#### Schroader, Kathy



From:

Orjiako, Oliver

Sent:

Thursday, November 12, 2015 7 43 AM

To:

Euler, Gordon, Alvarez, Jose; Anderson, Colete, Albrecht, Gary, Hermen, Matt, Kamp,

Jacqueline, Lebowsky, Laurie, Lumbantobing, Sharon

Cc:

Schroader, Kathy

Subject:

FW Action items going forward

**Attachments:** 

Staff Feedback on Planning Assumption Choices docx

Follow Up Flag:

Follow up

Flag Status:

Flagged

FYI and for the record Thanks

From: Madore, David

Sent: Wednesday, November 11, 2015 8:30 PM

To: Onjako, Oliver; Horne, Chris

Subject: RE: Action items going forward

Oliver,

I've added my dialog to the marked up document that you emailed. It is attached

This dialog is helpful to consider the arguments for and against column B. In the end, I trust that Planning will support the Board's policy and that staff reports will reflect that policy. Internal drafts are useful to help us all understand these proposals better.

These internal draft documents are not intended to be published to other bodies as they will obviously be considered as advocacy by staff to oppose proposed Board policies

I trust that as the Board chooses particular proposals, as we have by advancing column B in our work session, that staff will not continue to advocate against those policies, but instead provide support the proposed or adopted policies

Please let me know if I understand correctly. Thank you,

David

From: Orjiako, Oliver

Sent: Tuesday, November 10, 2015 1:12 PM

To: Madore, David

**Cc:** McCauley, Mark; Cook, Christine **Subject:** RE: Action items going forward

Hello Councilor

Per your request, attached please find staff (including PA) responses to the later version of your document. I have also provided the materials staff provided to the Planning Commission.

In order to provide you staff verification and analysis in addition to the responses to your document, we need information on your methodology particularly the exclusions and the source of the data on the non-conforming lot chart. Staff need to reconcile the building permit information. As soon as we get these staff will be able to forward our verification and input to you. Please, let me know if you have questions. Thank you

Best,

Oliver

From: Madore, David

Sent: Tuesday, November 10, 2015 9:25 AM

**To:** Orjiako, Oliver; Madore, David **Subject:** Action items going forward

Oliver,

Thank you for presenting the schedule yesterday that moves our Comp Plan update forward. Now that the Board has given direction to propose column B to the community, we need to equip you with the concise documents to present to our community at the two open houses scheduled next week.

It is very important that we focus only on the maps, tables, and assumptions of column B and not confuse citizens with other versions or previous plans.

I will provide you will the content this week to present that aligns with our Board's direction set in the joint work session.

Please let me know if I can be of service in any way, answer any questions you have, or clarify any points

GIS has had the proposed maps that they and I have worked on for weeks. Please protect and preserve those maps so they cannot be changed and so we can potentially adopt them as is. That includes the rural VBLM software, database, and the numbers that GIS provided for the documents I presented yesterday.

As we related yesterday and as stated in our documentation supporting column B, we do not wish for staff to change anything or go back and find every possible cluster remainder lot. As written in the proposal, we are good with the maps, assumptions, and numbers as proposed.

I do look forward to your verification and analysis of the information. If you recommend any revisions or corrections, please share those with me asap

As we also discussed at the work session, some of the population numbers in the DSEIS do not align with some of our numbers that we thought we adopted. I look forward to your help as we ought to nail these down this week so we can present them at the open houses.

Please send a Word version of the document that your staff marked up from a previous draft of my proposed assumptions document .

Please also send a Word version staff report that your department provided to the Planning Commission

Thank you for presenting the schedule for the Comp Plan process yesterday. We are counting on that schedule so we don't lose any forward momentum. If for any reason, you feel that the schedule needs to be changed, please notify us right away.

Many have expressed concern about staying on schedule. Let's do all that we can to accomplish that goal

If you create any more related documents, please also copy a Word version to me Please continue to copy any staff emails to me related to the Comp Plan so we can ensure no communication gaps.

