

EXECUTIVE OFFICE OF THE GOVERNOR

STATE REPORT OF FINDINGS AND RECOMMENDATIONS FOR THE NORTH CENTRAL FLORIDA REGIONAL PLANNING COUNCIL'S STRATEGIC REGIONAL POLICY PLAN February 27, 1996

INTRODUCTION

The *State Report of Findings and Recommendations for the North Central Florida Regional Planning Council's Strategic Regional Policy Plan* has been prepared in accordance with sections 186.507 and 186.508, *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 North Central Florida Regional Planning Council's (NCFRPC's) proposed strategic regional policy plan (SRPP). Additionally, it includes specific recommendations for each finding necessary to make the plan consistent with the Chapter 187, *Florida Statutes* (State Comprehensive Plan), 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 NCFRPC in its continuing development and improvement of the north central Florida region's plan.

A copy of the *State Report of Findings and Recommendations for the North Central Florida 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 NCFRPC 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 NCFRPC's proposed SRPP are incorporated herein for the Council's consideration and use.

Recommendation:

To finalize the SRPP for rulemaking and to help develop the Council's future work plan for continuing to amend the region's plan, the critical and other important comments provided by state and regional government entities need to be considered as the Council finalizes its plan. Those include comments received from the departments of Transportation, Community Affairs, Environmental Protection, Commerce, State, Health and Rehabilitative Services, Florida Game and Fresh Water Fish Commission, Suwannee River Water Management District, and St. Johns River Water Management District. Additionally, any comments received from other reviewers, particularly local governments, are to be considered in revising your plan. As the NCFRPC continues to develop its region's SRPP, it should ensure that the plan is consistent with and furthers the State Comprehensive Plan (SCP).

NCFRPC Response: Revisions to the proposed plan have been made, when appropriate, to address all EOG comments. Additionally, the Council has reviewed and considered all comments received from state and regional agencies as well as local governments. Many changes have been made to the plan in response to these comments.

2. Finding:

The state's review and analysis of the proposed SRPP were enhanced by the February 5, 1996, meeting with the NCFRPC executive director and staff and representatives of state and regional agencies. The meeting was held to discuss comments, questions and concerns regarding the proposed plan. As expressed at that meeting, the NCFRPC's commitment to amend and improve the plan will allow the SRPP to be as strategic, accurate and updated as possible to serve as a guide for the north central Florida region.

Recommendation:

As discussed in the February 5, 1996 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, future revisions to the SCP, updated data and information, and the findings and recommendations of other current planning activities and programs, such as the metropolitan planning organization (MPO) Year 2015 Transportation Plan, Campus Master Plans, Florida Greenways, and ecosystem management projects. Pertinent regional guidance from such programs should be incorporated into the north central Florida region's SRPP.

NCFRPC Response: The Council has been guided in the preparation of the regional plan by the plans and programs of local governments and state agencies, including but not limited to the Metropolitan Transportation Planning Organization for the Gainesville Urbanized Area, the Florida Greenways Commission, the Florida Department of Environmental Protection's Ecosystem Management Program as applied to Ichetucknee Springs State Park, and local government comprehensive plans. Since these plans and programs change from time to time, it is important for the Council to constantly monitor and amend its plan accordingly.

3. Finding:

Goals 4.1. through 4.4. and Goal 4.6. are not consistent with and do not further the SCP. Use of the word "should" rather than "shall" makes these goals more permissive than the goals and policies in the SCP. Further, these goals do not provide an adequate and clear description of the long-term end toward which programs and activities are ultimately directed.

Recommendation:

The goals contained in the *Natural Resources of Regional Significance* section of the proposed SRPP must be amended to be consistent with the SCP, other pertinent statutes and rules, and to provide an adequate and clear description of the long-term end toward which programs and activities are ultimately directed. Goals 4.1. through 4.4. and Goal 4.6. must be revised to omit the terms "should" and "shall" or the term "should" must be replaced with "shall." For example, Goal 4.1., could be rewritten as follows:

Preserve the natural functions and integrity of the Big Bend coastal and marine resources for existing and future generations of residents.

OR

*The natural functions and integrity of the Big Bend coastal and marine resources **SHALL** be preserved for existing and future generations of residents.*

NCFRPC Response: The referenced goals have been amended as follows:

REGIONAL GOAL 4.1. Preserve Big Bend coastal and marine resources identified as Natural Resources of Regional Significance for future generations of residents in recognition of their economic and ecological importance to the region. Recognizing their economic as well as ecological importance to the region and the state, the natural functions and integrity of the Big Bend Coastal and Marine Resources should be preserved for existing and future generations of residents.

REGIONAL GOAL 4.2. Maintain an adequate supply of high-quality groundwater to meet the needs of north central Florida residents, in recognition of its importance to the continued growth and development of the region. Recognizing its importance to the continued growth and development of the region, an adequate supply of high-quality groundwater should be maintained to meet all the needs of the residents of the region, both now and in the future.

REGIONAL GOAL 4.3. Recognizing their importance to maintaining adequate supplies of high-quality groundwater for residents of the region, both now and in the future, Protect the natural functions of all sources of recharge to the Floridan aquifer should be protected from any all activities which would impair these functions or cause a degradation in the quality of the water being recharged in recognition of the importance of maintaining adequate supplies of high-quality groundwater for the region.

REGIONAL GOAL 4.4. Maintain the identified attributes of regionally significant habitat areas in order to ensure the survival of flora and fauna native to the region. In order to ensure the future survival of flora and fauna native to the region, the natural functions and integrity of strategic habitat conservation areas identified as natural resources of regional significance should be maintained.

REGIONAL GOAL 4.67. Maintain the quantity and quality of the region's surface water systems in recognition of their importance to the continued growth and development of the region. Recognizing their importance to the continued growth and development of the region, the quantity and quality of the region's surface water systems should be maintained for future generations.

4. Finding:

Goal 4.5., page IV-54, is not consistent with the SCP, is not meaningful and does not provide adequate guidance to the region because:

- 1) the condition of protection of the "Planning and Resource Management Areas" is more permissive than the SCP [section 187.201(10)(a), *Florida Statutes*];
- 2) the "amount and degree of protection" needed is undefined in the plan;
- 3) the goal creates an undefined test of *proportion to need*;
- 4) the plan does not provide for quantifying the "need to protect;" and
- 5) the "purpose and function" of the natural resources is undefined.

Recommendation:

Goal 4.5., must be amended or rewritten to be consistent with the SCP and provide adequate guidance to the region.

NCFRPC Response. Goal 4.5 has been amended as follows:

REGIONAL GOAL 4.56. Protect natural resources of regional significance identified in this plan as “Planning and Resource Management Areas.” The amount and degree of protection established by state and local agencies for areas included in this classification entitled “Planning and Resource Management Areas” should be directly proportional to the need to protect their purpose and function.

5. Finding:

The proposed SRPP is not consistent with section 187.201(10)(b)4. and 5., *Florida Statutes*, and sections 27E-5.002(4), and 27E-5.004(3), *Florida Administrative Code* because the proposed plan does not adequately identify and address endangered and threatened species, and species of special concern, and does not justify their omission as natural resources of regional significance.

Recommendation:

To be consistent with section 187.201(10)(b)4. and 5., *Florida Statutes*, and sections 27E-5.002(4), and 27E-5.004(3), *Florida Administrative Code*, the trends and conditions statement (TCS) must be amended to identify endangered and threatened species, and species of special concern, and the problems and opportunities related to the protection of these species and their habitat. The plan also must be amended to include goals and policies that provide for the protection of endangered and threatened, and species of special concern.

NCFRPC Response. The Natural Resources of Regional Significance TCS has been amended to recognize listed species as natural resources of regional significance. Additionally, the following goal and policies have been added to address listed species:

REGIONAL GOAL 4.5. Protect all listed species located in north central Florida.

Regional Indicators:

As of November, 1995, the Florida Natural Areas Inventory Database contains 610 locations within the region of sightings of listed plant and animal species.

Policy 4.5.1. Work with local governments and the Florida Game and Fresh Water Fish Commission to ensure the survival of all listed species found in the region.

Policy 4.5.2. Increase citizen awareness on the effects of human activities on listed species.

Policy 4.5.3. Coordinate planning efforts to protect listed species found within the region.

6. Finding:

The SRPP is to provide guidance for the physical, economic and social development of the region, to serve as a basis for review of DRIs and local government comprehensive plans, and to provide a regional basis and perspective for the resolution of identified problems and needs. Several of the proposed goals are too broad, and contain vague or undefined terminology making it impossible to determine consistency with the SCP. They also do not provide specific guidance to the region as required by section 27E-5.004(6), *Florida Administrative Code*. For example:

- Goal 2.1., page II-54, implies that the region's goal is to expand and retain *existing* businesses but provides no regional guidance addressing *new* business recruitment.
- Goal 2.3, page II-55, is too broad to provide regional guidance for expanding tourism in the region.
- Goal 5.2., page V-16, addresses a problem that is not established as regionally significant in the associated TCS. Most of the problems and threats posed by the University of Florida growth should be able to be addressed or settled in the Campus Development Agreement due to be submitted to the City of Gainesville on July 29, 1996, rather than in the SRPP.
- Goal 5.3., page V-17, appears to be superfluous because it addresses maximizing the use of the existing airport facilities before developing new facilities when the associated TCS and regional indicator show that enplanements have been decreasing in the region since 1980, and dramatically since 1990. The necessity and validity of the goal is unclear. Further, the TCS indicates that enplanements are *increasing*, yet the data presented in the plan (page V-6) demonstrates that enplanements are *decreasing*.

Recommendation:

Each of the proposed goals must be thoroughly evaluated for consistency with the SCP, to provide clear and specific guidance to the region, to determine validity, and to respond adequately to the regionally significant problems and opportunities identified in the associated TCSs. For example, Goal 2.1. could be rewritten as follows:

Attract new high paying and value-added industries and expand existing businesses.

NCFRPC Response. Regional goals 2.1, 2.3, and 5.2 have been revised as follows:

REGIONAL GOAL 2.1. ~~Retain and expand existing businesses located within the region~~ Attract new high paying, value-added industries and expand existing businesses in the region.

REGIONAL GOAL 2.34. Expand the regional tourism industry.

REGIONAL GOAL 5.2. Mitigate adverse impacts to ~~the Gainesville Central City TCMA~~ regional transportation facilities associated with enrollment growth at the University of Florida.

With regards to Goal 5.3, additional language has been added to the TCS which documents the need for this goal. Conflicting language within the TCS regarding enplanements has been corrected.

