

City of Coral Gables Responses to the Department of Community Affairs Objection, Recommendation and Comment (ORC) Report

November 4, 2009

Comprehensive Plan



Responses were reviewed/approved at the following advertised public hearings:

Local Planning Agency/Planning and Zoning Board – November 4, 2009
City Commission (Transmittal Hearing) -2nd/Final Reading – November 17, 2009

DEPARTMENT OF COMMUNITY AFFAIRS
OBJECTIONS, RECOMMENDATIONS AND COMMENTS REPORT
FOR THE
CITY OF CORAL GABLES
PROPOSED AMENDMENT #09-1ER

September 11, 2009
Division of Community Planning

This report is prepared pursuant to Rule 9J-11.010, F.A.C.

City of Coral Gables responses to each Objection, Recommendation and Comment (ORC) is provided within the shaded text boxes

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INTRODUCTION

The following objections, recommendations and comments are based upon the Department's review of the City of Coral Gables #09-1ER proposed amendment to its Comprehensive Plan pursuant to s. 163.3184, Florida Statutes (F.S.).

The objections relate to specific requirements of relevant portions of Chapter 9J-5, Florida Administrative Code (F.A.C.), and Chapter 163, Part II, F.S. Each objection includes a recommendation of one approach that might be taken to address the cited objection. Other approaches may be more suitable in specific situations. Some of these objections may have initially been raised by one or more of the other external review agencies. If there is a difference between the Department's objection and the external agency advisory objection or comment, the Department's objection would take precedence.

Each of these objections must be addressed by the City and corrected when the amendment is resubmitted for our compliance review. Objections that are not addressed may result in a determination that the amendment is not in compliance. The Department may have raised an objection regarding missing data and analysis items, which the local government considers not applicable to its amendment. If that is the case, a statement justifying its non-applicability pursuant to Rule 9J-5.002(2), F.A.C., must be submitted. The Department will make a determination on the non-applicability of the requirement, and if the justification is sufficient, the objection will be considered addressed.

The comments that follow the objections and recommendations section are advisory in nature. Comments will not form a basis for a determination of non-compliance. They are included to call attention to items raised by our reviewers. The comments can be substantive, concerning planning principles, methodology or logic, as well as editorial in nature dealing with grammar, organization, mapping, and reader comprehension.

Appended at the end of the Department's ORC Report are the comment letters from the other state review agencies and other agencies, organizations and individuals. These comments are advisory to the Department and may not form bases of Departmental objections unless they appear under the "Objections" heading in this report.

TRANSMITTAL PROCEDURES

Upon receipt of this letter, the City of Coral Gables has 120 days in which to adopt, adopt with changes, or determine that the City will not adopt the proposed amendment. The process for adoption of local government comprehensive plan amendments is outlined in s. 163.3184, F. S., and Rule 9J-11.011, F.A.C. The City must ensure that all ordinances adopting comprehensive plan amendments are consistent with the provisions of Chapter 163.3189(2) (a), F.S.

Within ten working days of the date of adoption, the City must submit the following to the Department:

Three copies of the adopted comprehensive plan amendments;

A listing of additional changes not previously reviewed;

A listing of findings by the local governing body, if any, which were not included in the ordinance; and

A statement indicating the relationship of the additional changes to the Department's Objections, Recommendations and Comments Report.

The above amendment and documentation are required for the Department to conduct a compliance review, make a compliance determination and issue the appropriate notice of intent.

In order to expedite the regional planning council's review of the amendments, and pursuant to Rule 9J-11.011(5), F.A.C., please provide a copy of the adopted amendment directly to the Executive Director of the South Florida Regional Planning Council.

Please be advised that Section 163.3184(8) (c), F.S., requires the Department to provide a courtesy information statement regarding the Department's Notice of Intent to citizens who furnish their names and addresses at the local government's plan amendment transmittal (proposed) or adoption hearings. In order to provide this courtesy information statement, local governments are required by law to furnish the names and addresses of the citizens requesting this information to the Department. **Please provide these required names and addresses to the Department when you transmit your adopted amendment package for compliance review. In the event there are no citizens requesting this information, please inform us of this as well.** For efficiency, we encourage that the information sheet be provided in electronic format.

City of Coral Gables response:

No requests have been made for the Departments Notice of Intent.

OBJECTIONS, RECOMMENDATIONS AND COMMENTS REPORT

CITY OF CORAL GABLES

PROPOSED COMPREHENSIVE PLAN AMENDMENT #09-1ER

I. CONSISTENCY WITH CHAPTER 163, F.S., AND RULE 9J-5, F.A.C.

City of Coral Gables proposed Evaluation and Appraisal Report (EAR) based amendment; DCA #09-1ER was received on July 13, 2009. This EAR based amendment contains three (3) Future Land Use Map amendments, Capital Improvements Element annual update, the City's 10 Year Water Supply Facilities Work Plan and text amendments to fourteen (14) elements: 1) Administration, 2) Governance, 3) Future Land Use, 4) Design, 5) Community Facilities, 6) Housing, 7) Education, 8) Mobility, 9) Natural Resources, 10) Recreation and Open Space, 11) Historical Resources, 12) Public Safety, 13) Capital Improvements, and 14) Green Elements.

The Department has identified the following objections, recommendations and comments to the proposed comprehensive plan amendments as they do not meet all of the requirements in Chapter 163, F.S., and Rule 9J-5, F.A.C.

OBJECTIONS AND RECOMMENDATIONS

Future Land Use Element

Objection 1: The City's map titled "Comprehensive Land Use Map" dated May 2009 submitted with the City's amendments does not indicate whether it is an Existing or Future Land Use Map.

Citations: Sections 163.3177(5) (a) and (6) (a), F.S., and Rules 9J-5.005(1) (e), (4), 9J-5.006(1) and 9J-5.006(4), F.A.C.

Recommendation: Revise the Future Land Use Element to include the City's Existing Land Use Map and a Future Land Use Map which includes the year 2020 as the long range planning timeframe.

City of Coral Gables response:

1. The Planning Department has conducted research in regards to the City's history of utilizing existing land use maps to guide growth. Since, 1926, the City has historically only had a Future Land Use Map, but only once during the City's history has there been an existing land use map, which was a part of the City's 1989 Comprehensive Plan. The City discontinued the update of the existing land use map as a part of the DCA approved 1998 update of the Plan. The map was deleted for the following reasons:
 - The necessity to update the map as land uses continually changed resulted in significant staff resources to insure the map was up-to-date. The Planning Department is a small Department and has limited resources to continually verify changes in use City-wide. Most often the map was out of date and therefore was not usable.

- The existing land use map was confusing to property owners, citizens, etc. as to the purpose of the map. Users typically were confused which map was the map by which development applications were evaluated.

The Planning Department utilizes aerial maps, Google maps, etc. to identify current land uses. This has been effective to all users.

2. The Planning Department has included within the Comprehensive Plan reference to the year 2020 as the long range planning time frame.

Objection 2: The City has not included Existing and Future Land Use Maps showing natural resources located within the City, such as beaches and shores, including estuarine systems; bays; lakes and flood plains; wetlands; minerals; soils; areas subject to coastal flooding; wildlife habitat; vegetative cover; living marine resources; and coastal high hazard area. The City has not identified historic district boundaries, transportation concurrency management areas, and multimodal transportation district boundaries, if any such areas have been designated.

Citations: Sections 163.3177(1), (5)(a), (6)(a), (6)(d), (6)(g), 163.3178(2)(a), F.S., and Rules 9J-5.006(4), and 9J-5.012(2)(b), (3)(b)1, 2, 3, (3)(c)1, 2, 9J-5.013(2)(b)2, 3, 4, (2)(c)1, 2, 3, 5, 6, (3), F.A.C.

Recommendation: The Future Land Use Element should be revised to include the following natural resources on the Existing and Future Land Use Map or map series: beaches and shores, including estuarine systems; bays; lakes; flood plains; wetlands; minerals; soils; areas subject to coastal flooding; wildlife habitat; vegetative cover; and living marine resources. If any of these natural resources are not applicable to the City, then the City should indicated that these natural resources are not located in the City. Identify historic district boundaries, transportation concurrency management areas, and multimodal transportation district boundaries, if any such areas have been designated.

Include new or revised objectives and policies, if needed, to ensure the protection and conservation of any natural resources located in the City and as identified on the map or map series.

City of Coral Gables response:

1. The City has created a series of mapping that will be included in the Appendices to the adopted Comprehensive Plan document; this mapping shall be known as the "Comprehensive Plan Map Series (CPMS)." In response to the above DCA recommendations, the City has created new maps that will be included in the CPMS. These new maps are as follows:
 - Soils and minerals map.
 - Natural resources map which identifies estuarine systems, bays, lakes, wetlands.
 - Historic landmark districts map.
2. The City has no beaches.
3. The requested Transportation concurrency map known as the "Gables Redevelopment Infill District map, was included as a part (within the body/text of the Plan) of the DCA initial transmittal. For clarity purposes, this map shall be included in the CPMS within the Appendices.
4. With reference to other transportation concurrency management areas, the City utilizes the

most recent Miami-Dade County Metropolitan Planning (MPO) mapping, specifically the “Arterial Grid Analysis Location map”, “Arterial Grid Analysis Level of Service maps,” and “Miami-Dade County Transportation Plan maps for traffic management purposes. This mapping is easily obtained and available from the MPO and Miami-Dade County.

