



STATE OF FLORIDA
DEPARTMENT OF COMMUNITY AFFAIRS

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 Secretary

February 14, 2005

Mr. Eric Riel, Jr., Director
 City of Coral Gables Planning Department
 City Hall 405 Biltmore Way
 Coral Gables, Florida 33134

Dear Mr. Riel:

The Department of Community Affairs has reviewed your letter of February 2, 2005, which outlined the scope of work for the City of Coral Gables' Evaluation and Appraisal Report (EAR). The Department concurs that the following major issues, as identified in your letter, will form a good basis for preparing the City's EAR: revision of the Housing Element, to include provision of work-force housing and promotion of senior housing; maintenance of single-family residential neighborhoods and mitigation of adjoining commercial and high-density residential uses; mitigation of traffic impacts, to include promotion of alternative modes of transportation and strengthening of intergovernmental coordination; and placement of parks according to the Parks Master Plan, to include the acquisition of new parks.

In addition to the major issues, please note that the City must also address in its EAR the items listed in § 163.3191(2)(a)-(m), Florida Statutes, as applicable. We would like to call your attention particularly to the following:

- Population projections should include the 5- and 10-year planning timeframes.
- The City should use these population projections to forecast the community infrastructure needs for the 5- and 10-year planning timeframes.
- If it has not already done so, the City should prepare, for inclusion in its comprehensive plan, recommended intensity standards for all of its nonresidential future land use categories and, for its mixed-use future land use categories, a recommended percentage distribution among the mix of uses, or other objective measurement.
- Affordable housing should be discussed in the EAR (as noted in your list of major issues).

We look forward to receiving the City's EAR. If you have any questions or need additional assistance, please get in touch with Paul Darst, reviewing planner, at (850) 922-1764 or email: paul.darst@dca.state.fl.us.

Sincerely,

Charles Gauthier, AICP
 Chief, Office of Comprehensive Planning

cc: Ms. Carolyn Dekle, Executive Director, South Florida Regional Planning Council

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The City of Coral Gables

Planning Department

CITY HALL 405 BIRMGORE WAY

14

February 2, 2005

Mr. Dan Evans
State of Florida
Department of Community Affairs
Division of Community Planning
2555 Shumard Oak Boulevard
Tallahassee, FL 32399

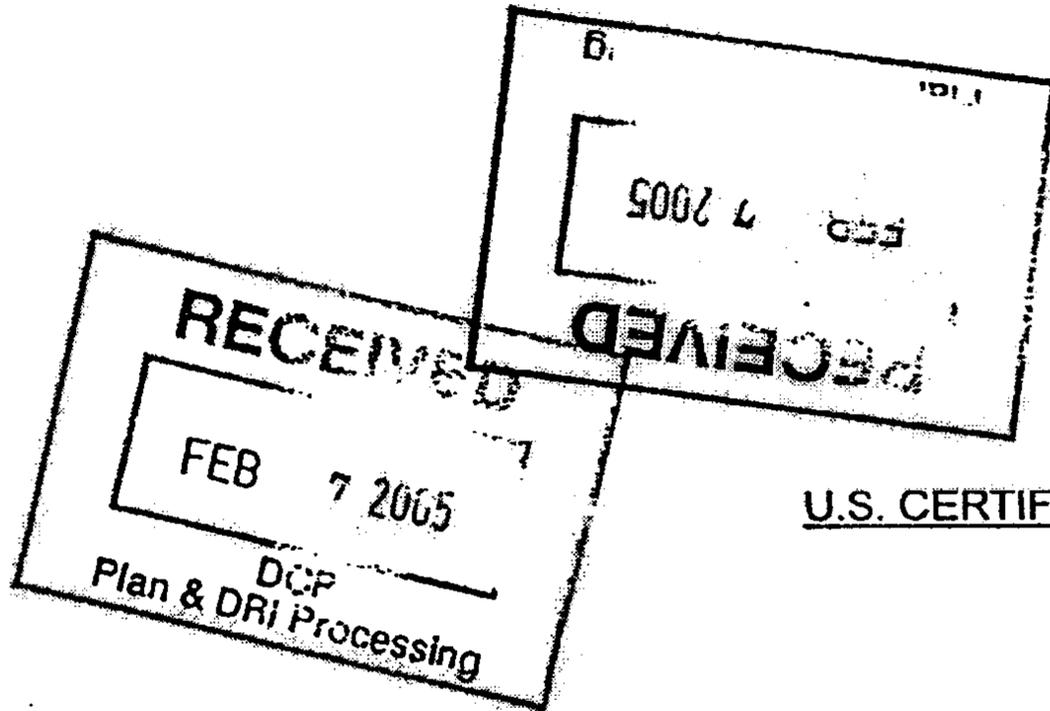
RE City of Coral Gables Evaluation and Appraisal Report (EAR) Scoping Meeting