Thank you,

David

### **Clark County**





### CHECKING IN ON OUR FUTURE

# **Proposed Changes to Planning Assumptions**

An Evidence Based Proposal by Councilor David Madore 11/4/2015

This document focuses primarily on the rural components of the Comp Plan, particularly Alternative 1 and Alternative 4. The proposal contrasts existing choice A with the proposed choice B and provides the factual basis for each. Table 1 provides the assumptions that define the methods for calculating the capacity for rural parcels to accommodate population growth. Table 2 provides the general planning assumptions for population growth, accommodate that growth, GMA considerations, and logical conclusions. The Reference Section provides relevant evidence, the historical basis, and supporting calculations for the two tables. The purpose of this document is to present decision makers with the compelling need to revise the original draft assumptions with more accurate, appropriate, realistic, and evidence based foundations and to apply the insight gained from staff, cities, citizens, the GIS database, and actual historical records.

Table 1: GIS Rural Vacant Buildable Lands Model (VBLM) Assumptions

Ref	A (existing)	B (proposed)
KEI	Remainder lots of already developed cluster developments with permanent covenants prohibiting further development shall be counted as rural parcels that will develop.	Parcels that cannot reasonably be expected to develop should not be counted as likely to develop. Those include remainder lots of already developed cluster developments that are prohibited from further development.  No concrete data is available to support findings regarding the number of remainder lots. Cluster remainder lots have not been excluded from the rural capacity estimates because there is no systemic way of identifying them and excluding them. We are working on identifying those subdivisions that are in the Tidemark system since 1999 and providing parcel level data to GIS to digitize. Those cluster developments prior to 1994 will require identification through the data we have on microfilm.
1		These parcels have not been legally identified. Plat notes have not been reviewed to determine whether further division is actually precluded on these parcels. Staff has not been advised which land is excluded as cluster remainders, and has no basis to conclude how much land is excluded, or whether the exclusion of this land is appropriate.  As stated in the November 9 presentation, the
		VBLM planning assumptions are not used to authorize or prohibit development of individual parcels. Rather, the planning assumptions are used as a tallying tool to count parcels likely to develop and not count parcels not likely to develop. These assumptions do not change the parcel zoning.
2	Parcels located in areas far from any infrastructure with continuous long term commercial forestry operations are counted as rural parcels that will develop.  Parcels meeting this criterion were excluded from the number of developable lots in the DSEIS. Nothing in CCC would prohibit development, and their owners may be relying upon the developability of those	Parcels located in areas far from any infrastructure with continuous long term commercial forestry operations likely to continue should not be counted as likely to develop. This conclusion is contrary to law. This planning assumption has nothing to do with the law that authorizes or prohibits development of individual parcels. As stated in the November 9 presentation, the VBLM planning assumptions are

Se Seco	lands. Those parcels should have been	not used to authorize or products development of
		not used to authorize or preclude development of
	included in the calculations.	individual parcels. Rather, the planning
46%		assumptions are used as a tallying tool to count
		parcels likely to develop and not count parcels
	w at the	not likely to develop. These assumptions do not
9999		change the parcel zoning. Our accounting
		methods have nothing to do with owners
		authorization to develop or not to develop.
	Rural parcels including 100% of	Rural parcels that have less than 1 acre of
	environmentally constrained areas that lack	environmentally unconstrained land necessary for
	the necessary area for septic systems and	
		septic systems and well clearances should not be
	well clearances shall be counted as rural	counted as likely to develop.
	parcels that will develop.	. <u>The Habitat Ordinance, CCC 40.440.020.B.{3}</u> ,
	·	and the Wetlands Ordinance, CCC
1340		40.450.010.{B}.(4.)(c), ordinances each have a
NIE S		reasonable use provision which states: "This
		chapter shall not be used to deny or reduce the
1	1 1 V	number of lots of a proposed rural land division
		allowed under applicable zoning density." New
	president and the second of th	advanced septic technologies allow for systems
		where lots not previously considered feasible for
3		development are now developable.
		To determine whether any particular parcel can
是多		be developed it must be reviewed on an
No.		individual basis. Rural parcels may share wells
15 30	A Section 19	with neighbors, and septic drain fields may be
		placed on neighboring properties.
		As stated in the November 9 presentation, these
STEEL STATE		planning assumptions are not used to determine
		if development is possible. Rather, they are used
	[세계] [1] [1] [1] [1] [1] [1] [1] [1] [1] [1	to predict if parcels are more likely than not to
	[ - [ - [ - ] - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [ - ] - [	develop. Although it is possible to place septic
		systems on neighboring parcels, it is rare.
		Therefore, it is not likely.
7 2 7	The adopted "Never to Convert" deductions	The adopted VBLM used for urban areas assumes
	used by the VBLM inside the Urban Growth	that a percentage of properties that have an
	Boundaries shall be omitted outside the	
		existing residence will likely not divide further.
	Urban Growth Boundaries. All built and all	That same 30% "Never to Convert" assumption
	vacant rural parcels shall be counted as rural	should apply to already built rural parcels as well.
4	parcels that will develop.	The adopted VBLM used for urban areas assumes
		that a percentage of vacant properties will likely
		not divide further. That same 10% "Never to
		Convert" assumption should apply to vacant rural
		parcels as well.
	Late that are up to 100's all a that the	This would be a BOCC policy decision.
5	Lots that are up to 10% smaller than the	Same
E PAR	minimum lot size should be considered as	

