

FLORIDA DEPARTMENT OF EDUCATION



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Received via email
7/16/2009

July 13, 2009

Mr. D. Ray Eubanks, Plan Processing Administrator
Division of Community Planning
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

Dear Mr. Eubanks:

Re: Coral Gables 09-1ER

Thank you for the opportunity to review the proposed EAR-based amendment package transmitted by the City of Coral Gables. The amendment package includes non-substantive revisions to the public school facilities element, on which the Department has no comment. The amendment package also includes revisions to the capital improvements element, including a new policy (CIE 9-5.1.3) related to the Miami-Dade County School Facilities Work Plan. The Department has two comments on the revised Capital Improvements Element, as follows:

1. First, the city adopted its amendment package to implement public school concurrency in March 2008 and the Department of Community Affairs issued its Notice of Intent to find the amendment package In Compliance on May 12, 2008. The city's EAR-based amendment package does not include the school-related CIE amendments the city adopted in March 2008 (see attached pages from the school amendment). Prior to adopting the EAR-based amendments, the city should revise the CIE to ensure it reflects the school-related CIE policies.
2. Second, the city appears to be including the required annual CIE update as part of the EAR-based amendment package. As part of adopting the school concurrency plan amendment package, the city included CIE Objective 9-2.2, which incorporated the Miami-Dade County

SPESSARD BOATRIGT
DIRECTOR, OFFICE OF EDUCATIONAL FACILITIES AND SMART SCHOOLS CLEARINGHOUSE

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Mr. D. Ray Eubanks
July 13, 2009
Page 2 of 2

School Board's 2007 District Facilities Work Plan by reference and required an annual review and update thereafter. While the city includes new CIE policy 9-5.1.3 which appears to intend to adopt the 2008-09 through 2012-13 district facilities work plan by reference, the policy would be improved if revised for clarity on that point. Further, the work plan is not provided as a support document and the amendment is not supported with data and analysis to demonstrate the adopted level of service standard for schools will be achieved. Because the School Board will adopt its 2009-10 through 2013-14 district facilities work plan before October 1, the Department strongly recommends the city to work with school district staff to determine whether the city should revise the policy to reflect adoption of the 2009 plan. If the city intends to adopt the EAR-based amendments prior to October 1, this recommendation does not apply.

Again, thank you for the opportunity to review and comment on the proposed amendment package. Please feel free to contact me if you have any questions.

Sincerely,



Tracy D. Suber
Educational Consultant-Growth Management Liaison

TDS/

cc: Mr. Ivan Rodriguez, Miami-Dade County Public Schools
Mr. Bob Dennis, DCA

Amendment to Capital Improvements Element (12.11.07)

POLICY 9-1.2.1 (H). PUBLIC SCHOOL FACILITIES LEVEL OF SERVICE (LOS): Coordinate new residential development with the future availability of public school facilities consistent with the adopted level of service (LOS) standards for public school concurrency to ensure the inclusion of those projects necessary to address existing deficiencies in the 5-year schedule of capital improvements, and meet future needs based upon achieving and maintaining the adopted level of service standards throughout the planning period. Beginning January 1, 2008, the adopted LOS standard for all Miami-Dade County Public Schools facilities is 100% utilization of Florida Inventory of School Houses (FISH) Capacity (with relocatable classrooms). This LOS standard, except for magnet schools, shall be applicable in each public school concurrency service area (CSA), defined as the public school attendance boundary established by Miami-Dade County Public Schools.

The adopted LOS standard for Magnet Schools is 100% of FISH (With Relocatable Classrooms), which shall be calculated on a districtwide basis.

LOS standards for public school facilities apply to those traditional educational facilities, owned and operated by Miami-Dade County Public Schools, that are required to serve the residential development within their established Concurrency Service Area. LOS standards do not apply to charter schools; however, the capacity of both charter and magnet schools is credited against the impact of development. No credit against the impact of development shall be given for either magnet or charter schools if their enrollment is at, or above, 100% FISH capacity.

Certification of the availability and commitment of capacity by Miami-Dade County Public Schools during the concurrency review process shall be sufficient to demonstrate that such facilities are available to meet the impacts of a residential development.

POLICY 9-1.3.3 (8). Public school facility capacity improvements programmed in the first three years of the Miami-Dade County Public Schools Facilities Work Program shall be counted as available capacity for purposes of concurrency. The necessary public school facilities must be in place or under actual construction within three years after issuance of final site plan approval.

