

# HOWEY-IN-THE HILLS

## EVALUATION AND APPRAISAL REPORT

### INTRODUCTION

At least every seven years the Town is required to review its comprehensive plan and determine if any changes are required as a result of changed conditions or as a result of changes in State requirements. Since the last evaluation and appraisal was done in 2010, the Town is due to conduct a review in 2017. According to the schedule issued by the Department of Economic Opportunity, the Town is due to submit its determination on needed revisions by October 1, 2017. The Town established a schedule for review of individual elements over the first half of 2017 to allow the Planning Board to digest the comprehensive plan in manageable sections and discuss potential revisions. In support of this effort, the staff provided a summary report for each element discussing the current contents of the element, changes to conditions that have occurred since the last review, changes to requirements, and other relevant information.

This report presents the combined analysis done for each element of the comprehensive plan. The Planning Board has recommended this report to the Town Council as the guideline for considering amendments to the comprehensive plan. Any amendments recommended by the Planning Board will be submitted for Town Council following the review and acceptance of this report by the Florida Department of Economic Opportunity as meeting the Town's comprehensive planning obligations for 2017 regarding the evaluation and appraisal of the current comprehensive plan.

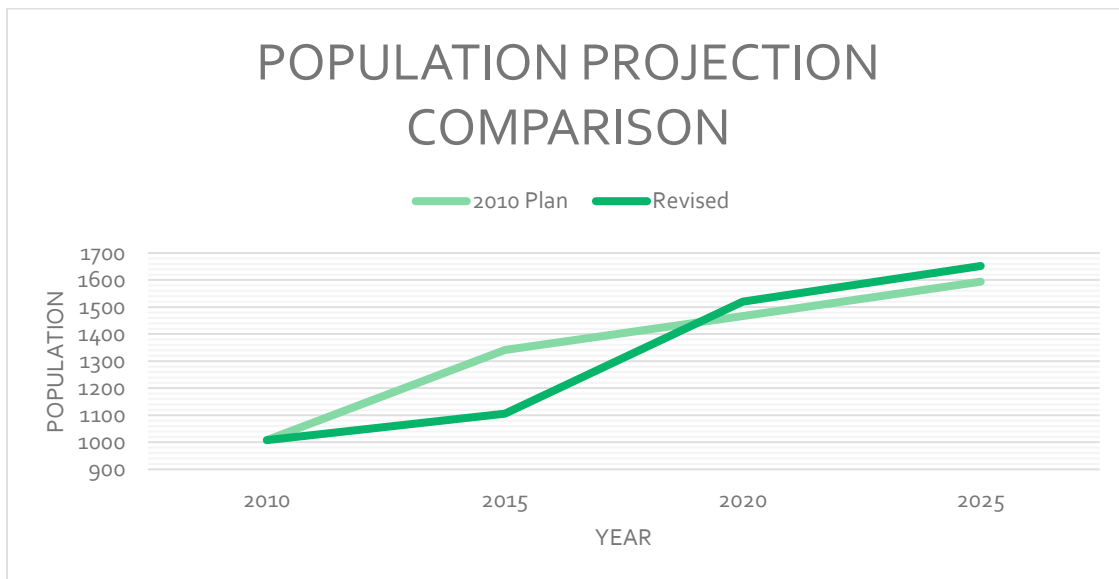
### FUTURE LAND USE ELEMENT

The Future Land Use Element sets forth the land use patterns anticipated for the Town looking forward to the end of the planning period. The future land use plan is a mixture of the built environment and the anticipation of what is desired on lands yet to be developed. The Town has opted for a program of large scale projects using a planned development process. These areas are identified as "Village Mixed Use" in the element. The balance of the plan focuses on the preservation and enhancement of the developed portions of the Town stressing compatible infill development. The land use pattern will serve as the key input to the structure and content of the elements of the comprehensive plan. The following sections will examine key change agents as they apply to the future land use element.

## LAND USE DATA AND ANALYSIS

### Population

The initial portion of the Future Land Use Element covers a range of data about existing conditions as they were in 2010; provides a projection of population growth through 2025; and an analysis of key factors to be considered in preparing the future land use element. For much of the period since the last evaluation and appraisal review, the nation, the state and the Town have experienced one of the country's most significant recessions and a slow, but steady recovery. The recession clearly impacted growth and development anticipated by the future land use element in 2010. This impact is reflected in delayed population growth. The following table and graph reflect the impacts on population.



YEAR	2010 PROJECTION	2017 REVISION	COMMENTS
2010	1008	1008	2010 Census Count
2015	1341	1106	2015 BEBR Estimate
2020	1467	1520	TMH Projection
2025	1594	1652	TMH Projection

The population graph clearly shows very little population growth for the 2010 to 2015 time period. The accelerated growth in population over the past year is based primarily upon the initiation of home building in the Venezia subdivision. The BEBR population estimate for 2016 is 1,260 indicating a continuation of this short-term growth. Unless another project comes forward to sustain the population growth through the end of the planning period, population increase will likely slow in the outer years. While the Town does have projects poised to move forward, these projects still have a two to three-year lead time for subdivision design and construction before lot sales and home building will occur. The revised projection anticipates that population will grow to a point slightly above the 2010 estimate, but the projected change is not dramatically different than the population levels anticipated by the current plan.

### **Existing Conditions**

In addition to population projections, the plan analyzes existing conditions for land use, public facilities and other data bases. Given the small change in population since 2010 there has been little change to the other factors addressed in the plan document with the exception of public facilities improvements. The findings relative to existing conditions are as follows:

- There has been no change in land development patterns. Development that has occurred has been largely infill development and more recently construction in the Venezia Subdivision. The Venezia project was approved prior to the 2010 review and was anticipated in the plan.
- The other Village Mixed Use projects including Mission Rise, The Reserve and the Avanti property (Lake Hills) remain in place but are still awaiting development activity.
- Residential density ranges and development intensities remain unchanged from 2010.
- With the start of the Venezia project, the Town has begun implementing its master sewer service agreement with the CDD. The Town has also obtained funding for the partial installation of sewers on Central Avenue.
- The Town has brought a new production well on-line and improved its potable water treatment and delivery system in line with the plan's recommendations.
- The Town has made improvements to the Sarah Maude Mason Preserve, Central Park and Griffin Park
- Soils and topography remain unchanged
- Natural resources remain unchanged
- Historic resources remain unchanged

The Town did experience a small growth in commercial development in the core area centered on Palm Avenue and Central Avenue. The Howey Market opened and tenants have

occupied most of the available commercial space. The Town completed a study of the Town Center Area and has moved to implement some of the study recommendations. The initiation of the sewer program on Central Avenue is the key recommendation from the study, but the Town has also made some adjustments to the land development regulations and comprehensive plan policies that are believed to support the proposed economic development program. The Town has also initiated design on a streetscape plan to be implemented concurrent with the sewer work.

