Restoration DRI – Residential Needs Analysis

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EXECUTIVE SUMMARY

- As a point of departure for demonstrating need in this analysis, Fishkind has utilized the population projections included in the *approved and adopted* 2003 Edgewater Comprehensive Plan.

- The population forecast included in the 2003 Edgewater Comprehensive Plan provides projections through only 2020. This is not a sufficient time horizon to properly and appropriately evaluate the City's long-term land use needs.

- Fishkind believes that a minimum of a 25-year time horizon is required for any comp plan to appropriately evaluate the City's long-term land use needs. To this end, Fishkind has extended the forecast contained within the 2003 Comp Plan to include years 2025 and 2030.

- Based on the persons per household and occupancy rate projections included in the existing adopted Comprehensive Plan, a population of 43,078 in 2030 translates into demand for 17,815 housing units.

City of Edgewater Housing Unit Projections.

	2000	2005	2010	2015	2020	2025	2030
Population	18,865	22,865	26,398	30,262	34,481	39,408	43,078
PPH	2.44	2.60	2.60	2.60	2.60	2.60	2.60
Households	7,734	8,794	10,153	11,639	13,262	15,157	16,568
Occupancy Rate	92%	93%	93%	93%	93%	93%	93%
Housing Units	8,437	9,456	10,917	12,515	14,260	16,298	17,815

Source: 2003 Edgewater Comp Plan. Fishkind and Associates, Inc.

- As adopted, the Edgewater FLUM contains capacity for 24,228 housing units. If approved, the Restoration DRI Comp Plan Amendment would have the capacity to accommodate 8,500 housing units.

- If this capacity is added to the currently approved FLUM, then the updated FLUM would have the capacity to accommodate 32,728 units. With demand for 17,815 units and capacity for 32,728 units the resulting allocation ratio for the Edgewater FLUM would be 1.84.

- The recommended allocation ratio for the City of Edgewater is between 2.0 and 2.5. This level of over-allocation ensures proper plan flexibility and an adequate supply of housing units for the City of Edgewater through the planning horizon.

- Approving the Restoration DRI Amendment would increase the allocation ratio to only 1.84; therefore, not only is the approval of the Restoration DRI Amendment warranted, but also additional capacity is required in order to achieve an appropriate allocation ratio over the forecast time horizon.

Allocation Ratio Resulting from the Adoption of the Restoration DRI Amendment

	Housing Units
2030 Housing Unit Demand	17,815
Approved FLUM Housing Capacity	24,228
Allocation Ratio as approved	1.36
Restoration Capacity Added	8,500
FLUM Housing Capacity with Restoration Amendment	32,728
Allocation Ratio with Restoration Amendment	1.84

Source: Fishkind and Associates, Inc.

1.0 Introduction

1.1 Purpose

The Restoration DRI, a proposed mixed-use development that occupies acreage within the City of Edgewater, is requesting an amendment to the Edgewater Comprehensive Plan as part of its Development of Regional Impact – Application for Development Approval (DRI/ADA). This analysis analyzes the future residential land use needs for the City of Edgewater through an examination of regional population growth trends and the currently adopted City of Edgewater Future Land Use (FLUM).

1.2 Overview of Needs Analysis

In the context of amending the adopted Comprehensive Land Use Plan for The City of Edgewater the applicant must demonstrate the need to amend the plan. Typically, this takes the form of a comparison of:

a) The supply of existing land currently planned for various uses and
b) The demand for land based on projected population and other land use demand.

The applicant must demonstrate that there is an insufficient supply of land in the Comprehensive Plan to accommodate the future demand for land required to accommodate the projected future level of population.

In addition the updated comprehensive plan must include a demonstration of financial feasibility and a funding plan for the necessary capital improvements. In this case, the fiscal impact analysis accompanying the Development of Regional Impact – Application for Development Approval (DRI/ADA) provides the demonstration of the financial costs and revenues created by the project proving its financial feasibility including its financially feasible infrastructure financing plan.

