Agenda Item No: 25.A



STAFF REPORT

Report To: Board of Supervisors **Meeting Date:** July 2, 2020

Staff Contact: Lee Plemel, AICP, Director

Agenda Title: For Possible Action: Discussion and possible action regarding a proposed Resolution

amending the maximum number of residential building permit allocations under the Carson City Growth Management Ordinance for the years 2021 and 2022 and estimating the maximum number of residential building permit allocations for the years 2023 and 2024; establishing the number of residential building permit allocations available within the development project and general property owner categories; establishing a maximum average daily water usage for commercial and industrial building permits as a threshold for Growth Management Commission review; and directing staff to forward the growth

management report to Nevada State legislators pursuant to the provisions of Assembly Bill

240 (2019). (Lee Plemel, lplemel@carson.org)

Staff Summary: The Board of Supervisors is required to annually establish the number of residential permits that will be available for the following calendar year pursuant to the Carson City Municipal Code Chapter 18.12 (Growth Management). This has historically been based upon a maximum growth rate of 3%. A total of 672 residential allocations are proposed to be made available for 2021. The commercial and industrial daily water usage threshold is 15,000 gallons per day annual average currently and is recommended to continue in 2021, above which Growth Management Commission approval is required. Assembly Bill 240 requires the City to annually provide a growth management report to the state legislators representing its jurisdictions by December 31 each year through the year 2022. This report will serve to meet that requirement.

Agenda Action: Resolution Time Requested: 20 Minutes

Proposed Motion

I move to adopt Resolution No. 2020-R- .

Board's Strategic Goal

Sustainable Infrastructure

Previous Action

May 27, 2020: The Growth Management Commission recommended approval of the proposed Resolution by a vote of 7 - 0. (The Planning Commission serves as the Growth Management Commission.)

Background/Issues & Analysis

Refer to the attached staff report to the Growth Management Commission for the meeting of May 27, 2020, for a complete discussion regarding the background, issues and analysis of the proposed action.

If you have any questions regarding this item, contact Lee Plemel, Community Development Director, at 283-7075 or lplemel@carson.org.

Attachments: 1) Resolution 2) Growth Management staff report to the Planning Commission dated May 27, 2020
Applicable Statute, Code, Policy, Rule or Regulation CCMC 18.12 (Growth Management); AB 240 (2019)
Financial Information Is there a fiscal impact? No
If yes, account name/number:
Is it currently budgeted? No
Explanation of Fiscal Impact:
Alternatives Modify the number of residential allocations or commercial/industrial water usage threshold
Attachments: GM-2020-0001.1 Resolution.docx
GM-2020-0001.2 PC Staff Report.pdf
Board Action Taken:

Motion:

(Vote Recorded By)

Aye/Nay

RESOLUTION NO. 2020-R-___

RESOLUTION AMENDING THE MAXIMUM NUMBER RESIDENTIAL BUILDING PERMIT ALLOCATIONS UNDER CARSON CITY GROWTH MANAGEMENT ORDINANCE FOR THE YEARS 2021 AND 2022 AND ESTIMATING THE MAXIMUM NUMBER OF RESIDENTIAL BUILDING PERMIT ALLOCATIONS FOR THE YEARS 2023 AND 2024; ESTABLISHING THE NUMBER RESIDENTIAL BUILDING PERMIT ALLOCATIONS AVAILABLE WITHIN THE DEVELOPMENT PROJECT AND GENERAL PROPERTY OWNER CATEGORIES: ESTABLISHING A MAXIMUM AVERAGE DAILY WATER USAGE FOR COMMERCIAL AND INDUSTRIAL **GROWTH BUILDING PERMITS** AS THRESHOLD FOR MANAGEMENT COMMISSION REVIEW: AND DIRECTING STAFF TO FORWARD THE GROWTH MANAGEMENT REPORT TO NEVADA STATE LEGISLATORS PURSUANT TO THE PROVISIONS OF ASSEMBLY BILL 240 (2019).

WHEREAS, Carson City Municipal Code Section 18.12 requires the Board of Supervisors of Carson City to establish a fixed number of residential building permit allocations on a two-year rolling basis, to establish the number of residential building permit allocations available within the Development Project and General Property Owner categories, and to establish a maximum average daily water usage for commercial and industrial building permits as a threshold for Growth Management Commission review in order to manage growth within Carson City; and

WHEREAS, pursuant to Carson City Municipal Code Section 18.12 the Growth Management Commission met in a duly noticed public hearing on May 27, 2020, and recommended the maximum number of residential building permits to be made available for calendar years 2021 and 2022, and the Commission estimated the maximum number of residential building permits for calendar years 2023 and 2024; and

WHEREAS, the Board of Supervisors finds and declares pursuant to Carson City Municipal Code Section 18.12 that city water and wastewater treatment capacity, as well as other resources identified in Section 18.12.050(2), are essential resources that limit the available residential building permits authorized by this resolution.

NOW, THEREFORE, the Board of Supervisors hereby resolves:

- 1. Beginning on the first city working day in January 2021, the Building Division shall make available a total of **672** residential Growth Management allocations for building permits. The 2020 year-end balance of unused allocations shall be voided and returned to the utility manager. The allocations for residential building permits shall be disbursed as follows:
- (a) For the general property owner category, a subtotal of **289** residential permits (43% of total residential building permit allocation). A property owner may apply for a maximum of 30 residential building permits in Period 1 (January through March 2021) subject to the availability of building permits.
- (b) For the <u>development project category</u>, a subtotal of **383** residential building permits (57% of total residential building permit allocation). Individual development projects qualified

for inclusion on the project list shall be entitled to apply for an equal share of building permits during Period 1 based on the number of qualified development projects that have applied to the Building Division for development project status as of the first City working day in January 2021. Where a development project has less lots or units than the total share of building permits allocated to it, the remaining building permits shall be distributed equally among the remaining development projects. Additional development projects may be added to the list during Period 1 and use any remaining building permits. If no additional permits are available in Period 1 in this category, development projects not on the list at the beginning of Period 1 may only apply for building permits from the general property owner category during Period 1 in accordance with the limitations set forth above and may be added to the development category anytime during Period 2 (April through June).

- (c) Any residential building permits remaining from Period 1 shall be made available in Periods 2 (April through June) and 3 (July through December) in accordance with Carson City Municipal Code Section 18.12.055.
- 2. Beginning on the first city working day in January 2022, the Building Division may upon Board of Supervisors' approval make available pursuant to Carson City Municipal Code Section 18.12 a maximum total of **692** residential building permits, assuming three percent growth occurs in 2021. The building permits shall be disbursed as follows:
- (a) For the general property owner category, a subtotal of **297** residential building permits may be made available. General property owners shall be entitled to apply for a maximum of 30 residential building permits in Period 1 subject to the availability of building permits.
- (b) For the <u>development project category</u>, a subtotal of **395** residential building permits may be made available. Development projects qualified for inclusion on the project list shall be entitled to apply for building permits in accordance with paragraph 1(b), above.
- (c) Any building permits remaining from Period 1 shall be made available for Periods 2 and 3 in accordance with Carson City Municipal Code Section 18.12.
- 3. For calendar year 2023, it is estimated that the Board of Supervisors may make available a maximum of 712 residential building permits, assuming continued three percent growth.
- 4. For calendar year 2024, it is estimated that the Board of Supervisors may make available a maximum of 734 residential building permits, assuming continued three percent growth.
- 5. Pursuant to Carson City Municipal Code Section 18.12, prior to issuance of building permits, any commercial or industrial projects proposed in 2021 that exceed the threshold of **15,000** gallons per day water usage must have the Growth Management Commission's review and approval to assure water availability.
- 6. Any building permits made available by this resolution shall be subject to all of the requirements of Carson City Municipal Code Chapter 18.12 (Carson City Growth Management

Ordinance).

