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INTRODUCTION

The first pioneer settlement in what is now called Leesburg occurred in 1843. This settlement was a 320 acre homestead owned by Thomas Robertson and his son, John Robertson. The homestead was located in the area now comprising the historic downtown section of the City from Lake Griffin to Lake Harris. In 1847, the citrus industry was introduced to the area and became the major agricultural crop until 1894 when a major freeze killed off the citrus trees. The first merchant, and generally recognized founder of Leesburg, was Evander M. Lee who arrived in the area in 1857. Leesburg became a trading center in 1867 as a result of the arrival of the first steamboat on the shore Lake Griffin.

The City of Leesburg was incorporated in 1875. The town limits were Palmetto Street to the east, Ninth Street to the west, Lake Griffin on the north to Lake Harris on the south. Between 1868 and 1881, the town was the County seat of Sumter County. Two railroads extended their lines to Leesburg in 1885 which initiated a period of rapid growth that did not slow until the citrus crops failed in 1894.

In the 40 year period from 1960 and 2000, the City's population grew steadily from 11,172 to 15, 956. Since 2000, the City has experienced significant growth with a 26% increase of population. BEBR estimates for 2008 were 20,093. Single family residential subdivisions comprise the predominant land use, with non-residential uses concentrated along major roadways such as US 27 and US 441. The City's boundary now extends to the Florida Turnpike providing good access to Orlando, Ocala and beyond.

TABLE 1: HISTORIC POPULATION GROWTH IN THE CITY OF LEESBURG

1960	1970	1980	1990	2000	2005	2008
11,172	11,869	13,191	14,903	15,956	17,467	20,093

The City of Leesburg's Comprehensive Plan is its blueprint for existing and future development. The plan's goals, objectives and policies establish the City's strategies for meeting the needs of existing and future residents, businesses and visitors. The Evaluation and Appraisal Report (EAR) is a State mandated update of the Comprehensive Plan. Every local government in Florida is required to conduct an EAR once every seven years. Major components include responding to changes in State growth management requirements, assessing the City's progress in achieving the Comprehensive Plan's goal, objectives and policies, and updating municipal information such as population increases, annexations and land uses. A key component of the EAR however, is the identification of key community specific planning issues that the City will address in the EAR. The intent is that the EAR and Comprehensive Plan are focused on local issues, and are customized for each local government.

On October 5, 2009, the City Commission established the following major issues to be addressed in the EAR:

1. Economic development
2. Development
3. Redevelopment Opportunities
4. Multi-modal transportation
5. Annexation

These major issues will serve as the foundation for the Comprehensive Plan, and the objective of the EAR is to make recommendations to align the Comprehensive Plan to assist the City in meeting these priorities.

The East Central Florida Regional Planning Council, in conjunction with local municipalities and other agencies and partners, has spearheaded the “How Shall We Grow?” initiative in order to develop a shared 50 year vision for the seven county east-central Florida region, which includes Lake County and the City of Leesburg. The vision is based on six regional growth principles: preserve open space, farmland, water resources and regionally significant natural areas; provide a variety of transportation choices; foster distinct, attractive and safe places to live; encourage a diverse, globally competitive economy; create a range of affordable housing opportunities and choices, and; build communities with educational, health care and cultural amenities. It is estimated that the region will have 7.2 million residents by 2050, more than double its current population.

The initiative envisions channeling growth into existing developed areas and fostering redevelopment of these areas as compact mixed-use centers with multi-modal transportation options and densities necessary to support mass transit. It envisions the City of Leesburg as a medium sized city with a population between 50,000 - 99,000. This is consistent with the City’s desires. A guiding principle of the EAR recommendation is to identify mixed use development as the City’s preferred form of new growth and redevelopment, and to move away from development patterns that result in urban sprawl.

The EAR is both a forward and backward looking document. It is backward looking in that it evaluates progress in achieving the goals, objectives and policies in the adopted Comprehensive Plan, and assesses how well the plan has been working. It is forward looking in that it assesses current issues and projected trends, and recommends strategies to address these issues and trends over future planning periods. The end result is intended to be a Comprehensive Plan to meet the needs of the City of Leesburg as it is now and intends to become in the future.

ANALYSIS OF ISSUES

CHANGES IN POPULATION

Population projections are an important component of the Comprehensive Plan. They provide the statistical framework for the future development of the City, and for determining its ability to ensure the provision of key infrastructure and services at adopted levels. Population growth is projected to continue in Leesburg, and as a result there will continue to be an increased demand for urban services and facility that are needed to maintain and improve quality of life.

Section 163.3191(2)(a), F.S., requires the EAR to analyze population growth and changes in land area, including annexations, since the adoption of the original plan or the most recent updated amendment. The City of Leesburg adopted its first comprehensive plan in March 1992, and amended the plan in September 2003. Subsequent updates to the Conservation Element were made in 2004, to the Aquifer Recharge, Capital Improvements, Future Land Use, Intergovernmental Coordination, Potable Water, Sanitary Sewer and Traffic Circulation elements in 2005, and to the Aquifer Recharge, Capital Improvements, Conservation, Future Land Use, Intergovernmental Coordination, Potable Water and Sanitary Sewer elements in 2009.

The City’s population grew from 15,956 in 2000 (US Census 2000) to 20,093 in 2008 (BEBR estimate); a growth rate of 26% for eight years or an average of 3.25% per year. Based on the population projections of the City’s comprehensive plan prepared in 2003, the population projection was 27,366 for 2008. The population projections were prepared based on the assumption that population growth would occur due to the City annexing large areas outside its boundaries and recently approved development plans. Furthermore, the construction of the Florida Turnpike interchange was anticipated to improve accessibility to the City. Therefore, the City’s population growth was expected to start experiencing a faster pace of growth in the next few years. The increased growth rate of an average of 3.25% per year over the past eight years is significantly higher than the average annual growth rate the City experienced between 1960 and 2000 which was an average annual growth rate of 0.9% per year.

TABLE 2: CITY OF LEESBURG POPULATION ESTIMATES AND PROJECTIONS

Year	Population	Growth Rate
1960	11,172	
1970	11,869	6%
1980	13,191	11%
1990	14,903	13%
2000	15,956	7%
2008	20,093	26%
2010	21,675	8%
2015	29,525	36%
2020	38,252	30%
2025	46,752	22%
2030	55,979	20%
2035	65,710	17%

CHANGES IN LAND AREA

Based on the adopted 2003 comprehensive plan, the total area of the City was approximately 16,848 acres in 2002. By October 2009, based on annexation ordinances, the land area of the City had grown to 23,609+/- acres, a 40% increase since mid 2002. Information from the City’s GIS department indicates that the City area extends to 24,724 acres.

Due to the location of the City between Lake Eustis and Lake Harris to the northeast and southeast, the cities of Tavares and Fruitland Park to the east and north, and the County boundary to the west, the City’s primary area for future growth is to the south. As shown on Map 1, this is where the majority of recent annexations have taken place.

Appendix A contains a table that lists annexations into the City from June 2002 to September 2009. The City annexed approximately 6,761 acres during this timeframe. As shown in the table, the City annexed the largest amount of land in 2007 approximately 35% of the total land annexed.

Existing Land Uses

Based on information from the City’s GIS Department, the City’s corporate limits cover a total area of approximately 24,723.9 acres as of September 2009. Existing land uses in the City are shown in on Map 2 and detailed by acreage on Table 3 below. Please note that the discrepancy between the total acreage in the corporate limits and the total acreage in existing land uses in the table below is most likely due to the exclusion of rights-of-ways.

TABLE 3: CITY OF LEESBURG EXISTING FUTURE LAND USE

Future Land Use	Acres
Estate	2,155.3
Low Density	2,403.5
Residential Low Density	5.3
Medium Density	83.5
Residential Moderate Density	3.3
High Density	665.2
Residential High Density	17.8
Mixed Low Density Residential	2210.4
Downtown Mixed Use	26.5
Commerce	239.0
General Commercial	1,065.0
Industrial	1532.8
Institutional	2847.0
Public	804.0
Recreation	178.2
Lake County Rural	3,538.0
Lake County Suburban	297.8
Lake County Urban Expansion	229.3
Lake County Urban	297.7
Lake County Urban 22	2.1
Lake County Commercial Corridor	64.0
Lake County Employment Center	121.0
Lake County Neighborhood Activity Center	38.9
Lake County Regional Commercial	161.7
Lake County Institutional	74.6
Lake County Public Resource	1.0
Rights of Way	1,392.1
Conservation	4,269.0
Total	24,723.9

Single family development is the primary land use, encompassing 4,651+/- acres (19%) of the total land area. Most of this development is located in residential subdivision and approximately 43 percent of the City's housing stock was built after 1990. A recent trend in new housing provision in the City has been the development of multi-family developments which now account for approximately 3% of land area. With the City moving towards more sustainable mixed use developments, approximately 9% of the City is now designated for mixed use development.

Approximately 1,304 acres (5%) of the City's developed land area are in commercial uses. Commercial developments are primarily located in areas fronting onto major roadways such as US 27 & US 441, Lake Square Mall and in the historic downtown area. Much of this commercial development is typical of suburban development patterns, including big box retail and strip shopping centers.

Industrial uses extend to 1,533 acres, approximately 6% of the developed area. Industrial development in the City includes wholesale commercial use, manufacturing and warehouses. The predominate industrial areas are located to the west of the City.

Approximately 178 acres (0.7%) within the City are used for recreational purposes, including City parks and private recreational facilities. In addition, 4,826 acres (19%) remain with Lake County designation, primarily land which has annexed into the City and awaiting a future land use amendment. A total of 4,269 acres (17%) are preserved from development for conservation purposes, primarily wetlands.

VACANT LAND FOR FUTURE DEVELOPMENT

The 2003 Comprehensive Plan indicated that the City of Leesburg had approximately 7,190 acres of undeveloped and vacant land in 2001. This accounted for almost 43% of the City’s land area. Based on data available from the City’s Community Development Department, the City has approximately 5,760 acres of vacant land in 2009.

Table 4 shows the acres of vacant land by future land use category. Approximately 21% of the vacant land has been designated for residential use, 32% for mixed use and commercial uses and 8% for industrial uses. Approximately 38% remains with a County land use designation.

TABLE 4: VACANT LAND ANALYSIS

Future Land Use	Total Acres	Vacant Acres
Estate	2,155.3	863.4
Low Density	2,403.5	231.79
Residential Low Density	5.3	0
Medium Density	83.5	48.98
Residential Moderate Density	3.3	0
High Density	665.2	46.7
Residential High Density	17.8	15.74
Mixed Low Density Residential	2210.4	1649.11
Downtown Mixed Use	26.5	0
Commerce	239.0	98.4
General Commercial	1,065.0	52.5
Industrial	1532.8	453.6
Institutional	2847.0	1.9
Public	804.0	0
Recreation	178.2	0
Lake County Rural	3,538.0	1925.3
Lake County Suburban	297.8	31.3
Lake County Urban Expansion	229.3	161.0
Lake County Urban	297.7	12.5
Lake County Urban 22	2.1	0
Lake County Commercial Corridor	64.0	0
Lake County Employment Center	121.0	80.9
Lake County Neighborhood Activity Center	38.9	0
Lake County Regional Commercial	161.7	0
Lake County Institutional	74.6	0
Lake County Public Resource	1.0	0
Total Developable Land	19,062.8	5673.1
Rights of Way	28.49	
Conservation	4,269	

The Vacant Land Use Map (Map 3) indicates that the City’s vacant developable land is 5,673+/- acres. In addition, the City has 4,269+/- acres (17%) of land assigned the Conservation future land use designation, with very limited development potential.

DEMANDS OF GROWTH ON INFRASTRUCTURE

POTABLE WATER

The City of Leesburg currently owns, operates and maintains a central potable water treatment and distribution system. The City's potable water system provides water for both residential and non-residential purposes, including fire fighting demands. The City has historically been able to provide adequate water service to meet not only the demand within the City's boundaries, but also the demand of the surrounding unincorporated areas.

The City's Utility Service District includes all property within the City limits, as well as surrounding unincorporated areas of Lake County, including Bassville Park, Okahumpka, Highland Lakes, Spanish Village, Silver Lake, and Royal Highlands. The City does not have an interlocal agreement with the County for providing service; however, the City has been working closely with the County to establish and finalize a Joint Partnership Agreement (JPA) to define utility service boundaries.

The City's central potable water system is comprised of five individual systems; the Lake Square Mall Water Treatment System; the Airport Water Treatment Plant; the City of Leesburg Main Water Treatment System; the Highland Lakes Water Treatment System; and the Royal Highlands Water Treatment System. Combined these five systems are comprised of five (5) water treatment plants, fifteen (15) public water wells, two (2) hydrostatic tanks, four (4) above ground storage tanks, and three (3) ground storage tanks. In addition to the WTPs and potable water supply wells, the City operates one (1) Floridian aquifer well which, until reclaimed water is available, provides irrigation water to the existing dual-lined reuse distribution network of the Legacy and Arlington Ridge developments and the Arlington Ridge Golf Course.

The City of Leesburg's 2007 year end potable water demand from the WTPs was 2,558.65 mgal (7.01 mgd) based on water use data submitted to the SJRWMD. Additionally, 375.95 mgal (1.03 mgd) was supplied by the non-potable Legacy well to the reuse water lines. A total of 13,660 residential accounts were serviced computing to a "bedroom" population of approximately 33,660.

The City is in the process of renewing its Consumptive Use Permit (CUP) with the St. Johns River Water Management District and is currently operating under CUP No. 94 issued June 10, 2003. CUP No. 94 allocates the City a maximum annual groundwater withdrawal for the public supply system of 3,333.4 mgal (9.13 mgd).

Review of the City's 10 Year Water Supply Facilities Work Plan (2008 – 2017) indicates that the projected 10-year water demands projected a household per capita use of 140 gallons per capita per day for combined residential water which is lower than the SJRWMD standard of 150 gpcd. The table below provides the projected demands.

YEAR	POPULATION	TOTAL DEMAND (MGD)*	WATER SOURCE	
			GROUNDWATER (MGD)	REUSE WATER (MGD)
2008	35,033	8.04	8.04	--
2009	36,530	8.37	8.37	--
2010	38,027	8.71	7.71	1.00
2011	40,263	9.22	8.06	1.16
2012	42,500	9.73	8.42	1.31
2013	44,736	10.25	8.77	1.48
2014	46,973	10.76	9.13	1.63
2015	49,209	11.27	9.13	2.14
2016	51,137	11.71	9.13	2.58
2017	53,065	12.15	9.13	3.02
2018	54,993	12.6	9.13	3.47

* Projected Water Demands include residential (indoor and outdoor), commercial/industrial, urban landscape, water utility and unaccounted for water uses typical of a public water supply system. The golf course demand currently supplied by Legacy well under the public supply CUP, is not included. After 2009 this demand will be met by reclaimed water.

According to the City's 10 Year Water Supply Facilities Work Plan (2008 – 2017) the City's existing water supply facilities are sufficient to meet both the projected five- and ten-year total water demands. The Capacity Analysis is provided in the table below.

YEAR	TOTAL WATER DEMAND (MGD)	GROUNDWATER (POTABLE) ALLOCATION* (MGD)	TOTAL POTABLE WELL PRODUCTION CAPACITY (MGD) **	WELL PRODUCTION CAPACITY SURPLUS (MGD)	FDEP PERMITTED TOTAL TREATMENT CAPACITY	TREATMENT CAPACITY SURPLUS (MGD)
2008	8.04	8.04	26.27	18.23	22.65	14.61
2010	8.71	7.71	26.27	18.56	22.65	14.94
2013	10.25	8.77	26.27	17.5	22.65	13.88
2018	12.6	9.13	26.27	17.14	22.65	13.52

* An application to renew the City's CUP is currently under review

** Excludes Legacy well (non-potable)

SANITARY SEWER

The City of Leesburg currently owns, operates and maintains a central sanitary sewer system. The City's collection and treatment system provides services to both residential and non-residential users. The City has historically been able to provide adequate sanitary sewer service to meet not only the demand within the City's boundaries, but also within the surrounding unincorporated areas of Lake County and extending to Okahumpka and Royal Highlands.

The City's central sanitary sewer system is comprised of two (2) wastewater treatment plants (WWTP) - the Canal Street Plant and the Turnpike Plant. The Canal Street WWTP has a capacity of 3.5 million gallons per day (mgd) and the Turnpike WWTP has a capacity of 3.0 mgd. Additionally, the City's Turnpike WWTP was designed with the intent to provide reclaimed water service to reduce the amount of potable water utilized for irrigation purposes.

