



STATE OF FLORIDA

DEPARTMENT OF COMMUNITY AFFAIRS

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CHARLIE CRIST
Governor

THOMAS G. PELHAM
Secretary

February 19, 2010

The Honorable Marie Young
Chairwoman, Escambia County
Board of County Commissioners
1190 West Leonard Street
Pensacola, Florida 32501

Dear Chairwoman Young:

The Department of Community Affairs has completed its review of the proposed Comprehensive Plan Amendment for Escambia County DCA Number 10-1ER, which was received on December 21, 2009. Based on Chapter 163, Florida Statutes, we have prepared the attached report, which outlines the Department's findings concerning the amendment. It is particularly important that the County address the 'objections' set forth in our review report so that these issues can be successfully resolved prior to adoption. We have also included a copy of local, regional, and state agency comments for your consideration. Within the next 120 days, the County should act by choosing to adopt, adopt with changes, or not adopt the proposed amendment package. For your assistance, our report outlines procedures for final adoption and transmittal.

The amendment package consists of a complete repeal and replacement of the Escambia County Comprehensive Plan and a new Future Land Use Map with new Future Land Use Categories reflecting the changes recommended in the Evaluation and Appraisal Report. Additionally, the proposed amendment package includes the Conceptual Long-Term Buildout Overlay for the Escambia County Optional Sector Plan. The Department is supportive of the County's efforts but has identified issues that require additional attention prior to adoption. Many of the objections and comments as outlined in this report are technical in nature and corrections are easily made. However, some will require additional data and analysis and detailed revisions and additions to plan objectives and policies.

The Conceptual Long-Term Buildout Overlay must reflect an orderly and compact pattern of development that protects valuable natural resources while efficiently utilizing existing and future public facilities. While it is clear these are Escambia County's goals as well, the planning and policies in the amendment need strengthening to better reflect and assure this result. The attached report identifies issues and makes recommendations for your consideration. The Department will continue to work with County staff to identify potential solutions.

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For your assistance, we have attached procedures for final adoption and transmittal of the comprehensive plan amendment. If you have any questions, please contact Susan Poplin, AICP, Regional Planning Administrator, or Emily Howard, Planning Analyst, at (850) 922-1811 or via e-mail at emily.howard@dca.state.fl.us.

Sincerely,

Mike McDaniel, Chief
Office of Comprehensive Planning

MM/eh

Enclosure: Objections, Recommendations and Comments Report
Review Agency Comments

cc: Ms. Terry Joseph, Executive Director, West Florida Regional Planning Council
Ms. Eva Peterson, Community Development Director, Escambia County

DEPARTMENT OF COMMUNITY AFFAIRS
OBJECTIONS, RECOMMENDATIONS AND COMMENTS REPORT
ESCAMBIA COUNTY
COMPREHENSIVE PLAN AMENDMENT 10-1ER

February 19, 2010
Division of Community Planning
Office of Comprehensive Planning

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

INTRODUCTION

The following objections, recommendations and comments are based upon the Department's review of Escambia County's proposed amendment to their comprehensive plan (DCA number 10-1ER) pursuant to Chapter 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 objections may have initially been raised by one 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 local government and corrected when the amendment is resubmitted for our compliance review. Objections, which 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, which follow the objections and recommendations section, are advisory in nature. Comments will not form bases of 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 to the back of the Department's 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, Escambia County has 120 days in which to adopt, adopt with changes, or determine that the County 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 County 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 County 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 West 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.

**OBJECTIONS, RECOMMENDATIONS AND COMMENTS REPORT
FOR ESCAMBIA COUNTY**

PROPOSED COMPREHENSIVE PLAN AMENDMENT 10-1ER

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

The Department has completed its review of the proposed amendment to Escambia County's Comprehensive Plan (DCA No. 10-1ER). The proposed Amendment contains a complete repeal and replacement of the Escambia County Comprehensive Plan, a New Future Land Use Map, and an Optional Sector Plan Conceptual Buildout Overlay pursuant to the optional sector planning requirements of Section 163.3245, Florida Statutes (F.S.).

The Department has identified the following objections, recommendations, and comments to the proposed amendments:

A. Map Amendments

- 1. Objection, Future Land Use Map:** The EAR-Based amendments propose an entirely new Future Land Use Map with a planning horizon of 2030. The proposed revisions to the Future Land Use Map are designed to consolidate 35 future land use categories on the adopted 2020 Future Land Use Map into 10 on the proposed 2030 Future Land Use Map. The amendment indicates the potential maximum residential build-out on vacant land on the current 2020 Future Land Use Map is greater than that under the proposed 2030 Future Land Use Map. The County asserts the 2030 Future Land Use Map actually represents approximately a 2 percent reduction in dwelling units based on permitted FLU densities. However, the data provided does not demonstrate the type and magnitude of changes made. Staff has identified potential objections with the depiction of proposed Land Use Categories:
 - (a) The Barrier Island Future Land Use Categories listed on the proposed Future Land Use Map are not consistent with those listed in the Goals, Objectives, and Policies of the Future Land Use Element. It appears the old categories from the 2020 Future Land Use Map still are illustrated. Proposed FLU policy 1.3.1 outlines different FLU categories for the barrier islands. Therefore, the FLUM does not adequately define the allowed uses consistent with Section 163.3177(6)(a), F.S.
 - (b) On the proposed 2030 Future Land Use Map the Conservation and Recreation categories are independent of one another. In proposed policy FLU 1.3.1 the two proposed Future Land Use Categories are listed as one with one description. The description of the REC/CON category states the designation will be used to promote the conservation of important natural resources and to provide recreational opportunities for citizens and visitors. The REC/CON designation does not describe the types of lands that could be designated or include a list of allowed uses. To allow recreational activities with no criteria or standards does not provide sufficient assurance environmental resources will be protected. Therefore, the amendments to the Future Land Use Map are not supported with appropriate data and analysis, do not

adequately define allowed uses, and create internal inconsistencies between the Future Land Use Map and the Future Land Use Element Goals, Objectives, and Policies.

- (c) In the Data and Analysis section of the proposed package, Tables A1 and A2 are intended to illustrate the reduction in future dwelling units based on maximum Future Land Use densities. These tables do not sufficiently explain the changes made on the Future Land Use Map and the result of these changes on Public Facilities. For instance, there is no indication of the impact of land use categories on nonresidential uses and for residential the tables do not include an assessment of before and after category changes. The submittal does not include an assessment of need, identify impact on the allocation multiplier, and does not assess impacts on Public Facilities.

Authority: Sections 163.3177(6)(a), (c) and (d), (8), and (9), F.S.; Rules 9J-5.005(2), (5), (6), 9J-5.006(2)(c)1,(3)(b)1, (3)(c)1, 6, 7, and (4); 9J-.012(3)(b)1, and (c)1; 9J-5.013(2)(b)3 and 4 and (2)(c)3, 5, , 6, 7, 8, and (3)(a) and (b)., F.A.C.

Recommendation: The County should revise the proposed plan amendment as outlined below:

- (a) The County should revise the proposed Future Land Use Map to show the newly established categories as proposed in policy FLU 1.3.1. Specifically the County should include the new categories for the barrier islands.
- (b) The County should establish separate Recreation and Conservation land use designations, with the latter including a description of the types of environmentally sensitive areas that could be so designated, and depict those areas as Conservation on the 2030 Future Land Use Map.
- (c) Finally, the County should revise Tables A1 and A2 to more accurately reflect the changes to the Future Land Use Map in regard to maximum densities and intensities. The tables should compare previous uses to proposed uses and identify the net changes in densities and intensities for each category. The allocation in relation to population should be used to identify a multiplier and impacts on land use need. The County should also revise public facilities impact data and analysis based on the newly proposed density and intensity standards for both the short term planning period and the long term planning period (2015 and 2030). The submittal should be revised to include tables that clearly depict the changes to land use allocation as a result of the proposed EAR update.

B. Text Amendments

- 2. **Objection, Energy Efficiency:** While the proposed EAR-Based amendments re-write each of the following Elements: Future Land Use, Transportation, Conservation and Housing, the proposed policies are not based on supporting data and analysis, do not result in energy-efficient land use patterns, and do not establish meaningful and predictable guidelines and standards addressing the following:

- (a) Future Land Use Element policies addressing greenhouse gas reduction strategies pursuant to Section 163.3177(6)(a), F.S. The County is extremely over allocated for residential need, the pattern for rural lands designated rural community (7 dwelling units per acre) have sprawl like characteristics and are not served well by public facilities.
- (b) Transportation Element policies addressing transportation strategies to address reduction in greenhouse gas emissions from the transportation sector pursuant to Section 163.3177(6)(b and j), F.S. The proposed Mobility Element does not include Goals, Objectives, or Policies which establish transportation strategies to achieve reductions in greenhouse gas emissions from the transportation sector.
- (c) Housing Element policies addressing principles to be followed in: (a) energy efficiency in the design and construction of new housing; and (b) use of renewable energy sources; pursuant to Section 163.3177(6)(f), F.S. The proposed Housing Element does not include Goals, Objectives or Policies which establish energy efficiency in construction of new housing or use of renewable energy sources.
- (d) Conservation Element policies addressing energy conservation and map of energy conservation areas pursuant to Section 163.3177(6)(d), F.S. The proposed Conservation Element does not include Goals, Objectives or Policies which address energy conservation and does not include a map of energy conservation areas.

