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December 2, 2019

The Honorable James Beaver  
The Honorable Jerome Delvin  
The Honorable Shon Small  
The Board of Commissioners for Benton County  
620 Market Street  
Prosser, Washington 99320

Dear Commissioners Beaver, Delvin, and Small:

**Subject:** Comments on File CPA 2019-001 – A request by the City of Kennewick to amend its Urban Growth Area (UGA) to add approximately 279.53 acres to be designated for industrial uses.  
Sent via email to: [commissioners@co.benton.wa.us](mailto:commissioners@co.benton.wa.us); [planning.department@co.benton.wa.us](mailto:planning.department@co.benton.wa.us); [Donna.Hutchinson@co.benton.wa.us](mailto:Donna.Hutchinson@co.benton.wa.us)

Thank you for the opportunity to comment on File CPA 2019-001. Futurewise recommends that the Board of County Commissioners deny the urban growth area (UGA) expansion since it is not needed, will adversely impact the environment, is inconsistent with Benton County’s Countywide Planning Policies, and will mean that the Benton County and Kennewick will not be able to achieve the benefits that come from compact UGAs. This letter first identifies the requirements for designating urban growth areas, the benefits of compact UGAs, and then discusses this specific amendment.

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable, and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members across Washington State including Benton County.

## Growth Management Act Requirements for Urban Growth Areas

Washington’s Growth Management Act (GMA) requires county comprehensive plans to designate UGAs in which urban growth is encouraged and outside of which urban growth is prohibited.<sup>1</sup> Urban growth areas must be designated around all incorporated cities and towns and may include additional land if it is needed to accommodate the projected population, employment, public facilities, and other urban uses.

The size of the urban growth area is determined by the population projection.<sup>2</sup> The Washington State Office of Financial Management prepares a set of population projections for each county every five years or so. They include low, medium, and high projections. The county, in consultation with the cities and towns, selects a twenty-year population projection from this range. The urban growth areas in the county cannot exceed the land needed to accommodate that projection including jobs and other needs, “plus a reasonable land market supply factor.”<sup>3</sup>

<sup>1</sup> RCW 36.70A.110(1), *Thurston County v. Western Washington Growth Management Hearings Bd.*, 164 Wn.2d 329, 348 – 49, 190 P.3d 38, 47 (2008).

<sup>2</sup> *Thurston County v. Western Washington Growth Management Hearings Bd.*, 164 Wn.2d 329, 352, 190 P.3d 38, 49 (2008).

<sup>3</sup> *Id.*





“[A] market [supply] factor represents the estimated percentage of net developable acres contained within a UGA that, due to idiosyncratic market forces, is likely to remain undeveloped over the course of the twenty-year planning cycle.”<sup>4</sup> For example, a person may own five acres of land with a house on it within the urban growth area that is zoned for four homes per acre, but may chose not to develop it over the next twenty years because they want to graze their horses on it or just enjoy the open space around their home.

Other requirements apply to UGA expansions including complying with GMA environment goal which calls on Kennewick and Benton County to “[p]rotect the environment and enhance the state’s high quality of life, including air and water quality, and the availability of water.”<sup>5</sup> Comprehensive plan amendments must comply with the goals and requirements of the GMA.<sup>6</sup>

## The benefits of Urban Growth Areas (UGAs)

The GMA requires urban growth areas and limits their size for many reasons. **One of the most important is that compact urban growth areas (UGAs) save taxpayers and ratepayers money.** In a study published in a peer reviewed journal, John Carruthers and Gudmaundur Ulfarsson analyzed urban areas throughout the United States including Benton County.<sup>7</sup> They found that the per capita costs of most public services declined with density and increased where urban areas were large.<sup>8</sup> **Compact urban growth areas save taxpayers and ratepayers money.** This study was published in a peer reviewed journal.

**Compact urban growth areas also help conserve water long-term.** Large lots and low densities increase water demand, increase leakage from water systems, and increase costs to water system customers.<sup>9</sup> So accommodating the same population and jobs in the existing UGA can reduce future water demands and costs.<sup>10</sup>

**Urban growth areas encourage housing growth in cities and protect rural and resource lands.** To examine the effect of King County, Washington’s urban growth areas on the timing of land development, Cunningham looked at real property data, property sales data, and geographic information systems (GIS) data. These records include 500,000 home sales and 163,000 parcels that had the potential to be developed from 1984 through 2001.<sup>11</sup> Cunningham concluded that “[t]his paper presents compelling evidence that the enactment of a growth boundary reduced development in designated rural areas and increased construction in urban areas, which suggests that the Growth Management Act is achieving its intended

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<sup>4</sup> *Thurston County*, 164 Wn.2d 329, 352, 190 P.3d 38, 49.