7. Finding:

Several of the proposed policies are inconsistent with section 27E-5.004(7), *Florida Administrative Code*, and may not be consistent with the SCP because they contain vague or undefined terminology and/or the purpose is unclear making it impossible to determine consistency with the SCP, and/or do not provide adequate guidance to the region. For example:

- Policies 4.3.3., 4.4.5., 4.5.2., and 4.6.1. do not provide adequate guidance to the region because:
 - 1) they are unclear as to what “environment” is to be pursued, and
 - 2) the justification for “minimum regulatory burden” is not defined or established in the proposed plan.
- In addition to the above, Policy 4.5.2. does not:
 - 3) define or explain “natural function/purpose,” and
 - 4) clearly identify the referenced “classifications.”
- There are no associated policies for Goal 3.1., page III-13, regarding development in the Coastal High Hazard Areas.

Recommendation:

The proposed policies in the plan must be thoroughly evaluated to determine consistency with the SCP, to provide clear and specific guidance to the region, to clarify their purpose, and to respond adequately to the regionally significant problems and opportunities identified in the associated TCSs.

For example, policies could be added to Goal 3.1. similar to the following:

Avoid expenditure of state funds that subsidize development in Coastal High Hazard Areas.

NCFRPC Response: The Council has added the following policy to Goal 3.1:

Policy 3.1.5. With the exception of enhancements necessary for the health, safety, and welfare of its residents, avoid the expenditure of state funds that subsidize development in Coastal High Hazard Areas.

Additionally, the Council has amended the referenced policies as follows:

~~Policy 4.3.3. Encourage state and local regulatory agencies to p~~ Pursue an regulatory environment consisting of the minimum regulatory burden necessary for the maintenance of the natural functions the quantity and quality of groundwater recharge inof Areas of High Recharge Potential to the Floridan Aquifer, Ichetucknee Trace, Stream-to-Sink Watersheds and Sinks identified as natural resources of regional significance.

~~Policy 4.4.5. Encourage state and local regulatory agencies to pursue an environment consisting of the minimum regulatory burden necessary for the maintenance of the identified attributes of strategic habitat conservation areas identified as natural resources of regional significance.~~

~~Policy 4.56.32. Provide technical assistance to local governments in the development of appropriate local government comprehensive plan policies and land development regulations necessary to maintaining the natural functions and purpose of areas or and water bodies included in this classification~~ identified as natural resources of regional significance classified in this plan as “Planning and Resource Management Areas.

~~Policy 4.67.1. Encourage state and local regulatory agencies to p~~ Pursue an regulatory environment consisting of the minimum regulatory burden necessary for the maintenance of the quantity and high quality of the region’s surface water systems.

The phrase “regulatory environment” refers to all government plans, goals, policies, standards, and regulations which directly or indirectly affect land and land development. The phrase “regulatory environment” has been added to the Glossary. The “minimum regulatory burden” is defined by the courts on a case-by-case basis.

8. Finding:

The TCSs included in the proposed SRPP are inconsistent with sections 186.507(3) and (4), *Florida Statutes*, and section 27E-5.004(4), *Florida Administrative Code*, because they are not based upon expected growth patterns of the region and do not include any discussion or analyses of the region’s current or future population or growth patterns. Additionally, the TCS for each strategic regional subject area does not provide a basis and framework for the associated regional goals and policies. Examples include:

- Goal 1.2., page I-28, addresses premature deterioration/demolition of residential units, but no analysis is provided in the associated TCS concerning the subjects of the goal.
- Goal 3.3., page III-14, addresses improving response times of regional hazardous materials response teams, but there is not any data about response times, the number of cases in which response times were too slow or the magnitude of the threat to the region because of slow response times.
- Goal 5.4., page V-17, references the region’s railroads; however, the associated TCS fails to provide any analysis that shows any threat or problem that could result in the loss of the railroads.
- Several policies contained in the *Natural Resources of Regional Significance* section (i.e., Policies 4.3.6., 4.4.6., 4.5.4., and 4.6.3.) encourage continued or expanded public acquisition of properties within the region to provide resource protection. The need for continued or expanded public acquisition or the viability of alternative resource protection methods such as less-than-fee purchase is not discussed or “set-up” in the associated TCS.
- Policy 4.5.7., page IV-55, requires the implementation of the “Green Line protection goals and objectives;” however, these “goals and objectives” are not identified or discussed in the trends and conditions.
- Policy 5.1.5., page V-15, requires that the NCFRPC provide technical assistance to the north central Florida Transportation Disadvantaged service providers. This program is not discussed in the associated trends and conditions and the service providers are not identified.

Recommendation:

The TCS must be amended to provide a discussion and analysis of the growth patterns of the region (including an analysis of the current **AND** projected population of the region) and the associated impacts on the strategic regional subject areas.

The TCS associated with **EACH** of the strategic regional subject areas must be amended to provide a basis\background or to establish the region’s need for each regional goal and policy.

NCFRPC Response. The Economic Development element has been amended to include an extensive analysis of population trends and conditions.

With regards to comments addressing premature deterioration/demolition of residential units, Goal 1.2 and its associated policies and regional indicators have been deleted from the plan.

With regards to comments regarding Goal 3.3, the Emergency Preparedness element has been amended to address response times of regional hazardous materials response teams.

With regards to Goal 5.4, the Transportation element TCS has been amended to address regional concerns regarding potential adverse economic development impacts as a result of a loss of rail access to north central Florida communities.

Policies 4.3.6, 4.4.6, 4.5.4, and 4.6.3, theses policies have been temporarily deleted until such time as the Council has the resources to properly “set-up” these policies in the TCS.

With regards to Policy 5.1.5, the Council has substantially revised the Regional Transportation element TCS to address the transportation disadvantaged. As a result of the revision, Policy 5.1.5 has been replaced with Goal 5.5 and associated policies which are as follows:

Public Transit Service Providers

REGIONAL GOAL 5.5. Reduce the unmet General Trip demand of the north central Florida Transportation Disadvantaged population.

Regional Indicator

An estimated 807,917 general demand trips, 82.8 percent of total estimated transportation disadvantaged trips, were unmet in 1995.

Policy 5.5.1. Improve mobility options for low-income, elderly and disabled citizens.

Policy 5.5.2. Increase funding for coordinated transportation systems for the transportation disabled.

Policy 5.5.3. Provide technical assistance to designated north central Florida community transportation coordinators.

9. Finding:

The TCSs in the SRPP provide a good description of each strategic regional subject area; however, the TCSs are inconsistent with section 186.507(3), *Florida Statutes*, and 27E-5.002(11), *Florida Administrative Code* because they do not provide the necessary background **analyses** of factors that describe current conditions and **projections**.

Recommendation:

As required by section 27E-5.002(11), *Florida Administrative Code*, the TCSs for each strategic regional subject area must be amended to include background **analyses** that interpret significant trends, conditions and **projections**.

NCFRPC Response: Additional analysis has been added to every TCS. The Council recognizes that, in many instances, the SRPP does not contain projections of current trends. Projections will be added to the plan as time and resources allow.

10. Finding:

The proposed SRPP may be inconsistent with section 186.507(3), *Florida Statutes*, and section 27E-5.004(5), (6) and (7), *Florida Administrative Code*, because it does not address some significant regional problems and needs in the TCSs, goals and policies. Examples of significant regional problems and needs not identified and analyzed in the plan include:

- hurricane evacuation routes and clearance times;
- the regional value of natural areas such as uplands, estuaries and wetlands;
- mining activities in environmentally sensitive areas;
- partnerships with the University of Florida for regional advancements, such as agriculture, tourism, mining, and value-added industry; and
- the influx of elder residents into the region.

Recommendation:

To be consistent with section 186.507(3), *Florida Statutes*, and section 27E-5.004(5), (6) and (7), *Florida Administrative Code*, the SRPP must be amended to provide TCS analyses and policy guidance for all significant regional problems and needs.

NCFRPC Response. With regards to hurricane evacuation routes and clearance times, the Emergency Preparedness Element has been revised to address and identify hurricane evacuation clearance times and shelter capacities.

With regards to the regional value of natural areas such as uplands, estuaries, and wetlands, the SRPP identifies and addresses all uplands, estuaries, and wetlands which are identified by the Council as Natural Resources of Regional Significance.

With regards to mining activities, the following policies have been added to the SRPP:

Policy 4.3.9. Minimize the effect of mining activities on water quality and quantity of the Floridan Aquifer.

Policy 4.7.16. Minimize the effect of mining on the surface water quality and seasonal flows of surface waters identified as natural resources of regional significance.

With regards to partnerships with the University of Florida, the following policy has been added to the SRPP:

Policy 2.3.2. Continue working with the University of Florida to improve the regional economy.

With regards to the influx of elder residents to the region, the Economic Development element TCS has been revised to include trends and projections regarding elderly populations.

11. Finding:

The regional goals and policies contained in the proposed SRPP are to be developed from, and related to the problems, needs and opportunities identified in the TCSs. The TCSs in the proposed SRPP are inconsistent with section 186.507(4), *Florida Statutes*, and section 27E-5.004(6) and (7), *Florida Administrative Code*, because they identify several regionally significant problems, needs or opportunities that do not have associated goals and policies. For example:

- The *Affordable Housing* section highlights several housing **problems** facing the region such as increased reliance upon mobile homes, housing quality, and housing affordability. The proposed SRPP does not include adequate goals or policies that specifically address these regional problems.
- The *Economic Development* section demonstrates that the per-farm income in north central Florida is only 37.7 percent of the statewide average, and that the region's farm acreage has declined by 28.7 percent from 1982 to 1992. This is a significant regional **problem**; however, the plan does not include goals or policies to guide the region in addressing these problems.
- The *Economic Development* section, page II-48, identifies private-public sector cooperation as a regional **opportunity** for downtown revitalization and economic development within the region. However, there are no associated goals or policies to guide the region to build upon these opportunities.

Recommendation:

The proposed SRPP must be amended to include goals and policies for the significant regional problems, needs and opportunities identified in the TCSs.

For example, the agricultural problems and opportunities identified in the TCSs could be addressed by adding a goal, indicators and policies similar to the following:

Goal: *Expand food, agriculture, aquaculture, silviculture and related industries in order to be a competitive force in state, national and international marketplaces.*

Indicators: *Farm cash receipts from and acres of land currently used for agriculture.*

Gross sales and acres of land used for silviculture.

Gross sales and acres of water surface used for aquaculture.