Authority: Sections 163.3177(6)(a), (d), (f)(1)h, and (j)10, (8), and (10)e, F.S.; and Rules 9J-5.003(82) and (90); 9J-5.005(6); 9J-5.006(3)(b)9, (4), and (5)(i)(7); and 9J-5.019(4)(b), F.A.C.

Recommendation: The County should revise the Comprehensive Plan to include objectives and policies that provide meaningful and predictable standards and a measureable outcome that will result in compact, mixed use communities that contain a variety of housing types and prices, a variety of employment and shopping opportunities, and require a multi-modal transportation system that will result in reduced greenhouse gas emissions. The objectives and policies should be supported by and consistent with relevant and appropriate data and analysis.

- (a) Revise the Future Land Use Element to include objectives and specific policies with strategies to guide energy efficient land use patterns accounting for existing and future electric power generation and transmission systems and that reduce greenhouse gas emissions. The County should consider policies that will improve the pattern in the southern portion of the County to direct uses to urban areas with facilities such as Pensacola. For the rural settlements, the County should consider policies that require services, encourage compactness, and ensure a minimum mix of uses to reduce vehicle miles traveled and provide clear distinctions between agricultural areas and settlement areas.
- (b) Revise the objectives and policies of the Transportation Element to include strategies, programs, activities, and projects to address the reduction of greenhouse gas emissions from the transportation sector including these that reduce vehicle miles traveled.

- (c) Revise the Housing Element to include energy resources in the construction of new homes as well as during redevelopment activities.
- (d) Revise the Conservation Element to include objectives and policies with strategies that may include preservation of green space, natural resources, reduction of impervious surface (contributing to heat islands and stormwater runoff), clustering of development and use of appropriate densities to conserve open space and maximize use of developable lands to address energy conservation. The amendment should also be revised to include an energy conservation map.

For additional information, visit the Department's webpage at www.dca.state.fl.us/fdcp/Legislation/2008/HB697Resources.cfm.

- 3. **Objection, Public School Facilities Concurrency:** Proposed policies CMS 1.1.3 and 1.3.2 are inconsistent with the Public School Facilities Element. Proposed policy CMS 1.1.3 does not include the requirement for the County to report information and data regarding public school facility design capacity, existing level of service standards and any programmed capacity improvements for public school facilities. Additionally, proposed policy CMS 1.3.2 does not include concurrency standards for public school facilities that are consistent with Sections 163.3164(32) and 163.3180(13), F.S.

Authority: Sections 1163.3177(2), (6)(a); and 163.3180(13), F.S., and Rule 9J-5.005(5); 9J-5.025(3)(b)1, 2, 3 and (3)(c)7 and 8, F.A.C.

Recommendation: The County should revise proposed policies CMS 1.1.3 and 1.3.2 for consistency with the Public School Facilities Element ensuring LOS standards and concurrency provisions are consistent.

- 4. **Objection, Existing Land Use Data:** The County did not include a complete Existing Land Use Map or map series to support the Future Land Use Element Goals, Objectives, and Policies of the comprehensive plan. The County should include an Existing Land Use Map or map series for 2010 showing all existing land uses and natural resources within the County.

Authority: Sections 163.3177(1), (6)(a) and (d), and (8), F.S.; and Rule 9J-5.006(1), F.A.C.

Recommendation: The map or map series should include the following: existing land use designations; public buildings and grounds; other public facilities; vacant or undeveloped land; historic resources; existing and planned public potable waterwells and wellhead protection areas; beaches and shores including estuarine systems; rivers, lakes, bays, floodplains and harbors; wetlands; minerals and soils; indicate the generalized uses of land adjacent to its boundaries; and any existing dredge spoil sites as outlined in Rule 9J-5.006(1), F.A.C.

- 5. **Objection, Future Land Use Categories:** Proposed FLU Policy 1.3.1 includes the ten new Future Land Use Categories with descriptions: Mixed-Use Urban (MU-U), Mixed-Use Suburban (MU-S), Rural Community (RC), Agriculture (AG), Mixed-Use Perdido Key (MU-PK), Mixed-Use Pensacola Beach (MU-PB), Commercial (C), Industrial (I), Recreation & Conservation (REC/CON) and Public (P). With the exception of MU-PB and MU-PK, the proposed policy provides no standards for open space or ranges for allowable combinations of residential, commercial and industrial uses for the mixed use categories. Additionally, the policy is not

supported by data and analysis to demonstrate the proposed land use categories create fewer impacts to public facilities. These proposed land use categories do not provide predictability for assessing potential environmental impacts or for projecting public facility demands. Therefore, the mixed use categories do not include the required standards and make land use potential unpredictable.

Authority: Section 163.3177(6)(a), (8), and (9), F.S.; Rules 9J-5.005(6); and 9J-5.006(3)(c)7., F.A.C.

Recommendation: Proposed policy 1.3.1 should include required percentages of distribution amounts and the mix of uses allowed, or other objective measurement, to ensure the new mixed use categories enable implementation of a predictable mix of uses. The proposed land use categories should also include provisions for open space. The data and analysis should be revised to assess impacts to public facilities given the revised land uses. If, as stated the land use results in fewer impacts, then no additional revisions will be needed. However, if the land use revisions result in additional impacts, the additional facility planning as part of the amendment may be required.

6. Objection, Deferral of Future Land Use Policies: Many policies throughout the Future Land Use Element defer providing standards and regulations to the Land Development Code (LDC). These policies include:

- FLU 1.1.4 Zoning Districts
- FLU 1.1.5 Transfer of Development Rights
- FLU 1.1.6 Density Clustering
- FLU 1.1.7 Subdivision Regulations
- FLU 1.1.8 Performance Oriented Controls
- FLU 1.1.9 Planned Unit Development
- FLU 1.1.10 Buffering
- FLU 1.1.11 Location Criteria
- FLU 1.1.13 Family Conveyance Exception
- FLU 1.2.2 LDC Provisions
- FLU 1.2.3 Density Clustering
- FLU 2.3.3 Conservation Subdivisions
- FLU 4.1.2 Military Compatibility
- FLU 4.1.6 Military Transfer of Development Rights

Authority: Sections 163.3177(6)(a) and (b), (8), (9)(f); 163.3177(8) and (10), F.S.; Rules 9J-5.003(90); 9J-5.005(2)(a) and (c); and (6), 9J-5.006(3)(c)3, and 7, and (4)(c), F.A.C.

Recommendation: The above policies should be revised to reflect those programs, activities and standards necessary to achieve objective and goals in the plan as required by 9J-5.003(90), F.A.C., and should be meaningful and predictable as required by 9J-5.005(6), F.A.C. The Rule describes Land Development Codes as the strategy for implementing the goals and policies of the comprehensive plan. A comprehensive plan without standards provides no framework upon which Land Development Code strategies can be formulated. The County should revise the

above proposed policies to define programs and activities necessary to achieve the goals, objectives and policies of the comprehensive plan.

7. **Objection, Planned Unit Development Density and Intensity Bonuses:** Proposed policy FLU 2.1.4 addresses nonresidential uses and residential uses in Planned Unit Developments. The proposed policy could allow additional density and intensity beyond that on the Future Land Use Map without going through the land use map amendment process. Further, the size of this new land use change will be provided by a formula in the Land Development Regulations and a Concurrency test. It is not clear what the provision is intended to achieve and therefore is not consistent with Section 163.3177(6)(a), F.S. Additionally, the policy is unpredictable and defers a Comprehensive Plan issue to the Land Development Regulations.

Authority: Sections 163.3161(3); 163.3177(2), (6)(a) and (9) F.S.; Rule 9J-5.005(2), (5), and (6); and 9J-5.006(4), F.A.C.

Recommendation: The County should revise proposed policy FLU 2.1.4 or include policies with the objective to specify the conditions that must be met in order to achieve density and intensity bonuses within the Planned Unit Development designation and also provide an explanation of how the Planned Unit Development designation is applied. The objectives and policies also need to specify the allowed magnitude of development including densities and intensities, rather than deferring these standards to the Land Development Regulations without establishing the basis in the comprehensive plan for the magnitude of change allowed.

8. **Objection, Farm Housing Density Standards:** Proposed policy FLU 3.1.7, Farm Housing indicates that this type of housing will be permitted without regard for maximum residential densities making the policy unpredictable. Section 163.3177(6)(a), F.S., requires the identification of land uses and their densities and intensities of development, the proposed policy does not comply with this requirement.

Authority: Section 163.3177(2), (6)(a) and (9), F.S.; Rule 9J-5.005(6); and 9J-5.006(4), F.A.C.

Recommendation: The County should revise the language to include those necessary criteria and standards so that the policy is meaningful and predictable as required by 9J-5.005(6), F.A.C. The County should revise the proposed policy to establish an upper cap or ceiling for residential densities. The policy should also direct Farm Housing to appropriate areas using locational criteria and based on the availability of public facilities.

