

South  
Florida  
Regional  
Planning  
Council



September 7, 2007

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

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

Dear Mr. Riel:

The South Florida Regional Planning Council has completed its 60-day preliminary sufficiency review of the Revised Evaluation and Appraisal Report (EAR) for the City of Coral Gables Comprehensive Plan adopted by Resolution No. 2007-151 on June 26, 2007. This letter is to advise you that the Revised EAR has been determined to be sufficient to meet the requirements of Section 163.3191, Florida Statutes (F.S.). This finding of Sufficiency should be taken as the final determination on the Report.

Please note that a sufficiency determination does not constitute a compliance review of the proposed amendments identified in the Report. The amendments referenced in the Report, as well as any other amendments shall be reviewed for consistency with Chapter 163, Part II, F.S., and Rule 9J-5, Florida Administrative Code when submitted as proposed amendments.

When preparing the EAR-based amendment, the City must take into consideration the new 2005-2007 statutory requirements for Chapter 163, F.S. SFRPC staff is available to provide any needed assistance to the City as it prepares the EAR-based amendments. If you have any questions, please do hesitate to contact Roger Anderson, or me, at (954) 985-4416.

Sincerely,

Terry Manning  
Senior Planner

Attachments

cc: Ray Eubanks, Department of Community Affairs, Plan Processing Team  
Javier Betancourt, Principal Planner, City of Coral Gables

## **ADVISORY REPORT**

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

September 2007

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#### **INTRODUCTION**

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

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

#### **Comprehensive Plan Status**

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

#### **Letter of Understanding**

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

#### **Adopted Evaluation and Appraisal Report Review Findings and Recommendations**

The Revised EAR was submitted on July 5, 2007 after new legislation was put into effect that changes the evaluation requirements for EARs. The City should note that 163.319(2) F.S., as amended by Senate Bill (SB) 360, which became effective July 1, 2005, now includes two new evaluation requirements: (o) and (p), which concern transportation concurrency exception areas, transportation concurrency management areas, multimodal transportation districts, and transportation concurrency methodologies.

The SFRPC's review of the City of Coral Gables Revised Adopted EAR has determined that the EAR does review the performance of the City's Comprehensive Plan. The SFRPC's review of the Revised Adopted EAR finds that the EAR is sufficient. It is recommended that the City consider the comments detailed below when considering EAR-based amendments.

#### **EAR CONTENT REQUIREMENTS**

A summary of the Revised Adopted EAR review is included below. Specific needs for additional information or clarification that should be addressed in the EAR-based amendments are discussed in the analysis of each major issue.

**I. EAR INTRODUCTION SECTION**

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

Sufficient

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

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

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

Comment: Chapter 163.3191, F.S., requires that the EAR evaluate the financial feasibility of implementing the comprehensive plan and of providing needed infrastructure to achieve and maintain adopted level-of-service standards and sustain concurrency management systems through the Capital Improvements Element, as well as the ability to address infrastructure backlogs and meet demands on public services and facilities. In the revised traffic analysis, the Table “2015 Traffic Level of Service Findings” outlines four roadway segments failing the LOS standards. The City does not address mitigation measures for these road segments in its analysis. The City also does not include data and analysis that support a Capital Improvements Program addressing future capital investments and its financial feasibility to ensure maintenance of the adopted LOS. It is recommended that the City, in its EAR-based amendments, provided a comprehensive analysis and a detailed, realistic plan on how the budgeted money for the next five years will be used to address the traffic issues within the City. This could be accomplished by a Transportation Master Plan which develops mitigation measures that are specific to the roadway segments that are projected to fail the LOS standards. The Capital Improvements Program should provide a detailed list of projects that would implement the mitigation measures for the specific roadway segments that are projected fail. The Capital Improvements Element should also identify a funding source for each specific transportation improvement project.

See also the attached comments from the Florida Department of Transportation.

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

Comment: The City has developed and utilized its own population projections for the EAR. For the EAR-based amendment it is recommended that if City does not utilize BEBR population projections, any population projection methodology be approved by the Florida Department of Community Affairs. See also the attached comments from the Florida Department of Community Affairs.

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

Sufficient

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

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

Sufficient

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

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

Sufficient

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

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

Sufficient

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

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

Sufficient

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

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

Sufficient

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

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

Sufficient

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

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

Sufficient

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

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

Sufficient

**IX. MAJOR ISSUES**

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

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

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

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

Sufficient

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

Sufficient

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

Sufficient

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

Sufficient

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

Sufficient

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

Sufficient.