2.0 Edgewater Housing Unit Demand Projections

The City of Edgewater has existing population growth forecasts as part of its currently approved Comprehensive Plan. It is Fishkind's opinion that these forecasts are outdated and need to be updated to account for the structural changes that are occurring in the State and impacting Volusia County specifically. As buildout occurs in core urban metros and migration into the State increases, growth will occur increasingly in smaller, less developed population centers. Volusia County and its municipalities are currently experiencing this structural change largely as a result of the buildout of Orange and Seminole Counties. To demonstrate the magnitude of the growth trajectory shift in Volusia County, Fishkind compared the 2003 BEBR population projections for Volusia County to the most recent BEBR population projections (March 2008) for the County. Although the BEBR projections represent countywide growth and not the growth for the City of Edgewater specifically, the same growth pressures impacting the County are also present within County's individual municipalities.

As shown in Table 1, the 2003 BEBR Population Projections for Volusia County showed a total population of 645,200 in 2030. The most recent BEBR projections for the County show a total population of 691,900 for 2030. This represents a projected increase of almost 50,000 people over the same time horizon. Thus, in the five years since the 2003 BEBR projections were formulated, the 2030 projected population for Volusia County has increased 7%. The dramatic increase is a result of the most recent BEBR projections beginning to detect the structural shift that has been occurring in the County since the early part of this decade.

Table 1. 2003 BEBR Medium Projections vs. 2008 BEBR Medium Projections for Volusia County

	2005	2010	2015	2020	2025	2030
2003 BEBR Medium	479,400	515,100	548,900	582,900	615,600	645,200
2008 BEBR Medium	522,500	561,000	596,500	630,700	662,700	691,900
Difference	8.99%	8.91%	8.67%	8.20%	7.65%	7.24%

Source: Bureau of Economic and Business Research (BEBR).

The structural shift occurring in the County and caused by the continued build out of Orange and Seminole Counties has also revealed itself in the historical growth patterns of individual municipalities within the County. Fishkind looked at the average historical growth rates of some of the larger municipalities within Volusia County to demonstrate the recent growth trajectory shift that is occurring throughout the County. Significantly increased levels of population growth were identified in Edgewater, DeLand, New Smyrna Beach, and Port Orange.

As discussed above, it is Fishkind's opinion that the increase in projected population found in the most recent BEBR projections is largely a function of the ability of BEBRs forecasting methodology to capture and reflect the structural change that is currently occurring and has been occurring in the County since the early part of the decade. Table 2 shows the average annual growth rate in Volusia County increasing 8.8% from the period between 1990 and 2000 to the period between 2000 and 2007. In comparison, DeLand has experienced almost a 60% increase over the same time period, while Edgewater, New Smyrna Beach, and Port Orange have undergone an average increase of 15%.

These findings suggest that the structural change is impacting these specific municipalities to a greater degree than the County as a whole. Furthermore, since the 2008 BEBR countywide population projections for 2030 were increased by a factor of 7% over the 2003 BEBR countywide projections based in large part on an 8.8% spike in the current levels of annual growth over the historical averages, then it is reasonable to conclude that municipalities showing a greater than 8.8% spike in current annual growth would require a greater than 7% increase in any population projections that were also made in 2003.

Table 2.
Structural Shift in Growth Trajectory of Volusia County Municipalities.

	1990	1995	2000	2005	2007	Avg. Annual Growth 1990-2000	Avg. Annual Growth 2000-2007	Growth Rate Increase
Volusia County	370,737	402,970	443,343	494,649	508,014	1.8%	2.0%	8.8%
DeLand	16,622	17,973	20,904	25,055	26,905	2.3%	3.7%	58.3%
Edgewater	15,351	17,484	18,668	21,156	21,770	2.0%	2.2%	12.4%
New Smyrna Beach	16,549	18,393	20,048	22,025	23,286	1.9%	2.2%	11.6%
Port Orange	35,399	39,750	45,823	54,630	56,850	2.6%	3.1%	19.6%

Source: Bureau of Economic and Business Research (BEBR).

Based on the analyses provided above, Fishkind is confident in concluding that the population projections found in the 2003 Edgewater Comprehensive Plan are outdated and need to be revised. Despite this conclusion, Fishkind has chosen to utilize the *approved and adopted* 2003 population projections for this analysis. The primary intent of this analysis is to prove with as little ambiguity as possible that the Restoration DRI Comprehensive Plan Amendment is warranted. To this end, Fishkind has relied upon conservative assumptions throughout the entirety of the analysis, including the usage of the 2003 population projections instead of a revised forecast which would more appropriately account for the recent structural change.