Dear Mr. Evans:

Thank you again for meeting with the City of Coral Gables and its consultant team on Friday, January 28, 2005 for our initial EAR scoping meeting. As agreed upon at that meeting, the City will proceed with presenting the following issues to the public at the tentatively scheduled April 13, 2005 Scoping Meeting:

- Complete Rewrite of Housing Element
 - Provide Workforce Housing within the City of Coral Gables
 - Promotion of Senior Housing within the City
- Maintain Single Family Residential neighborhoods and mitigate adjoining Commercial and High Intensity Residential Uses
 - Strengthen Existing Policies and Create New Policies
- Mitigation of Traffic Impacts
 - Promote Alternative Modes of Transportation
 - Strengthen Intergovernmental Coordination
- Placement of Parks per the Parks Master Plan
 - Parks and Recreation is Conducting a Study, Follow Recommendation of Parks and Recreation Study
 - Acquire Land for New Parks

The City is looking forward to working with both the Department of Community Affairs (DCA) and South Florida Regional Planning Council throughout the completion of the EAR and subsequent EAR-based amendments to the Comprehensive Land Use Plan.

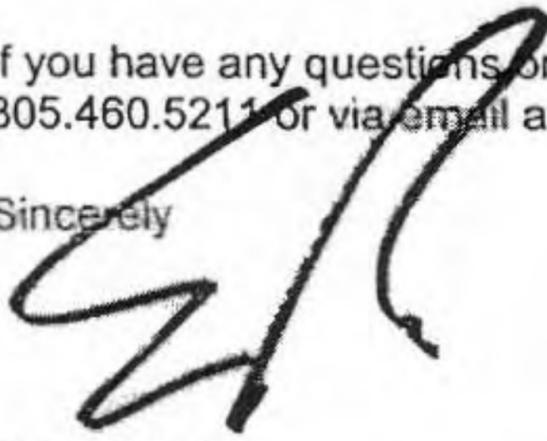


U.S. CERTIFIED MAIL

Mr. Dan Evans
February 2, 2005
Page 2

If you have any questions or need additional information, please do not hesitate to call me at 305.460.5211 or via email at eriel@coralgables.com.

Sincerely



Eric Riel, Jr.
Planning Director

cc: Elizabeth Hernandez, City Attorney, City of Coral Gables
Richard Cannone, Principal Planner, City of Coral Gables
Wendy Larsen, Siemon & Larsen, PA
Ellie Zachariades, Siemon & Larsen, PA
Matt Barnes, Siemon & Larsen, PA
Valerie J. Hubbard, AICP, Director, Division of Community Planning, DCA
Roger Wilburn, Acting Regional Administrator, Division of Community Planning, DCA
Bob Daniels, Principal Planner, South Florida Regional Planning Council
Carlos Gonzalez, Senior Planner, South Florida Regional Planning Council
Planning Department File

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South
Florida
Regional
Planning
Council



August 20, 2006

Mr. Eric Riel, Jr., Planning Director
City of Coral Gables
City Hall
405 Biltmore Way
P.O. Box 141549
Coral Gables, FL 331 14

RE: Sufficiency Determination City of Coral Gables Comprehensive Plan Evaluation and Appraisal Report

Dear Mr. Riel:

The South Florida Regional Planning Council has completed its 90-day final sufficiency review of the Evaluation and Appraisal Report (EAR) for the City of Coral Gables Comprehensive Plan, adopted by Resolution Number 2006-92 on May 12, 2006. The Council has determined the adopted EAR to be insufficient because it does not adequately address the requirements in Sections 163.3191(2)(e) and (h), Florida Statutes (F.S.), as they relate to City's provision of transportation services and the financial feasibility of the Comprehensive Plan. See the Council's attached analysis, with recommendations for remedying the identified insufficiencies. In addition, please see the attached comments from the Florida Department of Community Affairs.

I understand that City staff and Council staff have started to coordinate to address and resolve the concerns raised above and in the attached report. The Council's staff is available should you require assistance in responding to this preliminary determination.

If you have any questions, please do not hesitate to call Carlos Gonzalez, or me, at (954) 985-4416.

