



January 23, 2007

Mr. Douglas M. DuPriest  
Hutchinson, Cox, Coons, DuPriest, Orr & Sherlock, P.C.  
777 High Street  
Eugene, Oregon 97401-2782

RE: Proposed Update of Lane County's Coordinated Population Forecast

Dear Mr. DuPriest:

This is to acknowledge receipt of your January 16 letter, written on behalf of your client, Shade Tree, Inc.

While much work needs to be done to fulfill the direction given by the LCOG Board of Directors, I think that I can offer some assurance that may ease the concerns of your client. Your letter substantially references the products of the Region 2050 Project that ended last year. You are quite correct in observing that that project ended without consensus agreement among the partner jurisdictions. Hence, it does not represent an adopted strategy or plan for the growth and development of this region. Further, the task now at hand—the review and possible update of the most recently adopted Coordinated Population Forecast—is a matter separate and apart from the numerous and diverse development and population distribution assumptions that were considered by the Region 2050 Policy Committee and participating jurisdictions.

We have been asked to re-visit the adopted Coordinated Population Forecast and to consider the recent patterns of population distribution as well as long-term trends. Arguably, the experience of recent years has thrown into question the projected rates of growth in some of this county's cities, and perhaps, in the unincorporated areas as well. The applicable statute calls for the coordinating body to "establish and maintain a population forecast..." The use of the word "maintain" suggests that a continual, ongoing process of adjustment of projections was and is envisioned. An adjustment, based upon new data, should not imply that past forecasts were flawed (your term), but rather that new information can be Mr.

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prudently applied to the task, as it becomes known. Assuming that by referencing "normal forecasting methodology" you meant the projection of long- and short-term trends to forecast a defensible future, we are on the same track. Such is our intent.

Finally, on page 5 of your letter, you suggest that members of the public be invited to review the trend data being utilized by our staff and the staffs of the local jurisdictions. Further suggested is the solicitation of "evidence" from the public that might be applied to the forecasting process. My sense is that such public involvement is most relevant at the jurisdictional level. We anticipate that this effort will be an iterative process, and one that will require the policy-level agreement of all twelve cities and Lane County before a final recommendation is made to the LCOG Board of Directors. The decision points lie at the beginning and at the end of the enterprise.

Independently, the thirteen jurisdictions will be asked to consider the trend data for their localities, the previously adopted jurisdictional allocation for the year 2030 and the State's projected county-wide population range for 2030. They will be asked if an adjustment is warranted in the jurisdictional allocation for 2030, and if so, to provide justification. Our staff will be in communication with the officials of each of the cities and with the County, as the process moves forward. When the judgments of all jurisdictions are in hand, the process will shift to the regional level, where the expectations of the cities and the County will be assessed as a whole. At this stage, I would expect there to be some discussion "around the table" about any inconsistencies that may have arisen. While not yet determined, that "table" would quite likely host the city managers and the County Administrator. That group has previously considered the proposed re-visitation of the Forecast and probably represents the most knowledgeable body to work through any differences. As I envision it, the product of their work would then go back to the individual jurisdictions for consideration—presumably by the policy bodies in public session. It would be there that public input would be sought. When agreement is found among the jurisdictions, the proposed new forecast would be referred to the LCOG Board of Directors, which would in public session seek comment and act on the joint recommendation.

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I appreciate that there probably remain unanswered questions, and I would certainly invite you to contact me (682-4395), if I or our staff can provide clarification.

Sincerely,

A handwritten signature in cursive script, appearing to read "George Kloeppe".

George Kloeppe  
Executive Director

## SWANK Bob J

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**From:** SWANK Bob J  
**Sent:** Friday, September 21, 2007 2:36 PM  
**To:** 'Mona & Craig'; STEWART Faye H; DWYER Bill J; FLEENOR Bill A; SORENSON Peter; GREEN Bobby  
**Subject:** RE: LCOG Coordinated Population Forecasts

Mona,

My apology for not responding sooner, but I have been recovering from surgery. First, your comments has been included in the record for the coordinated population forecasts. Second, you asked several questions that I will respond to.

Who is leading the charge?