9. **Objection, Transfer of Development Rights Program:** The County has proposed sending and receiving areas to implement a Transfer of Development Rights Program with proposed policies FLU 1.1.5 and 2.1.5. The proposed policy states;

Sending areas may include but are not limited to, environmentally sensitive lands, coastal areas, historically significant properties, rural and agricultural lands and properties adjacent to military installations. Receiving areas are limited to those areas that are not environmentally sensitive lands, coastal areas,

historically significant properties, rural and agricultural lands and properties adjacent to military installations.

However, no data and analysis has been provided for either of these areas, supporting the use and assignment of these designations. The listed criteria in proposed policy FLU 2.1.5 do not provide meaningful and predictable standards including the identification of or criteria to be used for specific sending and receiving areas. This general description of sending and receiving areas is too broad and vague. Based on this description it is not possible to know what might be sending and receiving areas. The proposed policy is also inconsistent with 163.3177(6)(a), F.S., in that each future land use category must be defined in terms of uses included, and must include standards to be followed in the control and distribution of population densities and building and structure intensities.

Authority: Sections 163.3177(6)(a) and (d); 163.3177(11)(f); Rules 9J-5.005(2); 9J-5.003(90); 9J-5.005(6); and 9J-5.006(3) and (4)(c)7, F.A.C.

Recommendation: The County should work with the Florida Department of Environmental Protection and the Florida Fish and Wildlife Conservation Commission to inventory and prioritize natural resources throughout the County, including home ranges and mitigation patterns of wildlife species. Based on this information, sending and receiving areas should be selected and identified, with the general sending areas being most environmentally sensitive. The County should provide a map identifying the sending and receiving areas or specific policies including identification of the areas. The County should require a habitat management plan be prepared for all identified sending areas. Receiving areas should be suitable areas appropriate for development based on provision of public facilities, infrastructure and environmental resources. Additionally, the proposed policy should identify transfer rates, maximum allowable densities in the receiving areas, the remaining allowable uses in sending areas after density and intensity is transferred, and include provisions for restrictive easement(s).

- 10. Objection, Land Use Need Methodology:** The Evaluation and Appraisal Report recommended objectives and policies in the Future Land Use Element to be revised or added as part of the EAR-based amendments. One of these objectives outlined by the County in the EAR was to develop an acceptable methodology for identifying land use need. This objective was not achieved within the proposed package. The methodology used in the data and analysis is unclear and confusing. While the County states there is a net reduction in maximum residential build out under the proposed future land use categories it is not clear how this outcome was derived; and the overall land use allocation including a multiplier is not identified. Therefore, the proposed Future Land Use Element and Future Land Use Map are not supported by land use data including need.

Authority: Section 163.3177(1), (6)(a), (8), (9), and (10)(e), F.S.; Rule 9J-5.003(82) and (90), 9J-5.005(2), (6), and (7), and 9J-5.006(2)(c) and (4), F.A.C.

Recommendation: The County should develop and provide a professionally acceptable and applied methodology for land use data and land use need to support the new Future Land Use Element and Future Land Use Map.

- 11. Objection, Existing Transportation Data and Analysis:** The Mobility Element and Future Transportation Map Series are not supported by data and analysis on existing transportation conditions. The County did not include an Existing Transportation Map. The map or map series must include the limited and controlled access facilities and significant parking facilities; the general location of the public transit system including public transit routes or service areas, public transit terminals or transfer stations, and public transit right-of-ways and exclusive public transit corridors; significant bicycle and pedestrian ways; the existing functional classification and maintenance responsibility for all roads; the number of through lanes for each roadway; the major public transit trip generators and attractors; and existing peak hour and peak direction levels of service standards.

Authority: Section 163.3177(6)(j), F.S.; and Rule 9J-5.019(2)(a) and (b), F.A.C.

Recommendation: The County should develop and provide an Existing Transportation Map based on best available data, and that depicts the required facilities as identified in 9J-5.019(2)(a) and (b), F.A.C.

- 12. Objection, Future Transportation Map:** The County did include a Future Transportation Map; however it does not include all the required aspects. The County has established 2030 as the long-term planning timeframe. The Future Transportation Map or map series must include the proposed location of the public transit system including public transit routes or service areas, public transit terminals or transfer stations, and public transit right-of-ways and exclusive public transit corridors; proposed significant bicycle and pedestrian ways; the maintenance responsibility for all roads; the projected number of through lanes for each roadway; and projected peak hour and peak direction levels of service standards.

Authority: Section 163.3177(5)(a), (6)(a), and (j), F.S.; and Rules 9J-5.005(1)(e) and (4); 9J-5.019(5), F.A.C.

Recommendation: The County should include a Future Transportation Map depiction of required transit facilities, levels of service standards, roadway facility types and include the planning time frame of 2030 on the map, the long term planning time frame established by the County.

- 13. Objection, Transportation Concurrency Exception Areas:** Proposed policy MOB 1.2.1 establishes two Transportation Concurrency Exception Areas as shown in the attached Exhibit F. The Transportation Concurrency Exception Areas were also reflected in the previous plans. However, within the data and analysis, the Transportation Concurrency Exception Areas have not been evaluated to ensure they continue to meet the Transportation Concurrency Exception Area requirements.

Authority: Section 163.3180(5), F.S., and Rules 9J-5.0055(6); and 9J-5.019(3)(f), and (5)(a)4, F.A.C.

Recommendation: The County should revise the Mobility Element to include data and analysis which evaluates the two Transportation Concurrency Exception Areas and provides a determination as to whether they continue to meet Transportation Concurrency Exception Area requirements. Based on the Transportation Concurrency Exception Area evaluations the County should revise as necessary, the Goals, Objectives and Policies of the Mobility Element.

- 14. Objection, Housing Data and Analysis:** The proposed data and analysis does not fulfill the requirements of 9J-5.010(1), F.A.C., in regard to collection of Housing Data and Analysis. The data and analysis does not evaluate the housing needs for moderate income, low income, and very-low income households, group homes, foster care facilities, and households with special housing needs for the planning time frames established in the comprehensive plan.

Authority: Sections 163.3177(2), (6)(a) and (f), (8), (9), and (10), F.S.; and Rules 9J-5.003(82) and (90); 9J-5.005(2), (5), and (6); 9J-5.010(1), (2), (3)(b)1, 3, 4, and 7, (3)(c)2, 5, 6, 7, 8, and 11, F.A.C.

Recommendation: Revise the Housing Element to include data and analysis evaluating the housing needed for moderate income, low income, and very-low income households, group homes, foster care facilities, and households with special housing needs for the 2015 and 2030 planning time periods. The data and analysis needs to address how well current housing needs of the County are being met, projected affordable housing surpluses and shortfalls for the County's planning time frames, and evaluate how shortfalls will be addressed. The County should utilize information prepared by the Shimberg Center when updating the data and analysis. Based on the data and analysis, revise the goals, objectives, and policies to include objectives, with specific, measurable, intermediate end results that make progress towards meeting a goal. The policies associated with the objectives must include the meaningful, predictable standards that will be implemented by the County to achieve the objectives. The objectives and policies must ensure the provision of adequate sites and distribution of housing types including mobile homes and manufactured housing, for moderate income, low income, and very-low income households. Provisions must also be made for group homes, foster care facilities, and households with special housing needs.

- 15. Objection, Potable Water:** The Evaluation and Appraisal Report identified numerous objectives and policies in the Infrastructure Element to be amended as part of the EAR-based amendments. One of these was to revise the potable water objectives and policies to include the construction of any water supply facilities that are identified in the element to support development for the ten-year planning period. A policy containing this objective was not included in the proposed element. Therefore, the Plan with regard to potable water infrastructure is not supported by the recommendations in the EAR. In the North West Florida Water Management District comment letter they also recommended the proposed amendment be revised in incorporate an analysis of current and projected water supply needs and sources for at least a ten-year period.

Authority: Section 163.3177(6)(a), (c); and 163.3191(10), F.S., Rule 9J-5.011(2)(b)2, 4, and (2)(c)2,d, (3), and (4), F.A.C.

Recommendation: The County should revise the proposed amendments to incorporate an analysis of current and projected water supply needs and sources for the ten-year planning period. Based on this analysis the objectives and policies of the proposed plan should be revised to incorporate those strategies and projects needed to ensure provision of adequate potable water.

- 16. Objection, Coastal Management Data and Analysis:** The Coastal Management Element includes no analysis and three maps; Coastal High Hazard Area, Hurricane Evacuation Routes, and Public Access. The submittal does not provide adequate data and analysis to satisfy the requirements of 9J-5.012 F.A.C., for coastal resources. The revised element provisions are not supported by data and analysis and therefore, do not adequately protect coastal resources.

Authority: Sections 163.3177(6)(a) and (g), (8), (9), (10); 163.3178, F.S.; and Rules 9J-5.005(2)(a), (b), (g); and 9J-5.012(2), F.A.C.

