The need to plan for realistic rural population growth

Unrealistic assumptions overstated the rural capacity:
The SDEIS has overstated the rural capacity of Alternatives 1, 2, and 4 to accommodate potential population growth by making the following unrealistic assumptions:

Remainder lots of already developed cluster developments with permanent covenants prohibiting further development should be counted as rural parcels that will develop.

Large scale commercial forestry parcels owned and operated by major forest industry companies with long term commitments to continue those operations located in areas with no basic infrastructure should be counted as parcels that will develop.

All rural parcels should be counted as parcels that will develop including 100% of environmentally constrained areas.

All rural parcels that lack sufficient space for septic systems and state mandated well clearances due to environmental constraints should be counted as parcels that will develop.

All reasonable assumptions used by the Vacant Buildable Lands Model inside the Urban Growth Boundaries including the “Never to Convert” deductions and Market Factor deduction should be omitted outside the Urban Growth Boundaries.

The historical basis of the last 20 years of Clark County Assessor GIS records documenting the actual urban/rural split between 85/15 and 86/14 should be disregarded. A 90/10 urban/rural split should be used instead.

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

Source: Clark County Assessor GIS records:

Correcting the rural calculations with more reasonable assumptions
The rural VBLM has been updated to include the following assumptions:

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. These have been marked as “exclude” on the maps used for Alternative-1 and Alternative-4.

Parcels located in areas far from any infrastructure and parcels owned and operated by major forest industry companies with long term commitments to continue operations on those parcels should not be counted as likely to develop. These have been marked as “exclude” on the maps used for Alternative-1 and Alternative-4.

Rural parcels that have less than 1 acre of environmentally unconstrained land for septic systems and well clearances should not be counted as likely to develop.

Lots that are up to 10% smaller than the minimum lot size should be counted as provided by current county code.

The adopted Vacant Buildable Lands Model (VBLM) used for urban areas assumes that a percentage of properties that have an existing residence will likely not divide further. That same 30% “Never to Convert” assumption should apply to rural parcels as well.

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 rural parcels as well.

The adopted VBLM used for urban areas assumes a 15% residential Market Factor to provide a reasonable margin for the law of supply and demand to satisfy the GMA affordable housing goal. That same 15% Market Factor should apply to rural parcels as well.

The adopted VBLM used for urban areas includes a 27.7% infrastructure deduction for urban parcels for roads and storm water. Because rural parcels are much larger than urban parcels, no infrastructure deduction is assumed for rural parcels.

Incorporating updated assumptions and mitigations:
Alternative-1 defines 60% of existing R parcels as nonconforming, 70% of existing AG parcels as nonconforming, and 80% of existing FR parcels as nonconforming. Alternative-4 corrects this fundamental mismatch between Alternative-1 and the actual ground truth of existing conditions. The local rural character as informed by the existing predominant lots sizes serves as the evidence base for Alternative-4.

In contrast to an all or nothing approach that accepts or rejects an unchangeable draft, the concerns and recommendations expressed by the SDEIS, citizen testimony, and city representatives have provided valuable feedback to make Alternative-4 better. As a result, Alternative-4 has been updated to lessen impacts and mitigate concerns.

The more realistic assumptions defined above have been incorporated.

Larger minimum rural lot sizes have been preserved near the Urban Growth Boundaries to better provide for potential future employment lands.

AG-20 zones have been included to better satisfy the GMA goal of providing a variety of lot sizes. In contrast to the single 20-acre zone of Alternative-1, Alternative-4 provides three zones, AG-5, AG-10, and AG-20.

Clustering is recognized as an important option that is integral to the R, AG, and FR zones to minimize environmental impacts and to preserve open resource and space in large aggregated areas.

The actual numbers:
The following table documents the actual potential capacity of the rural area to accommodate the potential population increase for Alternative-1 and Alternative-4 using these updated assumptions compared to those considered in the DSEIS.

Rural Zone	Alt-1 Capacity per DSEIS	Alt-1 Actual Capacity	Alt-4 Capacity per DSEIS	Alt-4 Actual Updated Capacity
Rural	5,684	2,682	9,880	4,790
Agriculture	970	301	1,958	763
Forest	419	174	563	1,176
Total potential new home sites	7,073	3,157	12,401	6,729
15% Market Factor deduction	0	-474	0	-1,009
New potential home sites	7,073	2,683	12,401	5,720
Maximum potential rural population increase using 2.66 persons / home	18,814	7,137	32,987	15215

Accommodating the forecasted rural population with Alternative-4:
Using these assumptions with Alternative-4, the rural area can accommodate 15,215 new people. The following table shows the projected population growth for several options. If the medium OFM choice is retained, a 87/13 urban / rural split would most closely fit the actual Alternative-4 rural population growth capacity.

OFM Choice	County-wide increase	Rural increase using a 86/14 split	Rural increase using a 90/10 split
Medium	115,006	16,101	11,501
High	183,367	25,671	18,337