City-County Planning Directors Coordination Meeting

Outcomes:
- Discussion and consensus on adjustments to the growth allocation.
- Coordination on all BOCC work sessions on the Comp Plan update.

<table>
<thead>
<tr>
<th>Agenda Item</th>
<th>Introduced by</th>
</tr>
</thead>
<tbody>
<tr>
<td>Welcome &amp; Introductions (5 minutes)</td>
<td>Oliver Orjiako</td>
</tr>
<tr>
<td>Review of last meeting summary notes (5 minutes)</td>
<td>All</td>
</tr>
<tr>
<td>Adjustments of Growth Allocation discussion and Overview of BOCC 6/24 Hearing (30 minutes)</td>
<td>Oliver Orjiako</td>
</tr>
<tr>
<td>Progress on Cities process and proposed 2016 plans (20 minutes)</td>
<td>All</td>
</tr>
<tr>
<td>BOCC WS 7/16 and Open Houses for the SEPA scoping process (10 minutes)</td>
<td>All</td>
</tr>
<tr>
<td>Roundtable (10 minutes)</td>
<td>All</td>
</tr>
<tr>
<td>Next Meeting Agenda and Location (5 minutes)</td>
<td>All</td>
</tr>
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</table>

Please, plan on a group lunch in Vancouver after the meeting!

Next meeting: Time/location

August 8, 2014: In Washougal (10:00 – 12:00 p.m.)
<table>
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<tr>
<th>PRINT NAME</th>
<th>MAILING ADDRESS</th>
<th>ZIP CODE</th>
<th>PRINT - E-MAIL</th>
<th>TELEPHONE (optional)</th>
<th>e-mail list?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Eric Eisenman</td>
<td>c/o 215 W. 4th St</td>
<td>98660</td>
<td><a href="mailto:e.eisenman@e2mouse.com">e.eisenman@e2mouse.com</a></td>
<td></td>
<td>YES</td>
</tr>
<tr>
<td>Gary Albright</td>
<td>Clark County</td>
<td></td>
<td></td>
<td></td>
<td>NO</td>
</tr>
<tr>
<td>Robert Mauk</td>
<td>City of Camas</td>
<td>98607</td>
<td><a href="mailto:rmau@cityofcamas.us">rmau@cityofcamas.us</a></td>
<td></td>
<td>YES</td>
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<tr>
<td>Jose Alvarez</td>
<td>Clark County</td>
<td>98601</td>
<td><a href="mailto:jose.alvarez@clark.wa.gov">jose.alvarez@clark.wa.gov</a></td>
<td></td>
<td>NO</td>
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<tr>
<td>Cody Evler</td>
<td>Clark County</td>
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<td></td>
<td>NO</td>
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<tr>
<td>Erin Eldman</td>
<td>City of Battle Ground</td>
<td></td>
<td><a href="mailto:erin.eldman@cityofbg.org">erin.eldman@cityofbg.org</a></td>
<td></td>
<td>YES</td>
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<tr>
<td>Sandy Townsend</td>
<td><a href="mailto:Sandra.Townsend@ci.wa.gov">Sandra.Townsend@ci.wa.gov</a></td>
<td></td>
<td>487-7947</td>
<td></td>
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<tr>
<td>Mitch Kneipp</td>
<td>City of Washougal</td>
<td></td>
<td><a href="mailto:mknripp@ci.washougal.wa.us">mknripp@ci.washougal.wa.us</a></td>
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</table>
Meeting Notes

Friday, June 13, 2014

City Staff: Elizabeth Decker, City of Ridgefield / City of La Center, Erin Erdman, City of Battle Ground; Chad Eiken and Bryan Snodgrass, City of Vancouver; Bart Stepp, City of Woodland, Robert Maul and Sarah Fox, City of Camas, Amanda Smeller, City of Woodland.

County Staff: Oliver Orjiako, Gordy Euler, Gary Albrecht and Jose Alvarez
Meeting Notes by: Gary Albrecht

Welcome & Introductions
- Oliver welcomed everyone to the meeting and initiated introductions.

Review of last meeting Summary
- Last meeting summary discussed. No comments/questions.