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

Sufficient

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

Sufficient

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

Sufficient

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

Sufficient

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

Sufficient

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

Sufficient.

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

*Comment:* Chapter 163.3191, F.S., requires that the EAR evaluate the financial feasibility of implementing the comprehensive plan and of providing needed infrastructure to achieve and maintain adopted level-of-service standards and sustain concurrency management systems through the Capital Improvements Element, as well as the ability to address infrastructure backlogs and meet demands on public services and facilities. In the revised traffic analysis, the Table “2015 Traffic Level of Service Findings” outlines four roadway segments failing the LOS standards. The City does not address mitigation measures for these road segments in its analysis. The City also does not include data and analysis that support a Capital Improvements Program addressing future capital investments and its financial feasibility to ensure maintenance of the adopted LOS. It is recommended that the City, in its EAR-based amendments, provided a comprehensive analysis and a detailed, realistic plan on how the budgeted money for the next five years will be used to address the traffic issues within the City. This could be accomplished by a Transportation Master Plan which develops mitigation measures that are specific to the roadway segments that are projected to fail the LOS standards. The Capital Improvements Program should provide a detailed list of projects that would implement the mitigation measures for the specific roadway segments that are projected fail. The Capital Improvements Element should also identify a funding source for each specific transportation improvement project.

See also the attached comments from the Florida Department of Transportation.

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

*Sufficient*

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

*Sufficient*

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

*Sufficient*

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

*Sufficient*

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

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

*Sufficient.*

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

Sufficient

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

Sufficient

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

Sufficient

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

Sufficient

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

Sufficient

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

Sufficient.

## **APPENDIX A**

### **REVIEW AGENCY COMMENTS**

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



STATE OF FLORIDA  
**DEPARTMENT OF COMMUNITY AFFAIRS**

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

CHARLIE CRIST  
Governor

THOMAS G. PELHAM  
Secretary

**MEMORANDUM**

TO: Mike McDaniel, Chief, Comprehensive Planning  
THROUGH: Bob Dennis, Regional Planning Administrator  
FROM: Paul Darst, reviewing planner  
SUBJECT: Coral Gables adopted revised EAR  
DATE: 14 August 2007  
DECISION: 31 August 2007

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**SUMMARY**

Review of the Coral Gables EAR has been delegated to the South Florida Regional Planning Council. Although the 60-day sufficiency review mail-out deadline is 7 September 2007, the SFRPC has requested that the Department provide comments by 10 August 2007. Staff has, accordingly, accelerated its review.

The original 2nd cycle Coral Gables EAR was reviewed by the SFRPC and determined to be insufficient by the SFRPC on 20 August 2006. The Department provided comments to the SFRPC on 21 June 2006, which identified the following insufficiency issues:

1. The City failed to identify the source of its population estimate and did not include population projections. The EAR did not include a discussion of the infrastructure and land needed to accommodate the projected population growth. This issue was included among the SFRPC's sufficiency issues.
2. The City did not identify the capital improvements projects, with their funding sources, which would be needed to achieve and maintain adopted LOS standards. This issue was included among the SFRPC's sufficiency issues.
3. The City presented no data and analysis on its ability to achieve proper coordination of future land uses and residential development with the capacity and location of public schools. This issue was included among the SFRPC's sufficiency issues.
4. The City did not provide any data and analysis for satisfying the EAR requirement in s. 163.3191(2)(m), F.S, regarding property rights in the coastal high-hazard area.
5. The City did not provide any data and analysis for satisfying the EAR requirement in s. 163.3191(2)(o), F.S, regarding the achievement of the City's concurrency exception policy. This issue was included among the SFRPC's sufficiency issues.
6. The City did not provide any data and analysis for satisfying the EAR requirement in s. 163.3191(2)(p), F.S, regarding the coordination of the City's concurrency management system with other cities and counties. This issue was included among the SFRPC's sufficiency issues.

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The City of Coral Gables adopted the revised EAR through Resolution 2007-151 on 9 July 2007.

Staff has reviewed the revised adopted Coral Gables EAR and has discussed it with staff of the SFRPC and the City of Coral Gables Planning Department. Staff recommends the EAR be evaluated as sufficient.

