

4.5 Land and Shoreline Use

This section provides an analysis of potential impacts on land and shoreline use.

4.5.1 Study Area

The study area for land and shoreline use includes the Project site and the 34 parcels immediately adjacent to the Project site. This study area was selected because the properties abutting the Project site would have the greatest potential to be impacted by the change of land use on the Project site.

4.5.2 Relevant Plans, Policies, and Regulations

This section summarizes state and local regulations related to land or shoreline use that are applicable to the Project. There are no known federal regulations on land or shoreline use applicable to the Project.

The proposed Project is located in unincorporated Pierce County within the City of Puyallup’s UGA, a Potential Annexation Area identified as such in both the County and the City’s Comprehensive Plans. The proposed site development plan was submitted to Pierce County on for review under Pierce County Code (PCC). Future development will be reviewed for compliance with PCC development regulations until such time as the City of Puyallup annexes the area.

Relevant state and local policies and regulations related to land and shoreline use are summarized in Table 4-20.

Table 4-20. Applicable Regulations and Policies for Land and Shoreline Use

Law and Regulation	Description
State	
State Environmental Policy Act (Chapter 43.21C RCW)	SEPA helps state and local agencies in Washington identify possible environmental impacts that could result from a proposed action, alternatives to the proposed action, and potential impact minimization and mitigation measures. Information learned through the SEPA review process can be used to change a proposal to reduce likely impacts and inform permitting decisions at the state and local levels. SEPA requires that land and shoreline use, recreation, and aesthetic environmental components be addressed.
Washington State Growth Management Act (GMA) (Chapter 36.70A RCW)	Under the GMA (RCW 36.70A), regions, counties, and large cities must create and regularly update comprehensive plans to identify where growth would occur and to plan for housing, transportation, water, sewer, and other necessary facilities. Both the County and the City are required to plan for growth under the GMA by preparing and periodically updating countywide planning policies that coordinate planning between the county and the cities. Pierce County’s strategy for growth, transportation and economic development are captured in the GMA-mandatory multicounty planning policy (MPP) document produced by the Puget Sound Regional Council (PSRC) Vision 2050 (October 2020). Vision 2050 contains information and policies that Pierce County Regional Council (PCRC) uses to guide the Pierce County Countywide Planning Policies. Both Vision 2050 and the Countywide Planning Policies apply to the Project site. The PCRC includes a body of elected officials set up to coordinate growth management planning efforts county-wide. The City of Puyallup is identified as a Core City, a regional geography within Vision 2050

Law and Regulation	Description
	<p>that refers to a city that contains one or more regionally designated centers and is connected to the high-capacity transit network (Vision 2050).</p> <p>Vision 2050 Multicounty Planning Policies (MPP) MPP-DP-28: Support joint planning between cities, counties, and service providers to work cooperatively in planning for urban unincorporated areas to ensure an orderly transition to city governance, including efforts such as: (a) establishing urban development standards, (b) addressing service and infrastructure financing, and (c) transferring permitting authority.</p>
<p>Washington State Shoreline Management Act (SMA; Chapter 90.58 RCW)</p>	<p>The SMA provides for the management of water bodies or watercourses identified as “shoreslines of the state.” Areas under jurisdiction of the SMA include all marine waters along the Pacific Ocean and Puget Sound; streams and rivers with an annual mean flow of more than 20 cubic feet per second, lakes greater than 20 acres in size, shoreslines adjacent to these water bodies (typically within 200 feet of the water body) and associated wetlands. Comprehensive shoreline master programs are tailored to the local jurisdiction, containing maps and legal descriptions of the delineated streams, rivers, lakes, shoreslines, and wetlands.</p>
<p>Local – Pierce County</p>	
<p>Pierce County Comprehensive Plan (Title 19A PCC)</p>	<p>The Pierce County Comprehensive Plan (Pierce County 2021d) is a policy document that guides growth and future land-use decisions in the County. The County’s Comprehensive Plan was developed to address growth over a 20-year period. The most recent GMA update to the County’s Comprehensive Plan was adopted on June 30, 2015, and became effective on June 30, 2016, with the latest amendments effective October 1, 2021. Table 4-22 includes applicable Pierce County Comprehensive Plan goals and policies pertaining to the Project. Community plans within the Pierce County Comprehensive Plan provide more detailed policies for the specific geographic area. The Project site is located within the Alderton-McMillin community plan area. Goals and policies and a consistency analysis of the Alderton-McMillin Community Plan that relate to the Project are included in Table 4-22.</p> <p>The County is currently reviewing and updating the comprehensive plan to ensure consistency with GMA with a new 20-year planning horizon (2024–2044).</p>
<p>Pierce County Code (PCC)</p>	<p>The PCC (Pierce County 2021a) contains the regulatory, penal, and administrative laws that apply to the County. The PCC was passed through Ordinance 2022-43 on July 19, 2022, and is the primary tool for implementing the goals and policies contained in the Pierce County Comprehensive Plan. The Pierce County Zoning Code (Title 18A Development Regulations – Zoning; Title 18C Development Regulations – Storm Drainage and Site Development; Title 18D Development Regulations – Environmental; Title 18E Development Regulations Critical Areas; Title 18F Development Regulations- Land Divisions and Boundary Changes; Title 18J Design Standards and Guidelines; Title 18S Development Policies and Regulation D) regulates the implementation of growth and development of the City, consistent with the Comprehensive Plan, using methods such as establishing zoning districts and standards for specific land uses.</p>
<p>Pierce County Shoreline Master Program (Title 18S PCC)</p>	<p>The County SMP (Pierce County 2018b) guides the development of the shoreslines in the County. The most recent Pierce County SMP was adopted in 2015 and updated in 2018. It includes policies for uses and conservation of</p>

Law and Regulation	Description
	ecological functions of the identified shorelines, including the Puyallup River. Specific policies relating to the Project are included in Table 4-22. The County's SMP incorporates by reference Title 18E Critical Area regulations (except Chapter 18.70 Flood Hazard Areas)
Local – City of Puyallup	
City of Puyallup Comprehensive Plan (CPCP)	The CPCP (City of Puyallup 2015a) is the long-term vision and plan for managing the built and natural environment in the City and within its UGAs. It includes policy direction for community development, housing, economic development, environmentally sensitive areas, public services, annexation, and related issues. The CPCP was developed under the provisions of the GMA (WAC 365-196) and was initially adopted in September 1994 (Pierce County 2021d). Table 4-22 includes applicable CPCP goals and policies pertaining to the Project.
City of Puyallup Municipal Code (PMC)	The PMC (City of Puyallup 2021d) contains the regulatory, penal, and administrative laws for the City. The PMC is the primary tool for implementing the goals and policies contained in the City of Puyallup Comprehensive Plan. Chapter 20 PMC regulates the implementation of growth and development of the City, consistent with the City of Puyallup Comprehensive Plan, using methods such as establishing zoning districts and standards for specific land uses. The PMC was passed through Ordinance 3258 on September 27, 2022. Per the PMC, and as shown in the City's Zoning Map (2023), the Project is within the boundaries of the City's UGA. A UGA is a geographic area established by a comprehensive plan, and its purpose is to designate areas within which urban growth is encouraged and outside of which growth can only occur if it is not urban in nature (RCW 36.70A.110). The City's land use goals and policies should be consistent with the County's Countywide Planning Policies, specifically pertaining to UGAs (City of Puyallup 2020a).
City of Puyallup Shoreline Master Program	The City SMP (City of Puyallup 2023) guides the development of the shorelines in the City. The most recent City SMP was adopted in December 2022 and includes policies for uses and conservation of ecological functions of the identified shorelines. Specific policies relating to the Project are included in Table 4-22. Within the City, shorelines of the state are designated into three types of environments: Puyallup River – Urban Conservancy, Clarks Creek – Urban Conservancy, and Clarks Creek – Natural. These shoreline environment designations provide a systematic, rational, and equitable basis to guide and regulate development within specific shoreline areas. The designations apply to areas of the shoreline that have similar ecological conditions and similar land uses or potential development patterns. (City of Puyallup 2023).

Source: HDR 2023

Current, planned, and proposed zoning in the Project site is presented in Table 4-21. Uses allowed in these zones are discussed below in Zoning.

Table 4-21. Existing, Future, and Proposed Project Site Zoning by Acre

Site	Zoning	Acres
Existing (Pierce County)	Employment Center	184.17 ^a
EIS - No Action Alternative (Pre-Annexation: Pierce County Comprehensive Plan Land Use - Alderton-McMillin Community Plan)	Employment Center (same as proposed Project)	184.17
EIS - No Action Alternative (Post-Annexation: City of Puyallup Comprehensive Plan Land Use)	Light Manufacturing/Warehousing (LM/W) ^b	38.26
	Business/Industrial Parks (BPI) ^b	58.98
	Auto Oriented Commercial (AOC) ^b	28.16
	Rural Buffer Residential (RBR) ^{a, b}	58.78
Proposed Project (Pierce County)	Employment Center	184.17
Alternative 1 (Pierce County)	Employment Center (same as proposed Project)	184.17
Alternative 2 (Pierce County)	Employment Center (same as proposed Project)	184.17

Source: Comprehensive Plan data from City of Puyallup and Pierce County GIS portals.

^a The total is less than 188 acres as there are approximately 4 acres of public transportation ROW within the Project site.

^b Each of the City of Puyallup designations in this column represents Future Land Use map designations from the CPCP. Various zoning designations could apply upon annexation; no pre-annexation zoning map has yet been developed or adopted by the City.

The County and City have different future land use designations for the Project site; therefore, Table 4-21 shows two potential zoning acreage scenarios for the No Action Alternative: one pre-annexation and one post-annexation. Currently, Pierce County has permitting authority over the site development plans, and its zoning applies to the Project. The City’s zoning designations are not currently applicable but its future land use designations and Comp Plan apply as the project area is located in the City’s UGA. Upon annexation, the City would assume jurisdiction, and its land use (zoning) regulations would go into effect. State, regional, County, and City policy guidance calls for coordination in planning for annexation areas. The jurisdiction in control at the time of completed and submitted land use application will be the applicable authority. As such, both current and future land uses are being evaluated.

4.5.3 Affected Environment

The Project is in the UGA of the City of Puyallup in unincorporated Pierce County. The 188-acre Project site is situated east of Shaw Road East and East Main Avenue, north of East Pioneer Avenue and 88th Street East, and west of the Puyallup River within Sections 25 and 26, Township 20N, Range 4E in the Willamette Meridian baseline. The Project site includes lands that are currently used as farmed agricultural lands and associated single-family residences and is intersected by a 75-foot-wide, high-pressure natural gas transmission pipeline (Williams Northwest Pipeline) easement and an existing stormwater outfall.

This section summarizes the environmental setting related to land use and zoning within the study area.

Land Use

Pierce County

The Project site is within the boundaries of the Alderton-McMillin Community Plan, adopted as part of the Pierce County Code, which describes the dominant land use pattern as resource-based agriculture, forestry, fishing, and mining. A small portion (351 acres) of the community plan area is classified as EC in the Urban zoning designation in the Alderton-McMillin Community Plan (Pierce County 2007).

