

Major Development Plan Project Analysis

801 Eisenhower Drive
(RE No. 00023190-000000)

Summary:

Interior renovations to construct ten new transient residential units and eliminate approx. 12,000 sq. ft. of commercial floor area.

TREPANIER



& ASSOCIATES INC

LAND USE PLANNING
DEVELOPMENT CONSULTANTS



Analysis:

The following is an analysis of the proposed project pursuant to major development plan approval criteria.

Existing development is depicted in attached surveys and plans, including:

- | | | |
|----------------------------------|----------------------------|------------------------|
| ▪ Name of Development | ▪ Location/ street address | ▪ Utility locations |
| ▪ Name of Owner/ Developer | ▪ Size of site | ▪ Existing vegetation |
| ▪ Scale | ▪ Buildings | ▪ Existing storm water |
| ▪ North arrow | ▪ Structures | ▪ Adjacent land uses |
| ▪ Preparation and revision dates | ▪ Parking | ▪ Adjacent buildings |
| | ▪ FEMA flood zones | ▪ Adjacent driveways |
| | ▪ Topography | |
| | ▪ Easements | |

Proposed development is depicted in attached plans prepared by licensed design professionals, including:

- Buildings
- Setbacks
- Parking
- Driveway dimensions and material
- Utility locations
- Garbage and recycling
- Signs
- Lighting
- Project Statistics
- Building Elevations
- Height of buildings
- Finished floor elevations
- Height of existing and proposed grades
- Drainage plan
- Landscape Plan

Title block (Sec. 108-227)

Name of development: 801 Eisenhower
 Owner/developer: Old Town Trolley Tours of Washington, Inc.
 Scale: As noted on plans
 Preparation and revision dates: As noted on plans
 Location: 801 Eisenhower

Key persons and entities (Sec. 108-228) involved in this project are as follows:

Owner: Old Town Trolley Tours of Washington, Inc.
 Authorized Agent: Trepanier & Associates, Inc.
 Architect: WSA - William Shepler & Associates Architecture
 Engineer: Meridian Engineering, LLC
 Surveyor: Florida Keys Land Surveying
 Landscape Architect: Trepanier & Associates, Inc.
 Legal and Equitable Owners: Old Town Trolley Tours of Washington, Inc.

Project Description (Sec. 108-229):

Interior renovations to construct ten transient residential units and eliminate approx. 12,000 sq. ft. of commercial floor area. Minor exterior modifications outside of building to facilitate redevelopment to transient. A pool and pool bar will be added and dockage shall remain. Increases in open space and landscaping, reduction in impervious area will also be realized. Stormwater management will be improved via installation of rainwater catchment system. Legal Description is included on the attached warranty deeds and survey.

The site has the following characteristics:

Site Data	Permitted	Existing	Proposed	Compliance
Zoning	CG	CG	No Change	<i>Complies</i>
Min Lot Size	15,000 sf	31,726 sf	No Change	<i>Complies</i>
Commercial FAR	0.8	0.38	0.38	<i>Complies</i>
Density	16 du/acre	0	10 units	<i>Complies</i>
Total Units	13	0 units	10 units	<i>Complies</i>
Max Height	40'	27'	29'	<i>Complies</i>
Open Space Ratio	20%/ 35%	19.2% (6,114 sf)	19.7% (6,258 sf)	<i>Complies*</i>
Landscape	20%/35%	19.2% (6,114 sf)	19.7% (6,258 sf)	<i>Complies*</i>
Building Coverage	40%	29% (9,248 sf)	31% (10,017 sf)	<i>Complies</i>
Impervious Surface Ratio	60%	81% (25,756 sf)	80% (25,468 sf)	<i>Complies*</i>
Setbacks: Front	25 ft.	43'8"	36'3"	<i>Complies</i>
Side	15 ft.	31'2"	31'2"	<i>Complies</i>
Side	15 ft.	28'4"	28'4"	<i>Complies</i>
Rear	25 ft.	43'1"	43'1"	<i>Complies</i>

* Existing non-conformity pursuant Sec. 122-27

Other Project Information (Sec. 108-230):

Construction is proposed in a single phase to progress steadily based on Key West LDRs, and Florida Building Code.