## **ANALYSIS OF CHANGED LAND USE CONDITIONS**

Given the limited level of development which has occurred in the Town over the past seven years, much of the analysis done in 2010 is still valid today. The projected need for land to accommodate the anticipated population is basically the same as was projected in 2010. The Town has adhered to the basic tenets of the comprehensive plan as set forth in the most recent general update, and there is nothing to suggest a significant re-alignment of goals, objectives and policies is needed today.

Central Avenue Development and the Village Mixed Use projects were the key elements in growing the economic vitality of the Town. In the past seven years, the Town has continued to support the Village Mixed Use projects as the framework for new private sector development by supporting the implementation of the residential portion of the Venezia development and by restructuring the development agreement on the Avanti Property to more realistically accommodate market trends for mixed use projects going forward. These actions were done within the context of the current comprehensive plan's goal and objectives rather than creating a need to modify them.

As noted above, the Town has continued to develop its public utility services to properly support the Village Mixed Use projects and to support development along Central Avenue. The Town has used the period of lower development pressure to prepare these utility systems and to make some minor adjustments to policies and land development regulations within the Town Center commercial area. These policy and regulatory adjustments came out of a study of the Central Avenue corridor.

Other analyses done in 2010 covering redevelopment, flood prone areas, urban sprawl and energy efficiency are reasonably current and do not require update. No significant land use problems were identified in 2010 and no new problems have emerged in the years since.

### **Comprehensive Plan Amendments**

Another indicator of the comprehensive plan stability is evident in a review of the amendment history since 2010. The plan has been amended six times with five of the six amendments being the required annual update to the capital improvements program. One

additional amendment request to modify the conservation land use classification to accommodate commercial marinas was denied. The one other amendment (Ordinance 2016-001) amended the Town Center Mixed Use land use category to address issues arising from the Central Avenue Development Study. The amendments relaxed some policy conditions which were identified as unnecessarily limiting potential commercial development. The changes included:

1. An option for drive-thru facilities to the rear of buildings
2. A process to waive the maximum store unit size of 5,000 square feet
3. An option to allow one-story development with added building façade height
4. A process for addressing existing single-family units located in the TCMU area

There is nothing in this amendment history which suggests that modifications are required to the comprehensive plan future land use element. The record indicates a continuing effort to implement the comprehensive plan as amended in 2010 within an economy which has limited significant development over the intervening period.

## **LAND USE GOALS, OBJECTIVES AND POLICIES**

As noted above, the only amendments to Future Land Use goals, objectives and policies that have been identified since the last evaluation were completed in 2016. The Town has made progress on implementing the goals, objectives and policies in several areas, and no issues suggesting necessary amendments have been identified. No specific amendments that would result from statutory changes at the state level have been identified either.

A review of the goals, objectives and policies identified only two policies which had date specific performance times for implementation. Policy 1.18.1 and Policy 1.18.2 reference the amendment of the Town's land development code to conform the code requirements to the adopted objectives and policies. This work was to have been completed by the end of 2012. The Town has adopted LDC amendments implementing these policies so additional action is not required. The Town could consider amending these policies to eliminate the performance dates since the work has been completed and revise the policies to conform to a requirement to maintain consistency between the plan and the land development codes. This amendment, however, is not essential since the policies have been successfully implemented. Unless other amendments are required the Town should feel confident in leaving these policies in the plan as they are currently written. If the Town elects to make amendments to other comprehensive plan elements, these policies could be updated at that time as housekeeping changes.

## **FUTURE LAND USE ELEMENT RECOMMENDATIONS**

Absent required amendments to other elements of the comprehensive plan, the Town should not make any amendments to Future Land Use Element. Should other elements require EAR action, then Policies 1.18.1 and 1.18.2 may be updated as a housekeeping action.

## **TRANSPORTATION ELEMENT**

This section presents the Transportation Element for consideration. The Transportation Element is a key plan component linking the Future Land Use Plan to mobility of vehicles, goods and people in support of the Future Land Use Plan. Typically, transportation improvements are among the most expensive capital improvements a community undertakes and have the longest lead times for implementation. Therefore, a clear understanding of transportation needs and a well-articulated plan for transportation improvements is vitally important in implementing the Town's comprehensive plan.

### **TRANSPORTATION DATA AND ANALYSIS REVIEW**

The basic transportation system serving Howey-in-the-Hills remains unchanged since the 2010 comprehensive plan review. The arterial and collector network is the same. The only expansion has come with the opening of local streets in the Venezia South subdivision. Table 1 of the Transportation Element may be updated to include these roadways as part of the overall Town inventory. The one major programmed road improvement, the replacement of the SR 19 bridge remains in the Florida Department of Transportation work program with initial phases programmed within the current FDOT five-year work plan. The western terminus of this project at CR 48 remains an issue with a pending determination on whether a signalized intersection or a round-about will be included. The Town and local property owners prefer the signalized intersection while the Lake-Sumter TPO prefers the round-about solution.

#### **Existing and Projected Road Capacity**

Given the lagging growth in housing and non-residential development relative to the 2010 projections, it is not unexpected to find that traffic increases since 2010 have not been significant. Table 5 below is reproduced from the 2010 comprehensive plan document. It shows the projected average daily traffic for key roads within the Town. The next table provides the same data with actual 2015 traffic counts.

**Table 5: 2015 Projected LOS Capacity Analysis**

Road Name	From	To	No. Lanes	Functional Classification	Adopted LOS	LOS Capacity	Growth Rate	2015		
								AADT	V/C	LOS
CR 48	Lime Avenue	SR 19	2	Major Collector	D	13,680	4.03%	7,870	0.58	B
SR 19	Lake Harris North End	CR 48	2	Uninterrupted	C	15,100	2.07%	13,927	0.92	C
SR 19	CR 48	Central Ave.	2	Arterial 1	C	14,100	2.07%	7,914	0.56	B
SR 19	Central Ave.	CR 455	2	Uninterrupted	C	15,100	2.07%	7,914	0.52	B

**2015 Actual LOS Capacity Analysis**

Road Name	From	To	No. Lanes	Functional Classification	Adopted LOS	LOS Capacity	Growth Rate	2015		
								AADT	V/C	LOS
CR 48	Lime Avenue	SR 19	2	Major Collector	D	13,680	3.95%	8,181	0.60	B
SR 19	Lake Harris North End	CR 48	2	Uninterrupted	C	15,100	-7.34%	12,900	0.85	C
SR 19	CR 48	Central Ave.	2	Arterial 1	C	14,100	9.93%	8,700	0.62	B
SR 19	Central Ave.	CR 455	2	Uninterrupted	C	15,100	NA	NA	NA	B

The comparison of projected capacity to actual conditions shows relatively little change from the levels projected in 2010. Of note is that modest traffic growth on SR 19 through the Town center seems to be coming more from the Leesburg direction via County Road 48 rather than on SR 19 from Tavares. The comparison traffic count south of Town on SR 19 is no longer available so hard traffic data is not available for comparison. Anecdotally an increase in through traffic from this direction should be expected due to recent residential growth

occurring in the Groveland area. This review suggests that the traffic projections shown in Table 6 and Table 7 of 2010 plan element are still essentially valid. The Town needs to be vigilant in monitoring changes in traffic volumes as new projects are reviewed and through review of ongoing traffic planning by the TPO.

