

III. COMMENTS

**State Report of Findings and Recommendations for the
Treasure Coast Regional Planning Councils Strategic Regional
Policy Plan, October 23, 1995**

EXECUTIVE OFFICE OF THE GOVERNOR

**STATE REPORT OF FINDINGS AND RECOMMENDATIONS
FOR THE
TREASURE COAST REGIONAL PLANNING COUNCIL'S
STRATEGIC REGIONAL POLICY PLAN
OCTOBER 23, 1995**

INTRODUCTION

The *State Report of Findings and Recommendations for the Treasure Coast Regional Planning Council's Strategic Regional Policy Plan* has been prepared in accordance with sections 186.507 and 508, Florida Statutes, and Rule 27E-5, Florida Administrative Code.

This report identifies the significant findings and recommendations compiled from the review comments received from state and regional agencies and other entities. It sets forth findings that identify concerns with the Treasure Coast Regional Planning Council's (TCRPC's) proposed strategic regional policy plan (SRPP). Additionally, it includes specific recommendations for each finding necessary to make the plan consistent with the State Comprehensive Plan (SCP), Chapter 186, Florida Statutes, Rule 27E-5, Florida Administrative Code, and other pertinent state regulations. The report and the reviewing agencies' comments are provided to assist the TCRPC in its continuing development and improvement of the region's plan.

A copy of the *State Report of Findings and Recommendations for the Treasure Coast Regional Planning Council's Strategic Regional Policy Plan* shall be included in the adopted plan in a comment section, pursuant to section 186.508, Florida Statutes. By attachment, the TCRPC may indicate where recommended revisions have been incorporated into the region's plan.

FINDINGS AND RECOMMENDATIONS

1. Finding:

Other state and regional reviewers have provided the Governor's Office of Planning and Budgeting (OPB) with critical and important review comments regarding the proposed SRPP.

Copies of all comments submitted to the Governor's Office regarding the TCRPC's proposed SRPP are incorporated herein for the Council's consideration and use.

Recommendation:

Comments provided by OPB and other state and regional reviewers, particularly critical and other important comments provided by the Departments of Transportation, Community Affairs, Environmental Protection, State, Health and Rehabilitative Services, Florida Game and Fresh Water Fish Commission, South Florida Water Management District, St. Johns River Water Management District, other regional organizations, and other reviewers and particularly local governments are to be used to finalize the SRPP for rulemaking and to help develop the TCRPC's future work plan for continuing to amend the region's plan. As the TCRPC continues to develop its region's SRPP, it should ensure the plan is compatible with and furthers the SCP.

TCRPC Response: Council has paid particular attention to review comments relative to consistency with the State Comprehensive Plan. Revisions to the proposed plan have been made, when appropriate, to address those comments. Council recognizes that several comments are particularly meaningful for a future work plan, such as the FDOT comment regarding a determination of the future needs for transit in the Region.

2. Finding:

The state's review and analysis was enhanced by the meeting with the TCRPC's acting executive director, staff and representatives of state and regional agencies on October 10, 1995, to discuss comments, questions and concerns regarding the proposed plan. It was reassuring to learn that the TCRPC is committed to amending and improving the SRPP for the Treasure Coast region.

Recommendation:

As discussed in the October 10, 1995 meeting, the RPC may wish to pursue implementing a SRPP amendment process similar to the local government comprehensive plan amendment process, i.e., twice annually. Such a process would facilitate incorporation of meaningful regional guidance from new legislation and the findings and recommendations of other planning activities and programs currently in progress, such as revisions to the SCP, the metropolitan planning organization (MPO) long-range plans, Sustainable South Florida and Florida Greenways. Pertinent regional guidance from such programs should be incorporated into the Treasure Coast region's SRPP.

TCRPC Response: Council has been guided in the preparation of the SRPP by the plans and program of the Metropolitan Planning Organizations, Sustainable South Florida, Florida Greenways, etc. The Forward section of the SRPP presents Council's strategy for future amendments to the SRPP, based on new information or issues which may become more critical or more current. At this time, however, it is not recommended that Council establish a formal schedule under which SRPP will be amended.

