

**THE CITY OF KEY WEST  
PLANNING BOARD  
Staff Report**



**To:** Chairman and Planning Board Members

**From:** Donald Leland Craig, AICP Consulting Planner

**Through:** Thaddeus Cohen, Planning Director

**Meeting Date:** October 15, 2015

**Request:** Approve a resolution recommending approval of amendments to the City Comprehensive Plan to incorporate Policies, which implement the Water Supply Work Plan

**Applicant:** Jim Scholl, City Manager

**Property Owner:** Not Applicable

**Location:** City Wide

**Zoning and Comprehensive Plan Designation:**  
Applies to all FLUM and Zoning Designations

**Background:**

The adopted and effective City of Key West Comprehensive Plan of 2013 contains the Water Supply Work Plan required by Florida Statutes 163, Part II. This statute requires local governments to prepare and adopt 10-Year Water Supply Facilities Work Plans into their comprehensive plans within 18 months after the South Florida Water Management District (SFWMD) approves a regional water supply plan or its update. The 2013 Lower East Coast Water Supply Plan Update (2013 LECWSP Update) was adopted by the District's Governing Board on September 12, 2013. Therefore, local governments within the Lower East Coast Region are required to amend their comprehensive plans and include an updated 10-year Water Supply Facilities Work Plan and related planning elements by March 12, 2015. The State of Florida requires that the 10-year Water Supply Facilities Work Plan - 2014 Update address the development of traditional and alternative water supplies and management strategies, including conservation and reuse. The data and analyses, including population projections, water demands and service areas must cover at least a 10-year planning period and be consistent to the LECWSP and the updated comprehensive plan amendment.

Because the City of Key West does not have its own water utility, it relies entirely on the Florida Keys Aqueduct Authority for all its water production and distribution throughout the City. Therefore as updated by the 2013 LECWSP, the FKAA projections of water supply, water demand and management strategies are those that form the basis of the amendments to the City's Comprehensive Plan in order to implement the City Water Supply plan. The data that supports

the City’s effort to complete its Water Supply Plan updates is also found in the following attachments:

**Attachment A** contains a summary of the relevant portions of the FCAA 2006 Twenty Year Capital Improvement Plan (FCAA 2006 CIP), as updated by the FCAA 2015 budget in response to the 2103 LECWSP Update.

**Attachment B** is a summary of key parts of the South Florida Water Management District Lower East Coast Water Supply Plan

**Attachment C** contains Excerpts from the 2011 FCAA Strategic Plan

**Attachment D** contains excerpts from the Florida Statutes, which require the amendments to the City’s comprehensive Plan.

**Population and Water Demand**

Neither the FCAA 2006 CIP nor the 2013 LECWSP identify the population and water demand for the City of Key West separately. However, the 2015 FCAA Budget corrects the permanent population for the County based on the LECWSP 2013 Update and uses that as the basis for water supply demand for the utility along with a “seasonal” population estimate. The LECWSP 2013 Update provides both a permanent and “seasonal” population estimate for the County as a whole. The FCAA 2015 budget uses a total “functional” population figure of 155,000, which is the combination of permanent and seasonal populations for its description of water demand based upon data from two sources – the 2010-2012 American Community Survey 5 year estimates and estimates provided by the Monroe County Growth Management Division. The Florida statutes requiring local Water Supply Plans stipulate that the population projections of the LECWSP be used to project water demand. Although the FCAA and LECWSP estimates of total population differ for the initial years of demand, by the 2020 and 2030 timeframes they are very similar.

**Lower East Coast Water Supply Plan Estimates for Monroe County**  
**POPULATION AND WATER DEMANDS**

	Existing	Projected	
	2010	2020	2030
Population (permanent)	73,090	71,195	69,300
Population (seasonal)	78,401	82,151	86,855
Per Capita (gallons per day finished water)	109	124	139
Potable Water Demands (daily average annual finished water)	<b>16.45mgd</b>	<b>19.00mgd</b>	<b>21.70mgd</b>

The population of Key West both permanent and total functional was last estimated and recognized in the City Comprehensive Plan, which became effective in 2013, and is illustrated below.