## **ANALYSIS OF CHANGED TRANSPORTATION CONDITIONS**

As noted above the available data shows that traffic conditions are generally the same as identified in 2010. Changes to the transportation program are largely based on policy decisions made over the past seven years.

The 2010 plan included a discussion about developing SR 19 through the core area of Howey-in-the-Hills as a three-lane section with center landscaped medians and turn lanes at selected intersections. After an extensive review of design options intended to implement this program, the Town has decided not to pursue the three-lane design. There were some technical difficulties in making the three-lane design work while maintaining full access to all properties fronting on SR 19, and there was a vigorous discussion of the policy alternatives as well. The Town has decided to maintain the current roadway profile with two through lanes and on-street parking. There remains some opportunity to add landscaping at intersections where bulb-outs may be employed.

The Town has pursued improvement of Central Avenue between Florida Street and Lakeshore Boulevard as part of the development of a core commercial area. The Town undertook a planning program for Central Avenue which included a supporting utility design, a market analysis and a conceptual streetscape plan. This effort has been followed up with a commitment to construct sewer in the portion of Central Avenue lying east of SR 19 and in the design of a more detailed streetscape plan for the Central Avenue corridor. The sewer extension was identified as the most essential element in promoting commercial development along Central Avenue, and the streetscape design offers the prospect of upgrading the public areas in support of anticipated private sector development.

Other topics address in the 2010 plan including evacuation routes, roadway classifications, constrained facilities, functional classifications, parking and intermodal systems are still current. The plan did inventory bicycle and pedestrian needs including a suggested bicycle and pedestrian master plan. This plan was not done and may lead to a minor policy amendment related to the timing of the proposed plan.



## TRANSPORTATION GOALS OBJECTIVES AND POLICIES

Since the last comprehensive plan update, no amendments have been made to the Transportation Element. A review of the goals, objectives and policies identified only one time specific action that was not completed. Policy 1.1.4 recommended adopting a bicycle and pedestrian master plan by 2012. The Town should assess whether it still wishes to complete this plan, and if so, establish a new completion date. This revision will also affect Policy 1.5.1 which identifies the 2012 completion date. The Town should consider deleting Policy 1.4.3 which addresses the three-lane design for SR 19. Presuming the Town has terminated this program as a desired project, then the policy supporting the project needs to be deleted from the plan.

## TRANSPORTATION ELEMENT RECOMMENDATIONS

Several minor adjustments to the Transportation Element are suggested by the analysis. These are identified as follows:

1. Update Table 1 to include the roads in the Venezia subdivision in the road inventory.
2. Amend policies 1.1.4 and 1.5.1 to establish a new deadline for completion of the bicycle and pedestrian master plan.
3. Delete Policy 1.4.3 supporting the three-lane design of SR 19.

## HOUSING ELEMENT

This report presents the Housing Element for consideration. The Housing Element deals with a range of issues related to the quantity and quality of housing the community, and these will be explored in this report based on housing trends and the goals, objective and policies contained in the Housing element.

## HOUSING DATA REVIEW

Since 2010, housing development in the Town has been nearly at a standstill. Available statistical data shows the housing stock increased by eight units over the five-year period between 2010 and 2015. With the restart of the Venezia Phase 1 subdivision, housing growth began a recovery in the late 2015 and 2016-time period. Current and recently completed construction includes more than 20 units. Appendix A includes several tables from the current plan element which have been reworked to include data from the 2010 Census and 2015 housing data from the American Community Survey. The data is organized to show trends within Howey-in-the-Hills rather than comparisons between the Town

and Lake County as a whole. There are some inconsistencies in the data from table to table due in part to the sampling process used and the small sample sizes that Howey-in-the-Hills yields as small town.

Given the very small growth in total housing units, major changes in the housing profile are not expected, and the comparison data generally supports this position. Of note:

- Single-family housing still comprises over 80% of the total housing units. Multi-family housing, primarily townhouse development, expected with the Village Mixed Use projects did not appear as these projects, with the exception of Venezia, were gobbled up by the recession. Several of these projects are being recast, but no active development is occurring.
- The rework of Table 4 shows housing values have drifted downward. The Town's housing stock, in terms of value, has clearly not fully recovered from the recession impacts. Despite this trend median housing value remains relatively high at \$171,900.
- The number of vacant housing units has decreased as units vacated during the recession have been reabsorbed by new owners and renters.
- Of units identified as vacant, a significant portion are identified as seasonally occupied. This factor tends to overstate the vacancy level somewhat.
- There has been some aging of the population. This trend is noticeable in many of the outer counties in the Orlando Metropolitan Area.

Other statistics indicate the Town has eliminated housing units that are declared overcrowded (more than one person per room) and housing units that lack a kitchen or lack some plumbing. While never a significant problem in the Town, this data suggests improvements in the overall condition of the housing stock however minor in scope. For 2015 the number of persons reported as living in poverty was 1.9%. When combined with the Town's median household income of \$63,021, affordable housing does not comprise a significant demand within the community.

## **ANALYSIS OF CHANGED HOUSING CONDITIONS**

Howey-in-the-Hills has relatively few issues with the quality of housing, and it has relatively little experience in dealing with low or moderate income housing, mobile homes, and even market rate multi-family housing. As noted above, demand for these types of housing has been relatively low in the community. The Town desires a housing stock that is largely owner occupied and dominated by single-family housing. The policies in the plan and the active market forces are producing this result, so the plan is effective in this regard. The Housing Element does include policies dealing with affordable housing issues, mobile homes, group housing, historic structures and other related issues. The Town will have guidance in addressing these housing issues should they arise.

One of the key items in the 2010 housing analysis is the identification of sufficient land area to support future housing demand. Actual demand has been lower than expected due to the lower than projected population growth. The conclusion is 2010 was that the Town did have sufficient available land area to support the projected housing need, and nothing has occurred in the succeeding years to alter this conclusion. The local market is in the process of

absorbing the 172-lot Venezia South subdivision while the Venezia North subdivision and Whispering Hills (107 lots) have progressed through the plat stage.

