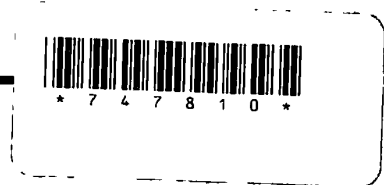


**Schroader, Kathy**



**From:** Jeff Sarvis <Jsarvis@ci.lacenter.wa.us>  
**Sent:** Monday, October 19, 2015 9:53 AM  
**To:** Bruce Prenguber, Cnty 2016 Comp Plan  
**Cc:** Eric Eisemann  
**Subject:** RE: Letter Supporting La Center Employment Land UGA Expansion

Thank you Bruce!

**From:** Bruce Prenguber [<mailto:bruce@globalwiseinc.com>]  
**Sent:** Monday, October 19, 2015 9:37 AM  
**To:** [comp\\_plan@clark.wa.gov](mailto:comp_plan@clark.wa.gov)  
**Cc:** Jeff Sarvis <Jsarvis@ci.lacenter.wa.us>, Eric Eisemann <[e.eisemann@e2landuse.com](mailto:e.eisemann@e2landuse.com)>  
**Subject:** Letter Supporting La Center Employment Land UGA Expansion

To Clark County Councilors & Community Planning Staff.

At your earliest convenience please review the attached letter in support of expanding the UGA for employment land at the La Center Junction.

Sincerely,

Bruce Prenguber  
Globalwise Inc  
Tel 360-696-3888  
Mobile 360-904-3015  
E-mail [bruce@globalwiseinc.com](mailto:bruce@globalwiseinc.com)

**Schroader, Kathy**

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**From:** Bruce Prenguber <bruce@globalwiseinc.com>  
**Sent:** Monday, October 19, 2015 6:26 PM  
**To:** Cnty 2016 Comp Plan  
**Subject:** Letter Supporting La Center Employment Land UGA Expansion  
**Attachments:** Prenguber BOCC Letter 10 19 15 FINAL.pdf

To Clark County Councilors & Community Planning Staff.

At your earliest convenience please review the attached letter in support of expanding the UGA for employment land at the La Center Junction.

Sincerely,

Bruce Prenguber  
Globalwise Inc  
Tel 360-696-3888  
Mobile 360-904-3015  
E-mail [bruce@globalwiseinc.com](mailto:bruce@globalwiseinc.com)

**Schroeder, Kathy**

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**From:** Bruce Prenguber <bruce@globalwiseinc.com>  
**Sent:** Monday, October 19, 2015 7:56 PM  
**To:** Orjiako, Oliver  
**Cc:** Cnty 2016 Comp Plan, Jeff Sarvis (Jsarvis@clacenter.wa.us), Eric Eisemann  
**Subject:** FW: Letter Supporting La Center Employment Land UGA Expansion  
**Attachments:** Prenguber BOCC Letter 10.19.15 FINAL.pdf

Hello Mr. Orjiako,  
Earlier today (at 9:37 am) I sent an e-mail with the enclosed attachment to [comp.plan@clark.wa.gov](mailto:comp.plan@clark.wa.gov). Tonight at 5:54 pm I received notice that its delivery failed. I am sending that earlier message and attachment to you.

It is very important that this letter be considered in the record for the current comp plan review. It is also my understanding that Mr. Jim Irish will include this with other information in his testimony on Oct 20.

Thank you for assisting in getting this letter in the record and for consideration in the comp plan review.

Bruce

Bruce Prenguber  
Globalwise Inc  
Tel 360-696-3888  
Cell 360-904-3015

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**From:** Bruce Prenguber  
**Sent:** Monday, October 19, 2015 9:37 AM  
**To:** 'comp.plan@clark.wa.gov'  
**Cc:** 'Jeff Sarvis'; 'Eric Eisemann'  
**Subject:** Letter Supporting La Center Employment Land UGA Expansion

To: Clark County Councilors & Community Planning Staff

At your earliest convenience please review the attached letter in support of expanding the UGA for employment land at the La Center Junction.