Population & Employment Allocation Discussion
- Outcome of this meeting is to have a consensus in support of Issue Paper #4 if changes need to be made, then we would like to agree to the changes today.
- Commissioner Barnes is the newest Commissioner, and needs to be brought up to speed through the Issue Papers. And these papers are for our city partners to help clarify these issues.
- In Issue Paper #4, we tried to follow the city/county agreement on methodology of using the vacant and buildable lands model to allocate growth.
- On page #2, Oliver discussed “The following are essential to the outcome regardless of which method is used:”
- Oliver agreed to add additional language to ensure flexibility during the allocation process.
- Page #2 indicates consistency with local plans and using the OFM medium number; using scenario #4, 91,200 jobs and the vacant lands model in use since 1994, and allow for flexibility when necessary.
- Carrying capacity is not the same as the actual vacant land model capacity.
- VBLM is not a true capacity measure. Table 1, 2035 Population Forecast discussed.
- Table 2, 2015–2035 Employment Forecast by UGA discussed.
- VBLM does not show public sector jobs. This forecast includes Scott Bailey’s Public Sector jobs that range from 6,800 to 7,400 government jobs.
- 2007 Comprehensive Plan overrides discussed.
- Oliver discussed Issues to consider.
Oliver requests input on the 2014 VBLM from the cities. Comments can focus on ability to accommodate identified vacant lands model jobs, and sub area plans or overrides that are not identified in the vlm.

- Methodology should include market and redevelopment factors.
- Market factor is applied to acreage.
- Oliver mentioned the City of Vancouver edits to Issue Paper #4.
- Mixed use is applied in the vlm at different commercial/residential splits according to the jurisdiction.

- Issue Paper #4 does not discuss carrying capacity. The City of Vancouver indicates that the paper needs to express carrying capacity to truly understand allocation.
- Total jobs number does not seem accurate since the total number does not include the public sector jobs.
- Market factors need to be included in sizing the UGAs.
- Redevelopment is not included in the allocation analysis, and needs to be considered in the capacity estimate.
- Suggested assumptions to reconsider include the infrastructure estimate and a rural jobs allocation should be considered while allocating jobs to the UGAs.
- VBLM underestimates true capacity; it does not include completed sub-area plans, redevelopment, and vacancy rates.
- General consensus is to show more market factor information in the tables.

Consensus on the issues of showing a reduction of planning population number from 584,310 in 2007 to 562,207 in 2016, and what this reduction means to a UGA; will a reduced population mean boundary shrinkage?

- Are the commercial and industrial lands in the correct spots?
- Concerns about using the current methodology #3 outlined in Issue Paper #4.
- Deadline to submit draft and final land use to the County is July 10th for a draft and July 30th for a final land use plan.
2016 Comp Plan SEPA Scoping

- Oliver mentioned the upcoming SEPA Open Houses, and indicated county staff will contact the jurisdiction holding the Open House.

Open House Venues

<table>
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<tr>
<th>Venue</th>
<th>Venue Details</th>
<th>Date</th>
<th>Capacity</th>
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<tbody>
<tr>
<td>Vancouver</td>
<td>Ft. Vancouver Comm. Library 920 C Street Vancouver WA 98660</td>
<td>Tuesday, August 19 1st floor conf. room 125</td>
<td>Marla Young 906-5112 <a href="mailto:myoung@fvfl.org">myoung@fvfl.org</a></td>
</tr>
<tr>
<td>East County: Camas/Washougal</td>
<td>Lacamas Lake Lodge 227 NE Lake Road Camas WA 98607</td>
<td>Wednesday, August 20 Capacity 100</td>
<td>Susan Newlove 834-5307, x4481 <a href="mailto:snewlove@cityofcamas.us">snewlove@cityofcamas.us</a></td>
</tr>
<tr>
<td>West County: Ridgefield, La Center, Woodland</td>
<td>Ridgefield Community Center 210 North Main Ave Ridgefield WA 98642</td>
<td>Wednesday, August 27 Large room Capacity 100</td>
<td>Eric Eisemann 750-0038 <a href="mailto:e.eisemann@oe2landuse.com">e.eisemann@oe2landuse.com</a> On site: Julie Basarab <a href="mailto:Julie.basarab@ci.ridgefield.wa.us">Julie.basarab@ci.ridgefield.wa.us</a></td>
</tr>
<tr>
<td>North County: Battle Ground/ Yacolt</td>
<td>Battle Ground Comm. Center 912 East Main Street Battle Ground WA 98604</td>
<td>Thursday, August 28 Capacity 100</td>
<td>Sam Crummet, Planner Supervisor 342-5042 <a href="mailto:sam.crummet@cityofbg.org">sam.crummet@cityofbg.org</a> Judy Jones, Customer Service 342-5043 <a href="mailto:judy.jones@cityofbg.org">judy.jones@cityofbg.org</a></td>
</tr>
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</table>

Discussion of BOCC direction on Planning Assumptions

- Staff is asking the board to affirm the planning assumptions on page 6.