<sup>5</sup> RCW 36.70A.020(10).

<sup>6</sup> *King County v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 142 Wn.2d 543, 552, 14 P.3d 133, 138 (2000).

<sup>7</sup> John Carruthers and Gudmaundur Ulfarsson, *Urban Sprawl and the Cost of Public Services* 30 ENVIRONMENT AND PLANNING B: PLANNING AND DESIGN 503, 511 (2003). Enclosed in a separate email along with Futurewise’s letter to the Benton County Planning Commission (Nov. 12, 2019).

<sup>8</sup> *Id.* at 518.

<sup>9</sup> United States Environmental Protection Agency, *Growing Toward More Efficient Water Use: Linking Development, Infrastructure, and Drinking Water Policies* pp. 3 – 5 (EPA 230-R-06-001: January 2006). Accessed on Nov. 8, 2019 at:

<https://www.epa.gov/smartgrowth/growing-toward-more-efficient-water-use> and enclosed in a separate email along with Futurewise’s letter to the Benton County Planning Commission (Nov. 12, 2019).

<sup>10</sup> *Id.* at p. 8.

<sup>11</sup> Christopher R. Cunningham, *Growth Controls, Real Options, and Land Development* 89 THE REVIEW OF ECONOMICS AND STATISTICS 343, 343 (2007). Enclosed in a separate email along with Futurewise’s letter to the Benton County Planning Commission (Nov. 12, 2019).





effect of concentrating housing growth.”<sup>12</sup> He also concluded that by removing uncertainty as to the highest and best use of the land that it accelerated housing development in King County.<sup>13</sup> This study was published in a peer reviewed journal.

Reducing development in rural areas and natural resource lands can also have significant environmental benefits, such as protecting water quality, working farms and forests, and fish and wildlife habitat.

One of the most controversial issues related to urban growth areas is whether the restricted land supply causes increases in housing costs. Carruthers, in another peer reviewed study, examined the evidence for the Portland urban growth area and concluded that it was not increasing housing costs because the city’s high-density zoning allowed the construction of an abundant housing supply.<sup>14</sup>

**Urban growth areas help keep our existing cities and towns vibrant and economically desirable.**

In a peer reviewed study, Dawkins and Nelson found that the city of Yakima’s share of the metropolitan housing market increased after adoption of the GMA.<sup>15</sup> This and other measures showed that center cities in states with growth management laws attract greater shares of the metropolitan area’s housing market than center cities in states without growth management aiding center city revitalization.<sup>16</sup> This reduces the tendency to move out of existing center cities.

**Urban growth areas promote healthy lifestyles.** Aytur, Rodriguez, Evenson, and Catellier conducted a statistical analysis of leisure and transportation-related physical activity in 63 large metropolitan statistical areas, including Seattle, Tacoma, and Spokane from 1990 to 2002.<sup>17</sup> Their peer reviewed study found a positive association between residents’ leisure time physical activity and walking and bicycling to work and “strong” urban containment policies such as those in Washington State.<sup>18</sup>

**Compact urban growth areas, because they allow shorter automobile trips and encourage walking, bicycling, and transit use, reduce per capita greenhouse gas emissions,** such as CO<sub>2</sub>. In Washington State, transportation activities are the largest contributor to greenhouse gas emissions, generating 44.6 percent of our state’s global warming causing gases.<sup>19</sup> The Washington Climate Advisory

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<sup>12</sup> *Id.* at 356.

<sup>13</sup> *Id.* at 356 – 57.

<sup>14</sup> John I. Carruthers, *The Impacts of State Growth Management Programmes: A Comparative Analysis* 39 URBAN STUDIES 1959, 1976 (2002). Carruthers included Washington’s GMA in his analysis but concluded that it was too early to tell if it was successful since it had only been in place for seven years in the data he analyzed, but he believed the GMA had promise if “consistently enforced.” *Id.* at 1977. A copy of this article was enclosed in a separate email along with Futurewise’s letter to the Benton County Planning Commission (Nov. 12, 2019).

