



13-A

## MEMORANDUM

### TOWN OF PONCE INLET, PLANNING AND DEVELOPMENT DEPARTMENT

*We strive to be professional, caring and fair*

To: Jeaneen Witt, Town Manager  
Through: Aref Joulani, Planning & Development Director *AS*  
From: Michael E. Disher, AICP, Senior Planner  
Date: September 4, 2015  
Subject: 2015 Evaluation and Appraisal of the Comprehensive Plan

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**MEETING DATE:** September 17, 2015

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#### **Introduction**

The purpose of this memo is to provide an update on changes to the state requirements for the evaluation and appraisal of local government comprehensive plans, as well as the Town's progress toward evaluating its own comprehensive plan.

#### **Overview**

Local governments are required by State Law to review their comprehensive plans every seven years<sup>1</sup>. The purpose of this review is to determine if plan amendments are necessary to reflect changes in state statutes since the last update. This process, historically known as the Evaluation and Appraisal Report (EAR), used to involve an analysis of major state-mandated concerns as well as local planning issues. It also included an in-depth assessment of the effectiveness of each goal, objective, and policy, and a description of necessary plan amendments needed to address these issues over the next planning period. The EAR process required multiple public hearings and workshops. The last major review of the Ponce Inlet Comprehensive Plan occurred in 2008-2010.

In 2011, the scope of the EAR process was changed significantly with the adoption of the Community Planning Act. The act repealed much of the "top-down" state rules, mandates, and oversight of local planning decisions, such as those in Rule 9J-5 of the Florida Administrative Code (FAC). It also shifted many planning mandates to the local level, such as concurrency<sup>2</sup> for transportation, schools, and recreation. It was accompanied by a significant reorganization of state departments and agencies involved with planning and development. These efforts were geared toward improving the state economy by removing regulatory barriers, procedures, and time constraints affecting development. In the process, it also granted local governments more flexibility – and responsibility – toward meeting the statutes. The State's role was reduced to focus on issues related to state-wide concerns, facilities, and resources.

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<sup>1</sup> F.S. 163.3191

<sup>2</sup> Pursuant to F.S. 163.3180, concurrency is the requirement that public facilities needed to serve new development shall be in place and available by the time they are needed, which is no later than the issuance a certificate of occupancy or its functional equivalent.

The new “Evaluation and Appraisal” process no longer requires the in-depth report to be reviewed by the State. Instead, it is now up to local governments to determine the changes necessary for its plan to comply the latest state laws. Instead of being transmitted to the State by resolution, local governments now send a “Notification Letter” listing the necessary changes. Local governments are also encouraged, rather than required, to identify changes to local conditions such as population growth, development, and other factors that affect the long-term planning of the community.

The local government is required to notify the DEO of its findings by the established notification date for that jurisdiction. The local government then has one year after the notification letter is sent to adopt the EAR-based amendments, utilizing the same process as a large-scale comprehensive plan amendment. If either of these deadlines is missed, the local government is prohibited from adopting other comprehensive plan amendments until the requirement is met. A copy of the statute governing this process is provided with this report (see **Attachment A**). A comparison of the differences between the former EAR process with the new Notification Letter process is provided as **Attachment B**.

### **Discussion**

The Notification Letter deadline for Ponce Inlet is November 1, 2015. Beginning this past February, Staff has been reviewing the changes to state growth managements laws with the Planning Board (see summary, **Attachment C**). The most significant of these changes affecting Ponce Inlet are discussed below:

#### *Concurrency*

The 2011 Community Planning Act is most noted for repealing the state mandate for transportation, recreation, and school concurrency, shifting the option and responsibility to the local government level. The state mandate for public utilities, solid waste, stormwater, and aquifer recharge concurrency remains. Each local government now has the ability to decide whether to maintain level-of-service standards for its roads, parks, and schools. Those that do must still meet certain state standards. Those that do not are still encouraged, but not required, to replace their standards with other policies and funding mechanism to ensure that these types of facilities and services can be met if needed. The Town will need to make this determination from a policy standpoint whether to continue or repeal the locally mandated types of concurrency.