5. With reference to coastal flooding and flooding in general, the City utilizes Federal Emergency Management Agency (FEMA) issued flood maps, specifically the Flood Insurance Rate Maps (FIRM) to identify locations of both coastal and inland flooding. These maps are utilized to evaluate development projects as a part of the Planning review process and eventual building permit review process. These maps are on file and are also available for public use.
6. The City does not have a defined multimodal transportation district; however as is noted in the CP, the City has a very successful inner-city trolley system that is connected to the existing regional Miami-Dade County regional transportation system which includes both bus routes and the existing elevated fixed rail “Metro-Rail” system (intermodal station).
7. The City does have a Bicycle Facilities Plan and Map. This plan is referenced within the Mobility Element. The map will be included in the CPMS in the Appendices.

Housing Element

Objection 1: The City is deleting Housing Objective 3-1.6 and Policy 3-1.6.1 addressing the treatment of displaced residents. Therefore, the Housing Element does not address the requirements in Rule 9J-5.010, FAC., for an objective and policy providing provisions for relocation housing for displaced persons.

Citations: Sections 163.3177(6) (a), (f) e, 163.3177(9), F.S. and Rules 9J-5.003(82), (90), (106), 9J-5.005(2), 9J-5.010(3) (b) 6 and 9J-5.010(3) (c) 9, F.A.C.

Recommendation: Revise the Housing Element to retain Objective 3-1.6 and Policy 3-1.6.1 addressing the treatment of displaced residents and the provision of relocation housing. Alternatively, include a new objective and associated policies to address relocation housing. The objective must include the specific, measurable, intermediate end that is achievable and marks progress toward the goal. Policies must include meaningful and predictable standards to achieve the objective.

City of Coral Gables response:

The Housing Element has been revised to retain the deleted objectives and policies as recommended by DCA. See pages 5 and 6 of the Housing Element, Objective HOU-1.6 and Policy HOU-1.6.1.

Mobility Element

Objection: The City has not provided Existing and Future Transportation Maps or map series with the proposed amendment.

Citations: Sections 163.3177(1), (6) (a), and (6) (j), F.S. and Rules 9J-5.005(2), 9J-5.019(2) and (5), F.A.C.

Recommendation: Provide Existing and Future Transportation Maps or map series, that address the requirements in Rules 9J-5.019(2) and (5), F.A.C., with the adopted amendment.

City of Coral Gables response:

As is noted in response to Objection 2 above, the City shall include transportation mapping with the CPMS within the Appendices of the document.

Public Safety Element

Objection 1: The definition of the Coastal High Hazard Area in Public Safety Element Policy SAF 2.1.3 is inconsistent with the statutory definition of the Coastal High Hazard Area. The policy defines the Coastal High Hazard Area “as the entire Category 1 hurricane evacuation area as defined in the SFRPC study as amended” rather than as defined in Section 163.3178(2) (h), F.S. The City has not depicted the Coastal High Hazard Area, consistent with the statute definition, on the Future Land Use Map.

Citations: Sections 163.3177(6)(g), and 3178(2)(d), (2)(h), (9), F.S., and Rules 9J-5.006(4)(b)6, 9J-5.012(2)(e)3, F.A.C.

Recommendation: Revise Policy SAF 2.1.3 to include the statutory definition of the Coastal High Hazard Area as: “the area below the elevation of the category 1 storm surge line as established by a Sea, Lake, and Overland Surges from Hurricanes (SLOSH) computerized storm surge model.” Revise the Future Land Use Map to depict the Coastal High Hazard Area based on the statutory definition.

For Miami-Dade County and its municipalities, the most current data for the Coastal High Hazard Area is available in the August 2001 “Hurricane Storm Tide Atlas, Miami-Dade County, Florida” prepared by the U.S. Army Corps of Engineers, Jacksonville District. This atlas should be available from the Miami-Dade County Emergency Operations Director and the South Florida Regional Planning Council. This information can also be found at www.floridadisaster.org/gis/data. When the updated storm surge maps become available, the City will need to revise its comprehensive plan to include the new information.

City of Coral Gables response:

1. A separate map has been created and included within the CPMS that will indentify the Coastal High Hazard Area (CHHA).
2. Page 2 of the Public Safety Element, Policy SAF-2.1.3 has been revised to address State statues requirements (changes are noted in ~~strikeout~~double underlining format):

“Policy SAF-2.1.3. DEFINITION OF CHHA. The City ~~adopts~~ shall abide by the Coastal High Hazard Area (CHHA) as defined in F.S. Chapter 163 and Rule 9J 5.003 (19), as amended, as the entire Category 1 Hurricane evacuation area as identified in the SFRPC Study as amended. (3243)as the area below the elevation of the category 1 storm surge line as established by a Sea, Lake, and Overland Surges from Hurricanes (SLOSH) computerized storm surge model.”

Objection 2: The Public Safety Element Objective SAF 2.2 does not include the hurricane evacuation times that will be maintained or reduced. The objective does not meet the definition of an objective because it does not include the specific, measurable, intermediate end result that is achievable and marks progress toward the goal.

Citations: Sections 163.3177(6)(a), (g), (9) and 163.3178(2)(d), (2)(h) and (9)(a), (9)(b), and (9)(c), F.S., and Rules 9J-5.003(82), 9J-5.005(6), and 9J-5.012(2)(e)3, (3)(b)6 and 7, F.A.C.

Recommendation: Sections 163.3178(9) (a) and (9) (b), F.S., provide an option for local governments to comply with Rules 9J-5.012(3) (b) 6 and 7, F.A.C., if a local government adopted a level of service standard for an out of county hurricane evacuation time for a category 5 hurricane, or maintains a 12 hour evacuation time to a shelter with reasonable available shelter space, for a category 5 hurricane. If the local government did not establish a level of service standard for out of county hurricane evacuation time by July 1, 2008 and elects to utilize the option for complying with Rules 9J-5.012(3)(b)6 and 7, F.A.C., then the level of service standard shall be no greater than 16 hours for a category 5 storm event. Mitigation is permitted to achieve and maintain these standards.

The City did not adopt an out-of-county hurricane evacuation time for a category 5 hurricane by July 1, 2008, therefore, if, and it appears the City intends to comply with Rules 9J-5.012(3) (b) 6 and 7, F.A.C., rather than address these requirements through the option provided in Section 163.3178(9), F.S., then the City should establish an out-of-county hurricane evacuation time for a category 5 hurricane. If the current evacuation time is greater than 16 hours, policies to reduce or maintain the evacuation time are needed.

City of Coral Gables response:

The Public Safety Element has been revised to establish out-of-county hurricane evacuation provisions for a category 5 hurricane with the adopted amendment to comply with Rules 9J-5.012(3)(b)6 and 7. See page 2, Public Safety Element, Objective SAF-2.2 shall be amended as follows as noted below (changes are noted in ~~strikeout~~/double underlining format):

“Objective SAF-2.2. MANAGING HURRICANE EVACUATION TIMES: Assure that future development or redevelopment maintains or reduces hurricane evacuation times. The City establishes an out-of-county hurricane evacuation time for a category 5 hurricane of 16 hours. Mitigation is permitted to achieve and maintain these standards. This objective shall be achieved through the implementation of the following policies. (3243)”

Green Element

Objection 1: The City in its new Green Element proposes Objectives 1.2, 1.4 1.8, and Policies 1.2.2, 1.3.1, 1.3.3, 1.3.4, 1.3.8, 1.3.9, 1.3.11, 1.3.112, 1.4.1, 1.4.2, 1.4.4, 1.4.6, 1.4.7, 1.7.3, 1.7.4, 1.8.1. These objectives and policies describe future actions to be undertaken by the City or lack specificity because the use of phrases such as: “will seek to educate”, “will establish a policy to consider...”, “...encourages walkability”, “will strive to reduce greenhouse gas emissions”, “consider the purchase of alternative fuel vehicles”, “seek ways to encourage private parking”, “will seek to partner with Florida Department of Transportation”, “ designate a

City Department...”, “the City should track and analyze key indicators...”, “encourage water conservation” and “will seek to uphold green building and neighborhood standards...”.

The objectives listed above do not include the specific, measurable, intermediate end result to be achieved for energy efficiency and conservation of natural resources and the policies listed above do not include meaningful and predictable standards for achieving the objectives.