- 7. This resolution supersedes all prior resolutions establishing growth management allocations and shall have the full force and effect of law and be incorporated by this reference into Carson City Municipal Code Chapter 18.12.
- 8. This Resolution and the Growth Management staff report to the Board of Supervisors from the meeting of July 2, 2020, shall be forwarded to the State legislators representing the City in accordance with Assembly Bill 240 (2019).

Upon motion by Supervisor foregoing Resolution was passed an vote:	or, seconded by Supervisor, the d adopted this day of, 2020 by the following
VOTE: AYES:	
NAYS:	
ABSENT:	
ATTEST:	ROBERT L. CROWELL, Mayor
AUBREY ROWLATT, Clerk-Reco	order

STAFF REPORT FOR THE GROWTH MANAGEMENT COMMISSION MEETING OF MAY 27, 2020

FILE NO: GM-2020-0001 AGENDA ITEM: F-5

STAFF CONTACT: Lee Plemel, AICP, Community Development Director

AGENDA TITLE: For Possible Action: Discussion and possible action regarding a recommendation to the Board of Supervisors for a Resolution establishing the maximum number of residential building permit allocations under the Growth Management Ordinance for the years 2021 and 2022 and estimating the maximum number of residential building permits for the years 2023 and 2024; establishing the number of building permit allocations within the Development and General Property Owner categories; and establishing a maximum average daily water usage for commercial and industrial building permits as a threshold for Growth Management Commission review.

STAFF SUMMARY: The Growth Management Commission is required to make annual recommendations to the Board of Supervisors to establish the number of residential permits that will be available for the following calendar year. This has historically been based upon a maximum growth rate of three percent. The commercial and industrial daily water usage threshold is 15,000 gallons per day annual average in 2020, above which Growth Management Commission approval is required.

PROPOSED MOTION: "I move to recommend to the Board of Supervisors approval of a maximum of 672 residential building permit entitlements for 2021, and to continue the commercial and industrial development annual average water usage threshold of 15,000 gallons per day for Growth Management Commission review, and including distributions and allocations for future years as further provided in the draft Board of Supervisors Resolution."

BACKGROUND:

The Planning Commission serves as the Growth Management Commission per the Carson City Municipal Code Title 18, Chapter 18.12 (Growth Management Ordinance). The Growth Management Commission is responsible for annually reviewing the information provided by various City departments and outside agencies and for submitting a recommendation to the Board of Supervisors to:

- 1. Establish a fixed number of residential building permits to be made available in the following two calendar years (2021 and 2022, on a rolling calendar basis) and estimate the number to be made available in the third and fourth years (2023 and 2024).
- 2. Establish a distribution of the total building permit entitlements between the "general property owner" and "development project" (31 or more lots or units) categories.
- 3. Establish a maximum average daily water usage for commercial and industrial building permits as a threshold for Growth Management Commission review.

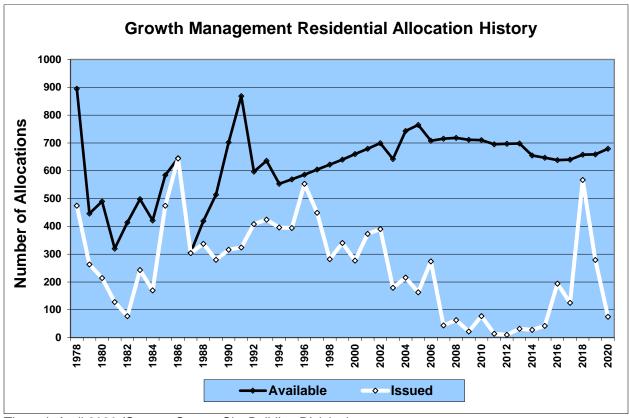
Section 18.12.050 (Purpose) of the Carson City Municipal Code, Growth Management Ordinance, states, in applicable part:

2. The board declares that the following essential resources shall be considered for the managed growth of Carson City:

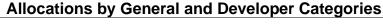
- a. City water: quantity, quality, supply, capacity, infrastructure;
- b. City sewer: treatment and disposal capacity; system or infrastructure ability to transport sewage from a residential dwelling unit of the treatment system;
- c. Sheriff protection services;
- d. Fire protection services;
- e. Traffic and circulation;
- f. Drainage and flooding;
- g. School enrollment and capacity;
- h. Parks and recreation; and
- i. Other resources or services as determined by the board.

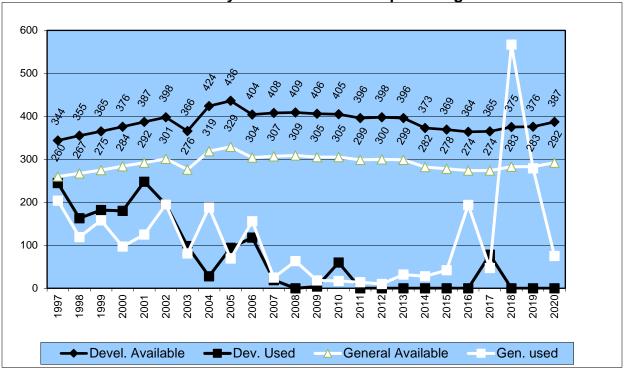
The Growth Management Ordinance was originally implemented in the late-1970's to address the City's ability to provide the necessary water and sanitary sewer infrastructure to keep pace with growth occurring at that time. For most of the Growth Management program's history, the total number of building permit entitlements in a given year has been roughly based upon a maximum growth rate of 3%. Entitlements have historically been allocated between the "general property owner" and "development project" (owners/developers with 31 or more lots/units) categories in a 43%-57% split, respectively, for the first allocation period (January through March—see Attachment D for the detailed distribution by category).

The following graphs provide historical data regarding the number of permits available, the total number of permits used, the number of permits used by the general property owner and development categories, and permits used by type of residence.



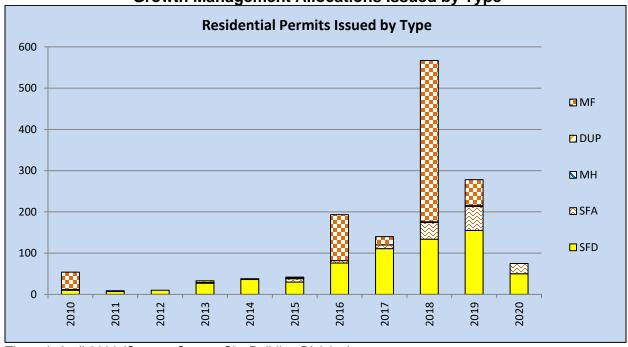
Through April 2020 (Source: Carson City Building Division)





Note: Available allocations by category are for Period 1 only (January through March)

Growth Management Allocations Issued by Type



Through April 2020 (Source: Carson City Building Division)

SFH – Single Family Detached

DUP – Duplex

SFA – Single Family Attached MH – Mobile Home MF – Multi-family attached (3+ units, single ownership)
Conv – Conversion of existing unit from well to water system

Historic Averages and Maximums

	Average issued/yr.
1990-2019 (30 years)	242
2000-2019 (20 years)	168
2010-2019 (10 years)	137
2015-2019 (5 years)	241

Maximum number issued in last 30 years: 567 in 2018.