Figure 4-41 presents Future Land Use Map (FLUM) designations identified in the Pierce County Comprehensive Plan (Pierce County 2019a). FLUM designations on property adjacent to the Project site include Moderate Density Single Family Residential to the southeast and Parks and Recreation to the south. Existing land uses within the Project site boundary include farmed agricultural lands, associated single-family residences, and the Williams Pipeline that transects Parcels #0420253703 and #0420253702. Current uses (unincorporated Pierce County) adjacent to the site include the East Puyallup Foothills Trailhead to the south, Puyallup River to the north and east, and single-family residences to the east and south/southeast.

Land Use is the way the parcel is used; for example: residential, commercial, retail, or industrial, depending on the specific community or environmental context. Comprehensive plans determine the future distribution of land uses around the spaces available in the planning jurisdiction.

City of Puyallup

The study area is located within the valley of a developed commercial, light manufacturing, single-family and multifamily residential area, intermixed with active agriculture activities, adjacent to the Puyallup River, which meanders along the eastern boundary of the Project site.

Figure 4-42 presents the Future Land Use Map (FLUM) designations identified in the CPCM (City of Puyallup 2019a). Puyallup FLUM designations of the parcels within the Project site boundary include Light Manufacturing/Warehousing, Rural Buffer Residential, and Auto-Oriented Commercial. Existing land uses adjacent to the Project site consist of a rail corridor, Limited Manufacturing, Agriculture, Recreation and Open Space Zone (ARO), Shaw-Pioneer Mixed Use (CMX), and Public Facilities (PF). Currently, the Limited Manufacturing parcel is being used as warehouse and distribution (Viking/Life Science Logistics facility), and the Public Facilities parcel is a public park and open space (Van Lierop Park). The ARO parcel is owned and operated by a non-profit (Step-by-Step), and the CMX zoned parcels in the area are generally vacant or being used as active agriculture uses. **City of Puyallup –**

Agricultural set asides

In 2004, Pierce County tried to preserve agricultural resource lands as required by GMA and Countywide Planning Policies during the 2004 Pierce County Comp Plan amendment process. At that time, the County proposed removal of 22 parcels (186 acres) from the City's UGA in the Shaw/Pioneer vicinity, including portions of the project site area. The County also proposed to change the County zoning from EC and MSF to Rural Ten and an agricultural resource designation, Agricultural Resource Lands (ARL). The new ARL designation would have restricted use allowances far more significantly than the existing

EC zoning. This proposal stemmed from the County's required 10-year GMA update and compliance with the preservation of agricultural resource lands as required through GMA and the County CPPs.

This led to discussions with City, County and landowners. This led to a verbal agreement with Pierce County that guided the City Council to adopt Resolution No. 1903 in November, 2004; resolution required adoption of an approach to planning the area that would set aside at least 160 acres of land for farmland. In 2008, the County staff further documented the importance of agricultural set asides for the area where the project site is located, indicating conclusively that "Pierce County would not accept the preservation of less than 160 acres of agricultural lands. (Cardwell, 2008)." The County also outlined that preservation of ag lands in the area of the project site could be reviewed by the Boundary Review Board and would be consistent with RCW 36.93.180 (9) ("Protection of agricultural and rural lands which are designated for long term productive agricultural and resource use by a comprehensive plan adopted by the county legislative authority").

As discussed, the City has designated large areas of the project site as Rural Buffer Residential, mostly as a result of cooperation with County planning efforts and policy objectives under GMA. The zoning implementing RBR includes a zone district known as Agriculture, Recreation and Open Space (ARO). While formal pre-annexation zoning does not apply to the project site areas, the ARO zone designation criteria would support its application in this area. The City's Comprehensive Plan FLUM was formed around planning efforts with Pierce County to accommodate the County's stated priorities to preserve prime agricultural land from conversion to other intensive uses.

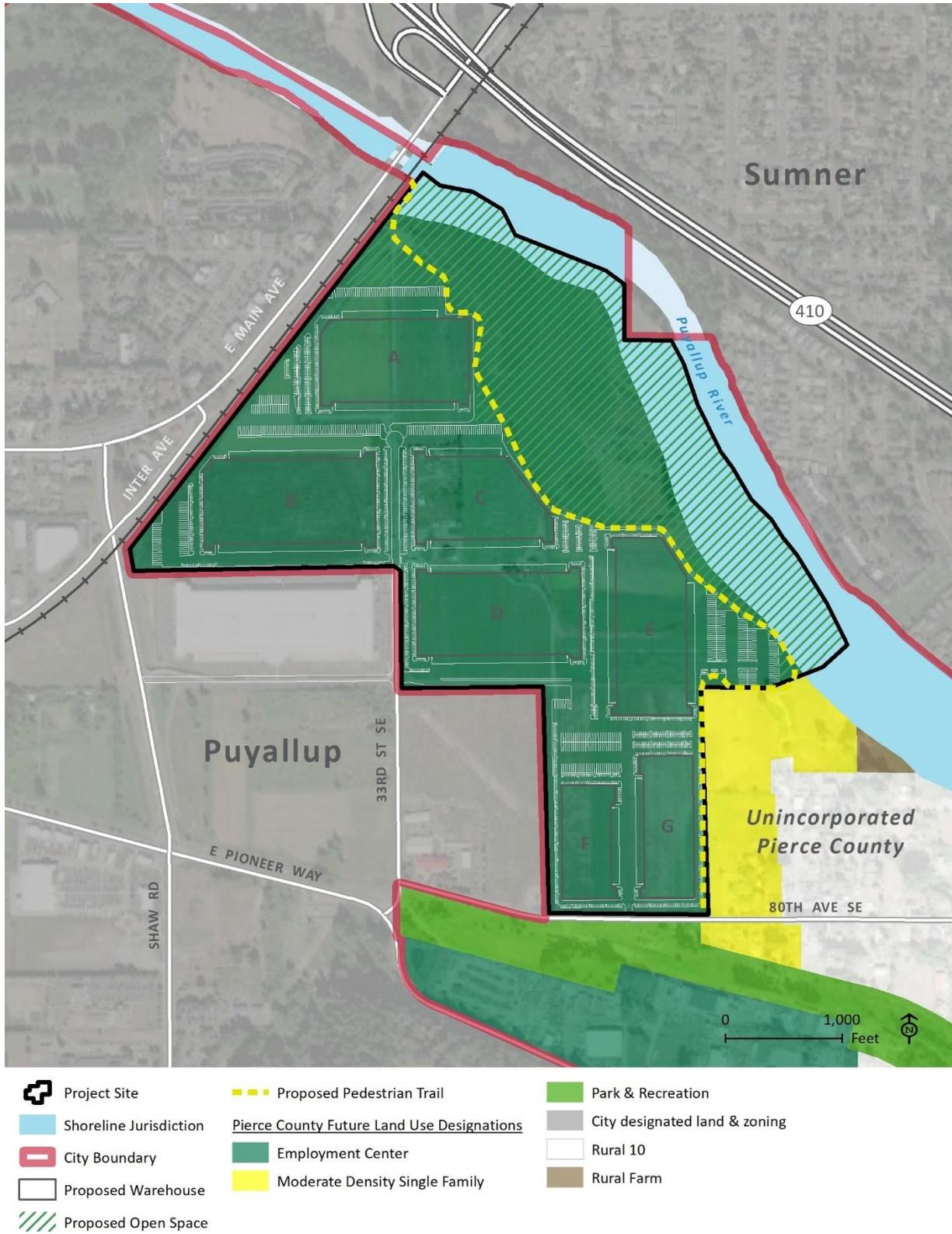


Figure 4-41. Future Land Use Designations (Pierce County Comprehensive Future Land Use Map)

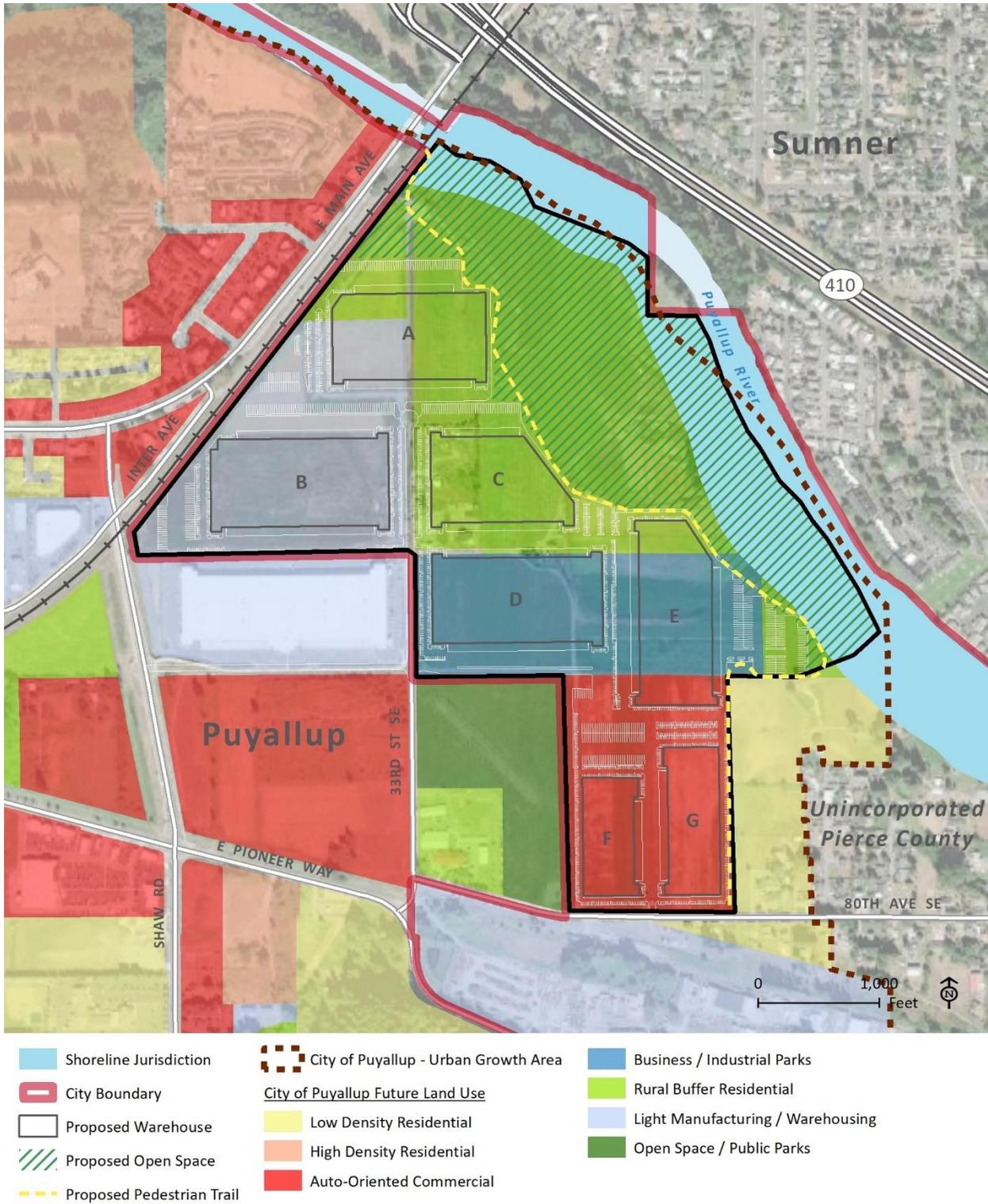


Figure 4-42. Future Land Use Designations (City of Puyallup Comprehensive Land Use Maps)

Pierce County Zoning

Figure 4-43 presents the current zoning districts within the County. These data identify current as well as proposed zoning and land use designations that are adopted by ordinances for unincorporated Pierce County. The Project site has an Urban Zone classification of Employment Center (EC). Per the PCC, an EC is a concentration of low- to high-intensity office parks, manufacturing, and other industrial development, or a combination of activities. The EC zone may also include commercial development as a part of the center if the commercial development is incidental to the employment activities of the center and supports and serves the needs of the workforce (Title 18A.10.080 PCC). Under the EC zone, the Project would be identified in the Industrial Use Category. The Industrial Use Category is described as “*the on-site production, processing, storage, movement, servicing, or repair of goods and materials*” (Title 18A.33.280 PCC).