#### *Coastal High Hazard Area (CHHA)*<sup>3</sup>

State regulations regarding comprehensive planning in coastal areas have changed over the past ten years. Before 2006, comprehensive plans were required by FAC Rule 9J-5.012 to “Direct population concentrations away from known or predicted coastal high-hazard areas.” The Town’s policies prohibiting any increases in residential density (not just in the CHHA) are intended to comply with this rule<sup>4</sup>. In 2006, the provisions under Florida Statutes Ch. 163.3178(8) were created allowing local governments to meet Rule 9J-5.012 if new development did not negatively impact hurricane evacuation times or if the development mitigated such impacts through new shelter space, donations of land or funds to build shelters, etc. In 2011, the

<sup>3</sup> Per F.S. 163.3178(2)(h), defined as, “the area below the elevation of the category 1 storm surge line as established by a Sea, Lake, and Overland Surges from Hurricanes (SLOSH) computerized storm surge model.”

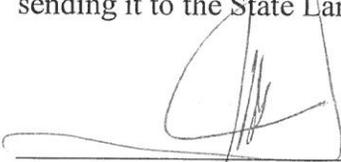
<sup>4</sup> See Future Land Use Element Policy 1.1.4, Objective 1.4 and Policy 1.4.1, and Coastal Zone Element Policy 1.4.1.

Community Planning Act repealed 9J-5 altogether, and with it the prohibition on plan policies allowing additional population in the CHHA. Local government comprehensive plans must still contain data, analysis and policies guiding protection and development in the CHHA<sup>5</sup>. In the 2015 legislative session, these requirements were expanded regarding redevelopment policies in the CHHA. Pursuant to F.S. 163.3178(f), the Coastal Zone Element must contain, a redevelopment component that must be used to eliminate “inappropriate and unsafe development in coastal areas as opportunities arise,” including policies to reduce flood risk from impacts of sea-level rise, removal of properties from flood zones, implement development techniques to reduce flooding losses and claims, and apply construction requirements “consistent or more stringent than” those of the Florida Building Code. As a whole, these statutes are focused on protecting the natural coastal environment, maintaining evacuation times, and minimizing property risk and loss, while still allowing limited appropriate development.

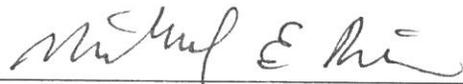
The Town will need to review its policies to determine if the current prohibition on density increases is still valid in light of these changes, and update its policies to ensure that development and redevelopment occur with minimal risk to property and the coastal environment.

**Conclusion**

The DRAFT Notification Letter is provided as **Attachment D**. Staff will finalize the letter for presentation to the Planning Board in September and the Town Council in October before sending it to the State Land Planning Agency.

  
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Aref Joulani, Planning & Development Director

September 4, 2015  
Date

  
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Michael E. Disher, AICP, Senior Planner

September 4, 2015  
Date

Attachments

- A. F.S. 163.3191
- B. Comparison of EAR vs. Notification Letter
- C. Summary of Growth Management Law Changes 2008-2015
- D. DRAFT Notification Letter

<sup>5</sup> F.S. Ch. 163.3177(6)(g) and 163.3178.

## ATTACHMENT A

### **163.3191 Evaluation and appraisal of comprehensive plan.—**

(1) At least once every 7 years, each local government shall evaluate its comprehensive plan to determine if plan amendments are necessary to reflect changes in state requirements in this part since the last update of the comprehensive plan, and notify the state land planning agency as to its determination.

(2) If the local government determines amendments to its comprehensive plan are necessary to reflect changes in state requirements, the local government shall prepare and transmit within 1 year such plan amendment or amendments for review pursuant to s. 163.3184.

(3) Local governments are encouraged to comprehensively evaluate and, as necessary, update comprehensive plans to reflect changes in local conditions. Plan amendments transmitted pursuant to this section shall be reviewed pursuant to s. 163.3184(4).

(4) If a local government fails to submit its letter prescribed by subsection (1) or update its plan pursuant to subsection (2), it may not amend its comprehensive plan until such time as it complies with this section.

(5) The state land planning agency may not adopt rules to implement this section, other than procedural rules or a schedule indicating when local governments must comply with the requirements of this section.

## ATTACHMENT B

### COMPARISON OF COMPREHENSIVE PLAN EVALUATIONS AND APPRAISALS BEFORE AND AFTER THE 2011 COMMUNITY PLANNING ACT

Before:

- A *Report* has to be prepared every 7 years by a specific date set by rule.
- A *Report* had to address 16 subjects and make appropriate statements related to them.
- The Report had to be prepared by the Local Planning Agency (LPA) and recommended after a public hearing with public notice.
- Statute was very detailed about the format and contents of the Report (i.e., table of contents, numbered pages, etc.).
- Department of Community Affairs (DCA) could be asked to perform a review of the EAR prior to adoption.
- Local governments could conduct voluntary scoping meetings.
- EAR adopted by the local governing body by ordinance/resolution after a noticed public hearing.
- DCA would provide a preliminary sufficiency determination.
- Local governing body would adopt EAR-based amendments within 18 months after Report is deemed sufficient by DCA.
- If EAR or EAR-based amendments not submitted by the deadline, DCA could grant one or more extensions.
- Sanctions for failure to submit amendments could be imposed after an administrative proceeding.