1. The target date for commencement shall follow entitlement approvals as quickly as possible.
2. Expected date of completion is within 2 year of commencement.
3. The proposed development plan is contained herewith.
4. This application proposes to renovate the interior of the existing structure to create a total of ten transient units and eliminate approx. 12,000 sq. ft. reduction of commercial floor area as depicted on the plans.
5. Project is not a planned unit development.
7. The project will comply with federal flood insurance regulations.
8. This project is not located in an environmentally sensitive area.

Residential Developments (Sec. 108-231):

The project consists of ten transient units

Intergovernmental Coordination (Sec. 108-232):

Coordination is anticipated to occur through the Development Review Committee process of the City of Key West.

Schedule of Approval Process:

The following development approval schedule and process is anticipated:

Step	Date
1. Submit Applications	12/19/16
2. Development Review Committee ("DRC") Meeting	01/24/17
3. Tree Commission Submission	01/25/17
4. Planning Board Meeting	12/22/17
5. AIPP Meeting	TBD
6. Tree Commission	01/09/17
7. City Commission Meeting	01/15/18
8. City Commission Appeal Period	30 days
9. Florida Department of Economic Opportunity Appeal Period (45 days)	45 days

Concurrency Facilities and Other Utilities or Services (Sec. 108-233):

Levels of Service –The impacts of the proposed project are generally summarized as follows:

- Transportation: -42 trips per day
- Potable Water: +1,400 gallons per day
- Sanitary Sewage: +4 gallons per day
- Solid Waste: +12 pounds per day.
- Recycling: +12 pounds per day.
- Storm Water Management: +100%
- Recreational Opportunities: +pool, pool bar, dockage, bicycle parking

Appearance, design, and compatibility (Section 108-234):

This development plan satisfies criteria established in Chapter 102; Articles III, IV and V of Chapter 108; Section 108-956; and Article II of Chapter 110 of the Key West City Code in the following manner:

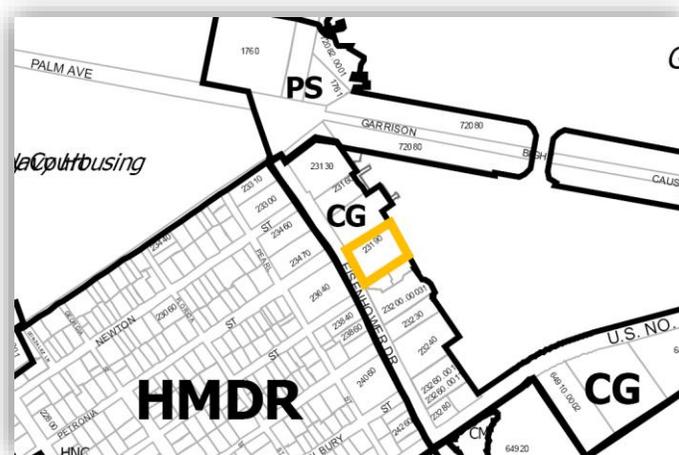
- Chapter 102 – This property is not located within the Historic District.
- Articles III, IV and V of Chapter 108 – As demonstrated by the site plan, trip generation analysis, and the site data calculations, the project complies with the requirements of the Articles.
- Chapter 110 – As demonstrated in this application, the proposed development complies with the resource protection requirements of Chapter 110.

Site Location and Character of Use (Section 108-235):

(a) *Compliance.* This development plan complies with the requirements set forth in the Key West City Code as they pertain to Concurrency Management, Outdoor Displays and Nuisances, Resource Protection, Signs, and Articles I and III to IX of Chapter 108 of the Key West City Code.