Policy: *Protect and expand agricultural and forestry resources and activities by implementing initiatives such as ad valorem tax incentives and best management practices.*

Policy: *Work with the Institute of Food and Agricultural Science at the University of Florida to research, develop, and apply agricultural technology to be utilized in the production and marketing of the region's agricultural products.*

Policy: *Establish public/private partnerships to provide technical, financial and information services to the agricultural sector.*

NCFRPC Response. Every TCS has been amended to include a subsection entitled “Problems, Needs, and Opportunities.” The Introduction section of the SRPP states that this subsection of the TCS is the only place the regional plan identifies problems, opportunities, and needs as required by Rule 27E-5.002(11). This subsection has been added for purposes of clarification so that the reader may clearly identify problems, opportunities, and needs.

The EOG has misinterpreted the regional plan by identifying mobile homes as a problem. The TCS identifies an increasing percentage of the region’s housing stock as comprised of mobile homes. While this is an observation of the TCS, it is not recognized in the SRPP as a problem.

The Affordable Housing Problems, Needs, and Opportunities subsection has been amended as follows:

The Council identifies the following affordable housing problems, opportunities, and needs:

A need exists to reduce the percentage of the region’s very low-, low-, and moderate-income households who spend more than 30 percent of their annual household income on housing.

With regards to EOG comments regarding the TCS as identifying public-private sector cooperation as a regional opportunity for downtown revitalization, the referenced sentence, which is located on page II-54 of the TCS, has been deleted as not being material to the discussion.

With regards to agriculture, the Council has added the following goal and associated policies to the Economic Development element:

REGIONAL GOAL 2.3. Expand north central Florida food, agriculture, aquaculture, forestry and related industries in order to be a competitive force in state, national, an international marketplaces.

Regional Indicators

1. In 1990, 6,914 north central Florida residents were employed in Agriculture, Forestry, and Fishing.

2. In 1990, 4.6 percent of all north central Florida employed residents were employed in Agriculture, Forestry, and Fishing.

Policy 2.3.1. Protect and expand agricultural and forestry resources and activities by implementing initiatives such as best management practices.

Policy 2.3.2. Continue working with the University of Florida to improve the regional

economy.

Policy 2.3.3. Establish public/private partnerships to provide technical, financial, and information services to the agricultural sector.

12. Finding:

The *Regional Resources and Facilities* section is not consistent with section 186.507(3), *Florida Statutes*, and section 27E-5.004(5), *Florida Administrative Code*, because:

- the section does not **address** regional resources and facilities identified in the *Regional Resources and Facilities* section, and
- the proposed SRPP does not identify and address all resources and facilities that are regionally significant such as historical and archeological sites, evacuation shelters, Florida Greenways (see attached copy of a Governor’s Greenways Proclamation and a list of proclaimed Florida Greenways located in the NCFRPC) and U.S. Highway 90, and other resources and facilities that may be regionally significant such as ecosystem management projects, hiking trails, and cultural facilities.

Recommendation:

The SRPP must be amended to identify and **address** regionally significant resources and facilities including historical and archeological sites, evacuation shelters, Florida Greenways and U.S. Highway 90. Further, in order to make the lists of Regional Resources and Facilities more user friendly, the plan needs to be amended to incorporate a comprehensive listing of all identified regionally significant resources and facilities and/or amended to refer to the various lists (and their location, i.e., page numbers) contained throughout the proposed plan.

Florida Greenways, Marjorie Kinnan Rawlings State Historical Site, the Center for Performing Arts, and the Florida Trail have been added to the Regional Facilities element. Evacuation shelters have been added to the list of regionally significant emergency preparedness facilities. U.S. Highway 90 has been added to the list of regionally significant transportation facilities.

13. Finding:

As written, many of the proposed policies are not consistent with the definition of “policy” as provided in section 27E-5.002(6), *Florida Administrative Code* because they 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 “encourage,” “ensure,” “promote,” “support,” and “address,” do not provide clear guidance to be consistent with the SCP or do they provide adequate guidance for local governments to amend their comprehensive plans in order to be consistent with the SRPP. Policies

which do not adequately identify how the region will achieve its goals include: Policies 1.1.2., 2.2.1., 2.2.3., 3.3.4., 4.6.16., 5.2.2., and 5.4.1.

Recommendation:

The SRPP must be amended to delete the use of terms which do not provide clear regional guidance and to be consistent with the SCP. For example, Policy 5.4.1. could be rewritten as follows:

Maintain and/or upgrade freight rail lines to meet federal and state safety standards.

As another example, Policy 1.1.2., could be rewritten as follows:

Provide incentives, such as density bonuses, to private builders of residential dwelling units who construct 10.0 percent or more of their units for very low-, low-, and moderate-income households.

NCFRPC Response. The Council has revised all SRPP policies accordingly.

14. Finding:

The proposed maps and list 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 endangered and threatened species or species of special concern on the maps and list of NRRS.

Recommendation:

The NRRS maps and list must be amended to incorporate the best available data regarding natural resources of regional significance including endangered and threatened species and species of special concern.

NCFRPC Response: ~~The SRPP identifies and maps Strategic Habitat Conservation Areas greater than 20 acres in size as natural resources of regional significance. As indicated in the TCS, these are areas which are either inhabited by or provide habitat capable of supporting listed species. Each SHCA is described and a listing of species found in each area is included in the TCS. The plan includes goals and policies designed to ensure the survival of SHCAs and by so doing, the survival of all species native to north central Florida, including listed species. In response to the EOG comment, the SRPP has been amended to identify all listed species as natural resources of regional significance. Maps of Strategic Habitat Conservation Areas have been deleted from the regional plan. The Council has substituted regionally significant habitat areas for Strategic Habitat Conservation Areas in Table 4.1.~~

15. Finding:

Many of the proposed SRPP policies describe work activities of the RPC staff rather than define programs and activities and provide guidance toward goal attainment. As a result, the policies are inconsistent with sections 27E-5.001(1), and 27E-5.003(1), (6) and (7), *Florida Administrative Code*. Examples of these policies include those associated with Goal 5.1., and Policies 1.1.5., 2.3.1., and 2.3.2.

Recommendation:

The proposed policies contained in the SRPP which imply work activities solely for the RPC must be amended to provide clear guidance to the region to support goal attainment rather than RPC workload. For example, the policies associated with Goal 5.1. could include any or all of the following:

- *Mitigate adverse impacts of development upon regional transportation facilities.*
- *Prevent highway demands created by growth from degrading level of service standards on the Florida Intrastate Highway System (FIHS) below those established by the Florida Department of Transportation.*
- *Prevent highway demands created by growth that will degrade level of service standards on non-FIHS facilities below those adopted in LGCPs.*
- *Coordinate with state agencies to identify reserved or dedicated rights-of-way to protect critical transportation corridors.*
- *Develop a mechanism by which regional transportation priorities are defined and understood among all counties that are not represented by the Gainesville MPO.*
- *Direct future transportation improvements to aid in the management of growth and to promote economic development in designated areas .*

NCFRPC Response. The following policies have been added to Regional Goal 5.1:

Policy 5.1.7. Mitigate adverse impacts of development upon regional transportation facilities.

Policy 5.1.8. Mitigate impacts created by development so as to maintain the minimum level of service standard on the Florida Intrastate Highway System (FIHS) as established by the Florida Department of Transportation.

Policy 5.1.9. Mitigate impacts created by development so as to maintain the minimum adopted level of service standard on non-FIHS roads identified in this plan as significant regional transportation as established in local government comprehensive plans.

Policy 5.1.10. Coordinate with state agencies to identify reserved or dedicated rights-of-way to protect critical transportation corridors.

Policy 5.1.11. Develop a mechanism by which regional transportation priorities are defined and understood among all counties that are not represented by the Metropolitan Transportation Planning Organization for the Gainesville Urban Area.

Policy 5.1.12. Direct future transportation improvements to aid in the management of growth and that promote economic development in designated areas.

16. Finding:

Most regional *indicators* contained in the proposed SRPP will not allow progress to be adequately measured towards goal achievement and therefore are inconsistent with section 27E-5.004(6), *Florida Administrative Code*. For example:

- Indicators 1 and 2, for Goal 2.3., page II-55, measure licensed hotel/motel rooms and restaurant seating capacity. It is unclear how these indicators adequately measure progress in expanding regional tourism throughout the *entire* north central Florida region rather than in the corridors adjacent to the interstate highways. Further, it is confusing to use only these indicators in absence of other indicators such as tourism/recreational sales tax, by type, collected by the Department of Revenue.
- The indicators for Goal 3.1., page III-13, measure the number of weather buoys and emergency warning sirens, and the National Oceanographic and Atmospheric Administration weather radio transmission coverage for the region. It is unclear how these indicators adequately measure regional emergency *preparedness* because they do not include measurement of emergency shelter capacity and evacuation clearance times.
- The indicators for Goal 4.1., page IV-50, measure the acreage of the Big-Bend saltmarsh and seagrass beds, and the Florida Middle Ground. It is unclear if the data related to these areas in the proposed plan are valid, who collects this data, and how and by whom it will be collected in the future.

Additionally, the proposed SRPP does not define "indicators" or explain how this plan component is to be used.

Recommendation:

The indicators in the proposed SRPP must be evaluated and amended to provide valid, reliable and appropriate measures by which progress can be assessed toward goal attainment as required in rule 27E-5.004(6), *Florida Administrative Code*. The purpose and function of the indicators also must be defined in the SRPP in order that the interested public may understand their intended use.

NCFRPC Response. Good regional indicators which fully meet the requirements of 27E-5.004(6), F.A.C., are difficult to find. The Council remains open to specific recommendations for better regional indicators. Regional Goal 2.3 and its associated indicators are as follows:

REGIONAL GOAL 2.3⁴. Expand the regional tourism industry.

Regional Indicators

- 1. In 1993, there were 7,315 licensed hotel and motel rooms in the region.**
- 2. In 1993, the licensed seating capacity of all north central Florida restaurants was 51,208.**
- 3. In Fiscal Year 1993-94, total annual attendance at state parks, preserves, and other state-owned areas located in north central Florida was 530,626.**

Council review of Department of Revenue sales tax reporting categories reveals no such “tourism/recreational sales” category. The closest tourist-related categories are #8, Restaurants and Lunch Rooms, #9 Taverns, Night Clubs, #59 Admissions, and #85, Hotels, Apartment Houses, Etc. The Council fails to see how reporting sales tax revenue collected at restaurants, lunch rooms, taverns, and night clubs offers a better understanding of tourism activity than the Council’s chosen measure, licensed restaurant seating capacity. Additionally, sales tax rates can change over time, skewing year-to-year comparisons. The measure of annual attendance at state parks, preserves, and other state-owned areas is a superior measure of tourism activity when compared to Admissions sales tax revenues as the Admissions sales tax category includes the sale of movie theater tickets. The number of licensed hotel rooms is a superior measure of tourism activity than the Apartment Houses, Etc, sales tax category since the latter includes dwelling units which are more likely to be occupied by residents than tourists.