Zoning is the process by which a county or a municipality legally controls the use of property and physical configuration of development upon tracts of land within its jurisdiction. Zoning is an exercise of police power, and as such must be enacted for the protection of public health, safety, and welfare (Title 18.25.030 PCC)

According to the Alderton-McMillin Community Plan Urban Zone Classifications in Table 18A.18.010 in the EC zone, the Industrial Use Category includes the following types of land uses: basic manufacturing, contractor yards, food and related products, industrial services and repairs, intermediate manufacturing and intermediate/final assembly, off-site hazardous waste treatment and storage facilities, recycling collection and processing facilities, salvage yards/vehicle storage, and warehousing distribution and freight movement. The following are descriptions of use categories based on Title 18A.33.280(A)-(I) PCC and if that use is a permitted use or requires a conditional use permit pursuant to the Alderton-McMillin Community Plan (PCC Table 18.18.010):

- **Basic Manufacturing** (Permitted Use): Uses that involve the primary processing of a raw or initially processed material into a product that requires additional processing, manufacture, or assembly in order to become a consumer good.
- **Contractor Yards** (Permitted Use): An area for construction or contracting business offices, interior or outdoor storage, repair, or maintenance of heavy equipment, vehicles, or construction supplies and materials.
- **Food and Related Products** (Permitted Use): Uses that involve the processing of non-animal food materials, raw milk, ice manufacturing, and other food products manufacturing, processing, storage, and packaging.
- **Industrial Services and Repair** (Permitted Use): Refers to businesses that support industrial and commercial uses by repairing equipment or vehicles; fuel, gas, and oil storage and distribution; bio-tech or high-tech research and laboratories; and/or providing other services integral to the functioning of the industrial or commercial use.
- **Intermediate Manufacturing and Intermediate/Final Assembly** (Permitted Use): Refers to uses that involve intermediate processing of semi-processed material into a consumer good and to uses that involve the assembly of semi-processed and/or intermediate processed products into a consumer good.

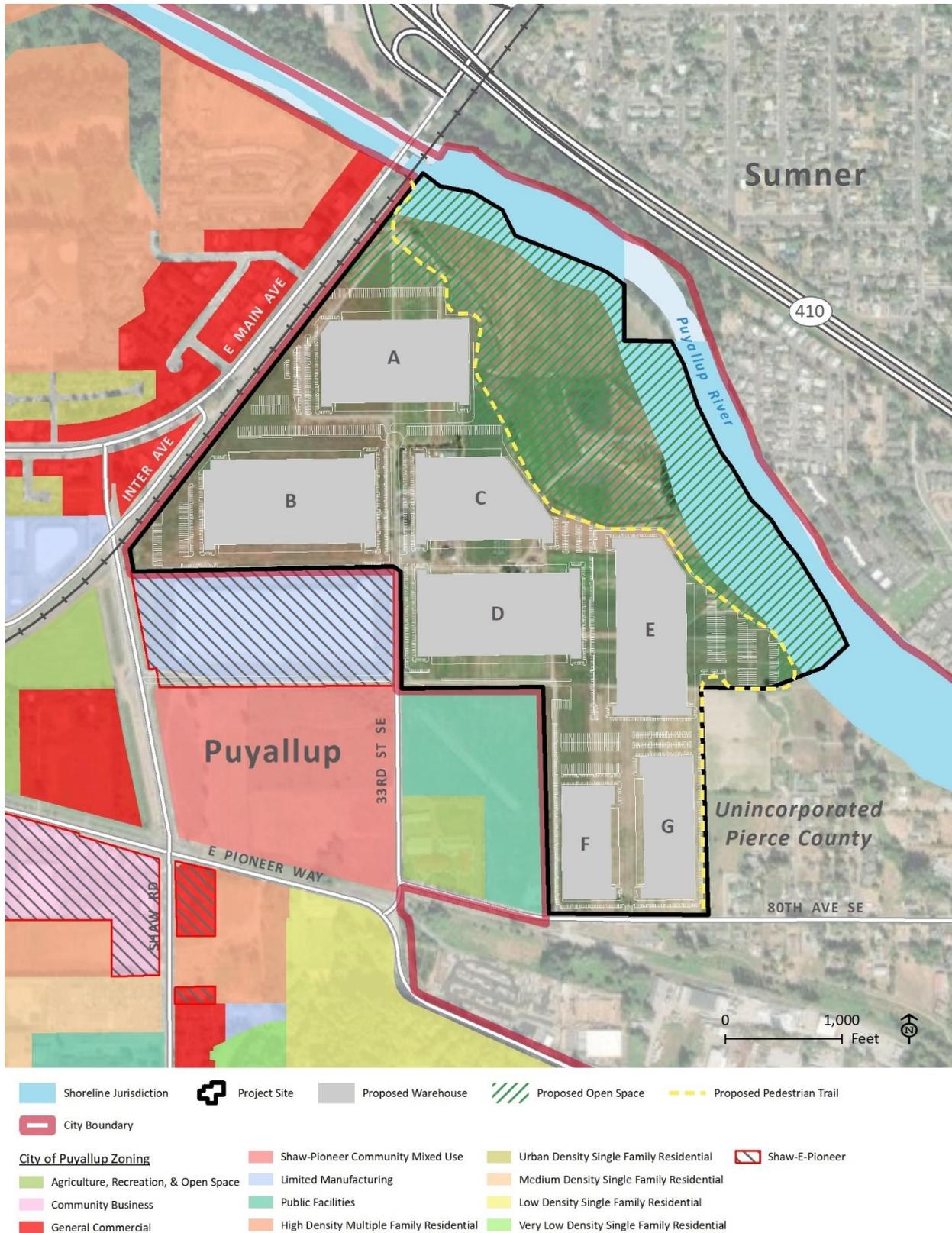


Figure 4-43. Current Zoning Districts within the City of Puyallup

- **Off-Site Hazardous Waste Treatment and Storage Facilities** (Requires a Conditional Use Permit): Facilities that treat and store hazardous waste generated off-site and are authorized pursuant to RCW 70.105. All contiguous land and structures used for recycling, reusing, reclaiming, transferring, storing, or treating hazardous wastes are included. The Project Site's location within a volcanic hazard area does not allow for this type of use. See additional discussion in Section 4.1 Earth Resources and Section 4.10 Health and Safety.
- **Recycling Collection and Processing Facilities** (Permitted Use): Commercial and industrial activities that specialize in accepting, buying, collecting, storing, or processing recyclable materials, excluding activities that fall under the following specific use types: "Organic Waste Processing Facilities," "Waste Disposal Facilities," or "Waste Transfer Facilities."
- **Salvage Yards/Vehicle Storage** (Permitted Use): Uses that involve the salvage of wrecked vehicles, vehicle parts, and appliances; and the storage of vehicles.
- **Warehousing, Distribution and Freight Movement** (Level 1-3 Permitted Uses; Level 4 Requires a Conditional Use Permit): The large-scale warehousing and distribution of manufactured or processed products for one or more businesses; the large-scale distribution of raw, manufactured, or processed products for one or more businesses at a central location; and the central dispatch and servicing of a delivery truck fleet, where no reloading (transfer facility), warehousing, or consolidation of materials takes place on site. PCC Table 18A.33.280-3 provides a description of levels for this use type.

In the EC zone, structures of up to 60 feet in height are permitted (Title 18A.15.040-3 PCC). Building height is defined as *"the height of a building is the vertical distance from the average elevation of the finished grade on each wall of a building to the top of a flat or shed roof, or the deck level on a mansard roof, and the average distance between the bottom of the eaves to the highest point of a pitched, hipped, gambrel, or gable roof"* (Title 18A.15.040(A)(3)) PCC and minimum setbacks of 35 feet front-arterial and 15 feet front-non arterial (Title 18A.15.040.B PCC).

City of Puyallup – adjacent zoning

Figure 4-42 depicts the City of Puyallup's Comprehensive Plan Future Land Use Map designations for land within the City limits and its UGA. Figure 4-43 provides the City's zoning designation for land located within the City limits in the vicinity of the Project site. Puyallup zoning designations adjacent to the Project site include Limited Manufacturing (ML), Shaw-East Pioneer overlay (ML-SPO) zoning on parcel #0420268013 (Viking Warehouse site), and Public Facilities (PF) zoning on parcel #0420253069 and parcel #0420253068 (Van Lierop Park site). As discussed, the City does not have adopted pre-annexation zoning designations on the parcels located within the Project site. City zoning designations of land in the UGA will be determined at the time of annexation.

Zoning Overlays are a regulatory tool that jurisdictions use to create a special zoning district, placed over existing base zoning. An overlay district generally identifies special provisions in addition to those in the underlying base zone, which may regulate or incentivize a specific type of development or resource pattern.

The intent of the ML-SPO designation is to encourage quality development within a framework of neighborhood consistency while still allowing flexibility and creativity; provide streetscape standards that create a walkable, safe, pedestrian-friendly community; and encourage the use of LID principles, techniques, and practices (Chapter 20.46.005 PMC). As an overlay zone, it establishes standards to supplement base zoning standards (City of Puyallup 2020a). The underlying ML zone regulations that govern uses apply to properties in the ML-SPO overlay zone, with the following

additional use standards:

- Outdoor storage uses such as equipment, material, junk, scrap, or vehicle storage areas shall be allowed only if such areas are thoroughly obscured from off-site vantage points, which have the same, similar, or lower elevations than the storage area, by locating such storage area behind street-facing buildings or other structures including walls or vegetation with sufficient growth.
- Outdoor storage uses shall be partially obscured from off-site vantage points, which have higher elevations than such storage areas, by on-site structures or vegetation with sufficient growth.
- Any building area containing loading docks, or parking or impound areas used for equipment or vehicle storage, shall be considered outdoor storage uses for purposes of this section (Chapter 20.46.016 PMC).

The PF designation is for public facilities and applies only to lands owned by governmental agencies for public use or benefit. The City recognizes that public agencies, in attempting to serve the public, have unique needs that cannot be adequately addressed through standard zoning regulations, yet adjacent property owners should be aware of the potential use of neighboring public lands and have assurance of minimum performance standards (City of Puyallup 2020a).

Shorelines

Pierce County

The portion of the Project site that is within the County's shoreline jurisdiction is designated as the Conservancy Shoreline Environment (Conservancy SED) associated with the Puyallup River. The purpose of the Conservancy SED is to conserve and manage existing natural resources and valuable historic and cultural areas while providing recreational benefits to the public and achieving sustained resource utilization and maintenance of floodplain processes (Title 18S.20.040 PCC) (Pierce County 2021d). Commercial and industrial development should be limited to water-oriented commercial and industrial development in instances where those uses have been located in the past, or at unique sites that possess shoreline conditions and services necessary to support the development (County SMP 18S.20.040(B)(7)). Table 4-20 includes applicable County SMP criteria pertaining to the Project; Section 4.2 Surface Water discusses the shoreline as it relates to this chapter.