Staff also recommends that the sufficiency letter to the SFRPC include a request that the City should submit its population projection methodology to the Department for approval, pursuant to Florida Administrative Code Rule 9J-5.005(2)(e)1, prior to the City's submittal of its EAR-based amendment.

## **STAFF ANALYSIS**

Issue 1. *EAR requirement: s. 163.3191(2)(a) Population growth and changes in land area, including annexation, since the adoption of the original plan or the most recent update amendments.*

The Department's analysis stated that the City failed to identify the source of its population estimate and did not include population projections. The EAR did not include a discussion of the infrastructure and land needed to accommodate the projected population growth. The Department recommended that the City—(1) include a population projection through the long-range planning timeframe; and (2) include recommendations to accommodate the projected population through the long-range planning timeframe with respect to land and infrastructure needs.

The City responded by developing its own population projections, which are included in the revised adopted EAR (Volume 1, page 35). The City stated that it developed its own projections, which predict an annual increase of 1.4 percent, because existing projections seemed to underestimate population growth. A local government may develop its own population projections; however, pursuant to Rule 9J-5.005(2)(e), when a local government chooses to prepare its own estimates and projections it must submit estimates and projections and a description of the methodologies utilized to generate the projections and estimates to the Department with its plan when the plan is due for compliance review (unless it has submitted them to the Department for advance review). This rule does not speak to population projections submitted with the EAR; rather it speaks to "compliance review" of plan amendments. The Department has at least two options: (1) we could find the EAR insufficient until the City submits and we approve their population projection methodology; or (2) we can request as part of our EAR sufficiency review or in a separate communication that the City submit its population projection methodology before or at the time of its next plan amendment, especially if it is an amendment that relies on these population projections for its data and analysis.

The City responded to the Department's second recommendation by including new material in the EAR following the description of the new population projections, which states that the City's slow growth will afford opportunity, by means of its concurrency management system, to plan for and respond to the impacts of growth. The EAR also mentions that the City is in the process of developing impact fees to assist in the funding of public infrastructure and services.

Staff recommendation: The new population projections should be accepted for purposes of the EAR, in view of the fact that we did not alert the City in earlier EAR sufficiency reviews that its use of a non-BEBR population projection methodology would need to be approved by us in order for the EAR to be found sufficient; however, we should inform the City that the new projection methodology must be approved by us before it is used to generate population projections which are used in a plan amendment, and in no case later than the EAR-based amendment.

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

The Department's analysis stated that the City did not identify the capital improvements projects, with their funding sources, which would be needed to achieve and maintain adopted LOS standards. The Department provided a number of recommendations related to (1) the City's past performance in trying to maintain its LOS standards and (2) achieving and maintaining LOS standards over the 5- and 10-year planning timeframes.

Chapter 2 of the revised adopted EAR includes a LOS analysis. It states that the City is meeting the sanitary sewer, potable water, solid waste, and storm sewer LOS standards. There is a deficiency for racquetball courts, but this will disappear when the City moves to a service-radius-based LOS standard.

For roads, however, the City has not consistently achieved its LOS standards. The EAR does not offer a retrospective analysis of whether they met the LOS standards for roadways during the EAR review period, as requested by the Department in its previous sufficiency review of the 2006 adopted EAR. Instead, the City provides a 2015 analysis, which shows four failing road segments, all State or County roads and all located outside the City's TCEA.

Staff discussed this point further with City planning staff, which explained that part of their difficulty in providing a retrospective review resulted from the way in which the City's LOS analysis was conducted in the past. Prior analysis simply indicated whether a roadway LOS was below LOS-E, but did not necessarily indicate by how much, which is important in identifying whether that roadway was failing or not. This is because an LOS of E + 20 percent or E + 50 percent (which is really LOS-F) is acceptable in some areas of the City. The four failing roadways in question were all listed at LOS-F in the past, but it is unclear whether they were actually failing at that time. According to the City, these roadway segments are failing now, and because these segments fall outside of the City's TCEA, the concurrency management system prevents new development in these areas which would exacerbate the problem.

The revised EAR, on p. 48 of Volume 1, contains an explanation of what the City can do or is doing to mitigate impacts on the failing roadway segments, such as promoting transit and encouraging mixed-use, pedestrian-oriented design. There is additional discussion of this in Appendix A-2 in Volume 2.