DISCUSSION:

In addition to addressing annual growth management allocations, this report is intended to serve as the annual report for Carson City pursuant to paragraph 2 of Section 1 of Assembly Bill (AB) 240, adopted by the Nevada Legislature in 2019, which requires:

On or before December 31 of each calendar year during the period between July 1, 2019, and December 31, 2022, each county in the region, in consultation with any cities within each such county, shall prepare and submit to each Legislator who represents any portion of the county a separate report that:

- (a) Identifies issues relating to the orderly management of growth in the county, including cities within the county, and the region, including, without limitation, issues in the following areas:
 - (1) Conservation, including, without limitation, the use and protection of natural resources:
 - (2) Population, including, without limitation, projected population growth and the projected resources necessary to support that population;
 - (3) Land use and development;
 - (4) Transportation; and
 - (5) Public facilities and services, including, without limitation, roads, water and sewer service, flood control, police and fire protection, mass transit, libraries and parks.
- (b) Makes recommendations regarding those issues.

Assembly Bill 240 applies to and requires cooperation between Carson City, Douglas County, Lyon County, Storey County, Washoe County, and the cities of Reno and Sparks regarding regional growth. The bill requires these entities to submit a report to the State Legislators representing their jurisdictions by December 31 each year through 2022.

The Planning Division has solicited comments from various City departments, the Carson City School District, Carson Tahoe Hospital, and various agencies regarding their ability to accommodate growth within Carson City and, if applicable, what limits should be set on the issuance of residential permits for 2021. Written comments received are attached to this staff report.

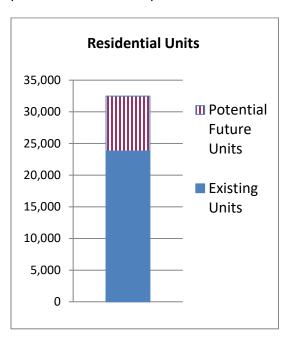
Though City departments continue to note limitations in their ability to accommodate City growth at current resource levels, no City Department comments include a recommendation to reduce the number of residential permits to be made available in 2021. The Board of Supervisors continues to incrementally address City staffing and service needs as revenues continue to recover from recession levels. Refer to the attached department and agency comments for more detail.

The Planning Division annually provides various informational data for the Commission's and Board of Supervisors' review and consideration in determining the number of residential allocations that will be made available, as well as the average daily water usage threshold for Growth Management review. The following information is provided for consideration.

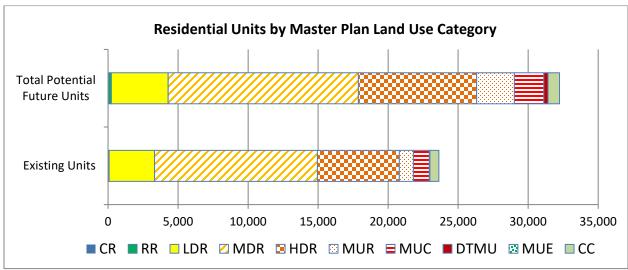
Carson City "buildout" capacity

As noted in the 2019 Growth Management report, the City has moved toward a parcel-based model for a water capacity analysis of how much growth the City can accommodate while staying within its allocated water resources. In 2019, the Public Works Department conducted a water capacity analysis assuming the entire City is developed to its maximum capacity based on current Master Plan land use designations and zoning. It included residentially designated parcels being developed to their maximum potential densities and commercial and industrial parcels being fully developed. This analysis concluded that Carson City has the allocated water resources to accommodate buildout in accordance with current Master Plan and zoning. This parcel-by-parcel analysis will also allow the City to continue to monitor how proposed changes in land use or actual water usage over time impacts the long-range forecast for water capacity. See the written comments from Public Works regarding water resources for more details on the latest information.

Carson City has approximately 23,820 existing residential units. Assuming all currently approved developments are completed at their proposed densities and all lands designated for residential uses are developed or redeveloped to the maximum densities, an additional 8,660 residential units could be developed for a total of approximately 32,480 residential units. (For example, for an existing 2-acre parcel zoned for a 1-acre parcel size with one house currently on the parcel, it is assumed that an additional dwelling unit could be developed on that property.) It is estimated that 32,480 residential units would result in a population of approximately 81,200 (using 2.5 residents per dwelling unit). This maximum density was assumed for the purposes of the water capacity analysis, though it is unlikely that all existing parcels will be developed to their maximum capacity.



The following chart shows existing and total potential residential units by the Master Plan land use designation in which the properties are located.



Key:

CR – Conservation Reserve (private lands)

RR - Rural Residential

LDR – Low Density Residential

MDR - Medium Density Residential

HDR – High Density Residential

MUR – Mixed-Use Residential

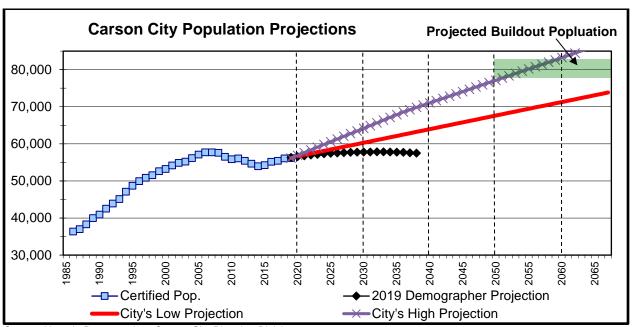
MUC – Mixed-Use Commercial

DTMU – Downtown Mixed Use

MUE – Mixed-Use Employment

CC - Community Commercial

The following table shows population projections provided by the State Demographer as well as projections used by Carson City for long-range planning purposes. The City uses these projections for long-range regional transportation plans, and water and sewer capacity planning. For planning purposes, Carson City is anticipating average long-term growth of approximately 0.7%-1.3%.

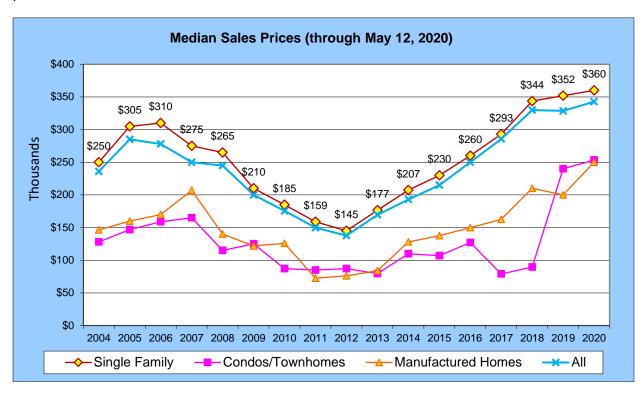


Source: Nevada Demographer; Carson City Planning Division

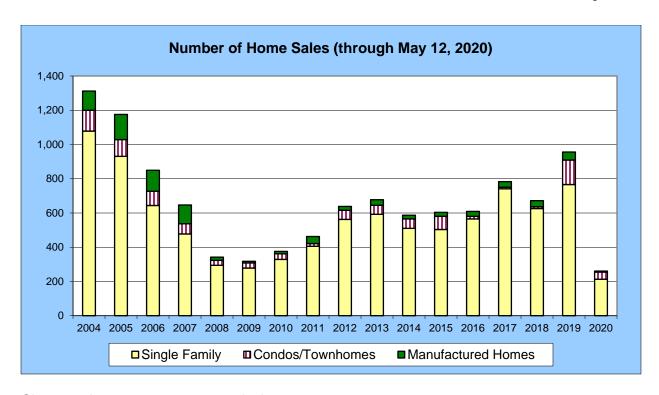
Attachment C shows various subdivisions and multi-family residential projects with current approvals for development. A Growth Management allocation will ultimately be required for each of these units as well as for other residential units constructed throughout the City. Note that these subdivisions and approved projects do not necessarily represent all the projects that will be developed within the next few years. Some of these projects (e.g. Lompa Ranch) will take 10 years or more to develop, while other unknown projects may be approved and added to the list as new applications are received. The associated Growth Management allocations for each residential unit would correspondingly be spread out over time.