The adopted level of service for sanitary sewer treatment is 251 gallons per capita per day.

The City hired a consultant to prepare the Southwest Service Area (SWSA) Wastewater & Reclaimed Water Master Plan, dated April 2007. The report indicates that due to the anticipated growth within a 20-year horizon in the SWSA which lies primarily south and southwest of Lake Harris and discharges to the Turnpike WWTP that the facility will need to be upgraded to increase the capacity to 7.0 MGD by 2025.

Review of the City's Capital Improvement Plan (2007-2017) indicates that funds are programmed for the construction of the Turnpike WWTP expansion in 2015. Funds are also programmed for the construction of the expansion of the reclaimed water facility in 2017.

STORMWATER MANAGEMENT

To appropriately manage stormwater involves the treatment of stormwater prior to discharge into surface waters, floodwater attenuation to ensure that post-development discharge rates do not exceed the pre-development discharge rates, and design of stormwater facilities to promote recharge to the underlying aquifer systems where applicable. The City maintains the adopted level of service standards by requiring all new development to meet the following level of service standards:

Quality: Compliance with all Florida Department of Environmental Protection and Federal Stormwater standards, as Chapter 17-25, Sections 17-25.025 and 17-25.035 F.A.C., and Chapter 17-302, including Section 17-302.500 F.A.C.

Quantity: The minimum twenty-four (24) hour level of service standards for design storms shall be as follows:

	Years	Hours
Landlocked areas	25	96
Principal arterial bridges	100	24
Other bridges	50	24
Cross drains	25	24
Storm sewers	10	24
Detention/retention structures	25	24
Canals, ditches, roadside swales, or culvert for stormwater external to developments	25	24
Canals, ditches, roadside swales, or culverts for stormwater internal to developments	10	24

The City maintains a stormwater master plan which was developed as a result of a report prepared in 1996. The report included a preliminary analysis of the City's drainage facilities, ranked and identified the major drainage basins, and provided recommendations for program operations. The City has ten (10) major drainage basins – Bently, Carver Heights, Dyches Lake, Lake Hollywood, Montclair, Myrtle Lake, Sunnyside, Tally, Venetian Gardens, and Whispering Pines. Detailed drainage analyses have been completed for Carver Heights, Whispering Pines and Tally basins. Improvements have been made to the Carver Heights drainage basin and grant funding has been approved for the Whispering Pines basin.

The City has also implemented maintenance programs which include street sweeping to remove trash, tree organic materials and pollutant solids from roadways; swale maintenance program which keeps the swales from becoming filled in or blocked; drainage facilities maintenance for removal of sediments and organic material from inlet grates and catch basins; preservation of natural depressional areas and implementation of stormwater best management practices.

To fund needed stormwater improvements, the City initiated a stormwater utility fee. The Capital Improvement Plan identifies a total of \$4 million for basin projects over the next 10 years utilizing the stormwater utility fees. In addition, some \$3.3 million over the next 10 years is allocated to on-going programmed maintenance, rehabilitation, and replacements.

SOLID WASTE

The City of Leesburg provides solid waste collection service to all its residents and businesses within the City limits. The residential refuse/recycling collection is \$19.13 per month with twice a week garbage collection and once a week recycle collection. The City's adopted level of service for residential solid waste disposal is once weekly collection of all residential garbage, yard grass and recyclables, and once a month bulk pickup. The City meets this level of service.

The City does not operate any active solid waste disposal facilities. Processing and disposal of solid waste occurs at the Lake County Resource Recovery Facility through an interlocal agreement with Lake County. This is a solid waste processing plant where certain types of waste are converted to energy through an incineration process. The facility has a design capacity of 163,000 tons per year or 528 tons per day. The majority of the City's waste stream is either recycled or is incinerated at this facility.

Other disposal facilities available to the City include the Lake County Solid Waste Management Facility, the Ash Monifill Landfill, the Construction and Demolition Landfill and Keene Road Landfill.

PARKS AND RECREATION

The City's Parks and Recreation Department provides and maintains City parks and recreation facilities. These include quality athletic fields such as our award winning Sleepy Hollow Sports Complex, Pat Thomas Stadium (home of the Leesburg Lightning), the Susan Street Sports Complex and a community gymnasium. The Department also operates the Venetian Cove Marina, located in Venetian Gardens on the shores of beautiful Lake Harris as well as the Leesburg Historical Museum in downtown Leesburg. Three access points to the Harris Chain of Lakes are provided, one in Venetian Gardens near the marina, another on Lake Harris at Singletary on Hwy 27 South and the third located on Lake Griffin in Herlong Park along Hwy 441. They also offer indoor and outdoor rental facilities ideal for weddings, picnics, birthday parties and other events of all sizes.

The Comprehensive Plan has established the following Levels of Service:

- Overall Park Land: Six (6) acres per 1,000 residents. This standard includes both passive and active developed open space.
- Community Parks: Three (3) acres per 1000 residents
- Neighborhood Parks: Two (2) acres per 1,000 residents.

Community parks are facilities designed to serve the needs of more than one neighborhood. They are intended to serve a minimum of 8,000 City residents and be located no greater than three (3) miles from those residents. The minimum size of any new community parks is established at five (5) acres.

Neighborhood parks are facilities designed to serve an entire neighborhood or area with a minimum of 2,000 City residents and be located no greater than three-fourths (3/4) of a mile from those residents. The minimum size of a neighborhood park is established at two (2) acres.

Mini parks are small parks intended to serve a concentrated or limited population of 500 to 1,000 residents within a radius of ¼ mile. A minimum size of one half (1/2) acre for each stand-alone park is recommended.

Based on the City’s estimated 2008 population of 20,093, the City should provide a total of 120.56 acres of total park land. Of this total, minimum of 60.28 acres should be community parks, and a minimum of 40.19 acres neighborhood parks. A list of the City’s current facilities is set out in Table 5 below. This indicates that the City has a total of 361+/- acres of recreation and open space facilities. In terms of The City therefore exceeds the current level of service in all areas.

In addition, because neighborhood park facilities are included within planned residential neighborhoods, more neighborhood park facilities are provided that shown in Table 5. Additional recreation and open space is also provided in Lake Griffin State Park.

TABLE 5: PARKS AND RECREATION FACILITIES

Parks	Acres	Active/Passive	Resources & Facilities
Community			
Venetian Gardens/Rogers Park/Lake Harris Ski Beach	110	Both	Natural Resources: Lake Harris Recreational Facilities: 1 swimming pool, Playground, 2 sand volleyball courts Other: 14 covered picnic tables, 9 uncovered picnic tables, the Venetian Cove Marina, boat ramps, bath house, Leesburg Community Building, Leesburg Cultural Arts Building, open space, Martin Luther King, Jr. Walkway.
Sleepy Hollow Recreation Complex ⁽³⁾	80	Both	Natural Resources: Wetlands, lake Recreational Facilities: 8 baseball/softball fields, 2 soccer/football fields Other: Picnic tables, restrooms, concessions, maintenance building, walking track
Total	190		
Neighborhood			
Corrine Williams Park	0.3	Active	Natural Resources: None Recreational Facilities: 1 youth playground, 1 basketball court Other: Picnic area
Fountain Lake Park	2.8	Passive	Natural Resources: Pond Recreational Facilities: 1 youth playground Other: 5 covered picnic tables, lighted walking path, open space
Herlong Park	45.8	Passive	Natural Resources: Lake Griffin Recreational Facilities: 1 boat ramp Other: 1 fishing dock, 7 covered picnic tables, parking facility, antique train engine, open space
John L. Johnson Park	1.4	Active	Natural Resources: None Recreational Facilities: 1 youth Playground, 2 basketball courts Other: None
Recreation Complex	11	Active	Natural Resources: 2 indoor regulation basketball and/or volleyball courts, as well as an outdoor basketball court. Other: Restrooms, parking lot,

			recreation offices, meeting facilities and playground
Singletary Park	2	Passive	Natural Resources: Lake Harris Recreational Facilities: 2 boat ramps Other: 1 fishing pier, parking facility, open space.
Susan Street Complex	24.5	Active	Natural Resources: None Recreational Facilities: 4 lighted tennis courts, 4 lighted racquetball courts, 2 batting cages, 4 lighted Little League baseball fields, 1 lighted football/soccer field Other: Picnic Area
Berry Park	35	Passive	Natural Resources: Pond with walking bridge Recreational Facilities: Playground Other: 1/4 mile walking path, water fountain, and a covered picnic areas
Canal Street Field	2	Active	Natural Resources: None Recreational Facilities: Babe Ruth size baseball field with lights and 275' fences; also includes an outdoor hard-court area
Canal Street Trail	2	Passive	Natural Resources: None Recreational Facilities: None Other: Hiking & biking trail
Lake William & Lake Mary Park	21	Passive	Natural Resources: Lakes Recreational Facilities: None Other: Walking path
Leesburg Dog Park	N/A	Passive	Natural Resources: Lakes Recreational Facilities: None Other: Parking lot, rinse station, water stations, shade structures with picnic tables, doggie fire hydrants, separate areas for large and small dogs
Monkey Island (Located off of Venetian Gardens in Lake Harris)	0.54		Natural Resources: Small island accessible by water only Recreational Facilities: None Other: Picnic shelter
Total	148.34		
Mini Parks (1)			
Main Street Mini-Park	See Note (2)	Passive	Natural Resources: Open Space Recreational Facilities: none Other: Bench
Perkins/Johnson Mini-Park	See Note (2)	Passive	Natural Resources: Open Space Recreational Facilities: None Other: Bench
Sunshine/Webster Mini-Park	See Note (2)	Passive	Natural Resources: Open Space Recreational Facilities: None Other: Bench
Towne Square	See Note (2)	Passive	Natural Resources: None Recreational Facilities: None Other: Benches, Streetscape
Special Use Facilities			
Dabney Pool	1	Active	Natural Resources: None Recreational Facilities: 1 swimming pool Other: Bath house

Mote-Morris House	1.6	Passive	Natural Resources: None Recreational Facilities: None Other: Historic home for public use.
National Guard Armory	0.3	Active	Natural Resources: None Recreational Facilities: 1 indoor basketball court Other: Meeting facilities
Palmetto Street Tennis Courts	1.2	Active	Natural Resources: None Recreational Facilities: 4 lighted tennis courts Other: None
Pat Thomas Stadium/Buddy Lowe Field	6.5	Active	Natural Resources: None Recreational Facilities: 1 Babe Ruth League baseball field Other: None
Shuffleboard Complex	1.7	Active	Natural Resources: None Recreational Facilities: 24 lighted shuffleboard courts Other: Clubhouse
Total	13.5		
School Recreation Facilities Available to the Public			
Carver Middle School 1200 North Beecher St.	N/A	Active	Recreational Facilities: 1 softball field
Leesburg High School 1401 West Meadows Dr.	N/A	Active	Recreational Facilities: 1 football/soccer field, 1 regulation baseball field and 1 regulation softball field

(1) Neighborhood parks also serve as mini-parks for the immediate neighborhood.

(2) Acreage for mini-parks is not available. These parks are based on service area rather than population served.

TRANSPORTATION

Historically, the City fulfilled a role as a trading center based on steamships and the railroad. Today the City's location at the intersection of three arterial roadways: US 27, US 441 and SR 44, access to the Florida Turnpike, and Leesburg International Airport provide opportunities for this role to be expanded.

The City's roadway transportation network consists of three main arterial routes:

- US 27 is the major north-south arterial.
- US 441 runs from southeast to northwest.
- SR 44 is the major east-west roadway.

The transportation network also includes internal collectors and local roads. In particular CR 470 connects US 27 with the Florida Turnpike which provides access to I-75 and I-4. The connectivity of the road network in Lake County is constrained by the numerous lakes and wetland systems. Leesburg experiences difficulties with north-south connectivity due to Lake Harris and the extensive wetland system to the west of US 27.

Transportation planning in the City of Leesburg is coordinated between the City, the County, the Lake-Sumter Metropolitan Planning Organization (MPO) and the Florida Department of Transportation (FDOT).

Transit

Public transit plays a key role in a transportation system. It removes vehicles from the system by providing an alternative mode of travel.

The City of Leesburg does not provide fixed-route public transit service, however, Lake County started a fixed-route transportation service LakeXpress, in May 2007 that runs from Lady Lake to Mount Dora with circulator routes in the cities of Leesburg and Mount Dora. The service runs every hour Monday through Friday from 6.00 a.m. to 8.00 p.m. Buses do not run on Saturdays, Sundays and the major holidays.

The fixed-route service is designed to make daily commutes along U.S. Highway 441 hassle free. In years to come, it is hoped to expand the service to other urban areas of the County. Route 1 connects Lady Lake with Eustis and passes through Leesburg. Route 2 is a circulator route in Leesburg with passes through the Downtown area and established neighborhoods to the west of US 27.

Bicycle & Pedestrian

Bicycling and walking are healthy and efficient modes of transportation for short trips. The availability of bicycle and pedestrian facilities is an important factor in encouraging transit use. The success of transit is dependent upon the ability of people to walk or cycle to the transit stops. This presents positive benefits to the transportation system, and is an indicator of a livable community. Additional benefits include improvements to personal health, to the environment as traffic congestion is reduced, and to the quality of life. In communities that have a good pedestrian and bicycle network, considerable shares of short vehicular trips are substituted by bicycle and pedestrian trips. Additionally, bicycling and walking offer the potential for recreation and positively contribute to the aesthetics of neighborhoods.

The City has placed considerable importance on developing trails and connections for people to bicycle around the City and to neighboring communities. Railroad right-of-way was acquired through the Rails to Trails movement for the development of The City of Leesburg Downtown Multi-Purpose Trail and a linear park. The Downtown Multi-Purpose Trail is three-quarter mile trail that will form part of the connection between the TAV-LEE Trail and the Leesburg-Okahumpka Trail, an interconnecting loop within the planned Central Florida Loop Trail System. The TAV-LEE Trail when completed will be a bike/pedestrian trail that will connect Leesburg and Tavares. Much of the trail has been incorporated into the widening of U. S. Highway 441. The Downtown Multi-Purpose Trail is being designed to accommodate individuals who want to walk, hike, jog, bicycle, or roller skate.

Level of Service

The FDOT establishes minimum LOS standards for roads that are part of the state highway system. FDOT has set LOS D for State freeways and principal arterials, and LOS E for State minor arterials. Lake County has set an LOS of E for County maintained arterial and collector roadways. The City of Leesburg's Comprehensive Plan adopts LOS D for arterial and collector roadways and LOS C for limited access highways (or as otherwise established by FDOT).

Roadway Needs

The 2025 Lake Sumter Long Range Transportation Plan, approved in May 2007, identified the need to widen a number of roads in the Leesburg area, including US 27, CR 470 and CR 48. In addition, the need for a new north-south connector running to the west of US 27 was identified. The need for sidewalks on parts of US 27, CR 470 and SR 44 were identified.

Transportation Concurrency Management & Exception Areas

Transportation Concurrency Management Areas (TCMAs) are permitted by the Florida Department of Community Affairs as a way to allow development while managing concurrency. TCMAs are used as an alternative to Transportation Concurrency Exception Areas (TCEAs), which allow development without managing concurrency. In some cases, community redevelopment districts and infill development areas have been exempted from

transportation concurrency requirements by being designated as TCEAs. In 2005, the State adopted Senate Bill 360, which tightened requirements for managing transportation concurrency in TCEAs, and required the inclusion of proportionate fair share mitigation options to address transportation system deficiencies as a component of the Concurrency Management System. The City has not established any TCMAs or TCEAs.

FINANCIAL FEASIBILITY OF FUTURE INFRASTRUCTURE

In 2005, the State of Florida amended its growth management requirements to address the financial feasibility of local government comprehensive plans. Development of the City's Capital Improvements Program (CIP) requires analysis of needed capital projects with projected revenues to determine if sufficient funds will be available to pay for needed improvements in the year(s) that projects are scheduled. Only those projects that are funded, or projected to be funded, in a future year are to be included in the CIP. The City is currently waiting on adoption of the Five-Year Schedule of Capital Improvements from FY2009-2010 through FY 2013-2014.

LOCATION OF DEVELOPMENT

The 2009 Future Land Use Map (Map 2) indicates that the predominant land use within the City is residential, with approximately 26% of the land identified for residential use. Commercial and industrial land uses account for approximately 13% of the total City area and are located along the main transportation corridors (US 441, US 27 & SR 44).