Fishkind was required to make only one adjustment to the 2003 population projections. The population forecast included in the Edgewater Comprehensive Plan provides projections only through 2020. This does not represent an appropriate time horizon for properly and appropriately evaluating the City's long-term land use needs, especially considering it is now 2008, 5 years removed from the Comprehensive Plan adoption date. It is not uncommon for new large-scale residential developments to have development schedules that span 15-to-20 years. Thus, with a current time horizon of only 12 years, the Edgewater Comp Plan is ill-equipped to appropriately estimate and accommodate future growth. Fishkind believes that a minimum of a 25-year time horizon is required for the comp plan to appropriately evaluate the City's long-term land use needs. To this end, Fishkind has extended the forecast contained within the 2003 Comp Plan to include years 2025 and 2030. The additional growth was calculated utilizing the average annual projected rate of growth between 2010 and 2020. Table 3 provides the *approved* population projections contained within the 2003 Comp Plan and also provides Fishkind's estimates for the years 2025 and 2030.

Table 3.
Edgewater Comprehensive Plan Population Projections.

	2000	2005	2010	2015	2020	2025[1]	2030[1]
Population	18,865	22,865	26,398	30,262	34,481	39,408	45,039

Source: Population Projection Sub-Element of Edgewater Comp. Plan. 2003. Fishkind and Associates, Inc.
(1) 2025 and 2030 projections were calculated using the average annual rate of growth between 2010 and 2020 (2.71%).

The Housing Element of the Edgewater Comprehensive Plan (effective March 2002) shows a persons per household number of 2.44 for the year 2000 and estimates that the number increases to 2.60 by 2010. The Comp Plan does not project a household size beyond 2010. Fishkind believes that the projected persons per household number for 2010 is unreasonably high given the current demographic trends in the City; however, in a continued effort to maintain as conservative an analysis as possible, a projected persons per household figure of 2.60 has been applied to the population projections found in Table 3 to arrive at a forecast of household growth for the City of Edgewater. Table 4 shows the forecast for household growth within Edgewater based on the persons per household projections contained within the Housing Element of the Edgewater Comp Plan.

Table 4. Edgewater Comprehensive Plan Household Projections.

	2000	2005	2010	2015[3]	2020[3]	2025[3]	2030[3]
Population	18,865	22,865	26,398	30,262	34,481	39,408	43,078
PPH[1]	2.44	2.60	2.60	2.60	2.60	2.60	2.60
Households[2]	7,734	8,794	10,153	11,639	13,262	15,157	16,568

Source: Fishkind and Associates, Inc.

(1) PPH figures were calculated based on "Table III-15-Household Composition, 1990-2010" shown on Page III-31 of the Housing Element of the Edgewater Comp Plan.

(2) Household totals were calculated by applying the PPH figures found in the 2002 Housing Element to the Population Projections found in the 2003 Population Projection Element.

(3) Fishkind has assumed that the persons per household figure for the City of Edgewater will remain constant beyond 2010.

The 2030 household demand in Edgewater must be modified to account for seasonal use and normal occupancy/vacancy rates. Dividing the household demand by the occupancy rate results in the total number of housing units required to accommodate the increase in population. The Edgewater Comprehensive Plan utilized an occupancy rate of 93%, reflective of the seasonal, non permanent nature of a segment of property owners. Fishkind's research shows that occupancy rates have remained relatively unchanged since the Comprehensive Plan was approved. For this reason, Fishkind utilized an occupancy rate of 93% to forecast the demand for housing units. Applying this figure to the household projections reported in Table 4 results in a demand for 17,815 housing units in 2030. These figures are shown in Table 5.

Table 5. Housing Unit Projections.

	2000	2005	2010	2015	2020	2025	2030
Population	18,865	22,865	26,398	30,262	34,481	39,408	43,078
PPH	2.44	2.60	2.60	2.60	2.60	2.60	2.60
Households	7,734	8,794	10,153	11,639	13,262	15,157	16,568
Occupancy Rate	92%	93%	93%	93%	93%	93%	93%
Housing Units	8,437	9,456	10,917	12,515	14,260	16,298	17,815

Source: Fishkind and Associates, Inc. Bureau of Economic and Business Research (BEBR).