Sincerely,

Bruce Prenguber  
Globalwise Inc  
Tel 360-696-3888  
Mobile 360-904-3015  
E-mail [bruce@globalwiseinc.com](mailto:bruce@globalwiseinc.com)

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Facsimile (360) 696-3888

October 19, 2015

Clark County Board of Councilors  
P O Box 5000  
Vancouver, WA 98666-5000

*RE. La Center Employment Land UGA Expansion*

Dear Councilors Madore, Mielke and Stewart:

On September 17, 2015 the Clark County Planning Commission conducted a hearing on the four (4) Alternatives for the 2016 Comprehensive Plan SEIS. During deliberations on the La Center request to add 57 acres of AG land into the La Center UGA for industrial purposes, a Commission member acknowledged that the Planning Commission had "not done its homework" relating to the AG De-designation request <sup>1</sup> Consequently, on the motion to add the 56 acres into the La Center UGA the Planning Commission recorded a tie vote. Because the Planning Commission had "not done its homework" they were wise to not forward a recommendation to the County Councilors.

The purpose of this letter is to help the Council understand the distinction between the County-wide 2006 AG-Designation and the site-specific La Center request now before you. I urge you to carefully review the 2015 reports I prepared for the de-designation of agricultural resource land

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<sup>1</sup> Clark County Planning Commission minutes, September 17, 2015 at p 88, Barca, " *but from the Planning Commission, I don't think we've done any kind of homework to see that we've got it right and we're voting on it because we like it or don't like it* "

## Letter to Board of Councilors

at the La Center Junction <sup>2</sup> I also reviewed agricultural resource lands and prepared reports for Clark County in 2006-2007 for the County's 2007 Comprehensive Plan Review <sup>3</sup> As author of all of these documents, I am most qualified to compare and contrast the scope and facts in these documents.

The 2007 and 2015 analysis and reports differ in very significant ways

- Today, conditions in the immediate vicinity of the Fudge and 3B NW LLC properties (Fudge/3B), the La Center UGA expansion request, have changed significantly compared to 8 - 10 years ago. Most notably, significant investments are being made in freeway, local roads, sewer, water, and electrical power infrastructure that I did not take into consideration in my 2007 work.
- Agricultural use of land around the La Center Junction continues to decline as more residential development has occurred to the west of I-5 and east of I-5. Clark County has approved development of public facilities and infrastructure on land in the immediate vicinity of the Fudge/3B properties. Notably the County's approval of the Kalama, Ridgefield, Woodland and La Center (KWRL) School Bus Facility
- The 2006-2007 reports and table summaries I authored for the preferred alternative to Clark County's 2007 Comprehensive Plan did not specifically evaluate the Fudge or 3B properties because they were aggregated with 29 other parcels in the subarea analysis. The Fudge/3B properties were a small portion of subarea LB-1; these two properties total 56.6 acres out of the 459.4 acres in the LB-1 area. At that time I also analyzed 18 other subareas with agricultural resource lands. However the 2015 reports I prepared for the Fudge/3B parcels present in-depth analysis of each property using all criteria required under the Growth Management Act for de-designation of agricultural lands.

Conditions in 2007 were far different from what currently exists at the La Center Junction: First, in 2007 the federal government had not established the 152 acre Cowlitz Indian Tribe Reservation, now abutting the La Center City limits. In 2007 my reports did not foresee and acknowledge the re-alignment of the I-5/La Center Road interchange and it did not acknowledge the pending construction of Clark Public Utilities water and electrical infrastructure facilities needed to serve development on the Reservation and surrounding areas. All of these approved urban-style road, water and electrical infrastructure improvements will physically affect the Fudge and 3 B NW LLC properties and their reasonable land use.