Staff recommendation: The revision satisfies the sufficiency concern.

Issue 3. *EAR s. 163.3191(2)(k) The coordination of the comprehensive plan with existing public schools and those identified in the applicable educational facilities plan adopted pursuant to s. 1013.35. The assessment shall address, where relevant, the success or failure of the coordination of the future land use map and associated planned residential development with public schools and their capacities, as well as the joint decisionmaking processes engaged in by the local government and the school board in regard to establishing appropriate population projections and the planning and siting of public school facilities. For those counties or municipalities that do not have a public schools interlocal agreement or public school facility element, the assessment shall determine whether the local government continues to meet the criteria of s. 163.3177(12). If the county or municipality determines that it no longer meets the criteria, it must adopt appropriate school concurrency goals, objectives, and policies in its plan amendments pursuant to the requirements of the public school facility element, and enter into the existing interlocal agreement required by ss. 163.3177(6)(h)2. and 163.31777 in order to fully participate in the school concurrency system.*

The Department's analysis stated that the City presented no data and analysis on its ability to achieve proper coordination of future land uses and residential development with the capacity and location of public schools.

Coordination of land use and public school planning is discussed in Chapter 2 of the EAR, beginning on p. 49. Several sentences have been added to describe what the City is actually doing in the way of coordination with public schools, mostly to the effect that the City is working with the Miami-Dade County School Board on (1) a revised intra-local agreement pursuant to recent growth management legislation and (2) revised impact-fee standards for educational facilities. Appendix G of the EAR contains data and analysis from the Miami-Dade County School Board related to school overcrowding and facility projects to relieve the overcrowding.

Staff recommendation: The revision satisfies the sufficiency concern.

Issue 4. *EAR s. 163.3191(2)(m) If any of the jurisdiction of the local government is located within the coastal high-hazard area, an evaluation of whether any past reduction in land use density impairs the property rights of current residents when redevelopment occurs, including, but not limited to, redevelopment following a natural disaster. The property rights of current residents shall be balanced with public safety considerations. The local government must identify strategies to address redevelopment feasibility and the property rights of affected residents. These strategies may include the authorization of redevelopment up to the actual built density in existence on the property prior to the natural disaster or redevelopment.*

The Department's analysis stated that the City did not provide any data and analysis for satisfying the EAR requirement in s. 163.3191(2)(m), F.S, regarding property rights in the coastal high-hazard area.

The SFRPC did not include this issue in its review sent to the City, and there does not appear to be anything in the revised adopted EAR addressing the Department's concern on this topic. Only a small portion of the City, comprising stable low-density residential areas, is within the CHHA. According to City planning staff, existing City regulations would allow properties to re-build as they exist now, following a natural disaster, so they believe property-rights issues are unlikely to arise in the portion of the City within the CHHA.

Staff recommendation: This EAR requirement continues to be inadequately treated in the revised Coral Gables EAR; however, staff does not consider this a significant enough failing, given the particular situation of Coral Gables, to warrant an overall evaluation of insufficiency for the revised EAR.

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

The Department's analysis stated that the City did not provide any data and analysis for satisfying the EAR requirement in s. 163.3191(2)(o), F.S, regarding the achievement of the City's exception concurrency policy.

Material supplied with the revised EAR ("Synopsis of Proposed Revisions to the City's 2006 Evaluation and Appraisal Report") states that the Gables Redevelopment Infill District, a TCEA, has been successful in encouraging infill and redevelopment and transit, for which purposes it was created.

Staff recommendation: The revision satisfies the sufficiency concern.

*Issue 6. EAR s. 163.3191(2)(p) An assessment of the extent to which changes are needed to develop a common methodology for measuring impacts on transportation facilities for the purpose of implementing its concurrency management system in coordination with the municipalities and counties, as appropriate pursuant to s. 163.3180(10).*

The Department's analysis stated that the City did not provide any data and analysis for satisfying the EAR requirement in s. 163.3191(2)(p), F.S, regarding the coordination of the City's concurrency management system with other cities and counties.

Staff discussed this issue with City planning staff. City staff pointed out that mitigation of traffic impact was one of the major issues in the EAR and that intergovernmental coordination with surrounding municipalities regarding traffic was a sub-issue under this major issue. Chapter 4 of the EAR has been revised to include additional discussion of mitigating traffic impacts, including some mention of intergovernmental coordination.