3.0 Volume of Residential Acreage in Currently Approved FLUM

The currently adopted Future Land Use Map (FLUM) includes all land use amendments adopted through the end of 2007. The recently annexed acreage is also included, however the land use amendments and future municipal development capacity which has been requested is excluded. Therefore, the FLUM relies on the existing underlying County land use designations for the recently annexed acres. Table 6 shows the breakdown of FLUM residential acres and future land use categories for The City of Edgewater as indicated in the currently adopted Edgewater FLUM. As noted, many of the annexed parcels still possess Volusia County FLUM designations. Municipal lands with Volusia County FLUM designations have been designated with a "C" in the following tables.

Table 6.
City of Edgewater FLUM Acreage

FLU Code	Total Acreage
Agr	65
Comm	463
Conserv	631
Hdr	68
Ind	692
Ldr	2,920
Mdr	728
Muse	831
Public	577
Rec	86
Rtrans	61
C-Com	0
C-ESC	2,012
C-FR	3,339
C-HWY	0
C- LI	54
C - R	288
C - UL	79
C- UM	43
C - W	24
Total	12,961

Source: City of Edgewater Comp Plan.

4.0 Residential Holding Capacity of Edgewater FLUM

The Edgewater FLUM assigns a maximum density to each of the FLUM categories. By applying these maximum densities to the total residential acreage, Fishkind was able to calculate the maximum number of units that can be accommodated by the developable residential acreage found within the Edgewater FLUM. According to the maximum densities assigned to each FLUM category, the Edgewater FLUM, as adopted, contains enough residential acreage to accommodate a maximum of 32,304 housing units. Table 7 shows the maximum densities allowed under each land use category and applies these figures to the respective total residential acreage.

Table 7.
Edgewater FLUM Maximum Residential Holding Capacity

FLU Code	Total Acreage	Max. Density	Max. Capacity
Agr	65	0.40	26
Comm	463	-	-
Conserv	631	-	-
Hdr	68	12.00	811
Ind	692	-	-
Ldr	2,920	5.00	14,602
Mdr	728	8.00	5,822
Muse	831	12.00	9,967
Public	577	-	-
Rec	86	-	-
Rtrans	61	1.00	61
C-Com	0	-	-
C-ESC	2,012	0.04	80
C-FR	3,339	0.05	167
C-HWY	0	-	-
C- LI	54	1.00	54
C - R	288	0.20	58
C - UL	79	4.00	316
C- UM	43	8.00	341
C - W	24	-	-
Total	12,961		32,304

Source: Fishkind and Associates, Inc. City of Edgewater Comprehensive Plan.

As shown in Table 7, the Edgewater FLUM can accommodate a maximum of 32,304 housing units based on the maximum densities assigned to each land use category. Maximum densities however are rarely achieved in practice. As a result of environmental considerations, right of way and drainage requirements, physical and geographical limitations, property ownership patterns, surrounding uses, concurrency constraints and other issues, only a percentage of the maximum densities are ever actually achieved. In other words, although the FLUM indicates that 32,304 units can be accommodated in the City, in reality, only a percentage of those units will ever be built.

Among existing development, Fishkind conducted an analysis on the historical densities that have actually been achieved within each major residential land use type in Edgewater as of 2005. As shown in Table 8 below, the Fishkind analysis estimates average gross densities well below the maximum densities allowed in the comprehensive plan. This indicates that the actual densities achieved in residential approvals are in fact sharply lower than the Comprehensive Plan maximums.

Table 8.
Edgewater Historical Densities by Land Use Category

FLUM Category	Maximum Density	Average Historical Density	% of Maximum
LDR	5.00	3.77	75%
MDR	8.00	6.03	75%
HDR	12.00	9.17	76%

Source: Fishkind and Associates, Inc.

On average, the residential FLUM categories within the City of Edgewater have built out at 75% of the maximum allowable densities. There is no evidence to suggest that future densities obtained within the City will increase over their historical averages; therefore, to determine the actual capacity of each FLUM category at buildout, Fishkind has projected that each FLUM category will build out at 75% of the maximum. Calculating the capacity of the Edgewater FLUM based on 75% of the maximum allowable densities will ensure that the analysis is consistent with the historical growth patterns of the City and does not overstate the potential capacity of the FLUM. It should be noted that the FLUM categories which are not primarily residential serving will ultimately build out at much lower than 75% of the maximum allowed; however, to remain consistent and conservative, Fishkind has utilized the 75% percentage for all FLUM categories. As shown in Table 9, utilizing the densities that are actually expected to occur, as opposed to the maximum allowed, results in a total capacity for 24,228 housing units within the Edgewater FLUM.