<sup>15</sup> Casey J. Dawkins & Arthur C. Nelson, *State Growth Management Programs and Central-City Revitalization*, 69 *Journal of the American Planning Association* 381, 386 (2003).

<sup>16</sup> *Id.* at 392 – 93 (2003).

<sup>17</sup> Semra A. Aytur, Daniel A. Rodriguez, Kelly R. Evenson, & Diane J. Catellier, *Urban Containment Policies and Physical Activity: A Time-Series Analysis of Metropolitan Areas, 1990–2002* 34 *AMERICAN JOURNAL OF PREVENTIVE MEDICINE* 320, 325 (2008). A copy of this article was enclosed in a separate email along with Futurewise’s letter to the Benton County Planning Commission (Nov. 12, 2019).

<sup>18</sup> *Id.* at 330.

<sup>19</sup> State of Washington Department of Ecology, *2017 greenhouse gas data* webpage accessed on Nov. 25, 2019 at: <https://ecology.wa.gov/Air-Climate/Climate-change/Greenhouse-gases/2017-greenhouse-gas-data> and enclosed in a separate email; *Leading the Way: A Comprehensive Approach to Reducing Greenhouse Gases in Washington State Recommendations of the Washington Climate Advisory Team* p. 57 (Feb. 1, 2008), accessed on November 12, 2019 at: <https://fortress.wa.gov/ecy/publications/SummaryPages/0801008b.html>.





Team (CAT) wrote that we must reduce the amount of driving we do if we are going to meet the state's greenhouse gas emissions requirements.<sup>20</sup>

## The urban growth area expansion is not needed to accommodate planned urban growth and will adversely impact the environment.

As we have seen, the Washington State Supreme Court has held that a “UGA designation cannot exceed the amount of land necessary to accommodate the urban growth projected by OFM, plus a reasonable land market supply factor.”<sup>21</sup> Kennewick, Richland, and West Richland share a single urban growth area.<sup>22</sup> Benton County Countywide Planning Policy #4 provides that 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.”<sup>23</sup>

So, in determining whether the UGA is adequately sized, the County must take into account the shared UGA. As part of the 2018 update to the comprehensive plan, Benton County added 901 net acres to the urban growth area shared by Kennewick for industrial uses.<sup>24</sup> This expansion exceeds the 774.5-acre industrial land deficiency identified by the City of Kennewick.<sup>25</sup> The *City of Kennewick Industrial Zoned Land Assessment* recognized that there are adequate industrial lands in the area writing on page 32 that “there is enough developable industrial land to accommodate several decades of growth.”

In addition, the City of Kennewick has a surplus of 1,387.2 acres of Low Density Residential vacant and undeveloped land some of which could be redesignated for industrial uses north of I-82 outside the aquifer recharge area.<sup>26</sup>

In the 2014 decision finding that an urban growth area expansion violated the Growth Management Act, the Board wrote that “none of the exhibits provided by the City or the County substantially explain how

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<sup>20</sup> *Leading the Way: A Comprehensive Approach to Reducing Greenhouse Gases in Washington State Recommendations of the Washington Climate Advisory Team* p. 57 (February 1, 2008).

<sup>21</sup> *Thurston County v. Western Washington Growth Management Hearings Bd.*, 164 Wn.2d 329, 351 – 52, 190 P.3d 38, 48 – 49 (2008) (emphasis added).

<sup>22</sup> Figure 4: 2006 Periodic Update Land Use Designations Map - Benton County Comprehensive Plan Update Appendix A: Map Folio / February 2018 accessed on Oct. 6, 2019 at:

<https://bentoncounty.municipalcms.com/files/documents/2017CompPlanUpdate-Feb2018MainDocApxA129020130020718PM.pdf> and enclosed in a separate email along with Futurewise's letter to the Benton County Planning Commission (Nov. 12, 2019).

<sup>23</sup> Benton County Ordinance No. 581 Exhibit A p. 5 (Feb. 17, 2017) accessed on Oct. 6, 2019 at: <https://bentoncounty.municipalcms.com/files/documents/FinalCPAppendixEFeb2018129044908020718PM.pdf> and enclosed in a separate email along with Futurewise's letter to the Benton County Planning Commission (Nov. 12, 2019). Underlining added.

<sup>24</sup> *Benton County Comprehensive Plan Update* p. 50 (Feb. 2018) accessed on Nov. 8, 2019 at: <https://bentoncounty.municipalcms.com/files/documents/2017CompPlanUpdate-Feb2018MainDocApxA129020130020718PM.pdf> and cited pages enclosed in a separate email along with Futurewise's letter to the Benton County Planning Commission (Nov. 12, 2019).