Housing sales trends

The number of home sales and sales price, as well as many other factors, can have an impact on the demand for construction of new homes. The following charts show median home sales price and sales volume trends.



As the above graph shows, the median sales price of housing has continued to rise for the seventh straight year in 2019, and early 2020 sales show a continued increase in median home price. An affordable home for a family with a household income of \$50,000—approximately the median household income in Carson City—would be approximately \$250,000. Of the 956 total homes that were sold in 2019, 19% (182) were sold for \$250,000 or less (18% were \$250,000 or less in 2018). Of the 766 single-family detached homes (non-condo/townhome and non-manufactured homes) sold in 2019, 9% (66) were sold for \$250,000 or less (12% in 2018). Of the 143 townhomes and condominiums sold, 52% (74) were sold for \$250,000 or less, and 89% (42) of the manufactured homes (real property) that were sold in 2019 were \$250,000 or less.



City capacity to process 672 permits in one year

The building permit center is an "enterprise fund," meaning it uses revenues directly generated by permits to fund the permit center functions. When more permits are submitted, this immediately generates revenues that can be used to ensure that appropriate staff is hired to handle the permit processing workload. This includes funding the time for staff in the Community Development, Public Works, Fire, and Health Departments to review and inspect building permit plans. Staffing levels for building permit reviews and inspections have been increased over the last several years to handle the increase in permitting activity, including an increase in non-residential construction.

Some City departments have noted that they cannot accommodate growth while maintaining current levels of service at existing staffing and resource levels. This is especially of concern given recent events that will likely cause a significant reduction of City revenues in 2020. However, the construction and community growth would also bring additional City revenues to be able to pay for additional resources to meet the growth demand. Significant growth in the residential sector of the economy would be an indicator that the overall economy is strong, which would also result in additional City revenues. It should also be noted that there would be a delay of a few months between the issuance of a building permit and the completion and occupancy of a residence, delaying the associated population growth impacts.

Determination of annual number of available allocations

The Growth Management Ordinance does not specify how to determine the number of allocations that should be made available each year, only that "essential resources" must be considered in determining that number. For most of the Growth Management Ordinance's history, a general rule of allowing up to 3% growth has been used.

Various methods of determining the exact number of allocations to be made available have been used over the program's history, resulting in a wide range of allocation maximums over the years, particularly before 1992. Unused allocations were carried over to the following years during a certain period, with adjustments made every few years. During a period in the 1990's, the available allocations were increased by 3% each year, even though actual population growth was occurring at a slower rate during that same period. The Growth Management files from prior to 2006 do not indicate the exact methodology used in determining the number of allocations.

In 2006, the current method of determining the number of allocations was established. This method uses the most recent available State Demographer population estimates for Carson City (usually one year behind the current year) as the base for establishing the number of permits that would, in theory, result in 3% growth. This method also uses the latest available Census data for the average number of persons per household (2.54) to calculate the allocations. The details of the methodology used in determining the recommended allocations for 2020 are included in Attachment E. The methodology has been included in each report since 2006 to establish a consistent method that can be tracked through time.

While the ordinance requires establishing the number of allocations to be made available in the second year and estimating the number for the third and fourth years, the ordinance also requires that these numbers be evaluated and set annually. Therefore, if certain service capacity issues arise in any given year, the estimated number of allocations for future years can be adjusted. Also, the number of allocations can only approximate how much actual growth will occur in the City. For example, the State Demographer estimated that the City's population decreased slightly through the recent recession years, primarily due to employment impacts, even though new residential units were constructed during that time. Potentially, the City could see an actual growth rate of more than 3% in any given year even though all of the available residential allocations are not used.

The Growth Management program was developed in response to a moratorium by the State Division of Water Resources on new subdivisions in Carson City in the 1970's due to wastewater and water capacity issues. The program was developed in cooperation with the State to address their issues. Those specific issues were addressed by the City years ago.

With numerous approved projects potentially starting construction soon, it is possible that the proposed limit of residential permits could be reached in 2021 and 2022. However, many in the building industry continue to believe that other limiting factors will not allow the building industry to construct more than 672 units this year or next year. Allocation used in 2018 were notably higher than in recent years primarily due to one apartment complex (Carson Hills) taking permits for 370 units. Those units are still under construction and are expected to be completed in 2020.

Even during times of slow growth when there are no apparent, imminent capacity issues, staff believes the program should remain in place, in part, to stay in good standing with the State on water- and wastewater-related issues. The current potential growth and development pressures emphasize the need to continue the Growth Management program so that the impacts of residential growth can continue to be monitored and appropriately limited.

Growth impacts on the Carson City School District

"School enrollment and capacity" is one of the essential City resources that must be considered as part of the Growth Management allocation process. As growth occurs in the City and within

the School District, the School District must continue to increase overall capacity to meet its educational responsibilities.

Comments from the School District are included in Attachment A. The School District notes that some of its facilities are currently at or over capacity. City Planning Division staff participates in regular meetings with the School District's bond oversight committee to inform the School District of upcoming residential developments and help them anticipate future school needs.

Commercial and Industrial Average Daily Water Usage Threshold

The Commission is also required to establish the average daily water usage threshold for Growth Management Commission review. A threshold of 15,000 average gallons per day was adopted in 2016, up from 7,500 gallons that was used for years prior to that. To give an idea of how much water this is, 7,500 gallons per day is approximately the average amount used by a large restaurant, including landscape irrigation. With recent and continued improvements to the water system and additional water resources being produced and delivered from the Carson Valley, Public Works staff recommends retaining the average daily water usage threshold for Growth Management review at 15,000 gallons.

In addition to the water infrastructure improvements, the City's development standards and building codes have improved over the years to where water conservation measures, such as low-flow fixtures, are included as part of the standard requirements for new commercial and industrial development. The Public Works Department has the ability to require improvements with building permits that are necessary to meet water demands for each project without Growth Management Commission review. Furthermore, the Public Works Department will continue to use the recently completed water capacity analysis to monitor the impacts of each development individually and in aggregate for the long-term impacts to water capacity.

ALTERNATIVES AND CONCLUSION:

Per the Growth Management Ordinance, the Growth Management Commission must recommend the total number of available permits and the distribution between categories for the years 2021 and 2022 and recommend an estimated number of total permits available for 2023 and 2024. A distribution of 43% to the "general property owner" category and 57% to the "development project" category has historically been established and is recommended by staff to continue. The table below shows allocation alternatives for various growth rates and how these rates would affect the number of available allocations.