Sincerely,

Terry Manning
Senior Planner

Attachments

cc: Ray Eubanks, Department of Community Affairs, Plan Processing Team
Roger Willburn, Department of Community Affairs, Regional Planning Administrator
Javier Betancourt, Principal Planner, City of Coral Gables

ADVISORY REPORT

for the Adopted Evaluation And Appraisal Report of the City Of Coral Gables Comprehensive Plan

August 2006

INTRODUCTION

This report has been prepared to provide City of Coral Gables staff with the results of the review of the Adopted Evaluation and Appraisal Report (EAR) for the City of Coral Gables Comprehensive Plan. Pursuant to Section 163.3191(8), Florida Statutes (F.S.), the Florida Department of Community Affairs (DCA) has delegated review of the EAR to the South Florida Regional Planning Council (SFRPC).

The review of the City of Coral Gables EAR is being conducted in accordance with Section 163.3191, F.S., and is focused on EAR content requirements as contained in Subsections 163.3191(2)(a)-(m), F.S., and the major issues identified by the City and agreed to by DCA in the DCA's Letter of Understanding, dated February 14, 2005.

Comprehensive Plan Status

The City of Coral Gables incorporated in 1925 and adopted its revised Comprehensive Plan in 1997. This is the second EAR analysis to be undertaken by the City since its Comprehensive Plan was adopted.

Letter of Understanding

DCA approved the City's EAR scope of work in a letter of understanding dated February 14, 2005.

Adopted Evaluation and Appraisal Report Review Findings and Recommendations

The EAR was submitted in May 22, 2006 after new legislation was put into effect that changes the evaluation requirements for EARs. The City should note that 163.319(2) F.S., as amended by Senate Bill (SB) 360, which became effective July 1, 2005, now includes two new evaluation requirements: (o) and (p), which concern transportation concurrency exception areas, transportation concurrency management areas, multimodal transportation districts, and transportation concurrency methodologies.

The SFRPC's review of the City of Coral Gables Adopted EAR has determined that the EAR does not thoroughly review the performance of the City's Comprehensive Plan. The SFRPC's review of the Adopted EAR finds that the EAR is not sufficient at this time. It is recommended that the City consider the issues detailed below and amend the EAR to address the issues as noted.

EAR CONTENT REQUIREMENTS

A summary of the Adopted EAR review is included below. Specific needs for additional information or clarification are discussed in the analysis of each major issue.

I. EAR INTRODUCTION SECTION

For this requirement the EAR has been reviewed for a description of the EAR preparation and adoption process (163.3191(2) (j), F.S.).

Sufficient

II. CONDITION OF EACH ELEMENT AT THE DATE OF THE REPORT

For this analysis the EAR has been reviewed for the following:

A. Current Conditions for Major Issues (163.3191(2) (e))

Additional Information Needed: Chapter 163.3191, F.S., requires that the EAR evaluate the financial feasibility of implementing the comprehensive plan and of providing needed infrastructure to achieve and maintain adopted level-of-service standards and sustain concurrency management systems through the Capital Improvements Element, as well as the ability to address infrastructure backlogs and meet demands on public services and facilities. In the traffic circulation analysis, Table 2.2 outlines fifteen (15) roadway segments within the City currently operating at LOS F. These road segments fail to meet the adopted LOS of E. The City does not address mitigation measures for these road segments in its analysis of infrastructure. The City also does not include data and analysis that support a Capital Improvements Program addressing future capital investments and its financial feasibility to ensure maintenance of the adopted LOS. It is recommended that the City amend the Adopted EAR to include data and analysis pertaining to:

1. A financially feasible Capital Improvement Element/Program delineating all infrastructure facilities needed, projected costs and funding sources for the 5 to 10 year planning horizon or City's comprehensive planning period.
2. Specifically address what traffic mitigation measures the City would propose to implement to improve the roadway segments LOS, how these measures would be achieved and maintained during the 5 to 10 year planning horizon or City's planning horizon. See also DCA comments pertaining this issue.
3. Further identify the successes, shortcomings and failures of past goals, objectives and policies of the Capital Improvements Element specifically relating to roadways levels of service. See also DCA comments pertaining this issue.

B. Population Growth, Changes In Land Area, Vacant Land And The Location Of Existing Development As Compared To The Location Anticipated In The Plan (163.3191(2) (a) (b) and (c))

Additional Information Needed : The adopted EAR does not identify population projections for the next 5 to 10 year planning horizon or for the next comprehensive planning period. It is recommended that the City amend the Adopted EAR to include the following:

1. Population projections for the next 5 to 10 year planning horizon or the City's next comprehensive planning period.

2. Provide policy recommendations for planning actions needed to accommodate projected population growth for the 5 to 10 year planning horizon as it relates to future land use and infrastructure needs.

