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VIA E-MAIL
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DAVID.MADORE@CLARK.WA.GOV

September 1, 2015

Community Planning
EIS Comments – 2016 Comp Plan Record
PO Box 9810
Vancouver WA 98666-9810

Board of County Councilors
PO Box 5000
Vancouver WA 98666-5000

Chairman David Madore
Board of County Councilors
PO Box 5000
Vancouver WA 98666-5000



Re: *GMA Draft EIS*
Our File No. 51516-73506

Dear Chair Madore, Board of County Councilors and Community Planning EIS Comments:

Clark County needs to reset this process. The Draft EIS continues to ignore concerns expressed in my earlier letters. This GMA process continues to rely on plainly false assumptions regarding the population growth rate through 2035. We request that the Board consider asking for an extension from the state legislature in 2016 to get the planning assumptions in line with the present realities.

The background is that OFM and the county take the reduced growth rates of the recent recession and project them forward 20 years. But the recession was an aberration and in the last couple years the growth rate has returned to normal. As noted by the Brookings Institution, the recession years were an anomaly, and now popular metropolitan areas are returning to faster growth rates, especially our own. And of course for a 20 year plan, the data from a limited aberrant period cannot be expected to continue in the long term.

The 2012 OFM report, which is based on a November 2011 forecast, notes the reduced migration of the recession, and remarkably states: "[n]o attempt is made to predict the timing and magnitude of any significant migration rebound." In other words, the data the county relies on presumes there will not be an economic recovery after 2011. But now the data through 2014 is in, which shows the in-migration is rebounding, and the annual overall growth rate is up to 1.67%. Obviously the 2012 report erred.

Of course the erroneous population assumption drives the erroneous conclusions about land needed and related long range planning metrics. Remember that our county has an influx of young adults for whom we will need surplus land for housing as they transition from apartments to houses. Young adults also drive the need for parks, employment and educational lands, as their children enter school and the parents settle into their careers. Our metro area is third highest in the entire country for in-migration of young adults aged 25-34. This data is consistent with OFM's 2013 Population Trends data which shows the percentage of senior citizens in Clark County is below the state average.

Board of County Councilors
Community Planning, EIS Comments
August 21, 2015
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Instead of trudging forward with bad data that will lead us to messy litigation, the county should pause to reconsider the assumptions the Draft EIS is built upon. 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." The County should ask OFM to do just that.

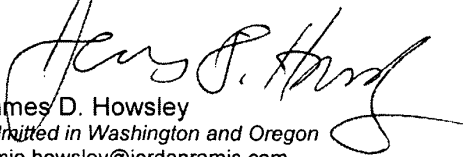
Reset Request

The County Board is on the cusp of an historic change, and will grow from 3 to 5 members in January, 2016. The current Board should not proceed with the controversial GMA update before the new commission takes office. We recognize that time is short, and suggest a postponement of further action on the GMA Update. The Board could go to the 2016 legislature for approval of a delay to allow the new board to learn about the update, and to allow OFM to revise the erroneous population numbers. The alternative is years of litigation which certainly will be slower and more expensive in the long run and may lead to a similar result.

This remains a problem that all of us need to work together to solve to make room for the next generation of families, and I look forward to working with you for that purpose.

Very truly yours,

JORDAN RAMIS PC



James D. Howsley
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OR Direct Dial (503) 598-5592

cc: Oliver Orjiako (via e-mail)

Schroader, Kathy

From: Lisa McKee <lisa.mckee@jordanramis.com>
Sent: Tuesday, September 01, 2015 4:25 PM
To: Cnty 2016 Comp Plan; Madore, David; Cnty Board of County Councilors General Delivery
Cc: Jamie Howsley; Joseph Schaefer; Peter Watts
Subject: LT from Jamie Howsley re GMA Draft EIS Comment
Attachments: LT re Draft EIS comment.pdf

Hello,

Attached is a letter from Mr. Jamie Howsley. If you have any trouble opening the attachment please let us know.

Thank you.

LISA McKEE | Legal Assistant to James D. Howsley
Jordan Ramis PC | Attorneys at Law
Direct: 360-567-3909 Main: 360-567-3900

Portland OR | Vancouver WA | Bend OR
www.jordanramis.com

Schroader, Kathy

From: Orjiako, Oliver
Sent: Tuesday, September 01, 2015 4:51 PM
To: 'Lisa McKee'
Cc: Schroader, Kathy
Subject: RE: LT from Jamie Howsley re GMA Draft EIS Comment

Hello Lisa:

This is to acknowledge receipt of your email and the attached letter. Staff will index and made available to the PC and BOCC. Thanks.

Best,

Oliver

From: Lisa McKee [<mailto:lisa.mckee@jordanramis.com>]
Sent: Tuesday, September 01, 2015 4:44 PM
To: Orjiako, Oliver
Subject: FW: LT from Jamie Howsley re GMA Draft EIS Comment

Hello,

Attached is a letter from Jamie Howsley that he asked you receive a copy of as well.

Let me know if you have any trouble opening the attachment.

Thank you.

LISA McKEE | Legal Assistant to James D. Howsley
Jordan Ramis PC | Attorneys at Law
Direct: 360-567-3909 Main: 360-567-3900

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From: Lisa McKee
Sent: Tuesday, September 01, 2015 4:25 PM
To: 'comp.plan@clark.wa.gov'; 'david.madore@clark.wa.gov'; 'boardcom@clark.wa.gov'
Cc: Jamie Howsley; Joseph Schaefer; Peter Watts
Subject: LT from Jamie Howsley re GMA Draft EIS Comment

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