Since only 4 of the 11 counties in the region have enacted a tourist development tax, using tourism development tax receipts would produce an inaccurate measure of regional tourism activity since counties drop the optional tax. Counties could also change the amount of the tax over time, thereby adding even more confusion to this proposed indicator.

With regards to EOG comments on emergency preparedness, the Regional Indicators for Regional Goal 3.1 have been amended as follows:

REGIONAL GOAL 3.1. Improve emergency preparedness for coastal storms in the region.

Regional Indicators

1. **As of June 1, 1995, one coastal weather buoy exists in the Gulf of Mexico located approximately 100 miles southwest of Horseshoe Beach.**
2. **As of June 1, 1995, NOAA weather radio transmissions covered 20.0 percent of the region.**
3. **As of June 1, 1995, one north central Florida coastal community had an emergency warning siren.**
4. **As of January 1, 1996, Dixie County had a surplus of 1,569 public shelter spaces.**
5. **As of January 1, 1996, Taylor County had a surplus of 4,931 public shelter spaces.**
6. **As of January 1, 1996, Dixie County had a Long Response clearance time of 9.00 hours.**
7. **As of January 1, 1996, Taylor County had a Long Response clearance time of 9.25 hours.**

With regards to EOG comments on the Big Bend Saltmarsh and Big Bend Seagrass Beds, Goal 4.1 and its associated regional indicators have been amended as follows:

REGIONAL GOAL 4.1. Preserve Big Bend coastal and marine resources identified as Natural Resources of Regional Significance for future generations of residents in recognition of their economic and ecological importance to the region. Recognizing their economic as well as ecological importance to the region and the state, the natural functions and integrity of the Big Bend Coastal and Marine Resources should be preserved for existing and future generations of residents.

Regional Indicators

1. **In 1996, the Big Bend Salt Marsh comprised 46,189 acres.**
- ~~2. In 1996, the Big Bend Seagrass Beds comprised 165,599 acres.~~

2. In 1983, the Big Bend Seagrass Beds, extending to the jurisdictional limits of the State of Florida off Dixie and Taylor counties, were comprised of 1,781,670 acres of Dense Seagrass, 92,320 acres of Patchy Seagrass, and 208,980 acres of Sparse Seagrass.¹
3. In 1996, the Florida Middle Ground comprised 132,000 acres.

The footnote to Regional Indicator 2 reads as follows:

Tim Leary, Florida Marine Research Institute, March, 1996. According to the Dick Sargent, Assistant Research Scientist at the Institute, the 1983 data represents the best available information regarding the aerial extent of the Big Bend Seagrass Beds. A new study currently underway will map the Big Bend Seagrass Beds based upon aerial photo-interpretation which will be done by the National Biological Service using December 1991 1:24,000 natural color aerial photos. The new seagrass classification system will consist of “continuous” and “patchy” categories. Patchy will break down into 4 classifications of percent of cover. The 1983 data will not be directly comparable to the 1991 data as the older study used a combination of aerial photos and diver tows/transects to map those seagrasses not visible on aerial photos. The new study will only map habitat which is directly visible from aerial photos.

17. **Finding:**

The proposed SRPP includes several internal discrepancies and contradictory statements. For example:

- Goal 2.4., page II-55, is vague, and is unclear because it seeks to maintain “economic stability” in a region that has high unemployment and low opportunity, thereby seeking maintenance of a condition or state that does not exist.
- The *Affordable Housing* section identifies mobile homes as a regional *opportunity* as an “affordable alternative to conventionally-built, detached, single-family residential homes.” However, the *Emergency Preparedness* section presents the increased reliance upon mobile homes as a regional *problem* due to the adverse impact on the region’s emergency shelter capacity. Additionally, the plan does not include goals or policies to address the affordable housing or emergency preparedness issues of mobile homes.
- The Strengths and Weaknesses portion of the *Economic Development* section, page II-44, states that “Many industrial parks with water, sewer, natural gas, and electricity to meet the demands of new industries;” however, the proposed SRPP states on page II-45, that “many north central Florida communities are lacking in facilities and infrastructure normally associated with and necessary for industrial activities.”

- The Transportation section, page V-6, states that enplaned passengers *increased* by 6.1 percent from 1980 to 1990; however, figures provided show that the number of passengers *decreased* from 177,104 in 1980, to 166,264, in 1990, to 140,134, in 1992.

Recommendation

The plan must be amended to address these discrepancies.

NCFRPC Response. Goal 2.4 has been amended as follows:

REGIONAL GOAL 2.45. ~~Maintain economic stability throughout the region~~ Reduce the regional unemployment rate.

EOG is misinterpreting the regional plan with regards to mobile homes. The Affordable Housing TCS does not identify mobile homes as a regional opportunity nor does the Emergency Preparedness element identify the increased reliance upon mobile homes and their impact on emergency shelter capacity as a regional problem. As noted in Table 3.2, the region has, and is projected to continue to have, a large surplus of emergency shelter spaces through the year 2000. The Emergency Preparedness TCS problems, needs, and opportunities subsection does identify a need for all north central Florida local governments to become signatories to the Statewide Mutual Aid Agreement for Catastrophic Disaster Response and Recovery in order to assure that shelter space will be provided when needed by inland north central Florida local governments.

The Council has addressed EOG's comments regarding discrepancies contained in the Economic Development and Regional Transportation elements.

18. Finding:

The proposed plan does not identify and address the relationships among the strategic regional subject areas. Clearly, the problems and opportunities affecting the north central Florida region apply to multiple strategic regional subject areas.

Recommendation:

The proposed SRPP should be amended to address the integration and linkage between the strategic regional subject areas.

NCFRPC Response. Integration and linkage between the strategic regional subject areas has been improved.

19. Finding:

Although the maps provided are at the required scale of 1:100,000, it is difficult to determine the portion of the region shown on each map overlay in relation to the overall region. This makes it difficult for the reader to adequately locate the resources identified.

Recommendation:

In order to make the NRRS maps more user friendly, **each** map overlay must identify which portion of the region is shown.

NCFRPC Response. The referenced locator map has been added to each map. A sample is attached to this response.

20. Finding:

The Introduction, on page x, refers to a *References* section that lists the data sources used in the development of the SRPP. However, no *References* section is included in the proposed SRPP.

Recommendation:

The SRPP needs to be amended to include a References section that includes a bibliography of the data sources used in the development of the SRPP.

NCFRPC Response. The SRPP discussion regarding references has been amended accordingly. All sources used in the development of the SRPP are contained in footnotes.

March 27, 1996

Mr. Charles Justice
Executive Director
North Central Florida Regional Planning Council
2009 North West 67 Place
Gainesville, Florida 32653-1603

Dear Mr. Justice:

Thank you for the opportunity to review the March 28 revised North Central Florida Regional Planning Council (NCFRPC) Strategic Regional Policy Plan (SRPP). We commend the Council staff for the progress made toward incorporating the comments contained in the February 27, 1996, *State Report of Findings and Recommendations for the North Central Florida Regional Planning Council's Strategic Regional Policy Plan (State Report of Findings and Recommendations)*. However, several issues need to be considered by the NCFRPC prior to final plan adoption or through amendments to the plan after adoption. As we discussed in our telephone conversation on March 25, the following comments are provided to further clarify some of the findings presented in the *State Report of Findings and Recommendations*.

The trends and conditions statements (TCS) continue to lack the required background *analyses* of factors that describe current conditions and *projections* needed to provide an adequate basis/background and establish the region's need for each regional goal and policy as required by Section 186.507(3), *Florida Statutes*, and Sections 27E-5.002(11) and 27E-5.004(4), *Florida Administrative Code*. Specific examples include, **but are not limited to**, the following:

1. Policies 4.3.6., 4.4.6., 4.5.4., and 4.6.3. appear to be inconsistent with several comments contained in the associated TCS. The TCS indicates that further public land acquisition efforts would not be supported by several county governments in the north central Florida region due to the impact on the region's tax base and the large quantity of land currently in public ownership. The TCS does not provide any **discussion** and **analyses** of fee-simple acquisition or viable alternative acquisition methods such as less-than-fee simple acquisition, conservation easements, etc., in the north central Florida region. The TCS for the *Natural Resources* section must be amended to analyze the need for continued acquisition, the viability of alternative acquisition methods, and the impact upon county governments in the north central Florida region.

NCFRPC Response: Policies 4.3.6, 4.4.6, 4.5.4, and 4.6.3 have been temporarily deleted until such time as the Council is able to revise the TCS accordingly.

2. Policy 4.5.7., contained in the December 31, 1995, draft SRPP, addresses the voluntary implementation of “Green Line protection goals and objectives”. These protection “goals and objectives” are not identified or analyzed in the associated TCS. The TCS must be amended to provide a basis/background for the “Green Line protection goals and objectives” and establish the need for Policy 4.5.7.

NCFRPC Response: Policy 4.5.7 has been deleted.

3. To clarify Finding 17 in the *State Report of Findings and Recommendations*, the *Affordable Housing* section in the revised SRPP documents that a high percentage of the housing stock in the north central Florida region is comprised of mobile homes and that the reliance upon mobile homes is increasing. However, the *Emergency Management* section states that, although the region currently has adequate emergency shelter capacity through 2000, the increased reliance upon mobile homes could **dramatically increase** the number of households in need of shelter. Additionally, the revised plan does not contain goals or policies to address this regional issue. The TCSs must be amended to describe or establish why this is not identified as a problem, need or opportunity. Further, associated goals and policies must be included in the SRPP.

NCFRPC Response: Much of the difficulties noted by EOG are the result of the timing of Council receipt of the draft Cedar Key Basin Hurricane Evacuation Study, Technical Data Report. This study will replace the Council’s 1990 study. In order to eliminate inconsistencies and confusion, references to the Council’s 1990 study have been deleted from the TCS.

4. The TCSs contained in the revised SRPP do not provide **analyses** and **projections** for the following issues:
 - * premature deterioration and demolition of residential dwelling units;
 - * response times of regional hazardous materials response teams; or
 - * Potential adverse economic development impacts resulting from a loss of rail access to north central Florida communities.