**Table A2.2. Seasonal and Temporary Population Projections in Monroe County and Key West 2010 - 2030**

	2010	2015	2020	2025	2030
<b>Key West</b>	21,704	22,104	22,756	23,407	24,059
<b>Monroe County</b>	78,401	79,800	82,151	84,503	86,855

**Table A2.3. Functional Population Projections in Key West, 2010 – 2030**

	<b>2010</b>	<b>2015</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>
<b>Key West</b>	54,347	54,446	54,747	55,061	55,403

If the water demand per capita reported by the LECWSP is applied to the functional population for 2015, the total daily average annual finished water demand in Millions of Gallons Per Day (MGD) is 5,934,614. This figure represents 36% of the total projected water demand for the entire County.

### **Conservation**

Conservation is a proven strategy for delaying implementation of expensive alternative water supply technologies. The City may, like Monroe County establish a goal of reducing annual average day finished water demand to 100 gallons per person per day by the year 2028, the mandated timeframe for the Water Supply plan. The City has undertaken certain actions and will seek other opportunities to conserve water. Examples are:

1. Water Conservation Month – The month of April involves presentations, press releases and workshops that help businesses and residents reduce water use.
2. Conservation Rate Structure - progressively higher rates as water usage increases to encourage a water conservation ethic.
3. Florida-Friendly Landscaping - the City is currently developing a change to the Code of Ordinances to require Florida-friendly landscaping for new development and redevelopment.
4. Irrigation System Design Code - all new irrigation systems permitted after 2015 require rain sensors to automatically shutdown if rain is detected.
5. Landscape Irrigation Restrictions – the City has implemented progressive landscape irrigation restrictions that meet the requirements of the SFWMD.
6. Water Conservation Education Program - the City publishes a variety of brochures and literature, promoting water conservation along with maintaining a website that includes water conservation information.
7. Water Harvesting – the City hosts rain barrel workshops and requires cisterns for all new residential development.
8. Sustainability Action Plan 2011 - the City’s Sustainability Action Plan 2011 identified specification conservation actions that are ongoing.

While the City’s Water Supply Work Program of 2012 contained most of the objectives and policies required to meet the direction of state statute, there are several which must be modified in order to be consistent with the LECWSP update of 2013. The complete listing of the policies proposed for adoption by the City Commission is arrayed below. They are also contained in the ordinance attached to this staff report. The policies and objectives proposed for adoption are underlined and those proposed for elimination are ~~struck through~~. Where objectives and policies remain as they are presently stated, the text is neither struck through nor underlined.

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

### **CHAPTER 1: FUTURE LAND USE ELEMENT**

**OBJECTIVE 1-1.7: IMPLEMENT WATER SUPPLY PLANNING IN ACCORDANCE WITH STATE GROWTH MANAGEMENT REQUIREMENTS.**

**Monitoring Measure(s): Adoption and Update of Water Supply Plan by ~~2014~~ every five years after 2015.**

**Policy 1-1.7.1:** The City of Key West, through the Land Development Regulations, will coordinate the land uses and future land use changes with the availability of water supplies and water supply facilities.

**OBJECTIVE 1-1.12: CONSIDER APPLICATION OF INNOVATIVE LAND AND WATER RESOURCE MANAGEMENT, CLIMATE ADAPTATION, AND ENERGY CONSERVATION CONCEPTS.**

The City of Key West shall maintain Land Development Regulations which incorporate concepts for managing land, water, and energy resources which are responsive to unique development and conservation issues identified in the City's Comprehensive Plan. The City of Key West shall adopt Land Development Regulations which incorporate concepts for managing land, water, and the built environment which are responsive to climate change issues including but not limited to sea level rise and increased frequency of intense rainfall events.