	conforming lots and counted as likely to	
	develop as provided by current county code.	
6	All nonconforming parcels with at least 1 acre shall be counted as rural parcels that will develop.	10% of (legal?) nonconforming parcels with at least 1 acre of unconstrained area will likely develop at the same rate indicated by historical records. No concrete data is available to support these findings. This would be a BOCC policy decision.  No concrete evidence is available to support assumption A. Yet there is ample experience and virtually unanimous counsel from the Technical Advisory Committee on Septic Systems that inform us that assumption A is unrealistic and assumption B is the norm that we should use.
	The 15% Market Factor used for urban	A deduction of up to 7.5% is appropriate to
7	parcels to provide some margin for the law of supply and demand to satisfy the GMA affordable housing goal inside the UGB shall not apply outside the UGB.  The market factor is an addition to the land needed in an urban growth area to accommodate 20-year growth projections, because of assumed fluctuating demand for that area. WAC 365-196-310(4)(b)(ii)(F).  Market factor is a tool used to size the UGA and does not directly impact the number of lots under study. The market factor is not used to satisfy the affordable housing goals.	provide some margin for the law of supply and demand of rural parcels to help satisfy the GMA affordable housing goal.  The market factor is not used to satisfy the affordable housing goals. It is used to size an area, not to determine the number of lots in the area.  Market factor, the use of which is authorized by the WAC, is an addition to the amount of land available for development, not a subtraction. It is extremely unlikely that all of the lots designated as available for development over a 20-year period will develop over 8 years, after which time a new GMA update will be due, and can make any revisions that are then needed. Subtracting an arbitrary number of lots from the 20-year supply is not supportable in law or reason.  As  As stated in the November 9 presentation, the Market Factor is named not for how it is implemented, but for the reason that it is implemented - to provide a means to add a margin necessary to fulfill the GMA goal of affordable housing. Affordable housing is unachievable if the supply just equals demand. There must be a means to always have some margin of supply. Ample experience has recognized that a 15% margin is appropriate for Clark County properties. The law of supply and demand is universal. The Market factor provides
		an subtracting a margin from the target supply or by adding a margin to the target population. The urban areas can add that margin by allowing

		higher density or by increasing the size of the UGA. Since the rural areas cannot increase the size of the rural areas, the GMA requirement to accommodate the forecasted growth must allow the existing rural area to reasonable zoning accommodation.  The GMA requires us to provide a 20 year supply, not a 8 year supply. Else we would be out of compliance with that requirement.
8	A 27.7% infrastructure deduction is use for urban parcels. But because rural parcels are larger, the rural infrastructure deduction is assumed to be small. No deduction shall be used for rural parcels for any infrastructure such as roads, storm water, parks, schools, fire stations, conservation areas, lakes, streams, protected buffers, Etc.	Same An infrastructure deduction in the rural area would be unsupportable because infrastructure needs do not reduce the number of available lots there, given code allowances for inclusion of land associated with roads and private stormwater facilities. This is a moot point since no infrastructure deduction is being proposed.