After:

- A *Notification letter* has to be sent by the *local government* (not the local governing body) to Department of Economic Opportunity (DEO) by a specific date set by Rule stating whether the Plan needs to be amended to reflect changes in the Community Planning Act since the last update.
- If Plan amendments are determined by the local government to be necessary, the local government must transmit plan amendments to DEO within one year of such determination.
- If plan amendments are necessary, local government must follow the State-coordinated review process.
- If local government does not submit its Letter or adopt necessary amendments, it cannot amend its Plan in future.
- Local governments are encouraged to comprehensively evaluate and update their plans to reflect changes in local conditions.

## ATTACHMENT C

### Florida Growth Management Legislative Changes 2008-2015

#### 2008

Changes to the Growth Management Act in 2008 included requirements that future land use plans not only discourage sprawl, but also be based on energy-efficient land use patterns and greenhouse gas reduction strategies. Transportation, housing, and conservation elements were required to address renewable energy resources, energy efficiency, and energy conservation. These requirements were put in place at a time when the nation was experiencing \$4/gallon gasoline prices and the first impacts of the "Great Recession."

#### 2009

This year saw the dawning recognition that transportation concurrency was simply not possible to achieve in dense urban land areas, such as urban downtowns or other areas with a certain population density, and that it had the unintended consequence of encouraging, rather than preventing sprawl. The existing built environment in dense areas makes additional road widenings virtually impossible from a fiscal standpoint. And even if the roads could be widened, it would unfavorably change the character of those places and render the roads inhospitable to pedestrians and other modes of travel. Development investors were also unintentionally incentivized to seek locations far from urban centers where sufficient capacity existed and road widening would not be necessary.

Local governments that year were thus given authority to create Transportation Concurrency Exception Areas (TCEAs), areas designated in the comprehensive plan that by virtue of population density and gridded street network, could support alternative means for people to get around other than the automobile. Such areas could adopt level-of-service standards to support overall mobility of people, rather than focusing exclusively on the automobile. Local jurisdictions could even replace transportation impact fees in the TCEAs with "mobility fees," to fund sidewalk expansions, "road diets," bikepaths, bus shelters, etc.

In reaction to the economic recession, the Legislature also granted two-year extensions to permits and development orders that were to expire between 2010-2011. Eligible permit holders had to first request the extension in writing from the local government or agency.

#### 2010

Relatively minor changes were made to the statutes, mostly deleting provisions that were by that time obsolete, and which did not affect substantive comprehensive planning requirements. The two-year extension for development orders and permits was also renewed.

#### 2011

In 2011 Florida's growth management legislation was significantly rewritten. This was coupled with a major reorganization of state departments, most notably the Department of Community Affairs, and with it much of the "top-down" state oversight of local planning decisions. The State's role was reduced to focus on issues related to state-wide concerns, facilities, and resources. Known as the "Community Planning Act," this legislation included the following:

### Comprehensive Plan Requirements

- Repealed Florida Administrative Code Rule 9J-5, which contained many of the detailed requirements for comprehensive plans to implement the laws of F.S. 163. Some of these rules were moved directly into the statutes themselves.
- Repealed state-mandated concurrency requirements for transportation (including 2009 TCEA option), public schools, and recreation. However, local governments are allowed to keep these provisions if they choose to do so. The state mandates for potable water, sanitary sewer, solid waste, stormwater management, water supply, and groundwater aquifer recharge remain.
- Proportionate fair-share mitigation is clarified to exempt developers from paying more than their fair-share to correct deficiencies on backlogged facilities.
- Effectively repealed criterion of future land use amendments to show a “demonstrated need.”
- Repealed financial feasibility requirement for capital improvement plans.
- Deleted language encouraging local governments to undergo a future visioning process and adopt a vision statement regarding their future growth and character.
- EAR requirements were revised to those used now. Requirements to analyze state-mandated major issues, special topics, and plan successes were repealed.
- Created option for local governments to designate “adaptation action areas” in low-lying coastal zones subject to flooding from extreme high tides, storm surge, and sea-level rise.
- Removed 2008 provisions related to greenhouse gas reduction.