3. Finding:

As presented to OPB, the proposed maps of natural resources of regional significance (NRRS) are not consistent with section 186.507(11), Florida Statutes, and Rule 27E-5.004(3)(a), Florida Administrative Code, because:

they do not identify natural resources (e.g., Hutchinson Island and COBRA areas) by specific geographic location;
the maps and the list of the NRRS do not identify the same resources;
the maps are incorrectly titled as required by rule and statute; and
the maps do not identify, and the plan does not address endangered, threatened or species of special concern on the list and maps of NRRS.

Recommendation:

The NRRS maps must be amended to specifically identify natural resources of regional significance by geographic location. The *Natural Resources of Regional Significance* section contains a list of *Significant Regional Resources*. The NRRSs contained on this list must be reconciled with the NRRS map. Also, the title of the NRRS maps must include the phrase: *Natural Resources of Regional Significance*, pursuant to Rule 27E-5.004(3)(a), Florida Administrative Code.

TCRPC Response: Council will identify all natural resources of regional significance on the map series, as required in the Florida Statutes and Florida Administrative Code. Due to logistical complications, the map series was incomplete at the time of submission of the proposed SRPP. Natural resources will be identified by specific geographic location. The title of all maps in the series will be changed to “Natural Resources of Regional Significance”. The natural resources on the list of Natural Resources of Regional Significance will be reconciled with the map series.

4. Finding:

The SRPP does not include regional goal *indicators* as required by Rule 27E-5.004(6), Florida Administrative Code. Indicators are to include baseline data and information against which progress can be measured in the region’s five year evaluation and appraisal report.

Recommendation:

The proposed SRPP must be revised to include goal *indicators* for each regional goal.

TCRPC Response: Consistent with Rule 27E-5.004(6), the final SRPP will contain one or more regional indicators for each goal.

5. Finding:

The list of *Resources and Facilities of Regional Significance* contained in the *Education* section identifies all public schools as being “regionally significant.” However, it is unclear as to how every public school is significant to the “region” and how the designation of a public school as a regional facility will be interpreted with regard to the proposed Intergovernmental Coordination Element Rule.

Recommendation:

The trends and conditions that set up the *Resources and Facilities of Regional Significance* list contained in the *Education* section must be revised to explain how public schools are a resource and facility of regional significance and how the designation of a public school as a regional facility will be interpreted with regard to the proposed Intergovernmental Coordination Element Rule.

TCRPC Response: The text containing trends and conditions will be revised to explain why all schools are considered to be facilities of regional significance. The list of resources and facilities will be changed to indicate that educational systems as a whole are the true resources of regional significance. While individual components of the system may not be regionally significant by themselves, each is an important component of the system. It would be purely speculative at this point to suggest how interpretations might be made regarding a proposed Intergovernmental Coordination Element Rule. No draft rule has been distributed. Council suggests that a local government would be unlikely to approve development which had potentially negative impacts on educational facilities.

6. Finding:

The significant regional resources and facilities listed within the *Emergency Preparedness* section are too broad and are not consistent with the criteria provide in Rule 27E-5.002(7), Florida Administrative Code. For example, the *Significant Regional Resources and Facilities* list includes all educational facilities (public and private) located within the region. Not every public school is an adequate evacuation shelter (e.g., public schools that may be located within coastal high hazard areas).

Recommendation:

The proposed list of *Significant Regional Resources and Facilities* list within the *Emergency Preparedness* section must be revised to be consistent with the criteria set forth in Rule 27E-5.002(7), Florida Administrative Code.

TCRPC Response: The list of Significant Regional Resources and Facilities has been revised, as suggested. A number of items have been removed from the list and a number have been added. Educational facilities have been removed from

the list; public and private emergency shelters designated by the American Red Cross have been added.

7. Finding:

As written, the *Emergency Preparedness* section," does not discuss the region's evacuation times or evacuation routes.

Recommendation:

The *Emergency Preparedness* section must be expanded to incorporate data and information, by county, on evacuation times and designated routes and to provide guidance for the region to maintain or improve these times and routes.

TCRPC Response: A new section has been added to the text entitled "Road Network, Evacuation and Clearance Times". In addition, a complete listing of evacuation clearance times in the Treasure Coast Region, by county and storm severity, have been included in an Appendix.

