July 10, 2014

Clark Board of County Commissioners
P.O. Box 9810
1300 Franklin Street
Vancouver, WA 98660-9810
Sent via email

Re: Comprehensive Plan – 2016 Urban Growth Area Changes

Dear Commissioners:

Recently, the La Center Planning Commission approved multiple motions to evaluate the following UGA expansion and zoning amendments during the 2016 Comprehensive Plan Update process:

1. A small expansion of its UGA at the 1-5/La Center Road Junction for employment purposes,
2. Potential up-zoning land in the downtown core from Residential Professional to Commercial to encourage additional employment opportunities, and
3. Zoning options to increase multi-family housing opportunities in or near the city center.

UGA Expansion and City Zoning

Clark County requested the cities to identify whether a city will propose changes to its Urban Growth Area (UGA) and Comprehensive Plan during the 2016 Comprehensive Plan Update. As shown in the attached figure, the properties under consideration for UGA expansion are owner-endorsed and include:

<table>
<thead>
<tr>
<th>Assessor #</th>
<th>Owner (address)</th>
<th>Zoning</th>
<th>Gross Acres</th>
</tr>
</thead>
<tbody>
<tr>
<td>209746000</td>
<td>3B NW LLC, 7320 NE St. Johns Rd., Vancouver, WA 98665</td>
<td>AG-20 (Ind. Reserve)</td>
<td>12.45 Ac.</td>
</tr>
<tr>
<td>209705000</td>
<td>Fudge Estate, C/o Griffith Trust, PO Box 180, La Center, WA 98629</td>
<td>AG-20 (Ind. Reserve)</td>
<td>24.10 Ac.</td>
</tr>
<tr>
<td>209748000</td>
<td>Fudge Estate, C/o Griffith Trust, PO Box 180, La Center, WA 98629</td>
<td>AG-20 (Ind. Reserve)</td>
<td>20.00 Ac.</td>
</tr>
</tbody>
</table>

All three parcels abut the city limits and are currently zoned AG-20 with an Industrial Reserve Overlay. The City will evaluate the properties consistent with their 2007 Commercial Comprehensive Plan designation and with a C-2 zone. A commercial (C-2) zoning district at the
La Center Junction is intended to serve a broader semi-regional population. The City, in conjunction with the property owners, will analyze the potential of the parcels for long-term commercial significance.

In 2007 the La Center Comprehensive Plan forecast a 2024 population of 9,827 persons and 4,065 total jobs which would be consistent with the County’s 2035 Planning Assumption of 1.1 jobs per household. However, La Center lost a significant amount of employment lands as a result of a successful court challenge to the County’s 2007 Comprehensive Plan and the jobs to housing balance in La Center is out of balance.

Currently, there are approximately 825 jobs in the La Center UGA. The County proposes to allocate 1,367 jobs to La Center based on current Vacant Buildable Lands (VBL) analysis. The resulting 2,192 total jobs are far below the 2007 projection of 4,065 total jobs in the La Center UGA. Consequently, to help address the shortfall, La Center will propose a small expansion of its UGA for employment purposes and will evaluate up-zoning land in the downtown core.

**Principles and Values**
The City applauds the Principles and Values statement before the Board of Clark County Commissioners (BOCC). Among those most relevant to the La Center’s present request are:

- **Employment Lands**: Equalize land allocation and jobs/population ratio so that cities have equitable share of jobs -- diverse job base
- **Other Land Use**: Respect cities’ investment in capital facilities by not shrinking the 2007 urban growth boundaries
- **Mapping Implications**: La Center needs greater economic diversification opportunities and multi-family land use designations

**County-Wide Plan Policies (CWPP)**
We have reviewed the proposed amendments to the County-Wide Plan Policies and offer the following comments into the record:

- **CWPP 1.1.18.** As a consequence of the legal challenge to the 2007 County Comprehensive Plan, La Center lost a significant portion of its job creating UGA. There is no longer any need for a new bridge across the East Fork of the Lewis River. The City proposes that CWPP 1.1.18 should be deleted.
- **CWPP. 1.1.19.** In 2007, the BOCC was aware that the federal government may establish a tribal reservation within the La Center UGA. Consequently, the BOCC offered to make La Center whole by adding new employment lands into the City’s UGA if the federal government established trust land near La Center. The possibility of establishing of trust land at the La Center I-5 Junction still exists. However, the proposed tribal reservation would not technically be created out of the La Center UGA; it would be created on lands currently designated as Industrial Reserve. Consequently, the City proposes to preserve the intent of CWPP 1.1.19 while clarifying the language of the existing policy as follows: “An additional 120 acres +/- of industrial land shall be added to the La Center Urban Area as an out-of-cycle subarea amendment if the United States government recognizes a new tribal
reservation on land currently designated for Industrial Reserve near the La Center Urban Area."

We appreciate this opportunity to comment and look forward to working with you again.

Sincerely,

Jeff Sarvis
Jeff Sarvis,
La Center Public Works Director

Attachment
Copy: Mayor James Irish
      Oliver Ojiko
      Laurie Lebowsky