

From: [Jeffrey Delapena](#)
To: [Cnty 2025 Comp Plan](#); [Angie Merrill](#)
Cc: [Tracy Coleman](#); [Oliver Orjiako](#); [Jose Alvarez](#); [Jenna Kay](#)
Subject: FW: Comprehensive Plan EIS - Comments
Date: Wednesday, November 26, 2025 2:23:48 PM
Attachments: [Outlook-0edibm1v.png](#)
[FINAL DEIS Comments Letter-11.18.2025 .pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Angie,

Thank you for submitting the City of La Center's feedback related to the Draft Environmental Impact Statement for the 2025 Comprehensive Plan Update.

I have forwarded these comments to additional Staff and will enter them into the Index of Record.



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



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From: Angie Merrill <amerrill@ci.lacenter.wa.us>
Sent: Wednesday, November 26, 2025 2:21 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Cc: Tracy Coleman <tcoleman@ci.lacenter.wa.us>
Subject: Comprehensive Plan EIS - Comments

You don't often get email from amerrill@ci.lacenter.wa.us. [Learn why this is important](#)

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.

Please accept the attached comments for the Comprehensive Plan EIS from the City of La Center.

Thank you,

Angie Merrill

Community Development

Land Use Planner

210 E 4th Street La Center, WA 98629

360.263.3654

amerrill@ci.lacenter.wa.us





Clark County
PO Box 9810
Vancouver, WA 98666-9810
Attn: Oliver Orjiako, Director of Community Planning and Responsible SEPA Official

Re: Comments on the Draft Environmental Impact Statement (DEIS) for the
Comprehensive Growth Management Plans of Clark County, Battle Ground, Camas,
La Center, Ridgefield, Washougal, Woodland and Yacolt (October 1, 2025)

Mr. Orjiako,

The City of La Center appreciates Clark County's work on the DEIS and the opportunity to provide comment on the content of it. We do so in the spirit of clarification, collaboration, and cooperation that we hope leads to a preferred alternative that reflects the City of La Center's vision and plan for the future. With the DEIS running 250+ pages in length, we cannot comment on all elements in detail or equally. Instead, we offer some general comments on the focus of the DEIS and the methodology when it comes to the housing and jobs numbers generated in the three (3) alternatives.

General Comments

The first observation we make is the peculiarity with the sheer volume of information related to soils that is contained within the DEIS. There is no fewer than 25 pages of text and tables discussing the qualities of soils relative to corrosivity to concrete and steel, limitations of dwellings with and without basements, limitations to small commercial construction, soils with drainage issues, and capabilities for agricultural use. The stated purpose of this analysis is to ask what soils underlie the areas proposed for future development patterns (i.e., UGA expansion/reduction, city boundary expansion) and to what extent those soils might support or constrain future development. It also recognizes conversion of rural resource lands to urban uses as an important land use issue. It further states that GMA requires local jurisdictions to identify and protect agricultural and timber lands of long-term commercial significance. We believe the latter purpose of protecting agricultural lands to be an outsized and overriding theme of this Comprehensive Plan update.



In each of the alternatives, there is a rundown, by acreage, of the soil qualities that would be impacted. In the text and tables, all the soil qualities are listed, including if good or prime agricultural soils are impacted. We are left wondering why so much attention is paid to soils in the DEIS. If not for the recent Agricultural Resource Lands Study, published after the release of the DEIS, with findings that support no changes to any of the current Agricultural lands designations, we would not have the same questions surrounding the reason for so much emphasis on detailed soils information.

Questions About Methodology

With respect to identifying significant environmental impacts on population, housing and land use patterns, the DEIS relies on the County's Vacant Buildable Lands Model (VBLM) and assumptions to generate the capacity of available and buildable land to accommodate the projected population growth and, therefore, housing and jobs numbers. With any of the resultant housing or jobs numbers, there appears to be no explanation as to the methodology used nor are there any appendices that can be reviewed to see how any calculations were arrived at. The VBLM generated housing and jobs numbers feel like they are products of a black box that are difficult to explain in plain terms.

Alternatives

Under Alternative 1, Urban Growth Areas (UGAs) would not be expanded, which means keeping the current boundary would require upzoning or increased densities in some areas. Given that La Center's land supply contains a significant amount of critical areas and most of the city is served by constrained transportation infrastructure (the La Center Road bridge), it is not feasible to upzone across the entire city, or UGA for that matter.