<sup>25</sup> PCM 1.15 City of Kennewick 2018 UGA Information Spreadsheet (in the Exhibit List for CPA 2019-001 City of Kennewick UGA Application).

<sup>26</sup> *Id.*; PCM 1.12 Amendment Area Aerial Map, PCM 1.13 Critical Areas Map, and PCM 1.14 City of Kennewick Map 1. Future Land Use Map (all in the Exhibit List for CPA 2019-001 City of Kennewick UGA Application).





this need correlates with the City's planned 20-year population growth through 2034, or is supported by any special City, County, or State studies of the need to increase the City's industrial lands to meet the City's planned population growth."<sup>27</sup> So the expansion violated the GMA.<sup>28</sup> Again, the documents included with the application fail to show that this urban growth area is needed to provide for the industrial needs of Kennewick's planned population growth.<sup>29</sup> So the proposed UGA expansion violates the GMA.

The proposed UGA expansion also includes important fish and wildlife habitats.<sup>30</sup> Given that this expansion is not needed, converting these habitats to urban uses violates the GMA environment goal which calls on Benton County to "[p]rotect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water."<sup>31</sup>

The Middle Columbia Fall Bright Chinook salmon have been identified as a priority Chinook salmon species for the recovery of the Southern Resident Orcas.<sup>32</sup> These salmon spawn in the Columbia River in Benton County and lower tributaries.<sup>33</sup> To protect the Chinook salmon and help recover the Southern Resident Orcas, the Southern Resident Orca Task Force recommends incentivizing infill and development in brown fields that would not impact critical habitats and reducing urban sprawl by growing "up instead of out."<sup>34</sup> This UGA expansion is inconsistent with the Southern Resident Orca Task Force recommendations and we urge the Board of County Commissioners to deny this application.

Finally, the proposed UGA is across I-82 from any urban residential neighborhood, is not served by transit,<sup>35</sup> is not served by sidewalks or trails and is a long walk or bicycle ride from residential neighborhoods assuming that is possible since the site is served by a County designated Primitive Road.<sup>36</sup>

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<sup>27</sup> *Futurewise v. Benton County and the City of Kennewick and the Kennewick Industrial District, LLC*, Eastern Washington Region Growth Management Hearings Board Case No. 14-1-0003 Final Decision and Order (Oct. 15, 2014), at 12 of 38 accessed on Nov. 27, 2019 at: <http://www.gmhb.wa.gov/Global/RenderPDF?source=casedocument&id=3658>.

<sup>28</sup> *Id.*

<sup>29</sup> PCM 1.23 ECONorthwest, *City of Kennewick Industrial Zoned Land Assessment* p. 32 (Sept. 30, 2016) (in the Exhibit List for CPA 2019-001 City of Kennewick UGA Application).

<sup>30</sup> PCM 1.13 Critical Areas Map (in the Exhibit List for CPA 2019-001 City of Kennewick UGA Application); State of Washington Department of Fish and Wildlife Letter to Benton County Subject: CPA 13-01, City of Kennewick, Urban Growth Area Proposal pp. \*1 – 2 (Nov. 15, 2013) enclosed in a separate email along with Futurewise's letter to the Benton County Planning Commission (Nov. 12, 2019); PHS on the Web screen shot accessed on Nov. 8, 2019 at: <http://apps.wdfw.wa.gov/phsontheweb/> and enclosed in a separate email along with Futurewise's letter to the Benton County Planning Commission (Nov. 12, 2019).

<sup>31</sup> RCW 36.70A.020(10).

<sup>32</sup> National Oceanic and Atmospheric Administration and the State of Washington Department of Fish and Wildlife, Southern Resident Killer Whale Priority Chinook Stocks p. 6 (June 22, 2018) last accessed on Nov. 8, 2019 at: <https://www.documentcloud.org/documents/4615304-SRKW-Priority-Chinook-Stocks.html> and enclosed in a separate email along with Futurewise's letter to the Benton County Planning Commission (Nov. 12, 2019).

<sup>33</sup> Tech Memo-22: Status Review for Mid-Columbia River Summer Chinook Salmon Summary of Biological Information pp. 5 – 6 of 14 accessed on Nov. 8, 2019 at: <https://www.nwfsc.noaa.gov/publications/scipubs/techmemos/tm22/biology.htm> and enclosed in a separate email along with Futurewise's letter to the Benton County Planning Commission (Nov. 12, 2019).