City of Puyallup

The portion of the Project site that is within the shoreline jurisdiction is designated as the Puyallup River Urban Conservancy Shoreline Environment. The purpose of the Puyallup River Urban Conservancy designation is to protect and restore ecological functions of open space, floodplains, and other sensitive lands along the Puyallup River where they exist in urban and developed settings. This designation allows for a variety of compatible urban uses, including appropriate flood hazard prevention measures, public access, and recreational uses (City of Puyallup 2023). Commercial and industrial developments are allowed uses in the Puyallup River Urban Conservancy designation (City SMP 6(F)(5)(b)), subject to applicable policies, regulations, and permitting procedures of the City SMP and underlying zoning code requirements. No new or expanded building or structure more than 35 feet in height that would obstruct the view of a substantial number of residences is permitted on areas adjoining such shorelines (City SMP Chapter 4 Shoreline Public Access Plan (3.2)(IV)). Table 4-20 includes applicable City SMP criteria pertaining to the Project. Note that the Project is currently in the County jurisdiction and only the County's shoreline designation applies. Post-annexation, the City of Puyallup's shoreline designation would apply.

4.5.4 Impacts

This section describes the potential for environmental impacts related to land use as a result of Project implementation. It describes the thresholds used to determine whether an impact would be significant, as well as measures to mitigate potentially significant impacts, where appropriate.

Methodology

The land use analysis evaluates the Project's potential to result in land use conflicts and/or plan and policy inconsistencies that would consequently be considered land use impacts. If the Project is determined to be inconsistent with the intent of the County's or City's Comprehensive Plan, applicable zoning codes, or other local plans identified, an impact would occur.

This section establishes an evaluation of consistency with the specific applicable goals and policies of both the County and City's adopted Comprehensive Plans and SMPs, the City and County's PROS Plans, and the County's Alderton-McMillin Community Plan; see Table 4-20.

Impacts Analysis

No Action Alternative

Under the No Action Alternative, the Project would not occur. The site would still be a subject of potential annexation, and collaboration between the City and County in planning for this area would still need to occur. The No Action Alternative would be inconsistent with the intent of the County's FLUM and zoning (Employment Center (EC)); however, the No Action Alternative would be more consistent with the Alderton/McMillian neighborhood plan goals for preservation of existing character and the County's Comprehensive Plan objectives to preserve prime farmland. If the Project did not occur, other opportunities for job-generating development on the site remain in the form of agricultural employment. There is a potential for inconsistency with both the City and County's Comprehensive Plan policies that require planning for economic and employment growth. The CPCP designates large areas of

the Project site area as set aside for ARO, but some future land use map areas designate this area for business park, industrial, and commercial development.

Proposed Project

Construction Impacts

Significant with Mitigation. Construction would be conducted in accordance with applicable policies and regulations of agencies with jurisdiction or discretionary authority over one or more of the Project components. The Project site includes prime farmland, currently used as farmed agricultural lands and associated single-family residences. During construction, these agricultural uses and residences would be removed. Construction of the Project would result in temporary environmental impacts within the Project site, as identified and addressed in sections of this EIS (Section 4.1 Earth Resources, mitigation measures ER-1 through ER-10; Section 4.5 Land and Shoreline Use, mitigation measures LU-1 through LU-4; Section 4.6 Aesthetics, mitigation measure AES-1; Section 4.7 Recreation, mitigation measures REC-1 through REC-3; Section 4.10 Health and Safety, mitigation measures HS-1 through HS-5; and Section 4.13 Noise, mitigation measures N-1 and N-2).

Operations Impacts

Mitigated Significant Impact. The County currently has jurisdiction over the Project site; however, the City's future land use designations and Comprehensive Plan policies for the Project site are also relevant given that the area is within the City's UGA in a Potential Annexation Area recognized by both the City and County.

The Project is inconsistent with development regulations including critical areas (Title 18E). Currently, there is no approved mitigation plan addressing Wetland D impacts, and any fill at Wetland D as currently proposed would result in a net loss of wetland and buffer area during construction phases. This is a significant impact and is in conflict with no-net loss policies at federal, state, and local levels. Protection of listed species is required under federal and local law and in relation to current Project site design. Stormwater flow and treatment and source control BMPs designed to reduce impacts from the tire oxidant pollutant are currently not implemented in the proposed stormwater management plan. Without appropriate treatment, research indicates moderate to high potential for take of listed species near the stormwater outfall and potential for downstream impacts to other species from bioaccumulation. This would be inconsistent with Pierce County's Comprehensive Plan policies for using best available science and adaptive management for critical areas (Goal ENV-14, Goal ENV-15, Policy ENV-15.3). See Section 4.4 Plants and Animals for a discussion of impacts to wetlands and listed species.

The Project is consistent with County zoning and future land use designations, but the Project is inconsistent with the City's future land use designations. As such, development of the Project as planned could result in nonconforming uses post-annexation that create challenges for the City in implementing the long-range vision outlined in its Comprehensive Plan. Regional, County, and City policies call for interjurisdictional collaboration in planning for annexation areas and future needs (Vision 2050 MPP-DP-28, Pierce County Countywide Planning Policies UGA 4.3, Pierce County Comprehensive Plan LU-4 and LU-4.2.6, and City of Puyallup Goal LU-8).

Table 4-22 provides an evaluation of the Project's consistency with the goals and policies of both the County's and City's adopted Comprehensive Plans, SMPs, PROS Plans, and the Pierce County Alderton-McMillin Community Plan. Table 4-22 also provides a consistency analysis of goals and policies related to the City's UGA, regional growth, and employment center development in the County, or similar, that are contained in applicable plans and regulations. The corresponding statement identifies whether the Project is consistent, inconsistent, or inconclusive with the goal or policy.

As provided in Table 4-22, the evaluation indicates that the Project would be inconsistent with County policies around intensity of the site's use; compatibility with surrounding uses, critical areas, and utility and street capacity (Pierce County Comprehensive Plan Policies LU-44.6, LU-46.1, LU-46.2, LU-47.4, LU-47.9, LU-47.11); the Project's interference with connecting the surrounding community (Pierce County Comprehensive Plan Goal PR-10, Policy PR-17.1); preservation of prime farmland and community character (AM D-1); and absence of a proposal to include restoration of shoreline ecological functions as part of industrial development (Pierce County SMP Policy B-1).

Table 4-22. Project Consistency with Applicable Plans and Regulations

Plan	Goal/Policy	Consistency Determination
<p>Pierce County Comprehensive Plan</p>	<p>Environmental Element</p>	
	<p>GOAL ENV-8. Maintain and protect habitat conservation areas for fish and wildlife.</p>	<p>Inconsistent. In addition to potential for erosion and sediment impacts to the Puyallup River from the existing outfall structure, increased runoff volumes from paved surfaces within the new warehouse complex may have significant impacts to listed and sensitive salmonids in the Puyallup River. Stormwater flow and treatment and source control BMPs designed to reduce impacts from the tire oxidant pollutant are currently not implemented in the proposed stormwater management plan.</p>
	<p>Policy ENV-8.4. Emphasize the importance of healthy riparian corridors.</p>	<p>Inconsistent. There is no current plan from the Project for assessment, repair or replanting to address existing current conditions, including loss of planted habitat mitigation vegetation surrounding and outside of the outfall structure, and including loss of bioengineering vegetation within the outfall structure, and erosion and loss of the riverbank at the outside edge of the outfall. Without this work to correct deficiencies in the outfall structure (as described in the NHC and SCJ, February 2023, Viking Warehouse Facility Stormwater Outfall Deficiencies Report), future impacts to the outfall from a significant increase in future stormwater volumes from the new Project warehouse complex may result in significant impacts from loss of vegetation, erosion and bank failure.</p>
	<p>ENV-8.7. Encourage landowners to maintain and enhance habitat areas.</p>	<p>Inconclusive. There is no current plan from the Project that identifies maintenance or enhancement of habitat areas.</p>
<p>GOAL ENV-9. Maintain and where necessary improve terrestrial and aquatic ecosystems so that they maintain viable, reproducing populations of plants and animals.</p>	<p>Inconsistent. As currently proposed, the Project stormwater management plan would decrease seasonal stormwater infiltration across the upper terrace which may result in a decrease in floodplain wetland habitats, an increase in erosion potential and sediment movement at the edge of the river, and an increase in polluted runoff from upland paved surfaces. This would impact the Puyallup River and floodplain habitats during both Construction and Operational phases.</p>	

Plan	Goal/Policy	Consistency Determination
	GOAL ENV-15. Recognize the value of adaptive management for providing flexibility in administering critical area and shoreline regulations.	Inconsistent. As currently proposed, the Project does not include adaptive management for critical areas. Mitigation Measure P&A-3 and SW-2 recommend re-evaluating the current stormwater management strategy for the Project and potentially use LID infiltration.
	Policy ENV-15.2. Prioritize post-project compliance monitoring.	Consistent. Mitigation Measure SW-5 proposes long-term groundwater monitoring during operations to document the success of proposed hydrology support.
	Policy ENV-15.5. Require that regulated activities occur with avoidance of impacts as the highest priority and apply lower priority measures only when higher priority measures are determined to be infeasible or inapplicable (see Table 7-A).	Consistent. Mitigation Measure SW-4 proposes groundwater and surface water monitoring prior to final Project site design and permitting to define the hydroperiod for on-site wetlands (A, B, C, and D), and use the resulting information to put plans in place for providing adequate wetland hydrology during both construction and operation phases. Mitigation Measure SW-6 outlines the steps for Wetland D impacts avoidance.
Pierce County Comprehensive Plan	Land Use Element – Employment Center (EC) Section	
	Policy LU-4.2.6. Ensure that the County’s land use designations and associated development regulations are consistent with a city or town’s land use plans within its respective Potential Annexation Areas.	Inconsistent. If the land is developed under the County's jurisdiction, it would be inconsistent with the long-range planning of the City and would impact local control of how the City's planning goals can be implemented. The County under CPPs has an obligation to coordinate with cities regarding development within their UGA/Potential Annexation Area (PAA). The County is required to work with local jurisdictions on how land within UGA/PAA are zoned, what the allowed uses are, and development.
	Goal LU-44. Designate industrial areas. Policy LU-44.2. Adjacent to or in proximity to land designated EC.	Consistent. Per uses allowed within the Pierce County Zoning Code for areas designated as “Employment Center,” the Project is anticipated to consist of basic manufacturing, contractor yards, food and related products, industrial services and repairs, intermediate manufacturing and intermediate/final assembly, off-site hazardous waste treatment and storage facilities, recycling collection and processing facilities, salvage yards/vehicle storage, and warehousing distribution and freight movement.