POLICY 9-1.3.6. PUBLIC SCHOOL FACILITY MITIGATION: The City in coordination with Miami-Dade County Public Schools shall include proportionate share mitigation methodologies and options for public school facilities in its concurrency management program and the Updated and Restated City of Coral Gables and Miami-Dade County School Board Interlocal Agreement for Public School Facility Planning, consistent with the requirements of Chapter 163, Florida Statutes. The intent of these options is to provide for the mitigation of residential development impacts on public school facilities through Public School Mitigation Agreements that provide for one or more of the following: (1) contribution of land; (2) the construction, expansion, or payment for land acquisition or construction of a permanent public school facility; or (3) the creation of a mitigation bank for the right to sell capacity credits.

OBJECTIVE 9-2.2: PUBLIC SCHOOL FACILITIES WORK PROGRAM. Pursuant to Chapter 163, Florida Statutes, the Miami-Dade County Public Schools Facilities Work Program, adopted September 2007, is incorporated by reference into the City's Capital Improvement Plan, as applicable.

The City of Coral Gables shall coordinate with Miami-Dade County Public Schools to annually update its Facilities Work Program to include existing and anticipated facilities for both the 5-year and long-term planning periods, and to ensure that the adopted level of service standard, including interim standards, will continue to be achieved and maintained. The City of Coral Gables, through its updates of the Capital Improvements Element and Program, will incorporate by reference the latest adopted Miami-Dade County Public Schools Facilities Work Program for educational facilities. The City of Coral Gables and Miami-Dade

County Public Schools will coordinate their planning efforts prior to and during the City's Comprehensive Land Use Plan amendment process, and during updates to the Miami-Dade County Public Schools Facilities Work Program.

The Miami-Dade County Public Schools Facilities Work Program will be evaluated on an annual basis to ensure that the level of service standards will continue to be achieved and maintained throughout the planning period.

I:\C L U P\School Concurrency Amendments\12 11 07 Capital Improvements Element.doc



SOUTH FLORIDA WATER MANAGEMENT DISTRICT

July 29, 2009

Ray Eubanks, Administrator
Plan Review and DRI Processing
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, FL 32399-2100

Dear Mr. Eubanks:

**Subject: City of Coral Gables, DCA # 09-1ER
SFWMD Comments on Proposed Comprehensive Plan Amendment
Package**

The South Florida Water Management District (District) has completed its review of the proposed amendment package submitted by the City of Coral Gables (City). The package includes the Water Supply Facilities Work Plan (Work Plan) in conjunction with its Evaluation and Appraisal Report based amendments. The City is a built-out community in Miami-Dade County (County). The City's potable water supplier is the County. The Work Plan indicates that the City's future water demand is consistent with the County's adopted Work Plan.

The Work Plan is thorough, complete, and demonstrates coordination with the County to ensure that the existing and future water needs of the City will be met. Therefore, we offer no recommendations for inclusion in your review comments to the City. We encourage the City to continue their water conservation endeavors with the County.

We look forward to collaborating with the Department of Community Affairs, the City, and their water supplier in developing sound, sustainable solutions to meet the City's future water needs. For assistance or additional information, please contact John Mulliken, Director, Water Supply Planning Division at (561) 682-6649 or jmulls@sfwmd.gov.

Sincerely

A handwritten signature in black ink that reads "Terrie Bates". The signature is fluid and cursive, with a long horizontal stroke at the end.

Terrie Bates
Assistant Deputy Executive Director
Water Resources

c: Marjorie G. Craig, P.E., SFWMD
Bob Dennis, DCA
Rachel Kalin, SFRPC
Marc LaFerrier, Miami-Dade County
Jim Quinn, DEP
Eric Riel, Jr., City of Coral Gables
Maria Valdes, Miami-Dade County



11 BD
8/12/09

FLORIDA DEPARTMENT OF STATE
Kurt S. Browning
Secretary of State
DIVISION OF HISTORICAL RESOURCES

August 11, 2009

Mr. Ray Eubanks
Department of Community Affairs
Bureau of State Planning
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

Re: Historic Preservation Review of the Coral Gables (09-1ER) Comprehensive Plan Amendment (Miami-Dade County)

Dear Mr. Eubanks:

According to this agency's responsibilities under Section 163, *Florida Statutes*, and Chapter 9J-5, *Florida Administrative Code*, we reviewed the above document to determine if data regarding historic resources were given sufficient consideration in the request to amend the Coral Gables Comprehensive Plan.