The TCSs must be amended to provide analyses and projections for the issues identified above. Additionally, goals and policies must be included in the SRPP to address these issues.

NCFRPC Response: With regards to premature deterioration and demolition of residential dwelling units, Affordable Housing Problem, Need, and Opportunity #2 as well as Regional Goal 1.2 and its associated regional indicator and policies have been temporarily deleted until such time as the Council has the resources necessary to research the housing quality/maintenance issue.

With regards to response times of regional hazardous materials response teams, language has been added to the TCS stating the response times of regional hazardous materials response teams. Projected response times are unavailable. Projections of response times will be added to the plan at a later date when sufficient time and funding are available to the Council to prepare the requested projections.

With regards to potential adverse economic development impacts resulting from a loss of rail lines, The Council has no empirical data to support its concern regarding potential adverse impacts due to a loss of rail access. Therefore, railroad right-of-way and Amtrak stations have been deleted from the SRPP as regionally significant transportation facilities. Associated discussion of rail lines and Amtrak stations has also been deleted. Regional Goal 5.4 as well as its associated regional indicators and policies have been deleted from the SRPP. The Council will conduct a study of economic impacts resulting from the loss of rail access when sufficient time and funding are available to the Council to prepare such a study. When this study is completed, rail lines and Amtrak railroad stations, as well as associated goals and policies may be added to the SRPP, depending upon the findings of the Council study.

As you requested during our March 25 telephone conversation, the following comments are provided to clarify any misinterpretations that Council staff may have had regarding some of the findings and recommendations contained in the *State Report of Findings and Recommendations*.

5. The TCS contained in the *Economic Development* section states, on Page II-54 of the revised SRPP, that private-public sector cooperation is a **key to successful** downtown renovation projects in several communities in the region. However, this is not identified by the revised SRPP as an opportunity for the region. The *Economic Development* TCS must be amended to describe or establish why public-private sector cooperation is not a regional opportunity.

NCFRPC Response: The Economic Development TCS sentence located on page II-54, stating that private-public sector cooperation is a key to successful downtown renovation projects in several communities in the region, has been deleted.

6. The *State Report of Findings and Recommendations* established that the indicators identified for Goal 1.1 do not provide valid or appropriate measures. Indicators related to coastal weather buoys, NOAA weather radio transmissions, and emergency warning sirens measure only emergency **warning** and do not adequately measure the region's overall emergency **preparedness** for coastal storms. The plan must be amended to include indicators such as shelter capacity and evacuation clearance times in order that the overall regional preparedness for coastal storms may be more accurately measured.

NCFRPC Response: The requested regional indicators have been added to Goal 3.1 of the Emergency Preparedness element.

7. Revised Goal 4.6 has been amended by the NCFRPC staff to address the comments contained in the *State Report of Findings and Recommendations* and is improved over the original proposed goal. However, the goal is likely to be inconsistent with the State Comprehensive Plan (SCP) and does not provide adequate guidance to the region for resource protection because the terms “minimum level [of protection] necessary” and “amount and degree of protection” are not defined or explained in the revised SRPP. Additionally, regional agencies (i.e., water management districts) are omitted from the intent of the goal.

The SRPP must be amended to “set-up” Goal 4.6. Additionally, the SRPP must be amended to define, discuss and analyze the “minimum level [of protection] necessary” and the “amount and degree of protection” needed for resource protection. Additionally, as agreed in our telephone conversation, the goal will be amended to include “regional” agencies.

NCFRPC Response: Revised Goal 4.6 and its associated policies have amended as follows:

REGIONAL GOAL 4.6. Maintain the quantity and quality of the region’s surface water systems in recognition of their importance to the continued growth and development of the region. Recognizing their importance to the continued growth and development of the region, the quantity and quality of the region’s surface water systems should be maintained for future generations.

Regional Indicators

1. **In 1996, 1,103,340 acres of fresh water wetland were identified as a natural resource of regional significance in the North Central Florida Strategic Regional Policy Plan.**
2. **In 1996, 9 north central Florida lakes were identified as natural resources of regional significance in the North Central Florida Strategic Regional Policy Plan.**
3. **In 1996, 11 river corridors were designated as natural resources of regional significance in the North Central Florida Strategic Regional Policy Plan.**
4. **In 1996, 210,290 acres of river corridor were designated as natural resources of regional significance in the North Central Florida Strategic Regional Policy Plan.**
5. **In 1996, 50 springs were designated as natural resources of regional significance in the North Central Florida Strategic Regional Policy Plan.**

~~Policy 4.6.1. Encourage state and local regulatory agencies to p~~ Pursue an regulatory environment consisting of the minimum regulatory burden necessary for the maintenance of the quantity and high quality of the region's surface water systems.

Policy 4.6.2. Provide technical assistance to local governments in the development and implementation of appropriate local government comprehensive plan policies and land development regulations necessary to maintaining the quantity and high quality of the region's surface water systems.

~~Policy 4.6.3. Where appropriate, encourage the public acquisition of all or those portions of the region's surface water systems, including land areas adjacent to or impacting on the systems, where the minimum regulations necessary to maintain their quantity or high quality are so great as to constitute a taking of private property without compensation.~~

~~Policy 4.6.4. Support the efforts of the Suwannee River and St. Johns River Water Management Districts to c~~ **Continue their mapping of river floodplains.**

Policy 4.6.4. Update the regional map series delineating river floodplains as this information becomes available.

Policy 4.6.5. Work with north central Florida local governments to standardize on a common source for wetland maps contained in local government comprehensive plans.

~~Policy 4.6.6. Support the water management district's u~~ **Use of non-structural water management controls as the preferred water management approach for rivers, lakes, springs, and fresh water wetlands identified as natural resources of regional significance.**

Policy 4.6.7. Support the coordination of land use and water resources planning for surface water resources designated as natural resources of regional significance among the council, local governments, and the water management districts through regional review responsibilities, participation in committees and study groups, and ongoing communication.

Policy 4.6.8. Assist in environmental education efforts to increase public awareness of the region's surface water systems through the North Central Florida Tourism Task Force.

~~Policy 4.6.9. Encourage and assist the Florida Game and Fresh Water Fish Commission, the Florida Department of Environmental Protection, and local governments to e~~ **Establish and enforce consistent boating safety zones along the Suwannee and Santa Fe rivers.**

Policy 4.6.10. Assist local governments in establishing consistent regulations for development projects within river corridors identified as natural resources of regional significance.

~~Policy 4.6.11. Support the coordinated review of local plan amendments and development projects within the Alapaha River Corridor, Ichetucknee River Corridor, Santa Fe River Corridor, Suwannee River Corridor, and Withlacoochee River Corridor.~~

~~Policy 4.6.11. Encourage the Florida Department of Environmental Protection and the local water management districts to~~ **Identify and map the capture zones of all springs identified as natural resources of regional significance. Once delineated, the council will provide technical assistance to local governments in implementing spring protection programs based upon capture zones.**

Policy 4.6.12. Provide technical assistance to local governments in obtaining grants to establish centralized sewer systems in identified septic tank problem areas.

Policy 4.6.13. Ensure that local government comprehensive plans, DRIs, and requests for federal and state funds for development activities reviewed by the council include adequate provisions for stormwater management, including retrofit programs for known surface water runoff problem areas, and aquifer recharge protection in order to protect the quality and quantity of water contained in the Floridan Aquifer and surface water systems identified as natural resources of regional significance.

Policy 4.6.14. Work with local governments, state and federal agencies, and the local water management districts in the review of local government comprehensive plans and developments of regional impact as they affect wetlands identified as natural resources of regional significance to ensure that any potential adverse impacts created by the proposed activities on the natural functions of wetlands are minimized to the greatest extent possible.

Policy 4.6.15. Minimize the effect of mining on the surface water quality and seasonal flows of surface waters identified as natural resources of regional significance.

~~Policy 4.6.16. Support the coordination of land use and water resources planning for surface water systems identified as natural resources of regional significance among the council, local governments, and the water management districts through regional review responsibilities, participation in committees and study groups, and ongoing communication.~~

8. As agreed in the conference call, the qualifier “currently” will be deleted from Goal 4.5. in the revised SRPP, relating to endangered, threatened, or species of special concern.

NCFRPC Response: The word “currently” has been deleted from Regional Goal 4.5.

9. A new *Problems, Needs and Opportunities* component has been added to each section of the revised SRPP. The TCSs included in the revised SRPP do not discuss the process used by the NCFRPC to identify and address the significant problems, needs and opportunities now included in the plan. The SRPP must be revised to clearly identify how the problems, needs and opportunities are identified by the Council.

NCFRPC Response: The SRPP Introduction has been amended to address the process by which regional problems, needs, and opportunities are determined.

10. To repeat a comment in the *State Report of Findings and Recommendations*, the Council may wish to pursue implementing a SRPP amendment process that would facilitate the incorporation of meaningful regional guidance from new legislation, future revisions to the SCP, updated data and information, and the findings and recommendations of other current planning activities and programs.

NCFRPC Response: The Council will update the SRPP to reflect new legislation, future revisions to the SCP, updated data and information, and the findings and recommendations of other current planning activities and programs.

We appreciate the work that the NCFRPC staff has put into responding to the *State Report of Findings and Recommendations* and will continue to work with the NCFRPC to further improve the SRPP. We request that you provide OPB and the other reviewing agencies with a copy of future drafts and amendments to your region's revised SRPP as well as a copy of the plan at the time your notice of proposed rulemaking is published. If you have any questions regarding the *State Report of Findings and Recommendations* and/or this letter, please call me at (904) 488-7793 or S/C 278-7793.

Sincerely,

Paul A. Carlson

cc: Robert B. Bradley
Teresa Tinker
Chuck Kiester
Steve Dopp
All SRPP Reviewing Agencies

**STATE REPORT OF FINDINGS AND RECOMMENDATIONS
FOR THE PROPOSED AMENDMENTS TO THE NORTH CENTRAL FLORIDA
STRATEGIC REGIONAL POLICY PLAN**

August 22, 1997

Introduction

The Governor's Office, in coordination with various state, regional and local government entities, and the public, has completed its review of the proposed amendments to the adopted strategic regional policy plan (SRPP) for the north central Florida region in accordance with sections 186.507 and 186.508, Florida Statutes, and Rule 27E-5, Florida Administrative Code. The state's review included a substantive analysis of the proposed amendments, including their consistency with Chapter 187, Florida Statutes (State Comprehensive Plan), Chapter 186, Florida Statutes, other pertinent statutes and rules, including Rule 27E-5, Florida Administrative Code.