Citations: Sections 163.3177(6)(a), (c), (d), (f), and (9), F.S.; and Rules 9J-5.003(82), (90), 9J-5.005(6), 9J-5.011(2)(b)4, (2)(c)3, and 9J-5.013(2)(b)2, and (2)(c)1, F.A.C.

Recommendation: Revise the objectives to include the specific, measurable outcome the City intends to achieve through its Green Element. Revise the policies to include meaningful and predictable guidelines and standards that will be applied to development to achieve the objectives. The policies should identify the guidelines and standards the City can apply right away and include specific actions for implementing additional energy conservation measures that will take longer to implement.

City of Coral Gables response:

The Green Element will be revised to provide more specifics for the objectives and policies as noted in DCA’s recommendation. The revisions will include an identification of which objectives can be implemented immediately and which require longer timeframes. Based on DCA’s recommendation, the policies will be revised to remove, where applicable, phrases identified above that lack specificity and provide details regarding implementation. The Element has been revised to address this recommendation.

10-Year Water Supply Facilities Work Plan

Objection 1: The City’s new Natural Resources Element Policies 1.2.11 and 1.2.12 “encourage the use of sub-metering...” and “encourage the use of Florida Friendly Landscapes guidelines and principles...” The policies do not include meaningful and predictable standards for implementing the identified water conservation measures because the policies only “encourage” water conservation.

Citations: Sections 163.3177(6)(a), (c), (d), and (9), F.S.; and Rules 9J-5.003(90), 9J-5.005(6), and 9J-5.011(2)(b)4, (2)(c)3, and 9J-5.013(2)(b)2, and (2)(c)1, F.A.C.

Recommendation: Revise Natural Resources Element Policies 1.2.11 and 1.2.12 to require sub-metering and the use of Florida Friendly Landscape guidelines and principles or revise the policies to explain how the City will “encourage” the use of these water conservation measures.

City of Coral Gables response:

The Natural Resources Element will be revised to include more specific information as to how the City will “encourage” conservation measures as recommended by the DCA. Page 2 of the Natural Resources Element includes revision to Policy NAT-1.2.11 and Policy NAT-1.2.12 (changes are noted in ~~strikeout~~/double underlining format):

“Policy NAT-1.2.11. The City will ~~encourage~~ educate the development community on the water saving benefits of the use of sub-metering for all multi-unit residential development which will include: separate meter and monthly records kept of all major water-using functions such as cooling towers and individual buildings in all new and redeveloped multi-family residential projects.

Policy NAT-1.2.12. The City will ~~encourage~~ educate the development community on the water saving benefits of the use of Florida Friendly Landscapes guidelines and principles. The City will encourage through the use of educational materials, the use of the following techniques: ~~cutter downspouts, roof runoff, and~~ rain harvesting through the use of rain barrels and directing runoff to landscaped areas; drip irrigation or micro-sprinklers; and the use of porous surface materials (bricks, gravel, turf block, mulch, pervious concrete, etc) on walkways, driveways and patios.”

COMMENTS

Capital Improvements Element

Comment 1: The City’s new Capital Improvements Element Policy 9-5.1.3 incorporates the Miami-Dade County Public Schools Facilities Work Plan 2008-2009 through 2012-2013 by reference. If the City’s adoption hearing occurs after the School Board’s approval of its September 2009 Five Year District Facilities Work Plan, references to the updated Work Plan in the Public Education Facilities Element and Capital Improvements Element must be amended accordingly.

City of Coral Gables response:

The Capital Improvement Element will be revised to incorporate the updated Schools Facilities Work Plan as recommended by the DCA. Page 11 of the Capital Improvements Element includes revision to Policy CIE-5.1.3 (changes are noted in ~~strikeout~~/double underlining format):

“Policy CIE-5.1.34. The ~~Miami-Dade County Educational Facilities Plan and the Five-Year Facilities Work Program for 2009-10 through 2013-14~~ ~~Miami-Dade County Public Schools Facilities Work Plan for the period covering 2008/2009 to 2012/2013~~ will be evaluated on an annual basis to ensure that the LOS standards will continue to be achieved and maintained throughout the planning period. The City adopts the Work Program by reference.”

Comment 2: In March 2008, the City adopted its Educational Element and school related Policies 8-1.1.8 and 8-1.3.3 for the Intergovernmental Coordination Element, Objective 9-2.2 and Policies 9-1.2.1 (H), 9-1.3.3 (8), 9-1.3.6 and 9-2.2.1 for the Capital Improvements Element. The City has not included the objective and policies in the proposed EAR-based amendment, an apparent oversight. The City should include the omitted objective and policies in the final adopted version of the comprehensive plan.

City of Coral Gables response:

The Capital Improvement Element has been revised to incorporate the school related policies as recommended by the DCA (changes are noted in ~~strikeout~~/double underlining format):

1. Page 10 of the Capital Improvements Element was revised to include Objective CIE-2.2 as noted below:

“Objective CIE-2.2. Pursuant to Chapter 163, Florida Statutes, the Miami-Dade County Educational Facilities Plan and the Five-Year Facilities Work Program for 2009-10 through 2013-14 developed by Miami-Dade County Public Schools and adopted by the Miami-Dade County School Board, 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 LOS standard, including interim standards, will continue to be achieved and maintained. The City of Coral Gables, through its annual updates of the 5-year 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 LOS standards will continue to be achieved and maintained throughout the planning period.”

2. Page 5 of the Capital Improvements Element was revised to include the following language to Policy CIE-1.2.1(H) as noted below in ~~strikeout~~/underline format:

“Public School Facilities 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 district wide 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."

3. Page 8 of the Capital Improvements Element was revised to include the following language to Policy CIE-1.3.3(8) as noted below in ~~strike through~~/underline format:

"Educational Facilities. 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."

4. The Governance Element (formerly Intergovernmental Coordination) includes the adopted school related language as referenced in DCA's recommendation. Please refer to Policy GOV-2.3.8 (Page 3) and Policy GOV-2.5.3 (Page 5).

Comment 3: The Public Education Facilities Element data and analysis support document that is referenced in the amendment will soon be outdated. The Florida Department of Education staff is working with the Miami-Dade County School Board staff to produce an updated data and analysis document. If the updated data and analysis is available prior to the City's adoption hearing, then it should be referenced as the updated data and analysis to support the Public Education Facilities Element.

City of Coral Gables response:

Page 3 of the Public Education Element was revised to include the following language to Policy EDU-1.2.7 as noted below (changes are noted in ~~strike out~~/double underlining format):

"Policy EDU-1.2.7. Pursuant to Chapter 163, Florida Statutes, ~~the Miami-Dade County Public Schools 5-Year District Facilities Work Program,~~ Miami-Dade County Educational Facilities Plan and the Five-Year Facilities Work Program for 2009-10 through 2013-14 developed by Miami-Dade County Public Schools and adopted by the Miami-Dade County School Board ~~on September 5, 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 and/or concurrency service area maps 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~~ LOS standard will continue to be achieved and maintained. The City of Coral Gables, through its annual updates of the 5-year 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, Miami-Dade County Public Schools, and other local governments 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~~ LOS standards will continue to be achieved and maintained throughout the planning period."

10-Year Water Supply Facilities Work Plan

Comment 1: Proposed new Future Land Use Element policy in the City's proposed 10 Year Water Supply Facilities Work Plan is not included in the Future Land Use Element of the EAR based amendments. The new policy requires coordination of future land use changes with the availability of water supplies and facilities. The City should revise the EAR based Future Land Use Element to include the new policy.

City of Coral Gables response:

Page 8 of the Future Land Use Element was revised to include Policy FLU-1.4.5 as noted below (changes are noted in ~~strikeout~~/double underlining format):

"Policy FLU-1.4.5. The City, through the Land Development Regulations will coordinate the land uses and future land use changes with the availability of water supplies and water supply facilities."

Comment 2: Un-numbered new objective under Community Services and Facilities Element of the proposed Water Supply Plan differs from new Objective COM-5.2 in the Community Facilities Element of the EAR based amendments. The City should revise un-numbered new objective under Community Services and Facilities Element of the proposed Water Supply Plan to match the new Objective COM-5.2 in the Community Facilities Element.

City of Coral Gables response:

Page 7 of the adopted Community Facilities Element has been revised to reflect the same language as Objective COM-5.2 of the Water Supply Plan (changes are noted in ~~strikeout~~/double underlining format):

"Objective COM-5.2. The City of Coral Gables shall comply with its 10-year Water Supply Facilities Work Plan, as required by section 163.3177(6) (c), F.S. The Work Plan will be updated, at a minimum, every 5 years. The City of Coral Gables Water Supply Facilities Work Plan is designed to: assess current and projected potable water demands; evaluate the sources and capacities of available water supplies; and, identify those water supply projects, using all available technologies, necessary to meet the City's water demands for a 10-year period."