Much of the potential for housing diversity lies in the Village Mixed Use projects. Venezia is the first of these to come to market with the current single-family subdivision supported by commercial and townhouse development areas that are yet to be developed. There are three other VMU projects that received conceptual approval prior to the recession and have not resumed development. One of these, the Lake Hill development at SR 19 and CR 48 has received approval for a revised layout. The revised plan still contains single-family and townhouse residential units with some commercial development area and recreation facilities. Development timing on this project and the other VMU development is uncertain. However, these projects offer the opportunity to introduce a more diverse housing stock when the market demand appears. The comprehensive plan intended these projects to accommodate the mixed use and more diverse housing types so that the established single-family neighborhoods would maintain their traditional character. The plan to date is working in this regard and no major change in direction is indicated.

## **HOUSING GOALS OBJECTIVES AND POLICIES**

A review of the goals, objectives and policies that comprise the Housing Element identified two pairs of policies that had performance time frames associated with them. Policies 1.9.2 and 1.9.3 relate to an annual report on housing demand. This report has not been done, and really has not been necessary given the very low level of development demand. The Town should determine whether an annual report is useful and eliminate or modify the policies as appropriate.

Policy 1.11.3 required the Town to post information on the web site by 2012 regarding renewable energy systems. With the much greater abundance of internet sources for individuals to research these items, the posting of general information on renewable energy sources seems superfluous. This policy should be deleted. Policy 1.11.4 directed code provisions regarding green building practices be incorporated into the development regulations by 2012. This task has been accomplished and the policy may be modified or removed from the plan.

## **HOUSING ELEMENT RECOMMENDATIONS**

As other revisions to the comprehensive plan are expected, the housing element should be modified to update selected data tables and to modify the policies described in the preceding section.

**TABLE 1: HOUSING UNIT BY STRUCTURE TYPE  
HOWEY-IN-THE-HILLS**

Structure Type	2000		2010		2015	
	Number of Units	Percent of Total Units	Number of Units	Percent of Total Units	Number of Units	Percent of Total Units
Single-Family Detached	392	86.92%	510	81.4%	515	80.7%
Single-Family Attached	30	6.65%	34	7.0%	20	3.1%
Two-Family*	9	2.00%	0	0%	22	3.1%
Multi-Family	18	3.99%	86	11.6%	75	11.8%
Mobile Homes	2	0.44%	0	0%	6	1.3%
Other	0	0.00%	0	0%	0	0%
<b>Total</b>	<b>451</b>	<b>100.00%</b>	<b>630</b>	<b>100.00%</b>	<b>638</b>	<b>100%</b>

**TABLE 2: NUMBER OF YEAR-ROUND UNITS BY AGE - HOWEY-IN-THE-HILLS**

Year Constructed	2000		2010		2015	
	Number of Units	Percent of Total	Number of Units	Percent of Total	Number of Units	Percent of Total
2014 or Later					0	0.0
2010-2013					0	0.0
2000-2009			160	25.4	123	19.3
1990-1999	93	20.6	75	11.9	126	19.7
1980-1989	59	13.1	56	8.9	93	14.6
1970-1979	86	19.1	93	14.8	79	12.4
1960-1969	64	14.2	64	10.2	57	8.9
1959-1959	90	20.0	129	20.5	104	16.3
1940-1949	11	2.4	16	2.5	12	1.9
1939 or Earlier	48	10.6	37	5.8	44	6.9

**TABLE 3: HOUSING CHARACTERISTICS BY TENURE  
HOWEY-IN-THE-HILLS**

Tenure	2000		2010		2015	
	Units	Percent	Units	Percent	Units	Percent
Total Housing Units	451	100.0	630	100.0	638	100.0
Owner-Occupied	336	74.5	407	64.6	442	69.3
Renter Occupied	54	12.0	77	12.2	85	13.3
Vacant Housing Units	61	13.5	146	23.2	111	17.4
Vacant Housing Units (For Seasonal or Recreational Use)	24	39.3	32	21.9		

**TABLE 4: VALUE OF SPECIFIED OWNER OCCUPIED HOUSING UNITS  
HOWEY-IN-THE-HILLS**

Total Value	2000		2010		2015	
	Number Of Units	Percent of Total	Number of Units	Percent of Total	Number of Units	Percent of Total
<\$50,000	8	2.56%	7	1.7	25	5.7
\$50,000-\$99,999	119	38.14%	34	8.4	42	9.5
\$100,000-\$149,999	94	30.13%	30	7.4	111	25.1
\$150,000-\$199,999	60	19.23%	90	22.1	99	22.4
\$200,000-\$299,999	25	8.01%	126	31.0	103	23.3
\$300,000-\$499,000	4	1.28%	100	24.6	59	13.3
\$500,000-\$999,999	2	0.64%	20	4.9	3	0.7
\$1,000,000 or more	0	0.00%	0	0.0	0	0.0
<b>Total</b>	<b>312</b>	<b>100.00%</b>	<b>407</b>	<b>100.0</b>	<b>442</b>	<b>100.0</b>

**TABLE 10: POPULATION PROJECTION BY AGE  
HOWEY-IN-THE-HILLS**

<b>Age Group</b>	<b>2010 PLAN</b>	<b>2010 CENSUS</b>	<b>VARIANCE</b>	<b>2015 ESTIMATE</b>
0-14 years old	184	148	-36	166
15-24 years old	135	108	-28	107
25-34 years old	72	84	12	119
35-44 years old	121	131	10	143
45-54 years old	270	183	-87	151
55-64 years old	200	194	-6	196
65-74 years old	150	137	-13	205
75+ years old	93	113	20	147
<b>Total</b>	<b>1,225</b>	<b>1098</b>	<b>-127</b>	<b>1234</b>

## PUBLIC FACILITIES ELEMENT

The Public Facilities Element covers five basic services including sanitary sewer, potable water, solid waste, storm water drainage and aquifer recharge. This analysis will review changes impacting each of these services occurring since 2010 and review potential amendments to the goals, objectives and policies. To the extent that the demand for these services is population driven, total demand for the planning period will be less than the demand levels projected in 2010 due to lower population growth. Projections to 2025 are very similar to the 2010 numbers and no change in the magnitude of service demand is anticipated. (Refer to the Future Land Use Element report for the details on the revised population.) The basic land use structure of the Town has also remained essentially the same since 2010 so the area of geographic impact for these services remains the same as well. Because of the lesser impacts over time on these services, the data and analysis review and summary of changed conditions have been combined into one section.

### PUBLIC FACILITIES DATA AND ANALYSIS

The element begins with a summary of population by age range. As noted above, the actual population falls below the 2010 levels and projections remain very close to the 2010 numbers. The details can be reviewed in the Future Land Use Element review. The following sections offer a summary of each service.