The following first restates and then responds to the comments and recommendations made by the Governor's Office, including comments received by the Governor's Office from other state and local agencies, and the public. In many cases, Council staff has paraphrased the referenced comment/recommendation for purposes of brevity.

Comments/Recommendations From the Executive Office of the Governor (EOG)

EOG Comment/Recommendation #1

Add a policy which directs, at a minimum, detailed surveys and/or specific site assessments for listed plant and animal species and habitat, as required by section 9J-2.041, Florida Administrative Code, for developments undergoing regional review as a Development of Regional Impact to evaluate the impacts of such developments.

NCFRPC Response

Concur. A new policy is proposed to be added to the draft SRPP amendments which reads as follows:

Policy 4.4.10. Detailed surveys and/or specific site assessments for listed plant and animal species, as well as habitat used by listed species shall be conducted in accordance with Rule 9J-2.041, Florida Administrative Code, for developments undergoing regional review as a Development of Regional Impact in order to evaluate the impacts of such developments on said species and habitats.

EOG Comment/Recommendation #2

Appendix E of the proposed amendment contains data and information regarding habitat obtained from the Florida Committee on Rare and Endangered Plants and Animals, Rare and Endangered Biota of Florida. Sources such as Guide to the Natural Communities of Florida, produced by FNAI in 1990, Closing the Gaps in Florida's Wildlife Habitat Conservation Systems, and Mapping Wetland Habitats of High Priority to Endangered and Threatened Species in Florida, both of which were produced by the Florida Game and Fresh Water Fish Commission in 1994, contain important information relating to listed species and their habitats and are available for use by the council to supplement the listed species identification and habitat descriptions contained in this amendment. we strongly encourage the RPC to include these additional data sources and publications in your library to make available to local governments and citizens in the region.

NCFRPC Response

Concur. It is proposed that the Council add these items to its library.

Comments from Florida Department of Community Affairs (DCA)

DCA Comment/Recommendation #1

Rule 9J-2.041 for DRIs states that regionally significant habitat occurs for a listed species "whenever an important area of its habitat is documented to occur." Utilization of FNAI occurrence data is a first step towards documenting and mapping habitat, particularly for areas for which no surveys or site assessments have been conducted. Therefore, it is important, at a minimum, to include a policy which specifically requires developments undergoing regional review as Developments of Regional Impact to conduct detailed surveys and/or specific site assessments of listed plant species and wildlife habitat in order to evaluate the impacts of such developments on these species and their habitat (as required by Rule 9J-2.041, F.A.C.). The SRPP should also include a policy which recognizes and incorporates into the SRPP more detailed habitat mapping as reliable listed species habitat information becomes available as the result of DRI-related surveys and/or other specific site assessments (e.g., "Describe and map in the SRPP wildlife habitat as it becomes available from site surveys and other assessments, such as those associated with DRI reviews").

NCFRPC Response

Concur. See Council response to EOG comments 1 and 2

DCA Comment/Recommendation #2

The list of listed species is incomplete, as it does not include several state listed plant species which are currently in the Florida Natural Areas Inventory database for this region... Include the following plant species in Table 4.4.: Green Adder's-Mouth (*Malaxis unifolia*), Southern Lip Fern (*Cheilanthes microphylla*), Sinkhole Fern (*Blechnum occidentale*), and Autumn Coralroot (*Corallorhiza odontorhiza*).

NCFRPC Response

Concur. It is proposed that these species be added to Table 4.4.

DCA Comment/Recommendation #3

The two paragraphs describing the requirements of Rule 9J-5.0-15(4) for local government comprehensive plans to identify in their Intergovernmental Coordination Elements all natural resources of regional significance listed in the relevant SRPP is outdated and not relevant. The DCA, pursuant to changes made by the Florida Legislature made to Chapter 163, F.S., as recommended by the ICE Technical Committee in their December 1995 report, will soon eliminate that section of Rule 9J-5 (s.9J-5.015(4), F.A.C.) which requires local government comprehensive plans to identify in their Intergovernmental Coordination Elements all natural resources of regional significance listed in the relevant SRPP and establish a process to determine if development proposals would have significant impacts on other local governments or state or regional resources or facilities in the applicable state or regional plan and what measures would be necessary to mitigate these impacts.

NCFRPC Response

Concur. These two paragraphs are proposed to be deleted.

DCA Comment/Recommendation #4

Habitat descriptions for the four listed species discussed in DCA Comment/Recommendation #2 should be added to appendix E.

NCFRPC Response

Concur

DCA Comment/Recommendation #5

This set of comments/recommendations consists of a series of typographical errors and minor suggestions which bear no impact on the substance of the plan.

NCFRPC Response

Concur

Comments/Recommendations From the Florida Game and Fresh Water Fish Commission (GFWFC)

GFWFC Comment/Recommendation #1

The proposed amendment is unlikely to result in protecting these listed species and habitat due to limited local government and Council staff expertise. Include Strategic Habitat Conservation Area maps as well as the Commission's wetland maps as Natural Resources of Regional Significance in the SRPP. These maps make it easy for local and regional staff to determine areas where additional information/protection measures are necessary to protect listed species and their habitats.

NCFRPC Response

Do not concur. This request is not in accordance with the recommendations of the Task Force which specifically rejected including the Strategic Habitat Conservation Area maps.

Comments From the St. Johns River Water Management District (SJRWMD)

SJRWMD Comment #1

For locating listed species habitat, the descriptions added in Appendix E are not sufficient for people who are unable to identify the various plant communities. Including habitat in the NRRS map series would make the SRPP more useful to local governments, particularly the smaller ones with limited staff capabilities, as well as citizens and other users of the plan.... We recommend that a policy be included stating that GFC, FNAI, WMD, and any other best available information should be used in conjunction with the element occurrence map and the habitat descriptions in Appendix E whenever a future land use change or development order is under consideration.

NCFRPC Response

Do not concur. See response to GFWFC comment/recommendation above. Omission of habitat and other maps from the SRPP does not preclude the use of such maps in the review of impacts to listed species and their habitats by local governments in the review of specific development proposals.

Comments From the Florida Natural Areas Inventory (FNAI)

FNAI Comment/Recommendation #1

P xvii, footnote 5: Palaemonetes cummngi, the Squirrel Chimney Cave shrimp is federally listed LT and not state listed. The definition of listed species should also include those that are federally listed. The same is true for P IV-1, Footnote 59.

NCFRPC Response

Concur. The definition of listed species currently included in the SRPP glossary includes both state and federally listed species.

FNAI Comment/Recommendation #2

P IV-20, Table 4.4: The title should read “State and Federally Listed Species Known to Occur in the North Central Florida Regional Planning Council Area Identified in the FNAI Element Occurrence Database.” The region is identified on strictly political boundaries and the area has never been thoroughly surveyed to identify all possibly occurring species.

NCFRPC Response

Concur

FNAI Comment/Recommendation #3

The table is very poorly organized and difficult to read. Species should be grouped by class, not alphabetically by common name. At the very least, animals and plants should be grouped with each other. If the table is to be kept in this format, a heavy line should be drawn to distinguish the appropriate columns.

NCFRPC Response

Do not concur. Species are listed in alphabetical order by common name because most people using the SRPP are not trained as biologists/botanists who would be familiar with scientific names/classes. The current method of organization should make the document easier to use by the widest cross-section of citizens in the region.

FNAI Comment/Recommendation #4

Calydorea (Lillium) catesbaei, Bartram's *Ixia*, has recently been removed from the FNAI list since it is so common and, therefore, should not be included in this table.

NCFRPC Response

Do not concur. Bartram's *Ixia* is still included in the latest version of the Official Lists of Endangered and Potentially Endangered Fauna and Flora in Florida. When the specie is removed from this publication, we will propose removing the specie from Table 4.4.

FNAI Comment/Recommendation #5

Blechnum occidentale, Sinkhole Fern; *Cheilanthes micropylla*, Southern Lip Fern; *Corallorhiza odontorhiza*, Common Coralroot; and *Malaxis unifolia*, Pondspice are listed by FNAI and not included in the table.

NCFRPC Response

Concur. It is proposed that these species be added to Table 4.4.

FNAI Comment/Recommendation #6

If *Pandion haliaetus* is only state listed in Monroe County and if the criteria is that the species should be state listed in the North Central Florida RPC area then it should not be included in this table.

NCFRPC Response

Concur

FNAI Comment/Recommendation #7

There are a number of spelling and case errors in this table which I have corrected and attached. Since this table sites FNAI, the common names used by FNAI should be followed. This should also correlate with the FCREPA common names.

NCFRPC Response

Concur. The common names listed in Table 4.4 are from the latest edition of the Official Lists of Endangered and Potentially Endangered Fauna and Flora in Florida, which differ in some cases from the common names used by FNAI and FCREPA; however, the table is proposed to be changed to provide the common names used by FNAI and FCREPA in addition to those used in the Official Lists.

FNAI Comment/Recommendation #8

Page IV-20: The various volumes of the Rare and Endangered Biota of Florida have been published at various times. The plant volume was published nearly 20 years ago. Since this information is so dated, there may be new discoveries as far as identifying different types of habitats that species may occur in. The Florida Natural Areas Inventory “Guide to the Natural Communities of Florida”, 1990, has extensive descriptions of the components of each of the 81 community types. Also there are lists of species occurrences by habitat in the 1997 FNAI Statewide Matrix. This information should be incorporated into the plan or at least reference should be made to it.

NCFRPC Response

Do not concur. The Task Force specifically agreed to use the habitat descriptions contained in Rare and Endangered Biota of Florida as recommended by the GFWFC.

FNAI Comment/Recommendation #9

Page IV-22, Table 4.5: This list from the Florida Game and Fish Commission should be at least on the same page with the other species information and preferably in the same table with appropriate acknowledgments. FNAI also provided information on the seaside sparrow, manatee, and Atlantic ridley turtle although they are not included in Table 4.4.

NCFRPC Response

Concur to adding information on the Seaside Sparrow, Manatee and Atlantic Ridley Turtle. Do not concur on tables reformatting request since the source of information contained in Table 4.5 is different from that for information contained in Table 4.4.

FNAI Comment/Recommendation #10

The Wakulla seaside sparrow is no longer a taxonomic entity. It has been grouped with the Scott’s seaside sparrow *Ammodramus maritimus peninsulae*.

NCFRPC Response

Do not concur. The Wakulla Seaside Sparrow is still included in the latest version of the Official Lists of Endangered and Potentially Endangered Fauna and Flora in Florida. When the specie is removed from this publication, we will propose removing the specie from Table 4.4.