See also the attached comments from the Florida Department of Community Affairs.

C. Assessment of Successes and Shortcomings of Each Element (163.3191(2) (h))

Additional Information Needed: In its analysis of coordination with the Miami-Dade Public Schools, the City indicates that all schools serving Coral Gables are overcrowded. However, the City does not provide data and analysis as to the effectiveness of its goals and policies relating to public schools location and/or co-location as well as its intergovernmental efforts with the Miami-Dade Public Schools and adjacent jurisdictions within the framework of the established Inter-local Agreement. It is recommended that the City amend the Adopted EAR to include data and analysis that identifies the successes, shortcomings and failures of past goals, objectives and policies and their implementation mechanisms to accomplish appropriate coordination of future land uses with the location of public schools.

III. COMPARISON OF PLAN'S ADOPTED OBJECTIVES WITH ACTUAL RESULTS TO DETERMINE WHETHER THE OBJECTIVES HAVE BEEN ACHIEVED (163.3191(2) (g))

The focus of the EAR review is on those objectives that are related to the major issues and minimum EAR content requirements.

Sufficient

IV. MAJOR PROBLEMS OF DEVELOPMENT, PHYSICAL DETERIORATION, LOCATION OF LAND USES AND THE SOCIAL AND ECONOMIC EFFECTS OF THE MAJOR PROBLEMS IDENTIFIED (163.3191(2) (e))

The EAR has been reviewed to determine if a description of the social, economic and environmental impacts of each major issue has been included.

Sufficient

V. UNANTICIPATED AND UNFORSEEN PROBLEMS AND OPPORTUNITIES THAT OCCURRED SINCE ADOPTION, INCLUDING A DESCRIPTION OF UNFORSEEN PROBLEMS/OPPORTUNITIES AND THEIR IMPACT ON THE PLAN (163.3191(2) (f))

The EAR has been reviewed to determine if a discussion of whether unforeseen changes in circumstances have created problems or opportunities related to each major issue has been included.

Sufficient

VI. EFFECT ON THE LOCAL COMPREHENSIVE PLAN; CONSISTENCY OF THE PLAN WITH THE STATE COMPREHENSIVE PLAN (CHAPTER 189, F.S.), STRATEGIC REGIONAL POLICY PLAN, RULE 9J-5 (F.A.C.) AND CHAPTER 163, F.S. (163.3191(2) (f))

The EAR has been reviewed to determine if this analysis has been included as stated in the title of this section.

Additional Information Needed: The adopted EAR does not include an analysis or discussion of how the City's Plan is consistent with the revised *Strategic Regional Policy Plan for South Florida (SRPP)* or what amendments are needed to be adopted to be consistent with the revised **SRPP**. The adopted EAR should include an analysis or discussion on the consistency of the City of Coral Gables Comprehensive Plan's with the *Strategic Regional Policy Plan for South Florida*, as revised on June 7, 2004. A document comparing the 1995 and 2004 *SRPPs* can be found on the Council's website, at <http://www.sfrpc.com/srpp.htm>. The review should include an identification of any amendments that are needed in the City's Comprehensive Plan to ensure that it is compatible with the *SRPP*.

VII. IDENTIFICATION OF ANY NEEDED ACTIONS TO ADDRESS THE PLANNING ISSUES RAISED IN THE REPORT (163.3191(2) (i))

The EAR has been reviewed to determine if this analysis has been included for the major issues.

Sufficient

VIII. IDENTIFICATION OF PROPOSED OR ANTICIPATED PLAN AMENDMENTS TO ADDRESS OR IMPLEMENT THE IDENTIFIED CHANGES (163.3191(2) (i))

The EAR has been reviewed to determine if plan amendments have been identified to address needed changes for the major issues.

Sufficient

IX. IDENTIFICATION OF CONCURRENCY MANAGEMENT AREA ACHIEVING ITS PURPOSE (163.3191(2) (o))

The EAR has been reviewed to determine if this analysis has been included as stated in the title of this section.