#### **Sanitary Sewer**

The Town continues to purchase wholesale sewer service from the Central Lake Community Development District and in turn provide retail service to customers within the Town. Since 2010 the Venezia South subdivision has connected to the sewer system as has the Lake Hills School and Boondock's restaurant. The Town has received a grant to begin the installation of sanitary sewer on Central Avenue, with the first phase of this installation from SR 19 to Lakeshore Drive scheduled for 2017. The second phase extending from SR 19 to Florida Avenue is expected to follow shortly. The only other significant development approval since 2010 is the Whispering Hills Subdivision off Buckhill Road which is planned to use septic tanks in accordance with an annexation agreement approved prior to the initiation of the Town's sanitary sewer program. The Central Avenue sewer system has been designed so that it is expandable to serve most of the existing residential development area when the opportunity to expand into these locations arises. Other major developments approved through the Town's planned unit development process are committed to using sanitary sewer.

## Solid Waste

The solid waste management program is essentially the same as in 2010. The Town has changed the collection contractor, but the disposal site and projected volumes remain the same. The projection of total waste generated is currently less than projected in 2010 due to the reduced population growth and projections through 2025 are very similar to the 2010 projections. Table 3 is revised as shown below.

**Table 3: Solid Waste Level of Service Projections, 2010 - 2025**

Year	Population	Adopted LOS Standard	Pounds per Year	Pounds per Day
2010	1,225	6 pounds per person per day	2,682,750	7,350
2015	1,341	6 pounds per person per day	2,936,790	8,046
2020	1,467	6 pounds per person per day	3,212,730	8,802
2025	1,594	6 pounds per person per day	3,490,860	9,564

**Table 3: Solid Waste Level of Service Projections, 2010 – 2025 (Revised)**

Year	Population	Adopted LOS Standard	Pounds per Year	Pounds per Day
2010	1,008	6 pounds per person per day	2,207,520	6,048
2015	1,106	6 pounds per person per day	2,422,140	6,636
2020	1,520	6 pounds per person per day	3,328,800	9,120
2025	1,652	6 pounds per person per day	3,617,880	9,912

The list of potential hazardous waste generators remains unchanged.

## Drainage

No changes have been made to the overall drainage system serving the Town. The Town has adopted storm water management regulations and applies these regulations to all new development. The Venezia South Subdivision was approved with a system meeting current requirements and has been developed in accordance with the approved plans. The Whispering Hills subdivision has been approved with a drainage system meeting current requirements, but no site development has occurred to date.



## **Potable Water**

The Venezia South Subdivision has been the only major new water customer added to the system since 2010. The Town did add a new raw water well, but this well has run into some production difficulties and options, including a replacement well, are currently being explored.

## **Natural Groundwater Aquifer Recharge**

No changes have occurred relative to this sub-element. The Town has adopted and maintains regulations which preserve aquifer recharge.

## **PUBLIC FACILITIES GOALS, OBJECTIVES AND POLICIES**

A review of the goals, objectives and policies has identified a handful of policies that could benefit from some clarification or minor revision. The following policies are noted:

- Policy 1.2.6 requires interlocal agreements of sewer service provision. This policy seems to be accomplished by the current agreement with the Central Lake CDD. This policy should be deleted or revised to reflect the current status.
- Policies 1.8.3 and 1.8.4 provide specifics regarding water system storage capacity and system delivery pressures. If the Town is compliant with these requirements, the policies could be modified. It is unusual to have this level of system specification in the comprehensive plan, and the Town may want to consider a more general statement about the water system operating characteristics.
- Policy 1.13.1 cites a water supply work plan. The work plan needs to be evaluated to determine if it is still valid in all aspects; and then the policy needs to be modified accordingly. The work plan components might be better addressed as elements of the capital improvements plan since the Town is within the last five years of the proposed water work plan.
- Objective 1.14 requires the evaluation of the water work plan to be done as part of this evaluation and appraisal. Since that step is being addressed, the objective and supporting policies may be deleted as accomplished.
- Policy 2.1.1 calls for a Town Center stormwater master plan to be completed by 2010. This plan may need to be rescheduled

## **PUBLIC FACILITIES ELEMENT RECOMMENDATIONS**

The policy issues noted above should be reviewed as part of an overall tune-up of the plan, and associated maps need to be reviewed for accuracy and current status.

## RECREATION AND OPEN SPACE ELEMENT

The Recreation and Open Space Element is another one of the population based elements in terms of assessing level of service compliance and needed facilities. As we have seen with other population based elements, the service demands are less than projected in 2010 due to the lower population growth. This section will examine the changes that have occurred since 2010 and identify any needed updates to the plan element. This actively element is used by the Parks and Recreation Advisory Board as well as the Planning Board, and both advisory bodies should be included in the review.

### RECREATION AND OPEN SPACE DATA AND ANALYSIS

The set of tables in the element need to be updated to reflect additions and modifications to the park inventory and the system performance relative to the designated level of service.

**Table 1: Howey-in-the-Hills Parks, 2010**

Park	Acreage
Griffin Park	5.5 acres
Sarah Maude Nature Preserve	54.4 acres preserve 16.9 upland acres
Blevins Park	0.25 acres
Market Park	0.11
Tangerine Point Park	0.1 acres
Central Park	0.43 acres
<b>TOTAL</b>	<b>23.29 acres</b>

This revised Table 1 reflects the addition of two small parcels to the parks inventory. The first parcel is a landscaped area at (insert street) which includes a garden and a memorial area. The second parcel is located across from Town Hall north of the Howey Market which is currently undeveloped but has been designated for development as a community green space.

Of the other facilities on the inventory, several have undergone significant updates. The nature walk in the Sarah Maude Mason Preserve has undergone renovation and

educational signage has been added. Central Park has been upgraded with the expansion of the basketball court to a full-size court; the addition of play equipment; a picnic facility and a four-square game court. Griffin Park is being upgraded with new play equipment and upgraded seating and picnic facilities. The Town is also seeking funding to add structured parking to the boat ramp. While these improvements are not adding park area, they are improving the recreational opportunity and experience for Town residents and visitors.

**Table 2: Existing Levels of Service for Parks, 2010**

Land/Facility	LOS	Adopted LOS	Land/Facilities Needed Based on BEBR Pop. Of 1,106 as of 2015	Surplus or Deficiencies 2015
Park Space	23.29 acres	6.5 acres of park space per 1,000 residents	7.2 acres of park space	Surplus of 16.09 acres

Land/Facility	LOS	Adopted LOS	Land/Facilities Needed Based on 2025 Projected Population of 1,594	Surplus or Deficiencies 2025
Park Space	23.29 acres	6.5 acres of park space per 1,000 residents	10.36 acres of park space	Surplus of 12.93 acres

The revised Table 2 presented above shows that the current Town position relative to parkland area has improved since 2010 due to the minor additions of park land and lower than expected population growth. Projecting forward to 2025, there Town's inventory of recreation facilities will continue to exceed the level of service for park area. The inventory of other facilities including county parks, school lands, the library and private recreation remains unchanged. There is an active plan to expand the library building through the addition of community meeting space.