Recommendation: The County should revise the Coastal Management Element data and analysis as set forth in Rule 9J-5.012(2), F.A.C. The County should also provide as part of the map series the necessary natural resource maps related to coastal resources. These include; vegetative cover, wetlands, areas subject to coastal flooding, wildlife habitat (particularly for the perdido key beach mouse), areas designated for historic preservation within the coastal planning area, and public access facilities (all public access points to the beach or shoreline, parking facilities for beach or shoreline access, coastal roads and facilities providing scenic overlooks, marinas, boat ramps, public docks, and fishing piers). Additionally, all maps should include a date and source of information. The County should also inventory estuarine pollution conditions and actions needed to maintain estuaries, beach dune systems, public access facilities, and existing infrastructure in the coastal planning area. The County should then revise the goals, objectives and policies as necessary, to be consistent with and supported by the data and analysis.

- 17. Objection, Coastal High Hazard Area Definition:** Proposed policy COA 1.2.1 establishes and adopts the definition of Coastal High Hazard Area which includes provisions to, establish the definition as the area below the elevation of the Category 1 storm surge line as established by the most current SLOSH computerized storm surge model, or as subsequently defined by Florida Statutes. This language is not consistent with the definition in Section 163.3178, F.S. It is self-amending and should be revised to more reflect the statutory definition.

Authority: Sections 163.3177(6)(a), (g), (8), (9), (10); 163.3178(2)(h), (9)(c), F.S.; and Rules 9J-5.006(4)(b)6; 9J-5.012(2)(e)3, F.A.C.

Recommendation: The County should revise proposed policy COA 1.2.1 to consistent with Section 163.3178(2)(h), F.S., defining the Coastal High Hazard Area as “the area below the elevation of the category I storm surge line as established by a Sea, Lake, and Overland Surges from Hurricanes (SLOSH) computerized storm surge model.” The County should also revise the County’s Future Land Use Map series as necessary, to depict the Coastal High Hazard Areas ensuring it is based on the statutory definition.

18. Objection, Deferral of Coastal Management Element Policies: Many policies throughout the Coastal Management Element defer providing standards and regulations to the Land Development Code (LDC). A comprehensive plan without standards provides no framework upon which Land Development Code strategies can be formulated. These policies include:

- COA 1.1.2 Flood Hazard Maps
- COA 1.1.4 Beach and Dune System
- COA 1.1.5 Stormwater Management
- COA 1.1.6 Wastewater Management
- COA 1.2.5 Prohibited Uses
- COA 1.2.6 Mobile Home Development
- COA 2.1.3 Development Impact Limits
- COA 2.2.2 General Use Priorities
- COA 2.2.3 Water-Related Use Priorities
- COA 2.2.4 Marina Regulation

Authority: Sections 163.3177(6)(a) and (b), (8), (9)(f); 163.3177(8) and (10), F.S.; Rules 9J-5.003(90); 9J-5.005(2)(a) and (c), (5) and (6); 9J-5.006(3)(c)3, and 7, and (4)(c), F.A.C.

Recommendation: The above policies should be revised to reflect those programs and activities necessary to achieve objective and goals in the plan 9J-5.003(90), F.A.C., and should be meaningful and predictable as required by 9J-5.005(6), F.A.C. The Rule also describes Land Development Codes as the strategy for implementing the goals and policies of the comprehensive plan, and to the extent the County will continue to recognize the commitment to update local regulations, policies may be revised to state so.

19. Objection, Conservation Element Data and Analysis: The proposed Conservation Element includes no analysis and maps only depicting the following information; Wellheads, Wetlands, Special Flood Hazard Areas, and Hydric Soils. The Conservation Element does not provide adequate data and analysis to satisfy the requirements of Rule 9J-5.013(1), F.A.C. Therefore, the Goals, Objectives, and Policies are not supported.

Authority: Sections 163.3177(6)(a), (d), and (g), (8), (9), (10); 163.3178, F.S.; and Rules 9J-5.005(2)(a), (b), and (g); 9J-5.012(2); 9J-5.013(1),and F.A.C.

Recommendation: The data and analysis for the element should be revised to address the requirements as set forth in Rule 9J-5.013(1), F.A.C. The County should include identification and an inventory of all the natural resources, where present within the County’s boundaries listed in 9J-5.013(1), F.A.C . These include; rivers, lakes, bays, wetlands including estuarine marshes, groundwater and air, including information on quality of the resource available from and classified by the Florida Department of Environmental Regulation. Also including; floodplains, known sources of commercially valuable minerals, areas known by the local soil and water conservation district to have experienced soil erosion problems, areas of recreationally and commercially important fish or shellfish, wildlife, marine habitats, and vegetative communities including forests, indicating known dominant species present and species listed by federal, state, or local government agencies as endangered threatened or species of special

concern. The County should revise the goals, objectives and policies for natural resource protection, as necessary, to be consistent with and supported by the data and analysis.

- 20. Objection, Wellhead Protection Map:** Exhibit J, Wellhead Protection Map illustrated the well locations on a map of the County. However, it does not recognize the Wellhead Protection Zones as outlined in proposed policy INF 5.1.3. Which is required pursuant to Rule 9J-5.006(1)(b), F.A.C.

Authority: Sections 163.3177(6)(a) and (c), F.S.; and Rule 9J-5.006(1)(b), F.A.C.

Recommendation: The County should revise the proposed map to show Wellhead Protection Zones so the map does not create an internal inconsistency with proposed policy INF 5.1.3 and is also consistent with Rule 9J-5.006(1)(b), F.A.C.

- 21. Objection, Deferral of Conservation Policies:** Proposed Conservation policies 1.1.1 through 1.1.8 require the County to identify an inventory of the County’s environmentally sensitive lands and to protect marine and wildlife habitats in coordination with the state and federal agencies. While these proposed policies state the County will maintain an inventory, protect natural resources, and promote wetland functions, they do not include protection strategies, or protect natural resources from development impacts. Proposed Conservation policy 1.4.1 states the County will provide comprehensive wellhead protection, but does not indicate how this will be accomplished. Additionally, many policies throughout the Conservation Element defer providing standards and regulations to the Land Development Code (LDC). These policies include:

CON	1.3.8	Density Clustering
CON	1.5.1	Erosion Control
CON	1.6.2	Identification and Protection
CON	1.6.3	Tree Protection
CON	1.6.4	Urban Forest Management
CON	1.6.5	Impact Mitigation
CON	1.6.8	Invasive Species Management
CON	1.6.10	Professional Standards

Authority: Sections 163.3177(6)(a), (b) and (d), (8), (9)(f); 163.3177(8) and (10), F.S.; Rules 9J-5.003(90); 9J-5.005(2)(a) and (c), (5) and (6); 9J-5.006(3)(c)3, and 7, and (4)(c); 9J-5.0013(2) and (3), F.A.C.

Recommendation: The above policies should be revised to reflect those programs and activities necessary to achieve Conservation Element objectives and goals in the plan as required by 9J-5.003(90), F.A.C., and should be meaningful and predictable as required by 9J-5.005(6), F.A.C. In particular, the treatment of wetlands and habitat need to be defined and predictable including applicable preservation, buffering and any required management plans. The Rule also describes Land Development Codes as the strategy for implementing the goals and policies of the comprehensive plan, and to the extent the County will continue to recognize the commitment to update local regulations, policies may be revised to state so.

22. **Objection, Buffering:** Proposed policy CON 1.6.6 indicates the County will require buffering to minimize conflicts between adjoining land uses, however the policy does not provide guidance on the extent of buffering that might be minimally required. This does not provide meaningful and predictable standards as required by Rule 9J-5.005(6)

Authority: Sections 163.3177(6)(a); Rules 9J-5.003(90); 9J-5.005(2)(a) and (c), and (6); Rule 9J-5.006(3)(c)2, F.A.C.

Recommendation: The above policies should be revised to reflect those programs and activities necessary to achieve objective and goals for land use compatibility in the plan 9J-5.003(90), F.A.C. Policies for compatibility should be meaningful and predictable as required by 9J-5.005(6), F.A.C. The County should revise the above proposed policies to define programs and activities necessary to achieve the goals, objectives and policies of the comprehensive plan.

23. **Objection, Internal Inconsistencies:** Proposed policy ICE 1.1.1 requires adjacent affected local governments and the school board to make written requests for copies of plan amendments. This proposed policy is inconsistent with Section 7 of the approved Interlocal Agreement and Objective 1.5 of the Public School Facilities Element, both which require the County to give the school board notice of plan amendments and provide the opportunity to comment. Therefore, the amendment is internally inconsistent with the existing policies of the Plan.

Authority: Sections 163.3177(2), (6)(a), and (h)1 and 2, and (12)(g), and (9)(b), F.S.; and Rule 9J-5.005(5); 9J-5.025(3)(c)6, F.A.C.

Recommendation: The County should revise the policy for consistency with the agreement and internal consistency with the Public School Facilities Element.

24. **Objection, Internal Inconsistency** The listed levels of service standards in proposed policy CIE 1.1.2 are incorrect references to the LOS standard policies in each element throughout the proposed plan because they reference the version of the Comprehensive Plan that is proposed for repeal or deletion. Additionally, the policy does not reference Level of Service Standards for Public School Facilities.