Alternative 1 could accommodate 96 percent of the population, countywide, but would result in 3,860 housing units being shy of the target number of housing units. For La Center, Alternative 1 results in a deficit of 46 jobs from the target number of 2,142. As a smaller city isolated from the I-5 corridor, La Center is focused on providing as many economic development and job opportunities as possible so that it has the tax base to provide city services to its businesses and residents. Planning with a jobs deficit, albeit small, is not of interest to the City, thus the reason for UGA expansions, especially toward the I-5 junction where large-scale urban development has occurred and continues to occur.



Under Alternative 2, there are ten (10) properties that reflect expansions of the UGA. There are two areas – one is on the east side of La Center Road/I-5 junction and the other is west of I-5 and south of the Cowlitz tribal-owned land – that constitutes the UGA expansion. There is also a single lot just south of the existing UGA on the east side of I-5.

The area east of the junction is next to major infrastructure improvements along the La Center Road and I-5 junction, which has urban development immediately west and south in the form of municipal waterworks, a regional school bus transportation facility, and commercial development right off La Center Road and Paradise Park Road. The area west of I-5 contains six (6) properties that have been used for various light industrial uses in the recent past.

Although Alternative 2 accurately describes the employment land UGA expansion area west of I-5 south and south of the urbanized tribal owned land, it contains an error because it does not mention the UGA expansion north of the urbanized area of the La Center junction. The maps for Alternative 2 show the expansion areas, however, the area north of the La Center Road/I-5 junctions is planned for mixed use of employment and housing and not exclusively commercial.

In Alternative 2, the DEIS indicates that La Center would add 120 acres to the UGA for commercial and industrial use and that would generate a projected housing surplus of 178 units. One correction to make is that the acreage is 113 acres. The DEIS reports that Alternative 2 would generate a job capacity of 3,011 jobs, which is 869 over the job target of 2,142. The City does not believe that the job numbers described in the DEIS accurately reflect conditions on the ground in the City of La Center, due to errors in the assumptions of the VBLM—issues we have described many times in our comments to Clark County—particularly regarding critical areas and market factor assumptions. The City calculates a jobs deficit without the proposed expansions of Alternative 2.

Resource Lands

Page 116 of the DEIS comments on the identification and protection of resource lands, including agricultural, forest and mineral resources. There is also a requirement to protect these areas from adjacent incompatible land uses that would interfere with their long-term commercial significance. The designation of long-term commercial significance for



agricultural land follows WAC 365-190-050, which contains several mandatory and discretionary criteria. The DEIS states that prior to expansion of the urban growth area, counties and cities must first review the natural resource lands designation and conclude the lands no longer meet the designation criteria for resource lands of long-term commercial significance.

Although not part of the DEIS, on November 4, 2025, the County produced an Agricultural Resource Lands Study that examined the agriculturally designated lands within Clark County to determine whether the designations are consistent with the WAC. We agree the study needed to be done, and we had hoped to be more involved as key stakeholders. While the County’s consultant identified only three criteria—soil classification, tax status, and predominant parcel size—to be considered in the final evaluation phase, we strenuously disagree with discounting other criteria, such as the intensity of nearby land uses, water rights, individual parcel soil classifications, the history of land development permits issued nearby, and land-use settlement patterns and their compatibility with agricultural practices. Had the County’s consultant conferred with anyone other than Agricultural Advisory Committee members, farmers, and members of the Friends of Clark County, they would have received different information and insight regarding the effect of these other discretionary criteria on the designation of agricultural land of long-term commercial significance. We are disappointed and dismayed that the County did not reach out to the City for a conversation during the time the consultant was working on this study.

Specific DEIS Section Comments

For specific comments related to Sections 1.0, 2.0, 3.8, and 3.10, we have attached a table of comments for your ease of readability and use.

We offer our comments and the attachment to clarify or correct the City preferred alternative, as expressed by Alternative 2. We also provide general comments and criticisms in hopes that certain elements of DEIS are further explained as the County initiates a process to narrow the alternatives down to a preferred alternative for the Final EIS.



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210 East Fourth Street • La Center, WA 98629

Sincerely,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke that extends to the right.

