

From: [Jeffrey Delapena](#)
To: [Cnty Community Planning](#); [Margaret M. Anderson](#)
Cc: [Jose Alvarez](#); [Oliver Orjiako](#); [Jenna Kay](#)
Subject: RE: Clark Public Utilities - Environmental Impact Statement Input
Date: Wednesday, November 26, 2025 8:13:41 AM
Attachments: [Clark County EIS Comments.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Margaret,

Thank you for submitting Clark PUD's feedback related to the Draft Environmental Impact Statement for 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

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From: Margaret M. Anderson <manderson@clarkpud.com>
Sent: Wednesday, November 26, 2025 7:51 AM
To: Cnty Community Planning <CommunityPlanning@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Subject: Clark Public Utilities - Environmental Impact Statement Input

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Good morning,

Attached find our input regarding the Environmental Impact Statement. If you have additional questions please contact Erica Erland, Director of Communications and Corporate Citizenship at eerland@clarkpud.com.

Please confirm receipt of our input.

Thank you,

Margaret Anderson
Assistant to CEO/General Manager



Commissioners

Nancy E. Barnes
Sherry S. Erickson
Jane A. Van Dyke

*Chief Executive Officer/
General Manager*

Lena Wittler

November 26, 2025

Clark County
Department of Community Planning
1300 Franklin St.
Vancouver, WA 98666 9810

**Re: Update to the Growth Management Comprehensive Plans (Draft EIS)
Clark Public Utilities Recommended Technical Corrections**

Dear Community Planning Department,

On behalf of Clark Public Utilities, we are recommending the following technical corrections to the County's Draft EIS associated with its Growth Management Planning:

Page 90:

Paragraph 2

"Electricity conservation by residents and businesses is encouraged by programs sponsored provided by ~~providers such as the Bonneville Power Administration (BPA)~~ and CPU (some programs are partially funded by the Bonneville Power Administration), sometimes in concert with local jurisdictions."

Paragraph 3

~~GPU offers financing for insulation, window replacement, sealing leaks, and for installation of heat pumps.~~

The utility offers low-income grants, but does not currently have a loan program for these measures.

Page 103:

References

Babbitts, M. 2025. Personal Business communication [e-mail] of August 1, 2025.
~~Energy Services Project Manager~~ Clean Energy Program Manager, Clark Public Utilities, Vancouver, WA.

Page 172

Table 96

The number of CPU wells is 58 not 35.

Page 188

First Partial Paragraph

CPU serves approximately 240,000 customers through a robust electrical system that includes ~~55~~ 54 substations and approximately ~~6,600~~ 5,000 circuit miles of power lines.

Page 197:

“Additionally, CPU is subject to Washington’s Clean Energy Transformation Act, which sets a statewide mandate to eliminate fossil fuels from electricity supply starting in 2045 and ensure 100% clean energy ~~over~~ at the end of 20-year planning horizon. Availability of electrical power is ~~therefore not~~ currently expected to be a limiting factor for urban growth.”

Page 200:

Paragraph 3

“Water service in expansion areas ~~would initially~~ will be provided by the utility designated to serve those areas under the Coordinated Water System Plan (CWSP). However, the water service boundaries may later be modified by an agreement between the water service providers that may allow a municipality to serve the expansion area after annexation. The procedure to modify water service boundaries is outlined in the CWSP. CPU until annexation or incorporation into municipal systems occurs. CPU anticipates having sufficient capacity to serve new development as it occurs.”

Page 208:

Paragraph 2

The county follows the Coordinated Water System Plan (CWSP) to decide who provides service (with the following priority), prioritizing the designated utility, then adjacent utilities, with then CPU available for interim satellite service (outside its territory), satellite service by another Department of Health approved Satellite Management Agency, and then finally creating a new utilities utility only as a the last resort. CPU remains the county’s satellite system manager and may operate satellites in other utilities’ territories by agreement. Rural extensions are limited to capacities that fit planned rural uses, transmission lines shouldn’t become tap-in feeders, and any rural extensions must be reflected in each individual utility’s Water System Plan and adopted by reference in the CWSP updates.

Please feel free to contact me if you have any questions.

Regards,

Erica Erland
Director of Communications and Corporate Citizenship
Eerland@clarkpud.com
(360) 992-3238