<sup>34</sup> Southern Resident Orca Task Force, *Final Report and Recommendations* p. 107 (Nov. 2019) accessed on Nov. 8, 2019 at: <https://www.governor.wa.gov/issues/issues/energy-environment/southern-resident-orca-recovery/task-force> and enclosed in a separate email along with Futurewise's letter to the Benton County Planning Commission (Nov. 12, 2019).

<sup>35</sup> PCM 1.26 *City of Kennewick 2040 Transportation System Plan* Figure 2-6 (in Planning Commission Packet for CPA 2019-001 City of Kennewick UGA Application).

<sup>36</sup> PCM 1.26 *City of Kennewick 2040 Transportation System Plan* Figures 2-3 & 2-4; A photograph showing the Christensen Road Private Road sign is enclosed in a separate email.





Everyone working on this site will drive to work, generating significant amounts of greenhouse gas pollution.<sup>37</sup>

In addition, “[e]missions from shipping and transportation are up, due to increases in aviation, marine shipping, and diesel truck traffic.”<sup>38</sup> By designating such a remote location far from rail lines for industrial uses, diesel truck traffic and greenhouse gas pollution will only increase.<sup>39</sup>

Washington is already not on track to meet the 2020 greenhouse gas reduction requirement of 90.0 million metric tons (MMT).<sup>40</sup> The 2017 emissions were 97.5 MMT.<sup>41</sup> Trips to the site by workers and truck traffic to the site will increase global warming and its adverse impacts on Benton County including increased wildfires, increased demands for water, and reduced water availability in the summer and fall due to a reduction in water stored as snow in the spring and summer.<sup>42</sup> Recent scientific reports document that “the required cuts in emissions are now 2.7 per cent per year from 2020 for the 2°C [temperature increase] goal and 7.6 per cent per year on average for the 1.5°C goal.”<sup>43</sup> “Further delaying the reductions needed to meet the goals would imply future emission reductions and removal of CO<sup>2</sup> from the atmosphere at such a magnitude that it would result in a serious deviation from current available pathways. This, together with necessary adaptation actions, risks seriously damaging the global economy and undermining food security and biodiversity.” We cannot afford to take actions that increase global warming pollution, we must decrease it. Actions that increase global warming pollution also violate RCW 36.70A.020(10) which directs Benton County to “[p]rotect the environment and enhance the state’s high quality of life, including air and water quality, and the availability of water.”

In contrast, the land designated Industrial along and north of East Chemical Drive in Kennewick is near the railroad line and close to transit service.<sup>44</sup> Development of the undeveloped Industrial land in this area for industrial or manufacturing uses will generate much less greenhouse gas pollution than the development of the UGA expansion.<sup>45</sup> Again, we urge the Board of County Commissioners to deny this application.

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<sup>37</sup> PCM 1.37 Washington State Department of Transportation letter to City of Kennewick Development Services p. 1 (Sept. 6, 2019) (in Planning Commission Packet for CPA 2019-001 City of Kennewick UGA Application).

<sup>38</sup> State of Washington Department of Ecology, *2017 greenhouse gas data* webpage.

<sup>39</sup> PCM 1.26 *City of Kennewick 2040 Transportation System Plan* Figure 2-7.

<sup>40</sup> State of Washington Department of Ecology, *Washington State Greenhouse Gas Emissions Inventory: 1990-2015: Report to the Legislature* p. vii & p. 1 (Publication 18-02-043: Dec. 2018) accessed on Nov. 25, 2019 at: <https://fortress.wa.gov/ecy/publications/documents/1802043.pdf>; Evan Bush, *Washington’s greenhouse-gas emissions continue to trend higher in latest inventory* *Seattle Times* (Nov. 19, 2019) accessed on Nov. 27, 2019 at: <https://www.seattletimes.com/seattle-news/environment/washingtons-greenhouse-gas-emissions-continue-to-trend-higher-in-latest-inventory/> and both documents enclosed in separate emails.

<sup>41</sup> State of Washington Department of Ecology, *2017 greenhouse gas data* webpage.

<sup>42</sup> State of Washington Department of Ecology, *Climate change and the environment* webpage accessed on Nov. 25, 2019 at: <https://ecology.wa.gov/Air-Climate/Climate-change/Climate-change-the-environment> and enclosed in a separate email.