TABLE 6: CHANGES IN FUTURE LAND USE 2002-2009

Existing Future Land Use	Acres 2002	% of Acres	Acres 2009	% of Acres	% Change 2002-2009
Residential	4,716	28%	6,261	26.4%	-1.6%
Mixed Use	26	0.2%	2,237	9.4%	9.2%
Commercial	976	5.8%	1,340	5.6%	-0.2%
Industrial	1,248	7.4%	1,677	7.1%	-0.3%
Institutional	2,824	16.8%	2,854	12%	-4.8%
Recreation	184	1.1%	178	0.7%	-0.4%
Public			803	3.4%	3.4%
Lake County Designation	3,411	20.3%	3,096	13%	-7.3%
Conservation	3,463	20.6%	5,223	22%	1.4%
Water Bodies			46	0.2%	0.2%
ROW			29	0.1%	0.1%
Total	16,848				

The comparison of acreage from 2002 to 2009 shows that while there has been a small decrease in single use residential land, there has been a significant increase in land available for mixed use projects, demonstrating the City's move towards a more sustainable development pattern. In addition, the amount of land set aside for conservation has increased as environmentally sensitive lands have been annexed into the City. Approximately 13% of the land area still awaits a City land use designation.

COORDINATION WITH PUBLIC SCHOOLS

The City of Leesburg entered into an interlocal agreement for school facilities planning and siting with Lake County School Board, Lake County and the other municipalities in Lake County (Astatula, Clermont, Eustis, Fruitland Park, Groveland, Howey-in-the-Hills, Lady Lake, Mascotte, Minneola, Monteverde, Mount Dora, Tavares and Umatilla) in December 2006. This agreement was amended and adopted as required by Sections 163.3177 and 163.3180(g), F.S.

As required by Florida Statutes (Section 163.3177(12),F.S.), all local governments must adopt a Public School Facilities Element (PSFE) consistent with the school board and other jurisdictions in Lake County. The City of Leesburg adopted the PSFE at the City Commission meeting on December 22, 2008. The City also amended the Capital Improvements Element at the same meeting.

Leesburg is included in both Concurrency Service Area #9 and Concurrency Service Area #10. Within CSA#9 there are three elementary schools (Beverly Shores, Fruitland Park and Rimes Elementary Schools), one middle school (Carver Middle School), and one high school (Leesburg High School). Within CSA#11 are Leesburg Elementary School and Oak Park Middle School. A new elementary school is planned for the area, the timing of which is subject to the growth of new development in the south Leesburg area.

According to the adopted PSFE, the City of Leesburg has adopted an LOS standard of 100% of FISH permanent capacity. In instances where the CORE (dining) capacity is greater than the FISH permanent capacity, the school capacity shall then be increased to that of the CORE (dining) capacity and the level of service maintained at 100% of the school capacity. In no instance shall the school capacity increase more than 125% due to additional CORE (dining) capacity.

Lake County Schools Five Year Facilities Master Plan 2009-2013 indicates only one school as exceeding the adopted LOS: Leesburg Elementary School (CSA#11). However, available capacity exists for elementary students in the adjacent CSA#9. An additional elementary school is planned within this CSA in the future, the timing of which is dependent upon the growth of new development in the south Leesburg area.

COORDINATION REGARDING WATER SUPPLY

Florida law requires coordination between water supply planning and future land use planning in order to ensure an adequate supply of water to support future development. As a result, all local governments subject to a regional Water Supply Plan were supposed to revise their comprehensive plans within eighteen (18) months after the approval of the regional Water Supply Plan. Lake County lies within the St. Johns River Water Management District (SJRWMD) Priority Water Resource Caution Areas (PWRCA). The 2005 PWRCA District Water Supply Plan was approved by the SJRWMD Governing Board on February 7, 2006. Therefore, Lake County and all municipalities located within, including the City of Leesburg, were required to prepare their Ten-year Water Supply Facilities Work Plan and have their comprehensive plan updated by August 7, 2007.

The Ten-Year Water Supply Facilities Work Plan was finalized in September 2009. Applicable objectives and policies were added to the Intergovernmental Coordination, Capital Improvement, Future Land Use, Aquifer Recharge, Potable Water, Sanitary Sewer, and Conservation elements to ensure consistency with the work plan. These objectives and policies were by the Department of Community Affairs (DCA) and a Notice of Intent to find the amendments in compliance was issued by the DCA on December 3, 2009.

CHANGES IN GROWTH MANAGEMENT LAW

Section 163.3191 (2)(f), F.S., requires that the Evaluation and Appraisal Report evaluate relevant changes in growth management laws since the date of the previous EAR or adoption of the Comprehensive Plan, for consistency with the Comprehensive Plan. The current Comprehensive Plan was adopted in 2003 (with minor amendments in 2004, 2005 & 2008). The following summarizes the results of a review of the Comprehensive Plan's current compliance with management laws enacted since the date of adoption.

STATE COMPREHENSIVE PLAN

As noted above, Section 163.191 requires that the Evaluation and Appraisal Report evaluate relevant changes in growth management laws, including the State of Florida Comprehensive Plan, since the date that the City's Comprehensive Development Plan was adopted. In preparing the EAR, the City's Comprehensive Plan was compared with the adopted State of Florida comprehensive Plan (Chapter 187, Florida Statutes).

In 1999, Goal (17), the Downtown Revitalization goal, was renamed the Urban and Downtown Revitalization goal. In addition, nine (9) new policies were added to the goal. The Goal was modified to read: "In recognition of the importance of Florida's vital urban centers and of the need to develop and redevelop downtowns to the state's ability to use existing infrastructure and to accommodate growth in an orderly, efficient, and environmentally acceptable manner, Florida shall encourage the centralization of commercial, governmental, retail, residential, and cultural activities within downtown areas".

The following nine policies were added to the Goal:

4. Promote and encourage communities to engage in a redesign step to include public participation of members of the community in envisioning redevelopment goals and design of the community core before redevelopment.
5. Ensure that local governments have adequate flexibility to determine and address their urban priorities within the state urban policy.
6. Enhance the linkages between land use, water use, and transportation planning in state, regional, and local plans for current and future designated urban areas.
7. Develop concurrency requirements that do not compromise public health and safety for urban areas that promote redevelopment efforts.
8. Promote processes for the state, general purpose local governments, school boards, and local community colleges to coordinate and cooperate regarding educational facilities in urban areas, including planning functions, the development of joint facilities, and the reuse of existing buildings.
9. Encourage the development of mass transit systems for urban centers, including multimodal transportation feeder systems, as a priority of local, metropolitan, regional, and state transportation planning.
10. Locate appropriate public facilities within urban centers to demonstrate public commitment to the centers and to encourage private sector development.
11. Integrate state programs that have been developed to promote economic development and neighborhood revitalization through incentives to promote the development of designated urban infill areas.
12. Promote infill development and redevelopment as an important mechanism to revitalize and sustain urban centers.

Many of the new State Comprehensive Plan policies that broadened the Urban and Downtown Revitalization Goal were addressed in the 2003 Comprehensive Plan update. The Comprehensive Plan contains policies to encourage redevelopment and promote alternative means of transportation.

In 2002, Goal (1) Education and its associated policies were deleted. As a result, all the remaining goals were renumbered. None of these changes relate to land use or growth management.

In 2008, a number of changes were made relating to air quality, reducing carbon emissions and energy saving. A new policy was added under Goal (10) Air Quality to read: "Encourage the development of low-carbon-emitting electric power plants". Goal 11 Energy was revised to read: "Florida shall reduce its energy requirements through enhanced conservation and efficiency measures in all end-use sectors and shall reduce atmospheric carbon dioxide by promoting an increase use of renewable energy resources and low-carbon-emitting electric power plants. A new policy was added under Goal (15) Land Use to read: "Provide for the siting of low-carbon-emitting electric power plants, including nuclear power plants, to meet the state's determined need for electric power generation". Leesburg's Comprehensive Plan will be amended in accordance with this requirement.

STRATEGIC REGIONAL POLICY PLAN

The City of Leesburg falls within the East Central Florida Regional Planning Council (ECFRPC). The ECFRPC adopted its plan in 1998 and it has not been amended. The City's Comprehensive Plan is consistent with the Regional Policy Plan.

CHAPTER 163, FLORIDA STATUTES & ADMINISTRATIVE RULE 9J-5, F.A.C.

An analysis of all of the changes to Chapter 163, F.S., and Administrative Rule 9J-5, F.A.C., that have occurred since the adoption of the plan in 2003. This is provided in tables at Appendices B & C. The changes are listed by year. Each change is assessed for relevance to the City's comprehensive plan. If the change is procedural, optional, or not applicable no element change is needed. If the change is relevant, the Comprehensive Plan was reviewed to determine whether any amendments are needed, or whether the matter is already addressed. Where amendments are needed, these are identified in the tables.

Any necessary amendments identified in these tables will be addressed as part of the EAR-based amendments.

LOCAL ISSUES ANALYSIS

In 1998, the State of Florida revised the statutory requirements for the EAR to allow local governments to base their analysis on the key local issues that they are facing. In order to comply with these requirements, and in recognition of the complicated and diverse range, the City conducted an extensive public involvement process that included:

- Preliminary meeting with City Planning Staff.
- Introduction to the EAR process with City staff from all departments at a DRC meeting. Ongoing coordination with department staff.
- Presentation to City Commission meeting on July 13, 2009 to introduce the EAR process and schedule dates for public workshops.
- August 11, 2009 - Public workshop to consider issues relating to Growth and Development, Future Land Use, Housing and Transportation.
- August 17, 2009 – Public workshop to consider issues relating to Potable Water, Sanitary Sewer, Recreation & Open Space and Aviation.
- September 3, 2009 – Public workshop to consider issues relating to Public Schools, Drainage, Aquifer Recharge and Solid Waste.
- An interagency scoping meeting on September 17th, 2009 attended by representatives of neighboring municipalities and other agencies. This process is detailed in the Public Participation Summary Element of this report.

Based on input received during this process, the City identified five major issues for inclusion in the EAR. These are as follow:

- Economic development
- Development
- Redevelopment Opportunities
- Multi-modal transportation
- Annexation

The City Commission further reviewed the issues at its meeting on October 12. On October 13, 2009, the City provided the Florida Department of Community Affairs (DCA) with a request for a Letter of Understanding regarding these issues, and the City's proposed Scope of Work. On November 17, 2009 the DCA provided a Letter of Understanding agreeing to the proposed issues and Scope.

As per the requirements of Section 63.3191, Florida Statutes, the following is an analysis of the City's identified EAR issues, their impacts, and corrective measures, including plan amendments needed to address these issues.

ISSUE 1: ECONOMIC DEVELOPMENT

As the 2nd largest City in Lake County, the City provides employment opportunities for not only City residents, but the wider community.

The City has identified “strengthening its role as an employment center”, “encouraging businesses to locate within the community”, “encouraging the redevelopment of vacant properties” and “providing economic incentives” as key issues to be examined. Part of this is the role that Leesburg Regional Airport can take in promoting economic development. An important aspect in achieving economic development is ensuring the full range of uses to serve and support the residential population, including employment centers, retail, entertainment and cultural uses, community facilities, recreation and open spaces, and institutional uses.

The City of Leesburg has a full time Economic Development Department to assist businesses that wish to locate or expand in the City. In 1998/1999, the City developed a Strategic Economic Development Plan to define its economic development activities and initiatives. The purpose of the plan was to establish a course of action designed to facilitate a collaborative partnership between the private sector and the City. The Plan recognizes that over the previous decade, the Leesburg and Lake County area had benefitted from a strong local and regional economy. Among the positive findings were: a diversification among the various business sectors, lower housing costs than Orlando, and lower unemployment rate than the State average. Opportunities for improvement included: the need for higher college education attainment, declining older commercial strip centers, lack of available industrial buildings for the 5,000-10,000 sq. ft. user, and high seasonal unemployment rate.

The Strategic Economic Development Plan (SEDP) identified a number of goals, objectives and policies aimed at facilitating economic development in the City. It contains seven (7) objective and sixty-two (62) policies. No updates have been made to the Plan in the 10 years since its inception, and today, the City faces new challenges. Information from the State of Florida Agency for Workforce Innovation indicates that in August 2009, the unemployment rate for Lake County was 11.8%, as compared to the State average of 11.9%, and the US average of 9.6%.

A review of Leesburg data in the 2000 Census and the 2005-2007 American Community Survey indicates an improvement in some economic/labor force characteristics. One objective of the SEDP is to improve the skills of the labor force. Although still below the US average, 76.4% of Leesburg residents now hold a high school diploma or higher certification as compared to 72% in 2000. Similarly, the number of residents with a Bachelor’s degree of high certification rose from 13.6% to 18.3% (US 27%). During the same time period, the median household income (2007 inflation adjusted dollars) increased from \$25,988 to \$35,757. This is however still well below the US figure of \$50,007.

The SEDP’s goals, objectives and policies have been reviewed to identify those with specific implications for the City’s planning programs and/or that they should be addressed in the Comprehensive Plan. Key recommendations and a description of how they should be supported in the Comprehensive Plan are as follows:

Objective 1 and associated policies are focused on reducing the unemployment rate by attracting new businesses. In particular, the City has identified promoting the growth of industries listed in SIC code 20 through 39 (manufacturing), together with industries that pay higher than average wages. Ensuring that the Future Land Use Map contains an adequate supply of lands in districts for these sectors, and the inclusion of policies calling for the provision of development incentives to attract these businesses, are two areas in which this objective can be addressed in the Comprehensive Plan.

Objective 2 and associated policies focus on the diversification of economic growth by attracting the above mentioned industries. In particular, specific industries within SIC code 20-39 are identified as target industries, together with other industries related to medical, communication and research industries. As with Objective 1, the

provision of an adequate supply of land to meet the needs of these different industries can be addressed in the Comprehensive Plan. The Comprehensive Plan may also include policies calling for the provision of development incentives to attract targeted industry clusters to appropriate locations.

Objective 3 and associated policies focus on providing additional educational facilities offering post-secondary education and vocational training. One aspect of this is through the use of the fiber optic cable system. The City has adopted the Public Schools Facilities Element and works closely with education providers. Policies addressing enhancements to the City's technological capacity should be included in the Capital Improvements Element, and specific projects may be included in the Five Year Capital Improvements Schedule.

Objective 4 and associated policies are intended to encourage economic development by focusing on the City's land use policies and regulations, and development incentives. These issues can be addressed in the Comprehensive Plan through policies providing for development/redevelopment incentives and the removal of regulatory barriers. Impact fee assistance can be addressed in policies regarding potential economic development incentives for existing and new businesses.

Objective 5 and associated policies relate to intergovernmental coordination. Policies addressing the City's support of and participation in local and regional economic development initiatives should be included in the Intergovernmental Coordination Element of the Comprehensive Plan.

Objective 6 and associated policies refer to establishing tourism as a component of economic development marketing. Policies which assist in the promotion of tourism may be included in the Comprehensive Plan.

Objective 7 and associated policies relate to increasing the level of public awareness and improving perception of the City's support for economic development. The incorporation of policies supportive of Objective 1-6 in the Comprehensive Plan and the removal or mitigation of regulatory barriers should improve public perception on the City's desire to assist existing and new business development in the City.

The Leesburg International Airport has been designated a Gold Seal Airport by the Florida Department of Transportation, recognizing its high standards for infrastructure, service and safety to the flying public. Located just six miles from Historic Downtown Leesburg and its primary business district and one mile from Lake Square Mall, airport facilities include rental car and courtesy van service, long-term and overnight tie-down rentals, corporate hangers and T-Hangar rental. Hotels and restaurants are close to the airport. The airport features include:

- A GPS for R-13, GPS for R-31 and a Non-Directional (NDB) for R-31.
- Three Non-Precision Instrument approaches.
- A 5,000-foot runway (13/31) and a 4,960-foot runway (3/21).
- DTN - online, real time color weather radar.
- ASOS - located on filed, frequency 134.3

Although the airport has an FBO building which provides a pilot lounge and restroom, it does not have a full service airport terminal.

The City's Comprehensive Plan already contains an optional Aviation Element which specifically addresses the role of the airport as an economic asset to the City. The Airport Master Plan contains a number of recommendations for projects to continue improving the operation of the airport for a period of 20 years from 2001-2021. The projects are broken down into 3 phases:

- Phase 1 – 2001-2006
- Phase 2 – 2007-2012
- Phase 3 – 2013-2022

A number of the projects in phases 1 and 2 have been completed, including the construction of an Air Traffic Control Tower, the completion of new corporate and T-Hangers, and the extension of taxiways and runway 13-31.

Phase 3 of the project includes a proposed terminal building, a facility which would be necessary to support a charter operator(s) at the airport.