<sup>2</sup> The reports are titled Agricultural Resource Land Analysis of the Fudge Property at the La Center Junction and Agricultural Resource Land Analysis of the 3B NW LLC Property near the La Center Junction and were submitted to Clark County on April 30, 2015)

<sup>3</sup> My analysis resulted in these reports: Attachment B - Assessment of Resource Lands and Attachment E – Agricultural or Forest Zoned Properties in Preferred Plan Urban Growth Boundary Expansion where are included with the County memo "Bringing Resource Lands in to UGAs" dated May 21, 2007 by Marty Snell to the Clark County Board of Commissioners

## Letter to Board of Councilors

In 2007 I did not foresee the flurry of development activity on land zoned AG-20 adjacent to the Fudge/3B properties:

- Clark County-approved siting of the KWRL Transportation Cooperative complex immediately north of the Fudge/3B properties.<sup>4</sup>
- Clark County issued use multiple land use approvals for the Clark PUD regional well field and associated water transmission line and water treatment facility on land adjacent to the 3B property.<sup>5</sup>
- Clark County issued several land use approvals for the Clark PUD electrical utility substation abutting the Fudge properties<sup>6</sup>

The realignment of Paradise Park Road and La Center Road to meet expanded traffic volume are clear indications of the change in character to urban development and away from rural and AG use of properties. The Fudge/3B properties are centrally located next to the existing commercial development (Paradise Truck Stop) and have extremely good road access that is favorable to commercial uses but very unfavorable for agricultural use.

The 2007 with the 2015 reports themselves differ in substantive ways:

- The 2007 analysis reported only in general terms and briefly on the characteristics of 32 parcels totaling 459.4 acres. Due to this broad area coverage, in 2007 I spoke to very few property owners and I did not speak to the owners of the Fudge or the 3B NW LLC properties. The 2015 Fudge report has 23 pages of description and analysis and the 3B NW LLC report has 19 pages of description and analysis. I spoke to both property owners in the 2015 analysis.
- There was no specific evaluation of the net income from the land based on crop and livestock budgets in the 2007 reports; in 2015 the reports included enterprise budget analysis to determine expected net income (which is negative)
- The 2007 analysis covers 11 elements (most but not all) that are required in GMA for de-designation of agricultural land. The 2015 analysis covers all 14 elements called for in GMA.
- Only general conditions related to infrastructure such as roads and sewers for the entire subarea were reviewed in the 2007 reports. In 2015, in-depth analysis was presented on the specific infrastructure currently available or soon-to-be available for the Fudge/3B properties. The 2015 analysis drew on interviews with city officials, WSDOT, Clark PUD and other officials.

<sup>4</sup> Between 2006 and 2014 Clark County processed development permits for parcel #209699000 <http://gis.clark.wa.gov/gishome/property/?action=FindSN&account=209699000> and for parcel # 20974900, <http://gis.clark.wa.gov/gishome/property/?action=FindSN&account=209749000>

<sup>5</sup> Between 2010 and 2015 Clark County processed development permits for parcel #986028840 <http://gis.clark.wa.gov/gishome/property/?action=FindSN&account=986028840>

<sup>6</sup> Between 2009 and 2011 Clark County processed development permits for parcel #986027200, <http://gis.clark.wa.gov/gishome/property/?action=FindSN&account=986027200>

## Letter to Board of Councilors

- The 2015 reports included maps showing soil types, slopes, newly approved road infrastructure under construction or in place, and aerial photography with delineations of adjoining and nearby property uses. None of this information was available in the 2007 analysis at the individual property level.

In conclusion, there have been tremendous changes in land use, traffic, infrastructure in-place or planned in the vicinity of the Fudge and 3B NW LLC properties due to urbanization and expansion of public facilities. There has also been a corresponding decline in agricultural land use. The agriculture use of these two properties has been greatly degraded while their potential for commercial development has increased dramatically.

I hope this brief letter helps the Councilors with their homework and I urge you to carefully consider my 2015 reports. As I stated therein, the AG-20 land near the Fudge and 3B NW LLC properties is now characterized by urban development and the Fudge and 3B NW LLC properties themselves satisfy the criteria for Agriculture De-designation.

Sincerely,



Bruce Prenguber, President  
Globalwise, Inc

Copy    Oliver Orjiako, Clark County Community Planning Director  
          James T. Irish, Mayor of La Center  
          Jeff Sarvis, La Center Public Works Director  
          Eric Eisemann, E<sup>2</sup> Land Use Planning Services, LLC  
          Steve Horenstein, Esq., Horenstein Law Group