

4.9 LAND USE

4.9.1 ALTERNATIVE A – PREFERRED CASINO-RESORT PROJECT

LAND USE

Land Use Jurisdiction

The National Environmental Policy Act (NEPA) requires an assessment of a project's effect on adopted land use plans as well as plans that have been formally proposed and are being actively pursued by officials of the jurisdiction. Accordingly, the Proposed Project's consistency with adopted and proposed land use regulations is assessed below.

At this time, the project site is currently under County jurisdiction; once the Federal government acquires the property in trust for the Tribe, the parcels will not be subject to County land use regulations. Similarly, any future City regulations, should the La Center Interchange Site be incorporated within the City of La Center, would not apply. Only tribal land use regulations are applicable on trust lands. The Tribal Government relies upon the Tribal Council, the governing body of the Tribal Government, to guide and regulate land use on Tribal lands.

The Tribal Government desires to work cooperatively with local and State authorities on matters related to land use. Therefore, in accordance with Section 10.0 of the Memorandum of Understanding (MOU) (DEIS Vol. I, **Appendix C**) and Section 3(G) of the Tribe's Environment, Public Health and Safety (EPHS) Ordinance (FEIS **Appendix U**), the Tribe has agreed to develop the trust lands, and any structures and uses on the property, in a manner consistent with certain specified Clark County codes and ordinances. Relevant sections of the Clark County Code include, but are not limited to, Title 13, Public Works; Title 14, Buildings and Structures; Title 15, Fire Prevention; and Title 40, the Clark County Uniform Development Code (UDC).

Consistency with Clark County Comprehensive Growth Management Plan

Table 4.9-1 discusses the land use consistency of the La Center Interchange Site Alternatives (Alternatives A-D) with respect to the relevant goals and policies outlined in the Clark County Comprehensive Growth Management Plan (GMP) Land Use Element.

Consistency with Clark County Land Use Designations

Development of Alternative A would replace rural residential and agricultural uses with a casino-resort complex, associated parking areas, recreational vehicle (RV) park, Tribal offices, Tribal elder housing, and a Tribal cultural center. The La Center Interchange Site is currently designated Light Industrial with an Urban Holding – 40 overlay by the Clark County Comprehensive GMP. The Light Industrial designation is intended to provide for light manufacturing, warehousing, transportation and

TABLE 4.9-1
PROPOSED PROJECT AND ALTERNATIVES
CLARK COUNTY COMPREHENSIVE GMP LAND USE CONSISTENCY

| Clark County Comprehensive Growth Management Plan | | Land Use Consistency (Yes or No) | | | | | Discussion |
|--|---|-------------------------------------|-------|-------|-------|-------|---|
| Land Use Element Goals: Countywide Planning Policies | | Alt A | Alt B | Alt C | Alt D | Alt E | |
| Section | Summary | | | | | | |
| 1.1.3 | <p>Urban growth shall be located primarily in areas already characterized by urban growth that have existing public facility and service capacities to adequately serve such development, and secondly in areas already characterized by urban growth that will be served by a combination of both existing public facilities and services that are provided by either public or private sources. Urban governmental services shall be provided in urban areas. These services may also be provided in rural areas, but only at levels appropriate to serve rural development.</p> <p>Urban governmental services include those services historically and typically delivered by cities or special districts, and include storm and sanitary sewer systems, domestic water systems, street cleaning services, fire and police protection, public transit services, and other public utilities not normally associated with non-urban areas.</p> | Yes | Yes | Yes | Yes | N/A | Development of Alternatives A-D will be located in an area already designated as a future urban area. Furthermore, public services will be supplied to the La Center Interchange Site through development of on-site resources (i.e. wastewater treatment plant), or through connection with adjacent municipal infrastructure. |
| 1.1.5 | Urban growth is defined as growth that makes intensive use of land for the location of buildings, structures, and impermeable surfaces to such a degree as to be incompatible with the primary use of such land for the production of food, other agricultural products, fiber, or the extraction of mineral resources. | Yes | Yes | Yes | Yes | N/A | Development of the Proposed Project and Alternatives will occur on land designated for future urban development (i.e. Industrial Urban Reserve and Urban Holding-40). The transformation from agricultural land to urbanized land has been planned for by the Clark County Comprehensive GMP. |