(b) *Vicinity Map.*

(c) *Land Use Compatibility.* The project site is located in the General Commercial district (CG) zoning district. The general commercial district (CG) is established to implement comprehensive plan policies for areas designated "CG" on the comprehensive plan future land use map. The CG district shall accommodate general commercial uses which shall



include commercial retail, highway-oriented sales and services, other general commercial activities specified in section 122-1111 pertaining to land use by districts, customary accessory uses, and requisite community facilities. The general commercial district shall service the general commercial needs of residents and tourists which are not fulfilled in the historic area mixed use districts. The area is generally located along the North Roosevelt Corridor. Single-family, duplex and multiple-family residential activities may be accommodated only if approved as a conditional use pursuant to conditions and procedures identified in article III of this chapter. Height restrictions shall ensure a more effective land use transition from adjacent and nearby single-family neighborhoods.

(d) *Historic and archeological resource protection.* The site is not located within the Historic District. Any archeological resources will be protected as required.

(d) *Subdivision of Land.* No subdivision is proposed.

Appearance of Site and Structures (Sec. 108-236):

Attached site plan complies with Sections 108-278 through 108-288 of the Key West City Code. (See below.)

Site Plan (Sec. 108-237):

Site plan of proposed development drawn consistently with Sec. 108-237 is attached.

Architectural Drawings (Sec. 108-238):

All architecture or engineering designs were prepared and sealed by a professional architect or engineer registered in the state pursuant to F.S. Ch. 471 and 481, respectively, consistent with the provisions of this Section.

Site Amenities (Sec 108-239):

The attached site plan includes existing and proposed amenities which are required to comply with appearance, design and compatibility regulations outlined in chapter 102; articles III, IV and V of this chapter; section 108-956; and article II of chapter 110.

Site Survey (Sec 108-240):

Survey of the site is attached.

Soil Survey (Sec 108-241):

Soil surveys are not anticipated as part of this project.

Environmentally Sensitive Areas (Sec. 108-242):

No Environmentally sensitive areas exist on this site.

Land clearing, excavation and fill, tree protection, landscaping and irrigation plan (Sec. 108-243):

All proposed clearing, excavation and landscaping is depicted on attached plans.

On-site and off-site parking and vehicular, bicycle, and pedestrian circulation (Sec. 108-244):

Parking demand will decrease. All proposed on-site parking and vehicular, bicycle, or pedestrian circulation is depicted on attached plans.

There is an approximate 12,000 sq. ft. reduction in commercial floor area and a thus a commensurate reduction in commercial parking demand of 40 spaces. There is a proposed increase of 10 transient residential dwellings with a commensurate increase in residential parking demand of 11 spaces. The transient units have a bicycle parking demand of 35%¹, all of which are provided on site.

¹ Sec. 108-572 (35% of 11= 4 bicycle spaces)

The parking demand will significantly decrease as a result of the redevelopment; the existing parking area will include 23 parking spaces including 1 handicap parking space.

Housing (Sec 108-245):

The ten (10) transient residential units acknowledge the current hurricane evacuation and emergency operations plans as they have been accounted for in ROGO.

Economic Resources (Sec 108-246):

Trepanier & Associates, Inc. has contacted the Monroe County Property Appraiser's office to seek assistance in estimating the average ad valorem tax yield from the proposed project. To date no predictive ad valorem tax information is available.

Special Considerations (Sec 108-247):

The proposal complies with the goals, objectives and policies of the comprehensive plan and as demonstrated by this and the concurrency analysis there are no conflicts with the existing public facilities, such as sanitary sewer treatment and transportation. This project complies with all City land use plans, objectives and policies.

Construction Management Plan and Inspection Schedule (Sec 108-248):

The proposed development is single-phase. Construction is proposed to progress steadily based on Key West LDRs, and Florida Building Code. Construction is expected to commence as soon as possible.