**Monitoring Measure(s): Number of structures and sites protected through regulatory mechanisms.**

**Policy 1.1.12.6: Water Efficiency in Building and Construction.** The City shall set and enforce progressive water efficient building codes and retrofits, including but not limited to retrofit at resale, mandatory reuse areas, conservation tier rates, irrigation pump pressure control reduction, and the International Green Construction Code. The City shall explore regulatory and/or incentive programs and timelines to increase submetering, fixed interval metering, irrigation audits, rain/moisture sensor retrofits, The City shall promote attendance at regional training workshops in water conservation in construction and continue to foster cooperative relationships between building trades, architects, engineers and building officials.

**Policy 1.1.12.7: Conservation Tier Rates.** The City shall coordinate with the FKAA and other local governments on a conservation rate structure, as per Monroe County's Water Supply Plan.

**Policy 1.1.12.8: Stormwater Mitigation.** The City shall research and adopt new methodologies for rainwater retention in order to increase fresh water recharge as well as reduce stormwater flooding and nonpoint pollution. These new methodologies could include but are not limited to percolation tanks, green infrastructure, and stormwater mitigation fees.

**CHAPTER 4: PUBLIC FACILITIES ELEMENT**

**Policy 4-1.1.1: Level of Service Standards.**

**C. Potable Water Level of Service**

1. Quantity: 100 gal/capita/day
2. Minimum Pressure: 20 PSI at customer service

3. Minimum Potable Water Quality: Shall be defined by Chapter 62-550  
F.A.C.

**Objective 4-1.2: Adoption of the Key West Water Supply Facilities Work Plan.**

The City of Key West shall comply with its Water Supply Facilities Work Plan 2012-2025 (Work Plan) adopted March 19, 2013, as required by section 163.3177(6)(c), F.S. ~~within 18 months after the governing board of~~ and the South Florida Water Management District approved its Lower East Coast Water Supply Plan Update ~~on February 15, 2007~~ dated September 12, 2013. The Work Plan will be updated, at a minimum, every 5 years. The City's Work Plan is designed to: assess current and projected potable water demands; evaluate the sources and capacities of available water supplies; and identify those water supply projects, using all available technologies, necessary to meet the City's water demands for the planning period.

**Monitoring Measure:**

The Work Plan shall remain consistent with the Florida Keys Aqueduct Authority 20-Year Water System Capital Improvement Master Plan, which is compatible with the FCAA Water Use Permit renewals and with the projects listed in the South Florida Water Management District's Lower East Coast Regional Water Supply Plan Update adopted September 12, 2013. The Work Plan will be updated, at a minimum, every 5 years and within 18 months after the South Florida Water Management District's approval of an updated Lower East Coast Regional Water Supply Plan.

**Policy 4-1.2.1: Compliance with the Adopted Water Supply Facilities Work Plan.**

The City of Key West shall comply with its Water Supply Facilities Work Plan (2012–2025), ~~which is incorporated by reference into the Comprehensive Plan.~~

**Policy 4-1.2.2: Intergovernmental Coordination with Water Supply Planning**

Coordinate appropriate aspects of its Comprehensive Plan with the South Florida Water Management District's regional Water Supply Plan Update adopted September 12, 2013 ~~February 15, 2007~~, with the Florida Keys Aqueduct Authority (FCAA) 20-Year Water System Capital Improvement Master Plan adopted December 2006 as updated by the agency's 2015 fiscal and subsequent budgets and with the Monroe County Water Supply Plan adopted November 25, 2008 (as necessary). The City shall amend its Comprehensive Plan and Work Plan, as required to provide consistency with the District, County and FCAA plans.

**OBJECTIVE 4-2.3: RECONCILE EXISTING FUTURE POTABLE WATER DEFICIENCIES.**

The Florida Keys Aqueduct Authority has not identified any existing future system deficiencies. However, the future system includes regular use of the Authority's Reverse Osmosis plant, which is very energy and fiscally intensive. The more water efficiencies the City can create, the less expensive our future water will be. The City shall investigate potential water supply and water quality issues and coordinate at least annually in a formal meeting with the Board of the Florida Keys Aqueduct Authority for purposes of identifying problems, issues and opportunities associated with water quality, water supply, and water distribution.