| Clark County Comprehensive Growth Management Plan | | Land Use Consistency (Yes or No) | | | | | Discussion |
|--|--|-------------------------------------|-------|-------|-------|-------|---|
| Land Use Element Goals: Countywide Planning Policies | | Alt A | Alt B | Alt C | Alt D | Alt E | |
| Section | Summary | | | | | | |
| 1.1.13 | Urban Growth Areas of Battle Ground, Camas, Ridgefield and Washougal will have a full range of residential, commercial, and industrial uses, as well as schools and neighborhood, community, and regional parks, and will be within walking distance of High Capacity Transit (HCT) corridors or public transit. Higher densities occur along transit corridors. These urban growth centers should have a center focus that combines commercial, civic, cultural, and recreational uses. La Center Urban Growth Area is located in predominantly a residential area with at least 4 housing units per net residential acre (3 gross units per acre), and includes pedestrian-oriented commercial uses, schools, and small parks. | Yes | Yes | Yes | Yes | N/A | Development of Alternatives A-D would occur within the City of La Center's UGA and adjacent to a major freeway. The casino would be a high-density development along a major transportation corridor that would be consistent with this policy. |
| 1.3.1 | Urban densities and uses may occur throughout the urban growth area if it is provided with adequate services. Development and redevelopment in the UGA should be strongly encouraged to occur in greater intensity in major centers, transit routes and other areas characterized by both existing higher density urban development and existing urban services. Development and redevelopment should be encouraged to occur with less intensity in areas where urban development is of lower density or has not yet occurred, or in areas where urban services do not yet exist. | Yes | Yes | Yes | Yes | N/A | On-site facilities (i.e. wastewater treatment plants), or expansion of existing public infrastructure, will serve the development of Alternatives A-D. A major freeway will provide direct access to the alternative project sites. |
| 1.4.4 and 1.4.5 | Compact commercial nodal development shall be encouraged. Strip-type commercial developments shall be discouraged. Commercial developments should utilize shared facilities and infrastructure, including but not limited to common wall structures, shared parking lots, access points, sidewalks, signs, or innovative design features. | Yes | Yes | Yes | Yes | N/A | Development of Alternatives A-D would allow for a future shared circulation system with adjacent development when it occurs. Alternatives A-D will consist of an architecturally pleasing design that will allow for continuity with future developments. |

| Clark County Comprehensive Growth Management Plan | | Land Use Consistency (Yes or No) | | | | | Discussion |
|--|--|-------------------------------------|-------|-------|-------|-------|--|
| Land Use Element Goals: Countywide Planning Policies | | Alt A | Alt B | Alt C | Alt D | Alt E | |
| Section | Summary | | | | | | |
| 1.4.6 | Commercial development should be designed and located as follows: Features to both allow for and encourage pedestrian access to and between commercial developments and roadways shall be provided. Storefront design with zero or minimal front setbacks should be used. Frontal parking should be minimized. Side or rear lot parking should be encouraged. | Yes | Yes | Yes | Yes | N/A | Development of Alternatives A-D would allow for a future shared circulation system with adjacent development when it occurs. Development of a parking structure would reduce the need for frontal parking. This will also result in pedestrian-friendly site access, as pedestrians would not be required to walk long distances over surface parking areas. Because there are currently no adjacent parcels developed with similar uses, all of the development alternatives will consist of an architecturally pleasing design that would allow for continuity with future similar developments. |
| 1.4.7 | Higher intensity uses should be located on or near streets served by transit. | No | No | No | No | N/A | There is no regularly scheduled transit service to the La Center Interchange Site provided by C-TRAN, the local bus service provider for Clark County. |

Source: Clark County, 2007.

other land intensive uses. The commercial nature of Alternative A is not consistent with existing Clark County land use designation for the project site. Although commercial land uses proposed by the project and those allowed under the Light Industrial designation are both urban in nature and would be generally compatible, potential impacts could result from this inconsistency associated with increased vehicle trip generation and public use of the area. Mitigation measures identified in **Section 5.0** relating to traffic, noise, air quality, public services, and aesthetics would reduce environmental impacts associated with the project's inconsistency with adopted Clark County land use designations to less than significant.