Thomas Strobehn, Mayor
City of La Center

Cc: La Center City Council
Clark County Council



DEIS Section	La Center Response/Comment
<p>Section 1.0 Introduction and Summary. Table 1. <i>Commercial/industrial/business park zones – percent of land assumed for infrastructure: 25%</i></p> <p><i>Percentage of potentially critical land is not critical and will develop: 50%</i></p>	<p>La Center assumes that infrastructure needs for all zones (residential, mixed use, and commercial/employment) are similar due to utility, roadways, and landscaping requirements. Therefore, the infrastructure deduction should be 31.5% across all zones in La Center.</p> <p>La Center assumes that potentially critical land in its targeted rezones and expansion areas are grossly encumbered by steep slopes, wetlands, and riparian buffers. New CAO requirements require extensive buffers and protections, which will encumber these sites further. Therefore, in La Center, this assumption should be 100% for its targeted rezones and expansion areas.</p>
<p>Section 1.0 Introduction and Summary. Table 3. Alternative 2. <i>“Expansion of UGA to the south to include employment land zoning changes within UGA to increase density.”</i></p> <p><i>Acres = 1,845 + 121</i></p>	<p>Alternative 2 also includes expansion of UGA to the north of the Junction Plan for employment land.</p> <p>Alternative 2 should only be adding 113 acres, not 121.</p>
<p>Section 1.0 Introduction and Summary. Table 3. Alternative 3. <i>“Same area of expansion as Alt. 2 but for a mix of uses both employment and residential. Less upzoning in existing UGA.”</i></p> <p><i>Acres = 1,845 + 195</i></p>	<p>Alternative 3 should specify mix of uses for UGA expansion north of Junction Plan.</p> <p>Verify that Alternative 3 includes 113 acres of City-supported UGA expansion, plus the additional site-specific requests.</p>
<p>Section 2.2 Alternative 2</p> <ul style="list-style-type: none"> <i>“La Center – Expansion of UGA to the south to include employment land and zoning changes within UGA to increase density.”</i> 	<p>Similar to Section 1, please include expansion of UGA to the north of the Junction Plan for employment land.</p>
<p>Section 2.3 Alternative 3</p> <ul style="list-style-type: none"> <i>“Same area of expansion as Alt. 2 but for a mix of uses both employment and residential. Less upzoning in existing UGA.”</i> 	<p>Similar to Section 1, please specify mix of uses for UGA expansion north of Junction Plan.</p>
<p>Section 3.8.2.1 Significant Environmental Impacts – No Action</p>	<p>Parcels 209704000, 209746000, and 209705000 are under trust for the Cowlitz Indian Tribe.</p>



DEIS Section	La Center Response/Comment
<p><i>Table 71. Housing Targets within UGAs vs. Projected Capacity, Alternative 1</i></p>	<p>These properties are zoned Junction Plan, which allow a mix of housing and jobs. However, the tribe is not subject to local land use regulations, therefore, these properties should be excluded from the 2023 VBLM capacity numbers. <i>This applies to Alternatives 2 and 3.</i></p>
<p>Section 3.8.2.1 Significant Environmental Impacts – No Action <i>Table 72. Job Targets within UGAs vs. Projected Capacity, Alternative 1</i></p>	<p>Parcels 2019704000, 209746000, 209705000, and 211230000 are under trust for the Cowlitz Indian Tribe. These properties are zoned Junction Plan, which allow a mix of housing and jobs. However, the tribe is not subject to local land use regulations, therefore, these properties should be excluded from the 2023 VBLM capacity numbers. <i>This applies to Alternatives 2 and 3.</i></p>
<p>Section 3.8.2.2 Impact of Alternative 2 <i>Table 74. Housing Targets within UGAs vs. Projected Capacity, Alternative 2</i></p>	<p>Parcels 209704000, 209746000, and 209705000 are under trust for the Cowlitz Indian Tribe. These properties are zoned Junction Plan, which allow a mix of housing and jobs. However, the tribe is not subject to local land use regulations, therefore, these properties should be excluded from the 2023 VBLM capacity numbers. <i>This applies to Alternatives 1 and 3.</i></p> <p>La Center assumes that 100% of critical areas will not develop in the targeted rezones and expansion areas, therefore, the jobs generated by these lands should be much less than shown in the DEIS.</p> <p>La Center also adopted the Downtown and Timmen Landing subarea plans in June 2025. This has readjusted housing and jobs capacity in La Center, as provided by the City to the County in October 2024. Please consider the adoption of these plans and updated zones for the alternatives analysis.</p> <p>When combining reduction of capacity from Cowlitz Trust lands, accommodating the subarea plans, and 100% critical areas assumption, La</p>