Cities proposed 2016 plans

Roundtable

- Woodland – Council will vote on extending marijuana moratorium at their next meeting. They will form an adhoc committee to help determine appropriate zones.
- Clark County – Working on Fireworks, last year’s advisory vote was to change the time of sales and time to shoot off fireworks. Hearing scheduled in June. Surface Mining Overlay hearing is on June 3rd. I–502 Marijuana Hearing is May 27th. Shoreline Master Program Limited Amendment, Open House in Ridgefield on June 24th, Planning Commission Worksession on July 10th and Hearing on July 17. Board Hearing on August 19. Working on a couple of annual reviews; 1) NE 10th recommended adding more acreage to last year’s proposal that was brought forward. 2) Camas/Washougal redesignation of parks/open space to light industrial zone.
- Battle Ground – 60-day moratorium on medical marijuana and collective gardens and will hold a public hearing on the 16th for a six month moratorium. One marijuana retailer license from I–502 lottery. Council gave authority for staff to move forward on a parcel for annexation on SR 502.
- Camas – One marijuana retail license and will work to find an appropriate site for sales. And will likely not allow production or processing in Camas. Property owner requested to be taken out of the Camas UGA and moved into Washougal’s UGA. Rep. Senator Pike got involved and the property owner was told to work with the City of Washougal. Looking to adopt an updated parks plan, and exploring the possibility of creating an LID for the north UGA.
- City of Vancouver – is updating their TIF program and the proposed new City TIF districts will end at the City boundary. The City sold the Esther Short Building; working on 4th Plain Corridor Bus Rapid Transit plan to downtown mall. Vancouver got 6 lottery marijuana retail licenses, 5 of the 6 do not meet the city’s standards. Working on a couple brownfield sub-area plans.
Clark County
20-Year Comprehensive Management Plan Review
2015-2035

SEPA Process
Rural Lands Review update
Other Issues

Oliver Orjiako, Director, Community Planning

BOCC Work Session ~ July 16, 2014
Agenda

1. Comp plan progress to date

2. Purpose of work session
   a. SEPA Process/possible alternatives
   b. Rural Lands Review update
   c. Other Issues

3. Next steps
2016 Comprehensive Plan progress to date

**July-Dec. 2013**
- GMA Overview
- VBLM Review
- Preliminary Scoping Timeline
- Public Participation Plan

**January 2014—December 2015**
- **DATA ANALYSIS**
  - Public Review & Comment
  - Dept. of Commerce Checklist
  - 20-year Population Range
  - Countywide Planning Policies
  - Regional Growth Trends & Allocation
  - Planning Assumptions
  - Buildable Lands Review
  - Land Use Technical Report
  - Housing Technical Report
  - Capital Facilities Technical Report
  - Transportation Technical Report
  - Environmental Technical Report
- **PLAN DEVELOPMENT**
  - Public Review & Comment
  - SEPA Analysis & Public Review
  - Urban Growth Area Review
  - Capital Facility Plan (CFP)
  - County Capital Facility & Financial Plan (CFFP)
  - VBLM Analysis
  - Land Use Transportation Analysis Zone
  - Regional Travel Demand Analysis
  - Draft Comprehensive Plan Text

**Jan-May 2016**
- **ADOPTION**
  - Public Review & Comment
  - Department of Commerce Review
  - Planning Commission Hearings
  - County Commissioner Hearings
  - Issue Notice of Adoption
### 2016 Planning Assumptions