Consistency with County Unified Development Code

The La Center Interchange Site is zoned Light Industrial with an Urban Holding (UH) 40 overlay. The Light Industrial designation is intended to provide for light manufacturing, warehousing, transportation and other land intensive uses while the UH overlay zone is applied to protect lands identified within urban growth areas from premature development until urban services are available or the lands are annexed by the city. Specifically, the UH-40 overlay is intended to retain larger lots to ensure the site is adequate in size to accommodate major industrial or office campus developments. Alternative A is commercial in nature and would not conform to allowable land uses under the Light Industrial zone. Additionally, construction of the project would be inconsistent with the Urban Holding designation intended to prevent premature development on the project site and could result in significant impacts associated with congestion on rural roads not sized to handle increased traffic (**Section 4.8**); inadequate public infrastructure (**Section 4.10**); and alterations of the visual resources and aesthetics of the surrounding rural residential neighborhood (**Section 4.13**). These impacts would be reduced through mitigation measures identified in **Section 5.0** relating to each respective environmental issue area.

As mentioned above and in **Section 2.0**, the Tribal Government desires to work cooperatively with local and State authorities on matters related to land use to further reduce the significant effects associated with the land use and zoning inconsistencies of the Proposed Project. The Tribe has agreed to develop the trust lands and any structures and uses on the property in a manner consistent with certain specified Clark County codes and ordinances pursuant to Section 10.0 of the MOU (DEIS Vol. I, **Appendix C**) and Section 3(G) of the EPHS Ordinance (FEIS **Appendix U**). Relevant sections of the Clark County Code include, but are not limited to, Title 13, Public Works; Title 14, Buildings and Structures; Title 15, Fire Prevention; and Title 40, the Clark County UDC. Specifically, Title 14 incorporates by reference the Uniform Building, Plumbing, and Mechanical codes. Compliance with specified Clark County codes and ordinances pursuant to Section 10.0 of the MOU (DEIS Vol. I, **Appendix C**) and Section 3(G) of the EPHS Ordinance (FEIS **Appendix U**) would ensure impacts associated with zoning inconsistencies are less than significant.

Consistency with City of La Center Expanded UGA

As described in **Section 3.9**, the County approved an update of the Comprehensive GMP in September 2007 to prepare for anticipated population increases in the County through the year 2024. The update resulted in the expansion of the City of La Center's UGA boundary from 326 acres to 1,427 acres including the entirety of the La Center Interchange Site. The expanded area is intended to accommodate future employment opportunities and projected population growth within the City of La Center. Implementation of Alternative A would remove approximately 151.87 acres from La Center's UGA intended for Industrial development, possibly restricting the ability of City of La Center to accommodate future growth and employment opportunities through the year 2024. However, land uses proposed by the project and those allowed under the Light Industrial designation are both urban in nature and would result in similar environmental effects. Additionally, implementation of Alternative A would be consistent with the intended purpose of the UGA to accommodate employment opportunities. Significant environmental effects resulting from inconsistency with the Light Industrial designation would generally be limited to those associated with increased vehicle trip generation. Impacts associated with insufficient roadway infrastructure (**Section 4.8**), vehicle emissions (**Section 4.4**), and traffic related noise (**Section 4.11**) would be reduced to less than significant with implementation of mitigation measures identified in **Section 5.0** relating to each respective issue area. Furthermore, when the County approved La Center's UGA expansion, they adopted Land Use Policy 1.1.19 which specifically requires that an additional 120 acres of industrial land located south of the La Center Interchange Site adjacent to Interstate 5 would be added to the La Center Urban Area as an out-of-cycle subarea amendment if the project site is brought into federal trust for the Cowlitz Indian Tribe. This policy ensures that an alternative location would be provided to accommodate future growth and employment opportunities with the City of La Center. Therefore, impacts to the City of La Center's UGA are considered less than significant.

Land Use Compatibility

Proposed land uses for the La Center Interchange Site include the main casino and hotel building, parking facilities, an RV park, Tribal elder housing, and a Tribal cultural center. These new uses would replace existing agricultural uses and rural residential housing. In the short term, the rapid urbanization of the La Center Interchange Site would be incompatible with the existing adjacent residential uses to the west and north. Rapid urbanization of the rural site has the potential to result in significant impacts to adjacent sensitive receptors as discussed in detail in the other topical sections of this Environmental Impact Statement (EIS). Impacts may include, but are not limited to, air quality and noise effects from construction and operational activities (**Sections 4.4** and **4.11** respectively); congestion on rural roads not sized to handle increased traffic (**Section 4.8**); and significant alterations of the visual resources and aesthetics of the surrounding neighborhood (**Section 4.13**). Implementation of mitigation measures identified in **Section 5.0** would reduce significant impacts to less than significant levels. In the long term, the site and adjacent areas to the south and east have been planned for industrial-urban development. As the area has been planned for increased

urbanization with light industrial development, and with the incorporation of mitigation measures identified in **Section 5.0**, long-term incompatibility effects with adjacent land uses are not expected.

