

From: [Jeffrey Delapena](#)
To: [Cnty 2025 Comp Plan](#); [Angie Merrill](#)
Cc: [Oliver Orijako](#); [Jose Alvarez](#)
Subject: RE: Comprehensive Plan Update Comments
Date: Friday, October 3, 2025 4:55:49 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Angie,

Thank you for your feedback on behalf of the City of La Center related to the Sept. 30th Community Workshop regarding the Agricultural Lands Study.

I have forwarded your comments to Staff and will enter these into the Comprehensive Plan Index of Record.



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



NOTICE OF PUBLIC DISCLOSURE: This e-mail account is public domain. Any correspondence from or to this e-mail account may be a public record. Accordingly, this email, in whole or in part may be subject to disclosure pursuant to RCW 42.56, regardless of any claim of confidentiality or privilege asserted by an external party.

From: Clark County <webteam@clark.wa.gov>
Sent: Friday, October 3, 2025 4:49 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Subject: Comprehensive Plan Update Comments

EXTERNAL: This email originated from outside of Clark County. Do not click links or open attachments unless you recognize the sender and know the content is safe.



Submitted on Fri, 10/03/2025 - 4:48 PM

First Name

Angie

Last Name

Merrill

Email Address

amerrill@ci.lacenter.wa.us

Phone Number

[3602633654](tel:3602633654)

Organization/Agency Name

City of La Center

Address

Along the 4th Street Corridor in LaCenter WA

LaCenter, Washington. 98629

Message Subject

2025 Clark County Agricultural Lands Study Open House

Parcel Number

209749000, 209693000, 209694000, 244244000, 211265000, 211208005, 211208000, 211287000

Comments

On behalf of the City of La Center, I would like to submit the following comments for the City and the parcels that are being requested to be de-designated and answer the questions asked at the 2025 Clark County Agricultural Lands Study Open House held on September 30. 2025.

1. I believe the most important WAC criteria to support agricultural that is sustainable and commercially viable for the long-term in Clark County is the following:

a. To be truly sustainable and commercially viable for the long-term in Clark County, the lands should be located in a very rural setting. Lands that are abutting growing cities and urban growth, as manifested by development at the I-5/La Center Road junction, lands where non-agricultural businesses are located are not consistent with a rural setting. The nine (9) parcels that the City of La Center is requesting to be brought into the city are parcels that have less than 20 acres that

can be used for agricultural purposes. The parcels are being used as current businesses, such as a landscape business, semi-trucks parking on a parcel, and a large horse arena business. These the sites are encumbered by environmental constraints.

b. The City of La Center is not seeking to add lands to the Urban Growth Area (UGA) that are currently, or will be used for agricultural production. The properties proposed for inclusion within the UGA are not considered viable for agriculture due to existing commercial operations, which would render farming impractical should those businesses cease to operate. Additionally, factors such as steep slopes and environmental constraints further limit or eliminate the potential for agricultural use on these lands.

c. The parcels that La Center would like to bring into the city do not have long-term commercial significance for agriculture. The lands that have had industrial and commercial businesses located on them, such as semi-trucks parked on the lands for years, would make the soils very hard to farm and would be costly to clean-up. The properties have all undergone a study that has been determined that the lands do not have the growing capacity, productivity, soil composition, and condition of the on-site soils making the parcels no longer viable for agricultural uses.

d. With regards to intensity of nearby land uses, all properties are adjacent to I-5 and currently support commercial and industrial uses and are located nearby a large urban-scale gaming complex. Land on the east side of I- 5 is adjacent to a newer commercial development, an electrical substation, and a regional school bus transportation facility serving both Clark and Cowlitz County school districts. Major transportation infrastructure with a new I-5 crossing with off-ramps and roundabouts (on both sides of I-5) and a parallel Paradise Point Road bypass have been constructed in the past ten (10) years as well.

2. The maps shown at the open house do not accurately depict the on-ground-conditions, and there should not be additional indicators of agricultural production capability or agricultural commercial significance that should be included.

a. The mapping doesn't accurately depict the parcels that the City of La Center is requesting to be brought into the city. The maps do not show that the soils are not viable, they don't show the environmental constraints and commercial and industrial businesses located on the parcels

3. The lands included in the scenarios submitted by La Center to Clark County are not suitable as farmlands and do not affect food security, which is based on the premise that the land is now or will be used for food production. The properties have not been used for food production in over a decade. The proposed use of these parcels by the City of La Center is intended to facilitate job creation and affordable housing for the community.

4. The City of La Center has worked very hard in making the determination for the scenarios presented to Clark County for the 2025 Comprehensive Plan Update. The city has provided extensive visioning and public engagement processes with its Planning Commission, City Council, and community via open houses and tabling sessions, where consensus was agreed that additional job capacity at the proposed areas meets the city's vision. Clark County's own Vacant Buildable Lands Model mapping shows nearly all the commercial and industrial land as either vacant critical or underutilized critical, thus making it exceedingly difficult to attract employment growth to these properties. The proposed expansion has some of the flattest and least encumbered land that exists in the area. Nearby is a regional school bus transportation facility and electrical substation.



© 2025 Clark County Washington