Comment 3: Un-numbered new policy under Community Services and Facilities Element of the proposed Water Supply Plan differs from new Policy COM-5.2.1 of the Community Facilities

Element of the EAR based amendments. The City should revise the Un-numbered new policy under Community Services and Facilities Element of the proposed Water Supply Plan to match the new Policy COM-5.2.1 of the Community Facilities Element of the EAR based amendments.

City of Coral Gables response:

Page 7 of the adopted Community Facilities Element has been revised to reflect the same language as Policy COM-5.2.1 of the Water Supply Plan (changes are noted in ~~strikeout~~/double underlining format):

“Policy COM-5.2.1. Comply with the 10-year Water Supply Facilities Work Plan and incorporate such work plan into the Coral Gables City’s Comprehensive Plan as an Appendix.”

Comment 4: Un-numbered policy 2 listed under the Natural Resources Element in the City’s 10 Year Water Supply Facilities Work Plan has not been included in the Natural Resources Element of the EAR based amendments. The City should revise the Natural Resources Element to include Un-numbered policy 2 listed under the Natural resources Element in the City’s 10 Year Water Supply Facilities Work Plan.

City of Coral Gables response:

Pages 1 and 2 of the Natural Resources Element was revised to include Policy NAT-1.2.7 as noted below (changes are noted in ~~strikeout~~/double underlining format):

“Policy NAT-1.2.7. The potable water network is an interconnected, countywide system, therefore, the City will cooperate with MDWASD to jointly develop methodologies and procedures for biannually updating estimates of system demand and capacity, and ensure that sufficient capacity to serve development exists. The City will prepare and submit a Water Conservation Plan to the County at the same time as the City submits the updated 5-Year Water Supply Facilities Work Plan.”

II. CONSISTENCY WITH CHAPTER 187, F.S.

The proposed amendment is inconsistent with the following provisions of Chapter 187, F.S., the State Comprehensive Plan:

Section 187.201(4), Housing, Policies (b) 1 and 3: Concerning the provision of affordable housing.

Section 187.201(6), Public Safety, Policies (b) 22 and 23: Local governments, in cooperation with regional and state agencies, should prepare advance plans for the safe evacuation of coastal residents, and adopt plans and policies to protect public and private property and human lives from the effects of natural disasters.

Section 187.201(7), Water Resources, Policies (b) 3, 5, 8, 9, 11, 13, and 14: Ensure that new development is compatible with existing local and regional water supplies, protect aquifers, promote water conservation, and preserve flood plains and wetlands.

Section 187.201(8), Coastal and Marine Resources, Policies (b) 4, 5, and 6: Protect coastal resources, marine resources, and dune systems from the adverse effects of development, develop and implement a comprehensive system of coordinated planning, management, and land acquisition to ensure the integrity and continued attractive image of coastal areas and encourage land and water uses which are compatible with the protection of sensitive coastal resources.

Section 187.201(9), Natural Systems and Recreational Lands, Policies (b) 1, 3, 4, and 7: Conserve forests, wetlands, fish, marine life, and wildlife to maintain their environmental, economic, aesthetic, and recreational values and protect and restore the ecological functions of wetlands systems to ensure their long-term environmental, economic, and recreational value.

Section 187.201(11), Energy, Policies (b) 1, 2, 4, 5, 6, 7, and 8: Promote energy conservation.

Section 187.201(15), Land Use, Policies (b) 2 and 6: Consider land use planning and its impacts on water quality, the availability of land, water, and other natural resources to meet demand; and the potential for flooding.

Section 187.201(19), Transportation, Policies (b) 2, 3, 7, 8, 9, 10, 11, 13, 14, and 15: Ensure an efficient, coordinated transportation system, including mass transit and multi-modal systems.

Section 187.201(25), Plan Implementation, Policies (b) 3 and 7: Ensure that local plans implement and accurately reflect State goals and policies.

By addressing the concerns noted in Section I., these inconsistencies with Chapter 187, Florida Statutes, can be addressed.

Miami-Dade County Comments:

The following information/response is provided as a courtesy response to the comments received from the Miami-Dade County Planning and Zoning Department, although they were received after the State mandated 60 day review period.

Future Land Use Element

1. Policy FLU-1.1.5, Page 3 of Future Land Use Element (FLUE): All of the various Commercial and Industrial categories have FARs listed with the exception of the Mixed Use Districts, which have only percentages of FAR that individual uses must meet. Without knowing the minimum and maximum FARs for this category, the impact of the percentages is difficult to assess. It is stated that the FAR ranges is located in the Zoning Code for these Mixed Use Districts; however, since the FARs for most categories listed in this Element, it would be consistent, and user friendly, to also list the FARs for the Mixed Use category.

City of Coral Gables response:

The City's mixed use district referenced as the "Mixed Use Overlay District (MXOD) is a voluntary "overlay" zoning district. The maximum allowable FAR is provided for and referenced in the City Zoning Code. The City is of the opinion that the current provisions which provide for percentages of mixed uses is the appropriate threshold for the Comprehensive Plan per the approval of the DCA in 2004. Therefore, mixed use FAR's is more appropriate in the City's Zoning Code.

2. The Downtown Overlay District shown on the Future Land Use Map (FLUM) is not referenced in the text of the FLUE. Such map categories should be addressed in this Element if on the FLUM legend.

City of Coral Gables response: Reference has been included in the Comprehensive Plan text.

Community Facilities Element

1. Policy COM-5.2.4, page 6: Please revise this policy as follows: "Additional coordination efforts will occur between WASD and the City through the water allocation system, ~~which is a monthly spreadsheet used.~~ Monthly building permit data will be provided to WASD to track development activity within the City. The City will monitor proposed amendments to the Miami-Dade County Comprehensive Development Master Plan as they relate to water supply planning and provide input as necessary.

City of Coral Gables response:

Page 8 of the Community Facilities Element and page 16 of the Water Supply Facilities Work Plan were revised as noted (changes are noted in ~~strikeout~~/double underlining format):

“Policy COM-5.2.4: The City shall coordinate with Miami-Dade County WASD by requiring applications to be reviewed by WASD during the site plan review process prior to approving a Building Permit, in order to determine whether adequate water supplies will be available to serve the development by the anticipated issuance date of the certificate of occupancy for properties located within the City of Coral Gables. Additional coordination efforts will occur between WASD and the City through the water allocation system, ~~which is a m~~ Monthly spreadsheet used for tracking Building Permit data will be provided to WASD to track development activity within the City. The City will monitor proposed amendments to the Miami-Dade County Comprehensive Development Master Plan as they relate to water supply planning in the South Miami area and provide input as necessary.”

Mobility Element

1. Policy MOB-2.1.1, page 2: This Policy provides for 20% of non-State roads within the City’s designated Special Transportation Areas (STA) to operate below Level of Service (LOS) E. This 20% of non-State roads could include County roads and the Policy does not indicate a minimum LOS standard at which these roads should operate. This Policy should be revised to ensure that the City applies, to County roads within the STA, LOS standards that are consistent with the County’s adopted LOS standards for those roads. Otherwise, County roads should also be excluded from this 20% provision.

City of Coral Gables response:

Page 2 of the Mobility Element was revised as noted below (changes are noted in ~~strikeout~~/double underlining format):

“~~Policy MOB-2.1.1. MINIMUM ROADWAY LOS STANDARDS.~~ The minimum or lowest quality acceptable peak-period* operating ~~Level of Service (LOS)~~ standards for State Principal Arterial, Minor Arterial, County Minor Arterial, ~~and County~~ and City Collector roads within the City of Coral Gables shall be as ~~herein established:~~ (3243)

~~Beginning January 1, 1995, the minimum acceptable peak-period LOS standard: shall be the following:~~

- *Where ~~no public mass~~ public transit service does not exist, roadways shall operate at or above LOS E; ~~in within the Special Transportation Area~~ STA's (STA) twenty (20%) percent of non-State roads may operate below LOS E. All County roads within the STA will maintain LOS standards consistent with the County adopted standards.*
- *Where ~~mass~~ public transit service having headways of twenty (20) minutes or less is provided within ~~two (2)~~ 1/2 mile distance, roadways shall operate at no greater than one-hundred twenty (120%) percent of their capacity;*
- *Where ~~extraordinary~~ commuter rail or express bus public transit service ~~such as commuter~~*

~~rail or express bus service~~ exists, generally parallel roads within 2 miles ½ mile shall operate at no greater than one-hundred fifty (150%) percent of their capacity.

Peak period means the average of the two highest consecutive hours of traffic volume during a weekday.

2. Policy MOB-2.4.2, page 6: This Policy should be revised to replace the reference to “traffic circulation element” with “Mobility Element”.

City of Coral Gables response:

Page 7 of the Mobility Element was revised as noted below (changes are noted in ~~strikeout~~/double underlining format):

“Policy MOB-2.4.2. MAINTAIN CONSISTENCY AMONG COMPREHENSIVE PLAN ELEMENTS. The City shall maintain consistency between the adopted Mobility ~~traffic circulation~~ element policies and other adopted policies of the Comprehensive Plan.”