AGRICULTURE

Development of the La Center Interchange Site would convert farmland that has been identified by the Clark County Comprehensive GMP as land suitable for agricultural development. The site has recently been used for cattle grazing. The Agricultural zoning of the site is intended to preserve lands that have the growing capacity, productivity, soil composition, and surrounding land use to have long-term commercial significance for agriculture and associated resource production. According to the Natural Resource Conservation Service (NRCS), approximately 140 acres of the site consists of soils that are considered prime and or unique agricultural land. However, this represents only approximately 0.1% of the prime farmland in the County (**Appendix Q**). Form AD-1006, the Farmland Conversion Impact Rating Form, was also used to determine whether the site is farmland subject to the Federal Farmland Policy Protection Act. Sites receiving a total score of less than 160 need not be given further consideration. **Table 3.9-3** shows the scores of the La Center Interchange Site as compared to the total possible score of 260 based upon these criteria. The La Center Interchange Site received a total score of 137 (**Appendix Q**). According to USDA recommended thresholds, the site should not be considered for farmland protection. Conversion of this agricultural land would not result in a significant impact.

Additionally, the Clark County Comprehensive GMP also designates the site as Light Industrial with an Urban Holding overlay, which is intended for future industrial-urban development. Because the GMP has already planned for the transformation of the project site into non-agricultural uses, the development of the La Center Interchange Site would result in a less than significant impact to agricultural resources.

4.9.2 ALTERNATIVE B – PREFERRED PROJECT WITHOUT REROUTING NW 319TH STREET

Alternative B is similar to Alternative A with the exception that NW 319th Street would not be rerouted. Accordingly, under this Alternative land use impacts would be similar to those described for Alternative A. Refer to the discussion in **Section 4.9.1**.

4.9.3 ALTERNATIVE C – REDUCED INTENSITY

LAND USE

Land Use Jurisdiction

As with Alternative A, once the Federal government acquires the property in trust for the Tribe, the property would not be subject to City and County land use regulations. Only tribal land use

regulations are applicable on trust lands. The Tribal Government relies upon the Tribal Council, the governing body of the Tribal Government, to guide and regulate land use on Tribal lands. However, the Tribal Government desires to work cooperatively with local and State authorities on matters related to land use. NEPA requires an assessment of the project's effect on adopted land use plans. Accordingly, County land use regulations and project effects are assessed below.

Consistency with Clark County Comprehensive Growth Management Plan

Table 4.9-1 above discusses the land use consistency of the Proposed Project and Alternatives with respect to the relevant goals and policies outlined within the Clark County Comprehensive GMP Land Use Element.

Consistency with Land Use Designations

Development of Alternative C would be similar in nature to that of Alternative A, but on a reduced scale. Alternative C would replace rural residential and agricultural uses with a reduced intensity casino-resort complex, associated parking areas, RV park, and Tribal facilities. As described above, development of Alternative C on the La Center Interchange Site would be inconsistent with the current Agricultural designation of the site. Significant impacts associated with this inconsistency may include, but are not limited to, air quality and noise effects from construction and operational activities (**Sections 4.4** and **4.11** respectively); congestion on rural roads not sized to handle increased traffic (**Section 4.8**); and alterations of the visual resources and aesthetics of the surrounding rural residential neighborhood (**Section 4.13**). However, the Clark County Comprehensive GMP anticipates that this area will be developed with urban industrial land uses pursuant to the Industrial Urban Reserve designation. The commercial nature of Alternative C would also be inconsistent with this designation. Although land uses proposed by the project and those allowed under the Industrial Urban Reserve designation are both urban in nature and would be generally compatible, potential impacts could result from this inconsistency associated with increased vehicle trip generation and public use of the area. Mitigation measures identified in **Section 5.0** relating to traffic, noise, air quality, public services, and aesthetics would reduce environmental impacts associated with the project's inconsistency with adopted Clark County land use designations to less than significant.

