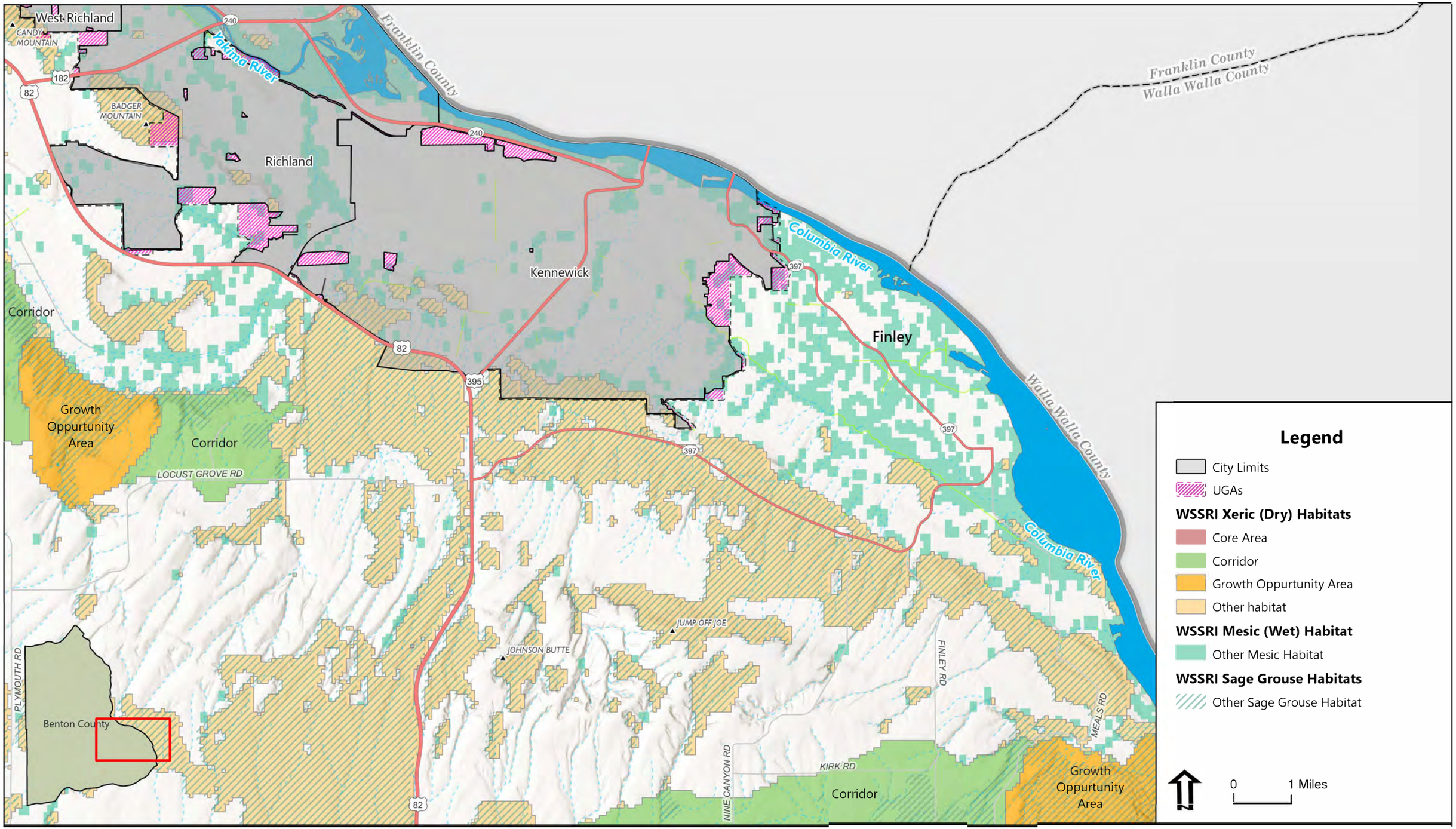


Figure B-12

Richland - Kennewick

Washington Shrubsteppe Restoration and Resiliency Initiative (WSSRI)