Permit Allocation Alternatives

1 of the Amount of Accordances							
Rate	Category	2021	2022	2023	2024		
3.0%	Total	672	692	712	734		
	General	289 (43%)	298 (43%)				
	Development	383 (57%)	394 (57%)				
2.5%	Total	560	574	588	603		
	General	241 (43%)	247 (43%)				
	Development	319 (57%)	327 (57%)				
	Total	448	457	466	475		
2.0%	General	193 (43%)	196 (43%)				
	Development	255 (57%)	261 (57%)				

Carson City has historically based the number of available permits in a given year on allowing a maximum growth rate of 3%. Note that future allocation estimates assume a continued actual

growth rate of 3% and are adjusted each year based on actual estimated population growth figures—i.e. actual growth of less than 3% would result in fewer allocations in future years.

Staff recommends continuing the allocation system based upon a maximum growth rate of 3%. Refer to Attachment D to see how the allocations would be distributed throughout the year per the requirements of the Growth Management ordinance. The recommended allocation would allow the maximum flexibility in providing building permits as new development occurs, though longer-term growth is expected to continue on a moderate pace. Unnecessarily limiting the number of building permits could have a negative impact on the ability of developers to obtain financing for proposed developments and have a generally suppressive effect on the Carson City economy. Should a lower limit actually limit developers to increase the housing supply to meet market demand, it could also reduce the affordability of housing in Carson City.

Please contact Lee Plemel in the Planning Division at 283-7075 or lplemel@carson.org if you have any questions regarding the Growth Management program.

Attachments:

- A) Agency comments
- B) Draft Resolution
- C) Approved Developments Map
- D) Building Permit Distribution Table for 2013 (3%)
- E) Methodology, Number of Available Permits



CARSON CITY NEVADA Consolidated Municipality and State Capital PUBLIC WORKS

MEMORANDUM

TO: Carson City Planning Commission

FROM: Darren Schulz, Public Works Director

DATE: May 11, 2020

SUBJECT: Growth Management Report 2020

Thank you for the opportunity to inform you of the status of our operations and our ability to serve Carson City at a projected growth rate up to 3% through 2020.

The operational reports are as follows:

WATER OPERATIONS:

Carson City's existing usable water rights are 18,648 acre-feet per year.

Carson City must allocate approximately 2,565 acre-feet to remaining approved undeveloped lots. As required by the State Engineer's Office, additional parceling is also being accounted for. It is estimated that in 2020, Carson City's water usage will be approximately 9,687 acre-feet. This number includes State, commercial and industrial usage.

Subtracting the predicted 2020 water usage of 9,687 acre-feet and outstanding water commitments of 2,565 acre-feet from Carson City's usable water rights of 18,648, leaves a balance of approximately 6,396 acre-feet, which may be allocated towards new development.

Carson City continues to utilize conjunctive use water management. Carson City fulfills its annual water demands from approximately 75% groundwater and 25% surface water sources. Through conjunctive resource management, Public Works operates the water system so Carson City's needs are met through a combination of groundwater and surface sources, making the best use of the water resource available. The goal of conjunctive management is to maximize surface water when available to allow the groundwater aguifers to rest.

Carson City will continue the outside water management program during the 2020 irrigation season, which includes a THREE-DAY-A-WEEK schedule where odd-numbered addresses water on Tuesday, Thursday and Saturday and even-numbered addresses water on Sunday, Wednesday and Friday, with no watering between the hours of 10:00 a.m. to 6:00 p.m. Watering on Mondays is prohibited. This allows time for resting of the system and filling of tanks.



CARSON CITY NEVADA Consolidated Municipality and State Capital PUBLIC WORKS

State Engineer's Order 1140 allows Carson City to pump additional Eagle Valley groundwater during drought years. This allows Carson City to pump a maximum of 11,700 acre-feet from the Eagle Valley ground water basin for a one-year period provided that the average ground water pumped from Eagle Valley over a period of five consecutive drought years will not exceed 9,900 acre-feet annually.

Carson City has built up an additional water rights bank account not included in the total usable water rights number in the previous paragraphs since 2006, through its managed Aquifer Storage and Recovery program within Vicee Canyon recharge basins. The total number of water rights banked under the recharge permit is approximately 5,300 acre-feet, to be able to be used in an emergency basis.

Carson City has always used a drought as the design scenario to meet peak summer demands. Currently, there is approximately 24 million gallons per day (MGD) of production supply for a drought year. The maximum-day demand from 2010 to 2019 was approximately 20 MGD. There is approximately 4 MGD of peak supply capability remaining.

Carson City Public Works can accommodate the projected 3% growth for the remainder of 2020 through 2021, dependent on the completion of the planned capital improvement projects regarding storage, treatment, distribution and production facilities.

With regards to the threshold for Growth Management review, we recommend to keep the threshold at 15,000 gallons per day.

WASTEWATER OPERATIONS:

The Water Resource Recovery Facility (WRRF) is permitted to process a sewage flow of 6.9 million gallons per day (MGD) averaged over a 30-day (monthly) period. The 2019 maximum monthly average flow was 5.7 MGD. With respect to the planned growth, a potential development rate of 3% through 2021 could be accommodated by the WWRF and wastewater operations.

LANDFILL OPERATIONS:

The Landfill has a projected life expectancy of approximately 34 years. With respect to the planned growth, a potential development rate of 3% through 2020 could be accommodated by the Landfill.

TRANSPORTATION:

The Carson City Public Works Department is responsible for the construction and maintenance of the City's street network as well as bicycle and pedestrian facilities. Additionally, the City operates a public transit system. The City also works closely with the Nevada Department of Transportation, which owns and operates State highways in the City. The State-owned roads include the Carson City Freeway, which connects U.S. 395 at U.S. 50 (Spooner) to Reno.



CARSON CITY NEVADA Consolidated Municipality and State Capital PUBLIC WORKS

With respect to the planned growth of the City and how that may be expected to impact the City's transportation system, anticipated increased traffic volumes anticipated to result from the potential development rate of 3% through 2020 could be accommodated by the existing and planned transportation system. Although increased traffic volumes are expected to be accommodated with existing roadway capacity, roadway maintenance activities continue to operate in a deficit. Consequently, the long-term condition of the City's roadways will continue to deteriorate unless or until the funding gap is reduced.

Public Works' staff, who serve both the Carson City Regional Transportation Commission (CCRTC) and the Carson Area Metropolitan Planning Organization (CAMPO), are familiar with the current system, the improvements that are planned to be implemented by the year 2021, and the planned improvements through the year 2054. With this knowledge, we have determined that the current system is operating well with respect to capacity. Certain areas of Carson City have increased the pace of development. These include Southeast Carson City, Central Carson City near 5th Street, and William Street coming into Carson City off the I-580 freeway. As development occurs, staff must be mindful of project impacts to the transportation system and ensure fair and appropriate mitigation measures are implemented.

One of the important tools available for these evaluations is a travel demand model developed and maintained as part of CAMPO responsibilities. This model, based on existing and forecasted land use and socio-economic data developed in cooperation with the Carson City Planning Division, is currently being updated to forecast traffic volumes to the year 2054. This update is in preparation for CAMPO's development of the 2050 Regional Transportation Plan. The model was updated and extended in 2019 and is again undergoing maintenance and improvements to account for ongoing local development projects and external regional growth. This model allows for evaluations of the impacts of changes in the land use base, the transportation network, or both. The model will be used to support subarea analyses and to identify long-term critical infrastructure needs.