Consistency with County Unified Development Code

As described under Alternative A, the La Center Interchange Site is zoned AG-20 with a UR-20 overlay zone. Development of Alternative C is commercial in nature and would be inconsistent with the intent and purpose of both the AG-20 zone and the UR-20 overlay zone. This inconsistency could result in environmental impacts associated with inadequate public infrastructure (**Section 4.10**), increased traffic (**Section 4.8**), noise (**Section 4.11**), air quality (**Section 4.4**), and aesthetics (**Section 4.13**). These impacts would be reduced through mitigation measures identified in **Section 5.0** relating to each respective environmental issue area. Additionally, as mentioned above and in **Section 2.0**, the

Tribal Government desires to work cooperatively with local and State authorities on matters related to land use to further reduce the significant effects associated with land use and zoning inconsistencies of the Proposed Project. The Tribe has agreed to develop the trust lands and any structures and uses on the property in a manner consistent with certain specific Clark County codes and ordinances as outlined in Section 10.0 of the MOU with Clark County and Section 3(G) of the EPHS Ordinance (FEIS **Appendix U**).

Consistency with Proposed City of La Center UGA Expansion

As described under Alternative A, the County is currently considering a proposed expansion of the City of La Center's UGA boundary. Alternative C is commercial in nature and would not conform to allowable land uses under the City's proposed land use designation of Industrial for La Center Interchange Site. This would conflict with the plan proposed by the City of La Center to accommodate anticipated growth within the City through the year 2024. However, land uses proposed under Alternative C and those allowed under the proposed Industrial designation are both urban in nature and would result in similar environmental effects. Impacts associated with increased traffic that would result from proposed commercial uses under Alternative C include those associated with insufficient roadway infrastructure (**Section 4.8**), vehicle emissions (**Section 4.4**), and traffic related noise (**Section 4.11**). These impacts would be reduced with implementation of mitigation measures identified in **Section 5.0** relating to each respective issue area. Furthermore, the expansion of La Center's UGA has not been approved or formally adopted by Clark County and various alternative locations are available to the City that could accommodate UGA expansion needs. Therefore, impacts to the City of La Center's proposed plan for UGA expansion are considered less than significant.

Land Use Compatibility

Proposed land uses for the site include the main casino and hotel building, parking facilities, an RV park, and Tribal facilities. As described above under Alternative A, these land uses would generally be inconsistent with the Clark County Comprehensive GMP and the development goals and policies envisioned for this portion of the County. In the short term, rapid urbanization of the rural site has the potential to result in significant impacts to adjacent sensitive receptors as outlined under Alternative A. Implementation of mitigation measures identified in **Section 5.0** for specific environmental issue areas would reduce significant impacts to less than significant levels. Long-term incompatibility effects are not expected as the area has been planned for increased urbanization with light industrial development. With future planned urbanization and the incorporation of mitigation measures identified in **Section 5.0**, long-term incompatibility impacts with adjacent uses is not expected. This impact will be less than significant.

AGRICULTURE

Development of the La Center Interchange Site would convert 140 acres of prime farmland into non-agricultural related uses. However, this represents only approximately 0.1% of the prime farmland in the County (**Appendix Q**). As described in **Section 3.9.5**, Form AD-1006, the Farmland Conversion Impact Rating Form, was used to determine whether the site is farmland subject to the Federal Farmland Policy Protection Act. Sites receiving a total score of less than 160 need not be given further consideration. **Table 3.9-3** shows the scores of the La Center Interchange Site as compared to the total possible score of 160 based upon these criteria. The La Center Interchange Site received a total score of 137 (**Appendix Q**). According to USDA recommended thresholds, the site should not be considered for farmland protection. Additionally, the Clark County Comprehensive GMP has already planned for the transformation of this productive agricultural land into non-agricultural industrial uses. Conversion of this agricultural land would not be a significant impact.

