

From: [Jeffrey Delapena](#)
To: [Daina McLean](#); [Oliver Orijiako](#); [Cnty 2025 Comp Plan](#)
Cc: [Tracy Coleman](#); [Angie Merrill](#); [Jose Alvarez](#); [Jenna Kay](#)
Subject: RE: Clark County Comprehensive Plan and DEIS Comments
Date: Monday, December 1, 2025 1:35:56 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Good day, Daina,

Thank you for this feedback related to the Draft Environmental Impact Statement and the 2025 Comprehensive Plan Update.

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



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



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From: Daina McLean <DMcLean@ci.lacenter.wa.us>
Sent: Sunday, November 30, 2025 4:47 PM
To: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Cc: Tracy Coleman <tcoleman@ci.lacenter.wa.us>; Angie Merrill <amerrill@ci.lacenter.wa.us>
Subject: Clark County Comprehensive Plan and DEIS Comments

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To the Clark County Comprehensive Plan decision makers:

Over two years (and more!) the City of La Center has conducted multiple meetings with its citizens and has heard that they want to retain their small town feel and, for the La Center Comprehensive Plan, they desire to maintain growth for jobs and housing density up at the I-5 junction - near current growth and a major transportation corridor. Thus, the City of La Center has submitted its chosen comprehensive plan scenario that was approved by the Planning Commissioners and City Council Members, with feedback from other citizens, to Clark County. The scenario provides for ongoing financial welfare of our city, meets the housing and job allocations of the state set forth for Clark County, and focuses our growth at the I-5 Junction. Please approve the City of La Center's chosen scenario.

Additionally, please follow the WAC guidance to allow for minor UGA expansion, as per the following:

Throughout the years, La Center has been provided a UGA (Urban Growth Area) up by the junction. Clark County should encourage those plans. There is a concern about impeding on agricultural lands, lands which we all know are very important. However,

- > There are 23,000 acres of Agricultural Designated land represented in the Clark County Agricultural study. Of that, La Center is asking for 113 acres along the I-5 Corridor to be de-designated for growth. This represents less than half a percent of the total land. Of those 113 acres (0.49%) requesting to be de-designated, only 23 acres (0.1% of all agricultural lands) are NOT restricted by wetlands, riparian buffers, slopes, etc.
- > According to USDA study conducted in 2024, US crop yield has grown by 2.5% annually over the last ten years and continues to improve due to science and technology. Thus the ask for 0.1% of agricultural lands should have minimal impact to agriculture.
- > For the few properties, if any, that have water rights, is it possible to transfer the rights to lands that are being used for agriculture?
- > The lands requesting to come into the city of La Center at the junction are not being used for agriculture (and have not been for years) and already have infrastructure suitable for businesses. The landowners have come to the City, asking to be part of La Center. Their lands have been in urban reserves for 30+ years. Meaning, the intent is for these lands to be brought into the UGA for development. Again, there is no farming on these lands. For examples:
 - > > See the Clark County Council tour materials, provided by the City of La Center.
 - > > Current Comprehensive Plan https://clark.wa.gov/sites/default/files/media/document/2024-06/comprehensiveplan_portrait_36x48.pdf

- La Center deserves similar opportunities for growth at our junction as its surrounding cities have done.
- The Agricultural land study by Clark County only focused on 3 elements (see WAC Criteria Considered for Final Evaluation, below). All elements should be reviewed in order to achieve an accurate conclusion and ensure the County follows its own guidelines. Please see the WAC items, in bold below, to identify the elements that pertain to the La Center scenario.
- Please see comments submitted earlier, as well: <https://websvc2.clark.wa.gov/CommunityPlanning/2025CompPlanUpdatea/37883328.pdf>

Additionally, the County has scrapped adding a second bridge from La Center to the freeway. This puts an additional burden on our community.

- Downtown La Center does not have the road capacity or infrastructure for dense growth. The existing infrastructure does not allow for multi-lane paths, extra turn lanes or vehicle travel lanes. The existing 4th street roundabout and single bridge from downtown La Center to the freeway are a bottleneck in the community.

The I-5 Junction at La Center has been growing. La Center should be enabled to grow along with it.