Table 9.
Edgewater FLUM Estimated Holding Capacity Based on Actual Densities

FLU Code	Total Acreage	Actual Density	Actual Capacity
Agr	65	0.30	19
Comm	463	-	-
Conserv	631	-	-
Hdr	68	9.00	608
Ind	692	-	-
Ldr	2,920	3.75	10,952
Mdr	728	6.00	4,367
Muse	831	9.00	7,475
Public	577	-	-
Rec	86	-	-
Rtrans	61	0.75	46
C-Com	0	-	-
C-ESC	2,012	0.03	60
C-FR	3,339	0.04	125
C-HWY	0	-	-
C- LI	54	0.75	40
C - R	288	0.15	43
C - UL	79	3.00	237
C- UM	43	6.00	256
C - W	24	-	-
Total	12,961		24,228

Source: Fishkind and Associates, Inc. City of Edgewater Comp Plan.

5.0 Estimating Need for 2006 Amendments based on Recommended Allocation Ratios

In the previous sections, supply and demand for residential housing in Edgewater was calculated for the year 2030 using the currently approved and adopted City of Edgewater population forecasts and the most recent FLUM. The next step is to compare the supply and demand in order to determine the land allocation conditions for the City of Edgewater. Land allocation conditions are measured by the allocation ratio. This ratio is the total allocated housing unit capacity in the FLUM divided by the total housing unit demand. The allocation ratio quantifies the amount of additional acreage required in relation to the directly utilized acreage to assure proper market functioning in the sale, useage and development of land. The additional acreage is required in order to maintain market level pricing and to account for the likelihood that certain lands will not be placed on the market for sale during the forecast horizon, or may be subject to future environmental or other constraints. Thus, the lands allocated in the FLUM should be considerably greater than those that will actually be used or developed.

The projections provided above in Table 5 show a total demand for 17,815 units by 2030. The designated supply of residential land contained in the Edgewater FLUM shows a holding capacity of 24,228 units. Thus, as shown in Table 10, the currently adopted FLUM has an allocation ratio of 1.36. Put another way, the FLUM contains sufficient capacity to accommodate the direct demand for housing units; however, it does not contain an appropriate volume of supply to maintain proper flexibility in the market and to account for the potential of growth in excess of the population projections.

Table 10.
2030 Allocation Ratio based on
Holding Capacity of Adopted FLUM

	2025
Housing Unit Demand	17,815
Holding Capacity (DU)	24,228
Allocation Ratio	1.36

Source: Fishkind and Associates, Inc.

The allocation ratio is an important planning criterion regarding how developable lands should be provided in the comprehensive plan and what the appropriate number of acres should be over time to effectively meet demand. It applies to the entire complement of built and vacant lands, not just the increment of growth. There should be excess allocation of land and acres such that sufficient lands will ultimately be available to meet demand from both current and future households. These excess allocations take into account the fact that certain lands may not be for sale or be developed by existing land owners. Further, over time development restrictions may change due to increased environmental protection which may limit development, effectively removing the development availability of some lands.

Regardless of FLUM designation, the developable capacity of the land may be considerably lower due to existing wetlands or other critical habitat concerns. This is often more common in historically rural locations like Edgewater. Therefore, the supply of designated developable lands should be sufficiently in excess of demand such that the marketplace is not constrained causing an effective restriction of supply. Such an artificial restriction of supply will drive land prices much higher, contributing to ever increasing real estate and housing prices and compromising the provision of affordable and workforce housing. It is important there is some over allocation so residents can have some market choice and flexibility in choosing housing alternatives. Typically a home buyer will look at 2 or more homes before making a choice. A low allocation ratio limits the choices available to consumers and stifles economic growth.

For these reasons, the allocation ratio of developable lands to demand should be in excess of 2.0. Proper planning practices suggest that an allocation ratio of between 2.0 and 3.0 is generally appropriate for most planning districts provided infrastructure, capital planning and concurrency needs are adequately addressed. The appropriate allocation ratio for any one planning district varies and is dependant on a number of factors including, but not limited to: the length of the planning horizon, the historical growth patterns, and the expected levels of growth.