**Table 2: Planning Assumptions** 

Planning Assumption	A (existing)	B (proposed)
1	The 20 year urban population is forecasted to increase by 116,609.	Same <u>577,431-448,845 *.9= 115,727 (urban) 12,858</u> <u>(rural)</u>
2	The actual historical urban/rural split has consistently been 86/14. But a 90/10 split shall be used instead to lower the rural population growth forecast to only 12,957 persons.  The urban/rural split means the allocation of the population growth, not the allocation of the population itself, between the urban and rural areas. The population itself may have been split 86%/14% over the period from 1994 to 2014, but that is not the same as the population growth split, which was 89%/11% during that period.	The actual historical urban/rural split that has consistently been 86/14 should be used as the factual basis to forecast a realistic rural population growth of 16,325 persons.  Urban/Rural split is a planning assumption used to determine the percentage of growth that is anticipated in the urban and rural areas respectively. The 1994 plan used an 80/20 split. The 2004 and 2007 plan updates both used a 90/10 split. The attached table indicates the total annual population of the county and rural areas from 1994 to 2014. The percentage of county population residing in the rural area has declined from 15.47% to 13.87% in the 20 year period. This decline is captured in the 11.18% percent of total growth going to the rural area in the same time interval. From 2007 to 2014 the percent of rural growth has been 10.42% of total county growth. See 6th column on page 5.  The urban/rural split is based on the future growth, not the population, for a particular year. This is a policy call. The 1994 80/20 split was

		considered reasonable and approved as appropriate. It would be irrational to claim that the previously accepted 80/20 is acceptable while an 86/14 split is not. In 1994, the actual urban/rural split was 85/15 while a high density rural population growth plan was adopted. The proposed 86/14 split is not higher density than the historical records. This history demonstrates that the proposed 86/14 split is well within the reasonable range known to be acceptable.
3	The annual county-wide population growth rate is forecasted to be 1.25%. Increasing from 447,865 in 2015 to 577,431 in 2035 is a total increase of 129,566 persons which is 1.279% per year.  448,845 is the estimated population for the 2015 base year. GIS and Planning use natural log versus Average Annual Compound Growth rate to calculate growth rate. What is the derivation of the 1.279%?	The county-wide population with the 86/14 split is forecasted to increasing from 447,865 in 2015 to 580,799 in 2035 for a total increase of 132,934 persons which is 1.308% per year.  (0.029% higher than A).  580,799 is 0.58% higher than 577,431.  We should use the same method for calculating the annual growth rate in percent as the OFM.  The correction for the mismatch between the DSEIS and the last numbers adopted by the BOCC must be corrected. The BOCC can resolve the dilemma by selecting the numbers and growth rate within a reasonable range of numbers and growth rates. Of course, the policy should select parameters that are not excessively different than DSEIS numbers.
4	The above assumptions assert that Alternative 1 can accommodate 18,814 new persons which is 45% too high in the rural areas. (18,814 / 12,957)	The above updated assumptions show that Alternative 1 can only accommodate 8,182 new persons which is 50% too low. Thus Alternative 1 is not viable since it cannot comply with the GMA requirement to provide for the forecasted growth. (8,182 / 16,325)  The urban/rural split is based on the future growth-, not the population, for a particular year. If assumption 2B is selected by Board policy, then this outcome is simply as mathematical fact.
5	The above assumptions assert that Alternative 4 can accommodate 32,987 new persons which is 155% too high and therefore stated by the SDEIS to have too much impact. (32,987 / 12,957)	The above assumptions assert that Alternative 4 can accommodate 16,332 new persons to fit the forecasted rural population growth nearly exactly.
6	The Alternative 4 map without mitigation revisions does not preserve large parcels near the UGBs for future employment, removes 20 acre AG zoning, and is said by the SDEIS to change the rural character.	The Alternative 4 updated map includes mitigation that increases the variety of parcels, preserves large parcels near the UGBs for future employment, and better preserves the rural character by including 20 acre AG minimum lot sizes.