### Comprehensive Plan Process

- Streamlined the large-scale amendment review process, now called the “expedited state review process,” reducing the time frame for amendment approval by approximately 2.5 months. Also removed the twice-per-year limit on large-scale amendments.
- Created a “state coordinated review process,” similar to the former large-scale amendment review process, but applicable only to issues of special state interest or critical state concern.
- Limited state agency review comments of local plan amendments to issues adversely affecting important state resources or facilities.
- Prohibited local referendum processes for development orders or local plan amendments, such as would have been authorized through “Hometown Democracy/Amendment 1” the previous year.
- Required local governments to review related applications for comprehensive plan amendments and rezoning on the same property together at the same time, rather than sequentially.

### Developments of Regional Impact (DRIs)

- Reduced the number and type of developments that must be reviewed through this process.

### Extensions

- Granted two-year extensions to permits and development orders that were to expire between 2012-2014, not to be used in combination with previous extensions to exceed a

total of four years. Note: This extension has also been renewed the past two years, and a bill has been filed in the 2015 Legislative session to renew it for a sixth time.

## **2012**

The changes to growth management legislation in 2012 were largely intended to clarify the wording, meaning, purpose, or implementation of the sweeping changes adopted in 2011.

- “Grandfathered” referendum processes in local government charters for development orders or local plan amendments that existed as of June 1, 2011.
- Changed focus of analysis for required for future land use map amendments, from amount of land needed for growth determined by the local government, to the amount needed to achieve statutory requirements.
- Clarified the state and local review process for amendments rescinding concurrency.
- Allowed individual local governments in a school district to retain school concurrency even if other jurisdictions in that district do not.
- Clarified and adjusted the timeframes involved in processing comprehensive plan amendments through the expedited review process and state coordinated review process.

## **2013**

The most significant growth management changes in 2013 related to the creation of a new incentive program for manufacturing. The program was intended to empower local governments to create incentives, streamline development review, provide supporting infrastructure, and clarify roles of state and local agencies in attracting significant manufacturing facilities to the state. The “manufacturing development program” is a type of economic incentive similar to the “working waterfronts” program created by the state in 2005 and later adopted by the Town.

The Legislature that year also adopted the following provisions:

- Clarified and further limited “grandfathering” of local referendum processes for comprehensive plan amendments that existed in local charters as of June 1, 2011 to those including more than five parcels of land; explicitly prohibited such processes for development permits; and declared such processes that were adopted after June 1, 2011 to be null and void, effective retroactively.
- Created new transportation policy requirements for local governments that choose to repeal transportation concurrency, and encouraged adoption of mobility funding systems as an alternative to impact fees.
- Granted two-year extensions to permits and development orders that were to expire between 2013-2015, not to be used in combination with previous extensions to exceed a total of four years.

## **2014**

Minor changes were made regarding comprehensive plan implementation timeframes, new provisions for fuel terminals, and an additional two-year extension for permits and development orders.

## **2015**

- Added requirements to the redevelopment component of the Coastal Management Element to reduce risks from sea-level rise and to be consistent with or more stringent than the Florida Building Code and federal flood plain management regulations.

- Added requirements that local governments must cooperate with other governments and utilities that provide services within its jurisdiction.
  - Modified responsibility for regional planning councils and procedures for processing amendments to sector plans.
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# Town of Ponce Inlet



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November 1, 2015

Florida Department of Economic Opportunity  
Division of Community Planning and Development  
ATTN: Ray Eubanks,  
Plan Processing Administrator  
107 East Madison Street, Caldwell Building, MSC 160  
Tallahassee, Florida 32399

## Re: Town of Ponce Inlet Evaluation and Appraisal Notification Letter

Dear Mr. Eubanks:

Florida Statutes § 163.3191 requires the Town of Ponce Inlet to periodically review its Comprehensive Plan and determine whether plan amendments are necessary to reflect changes in state law requirements. Florida Administrative Code Rule 73C-49.002 requires the Town to conduct the first such review since the 2011 adoption of the Community Planning Act by November 15, 2015.

The Town has conducted this review and determined that changes to the Comprehensive Plan are necessary to reflect changes in state law. The Town provides this letter to notify the state land planning agency of this determination, to identify plan amendments necessary to reflect changes in state law and to identify other necessary plan amendments. Please note that the Town may adopt Comprehensive Plan amendments that are different from those identified here after holding public hearings on proposed amendments.