Plan	Goal/Policy	Consistency Determination
	Policy LU-44.3. Within proximity to major transportation thoroughfares, including rail.	Consistent. The Project is near major transportation thoroughfares of Highways 410, 167, and 512. Additionally, a rail line runs north-east diagonally along the westernmost Project boundary.
	Policy LU-44.5. Near historical employment generating operations.	Inconsistent. The Project is within an area of the Alderton-McMillin Community Plan, which is characterized as rural development. The Economic section of the Alderton-McMillin Community Plan does not address the Employment Center designation, but rather focuses on agriculture. Development of the Project proposal would be inconsistent with that Community Plan objective.
	Policy LU-44.6. On properties that are not constrained by significant critical areas such as wetlands, steep slopes or other environmental factors limiting development potential.	Inconsistent. The Project is on a property that is constrained by critical areas and other environmental constraints.
	Policy LU-44.7. Characterized by larger parcels, typically averaging more than five acres.	Consistent. The Project is proposing up to 2.6 million SF of building area on the approximately 188-acre Knutson Farm property.
	Policy LU-44.9. In a manner which attracts and retains businesses.	Inconclusive. The Project would attract business by seeking occupants of the development, once completed. Currently, businesses are not known and so the attraction and retention of businesses cannot be predicted.
	Policy LU-44.10. Geographically dispersed throughout the County to meet the industrial and manufacturing needs of a growing jobs-based economy.	Consistent. The Project would be one development that is part of County efforts to meet the industrial and manufacturing needs of the County economy. The final occupancies are currently unknown; the proposal anticipates approximately 1,500 full-time employees.
	Policy LU-44.11 (Designate industrial areas). Only if there is a demonstrated need to provide for more land in the area based on shortages of developable land, and when the expansion is compatible with any applicable community plan.	Inconsistent. It has not been demonstrated that there is a need to provide more land based on shortages of developable land. Further, this development would be incompatible with the Alderton-McMillan Community Plan, so even if there is a demonstratable need, this location would be incompatible.
	Goal LU-46. Promote the grouping of uses that will mutually benefit each other or provide needed services.	Inconclusive. The Project is anticipated to consist of uses consistent with the restrictive covenant (Industrial Park permitted; high cube fulfillment centers prohibited) and EC

Plan	Goal/Policy	Consistency Determination
	<p>Policy LU-46.1. Encourage planned developments of multiple buildings or uses which provide a mixture of low and moderate-intensity industrial, research, office, and supporting commercial uses.</p>	<p>zoning. The final occupancies are currently unknown; therefore, ambiguity of the end user(s) of the site do not allow for a clear determination of consistency with this policy of a mix of user types and/or development intensities.</p>
	<p>Policy LU-46.2. Encourage intensive manufacturing businesses to be clustered in industrial parks along major transportation links to minimize the impact on less intensive surrounding land uses.</p>	<p>Inconclusive. The Project is anticipated to consist of uses consistent with the restrictive covenant (Industrial Park permitted; high cube fulfillment centers prohibited) and EC zoning. The final occupancies are currently unknown; therefore, ambiguity of the end user(s) of the site do not allow for a clear determination of consistency with this policy of a mix of user types and/or development intensities.</p>
	<p>Goal LU-47. Provide a diverse range of goods and services to ensure that as the economy changes, employment opportunities are balanced with a wide range of other land uses.</p> <p>Policy LU-47.4. Location and design should facilitate access and circulation by transit, car and van pools, pedestrians, bicyclists, and other alternative transportation modes.</p>	<p>Inconsistent. The Project may be able to accommodate transit, car, and van pool access; however, end users of the site may or may not facilitate alternate modes of transport, so a finding of consistency is not possible at this stage. Limited pedestrians and bicyclists access through the construction of an on-site pedestrian trail that connections to the Puyallup Riverwalk regional trails, but does not allow for an east/west trail connection from the Van Lierop Park.</p>
	<p>Policy LU-47.5. Encourage developments to consider visibility and convenient access from major arterials and highways, proximity to environmentally sensitive lands, and the desired character of the industrial area.</p>	<p>Inconsistent. The Project would be near Highways 410, 167, and 512 and major arterials, such as Shaw Road, East Main, and East Pioneer Avenue; however, the impacts of the Project would more broadly impact the ease and convenience of access to these transportation corridors and network by the general public. The intensity of the development near environmentally sensitive lands and the visual impacts of the development’s characteristics would cause visual impacts on the area, in particular to Van Lierop Park which was established to preserve the view corridor to Mount Rainier.</p>
	<p>Policy LU-47.7. Prohibit new detached single-family residential with limited exceptions.</p>	<p>Consistent. The Project does not propose new detached single-family residential and would not interfere with this policy.</p>
	<p>Policy LU-47.8. Development should be required to undergo a formal site plan review process to minimize impacts on neighboring properties.</p>	<p>Inconclusive. The policy is consistent in that the County requires site plan design and is required to notify neighbors of the review process, to allow public input and consideration of local impact minimization. Prior to approval for construction, the Project</p>

Plan	Goal/Policy	Consistency Determination
		<p>would be subject to design review during the permitting process with Pierce County. According to Pierce County Planning and Land Services, “The design review process is a tool intended to ensure that new development enhances the visual quality and identity of communities and is compatible with the community character. Through design review, builders, developers, business owners, residents, and property owners work with Planning and Public Works (PPW) staff and/or the applicable land use advisory commission (LUAC) to protect identified community values through the application of design principles. (...) principles illustrated in the individual design standards are intended to implement the goals, objectives, and policies of community plans and the Pierce County Comprehensive Plan by encouraging development that is compatible with and complementary to the examples of good design observed within the community(ies) (Title 18J.15.085 PCC).”</p>
	<p>Policy LU-47.9. Encourage master planning for industrial areas, including such features as open space, landscaping, integrated signage, traffic control, and overall management and maintenance through covenants or other property management techniques.</p>	<p>Inconsistent. The Project is inconsistent due to the clear lack of master planning of the overall Project, despite the substantial size of the Project site and total building square footage; the Project lacks a coherent plan for open spaces within the development envelope, minimal landscaping set asides, no signage plan presently, traffic impacts that are significant without a clear presentation of controls to adequately mitigate an unknown set of end user(s) and a lack of details regarding overall site management and maintenance approaches to meet this policy.</p>
	<p>Policy LU-47.10. Encourage large, contiguously owned properties to be developed as a unified whole.</p>	<p>Consistent. The Project would be developed on contiguously owned parcels as one development.</p>
	<p>Policy LU-47.11. Provide sites with a variety of parcel sizes to accommodate both large and small businesses, and particularly those of sufficient size to permit development of large industrial facilities.</p>	<p>Inconsistent. The Project is proposing development of seven warehouses, each varying in size from approximately 190,000 SF to 490,000 SF; the Project application lacks a substantiated set of factors that would allow a clear determination about the end user size as small or large businesses. Given that the Project is a large industrial facility, a lack of clarity on business sizes and the clear policy desire to provide space for small and large businesses on the site, the Project is presently inconsistent.</p>

Plan	Goal/Policy	Consistency Determination
<p>Pierce County Comprehensive Plan</p>	<p>Land Use Element – Employment Center (EC) Section</p>	
	<p>Goal LU-4: Facilitate the transformation of unincorporated urban areas into cities and towns through annexation.</p> <p>LU-4.2.6: Ensure that the County’s land use designations and associated development regulations are consistent with a city or town’s land use plans within its respective Potential Annexation Areas</p>	<p>Inconsistent. If the land is developed under the County's jurisdiction, it would be inconsistent with the long-range planning of the City (as noted, the development of the City’s FLUM was directly a result of the County’s efforts to preserve agricultural land on the Project site) and would impact local control of how the City's planning goals can be implemented. The County under CPPs has an obligation to coordinate with cities regarding development within their UGA/PAA. The County is required to be working with local jurisdictions on how land within UGA/PAA are zoned, what the allowed uses are and development.</p>
	<p>Parks and Recreation Element (Note: contains same policies as Pierce County PROS Plan)</p>	
	<p>Policy PR-1.3. Ensure the park system is integrated with and complements other park and recreation service providers in Pierce County.</p>	<p>Inconsistent. The Project would disrupt the existing park system that supports region-wide park and recreation opportunities, including within the City of Puyallup and the City of Sumner.</p>
	<p>GOAL PR-5: Develop facilities that exemplify sustainable practices, connect to surrounding neighborhoods, universally accessible, safe, and cost effective to maintain.</p> <p>PR-5.6. Incorporate scenic viewpoints.</p>	<p>Inconsistent. The Project proposes construction of Building F, which would interfere with the Van Lierop Park’s view corridor of Mount Rainier. Additionally, the viewshed of Mount Rainier from viewer groups to the north of the Project site, including those on the nearby Riverwalk Trail and members of the public using roadways, sidewalks, and surrounding businesses and residents.</p>
	<p>PR-5.7. Buffer facilities from incompatible uses.</p>	<p>Inconsistent. The Project is a warehouse development proposal and would be incompatible with neighboring uses. A lack of physical separation and landscape buffer planning on the site plan does not demonstrate buffering the site from lower intensity uses, such as low density residential, agricultural land uses, public parks and trails and other institutional uses in the area. These factors are wholly under-considered and not addressed by the proposed development’s adopted PROS plans for the Riverwalk Trail and is adjacent to the proposed intense industrial/warehouse activity, which could discourage use. Additionally, the Applicant is proposing to vacate public ROWs that would not</p>

Plan	Goal/Policy	Consistency Determination
		encourage connection to the area, but rather could introduce a disconnect in and to the Project site.
	Goal PR-10. Provide a connected system of trails that link communities to parks, open spaces, public facilities, and areas of interest and provide nonmotorized transportation and recreation opportunities.	Inconsistent. The Project is a development proposal, which includes a pedestrian trail connecting the existing Puyallup River Riverwalk Trail and Foothills Trail. However, the trail would not conform to the Pierce County Parks, Recreation and Open Space Plan (PROS) adopted PROS plans for the Riverwalk Trail and is adjacent to the proposed intense industrial/warehouse activity, which could discourage use. Additionally, the Applicant is proposing to vacate public ROW that would not encourage connection to the area, but rather could introduce a disconnect in and to the Project site.
	GOAL PR-17 Provide and enhance connectivity to important County and regional destinations, between multiple jurisdictions, and to neighboring counties. PR-17.1. Create connections between key community destinations.	Inconsistent. The Project is a development proposal, which includes a pedestrian trail connecting the existing Puyallup River Riverwalk Trail and Foothills Trail. However, the trail would not conform to the Pierce County Parks, Recreation and Open Space Plan (PROS) adopted PROS plans for the Riverwalk Trail and is adjacent to the proposed intense industrial/warehouse activity, which could discourage use. Additionally, the Applicant is proposing to vacate public ROWs that would not encourage connection to the area, but rather could introduce a disconnect in and to the Project site.
	GOAL PR-19. Provide public waterfront access through the provision of public piers, swimming beaches, motorized and nonmotorized boat launches, public boat moorage, and water viewpoints.	Inconsistent. The Project would not provide public waterfront access. The proposed pedestrian trail is largely through, and on the edges of, the proposed Project and is not visually or physically connected to the shoreline.
	PR-19.3. Provide access to shorelines in a manner that is aesthetically compatible with the adjacent properties and sensitive to ecological function.	Inconsistent. The Project is a development proposal that does not include a pedestrian trail in the preferred shoreline location.
	Goal PR-21. Provide a system of open space experiences and corridors to support livable communities, offer relief from the built environment, allow people to connect with nature, and ensure the long-term health of the natural environment and citizens.	Inconsistent. The proposed trail would not conform to the Pierce County Parks, Recreation and adopted PROS plans for the Riverwalk Trail and is adjacent to the proposed intense industrial/warehouse activity, which could discourage use and open spaces for people to enjoy.