8. Finding:

Some policies and/or the associated TCSs do not identify the ways in which programs and activities are to be conducted to achieve the region's goals. The use of such terms as "should," "encourage," "promote," and "address" do not provide clear guidance or direction to the region's citizens and local governments, particularly for other governmental entities to ensure consistency with the SRPP and the SCP. The following are example policies/strategies which do not adequately identify how the region intends to achieve its goals: Strategy 1.1.2, Policies 1.1.2.1 and 1.1.2.2 (page II-41); Policies 5.1.1.2, 5.1.1.3, 5.1.1.4, 5.1.1.5 (page II-79); Strategy 6.1.1 (page II-80); Policy 2.2.3.1 (page 2-29); Strategy 5.1.2, 5.1.2.1, 5.1.2.2 (page 5-31); and Strategy 5.4.1, (page 5-36).

Recommendation:

To ensure consistency with the SCP and Rule 27E-5, Florida Administrative Code, the proposed SRPP must be amended to delete the use of such terms in order to provide clear guidance to governmental entities and the citizens of the Treasure Coast region. An example of how Policy 5.1.1.2 (page II-79) could be rewritten to provide clear, specific guidance is:

Redevelop obsolete retail/commercial centers located within well-developed urban areas as an effort to discourage urban sprawl and co-locate services for surrounding urban area. Proposals for redevelopment may include the following site design features:

- A. *Design a network of streets that connect and enhance the establishment of adjacent neighborhoods.*

- B. *Include a mix of land uses that complements the existing activities of the city, town or village.*

TCRPC Response: All policies and strategies have been reviewed to determine if appropriate language is used which will identify ways in which programs and activities are to be conducted. Appropriate revisions have been made.

9. Finding:

The “vision” identified in the proposed SRPP appears to focus on a significant policy change for the region in that the vision focuses on preferred development/site specific criteria. Although the “vision” is not inconsistent with the SCP, the plan does not justify or describe the reason for the RPC’s vision. Specifically, the proposed plan does not answer the following questions:

How was the vision developed?

What is the “regional” basis or buy-in for the “vision’s” preferred development/site specific criteria?

What role did the region’s local governments and citizens play in the development of SRPP and specifically the vision.

It is a concern to the state that the SRPP may be prescribing changes which may not have included the participation of local governments. Therefore, local governments cannot or may be unwilling to adopt the preferred development/site specific criteria into their local government comprehensive plans.

Recommendations:

The proposed SRPP must be amended to describe how local government representatives and the region’s citizens were involved/participated in the development of the SRPP. Additionally, the plan must be amended to describe the process used to develop the “vision” set forth in the plan. In this description, the RPC must include a description of the public participation process that was used to develop the vision.

TCRPC Response: The Coordination Outline provides a description of the process used to develop the “vision”. The Coordination Outline has also been revised to include a description of the public participation process that was used to develop the vision, as well as a new section which includes a description of the public participation process utilized in the development of the SRPP as a whole. The so called “buy-in” was achieved through conducting and participating in, since 1992, 19 charrettes held throughout the Region (approximately 100 public meetings and 500 individual interviews) and the SRPP public participation process (75 individual interviews with local elected officials throughout the Region, 8 public meetings, many additional informal meetings). These are detailed in the Coordination Outline.

10. Finding:

Policy 8.1.2.2 (page II-97), includes a reference to “preferred development form principles.” However, the plan does not include a discussion of how these principles were developed/adopted, who has the authority to enforce these principles, and does not describe how local governments and the Treasure Coast RPC may determine consistency with these principles.

Recommendation:

The “preferred development form principles” policies must be revised to describe how they were developed and how they are to be implemented and reviewed by local governments and the Treasure Coast RPC for consistency with the principles.

TCRPC Response: The Forward, Purpose, Implementation of the Strategic Regional Policy Plan and Executive Summary are newly added sections of the Plan which were developed, in part, to address and clarify these concerns. The Coordination Outline has also been revised to address similar concerns.