Truman Waterfront Port Facilities (Sec 108-249):

This project is not located at the Truman Waterfront Port

SITE PLAN

Scope (Sec 108-276):

This site plan conforms to all applicable sections of land development regulations.

Site Location and Character of Use (Sec. 108-277):

As depicted, the site has sufficient size, adequate specifications, and infrastructure to accommodate the proposed use.

Appearance of Site and Structures (Sec. 108-278):

This application's development plan exhibits harmonious overall design characteristics in compliance with the performance standards stipulated in sections 108-278 through 108-288.

Location and screening of mechanical equipment, utility hardware and waste storage areas (Section 108-279):

All mechanical equipment and utility hardware will be appropriately screened. All waste storage areas will be screened from adjacent properties.

Front-end loaded refuse container requirements (Sec. 108-280):

No significant changes to the waste removal system are proposed.

Roll-off Compactor Container location requirements (Sec. 108-281):

NA - No roll-off containers proposed as part of the operation of the development

Utility lines (Section 108-282):

The proposed project will require installation of new utility services. Installation will be coordinated with appropriate utility agency and in accordance with Section 108-282.

Commercial and manufacturing activities conducted in enclosed buildings (Section 108-283):

All commercial activities will be conducted in enclosed buildings per the site plans.

Exterior Lighting (Section 108-284):

All proposed lighting shall be shielded and lighting sources shall be arranged to eliminate glare from roadways and streets and shall direct light away from properties lying outside the district. Shielding of lighting elements shall be accomplished by using directional fixtures or opaque shades.

Signs (Section 108-285):

Proposed signage will be harmonious with the design theme of the project, will be aesthetically pleasing and reinforce good principles and practices of design.

Pedestrian sidewalks (Section 108-286):

No new sidewalks are proposed.

Loading docks (Section 108-287):

No loading docks are required or proposed.

Storage Areas (Section 108-288):

No outdoor storage areas are proposed.

Land Clearing, Excavation, and Fill (Sec 108-289):

There is no land clearing proposed.

Open Space, Screening, Buffers and Landscaping (Article V and VI) of Chapter 108:

The property is an existing nonconformity relative to Open Space, Impervious ratio and Landscaping. An increase in open space and landscaping is proposed as is a reduction in impervious area. These commiserate improvement preclude any requirement for variance(s) in accordance with Chapter 122, Article II.

Off-street parking and loading (Article VII):

No requirements for off-street parking and loading due to the commercial floor area of less than 10,000 sq. ft.

Storm water and Surface Water Management (Article VIII):

Proposed changes to the existing storm water management system are shown on attached plans.

Flood Hazard Areas (Division 4 - Sections 108-821 through 108-927):

The proposed project is located in the AE 7 flood zone. The first habitable floor of all units is proposed at approximately 8.5' elevation; this height is 1.5 feet above the FEMA based flood level.

Utilities (Article IX):

See Concurrency Analysis below.

Criteria for review and approval:

- (1) Land use compatibility: As stated above, the project site is located in the General Commercial district (CG) zoning district. The intent of the general commercial district is to service the general commercial needs of residents and tourists which are not fulfilled in the historic area mixed use districts. This project seeks to meet the needs of tourists through development of ten (10) transient residential units.
- (2) Sufficient site size, adequate site specifications, and infrastructure: As mentioned above, the site has sufficient size, adequate specifications, and infrastructure to accommodate the proposed use.
- (3) Proper use of mitigative techniques: No adverse impacts to adjacent land uses are anticipated. The community infrastructure will not be burdened by this project.
- (4) Hazardous waste: The proposed use will not produce any hazardous waste or use hazardous materials in its operation.
- (5) Compliance with applicable laws and ordinances: All applicable permits required from agencies other than the City of Key West will be obtained.

CONCURRENCY ANALYSIS:

Concurrency Facilities and Other Utilities or Services (Sec. 108-233):

The City's Comprehensive Plan directs the City to ensure that facilities and services needed to support development are available concurrent with the impacts of new development.

