

**From:** [Jeffrey Delapena](#)  
**To:** [rarp.amplifygroup.com](#); [Cnty 2025 Comp Plan](#)  
**Cc:** [Oliver Orjiako](#); [Jose Alvarez](#); [Jenna Kay](#)  
**Subject:** FW: Comprehensive Plan EIS Comment  
**Date:** Monday, December 1, 2025 11:05:15 AM  
**Attachments:** [Outlook-uhrbcrd](#)  
[ICC Clark Comp Plan EIS Comment 112925b.pdf](#)  
[image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Good day, Ron,

Thank you for submitting ICC's feedback related to the Draft Environmental Impact Statement for the 2025 Comprehensive Plan Update.

These will be entered into the Index of Record.



**Jeff Delapena**  
Program Assistant  
COMMUNITY PLANNING

564.397.4558



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**From:** rarp.amplifygroup.com <rarp@amplifygroup.com>  
**Sent:** Sunday, November 30, 2025 10:39 AM  
**To:** Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>  
**Subject:** Comprehensive Plan EIS Comment

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Thanks for the opportunity to comment.

***Ron Arp***

[Identity Clark County](#)

360.601.2991





*Business Leaders Building Community*

November 29, 2025

Comprehensive Plan EIS  
Community Planning  
PO Box 9810  
Vancouver, WA 98666

Dear County Council and Staff:

On behalf of the business leaders group Identity Clark County, we are offering a perspective regarding the options being considered under the Comprehensive Plan update.

After reviewing the draft Environmental Impact Statement, it is our recommendation for Council to utilize **Alternative 3** as its starting point for planning. Alternative 3 includes actions initiated by the city and county as well as all site-specific requests. We feel those actions should be honored unless otherwise proven to be at odds with achieving housing or employment generation goals selected by Council in its proposed Comprehensive Plan update.

Clark County and its cities have been tackling the complex challenges associated with modeling growth while balancing multiple factors including, for the first time, housing unit production based upon income strata. A target growth rate of 1.4 percent was selected from the range offered by the state government. The County and cities then embarked on the task of modeling how to make way for about 190,000 more people, 104,000 more housing units and 88,000 more jobs.

Tremendous flexibility will be required in order to accommodate population, housing and employment growth in Clark County. Clark County already is the second-most densely populated county in the state, second only to King County. Further, the land best suited for development already has been deployed as Clark County has become transformed as a thriving suburb of a Top 25 metropolitan area. It is impractical to presume that available land will convert at rates approaching those modeled in the Comprehensive Plan.

Further, we believe Clark County will preserve its rural character and agricultural production capacity despite the incorporation of relatively modest zoning changes. Compared to Alternative 1, Alternative 3 converts about 1,900 acres of agricultural land being rezoned to urban land. This equates to 3 percent of the 56,000 acres of land in Clark County farms (2022 Census of Agriculture) – a relatively small tradeoff to achieving 50 percent housing and employment growth over the next 20 years.

We look forward to continuing our discussions with city and county leaders as the Comprehensive Plan concludes and we all dedicate our energies to making this plan happen.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Mantei".

**Mark Mantei**  
Chair, Identity Clark County

A handwritten signature in black ink, appearing to read "Ron Arp".

**Ron Arp**  
President, Identity Clark County