Authority: Sections 163.3177(2), (3), (6)(a),(c), (h)1 and 2, and (j), (9)(b), F.S.; and Rule 9J-5.005(5); 9J-5.006(3)(b)1; 9J-5.011(2)(c)2; 9J-5.019(4)(c)1; 9J-5.025(3)(b)2; 9J-5.016(3)(c)4; and 9J-5.025(3)(c)7, F.A.C.

Recommendation: The County should revise proposed policy CIE 1.1.2 to reflect the correct references to levels of service standard policies in each element of the proposed Comprehensive Plan. The County should also include a reference to the adopted level of service standards for Public School Facilities.

25. **Objection, School District Facilities Work Plan:** The County has not revised proposed policy CIE 1.2.5 to adopt the new five-year district facilities work plan approved by the

Escambia County School Board in September 2009 that became effective October 1, 2009 and has not included best available data on school LOS standards.

Authority: Sections 163.3177(3), (6)(a) and (h)1; 163.3180(13), F.S. and Rules 9J-5.005(3), 9J-5.016(1)(a), (2)(c), (4); and 9J-5.025(3)(b)3 and (c)2, F.A.C.

Recommendation: The County should revise proposed policy CIE 1.2.5 to adopt the 2009-10 through 2013-14 district facilities work plan by reference (citing, author, title, and date) as was completed in the recent Capital Improvement Element update. Include the School Element data and analysis from the most recent Capital Improvement Element update, found in compliance by the Department in December 2009. Revise Capital Improvement Element as necessary to recognize and be consistent with school data. The School Element data and analysis needs to be updated to evaluate whether the adopted level of service standards for schools will be maintained in the five-year planning period and in the long-term planning horizon.

- 26. Objection, Best Available Data:** Maps 7 and 8 of Exhibit R no longer represent best available data related to future school facilities.

Authority: Sections 163.3177(3), (6)(a) and (h)1; 163.3180(13), F.S. and Rules 9J-5.005(3); 9J-5.016(1)(a), (2)(c), (4); and 9J-5.025(3)(b)3 and (c)2, F.A.C.

Recommendation: The County should update the maps in exhibit R to reflect the current five-year distinct facilities work plan, 2009-10 through 2013-14, and revise the maps for consistency with the current five-year district facilities work plan (for the period 2009-10 through 2013-14).

- 27. Objection, Florida Department of Transportation Work Program:** Exhibit A is shown as the Florida Department of Transportation Work Program 2009-2013. This is not the most recent adopted version. Therefore, the element is not supported by the most recent work plan.

Authority: Section 163.3177(2), (3)(a), (4)(a), (6)(a), (6)(j), (8) and (10); 163.3180(13)(d)(1), F.S.; Rules 9J-5.005(2)(g); 9J-5.006(3)(b)1 and (c)3; 9J-5.016(1)(a)(4)(b); 9J-5.019(2) and (3) F.A.C.

Recommendation: The County should include the most current FDOT Work Program 2010-2014 as it referenced in the annual Capital Improvements Element update. The update was found in compliance by the Department in December 2009.

- 28. Objection, Capital Improvement Program:** Exhibit Q is shown as the Capital Improvement Program FY 2009-2013 Schedule.

Authority: Section 163.3177(2), (3)(a), (4)(a), (6)(a), (8) and (10); 163.3180(13)(d)(1), F.S.; Rules 9J-5.005(2)(g); 9J-5.006(3)(b)1 and (c)3; 9J-5.016(1)(a)(4)(b), F.A.C.

Recommendation: The County should include the most current CIP FY 2010-2014 Schedule as it was adopted in the annual CIE update. The update was found in compliance by the Department in December 2009.

C. The Optional Sector Plan Conceptual Overlay Plan

29. **Objection, Suitability:** The Long Range Conceptual Land Use Map includes areas designated for Regional Employment District, Neighborhood Center, and Regional Town Center which are not suitable for these designations due to the extensive presence of floodplains, wetlands, and native upland habitat. Additionally, the proposed Overlay also illustrates a number of new roadways, most notably the main north-south controlled access roadway that would cross a number of branches of the streams and wetland systems in the area.

The southwestern area of the Sector Plan contains significant amounts of environmentally sensitive areas such as floodplains, wetlands, and drainage basin connections to the Perdido River. The Sector Plan Area is within the Perdido River and Bay watershed, a Surface Water Improvement and Management priority of the Northwest Florida Water Management District. The Perdido River is designated an Outstanding Florida Water under Chapter 62-302, F.A.C. Additionally, the Map identifies areas as Wetlands and Water Management District Land, but does not indicate that areas will be preserved as conservation or how it will be buffered from the proposed adjacent Regional Employment District, Town Center, and Neighborhood uses. The guidelines and policies in the Conceptual Overlay Plan propose to defer all environmental protection measures to the development of the Detailed Area Site Plans.

Furthermore, the Northwest Florida Water Management District commented that the Sector Plan Conceptual Overlay has located land uses of varying apparent intensities adjacent to Northwest Florida Water Management District lands. These lands have been publically acquired to protect water and related resources, to facilitate restoration and enhancement, and to provide for public access and enjoyment. Activities that may affect adjacent land uses may include hunting and periodic prescribed burning.

Authority: Sections 163.3177(6)(a) and (d); 163.3177(8); 163.3245(3)(a)1, F.S.; and Rules 9J-5.006(3)(b)1, and (4); 9J-5.013(1)(a), (b), and (2); 9J-5.013(3), F.A.C

Recommendation: The County should revise the proposed overlay amendment to ensure uses and anticipated facilities, including roadways, are suitable for areas in which they are proposed and to designate environmentally sensitive wetlands, upland habitat, and floodplain areas as conservation uses, to ensure the maintenance of water quality and quantity and the protection of native habitat. In addition, the areas subject to conservation should be placed in a conservation easement which prohibits development and allows only conservation and passive recreation uses. The conservation easement, ensuring the protection of the regionally significant natural resources in perpetuity, must be recorded in the public records at the time the Overlay is adopted. The conservation easement shall be prepared in conjunction with the Overlay comprehensive plan amendment and submitted to the Department for approval prior to the adoption of the amendment. The conservation easement shall include all conservation lands identified in the Overlay. After approval by the Department, the easement shall be placed with an escrow agent with the direction that the conservation easement shall be recorded in the public

records of the applicable local government and become effective at the time a Final Order is issued by the Department of Community Affairs approving the Conceptual Overlay Plan. The Conservation Easement shall be enforceable by the local government of jurisdiction and either the Department of Environmental Protection, the Northwest Florida Water Management District or other appropriate entity(ies) as identified in the easement documents. Detailed Specific Area Plans shall not include or overlap with areas designated as Conservation in the Overlay or included within the conservation easement.

30. Objection, Goals, Objectives, and Policies: Proposed policies FLU 5.2.1, 5.5.2, and 5.5.1 describe the general land uses shown on the Conceptual Long-Term Buildout Overlay. The Department has identified the following concerns with the Goals, Objectives, and Policies:

- (a) The Overlay does not identify the anticipated amount of residential and non residential uses at the anticipated overlay buildout. Therefore, the development has not adequately identified anticipated development areas consistent with Section 163.3245(3)(a)1, F.S. and 163.3245(3)(a)4.
- (b) All the land uses shown on the map are not addressed in the policies. For instance the uses allowed and the treatment of Wetlands, Water Management District Lands, and Public Land are not described. The Northwest Florida Water Management District commented the Sector Plan Conceptual Overlay has located land uses of varying apparent intensities adjacent to Northwest Florida Water Management District lands. Activities may affect adjacent land uses. Development plans and associated comprehensive plan standards and policies are not such that public uses and investments are protected and potential conflicts are avoided.
- (c) While proposed policy FLU 5.5.2 outlines a mixture of residential neighborhood types that vary in regard to dwelling unit and type the policy only states the application of these residential neighborhood types will be “generally consistent” with the Conceptual Overlay. This does not establish meaningful and predictable guidelines for the application of residential neighborhood types. Approximately 60-70% of the development will consist of Neighborhoods, which are subcategorized into Existing, Traditional/Urban, New Suburban, and Conservation. Within the Goals, Objectives and Policies of the Future Land Use Element and on the Conceptual Overlay Map there are not standards as to the amount of each sub-category which will be allowed in the Optional Sector Area.

Application of the neighborhood categories with no regard to the placement of the residential uses as outlined in proposed policy FLU 5.5.2 has the potential to promote urban sprawl. Although the policy calls for a demonstration of diversity and integration of uses, no guidelines are included to ensure development is clustered into compact forms with appropriate central services. The neighborhood areas also do not provide a maximum build out of residential densities within the prescribed areas on the Conceptual Long Term Overlay Buildout Map. Therefore, the proposed Optional Sector Overlay exhibits indicators of urban sprawl including: promotes, allows or designates for development substantial areas of the jurisdiction to develop as low-intensity, low-density, or single-use development or uses in excess of demonstrated need; as a result of premature or poorly

planned conversion of rural land to other uses, fails adequately to protect and conserve natural resources, such as wetlands, floodplains, native vegetation, environmentally sensitive areas, natural groundwater aquifer recharge areas, lakes, rivers, shorelines, beaches, bays, estuarine systems, and other significant natural systems; fails adequately to protect adjacent agricultural areas and activities, including silviculture, and including active agricultural and silvicultural activities as well as passive agricultural activities and dormant, unique and prime farmlands and soils; fails to maximize use of existing public facilities and services; fails to maximize use of future public facilities and services; allows for land use patterns or timing which disproportionately increase the cost in time, money and energy, of providing and maintaining facilities and services, including roads, potable water, sanitary sewer, stormwater management, law enforcement, education, health care, fire and emergency response, and general government; fails to provide a clear separation between rural and urban uses; discourages or inhibits infill development or the redevelopment of existing neighborhoods and communities; fails to encourage an attractive and functional mix of uses; results in poor accessibility among linked or related land uses; and results in the loss of significant amounts of functional open space.