The City has the opportunity to include an optional Economic Development Element. As Economic Development was a major issue identified during the EAR process, and the City has the foundation of such an element in its existing Strategic Economic Development Plan, it is recommended that an Economic Development Element be included within the Comprehensive Plan. The role of Leesburg International Airport in promoting economic development should be addressed in this element.

Social, Economic and Environmental Impacts

Section 163.3191 (2)(e), F.S., requires that the potential social, economic, and environmental impacts of the identified major issues be addressed in the EAR. In summary, major positive social impacts of economic development include: the provision of job opportunities for existing and future residents, the provision of additional opportunities for economic advancement, increased access to goods, services and entertainment options, increased competition with resulting cost savings for consumers, an improved business environment, the provision of additional opportunities for social interaction in the public realm, an improved sense of place and community, increased educational opportunities, and increased economic vitality. Potential negative impacts include: reduced service levels and congestion that might result from increased development, increased competition for existing businesses, and challenges associated with balancing economic development needs and other planning objectives, such as environmental protection, noise and air quality, and water supply.

From an economic standpoint, there are many benefits as economic development results in increased economic vitality, consumer spending power, job opportunities, workforce development, educational options, opportunities for career advancement, an increased tax base, and many other economic benefits. A challenge associated with such efforts is ensuring that existing businesses benefit from economic development programs, and to balance the charge of attracting new business with providing assistance and support to existing local businesses in a changing competitive environment.

From an environmental standpoint, economic development attracts additional development and growth, with resulting impacts on the natural environment. Additional development and redevelopment can diminish the level of open space, disrupt vistas and view corridors, and negatively impact natural resources, including natural and man-made water bodies. In particular, additional aircraft activity can have noise and air quality implications for nearby residential neighborhoods. It is important to ensure that adequate open spaces are maintained and public spaces provided in conjunction with development and redevelopment in the City, and that potential negative impacts of development on the natural environment and local residents, are mitigated through the use of best management practices and other strategies.

The City has the option to include an economic element setting forth principles and guidelines for commercial and industrial development, and for employment and personnel utilization within the area. The element may detail the type of commercial and industrial development sought, correlated to the present and projected employment needs of the area and to other elements of the plans, and may set forth methods by which a balanced and stable economic base will be pursued. The City has the benefit of the International Airport with the potential to bring additional employment opportunities to the City. It is recommended that the City consider the inclusion of an Economic Development Option in the Comprehensive Plan which includes the future role of the airport in promoting economic development in the City.

ISSUE 2: DEVELOPMENT

Population growth and development will continue to be a major challenge facing the City of Leesburg. The City's historic function as an agricultural and trading center characterized its early development patterns: a downtown with a retail oriented "main-street"; community servicing uses such as churches and schools, single family homes; agriculture and open lands, and; uses ancillary and or supportive to agriculture (i.e. citrus processing plant). This small town character is most evident in the old downtown. In more recent years, the suburbanization and the growth of the vehicular road traffic has changed much of the surrounding agricultural and open lands. Single family residential subdivision now comprise the predominant land use, with non-residential uses concentrated along major highways, primarily US 27, US 441 and SR 44. Most recently, additions to the City boundary in the CR 470 area provide an opportunity to plan new development in a comprehensive manner,

The Evaluation and Appraisal Report and subsequent EAR Amendments provide the City with an opportunity to revisit its prevailing development patterns and to plan for new growth and development, in a comprehensive sustainable manner. Resource protection, maximizing the efficiency of development and redevelopment, ensuring adequate infrastructure, and reducing traffic congestions are among the many challenges that will shape the City's development and redevelopment during the planning period. When strong urban design principles are applied this type of development can be more aesthetically pleasing than typical suburban developments. Promoting compact mixed use development provides for a more diverse range of economic uses in neighborhoods and reduces infrastructure costs.

The City should continue efforts to assist and encourage developers to incorporate high quality urban design concepts and principles into development proposals. The City should consider the development of Urban Design Guidelines to illustrate preferred development concepts and types, and implement a series of incentives to encourage such developments through its land development regulations and other appropriate mechanisms. Density and intensity bonuses for innovative development are currently provided for in the Comprehensive Plan, although they have not been implemented through the Land Development Regulations.

Densities and intensities, and PUD policies, should be revisited through the EAR Amendment process to ensure that the Comprehensive Plan is promoting compact and integrated mixed-use development, and not furthering sprawl and segregated multiple-use development. Holding visioning sessions with the community, and developing an overlay/masterplan for the CR 470 corridor area, will enable the City to address new development through the use of new urbanism principles.

Social, Economic and Environmental Impacts

Section 163.3191(2)(e), F.S., requires that the potential social, economic, and environmental impacts of the identified major issues be addressed in the EAR. In summary, major positive social impacts of population growth and development include:

- The creation of stronger neighborhoods, which in turn strengthens the sense of community and social fabric;
- Opportunities to enhance the quality of life for existing and future residents and visitors by providing increased opportunities for social interaction, reducing automobile dependence, and providing better public space, and;
- The provision of additional economic opportunities.

Potential negative impacts include:

- Reduced service levels and congestion that might result from increasing density without expanding service capacity;
- The encroachment of incompatible uses on existing communities that are essential to healthy development, and;
- Increased school overcrowding.

From an economic standpoint, the development issue has a number of implications. Development increases the tax base, and therefore increases the City's ability to provide services to existing and future residents. Moreover, development attracts new residents and businesses to neighborhoods, creating new jobs for existing residents. Nonetheless, increased development requires the provision of additional and expanded public services and infrastructure, with added public costs. Impact fees, concurrency requirements, and other mechanisms should be in place to ensure that development assumes its fair share of these costs.

From an environmental standpoint planned mixed use developments result in more sustainable development patterns than suburban sprawl, and play an important role in protecting the area's many environmental resources. Within the City, however, development can diminish the level of open space, disrupt vistas and view corridors, and have negative impacts on natural resources, including natural and man-made water bodies. It is important to ensure that adequate open spaces are maintained and public spaces provided in conjunction with development in the City, and that potential negative impacts of such development are mitigated through the use of best management practices and other strategies.

ISSUE 3: REDEVELOPMENT OPPORTUNITIES

Participants at the public workshops recognized that through the various CRAs improvements have been made to neighborhoods. The City currently has three (3) Community Redevelopment Areas.

The Carver Heights CRA was established in 2001. Located in northwest Leesburg, the area extends to approximately 1,200 acres. The impetus to create the CRA was from the recommendations of CDC of Leesburg & Vicinity, Inc. and the Carver Heights Community Advisory Board. The Redevelopment Plan identified five crucial projects:

- Provide a CRA Program Coordinator & establish a CRA Office within the CDC.
- Develop infrastructure and pedestrian support facilities.
- Develop comprehensive recreation program/facilities.
- Develop a commercial and industrial improvement program.
- Develop gateways into the community.

Since the adoption of the Carver Heights Redevelopment Plan, a number of improvements have been achieved. These include:

- A CRA Program Coordinator was hired and an office established. The Coordinator was charged with the task of guiding, facilitating and implementing the Redevelopment Plan. In addition, they would act as a liaison between the CRA, developers, community groups and local citizens.
- The Craver Heights Stormwater Basin Master Plan identified several areas with problems which included flooding and/or water quality. The projects identified in the plan have been completed.
- A comprehensive sidewalk system plan was developed and construction of a portion of the sidewalks within the plan has been completed. Accomplishment of this goal has aided in the safety of pedestrian and bicycle traffic. The remainder of the sidewalks needs to be funded in future years.
- A Master Utility Plan has been developed which identifies substandard collection and distribution lines, additional fire hydrants, lift station upgrades and identification of households needed to connect to the system.
- A Parking, Access, and Traffic Plan was prepared for Griffin Road and Lake County has completed all the road improvements.
- A Comprehensive Recreational Needs Plan has been developed.
- Support the Expansion and Renovation of the Carver Middle and Rimes Elementary Athletic Facilities. Carver Middle School has been completely renovated and enlarged.
- Landscape Design Guidelines have been developed for the community which will improve the visual character of the CRA and the guidelines have been forwarded to the City.
- A Pedestrian Streetlight Plan has been prepared for all streets and will be implemented as the underground eclectic program is implemented.
- A landscape plan was developed for Griffin Road. In addition, the landscaped entry features have been designed.
- Additional playground equipment has been designed on existing parklands within Berry Park.

The US Hwy 441/27 CRA was established 2006. The 2,870+/- acre CRA is located along US Hwy 441 and 27 within the Leesburg City Limits. The CRA boundaries are generally one mile wide from CR 48 to Martin Luther King, Jr. Blvd. and from CR473 to US Hwy 27. The Redevelopment Plan identifies six (6) crucial projects:

- Create a CRA Transportation, Parcel and Aesthetics Master Plan.
- Develop a parking, transportation and access plan for the US Hwy 441/27 corridor.
- Underground utilities.
- Improve streetscape and landscape.
- Create a Development Incentive Program.
- Commercial relocation for those buildings that need renovating.

The City is currently obtaining financing for undergrounding electric utility lines, relocation of City owned electrical distribution and other utility lines and related improvements within the boundaries of the Community Redevelopment Area.

The Greater Leesburg CRA was established in 1998. Though the establishment of this CRA, the City recognized the importance of the downtown and the surrounding residential neighborhoods for the viability of the City as a whole. The proposed improvements identified in the Redevelopment Plan provide a means to enhance the downtown and surrounding neighborhoods that is friendly to pedestrians and motorize alike. The majority of the improvements are infrastructure, housing construction and aesthetics. The plan proposes to use these improvements as the cornerstone of a business and housing development strategy. The Redevelopment Plan contains 10 phases for improvements from 1997 through 2026.

To date, the CRA has undertaken streetscape improvements on Main Street, façade improvements to a number of downtown buildings, and traffic corridor improvements.

As redevelopment and improvements occur in these Community Redevelopment Areas, the City will need to address changing conditions and needs. The Comprehensive Plan may need to be amended to address new issues.

In addition to these Community Redevelopment Areas, the Comprehensive Plan should address other areas where improvements are necessary, particularly vacant lands, infill development opportunities, opportunities for redevelopment of properties on US 441 and in the vicinity of Leesburg Mall, and vacant/unused school sites.

Social, Economic and Environmental Impacts

The social, economic and environmental impact of redevelopment have similar positive and social impacts as new development. In summary, major positive social impacts of redevelopment include:

- The creation of stronger neighborhoods, which in turn strengthens the sense of community and social fabric;
- Opportunities to enhance the quality of life for existing and future residents and visitors by providing increased opportunities for social interaction, reducing automobile dependence, and providing better public space, and;
- The provision of additional economic opportunities.

Potential negative impacts include:

- Reduced service levels and congestion that might result from increasing density without expanding service capacity;
- The encroachment of incompatible uses on existing communities that are essential to healthy development, and;

- Increased school overcrowding.

As with new development, from an economic standpoint, the redevelopment issue has a number of implications. Redevelopment and improvements to an area increase the tax base, and therefore increase the City's ability to provide services to existing and future residents. Redevelopment attracts new residents and businesses to neighborhoods, creating new jobs for existing residents. By concentrating development in areas where public services and infrastructure are already in place, public costs can be reduced.

From an environmental standpoint redevelopment and infill development results in more sustainable development patterns than suburban sprawl. However, a greater intensity of development can diminish the level of open space, disrupt vistas and give rise to noise pollution from competing land uses. As with new development, it is important to ensure that adequate open spaces are maintained and public spaces provided in conjunction with redevelopment in the City, and that potential negative impacts of such development are mitigated through the use of best management practices and other strategies.

ISSUE 4: MULTI-MODAL TRANSPORTATION

According to commuting-to-work data for workers 16 years and over collected in the 2000 Census, single occupant automobile trips account for 73.5 percent of all trips to and from work reported by residents in Leesburg. Carpools account for 18 percent, public transportation for 0.7 percent, walking for 3.5 percent, and other means for 2.0 percent with 1.7 percent working at home. Nearly 80% of workers travelled less than 30 minutes to work, with only 0.8% of those using public transport.

Analysis of the above data indicates a need to promote walking, bicycling, and public transportation as viable modes of travel alternatives to the single occupant automobile. As the City continues to develop and redevelop, there are opportunities to design areas that are more appropriately scaled for pedestrians to encourage residents to use multimodal transportation options. The development of transit, bicycle and pedestrian infrastructure will play a crucial role in maintaining the goals of the City.

The decline in the national economy since 2006 has decreased the number of new housing and business starts, slowed the development rate and pushed congestion estimates further out into the future. However, future growth in Leesburg will continue to have an impact on the transportation network in the City.

Lake Sumter MPO is currently updating the 2025 Transportation Plan to 2035 which provides the opportunity for new transportation initiatives to be addressed. Traditionally, traffic congestion has been addressed by adding more lanes to existing highways. However, it is becoming increasingly difficult to undertake major highway expansions because of funding constraints, increased development costs, environmental constraints and opposition from local groups.

Increasing interest is therefore being taken on how to use existing capacity more efficiently. In order to address the impacts of development on its transportation system, the City must make sure its future land use, transportation and housing elements focus on the promotion of development patterns that encourage alternative modes such as transit and cycling, and improves walkability. However, in order for this to be successful, a full range of multi-modal transportation opportunities need to be available. Additional goals, objectives and policies related to an integrated transportation/land use system are needed in appropriate elements of the plan.

In promoting a more sustainable development and transportation pattern, the City has a number of transportation advantages. It is located at a junction of 2 major highways (US27 & 441), has direct access to the Florida Turnpike and hence I-75, has an international airport with potential for expansion of services, and an existing County public transit system which links to the Leesburg Mall. These facilities provide an excellent basis for the development of multi-modal transportation system. Strategies which the City can focus on to encourage pedestrian, bicycle and public transit use include:

1. Higher residential densities. Studies indicate that residents of higher density urban areas make fewer automobile trips and more than twice as many pedestrian and transit trips as the national average. As an area becomes more urbanized (denser, more mixed, less parking), automobile ownership and use decline and more travel takes place by walking, cycling and public transit.
2. Roadway design. New roads or improvements to existing roads should consider the inclusion of pedestrian and bicycle lanes/paths, on-street parking if appropriate, medians and pedestrian-friendly crosswalks. Roads, sidewalks and bicycling facilities should be designed in a way that allows maximum integration with each other and with transit facilities.
3. Pedestrian and Bicycle Master Plans. Such plans can help focus attention on the provision on pedestrian and bicycle facilities as new development and redevelopment occurs, ensuring that secure attractive

sidewalks, crosswalks, paths, and accessories such as bike racks are taken into account in the early planning stages.

4. Provide Safe and Comfortable Public Transit Facilities. Studies have shown that in order for persons to use public transit facilities, they need to be clean, safe and efficient, and include facilities where passengers can wait in comfort. Such facilities should be developed as street designs are developed and private developments are approved. Amenities such as attractive transit stops and shelters, loading spaces for transit buses, and bicycle should be incorporated into the design of new developments.
5. Innovative work practices. Although not within the remit of the City control, work practices such as flexible work hours and telecommuting can reduce daily automobile trips for employees, as well as carpooling programs and public transit. Opportunities should be explored for ways in which the City can support such private initiatives.

Social, Economic and Environmental Impacts

Section 163.3191(2)(e) of the Florida Statutes (F.S.) requires that the major issues and the potential social, economic, and environmental impacts be identified. The previous section of this report described specific impacts of the transportation issue. The transportation system of the City of Leesburg is oriented towards the automobile. The growth of the City and surrounding areas in Lake County with the subsequent demand on the transportation network has increased traffic congestion. More bus routes could ease some of the traffic congestion in the City. In addition, extending the coverage area and inter-connecting routes with those of neighboring municipalities to the south and west could lessen road congestion.

Traffic congestion has negative impacts such as:

- Wasting time of motorists and passengers. As a non-productive activity for most people, congestion reduces regional economic and environmental health.
- Delays, which may result in late arrival for employment, meetings, education etc. - resulting in lost business, disciplinary action or other personal losses.
- Inability to forecast travel time accurately, leading to drivers allocating more time to travel "just in case", and less time on productive activities.
- Wasted fuel increases air pollution owing to increased idling, acceleration and braking. Increased fuel use may also in theory cause an imperceptible rise in fuel costs.
- Wear and tear on vehicles as a result of idling in traffic and frequent acceleration and braking, leading to more frequent repairs and replacements.
- Stressed and frustrated motorists, encouraging road rage and reduced health of motorists.
- Emergencies: blocked traffic may interfere with the passage of emergency vehicles traveling to their destinations where they are urgently needed.
- Spillover effect from congested main arteries to secondary roads and side streets as alternative routes are attempted, which may affect neighborhood amenity and real estate prices.