The following specific issues are outlined:

1. Roads/Trip Generation

2. Potable Water
3. Sanitary Sewer
4. Solid Waste
5. Recyclables
6. Drainage

Policy 2-1.1.1- Transportation

The maximum predicted potential trip generation of the current land use is more than the maximum predicted potential trip generation from the proposed land use. The LOS analysis concludes that overall trip generation from the site will be expected to decrease by approximately 42 trips per day as part of the proposal.

Use	Existing			Proposed		
	Rate	Trips	Trips/Day	Rate	Trips	Trips/Day
Transient	8.92 trips/unit ²	0u x 8.92t/u = 0	0	8.92 trips/unit	10u x 8.92 t/u = 89	89
Office	11.01 trips/1k sq.ft. ³	12,261sf x 11.01t/1ksf = 135	135	11.01 trips/1ksq.ft.	0sf x 11.01t/1ksf = 0	0
Tiki Bar	15.49 trips/1k sq.ft. ⁴	0sf x 15.49t/1ksf = 0	0	15.49 trips/1ksq.ft.	250sf x 15.49 t/1ksf = 3.9	4
		Total Existing	135		Total Proposed	93

Notwithstanding the reduction in trip generation, Policy 2-1.1.3: Dense Urban Land Area, eliminates the transportation concurrency requirement in favor of a prioritization of safety and function of existing roads and multi-modal transportation improvements (i.e. transit, air, boat, bicycles, pedestrianism, mixed-use development)

Policy 4-1.1.2.C – Potable Water

Based on the City of Key West adopted level of service the potable water demand is anticipated to increase at the end of this single-phase development plan (pursuant to Policy 4-1.1.2.C, the potable water LOS for residential and nonresidential development is 100 gal/acre/day)

The potable water flow is anticipated to be 4,900 gal/day

Summary Response: The proposed redevelopment will increase the expected impact from the existing use of the property by approximately 1,400 gallons per day; therefore, based on the capacity of the FKAA pumping permit, it is not expected that the proposal will result in excess capacity on this public facility.

Use	Existing			Proposed		
	Rate	Capacity	Gal/Day	Rate	Capacity	Gal/Day
Transient	100 gal/capita ⁵ /day	0c x 100g/c/d = 0g/d	0	100 gal/capita/day	38c x 100g/c/d = 3,800g/d	3,800
Office	100 gal/capita ⁶ /day	35c x 100g/c/d = 3,494g/d	3,500	100 gal/capita/day	0c x 100g/c/d = 0g/d	0
Tiki Bar	100 gal/capita ⁷ /day	11c x 100g/c/d = 0g/d	0	100 gal/capita/day	11c x 100g/c/d = 1,100g/d	1,100
		Total Existing	3,500		Total Proposed	4,900

Policy 4-1.1.2.A- Sanitary Sewage

² ITE Hotel (310)

³ ITE General Office (710)

⁴ ITE Drinking Place (936) – *peak hour*

⁵ For the purposes of LOS, "capita" was calculated as *proposed units x persons per occupied unit hotel/motel* using 2x's the Planners Estimating Guide, p. 137: Table 11-1-Basic Impact Coefficients

⁶ Planners Estimating Guide, p. 137: Table 11-1-Basic Impact Coefficients 2.85 persons per 1,000 sq. ft. of general office Space

⁷ Capita is estimated by 10 seats with 1 employee

Based on the City of Key West adopted level of service the sanitary sewer demand is anticipated to increase at the end of this single-phase development plan (pursuant to Policy 4-1.1.2.A, the sanitary sewer LOS for nonresidential development is 660 gal/acre/day).

The sanitary sewer flow is anticipated to increase by 4 gal/day.

Summary Response: The proposed redevelopment will have virtually no change in impact on sanitary sewer based on the LOS.