## CHAPTER 5: COASTAL MANAGEMENT ELEMENT

### **Policy 5-1.2.2: Limit Impacts of Development and Redevelopment Upon Water Quality and Quantity, Wildlife Habitat and Living Marine Resources and Implement Policies for Shoreline Land Uses.**

#### **6. Ocean, Gulf, and Estuarine Water Quality.**

In order to protect the water quality of the Atlantic Ocean and the Gulf of Mexico, no new point source pollution shall be permitted to discharge into these waters or into ditches or canals flowing into these waters. In addition, in order to reduce nonpoint source pollutants the City shall require the following:

f. By 2017, the City shall incorporate and encourage evaluation of rainwater collection, distribution and percolation systems into stormwater management planning.

g. The City shall research certification and licensing programs which encourage responsible business practices. This includes, but is not limited to the Green Industries – Best Management Program and a Florida certified irrigation specialty contractor’s license.

## CHAPTER 6: CONSERVATION ELEMENT

### **Policy 6-1.2.5: Protection and Conservation of Potable Water Supply.**

The City of Key West has no wellfields and has no need for a wellfield protection ordinance. In order to comply with policies of the South Florida Water Management District directed toward conservation of potable water supply, reduce irrigation needs and to achieve a reduction in the current rates of water consumption, Land Development Regulations shall be amended to incorporate the following performance standards:

1. Where nonpotable alternative sources of irrigation water are available, potable water supplies may not be used to meet irrigation needs.
2. Require the use of high-efficiency water-saving plumbing fixtures on all new development.
3. ~~In order to reduce demand for irrigation water (which in turn often places greater demand upon potable water sources),~~ At least fifty (50%) percent of all landscaping material obtained from offsite sources for use on any site should be native plant material adapted to soil and climatic conditions existing on the subject site. Further, at least thirty (30%) percent of all trees used in landscaping shall be native species adapted to soil and climatic conditions existing on-site in order to lessen water demand.
4. The City will explore and pilot innovative concepts in reuse of water, including use of cisterns for collecting rainwater for use in spray irrigation. In addition the City shall study the feasibility of reuse of treated effluent (gray water).
5. In order to reduce demand for irrigation water, rainwater collection and gray water reuse (if feasible) will be identified.

6. At least 75% of the landscape must utilize ‘right plant, right place’ practices, as defined by Florida-Friendly Landscaping Design Standards.

**Policy 6-1.2.8: Water Supply Demand.**

Implementation of the Work Plan shall ensure that adequate water supplies and public facilities are available to serve the water supply demands of any population growth that the City may experience. The City shall also work to reduce the water supply demand through efficiencies and conservation.

**Policy 6-1.2.9: Coordinated Water Supply Planning.**

The City shall coordinate the planning of potable water and sanitary sewer facilities, water supply sources, demands, other services and level-of-service standards with the FKAA, South Florida Water Management District, and through the Lower East Coast Water Supply Plan Update adopted September 12, 2013, as necessary.

**Policy 6-1.2.10: Issue Response.**

If in the future there are issues associated with water supply, conservation or reuse, the City will immediately contact the FKAA to address the corresponding issue(s). In addition, the City will follow adopted communication protocols with the FKAA to communicate and/or prepare an appropriate action plan to address any relevant issue(s) associated with water supply, conservation or reuse.

**Policy 6-1.2.11: Efficient Equipment and Appliances.**

The City will encourage the use of high efficiency toilets, showerheads, faucets, clothes washers and dishwashers that are Energy Star rated and WaterSense certified in all retrofitted residential and commercial projects.

**Policy 6-1.2.12: Efficient Equipment and Appliances.**

The City will require the use of high efficiency/ultra-low volume toilets, showerheads, faucets, clothes washers and dishwashers that are Energy Star rated and WaterSense certified in all new residential and commercial projects, including major and minor development plans.