Attempting to reduce congestion by widening roads or creating new ones, although feasible, only encourages more traffic congestion. Expanding alternative modes of travel and coordinating them with better land use strategies may reduce automobile congestion on the roadways of the City of Leesburg. The current focus should be on the improvement of the transit system to provide incentives for people to not use cars. Additionally, the installation of more shade trees would diminish the adverse impact of pollutants on the environment as well as shelter the residents of the City from the Central Florida Climate.

ISSUE 5: ANNEXATION

The City has been discussing the establishment of a Joint Planning Area with Lake County since 2002/3. In 2003 a proposed five-year Joint Planning Agreement required the City and the County to provide information to each other on proposed development activity located in a defined Notification Area. The Agreement also depicted the potential growth area where the City could annex in the next five years, and depicted a Leesburg-Tavares Joint Service Area located between CR 473 and Haines Creek. This Joint Service Area would allow annexation of this area by either jurisdiction based on who provided utilities to support the development.

1. Additional major issues addressed in the agreement included:
2. Limiting the area in which the City may annex within the next five years.
3. The orderly and appropriate development of utilities.
4. Providing for the creation of a Land Development District overlay by the County for the unincorporated Joint Planning Area.
5. Providing for the transfer of roadway and associated infrastructure when property is annexed.
6. Creating a process for either government to express concerns about a specific development.

On December 8, 2003, the City Commission approved the JPA Agreement with Lake County via Resolution Number 6995. In March 2004, a joint Leesburg City Commission/Lake County Commission meeting was held to discuss the proposed JPA Agreement. The consensus of the County Commission was not to move forward with the JPA, but to wait for the outcome of the current legislative session.

At that time there were also issues discussed that had been raised by the Hawthorne Development. The conclusion of the legislative session did not result in any revisions to the Annexation regulations. Additionally, City and County staff had continued to discuss the concerns of the Hawthorne Development and the JPA map was revised to delete the existing Hawthorne residential community from the JPA area. In addition, City staff had received inquiries on several parcels in the 470/Turnpike area that were not included in the original JPA area. After discussion with the County, the JPA was revised in this area to include the properties in question. Although the City Commission supported the proposed changes to the proposed JPA area, no progress has been made with Lake County on taking this forward.

The Proposed JPA Area is shown on Map 4. This indicates some overlap with adopted Utility Service Areas and JPAs proposed by other Cities. At this time, there is no ongoing discussion with adjacent cities to resolve areas of overlap and develop joint planning agreements.

The development of Joint Planning Agreements between the City of Leesburg, Lake County and neighboring cities (Tavares, Howey-in-the-Hills, Groveland, Mascotte and Fruitland Park) would provide better land use planning coordination in a rapidly development part of Lake County. Planning for development in these areas would better provide for transition areas adjacent to the City Limits. The JPA should include standards to ensure appropriate transitions between rural and urban uses within and adjacent to the transition areas, and address procedures to ensure consistent development standards, including rights-of-ways and roadway requirements. The JPA should also provide for the annexation of enclaves into the City upon the consent of the property owner or transfer of fee ownership.

Social, Economic and Environmental Impacts

Section 163.3191(2)(e) of the Florida Statutes (F.S.) requires that the major issues and the potential social, economic, and environmental impacts be identified. The development of Joint Planning Agreements with Lake County and neighboring municipalities would enable the areas adjacent to existing urban areas to be planned for with in a more sustainable development pattern that would reduce suburban sprawl and help protect the areas environmental resources. Furthermore, such an agreement would have a positive economic impact for both the City, the County, and neighboring municipalities through the more efficient provision of infrastructure and services within the area.

OTHER ISSUES

Communities for a Lifetime

The Florida Department of Elder Affairs is promoting the Communities for a Lifetime initiative in order to encourage local governments to plan and implement improvements for residents at all stages of life and abilities, including children, families, and persons with disabilities, empty nesters, and senior citizens. Addressing the needs of and providing opportunities for all residents is an important element in planning for the future development of the City. Key components of the Community for a Lifetime concept that the City should address through the planning process include:

- Ensuring access to individuals of varying abilities and stages of life in housing, public spaces, community facilities, places of employment and commercial establishments.
- Providing for granny-flats, mother-in-law suites, and necessary apartment in residential areas, and ensuring the availability of housing types appropriate to various age and needs groups, including families with children, multi-generational households, young and/or single adults, empty nester, and senior citizens. Regulatory barrier that prevent the provision of such housing types should be removed or mitigated.
- Transportation – Providing persons and households at various life stages and abilities with access to appropriate transportation modes, including pedestrianization, bicycles, automobiles, mass transit, and special needs transportation services (i.e. school buses, special needs vans, shuttles, etc).
- Ensuring timely access to health care facilities, and opportunities to pursue healthy living though age appropriate recreational opportunities.
- Providing opportunities for education, recreation, arts and cultures, and leisure activities for residents and households of various age and interest groups.
- Architectural building standards to ensure that interior features are accessible and safe to all ages.

Natural Area Protection of Low Impact Development Techniques

Recent changes in Chapter 163, F.S. require the City's Comprehensive Plan to be based upon energy-efficient land use patterns accounting for existing and future energy electric power generation and transmission systems and to be based upon greenhouse gas reduction strategies.

The implementation of low impact development techniques and green building standards reduce the negative environmental impacts of development and redevelopment by:

- Reducing building footprints to the maximum extent feasible, and locating building sites away from environmentally sensitive areas;
- Promoting the preservation of resources;

- Providing for on-site mitigation of impacts (i.e. retention and treatment of stormwater runoff, water reuse);
- Promoting energy conservation through design, landscaping and building techniques (i.e. solar power, increased tree canopies);
- Promoting water conservation through landscaping and building design;
- Ensuring environmentally friendly building practices (i.e. use of environmentally friendly building materials, recycled materials), and;
- Other techniques

A number of cities throughout the State and nation have adopted green building ordinances and standards to require and/or encourage more environmentally friendly development. The U.S. Green Building Council has developed the Leadership in Energy and Environmental Design (LEED) Green Building Rating System in order to provide a nationally accepted standard for the implementation and use of green building techniques. LEED Certification programs provide a mechanism for monitoring and incentivizing the use of green building techniques by new development and redevelopment. The City should consider the development of a Green Building Ordinance and a related LEED Certification Program for development and redevelopment as a key component of its planning program, including the development of a Neighborhood Development Rating System that integrates the principles of smart growth, urbanism and green building into a national system for neighborhood design.

Protocol for Assessing Community Excellence in Environmental Health (PACE)

The Florida Department of Health is working with communities throughout the State to assess and address the linkage between environmental health, land use, and local planning programs. The Protocol for Assessing Community Excellence in Environmental Health (PACE) initiative identifies strategies to address the negative public health implications that result from slum and blight conditions, including abandoned and dilapidated properties, infrastructure deficiencies, water quality, localized pollution, public safety, and crime. In addition, PACE recognizes the positive public health implications that result from sound urban planning, including increased access to open space and recreational opportunities, the provision of non-motorized transportation modes such as pedestrianism and bicycles, adequate infrastructure, crime prevention through environmental design, and improved environmental quality. The City of Leesburg should consider the public health implications of development and redevelopment proposals as a component of its planning program, and the feasibility of implementing a local PACE demonstration project in coordination with the State and Lake County Health Department.

Neighborhood Planning and Public Involvement Strategies

Ensuring adequate public participation in planning programs is a major challenge for the City of Leesburg. The City should continue to coordinate with homeowners associations and neighborhood groups in order to provide opportunities for input in planning programs and development and redevelopment proposals. In addition, the City should seek to identify mechanisms to facilitate input from residents of neighborhoods that are not within the purview of a homeowners association or adequately represented by other established neighborhood groups. These residential neighborhoods tend to be older areas that were not developed as part of a modern subdivision or Planned Unit Development, such as the residential component of the Old Downtown.

INDIVIDUAL ELEMENT ASSESSMENTS

This section provides a summary assessment of each plan element, which includes a description of the successes that have been achieved and the shortcomings that have hindered complete implementation of the Comprehensive Plan. Recommendations are then provided to address any shortcomings that have been identified. A review of the goals, objectives and policies (GOPs) for each plan element has been undertaken to determine if the City accomplished the GOPs and whether the GOPs are still relevant or need to be amended to reflect more current conditions and priorities during the EAR-based amendment process. When a policy referenced the City's Land Development Regulations (LDR) as an implementation tool, the City verified whether the LDR included the necessary regulations.

AQUIFER RECHARGE ELEMENT

Objective 1.1 Recharge Area Protections. Objective 1.1 calls for the coordination with other agencies and continuation of the enforcement of the Code of Ordinances to ensure protection of the City's natural recharge areas.

The policies under Objective 1.1 were reviewed in order to determine their continued relevance and applicability. Table AR1 below summarizes the results of this review.

TABLE AR1 AQUIFER RECHARGE ELEMENT OBJECTIVE 1.1 POLICY REVIEW

Policy	Relevant
Objective 1.1 Recharge Area Protections. The City of Leesburg shall coordinate with other agencies and continue to enforce measures in the Code of Ordinances ensuring protection of the City's natural recharge areas from potential pollution sources.	Yes
Policy 1.1.1. In an effort to eliminate potential sources of groundwater pollution, the City in cooperation with the FDEP, will require abandoned or leaking tanks containing substances harmful to the environment (petroleum, pesticides, etc.) to be removed, repaired, or otherwise neutralized by the landowner.	Yes
Policy 1.1.2. The City shall continue to prohibit land uses within specific distances from public water supply wells that could have negative impacts on groundwater quality.	Yes
Policy 1.1.3. The City shall prohibit generators of large quantities of hazardous waste, as designated by the U.S. Environmental Protection Agency (EPA) and the FDEP, from within those areas designated as High Aquifer Recharge areas (greater than 12 inches of recharge per year), see Map VIII-2.	Yes

Objective 1.2 Groundwater Recharge. Objective 1.2 calls for enforcement of the Code of Ordinances to maximize recharge to the aquifer.

The policies under Objective 1.2 were reviewed in order to determine their continued relevance and applicability. Table AR2 below summarizes the results of this review.

TABLE AR2. AQUIFER RECHARGE ELEMENT OBJECTIVE 1.2 POLICY REVIEW

Policy	Relevant
Objective 1.2 Groundwater Recharge. The City of Leesburg shall enforce measures in the Code of Ordinances for the purpose of maximizing recharge to the underlying aquifer.	Yes
Policy 1.2.1. The stormwater management section in the Code of Ordinances shall require retention and recovery by infiltration of stormwater runoff in areas of high groundwater recharge potential in order to maximize groundwater recharge.	Yes
Policy 1.2.2. The City shall continue to enforce the following maximum impervious surface ratios within high recharge areas: <ul style="list-style-type: none"> ▪ 80% maximum coverage for commercial uses outside the CBD core ▪ 100% for commercial uses within the CBD core ▪ 80% for industrial uses ▪ 50% for residential uses 	Yes
Policy 1.2.3. The City shall continue to coordinate with Lake County, St. Johns River Water Management District, and state and federal agencies to achieve regional aquifer recharge protection objectives.	Yes

Objective 1.3 Groundwater Conservation. Objective 1.3 addresses groundwater conservation by implementing best management practices.

The policies under Objective 1.3 were reviewed in order to determine their continued relevance and applicability. Table AR3 below summarizes the results of this review.

TABLE AR3. AQUIFER RECHARGE ELEMENT OBJECTIVE 1.3 POLICY REVIEW

Policy	Relevant
Objective 1.3 Groundwater Conservation. The City will recognize the underlying aquifer as a finite and delicate resource thereby necessitating the best management practices to promote groundwater conservation.	Yes
Policy 1.3.1. The City shall adopt a local Florida Friendly Landscape ordinance prepared with consideration to the St. Johns River Water Management District's "Standards for Landscape Irrigation in Florida" document, which is based on the District's model landscape ordinance and shall promote, through educational programs and publications, the use of Florida friendly landscaping practices, which include low or no water landscaping, the use of solid waste composts, efficient irrigation systems, and the prohibition of exotic plant species, which will result in the conservation of water.	Yes
Policy 1.3.2. By 2003, the City will initiate and maintain a leak detection and repair program for its potable water utilities.	The City maintains a leak detection program, therefore, the policy needs to be revised to delete date
Policy 1.3.3. The City shall continue to cooperate with the St. Johns River Water Management District to monitor groundwater supply conditions and review of consumptive use quantities.	Yes
<p>Policy 1.3.4. The City shall continue to educate residents on the benefits of water conservation and shall expand water conservation efforts, in accordance with the City's Water Conservation Plan. The City will continue to promote the following programs:</p> <ul style="list-style-type: none"> ▪ Landscape and irrigation seminars ▪ Water audit program ▪ Irrigation timer assistance ▪ High water user program ▪ Website information ▪ Public Service Announcements ▪ Landscape demonstration ▪ Employee Training ▪ Lake County Water Alliance Initiative ▪ Requiring the use of EPA Water Sense plumbing fixtures and where applicable, appliances, in new developments ▪ Require Homeowners Associations Boards in new developments to include a water conservation coordinator. 	Yes

<ul style="list-style-type: none"> ▪ Coordination with the SJRWMD’s Watershed Action Volunteer (WAV) program to provide water conservation speakers to local schools and community organizations and promote community volunteer activities. ▪ Display and distribute water conservation information at community functions. ▪ Participation in education programs with the Lake County Water Authority and University of Florida/IFAS Florida Yards & Neighborhoods community clubs, etc. to promote the importance of water conservation ▪ Participate in educational programs with University of Florida/IFAS Florida Yards & Neighborhoods ▪ Informative Billing ▪ Billing Inserts to promote water conservation 	
<p>Policy 1.3.5. The City shall require installation of dual line distribution systems in new developments and encourage individual connection to its reclaimed water system for irrigation purposes.</p>	<p>Yes</p>
<p>Policy 1.3.6. The City shall evaluate the need for a restricted irrigation hours ordinance that is that is in compliance with State and local regulations. The City shall also require working automatic rain sensor shut-offs on all automatic irrigation systems.</p>	<p>Yes</p>
<p>Policy 1.3.7. The City will continue to expand its reclaimed water system to increase availability of reuse water and to decrease potable water demand, in support of the City’s 10-Year Water Facilities Work Plan.</p>	<p>Yes</p>

AVIATION ELEMENT

Objective 1.1. Land Use Compatibility. Objective 1.1 addresses the coordination of improvements, or the expansion of existing aviation facilities, with the Future Land Use and Conservation Elements, while striving to prevent obstructions to airport operations.

The policies under Objective 1.1 were reviewed in order to determine their continued relevance and applicability. Table A1 below summarizes the results of this review.

TABLE A1. AVIATION ELEMENT OBJECTIVE 1.1 POLICY REVIEW

Policy	Relevant
Objective 1.1. Land Use Compatibility. The City of Leesburg shall coordinate improvements or expansions of aviation facilities with the Future Land Use Element and the Conservation Element while striving to prevent obstructions to airport operations.	Yes
Policy 1.1.1. The City shall support redevelopment of existing, and the siting of new, aviation and aviation-related facilities that provide for the economic development of the community and are compatible with adjacent land uses.	Yes
Policy 1.1.2. The City of Leesburg shall protect and conserve natural resources from improvements or expansions of aviation facilities, except in accordance with state and local permitting and any approved mitigation plan, consistent with the Conservation Element.	Yes
Policy 1.1.3. Expansion of existing airport facilities or construction of new airport facilities in the unincorporated County shall be directed away from existing residential areas or areas planned for residential use, except as may be permitted by the Lake County Board of County Commissioners in accordance with the Land Development Regulations.	Yes
Policy 1.1.4. The City shall establish land development regulations which prevent the creation, establishment, or maintenance of hazards to aircraft and prevent the destruction or impairment of the utility of the airports in the City or the public investment therein.	These have been established.
Policy 1.1.5. The City shall continue to review airport development plans to assure that development at the City's airport does not exceed Federal Aviation Administration (FAA) land use guidance decibel levels on existing developed land unless provisions are made to ameliorate the impacts.	Yes

Objective 1.2. Facilities Development. Objective 1.2 calls for the City to continue to support the maintenance and expansion of airport facilities in order to uphold Leesburg Airport as an economic asset to the City.

The policies under Objective 1.2 were reviewed in order to determine their continued relevance and applicability. Table A2 below summarizes the results of this review. Leesburg Regional Airport is now Leesburg International Airport and all references to such need to be updated.