Natural Resources Element

1. Policy NAT-1.2.9, page 2: Revise this Policy to indicate that the City will enforce water use efficiency techniques for indoor water use in accordance with Section 8-31, 32-84 and 8A-381 of the Code of Miami-Dade County.

City of Coral Gables response:

Page 2 of the Natural Resources Element was revised as noted below (changes are noted in ~~strikeout~~/double underlining format):

“Policy NAT-1.2.9. The City will enforce Miami-Dade County’s Water Use Efficiency Standards Ordinance adopted on February 5, 2008, and amended by Ordinance on September 2, 2008. All future development within the City will be required to comply with water use efficiency techniques for indoor water use in accordance with Section 8-31, 32-84 and 8A-381 of the Code of Miami-Dade County. In addition, the future development will be required to comply with the landscape standards in Section 18-A and 18-B of the Miami-Dade County Code.”

2. Policy NAT-1.2.12, page 2: Please revise this Policy to include language indicating the City will enforce the landscape standards in sections 18-A and 18-B of Miami-Dade County Code.

City of Coral Gables response:

Policy NAT-1.2.9 was revised to incorporate this comment. Please see revised policy.

Capital Improvements Element

1. Policy CIE-5.1.2, page 7: Please revise this Policy as follows: “Furthermore, the City of Coral Gables will be responsible for providing monthly building permit data to WASD to be used for monitoring the availability of water supplies for all water users of the Miami-Dade County Water and Sewer Department, and for implementing a system that links water supplies to the permitting of new development.”

City of Coral Gables response:

Page 11 of the Capital Improvement Element was revised as noted below (changes are noted in ~~strikeout~~/double underlining format):

“Policy CIE-5.1.2. Appropriate mechanisms will be developed and adopted consistent with the South Florida Water Management District and Miami-Dade County in order to assure that adequate water supplies are available to all water users and to ensure that adequate water supply is available prior to approval of a building permit. Furthermore, City of Coral Gables will be responsible for providing monthly building permit data to MDWASD to be used for monitoring the availability of water supplies for all water users of the Miami-Dade County Water and Sewer Department within the City limits, and for implementing a system that links water supplies to the permitting of new development.”

General Comment

1. Throughout the revised Comprehensive Plan, there are still references to Metro-Dade County, or Dade County. Please revise those references to read Miami-Dade County.

City of Coral Gables response:

References to Metro-Dade County or Dade County were revised throughout the document as recommended.

Other Agency Review Recommendations and Comments.

The City of Coral Gables pursuant to State requirements forwarded the CP update to the following State and regional review agencies for comment:

1. Florida Department of Education.
2. Florida Department of Environmental Protection (DEP).
3. Florida Department of Transportation, District Six (FDOT).
4. Florida Department of Historical Resources.
5. South Florida Regional Planning Council.
6. South Florida Water Management District.
7. Miami-Dade County Planning and Zoning

All agency comments have been addressed and included within the CP update. In summary the agencies had the below listed comments:

1. Florida Department of Education. This Department provided two comments relative to revisions to the Capital Improvements Element (CIE) of the CP. These comments were addressed and the CIE was modified to satisfy the requested changes.
2. Florida Department of Environmental Protection (DEP). The DEP noted they *"Found no provision that requires comments, recommendation or objection under the laws that form the basis of the Department's jurisdiction and authority."*
3. Florida Department of Transportation, District Six (FDOT). FDOT indicated *"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."*
4. Florida Department of Historical Resources. The Department comments are as follows:
"The Future Land Use Element provides for the protection of historic resources and sensitive reuse of the resources. The new Design Element encourages the preservation of the City's architectural heritage. The Mobility Element (aka Traffic Circulation) preserves the Historic roadways from the 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 Historic Resources Element within its comprehensive plan. This element has been updated to reflect the rewritten zoning code. In this element, major topics provides for the provisions for increasing locally designated resources, increasing public outreach, identifying the impacts of development on historic resources, and providing economic incentives to property owners."
5. South Florida Regional Planning Council (SFRPC). The amendments were reviewed by the Regional Council Staff and Regional Planning Council (elected officials designated by local governments). The SFRPC noted *"Council action pursuant to Chapter 163, Florida Statutes, found the amendments to be generally consistent with the Strategic Regional Policy Plan for South Florida, the Council, by the same motion, approved the transmittal of the enclosed agenda item to the Florida Department of Community Affairs."*

6. South Florida Water Management District (SFWMD). The District noted *“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.”*
7. Miami-Dade County Planning and Zoning. MDPZD comments were received after the State mandated review time period; however, staff has addressed each comment provided.

Copies of all agency comments are provided herein.

FLORIDA DEPARTMENT OF EDUCATION



STATE BOARD OF EDUCATION

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Commissioner of Education



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

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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



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



Florida Department of Transportation

CHARLIE CRIST
GOVERNOR

1000 NW 111 Avenue
Miami, Florida 33172-5800

STEPHANIE C. KOPELOUSOS
SECRETARY

August 11, 2009

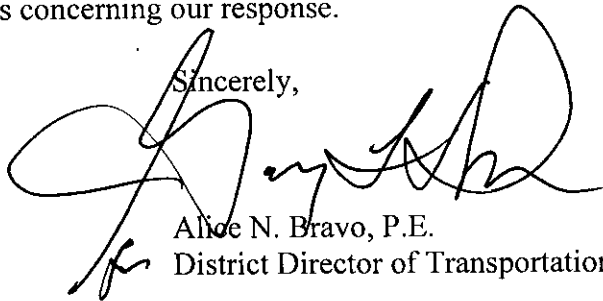
Mr. Ray Eubanks
Division of Community Planning
Florida Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

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



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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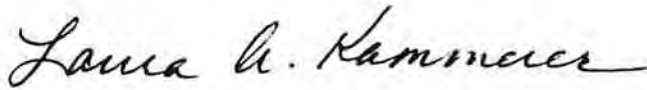
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☒ Historic Preservation
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Mr. Eubanks
August 11, 2009
Page 2

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". The signature is written in black ink and is positioned above the printed name and title.

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

xc: Mr. Bob Dennis



MEMORANDUM

AGENDA ITEM #4b

DATE: AUGUST 3, 2009

TO: EXECUTIVE COMMITTEE

FROM: STAFF

SUBJECT: CITY OF CORAL GABLES PROPOSED COMPREHENSIVE PLAN AMENDMENT

Introduction

On July 13, 2009, Council staff received proposed amendment #09-1ER to the City of Coral Gables Comprehensive Plan for review of consistency with the *Strategic Regional Policy Plan for South Florida (SRPP)*. Staff review is undertaken pursuant to the Local Government Comprehensive Planning and Land Development Regulation Act, Chapter 163, Part II, Florida Statutes (F.S.), and Rules 9J-5 and 9J-11, Florida Administrative Code (F.A.C.).

Community Profile

The City of Coral Gables is approximately 14 square miles in size. It is located in the southeast corner of Miami-Dade County immediately south and west of the City of Miami. The southern portion of the City is adjacent to Biscayne Bay. The Cities of West Miami, South Miami, Palmetto Bay and Pinecrest and a small portion of the unincorporated area abut the City's western boundary. Coral Gables was incorporated in 1925, and its estimated 2008 population is approximately 45,798 residents, with a density of 3,271 persons per square mile. The City is predominantly residential and development consists primarily of single-family homes. The City also serves as Latin American headquarters for numerous multinational firms, consulates, and trade offices. Coral Gables has actively pursued and engaged in the preservation of the City's historic resources since the adoption of its Historic Preservation Ordinance in 1973. The Historic Preservation Ordinance has helped place a number of the City's historical properties on the National Register of Historic Places. A general location of the City is shown in Attachment 1.

Summary of Staff Analysis

Proposed Amendment #09-1ER contains the Evaluation and Appraisal Report (EAR)-based text amendments to the City of Coral Gables Comprehensive Plan, the annual update to the Capital Improvement Element (CIE), the 10-Year Water Supply Facilities Work Plan, and three changes to the Future Land Use Map. The City's EAR was found sufficient on September 7, 2007, by the Florida Department of Community Affairs (DCA).

EAR-Based Comprehensive Plan Amendments

In 1998, the State of Florida revised the statutory requirements for EARs to allow local governments to base their analysis on the key local issues they are facing to further the community's goals consistent with statewide, minimum standards. The Report is not intended to require a comprehensive rewrite of the Elements within the local plan, unless a local government chooses to do so. The City of Coral Gables 2006 EAR identified the following specific issues to be addressed through EAR-based amendments:

1. Complete Rewrite of Housing Element. Revision of the Housing Element to include provision of workforce housing and promotion of senior housing.
2. Maintenance of Single-Family Residential. Maintenance of single-family residential neighborhoods and mitigation of adjoining commercial and high-density residential uses.
3. Mitigation of Traffic Impacts. Mitigation of traffic impacts to include promotion of alternative modes of transportation and strengthening of intergovernmental coordination.
4. Placement of Parks per the City's Master Plan. Placement of parks according to the Parks Master Plan, to include the acquisition of new parks.