- While Ridgefield has been allowed to grow at Exit 14, and the area surrounding Exit 16 has grown 10 fold since 2015 due to the Cowlitz Indian Tribe (see photos, below), it seems, the City of La Center is not being allowed to grow at our own exit.
- La Center needs industrial and commercial growth. It needs revenue for roads, parks and other capital upkeep.
- The cardroom revenue was 70% of the city's total general revenue fund until 2016 when Ilani opened. Since then, the funds have decreased by 50%. La Center needs to be allowed to grow at the junction, adjacent to tribal land growth. This will enable us to provide jobs and sustainable revenue for the city. We deserve the opportunity to provide jobs for our residents within our own community.
- We are required to accommodate new jobs per state law. If Clark County does not de-designate 0.49% (or 0.1% "usable") of agricultural (AG) lands that are not used for agriculture, La Center will be unable to meet its job growth criteria. Yet, Clark County has stated in multiple meetings that they could send/give our allocations to other cities (i.e. Vancouver), how does that support the residents of La Center? Will Clark County then be willing to help pay for the infrastructure to keep the City going?
- Without job lands and the revenue stream generated, the City of La Center will continue to struggle to maintain roads, utilities, and essential infrastructure. A bedroom community does not make a vibrant financially healthy community.
- If the County approves the City of La Center Comprehensive Plan Scenario and expansion, they would:
 - No longer have to police those areas as it would be done by the City of La Center.
 - Improve the environment by using the city's waste water system, eliminating a need for septic tanks in those areas.
- The City of La Center needs job-supporting lands to ensure the long-term economic health and stability of our community.

Please help the citizens of Clark County and La Center by working together to enable growth to stay where it belongs, near the I-5 corridor, and retain agricultural lands in other areas. Also, to enable growth in the Urban Reserve that the County has already put aside as such. Please vote to de-designate 0.49% (0.1% of usable land) and approve the City of La Center's chosen Comprehensive Plan scenario.

Sincerely,
 Daina McLean
 Chair, Planning Commission
City of La Center
DMcLean@ci.lacenter.wa.us
<https://ci.lacenter.wa.us/>

Additional Resources and photos.

2007 Comprehensive plan
https://clark.wa.gov/sites/default/files/dept/files/community-planning/comprehensive-plan/Maps/2007%2B/LAC_Adopted_092507_32x32.pdf

Public Comments: <https://clark.wa.gov/community-planning/2025-update-public-comment>

WAC Criteria Carried Forward/Considered for Final Evaluation

(Per ECONorthwest Agricultural Resource Lands Study – November 2025) **N= Did not consider**

WAC Criteria	Criterion Language	Carried Forward (Y or N)
365-190-050(3)	Land is not already characterized by urban growth;	Y
(a)		Y
365-190-050 (3)(b)	Land is used or capable of being used for agricultural production;	N*
365-190-050(3)	Lands that are currently used for agricultural production and lands that are capable of such use must be evaluated for designation;	Y
(c) (i)		Y
365-190-050 (3) (c) (ii)	The availability of public facilities, including roads used in transporting agricultural products;	N
365-190-050(3)	Tax status, including whether lands are enrolled under the current use tax assessment under chapter 84.34 RCW and whether the optional public benefit rating system is used locally, and whether there is the ability to purchase or transfer land development rights;	Y
(c) (iii)		Y
365-190-050 (3) (c) (iv)	The availability of public services;	N
365-190-050 (3) (c) (v)	Relationship or proximity to urban growth areas;	N
365-190-050 (3) (c) (vi)	Predominant parcel size, which may include smaller parcels if contiguous with other agricultural resource lands;	N
365-190-050 (3) (c) (vii)	Land use settlement patterns and their compatibility with agricultural practices;	N
365-190-050 (3) (c) (viii)	Intensity of nearby land uses;	N
365-190-050 (3) (c) (viii)	History of land development permits issued nearby;	N

050 (3) (c) (ix)
365-190- Land values under alternative uses; and
050 (3) (c) (x)
365-190- Proximity to markets.
050 (3) (c) (xi)
365-190-050(4) Food Security

N
N
N
Y

* For a host of reasons detailed in the study, no determination was made for this criterion.

Here is the link to the AG Study <https://ci.lacenter.wa.us/wp-content/uploads/final-agricultural-lands-study-technical-report-2025.11.04-1.pdf>

PHOTOS

La Center Junction circa 2015



La Center Junction circa 2023