TABLE A2. AVIATION ELEMENT OBJECTIVE 1.2 POLICY REVIEW

Policy	Relevant
Objective 1.2. Facilities Development. The City of Leesburg shall continue to support maintenance and expansion of airport facilities in order to uphold Leesburg Regional as an economic asset to the City.	Update objective to reflect airport’s status as an international airport.
Policy 1.2.1. The City shall coordinate its comprehensive planning process, including subsequent amendments to the Comprehensive Plan, with the adopted airport master plan and future updates for Leesburg Regional Airport in order to achieve environmentally and economically sound development of aviation facilities, and to provide adequate capacity for existing and future demand for aviation facilities and services consistent with the master plan.	Update policy to reflect airport’s status as an international airport.
Policy 1.2.2. The City shall support Leesburg Regional Airport’s vision to include charter and domestic flights in addition to general aviation.	Update policy to reflect airport’s status as an international airport.

Objective 1.3. Traffic Coordination. Objective 1.3 addresses the need to coordinate improvements or expansions of aviation facilities with the Traffic Circulation Element. Pursuant to the 1985 Growth Management Act, the City is required to replace the Traffic Circulation Element with a Transportation Element, the purpose of which is to provide policy guidelines which promote multimodal transportation solutions to mobility problems. All references to Traffic Circulation should be updated accordingly.

The policies under Objective 1.3 were reviewed in order to determine their continued relevance and applicability. Table A3 below summarizes the results of this review.

TABLE A3. AVIATION ELEMENT OBJECTIVE 1.3 POLICY REVIEW

Policy	Relevant
Objective 1.3. Traffic Coordination. The City shall coordinate improvements or expansions of aviation facilities with the Traffic Circulation Element.	Update to refer to “Transportation Element”
Policy 1.3.1. The City of Leesburg shall ensure that surface transportation access to aviation facilities is coordinated with the traffic circulation system shown on the traffic circulation maps.	Update to refer to “Transportation Element”
Policy 1.3.2. In the event of future expansion, the City of Leesburg shall coordinate its traffic planning efforts with Lake County and the Florida Department of Transportation, in order to address the impacts of planned airport expansions on transportation needs.	Update to include Lake Sumter MPO.

Objective 1.4. Capital Improvements. Objective 1.4 addresses the need for the City to coordinate their Capital Improvement Plan with the Federal Aviation Administration, the Florida Department of Transportation, and Lake County. The City's CIP should also be coordinated with Lake Sumter MPO.

The policies under Objective 1.4 were reviewed in order to determine their continued relevance and applicability. Table A4 below summarizes the results of this review.

TABLE A4. AVIATION ELEMENT OBJECTIVE 1.4 POLICY REVIEW

Policy	Relevant
Objective 1.4. Capital Improvements. The City of Leesburg shall coordinate the Capital Improvement Plan associated with aviation facilities of the Federal Aviation Administration, the Florida Department of Transportation, and Lake County	Update to include Lake Sumter MPO.
Policy 1.4.1. The City of Leesburg shall ensure that fiscal impacts for improvements or expansions of aviation facilities, as well as transportation plans impacted by such improvements or expansions, are reflected in the applicable budgets of the Federal Aviation Administration, the Florida Department of Transportation Five-Year Transportation Plan, Lake County, and the City of Leesburg's Capital Improvement Element.	Update to include Lake Sumter MPO.
Policy 1.4.2. The City of Leesburg shall encourage and support appropriate funding applications submitted by the Florida Department of Transportation.	Update to include Lake Sumter MPO.
Policy 1.4.3. Improvements or the expansion of airport facilities shall be coordinated with the necessary expansion or improvements to the traffic system to support the facilities.	Update "traffic" to "transportation".
Policy 1.4.4. The costs and funding sources for right-of-way acquisition and road improvement projects needed to meet the impact of airport facilities on the traffic circulation plan shall be reviewed and taken into account in the annual update of the City of Leesburg's Capital Improvements Program.	Update "traffic circulation" to "transportation".

CAPITAL IMPROVEMENTS ELEMENT

Objective 1.1. Capital improvements Schedule. Objective 8-1.1 addresses the need for the development of a capital improvement schedule to ensure the provision of services and infrastructure to meet the needs of existing and future development. The policies under Objective 1.1 were reviewed in order to determine their continued relevance and applicability. Table CIE1 below summarizes the results of this review.

TABLE CIE1. CAPITAL IMPROVEMENTS ELEMENT OBJECTIVE 1.1 POLICY REVIEW

Policy	Relevant
Objective 1.1. Capital Improvement Schedule. To ensure that the necessary facilities and infrastructure will be in place and water supply is sufficient to meet Levels of Service established within the Growth Management Plan, the City shall formally adopt the Capital Improvement Schedule, identified herein as Table XII-2.	Yes
Policy 1.1.1. Capital projects shall be defined as those projects identified within the other elements of the Growth Management Plan that are necessary to meet established levels of service, increase the capacity or efficiency of existing infrastructure, replace failing infrastructure or enhance facilities and infrastructure that generally have a cost exceeding \$10,000.	Yes
<p>Policy 1.1.2. Capital projects for the following facilities and infrastructure shall be included and funded as part of the City's Capital Improvement Schedule:</p> <ul style="list-style-type: none"> ▪ Transportation ▪ Stormwater Management (Drainage) ▪ Sanitary Sewer ▪ Solid Waste ▪ Potable and Reclaimed Water ▪ Parks and Recreation 	Yes
<p>Policy 1.1.3. Capital projects shall be prioritized according to the following criteria:</p> <ul style="list-style-type: none"> ▪ Whether the project is necessary to meet established levels of service. ▪ Whether the project increases the efficiency of existing facilities or infrastructure. ▪ Whether the project represents a logical extension of facilities within the urban service area. ▪ Whether the project is coordinated with major projects of other agencies_including the St. Johns River Water Management District. ▪ Whether the project implements the policies of the Growth Management Plan as they pertain to concurrency requirements. ▪ Whether the project eliminates a public hazard. ▪ Whether the project is financially feasible. ▪ Whether the project is coordinated with the City's 10-Year Water Supply Facilities Work Plan. 	Yes
Policy 1.1.4 The City shall issue no development orders or development permits without first consulting the City of Leesburg's Utility Department to determine whether adequate water supplies to serve the development will be available no later than the anticipated date of issuance by the City of a certificate of occupancy or equivalent. The City will also ensure that adequate water supplies and facilities are available and in place prior to issuing a certificate of occupancy or its functional equivalent.	Yes

Objective 1.2. Level of Service. Objective 1.2 addresses the Level of Service criteria for facilities and infrastructure.

The policies under Objective 1.2 were reviewed in order to determine their continued relevance and applicability. Table CIE2 below summarizes the results of this review.

TABLE CIE2. CAPITAL IMPROVEMENTS ELEMENT OBJECTIVE 1.2 POLICY REVIEW

Policy	Relevant
Objective 1.2. Level of Service (LOS). The City shall utilize level of service criteria defined in the various Elements of this Plan when determining the timing and funding of capital facilities.	Yes
<p>Policy 1.2.1. Adopted level of service standards for facilities and infrastructure shall be as follows:</p> <ul style="list-style-type: none"> a. The following minimum LOS standards for Transportation facilities are as follows: <ul style="list-style-type: none"> ▪ Limited Access Roads LOS C, or as otherwise prescribed by FDOT ▪ Arterials LOS D ▪ Collectors LOS D b. The level of service for Sewer is 251 gallons per day per capita. c. The level of service for solid waste collection shall be as follows: <ul style="list-style-type: none"> ▪ Residential LOS: Once weekly collection of all residential garbage, yard grass and recyclables. Once a month bulk pickup or as requested. ▪ Commercial LOS: One to six times per week dumpster service, three times per week hand collection, once per week cardboard recycling, and bulk pickup on request. d. The City's Level of Service for potable water supply shall be 150 gallons per person per day. e. The level of service for total parks is as follows: <ul style="list-style-type: none"> ▪ Overall Park Land: Six (6) acres per 1,000 residents. This standard includes both passive and active developed open space. ▪ Community Parks: Three (3) acres per 1,000 residents ▪ Neighborhood Parks: Two (2) acres per 1,000 residents. ▪ Mini Parks: Level of service for mini parks is based on a service area, rather than population, as detailed in the Recreation and Open Space Element. f. The City herein adopts minimum level of service (LOS) standards for reclaimed transmission systems and treatment which conform to all applicable state and county environmental health standards and regulations, including those required by Rule 62-610, F.A.C. 	Yes
<p>Policy 1.2.2. In coordination with other City departments, the Community Development Department shall evaluate land use amendments to determine the compatibility of those amendments with the adopted level of service standards and to ensure adequate funding is available when improvements are necessary pursuant to such land use amendments.</p> <p>On or before September 15th of each year and after consideration of the written comments of the County and the Cities, the Lake County School Board will adopt a financially-feasible Work Program that includes school capacity sufficient to meet anticipated student demand within the County, based on the LOS standards set forth in the Interlocal Agreement. The School Board will construct and/or renovate school facilities sufficient to maintain the LOS standards set forth in the Interlocal Agreement, consistent with the adopted 5-Year Facilities Work Program. Nothing in this agreement shall be construed to abrogate the School Board's constitutional authority in determining delivery of student services, including but not limited to school scheduling or to require the School Board to redistrict any school more than once in any three consecutive year period. The City of Leesburg shall adopt the School Board's adopted work program into their CIE updates each December.</p>	Yes

<p>Policy 1.2.3. Capital projects shall use the following thresholds to target initiation and budgeting of construction and/or purchase of capital facilities to meet projected future needs based on adopted level of service (LOS) standards:</p> <ul style="list-style-type: none"> ▪ Roadways - Volumes are at 90 % of adopted LOS capacity. ▪ Sewer – 75 % of available capacity is being utilized. ▪ Water – 75 % of available capacity is being utilized. ▪ Recreation and Open Space – Park lands when 95 % of available land area is utilized or when 90 % of the population exists in areas in need of new park acreage. ▪ The level of service for all schools shall be set at 100% of FISH permanent capacity. In instances where the CORE (dining) capacity is greater than the FISH permanent capacity, the school capacity shall then be increased to that of the CORE (dining) capacity and the level of service maintained at 100% of the school capacity. In no instance shall the school capacity increase more than 125% due to additional CORE (dining) capacity. Coordination with the Lake County School Board’s Five Year District Facilities Work Plan, the plans of other local governments, and as necessary, updates to the Concurrency Service Area map is required to ensure that the adopted Level of Service Standards for Concurrency Service Areas will be achieved and maintained. 	<p>Yes</p>
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Objective 1.3. Funding Sources. Objective 1.3 addresses the need for adequate funding sources for capital projects.

The policies under Objective 1.3 were reviewed in order to determine their continued relevance and applicability. Table CIE3 below summarizes the results of this review.

TABLE CIE3. CAPITAL IMPROVEMENTS ELEMENT OBJECTIVE 1.3 POLICY REVIEW

Policy	Relevant
Objective 1.3. Funding Sources. The City shall pursue adequate funding for the construction of capital projects identified in the Capital Improvement Schedule.	Yes
<p>Policy 1.3.1. The following procedures shall be utilized to ensure adequate funding for transportation capital projects:</p> <ul style="list-style-type: none"> ▪ 100% of State revenue sharing motor fuels tax funds shall be reserved specifically for traffic related maintenance and capital improvement projects. ▪ 100% of net proceeds, after payment of existing bond obligations, of the Lake County Local Option Gasoline Tax shall be reserved specifically for traffic related maintenance and capital improvement projects. ▪ 100% of the total proceeds from the Lake County Local Option Sales Tax shall be reserved for traffic related capital projects. 	Yes
<p>Policy 1.3.2. The following procedures shall be utilized to pursue adequate funding for stormwater management (drainage) capital projects:</p> <ul style="list-style-type: none"> ▪ 100% of the total proceeds from the Stormwater Utility Fund shall be reserved for stormwater management operating needs and capital projects. ▪ Cash restricted due to bond and grant covenants will be budgeted in accordance with the terms of the covenants. 	Yes
<p>Policy 1.3.3. The following procedures shall be utilized to pursue adequate funding for sanitary sewer capital projects:</p> <ul style="list-style-type: none"> ▪ 100% of the total proceeds from the Sanitary Sewer Utility Fund shall be reserved for sanitary sewer management operating needs and capital projects. ▪ Cash restricted due to bond and grant covenants will be budgeted in accordance with the terms of the covenants. 	Yes
<p>Policy 1.3.4. The following procedures shall be utilized to pursue adequate funding for potable water and reclaimed water capital projects:</p> <ul style="list-style-type: none"> ▪ A portion of funds collected from the Utility Enterprise Fund shall be reserved to complete potable water capital projects. ▪ Cash restricted due to bond and grant covenants will be budgeted in accordance with the terms of the covenants. 	Yes
<p>Policy 1.3.5. The following procedures shall be utilized to pursue adequate funding for parks and recreation capital projects:</p> <ul style="list-style-type: none"> ▪ Grants shall be pursued and used for the completion of parks and recreation capital projects. ▪ The Land Development Regulations shall contain provisions for all new developments to provide parks and recreation lands and/or facilities and/or fees-in-lieu-of as specified in the Recreation and Open Space Element. 	Yes

Objective 1.4. Capital Improvement Evaluation. Objective 1.4 addresses the need for capital projects to be evaluated consistent with adopted LOS standards, 10 year water supply plan and/or public need.

The policies under Objective 1.4 were reviewed in order to determine their continued relevance and applicability. Table CIE4 below summarizes the results of this review.

TABLE CIE4. CAPITAL IMPROVEMENTS ELEMENT OBJECTIVE 1.4 POLICY REVIEW

Policy	Relevant
Objective 1.4. Capital Improvement Evaluation. All City capital projects shall be evaluated to determine if they meet the prioritization criteria and consistency with adopted level of service standards, city-adopted 10-Year Water Supply Facilities Work Plans, and/or public need.	Yes
<p>Policy 1.4.1. Requests for capital projects shall be evaluated for their consistency with adopted level of service standards by utilizing the following criteria:</p> <ul style="list-style-type: none"> ▪ All major capital project requests shall be submitted for comprehensive plan review by the Local Planning Agency by March 31st of each year in order to be included in the following fiscal year capital budget. ▪ The Community Development Department shall prepare an annual report evaluating the timing, location, and service area for each proposed capital project and whether the project is consistent with the Leesburg Growth Management Plan. 	Yes
Policy 1.4.2. The City shall continue to maintain an inventory of any existing hazards within the City by using the hazards analysis and hazards mitigation criteria established by the Lake County Emergency Management Department and shall also identify any grant sources available to mitigate the hazards listed on the hazard inventory.	Yes
<p>Policy 1.4.3. Requests for capital projects shall be evaluated for their impact on the City budget and the financial feasibility of the project based on the following criteria:</p> <ul style="list-style-type: none"> ▪ The Finance Department shall determine if the capital project can be funded from existing cash, future revenues, or through borrowing. In addition, the Finance Department shall assign a revenue source(s) to fund the project. ▪ The Finance Department shall prepare a report evaluating the funding options, effect of the improvement on future revenues, and the effect of the improvement on operation and maintenance costs. 	Yes
Policy 1.4.4. All capital projects shall be reviewed as to their compatibility and timing in relation to capital projects being implemented or planned by Lake County, the Florida Department of Transportation, the St. Johns River Water Management District, the Lake County School Board, the Florida Department of Environmental Protection, and/or any other government agency. The City should use reasonable methods to track capital projects of any agency, which may be in conflict or may enhance the City's capital projects.	Yes
Policy 1.4.5. The city will identify all additional potable water supply sources, infrastructure and facilities (and associated projects/costs) needed to meet water supply demands for a 10-year planning period in the city-prepared 10-Year Water Supply Facilities Work Plan.	Yes
Policy 1.4.6. The additional potable water supply sources, infrastructure and facilities and associated projects identified in the 10-Year Water Supply Facilities Work Plan will be developed in coordination with local governments and prepared in accordance with the St. Johns River Water Management	Yes

District regional water supply plans.	
Policy 1.4.7. The city will ensure that all facilities identified as being needed in the first five years of 10-year Water Supply Facilities Work Plan planning period be adopted as a revision to the city's 5-Year Capital Improvements Plan.	Yes
Policy 1.4.8. The city will ensure that the selection of water supply projects in the 10-Year Water Supply Facilities Work Plan are evaluated based on: imparting a minimal impact to spring and wetland flows/levels; feasibility of cost and operability; and the availability of the water supply resource considering allocations provided to other neighboring utilities and/or governments.	Yes
Policy 1.4.9. On an ongoing basis, review pre-existing plans and performance data identified in the 10-Year Water Supply Facilities Work Plan and actual conditions identified in the field relating to the existing water system to identify deficiencies, priorities, and improvement costs.	Yes
Policy 1.4.10. Each year, continue implementation of the annual renewal and replacement program for system improvements to address water utility system pressure problems and other deficiencies identified in the field or as planned in the City's 10-Year Water Supply Facilities Work Plan.	Yes

Objective 1.5. Debt Management. Objective 1.5 addresses the need for debt management for funding of capital projects.