## **RECREATION AND OPEN SPACE GOALS, OBJECTIVES AND POLICIES**

A review of the goals, objectives and policies did not identify any obvious amendments. The policies include recommended facilities per unit of population (Policy 1.1.2) but these are guidelines rather than minimum levels of service. Many of the noted facilities are provided by the private sector such as tennis and golf (Mission Inn) and by Lake County for team sports. The capital improvements element has included proposals for long-range provision of park

space keyed to the planned Village Mixed-Use projects. The facilities are identified as the north and south neighborhood parks. As the Village Mixed Use projects develop, the Town will include park facilities in the planning of these developments. The Town may want to formalize this intent in the plan policies.

The plan element also includes specific policies about open space to be incorporated into new development. These policies have been adopted into the Town's land development regulations and are being implemented as new development comes forward.

## PUBLIC SCHOOL FACILITIES ELEMENT

The Public School Facilities Element (PSFE) was adopted in response to a state mandate that public schools be added to local government comprehensive plans and that school capacity be included as one component of the concurrency evaluation for new development. The Planning Board will recall that the concurrency process is designed to ensure that adequate public services will be available to support new development at the time the service impacts of that development occur. This directive put school capacity on the same footing as traffic capacity, potable water and the other basic services that local government provides.

After the Town's last comprehensive plan evaluation, the state modified the requirements for schools so that schools are no longer a required element of the comprehensive plan and that school capacity is no longer a mandatory component of the concurrency evaluation process. However, unless the local government repealed their PSFE, the adopted PSFE is still in effect as an optional element of the comprehensive plan. This is the status of the PSFE for Howey-in-the-Hills. The Public School Facilities Element is still in effect, and the Town does consider available school capacity as one of the factors applied in making a concurrency determination for any new residential development proposals. The following sections will provide an initial assessment of the current element and discuss areas that may be considered for review and revision.

### PSFE DATA AND ANALYSIS REVIEW

The PSFE has a limited data set consisting of a population projection and the 5-year school district capital program that concluded in 2014. Both data sets are out of date. We may not need to replicate them in an updated element as both can be incorporated by reference to the population projections elsewhere in the plan and by reference to the adopted school 5-year plan. The Town would review the school district capital program as part of our annual CIP update.

Given that the Town's population growth has lagged behind the 2010 projections, we can expect that the growth in student population has lagged as well. The Town regularly coordinates with the school district staff by providing data on new residential permits and newly issued certificates of occupancy. The Town also includes school district staff in the review of proposed residential developments. As noted in an earlier report, the Town has committed capacity to the Venezia South

project and to Whispering Hills. As long as these developments are active, they are considered to have met concurrency and will not be retested when residential permits are issued. The Town will continue to monitor housing construction and report this information to the school district.

While it does not affect the specific content of the PSFE, the Town will want to review the status of the large Village Mixed Use projects including The Reserve and Mission Rise. These developments were approved prior to the adoption of school concurrency and have been considered exempt from school concurrency review. The Lake Hills project is considered subject to concurrency review. At some point in time, the Town may wish to review the status of the “exempt” projects to determine if and when the grandfathering status should expire. In any event, it may be desirable to include a policy statement in the plan clarifying the status of these projects.

There are a couple of other process components that the Planning Board should discuss as part of the comprehensive plan review. First, the PSFE works in conjunction with an interlocal agreement entered into by the school district and all of the local governments in Lake County. This agreement defines the responsibilities of each entity in administration of the school planning and concurrency program. The interlocal agreement is the document that organizes the various technical and policy bodies that work on school planning; it specifies the data to be provided by all parties; and it includes a process for dispute resolution should disagreements arise.

The second point the Planning Board should understand is that concurrency for school capacity operates a little differently than does other types of concurrency review. For services such as recreation, water, sewer, etc. the analysis of service capacity falls within the Town and the Town is responsible for addressing any service deficiencies within the Town. For school concurrency, the plan identifies concurrency service areas which include land beyond the Town’s jurisdiction. Available student capacity is based on the assigned school concurrency area applicable to the Town. The concurrency service areas will be different for elementary, middle and high schools. In addition to testing a project within its assigned concurrency service area, the school district is obligated to test the project against adjacent concurrency service areas if the initial concurrency service area is over capacity. The reason for this is that the planning process assumes the school district can redraw attendance boundaries to re-assign capacity and maximize the use of available student stations.

The concurrency review process can raise some planning issues when rapidly growing areas can reach out to adjacent concurrency service areas and absorb capacity originally available to slower growing communities. For example, the rapidly growing South Lake County area is likely doing this now as the school district attempts to cope with rapid residential growth in advance of providing new schools to serve this population. There really is no effective way to “prevent” this process from occurring. This opportunity does suggest it is important for the Town to be clear in its provision of data to the school district in terms of what projects the Town considers vested projects.

## **PSFE GOALS, OBJECTIVES AND POLICIES**

An initial examination of the goals, objectives and policies in the PSFE does not indicate a need for substantial revision. Policy 1.1.2 can be deleted as the requirement for the effective date for the initiation of school concurrency has passed and the policy has been implemented. Staff discussed the

element with school district staff and they did not indicate a need for any major revisions. No changes to school concurrency areas are contemplated at this time.

## CONSERVATION ELEMENT

The Conservation Element includes a summary of resources within the Town including lakes and streams, groundwater, mineral resources, soils, vegetation and environmentally sensitive land area. The report presents a summary of soils data which is still current and a summary of land cover which is also reasonably current. The element includes a review of flood plain areas and topography. The flood plain maps have undergone updates by FEMA and need to be reviewed to verify the maps in the plan are current. The other maps showing soils and topography remain current.

A review of the goals, objectives and policies does not show a need for any obvious revisions. Policy 1.2.1 provides some restrictions on manufacturing uses, but the placement of planned light industrial land use on the future land use map is consistent with this policy. No change is likely need to this policy.

## INTERGOVERNMENTAL COORDINATION ELEMENT

The Intergovernmental Coordination Element is a “process” element which specifies how the Town will interact and coordinate with other local governments and agencies having an interest in the outcomes from the Town’s planning activities. Its purpose is to identify and resolve incompatible goals, objectives, policies and development proposed in local government comprehensive plans and to determine and respond to the needs for coordination processes and procedures with adjacent local governments, and regional and state agencies. The element includes an inventory of active agreements for joint services and cooperative activities with other agencies and local governments. The element also includes an inventory of agencies and local governments where coordination activities will be ongoing.

The most active coordination efforts have been with Lake County and with the Lake County School Board. Lake County and the Town have shared notices of proposed comprehensive plan amendments and proposed rezoning activities so each local government has an opportunity to comment on planned amendments. The Town has also routinely provided data to the School Board staff about planned developments and construction permitting so the school district can effectively plan for any changes in the demand for student stations. This activity is essential to support effective school concurrency.