All Elements of the City of Coral Gables Comprehensive Plan would be amended and updated in accordance with the amendments identified in the EAR, including a response to changes to State Statutes, the Florida Administrative Code, and the *Strategic Regional Policy Plan for South Florida (SRPP)*. In addition, the City renamed and reorganized three Elements in the Comprehensive Plan and created four new Elements, to be known as the Administration, Design, Public Safety, and Green Elements.

The City of Coral Gables Commission unanimously approved the proposed amendment at its July 7, 2009 meeting.

Staff analysis confirms the proposed EAR-based amendments are compatible with the Goals and Policies of the *Strategic Regional Policy Plan for South Florida*.

Summary of EAR-Based Text Changes and Newly Created Elements

The update of the existing Comprehensive Plan includes modifications to the Goals, Objective and Policies of the Plan, as well as the creation of four new Elements. The updated Comprehensive Plan has a total of 14 Elements. The key proposed changes and the new Elements are summarized below (in the order of the proposed City of Coral Gables Comprehensive Plan).

Administration Element (New)

This would be a new Element of the Comprehensive Plan and is not required by the Florida Statutes. The purpose of the Element is to provide interpretation and implementation guidelines for administering the Goals, Objectives and Policies as adopted by this updated Comprehensive Plan. The Element would include:

- Implementation guidelines, such as funding and coordination efforts; and
- Procedures for monitoring and updating the Comprehensive Plan on a regular basis, in accordance with State Statutes and local regulations.

Governance Element (Former Intergovernmental Coordination Element)

This Element would include changes recommended in the EAR, as well as additional Policies related to the governance of the City. The key changes include:

- New Policies to address public outreach and participation strategies, including communication between City boards and Elected Officials;
- Policies to address development review and strategies for education on planning topics;
- Coordination efforts regarding transportation, water distribution, design and development, annexation, bays, estuaries and harbors, and school planning, are outlined for interdepartmental efforts throughout City departments, as well as with other jurisdictions and agencies; and
- Provisions for monitoring and evaluating the Comprehensive Plan through review of measurable Objectives and the EAR process.

Future Land Use Element

This Element would be updated to include changes recommended in the EAR. The proposed changes would reorganize the chapter by bringing the land use classification section to the beginning of the Element in a table format to improve clarity. The key changes include:

- Updates to land use classifications for consistency with the City's newly revised Zoning Code, without changing intensities and densities. Specifically, this update removes the floor/story provisions and replaces them with a height measurement;
- New Policies to support recently adopted ordinances and policies such as the updated historic preservation ordinance and intergovernmental coordination efforts;
- New Policies to encourage development where appropriate while protecting residential uses from potential impacts of adjacent, non-residential uses; and
- Updates to annexation coordination Policies to be consistent with current practices and requirements of the City.

Design Element (New)

This would be a new Element of the Comprehensive Plan and is not required by the Florida Statutes. The purpose of the Element is to provide design principles that preserve and promote the City's historic, Mediterranean character of architecture. The Element would include:

- Provisions for the support of the City's design review guidelines, standards and incentives process via the City's Zoning Code;
- Policies to support development in a uniform, architectural style for historic preservation and to preserve and maintain the high quality of the built environment of the City for future generations; and
- Policies to address the aesthetic quality of the built environment.

Community Facilities Element (Former Public Facilities Element)

This Element would include changes recommended in the EAR, as well as additional Policies related to water supply planning. The key changes include:

- *Sanitary Sewer*. Policies were revised indicating that the City will continue to monitor where septic systems exist and to provide sewer lines to all non single-family and multi-family areas as financially feasible;
- *Solid Waste*. Language was updated as it relates to coordinating with Miami-Dade County DERM on maintaining a list of hazardous material use and storage in the City;

- *Drainage.* The adopted Level of Service (LOS) Standard was revised to modernize the language and to update the on-site retention requirements; and
- *Water.* New Objectives and Policies were added to address water supply planning requirements. The adopted LOS Standard was revised to address new growth management requirements for future water supply planning and to adjust the gallons per capita per day to a level that is inline with the County standards and closer to the actual usage rate within the City.

Housing Element

This Element would include changes recommended in the EAR to reinforce the City's commitment to continue participation in regional intergovernmental efforts to address affordable housing needs. Key changes include:

- Commitment to update the City's 2006 Workforce/Affordable Housing Study (WAHS) by 2010 to determine its affordable housing needs;
- Commitment to update the City's Zoning Code by 2011 to provide for affordable housing programs to address the City's fair-share of regional affordable housing needs using the updated WAHS study as background data and analysis; and
- Provisions to promote a mix of housing types and incomes while preserving the character of the neighborhoods and strengthen historic preservation efforts.

Education Element

This Element was recently adopted by the City Commission on March 25, 2008, and, therefore, the included proposed changes are minor (including correcting scrivener's errors, renumbering, and clarification of provisions).

Mobility Element (Former Traffic Circulation Element)

This Element would include changes recommended in the EAR, as well as additional policies related to maintaining and enhancing an interconnected, multi-modal, transportation system consisting of vehicular, transit, bicycle, and pedestrian options. Key changes include:

- New Policies that support the expansion and further continuing the successful City-sponsored trolley system;
- New Policies to promote a pedestrian-oriented environment through quality design, improved connectivity/access, and heightened safety considerations; and
- Provisions to encourage and further elaborate on the City's coordination, communication, and cooperation with adjacent municipalities, Miami-Dade County, and regional and state agencies on transportation issues.

Comment

During the EAR process, the City identified four roadway segments operating below their adopted Level of Service (LOS) Standards. The Council recommended that the City create a Transportation Master Plan to develop mitigation measures specific to the failing roadway segments and identify funding sources for transportation improvement projects in the Capital Improvements Element. This issue is not addressed in the current version of the Comprehensive Plan; however, Council staff discussed this issue in a meeting with the City's Planning Department Director and consultant on July 17, 2009, and found it was an omission during production. The City will include the following Policy in the adopted version of the Comprehensive Plan:

Policy MOB-1.1.9. *The City shall undertake a Transportation Master Plan by 2011 to specifically identify roadways within the City that are projected to fail the adopted LOS standards, as well as short and*

long term multi-modal and policy oriented mitigation measures. Each project shall have an estimated probable cost associated with it to assist in determining a financially feasible Capital Improvements Element.

Natural Resources Element (Former Conservation Element and Coastal Management Element)

This Element is a combination of the former Conservation Element and Coastal Management Element. The purpose of the Element is to support the conservation and maintenance of the City's natural resources. It would include Policies to regulate development and other potential harmful effects on the environment as they relate to air, water, waste management, wildlife and native vegetative communities, coastal resources, and historical resources. Key changes include:

- New Policies related to water conservation efforts to support regional, water supply planning efforts;
- Revisions to strengthen the protection of coastal zones, canals, waterways, and historic sites; and
- A provision related to the management and protection of aquifer recharge areas.

Recreation and Open Space Element

This Element would include changes recommended in the EAR by revising Level of Service Standards based on a service radius (i.e., 5 minute walk, 10 minute walk, 15 minute drive, etc.) rather than a specific number of facilities per 1,000 residents. A new Policy would support the update of the City Parks Master Plan by 2011, and to maintain its accreditation by the Commission for Accreditation of Park and Recreation Agencies (CAPRA).

Historical Resources Element

This Element would include changes recommended in the EAR and to reflect the newly re-written Zoning Code. The changes would be for the purpose of enhancing historical, cultural, and heritage related programs, projects, and activities. The Policies related to Transfer of Development Rights would be strengthened for the City to promote historic preservation.

Public Safety Element (Former Coastal Management Element)

This Element would include changes recommended in the EAR, as well as additional Policies related to emergency and safety service providers including police, fire, medical, and health services. This Element also addresses new topics such as emergency planning and public safety outreach efforts, in addition to coastal management principles such as the definition of the Coastal High Hazard Area, post-disaster redevelopment planning, and shoreline planning issues.

Capital Improvements Element

This Element would include changes recommended in the EAR to be consistent with the annual CIE update requirements per Section 163.3177, Florida Statutes. New Goals and Policies would provide for monitoring facility needs of the community, and ensuring that deficiencies and improvements, identified in the other Elements of the Comprehensive Plan, are programmed. The Element would be updated to reflect all proposed revisions to Level of Service Standards as identified throughout the Plan.

Green Element (New)

This would be a new Element of the Comprehensive Plan and is not required by the Florida Statutes. This Element will promote conservation of natural resources and at the same time introduce strategies to reduce the emission of greenhouse gases within the City. Strategies include incentives to developers to

utilize “green” technology and site design when constructing new buildings, increase the tree canopy within the City, conserve energy and water within City-owned facilities, promote energy-efficient land use patterns, increase recycling efforts, and increase partnerships with neighboring municipalities and regional planning bodies to increase awareness of green development goals within the greater Miami area.