Additional Information Needed: In its transportation assessment the City has recommended that new policies be added to the comprehensive plan update related to the City's transportation concurrency area, the City's redevelopment and infill district, and traffic mitigation in this area. However, the City does not include data or analysis regarding these strategies or measure the effectiveness of the concurrency management system. The City should also include an analysis of its concurrency management system to assess the need to develop a methodology to measure jurisdictional and extra-jurisdictional traffic impacts to maintain its concurrency management system relating to transportation facilities. It is recommended that the City amend the Adopted EAR to include data and analysis pertaining to:

1. Whether or not the City's concurrency exception area achieved the purpose for which it was created.
2. Pursuant to 163.3180(10) F.S., the City should assess the need to develop a methodology to implement a concurrency management system in coordination with municipalities and Miami-Dade County.

See also the attached comments from the Florida Department of Community Affairs.

X. ESTABLISHING A COMMON METHODOLOGY FOR MEASURING TRANSPORTATION IMPACTS (163.3191) (o)

The EAR has been reviewed to determine if this analysis has been included as stated in the title of this section.

Sufficient

IX. MAJOR ISSUES

The City of Coral Gables Adopted EAR has Identified the Following Major Planning Issues:

- A. Revision of the Housing Element, to include provision of workforce housing and promotion of senior housing.
- B. Maintenance of single-family residential neighborhoods and mitigation of adjoining commercial and high-density residential uses.
- C. Mitigation of Traffic Impacts to include promotion of alternative modes of transportation and strengthening of intergovernmental coordination.
- D. Placement of parks according to the Parks Master Plan, to include the acquisition of new parks.

A detailed analysis has been performed for each issue area and is included below.

ISSUE A: REVISION OF THE HOUSING ELEMENT, TO INCLUDE PROVISION OF WORKFORCE HOUSING AND PROMOTION OF SENIOR HOUSING

A well-documented analysis has been included.

Sufficient

COMPARISON OF PLAN'S ADOPTED OBJECTIVES WITH ACTUAL RESULTS TO DETERMINE WHETHER THE OBJECTIVES HAVE BEEN ACHIEVED

A well-documented analysis has been included.

Sufficient

MAJOR PROBLEMS OF DEVELOPMENT, PHYSICAL DETERIORATION, LOCATION OF LAND USES AND THE SOCIAL AND ECONOMIC EFFECTS OF THE MAJOR PROBLEMS IDENTIFIED (163.3191(2) (e))

A well-documented analysis has been included.

Sufficient

UNANTICIPATED AND UNFORSEEN PROBLEMS AND OPPORTUNITIES THAT OCCURRED SINCE ADOPTION, INCLUDING A DESCRIPTION OF UNFORSEEN PROBLEMS/OPPORTUNITIES AND THEIR IMPACT ON THE PLAN (163.3191(2)(f))

A well-documented analysis has been included.

Sufficient

IDENTIFICATION OF ANY NEEDED ACTIONS TO ADDRESS THE PLANNING ISSUES RAISED IN THE REPORT (163.3191(2) (l))

A well-documented analysis has been included.

Sufficient

IDENTIFICATION OF PROPOSED OR ANTICIPATED PLAN AMENDMENTS TO ADDRESS OR IMPLEMENT THE IDENTIFIED CHANGES (163.3191(2) (l))

The EAR has been reviewed to determine if this analysis has been included.

Sufficient.

ISSUE B: MAINTENANCE OF SINGLE-FAMILY RESIDENTIAL NEIGHBORHOODS AND MITIGATION OF ADJOINING COMMERCIAL AND HIGH-DENSITY RESIDENTIAL USES.

The EAR has been reviewed to determine if this analysis has been included.

Sufficient

COMPARISON OF PLAN'S ADOPTED OBJECTIVES WITH ACTUAL RESULTS TO DETERMINE WHETHER THE OBJECTIVES HAVE BEEN ACHIEVED

A well-documented analysis has been included.

Sufficient

MAJOR PROBLEMS OF DEVELOPMENT, PHYSICAL DETERIORATION, LOCATION OF LAND USES AND THE SOCIAL AND ECONOMIC EFFECTS OF THE MAJOR PROBLEMS IDENTIFIED (163.3191(2) (e))

A well-documented analysis has been included.

Sufficient

UNANTICIPATED AND UNFORSEEN PROBLEMS AND OPPORTUNITIES THAT OCCURRED SINCE ADOPTION, INCLUDING A DESCRIPTION OF UNFORSEEN PROBLEMS/OPPORTUNITIES AND THEIR IMPACT ON THE PLAN (163.3191(2) (f))

A well-documented analysis has been included.

Sufficient

IDENTIFICATION OF ANY NEEDED ACTIONS TO ADDRESS THE PLANNING ISSUES RAISED IN THE REPORT (163.3191(2) (l))

A well-documented analysis has been included.