Therefore, the amendment does not adequately regulate the use of land in a predictable manner, and because of the potential pattern does not discourage urban sprawl.

- (d) While proposed policies FLU 5.5.1 and 5.2.1 outline mixtures of non-residential and residential development that vary in regard to residential and intensity standards the policy only states the application of these residential commercial centers and regional employment districts will be “generally consistent” with the Conceptual Overlay. This does not establish meaningful and predictable guidelines for the application of residential commercial centers and regional employment districts. Within the Goals, Objectives and Policies of the Future Land Use Element and on the Conceptual Overlay Map there are no anticipated maximum buildout totals in terms of residential units and square feet for commercial facilities and residential densities which will be allowed in the Optional Sector Area.

Authority: Sections 163.3177(6)(a, c, and d); 163.3177(2, 3, and 8); and 163.3245(3)(a), F.S.; and Rules 9J-5.005(2, 5, and 6); 9J-5.006(3)(b)8 and (c), (4), and (5)(g), F.A.C.

Recommendation: The Goals, Objectives, and Policies should be revised as follows:

- (a) The Overlay should be amended to identify the anticipated maximum residential densities in residential units and should identify the maximum non-residential uses in terms of type of non residential (i.e. commercial, industrial, and public) using maximum square feet. The Plan should state these uses and require subsequent DSAPs to be consistent with and respective of the level of development.
- (b) The County should outline uses allowed and the treatment of Wetlands and Water Management District Lands. The County should also incorporate landscape buffers and consider the development of standards provided in the publication “Wildfire Mitigation in

Florida: Land Use Planning Strategies and Best Development Practices”’, available from the Florida Division of Emergency Management via their website at: [www.floridadisaster.org/BRM/Mitigation_Section .htm](http://www.floridadisaster.org/BRM/Mitigation_Section.htm) within the Goals, Objectives and Policies of the Future Land Use Element. As appropriate and supported by the data, areas should be assigned a Conservation use with appropriate easements as recommended in Objection 30.

- (c) The County should revise the plan to provide appropriate guidelines and standards for neighborhood development in the area as well as for the preparation of the more specific detailed area plans. The neighborhood types including location, size, and extent in proposed Policy FLU 5.5.2 should be on the overlay map. The policies should be revised to ensure appropriate densities, compactness, and linkage to non residential uses. The County should also demonstrate the Conceptual Overlay Long Term Buildout discourages the proliferation of urban sprawl consistent with the requirements of Rule 9J-5, F.A.C., and the Escambia County Comprehensive Plan by ensuring the residential component is not in excess of demonstrated need and is served by public facilities.
- (d) The County should revise the plan to provide appropriate guidelines and standards for future neighborhood development in the area as well as for the preparation of the more specific detailed area plans. The constraints listed for commercial types in proposed Policy FLU 5.5.1 should include maximum development totals for all non-residential and residential intensities and densities. Proposed policy FLU 5.2.1 should include maximum square footage and the policies should be revised to ensure appropriate densities, intensities, compactness, and linkage to non residential uses. The County should also demonstrate the Conceptual Overlay Long Term Build out discourages the proliferation of urban sprawl consistent with the requirements of Rule 9J-5, F.A.C., and the Escambia County Comprehensive Plan by ensuring the residential component is not in excess of demonstrated need and is served by public facilities.

An overview of the Optional Sector Plan Conceptual Long Term Buildout Overlay should include the overall maximum number of dwelling units and square feet of commercial, office, and industrial space anticipated based on the Conceptual Overlay Map. Also, accompanying policies should require subsequent DSAPs amendments to achieve to the development level and meet the guidelines in the Optional Sector Plan Conceptual Long Term Buildout Overlay.

- 31. Objection, Need:** The Conceptual Long Term Buildout Overlay for the Optional Sector Plan is not supported by a land use needs analysis based on the projected population and anticipated growth for the newly proposed short and long-term planning time frames (2015 and 2030). The proposed sector plan does not identify and analyze potential residential and non-residential development through the 2030 planning time frame. The analysis is not related to the available lands allocated on the FLUM and to the objectives associated with the Sector Plan, including those to encourage employment and activity centers and to further mixed use development.

In view of the amount of land allocated in more suitable urbanized areas of the County, the lack of meaningful and predictable standards to achieve urban form with a compact and balanced mix of uses, and the presence of indicators of urban sprawl, land use need has not been demonstrated to justify the proposed increase in development. In addition, the proposed

amendment does not contain sufficient goals, objectives, and policies to justify the increased development potential by promoting job creation, capital investment, and economic development.

Authority: Section 163.3177(1), (6)(a); 163.3177(2, 4, 8, and 10); and 163.3245(3), F.S.; Rules 9J-5.005(2 and 5); 9J-5.006(1), (2), (3)(c)1, (4), and (5)(h), F.A.C.

Recommendation: The amendment should be supported by a land use needs analysis demonstrating that the increases in residential and non-residential land uses allowed by the amendment are required to accommodate the County's projected population and anticipated growth (as projected in the data and analysis that supports the County's updated Comprehensive Plan) consistent with the planning timeframe of the County's Comprehensive Plan. In addition, the analysis should demonstrate that the amendment contains meaningful and predictable standards to achieve an appropriate urban form of development, job creation, capital investment, and economic development, and that the amendment discourages the proliferation of urban sprawl. The County should revise the amendments as necessary to be consistent with, and supported by the analysis.

- 32. Objection, Intergovernmental Coordination:** Section 163.3245(3)(a)5, F.S., requires the Optional Sector Plan Conceptual Long Term Buildout Overlay to identify general procedures to ensure intergovernmental coordination to address extra jurisdictional impacts from the long-range conceptual framework map. The proposed amendment does not establish meaningful and predictable procedures to adequately address the intergovernmental coordination requirements of Section 163.3245(3)(a)5, F.S.

Authority: Sections 163.3177(6)(a and h); and 163.3245(3)(a)5, F.S.; and Rules 9J-5.005(2); 9J-5.015(1,2, and 3), F.S.

Recommendation: The County should revise the Optional Sector Plan Conceptual Long Term Buildout Overlay to include meaningful and predictable procedures to adequately address the intergovernmental coordination requirements of Section 163.3245(3)(a)5, F.S.

- 33. Objection, Transportation Analysis:** Section 163.3245(3), F.S., requires the identification of regionally significant public facilities consistent with Chapter 9J-2, Florida Administrative Code, irrespective of local government jurisdiction necessary to support build-out of the anticipated future land uses. The Escambia County Conceptual Plan Overlay transportation facilities are not supported by data and analysis meant to or intended to identify regionally significant facilities needed to support build-out including maintaining the adopted level of service standards. The analysis also does not identify specific transportation improvements for road segments that will become deficient. The Conceptual Long-term Build-out Overlay Map shows a proposed Developer Parkway, Controlled Access Arterial, and other proposed roadways. Furthermore, the proposed Controlled Access Arterial is not listed on the proposed Future Roadway Network Map.

Authority: Sections 163.3177(6)(a and j); 163.3177(2,8,and 10); 163.3245(3)(a)2. F.S.; Rules 9J-5.005(2 and 5); and 9J-5.019(3), F.A.C.

Recommendation: The County should submit a transportation analysis to be based on the 2010 Florida Department of Transportation generalized Quality Level of Service Standards. Include a transportation analysis which identifies “needed” road improvements for those facilities which will fail within the anticipated build-out of the Conceptual Long-term Build-out Overlay. Include a list (or identification) of the needed road facilities specifying those that are regionally significant based on the transportation analysis and depict needed facilities on the Optional Sector Plan Conceptual Overlay Map and as applicable on the Future Transportation Map.

- 34. Objection, Public Facilities:** The Conceptual Long-term Buildout Overlay does not include data and analysis which estimates the potential impacts to public facilities including; potable water, sewer, public schools, stormwater, solid waste, and parks and recreation at the anticipated build-out. Section 163.3245(3)(a)(2). F.S., requires the Conceptual Long-term Build-out Overlay to identify regionally significant public facilities necessary to support build out of the anticipated future land uses. This analysis was not included in the proposed package. Furthermore, the County has not included sufficient data and analysis regarding potential impacts to public facilities or any identification of future needed facilities serving the Conceptual Long-term Buildout Overlay site.