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<th>Assumption</th>
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<tr>
<td>20-year population projection</td>
<td>562,207</td>
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<tr>
<td>Planned population growth (new)</td>
<td>136,844</td>
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<td>Urban/rural population growth split</td>
<td>90/10</td>
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<tr>
<td>Assumed annual population growth rate</td>
<td>1.12%</td>
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<tr>
<td>Housing type ratio</td>
<td>75% single-family, 25% multifamily</td>
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<tr>
<td>Persons per household</td>
<td>2.66</td>
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<tr>
<td>New jobs</td>
<td>91,200</td>
</tr>
<tr>
<td>Jobs to household</td>
<td>1:1</td>
</tr>
<tr>
<td>Infrastructure deduction, residential</td>
<td>27.7%</td>
</tr>
<tr>
<td>Infrastructure deduction, commercial and industrial</td>
<td>25%</td>
</tr>
<tr>
<td>VBLM (definition of vacant)</td>
<td>$13,000 residential, $67,500 commercial and industrial</td>
</tr>
<tr>
<td>Market factor</td>
<td>15% residential, 15% commercial, business park, industrial</td>
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State Environmental Policy Act (SEPA)
State Environmental Policy Act process

State Environmental Policy Act (SEPA)
- Requires potential environmental impacts from projects and non-development projects be reviewed

- Requires preparation of environmental impact statements (EIS) for large projects

- EIS contains: description of proposal and alternatives; analyses of potential impacts; known and potential mitigation

- EIS presents options and effects; not a decision document

- Scoping meetings initiate process
**General SEPA Process**

1. Environmental threshold determination
2. Development of alternatives
3. Request for comments on scope
4. Scoping open house
5. Draft Environmental Impact Statement
6. Final Environmental Impact Statement
Environmental Impact Statement

Elements of the environment studied

Natural environment:
- Earth
- Water
- Fish and wildlife habitat
- Energy and natural resources

Built environment:
- Land and shoreline use
- Transportation
- Public services and utilities
- GMA conformance
2016 Comp Plan Update-SEPA Process

- EIS prepared for 2007 plan update studied large area (maximum study area)
- Urban growth boundaries (UGBs) established with adoption of 2007 plan
- Challenges to 2007 plan resulted in current UGBs
- GMA requires 20-year land supply
- Can vacant and buildable lands in current UGAs accommodate population and employment, based on board decisions? If so, how?
- Prepare supplemental EIS (SEIS) based on 2007 EIS
- RFP out to hire consultant to prepare SEIS, draft and final
2016 Comp Plan Update-SEPA Process

Scoping Open Houses
Aug. 19, Vancouver Library
Aug. 20, Lacamas Lake Lodge
Aug. 27, Ridgefield Community Center
Aug. 28, Battle Ground Community Center

DSEIS Completion
December 2014

Joint BOCC/PC Hearing
January 2015

SEIS completion
April/May 2015
2016 Comp Plan Update-SEPA Process

Possible alternatives:

1. No action alternative: present plan as is

2. County-initiated actions to include:
   - Public facilities zoning designation
   - Map clean ups/recent BOCC decisions (SMO)
   - Arterial map update
   - Sub area plans
   - Rural lands

3. City requests plus alternative 2
Rural Lands Review Update
## Rural Lands Review Update

### April 3, 2013 BOCC Work Session

**Direction to staff**

- Clustering on resource land (short-term)
- Rural PUD (short-term)
- Minimum parcel size (short-term)
- Transfer of development rights (comp plan update)
- Rural Reserve/Ag production district (comp plan update)
- Current use; Public Benefit Rating System (comp plan update)

### Aug. 20, 2013 BOCC Hearing/Consent agenda

**Direction to staff**

- Not to proceed with a TDR pilot project
- Develop a rural preference census
Rural Lands Review Update

Sept. 25, 2013 BOCC Work Session

- Complete ordinance work (clustering; rural PUD)
- Complete analysis of FR-40 and AG-20 zones; include a census of affected property owners
- Continue work with Food Systems Council on proposal for ag production district

Jan. 22, 2014 BOCC Work Session

- No change to AG-20, FR-40 minimum parcel sizes
- Change minimum parcel sizes for AG-20 and FR-40 to 10 and 20 acres
  - Include clustering requirement – one-plus acre building lots with unbuiltable remainder as resource land
  - Build record to prove long-term commercial viability for forestry and agricultural being maintained or enhanced with smaller minimum parcel size
- Consider changing R-20 zoned parcels to R-10, based on proximity to AG-20 and FR-40
Next steps—Rural Lands Review

1. Complete draft code language for smaller parcel sizes on resource lands (comp plan)

2. Complete draft code language on rural planned unit developments (comp plan)

3. Complete draft code language on moving lot reconfigurations to non-conforming uses section

4. Prepare supporting document per Department of Agriculture farm census report
Other Issues

Response to inquiries regarding the designation of resource land:

- County required by GMA to adopt resource land designations by 1991

- County set resource land designations with adoption of 1994 Comprehensive Plan

- County resource designations for agriculture/forest lands and minimum rural parcel sizes appealed

- County decisions upheld Growth Management Hearings Board and Superior Court in 1995 and 1997, ruled compliant with GMA

- 2004 and 2007 Comprehensive Plan updates re-adopted resource designations and rural zoning, both found compliant with the GMA

- Memo summarizing background of resource land designation provided to BOCC
Questions?

www.clark.wa.gov/planning
Clark County Comprehensive Plan 2016 Update
Planning for growth 2015 – 2035
SEPA Scoping – Issue Paper 5

Purpose
This memorandum provides a basic framework and starting point from which the county and its cities will launch the environmental impact review process under the State Environmental Policy Act (SEPA). This process will be used to inform the public about three proposed growth alternatives, advertise the county’s intent to prepare a Supplemental Environmental Impact Statement (SEIS), and provide an opportunity to comment on the scope of impacts to be examined in the SEIS.

Background
In July 2013, Clark County began updating its Comprehensive Growth Management Plan to meet the 2016 periodic update requirement of RCW 36.70A.140. Community Planning prepared the following issue papers to help the Board of County Commissioners make decisions about the update:


This issue paper, Issue Paper 5, will discuss the environmental impact review process under the State Environmental Policy Act (SEPA) and seek Board direction on development of alternatives.

SEPA Process
Enacted in 1984, the State Environmental Policy Act (SEPA) requires local governments to evaluate environmental impacts that could result from actions they approve or undertake. The most common evaluation is to discuss potential impacts of a proposed development on various resources and qualities of the environment listed on the SEPA checklist. There also are non-project actions that are reviewed, such as adoption of code language or a new plan or policy. The completed checklist is shared with federal, state and local agencies, Indian tribes, neighborhood organizations and interested parties.

City-County Coordination Meeting 07/11/2014
Large development projects, such as an asphalt plant, and certain non-development projects, such as expansion of an urban growth area, require a more in-depth SEPA review, including, 1) identification and analysis of potential project-related impacts, and 2) consideration of possible alternatives to the proposed action. An environmental impact statement (EIS) is prepared, discussing any potential impacts. The county prepared an EIS in 2007, issuing both a draft EIS (DEIS) and a final EIS (FEIS). Comments on alternatives presented in the draft were used to determine a preferred alternative that was the focus of analysis in the FEIS.

For the 2016 update, the county is proposing to add to the 2007 environmental analysis, as needed, by preparing a supplemental EIS (SEIS). Under SEPA, analysis of a plan’s impacts is not required to be site-specific, but rather give an overview of impacts that could be expected under the alternatives.

The EIS process under SEPA begins with a scoping process. That is when the county seeks public input and Board direction to define issues related to the comprehensive plan update that will be addressed in the draft SEIS. The preferred alternative studied in the final SEIS and eventually adopted by the Board will reflect local jurisdictions’ input, Board directives, guiding principles and values and countywide planning policies. The SEIS and comprehensive planning process will end with adoption of an updated comprehensive growth management plan for Clark County.

Methodology
Since Clark County’s 2007 Comprehensive Growth Management Plan update, conditions in the county, as well as state and federal laws, have changed, requiring corresponding changes to the plan. The Board has adopted planning assumptions and principles and values that provide policy direction for reviewing and updating the county’s growth management plan by June 2016.

As stated above, preparation of an EIS must include alternatives, including a ‘no action’ alternative that maintains the status quo. Possible alternatives for review in the EIS are listed below.

**Alternative 1: No Action Alternative.** This alternative is the adopted Comprehensive Plan as amended in July 2014, with the current urban growth boundaries, planning assumptions, policies and implementation ordinances.