4.9.4 ALTERNATIVE D – BUSINESS PARK**LAND USE****Land Use Jurisdiction**

As with Alternative A, once the Federal government acquires the property in trust for the Tribe, the project parcels would not be subject to City and County land use regulations. Only tribal land use regulations are applicable on trust lands. The Tribal Government relies upon the Tribal Council, the governing body of the Tribal Government, to guide and regulate land use on Tribal lands. However, the Tribal Government desires to work cooperatively with local and State authorities on matters related to land use. Additionally, NEPA requires an assessment of the project's effect on adopted land use plans. Accordingly, County land use regulations and project effects are assessed below.

Consistency with Clark County Comprehensive Growth Management Plan

Table 4.9-1 above discusses the land use consistency of the Proposed Project and Alternatives with respect to the relevant goals and policies outlined within the Clark County Comprehensive GMP Land Use Element.

Consistency with Land Use Designations

Development of Alternative D would replace rural residential and agricultural related uses with a business park consisting of office space, industrial flex space, and accessory commercial uses. Development of Alternative D on the La Center Interchange Site would be inconsistent with the current agricultural designation. However, the site is designated in the Clark County Comprehensive GMP as Industrial Urban Reserve, a designation intended to preserve large parcels of land for future industrial urban development. . Industrial land uses proposed under Alternative D would be consistent with the County's plans for future development in the area. However, the commercial and office development proposed under Alternative D would not be allowable under this designation.

Although land uses proposed under Alternative D and those allowed under the Industrial Urban Reserve designation are both urban in nature and would be generally compatible, potential impacts could result from this inconsistency associated with increased vehicle trip generation and public use of the area. Mitigation measures identified in **Section 5.0** relating to traffic, noise, air quality, public services, and aesthetics would reduce environmental impacts associated with the project's inconsistency with adopted Clark County land use designations to less than significant.

Consistency with County Unified Development Code

The La Center Interchange Site is zoned AG-20 with a UR-20 overlay. Development of Alternative D would not be consistent with the intent and purpose of the both the AG-20 zone and UR-20 overlay zone. Rapid urbanization of the project site could result in environmental impacts associated with inadequate public services (**Section 4.10**), increased traffic (**Section 4.8**), noise (**Section 4.11**), air quality (**Section 4.4**), and aesthetics (**Section 4.13**). These impacts would be reduced through mitigation measures identified in **Section 5.0** relating to each respective environmental issue area. Additionally, as mentioned above and in **Section 2.0**, the Tribal Government desires to work cooperatively with local and State authorities on matters related to land use and to develop the trust lands and any structures and uses on the property in a manner consistent with relevant Clark County codes and ordinances as outlined in Section 10.0 of the MOU with Clark County and Section 3(G) of the EPHS Ordinance (FEIS **Appendix U**).

Consistency with Proposed City of La Center UGA Expansion

The County is currently considering a proposed expansion of the City of La Center's UGA boundary that would include the entirety of the La Center Interchange Site. Adoption of the proposed UGA expansion would convert the existing land use designation of the La Center Interchange Site from Agriculture with an Urban Industrial Overlay to Industrial. Industrial uses proposed under Alternative D would be considered consistent with the intent and purpose of this proposed designation, however, proposed commercial and office land uses would not conform to allowable land uses. Increased vehicle trips resulting from office and commercial development could result in significant impacts associated with inadequate roadway infrastructure (**Section 4.8**), vehicle emissions (**Section 4.4**), and traffic related noise (**Section 4.11**). These impacts would be reduced through implementation of mitigation measures identified for each respective issue area in **Section 5.0**. Additionally, it should be noted that the expansion of La Center's UGA has not been approved or formally adopted by Clark County. Furthermore, various alternative locations are available to the City that could accommodate UGA expansion needs. This impact is considered less than significant.

Land Use Compatibility

Proposed land uses for the La Center Interchange Site under Alternative D include office space, industrial flex space, and accessory commercial uses. These new uses would replace existing

agricultural uses and rural residential housing. In the short term, rapid urbanization would be incompatible with the existing adjacent residential uses to the west and north. Rapid urbanization of the rural site has the potential to result in significant impacts to adjacent sensitive receptors as outlined under Alternative A. Implementation of mitigation measures identified in **Section 5.0** would reduce significant impacts to less than significant levels. Long-term incompatibility effects are not expected as the area has been planned for increased urbanization with light industrial development. With future planned urbanization and the incorporation of mitigation measures identified in **Section 5.0**, incompatibility with adjacent uses is not expected. This would be a less than significant impact.