AC GEO

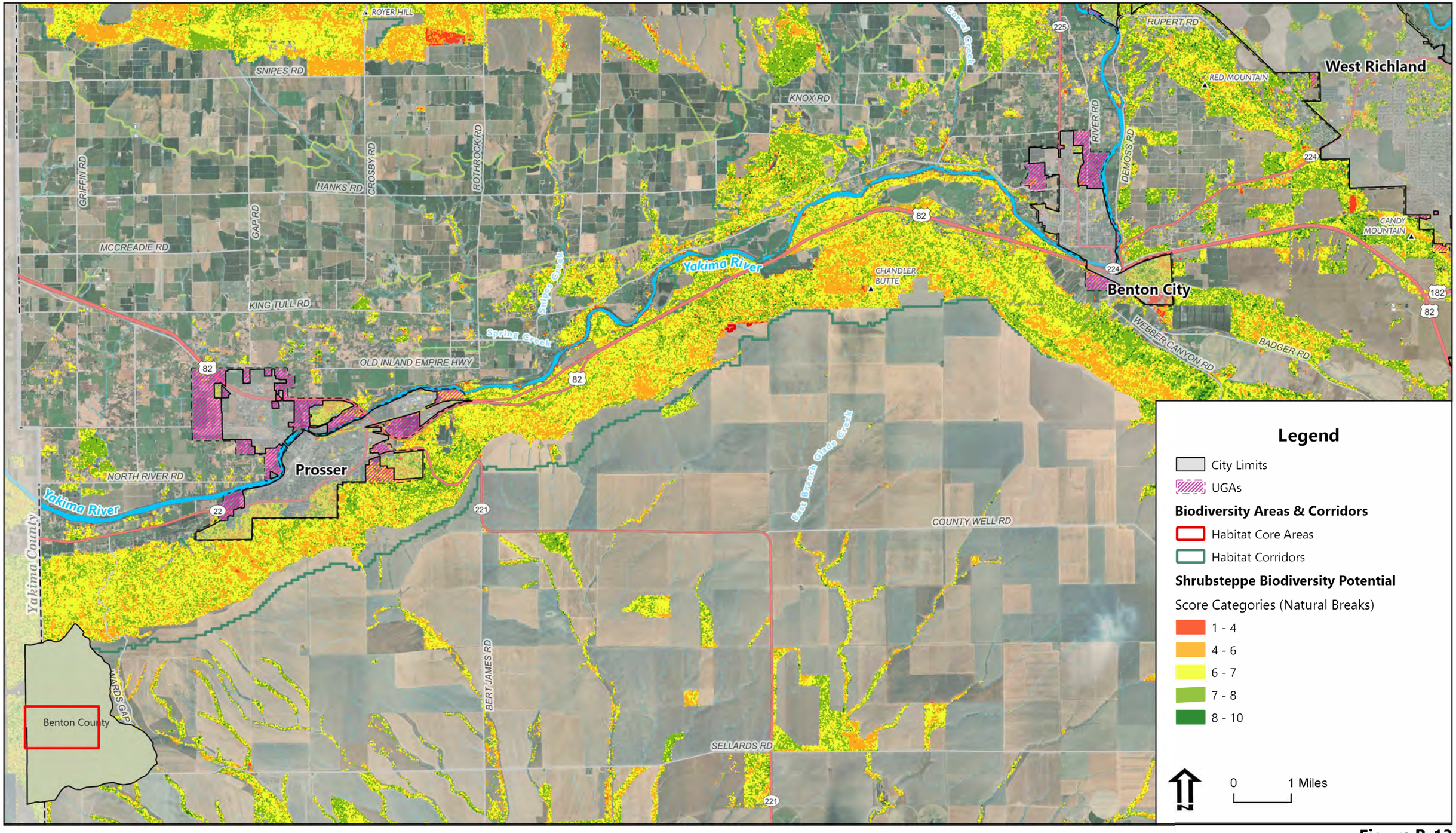


Figure B-13

Prosser - Benton City

Shrubsteppe Biodiversity Potential

AC GEO

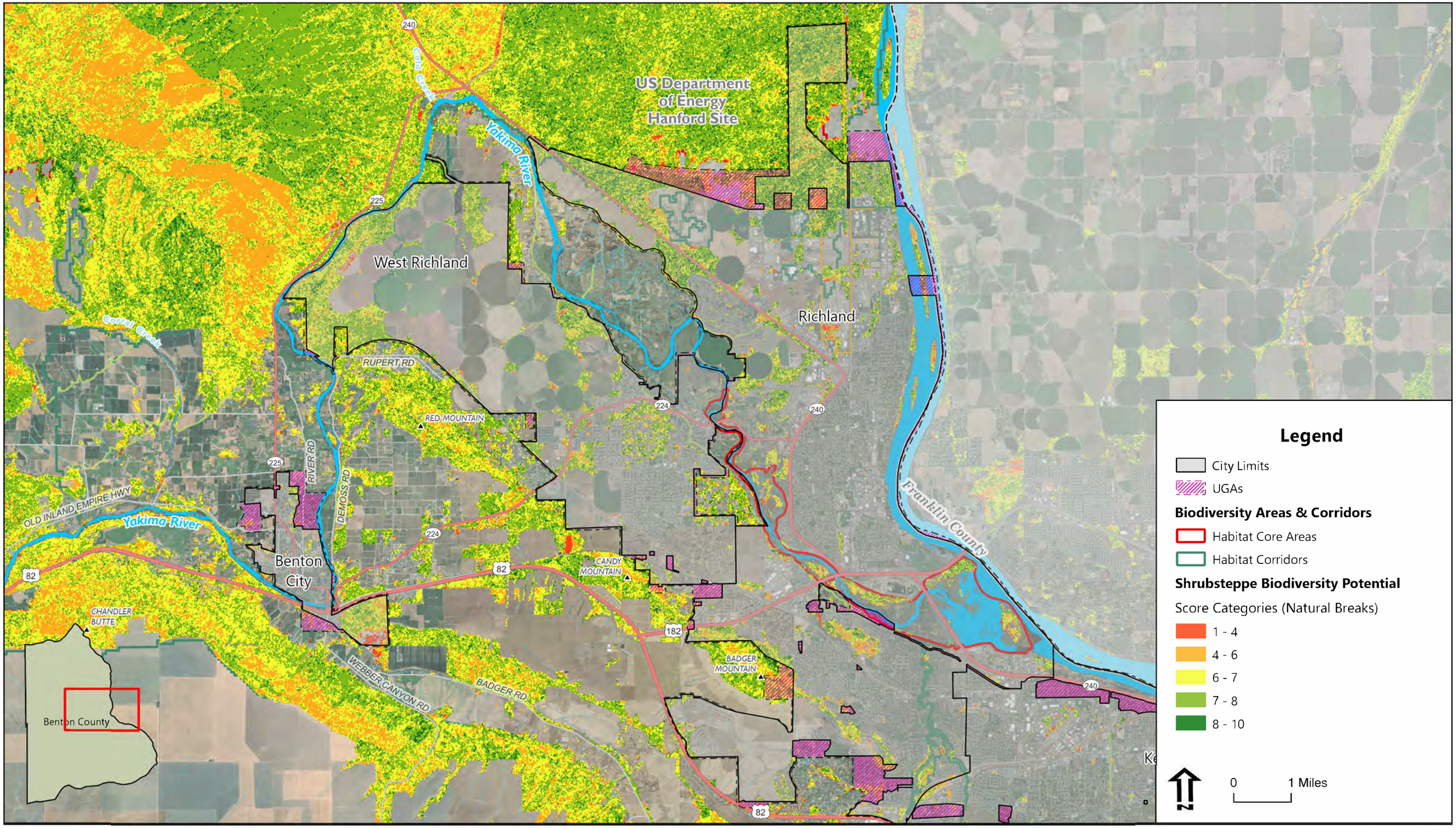


Figure B-14

Benton City - West Richland - Richland

Shrubsteppe Biodiversity Potential

AC GEO

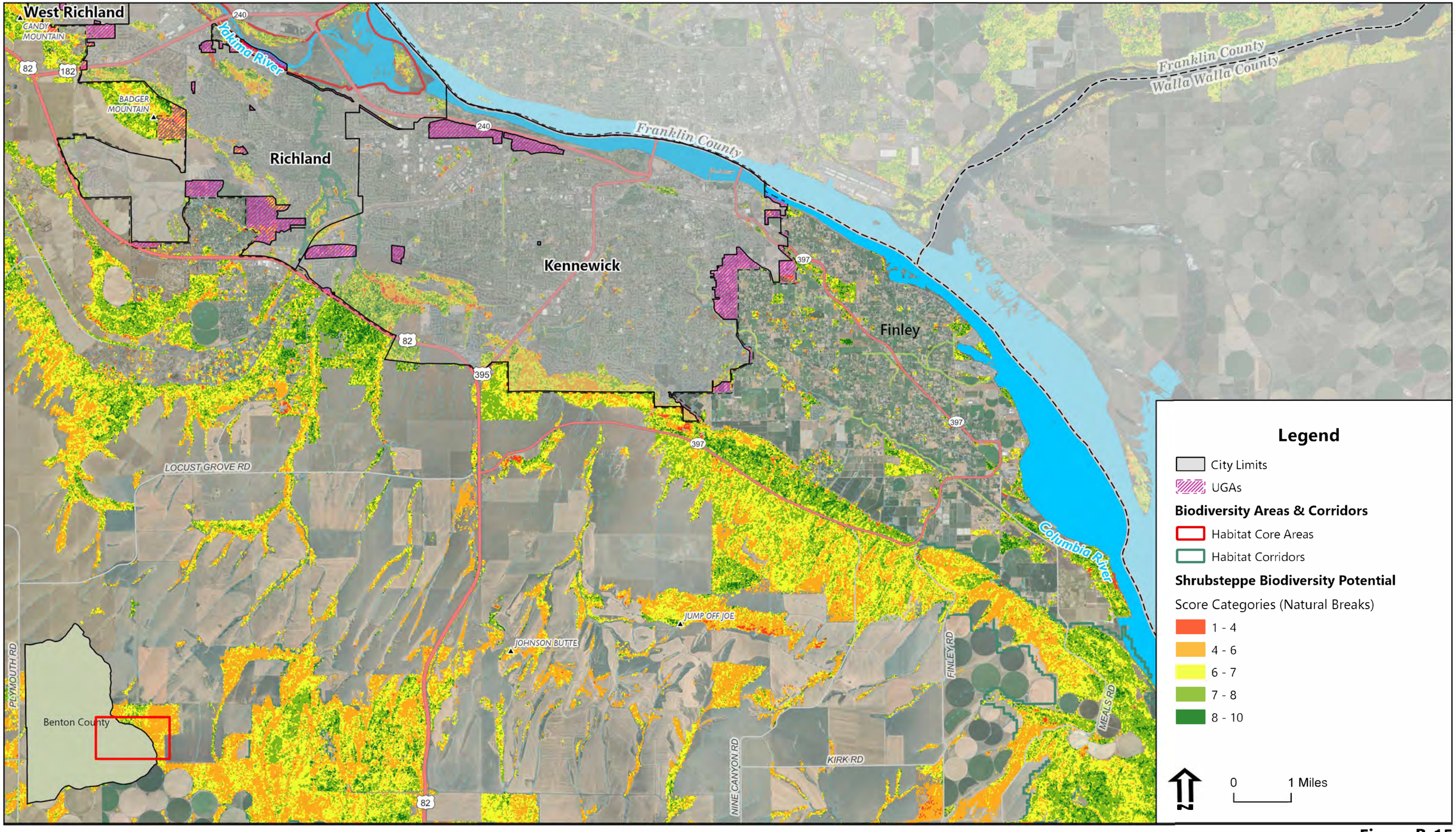


Figure B-15

Richland - Kennewick

Shrubsteppe Biodiversity Potential

AC GEO

Appendix N
Draft Shrubsteppe Mitigation Program Description

DRAFT BENTON COUNTY SHRUBSTEPPE MITIGATION PROGRAM DESCRIPTION

May 1, 2026 Version

Working Draft

Program Purpose and Need

The Growth Management Act 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, require mitigation to offset impacts from removal or degradation of shrubsteppe habitat when developed. If mitigation cannot be accomplished onsite then offsite, compensatory mitigation is required. Additionally, the US Department of Energy and PNNL also have mitigation needs for development in north Richland and the adjoining southern portion of the Hanford Nuclear Reservation.

Per the Washington Department of Fish and Wildlife (WDFW)[1]: "*Shrubsteppe is an arid ecosystem found in Eastern Washington and other western states. This landscape is dominated by rolling, grassy plains, or "steppe" with an overstory of sagebrush and other woody shrubs. On the ground, a fragile community of microscopic organisms form the cryptobiotic crust which locks in moisture and helps prevent erosion. Shrubsteppe landscapes contain many habitat features, including streams, wetlands, rocky talus slopes, canyons, and draws. These features support a variety of plant and animals uniquely adapted to the harsh and sensitive shrubsteppe ecosystem."*

In recent years, several different approaches for addressing 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 Conservation District (Benton CD) to secure mitigation lands either through conservation easement or land acquisition. The contracts and amounts required for mitigation vary among these contracts.

[1] https://wdfw.wa.gov/sites/default/files/2021-01/shrubsteppe_english_jan2021.pdf

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	0.15%
Prosser	103	6	110	1.61%
West Richland	756	2	758	11.07%
Richland	954	47	1,000	14.60%
Kennewick	1,076	6	1,082	15.80%
Benton County			3,889	56.77%
Grand Total	**2,896**	**64**	**6,850**	

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.

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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
- 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 Conservation District developed a **Shrubsteppe Biodiversity Potential (SSBP) model** to evaluate shrubsteppe habitat quality. This model evaluates intrinsic habitat quality and resilience by integrating several key datasets, including LANDFIRE fuel models, fractional vegetation cover data from the Multi-Resolution Land Characteristics Consortium (MRLC), and the Washington DNR's Ecological Integrity Assessment framework. This data provides an initial indication of habitat quality and can be used to evaluate both potential impacts and mitigation opportunities at the County and city scale. Site or parcel-specific findings need to be verified/validated through site evaluation. The dataset is also used in tandem with spatial priority data (such as WSRRI) to prioritize mitigation properties that have a specific combination of quality and spatial priority, e.g., high quality and in a WSRRI core, Growth Opportunity Area, Corridor or Other area.

Washington Shrubsteppe Restoration and Resilience Initiative (WSRRI) Spatial Data

The Washington Shrubsteppe Restoration and Resilience Initiative (WSRRI) provides a comprehensive suite of spatial data to inform habitat protection and restoration actions and investments. The WSRRI approach is built around three core goals: defending high-quality core habitat, expanding the core into adjacent areas, and connecting these cores[2]. To implement this strategy, WSRRI developed spatial priority maps for three distinct conservation targets:

1. The Dry (Xeric) ecosystem, which represents the driest environments composed of sagebrush and perennial grasslands.

[2] Washington Department of Fish and Wildlife. *Washington Shrubsteppe Restoration and Resiliency Initiative*. Retrieved September 24, 2025, from https://wdfw.wa.gov/species-habitats/habitat-recovery/shrubsteppe#mapping

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2. The Wet (Mesic) ecosystem, which includes wetter environments such as wetlands, wet meadows, and riparian habitats.

3. Greater Sage-grouse habitat, which reflects the species' specific life-history needs and is based on empirical data modeling habitat quality and connectivity.

Within each of these three targets, WSRRI classifies habitat 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 Washington Department of Fish and Wildlife 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 (as of September 2025) **PHS shrubsteppe dataset** to inventory the total acres of shrubsteppe that could potentially be impacted by future development. The total acreage of shrubsteppe subject to future development was calculated based on current land use designations within Benton County and its cities. The analysis focused on lands within city limits, Urban Growth Areas (UGAs), and Rural Community Centers and RL-5 zones within the unincorporated County.

The PHS shrubsteppe dataset was then intersected with the Benton County WSRRI/BAC datasets to characterize the full potential area that could be affected by future development within each

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jurisdiction and total for Benton County, organized by the four WSRRI categories and Additional PHS Shrubsteppe, for conditions when WSRRI does not overlap with PHS, as provided in Table 2 and Figures 1 and 2. The summary shows that approximately 80% of the forecasted shrubsteppe impacts occur within "WSRRI Other" or "Other PHS Shrubsteppe" that does not intersect with the WSRRI/BAC areas.

Table 2: Twenty Year Forecast Shrubsteppe Impacts by Jurisdiction & WSRRI Xeric Spatial Priority Area/PHS Biodiversity Areas & Corridors

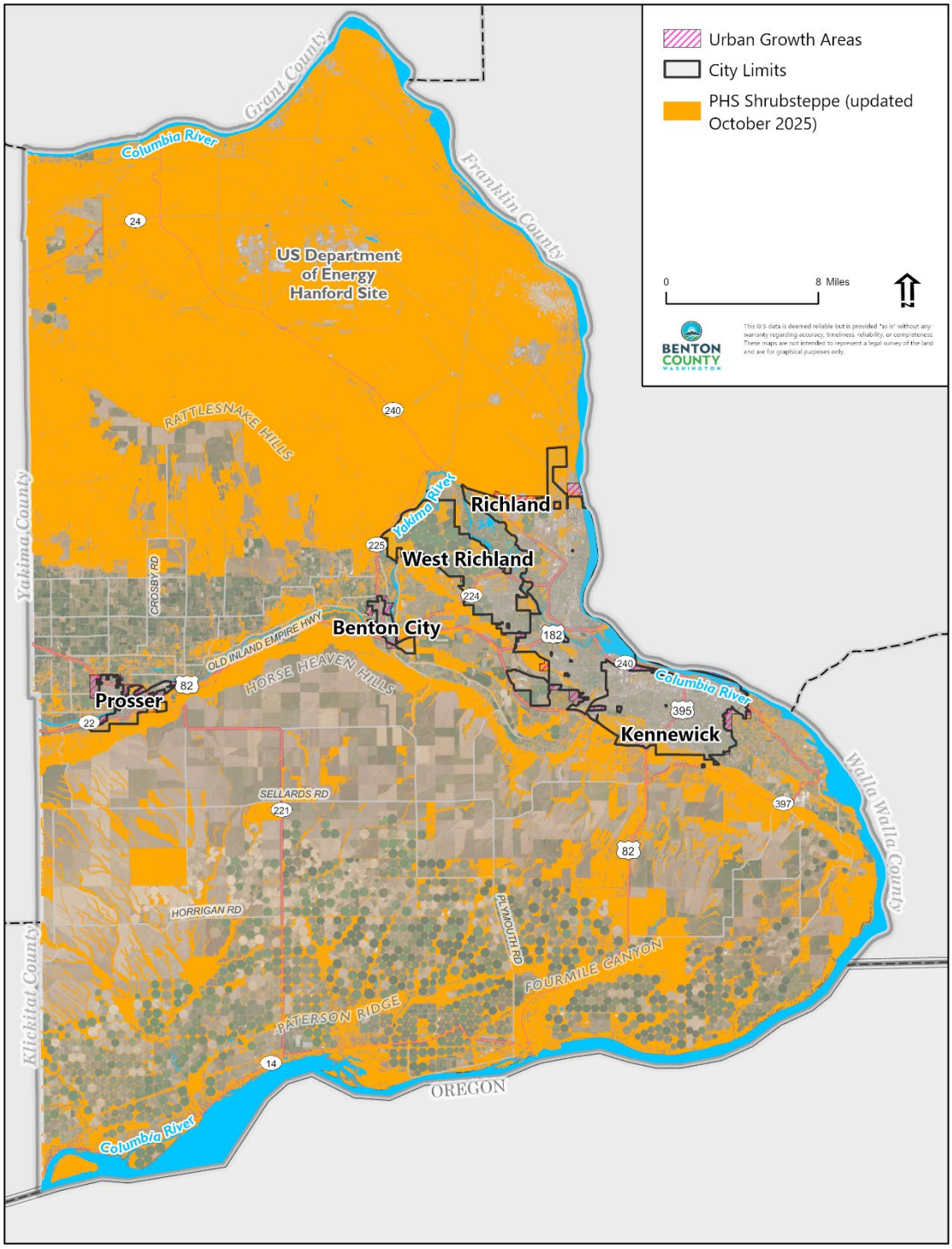
Jurisdictions	Acres	Percent
Benton City (City & UGA)	**10**	**0.15%**
Other PHS Shrubsteppe	*10*	*0.15%*
Prosser (City & UGA)	**110**	**1.60%**
WSRRI/BAC Corridor	*21*	*0.31%*
WSRRI Other habitat	*53*	*0.77%*
Other PHS Shrubsteppe	*36*	*0.52%*
West Richland (City & UGA)	**758**	**11.07%**
WSRRI Other habitat	*196*	*2.86%*
Other PHS Shrubsteppe	*562*	*8.21%*
Richland (City & UGA)	**1,000**	**14.60%**
WSRRI/BAC Corridor	*218*	*3.18%*
WSRRI Other habitat	*165*	*2.41%*
Other PHS Shrubsteppe	*617*	*9.01%*
Kennewick (City & UGA)	**1,082**	**15.80%**
WSRRI/BAC Corridor	*2*	*0.02%*
WSRRI Other habitat	*667*	*9.74%*
Other PHS Shrubsteppe	*414*	*6.04%*
Unincorporated Benton County	**3,889**	**56.78%**
WSRRI/BAC Core Area	*241*	*3.52%*
WSRRI/BAC Corridor	*815*	*11.89%*
WSRRI Growth Opportunity Area	*42*	*0.62%*
WSRRI Other habitat	*1,194*	*17.44%*
Other PHS Shrubsteppe	*1,597*	*23.31%*
Grand Total	**6,850**	**100%**

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.