We reviewed the proposed Evaluation and Appraisal Report based text amendments to the Coral Gables Comprehensive Plan to consider the potential effects of these actions on historic resources. The size of the print made it difficult to review, and because of this we have cursory comments.

The Future Land Use Element provides for protection of historic resources, and sensitive reuse of these resources. The new Design Element encourages the preservation of the city's architectural heritage. The Mobility Element (fka Traffic Circulation) preserves historic roadways from expansion; and ensures that they will be maintained at their present designation and capacity. The Natural Resources Element also ensures historic site protection.

The City of Coral Gables has also chosen to include a Historical Resources Element within its comprehensive plan. This element has been updated to reflect the rewritten zoning code. In this element, major topics provide for provisions for increasing locally designated resources, increasing public outreach, identifying the impacts of development on historic resources, and providing economic incentives to property owners.

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Director's Office
(850) 245 6300 • FAX: 245 6436

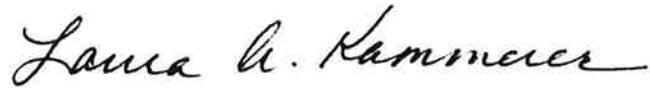
Archaeological Research
(850) 245 6414 • FAX: 245 6452

Historic Preservation
(850) 245 6333 • FAX: 245 6437

Mr. Eubanks
August 11, 2009
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If you have any questions regarding our comments, please feel free to contact Susan M. Harp of the Division's Compliance Review staff at (850) 245-6333.

Sincerely,

A handwritten signature in cursive script that reads "Laura A. Kammerer".

Laura A. Kammerer, Historic Preservationist Supervisor
Compliance Review Section
Bureau of Historic Preservation

xc: Mr. Bob Dennis



Florida Department of Transportation

11 BD
8/13/09

CHARLIE CRIST
GOVERNOR

1000 NW 111 Avenue
Miami, Florida 33172-5800

STEPHANIE C. KOPELOUSOS
SECRETARY

August 11, 2009

Mr. Ray Eubanks
Division of Community Planning
Florida Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

Subject: City of Coral Gables EAR-Based Amendments 09-1ER

Dear Mr. Eubanks:

In accordance with your request, and the provisions of Chapter 163, Florida Statutes and Chapter 9J-5, Florida Administrative Code, this office has completed a review of the City of Gables EAR-Based Amendments 09-1ER which was forwarded to our office on July 14, 2009. There are no impacts anticipated to the State Highway System facilities resulting from these amendments. Therefore, the District has no specific objections or recommendations at this time. Please contact Carlton Card at 305-470-5875, if you have any questions concerning our response.

Sincerely,

Alice N. Bravo, P.E.

District Director of Transportation Development

Cc: Aileen Boucle, AICP



Florida Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

August 24, 2009

Mr. D. Ray Eubanks
Plan Review and DRI Processing Team
Florida Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

Received via email
8/24/2009

RE: Coral Gables 09-1ER

Dear Mr. Eubanks:

On behalf of the Department of Environmental Protection, the Office of Intergovernmental Programs has reviewed the County's comprehensive plan amendments in accordance with the provisions of Chapter 163, *Florida Statutes*. As required by law, the scope of our comments and recommendations is limited to the environmental suitability of the proposed changes in light of the Department's regulatory and proprietary responsibilities. Based on our review of the report, the Department has found no provision that requires comment, recommendation or objection under the laws that form the basis of the Department's jurisdiction and authority. If the report pertains to changes in the future land use map or supporting text, please be advised that at such time as specific lands are proposed for development, the Department will review the proposal to ensure compliance with environmental rules and regulations in effect at the time such action is proposed. In addition, any development of the subject lands will have to comply with local ordinances, other comprehensive plan requirements and restrictions, and applicable rules and regulations of other state and regional agencies.

Thank you for the opportunity to comment on this proposal. If I may be of further assistance, please call me at (850) 245-2169.

Sincerely,

Christopher J. Stahl
Environmental Specialist
Office of Intergovernmental Programs

/cjs