	Clark and the same to be to the	
	Cluster options may be but are not	Rural cluster options are to be integrated into
	necessarily included in any	Alternative 4 per previous direction given by the
	Alternative and therefore may not be	Board for all rural zones to preserve open space
	available to preserve open space or	and to better provide for large areas of habitat.
	large areas of habitat.	Residential cluster development in the
	Clustering is currently allowed by	agricultural areas would need to comply with
	code in the Rural zones. Code	RCW 36.70A.177, as well as other GMA provisions
7	changes that would govern clustering	concerning protection of resource industries.
	should be adopted, consistent with	Clustering is recommended as means to preserve
	GMA, after a preferred alternative is	open space and large contiguous areas of habitat.
	selected.	Is there any specific law that prohibits cluster
		options in AG or FR zones? Have cluster options
		been approved for other counties? Is so, then we
		know that it is a viable option. If not, please
		reveal that documentation.
<b>发发发音</b>	Alternative-1 defines 60% of existing	The updated Alternative-4 definition and map
	R parcels as nonconforming, 70% of	should be adopted to correct the mismatch
	existing AG parcels as	between Alternative 1 and the actual ground
	nonconforming, and 80% of existing	truth, to respect predominant lots sizes, to
	FR parcels as nonconforming.	resolve some spot zoning problems, and to best
	The DSEIS does not recommend the	accommodate the forecasted population.
	selection of any alternative. The	Some of the issues include the following:
	numbers cited are not a legal	Legal lots, spot zoning, low-density rural sprawl,
8	problem, but rather describe the	protection of resource lands, rural character,
	rural landscape.	capital facilities needed to accommodate growth,
		and water supply.
		The capital facilities needed to accommodate the
		proposed rural growth is mathematically less than
		the currently adopted plan. The numbers in
		choice B are less, not more than that. Thus an
		argument against an increase in capital facilities
		cost is by comparison fallacious.

## Reference Section – the factual basis for assumptions

The following table documents the actual urban / rural split for the last 20 years:

Year	County- wide Population	Rural Population	Percent Rural Population	Urban / Rural Split	Percent of Population Growth in Rural Area The proposed policy uses the population
------	-------------------------------	---------------------	--------------------------------	---------------------------	------------------------------------------------------------------------------------

					as in the
					original
					table.
1995	279,522	43,254	15.5	84/16	<u>na</u>
1996	293,182	44,882	15.3	85/15	<u>11.9</u>
1997	305,287	46,409	15.2	85/15	<u>12.6</u>
1998	319,233	48,104	15.1	85/15	12.2
1999	330,800	49,429	14.9	85/15	<u>11.5</u>
2000	346,435	51,182	14.8	85/15	<u>11.2</u>
2001	354,870	52,002	14.7	85/15	<u>9.7</u>
2002	369,360	53,548	14.5	85/15	10.7
2003	375,394	54,146	14.4	86/14	<u>9.9</u>
2004	384,713	54,869	14.3	86/14	7.8
2005	395,780	56,009	14.2	86/14	<u>10.3</u>
2006	406,124	57,551	14.2	86/14	<u>14.9</u>
2007	414,743	58,608	14.1	86/14	12.3
2008	419,483	59,042	14.1	86/14	9.2
2009	424,406	59,623	14.0	86/14	11.8
2010	427,327	59,858	14.0	86/14	8.0
2011	432,109	60,544	14.0	86/14	14.3
2012	435,048	60,845	14.0	86/14	10.2
2013	443,277	61,489	13.9	86/14	7.8
2014	446,785	61,948	13.9	86/14	<u>13.1</u>

Source: Clark County Assessor GIS records based on the population. From 1995 through 2014, the total population of the county grew from 279,522 to 446,785, which is total growth of 167,263. During the same time, the county's rural population grew from 43,254 to 61,948, or 18,694 additional residents in the rural area. The overall percent of the county's total population growth from 1995 through 2014 that occurred in the rural area was 11.2, and the urban/rural split, as that term is generally used for comprehensive planning, was 89/11. Again, this is a policy call that falls well within the 80/20 split adopted in the 1994 plan.

The following table documents the actual capacity of the rural area to accommodate the potential population increase for Alternative-1 and Alternative-4 using proposed choice B assumptions compared to the existing choice A assumptions considered in the DSEIS.