The Town of Ponce Inlet's evaluation has identified the following necessary changes:

### I. General

- A. For consistency with F.S. § 163.3161(1), update all references to comprehensive planning legislation to "Community Planning Act."
- B. Update data and analysis in the comprehensive plan with a focus on the data the Community Planning Act requires.
- C. Update all elements to include capital project development based on 5-year and 20-year needs.
- D. Delete references to repealed Rule 9J-5, Florida Administrative Code. Revise citations to reference Chapter 163, Florida Statutes where appropriate.
- E. Adopted levels of service and the concurrency management system appear in multiple elements. Determine if the Town wishes to continue concurrency programs for transportation

*The Town of Ponce Inlet staff shall be professional, caring, and fair in delivering community excellence while ensuring Ponce Inlet citizens the greatest value for their dollar.*

and recreation through its comprehensive plan. Review all levels of service references to ensure consistency. Ensure the concurrency management system and proportionate share methodology is consistent within the Comprehensive Plan and between the Comprehensive Plan and the Land Development Code.

- F. To comply with F.S. § 163.3177(1)(f)3, amend the comprehensive plan to be based upon permanent and seasonal population estimates and projections, which shall either be those published by the Office of Economic and Demographic Research or generated by the local government based upon a professionally acceptable methodology. The plan must be based on at least the minimum amount of land required to accommodate the medium projections as published by the Office of Economic and Demographic Research for at least a 10-year planning period unless otherwise limited under F.S. 380.05 – Areas of Critical State Concern.
- G. To comply with F.S. § 163.3177(5)(a), revise plans to include five-year and 20-year planning periods.
- H. For consistency with F.S. § 163.3204, change references to the “Department of Community Affairs” to “state land planning agency.”
- I. Revise all objectives as necessary to incorporate measurable targets.
- J. Throughout the plan revise or delete outmoded dates established to measure the accomplishment of goals and objectives.
- K. To avoid regulatory duplication via the plan, revise or delete language with a high degree of regulatory specificity that may be better implemented in the land development regulations.
- L. Throughout the plan, update names of departments and key staff positions to reflect departmental reorganizations since the last plan update.
- M. Update references to local and regional agencies throughout the plan.

## **II. Administration**

- A. Update Chapter I, Administration, to include new statutory references and changes to plan amendment procedures per the 2011 Community Planning Act.

## **III. Future Land Use Element**

- A. To comply with F.S. § 163.3177(6)(a), amend Policy 1.2.2 to clarify that density figures refer to the *gross* acreage of land.
- B. To comply with F.S. § 163.3177(6)(a)4, review and update the future land use map if necessary to ensure that it can accommodate at least the minimum amount of land required for the medium projections of the Office of Economic and Demographic Research for at least a 10-year planning period unless otherwise limited under F.S. 380.05 – Areas of Critical State Concern.
- C. To comply with F.S. § 163.3177(6)(a)9, amend the Future Land Use Element to discourage the proliferation of urban sprawl, as redefined in the 2011 Community Planning Act.
- D. To comply with F.S. § 163.3177(6)(a)10.b.(I), amend Future Land Use Map series to identify the designated “Ponce Park Historic Area.” Additionally identify any significant historic

properties worthy of greater protection.

- E. To comply with F.S. § 163.3178(2)(h) and (8)(a), amend Policy 1.2.2(g), Policy 1.1.4, Objective 1.4 and Policy 1.4.1 to establish appropriate densities and mitigation for development in the Coastal High Hazard Area, rather than outright prohibition.
- F. To comply with F.S. § 163.3178(8)(c), amend the Future Land Use Map to show the Coastal High Hazard Area.