AGRICULTURE

Development of the La Center Interchange Site would convert 140 acres of prime farmland into non-agricultural related uses. However, this represents only approximately 0.1% of the prime farmland in the County (Clark County, 2004a). As described in **Section 3.9.5**, Form AD-1006, the Farmland Conversion Impact Rating Form, was used to determine whether the site is farmland subject to the Federal Farmland Policy Protection Act. Sites receiving a total score of less than 160 need not be given further consideration. **Table 3.9-3** shows the scores of the La Center Interchange Site as compared to the total possible score of 160 based upon these criteria. The La Center Interchange Site received a total score of 137 (**Appendix Q**). According to USDA recommended thresholds, the site should not be considered for farmland protection. Additionally, the Clark County Comprehensive GMP has already planned for the transformation of this productive agricultural land into non-agricultural, industrial uses. Development of Alternative D would result in a less than significant impact to agricultural resources.

4.9.5 ALTERNATIVE E – RIDGEFIELD INTERCHANGE SITE

LAND USE

Land Use Jurisdiction

At this time the land is currently under the jurisdiction of the City of Ridgefield; however, once the Federal government acquires the property in trust for the Tribe, the parcels will not be subject to City land use regulations. Only tribal land use regulations are applicable on trust lands. The Tribal Government relies upon the Tribal Council, the governing body of the Tribal Government, to guide and regulate land use on Tribal lands. However, the Tribal Government desires to work cooperatively with local and State authorities on matters related to land use. Additionally, NEPA requires an assessment of the project's effect on adopted land use plans. Accordingly, City land use regulations and project effects are assessed below.

Consistency with City of Ridgefield Urban Area Comprehensive Plan 2004-2024

Table 4.9-2 below discusses the land use consistency of Alternative E with respect to the relevant goals and policies outlined within the City of Ridgefield Urban Area Comprehensive Plan 2004-2024 (RUACP).

TABLE 4.9-2
CONSISTENCY WITH RIDGEFIELD URBAN AREA COMPREHENSIVE PLAN LAND USE POLICIES

| Ridgefield Comprehensive Plan Policy | | Consistency with Alt E | Discussion |
|--------------------------------------|--|------------------------|--|
| Section | Summary | Yes or No | |
| LU-2 | Encourage efficient development throughout Ridgefield. Encourage higher density and more intense development in areas that are more extensively served by facilities, particularly by public schools, transportation and transit services. | Yes | Development of Alternatives E would occur within the City of Ridgefield's city boundaries and adjacent to a major freeway. The proposed project would be a high-density development in an area designated for local employment growth and industry. The site is along a major transportation corridor that would provide transit and transportation services. |
| LU-7 | Facilitate development that is human scale and encourages interaction. | Yes | Alternative E would provide recreational and entertainment opportunities for residents and visitors. The increase in patronage would create an increase in commerce and pedestrian access to commercial and retail goods and services. |
| LU-11 | Facilitate development that minimizes adverse impacts to adjacent areas. | Yes | Development of Alternatives E would allow for a future shared circulation system with adjacent development when it occurs. |
| LU-12 | Locate complementary land uses near to one another to maximize opportunities for people to work or shop nearer to where they live. | Yes | The development of Alternative E would provide opportunities for employment. Future developments around the project site could provide services to people working or living in the vicinity. |
| LU-14 | Provide incentives and establish regulations that facilitate revitalization of Downtown Ridgefield and appropriately planned commercial development at the 269th St. and Interstate 5 interchange. | Yes | With recent annexation of the project site, the parcel has been designated as an area of high commercial development value. Alternative E will incorporate an entertainment venue and casino, with a hotel. The project would provide the City of Ridgefield with the means to establish a viable commercial link to commerce along the Interstate 5 corridor. |