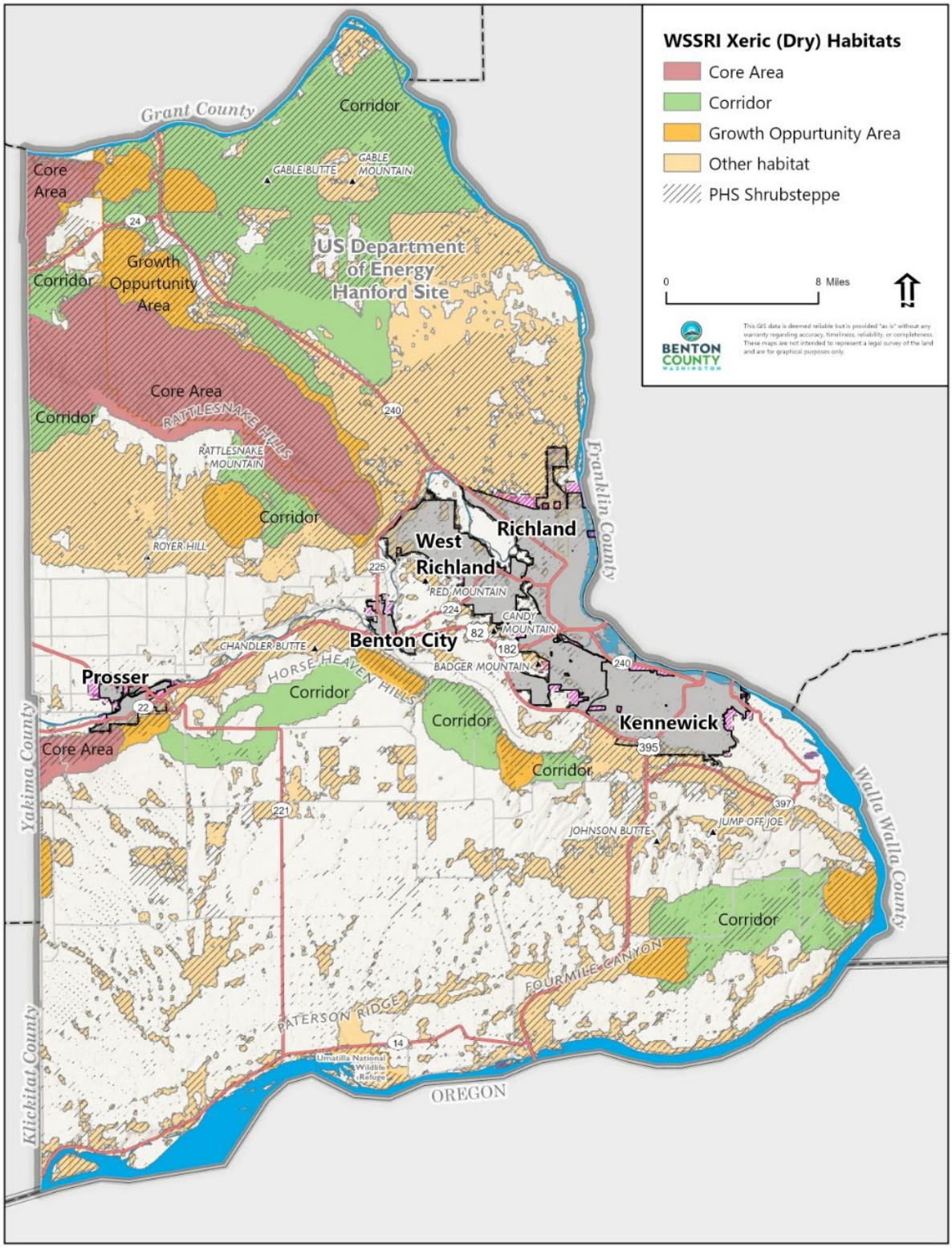
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Figure 1: PHS Shrubsteppe



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)



The Benton CD shrubsteppe habitat quality model was intersected with the PHS and WSRRI shrubsteppe data sets to give an initial quality indication for those areas that could be impacted by future development. Habitat quality scores range from 2 to 10, with a higher value indicating higher habitat quality/ecological function. A summary of the quality and spatial priority of shrubsteppe within each jurisdiction is included in Table 3.

Table 3: Shrubsteppe Quality & Spatial Priority by Jurisdiction

Quality:	Poor	Moderate	Good	High		
Jurisdictions	**1**	**2**	**3**	**4**	**Total**	**%**
Benton City	**0.11**	**0.42**	**10**	**-**	**10**	**0.1%**
Other PHS Shrubsteppe	*0.11*	*0.42*	*10*		*10*	0.1%
Prosser		**26**	**83**	**-**	**110**	**1.6%**
WSRRI Corridor		*6*	*16*		*21*	0.3%
WSRRI Other habitat		*11*	*42*		*53*	0.8%
Other PHS Shrubsteppe		*10*	*26*		*36*	0.5%
West Richland	**12**	**86**	**609**	**51**	**758**	**11.1%**
WSRRI Other habitat	*0.4*	*14*	*168*	*13*	*196*	2.9%
Other PHS Shrubsteppe	*12*	*72*	*441*	*38*	*562*	8.2%
Kennewick	**5**	**214**	**783**	**81**	**1,082**	**15.8%**
WSRRI Corridor		*1*	*0*		*2*	0.02%
WSRRI Other habitat	*0.2*	*102*	*513*	*52*	*667*	9.7%
Other PHS Shrubsteppe	*5*	*110*	*270*	*29*	*414*	6.0%
Richland	**10**	**158**	**724**	**108**	**1,000**	**14.6%**
WSRRI Corridor	*0.13*	*18*	*169*	*31*	*218*	3.2%
WSRRI Other habitat		*10*	*134*	*21*	*165*	2.4%
Other PHS Shrubsteppe	*10*	*130*	*421*	*56*	*617*	9.0%
Benton County	**22**	**601**	**3,123**	**143**	**3,889**	**56.8%**
WSRRI Core Area	*0.13*	*45*	*196*		*241*	3.5%
WSRRI Corridor	*4*	*107*	*682*	*22*	*815*	11.9%
WSRRI Growth Opportunity Area		*5*	*37*	*0*	*42*	0.6%
WSRRI Other habitat	*3*	*152*	*980*	*59*	*1,194*	17.4%
Other PHS Shrubsteppe	*16*	*291*	*1,228*	*62*	*1,597*	23.3%
Grand Total	**50**	**1,085**	**5,332**	**383**	**6,850**	**100.0%**
	1%	16%	78%	6%	100%	

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Table 4: Shrubsteppe Quality & Spatial Priority of Impacted Habitat (20-year Forecast)

Quality: / Jurisdictions	Poor 1	Moderate 2	Good 3	High 4	Grand Total
WSRRI Core Area	-	0.7%	2.9%	0.0%	3.5%
WSRRI Growth Opportunity Area	-	0.1%	0.5%	-	0.6%
WSRRI Corridor	0.05%	1.9%	12.7%	0.8%	15.4%
WSRRI Other habitat	0.05%	4.2%	26.8%	2.1%	33.2%
Other PHS Shrubsteppe	0.62%	9.0%	35.0%	2.7%	47.2%
Grand Total	1%	16%	78%	6%	100%

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 15% 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 potential shrubsteppe mitigation acreage, organized by quality and spatial priority.

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Figure 3: Shrubsteppe Mitigation Parcel Prioritization

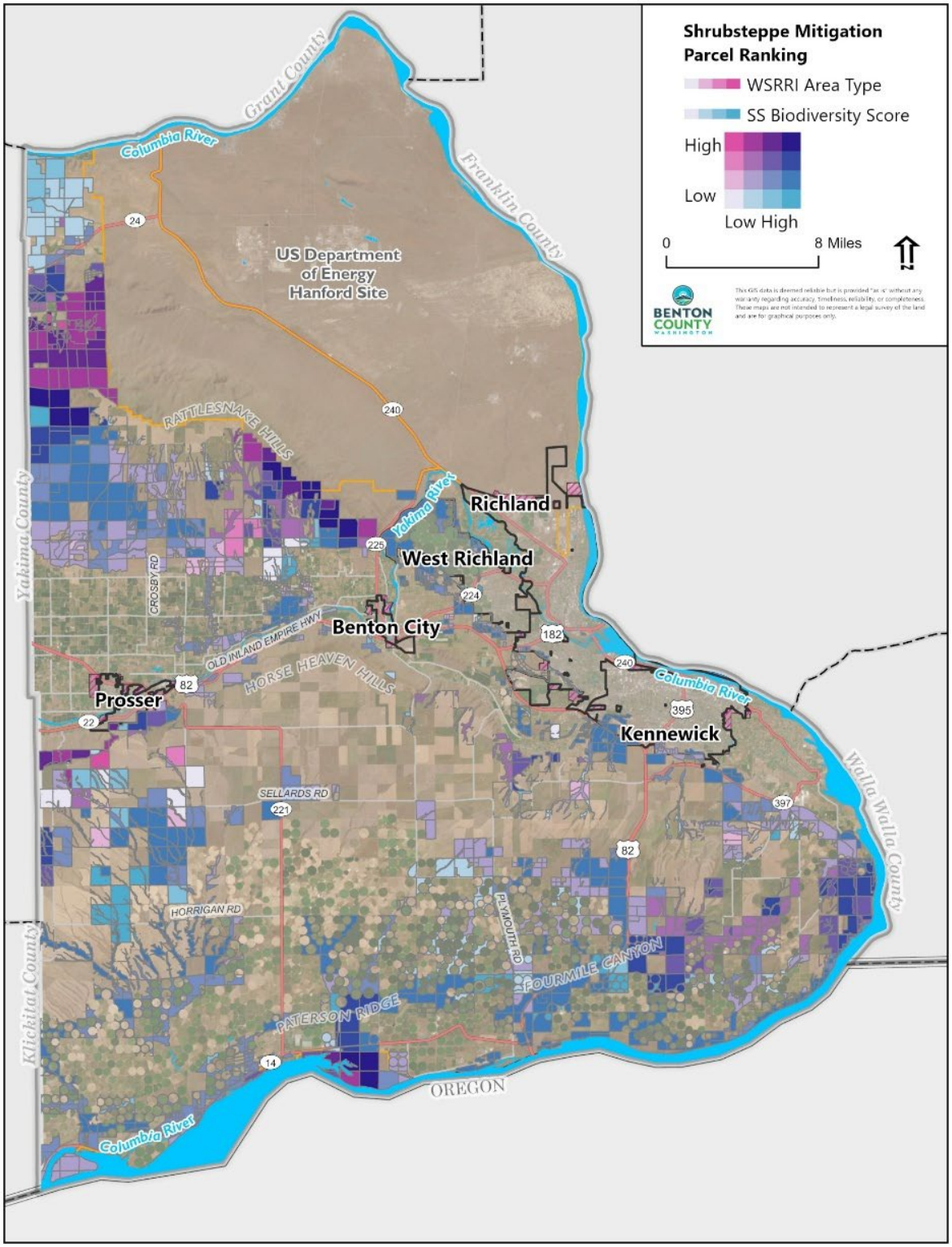


Table 5: Shrubsteppe Quality & Spatial Priority in Potential Mitigation Properties

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 Impact and Mitigation Credits

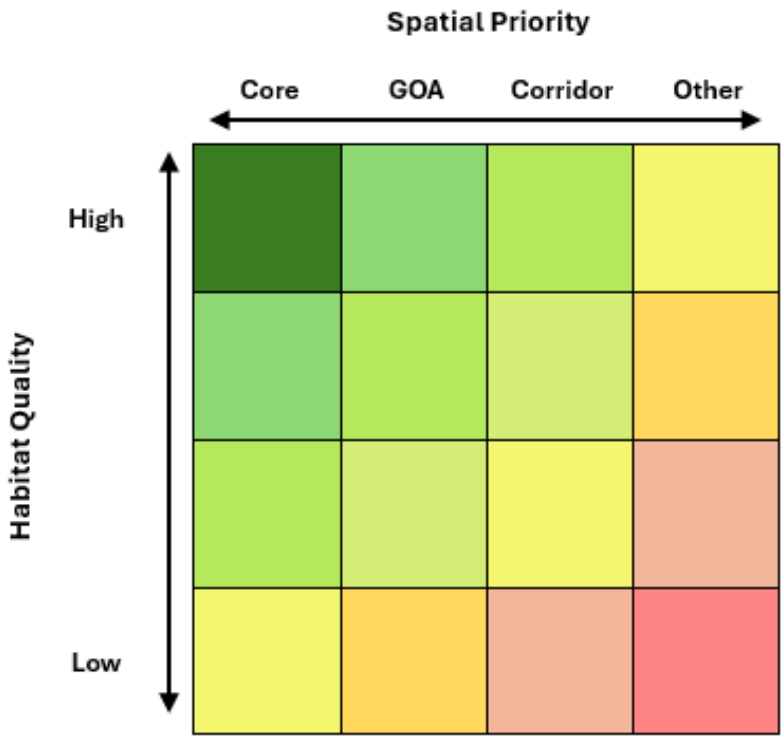
To establish a consistent and transparent method for evaluating impacts and mitigation, the program uses both **spatial priority** (where the site is located relative to core shrubsteppe and connectivity) and **ecological condition** (how well the site currently functions as shrubsteppe habitat). These 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)*
    - **Method used by qualified professionals** preparing critical area reports, that utilizes principles consistent with EIA and BLM AIM but in a more streamlined approach.[3]
    - **Benton CD Shrubsteppe Quality Model,** with field verification and documentation in critical areas report.