The preferred development form is NOT site specific, and the term site specific is not used or implied in the document. No illustration or policy locates new preferred development area. The illustrations that address redevelopment examples may be depicted in existing sites, but are only shown as examples of possible applications of the concepts. The illustrations are not regulatory (unless a local government decides independently to adopt them in some fashion). New language has been included in the Forward, Implementation of the SRPP, and Executive Summary sections that further clarifies this point. A new policy has been added to encourage local governments to develop their own visions and to identify strategic planning areas which offer the best opportunity for implementation of preferred forms of development.

11. Finding:

Several of the policies contained in the proposed SRPP require that planning documents be prepared and task forces be established to address a variety of planning issues. As written, it is unclear as to what entity will be responsible for conducting or staffing these efforts. For example, Policy 3.1.1.1 (page II-59) states: “Prepare redevelopment and revitalization master plans for areas with an identified need.” The plan does not identify who will prepare these plans -- the TCRPC or the local government. Another example is Policy 4.4.1.2 (page 4-29), which calls for the creation of an interdepartmental task force to review existing local comprehensive plans for emergency management issues. It is unclear what entity will initiate the creation of this task force, and where the task force will be housed. Other policies that need clarification include: Policy 16.1.1.1 (page II-108), Policy 1.1.1.6 (page 1-19), Policy 2.6.1.5 (page 2-33), Policy 2.6.1.1 (page 2-33), Policy 2.6.1.7 (page 2-33), Policy 2.8.1.1 (page 2-35).

Recommendation:

Goals, policies, and strategies included in the proposed SRPP that require a specific task force, data base, or activity to be established or completed must be revised to identify the specific entity responsible for conducting the identified activity. For example, Policy 2.6.1.7 (page 2-33), could be rewritten as follows:

The Treasure Coast Regional Planning Council, with assistance from local governments located within the region, establish and staff a task force of public and private members to recommend ways for regulatory (permitting) processes to be made more user friendly and to work with local governments on implementation.

TCRPC Response: The following policies have been revised to identify the entity responsible for conducting the activity:

Policy	Plan Section
3.1.1.1	Future of the Region
16.1.1.1	Future of the Region
1.1.1.6	Affordable Housing
2.6.1.1	Economic Development
2.6.1.5	Economic Development
2.6.1.7	Economic Development
2.8.1.1	Economic Development

12. Finding:

The trends and conditions within the *Future Growth* section of the proposed plan do not adequately describe *current conditions* or set up the associated policies and strategies as set forth in this new vision.

Recommendation:

The *Future Growth* section should be revised to include the associated trends and conditions which describe/set up the *current conditions* within the Treasure Coast region.

TCRPC Response: A new section of the text has been prepared which describes and is entitled “Current Conditions”.

13. Finding:

Policy 5.1.1.2 (page 5-31), states that “natural systems” will be managed, restored, and reestablished. The identification of “natural system” in the Glossary (page D-9), is vague and may limit the region’s application of the policy. In addition, the definitions of “sustainable” (page D-13), and “urban sprawl” (page D-12), are unclear.

Recommendation:

The plan must be amended to provide more meaningful definitions of the terms “natural systems,” “sustainable,” and “urban sprawl.” The definitions for “natural systems” and “urban sprawl” should incorporate the language provided in Rule 62-40.210(16), Florida Administrative Code, and Rule 9J-5.003(140), Florida Administrative Code, respectively.

TCRPC Response: The term “sustainable” has been revised to coincide with the definition used in the Governors Commission for a Sustainable South Florida Report. The definition of the term “urban sprawl” as contained in Rule 9J-5 of the Florida Administrative Code has been incorporated into the SRPP. The term “sprawl” is defined in the Regional Plan, as any development that is not part of the scheme for a City Town or Village. This definition is not seen as being in conflict with the definition of urban sprawl as contained in the Rule. Instead, sprawl is any development (including the Rule definition examples of urban sprawl) which is not part of a City, Town, or Village.

The definition of “Natural Systems” in the Glossary has been clarified by revising it to read: “A natural community or ecosystem or group of adjacent or contiguous natural communities or ecosystems.” This definition is often used to describe an area that has both upland and wetland natural communities. The term implies an ecological interaction between adjacent ecosystems.