Plan	Goal/Policy	Consistency Determination
	Policy PR-21.3. Provide open space corridors within the City's UGA to protect wildlife corridors, provide open spaces for people to enjoy and to create buffers between communities.	
Pierce County Alderton-McMillin Community Plan	Land Use Policies	
	GOAL AM LU-1 Ensure the Alderton-McMillin community remains rural in character over the next 20 years.	Inconsistent. The Project is proposing development of seven warehouses, each varying in size from approximately 190,000 SF to 490,000 SF, which is inconsistent with the rural character.
	Policy AM LU-1.2. To maintain and preserve the rural character of the Alderton-McMillin community, the following types of non-agricultural activities are considered incompatible with rural character: Activities that generate constant, ongoing noise (AM LU 1.2.1); Activities that generate large amounts of traffic within a short duration (AM LU-1.2.2); Activities that operate into night hours (AM LU 1.2.4); or activities that require extensive lighting or lighting that spills onto neighboring properties (AM LU-1.2.5).	Inconsistent. As proposed, the Project would generate noise, traffic operations at night, modify an area of the community with significant rural qualities, and require extensive lighting.
	Community Design	
	GOAL AM D-1. Promote commercial and industrial development that is visually attractive, and compatible with the residential character and agricultural identity of the community while being respectful to the natural environment. Policy AM D-1.1. Implement low impact development design standards where feasible. Policy AM D-1.2. Locate required vegetation in a manner that provides buffering/screening between industrial and non-industrial lands. Policy AM D-1.3. Outdoor lighting should enhance visibility and security without projecting excessive glare on surrounding property or into the night sky.	Inconsistent. The Project would convert the existing 188-acre property, currently either in agricultural use or vacant land to a warehouse development, which is not conducive to rural and agricultural character, and is wholly inconsistent with the Community Plan goals around preservation of agricultural land and rural character. Further, with respect to the natural environment, the Project could result in the spread and colonization of noxious weeds; cause erosion and sediment movement degrading nearby native wetland and riparian vegetation communities in the floodplain.
	Title 18S.40.050 PCC Commercial, Civic and Industrial	

Plan	Goal/Policy	Consistency Determination
<p>Pierce County Shoreline Master Program</p>	<p>Policy B-1. Encourage restoration of impaired shoreline ecological functions and processes as part of commercial, civic, and industrial development.</p>	<p>Inconsistent. The existing shoreline ecological functions of the portion of the Puyallup River shoreline jurisdiction within which the Project is located is currently impaired. The Project, as proposed, does not include restoration of shoreline ecological functions. Therefore, the Project would interfere with implementation of this policy.</p>
	<p>Policy B-3. Encourage multiple-use concepts such as including open space and recreation in commercial, civic, and industrial development.</p>	<p>Inconsistent. The Project would maintain approximately 62 acres of open space on the northern portion of the site and includes some trail recreational aspects; however, the Project does not include an overall multi-use plan that integrates open spaces, recreation or public access to shorelines in a comprehensive or coherent fashion. The open space set aside appears to be only connected to critical area protections and not a comprehensive approach to shoreline open space planning. The Project appears to be entirely disconnected from shoreline planning in this regard and is therefore inconsistent with balancing multiple use concepts.</p>
	<p>Policy B-4. Maximize use of existing ports and other industrial areas prior to expansion or development of new industrial sites.</p>	<p>Inconsistent. There is only one other existing warehouse adjacent to the site (Viking warehouse structure, 0.3 mile from the Puyallup River); there are no other similar uses adjacent to the site. The Project’s need for newly expanded industrial areas adjacent to and within the Puyallup River shoreline has not been established. .</p>
	<p>SMP Management Polices for the Conservancy SED PCC 8S.20.040B - 3, 6, 7 SMP policies PCC 18S.30.030B. Ecological Protection</p> <p>5. Plan for the enhancement of impaired ecological functions where feasible and appropriate while accommodating permitted uses and development. As shoreline modifications occur, incorporate all feasible measures to protect ecological shoreline functions and ecosystem-wide processes.</p> <p>6. Preserve and protect existing trees and native vegetation within shorelines to maintain shoreline ecological functions and</p>	<p>Inconsistent. There is no current plan from the Project for assessment, repair or replanting to address existing current conditions, including loss of planted habitat mitigation vegetation surrounding and outside of the outfall structure, and including loss of bioengineering vegetation within the outfall structure, and erosion and loss of the riverbank at the outside edge of the outfall. Without this work to correct deficiencies in the outfall structure (as described in the NHC and SCJ, February 2023, Viking Warehouse Facility Stormwater Outfall Deficiencies Report), future impacts to the outfall from a significant increase in future stormwater volumes from the new Project warehouse complex</p>

Plan	Goal/Policy	Consistency Determination
	<p>mitigate the direct, indirect, and cumulative impacts of shoreline development. Where shoreline vegetation is inadequate to protect against the impact of new uses or development, native vegetation should be enhanced.</p> <p>7. Avoid impacts to shorelines through application of mitigation sequencing, giving highest priority to impact avoidance whenever new uses or development are proposed in shorelines.</p>	<p>may result in significant impacts from loss of vegetation, erosion, and bank failure.</p>
<p>City of Puyallup Comprehensive Plan</p>	<p>Natural Environment Element</p>	
	<p>Policy NE-13.2. Design and construct night lighting to minimize excessive glare and to avoid spillover onto nearby properties.</p>	<p>Inconclusive. The Applicant has not provided building designs and a conclusion cannot be made at this time. During building permit and design, the Project would be checked for compliance with local building code regulations, including Title 18J.15.085 PCC Exterior Illumination, which requires installation of lighting that would not spill over onto nearby properties, promotes compatibility between land uses by reducing light impacts on users of the site and surrounding areas, and avoids and minimize glares and light trespass beyond the illuminated area.</p>
	<p>Land Use Element</p>	
	<p>Policy LU-2.3. Promote economic development projects which contribute to making Puyallup a major employment center.</p>	<p>Consistent. The Project would employ approximately 1,500 employees.</p>
	<p>Policy LU-23.3. Limit the percentage of any business/industrial park development devoted to warehouse uses to encourage relatively high employee generation and high intensity of space utilization</p>	<p>Inconclusive. Due to the lack of certainty and specificity regarding end users of the site structures, the ultimate build out of the development could be consistent or inconsistent.</p>
<p>Goal LU-6. The City shall maintain an urban growth area and develop a strategy for annexation within said area.</p>	<p>Inconsistent. The Project would not comply with the City's strategy for annexation areas. The Project is inconsistent with the City's future land use designations and as such development of the Project as planned could result in nonconforming uses post-annexation that create challenges for the City in implementing the long-range vision outlined in its Comprehensive Plan.</p>	
<p>Goal LU-8. Coordinate and cooperate with regional jurisdictions and agencies to meet present day needs and continually plan for the future.</p>	<p>Inconsistent. The Project is in the UGA of the City in the unincorporated County and a Potential Annexation area recognized by both the City and County. The Project would be</p>	

Plan	Goal/Policy	Consistency Determination
		<p>inconsistent with the City’s future land use designations, which would also conflict with interjurisdictional collaboration in planning for annexation areas and future needs.</p>
	<p>LU – 11. Designate rural buffer residential in limited areas in the city, allowing 1 dwelling unit per acre.</p> <p>LU - 11.1. Preserve areas of residential development, which are encumbered by critical areas or unserved by utilities that would facilitate urban levels of development and intended to serve as a permanent buffer at the edges of or within the community.</p> <p>LU - 11.2. Rural buffer residential areas shall be allowed levels of service generally lower than for areas designated for urban uses.</p>	<p>Inconsistent. The Project is proposing development of seven warehouses, each varying in size from approximately 190,000 SF to 490,000 SF. The Project would not be consistent with the rural buffer residential designation of the site with development consisting of an intense urban use.</p>
	<p>Goal LU – 21. Provide industrial, business and research centers that promote economic growth, provide living wage jobs and meet the employment growth targets set by Pierce County Planning Policies.</p>	<p>Inconclusive. The Project would encompass uses similar to industrial, business, and research centers. Pierce County’s adopted employment growth targets includes 9,000 jobs between 2008 and 2030 in Puyallup (Pierce County Ordinance No. 2011-36s). Unincorporated Pierce County is currently in need of fulfilling approximately 16,569 jobs between 2008 and 2030. The Project would contribute to the economic growth and jobs market by adding up to approximately 300 employees for construction of each warehouse and approximately 1,500 employees during operations. However, it is unknown what the wages of employees as the occupation of the warehouses is unknown. The minimum wage in Washington State in 2023 is \$15.74 per hour (WA DLI 2022).</p>
	<p>Policy LU-22.3. Buffer industrial areas from single-family residential zones through the use of extensive vegetative buffers or landscaped berms.</p>	<p>Inconsistent. The Project includes the construction of seven warehouses, some of which are in the rural buffer residential future land use area. The rural buffer residential area is intended to serve as a permanent buffer (See LU-11.1). While City code requires landscaping and landscape buffers, urban level commercial construction with the RBR overlay is contrary to goals of LU-22.3 and LU-11.</p>

Plan	Goal/Policy	Consistency Determination
	<p>Policy LU-22.5. If agricultural lands are converted to industrial uses, they should be phased in a manner that provides high employee generation and visual amenities.</p>	<p>Inconclusive. The Project site includes lands currently used for agriculture, with associated single-family residences. During construction, these agricultural lands, residences, and other farming-related structures would be removed. Construction of the Project would employ approximately 300 employees for the 5-year construction period and 1,500 employees during operation, which is approximately 16 percent of Pierce County’s adopted employment growth target. The Project would not provide visual amenities as there is a visual impact to Van Lierop Park.</p>
	<p>LU - 23.3. Limit the percentage of any business/industrial park development devoted to warehouse uses to encourage relatively high employee generation and high intensity of space utilization.</p>	<p>Inconsistent. The Project would generate approximately 1,500 employees during operations. The Project footprint would be approximately 68 percent of the parcel, but the Project would result in a high intensity of space utilization as it would be 100 percent the same use. The number of employees generated over a 188-acre site is low considering the high-intensity utilization of space.</p>
	<p>LU – 24. Focus most of the City’s employment and residential growth within the two Regional Growth Centers (RGCs).</p>	<p>Inconsistent. The City has two RGCs, Puyallup Downtown and Puyallup South Hill. The Project is not within either of the City’s RGCs.</p>
	<p>Community Character Element</p>	
	<p>Policy CC-1.1. Maintain the identity and character of established residential neighborhoods through appropriate landscaping and site design of new developments and infill projects.</p>	<p>Inconsistent. The Project would introduce new facilities into an environment that is characterized by rural development and agricultural uses. As proposed, appropriate landscaping and site design does not maintain the identity and character of the established neighborhoods such as the residential neighborhood on 78th Street E adjacent to the Project site.</p>
	<p>Policy CC-1.3. Create a sensitive interface between residential and non-residential areas through various measures such as setbacks, screening, vegetative buffering and shielded lighting.</p>	<p>Inconsistent. The Project would introduce new facilities into an environment that is characterized by rural development and agricultural uses. As proposed, appropriate buffering measures would not create a sensitive interface between residential and non-residential areas.</p>
	<p>Policy CC-1.6. Encourage industrial development projects which complement and contribute positively to the character of the community through sensitive site design, buffering from</p>	<p>Inconsistent. The Project would introduce new facilities into an environment that is characterized by rural development and agricultural uses. As proposed, appropriate site design and buffering does not contribute to the character of the community</p>