Sufficient

IDENTIFICATION OF PROPOSED OR ANTICIPATED PLAN AMENDMENTS TO ADDRESS OR IMPLEMENT THE IDENTIFIED CHANGES (163.3191(2) (l))

The EAR has been reviewed to determine if this analysis has been included.

Sufficient.

ISSUE C: MITIGATION OF TRAFFIC IMPACTS TO INCLUDE PROMOTION OF ALTERNATIVE MODES OF TRANSPORTATION AND STRENGTHENING OF INTERGOVERNMENTAL COORDINATION.

A well-documented analysis has been included.

Sufficient

COMPARISON OF PLAN'S ADOPTED OBJECTIVES WITH ACTUAL RESULTS TO DETERMINE WHETHER THE OBJECTIVES HAVE BEEN ACHIEVED

Sufficient

MAJOR PROBLEMS OF DEVELOPMENT, PHYSICAL DETERIORATION, LOCATION OF LAND USES AND THE SOCIAL AND ECONOMIC EFFECTS OF THE MAJOR PROBLEMS IDENTIFIED (163.3191(2) (e))

A well-documented analysis has been included.

Sufficient

UNANTICIPATED AND UNFORSEEN PROBLEMS AND OPPORTUNITIES THAT OCCURRED SINCE ADOPTION, INCLUDING A DESCRIPTION OF UNFORSEEN PROBLEMS/OPPORTUNITIES AND THEIR IMPACT ON THE PLAN (163.3191(2) (f))

A well-documented analysis has been included.

Sufficient

IDENTIFICATION OF ANY NEEDED ACTIONS TO ADDRESS THE PLANNING ISSUES RAISED IN THE REPORT (163.3191(2) (l))

A well-documented analysis has been included.

Sufficient

IDENTIFICATION OF PROPOSED OR ANTICIPATED PLAN AMENDMENTS TO ADDRESS OR IMPLEMENT THE IDENTIFIED CHANGES (163.3191(2) (l))

The EAR has been reviewed to determine if this analysis has been included.

Sufficient.

ISSUE D: PLACEMENT OF PARKS ACCORDING TO THE PARKS MASTER PLAN, TO INCLUDE THE ACQUISITION OF NEW PARKS.

A well documented analysis has been included.

Sufficient

COMPARISON OF PLAN'S ADOPTED OBJECTIVES WITH ACTUAL RESULTS TO DETERMINE WHETHER THE OBJECTIVES HAVE BEEN ACHIEVED

Sufficient

MAJOR PROBLEMS OF DEVELOPMENT, PHYSICAL DETERIORATION, LOCATION OF LAND USES AND THE SOCIAL AND ECONOMIC EFFECTS OF THE MAJOR PROBLEMS IDENTIFIED (163.3191(2)(e))

A well-documented analysis has been included.

Sufficient

UNANTICIPATED AND UNFORSEEN PROBLEMS AND OPPORTUNITIES THAT OCCURRED SINCE ADOPTION, INCLUDING A DESCRIPTION OF UNFORSEEN PROBLEMS/OPPORTUNITIES AND THEIR IMPACT ON THE PLAN (163.3191(2)(f))

A well-documented analysis has been included.

Sufficient

IDENTIFICATION OF ANY NEEDED ACTIONS TO ADDRESS THE PLANNING ISSUES RAISED IN THE REPORT (163.3191(2)(l))

A well-documented analysis has been included.

Sufficient

IDENTIFICATION OF PROPOSED OR ANTICIPATED PLAN AMENDMENTS TO ADDRESS OR IMPLEMENT THE IDENTIFIED CHANGES (163.3191(2) (l))

The EAR has been reviewed to determine if this analysis has been included.

Sufficient.

APPENDIX A

REVIEW AGENCY COMMENTS

In addition to the review by the South Florida Regional Planning Council, the adopted EAR was distributed to twelve different review agencies. Their comments have been attached.



STATE OF FLORIDA

DEPARTMENT OF COMMUNITY AFFAIRS

"Dedicated to making Florida a better place to call home"

JEB BUSH
Governor

THADDEUS L. COHEN, AIA
Secretary

June 21, 2006
CAD, BO, TM, CG
original



Coral
Gables
EAR

Ms. Terry Manning
South Florida Regional Planning Council
3440 Hollywood Blvd., Suite 140
Hollywood, FL 33021

Re: City of Coral Gables Adopted EAR – Delegated Review

Dear Ms. Manning:

The Department of Community Affairs has conducted a preliminary sufficiency review of the City of Coral Gables' Adopted Evaluation and Appraisal Report (EAR), adopted under Resolution No. 2006-92 on May 9, 2006. Department staff identified the following potential sufficiency issues, comments, and recommendations for your consideration:

Potential Sufficiency Issues

163.3191 (2) (a) Population growth and changes in land area, including annexation, since the adoption of the original plan or the most recent update amendments.