Authority: Section 163.3177 (2), (3), (6)(a)(c), (8) and (12); 163.3245(3)(a)2, F.S.; and Rules 9J-5.005(2); 9J-5.006(3)(b)1 and (3)(c); 9J-5.011(2) and (3); 9J-5.016(2) and (3); and 9J-5.025(2)(c) and (d), F.A.C.

Recommendation: The County should complete data and analysis to identify regionally significant public facilities as related to public facilities necessary to support the build-out of the anticipated future land uses as identified on the Conceptual Long-term Build-out Overlay Map. The analysis should be based on the maximum anticipated build-out allowed under the Conceptual Long-term Build-out Overlay and analyzed over the 5-year planning time frame and the overall planning horizon. The Northwest Florida Water Management District recommends supporting analysis identify potable water facility needs and address water supply needs and sources over at least a ten-year period. The District also recommends protection of existing and future wells and recharge quality and quality be addressed because of the importance of the unconfined Sand and Gravel Aquifer.

- 35. Objection, Plant and Wildlife Species:** Section 163.3245(3)(a), F.S., requires the identification of regionally significant natural resources consistent with Chapter 9J-2, F. A. C. The Sector Plan Agreement (Agreement Authorizing an Optional Sector Plan in Escambia County) identifies regionally significant natural resources as a planning issue and opportunity to be addressed by the Sector Plan and states that the Sector Plan Process will identify regionally significant natural resources and minimize potential impacts from development to these resources. However, the proposed Conceptual Long-term Buildout Overlay is not supported by an identification of regionally significant natural resources including general information and anticipated strategies for their protection.

The Florida Fish and Wildlife Conservation Commission commented the Regional Employment District is surrounding the stream and wetland ecosystem of Jack’s Branch. The area is currently in the process of forest regeneration and may contain appropriate habitat for

gopher tortoises and other listed wildlife species. Also, the fishery community of the Jack's Branch stream system appears to be in good condition.

Authority: Section 163.3177(6)(a and d); and 163.3245(3)(a), F.S.; and Rules 9J-5.005(2,5, and 6); 9J-5.006(3)(b and c); 9J-5.013(2)(b and c), and (3); F.A.C.

Recommendation: The County should identify resources based on best available existing data and revise, as necessary, the Conceptual Long-term Buildout Overlay to establish meaningful and predictable guidelines to protect the regionally significant plant and wildlife species. Also, based on the data gathered the Optional Sector Plan and Conceptual Plan Overlay Map should be revised to designate Conservation where the regionally significant natural resources are shown. Any Conservation areas should be made subject to easements as recommended in Objection 30.

- 36. Objection, Wetland Protection:** Section 163.3245(3), F.S., requires the identification of regionally significant natural resources consistent with Chapter 9J-2, Florida Administrative Code. The Sector Plan Agreement (Agreement Authorizing an Optional Sector Plan in Escambia County) identifies regionally significant natural resources as a planning issue and opportunity to be addressed by the Sector Plan and states that the Sector Plan Process will identify and regionally significant natural resources and minimize potential impacts from development to these resources. The proposed amendment has not identified these regional resources and demonstrated that wetland resource impacts are minimized. Therefore the Conceptual Long-term Buildout Overlay is not consistent with the requirements of Section 163.3245(3)(a), F.S., and the Sector Plan Agreement to protect natural resources.

Authority: Sections 163.3177(6)(a and d); 163.3177(2, 8, and 10); and 163.3245(3)(a), F.S.; and Rules 9J-2; 9J-5.005(2,5, and 6); 9J-5.013(3),F.A.C.

Recommendation: The County should revise the Conceptual Long-term Buildout Overlay to establish meaningful and predictable guidelines defining wetlands that are required to be designated with the Conceptual Long-term Build-out Overlay. The Regional Town Center appears in the overlay to bracket and encompass significant wetlands and tributary streams. Efforts should be taken to concentrate intensive uses away from sensitive resources and habitats.

The County should designate wetlands, streams, rivers, lakes, springs and other karst features such as steepheads, and their associated upland buffers, and habitat for listed species as Conservation on the Future Land Use Map ensuring appropriate treatment and buffers. In these areas only conservation and passive recreational uses should be permitted. As directed in Objection 30, Conservation Easements shall be required for Conservation areas.

- 37. Objection, Housing:** The Sector Plan Agreement (“Agreement Authorizing an Optional Sector Plan in Escambia County”) identifies housing as a planning issue and opportunity to be addressed by the Sector Plan. For example, the Sector Plan Agreement states the following: “Providing for affordable housing through an analysis that demonstrates the need for the proposed amount of residential development including the affordability mix. Analyze the jobs-housing-mobility balance. Address the effects on existing neighborhoods by the proposed

development pattern and changes to the roadway network. Identify the effect to infill opportunities Countywide with this amount of development away from the existing urban areas.” The Conceptual Overlay does not include an analysis that identifies the housing requirements of the Sector Plan and describes how the Sector Plan will address the housing requirements consistent with the Sector Plan Agreement. Goals, objective, and Policies do not establish meaningful and predictable guidelines to ensure that the Sector Plan addresses all of the specific aspect of housing identified in the Sector Plan Agreement. Therefore, the Conceptual Plan Overlay is not consistent with the Sector Plan Agreement and Section 163.3245(3)(a)4, F.S.

Authority: Sections 163.3177(6)(a and f); 163.3177(8 and 10); 163.3245(3)(a), F.S.; and Rules 9J-5.005(2,5, and 6); 9J-5.010(1 and 2), F.A.C.

Recommendation: The County should revise the Conceptual Overlay Plan to include data and analysis about housing in Escambia County and that describes how the Sector Plan will address the housing requirements of the Sector Plan Agreement. Based on the data and analysis, revise the Conceptual Plan Overlay to include housing guidelines (plan objectives and policies) that establish guidelines to ensure that the Sector Plan and Detail Specific Area Plans adequately address housing consistent with the Sector Plan Agreement.

38. Objection, Detailed Specific Area Plans: Detailed Specific Area Plans implement the Conceptual Long-term Buildout Overlay and authorize the issuance of development orders. Section 163.3245(3)(b), F.S., outlines what the Detailed Specific Area Plans must include. Proposed objectives FLU 5.6 and 5.7 are intended to address this requirement. The Department identifies concerns:

- (a) The County’s proposed policies do not require the Detailed Specific Area Plan’s area to be of adequate size. Section 163.3245(3)(b)(a)1, requires the area to at least encompass 1,000 acres.
- (b) The Detailed Specific Area Plan must include detailed identification and analysis of the distribution, extent, and location of future land uses. Plan policies do not require DSAPs to meet this requirement for land uses.
- (c) The Detailed Specific Area Plan data and analysis submitted to the Department for review must also include detailed identification of regionally significant public facilities, including public facilities outside the jurisdiction of the host local government, anticipated impact of the future land uses on those facilities, and required improvements consistent with chapter 9J-2, F.A.C. Including public facilities necessary for the short term, including developer contributions in a financially feasible five-year capital improvement schedule of the affected local government. Plan policies do not require DSAPs to meet this requirement for public facilities.
- (d) Also including a detailed analysis and identification of specific measures to assure the protection of regionally significant natural resources and other important

resources both within and outside the host jurisdiction, including those regionally significant resources identified in chapter 9J-2, F.A.C. Plan policies do not require DSAPs to meet this requirement for natural resources.

- (e) The Detailed Specific Area Plans must also include principles and guidelines that address the urban form and interrelationship of anticipated future land uses. Plan policies do not require DSAPs to meet this requirement for urban form
- (f) Identification of specific procedures to ensure intergovernmental coordination to address extra jurisdictional impacts of the DSAP. Plan policies do not include requirements in DSAPs to follow intergovernmental coordination procedure established by the overlay.
- (g) The Detailed Specific Area Plans should also be required to address land use need, Green House Gas Policies and energy efficiency. The plan policies do not require DSAPs to address green house gas and energy efficiency consistent with the overlay and other plan requirements.

Authority: Section 163.3245(3)(b)(a), F.S.

Recommendation: The County should revise the Goals, Objectives, and Policies within Objectives 5.6 and 5.7 to include requirements of the above standards regarding Detailed Specific Area Plans as provided in Section 163.3245(3)(b), F.S.

- 39. Objection, Effective Detailed Specific Area Plans:** FLU policies 5.6.1.v and 5.6.3 state that Detailed Specific Area Plans will not be effective until approved by the Escambia County Board of County Commissioners. Section 163.3245(5), F.S., states that a plan amendment adopting a Detailed Specific Area Plan must be submitted to the Department under the requirements of Section 163.3184 and 163.3189(2), F.S. The County should revise policies 5.6.1.v and 5.6.3 to state the Detailed Specific Area Plan designations will not be effective until a plan amendment has been received and found in compliance by the Department according to Section 163.3184 and 163.3189(2), F.S.

Authority: Section 163.3245(5), F.S.

Recommendation: Proposed policies 5.6.1.v and 5.6.3 should be revised to state until or unless a Detailed Specific Area Plan is found in compliance when submitted to the Department according to the provisions in 163.3184 and 163.3189(2), F.S., as a large scale amendment, the property in the Optional Sector Plan shall maintain the underlying future land use designation.