FNAI Comment/Recommendation #11

Page IV-22: “Planning and Resource Management areas can more accurately be thought of as natural resource designations rather than natural resources per se.” What does this mean? This is totally meaningless to me yet it sounds as though it was a significant designation. This needs to be explained so that the reader will have some idea of the meaning behind it.

NCFRPC Response

Do not concur. The regional plan draws a distinction between a resource and a resource designation. For example, the Big Bend Seagrass Bed is a resource. The Big Bend Seagrass Bed *Aquatic Preserve* is a resource designation. In another example, The Suwannee River is a resource; however, the designation of the river as a Surface Water Improvement Management water body is a resource designation, the boundaries of which may be different from that of the river per se. Planning and Resource Management Area maps delineate resource area designations which may not necessarily be the same as the underlying natural resource. Council staff believes that the concept becomes apparent when reviewing the natural resources of regional significance so identified under this category on pages IV-21 through IV-27 of the regional plan; therefore, no changes as a result of this comment are proposed at this time.

FNAI Comment/Recommendation #12

It needs to be made clear in the legend of the map depicting FNAI species occurrences that these are only occurrences that have been recorded in the FNAI database. A blank portion of this map does not indicate that there is not a species occurrence. It may be that we have no information on this area.

NCFRPC Response

Concur. It is proposed that the following sentence be added to the second paragraph on page IV-3:

Additionally, the number and location of occurrences of listed species can change over time as new locations of listed species are discovered.

Comments/Recommendations From the Florida Forestry Association (FFA)

FFA Comment #1

Our Association has been very concerned about the implications for future forest management activities on private lands designated on RPC maps as “regionally significant wildlife habitat.” We are therefore considerably more comfortable with the approach used in the proposed amendment, which is based on known *occurrences* of listed species rather than the “broad-brush” *habitat* mapping previously considered.

Council Response

None

Comments/Recommendations From the Sierra Club (SC)

SC Comment/Recommendation #1

To remove habitat from the Natural Resources of Regional Significance is inconsistent with the statement in the Trends and Conditions, page IV-1, “Both private and public lands provide important habitats for the survival of native plant and animal species.”

Council Response

Do not concur. Habitat is not proposed to be removed from the plan. The currently adopted version of the North Central Florida Strategic Regional Policy Plan does not include a habitat map. The proposed amendment merely replaces the term “regionally significant habitat” with the term “Listed species and their *habitats*” in Table 4.1, adds a map of the locations of known occurrences of listed species, and also adds descriptive text of habitats used by listed species.

SC Comment/Recommendation #2

Missing from the listed species is the Sims Sink crayfish. Other listed species which have been ignored are all federally listed species in the north central Florida region. The southeastern bat has significant terrestrial caves in three counties, which also shelter many other species and are especially vulnerable to human development.

Council Response

Concur to adding the Sims Sink Crayfish. Do not concur to comment regarding all federally-listed species. The Council has not ignored all federally-listed species. Proposed Tables 4.4 and 4.5 in the amendment package include federally-listed species.

SC Comment/Recommendation #3

Although there are no identified SWIM water bodies in the region, the plan overlooks the Orange Creek Basin project which has received special attention from the Governor's office and funding from state agencies. This project, which has a special management strategy and appointed citizens and scientific committees, should be recognized for the unique watershed approach to natural resource management.

Council Response

Do not concur. All SWIM water bodies are recognized as natural resources of regional significance and are listed in Table 4.1. As noted on page IV-20 of the currently adopted regional plan, the Suwannee River Water Management District has identified 18 north central Florida water bodies as priority waters to be addressed through SWIM. On the other hand, no north central Florida water bodies are included in the St. Johns River Water Management District SWIM priority list within which district Orange Creek Basin is located. Council staff are currently attempting to obtain information on the Orange Creek Basin project as suggested.

SC Comment/Recommendation #4

The descriptions of habitat provided by the Rare and Endangered Biota of Florida are so generalized that they provide no guidance for the location of specific habitat types. Consider this generic description from the manatee habitat: "access to vascular plants, freshwater sources...Sheltered bays, coves, and canals..." A local planner will be left with two options when faced with land-use changes. The first is to consider every *freshwater source, sheltered bay or deep canal* as possible habitat and require wildlife surveys to ascertain the existence of the listed species and their habitat. The second is to throw up his hands in despair at the impossibility of determining where important habitat exists. We find it difficult to accept that local governments will require wildlife surveys on all likely habitats and consequently the proper planning to protect habitat will be abandoned.

Council Response

Do not concur. The regional plan does not limit local governments to the use of the maps supplied in the regional plan. There is nothing in the regional plan which prevents the local planner from using Strategic Habitat Conservation Area maps as published by the Florida Game and Fresh Water Fish Commission or any other information source for identifying listed species habitat.

**ALACHUA COUNTY DEPARTMENT OF GROWTH MANAGEMENT
COMMENTS ON THE DRAFT EAR-BASED SRPP AMENDMENTS**

February 21, 2002

Alachua County Comment/Recommendation #1

Affordable Housing Element, page I-18, Policy 1.1.8. Encouraging use of East Central Florida Housing Methodology in lieu of the adequate affordable housing standard rule 9J-2.048 for determination of affordable housing in DRIs requires further review by County staff before a decision can be made as to whether Alachua County will use this alternative methodology.

NCFRPC Response

No action recommended. The comment does not request a change to the regional plan.

Alachua County Comment/Recommendation #2

Emergency Preparedness Element, page III-3, paragraph 3, line 6 mentions 95 EM agencies. The actual number is 140 terminals statewide.

NCFRPC Response

Concur. Council staff proposes to delete the number from the text as it does not provide information necessary to understand the point of the sentence. The sentence is proposed to read as follows:

A sophisticated satellite-based communications system ~~is **has replacing replaced it, The new system will**~~ linking **95** emergency management agencies throughout the state to provide high-speed data, facsimile, and video communications capacities.

Alachua County Comment/Recommendation #3

Emergency Preparedness Element, page III-4, paragraph 4. FYI - Paragraph speaks to storm surge. Inland flooding has killed more people than storm surge. This may be an item to address in the EAR in the future.

NCFRPC Response

No action recommended. The comment does not request a change to the regional plan.

Alachua County Comment/Recommendation #4

Emergency Preparedness Element, page III-7. Table 3.2 is incorrect. The host capacity for Alachua County is 8,897, the Risk Capacity ARC 4496 Compliant at UF is 3,057 and the Risk Capacity ARC 4496 Non-Compliant is 11,512. Our numbers were submitted to DCA prior to the published date.

NCFRPC Response

No action recommended. Council staff reviewed its source material for the table and found the numbers as presented in the table to be correct. The information was supplied to the Council by the Florida Department of Community Affairs, January 3, 2000. The regional plan seeks to use the same age of information for all north central Florida counties. This is important for monitoring change over time. We will update the table to reflect newer information during the next EAR amendment cycle.

Alachua County Comment/Recommendation #5

Page III-9, paragraph 1, line 5. The word affordable is not entirely correct. NFIP is the only flood insurance available (affordable or not).

NCFRPC Response

Concur. Council staff proposes to strike the word “affordable” from the sentence.

Alachua County Comment/Recommendation #6

Page III-10. What is a NOAA radio station? Alachua County is home to a NOAA radio Transmitter operated by the National Weather Service Office of Jacksonville. Clarify if NOAA station. The Gainesville Fire Rescue Hazardous Materials Team is a resource, not a facility. PCS, Inc., has been renamed to Clariant. Recommend adding the County Emergency Operations Centers to the list.

NCFRPC Response

No action recommended. For purposes of the North Central Florida Strategic Regional Policy Plan, a NOAA radio station is a radio-wave emitting device or structure, manned or unmanned, which broadcasts weather information from the National Weather Service. It should be noted that the NOAA, at least in one publication, has used the terms “station” and “transmitter” interchangeably. The reader is referred to <http://205.156.54.206/nwr/flframes.html> and <http://205.156.54.206/nwr/listcov.htm>.

No action recommended. For purposes of the North Central Florida Strategic Regional Policy Plan, the Gainesville Fire Rescue Hazardous Materials Team is identified as a regional facility.

No action recommended. To the best of our knowledge, the Potash Corporation of Saskatchewan (PCS) mining operation in Hamilton County has not been renamed to Clariant.

Concur. Council staff proposes to add the Alachua County Emergency Operations Center to Table 3.3, Regionally Significant Emergency Preparedness Facilities.

Alachua County Comment/Recommendation #7

Page III-11, paragraph 2. FYI - Un 1995 the LEPC was under contract to determine facilities with the potential to cause regional impact. The number 20 was a contract number. Recommend contacting the LEPC about current status.

NCFRPC Response

Concur. Council staff proposes the following changes to pages 10 through 12 of the Emergency Preparedness Element Conditions and Trends Statement:

HAZARDOUS MATERIALS RELEASES

Under contract with the Florida Department of Community Affairs, the North Central Florida Regional Planning Council serves as staff to the North Central Florida Local Emergency Planning Committee (LEPC). The LEPC was established in 1988 in response to the federal Emergency Planning and Community Right-to-Know Act (EPCRA) which requires the preparation of local emergency response plans for hazardous materials releases which, for the State of Florida, have been developed utilizing the eleven regional planning council districts.¹ The North Central Florida LEPC is composed of representatives of 17 different occupational categories. Membership is also distributed geographically to assure that each of the region's eleven counties has at least one resident serving as a member of the LEPC. Committee members are appointed by the State Emergency Response Committee.

The local emergency response plan for north central Florida was adopted by the Committee on June 9, 1989, and ~~last updated on May 19, 1995~~ **is updated annually**. The LEPC emergency response plan identifies locations of possible hazardous materials releases based upon known locations of hazardous materials. The plan also delineates vulnerable zones.²

¹Although referred to as a local plan, it is, in fact, a regional plan which addresses all eleven north central Florida counties.

²Vulnerable zones are areas where the estimated chemical concentration from an accidental release is at a level where people's health could be adversely impacted during a worst-case release.

