From: Angie Merrill
To: Jeffrey Delapena
Cc: Oliver Orjiako; Jose Alvarez; Rebecca Messinger
Subject: RE: Exhibit for tonight"s hearing
Date: Thursday, October 1, 2026 11:59:36 AM
Attachments: image001.png
image003.png
image004.png
image005.png
image006.png
image007.png
Updated Testimony for CC Comp Plan Adoption Hearing.pdf

I added some additional information to my testimony for the hearing this evening based on the County/City meeting this morning. Is there anyway to swap out my submittal from this morning? If not, can you make this a new exhibit? Sorry for any confusion.

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

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From: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Sent: Thursday, October 1, 2026 10:37 AM
To: Angie Merrill <amerrill@ci.lacenter.wa.us>
Cc: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>
Subject: RE: Exhibit for tonight's hearing

Good day, Angie,

Thank you for submitting the City of La Center's testimony related to the 2025 Comprehensive Plan update ahead of tonight's Council Hearing

Confirming receipt from Community Planning. These will be added to the Comprehensive Plan Index of Record. I have also included Rebecca Messinger from the

Council's office as she will be coordinating the hearing.

Best,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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From: Angie Merrill <amerrill@ci.lacenter.wa.us>
Sent: Thursday, October 1, 2026 9:37 AM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Subject: Exhibit for tonight's hearing

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.

Good morning,

Can you please make the attached testimony an exhibit for the hearing Comp Plan Hearing tonight 10/1/2026? I have additional information that I will not be reading this evening.

Thank you,

Angie Merrill
Community Development
Land Use Planner
210 E 4th Street La Center, WA 98629

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Clark County Councilor's

1300 Franklin Street

Vancouver, WA 98660

October 1, 2026

Clark County Council. Thank you for the opportunity to speak on behalf of the City of La Center as you consider adoption of the Comprehensive Plan.

I would like to focus on La Center's economic future and how we can grow while protecting the things that are important to Clark County.

La Center has some unique challenges when it comes to growth. Much of the land surrounding our community is constrained by steep slopes, wetlands, habitat, and other environmentally sensitive areas. This limits where we can realistically grow.

That's why the areas we have requested along I-5, near the interchange and the Ilani Casino, are so important. This is where transportation and infrastructure can support future commercial and industrial development while allowing us to protect the small-town character of our downtown and community.

There is also a long history behind these areas being considered for future growth. Since 2007, these properties have been identified as Urban Reserve areas for the future expansion of La Center for employment. The City, County, and others have made significant investments in roads, utilities, and development around the I-5 interchange.

These areas are next to or near tribal trust lands that are expected to be developed. As development occurs, the area will become increasingly urban in character, with more traffic, noise, and other activities that are not compatible with long-term agricultural use.

For La Center, this is about more than adding land. It is about creating family-wage jobs and building a strong local economy, so our residents have opportunities to work in their own community.

At the same time, La Center strongly supports protecting productive agricultural land. We believe a Transfer of Development Rights program can help us accomplish both goals.

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A TDR program can give farmers an opportunity to receive value from their development rights while keeping productive farmland in agricultural use. It can also help cities accommodate growth in places where infrastructure already exists and where growth makes sense.

La Center is committed to working with the County and other cities on a countywide TDR program. La Center agrees that we will not annex the properties we are requesting into the City until a TDR program is in effect.

I am submitting an exhibit with my testimony that provides additional information about the proposed de-designation areas and La Center UGA expansion findings.

In response to Countywide Planning Policy 1.1.24, which calls for implementation of a countywide Transfer of Development Rights (TDR) program beginning in 2027, David Toyer will be sharing findings on behalf of the cities.

La Center respectfully asks the Council to support the growth areas identified for our community and to continue working with La Center and the other cities to establish a strong countywide TDR program that benefits all communities.

Please see the de-designation findings below for the City of La Center.