911 E. Musser St. Carson City, NV 775-887-2500 Fax: 775-887-2026

April 27, 2020

Mr. Lee Plemel
Community Development Director
Carson City Planning Division

Mr. Plemel,

The Sheriff's Office is providing input to the "Growth Management of 2021 Residential Permit Allocations and AB 240 (2019) Growth Management Report to State Legislators" as you've requested. The information below is provided based on approximately the last 10 years of data collected, except where otherwise noted.

General Staffing Conditions:

- Sheriff's Office Sworn Staff: 100 Sworn
- Patrol Division: 53 Deputies & 1 Civilian (2 Deputies in whole or part grant funded)
 - o Includes 5 Deputies to Traffic Management, and 5 Deputies to Schools
- Detention Division: 31 Deputies & 5 Civilians
- Investigations Division: 13 Deputies & 4 Civilians (2 Deputies assigned to state or federal Task Forces, and 1 Deputy partially grant funded)
 - Unit includes 5 assigned to Special Enforcement/Gangs
- Communications Division: 20 Civilians
- Civil/Records Division: 7 Civilians

Note: This list is not all inclusive of part time employees.

Significant manpower/labor shortages are existing in the Detention and Communications Divisions.

In response to department recommendations specific to your request, the below is provided:

- 1. Does your department or agency have any extraordinary service capacity issues that would be negatively impacted by residential growth in 2021-2022? If so, identify the issues. **RESPONSE:** None for the period identified.
 - a. Manpower/Labor shortages resulting from unfunded external mandates in the Detention Center are being addressed within local budgetary allowances (Inmate pre-release program).
 - b. <u>Critical</u> Manpower/Labor shortages at the Public Safety Communications Center are being addressed within the local budgetary allowances.
- 2. Do you recommend limiting the number of residential building permits (new construction) that will be made available for the 2021 calendar year to address these issues? If so, what limit, and how will this limit on residential growth help resolve your service capacity problem? **RESPONSE:** None for the period identified.

3. What are your recommendations to solve any service capacity issues identified above? **RESPONSE**: **None for the period identified.**

In response to Growth Management, Purpose, of the Boards findings and declarations, the individual unit breakdowns concerning the overall conditions for Public Safety, Law Enforcement, in the community are provided for consideration:

Major Sheriff's Office Key Growth Indicators:

- Overall Crime Index: Continued crime reductions rates through 2019 (lowest over 10-year period.
- Emergency Response Times: This key indicator is holding steady at approximately 50% of the time capable of the goal of a 6-minute response time from initial ring at dispatch to the first patrol arriving on scene. In greater than 95% of calls, Deputies report on scene within 6 minutes, 40 seconds.
- Traffic Management: Accident occurrence rates peaked in 2019 over the 10year period. Some improvement has been seen on the monthly recent rates (not associated with Covid-19 responses).
- **Sheriff Call Volume**: Call volume is steadily increasing over the most recent years. Call volume for 2019 increased 2% over 2018, 14% over 2017, and 11% over 2016.
- **Detention Bookings**: Total Bookings in the Detention Center are holding steady, both over the long and short-term periods.

Public Safety Communications Division:

- Annual telephone call volume increasing at a rate of approximately 1650 calls per year. <u>Staffing levels at the Communications Center has reached critical levels.</u>
- 911 Incoming Calls holding steady between 25,000 and 30,000 per year
- Computer Aided Dispatch labor distribution (law) holding steady at 100,000 to 125,000 per year. Significant increases are related to medical activity.

Sheriff's Patrol Division:

- Calls for Service have held steady over 10-year period at 15,000 to 20,000.
- Traffic Accident rates were steady at 400 to 500 per year until approximately 2016 and peaking in 2019 at 650 per year (est. 30% increase in activity/labor). Bulk of accidents reports are non-injury accidents, which have increased steadily since 2014 from 200 to 500 annually.
 - Full time traffic enforcement was funded by the Board of Supervisors in 2018 (implemented in spring of 2019).
- School Activities have held steady at 2,250 to 2,500 calls for service annually. There is no indication of considerable student population growth in the near future, however, densely populated environments (Carson Middle School and Carson High School) continue to draw the heaviest volume of activities.
 - Note: School response calls for service have held steady at 200-300 per month since inception of the School Resource Officer program.
- Outside Agency Assistance has more than doubled in the past 5 years and expected to continue to grow. Current assistance calls are holding at 1,200 to 1,400 per year.

Coroner's Office:

- Coroner's Office continues to hold steady over the 10-year period recording 300 to 350 deaths per year.
- Deaths related to suicide and/or drug related show an unremarkable change.

Detention Division:

- Total Bookings at the Detention Center appear to be holding steady at 2,500 to 3,000 per year, with peak years at 3,500.
- Average Daily Population (all inclusive) is estimated at 66% capacity. However, during the period examined, the Sheriff's Office increased the jail capacity 22%; therefore, the average daily population to Original Construction Capacity is at 82%. Capacity levels greater than 80% of original construction should be considered to exceed critical health, safety, welfare capabilities and necessitate additional staffing considerations.

Civil/Records Division:

 No remarkable increases or decreases in overall workload indicators have been seen over the previous 10-year period.

Conclusion: Immediate and short-term abilities for the law enforcement sector to maintain quality services should be assessed to be "good". While the Officer to Population Ratio continues to be significantly below the statewide average, as well as the regional average, the department has done well at keeping up with the community demand. Concerns for long-term abilities rests in the more rural environments of the community, including the western Lake Tahoe (recreational) region, and the eastern housing growth areas along the Carson River front.

Additional long-term considerations must be given to specific groups that have an impact on growth & law enforcement services:

- Homeless & Transient Population growth
- Mental Health & Crisis Intervention, and Services growth
- Congested Population Affordable Apartment style housing construction

All three of these conditions are determined to be having significant impacts on law enforcement and public safety services. Continued growth of these conditions would easily overwhelm current staffing postures, resource availabilities, and could negatively impact current growth projections.



CARSON CITY, NEVADA CONSOLIDATED MUNICIPALITY AND STATE CAPITOL

To:

Lee Plemel, Community Development Director

From:

Jennifer Budge, CPRP, Parks and Recreation Director,

Subject:

Growth Management Impacts on Parks and Recreation Services

Date:

May 19, 2020

Thank you for providing the opportunity to comment and provide feedback on the Growth Management Plan. With an anticipated population growth rate of 3%, there will be a need to increase service levels provided by the Parks, Recreation and Open Space Department for Carson City residents. As new subdivisions are constructed, additional neighborhood parks will be contemplated consistent with the City's Park Master Plan, and the desire for additional trail connectivity, as outlined in the Unified Pathways Master Plan. While new neighborhood parks can be funded through Residential Construction Tax (RCT) as outlined in Nevada Revised Statutes, RCT doesn't generate enough funds to adequately construct parks without a significant contribution from developers to supplement the RCT. Partnerships between the City and developers will be critical to ensure creative outdoor recreation spaces and trails can be incorporated throughout the City. Unfortunately, RCT is not a sustainable funding source, as it does not contribute to deferred maintenance and infrastructure preservation needs. Efforts to update the City's Park Master Plan and limit the number of new parks within the City, while reinvesting/reimagining existing parks should be emphasized whenever possible, in cooperation with the development community.