**Policy 6-1.2.13: Sub-metering for Multi-unit Development.**

The City shall require the use of sub-metering for all multi-unit residential developments and redevelopments which will include: separate meter and monthly records kept of all major water-using functions, such as, cooling towers and individual buildings, in all new and redeveloped multi-family residential projects.

**Policy 6-1.2.14: Landscape Guidelines.**

The City will adopt Florida-Friendly Landscape guidelines and principals; gutter downspouts, roof runoff, and rain harvesting through the use of cisterns, rain barrels and directing runoff to landscaped areas; drip irrigation or micro- sprinklers; rain or moisture sensor irrigation controllers; and the use of porous surface materials (bricks, gravel, turf block, mulch, pervious concrete, etc.) on walkways, driveways and patios.

**Policy 6-1.2.15: Water Savings Incentive Program.**

The City will participate, when warranted, in the SFWMD's Water Savings Incentive Program (WaterSIP) for large-scale retrofits, as recommended by the Lower East Coast Water Supply Plan.

**Policy 6-1.2.16: Water conservation Plan.**

The City shall coordinate with the FKAA to submit a water conservation plan. Said plan shall be updated for the FKAA's approval every five years following submittal and Conserve Florida Guide generated reports shall be filed annually at the close of the fiscal year.

**Policy 6-1.2.17: Landscape Restrictions for Future Development.**

The City shall require all future developments and redevelopments to comply with the landscape restrictions for irrigation, as enumerated in Section 74-297 of the City Code, as amended.

**Policy 6-1.2.18: Estimating Non-metered water Usage.**

The City shall cooperate with the FKAA in estimating non-metered water usage for regulatory reporting.

**Policy 6-1.2.19: Proactive Building Codes**

The City shall research and adopt sections of the International Green Construction Code that increase efficiency without substantially increasing cost or complexity.

**CHAPTER 8: INTERGOVERNMENTAL COORDINATION ELEMENT**

**Policy 8-1.3.4: Coordinated Plans.**

The City shall coordinate the adopted Comprehensive Plan with the plans of the school board, FKAA, and other units of local government providing services but not having regulatory authority over the use of land, and with the Comprehensive Plan of Monroe County, with the state comprehensive plan and with the South Florida Water Management District's Water Supply Plan and Lower East Coast Water Supply Plan Update.

**Policy 8-1.3.5: Coordinated Facility Planning.**

The City shall coordinate the planning of potable water and sanitary sewer facilities, water supply sources, demands, other services and level-of-service standards with the FKAA, South Florida Water Management District and through the Lower East Coast Water Supply Plan Update adopted September 12, 2013, as necessary.

**Policy 8-1.3.6: Consistency of Level of Service Standards.**

Ensure and identify the consistency of local level of service standards by annually contacting all local governments to which water service is provided and provide current information, including: populations, level of services, service areas, and water supply facilities, and evaluate if future modification to either the service agreement or level of service standards should be included in subsequent Comprehensive Plan Amendments.

**Policy 8-1.3.7: Inter-Local Agreements.**

Negotiate or renew inter-local agreements with water supply providers, ensuring contractual



agreement of the adopted level of service standards, service area, populations and times for services provided. Seek an interlocal with Miami-Dade County providing the City of Key West with an opportunity to comment on land use and regulatory issues related to the Florida City Wellfield, aquifer and aquifer recharge area; setting forth procedures for review of land use and regulatory activities identified as having potentially significant impacts on the aquifer recharge and water supply systems especially concerning hazardous waste generation. Criteria for determination of significant impacts shall be included in the interlocal agreement.

## **CHAPTER 9: CAPITAL IMPROVEMENTS ELEMENT**

### **Policy 9-1.6.1: Level of Service Standards. Potable Water Level of Service**

#### **Residential**

100 gal/capita/day

1. Quantity: 100 gal/capita/day
2. Minimum Pressure: 20 PSI at customer service
3. Minimum Potable Water Quality: Shall be defined by Chapter 62-550 F.A.C.