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[3] 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



[

At the time of a development application, if there is a potential to impact shrubsteppe habitat, the permitting jurisdiction (County/city) would provide this program description and requirement/methods for calculating impacts and credits 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 and PHS spatial ratings,[4] as applicable, and include a calculation of the number of debits/impacts to mitigation for habitat loss. (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).

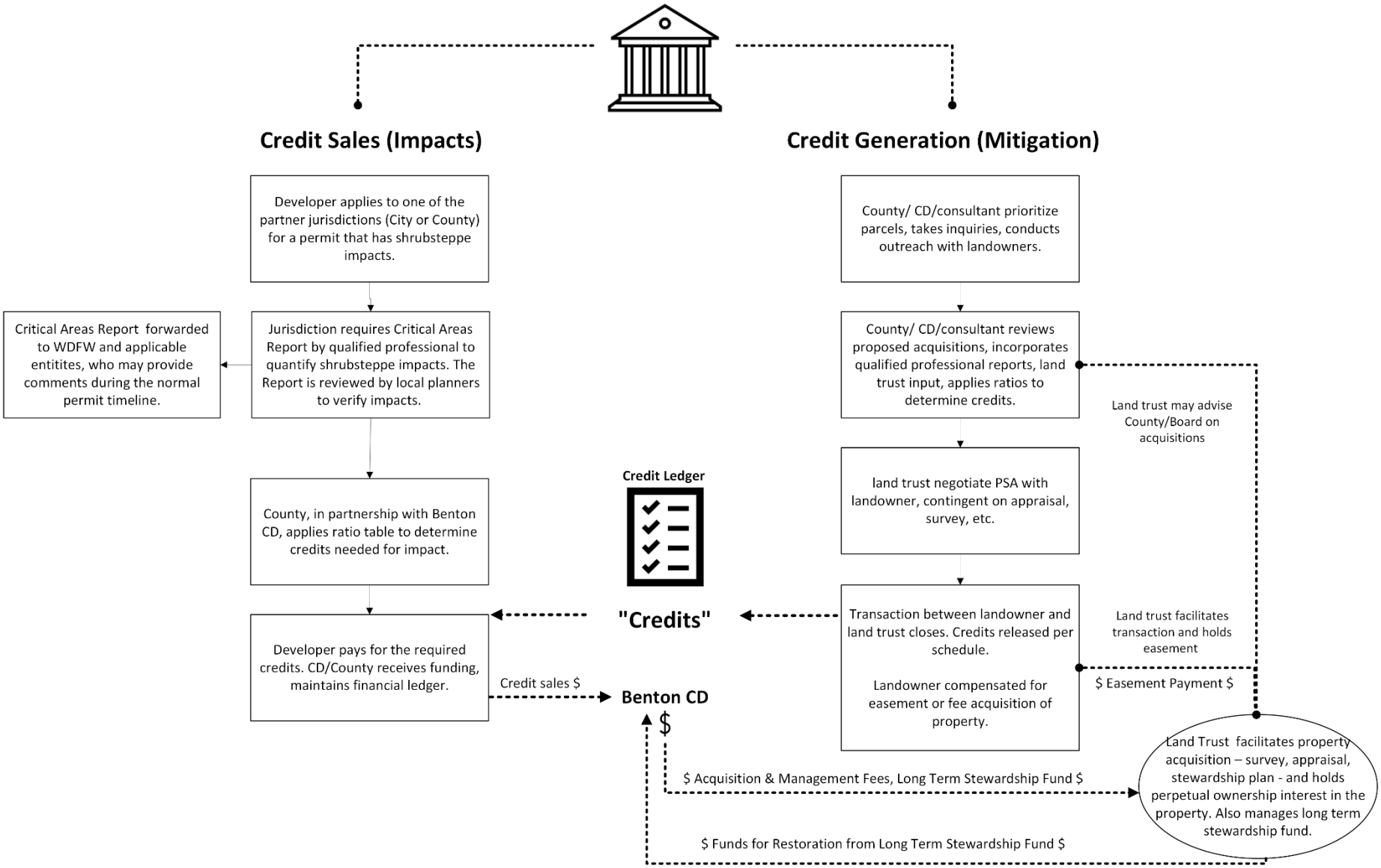
The permitting jurisdiction (County/city) would use the CA report/ mitigation report and calculated debits/impacts and assign the required credits (with associated cost) from the mitigation bank as part of the permit condition. Once the mitigation obligation is finalized, the developer satisfies the

[4] 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.

requirement by purchasing the prescribed number of credits and County/City receives purchase verification. See Figure 5 for a conceptual diagram of the impact and mitigation crediting process and the examples that follow the mitigation impact and credit tables to illustrate how the process might work.

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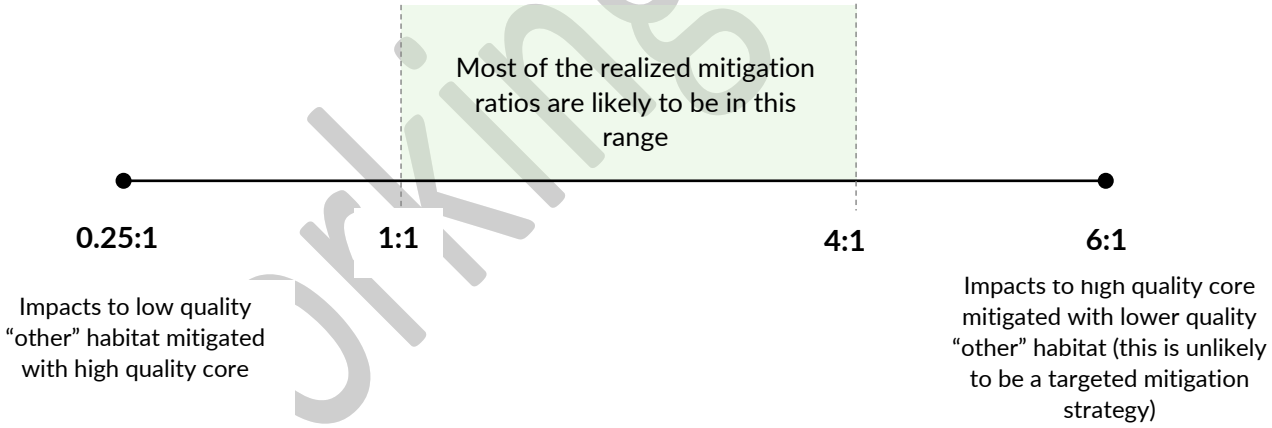
Figure 5: Process Diagram



Calculating Impact and Mitigation Credits

Credits/debits are assigned based on ratios provided in Table 6. 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 (note: some properties may have a range of quality or even spatial priorities, and these would be separated into sub-areas with varied ratios applied). The CA report would also identify the ratio(s) that would be applied from the anticipated impact (vertical column in Table 6), and the required credit as determined in advance for the banked mitigation property with restoration plan that is being permanently protected and enhanced to offset impacts, with its habitat quality and spatial priority (horizontal column in Table 6).

The suggested range of mitigation ratios is structured to incentivize protection of the highest priority shrubsteppe areas and also integrates site-level habitat quality by increasing ratios where higher quality shrubsteppe is impacted or restored. Restoration is also incorporated as a required component of all mitigation actions, consistent with the restoration plan for the mitigation property. The ratios range from 0.25:1 to 6:1, with recommended ratios adapted from ratios in the updated WDFW Wind and Solar Guidance 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.



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Table 6 – Mitigation Impact and Compensation Ratios, by Habitat Quality and Spatial Priority

Impact - Quality	Mitigation Area (with assumed restoration to High reference quality)			
	Core	GOA	Corridor	Other
Core – High/ Good	2:1	3:1	4:1	6:1
Core – Moderate/Poor	1:1	1.5:1	2:1	3:1
GOA – High/ Good	1:1	2:1	3:1	4:1
GOA – Moderate/Poor	.5:1	1:1	1.5:1	2:1
Corridor – High/ Good	.7:1	1.3:1	2:1	2.7:1
Corridor – Moderate/Poor	.3:1	.5:1	1:1	1.5:1
Other – High/ Good	.5:1	.7:1	1:1	2:1
Other – Moderate/Poor	.25:1	.3:1	.5:1	1:1

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Rationale for Mitigation Ratios

The mitigation ratios are structured to meet key ecological and implementation objectives through the following:

- **Provides mitigation ratios that have incorporated restoration to a "High" reference quality for mitigation banked lands**, ensuring the program is providing functional lift/increased habitat quality to achieve a net ecological benefit.
- **Uses higher ratios to offset impacts to higher value habitats**, with mitigation ratios for impacts to high quality Core Habitat up to 6:1.
- **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.

- **Incorporates restoration and reestablishment of shrubsteppe on each mitigation parcel consistent with a restoration plan (to be developed) to promote overall functional lift**, ensuring mitigation actions improve habitat condition rather than simply preserve existing conditions.
- **Prohibits 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.

Mitigation Bank Establishment and Impact

This section includes two examples to illustrate how the quality, spatial priority, debit and credit process would work.

These examples are based upon the shrubsteppe mitigation program partners – County/City/CD and WDFW – coordinating on the identification of a property and establishing a conservation easement on **500 acres** of shrubsteppe habitat within a **WSRRI Growth Opportunity Area**, meaning that strategic restoration here could increase habitat quality and result in additional core habitat. A habitat quality assessment was conducted, along with other property due diligence steps, using an accepted methodology and translates to a standardized **"Moderate"** quality score. The bank transaction includes built-in funding to plan and implement shrubsteppe restoration through Benton CD (assumed for this example), and the restoration activities are expected to move the overall quality of habitat to **"High"** reference condition over the next 5-10 years as additional credits are purchased. Each credit assumes a certain amount of the mitigation cost will be for property restoration, with the amount/percentage of restoration costs to be determined in the future based upon a mitigation property-specific restoration plan agreed to by the partner agencies, including WDFW.

Impact Example 1

A proposed project impacts **10 acres** of shrubsteppe habitat near an urban area that is mapped as **WSRRI "Other" habitat**. Shrubsteppe habitat in this area is already largely fragmented by the human footprint. Using an appropriate habitat assessment method, the critical areas report assesses the quality of shrubsteppe on the parcel as "near reference" quality, which translates to a standardized score of **"Good".** The acres are multiplied by the corresponding ratio in Table 6. The formula for calculating acre-debits is **10 acres of impact at a .7:1 ratio = 7 acre-credits to offset impacts. The developer would pay for 7 credits at an assumed cost of $4,000 per acre, or $28,000, for this example.**[5]

Impact Example 2

A proposed project impacts **5 acres** of shrubsteppe habitat in area that is mapped as **WSRRI "Core" habitat**. Using an appropriate habitat assessment method, the critical areas report

[5] Mitigation bank property per acre credit costs are unknown until an actual property is permanently protected and a restoration plan has been developed and approved with known restoration costs. Currently mitigation costs per acre in agreements Benton CD has with local jurisdictions and PNNL range from $3,500 to $4,000 per acre.

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assesses the quality of shrubsteppe on the parcel as "near reference" quality, which translates to a standardized score of **"Good".** The acres are multiplied by the corresponding ratio in Table 6. The formula for calculating acre-debits is **5 acres of impact at a 3:1 ratio = 15 acre-credits to offset impacts. The developer would pay for 15 credits at an assumed cost of $4,000 per acre, or $60,000 for this example.**[6]

Accounting for Restoration/ Enhancement

A banked property mitigation credit begins with preservation as the baseline on any mitigation property. Restoration planning and implementation is planned to be built into every mitigation bank acquisition. Mitigation credits for restoration would be based upon taking the baseline condition to the "High" reference habitat condition for the property. A release of additional credits would occur once restoration is completed and high function achieved, consistent with an established credit release schedule, which is further described below. For example, if a poor-quality site within a WSRRI core is restored to "High" quality per EIA or BLM AIM, the associated credits would move up to the "High" quality for Core, with the additional mitigation bank credits released after the initial restoration has occurred and associated performance metrics are being met. This ensures that restoration results in actual functional lift measured on a consistent quality scale. Mitigation property specific and ultimately program-wide monitoring would be performed to validate these conclusions.