Use	Existing			Proposed		
	Rate	Capacity	Gal/Day	Rate	Capacity	Gal/Day
Transient	660 gal/acre/day	$0.0a \times 660g/a/d = 0g/d$	0	660 gal/acre/day	$0.73a \times 660g/a/d = 482g/d$	482
Office	660 gal/acre/day	$0.73a \times 660g/a/d = 482g/d$	482	660 gal/acre/day	$0.0a \times 660g/a/d = 0g/d$	0
Tiki Bar	660 gal/acre/day	$0.0a \times 660g/a/d = 0g/d$	0	660 gal/acre/day	$5.7^2a \times 660g/a/d = 3.7g/d$	4
		Total Existing	482		Total Proposed	486

The City contracts the operation of the Richard A. Heyman Environmental Pollution Control Facility, its wastewater treatment plant (Plant), and the associated collection system to Operations Management International, Inc. (OMI). The Plant currently has the capacity to treat 10 million gallons per day, exceeding the capacity required to achieve the existing Level of Service Standard by approximately seven million gallons per day. Actual daily flow is 4.5 million gallons per day. This is a reduction from eight (8) million gallons per day due to a 67 million dollars capital improvement to the City's wastewater treatment during the past short term planning period, including \$56 million for collection system rehabilitation.

As documented above, the City is exceeding its Level of Service Standard for Wastewater. The City projects a slight permanent population decrease, and only a slight increase in its functional population and non-residential development, during the short and long range planning periods, so the current capacity should remain adequate. Ongoing capital improvements and continuing conservation efforts will continue to maintain and improve service delivery.

Policy 4-1.1.2.D- Solid Waste

Based on the City of Key West adopted level of service the solid waste demand is anticipated to decrease at the end of this single-phase development plan (pursuant to Policy 4-1.1.2.D, the solid waste LOS for nonresidential development is 6.37 lbs/capita/day).

The solid waste impact is anticipated to be 494 lbs/day

Summary Response: The proposed redevelopment will increase the expected impact from the existing use of the property by 12 pounds per day; therefore, it is expected that the proposal will have a minimal impact upon capacity.

Use	Existing			Proposed		
	Rate	Capacity	Lbs/Day	Rate	Capacity	Lbs/Day
Transient	6.37 lbs/capita ⁸ /day	$0c \times 6.37l/c/d = 0l/d$	0	6.37 lbs/capita/day	$38c \times 6.37l/c/d = 242l/d$	242
Office	6.37 lbs/capita ⁹ /day	$35c \times 6.37l/c/d = 223l/d$	223	6.37 lbs/capita/day	$0.0a \times 6.37l/c/d = 0l/d$	0
Tiki Bar	6.37 lbs/capita ¹⁰ /day	$0c \times 6.37l/c/d = 0l/d$	0	6.37 lbs/capita/day	$11c \times 6.37l/c/d = 70l/d$	70
		Total Existing	482		Total Proposed	494

⁸ For the purposes of LOS, "capita" was calculated as *proposed units x persons per occupied unit hotel/motel* using 2x's the Planners Estimating Guide, p. 137: Table 11-1-Basic Impact Coefficients

⁹ Planners Estimating Guide, p. 137: Table 11-1-Basic Impact Coefficients 2.85 persons per 1,000 sq. ft. of general office Space

¹⁰ Capita is estimated by 10 seats with 1 employee

The City currently contracts with Waste Management of Florida, Inc. to collect, transfer and dispose of solid waste and residential recyclables. Commercial recyclables and other non-franchised collection services such as construction and demolition debris and yard waste are available on the open market to all licensed haulers. The City owns and operates a solid waste transfer station on Rockland Key that received 45,402.10 tons of solid waste for disposal and 3,607 tons of recyclables in 2009/10. Waste Management disposes of the solid waste collected in Monroe County, including the City of Key West, at its Central Sanitary Landfill in Broward County. In 2009 Waste Management Inc. reported a reserve capacity of 17 years at this facility. There is therefore an estimated reserve capacity of 15 years as of the date of this report.