### **Objective 9-4.1: Concurrency Management Procedures.**

Appropriate mechanisms will be developed and adopted with the FKAA and South Florida Water Management District in order to assure that adequate water supplies are available to all water users. Prior to approval of a building permit or its functional equivalent, the City shall consult with the FKAA to determine whether adequate water supplies to serve the new development will be available no later than the anticipated date of issuance of a certificate of occupancy. Furthermore, the City will be responsible for monitoring the availability of water supplies for all water users and for implementing a system that links water supplies to the permitting of new development.

### **Policy 9-4.1.1: Coordination of Land Use and Water Service and Delivery Systems.**

The City will ensure the financial feasibility of the public water infrastructure system by coordinating its land development practices with the FKAA water service production and delivery systems.

### **Policy 9-4.1.2: Intergovernmental Procedures with the Florida Keys Aqueduct Authority.**

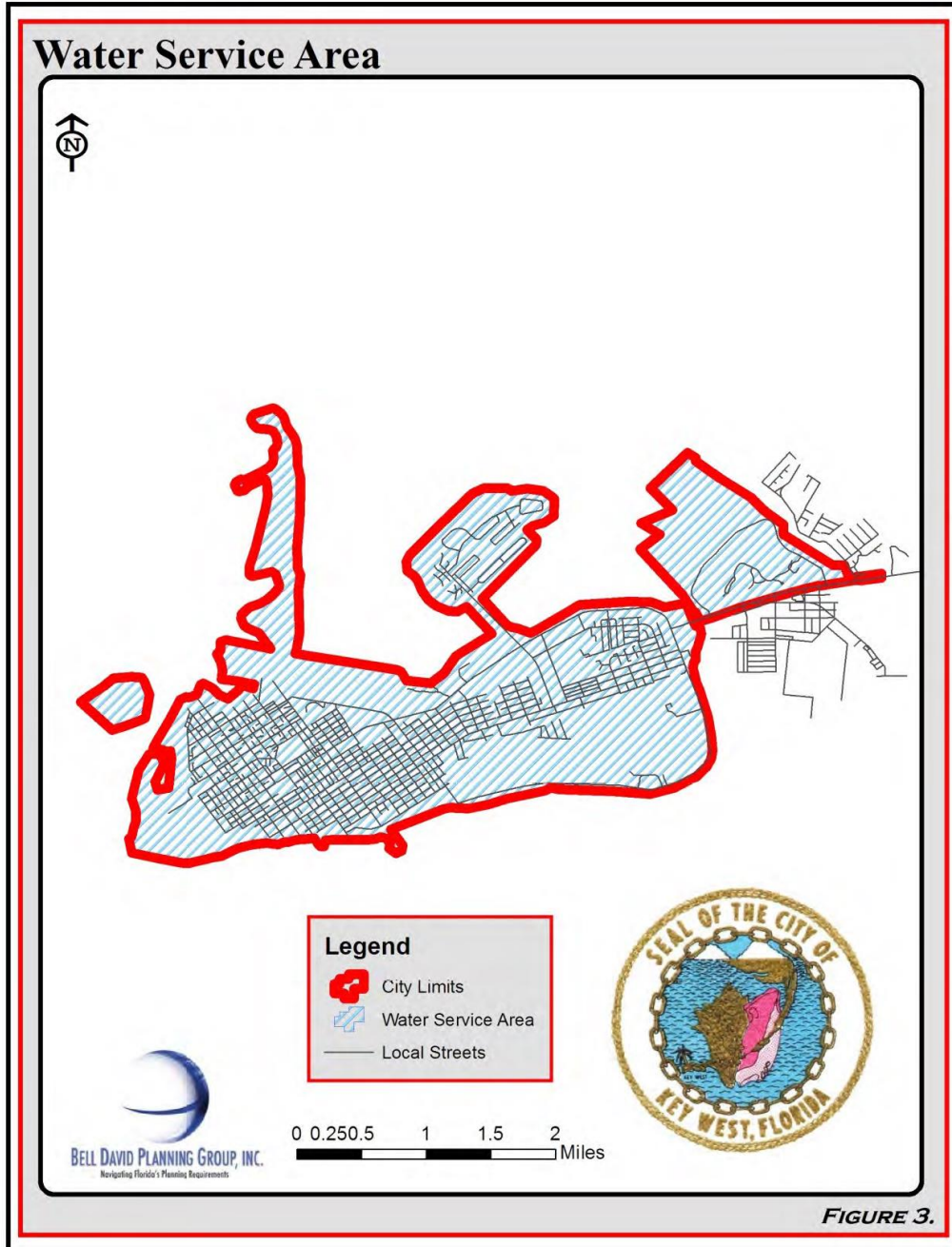
The City shall provide monthly data to the FKAA, or as required by such entity, to track the amount of water to be allocated for new use.