La Center (Junction Plan) De-Designation Findings

1. In accordance with WAC 365-190-050(3)(a) and WAC 365-190-310(1)(c), the Junction Plan Expansion Area should no longer be designated agricultural resource lands of long-term commercial significance because the area is already characterized by urban growth as follows:

    a. Since 2007, these properties have been designated as an "Urban Reserve" area and identified as being for future expansion of the La Center UGA for employment. The Urban Reserve designation is applied to lands "*identified as being possible future additions to urban growth areas*" in the comprehensive plan and the overlay is intended to "*protect areas from premature land division and development that would preclude efficient transition to urban development.*" Clark County Code Chapter 40.40.250.100. This Urban Reserve designation is inconsistent with the land's continued designation as agricultural land of long-term commercial significance as:

        i. The urban reserve status intimates the land will eventually transition for urban use, automatically giving the land a higher valuation for alternative uses. WAC 365-190-050(3)(c)(x)

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ii. The urban reserve overlay comprehensive plan designation necessitates adjacent communities planning for the eventual, future extension of public utilities to these areas. WAC 365-190-050(3)(c)(iv), (v), and (vii)

b. The City of La Center, public agencies, and private parties have heavily invested in the adjacent land to the south at the I-5/La Center Road Junction, including substantial public investments in long-term transportation infrastructure and building out of commercial development.

c. The Junction Plan area is bordered to the south by trust land that is expected to be developed by the Cowlitz Indiana Tribe and is also adjacent to urban public facilities and services, including municipal water, as well as proximate to stormwater conveyance and public sewers. WAC 365-190-050(3)(c)(iv)

d. Expected development of adjacent properties, including tribal trust lands, will form an urban land use settlement pattern and intensity of land uses that will be incompatible with agricultural practices, including traffic, noise, etc. WAC 365-190-050(3)(c)(v), (vii), (viii), and (ix)

La Center (Southeast Employment Area) De-Designation Findings

1. In accordance with WAC 365-190-050(3)(a) and WAC 365-190-310(1)(c), the Southeast Employment Expansion Area should no longer be designated agricultural resource lands of long-term commercial significance because the area is already characterized by urban growth as follows:
    a. Since 2007, these properties have been designated as an "Urban Reserve" area and identified as being for future expansion of the La Center UGA for employment. The Urban Reserve designation is applied to lands "*identified as being possible future additions to urban growth areas*" in the comprehensive plan and the overlay is intended to "*protect areas from premature land division and development that would preclude efficient transition to urban development.*" Clark County Code Chapter 40.40.250.100. This Urban Reserve designation is inconsistent with the land's continued designation as agricultural land of long-term commercial significance as:
        i. The urban reserve status intimates the land will eventually transition for urban use, automatically giving the land a higher valuation for alternative uses. WAC 365-190-050(3)(c)(x)
        ii. The urban reserve overlay comprehensive plan designation necessitates adjacent communities planning for the eventual, future extension of public utilities to these areas. WAC 365-190-050(3)(c)(iv), (v), and (vii)
    b. The City of La Center, public agencies, and private parties have heavily invested in the adjacent land to the south at the I-5/La Center Road Junction, including

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substantial public investments in long-term transportation infrastructure and building out of commercial development.

c. The Southeast Employment area is just south of trust land that is expected to be developed by the Cowlitz Indiana Tribe as part of their continued plans and is also adjacent to urban public facilities and services, including municipal wate. WAC 365-190-050(3)(c)(iv)
d. Expected development of adjacent properties, including tribal trust lands, will form an urban land use settlement pattern and intensity of land uses that will be incompatible with agricultural practices, including traffic, noise, etc. WAC 365-190-050(3)(c)(v), (vii), (viii), and (ix)

La Center UGA Expansions Findings

According to data in the VBLM and the FEIS, Alternative 1 would leave the La Center UGA with an employment deficit of 46 jobs that cannot be addressed through additional zoning changes within the UGA.

1. La Center's proposed UGA expansions are necessary to address a deficit of jobs in the UGA and would result in a surplus of 92 jobs, which represents a localized UGA sizing safety factor of 4.3% for jobs and composite UGA sizing safety factor of 2.8% for jobs, which safety factors are consistent with those upheld in other county comprehensive plans.
2. The La Center UGA expansions would support the orderly development of commercial and employment areas at the I-5/La Center Road Junction.

Sincerely,

Angie Merrill

Angie Merrill, City Planner