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 Table 6. 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.

Credit Release Staging

Credit release for mitigation is tied to verified conditions. Projects that only involve preservation 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.

[6] Mitigation bank property per acre credit costs are unknown until an actual property is permanently protected and a restoration plan has been developed and approved with known restoration costs. Currently mitigation costs per acre in agreements Benton CD has with local jurisdictions and PNNL range from $3,500 to $4,000 per acre.

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Credit Release Schedule

Stage	Credit Release Condition	Credits Released
1	Conservation easement secured	50%
2	Activity-specific implementation complete	25%
3	Follow-up EIA/AIMs/other habitat assessment shows progress toward quality benchmarks	25%

Establishing Per Credit Cost

Mitigation credit costs are under development and will be specific to the actual mitigation property (ies) permanently protected. 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.

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.

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.

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Monitoring and Adaptive Management

Because this is a new program that is still under development and that brings together new partners and processes, adaptive management and program refinement should be expected. Program participation, mitigation program effectiveness in achieving no net loss of ecological functions for shrubsteppe habitat, and actual costs will all be monitored and reviewed at last annually, with potential adjustments identified for program improvement.

Additionally, the program, due to GMA deadline requirements, is also being developed and implemented ahead of WDFW's updated guidance and management recommendations for shrubsteppe habitat protection and mitigation. Additional program refinements may occur once that guidance is finalized.

Monitoring and adaptive management will also be a part of the ongoing mitigation land stewardship and restoration efforts.

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Appendix

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.

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- **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.

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Appendix O
Wildland Urban Interface Memorandum

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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**.

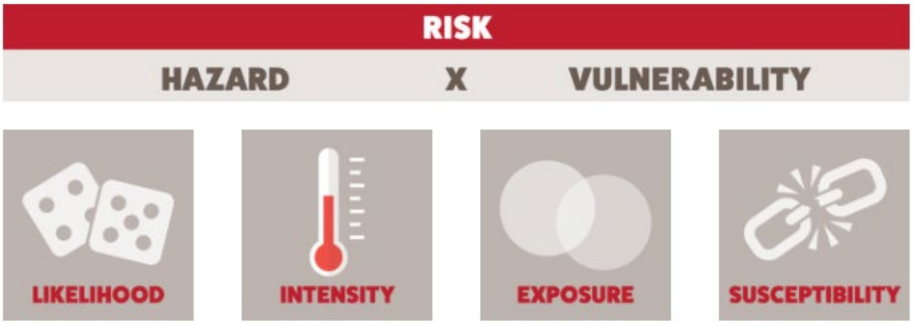
WILDFIRE HAZARD:
"How likely is fire behavior to occur here?"

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

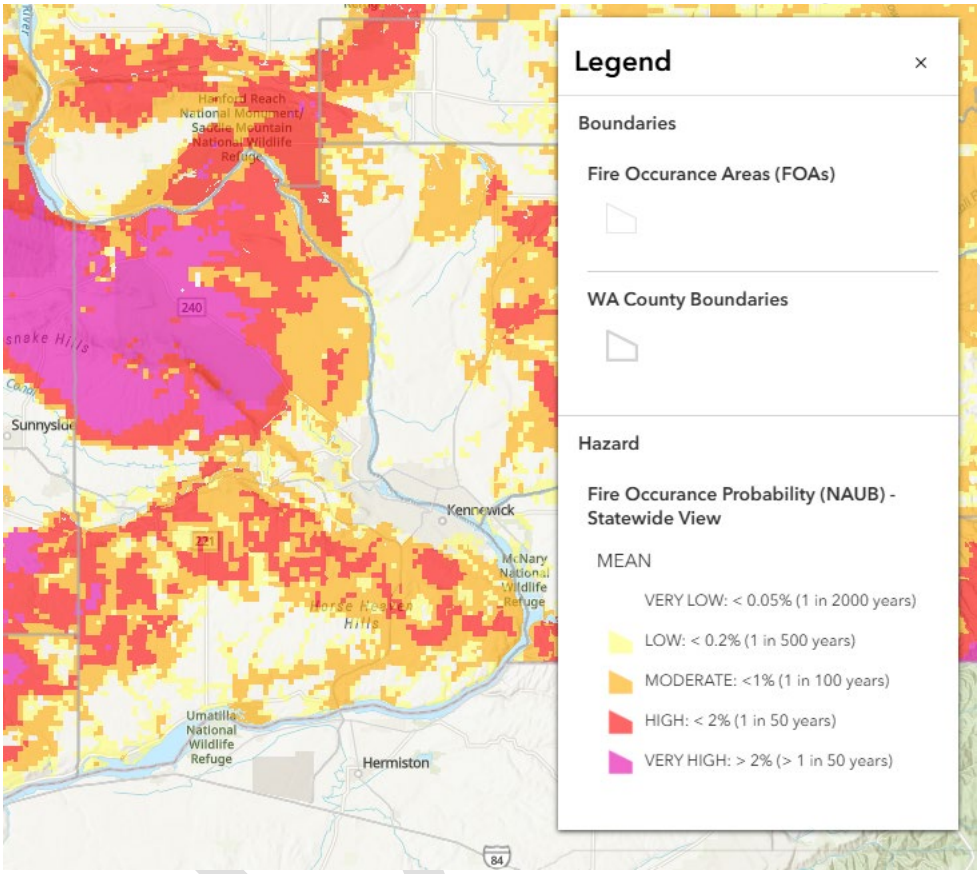
[5] Based on DNR WUI Steering Committee Notes from 9/4/25 and presentation materials at February 10th, 2026 listening session.

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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)

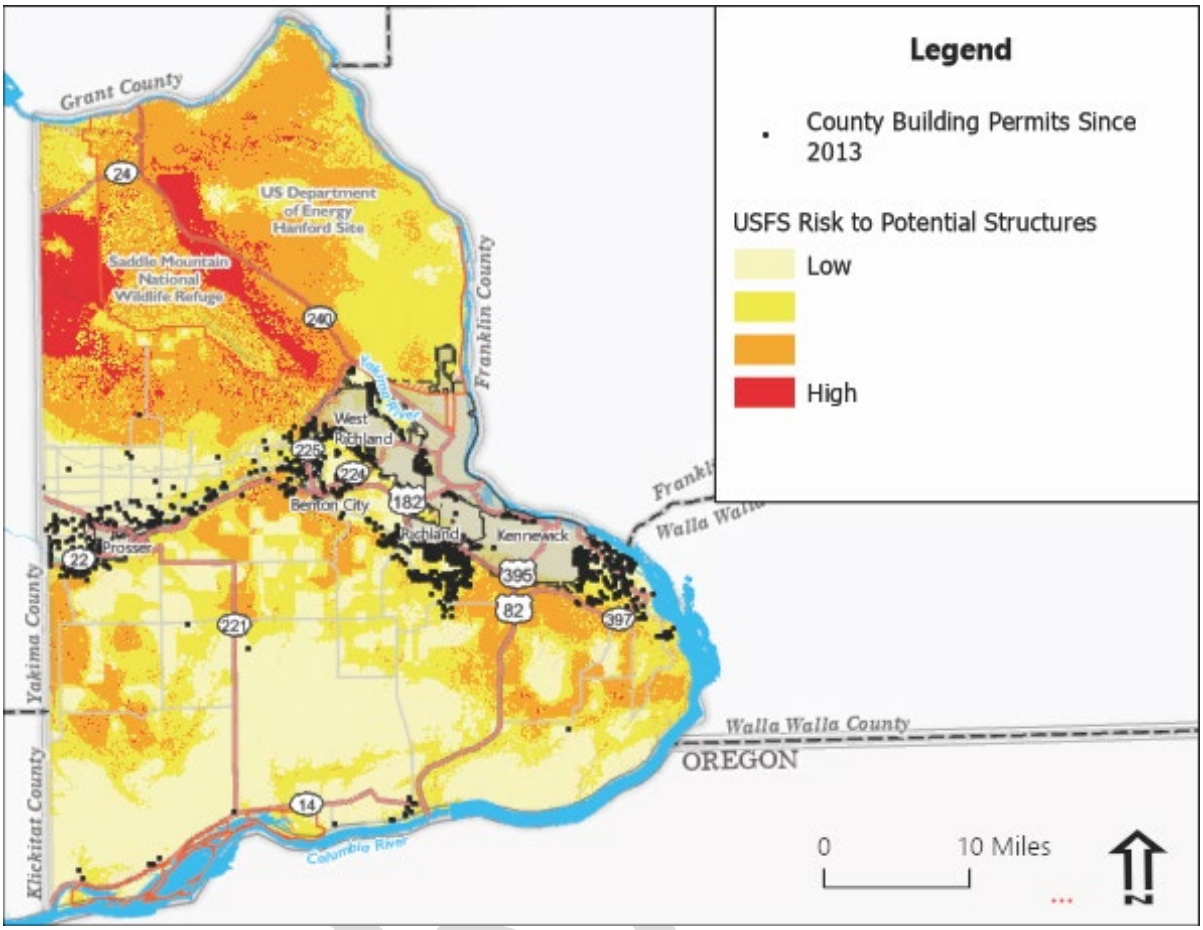
Local jurisdictions may adopt additional portions of the WUI Code, but standards may not exceed state minimum requirements. Jurisdictions may also develop local hazard and risk maps, provided they are consistent with state criteria.

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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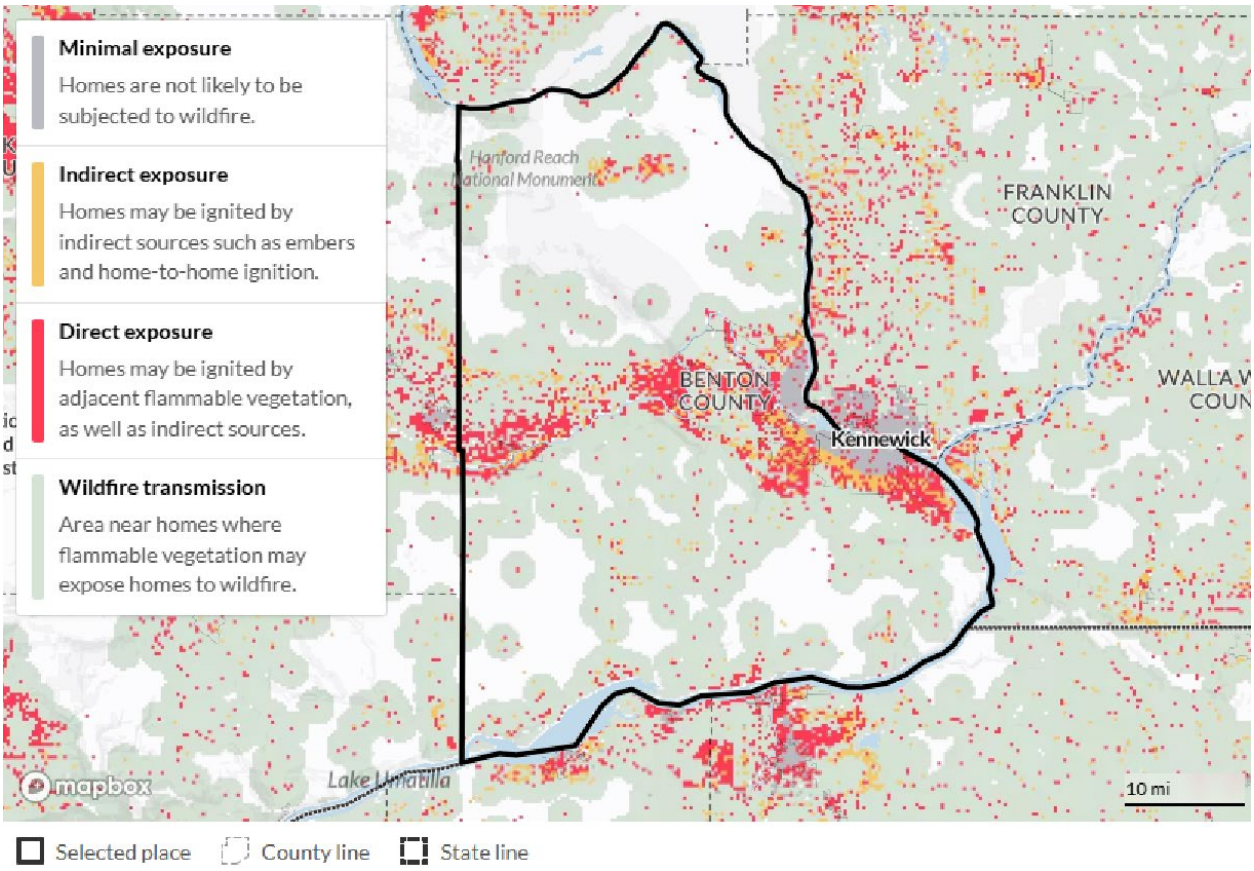
Figure 3: Wildfire Risk to Potential Structures