Increased growth will also contribute to the need for additional recreation facilities, especially athletic fields. The lack of sufficient athletic fields represents one of our most serious service challenges. To accompany the demand for field use from local youth and adult sports is an increasing trend in traveling sports tournaments, which positively contributes to the City's economic vitality. Creative partnerships with the Cultural and Tourism Authority, Youth Sports Association and others can help supplement City resources to meet the recreational demands of this growing community. There is also a need for additional recreation facility diversity such as dog parks. A large-scale interactive splash/spray park is desired and is a model for a financially self-sustaining operation, as demonstrated throughout other Northern Nevada park systems. Should the growth occur, it is encouraged to focus on buildout of existing parks such as Pete Livermore and Centennial Sports Complexes, while rehabilitating and reimagining aging facilities, like Mills Park, rather than acquire additional land inventory.

It is recommended to not limit residential permits, as it would be counterproductive toward continued economic recovery and growth, while providing much needed job creation. This is subject to a sustainable maintenance program for new parks and recreation facilities. Maintenance and infrastructure preservation should be 100% funded by Homeowners or Maintenance Associations (HOA), with a Landscape Maintenance District (LMD) as a secondary measure, to not require funding from the city's general fund. Maintenance endowments are also recommended for new projects that require wetland mitigation or labor-intensive natural resource management. While the City already has more parks per capita than the national average, the Department operates at approximately 64-acres of parkland per park maintenance worker. HOA's and LMD's are a creative, sustainable alternative to ensure maintenance of new facilities, while not further impacting existing staffing levels.



Additional growth in parks and recreation will also have impacts to the community's water system. Efforts should be made to reduce turf, incorporate low impact development best management practices, utilize artificial turf, install recycled water systems, and utilize reclaimed/effluent water resources whenever possible.



TO: Lee Plemel, Community Development Director

FROM: Tod Colegrove, Library Director

DATE: 11 May 2020

RE: Growth Management – Impacts on the Carson City Library

Thank you for the opportunity to provide input for the annual Growth Management report. Please see the responses below.

1. Does your department or agency have any extraordinary service capacity issues that would be negatively impacted by residential growth in 2021-2022? If so, identify the issues.

The Carson City Library is proud to serve the community. It has been and remains an anchor resource as our city has changed over the years. The effects of the Great Recession took a great toll on the library and it suffered reductions in staff with no recovery of any of the positions lost.

Use of grant and private funds drove the addition of labor-saving materials handling units, self-service stations, and set up creative designs to maximize use of the library square footage for the city's growing population. Adding a full complement of electronic/digital resources, technology devices (in-house and for check-out) and the only community makerspace has also allowed the library to improve resources and services to the library users; however, the library building is at capacity for services and materials with no options to add books stacks or programming space. Individual and group workspace and places to just sit and read are very limited.

Carson City Library staff is the key factor that has allowed the library to keep up with demand for in-house technology, resources and services. The Library Board and staff are forward thinking and strive to bring the most relevant, creative resources and services to our growing community. Family story times on Thursday mornings now must have two sessions in order to welcome all the interested parents and children and a third might be needed. Increased growth will put additional pressure on programs like this one and also on books, audio-visuals, technology and other programs and services used at the library.

2. Do you recommend limiting the number of residential building permits (new construction) that will be made available for the 2021 calendar year to address these issues? If so, what limit, and how will this limit on residential growth help resolve your service capacity problem?

The Carson City Library does not recommend a limit on residential building permits.

3. What are your recommendations to solve any service capacity issues identified above?

Supporting additional staff for digital/technology literacy and advancement will serve to support the whole community and combat the digital divide. A plan to review and assess the library's space needs will guide the best options for the community. The library will continue to review resources, seek grants and partnerships to optimize and reimagine operations and staff to bring the best, most relevant and forward thinking library services within its current limits.



CARSON CITY FIRE DEPARTMENT

"Service with Pride. Commitment. Compassion"

May 19, 2020

Lee Plemel, Planning Director Carson City Planning Division Carson City Planning Commission 108 E. Proctor St. Carson City, NV 89701

Dear Lee and Commission Members,

The mission of the Carson City Fire Department is to serve the community with pride, commitment, and compassion.

The fire department is experiencing an increase in call volume of approximately 5% per year. This call volume growth has occurred with very slow population growth in the City. With the current growth rate of emergency responses, and no additional resources to meet the demand, Carson City Fire will be challenged to provide the same excellent service we provide today. The fire department is becoming more reliant on our mutual aid partners to meet the increase in emergency responses.

As the population in Carson City grows, we expect the annual call volume to increase at a greater rate than what we are currently experiencing. The fire department does support growth and development in the community, however, population growth without addressing additional resource needs will place a greater stress on an already strained response system. As the population and call volume continue to increase the City will need to consider an additional fire station and staffing in the near future. These increases will be necessary to continue to provide the same excellent service we provide today.

Sincerely,

Sean P. Slamon

Fire Chief



CARSON CITY, NEVADA

CONSOLIDATED MUNICIPALITY AND STATE CAPITAL

MEMORANDUM

TO: Lee Plemel, Community Development Director

FROM: Nicki Aaker, Health and Human Services Director

Dustin Boothe, Disease Control and Prevention Division Manager

DATE: May 19, 2020

SUBJECT: Growth Management for 2020 Residential Allocations and Commercial

Average Daily Water Usage

1. Does your department or agency have any extraordinary service capacity issue that would be negatively impacted by residential growth in 2020-21? If so, identify the issues.

With growth in our residential population we would likely see a slight increase in workload and in the time needed to complete the building permit review process. Increased residential growth will also increase the number of customer complaints regarding unsanitary conditions in their neighborhoods and commercial establishments in our community.

2. Do you recommend limiting the number of residential building permits (new construction) that will be made available for the 2020 calendar year to address these issues? If so, what limit, and how will this limit on residential growth help resolve your service capacity problem?

No, we do not recommend limiting the number of residential building permits.

3. What is needed by your department or agency to solve any service capacity issue identified above?

Increasing Environmental Health staff by a part time field member would help solve any service capacity issues identified above.

Carson City Health & Human Services

900 E Long Street • Carson City, Nevada 89706

1402 West King Street / P.O. Box 603 Carson City, NV 89702



Phone: (775) 283-2000 Fax: (775) 283-2090 www.carsoncityschools.com

Mr. Lee Plemel, Community Development Director Carson City Planning Division 108 E. Proctor Street Carson City, Nevada 89701

May 19, 2020

Dear Mr. Plemel,

Thanks for the opportunity to provide input in accordance with the Growth Management Ordinance. I am grateful to be part of a community that values input from local governments, small business owners and citizens in the planning and operation of the Community.

During the autumn of the current fiscal year, no one could have predicted the health conditions awaiting our nation, state, and community and the loss of economic vitality due to the COVID-19 quarantine. In only two short months, the almost frenzied economic pace observed in October has changed to a quiet calm of general inactivity. I hope that the engines of industry will return soon to a pace to which we are more accustomed. While the present economic downturn points significantly to reduced revenues for the school district in the fall of 2020 the construction of new dwellings, especially apartments, still seems to be moving on at a relatively fast pace.

As you know, the schools in Carson City School District have been closed since the middle of March. Consequently, it is difficult to determine the immediate impact that COVID-19 has had on student enrollment. Even so, the building industry appears to be robust and the number of new dwellings being built appears to be quite large in comparison to the number completed in the past 5 years.

Student enrollment in Carson City has increased steadily over time. In several of our schools, student enrollment now exceeds capacity. Carson Middle School (CMS) now exceeds capacity and has a student enrollment of 1,260. Not only is this school over capacity, but it is also very large. In response, the District has taken steps to modify the Eagle Valley Middle School (EVMS) attendance zone. The plan is to increase the number of students over time who will attend EVMS and by so doing, reduce the number of students attending CMS. In order to accommodate the increase of students at EVMS, the District is in the early stages of planning an addition of classrooms and school-related infrastructure at the site. These actions will create two large middle schools of equal student capacity, programming, and staffing.