In addition to the emergency response plan, the LEPC is also involved in establishing training programs, conducting emergency response exercises, providing public information campaigns, and other activities aimed at minimizing risks from hazardous materials releases. ~~The LEPC recently completed a study which identifies 20 facilities with the potential of causing regional impacts should a worst-case hazardous materials release occur.³ A facility is considered regional if a release at its location could affect multiple jurisdictions or if the quantity of hazardous materials requires more resources than are locally available. After identification, the LEPC helps coordinate the development and review of response guidelines between the regional facility and responders.~~

~~The methodology developed by the Council in conducting the enhanced analysis could be used to update the 11 individual county emergency management plans to include all north central Florida facilities with a likelihood of causing regional impacts should a hazardous materials release occur. In addition to serving as staff to the LEPC, the Council provides technical assistance to local governments in developing county-level hazardous materials emergency response plans. Between 1989 and 1995, the Council assisted ten of the region's eleven counties in developing either their original plans or revisions to their plans. The Council continues to make this technical assistance available to requesting local governments.~~

While the LEPC and county hazardous materials emergency response plans have a good understanding of what stationary facilities have in terms of hazardous materials, little is known about hazardous materials moving down roads and railroads in the region. In 2002, the LEPC has not conducted a will begin a commodity flow study of the region's roads, pipelines, and railroads. Given the rural nature of north central Florida and the large populations located south of the region, it is likely that the biggest hazardous materials emergencies involving unknown chemicals could result from releases from trucks and trains passing through the region.

When a hazardous materials release occurs, a local fire department or other local government personnel arrive at the scene and determine if local resources can deal with the release. If the incident requires greater than local resources, the local government contacts one of the region's two regional response teams. One of the response teams is run by the City of Gainesville Fire Department while the other is operated by PCS in Hamilton County.

The LEPC has adopted a needs assessment for additional regional response teams to assure a timely response to hazardous materials spills in the western portion of the region. For example, the LEPC has determined that the worst-case hazardous materials accident in Taylor County is the release of chlorine in the City of Perry as the result of a railroad accident. Currently, such a spill is likely to result in a telephone call to either the Tallahassee Fire Department, the PCS emergency response team, or the Gainesville Fire Department. Tallahassee is the closest response team to Taylor County. Nevertheless, the LEPC has determined that the response time of even the closest

³North Central Florida Regional Planning Council, Enhanced Hazards Analyses, North Central Florida Local Emergency Planning Committee, Gainesville, FL, 1994.

emergency response unit, the Tallahassee Fire Department, is too great to adequately protect the public from the release of chlorine gas from a rail car. The LEPC needs assessment notes that response times are 60 minutes or less to hazardous materials accidents in every community within the region except for Perry, Cross City, and Greenville where response times are over one hour. The needs assessment also notes that adequate response times in metropolitan areas is generally considered to be 30 minutes. Given the high costs associated with maintaining hazardous materials response times and the rural nature of the region, the assessment establishes a goal of providing a 60 minute response to hazardous materials accidents.⁴

As noted earlier, the Council staff assists the LEPC in staging hazardous materials emergency response exercises to test the effectiveness of the plans and to provide valuable training to emergency response teams. The LEPC ~~and Madison County plans were was~~ tested ~~on April 9, 1994 during a December, 2001, with a full-scale~~ hazardous materials exercise. ~~The scenario involved a gasoline truck hitting a train hauling phosphoric acid and anhydrous ammonia.~~ Local responders gained valuable experience from the exercise. ~~The Valdosta, Georgia, Fire Department hazardous materials response team crossed the state line to participate in the exercise. Also, in 1994, 35 classes were held training 671 fire fighters, law enforcement, and medical personnel. Also, free hazardous materials emergency response training classes are sponsored by the LEPC for first responders including firefighters, law enforcement, emergency medical, and public works personnel. Over 3,700 people have been trained since 1995.~~ Most of the training ~~was is~~ at the awareness-level, in which first responders are trained to recognize, identify, and make the proper notifications for possible hazardous materials incidents.

The LEPC is actively working to reduce the risks associated with hazardous materials ~~to the community as well as to first responders.~~ To assist the regulated community, the LEPC has notified over ~~2,000 2,800~~ facilities of their potential reporting requirements. The LEPC ~~has~~ also ~~provided provides~~ technical assistance to help these facilities comply with the reporting requirements of EPCRA. ~~The LEPC is also implementing a program to inform the public about its "right-to-know." It has held four "How-to-Comply" seminars. In both 1989 and 1991, seminars were conducted in Gainesville and Live Oak. Over 2,000 businesses and government agencies were invited with over 200 persons attending. The LEPC has also compiled a library of information about the program and subject facilities located in the region.~~

⁴For more information regarding the need for an additional regional emergency response team in Perry, see North Central Florida Local Emergency Planning Committee, Needs Assessment for Additional Hazardous Materials Emergency Response Teams, Training, and Equipment in North Central Florida, North Central Florida Regional Planning Council, Gainesville, Fl, November 17, 1995.

Alachua County Comment/Recommendation #8

Page III-11, paragraph 5. PCS in Hamilton County scaled down operations approximately 6 months ago. Their response team capability is in question.

NCFRPC Response

No action recommended. The PCS, Inc., Chemical Emergency Response Team is still listed in the latest version of the North Central Florida Local Emergency Planning Committee Hazardous Materials Spill Prevention and Emergency Response Plan. While PCS has experienced significant employee layoffs, they may recover. Council staff will monitor the team and may remove it from the Table during the next EAR-based amendment cycle.

Alachua County Comment/Recommendation #9

Page III-14, paragraph 1, line 2. Delete sixteen, the actual number is seventeen. It is named Animal Services.

NCFRPC Response

Concur. Council staff proposes to change 16 to 17, and to add Animal Services to the paragraph as noted below:

County CEMPs are no longer required to develop or maintain nuclear attack civil protection plans. Each county CEMP is required to address the following ~~sixteen~~ 17 emergency support functions: **animal services**, communications, energy, fire fighting, food and water, hazardous materials, health and medical services, information and planning, law enforcement and security, mass care, military support, public works and engineering, public information, resource support, transportation, search and rescue, and volunteers and donations. County CEMPs are ~~to be~~ submitted to the Florida Department of Community Affairs for compliance review.

Alachua County Comment/Recommendation #10

Page IV-63, item #13. Alachua County supports sustainability concept in this need statement. Requiring BMPs and or forestry certification would give additional support to (this) general statement.

NCFRPC Response

Concur. Council staff recommends amending Problems, Needs, and Opportunities item #13 as follows:

A need exists to balance environmental concerns with existing needs for raw materials by industry. The survival of the timber industry is very important to the region as it provides the reason to own and protect much of what is identified in this plan as a Natural Resource of Regional Significance. **The use of BMPs is important to the sustainability of forests.**

Alachua County Comment/Recommendation #11

Page IV-72, Regional Indicator #17. Include mention of 23 needed stormwater retrofit/stormwater management projects in discussion of flooding in Section III.

NCFRPC Response

No action recommended. The regional indicator identifies 23 north central Florida communities in need of stormwater retrofit projects and/or stormwater management plans. In fact, the number of needed projects and plans exceeds 23, as some jurisdictions need multiple projects. The projects strike Council staff as most appropriately addressed under surfacewater quality. Council staff refers the reader to page IV-39, paragraph 2, which discusses the regional indicator.

Alachua County Comment/Recommendation #12

The NCFRPC SRPP Evaluation and Appraisal Report (December 2000) notes that Regional Policy 4.3.1 calls for coordination between water management districts in the mapping of high aquifer recharge areas to prevent map inconsistencies near District boundaries, but this has not been implemented to date. Alachua County is bisected by the St. John's River and the Suwannee River Water Management Districts. Each district has used different methodologies and assumptions in preparing the maps of high aquifer recharge areas. The regional planning council report states that a threat of a lawsuit could result if a map beyond the jurisdictional limits of the St. Johns River Water Management District is applied county-wide. Alachua County staff have some technical concerns with the SRWMD mapping model as well. As noted by Sloan and Chandwani (ASCE, 1997, p. 12) some of the dangers in groundwater modeling include misconceptualization of the physical system, over-simplification, over-calibration, misapplication of the code, and unrealistic expectations.

NCFRPC Response

No action recommended. The comment does not request a change to the regional plan. For purposes of clarification, the North Central Florida Evaluation and Appraisal Report does not state that a lawsuit could result if a map beyond the jurisdictional limits of the St. Johns River Water Management District is applied countywide. Rather, it notes that one Alachua County municipality, which is located within the Suwannee River Water Management District, chose to include the Suwannee River Water Management District's recharge map in its local government comprehensive plan rather than the St. Johns River Water Management District recharge map due to concerns the local government had regarding the legalities of reliance on a map beyond the jurisdictional limits of the St. Johns River Water Management District. It is Council staff's understanding that the concern was theoretical in nature and that no specific entity had threatened the municipality with a lawsuit over the use of the St. Johns map.

Alachua County Comment/Recommendation #13

Page V-24, Table 5.8.5. This information is dated and doesn't account for the scheduled improvements for several of these segments which will change the operating LOS upon completion.

I-75 from SR 24 to SR 26 is at 85% capacity;
SR 26 from Newberry to SW 154th Ave (GMA) is at 32%;
SR 26A is in the City of Gainesville's jurisdiction;
SR 24 from Archer to GMA is 85%.
They are not operating below their adopted LOS.

NCFRPC Response

Partially concur. Council staff agrees that the information is dated. It is based upon the best available information available to the Council at the time of preparation (July, 2000) of that portion of the Council's evaluation and appraisal report addressing the Regional Transportation Element. The table will be updated to reflect newer information during the next EAR amendment cycle. Council staff will recommend changing the jurisdiction of SR 26A to the City of Gainesville. Further, Council staff review of the source material concurs that I-75 from SR 26 to SR 24, SR 26 from Newberry to SW 154th Ave, and SR 24 from Archer to the GMA are not operating below the minimum adopted service standard and will recommend that these segments be deleted from the table. Alachua County staff is correct in the statement that the table does not take into account scheduled improvements which will change the operating LOS for several of these road segments. This issue is addressed in Table 5.10, however.

Alachua County Comment/Recommendation #14

Page V-28, Table 5.9. SR 26 from Newberry City Limits to GMA is projected to perform at LOS A until 2015 as per the FDOT LOS Summary Report (June 2001).

NCFRPC Response

Concur. Council staff recommends this segment be struck from the table.

Alachua County Comment/Recommendation #15

Pages V-14 through V-29. Check table numbering/sequence on multiple tables.

NCFRPC Response

Concur. Council staff will renumber these tables accordingly.

Alachua County Comment/Recommendation #16

Page V-34, paragraph 3. Typographical error, date of UF campus master plan is 2001.

NCFRPC Response

No action recommended. The paragraph correctly identifies the date of the draft campus master plan as 2001.