The policies under Objective 1.5 were reviewed in order to determine their continued relevance and applicability. Table CIE5 below summarizes the results of this review.

TABLE CIE5. CAPITAL IMPROVEMENTS ELEMENT OBJECTIVE 1.5 POLICY REVIEW

Policy	Relevant
Objective 1.5. Debt Management. The City shall adopt policies and procedures which address the management and utilization of debt for the purposes of capital project financing, and the City will use line of credit borrowing or bond anticipation notes for specific construction projects and issue revenue pledged debt at construction completion only if current funds do not provide adequate funding to pay for construction.	Yes
<p>Policy 1.5.1. The use of revenue bonds as a debt instrument shall be evaluated based on the following criteria:</p> <ul style="list-style-type: none"> ▪ A five (5) year projection of revenues from all funds shall be prepared and updated annually as a part of the City's budget process, and an analysis of historic and future trends in the revenue stream will be a part of the projection process. ▪ Revenue bonds shall be allowed to fund up to one hundred percent (100%) of the City's total debt. Debt will not be issued to finance normal repairs and maintenance. Debt can be issued to make renovations, updates, modernizations and rehabilitations provided the expenditures extend the useful life of the capital asset. ▪ The maximum ratio of total debt service (principal and interest) to total revenue shall be that percentage deemed most beneficial to the City as determined by the City's Financial Advisors and its Bond Counsel base upon criteria set by the rating agencies and credit enhancement organizations. ▪ The impact of principal and interest revenue bond payments on the operation and maintenance of the affected utility and/or department will not require deferring current maintenance of existing infrastructure. ▪ The impact of bond covenants and restrictions on the City's method of accounting for depreciation, and the impact of any reserve account restrictions on the operation and maintenance of the affected utility and/or department. ▪ Cash restricted due to bond and grant covenants will be budgeted in accordance with the terms of the covenants. ▪ On an annual basis, the City will restrict the amount of cash equivalent to twenty-five percent (25%) of depreciation as reported on the prior year's annual financial statement in enterprise operations to ensure adequate repair and/or replacement of capital facilities. ▪ Capitalized repairs of existing infrastructure will be paid from funds restricted by debt covenants and current revenues. Debt will not be issued to finance capitalized repairs. 	Yes
<p>Policy 1.5.2. The use of tax revenues as a pledge for the repayment of debt shall be evaluated based on the following criteria:</p> <ul style="list-style-type: none"> ▪ A five (5) year projection of revenues from all taxes shall be prepared and updated annually as a part of the City's budget process, and an analysis of historic and future trends in the tax revenue stream will be a part of the projection process. ▪ At the time of issuance of new debt, a review shall be conducted to ensure that the maximum amount of general government debt shall not exceed fifteen percent (15%) of the City's property tax base assessed valuation reported yearly by the Lake County Property Appraiser's office. 	Yes
Policy 1.5.3. The City may use long term capital lease payments on lease purchases for capital projects identified within this Element, provided adequate debt service requirements are provided.	Yes

Objective 1.6. Repair and Replacement. Objective 1.6 calls for all City departments to prioritize capital projects that need repair and/or replacement.

The policies under Objective 1.6 were reviewed in order to determine their continued relevance and applicability. Table CIE6 below summarizes the results of this review.

TABLE CIE6. CAPITAL IMPROVEMENTS ELEMENT OBJECTIVE 1.6 POLICY REVIEW

Policy	Relevant
Objective 1.6. Repair and Replacement. All City departments shall prioritize capital projects to provide for the repair and/or replacement of identified facilities.	Yes
Policy 1.6.1. As part of the annual budget process, all City departments shall identify and prioritize capital facilities in need of refurbishment or replacement and submit those facilities for funding.	Yes
Policy 1.6.2. As part of the annual budget process, the Environmental Services Department shall include and prioritize capital water supply facilities that are listed in the 10-Year Water Facilities Work Plan as in need of refurbishment or replacement and submit those projects for funding support.	Yes

Objective 1.7. New Development. Objective 1.7 calls for ensuring that development pays its proportionate fair share of the cost of providing new or expanded facilities.

The policies under Objective 1.7 were reviewed in order to determine their continued relevance and applicability. Table CIE7 below summarizes the results of this review.

TABLE CIE7. CAPITAL IMPROVEMENTS ELEMENT OBJECTIVE 1.7 POLICY REVIEW

Policy	Relevant
Objective 1.7. New Development. The City shall ensure that new developments share a proportionate share of the costs required to maintain adopted level of service standards, through the assessment of impact fees or developer contributions, dedications, or construction of capital facilities necessary to serve new development as required in other Elements of this Plan.	Yes
Policy 1.7.1. All development order applications shall be evaluated as to the impact of the development on capital facilities and the operation and maintenance of those facilities. The evaluation shall include, but not be limited to, the following: <ul style="list-style-type: none"> ▪ Expected capital costs, including the installation of new facilities required that are related to the development. ▪ Expected operation and maintenance costs associated with the new facilities required by the development. ▪ Anticipated revenues the development will contribute, including impact fees, user fees, and future taxes. 	Yes
Policy 1.7.2. When applicable, the City shall utilize developer's agreements to ensure the timely and appropriate installation of needed capital facilities to service new development. Such agreements will be executed under the City's constitutional home rule power and following the procedures set forth in Chapter 163.3220, Florida Statutes.	Yes
Policy 1.7.3. To ensure adequate supply and capacity allocations for all developments, the City may require any development to use developer's agreements and/or develop in more than one phase.	Yes
Policy 1.7.4. City shall continue to use impact fees for transportation and police and fire to ensure new developments contribute their proportionate share of capital project funding necessary to service new development.	Yes
Policy 1.7.5. New developments shall be responsible for installing all internal water and sewer systems, traffic circulation systems, and internal recreation/open space facilities within their development. In addition, connections of internal systems to the City's designated major water, reclaimed water, and sewer trunk systems and traffic circulation network shall be the financial responsibility of the developer.	Yes

Objective 1.8. Concurrency Management. Objective 1.8 addresses the need for the City to assess all development for their impact upon the City’s municipal services.

The policies under Objective 1.8 were reviewed in order to determine their continued relevance and applicability. Table CIE8 below summarizes the results of this review.

TABLE CIE8. CAPITAL IMPROVEMENTS ELEMENT OBJECTIVE 1.8 POLICY REVIEW

Policy	Relevant
<p>Objective 1.8. Concurrency Management. The City shall continue to operate a Concurrency Management System for the review of all proposed developments within Leesburg for their impact upon Leesburg’s municipal services. The concurrency evaluation system shall measure the potential impact of any proposal for a development permit or order upon the established minimum acceptable levels of service for sanitary sewer, solid waste, drainage, potable water, parks and recreation, and transportation facilities, unless the development permit or order is exempt from the review requirements of this section. No development permit or order which contains a specific plan of development, including densities and intensities of development, shall be issued unless adequate public facilities are available to serve the proposed development as determined by the concurrency evaluation set forth in this section.</p>	Yes
<p>Policy 1.8.1. Evaluation. All final development orders or development permits are required to be assessed for concurrency. Prior to the issuance of a final development order or development permit, the developer/applicant must obtain a Concurrency Certificate. Any applicant for a development permit must provide all information deemed necessary by the City to adequately assess the impacts of the proposed development.</p>	Yes
<p>Policy 1.8.2. Traffic Study. The City shall amend the City Code to require a traffic study that demonstrates the impacts to the City’s roadway network for any new commercial or industrial development of 10,000 or more square feet of gross floor area, all residential development of 100 units or more or other similar high traffic area as deemed necessary by staff. .</p>	Yes
<p>Policy 1.8.3. Final Development Orders. For purposes of this Section, final development orders and development permits are considered to be: Any building permit, zoning permit, subdivision approval, rezoning certification, special exception, variance, or any other official action of the City having the effect of permitting the development of land. Any order granting, denying or granting with conditions an application for a development permit. The Community Development Department shall make concurrency inventory information available to the public through the generation of reports containing the following information:</p> <ul style="list-style-type: none"> ▪ The current capacity of each measured public facility ▪ The available capacity of deficiencies of each measured public facility ▪ Improvements to any public facilities that will be made by the City or by a developer pursuant to a development order and the impact of such improvements on existing public facility capacities or deficiencies. 	Yes
<p>Policy 1.8.4. Application Procedure. The Development Review Committee shall make determinations regarding concurrency applications and issue certificates according the procedures established in this section. An application for a Concurrency Certificate shall be filed with all applications for a final development order or permit, unless otherwise exempted. A preliminary review application may also be submitted for an informal and non-binding concurrency review by the Development Review Committee. All applications shall be made on a form prescribed by the City, which should require, at a minimum and as applicable:</p> <ul style="list-style-type: none"> ▪ Date of submittal. ▪ Name, address, and telephone number of applicant and property owner. 	Yes

<ul style="list-style-type: none"> ▪ Parcel I.D. number, street address, and legal description. ▪ Proposed land use(s) by land category, square feet and number of units. ▪ Phasing information by proposed uses, square feet and number of units. ▪ Existing use of property, acreage of property, name of DRI, PUD or Subdivisions. ▪ Site design information. ▪ Previously issued concurrency certificates. ▪ Possible limitations in the manner in which the proposed use will be conducted, including restrictions on use, resident population, density and intensity of use. ▪ Possible limitations on the height, size, location, density or intensity of a building or other structure. ▪ Possible phasing schedule. ▪ Possible alternative with respect to size, number, location or nature of vehicle access points. ▪ Possible increase in the amount of street dedication, roadway width, or construction of roadway improvements within street right-of-way. ▪ Plans for the protection of existing trees, vegetation, water resources, wildlife habitat and other significant natural resources. ▪ Any information regarding possible solutions or alternatives which would permit the proposed development in conformity with the requirements and intent of this section and the City's Growth Management Policies. ▪ Data and analysis relevant to the concurrency facilities and services evaluated under this section, were upon the Development Review Committee can conduct and make an informed concurrency determination. <p>An application, which is not technically complete, shall be returned to the applicant with a correspondence detailing the deficiencies in the application. Failure to submit the required information in accordance with this section shall result in the denial of the concurrency application. Applications deemed complete by the City shall be handled on a first-come-first-served basis. Once an application is complete, any change in uses, densities or intensities for the subject property that result in an increased capacity requirement for any concurrency facility shall be subject to a new concurrency review. An application fee may be established by the City Commission by resolution</p>	
<p>Policy 1.8.5. Concurrency Exemptions and Change of Use. Certain developments cause no added impacts on facilities, and therefore can be considered exempt from concurrency and the requirement to undergo a concurrency evaluation. Any change, redevelopment or modification of use shall require a concurrency evaluation, provided the proposed change, redevelopment or modification of use has more than a de minimis impact on public facilities and services than the previous use that was actively maintained on the site during the six (6) month period prior to the date of application for concurrency evaluation. Concurrency credit shall be given for the previous use that was actively maintained on the site during the six (6) month period prior to the date of application for concurrency evaluation. If the proposed change, redevelopment or modification of use has a lesser impact on public facilities and services than the previous use during the six (6) month period prior to the date of application for concurrency evaluation, then no concurrency evaluation shall be required.</p> <p>If no use existed on the site for the six (6) month period prior to the date of application, no concurrency credit shall be issued and the proposed use shall be subject to concurrency evaluation.</p>	Yes
<p>Policy 1.8.6. Demolitions. In case of a demolition of an existing use or structure, the concurrency evaluation for the redevelopment shall be based upon the net increase of the impact for the new or proposed land use as compared to the most recent land use existing prior to demolition, provided that such credit is utilized within six (6) months of the date of issuance of the demolition permit. Such credits are non-transferable.</p>	Yes
<p>Policy 1.8.7. Concurrency Certificate. A Concurrency Certificate is a "snap shot" of available capacity for each public facility, evaluated under this section, at the time the certificate is issued. The Concurrency Certificate does not guarantee capacity in the future or encumber or vest capacity for any</p>	Yes

<p>period of time. At a minimum, the concurrency Certificate shall contain:</p> <ul style="list-style-type: none"> ▪ Name, address, and telephone number of the applicant or property owner. ▪ Parcel I.D. number and legal description. ▪ Date of issuance. ▪ Proposed use(s) by land use category, square feet and number of units. ▪ Phasing information by proposed uses, square feet, and number of units, if applicable. ▪ Total current available capacity within the service area(s). ▪ Project impact based on LOS standards. <p>A Concurrency Certificate shall expire one (1) year after issuance unless the applicant commences construction of the development under a validly issued building permit. A one (1) year extension may be granted by the Development Review Committee provided circumstances have not adversely diminished the capacity of public facilities and services to support the development, in which case, the development shall be subject to a new concurrency evaluation.</p>	
<p>Policy 1.8.8. Procedures for Concurrency Evaluation. No application shall be deemed sufficient unless it contains all information, which in the professional judgment of the Development Review Committee, is reasonably necessary to evaluate the impacts of the proposed development on public facilities and services subject to review. During the review process, the Development Review Committee shall either deny, approve, or approve with conditions, the application for a concurrency certificate.</p>	Yes
<p>Policy 1.8.9. Concurrency Determination. All concurrency determinations for specific public facilities and services shall follow the procedures outlined below.</p> <p>Traffic: The Code of Ordinances will provide specific criteria to determine when and how individual traffic studies are required to determine concurrency and maintain the adopted LOS.</p> <p>Sanitary Sewer: The Code of Ordinances shall contain standards that determine concurrency for residential and non-residential uses based on the adopted LOS.</p> <p>Solid Waste: The Code of Ordinances shall contain standards that determine concurrency for residential and non-residential uses based on the adopted LOS. All solid waste facilities which are under the jurisdiction of another local government or government agency may be required to be assessed through the concurrency management system adopted by that government or agency. However, the City shall conduct a concurrency test for solid waste regardless of who has administrative or legal responsibility for solid waste facilities.</p> <p>Potable <u>and Reclaimed</u> Water: The Code of Ordinances shall contain standards that determine concurrency for residential and non-residential uses based on the adopted LOS, and applicable state and county environmental health standards and regulations, including those required by Rule 62-610, F.A.C.</p> <p>Parks and Recreation: A parks and recreation concurrency evaluation shall be required for any residential development on a citywide and per development basis. Citywide minimum levels of service for parklands shall be determined on a two level basis for community parks and neighborhood parks. In addition to the citywide minimum levels of service, new residential development shall supplement the system of neighborhood parks and recreation services by providing parkland (or fees in lieu of) consistent with the levels of service criteria and requirements established for parks and recreation under the City's Growth Management Plan.</p> <p>The parks and recreation level of service standards for community parks shall be monitored by the City through concurrency evaluations to ensure that the minimum levels of service standard for citywide community parks remains at or above 5 acres per 1,000 population. In performing the concurrency evaluation for community parks for a proposed residential development, the Development Review Committee shall determine the number of acres of community parkland, which would be necessary to</p>	Yes

<p>serve the number of proposed new dwelling units. If the development satisfies the level of service standards for community parkland, then the development shall be deemed concurrent for community parks and a certificate shall be issued consistent with the adopted procedures. If a residential development causes or continues to cause the level of service for community parks to be not concurrent, the developer shall pay the City a fair share community parks and recreation fee, as established by the City Commission by resolution. All such fees collected shall be allocated and appropriated to the City's recreation budget to be expended to enhance the City's community parks system with priority given to expend such funds to acquire parkland.</p> <p>In performing the concurrency evaluation for neighborhood parks and recreation for a proposed residential development, the Development Review Committee shall determine the number of acres of parkland, which would be necessary to serve the number of dwelling units on-site (minimum one-half acre). If such amount of parkland can be provided while meeting the level of service standards set forth in this section, then the development shall be deemed concurrent for parks and recreation. If such amount of parkland cannot be provided while meeting the level of service standard set forth in this section, then the development shall be deemed not concurrent for parks and recreation and a certificate shall not be issued. However, if a development cannot provide the required on-site parkland, the Development Review Committee shall permit the developer to satisfy the parks and recreation standard by providing a combination of on-site and off-site parkland and a fair share neighborhood parks and recreation impact fee as established by the City Commission by resolution. In such cases, the Development Review Committee shall require on-site parkland to the maximum extent feasible and practicable, off-site parkland shall be located in the same region as the proposed development, and said impact fee shall only be paid if on and off site parkland cannot be provided as required herein. At such time the development satisfies the level of service for parks and recreation, a certificate shall be issued in accordance with the adopted procedures, with the condition that the necessary parkland and recreational services, including any impact fees, shall be in place or paid when the impacts of the development occur or shall be guaranteed to be in place through an enforceable development order or agreement not more than one year after the issuance of a certificate of occupancy or its functional equivalent.</p>	
<p>Policy 1.8.10. Facilities Inventory and Reporting. The Community Development Department shall maintain an inventory of the available capacity within the roads, potable water, sanitary sewer, solid waste, and parks and recreation public facility categories. Each year, on or before June 1, the Community Development Department shall prepare a report for the City Commission containing the current capacity within each public facility category, including any encumbrances or deficiencies. This annual report shall also identify any public facilities that will require improvements to maintain adopted levels of service and recommend a schedule of improvements to avoid any reduction in the approval of development orders.</p>	<p>Yes</p>

CONSERVATION ELEMENT

Objective 1.1 Surface Water. Objective 1.1 addresses the protection of surface water in the City.