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

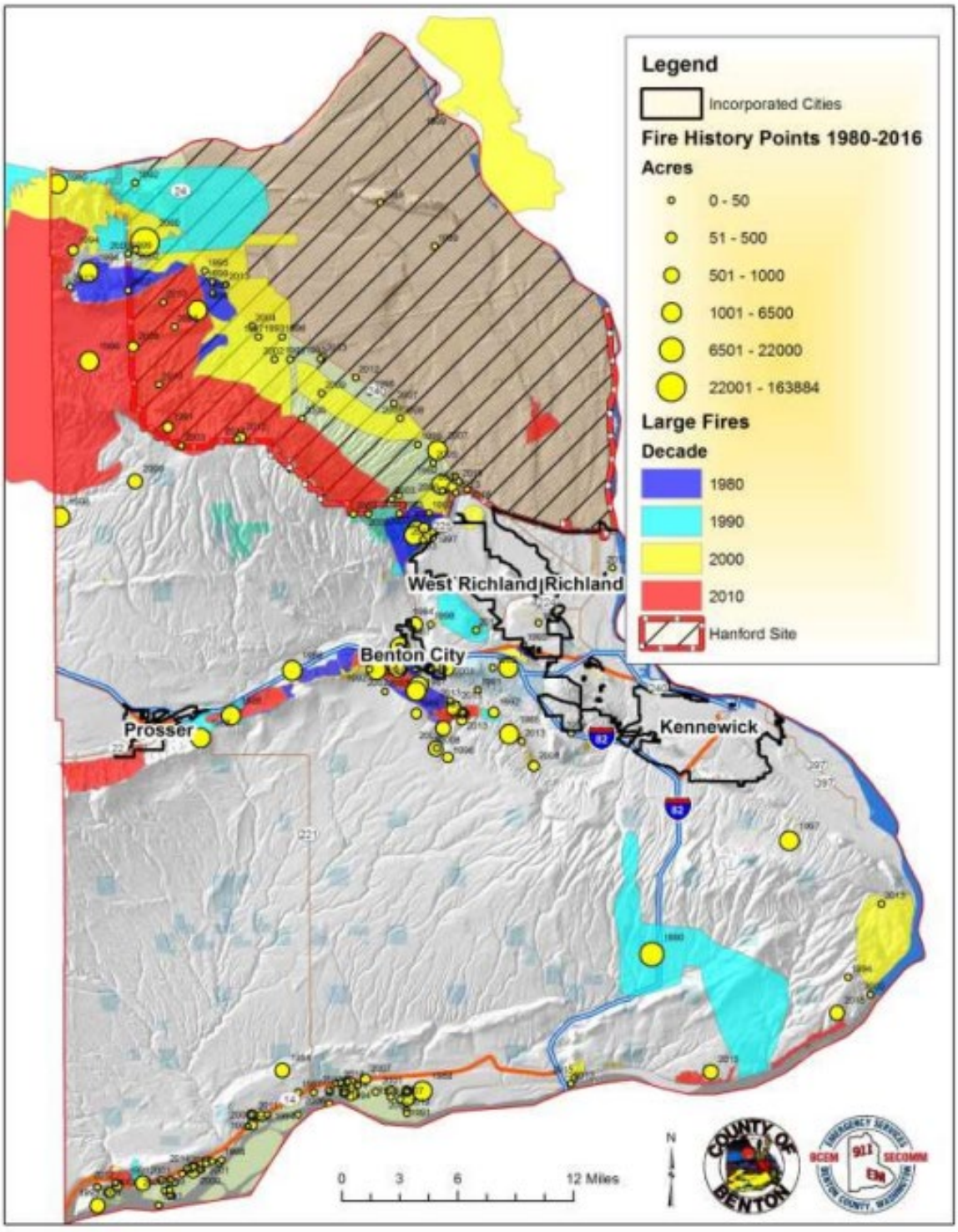
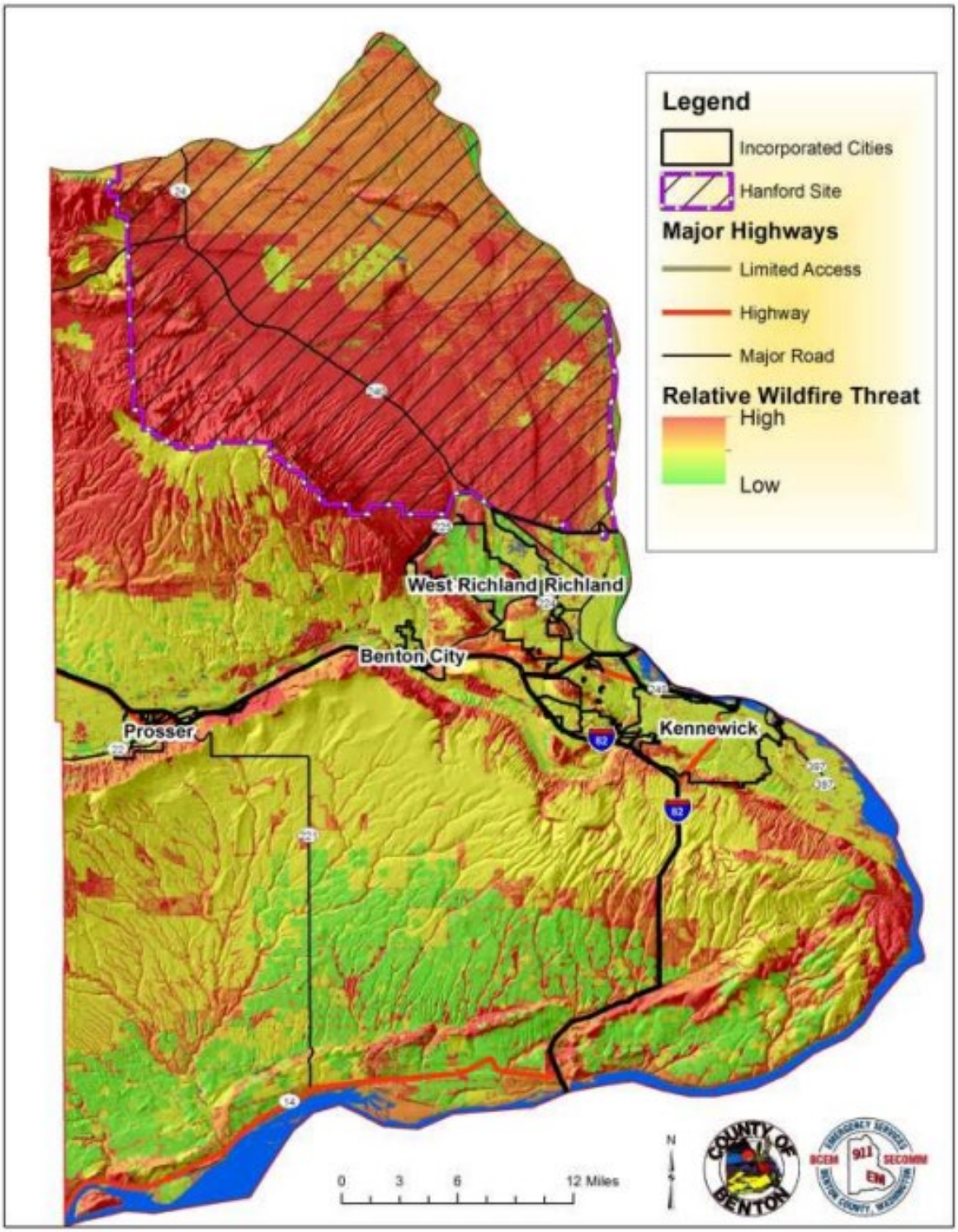


Figure 6: Relative Wildfire Threat Map, CWPP pg. 63



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:

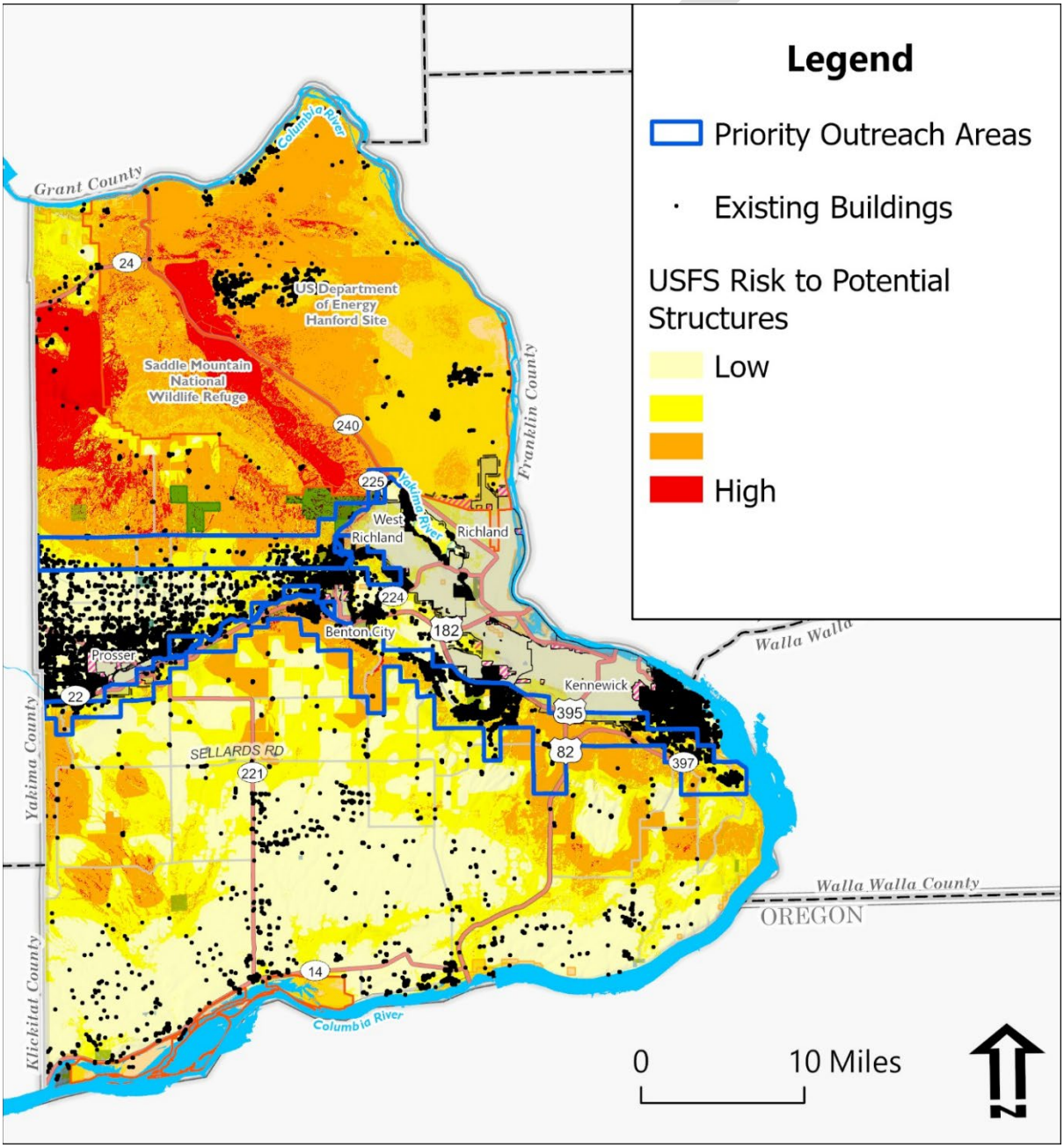
- 1 page Firewise pamphlet titled "How to Prepare Your Home for Wildfires"
- Firewise guide to completing the Firewise USA Community Risk Assessment
- 1 page Community Planning Assistance for Wildfire *Own Your Zone* Pamphlet
- Ready, Set, Go Wildfire Preparedness for Farmers and Ranchers Resource (available in English and Spanish)
- Ready, Set, Go, Resource for the Seasonal Resident and Property Owner
- DNR Fire Resistant Plants for Eastern Washington

DRAFT

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.

DRAFT

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)

DRAFT

Community Development Department
102206 East Wiser Parkway
Kennewick, WA 9933

Planning Division
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Planning.department@co.benton.wa.us

Received
NOV 26 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.