In 1974 Lane County delegated the responsibility for coordinating various planning activities to Lane Council of Governments. One of those activities that is required under Oregon law is the requirement to establish and maintain a population forecast for the entire area within its boundary for use in maintaining and updating comprehensive plans, and to coordinate the forecast with the local governments within its boundary. The most recent coordinated population forecasts within Lane County were adopted by the LCOG Board in February, 2005. Since then, four Lane County cities, Oakridge, Lowell, Veneta, and Junction City, have requested that LCOG update the forecasts that were adopted in February, 2005. It is expected that the coordinated forecasts will be updated at least every five years, and more often when requested by a city in Lane County or the County. There is no relationship between these forecasts and the Region 2050 project.

Has the public had open and meaningful access to those formulating population growth policies?

This process started about eight months ago. State Administrative Rules specify that the forecasts must take into account documented long term demographic trends as well as recent events that have a reasonable likelihood of changing historical trends. LCOG developed some basic forecasts for each city and the County based only on historical trend information. The process was designed to allow each city to add recent event information that would change the historical trend information if that city felt the event information was important. It was also expected that each city would provide public review and comment on any changes to the existing forecasts for their jurisdiction. In addition, LCOG plans to provide public hearings on the forecasts. And, at the request of the Board of Commissioners, the period for public comment and review will be extended for several months. Lowell is the only city that has requested that the historical trend forecast be changed with recent event information. Lowell conducted public hearings with their Planning Commission and at City Council meetings. All of the cites will be asked to conduct additional hearings on the forecasts at the request of the Board of Commissioners.

Who will be held accountable?

The forecasts are primarily used by the cities for planning purposes related to future infrastructure requirements such as water and sewer. It takes a long to plan and gain approval for these major projects, so long term forecasts are needed. The forecasts need to be updated periodically so that the forecasts are based on the most recent information. The forecasts become more important when they are included in an adopted plan. The city is the jurisdiction that adopts its plans so each city is accountable for its plans.

I hope that this information is helpful.

Bob Swank

-----Original Message-----

**From:** Mona & Craig [mailto:monancraig@pacinfo.com]  
**Sent:** Tuesday, September 11, 2007 10:41 AM  
**To:** STEWART Faye H; DWYER Bill J; FLEENOR Bill A; SORENSON Peter; GREEN Bobby  
**Cc:** SWANK Bob J  
**Subject:** LCOG

I have been following the "progress" of LCOG in working with small cities in Lane County on coordinated population projections. I participated in multiple Region 2050 community gatherings and LCOG meetings on Region 2050. I witnessed the deterioration of that process, and its reincarnation in what we have today - a process the results of which would profoundly impact how our communities grow. Who is leading the charge? Has the public had open and meaningful access to those (not elected) formulating population growth policies? Who will be held accountable?

The LCOG meeting on September 22 in Oakridge (10:00 AM) will play a significant part in what our future will look like. I request the Board of Commissioners evaluate this entire process so that we the people have an opportunity to have a meaningful role in determining the shape our communities will take. I have attended many Veneta City Council meetings and there has been no open, meaningful dialogue with the members of our community on the significance of these population projections.

Mr. Swank, please enter this into the record.

Regards,  
Mona Linstromberg  
87140 Territorial Rd.  
Veneta, OR 97487



October 2, 2007

**To:** Lane County Board of Commissioners  
**From:** George Kloeppel, Executive Director  
**Subject:** County-wide Coordinated Population Forecasts

The Commissioners' approval of Resolution 2007-04 on September 12 requested that the LCOG Board delay the public hearing and adoption of the revised Coordinated Population Forecasts for the cities in Lane County. The Resolution also requested a discussion with the Board of Commissioners about the timing of, and process for, revising such population projections and forecasts.

The Resolution was discussed the following day with the LCOG Executive Committee. I also consulted with Commissioner Stewart and Bill VanVactor on Thursday, the 13th. With the Board's Resolution in hand, the Executive Committee directed that the scheduled public hearing be opened at the LCOG Board meeting on Saturday, September 22, but that the hearing not be closed and that the public record be kept open. The Committee also agreed that, in consideration of the County's wishes, no action would be taken in September by the LCOG Board on the Population Forecast. The consensus was that this action was consistent with the Board of Commissioners' direction, which encouraged more opportunity for public comment and involvement in the population forecasts.