Plan	Goal/Policy	Consistency Determination
	<p>adjacent uses, and facilitation/acknowledgement of the pedestrian experience.</p>	<p>and the Project would contrast with the existing environment. The Project, as proposed, would not have sensitive site design in that it blocks the view corridor of Van Lierop Park.</p> <p>The Project would include a pedestrian trail, allowing for increased access recreational resources for the area. However, the location of the trail is not connected to Van Lierop Park, which is part of the pedestrian experience and planned public access in the study area. Further, the trail would not facilitate a positive pedestrian user experience due to the proximity of adjacent high-vehicle and traffic truck areas and warehouse environment.</p>
	<p>Goal CC-2. Puyallup’s built environment is characterized by high-quality urban design that accommodates a mix of compatible residential, commercial and light industrial uses.</p>	<p>Inconsistent. The Project, by its nature as an approximately 2.6 million square foot warehouse development, would be a single use type of development and does not include a mix of compatible residential, commercial, and light industrial uses. Further, the Applicant has not provided design plans, but based on similar proposals of this size and type, the size, scale and massing of warehouse facilities typically do not encompass high-quality urban design, but rather design focused efficiency and function.</p>
	<p>Policy CC-2.1. Adopt urban design principles that recognize the unique characteristics of different types of development, including single-family, multi-family, mixed-use, and various types and sizes of commercial and industrial development.</p>	<p>Inconclusive. The overall pattern of development and use of the land is inconsistent with some of the City of Puyallup’s future land uses. Future land use designations identified in the City of Puyallup Comprehensive Plan include LM/W, B/IP, RBR and AOC. The Project would be inconsistent with the RBR designated areas and may be inconsistent with the B/IP designation, which is implemented by the Business Park zone, and therefore uses proposed and could largely be non-conforming once annexed to the City in large areas of land in the city’s UGA. The Project would be inconsistent with the AOC designation as the proposed Project is not retail commercial development. The Project may be consistent with LM/W.</p>
	<p>Policy CC-2.2. Encourage building design that creates distinctive places in the community.</p>	<p>Inconsistent. The Project is proposing development of seven warehouses, each varying in size from approximately 190,000 SF to 490,000 SF. The Applicant has not provided design plans, but</p>

Plan	Goal/Policy	Consistency Determination
		based on similar proposals of this size and type, the size, scale, and massing of warehouse facilities typically do not encompass high-quality urban design, but rather design focused efficiency and function. Further, the Project would be for use by businesses occupants and employees, which would not create a distinctive place for community members.
	Goal CC-3. Natural landforms, vegetation, and scenic areas that contribute to the City’s identity and visually define the community, its neighborhoods and districts are preserved.	Inconsistent. The Project proposes construction of Building F, which would interfere with the Van Lierop Park’s view corridor of Mount Rainier. Additionally, the Project would interfere with the viewshed of Mount Rainier from viewer groups and residents to the north of the Project site, including those on the nearby Riverwalk Trail and members of the public using roadways, sidewalks, and surrounding businesses.
	Policy CC-3.1. Encourage development to consolidate on-site landscape areas to be large enough to balance the scale of development.	Inconsistent. The Project would introduce new warehouse facilities into an environment that is characterized by rural development and agricultural uses. As proposed, on-site landscaping would not be large enough to balance the scale of the development.
	Policy CC-3.2. To the greatest extent feasible, preserve significant trees and mature vegetation.	Inconclusive. The Project site includes lands currently used for agriculture and no identified significant trees or mature vegetation exists on site.
	Policy CC-3.4. Maximize canopy coverage throughout the City to create comfortable pedestrian environments, provide stormwater benefits and mitigate microclimate impacts.	Inconsistent. The Project does not propose canopy coverage, especially along the pedestrian trail, which would greatly benefit trail users.
	Policy CC-4.2. Establish and maintain attractive landscaped gateways at entry points and key corridors into the City.	Inconsistent. As proposed, the Project does not include landscaped gateways along corridors of the eastern boundaries of the City.
	Policy CC-4.5. Allow the use of shared driveways in both commercial and residential zones to reduce curb-cuts and enhance pedestrian accessibility.	Inconsistent. The Project would be developed on contiguously owned parcels as one development. The Project would create driveways that would accommodate the approximately 8,724 trips per day (1,482 heavy-duty vehicles and 7,242 passenger cars and light-duty trucks) and would not be shared driveways.
	Policy CC-7.8. Work cooperatively with other jurisdictions, agencies, organizations, and property owners, specifically	Inconsistent. The Project is in the UGA of the City in the unincorporated County and involves cooperation of both

Plan	Goal/Policy	Consistency Determination
	including local Tribal entities and the Department of Archeology and Historic Preservation, to identify and preserve historic resources.	jurisdictions through the environmental review and permitting process. The Project is also subject to RCW 27.44 Indian Graves and Records, and RCW 27.53 Archaeological Sites and Resources and is required to comply with these regulations. The Puyallup Tribe of Indians and the Muckleshoot Indian Tribe have been contacted. For more information, see Section 4.12, Cultural Resources.
	Policy CC-7.9. Ensure that the potential for the existence of archeological sites is considered during development of new construction projects.	Consistent. The potential for existing archaeological sites is being considered through subsurface surveys, testing, and documentation. For more information, see Section 4.12, Cultural Resources.
	Policy CC-7.10. Based on local resource identification, conduct site-specific cultural resource assessments to ensure cultural artifacts are protected.	Consistent. A compliance-level architectural survey would be conducted, findings would be recorded and evaluated for their eligibility for listing in federal, state, and local registers. For more information, see Section 4.12, Cultural Resources.
	Goal CC-11. Citizens receive minimal exposure to the harmful physiological and psychological effects of excessive noise.	<p>Inconclusive. During construction, noise emissions would be minimized through best practices, such as muffling equipment, keeping equipment in good repair, and scheduling activities that occur closest to noise-sensitive parcels for midday rather than early morning.</p> <p>During operation, the various types of uses that could occur within the warehouses could emit noise at differing levels. Long-term operation noise from future land uses on the Project site can be mitigated through design and configuration of the warehouse campus (see Section 4.13, Noise).</p>
	Policy CC-11.1. Enforce regulations to control excessive, repetitive or continuous noises within its practical and legal abilities.	Inconclusive. During operation, there could be various types of uses that could occur within the warehouses. Land uses that employ manufacturing processes or any other known or anticipated operational noises that would emanate frequent, repetitive, or continuous noise that would otherwise unreasonably disturb or interfere with the peace, comfort, and repose of residential occupants and/or users of public parks in the direct vicinity would be permitted (see Section 4.13, Noise).

Plan	Goal/Policy	Consistency Determination
<p>City of Puyallup Shoreline Management Program</p>	<p>Policy 2(I). In securing shoreline locations for commercial or industrial use, preference should be given first to water-dependent uses, then to water-related and enjoyment uses.</p>	<p>Inconsistent. The Project is a development proposal and would not include buildings or construction within the shoreline jurisdiction, including the proposed pedestrian trail. The Project is not a water-dependent, water-related, or enjoyment use. The Proposed Project is providing public access but not in the shoreline environment.</p>
	<p>Policy 2(II). Commercial and industrial development should not result in a net loss of shoreline ecological functions or have an adverse impact to other shoreline uses, resources and values such as recreation and public access.</p>	<p>Consistent. The Project would be required to comply with the policies in the City and Pierce County Shoreline Master Programs, which are in place to ensure achievement of no net loss of ecological functions of the shoreline. This will be reviewed during the shoreline permitting process for the Project. There are currently no recreation opportunities or public access to the shoreline of the Puyallup River from the Project site. The Project does not propose buildings within the shoreline jurisdiction. The Project proposes the construction of a trail outside of the shoreline jurisdiction and therefore would not result in a loss of shoreline ecological functions or have an adverse impact to other shoreline uses.</p>
	<p>Policy 2(III). Restoration of impaired shoreline ecological functions and processes should be encouraged as part of commercial and industrial development.</p>	<p>Inconsistent. The Project is a development proposal and would not include buildings or construction within the shoreline jurisdiction, including the proposed pedestrian trail. The existing shoreline ecological functions of the portion of the Puyallup River shoreline jurisdiction within which the Project is located is currently impaired. The Project does not include restoration of impaired shoreline ecological functions and processes as part of its proposal. The Project would not contribute to shoreline restoration and would not comply with this policy.</p>
	<p>Policy 2(V). Commercial and industrial development should be required to provide physical or visual access to the shoreline or other opportunities for the public to enjoy shorelines of statewide significance whenever possible, provided such access is commensurate and proportional to development impacts, does not cause significant ecological impact, interfere with operations, or create risk to public safety.</p>	<p>Inconsistent. The Project is not proposing construction within the shoreline. The Project would provide a pedestrian trail on site, allowing connection to existing regional trails that are within the Puyallup River shoreline jurisdiction, but the pedestrian trail itself would not provide physical or visual access to the shoreline.</p>

Plan	Goal/Policy	Consistency Determination
	<p>Policy 2.1(I). Establish a public access system that capitalizes on Puyallup’s unique and varied shorelines with a combination of vistas, view areas, view corridors, scenic drives, trails, hiking paths, and bike paths that connect to and along the City’s shorelines to the maximum extent feasible.</p>	<p>Inconsistent. The Project would not contribute to the public access system, as the proposed pedestrian trail is largely on the edges of the proposed Project and is not visually or physically connected to the shoreline.</p>
	<p>Policy 2.1(III). Public access improvements should be established to provide recreational opportunities along the city’s shoreline areas.</p>	<p>Inconsistent. The Project would not contribute to public access improvements for recreational opportunities along the City’s shoreline areas. The proposed pedestrian trail is largely on the edges of the proposed Project and is not visually or physically connected to the shoreline.</p>
	<p>Policy 3.1(VII). Public access shall consist of a dedication of land or a physical improvement in the form of a walkway, trail bikeway, corridor, viewpoint, park, or other area serving as a means of view and/or physical approach to the shoreline and may include informational kiosks. Public access sites shall be connected directly to the nearest public street or public ROW and shall include improvements that conform to the requirements of the Americans with Disabilities Act (ADA).</p>	<p>Inconsistent. The Project would not contribute to means of view and/or physical approach to the shoreline. The proposed pedestrian trail is largely on the edges of the proposed Project and is not visually or physically connected to the shoreline.</p>
<p>City of Puyallup PROS Plan</p>	<p>Policy 2.3. Promote the development of trails for bicycle and pedestrian recreational and commuter use, linking community activity areas and focusing on areas suited to interpretive activities and facilities.</p>	<p>Inconsistent. The Project proposes an on-site pedestrian trail as part of the development; the trail would not contribute to the broad range of park and recreation activities as the trail would not be conducive to those uses given that it is largely through, and on the edges of, the warehouse and truck activity. Such trail development cannot be determined as promoting recreation development consistent with the shoreline policies substantially.</p>
	<p>Policy 2.4. Provide a visual connection to the Puyallup River and physical access where appropriate through the Riverwalk Trail, and opportunities for fishing and low-impact access through the trails system.</p>	<p>Inconsistent. The Project would not contribute to the visual connection to the Puyallup River, as the proposed pedestrian trail is largely on the edges of the proposed Project and is not visually or physically connected to the shoreline.</p>

Considering City policies, the Project would be inconsistent with the City's future land use designations, and would conflict with interjurisdictional collaboration in planning for annexation areas and future needs (Goal LU-8). The Project would also be inconsistent with policies that require complementing and integration with existing community character, as it would introduce new facilities into a built environment that is characterized by rural development and agricultural uses (City of Puyallup Comprehensive Plan, Policies CC-1.2 and 1.3). The Project also does not include restoration of impaired shoreline ecological functions and processes as part of its proposal (Puyallup SMP Policy 2(III)).