Source: City of Ridgefield, 2005, AES, 2008

Consistency with City Land Use and Zoning Designations

Development of Alternative E on the Ridgefield Interchange Site would replace rural residential and agricultural uses with a development similar to Alternative A, including the main casino-hotel complex, ancillary parking structures, RV park, Tribal offices, Tribal elder housing, and a Tribal cultural center. The Ridgefield Interchange Site is currently designated within the RUACP and zoned within the Title 18 of the Ridgefield Municipal Code as Master Planned Business Park. According to the RUACP and Title 18 Development Code, the Master Planned Business Park designation is intended to for a wide range of non-retail employment opportunities within a master-planned, park-like setting that provides for employment-intensive uses, including light manufacturing and wholesale trade, warehousing, business and professional services, research, business and corporate offices and supporting enterprises. Commercial land uses within the Master Planned Business Park designation are allowed, but restricted to approximately 20% of the floor area. Development on the Ridgefield Interchange Site under Alternative E would be mainly commercial in nature, and as such would be generally inconsistent with this designation. However, land uses proposed by the project and those allowed under the Master Planned Business Park designation are generally compatible, and therefore adverse impacts associated with this inconsistency would primarily be limited to increased traffic from commercial development. Additionally, the objective of the Master Planned Business Park designation to create employment opportunities would be accomplished through implementation of Alternative E. Implementation of mitigation measures identified in **Section 5.0** would reduce significant impacts associated with increased traffic (**Section 4.8**), vehicle emissions (**Section 4.4**), and traffic related noise (**Section 4.11**). Potential impacts resulting from inconsistency with the City's existing land use designations are considered less than significant.

Consistency with the Designated UGA City Boundaries for the City of Ridgefield

As a result of the City Council's adoption of Ordinance No. 958, the Ridgefield Interchange Site was annexed within the boundaries of the City of Ridgefield on July 12, 2007. As described above, land uses proposed under Alternative E would be generally inconsistent with the current land use designations identified for the project site within the RUACP. This could interfere with long-term planning by the City of Ridgefield to accommodate anticipated growth within the City. However, land uses proposed by the project and those allowed under the Master Planned Business Park designation are generally compatible. Additionally, the objective of the Master Planned Business Park designation to create employment opportunities would be accomplished through implementation of Alternative D. Adverse effects associated with increased traffic from proposed commercial development would be avoided through mitigation measures recommended in **Section 5.0**. Therefore, impacts are considered less than significant.

Land Use Compatibility

Proposed land uses for the site include a casino-hotel complex, parking facilities, RV park, Tribal headquarters, Tribal elder housing, and a Tribal cultural center. In the short term, rapid urbanization of the rural site has the potential to result in adverse impacts to adjacent sensitive receptors as discussed in detail in the other topical sections of this EIS. Impacts may include, but are not limited to, air quality and noise effects from construction and operational activities (**Sections 4.4 and 4.11** respectively); congestion on rural roads not sized to handle increased traffic (**Section 4.8**); and significant alterations of the visual resources and aesthetics of the surrounding neighborhood (**Section 4.13**). Implementation of mitigation measures identified in **Section 5.0** would reduce significant impacts to less than significant levels. Long-term incompatibility effects are not expected as the area has been planned for increased urbanization with office and non-polluting industry land uses. Because of future planned urbanization and the incorporation of mitigation measures identified in **Section 5.0**, incompatibility with adjacent uses is not expected.

AGRICULTURE

The site is currently used for cattle grazing. Upon implementation of Alternative E, the cattle would be relocated to other pastures. Development of the Ridgefield Interchange Site would convert farmland that has been designated by the NRCS Clark County Soil Survey (2004) as prime agricultural land. Approximately 162.4 acres of the Ridgefield Interchange Site consist of soils that are considered prime and/or unique. However, this represents only approximately 0.1% of the prime farmland in the County (**Appendix Q**). As described in **Section 3.9.5**, Form AD-1006, the Farmland Conversion Impact Rating Form, was used to determine whether the site is farmland subject to the Federal Farmland Policy Protection Act. Sites receiving a total score of less than 160 need not be given further consideration. **Table 3.9-3** shows the scores of the Ridgefield Interchange Site as compared to the total possible score of 160 based upon these criteria. The Ridgefield Interchange Site received a total score of 152. According to USDA recommended thresholds, the site should not be considered for farmland protection. Additionally, the RUACP designates the site for urban development. Because adopted land use plans have already planned for the transformation of productive agricultural land into non-agricultural land, the development of the Ridgefield Interchange Site would result in a less than significant impact to agricultural resources.

4.9.6 ALTERNATIVE F – NO ACTION

LAND USE

Under this alternative, all current land uses would continue to exist on the alternative project sites. No impact would occur under the No Action Alternative.

AGRICULTURE

The No Action Alternative would not preclude agricultural uses on the property.