Comment

The City of Coral Gables is one of a few local governments in the Region that have introduced “green” concepts and extensively discuss “green” strategies and initiatives in the Comprehensive Plan. Council staff agrees that this proposed Element will provide a solid base for the City to promote energy-efficient land use patterns and green development, and is an excellent model for other local governments.

Staff analysis confirms that the proposed EAR-based amendments are compatible with and supportive of the Goals and Policies of the *Strategic Regional Policy Plan for South Florida*.

Water Supply Planning

The text amendments in this proposed package have been transmitted pursuant to 2005 Growth Management legislation. Chapter 163.3177(6)(c) of the Florida Statutes requires local governments to adopt a Water Supply Facilities Work Plan (Work Plan) into their Comprehensive Plan within 18 months after the jurisdictional Water Management District approves a Regional Water Supply Plan or its update. The *Lower East Coast Water Supply Plan (LECWSP) Update* was approved by the South Florida Water Management District (SFWMD) on February 15, 2007. Therefore, the deadline for local governments within the Lower East Coast jurisdiction to adopt a Work Plan was August 15, 2008.

The Work Plan is intended for local governments to identify and plan for water supply facilities and sources needed for existing and new development or population. The emphasis on the preparation of the Work Plan is to coordinate local comprehensive planning with the Regional Water Supply Plan, as well as promote coordination among local governments, the SFWMD, and water supply utilities within and across local government jurisdictions. The Work Plan should address the following related to water supply planning: regional and local issues; current and projected population; water supply and demand; Level of Service (LOS) standards; conservation and reuse; alternative water supplies (AWS); and capital improvement updates for implementation.

The Goals, Objectives, and Policies (GOPs) of a local government’s Comprehensive Plan are required to reflect adoption and content of the Work Plan. The Infrastructure, Capital Improvements, Intergovernmental Coordination, Conservation, and Future Land Use Elements may need to be revised for consistency with water supply planning.

10-Year Water Supply Facilities Work Plan (Work Plan)

The City of Coral Gables receives potable water from the Miami-Dade County Water and Sewer Department (MDWASD) through a retail service agreement [See Attachment 2]. Since the City is dependent upon MDWASD for current and future water supply needs, the City Work Plan has been drafted for consistency with the Miami-Dade’s County 20-Year Work Plan (found in compliance by the Department of Community Affairs on July 18, 2008). The City Work Plan provides data and analysis on current and projected water supply and demand through 2020, describes local and regional conservation and reuse initiatives, and identifies its provider’s capital improvements.

In its Work Plan, the City revised the adopted Level of Service Standard (LOS) for potable water from 294 gallons per day (gpd) per capita to 165 gpd given the fact that: 1) it is much higher than actual average daily demand of 156 gallons per capita per day and 2) the City is experiencing a downward trend that is

expected to continue due to area-wide, mandatory, water restrictions in conjunction with other water conservation measures.

The City's Work Plan would be incorporated into the Comprehensive Plan as a sub-element of the Community Services and Facilities Element. In addition, new and revised Objectives and Policies will be incorporated to ensure consistency with the Work Plan.

Comment

The proposed revision of the potable water LOS Standard (165 gpd) is slightly higher than the standard of 155 gpd per capita used by its water provider (Miami-Dade County). Staff recommends that the City coordinate with Miami-Dade County to make sure the proposed LOS standard can be achieved.

Staff analysis confirms that the proposed amendments related to water supply planning are compatible with and supportive of the Goals and Policies of the *Strategic Regional Policy Plan for South Florida*.

Changes of Future Land Use Map (FLUM) Designations

The City also proposes changes to the Future Land Use Map (FLUM), including readopting it in its entirety. Three (3) City-owned properties (totaling approximately 0.95 acres) would be amended to reflect current uses and correct inconsistencies between the existing Zoning Map classifications and the existing Future Land Use Map classifications. The table below summarizes the proposed changes and existing uses for each parcel [See Attachment 3].

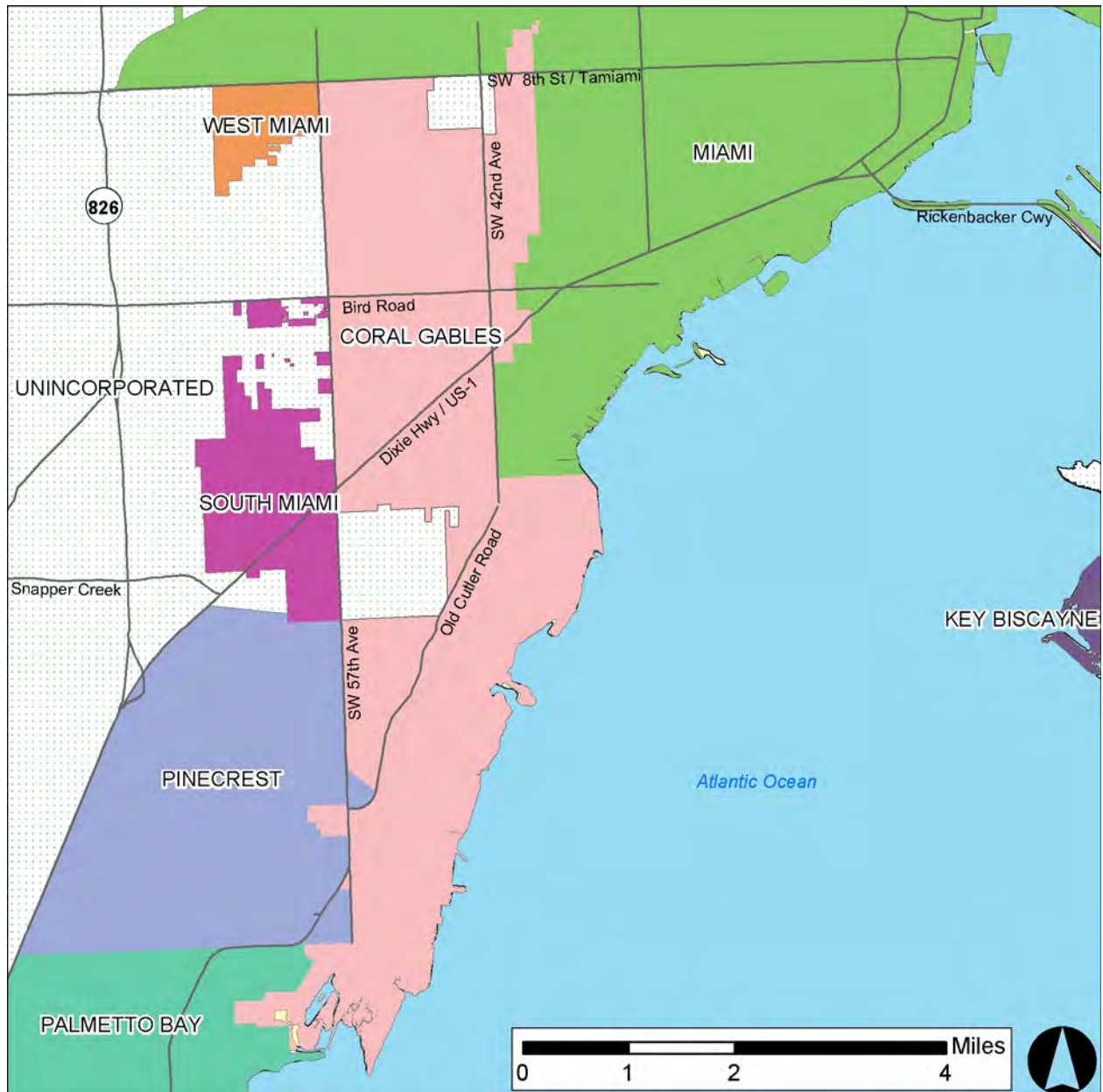
Proposed Future Land Use Map Changes				
Parcel	Acres	Original Land Use	Proposed Land Use	Existing Uses
1	0.69	Commercial, Low and Mid-Rise Intensities	Public Buildings and Grounds	Coral Gables Museum
2	0.06	No Designation	Open Space	A triangular open grass lot
3	0.20	Residential Use (Single-Family) Low Density	Public Buildings and Grounds	A water pump

Staff analysis confirms that the proposed map amendments are compatible with and supportive of the Goals and Policies of the *Strategic Regional Policy Plan for South Florida*.

Recommendation

Find City of Coral Gables proposed amendment package #09-1ER generally consistent with the *Strategic Regional Policy Plan for South Florida*. Approve this staff report for transmittal to the Florida Department of Community Affairs.