Pursuant to that direction, the LCOG Board opened the hearing and heard comments from two individuals. Both of the speakers commented on the importance of the Forecasts for the cities' planning processes. Commissioner Stewart was present, and the County's resolution was discussed by the LCOG Board of Directors at the Saturday meeting. During that discussion, the cities were encouraged to consider seeking additional public comment regarding their expected future populations. City representatives to the LCOG Board described the importance of the Forecasts to those cities that are in the process of developing plans for future infrastructure needs such as sewer and water services.

So, what is the timing and process from this point forward? LCOG staff will send a notice to each of the cities encouraging them to conduct a public hearing about the Population Forecast for their city as well as the Coordinated Forecasts for the entire County. Notice of the next LCOG public hearing will also be published in the Register Guard and sent to DLCD. The LCOG Board will next meet on Thursday, December 13, at the County's Serbu Center. At this meeting, there will be another public hearing. Following the public hearing, the LCOG Board will decide if action should be taken on the Forecasts or if the adoption should be delayed to continue to further consider the issues. The LCOG Board will consider adoption when it feels that all public comment has been heard and that all significant issues have been resolved.

This letter is intended to begin the discussion with the Board of Commissioners as to the timing of, and process for, revising such population projections and forecasts. Please suggest changes and additions to the process and timing.

cc: Bill VanVactor

November 29, 2007

**To:** Lane County Board of Commissioners

**From:** George Kloeppe, Executive Director

**Subject:** Cost Estimate for Coordinated Population Forecasts

At the November 28 meeting of the Board of Commissioners, the request was made for a cost estimate to perform coordinated population forecasts for Lane County. The request was clarified to be an ongoing cost rather than just a one time cost. Lane Council of Governments has done two coordinated population forecasts in the last five years, so the following estimates are based on those experiences.

The ongoing cost concept is important because it is expected that the coordinated population forecasts will be redone at least every five years, following every decennial census and half way in between. It may be necessary to do a revision even more often due to unexpected change, such as the recent decision to separate the urban growth boundaries for Eugene and Springfield. Ongoing work also includes many related tasks that use population forecasts, Census data and GIS data. Examples include population estimates and forecasts for various planning projects, from infrastructure sizing to transportation. Another example is assisting a city in challenging its annual State population estimate. The ongoing work requires at least a half time staff position that costs about \$60,000 a year including all benefits and overhead.

The first coordinated population forecast that LCOG did was adopted in February, 2005. The process started more than a year and half before that. Direct staff cost for the project was about \$25,000. It was more complex than the more recent project because it included building the forecasting process, using GIS to estimate the population outside city limits but inside urban growth boundaries and extra meetings to allocate the unincorporated population for the first time.

The current process was started about a year ago. Direct staff cost to date is about \$20,000. The process has been simpler because the same forecasting model was used, and there have been no major changes or disagreements.

Other relevant factors that affect the cost are the staffing requirements and the compatibility with other work tasks. The staff members that do the forecasting work need to have experience with a variety of analytical tools that are used for forecasting. They need to understand the different results that can be computed using a compound average growth rate compared to a regression trend analysis compared to a ratio trend analysis, and how to use the GIS system to do estimates and allocations. The staff also needs to know the data sources such as Census data, data from the Center for Population Research, the Office of Economic Analysis, employment data, births and deaths, migration, and geographic information.

Compatibility with other work tasks is a significant opportunity for cost savings. The frequent use of the base information for multiple projects saves expense by reducing data location and familiarization time. Often one project can produce results that can be used by other projects. The current process is a good example. The forecasts that were requested by the cities can also meet the requirements of a transportation planning project.

I hope this information is responsive to your request.

# LCOG

LANE COUNCIL OF GOVERNMENTS

December 5, 2007

Gloria Gardiner  
Department of Land Conservation and Development  
635 Capitol Street NE, Suite 150  
Salem, Oregon 97301-0050

RE: Adoption of coordinated population forecasts  
(DLCD file Lane County 011-07)

Dear Ms. Gardiner:

Thank you for your review and suggestions about the proposed revised coordinated population forecasts for Lane County. This response provides additional information about the process that was used to develop the forecasts and the process that has been followed in preparation for adoption of the forecasts.