Based on these land use consistency considerations, the Project would cause less than significant impacts with mitigation applied. Mitigation measures LU-1, LU-2, LU-3, SW-6, and SW-7 would reduce impacts to the extent they are fully implemented by the permitting agency in future land use approvals for the Project. Mitigation measure LU-4 would reduce impacts to the loss of prime farmland soil the extent feasible. See Section 4.2.5 for a discussion of mitigation measures SW-6 and SW-7.

- **LU-1: Development limits on city Comprehensive Plan designation areas.** During building permit review and prior to design approval, the Applicant should provide a revised site plan that limits development to areas designated as Auto-Oriented Commercial, B/IP, and LM/W as shown on the City's Comprehensive Plan future land use map only; any future development permit applications would not construct or develop on lands designated RBR in the city Comprehensive Plan. This could result in Building C being removed and Buildings A and E being shifted, relocated, redesigned, and/or reduced in size. Eliminating development from areas designated RBR on the CPCP map would be consistent with the City's FLUM, which was developed in cooperation with County policy priorities to preserve agricultural land.
- **LU-2: Consider a broader mix of uses for the Project.** In determining Project end uses, consider a broader mix of uses other than just warehousing, in order to support the policy objectives around promoting both small and large businesses and to support diverse employment opportunities. This would be consistent with Pierce County Comprehensive Plan Policies LU-46.1 and LU-47.11, and City of Puyallup Comprehensive Plan Policy LU-21.
- **LU-3. Consider the compatibility with surrounding land uses.** To maintain community character and a connection with the surrounding community and built environment, consider harmonizing development features with adjacent land uses, shoreline, and critical areas. This would be consistent with Pierce County Comprehensive Plan Policies CC-1.2 and 1.3 and Puyallup SMP Policy 2(III).
- **LU-4 Conservation Easement:** The Applicant should voluntarily place a conservation easement on areas of the Project site that are currently identified as planned for open space uses. This would be consistent with the Pierce County Alderton-McMillin Community Plan's desired conditions to "maintain the rural character of the community into the future" (A-25) and with the CPCP Policy LU-9.2, which calls for using conservation incentives for preservation of agricultural lands as part of an urban growth strategy and the Project site being located within a mapped Open Space Corridor network (Pierce County Comprehensive Plan Goal LU-115, Goal LU-119, Goal PR-21 and Policy PR-21.3).

Alternative 1 – Rail Transport

Construction Impacts

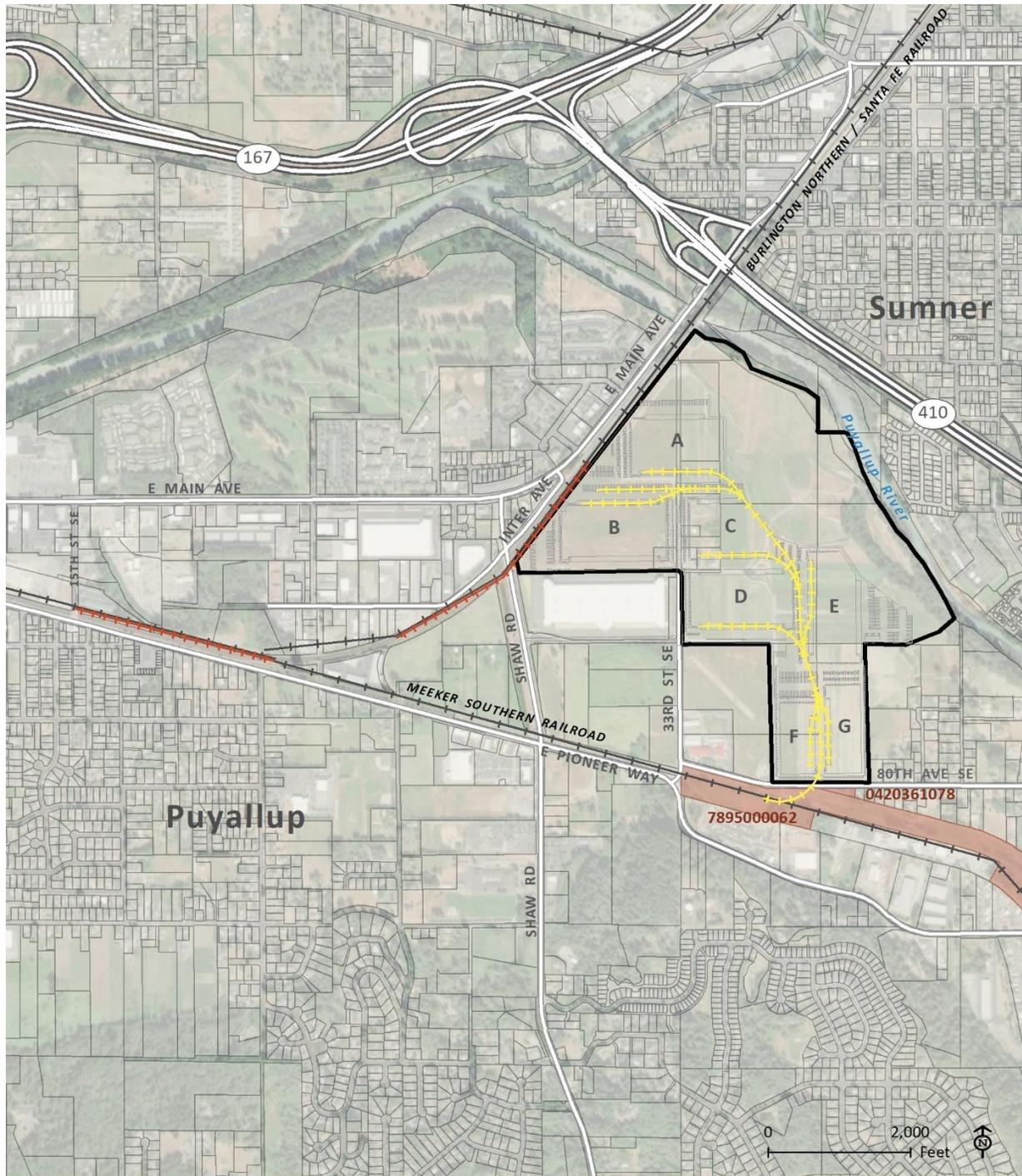
Mitigated Significant Impact. The construction impacts associated with Alternative 1 would be similar to those described for the proposed Project in that the Project would result in temporary environmental impacts within the Project site, as identified and addressed in sections of this EIS (Section 4.1, Earth Resources mitigation measures ER-1 through ER-10; Section 4.5, Land Use mitigation measures LU-1 through LU-4; Section 4.6, Recreation mitigation measures REC-1 through REC-3; Section 4.7, Aesthetics mitigation measure AES-1; Section 4.10, Health and Safety mitigation measures HS-1 through HS-5; and Section 4.13, Noise mitigation measures N-1 and N-2).

Additional impacts for Alternative 1 would be associated with the extension of the existing rail line outside of the Project site on a County-owned parcel and County ROW (Figure 4-44). Construction within the County ROW would require a construction guarantee prior to approval of the site development and ROW permits for the Project (Title 17A.20.030 PCC). The County-owned parcel (Parcel No. 0420361078) is zoned Park and Recreation, Rural 10 (R10), and is in a “right-of-way needs” area. This means that the County has set this land aside in the instance that it is needed for future ROW development; other development in this specific area is not allowed. The Applicant would be required to consult with the Pierce County Planning and Public Works Department prior to submitting a permit for construction to discuss the Project in the context of zoning constraints. Construction of both extensions of the track from the BNSF mainline/Meeker Southern interchange would not impact land use, as construction is anticipated to occur within the BNSF ROW.

Operations Impacts

Mitigated Significant Impact. The operations impacts associated with Alternative 1 would be similar to those described for the proposed Project in that they would be consistent with County zoning and future land use designations, but inconsistent with the City’s future land use designations. Additionally, during operations, Alternative 1 would include operation of a rail line off-site, across County ROW and a County-owned parcel. Extension of the rail line outside of the Project site would be on a County-owned parcel and in the County ROW. Alternative 1 has the potential to interfere with existing recreation land uses, like the Foothills National Recreation Trail and the East Puyallup Trailhead and Trail, as well as planned trails and recreation in the area. The PROS Plan identifies a priority to grow the regional trail system by connecting regional and connector trails in Pierce County. Alternative 1 would interfere with planned land uses in the Project site and with policy that calls for connectivity through systems of trails that link communities and parks (Pierce County Parks and Recreation Element, Goals PR-10, PR-17, and PR 17.1). Therefore, Alternative 1 would cause a significant environmental impact due to conflict with land use plans, policies, or regulations pertaining to non-conformance of future land use designations and planned land uses laid out in City and County planning documents.

Based on these considerations, operation of Alternative 1 would cause significant environmental impacts due to conflict with land use plans, policies, or regulations pertaining to non-conformance of future land use designations. Mitigation measures LU-1 through LU-4 would reduce these impacts to the extent feasible.



- | | |
|---|------------------------|
| —+— Existing Railroad | ▭ Project Site |
| —+— Site Proposed Rail Line | ■ Impacted Parcel |
| —+— Proposed BNSF Mainline/
Meeker Southern Interchange Extensions | □ Pierce County Parcel |

Figure 4-44. Land Use Parcels Impacted by the Proposed Rail Line

Alternative 2 – Reduced Intensity Alternative

Alternative 2 considers the potential impacts that would result if the mitigation measures that reduce the site footprint of the facility (AES-2, LU-1, REC-1, and SW-4) as outlined in this EIS for the proposed Project) were adopted by the Applicant. As noted below, Alternative 2 would still require Project implementation mitigation measures to reduce land use impacts.

Construction Impacts

Mitigated Significant Impact. Mitigation measure LU-1 would result in Warehouse C being eliminated and Warehouses A, G, E, and F being reduced in size. Therefore, compared to the proposed Project, Alternative 2 would have a reduced footprint and construction could be expected to be at a smaller scale (Figure 3-4). However, temporary land-use-related environmental impacts analogous to the proposed Project would occur, as identified and addressed in sections of this EIS (Section 4.1 Earth Resources, mitigation measures ER-1 through ER-10; Section 4.5 Land Use, mitigation measures LU-2 through LU-4; Section 4.6 Aesthetics, mitigation measure AES-1; Section 4.7 Recreation, mitigation measures REC-2 through REC-3; Section 4.10 Health and Safety, mitigation measures HS-1 through HS-5; and Section 4.13 Noise, mitigation measures N-1 and N-2).

Operations Impacts

Mitigated Significant Impact. Mitigation measure LU-1 would result in Warehouse C being eliminated and Warehouses A, G, E, and F being reduced in size. Elimination of land development in areas of the Project site that the City and County previously agreed to set aside as agriculture and/or open space would be more consistent with both jurisdictional Comprehensive Plans. Alternative 2 may conflict with both County and City land use plans, policies, or regulations pertaining to non-conformance of future land uses if established inconsistent with both jurisdiction policies around broad uses and compatibility with the local environment. Mitigation measures LU-2 and LU-3 would reduce impacts to the extent feasible.