The definition of “Natural Systems” provided in Rule 62-40.210(16) is not appropriate for use in the SRPP, because it only refers to aquatic systems. This is because Chapter 62-40 deals exclusively with Water Policy. The fact that the term may be used in a much broader context is suggested in Rule 62-40.210(16), which begins this definition by stating “for purpose of this rule.” The broader definition provided above is more appropriate in the SRPP because the plan deals with more than just water related issues.

14. Finding:

The Affordable Housing section includes policies that address only housing opportunities for moderate and low income persons in the region. The proposed SRPP does not provide trends and conditions statements, goals, policies, and strategies to address the housing needs of *very-low* income residents in the Treasure Coast region.

Recommendation:

The SRPP must be amended to include trends and conditions describing the housing needs of the *very-low* income persons, as defined pursuant to section 420.602(12), Florida Statutes. Further, goals, policies, and strategies must be developed to address these needs.

TCRPC Response: The terms “very low”, “low” and “moderate income” are utilized to better characterize those persons/households whose income is below the median income for the area. The requirement that all three terms need to be utilized together is unnecessary, and in effect, would make the reading of any discussion of affordable housing more difficult. Reference to those persons characterized as “very low” income is found regularly and continuously in the text of the Trends and Conditions section. Reference to the “very low” income has been added to several sections of the text, and to the goals and policies, however, text which was not appropriate to be revised has been retained.

15. Finding:

The affordable housing goals, policies and strategies in the proposed plan do not enhance or further the Housing goal of the SCP, as set forth in section 187.201(5), Florida Statutes, particularly since the proposed plan does not include goals, policies or strategies addressing the affordable housing needs in rural areas of the region.

Recommendation:

The proposed SRPP must be amended to incorporate trends and conditions, goals and policies that address the affordable housing needs for the rural areas located within the region.

TCRPC Response: The State Comprehensive Plan (SCP) makes one reference to housing for citizens in rural areas. This reference is in the Housing Goal, and reads “The public and private sectors shall increase the affordability of housing for low-income and moderate-income persons, including citizens in rural areas,....” Arguably, the SCP does not expect that citizens in rural areas are to be treated differently in the assessment of the affordability and availability of housing, they are simply not to be excluded. The Treasure Coast Region contains a minuscule rural population, which consists of those families living on their family farms, or those agricultural workers who choose to live within the agricultural production areas. While this Region contains residents in non-coastal locations (i.e. Fellsmere, Indiantown, Belle Glade, Pahokee, South Bay), these are residents of cities, towns and villages and should not be deemed to be rural residents. The analysis of the affordability and availability of housing in the region applies to coastal and non-coastal cities, towns and villages. The Region’s Housing Goal 1.1 applies to all residents of the Region and the need to meet identified affordable housing needs whether in a rural or urban location. The Region does have a special need to address housing for agricultural workers,

which is dealt with in some detail in the text of the Affordable Housing subject area and in Goal area 1.4 and others.

16. Finding:

The trends and conditions statements for the *Affordable Housing* section of the SRPP states that affordable housing for renters is an issue in the region and that the local governments have solely focused on affordable housing for owners. The regional goals and associated policies and strategies do not appear to address the need for affordable housing for renters as identified in the TCS. Additionally, neither the TCS nor Goal 11.1 and its associated strategy address the affordable housing issue for the elderly.

Recommendation:

The SRPP should be amended to provide policy guidance for affordable housing for renters and affordable housing for the elderly in the Treasure Coast region.

TCRPC Response: New Strategies 1.2.1 and 1.4.2, and new Policies 1.2.2.1, 1.4.2.1, 1.4.2.2 and 1.4.2.3 have been incorporated into the SRPP which provide the recommended support for those regional issues. The trends and conditions statement has also been expanded relative to the affordable housing needs of renters.