D. Comments

- 1. Comment:** It is the Department's understanding proposed Objective 2.3; Urban Infill Areas is designated under Section 163.2514(2), F.S., solely for the purpose of the County's Community Redevelopment Area Program. If the County wishes to designate areas as Urban Infill under Section 163.2517, F.S., then the County would need to demonstrate the areas meet the criteria therein and go through the appropriate designation.

2. **Comment:** Proposed policy FLU 1.1.12 would be improved with the inclusion of language to acknowledge the need for consistency with provisions of the approved Interlocal Agreement for school planning.
3. **Comment:** The County proposed objective ICE 1.4 and an associated policy to require an agreement with the Santa Rosa County School Board to address school planning and concurrency requirements. Section 163.3177(12), F.S., establishes a December 1, 2008, deadline for implementation of school concurrency. The County should reconsider its proposed 2012 deadline for entering the agreement and ensure its adoption as soon as possible.
4. **Comment:** Proposed policy MOB 1.1.14 would be improved if revised for consistency with Public School Facilities Element proposed policy PFE 1.1.1, in regard to school locations.
5. **Comment:** The North West Florida Water Management District commented, the County should revise proposed Policy INF 3.1.8(2) referencing Rule 62-25, F.A.C., to reflect Rule 62-346, F.A.C., for stormwater treatment.
6. **Comment:** The Department of Environmental Protection commented, Chapter 62-521, F.A.C., establishes a statewide wellhead protection program and includes criteria for delineating wellhead protection areas for new construction. The County should provide policies based on this rule to guide incompatible land uses away from wellheads and to protect groundwater sources of potable water from possible contamination.
7. **Comment:** The Florida Fish and Wildlife Conservation Commission commented the County should revise proposed Policy CON 1.1.8 so the term endangered is not misinterpreted to mean the County is placing requirements on only one subset of protected species. The language should be changed to be inclusive of the full range of state and federally listed species occurring within the County.
8. **Comment:** Proposed policies throughout the Recreation and Open Space Element defer providing standards and regulations to the Land Development Code (LDC). These policies include:

- REC 1.3.2 Open Space Requirement
- REC 1.3.8 Areas within Private Development

The above policies should be revised to reflect those programs and activities necessary to achieve objective and goals in the plan 9J-5.003(90), F.A.C., and should be meaningful and predictable as required by 9J-5.005(6), F.A.C. The Rule also describes Land Development Codes as the strategy for implementing the goals and policies of the comprehensive plan. A comprehensive plan without standards provides no framework upon which Land Development Code strategies can be formulated. The County should revise the above proposed policies to define programs and activities necessary to achieve the goals, objectives and policies of the comprehensive plan.

9. **Comment:** The County should correct several cross references to the public school facilities element in the ordinance. Page 40, line 11, page 46, line 31, and page 51, line 26 should be revised to reflect the public school facilities element is Chapter 16. The County may wish to revise page 123, line 8 to replace “Ways” with “Routes” to reflect the correct name of the state program.

10. **Comment:** The Perdido River is an Outstanding Florida Waterway; the County should develop a master Stormwater Plan for the treatment of stormwater to Outstanding Florida Water standards into the Optional Sector Plan Goals, Objectives, and Policies.
11. **Comment:** The County should include a policy ensuring the host local government will submit a monitoring report to the Department and Regional Planning Council on an annual basis after adoption of a Detailed Specific Area Plan. The annual monitoring report must provide summarized information on development orders issued development that has occurred, public facility improvements made, and public facility improvement anticipated over the upcoming five years.
12. **Comment:** The County should include a policy ensuring current development within the Optional Sector Area build to the underlying future land use densities and intensities occur in a pattern consistent with the Conceptual Overlay Map. So that current densities do not encourage urban sprawl. The County should also include policies which cluster agricultural densities within the Optional Sector Planning Area.

II. CONSISTENCY WITH CHAPTER 187 F.S. STATE COMPREHENSIVE PLAN

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

General

Objection 2, Energy Efficiency and Greenhouse Gas Reduction:

- Section 187.201(25), Plan Implementation Goal (a) and Policy (b)7;
- Section 187.201(11) Energy, Goal (a) Policies (b) 1,3,4, and 5;
- Section 187.201(15), Land Use, Goal (a), and Policy (b)1;
- Section 187.201(19), Transportation, Goal (a), and Policies (b)2 and 9, F.S.

Future Land Use Element

Objections 1, 4, 5, and 10; Land Use Categories and Maps

- Section 187.201(25), Plan Implementation, Goal (a) and Policy (b)7;
- Section 187.201(15), Land Use, Goal (a) and Policy (b)1, 5, and 6;
- Section 187.201(17) Public Facilities Goal (a) and Policy (b)1, F.S.

Objection 6, 7, 8, and 9; Meaningful and Predictable Standards for Plan Policies

- Section 187.201(25), Plan Implementation, Goal (a) and Policy (b)7;
- Section 187.201(15), Land Use, Goal (a) and Policy (b)1, 5, and 6;
- Section 187.201(17) Public Facilities Goal (a) and Policy (b)1, F.S.

Concurrency Management System Element

Objection 3, Public School Facilities Concurrency

Section 187.201(17), Public Facilities, Policies (b) 3, 5, 6, 7 and 9;
Section 187.201(25), Plan Implementation, Policies (b) 1, F.S.

Mobility Element

Objections 11, 12, and 13; Transportation Data and Maps

Section 187.201 (6), Public Safety Policies (b) 22 and 23;
Section 187.201(15), Land Use Policies (b) 1, 2, 3, and 6;
Section 187.201(17), Public Facilities, Policies (b) 3, 5, 6, 7 and 9;
Section 187.201(19), Transportation Policies (b) 3, 8, 9, 13, and 15;
Section 187.201(25), Plan Implementation, Policies (b) 1, F.S.

Housing Element

Objection 14; Housing Data and Analysis

Section 187.201(4), Housing, Policies (b) 3;
Section 187.201(25), Plan Implementation, Policies (b) 1, F.S.

Infrastructure Element

Objection 15; Potable Water Ten-Year Planning Period

Section 187.201(7), Water Resources, Policies (b) 2, 8, 10, and 12;
Section 187.201(17), Public Facilities, Policies (b) 3, 5, 6, 7 and 9;
Section 187.201 (6), Public Safety Policies (b) 22 and 23;
Section 187.201(25), Plan Implementation, Policies (b) 1 F.S.

Coastal Management Element

Objections 16, 17, and 18; Coastal Management Polices

Section 187.201(6), Public Safety, Goal (a) and Policy (b)7;
Section 187.201(8), Coastal and Marine Resources, Policies 1 through 10;
Section 187.201(9), Natural Systems and Recreational Lands, Policies (b) 1 through 4, 7, and 9
through 13;
Section 187.201(25), Plan Implementation, Policies (b) 1 F.S.

Conservation Element

Objections 19, 20, 21, and 22; Conservation Element Policies

Section 187.201(6), Public Safety, Goal (a) and Policy (b)7;
Section 187.201(7), Water Resources, Policies (b) 2, 8, 10, and 12;

Section 187.201(9), Natural Systems and Recreational Lands, Policies (b) 1 through 4, 7, and 9 through 13;
Section 187.201(25), Plan Implementation, Policies (b) 1 F.S.

Intergovernmental Coordination Element

Objections 23 and 24

Section 187.201(17), Public Facilities, Policies (b) 3, 5, 6, 7 and 9;
Section 187.201(17) Public Facilities Goal (a) and Policy (b)1;
Section 187.201(25), Plan Implementation, Policies (b) 1, F.S.

Capital Improvement Element

Objections 25 and 26

Section 187.201(17), Public Facilities, Policies (b) 3, 5, 6, 7 and 9;
Section 187.201(17) Public Facilities Goal (a) and Policy (b)1;
Section 187.201(25), Plan Implementation, Policies (b) 1, F.S.

Outdated Attached Documents and Maps

Objections 27 and 28

Section 187.201(17), Public Facilities, Policies (b) 3, 5, 6, 7 and 9;
Section 187.201(17) Public Facilities Goal (a) and Policy (b)1;
Section 187.201(25), Plan Implementation, Policies (b) 1, F.S.

Conceptual Overlay Plan and Map for the Optional Sector Plan

Objections 29-30

Section 187.201(6), Public Safety, Goal (a) and Policy (b)7;
Section 187.201(7), Water Resources, Policies (b) 2, 8, 10, and 12;
Section 187.201(9), Natural Systems and Recreational Lands, Policies (b) 1 through 4, 7, and 9 through 13;
Section 187.201(15), Land Use Policies (b) 1, 2, 3, and 6;
Section 187.201(17), Public Facilities, Policies (b) 3, 5, 6, 7 and 9;
Section 187.201(19), Transportation Policies (b) 3, 8, 9, 13, 15;
Section 187.201(25), Plan Implementation, Policies (b) 1, F.S.

Recommendation: Revise the amendment, as necessary, to be consistent with the above referenced goals objectives and polices of the State Comprehensive Plan. Specific recommendations can be found following the objections cited previously in this report.