#### **IV. Transportation Element**

- A. Because the Town of Ponce Inlet is within the metropolitan planning area of the River-to-Sea (Volusia-Flagler) Transportation Planning Organization, amend the Transportation Element to be consistent with the requirements of F.S. § 163.3177(6)(b) including adding policies if necessary to address the requirements of F.S. § 163.3177(6)(b)l-2.
- B. If the City chooses to maintain a transportation concurrency program, amend Transportation Element and other applicable elements to maintain compliance with F.S. § 163.3180(5)(h) [Concurrency].
- C. To establish compliance with F.S. § 163.3177(6)(b), update the plan to add policies regarding mobility, walkability, public transportation, and multi-modal systems. Update maps to incorporate recommended improvements from the Ponce Inlet Bicycle-Pedestrian plan.
- D. Review the transportation system's capability to evacuate the population before an impending natural disaster, pursuant to F.S. § 163.3177(6)(b)2.c.
- E. References to the Volusia County "MPO" need to be revised to "TPO."
- F. Pursuant to F.S. § 163.3180(5)(g), provide for use of common LOS and concurrency methodologies, such as the uniform traffic impact analysis methodology created through the TPO.
- G. If the Town maintains transportation concurrency, add a policy under Objective 1.1 exempting public transit from concurrency, pursuant to F.S. § 163.3180(5)(h),
- H. To comply with F.S. § 163.3180(5)(h)2.a, update policy 1.7.3 to reference proportionate fair-share and methodology and credits due for any additional impact fees paid per F.S. § 163.3180(5)(h)2.e.
- I. Update cross-references to the concurrency chapter in the LUDC in all policies as applicable.

#### **V. Housing Element**

- A. To comply with F.S. § 163.3177(6)(f) ensure that applicable 2011 requirements from repealed Rule 9J-5 remain in the plan.

#### **VI. Public Facilities Element**

- A. To comply with F.S. § 163.3177(6)(c), update relevant data and analyses regarding facilities providing service within the Town's jurisdiction, along with planned capital projects.
- B. To comply with F.S. § 163.3177(6)(c), update to include latest regional water supply plan

data, and both traditional and alternative supply projects if applicable.

- C. To comply with F.S. § 163.3177(6)(c) ensure that selected 2011 requirements from repealed Rule 9J-5 remain in the plan.
- D. To comply with F.S. § 163.3180(2-3) Potable water and sewer – change LOS to refer to standards set by Port Orange, since the Town cannot set LOS standards for services provided by another jurisdiction.

## **VII. Coastal Management Element and Conservation Element**

- A. Review policies for compliance with F.S. § 163.3177(6)(d)1. Also address factors that affect energy conservation.
- B. To comply with F.S. § 163.3177(6)(g), update the coastal zone management data, principles, guidelines, standards, and strategies pursuant to F.S. § 163.3178(2) and (3). Include policies that limit public expenditures that subsidize development in coastal high-hazard areas and protect human life against the effects of natural disasters.
- C. To comply with F.S. § 163.3178(2)(d), update plan to include latest Division of Emergency Mgmt. regional hurricane evacuation study data.
- D. Pursuant to F.S. § 163.3178(2)(f), address redevelopment in coastal areas, outlining the principles and strategies to eliminate inappropriate and unsafe development when opportunities arise.
- E. To comply with F.S. § 163.3178(2)(j), update policies to identify regulatory and management techniques to mitigate the threat to human life and to control proposed development and redevelopment in order to protect the coastal environment and give consideration to cumulative impacts.
- F. Update Policy 1.4.1 to reflect F.S. § 163.3178(8)(a), regarding review of comprehensive plan amendments in the CHHA and appropriate mitigation for impacts to hurricane evacuation.

## **VIII. Recreation and Open Space Element**

- A. Given that the amount of open space and parkland in Town far exceeds the level-of-service standard, evaluate whether the LOS standard is still needed, or should be modified to reflect updated needs and preferences, per F.S. § 163.3180(1)(a).

## **IX. Intergovernmental Coordination Element**

- A. To comply with F.S. § 163.3177(6)(h)1.b. include a dispute resolution process as prescribed in section F.S. § 186.509.
- B. To comply with F.S. § 163.3180(5)(g), address coordination with TPO policies and agreements, such as the uniform traffic impact analysis methodology.
- C. To comply with F.S. § 163.3177(4), assess the extent to which Ponce Inlet continues to meet the criteria for exemption of a school interlocal agreement under subsection F.S. § 163.3177(1) and (2).

**X. Capital Improvements Element**

- A. To comply with F.S. § 163.3177(3)(a), update capital improvements schedule for the next 5-year planning period, including transportation improvements in the TPO improvement program and long-range transportation plan.
- B. Review Objective 1.5 and Policies 1.5.1-1.5.3 for consistency with F.S. § 163.3178 regarding public expenditures in the CHHA.

The Town looks forward to developing the 2016 comprehensive plan update into a concise and meaningful statement of intent. If you have any questions, please do not hesitate to contact this office.

Sincerely,

Aref Joulani  
Planning & Development Director