17. Finding:

Several of the policies contained in the proposed SRPP call for streamlining of the project review process, development pre-approval processes and/or concurrency relief for certain types of development. Many of the approval processes and concurrency requirements are subject to statutorily established procedures and standards. For example, Policy 2.4.2.4 (page 2-31), states that “concurrency relief for redevelopment, infill, and new economic development projects that meet preferred development for criteria” should be provided. This policy is inconsistent with current law. Section 163.3180(5), Florida Statutes, states that roads, sanitary sewer, solid waste, drainage, potable water, parks and recreation, and mass transit are subject to the concurrency requirement on a statewide basis and that local governments may *extend* the concurrency requirement on other public facilities within its local jurisdiction. Additionally, the statute provides concurrency relief only to *transportation systems* for projects located within urban infill, urban redevelopment, existing urban service, or downtown revitalization areas under certain circumstances. Other policies that call for streamlined review processes or exemptions include: Policy 15.1.3.1 and 15.1.3.5, (page II-106), and Policy 3.3.8 (page 3-9)

Recommendation:

The RPC must revise Policy 2.4.2.4 (page 2-31), to address the statutory exemption for concurrency and provide additional justification for any regional concurrency substitution program that is consistent with section 163.3180(5), Florida Statutes. Other policies contained within the proposed SRPP that provide for shortened project review and pre-approval processes must be re-evaluated and rewritten to conform with current statutory provisions.

TCRPC Response: Policy 2.4.2.4 has been revised to indicate that local governments should provide assistance in meeting concurrency requirements for projects which meet the preferred development from criteria. No revisions have been made to Policies 15.1.3.1 and 15.1.3.5. However, the following statement has been added to the Forward section of the Plan which address the EOG concern..."It is implicit that all regional goals, strategies, and policies suggesting shortened review processes, preapproval, concurrency relief, or other incentives suggested to encourage preferred forms and patterns of development, will be carried out within the limits of State law."

Policies which indicate that development regulations need to be simplified are not in violation of any statutes to our knowledge. In fact, the SRPP suggests that the simplification of development regulations is a most desirable step which local governments might take to improve the development review process, in general. Many recent studies and articles have made reference to the onerous development review process as a prime culprit in the difficulty of developing affordable housing, for instance.

18. Finding:

Strategy 3.3.2 (page 3-8), requires schools to adopt a level of service to comply with concurrency as set forth in Part II, Chapter 163, Florida Statutes. However, as written this strategy is not consistent with Chapter 95-341, Laws of Florida, "Act Relating to Educational Facilities," which requires local school boards, in coordination and in agreement with the local governments, to adopt a level of service standard for public schools. The adopted levels of service shall be adopted as part of the capital improvements element in the local government comprehensive plan, which shall contain a financially feasible public school capital facilities program established in conjunction with the school board that will provide educational facilities at an adequate level of service necessary to implement the adopted local government comprehensive plan.

Recommendation:

The RPC must revise strategy 3.3.2, (page 3-8), to be consistent with Chapter 95-341, Laws of Florida, "Act Relating to Educational Facilities."

TCRPC Response: Strategy 3.3.2 has been revised to be consistent with Chapter 95-341, an "Act Relating to Educational Facilities".

19. Finding:

As written, strategy 3.3.7 (page 3-9), requires an educational facilities element to be part of the local government comprehensive plans. Pursuant to section 163.3177, Florida Statutes, an educational facilities element is not required to be included in the local government comprehensive plans.

Recommendation:

The RPC must revise strategy 3.3.7 to be consistent with the statute and should include suggestive language for local governments to consider this as an optional element as permitted pursuant to section 163.3177(7)(k), Florida Statutes.

TCRPC Response: Strategy 3.3.7 has been revised to indicate that local governments consider an optional Education Facilities Element as part of their comprehensive plan.

20. Finding:

Policy 8.1.1.3 (page II-97), states “Encourage patterns of development which minimize the public cost for providing services and maximize the use of the existing service systems and facilities.” However, this policy does not address environmental constraints. Although this policy is meaningful, it does not take into consideration environmental/physical limitations with regard to siting service systems and facilities.

Recommendation:

The proposed policy should be revised to be more directive and provide for exceptions to take into consideration the environmental constraints.

TCRPC Response: Policy 8.1.1.3 has been revised to indicate that environmental/physical limitations should be taken into consideration in the siting of service systems and facilities.

21. Finding:

Policy 4.5.2.2 (page 4-30), is inconsistent with other guidance/direction provided in the SRPP. The policy could be interpreted to allow development in high hazard areas. The intent of this policy may be to provide for streamlined post-disaster redevelopment efforts. As written, this policy does not provide clear guidance about what the region intends to achieve regarding high hazard areas.