In the Adoption section of your letter you note the initial and final hearings are the same day. That is the information that was on the notice to DLCD, but more background information may be useful. The most recently adopted coordinated population forecasts were adopted by the LCOG Board in February, 2005. The revised process started in December, 2006, at the request of four Lane County cities. The proposed forecasts were provided to all the cities in April, 2007, with the request that each local jurisdiction follow the process for public comment that was appropriate for their jurisdiction. This was done because some cities planned to actively pursue revised forecasts while other cities were not as interested. The LCOG Board conducted a public hearing on the forecasts on September 22 and requested that public comment be accepted until its December meeting. The reason that DLCD was not noticed for the September meeting was because legal opinion was that the revision of the coordinated population forecasts was not a land use decision. In September the Lane County Board of Commissioners requested more opportunity for public input in the process, which was done. Four cities conducted public hearings to address the Commissioners request. Due to conflicting legal opinions it was also decided that the notices should conform with the requirements for a land use decision to reduce the potential arguments about the adoption process for the forecasts. The revised coordinated population forecasts are scheduled for another public hearing followed by adoption by resolution by the LCOG Board on December 13, 2007.

The second sentence in the same section of your letter cites the requirement of adoption by the county and inclusion of, or reference to, the amendment in the comprehensive plan. ORS 195.036 states that the coordinating body under ORS 195.025, which authorizes voluntary association of governments to perform the review, advisory and coordination functions assigned to counties, shall establish and maintain a population forecast for the entire area within its boundary for use in

Letter to Gloria Gardiner  
December 7, 2007  
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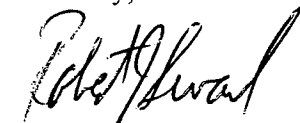
maintaining and updating comprehensive plans, and shall coordinate the forecast with the local governments within its boundary. This language implies that the coordinated population forecasts, when adopted by the coordinating body (LCOG), are available to the cities and county for use in maintaining and updating comprehensive plans. Adoption by a specific city occurs and is required when the city uses the coordinated forecast in a new plan or a plan update. Co-adoption by the county is required for these city plans.

In the **Forecast Period** section you question the length of the forecast. The forecast was focused on 2030, a 22-year forecast, primarily because the Office of Economic Analysis (OEA) provides county forecasts in 5-year increments. It is very straightforward to interpolate the forecasts to obtain a forecast for a specific year. The 2035 forecast was added due the need for a 25-year forecast for transportation planning.

The **Forecasts** section questions the process that was used to develop the forecasts. The forecasts were initially computed using two methods: compound annual growth rate and regression trend analysis. Both are "accepted methods." The regression trends analysis series was chosen because it provided results that were the most consistent with the OEA forecasts, which were used as the target for the total county forecast. Two regression trends were computed, one using a 15-year trend and the other a 5-year trend. Both analyses were based on the certified population estimates from the Population Research Center. This is the same method that was used to compute the coordinated population forecasts that were adopted in February, 2005. So, a single accepted method was used to compute the forecasts. Perhaps the confusion comes from the process that allowed each city to select the forecast that best fit its plans and expectations for the future. Each city had three options: the existing adopted forecast, an updated forecast based on a 15-year trend analysis and an updated forecast based on a 5-year trend. It was important to make these options available because some of the cities, such as Veneta and Lowell, had moratoriums on building due to infrastructure constraints during the prior 15 years, but not during the last 5 years. The optional choices for individual cities are consistent with the requirement the forecasts take into account long term demographic trends as well as recent events that have a reasonable likelihood of changing historical trends. More information about the process and assumptions is available in the public record file on the LCOG website.

This letter is intended to provide additional information about the data and the process that was used to compute the forecasts, and to document that "commonly accepted practices" and "objective sources and verifiable factual information" were used.