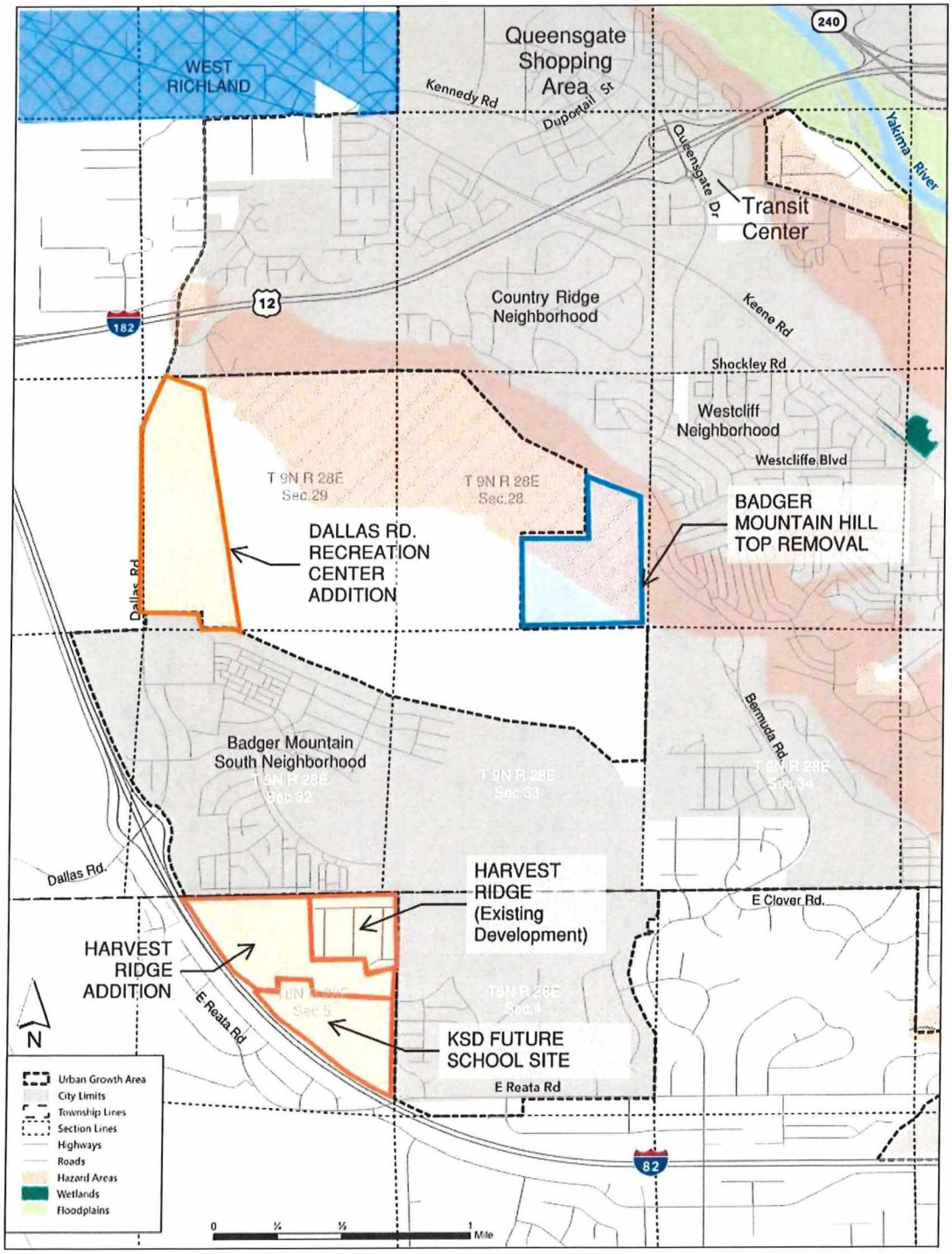


Exhibit A: Site Map with surrounding features, selected critical areas (Prepared 11/25/25)
Note: Critical Aquifer Recharge Areas are not shown; See Exhibit C for Priority Habitat Areas per WDFW



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

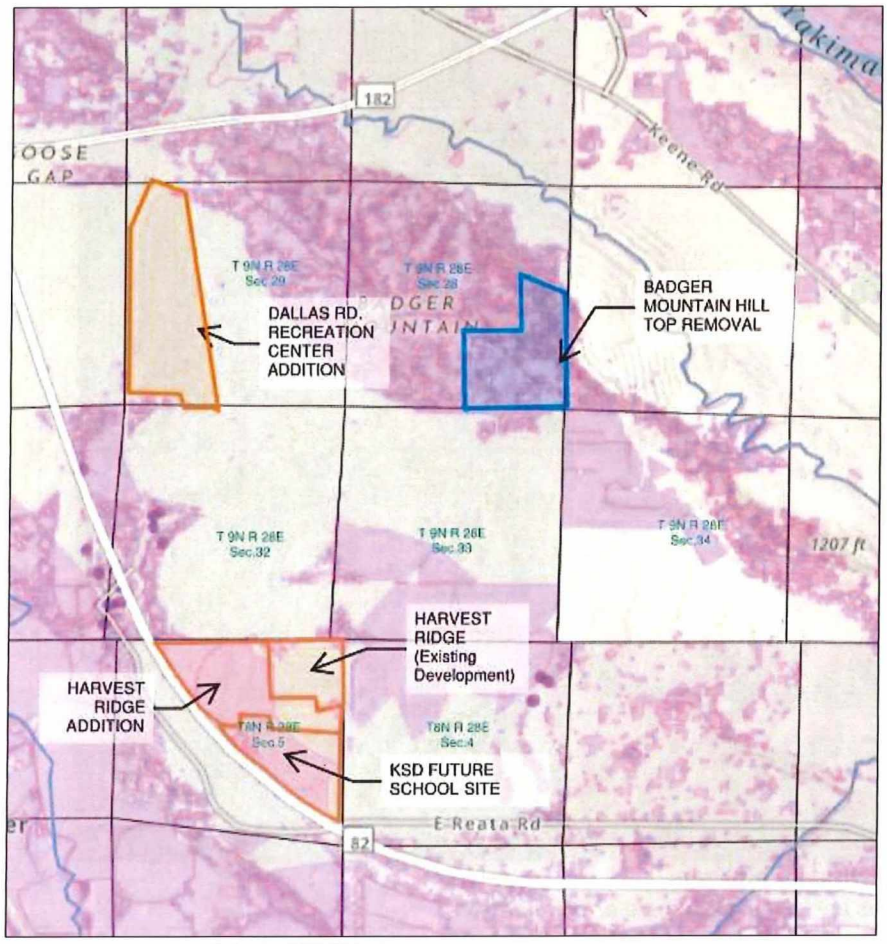


Exhibit C: WDFW Mapped Habitat Areas with annotations (Prepared 11/25/25)



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

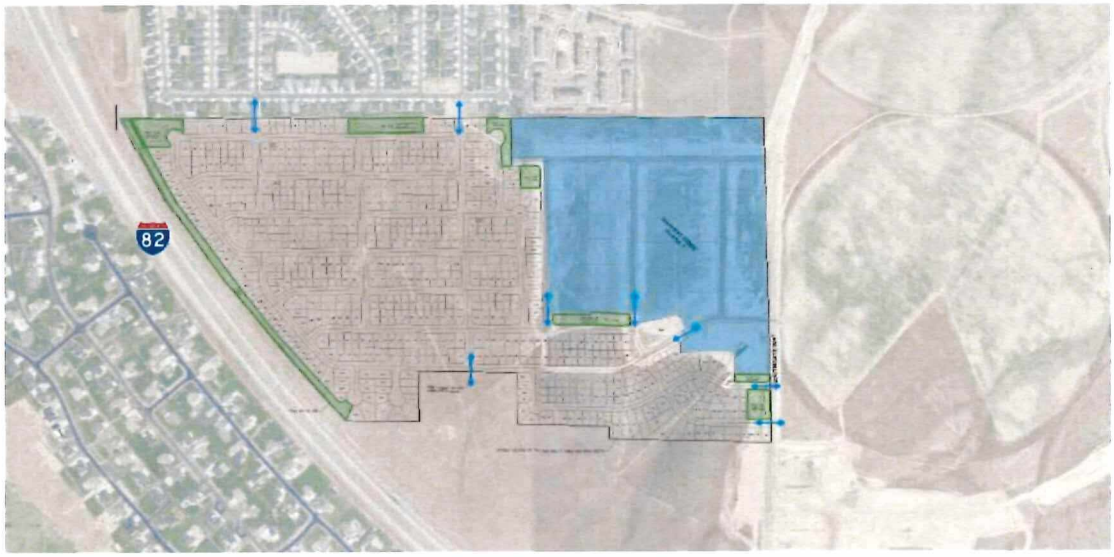


Exhibit E: Harvest Ridge Addition Concept
(Prepared 11/25/25*)*
Note: This is a very preliminary conceptual example demonstrating that the standard of a min. 6 DU/ acre can be achieved; the image shows 611 lots, potential open space areas, and a potential vehicular circulation approach)

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

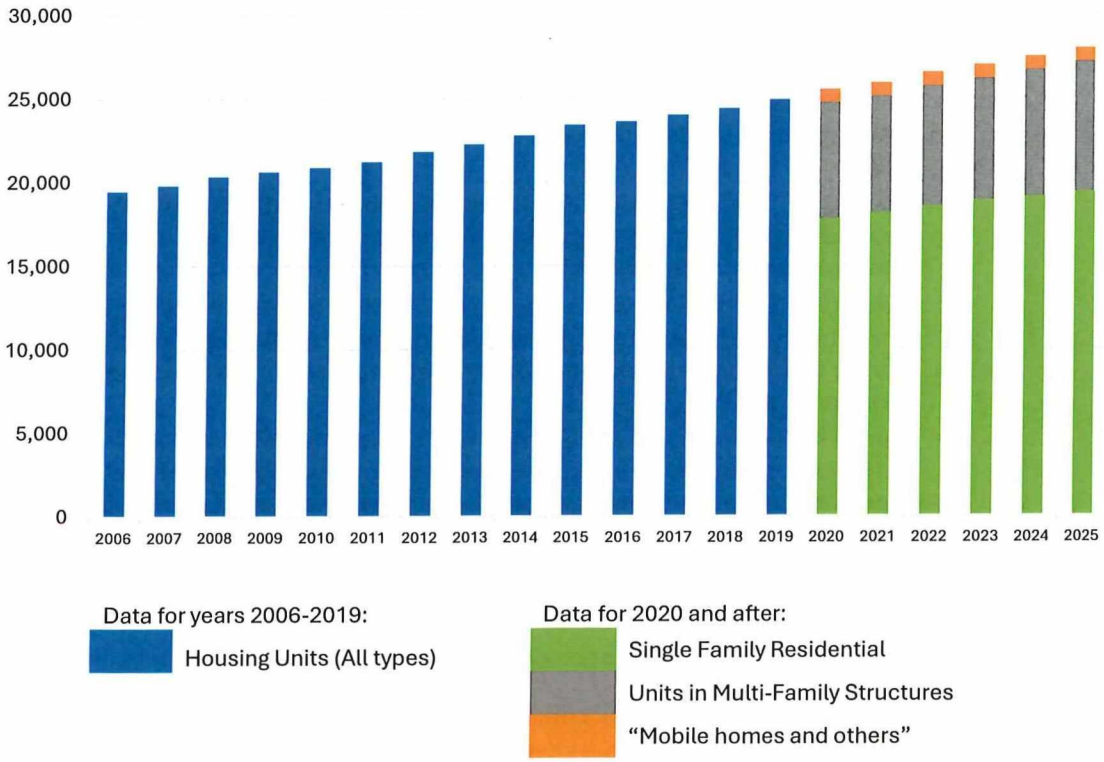
and also to avoid costly extension of infrastructure that would have fewer efficiencies elsewhere.