	Alt-1 Capacity per DSEIS Choice A (existing)	Alt-1 Actual Capacity Choice B (proposed)	Alt-4 Capacity per DSEIS Choice A (existing)	New Alt-4 Actual Capacity Choice B (proposed)
Rural Zone	5,684	2,570	9,880	4,710
Agriculture Zone	970	286	1,958	733
Forest Zone	419	162	563	1,097
Nonconforming likely		183		74
Other Rural Zones		124		124
Gross potential growth home sites	7,073	3,325	12,401	6,638
7,5% Market Factor  deduction The market factor is an addition to the land needed in an urban growth area to accommodate 20-year growth projections, because of assumed fluctuating demand for that area.  WAC 365-196-310(4)(b)(ii)(F).  The market factor can be implemented in multiple ways to comply with the affordable housing goal of the GMA. This is a simple way to ensure that a small margin is accommodated.	0	-249	0	-498
Net potential growth of home sites	7,073	3,076	12,401	6,140
Potential population growth	18,814	8,182	32,987	16,332

Source: Clark County GIS: Columns 1 and 3 are from the DSEIS. GIS did supply numbers that appear in Columns 2 and 4, based upon Councilor Madore's requests and assumptions. New Alt 4 was not studied in the DSEIS. These are no longer "Madore's requests and assumptions. They reflect the Board's requests

and proposed assumptions. Please discontinue the old label and refer to these as choice B as proposed by the Board. As consistently communicated by the Board is numerous public meetings, the Board not only has the freedom, but the Board has communicated the necessity to incorporate the requests improvements and mitigations provided by the process. Alternative 4 is not Alternative 5 or a new alternative. It is the same alternative with the mitigations and refinements requested. Those revisions fall well within the numbers considered in the SDEIS.

The following table provides the forecasted population for choices A and B.

ref	Year	County- wide Population A	County- wide Growth A	Urban Growth A & B	Rural Growth B	County- wide Growth B	County- wide Population B
0	2015	447865 Should be 448,845 This Depends on how the Board resolves the SDEIS error.	0	0	0	0	447865 Should be 448,845 This Depends on how the Board resolves the SDEIS error.
1	2016	453591	5726	5153	721	5874	453739
2	2017	459391	11526	10373	1452	11825	459690
3	2018	465265	17400	15660	2192	17852	465717
4	2019	471213	23348	21013	2942	23955	471820
5	2020	477238	29373	26436	3701	30137	478002
6	2021	483340	35475	31928	4470	36398	484263
7	2022	489520	41655	37490	5249	42739	490604
8	2023	495779	47914	43123	6037	49160	497025
9	2024	502118	54253	48828	6836	55664	503529

2025	508538	60673	54606	7645	62251	510116
2026	515040	67175	60458	8464	68922	516787
2027	521626	73761	66385	9294	75679	523544
2028	528295	80430	72387	10134	82521	530386
2029	535050	87185	78467	10985	89452	537317
2030	541891	94026	84623	11847	96470	544335
2031	548819	100954	90859	12720	103579	551444
2032	555837	107972	97175	13605	110780	558645
2033	562943	115078	103570	14500	118070	565935
2034	570141	122276	110048	15407	125455	573320
2035	577431	129566	116609	16325	132934	580799
	2026 2027 2028 2029 2030 2031 2032 2033 2034	2026     515040       2027     521626       2028     528295       2029     535050       2030     541891       2031     548819       2032     555837       2033     562943       2034     570141	2026       515040       67175         2027       521626       73761         2028       528295       80430         2029       535050       87185         2030       541891       94026         2031       548819       100954         2032       555837       107972         2033       562943       115078         2034       570141       122276	2026         515040         67175         60458           2027         521626         73761         66385           2028         528295         80430         72387           2029         535050         87185         78467           2030         541891         94026         84623           2031         548819         100954         90859           2032         555837         107972         97175           2033         562943         115078         103570           2034         570141         122276         110048	2026       515040       67175       60458       8464         2027       521626       73761       66385       9294         2028       528295       80430       72387       10134         2029       535050       87185       78467       10985         2030       541891       94026       84623       11847         2031       548819       100954       90859       12720         2032       555837       107972       97175       13605         2033       562943       115078       103570       14500         2034       570141       122276       110048       15407	2026       515040       67175       60458       8464       68922         2027       521626       73761       66385       9294       75679         2028       528295       80430       72387       10134       82521         2029       535050       87185       78467       10985       89452         2030       541891       94026       84623       11847       96470         2031       548819       100954       90859       12720       103579         2032       555837       107972       97175       13605       110780         2033       562943       115078       103570       14500       118070         2034       570141       122276       110048       15407       125455