As documented above, the City is meeting its Level of Service Standard for solid waste. The City projects a slight permanent population decrease, and only a slight increase in its functional population and non-residential development, during the short and long range planning periods, and the current capacity should remain adequate. Ongoing capital improvements will be necessary to improve standards and service delivery.

Policy 4-1.1.2.D- Recyclable Waste Generation Level of Service

Based on the City of Key West adopted level of service the recyclable waste demand is anticipated to decrease at the end of this single-phase development plan (pursuant to Policy 4-1.1.2.D, the recyclable waste LOS for nonresidential development is 0.25 lbs/capita/day) and the recyclable waste LOS for residential development is 0.50 lbs/capita/day).

The recyclable waste impact is anticipated to be 21 lbs/day

Summary Response: The proposed redevelopment will decrease the expected impact from the existing use of the property by 12 pounds per day; therefore, it is expected that the proposal will have minimal impact on capacity.

Use	Existing			Proposed		
	Rate	Capacity	Lbs/Day	Rate	Capacity	Lbs/Day
Transient	0.5 lbs/capita ¹¹ /day	0c x 0.5 l/c/d = 0 l/d	0	0.5 lbs/capita/day	35c x 0.5 l/c/d = 17.5 l/d	18
Office	0.25 lbs/capita ¹² /day	35c x 0.25 l/c/d = 8.75 l/d	9	0.25 lbs/capita/day	0c x 0.25 l/c/d = 0 l/d	0
Tiki Bar	0.25 lbs/capita ¹³ /day	0c x 0.25 l/c/d = 0 l/d	0	0.25 lbs/capita/day	11c x 0.25 l/c/d = 2.75 l/d	3
		Total Existing	9		Total Proposed	21

Policy 4-1.1.2. E- Drainage Facilities Level of Service

An existing, approved and functional stormwater management system exists on the property. Rainwater from the existing roof will be directed to a new rainwater catchment system constructed at the rear of the existing building. This, in addition to the reduced impervious area and increased landscaping is expected to improve the stormwater management situation on site, reducing the demand on the current system and thus maintaining concurrency in accordance with Policy 4-1.1.2.E; the project shall maintain the Level of Service established in the Comprehensive Plan for drainage facilities

¹¹ For the purposes of LOS, "capita" was calculated as *proposed units x persons per occupied unit hotel/motel* using 2x's the Planners Estimating Guide, p. 137: Table 11-1-Basic Impact Coefficients

¹² Planners Estimating Guide, p. 137: Table 11-1-Basic Impact Coefficients 2.85 persons per 1,000 sq. ft. of general office Space

¹³ Capita is estimated by 10 seats with 1 employee

Existing Level of Service Standard

1. Post development runoff shall not exceed the pre-development runoff rate for a 25-year storm event, up to and including an event with a 24 hour duration.
2. Storm water treatment and disposal facilities shall be designed to meet the design and performance standards established in Chapter 62-25 Section 25.025, Florida Administrative Code, with treatment of the runoff from the first one inch of rainfall on-site to meet the water quality standards required by Chapter 62-302, Florida Administrative Code. Storm water facilities which directly discharge into "Outstanding Florida Waters" (OFW) shall provide an additional treatment pursuant to Section 62-25.025 (9), Florida Administrative Code.
3. Storm water facilities must be designed so as to not degrade the receiving water body below the minimum conditions necessary to assure the suitability of water for the designated use of its classification as established in Chapter 62-302 Florida Administrative Code.

Under the Concurrency Management System, new developments are required to make or provide for improvements necessary to maintain or exceed these standards. This also implements the requirement in the Principles for Guiding Development 28-36.003(1)(a)3 that "Development shall not be approved which is inconsistent with or exceeds the services specified in the (Capital Improvement) Plan."