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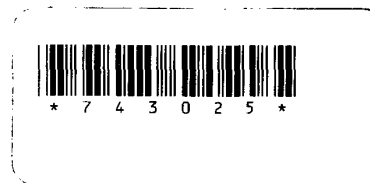
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VIA E-MAIL  
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July 13, 2015

Oliver Orjiako  
Director  
Clark County Community Planning  
PO Box 9810  
Vancouver WA 98660



Re: **Response to OFM projections**  
Our File No. 52268-73966

Dear Oliver:

Thank you for your letter, and discussion the other day. Regardless of what steps were taken by OFM to project population growth, and whether the data they relied upon was reasonable, we now know that those projections are wrong. The impact of those very conservative numbers ensures that Clark County will not have adequate land to provide housing for the many people that want to call our county home. We can expect that the constricted housing, commercial, and industrial land supply that these projections will create, will impact Clark County's ability to remain competitive in our region and nationally.

As the Washington Court of Appeals recently wrote in *Spokane County v. Eastern Washington Growth and Management Board*, "failure to allow public participation on decisions about future population size will adversely impact 'a whole host of planning functions including planning for increased housing, commercial facilities, transportation, potable water, wastewater treatment, and other public infrastructure to serve the significantly increased population.'" There has not been sufficient opportunity for public involvement in the process, and data provided by industry groups demonstrated that projections do not reflect market reality. In fact, the County Chair has acknowledged planning is occurring "using numbers that are well documented to be grossly unrealistic." This is exactly why public participation was held to be so important in the "Spokane County" case.

There was only one opportunity during a public hearing for industry to present data, and despite mounting evidence that the county's assumptions have been wrong, the course that the county and cities have taken has not been corrected. Even now, as elected officials admit that the data and assumptions are inadequate, there is no deviation from the numbers "documented to be grossly unrealistic." Continuing to rely on inaccurate data will substantially interfere with the goals of the GMA. As the Court wrote in *Spokane County* "all key planning decisions including those involving public facilities and services, residential and commercial zoning, road and highway design, and landfill placement to name only a few are contingent on the number of people that must be accommodated during the planning cycle."

We are letting the "process" ensure that we get it wrong. We are letting the "process" interfere with our economic opportunities. We are letting the "process" determine that working families will not be able to realize their dream of home ownership. The problem with letting the "process" dictate a fundamentally

Oliver Orjiako  
July 13, 2015  
Page 2

flawed outcome is that it will impact our growth for years to come. The infrastructure needed to serve the actual population will be insufficient and will need to be retrofitted and upsized. If we know that the data is bad, it is incumbent on us to correct it. This is a far cry from Spokane County, who decided how much land they wanted and arbitrarily ascribed a population growth number to ensure that they got that result. This is our county saying that we want to use the actual, best, and most recent data from the U.S. census bureau to determine what our need is. There is no specific acreage in mind. Rather there is a sincere desire to make sure that we get it right.

From 1960 to 2010 Clark County averaged an annual growth rate of 3.07%. Although the Great Recession dramatically slowed growth, we are now once again seeing numbers that are moving towards the historical average. However are projected growth is less than half the historic rate, and is already proving to be woefully insufficient.

I understand that "getting it right" could take a lot of special meetings, notice, etc., but that is what the people of Clark County deserve. I, personally, and virtually everyone I know, felt the effects of the Great Recession. Many good people lost their jobs, homes, savings, etc. The Great Recession was caused by factors outside of our control. A lack of available land, will also impact the economic well being of the people of Clark County, but that is something we can absolutely control.

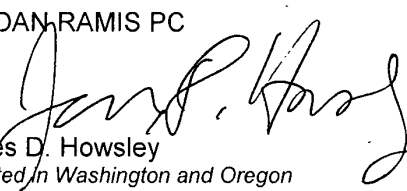
The OFM County Growth Management Study provides that "[i]f the county shows population dynamics that would invalidate the GMA projections before the next set of GMA projections is performed, the county may petition OFM to make changes to their forecast." Undoubtedly the county will need to go through that process, but in the meantime, further harm can be mitigated if the county chooses the "high" projection, which is still under the growth realized last year.

The fundamental flaw in the OFM study is weighting the five year average so heavily, coming out of a recession, instead of looking at a broader set of numbers that more accurately represent historic trends.

I have never regretted fighting to get it right. And, I will be there at every special meeting necessary to make this right, because the stakes are too high if we get it wrong. This is not a problem that one elected official, or one lawyer, or one planner can solve. This is a problem that all of us need to work together to solve. You have my commitment that I will be part of the solution. I need the county commit to the same thing.

Very truly yours,

JORDAN RAMIS PC

  
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