The goals, objectives and policies basically describe the process to be applied to coordination efforts, and in some cases, the policies direct the desired coordination outcomes. There are some policies, such as coordination on campus master plans, that were required by state rules but are not

active because no plans have come forward. There are some policies which include performance dates which need to be updated. These include:

- Policy 1.1.4 regarding annexation. This agreement was completed. And has recently been updated.
- Policy 1.5.10 regarding utility service area agreements. The referenced communities have agreed upon the specified service areas.
- Policy 1.7.1 regarding mutual review of project information and concurrency assessment with Lake County.
- Policy 1.8.1 regarding an informal mediation process which was to be in place by 2012.

## CAPITAL IMPROVEMENTS ELEMENT

Like the Intergovernmental Coordination Element, the Capital Improvements Element is essentially a process element that draws on the other elements in the plan to identify the community standards expressed as levels of service, compares the adopted LOS to the existing and short-term development conditions, and identifies any capital improvements needed to meet the adopted standards. A key component of the CIE is the capital improvements schedule, which is a five-year plan for proposed capital projects. The capital projects schedule is required to be updated on an annual basis, and the Town has been complying with this requirement. The most recent schedule is attached as an exhibit. Since the Town has remained current with this requirement, no remedial action is required.

As presented in the current plan, the CIE describes the organization of the capital improvements program and identifies the types of projects to be included in the capital improvements schedule. The element describes the types and sources of revenue available to address capital needs and provides an extensive analysis of the financial feasibility of the capital improvements program including a projection of revenues. The revenue stream projections are no longer current. The element also includes goals, objectives and policies which specify the adopted levels of service developed in each of the other elements. Since 2010, no other element has undergone as extensive a modification of the requirements and rules. The financial feasibility requirement is no longer applicable to the same degree as previously, and administrative rule governing the CIE has been repealed. The excerpt provided below is the current state law governing the requirements for the capital facilities element. The current element quotes extensively from the former Rule 9J-5 which gave detailed requirements that the CIE had to meet.

With the repeal of 9J-5, the section from the Florida Statutes presented below is the controlling regulation. Local governments have much more discretion now in how the CIE is constructed, and the requirement for detailed analysis demonstrating that the capital improvements schedule is financially feasible is no longer applicable. As result of these legislative changes, substantial portions of current plan element need to be re-written. The basic process for identifying and managing capital projects as set forth in the current element is sound and may be retained, but the detailed references to the rule which has been rescinded need to be removed and substantial portions of the element revised. Not only will the overall text need to be reviewed and updated, the review should also include an examination of data in the appendices and the attached tables to determine if this information is relevant and essential under the modified state requirements.

### **Capital Facilities Element Requirements (FS 163.3177(3))**

3)(a) The comprehensive plan shall contain a capital improvements element designed to consider the need for and the location of public facilities in order to encourage the efficient use of such facilities and set forth:

1. A component that outlines principles for construction, extension, or increase in capacity of public facilities, as well as a component that outlines principles for correcting existing public facility deficiencies, which are necessary to implement the comprehensive plan. The components shall cover at least a 5-year period.
2. Estimated public facility costs, including a delineation of when facilities will be needed, the general location of the facilities, and projected revenue sources to fund the facilities.
3. Standards to ensure the availability of public facilities and the adequacy of those facilities to meet established acceptable levels of service.
4. A schedule of capital improvements which includes any publicly funded projects of federal, state, or local government, and which may include privately funded projects for which the local government has no fiscal responsibility. Projects necessary to ensure that any adopted level-of-service standards are achieved and maintained for the 5-year period must be identified as either funded or unfunded and given a level of priority for funding.
5. The schedule must include transportation improvements included in the applicable metropolitan planning organization's transportation improvement program adopted pursuant to s. 339.175(8) to the extent that such improvements are relied upon to ensure concurrency and financial feasibility. The schedule must be coordinated with the applicable metropolitan planning organization's long-range



**TABLE 20**  
**TOWN OF HOWEY-IN-THE-HILLS, FLORIDA**  
**5-YEAR ESTIMATED SCHEDULE OF CAPITAL IMPROVEMENTS**

Description	Funding Source	Total Cost	FY 2015 2016	FY 2016 2017	FY 2017 2018	FY 2018 2019	FY2019 2020	CIP Total
<b>Public Services</b>								
N. Water treatment plant improvements	A/B/F	\$ 250,000	\$ 50,000					\$ 50,000
North well	A/B/F	\$ 1,000,000					\$ 25,000	\$ 25,000
Water mains - south	B	\$ 1,000,000				\$ 100,000	\$ 600,000	\$ 700,000
Water mains - north	B	\$ 1,200,000				\$ 50,000		\$ 50,000
Central Avenue Sewer/Water/Drainage	B/F	\$ 1,156,000		\$ 1,156,000				\$ 1,156,000
Central Avenue Streetscape	A	\$ 100,000		\$ 500,000				\$ 500,000
Equipment purchases	A	\$ 132,000	\$ 10,000	\$ 30,000	\$ 12,000	\$ 10,000	\$ 10,000	\$ 62,000
Street Paving	A	\$ 156,000	\$ 32,000	\$ 32,000	\$ 32,000	\$ 32,000	\$ 32,000	\$ 128,000
Public Services Reroof	A	\$ 30,000	\$ 30,000					\$ 30,000
Palm and Central Intersection	A/D	\$ 23,700	\$ 23,700					\$ 23,700
Sidewalk and Lighting Improvements	A	\$ 150,000		\$ 75,000	\$ 75,000			\$ 150,000
Annual stormwater improvements	A/B/D/F	\$ 150,000	\$ 30,000	\$ 30,000	\$ 30,000	\$ 30,000	\$ 30,000	\$ 120,000
<b>Police Department</b>								
New police station	B/D/F	\$ 1,500,000				\$ 650,000	\$ 850,000	\$ 1,500,000
Vehicle replacement	A	\$ 295,800	\$ 57,200	\$ 80,400	\$ 62,500	\$ 62,500	\$ 62,500	\$ 262,600
Technology	A/B/D/F	\$ 44,100	\$ 8,600	\$ 9,500	\$ 9,500	\$ 9,500	\$ 9,500	\$ 37,100
<b>Community Facilities</b>								
Library addition	A/B/D/F	\$ 575,000			\$ 500,000			\$ 500,000
Design for new Town Hall	A	\$ 50,000					\$ 50,000	\$ 50,000
Central Avenue Streetscape Design	A	\$ 50,000		\$ 50,000				\$ 50,000
Wayfinding Signage	A/B/D/F	\$ 80,000		\$ 80,000				\$ 80,000
Replace Town Hall Windows	A	\$ 20,000		\$ 20,000				\$ 20,000
<b>Parks and Recreation</b>								
Purchase land for new park	A/B/D/E/F	\$ 150,000				\$ 150,000		\$ 150,000
Repair/repalce finger piers	A/B/D	\$ 55,000		\$ 15,000	\$ 10,000	\$ 10,000	\$ 10,000	\$ 35,000
Main Pier Redecking	A/B/D	\$ 15,000			\$ 15,000			
Repair/renovate Sara Maud Park	A/B/D	\$ 84,300	\$ 84,300					\$ 84,300
Upgrade Central Park	A/B/D	\$ 50,000	\$ 50,000					\$ 50,000
Improvements to Griffin Park	A/B/D	\$ 300,000	\$ 50,000	\$ 75,000	\$ 75,000	\$ 100,000		\$ 300,000
Neighborhood Park North End	A/B/D/E/F	\$ 125,000				\$ 125,000		\$ 125,000
Neighborhood Park South End	A/B/D/E/F	\$ 125,000				\$ 125,000		\$ 125,000
Blevins Park	A/B/D	\$ 25,000	\$ 5,000	20000				\$ 25,000
Market Park	A/B/D	\$ 5,000	\$ 5,000					\$ 5,000