Recommendation:

Policy 4.5.2.2 must be revised to disallow inappropriate development or redevelopment in high hazard areas and direct development or redevelopment in areas that are not located in a flood plain and to abate or minimize negative impacts on the environmental resources of the region.

TCRPC Response: Policy 4.5.2.2 has been deleted.

22. Finding:

As written, Policy 5.2.3.7 (page 5-34), raises several questions. First, several of the region's municipalities rely upon multi-jurisdictional water utilities for their water supply. Would this policy preclude those local governments from using those existing multi-jurisdictional utilities and require the construction of single jurisdictional facilities?

Second, who would develop the "water availability, use, allocation and management plans? How would these plans be prepared, adopted, and implemented? How would these plans be integrated into the overall growth management planning framework?

Third, how would this policy affect new growth and development that have already been approved by the local governments?

Recommendation:

The TCS included in the proposed SRPP related to water supply must be amended to explain/set up the reasons for and the implications of Policy 5.2.3.7.

TCRPC Response: Policy 5.2.3.7 regarding water supply sources has been deleted.

23. Finding:

As written, Policy 5.6.1.5 (page 5-40), is unclear in that it does not indicate how it may be measured or how it may be used in the review of local government comprehensive plans and plan amendments. Improvement and restoration efforts are significant multi-jurisdictional efforts that may or may not apply to certain local governments located within the region or may affect some local governments more so than others.

Recommendation:

Policy 5.6.1.5 (page 5-40), must be amended to require improved intergovernmental coordination among the affected jurisdictions for the improvement and restoration of the identified resources and systems.

TCRPC Response: Policy 5.6.1.5 has been revised to require improved intergovernmental coordination among the affected jurisdictions for the improvement and restoration of the identified resources and systems.

24. Finding:

The SRPP does not adequately *identify* and *address* historical and archeological resources and facilities.

Recommendation:

The TCS included in the proposed SRPP must be amended to address the protection of historical and archeological resources. The list of *Significant Regional Resources and Facilities* included in the *Economic Development* section must be revised to reference the sites in the Treasure Coast region which are identified on the State's *Historical Register* list.

TCRPC Response: The Economic Development subject area has been amended to address historical and archeological resources. The Significant Regional Resources and Facilities list has been revised to reference sites in the Treasure Coast Region registered on State and federal historical lists.

25. Finding:

Policy 5.1.1.1 (page 5-31), calls for the development of incentives and programs for the preservation of environmentally sensitive lands. The policy states that such incentives should include: tax abatement or incentives, conservation easements, transfer of development rights, *and* purchase of development rights.” As written, the policy could be interpreted as precluding other types of incentive programs. Additionally, policy 5.3.1.7, may limit the use of alternative incentive programs to only land acquisition programs used by the local governments located within the region.

Recommendation:

The policies related to alternative conservation, preservation, and restoration of environmentally sensitive lands should be amended to include specific alternative incentive-based efforts. However, the plan should not seek to limit local governments to just those identified through the SRPP. For example, Policy 5.1.1.1, (page 5-31), could be rewritten as follows:

Develop a framework of incentives and programs for the preservation of environmentally significant natural systems. Include, but do not be limited to the following incentives: tax abatement or incentives, conservation easements, transfer of development rights, or purchase of development rights.

TCRPC Response: Policy 5.1.1.1 has been revised to indicate that the listed incentives are only examples of the incentives and programs which might be used. Acquisition is included as a program. Policy 5.3.1.7 has been revised to indicate that land acquisition and other programs should be utilized to acquire, restore and manage environmentally sensitive natural communities.

26. Finding:

Strategy 2.1.1 (page II-41), includes a directive to “Assign *appropriate* future land use map designations to natural systems and to agricultural and other rural users.” The qualifying term “appropriate” requires a subjective assessment by the local government in determining consistency with this strategy.

Recommendation:

This strategy should be revised to provide clear and specific guidance to the region. For example, the word “compatible” may provide better direction to local governments while still providing for flexibility in applying the policy.

TCRPC Response: Strategy 2.1.1 has been revised to indicate that “compatible” future land use map designations should be assigned.