Sincerely,



Bob Swank  
LCOG Associate Director



# Oregon

Theodore R. Kulongoski, Governor

## Department of Land Conservation and Development

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November 20, 2007



Bob Swank  
Lane Council of Governments  
99 East Broadway Suite 400  
Eugene, Oregon 97401-3111

**RE:** Adoption of coordinated population projections  
(DLCD file Lane County 011-07)

Dear Mr. Swank:

Thank you for the opportunity to comment on the proposed update of Lane County's coordinated population projections. We applaud the county for keeping this important set of data current. Please include these comments in the record for the case.

### **Adoption**

Oregon Administrative Rule (OAR) 660-024-0030, "Population Forecasts," states:

(1) Counties must adopt and maintain a coordinated 20-year population forecast for the county and for each urban area within the county consistent with statutory requirements for such forecasts under ORS 195.025 and 195.036. . . In adopting the coordinated forecast, local governments must follow applicable procedures and requirements in ORS 197.610 to 197.650 and must provide notice to all other local governments in the county. The adopted forecast must be included in the comprehensive plan or in a document referenced by the plan.

We note that the notice provided to DLCD is from the Lane Council of Governments (LCOG), and lists the initial and final hearings on the same day. We are aware that Lane County has delegated its population projection coordination responsibility to LCOG; the cited administrative rule, however, requires adoption by the county and inclusion of, or reference to, the amendment in the comprehensive plan.

### **Forecast Period**

The rule section cited above refers to a "coordinated 20-year population forecast," as does Statewide Planning Goal 14. We note the proposal is for a forecast to 2035 – over 27 years. If the forecast is to be used by any Lane County cities for UGB evaluations, the forecast should include interim times, such as 2028.

**Forecasts**

OAR 660-024-0030 also states:

(2) The forecast must be developed using commonly accepted practices and standards for population forecasting used by professional practitioners in the field of demography or economics, and must be based on current, reliable and objective sources and verifiable factual information, such as the most recent long-range forecast for the county published by the Oregon Office of Economic Analysis (OEA). The forecast must take into account documented long-term demographic trends as well as recent events that have a reasonable likelihood of changing historical trends. The population forecast is an estimate which, although based on the best available information and methodology, should not be held to an unreasonably high level of precision.

The county forecast, to which this rule applies, must be developed using “commonly accepted practices and standards.” We believe the county has the option of forecasting the county population and allocating it to the cities, or forecasting each city separately and deriving a county total by summing the urban and rural forecasts. It appears the county forecast is a sum of the forecasts for each urban area plus the rural population. If this is the method used, then each individual urban area population and the total for the rural area must be forecasted using “accepted methods.”

We note the proposed city forecasts are based on population estimates from Portland State University, which is generally considered a “current, reliable and objective source and verifiable factual information.” However, the forecasts for individual cities do not appear to be calculated using a consistent method. For example, the 2035 forecast for several of the cities (Cottage Grove, Creswell, Oakridge, and Westfir) utilizes the 15-year trend projected forward. The forecast for Veneta, however, is based on projection of a five-year trend. Others don’t appear to match either the five- or 15-year trend, and these forecasts are not explained in the materials we received. The rural population appears to be a constant, as it is the same for both the five- and 15-year trends.

If the overall county forecast is indeed a sum of the various individual forecasts, we suggest that a single, accepted method be applied consistently (recognizing the assumptions for the rural area may be different than for the cities).

**Summary**

The administrative rule on population forecasts, which has only been effective since April 2007, codified obligations regarding coordinated population projections. These comments are offered as assistance in successfully applying the provisions of the rule and the goal and statutes it implements. We do not object to any of the individual city forecasts. We do not necessarily find that the overall county forecast fails to satisfy rule requirements, but there is inadequate information to determine whether it is based on

“commonly accepted practices” and “objective sources and verifiable factual information.”

Thanks again for the opportunity to comment. If you have any questions, please don't hesitate to contact me at (503) 373-0050, extension 282 or [gloria.gardiner@state.or.us](mailto:gloria.gardiner@state.or.us).

Sincerely,

A handwritten signature in cursive script that reads "Gloria Gardiner". The signature is written in black ink and has a long, sweeping underline that extends to the right.

Gloria Gardiner  
Urban Planning Specialist

cc: Kent Howe, Lane County Planning Director  
Darren Nichols, Community Services Division Manager (by e-mail)  
File