Regarding the development of a common methodology for measuring impacts on transportation facilities, City planning staff pointed out that a common methodology is already in use, because Coral Gables and other local governments in Miami-Dade County are using the same methodology, which is provided by the Miami-Dade County Metropolitan Planning Organization.

Staff recommendation: The revision satisfies the sufficiency concern.

Staff also recommends that the sufficiency letter to the SFRPC include a request that the City should submit its population projection methodology to the Department for approval, pursuant to Florida Administrative Code Rule 9J-5.005(2)(e)1, prior to the City's submittal of its EAR-based amendment.

Post-It™ brand fax transmittal memo 7671		# of pages ▶ 2
To Terry Manning	From David Korros	
Co. SFRPC	Co. FDOT D-6	
Dept.	Phone # (305) 470-5840	
Fax # (954) 985-4417	Fax #	



## Florida Department of Transportation

CHARLIE CRIST  
GOVERNOR

District Six  
Office of Director of Transportation Development  
1000 NW 111 Avenue, Miami, FL 33172  
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STEPHANIE C. KOPELOUSOS  
SECRETARY

August 16, 2007

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

**SUBJECT: City of Coral Gables Evaluation and Appraisal Report (EAR) as Revised, June 2007**

Dear Ms. Manning:

In accordance with your request, and the provisions of Chapter 163, Florida Statutes and Chapter 9J-5, Florida Administrative Code, this office has completed a review of the **City of Coral Gables Evaluation and Appraisal Report (EAR)**. The State Roadways within Coral Gables are:

- Red Road/SR 959/SW 57<sup>th</sup> Avenue (from US-1 to SW 8<sup>th</sup> Street)
- US-1/SR 5 (from Red Road to SW 37<sup>th</sup> Avenue)
- Le Jeune Road/SR 953/SW 42<sup>nd</sup> Avenue (from US-1 to SW 8<sup>th</sup> Street)
- Bird Road/SR 976/SW 40<sup>th</sup> Street (from Red Road to SW 40<sup>th</sup> Avenue)
- Tamiami Trail/SR 90/SW 8<sup>th</sup> Street (from SW 37<sup>th</sup> Avenue to Red Road)

The Department offers the following objections, recommendations and comments.

**Objection:**

This revised EAR has provided some general and broad concepts pertaining to mitigating anticipated traffic problems within the city; some general budget information regarding the projected Capital Improvements Element to maintain the City's roadway infrastructure and an Level-of-Service (LOS) table for 2015 showing four roadway segments failing the LOS standards. The Department would like to see this information presented in a way that provides a comprehensive analysis and a detailed, realistic plan on how the budgeted money for the next five years will be used to address the traffic issues within the City. The City should prepare a Transportation Master Plan which develops mitigation measures that are specific to the roadway segments that are projected to fail the LOS standards. The Capital Improvements Program should provide a detailed list of projects that would implement the mitigation measures for the

specific roadway segments that are projected to fail. The Capital Improvements Element should also identify a funding source for each specific transportation improvement project.

**Recommendation:**

FDOT recommends that the City include a policy stating that the City will prepare a Transportation Master Plan within one year from the adopted EAR-Based Amendments to the Comprehensive Plan. Specifically, the City shall undertake a Transportation Master Plan to identify projects, as well as short and long term multimodal and policy oriented mitigation measures. The Transportation Master Plan should include monitoring measures which reflect measurable goals for the GRID, such as a goal that states a percentage of vehicle miles traveled (VMT) reductions, even while providing for an increase in person trips. Each project shall have an associated estimated cost to assist in determining a financially feasible Capital Improvement Element. The projects identified in the approved Transportation Master Plan shall be implemented as needed to achieve and maintain the adopted Level-of-Service standards. These projects will be the basis of the Capital Improvements Element relative to transportation.

Due to the fact that this is the Revised EAR, the Department will look for this policy in the EAR-Based Amendments to the Comprehensive Plan.

**Comment:**

The Transportation Element should include at least one objective which provides for the protection of existing and future right-of-way from building encroachment on State Roadways.

Please contact Phil Steinmiller at 305-470-5825 if you have any questions concerning our response.

Sincerely,



Alice Bravo, P.E.  
District Director of Transportation Systems Development

Cc: Phil Steinmiller