Due to the projected growth in Carson City, the District also plans to adjust the attendance zones of the District's elementary schools based on the current planned housing developments. The District plans to keep the elementary school populations to fewer than 650 students at each site.

With all of the wonderful things going for Carson City, growth is inevitable. As long as new, young families move to our community, both the City and the District will be tasked with the challenges associated with growth. Carson City School District is grateful for the relationship that we have with the City leaders. We enjoy a collaborative relationship where both agencies are willing to work together for the greater good of the citizens and the community as a whole. The District appreciates the open communication that we have with the City's Planning Division. We are always provided the opportunity to be included in discussions regarding new developments and provide input regarding the potential impact these proposed developments may have on the schools. Given the current shortage of large vacant properties on which to build new schools, and the limitations to fund the construction of new schools, the District faces significant challenges to deal with student capacity issues. The need to maintain our collaborative working relationship is as important now and in the future as it ever has been.

It is my hope that as new developers propose projects in the City, our community leaders continue as they have in the past to alert and invite school officials to engage in the discussions. Given our challenges to raise capital funds in the necessary amounts to fully purchase and or build new schools, I advocate for any school-friendly allowance or consideration that may be possible from the developer of each residential plan in the City. If possible, the District would prefer to limit new dwelling construction in such a way that expected student enrollment growth could occur gradually and without negatively impacting any one school due to large numbers of school-age students coming into a school attendance zone all at once.

Thanks again for the opportunity to provide this input. I personally feel blessed to live and work in Carson City. Having the ability to be included in the dialog and data gathering process with City officials is an amazing part of the tradition of living and working in Carson City. Thanks for your service to our citizens and the community.

Sincerely,

Richard Stokes, Superintendent

Carson City School District

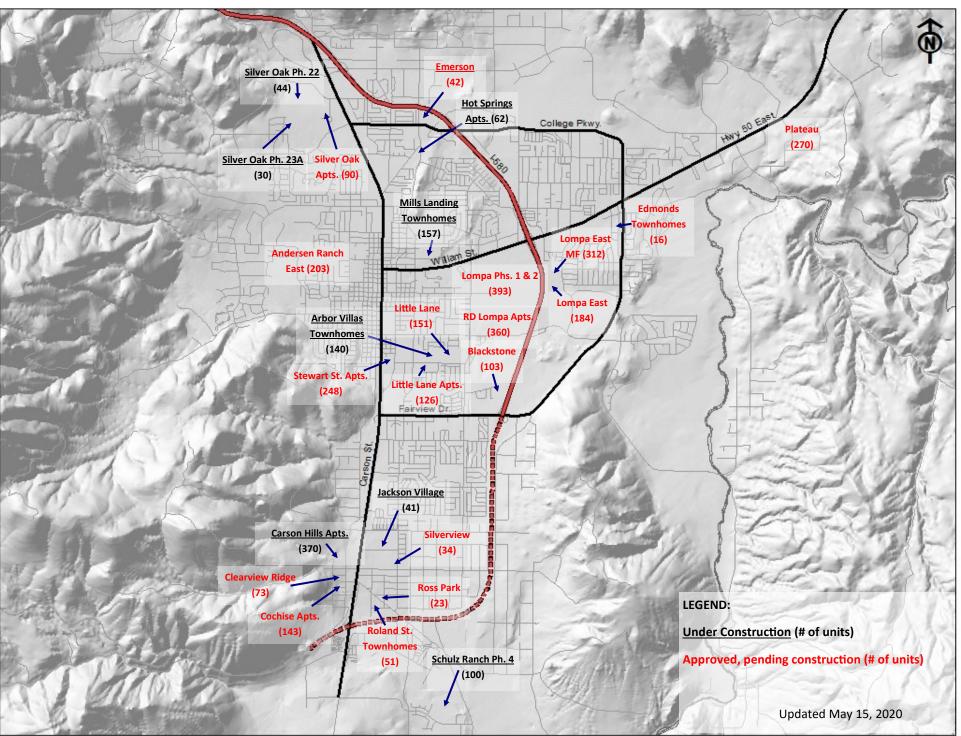
C: Board of Trustees

Andrew J. Feuling, CFO

Richard J. Stokes

Mark Korinek, Director of Operations

Approved Developments (Total Residential Units)



2021 Building Permit Distribution Table (3% alternative) Per CCMC 18.12.055(1)

	Period 1	Period 2	Period 3
	January, February & March	April, May & June	July – December
Total Available	672 allocations available	Any remaining permits available	Any remaining available
Development Category (31 or more lots or units)	Permits divided equally among the qualified development projects on the list as of January 2. Where a development project has less units or lots than the total number of building permits allocated to it, the remaining units shall be divided equally among the remaining development projects. Additional development projects may be added to the list during Period 1 and use any remaining building permits if the units or recorded lots of the qualifying projects on the list total less than the number of building permits allocated to the development category.	A maximum cumulative total of 574 permits (50% above the maximum number originally allocated to the category) may be obtained on a first come, first served basis, or until the total number of available permits run out, whichever comes first.	Any remaining building permits available on a first come, first served basis
General Category	289 building permits available (43%) A maximum of 30 permits may be issued to an individual property owner during this period.	A maximum cumulative total of 578 permits (100% above the maximum number originally allocated to the category) may be obtained on a first come, first served basis, or until the total number of available permits run out, whichever comes first.	Any remaining building permits available on a first come, first served basis

Assumptions:

- The 2019 certified Carson City population estimate is 56,151. (The most current State Demographer population estimate.)
- This certified 2019 population estimate is used as the "baseline" for establishing 2021 residential allocations
- 2.54 persons per household is assumed per 2010 US Census.
- 2019 Allocations Issued = 279

2019 Population:

1) (2019 pop.) + (2019 allocations issued x 2.54) = 2020 pop. est. 56,151

2) (2020 pop. est.) x (% growth rate) = 2021 population estimate 2019 Res. Permits Issued:

3) (2021 pop.) – (2020 pop. est.) = 2021 pop. growth estimate 279

4) $(2021 \text{ pop. growth}) \div (2.54 \text{ pop./unit}) = Number of 2021 allocations$

At 3.0% growth rate:

1)	56,151 +	709	=	56,860	Estimated Sub	sequent Years
2)	56,860 x	1.03 (3.0%)	=	58,565	2022	692 at 3%
3)	58,565 -	56,860	=	1,706 persons	2023	712 at 3%
4)	1,706/	2.54	=	672 allocations	2024	734 at 3%

At 2.5% growth rate:

1)	56,151 +	709 =	56,860	Estimated Subs	sequent Years
2)	56,860 x	1.025 (2.5%) =	58,281	2022	574 at 2.5%
3)	58,281 -	56,860 =	1,421 persons	2023	588 at 2.5%
4)	1,421/	2.54 =	560 allocations	2024	603 at 2.5%

At 2.0% growth rate:

1)	56,151 +	709	=	56,860	Estimated Sub	sequent Years
2)	56,860 x	1.02 (2.0%)	=	57,997	2022	457 at 2%
3)	57,997 -	56,860	=	1,137 persons	2023	466 at 2%
4)	1,137/	2.54	=	448 allocations	2024	475 at 2%