Staff Comment

The City presents adequate information on the historic population data and demographics from US Census sources over the 1990 to 2000 time frame. The City provides an intermediate population estimate for 2004 within the body of the Workforce/Affordable Housing Study presented as an exhibit in Appendix C. The City provided no citation authority for the intermediate population figure (such as University of Florida – BEBR, etc.).

Most critically, the City failed to identify population projections for the next planning period and makes no recommendations for accommodating the projected population with respect to land and infrastructure demands. The Housing Study does provide some analysis of future housing needs, but that does not address the other concurrency items and demands placed on those services.

Staff Recommendation

The EAR should be amended with data and analysis to:

1. Include a population projection for the next planning horizon
2. Provide recommendations for planning actions needed to accommodate the projected population during the next planning time frame with respect to land and infrastructure needs.

163.3191 (2) (c) The financial feasibility of implementing the comprehensive plan and of providing needed infrastructure to achieve and maintain adopted level-of-service standards and sustain concurrency management systems through the capital improvements element, as well as the ability to address infrastructure backlogs and meet the demands of growth on public services and facilities.

Staff Comment

The City identifies, in general terms, several demands on infrastructure Levels of Service (LOS) and their efforts at sustaining LOS through their Concurrency Management System (CMS) and Capital Improvement Program (CIP). In their matrix analysis of the Plan's Elements, the City identifies a few items they have accomplished and several proposed, but without any projected costs. The City indicates it maintains a five-year Capital Improvements Program, which is updated each year, though it did not present any portion of the CIE as data for review. The City presents insufficient data and analysis identifying the capital projects projected over the planning period that will address the achievement and maintenance of adopted LOS and does not identify the sources of funding to demonstrate financial feasibility.

Staff Recommendation

This is a critical portion of the EAR Report as it allows the local government to assess past financial management and capital budgeting practices that enabled or prevented the community from meeting its public facility needs. It provides an opportunity to assess and amend the policies and objectives guiding the community into the future to better enable the local government to provide its future infrastructure needs at the adopted LOS. To these ends the report is both retrospective and prospective and should include the following data and analysis:

1. The public facility needs that were projected for the past planning period (for roads, potable water, sewer, drainage, solid waste, recreation and open space) and included in the plan during EAR-based amendment. For roads, the EAR

- should list all the deficient roadways at the time of the previous EAR-based amendment;
2. A discussion of the extent to which the identified needs of the community were met in terms of achieving and maintaining the adopted LOS standard and whether the deficiencies were corrected or not corrected. If deficiencies occurred, and especially if they were prolonged, that would provide a good indication that the comprehensive plan was NOT financially feasible. The EAR should analyze and discuss why the deficiencies occurred (e.g. insufficient funding, inefficient growth pattern that fails to deliver resources efficiently, unexpected growth, or a catastrophic event that caused local government to divert funds to other needs), then make recommendations to help ensure that financial feasibility is achieved and maintained during the next five and ten year planning horizon.
 3. A discussion of the current condition of all public facilities in terms of capacity (including roadway LOS of all major roadways as partially provided in the current EAR);
 4. A discussion of the City's ability to fund the identified infrastructure needs of the community during the past planning period, particularly for those facilities subject to concurrency. The discussion should describe the financial management and capital budgeting programs implemented during the planning period that enabled the community to achieve and maintain the adopted level of service standards;
 5. A discussion of the hardships if any, that the City encountered, which hampered its' ability to address the infrastructure needs of the community;
 6. A projection of the capital facility needs for the next planning period for all facilities that concurrency is required. This projection should include the projected LOS standards for all major roadways in the community;
 7. A discussion of the financial planning and budgeting schedules that will enable the City to meet its projected capital facility needs for the five and ten year planning period. The discussion should include the identification of the sources of funding as well as the City's revenues and expenditures that will support the City's capital projects during the planning period. Please note: SB 360 adopted in 2005, has changed the requirements of the Capital Improvement Element. As an example, the CIE should identify a Capital Improvement Plan covering five years, with the first three years of projects having funds committed and years four and five having funds planned. The City must identify revenues or funding sources sufficient to support the projects identified and these projects should result from the objectives identified within the various elements of the Comprehensive Plan. The City should carefully review the changes to this critical element of the Comprehensive Plan for additional amendments to existing policies and objectives.