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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APPLICANT'S CHECKLIST FOR COMPLETENESS

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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

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

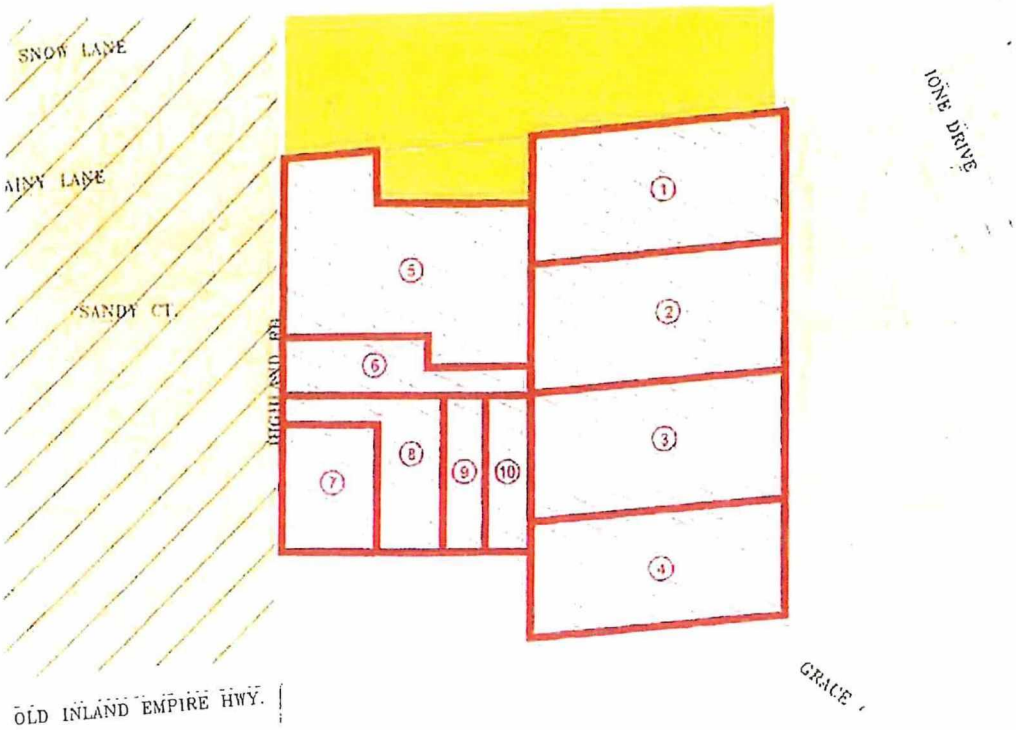
Attest:

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

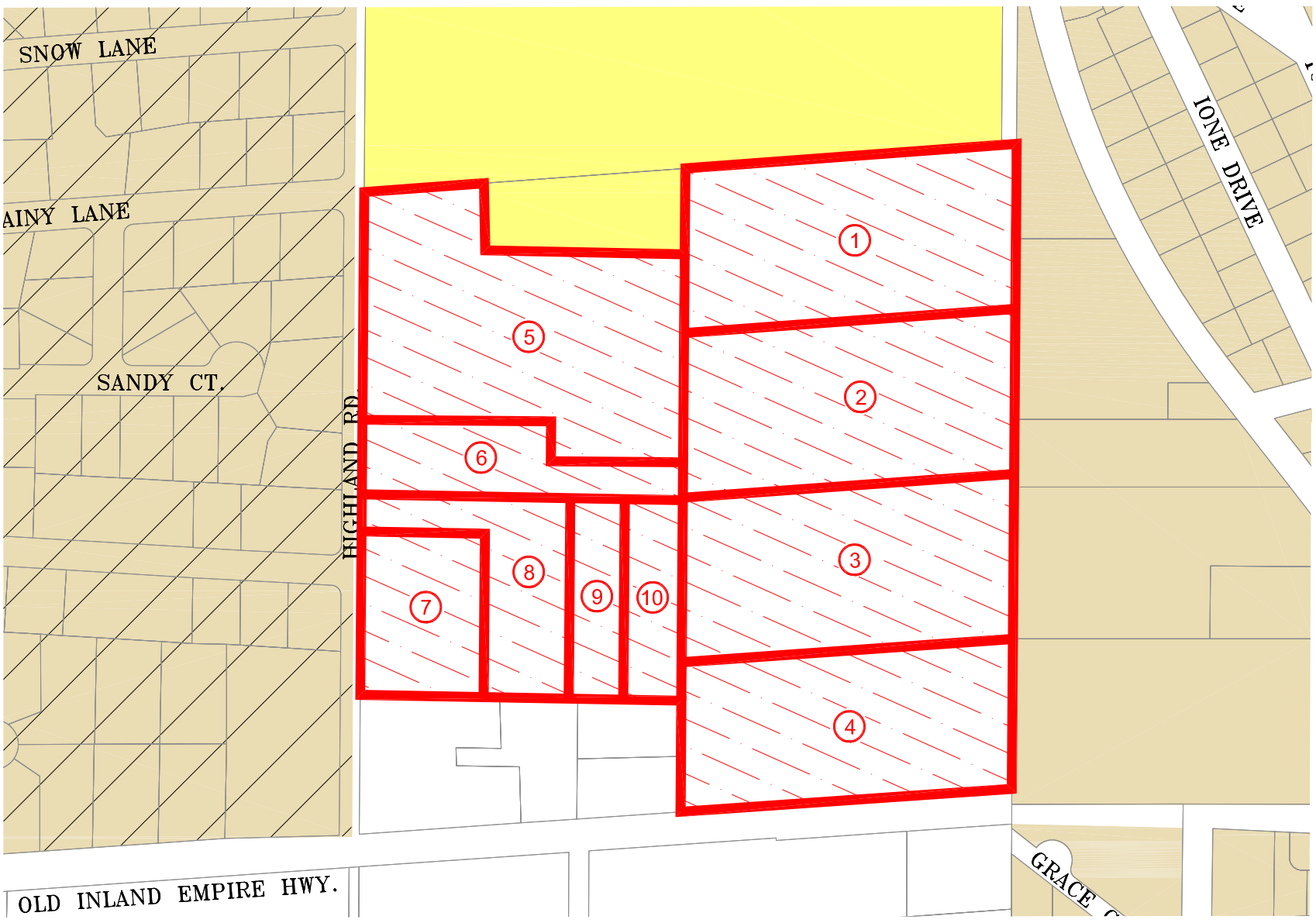
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SCALE IN FEET

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

1. OLSEN FAMILY LLC
   112964000005000
   5.03 ACRES
2. OLSEN FAMILY LLC
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5. DWS ORCHARDS LLC
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   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
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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?**

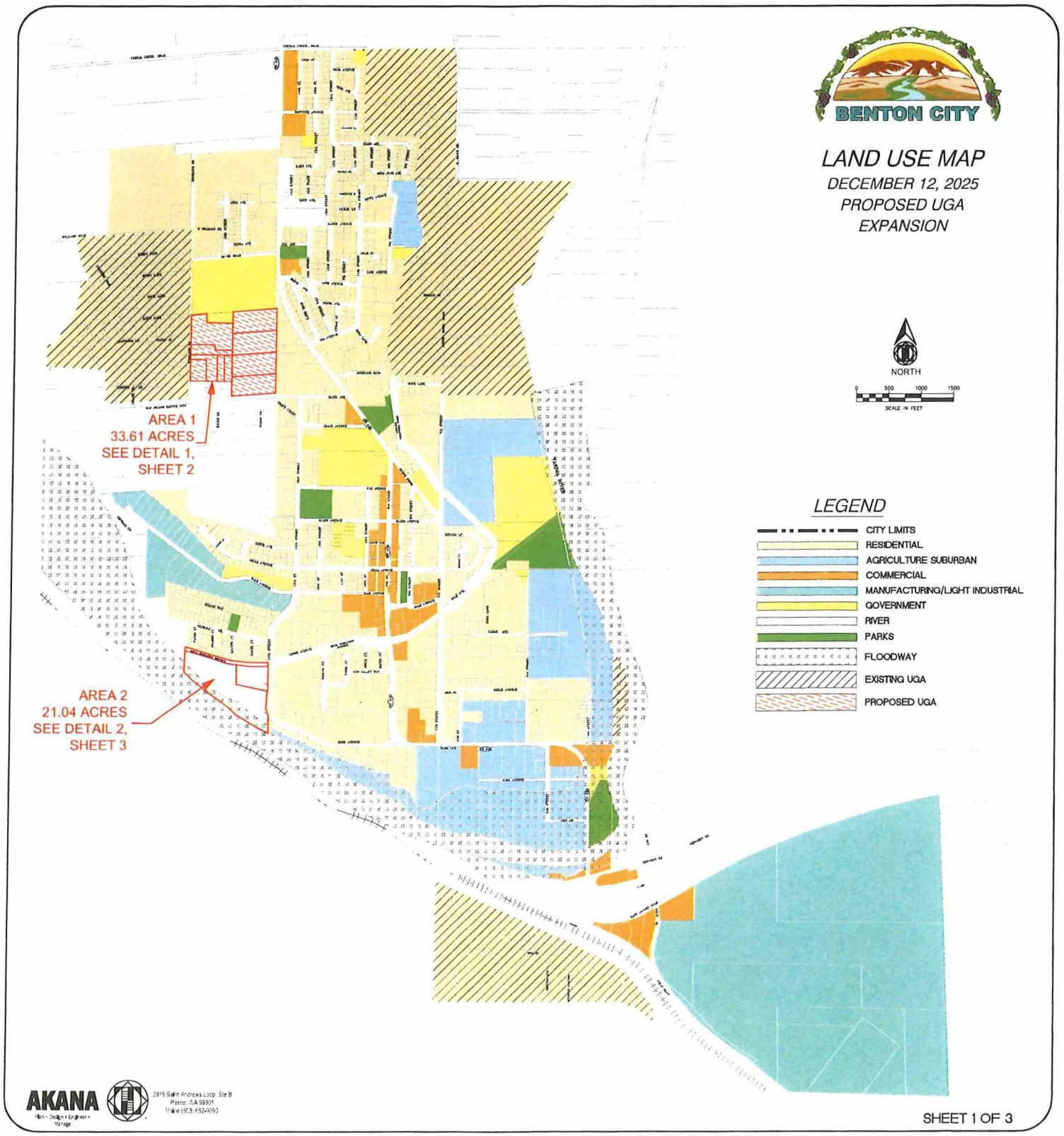
   As a non-project action, the amendments to the Comprehensive Plan will not directly increase demands on transportation or public services and utilities.

   - **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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PROPERTY DESCRIPTIONS

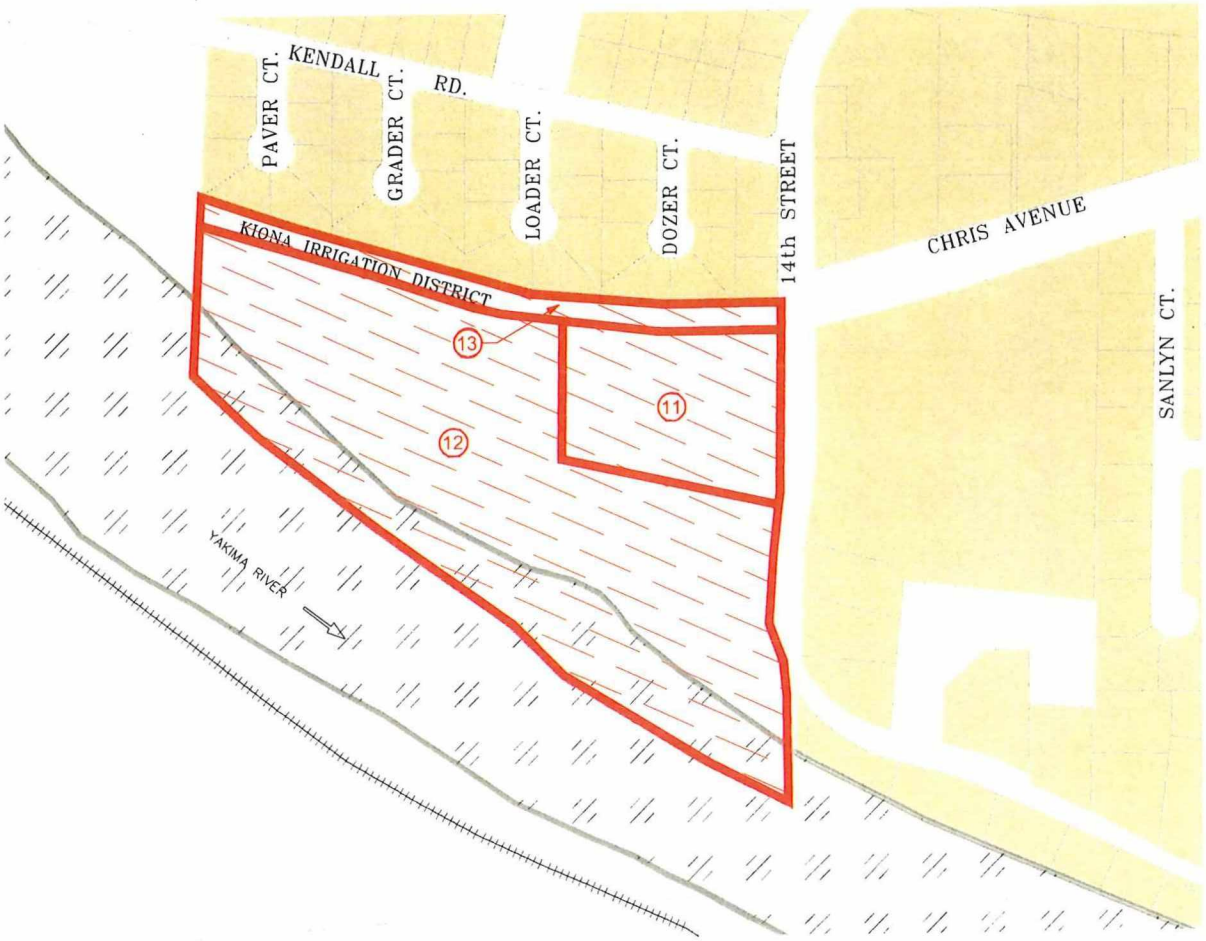
ALL PROPERTIES COUNTY ZONING: RL-5
PROPOSED CITY LAND USE: RESIDENTIAL

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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