TABLE 20								
TOWN OF HOWEY-IN-THE-HILLS, FLORIDA								
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Water mains - south	B	\$ 1,000,000				\$ 100,000	\$ 600,000	\$ 700,000
Water mains - north	B	\$ 1,200,000				\$ 50,000		\$ 50,000
Central Avenue Sewer/Water/Drainage	B/F	\$ 1,156,000		\$ 1,156,000				\$ 1,156,000
Central Avenue Streetscape	A	\$ 100,000		\$ 500,000				\$ 500,000
Equipment purchases	A	\$ 132,000	\$ 10,000	\$ 30,000	\$ 12,000	\$ 10,000	\$ 10,000	\$ 62,000
Street Paving	A	\$ 156,000	\$ 32,000	\$ 32,000	\$ 32,000	\$ 32,000	\$ 32,000	\$ 128,000
Public Services Reroof	A	\$ 30,000	\$ 30,000					\$ 30,000
Palm and Central Intersection	A/D	\$ 23,700	\$ 23,700					\$ 23,700
Sidewalk and Lighting Improvements	A	\$ 150,000		\$ 75,000	\$ 75,000			\$ 150,000
Annual stormwater improvements	A/B/D/F	\$ 150,000	\$ 30,000	\$ 30,000	\$ 30,000	\$ 30,000	\$ 30,000	\$ 120,000
<b>Police Department</b>								
New police station	B/D/F	\$ 1,500,000				\$ 650,000	\$ 850,000	\$ 1,500,000
Vehicle replacement	A	\$ 295,800	\$ 57,200	\$ 80,400	\$ 62,500	\$ 62,500	\$ 62,500	\$ 262,600
Technology	A/B/D/F	\$ 44,100	\$ 8,600	\$ 9,500	\$ 9,500	\$ 9,500	\$ 9,500	\$ 37,100
<b>Community Facilities</b>								
Library addition	A/B/D/F	\$ 575,000			\$ 500,000			\$ 500,000
Design for new Town Hall	A	\$ 50,000					\$ 50,000	\$ 50,000
Central Avenue Streetscape Design	A	\$ 50,000		\$ 50,000				\$ 50,000
Wayfinding Signage	A/B/D/F	\$ 80,000		\$ 80,000				\$ 80,000
Replace Town Hall Windows	A	\$ 20,000		\$ 20,000				\$ 20,000
<b>Parks and Recreation</b>								
Purchase land for new park	A/B/D/E/F	\$ 150,000				\$ 150,000		\$ 150,000
Repair/repalce finger piers	A/B/D	\$ 55,000		\$ 15,000	\$ 10,000	\$ 10,000	\$ 10,000	\$ 35,000
Main Pier Redecking	A/B/D	\$ 15,000			\$ 15,000			
Repair/renovate Sara Maud Park	A/B/D	\$ 84,300	\$ 84,300					\$ 84,300
Upgrade Central Park	A/B/D	\$ 50,000	\$ 50,000					\$ 50,000
Improvements to Griffin Park	A/B/D	\$ 300,000	\$ 50,000	\$ 75,000	\$ 75,000	\$ 100,000		\$ 300,000
Neighborhood Park North End	A/B/D/E/F	\$ 125,000				\$ 125,000		\$ 125,000
Neighborhood Park South End	A/B/D/E/F	\$ 125,000				\$ 125,000		\$ 125,000
Blevins Park	A/B/D	\$ 25,000	\$ 5,000	20000				\$ 25,000
Market Park	A/B/D	\$ 5,000	\$ 5,000					\$ 5,000

## CONCURRENCY MANAGEMENT

***Concurrency is the process of determining that there is or will be sufficient service capacity available to meet the needs of a new development at the time the service impacts from that development occur.*** Concurrency can be met by demonstrating that the Town has the capacity to serve a project or through the identification of planned improvements included in the capital improvements schedule will have the capacity to provide services at or before the time those services will be required. If the services are not available or cannot be made available in the appropriate time frame, the impacted development may not be approved or may not be approved in full.

Concurrency management is a continuing requirement under the comprehensive plan, but it is not strictly identified by the state law as minimum required plan element. The Town has chosen to set up the concurrency management system as an element with specific goals objectives and policies that identify the minimum standards to meet concurrency and the describing the process for operating the concurrency management system. This plan element is closely aligned with Chapter 10 of the land development regulations. Chapter 10 establishes the specific requirements under which a development demonstrates compliance with the concurrency requirements.

Given the limited level of development that has occurred in the Town since 2010, concurrency assessment has not been at the forefront of the Town's planning agenda. Generally, the Town is in good condition relative to the availability of service capacity, and therefore, there has not been any discussion of service shortfalls. The Town has committed service capacity to the balance of the Venezia South development and to the Whispering Hills subdivision. The major developments approved as planned unit development projects within the Village Mixed Use land use category have undergone a general service capacity review at the planning level, but when these projects are present for subdivision and site plan review, the concurrency process specified in this plan element and in the land development regulations will be applied. If there is a service gap, then additional actions to assure the provision of services will be required before a development order may be issued to allow the project to proceed.

This element needs very little work to bring it up do date. There are some references to the rescinded Rule 9J-5 that need to be edited, but otherwise the element should be acceptable as presented.

## PUBLIC PARTICIPATION

As with several of the plan elements reviewed in this report, the Public Participation Element is essentially a commitment to and a process for ensuring public notice of planning activities and the provision of opportunities for the general public to participate in the planning process as they desire.

Chapter 4 of the land development regulations is the companion code to this comprehensive plan element. Chapter 4 specifies the public notice requirements that must be met for a full range of planning activities including comprehensive plan amendments, land development code amendments, site plan and subdivision approval, and variance to the development codes. No changes other than minor reference edits are required to the section of the comprehensive plan.