Thus the 2035 rural population growth forecasted using assumptions choice B is 16,325 that leaves the forecasted urban growth rate the same but updates the urban/rural split to 86/14.

### Correcting the population growth planning assumptions:

The planning assumptions published on Table S-1 on page of the SDEIS show the following:

Total population projection for 2035 = 577,431

Projected new residents = 129,566

The 2015 population = 577,431 – 129,566 = 447,865

Annual population growth rate = 1.25%

Urban/rural population growth split = 90% urban, 10% rural

Thus the 2035 urban population growth = 129,566 This number is incorrect; the correct number is 128,616, and is shown on Table 1-1 Summary of Planning Assumptions on page 1-2 of the DSEIS. \*0.9 = 116,609

The numbers are based on the SDEIS numbers that we published In the table at the beginning of that document. There is a disagreement with the SDEIS and previously adopted BOCC numbers. The Board can reconcile these by policy within a reasonable range.

Thus the 2035 rural population growth = 129,566 \*0.1 = 12,957

The more precise annual population growth rate using the original choice A assumptions is calculated as follows:

577,431 / 447,865 = 1.2893

The  $20^{th}$  root of 1.2893 = 1.279 which translates to a 1.279% annual growth rate.

Councilor Madore's calculation of the growth rate results in the average annual geometric growth rate compounded annually. Planning and GIS, however calculate an average annual exponential growth rate with continuous compounding. Again, please refer to this data as choice B data proposed by the Board, not as "Madore's calulations". We should use the same method and definition as used by the OFM.

The corrected annual population growth rate is calculated as follows: 580,799 / 447,865 = 1.29682

The  $20^{th}$  root of 1.29682 = 1.01308 which translates to a 1.308% annual growth rate.

Councilor Madore's calculation of the growth rate results in the average annual geometric growth rate compounded annually. Planning and GIS, however calculate an average annual exponential growth rate with continuous compounding. See the note above.

Thus, the forecasted annual population growth rate using choice A assumptions is 0.029% higher than the forecast of choice A assumptions.

(1.308% - 1.279% = 0.029%) The method used to calculate the growth rate here results in the average annual geometric growth rate compounded annually. Planning and GIS, however calculate an average annual exponential growth rate with continuous compounding. See the note above.

The proposed planning assumptions for choice B are as follows:

Total population projection for 2035 = 580,799 (0.58% different)

Total county-wide increase = 132,934 persons (2.6% different, 132,934 / 129,566)

Annual county-wide population growth rate = 1.308% (0.029% different)

Urban/rural population growth split = 86% urban, 14% rural (updated from 90/10)

Thus the 2035 urban population growth = 116,609 persons (same)

Additional details will be provided.

#### **Population Comparisons**

	DSEIS	Corrected 2015 base population	Proposed	Proposed with 2015 base population adjustment
2015 Base	448,815	448,845	447,865	448,845
Growth	128,616	128,586	132,934	131,954
2035 forecast	577,431	577,431	580,799	580,799
Average Annual Exponential Growth	1.26	1.26	1.30	1.29

Rate (Continuous Compounding) Average Annual Geometric Growth Rate (Compounding

Annually) 1.27 1.31 1.30

Planning and GIS have provided a corrected 2015 base population of 448, 845. Based on that number, the countywide growth over 20 years is estimated to be 128,586. The estimated growth rate would then be 1.29 %.

The Board will select reasonable numbers and growth rates. This is necessary due to the disagreement with the numbers in the SDEIS and the previously adopted numbers.