<sup>43</sup> United Nations Environment Programme, *Emissions Gap Report 2019* p. xx (UNEP, Nairobi: 2019) accessed on Nov. 27, 2019 at <http://www.unenvironment.org/emissionsgap> and enclosed in a separate email.

<sup>44</sup> PCM 1.26 *City of Kennewick 2040 Transportation System Plan* Figure 2-6; PCM 1.1.4 (in Planning Commission Packet for CPA 2019-001 City of Kennewick UGA Application); Google Maps 2019 Aerial Image enclosed in an additional email.

<sup>45</sup> Google Maps 2019 Aerial Image; Jocelyn Timperley, *Eight charts show how ‘aggressive’ railway expansion could cut emissions* (Carbon Brief: 30 Jan. 2019) accessed on Dec. 2, 2019 at: <https://www.carbonbrief.org/eight-charts-show-how-aggressive-railway-expansion-could-cut-emissions> and enclosed in an additional email.





## The urban growth area expansion violates the Benton County Countywide Planning Policies.

County comprehensive plans must comply with countywide planning policies.<sup>46</sup> Countywide Planning Policy #9 provides in full that “[t]he appropriate directions for the expansion of urban growth areas are those which are unincorporated lands with existing service infrastructure and lands adjacent to corporate limits.”<sup>47</sup> The proposed urban growth area expansion does not have existing service infrastructure. The UGA expansion does not include an access to I-82, the access and interchange is in the rural area to the southeast.<sup>48</sup> There is no evidence the electrical connection is anything but the type of service common to agricultural areas. There is no water service, no sewer service, no other urban services.<sup>49</sup> The Kennewick corporate limits are north of I-82, divided four lane highway, and so are not adjacent to the proposed UGA expansion they are distant from the UGA expansion.<sup>50</sup>

Countywide Planning Policy #16 provides in part that “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.”<sup>51</sup> The proposed expansion is not characterized by urban growth or adjacent to territory already characterized by urban growth. The land is farmland and wildlife habitat and is adjacent to other farmland and a highway in an agricultural and rural area.<sup>52</sup> The land does not meet the definitions of urban in Countywide Planning Policy #16 either. So, the proposed urban growth area expansion violates the Countywide Planning Policies. So again, the Board of County Commissioner should deny the proposed comprehensive plan amendment.

Futurewise would be happy to discuss the City of Kennewick’s need for manufacturing and industrial land and local and regional opportunities to meet those needs.

Thank you for considering our comments. If you require additional information, please contact Alison Cable at telephone 206 343 0681 Ext. 114 and email: [alison@futurewise.org](mailto:alison@futurewise.org) or Tim Trohimovich at telephone (206) 343-0681 Ext. 118 and email: [tim@futurewise.org](mailto:tim@futurewise.org).

Very Truly Yours,

Alison Cable

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<sup>46</sup> *King Cty. King Cty. v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 138 Wn.2d 161, 175 – 76, 979 P.2d 374, 380 (1999); RCW 36.70A.210(1).

<sup>47</sup> Benton County Ordinance No. 581 Exhibit A p. 6 (Feb. 17, 2017).

<sup>48</sup> PCM 1.2 CPA 2019-001 Comp Plan Amendment Request by the City of Kennewick Benton County Current Comp Plan Designations Map (Oct. 3, 2019) and PCM 1.12 Amendment Area Aerial Map (both in the Exhibit List for CPA 2019-001 City of Kennewick UGA Application).

<sup>49</sup> PCM 1.25 City of Kennewick Sewer Plan; PCM 1.27 City of Kennewick Water Plan; PCM 1.31 City of Kennewick August 2019 Capacity Facilities Analysis.

<sup>50</sup> PCM 1.2 CPA 2019-001 Comp Plan Amendment Request by the City of Kennewick Benton County Current Comp Plan Designations Map (Oct. 3, 2019) and PCM 1.12 Amendment Area Aerial Map (both in the Exhibit List for CPA 2019-001 City of Kennewick UGA Application).

<sup>51</sup> Benton County Ordinance No. 581 Exhibit A p. 7 (Feb. 17, 2017).

<sup>52</sup> PCM 1.12 Amendment Area Aerial Map (in the Exhibit List for CPA 2019-001 City of Kennewick UGA Application).





**Tri-Cities Program Manager**

Tim Trohimovich, AICP  
**Director of Planning & Law**

Enclosures