DEIS Section	La Center Response/Comment
	Center’s projected employment capacity should be an approximate 159 jobs surplus.
<p>Section 3.8.2.2 Impact of Alternative 2 <i>Table 77. Job Targets within UGAs vs. Projected Capacity, Alternative 2</i></p>	<p>Parcels 209704000, 209746000, and 209705000 are under trust for the Cowlitz Indian Tribe. These properties are zoned Junction Plan, which allow a mix of housing and jobs. However, the tribe is not subject to local land use regulations, therefore, these properties should be excluded from the 2023 VBLM capacity numbers. <i>This applies to Alternatives 1 and 3.</i></p>
<p>Section 3.8.2.3 Impact of Alternative 3 <i>Table 80. Housing Targets within UGAs vs. Projected Capacity, Alternative 3</i></p>	<p>Parcels 209704000, 209746000, and 209705000 are under trust for the Cowlitz Indian Tribe. These properties are zoned Junction Plan, which allow a mix of housing and jobs. However, the tribe is not subject to local land use regulations, therefore, these properties should be excluded from the 2023 VBLM capacity numbers. <i>This applies to Alternatives 1 and 2.</i></p> <p>La Center assumes that 100% of critical areas will not develop in the targeted rezones and expansion areas, therefore, the housing units generated by these lands should be much less than shown in the DEIS.</p> <p>La Center also adopted the Downtown and Timmen Landing subarea plans in June 2025. This has readjusted housing and jobs capacity in La Center, as provided by the City to the County in October 2024. Please consider the adoption of these plans and updated zones for the alternatives analysis.</p> <p>When combining reduction of capacity from Cowlitz Trust lands, accommodating the subarea plans, and 100% critical areas assumption, La Center’s projected housing capacity should be an approximate 266 housing unit surplus (w/o accommodating additional site-specific requests beyond the alternative submitted by the City).</p>



DEIS Section	La Center Response/Comment
<p>Section 3.8.2.3 Impact of Alternative 3 <i>Table 83. Job Targets within UGAs vs. Projected Capacity, Alternative 3</i></p>	<p>Parcels 209704000, 209746000, 209705000, and 211230000 are under trust for the Cowlitz Indian Tribe. These properties are zoned Junction Plan, which allow a mix of housing and jobs. However, the tribe is not subject to local land use regulations, therefore, these properties should be excluded from the 2023 VBLM capacity numbers. <i>This applies to Alternatives 1 and 2.</i></p> <p>La Center assumes that 100% of critical areas will not develop in the targeted rezones and expansion areas, therefore, the jobs generated by these lands should be much less than shown in the DEIS.</p> <p>La Center also adopted the Downtown and Timmen Landing subarea plans in June 2025. This has readjusted housing and jobs capacity in La Center, as provided by the City to the County in October 2024. Please consider the adoption of these plans and updated zones for the alternatives analysis.</p> <p>When combining reduction of capacity from Cowlitz Trust lands, accommodating the subarea plans, and 100% critical areas assumption, La Center’s projected employment capacity should be an approximate 47 jobs surplus (w/o accommodating additional site-specific requests beyond the alternative submitted by the City).</p>
<p>Section 3.10.1.F Park and Recreation Facilities. <i>Table 100. Parkland Level of Service Standards and Status.</i></p> <p><i>“La Center (2017 PROS)”</i></p>	<p>La Center adopted its updated 2024 PROS last year. Please update the LOS criteria per the latest PROS.</p>
<p>Section 3.10. 1. J General Government. <i>City Government Facilities</i> <i>Table 101. City Government Facilities</i></p> <p><i>La Center</i></p>	<p>Add Public Works Operations Center, Community Center and Community Library to the list.</p>



DEIS Section	La Center Response/Comment
<p>Section 3.10.2.C Public Education. <i>Table 103. Needed School Facilities by District.</i> <i>“La Center SD. New Middle School.”</i></p>	<p>La Center Middle School has been built and is in operation. Please remove this facility from the list. Additionally, La Center School District has recently adopted its updated CFP, which includes updated facility needs and costs. Please update this list with the most recent LCSD CFP.</p>