### **Policy 9-4.1.3: Capital Improvement Schedules of Other Agencies.**

The City shall incorporate capital improvements affecting City levels of service by referencing the Capital Improvements Schedules of the FKAA (~~2011/2012~~ 2015/2016 through 2020/2021 ~~2015/2016~~), state agencies and other units of government providing services, but not having regulatory authority over the use of land, into its Five-Year Schedule of Capital Improvements (Fiscal Years 2011/2012 through 2015/2016). The City Schedule shall be maintained and updated annually.

### Water Service Area

The water service area of the City of Key West is that of its corporate limits. The City does not supply or re-sell water to other jurisdictions or users, with the exception of providing water to cruise ships when docked at the City's piers when requested. The service area is illustrated below.



### Process:

Planning Board Meeting:

October 15, 2015

City Commission Meeting:

To be determined

## **Analysis – Evaluation for Compliance with the Land Development Regulations:**

The criteria for evaluating a change to the Comprehensive Plan are listed in Section 90-954 and 955 of the City Code. The Planning Board, before recommending a change to the Comprehensive plan, shall consider the following:

### **1. Justification.**

**a. Comprehensive Plan Consistency.** Identifying impacts of the proposed change in the comprehensive plan future land use map on the overall purpose of the comprehensive plan and consistency with applicable policies within the comprehensive plan.

**Response:** *The Comprehensive Plan contains the City's Water Supply Work Plan which according to state statute must identify the amendments to the Comprehensive Plan necessary to maintain consistency with the Lower East Coast Water Supply Plan (LECWSP) enacted and updated by the South Florida Water Management District. The proposed amendments contained in this staff report conform to the Work Plan and the 2013 update of the LECWSP.*

**b. Impact on surrounding properties and infrastructure.** The effect of the change, if any, on the particular property and all surrounding properties. Identify potential land use incompatibility and impacts on infrastructure.

**Response:** *No negative are expected from the implementation of the policies proposed, rather over time the implementation of the policies will provide a more reliable and safe water supply by identifying water conservation methods and by protecting the well fields serving the FKAA users.*

**c. Avoidance of special treatment.** The proposed change shall not:

1. Single out a small piece of land and confer special and privileged treatment not provided to abutting properties with similar characteristics and land use relationships; and
2. Provide for land use activities, which are not in the overall public interest but only for the benefit of the landowner.

**Response:** *The entire Water Supply Plan Update has been tailored to identify methods and practices the City can use to cooperate with the FKAA and the SFWMD to ensure a safe and effective water supply for the City. The City WSP has been written in direct response to state statute, which outlines the public interest to be served by an updated water supply plan.*

**d. Undeveloped land with similar comprehensive plan future land use map designation.** The amount of undeveloped land in the general area and in the city having the same zoning classification as that requested shall be stated.

