

From: [Jeffrey Delapena](#)
To: ["sean@iccbusiness.org"](mailto:sean@iccbusiness.org)
Cc: ron@iccbusiness.org; [Josie Hyde](#); [Oliver Orjiako](#); [Jose Alvarez](#)
Subject: RE: ICC Clark County Planning Commission Comp Plan Comment Letter
Date: Wednesday, January 28, 2026 4:22:00 PM
Attachments: [ICC Clark County Planning Commission Comp Plan Comment Letter 012826.pdf](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Good day, Sean,

Thank you for providing this feedback for the Hearing to select the Preferred Land Use Alternative.

I am forwarding to additional members of Staff. Your comments will be brought to the attention of Planning Commission ahead of the Jan. 29th continuation of the Hearing to select the Preferred Land Use Alternative. This will also be added to the Index of Record.

Best regards,



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



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From: sean@iccbusiness.org <sean@iccbusiness.org>
Sent: Wednesday, January 28, 2026 4:19 PM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Cc: ron@iccbusiness.org; Josie Hyde <JHyde@wfgtitle.com>
Subject: ICC Clark County Planning Commission Comp Plan Comment Letter

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Jeffery –

On behalf of the business leaders group Identity Clark County, please accept the attached comment letter regarding the Comprehensive Plan Update addressed to the Clark County Planning Commission. We appreciate you forwarding this document to members of the planning commission.

Thank you,

Sean Philbrook, Vice President of Programs

Identity Clark County

360.904.6063



January 28, 2026

Clark County Planning Commission
c/o Jeffrey Delapena
PO Box 9810
Vancouver, WA 98666-9810

Submitted via email to: jeffrey.delapena@clark.wa.gov

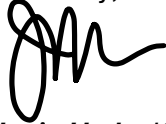
Chair Johnson and Clark County Planning Commissioners:

In reviewing testimony and correspondence, especially those from our cities which play such an important role in growth management, we offer the following observations:

- As you weigh policy tradeoffs, please consider that properties next to cities thought to be preserved for agricultural land likely will develop into multi-acre single-family estates. This does not advance efforts to protect farmland, generate housing units across income ranges, or generate necessary employment.
- Much of the property for de-designation will help us address our employment land shortage, which is essential for long-term economic viability and a strong tax base. With about 250,000 workers but about 180,000 jobs currently, our planning is perpetuating an unhealthy jobs gap. Employment land is limited, significant acreage already has been absorbed over the past three years, and acres are not converting at rates modeled in the draft plan. Flexibility is critically important, especially as we move into a 10-20 year construction process replacing the I-5 bridge and improving a five-mile influence area.
- Now is the time to take a step forward with Transfer of Development Rights. This policy tool is being used successfully elsewhere and there are willing partners locally who want to pursue this tool. It offers flexibility in development while also creating an opportunity to compensate agricultural land owners who wish to keep their land undeveloped through deed restrictions.
- Finally, we are concerned that rural site specific requests have been ignored and need to be placed on a path for orderly review.

This results in achieving a recommendation between Option 2 and 3. Thanks for your consideration.

Sincerely,



Josie Hyde, ICC Chair
Division President, WFG National Title



Ron Arp, ICC President

Cc: Clark County Council