**Alternative 2: County-Initiated Actions.**

a) Urban growth areas adopted in July 2014.
b) Rural Land amendments to the Zoning Map, such as AG-20 to AG-10, FR-40 to FR-20 and R-20 to R-10, where needed.
c) Washougal UGA amendments to the Zoning Map to reflect county zoning and application of Urban Holding.
d) Vancouver UGA amendments to the Zoning Map to remove the Three Creeks Overlay.
e) Removal of Urban Holding in the area known as Fisher’s Swale.
f) New Public Facility zone.
g) Eliminate Comprehensive Plan Chapter 1 Table 1.6, Mixed Use footnote and subsequent Comprehensive Plan and Zoning changes.
h) Streamline commercial zones from three to two.
i) Zoning Map changes to include property owner site-specific requests, particularly within the Salmon Creek and Discovery planning areas.

j) Zoning Map cleanup of Urban Reserve application consistency, UR-10, UR-20 and UR-40; Comprehensive Plan and Zoning Map cleanup of Urban Holding application consistency.


**Alternative 3: City-Requested Actions.**

a) Urban growth areas adopted in July 2014.

b) County-initiated actions.

c) Expansion areas proposed by cities in July 2014.

d) At the request of property owners, sites that meet Board directives and other criteria. The new planning assumptions, policy direction, principles and values defined by the commissioners will be used in this alternative.

After the scoping process, land use alternatives will be developed based on technical analysis, input from cities, the Board’s principles and values and results of the environmental scoping and analysis. From the DSEIS, a preferred alternative will emerge, providing a 20-year land supply and meeting the 2014 planning assumptions and policy directions.

**NEXT STEPS**

During four open houses in August, the public is invited to comment on the scope of impacts to be examined in the Supplemental Environmental Impact Statement. All open houses will be 7 - 8:30 p.m.

Here are the open house dates and locations:

- **Tuesday, Aug. 19**
  - Fort Vancouver Community Library, 901 C St., Vancouver

- **Wednesday, Aug. 20**
  - Lacamas Lake Lodge, 227 N.E. Lake Rd., Camas

- **Wednesday, Aug. 27**
  - Ridgefield Community Center, 210 N. Main Ave., Ridgefield

- **Thursday, Aug. 28**
  - Battle Ground Community Center, 9123 E. Main St., Battle Ground
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<tr>
<th><strong>BASE RESIDENTIAL ASSUMPTIONS</strong></th>
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<td>2014 Total Population</td>
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<td>Annual Growth Rate</td>
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<td>2035 Total Population</td>
<td>562,207</td>
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<td>Total Population Growth</td>
<td>125,560</td>
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<td>Rural Population 10%</td>
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<tr>
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<tr>
<td>Urban Split</td>
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<td>Urban Population Growth</td>
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<td>Persons per household</td>
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<td>Households</td>
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<td>Net Acres Needed</td>
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<td>Infrastructure (INF)</td>
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<td>Net Acres + INF</td>
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<td>Market Factor (MF)</td>
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<td>Net Acres + INF+MF</td>
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<td>Surplus/Deficit</td>
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<td>2014 Non-Farm Employment</td>
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<td>2035 Non-Farm Employment</td>
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<td>Jobs/Household Ratio</td>
<td>1:1.12</td>
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<td>Total Job Growth</td>
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<td>7% Employment*</td>
<td>64,648</td>
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<td>Employees per Acre</td>
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<tr>
<td>Net Acres needed</td>
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<td>Infrastructure (INF)</td>
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</tr>
</thead>
<tbody>
<tr>
<td>21% Employment</td>
<td>19,152</td>
</tr>
<tr>
<td>Employees per Acre</td>
<td>9</td>
</tr>
<tr>
<td>Net Acres needed</td>
<td>2,128</td>
</tr>
<tr>
<td>Infrastructure (INF)</td>
<td>25.0%</td>
</tr>
<tr>
<td>Net Acres + INF</td>
<td>2,660</td>
</tr>
<tr>
<td>Market Factor (MF)</td>
<td>15%</td>
</tr>
<tr>
<td>Net Acres + INF+MF</td>
<td>3,099</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>SUPPLY</strong></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>VBLM Acres</td>
<td>4,917</td>
</tr>
<tr>
<td>Surplus/Deficit</td>
<td>1,858</td>
</tr>
</tbody>
</table>

* The employment number was reduced by 7,400. Those are jobs expected in Education and Government. Publicly owned land is considered exempt in the VBLM and so no employment is attributed to that land. In addition the infrastructure deduction assumes a portion would go toward schools.

Note: Existing assumptions of total potential jobs not captured by the vacant lands model increase the capacity by 16,775 jobs for redevelopment. If included in commercial allocation it would result in a 45 acre surplus of land.