**Response:** *Not applicable – the WSP does not identify any particular property to be affected by its policies. The policies and objectives apply equally across the entire City.*

2. **Consistency with plan.** Whether the proposal is consistent with the overall purpose of the comprehensive plan and relevant policies within the comprehensive plan, including the adopted infrastructure minimum levels of service standards and the concurrency management program.  
**Response:** *The proposed update of the Water Supply plan is in conformance with the Work Plan and establishes new water Level of Service standards, which were not in the 2012 Work Plan due to the impending changes to the LECWSP of 2103. The proposed standards now include both quantity and quality LOS for all water users.*
  
3. **Conformance with ordinances.** Whether the proposal is in conformance with all applicable requirements of the Code of Ordinances.  
**Response:** *There are no parts of the City's Code of Ordinances, which are inconsistent with the proposed objectives and policies. In fact the proposals re-enforce the following the sections of City code:  
Section 74 Subdivision III – Restrictions During Water Shortage Conditions, subsections 301-308  
Section 74-238- Estimates of Flow and base charge units  
Section 108-233(1) Concurrency Facilities- Potable Water  
Section 108-956(1) Potable water Access  
Section 108-957 Conservation of Potable Water*
  
4. **Changed conditions.** Whether, and the extent to which, land use and development conditions have changed since the comprehensive plan's effective date and whether such conditions support or work against the proposed change.  
**Response:** *The Lower East Coast Water Supply Plan 2013 Update and the 2015 FKAA Budget both only available after the Comprehensive Plan WSP Work Plan of 2012 was completed. Both these new documents provide new data and policy direction, which should be reflected in the Water Supply Plan of the Comprehensive Plan in 2015.*
  
5. **Land use compatibility.** Whether, and the extent to which, the proposal would result in any incompatible land uses, considering the type and location of uses involved.  
**Response:** *No known land use incompatibilities will occur because the proposed amendments do not change land use designations or zoning.*
  
6. **Adequate public facilities.** Whether, and the extent to which, the proposal would result in demands on public facilities and services, exceeding the capacity of such facilities and services, existing or programmed, including transportation, water and wastewater services, solid waste disposal, drainage, recreation, education, emergency services, and similar necessary facilities and services. Approval of a plan amendment does not constitute a concurrency determination, and the applicant will be required to a concurrency determination pursuant to [chapter 94](#).  
**Response:** *The proposed changes to the City Water Supply Plan of the Comprehensive Plan are specifically directed to provide for more control to the City to ensure that negative concurrency issues do not occur. This can be done by recognizing the new Potable water LOS is more precise and understandable.*

- 7. Natural environment.** Whether, and to the extent to which, the proposal would result in adverse impacts on the natural environment, including consideration of wetlands protection, preservation of groundwater aquifer, wildlife habitats, and vegetative communities.  
**Response:** *The proposed policies and standards of the revised water Supply plan are specifically written to protect a scarce and expensive resource – Potable Water - and to encourage conservation of the resource*
- 8. Economic effects.** Whether, and the extent to which, the proposal would adversely affect the property values in the area or the general welfare.  
**Response:** *By proposing policies to encourage water conservation and re-use the cost of providing water through the FKAA over time may decrease. This is dependent, in part, upon conservation to reduce the amount of water generated by the FKAA reverse osmosis placed within the potable water delivered to the Florida Keys.*
- 9. Orderly development.** Whether the proposal would result in an orderly and compatible land use pattern. Any negative effects on such pattern shall be identified.  
**Response:** *The proposed policies, LOS standards and programs when implemented should aid in the provision of potable water to augment other policies of the Comprehensive Plan which guide the location, type and quality of development within the City.*
- 10. Public interest; enabling act.** Whether the proposal would be in conflict with the public interest, and whether it is in harmony with the purpose and interest of this subpart B and its enabling legislation.  
**Response:** *The Work Plan for the WSP in the 2012 Comprehensive Plan specifically identifies the required elements of the revised WSP as directed by Florid Statutes relating to Water Supply Plans.*
- 11. Other matters.** Other matters which the planning board and the city commission may deem appropriate.  
**Response:** *No other matters not already discussed impact the City Commission's decision to adopt or not adopt the recommended revisions to the Comprehensive Plan.*

## **RECOMMENDATION:**

The Planning Department, based on the criteria established by the Comprehensive Plan recommends:

That the Planning Board approve the proposed resolution recommending to the City Commission that the proposed changes to the Water Supply Element of the Comprehensive Plan be adopted.