In general, the accuracy of long-term population forecasts degrade as the time horizon is extended. This is especially the case in areas, like Edgewater, where future growth is expected to surpass the historical averages. As such, the FLUM needs to have the flexibility to accommodate growth in excess of what the forecasts project. Thus, not only does the FLUM need to provide market flexibility for the projected population, but, in the case of cities like Edgewater, the FLUM also needs to offer appropriate flexibility to accommodate the potential for growth in excess of the established forecasts. In this context, then, the allocation ratio also serves as a population multiplier.

Fishkind participated in a recent administrative hearing which supports the application of an allocation ratio to ensure flexibility in the comprehensive plan. In this case, a range of allocation ratios above 2.0 were supported and the argument that smaller communities on the cusp of a structural change require higher than normal allocation ratios was also found appropriate by the Hearing Officer.

In the matter Panhandle Citizens Coalition Inc. (PCC) vs. Department of Community Affairs, a petition was filed by PCC to challenge DCA's finding the West Bay Detailed Specific Area Plan (WB DSAP) was in compliance as an amendment to the County Comprehensive Plan. The findings of fact in this case include item #92 which reads:

> "In addition to projecting population growth and assessing capacity to accommodate growth and allocation needs ratio (or multiplier) is necessary to ensure housing affordability and variety in the market; otherwise, the supply and demand relationship is too tight, which may cause a rapid escalation of housing prices. Because the farther in time a local government projects growth, the less accurate those projections tend to be, actual need is multiplied by an allocation needs ratio to produce an additional increment of residential land to accommodate this potential error."

Item #93 states:

> "Small Counties that experience above-normal growth rates may use allocation ratios as high as three of more in order to realistically allocate sufficient buildable land for future growth. The County's allocation ratio of 2.2 before the WB DSAP and FLUM amendments was low from a long term forecasting perspective. When the WB DSAP amendments are factored into the allocation ratio, such growth would raise the allocation ratio to 2.3, which is still relatively low."

Further, in finding #94 it is stated:

> "A land use plan should allow for sufficient inventory to accommodate demand and to provide some choice in order to react to economic factors."

The Hearing Officer determined that the proposed land use amendments were found in compliance with section 163.3184 (1) (b) in part because the demonstration of need with respect to the allocation ratio indicated the allocation ratio of 2.3 was too low to properly accommodate projected future growth over the planning horizon. In keeping with this finding, it can be concluded that the allocation ratio of 1.36 for the City of Edgewater by year 2030 is far too low. By 2030 flexibility in the plan is gone and this will hinder economic growth. At these levels there is no over-allocation whatsoever and the result is there are insufficient lands to accommodate future growth. **Fishkind believes an allocation ratio of between 2.0 and 2.5 for the City of Edgewater is appropriate given the planning time horizon and the expected levels of growth.** This threshold is appropriate for a historically small rural area facing rapid growth over an expanded time frame.

6.0 Conclusions

The *adopted and approved* 2003 housing unit projections for the City of Edgewater show demand for a total of 17,815 housing units in 2030. As adopted, the Edgewater FLUM contains capacity for 24,228 housing units. If approved, the Restoration DRI Comp Plan Amendment would have the capacity to accommodate 8,500 housing units. If this capacity is added to the currently approved FLUM, then the updated FLUM would have the capacity to accommodate 32,728 units. As shown in Table 11 below, with demand for 17,815 units and capacity for 32,728 units, the resulting allocation ratio for the Edgewater FLUM would be 1.84. Thus, even with the adoption of the Restoration DRI Amendment, the Edgewater FLUM will continue to have a relatively low allocation ratio through 2030.

The recommended allocation ratio for the City of Edgewater is between 2.0 and 2.5. This level of over-allocation ensures proper plan flexibility and an adequate supply of housing units for the City of Edgewater through the planning horizon. Approving the Restoration DRI Amendment would increase the allocation ratio to only 1.84; therefore, not only is the approval of the Restoration DRI Amendment warranted, but also additional capacity is required in order to achieve an appropriate allocation ratio over the forecast time horizon.

Table 11.
Allocation Ratio Resulting from the
Adoption of the Restoration DRI Amendment

	Housing Units
2030 Housing Unit Demand	17,815
Approved FLUM Housing Capacity	24,228
Allocation Ratio as approved	1.36
Restoration Capacity Added	8,500
FLUM Housing Capacity with Restoration Amendment	32,728
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Source: Fishkind and Associates, Inc.