163.3191 (2) (k) The coordination of the comprehensive plan with existing public schools and those identified in the applicable educational facilities plan adopted pursuant to §1013.35. The assessment shall address, where relevant, the success or failure of the coordination of the future land use map and associated planned residential development with public schools and their capacities, as well as the joint decision-making processes engaged in by the local government and the school board in regard to establishing appropriate population projections and the planning and siting of public school facilities. For those counties or municipalities that do not have a public schools interlocal agreement or public school facilities element, the assessment shall determine whether the local government continues to meet the criteria of §163.3177(12). If the county or municipality determines that it no longer meets the criteria, it must adopt appropriate school concurrency goals, objectives, and policies in its plan amendments pursuant to the requirements of the public school facilities element, and enter into the existing interlocal agreement required by §163.3177(6)(h)2 and §163.31777 in order to fully participate in the school concurrency system.

Staff Comment

The City states "In May 2005, the State of Florida amended its growth management statutes to require that local governments establish and enforce concurrency requirements for the public schools and adopt public school facilities elements into their comprehensive land use plans. According to the new requirements, the public schools facilities elements and concurrency requirements must be adopted by no later than January 1, 2008, as established by the Florida Department of Community Affairs."

The City indicates in a summary of EAR-based amendments listed within the discussion of the Intergovernmental Coordination Element's Goals, Objectives, and Policies, that it will continue to participate in the Miami-Dade County School Board's Staff Working Group to address issues involving the Interlocal Agreement, new CLUP Educational Facilities Element, revised impact fee study, and joint use agreements.

The City presents no data or analysis on the effectiveness of the current objectives and the implementation mechanisms in the plan to achieve proper coordination of future land uses and residential development with the capacity and location of schools in the community except to state the "public schools serving the City of Coral Gables are all overcrowded."

Staff Recommendation

The EAR should be amended to include:

1. Assessment of the effectiveness of the current goals, policies, and objectives and their implementation mechanisms in the Comprehensive Plan to achieve proper coordination of future land uses and residential development with the capacity and location of schools within the community.

163.3191 (2) (m) If any of the jurisdiction of the local government is located within the coastal high-hazard area, an evaluation of whether any past reduction in land use density impairs the property rights of current residents when redevelopment occurs, including, but not limited to, redevelopment following a natural disaster. The property rights of current residents shall be balanced with public safety considerations. The local government must identify strategies to address redevelopment feasibility and the property rights of affected residents. These strategies may include the authorization of redevelopment up to the actual built density in existence on the property prior to the natural disaster or redevelopment.

Staff Comment

The City presented no data or analysis of this issue.

Staff Recommendation

The EAR should be amended to include:

1. Assessment of the extent to which redevelopment has been hampered by existing regulations and the creation of nonconforming land use densities.
2. Identify strategies to address redevelopment while balancing the rights of affected property owners against public safety considerations.

163.3191 (2) (o) The extent to which a concurrency exception area designated pursuant to §163.3180(5), a concurrency management area designated pursuant to §163.3180(7), or a multimodal transportation district designated pursuant to §163.3180(15) has achieved the purpose for which it was created and otherwise complies with the provisions of §163.3180.

Staff Comment

The City presented no analysis of this issue. The matrix evaluating the individual elements of the plan indicates the City adopted an Exception Concurrency Policy as well as an Infill and Redevelopment Policy, but presented no information on how these had achieved the purpose for which they were intended.

Ms. Terry Manning
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Staff Recommendation

The EAR should be amended to include:

1. The extent to which a concurrency exception area has achieved the purpose for which it was created and otherwise complies with the provisions of §163.3180.

163.3191 (2) (p) An assessment of the extent to which changes are needed to develop a common methodology for measuring impacts on transportation facilities for the purpose of implementing its concurrency management system in coordination with the municipalities and counties, as appropriate pursuant to §163.3180(10).

Staff Comment

The City presented no data or analysis of this issue.

Staff Recommendation

The EAR should be amended to include:

1. An assessment of the extent to which changes are needed to develop a common methodology for measuring impacts on transportation facilities for the purpose of implementing its concurrency management system in coordination with the municipalities and counties, as appropriate pursuant to §163.3180(10).

Should you have any questions regarding the Department's comments, please call Phil Shafer, Planner, at 850-921-3762

Sincerely,



Roger Wilburn
Regional Planning Administrator

RW/ps

Cc: Carolyn A. Dekle, Executive Director, South Florida Regional Planning Council