Attachment 1



COMPREHENSIVE PLAN AMENDMENTS

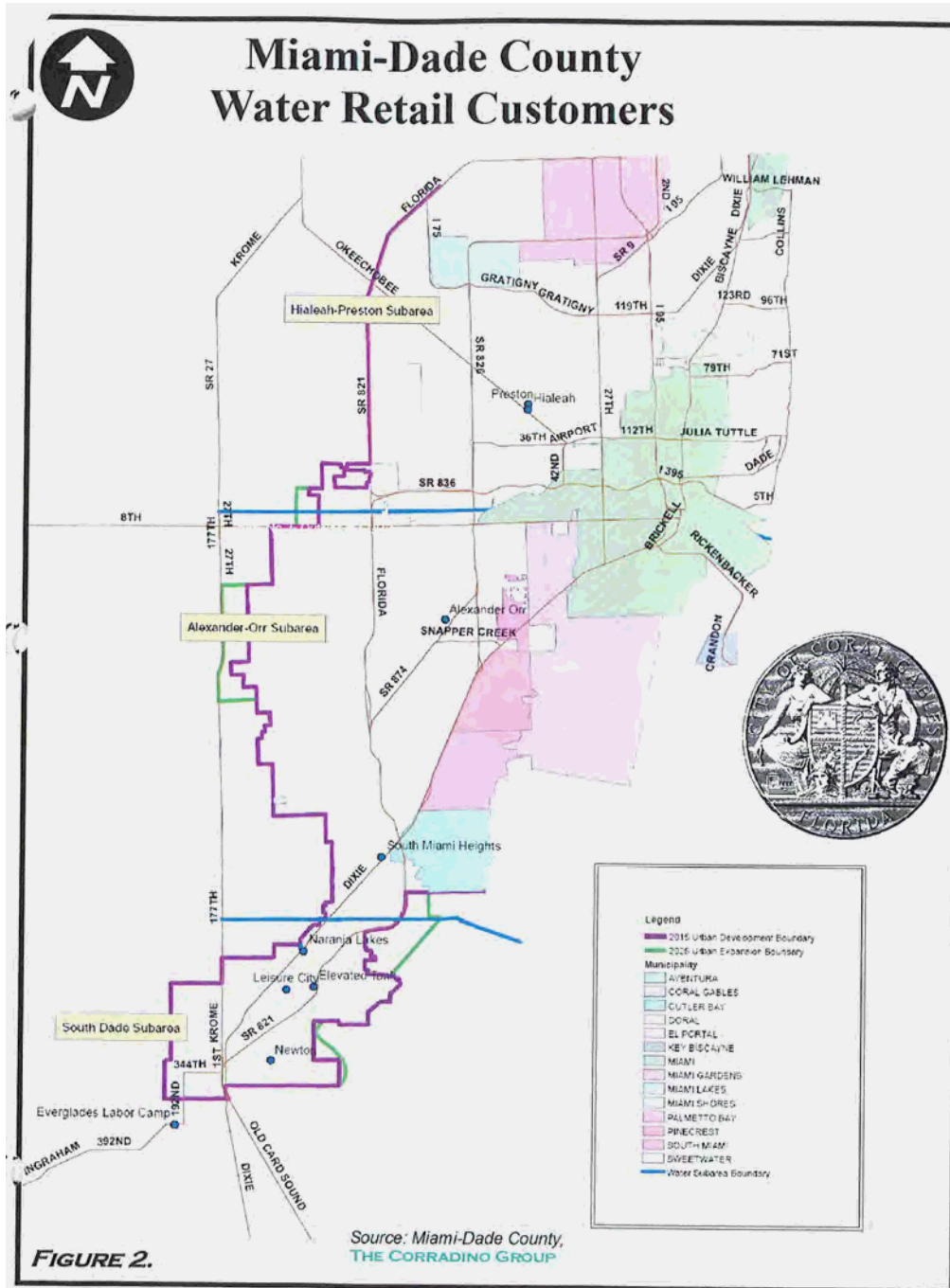
Location Map

City of Coral Gables
Proposed Amendment #09-1ER

Sources: FDEP, SFWMD, Miami-Dade County, SFRPC.

Note: For planning purposes only. All distances are approximate.

Attachment 2



COMPREHENSIVE PLAN AMENDMENTS

Water Service Area

City of Coral Gables
Proposed Amendment #09-1ER

Sources: City of Coral Gables 10-Year Water Supply Facilities Work Plan, April 2009
Note: For planning purposes only. All distances are approximate.

Attachment 3



COMPREHENSIVE PLAN AMENDMENTS

Future Land Use Map Changes

City of Coral Gables
Proposed Amendment #09-1ER

Sources: City of Coral Gables, SFRPC.

Note: For planning purposes only. All distances are approximate.



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, appearing to read "Terrie Bates", with a long horizontal flourish extending to the right.

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



Carlos Alvarez, Mayor

CITY OF CORAL GABLES

2009 SEP 24 AM 8:51

Planning and Zoning
111 NW 1st Street • Suite 1210
Miami, Florida 33128-1902
T 305-375-2800

miamidade.gov

September 15, 2009

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

RE: City of Coral Gables Proposed EAR-Based Comprehensive Plan Amendments

Dear Mr. Eubanks:

The Department of Planning and Zoning (DP&Z) has reviewed the referenced City of Coral Gables EAR-Based Comprehensive Plan amendments. Our review is conducted to identify points of consistency or inconsistency with provisions of Miami-Dade County's Comprehensive Development Master Plan (CDMP). The Department finds that the proposed amendments related to the Evaluation and Appraisal Report (EAR) are generally consistent with the CDMP and offers comments on those elements where inconsistencies with the CDMP exist.

Future Land Use Element

1. Policy FLU-1.1.5, Page 3 of Future Land Use Element (FLUE): All of the various Commercial and Industrial categories have FARs listed with the exception of the Mixed Use Districts, which have only percentages of FAR that individual uses must meet. Without knowing the minimum and maximum FARs for this category, the impact of the percentages is difficult to assess. It is stated that the FAR ranges is located in the Zoning Code for these Mixed Use Districts; however, since the FARs for most categories listed in this Element, it would be consistent, and user friendly, to also list the FARs for the Mixed Use category.
2. The Downtown Overlay District shown on the Future Land Use Map (FLUM) is not referenced in the text of the FLUE. Such map categories should be addressed in this Element if on the FLUM legend.

Community Facilities Element

1. Policy COM-5.2.4, page 6: Please revise this policy as follows: "Additional coordination efforts will occur between WASD and the City through the water allocation system, ~~which is a monthly spreadsheet used.~~ Monthly building permit data will be provided to WASD to track development activity within the City. The City will monitor proposed amendments to the Miami-Dade County Comprehensive Development Master Plan as they relate to water supply planning and provide input as necessary.

Mobility Element

1. Policy MOB-2.1.1, page 2: This Policy provides for 20% of non-State roads within the City's designated Special Transportation Areas (STA) to operate below Level of Service (LOS) E. This 20% of non-State roads could include County roads and the Policy does not indicate a minimum LOS standard at which these roads should operate. This Policy should be revised to ensure that the City applies, to County roads within the STA, LOS standards that are consistent with the County's adopted LOS standards for those roads. Otherwise, County roads should also be excluded from this 20% provision.
2. Policy MOB-2.4.2, page 6: This Policy should be revised to replace the reference to "traffic circulation element" with "Mobility Element".

Natural Resources Element

1. Policy NAT-1.2.9, page 2: Revise this Policy to indicate that the City will enforce water use efficiency techniques for indoor water use in accordance with Section 8-31, 32-84 and 8A-381 of the Code of Miami-Dade County.
2. Policy NAT-1.2.12, page 2: Please revise this Policy to include language indicating the City will enforce the landscape standards in sections 18-A and 18-B of Miami-Dade County Code.

Capital Improvements Element

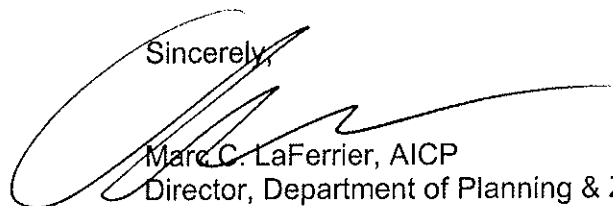
1. Policy CIE-5.1.2, page 7: Please revise this Policy as follows: "Furthermore, the City of Coral Gables will be responsible for providing monthly building permit data to WASD to be used for monitoring the availability of water supplies for all water users of the Miami-Dade County Water and Sewer Department, and for implementing a system that links water supplies to the permitting of new development."

General Comment

1. Throughout the revised Comprehensive Plan, there are still references to Metro-Dade County, or Dade County. Please revise those references to read Miami-Dade County.

County staff is available to work with the City to address the concerns stated above and to refine these proposed amendments before the City considers adoption of the amendments. If you have any questions, please contact Mark R. Woerner, Chief, Metropolitan Planning, at 305-375-2835.

Sincerely,



Marc C. LaFerrier, AICP
Director, Department of Planning & Zoning

ec: Eric Riel, Jr., Planning Director, City of Coral Gables

MCLF:SB: PHC:SAF