

**From:** [Jeffrey Delapena](#)  
**To:** [tyler@ginngroup.com](mailto:tyler@ginngroup.com); [Cnty 2025 Comp Plan](#)  
**Cc:** [Oliver Orjiako](#); [Jose Alvarez](#)  
**Subject:** RE: Comment on DEIS  
**Date:** Monday, October 20, 2025 2:27:07 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[CC DEIS Comment Ginn Group.pdf](#)  
[image009.png](#)  
[image010.png](#)  
[image011.png](#)  
[image012.png](#)

---

Good day, Tyler,

Thank you for providing Ginn Group's feedback related to the Draft Environmental Impact Statement for the 2025 Comprehensive Plan Update.

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

Best regards,



**Jeff Delapena**  
Program Assistant  
COMMUNITY PLANNING

564.397.4558



NOTICE OF PUBLIC DISCLOSURE: This e-mail account is public domain. Any correspondence from or to this e-mail account may be a public record. Accordingly, this email, in whole or in part may be subject to disclosure pursuant to RCW 42.56, regardless of any claim of confidentiality or privilege asserted by an external party.

---

**From:** Tyler Phillips <[tyler@ginngroup.com](mailto:tyler@ginngroup.com)>  
**Sent:** Monday, October 20, 2025 2:13 PM  
**To:** Cnty 2025 Comp Plan <[comp.plan@clark.wa.gov](mailto:comp.plan@clark.wa.gov)>

**Subject:** Comment on DEIS

You don't often get email from [tyler@ginngrp.com](mailto:tyler@ginngrp.com). [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 find the attached letter from Ginn Group, a local real estate developer here in Clark County, WA.

Thank you,

**Tyler Phillips** | VP of Land Acquisition

✉ [tyler@ginngrp.com](mailto:tyler@ginngrp.com)

☎ [360-726-5375](tel:360-726-5375)



**GINN**  
GROUP™



*Building Something More*

This e-mail message may contain confidential or legally privileged information and is reserved only for the use of the intended recipient(s). Do not forward this message without sender approval.



**Date:** October 2<sup>nd</sup>, 2025

**To:** Community Planning Staff at Clark County

**Subject:** Comments on Draft Environmental Impact Statement – Clark County 2025-2045  
Comprehensive Plan Update

Dear Clark County Planning Staff,

On behalf of **Ginn Group, Inc.**, a Clark County based real estate development company with more than 15 years of experience, we appreciate the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the 2025 Comprehensive Plan update. Our firm has delivered thousands of homes to families in our community and has a long-term stake in ensuring that Clark County remains a place where people can find the affordable housing they need and want.

We recognize the challenges you face in balancing the state Growth Management Act requirements, infrastructure capacity, and community values. We also acknowledge the importance of planning for long-term sustainability. With that said, we would like to respectfully raise several concerns with the DEIS as it relates to the future viability of residential development in Clark County.

### **Concerns from a Development Perspective**

#### **1. Limited Opportunities for Single-Family Housing**

The DEIS places significant emphasis on higher-density zoning and upzoning of existing neighborhoods, while restricting opportunities for detached single-family homes. Our experience and surveyed feedback from homebuyers show that single-family detached homes remain the most sought-after housing type in Clark County. By limiting the land supply for this type of housing, the County risks creating a mismatch between community demand and available product which will drive potential residents of the County to neighboring communities & impact the County growth goals.

#### **2. Aggressive Growth Assumptions**

The DEIS assumes housing growth targets that may not be realistic given current financial conditions, including high interest rates, escalating construction costs, and labor shortages. Overreliance on these assumptions could result in zoning that looks good on paper and meets the mandate but does not translate into actual housing production.

#### **3. Infrastructure Funding Uncertainty**

While the DEIS acknowledges the significant demand that new growth will place on roads, schools, utilities, and other services, it does not provide a clear or actionable funding strategy. Developers are concerned that, in practice, the cost burden of infrastructure will fall disproportionately on private projects, making new housing even more expensive and take longer to deliver.

### **Recognizing County Priorities**

We understand and respect why the County has structured the plan in this way:

- **Compliance with state law:** Meeting GMA population and employment targets is non-negotiable.
- **Housing diversity goals:** Encouraging more housing types beyond detached homes addresses affordability and equity objectives.
- **Infrastructure efficiency:** Directing growth inward and upward makes use of existing services and limits outward sprawl.

We support these policy goals in principle. However, we believe they can be pursued in a more balanced way that also preserves and expands opportunities for detached single-family housing, which remains the cornerstone of housing choice for many Clark County residents.



We encourage Clark County to refine its approach by:

- Preserving additional land supply for single-family homes.
- Adjusting growth assumptions to reflect financial realities.
- Providing clarity on infrastructure funding responsibilities so developers can plan with confidence.
- Expanding the Urban Growth Areas where existing infrastructure is available or can be easily extended.

Our community benefits when planning staff and the development industry work together. We deeply respect the role of County staff in navigating complex state requirements, and we hope our comments are received as constructive input from a long-standing local partner.

Thank you for your consideration. We look forward to continued collaboration in shaping a comprehensive plan that works both for Clark County's future and for the families who call it home.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tyler Phillips", written over a horizontal line.

**Tyler Phillips**

Vice President of Land Acquisition, Ginn Group