The policies under Objective 1.1 were reviewed in order to determine their continued relevance and applicability. Table CON1 below summarizes the results of this review.

TABLE CON1. CONSERVATION OBJECTIVE 1.1 POLICY REVIEW

Policy	Relevant
Objective 1.1. Surface Water. The City shall maintain regulations to protect surface water from known and identifiable pollution sources.	Yes
Policy 1.1.1. The City shall continue to support and assist the Lake County Pollution Control Department and other appropriate agencies in programs for monitoring the quality of lakes within and adjacent to the City.	Yes
Policy 1.1.2. Leesburg shall cooperate in the Florida Department of Environmental Protection’s STORET program for monitoring point source discharges into the rivers.	Yes
Policy 1.1.3. Leesburg shall maintain and implement a comprehensive stormwater management ordinance with the intent to supplement State and SJRWMD regulations establishing the following programs or activities. <ul style="list-style-type: none"> ▪ Establish stormwater quality and quantity levels of service. ▪ Establish permitting mechanisms and procedures for enforcement of adopted levels of service. ▪ Establish design and performance standards, such as rainfall distribution, amounts, and intensities, to be used as part of subsequent permitting and stormwater master planning. ▪ Establish definitions to assist in the understanding or enforcement of concepts of the stormwater management program. ▪ Identify activities requiring a stormwater management permit and those development activities exempt from the permit. ▪ Establish maintenance and inspection procedures including procedures for appeals and penalties. 	Yes
Policy 1.1.4. The City shall incorporate applicable stormwater management technical requirements of the SJRWMD into the City’s stormwater management ordinance.	Yes
Policy 1.1.5. The City shall coordinate with Lake County to assure that County land use controls applicable to adjacent unincorporated areas promote land uses which shall not adversely impact surface water quality within Leesburg through continued participation in: <ul style="list-style-type: none"> ▪ Joint City/County informal planning staff meeting ▪ The Lake County Technical Review Committee ▪ The East Central Florida Regional Planning Council’s Technical Advisory Committee 	Yes
Policy 1.1.6. To protect the shorelines from erosion, and to reduce sediments and suspended solids introduced to surface waters, the City shall coordinate with the U.S. Soil Conservation Service and relevant State Agencies in the identification of shoreline erosion problems and the analysis of best management practices to retard or prevent further erosion.	Yes
Policy 1.1.7. The City shall require that run-off from new developments does not directly enter natural surface waters. Provisions for on-site detention shall be included within the Code of Ordinances.	Yes
Policy 1.1.8. The city herein adopts the requirements of Rule 62-25, FAC and Section 402 of the Federal Clean Water Act Reauthorization for water quality standards for stormwater discharge for all new and existing stormwater management systems. As part of this adoption by reference, the city includes the	Yes

following clarifications and exceptions:

- The city does not mandate that existing facilities must be retrofitted to meet these standards. Such retrofitting will be accomplished through the funding constraints of the city's stormwater utility and other revenue sources.
- The city will retrofit those existing facilities that are determined (by the city) to be required to meet EPA/FDEP TMDL program point source discharge criteria.
- Stormwater management systems which satisfy the appropriate state or regional regulatory design and performance criteria are deemed to satisfy the stormwater discharge water quality standards.
- Stormwater management systems that comply with adequate locally or regionally established level of service standards shall also be deemed to satisfy the stormwater discharge water quality standards.
- The City may, at its discretion, allow exemptions to the stormwater management water quality standards to the extent permissible under federal, state or regional stormwater management water quality laws or regulations.
- This policy does not mandate that the city conduct water quality sampling or testing of stormwater discharge receiving waters to implement the standards of the policy.

Objective 1.2 Groundwater Resources. Objective 1.2 addresses the protection of ground water resources in the City.

The policies under Objective 1.2 were reviewed in order to determine their continued relevance and applicability. Table CON2 below summarizes the results of this review.

TABLE CON2. CONSERVATION OBJECTIVE 1.2 POLICY REVIEW

Policy	Relevant
Objective 1.2. Groundwater Resources. The City shall conserve, use best management techniques, and protect future and existing groundwater resources for potable water usage, as needed to support water supply planning efforts as stated in the city’s 10-year Water Supply Facilities Work Plan goals, objectives and project.	Yes
Policy 1.2.1. Leesburg shall cooperate with Lake County, FDEP, the Lake County Water Authority (LCWA) and SJRWMD, in their continuing program to monitor groundwater quality and levels.	Yes
Policy 1.2.2. Leesburg shall continue to monitor its former solid waste disposal site in order to protect groundwater quality.	Yes
Policy 1.2.3. The City shall maintain through its Code of Ordinances, provisions that establish zones of protection around each existing and future City potable water well and prohibit specified activities and land uses adjacent to potable water wellfields and their protection zones.	Yes
Policy 1.2.4. The adopted Code of Ordinances shall continue to require all development in the City to connect to City sewer service. Temporary treatment may occur in accordance with the 10D-6, F.A.C., where service is not available within 500 feet of the proposed site. However, upon provision of availability connection will be required	Yes
Policy 1.2.5. Site plan review criteria shall continue to include and enforce the minimization of impervious surface coverage in development design. Impervious surface ratios shall be 80% maximum coverage for commercial uses outside the CBD core, 100% for commercial uses within the CBD core, 80% for industrial uses, and 50% for residential uses.	Yes
Policy 1.2.6. The City shall continue to require applicants of proposed developments to provide evidence prior to the issuance of a Certificate of Occupancy that appropriate operating permits have been issued by State regulatory agencies, particularly for commercial or industrial activities using on-site storage facilities for chemical or hazardous materials and wastes.	Yes
Policy 1.2.7. Prior to development approval, an inspection shall be conducted to properly identify active drainage wells. If any wells are found, the developer shall report the presence of these wells to the city and FDEP and shall be responsible for sealing the drainage wells.	Yes
Policy 1.2.8. The City shall utilize fees from the adopted Stormwater Management Utility to investigate, operate, and maintain suitable means for treatment and management of stormwater runoff; and shall require best management practices as identified by SJRWMD to be implemented on all new development.	Yes
Policy 1.2.9. Areas designated as Conservation on the City’s Future Land Use Map may be incorporated as a part of the City’s wastewater treatment system and used for effluent treatment purposes, as approved by the FDEP.	Yes
Policy 1.2.10. The City’s Land Development Code shall require the installation of EPA Water Sense plumbing devices including low-flow toilets, showerheads, and faucets for new construction and within new developments.	Yes
Policy 1.2.11. The City shall continue to implement, and expand where feasible, water reuse or reclamation systems for commercial, residential, and industrial operations which utilize large quantities of non-potable water.	Yes

<p>Policy 1.2.12. The City shall adopt Florida Friendly Landscape ordinance prepared with consideration to the St. John’s River Water Management District’s “Standards for Landscape Irrigation in Florida” document, which is based on the District’s model landscape ordinance and shall promote, through educational programs and publications, the use of Florida friendly practices, which include low or no water landscaping, the use of solid waste compost, efficient irrigation systems, and the prohibition of exotic plant species, which will result in the conservation of water.</p>	<p>Yes</p>
<p>Policy 1.2.13. Septic systems are prohibited within 200 feet of a public water supply well, unless otherwise approved by the Florida Department of Environment Protection (FDEP) or the Florida Department of Health and Rehabilitative Services (HRS).</p>	<p>Yes</p>
<p>Policy 1.2.14. The city will continue to make appropriate changes to the city’s Comprehensive Plan’s Conservation Element that support the attainment of water quality needed to safeguard water supply and support water supply planning efforts as stated in the city’s 10-year Water Supply Facilities Work Plan goals, objectives and projects.</p>	<p>Yes</p>
<p>Policy 1.2.16. Continue to regulate development within high recharge areas and designated wellhead protection areas of public water supply wellheads as follows:</p> <ul style="list-style-type: none"> ▪ at a minimum, conform to Rule 62-521, FAC (Wellhead Protection) adopted by the Florida Department of Environmental Protection and city codes/standards pertaining to lands adjacent to streams, ponds, lakes, and wetlands, groundwater and wellhead protection, and Standard Stormwater Management Facility Construction Specifications regarding types of restrictions within designated wellhead protection areas; ▪ limit impervious surface areas, including roofs and pavement, in high recharge areas and designated wellhead protection areas, except that impervious cover factors may be increased for infill locations in already developed areas of the same or greater intensity; ▪ on-site waste disposal methods may be used only where permissible by state and local agencies having jurisdiction and where public sewer service is unavailable and is not included in the current five-year Capital Improvements Program; ▪ Designated wellhead protection areas are those set forth in the “Wellhead Protection Area Delineation” report prepared by the St. Johns River Water Management District and accepted by the City of Leesburg. 	<p>Yes</p>
<p>Policy 1.2.17. Continue to implement/enforce established codes pertaining to buffer size requirements, development setback requirements, setback requirements, native vegetation setback requirements, and stormwater swale requirements, pursuant to the city code for construction site operators/owners of development to maintain. Elements of buffer zone requirements include the establishment of upland buffer zones on the landward extent of the wetland jurisdictional line as defined by St. Johns River Water Management District (SJRWMD) criteria. The City will continue to enforce these requirements as part of the pre-construction review of buffer zone designs and as part of the construction inspection process already in place.</p>	<p>Yes</p>
<p>Policy 1.2.18. The city will continue to regulate (by ordinance) and control construction site waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste that may cause adverse impacts to water quality, pursuant to code of ordinances.</p>	<p>Yes</p>
<p>Policy 1.2.19. The City will continue to regulate stormwater discharges from pre- and post-development construction pursuant to established city codes to maintain, confine and regulate runoff from polluting surface water, reducing erosion and sedimentation, preventing flooding and endangering the ecological balance of the environment in an effort to enhances landscape value, increases groundwater recharge, enhance water quality, and decreases groundwater consumption.</p>	<p>Yes</p>
<p>Policy 1.2.20. The City will consider establishing a program that offers incentives to encourage infill development which describes the minimum requirements that all property owners/ developers must comply with when requesting development approval for property located within the city. Offered incentives for infill development in higher density urban areas should include density bonuses and the transfer of development rights to infill locations.</p>	<p>Yes</p>

Policy 1.2.21. Continue to apply and evaluate the effectiveness of newly adopted multi-tiered inclined water usage rate structure (conservation rate structure) for potable water uses, in support of water conservation objectives.	Yes
Policy 1.2.22. Continue to apply and evaluate the effectiveness of adopted reclaimed water usage rate structure for irrigation water uses, in support of water conservation objectives.	Yes
Policy 1.2.23. Review local water consumption trends no less frequently than biannually and, as needed, adjust the city's water use rate structure accordingly to fund water and reclaimed water projects in accordance with the city's 5-year CIP, the city's 10-year Water Supply Facilities Work Plan and as necessary to maintain per capita consumption at or below previous levels.	Yes
Policy 1.2.24. The City will continue to apply the Florida Building Code for city development construction pertaining to plumbing fixture(s) back-flow prevention device inspection and testing requirements, and low volume fixture installation, to maintain compliance with the Florida Building Code.	Yes
Policy 1.2.25. Continue to perform annual leak detection of the city water distribution system water mains and make necessary repairs to water mains in support of the city's active Leak Detection Program and maintain compliance with stated City CUP permit requirements. Additionally, the city will update the 5-year CIP to reflect system needs pursuant to leak detection activities.	Yes
Policy 1.2.26. Continue to implement SOPs in place for the review of all site development plans for potential groundwater quality impacts.	Yes
<p>Policy 1.2.27. The SJRWMD has the exclusive authority to regulate consumptive uses of water under Chapter 373, F.S. The City manager adopts regulations to ensure for the efficient operation of the reclaimed water system or for the health or safety of the general public or the customer, regarding the following matters:</p> <ul style="list-style-type: none"> ▪ The times of day or night during which the reclaimed water may be used by customers. ▪ The maximum rate of use of the reclaimed water. ▪ The right to inspect reclaimed water devices, facilities, and terminate service to reclaimed water system found to be in violation of any city ordinance, regulation or procedure. ▪ The right to impose the requirement that upon being connected to the shall not continue to be used for irrigation and shall be disconnected from the irrigation system (unless otherwise approved by the cognizant permitting agency and the city manager). ▪ The right to impose the mandatory payment of fees for the installation and usage of reclaimed water systems. Once service is connected, the user shall pay a minimum monthly charge set by resolution of the city commission. ▪ The right to temporarily discontinue service to any portion of, or the entire, reclaimed water system as deemed necessary by the .city's reclaimed water system, any existing wells on the subject property. 	Yes
Policy 1.2.28. Continue to document all un-metered water use such as fire fighting, sewer cleaning, main flushing, street cleaning and construction use. Additionally, the city will continue to require water meters for all schools, municipal buildings and municipal irrigation systems.	Yes
Policy 1.2.29. The City shall enforce restricted irrigation hours and rain sensor device requirements in compliance with State and local regulations.	Yes
Policy 1.2.30. Through fiscal years 2009-2011, the City shall evaluate the technical and financial feasibility of capturing stormwater at the Turnpike WWTP spray field to offset groundwater withdrawals.	Yes

Objective 1.3 Wetland Protection. Objective 1.3 calls for the protection and conservation of the City’s wetlands.

The policies under Objective 1.3 were reviewed in order to determine their continued relevance and applicability. Table CON3 below summarizes the results of this review.

TABLE CON3. CONSERVATION OBJECTIVE 1.3 POLICY REVIEW

Policy	Relevant
Objective 1.3. Wetland Protection. Wetlands and the natural functions of wetlands shall be protected from activities which alter their physical and hydrological nature.	Yes
Policy 1.3.1. The wetlands and shorelines within the City shall be protected through cooperation with the SJRWMD and FDEP who has jurisdictional authority for wetland, water quality, and submerged lands development and permitting.	Yes
Policy 1.3.2. Wetlands and shorelines shall be protected through the adoption of local level of service criteria for stormwater management as specified in the Drainage, Aquifer Recharge, and Capital Improvements Elements of this Growth Management Plan.	Yes
Policy 1.3.3. The City shall continue to implement floodplain ordinances through the adoption of Conservation Areas and Goals, Objectives, and Policies within the other elements of this plan that provide conservation and preservation mechanisms.	Yes
Policy 1.3.4. Wetlands should be protected through transfers of density within a site from wetland areas to upland areas and surface waters should be protected through drainage enhancements as identified within the Drainage Element of this Plan. Transfer of density shall only be allowed in residential developments and shall require a PUD. This transfer of density will be at one unit per one acre and will be applied to the upland areas within the same PUD.	Yes
Policy 1.3.5. The location of wetland areas on a site shall be accurately identified during site development review. The City shall not issue a development order or permit for a parcel until all wetland areas on that parcel have been identified and either dedicated in a conservation easement or appropriately mitigated.	Yes
<p>Policy 1.3.6. If direct impact upon wetlands by incompatible uses cannot be avoided, the following mitigation measures are applicable:</p> <ul style="list-style-type: none"> ▪ Mitigation will be allowed based upon no net loss of wetlands functions. ▪ Comply with the wetland protection standards of federal, state, regional and county agencies. ▪ Minimize impacts through innovative design layouts. ▪ Compensate for the impact by enhancing other degraded wetlands on-site, restoring natural functions of other wetlands on-site, creating new wetlands on-site, preserving significant upland areas, or providing off-site mitigation. ▪ A Wetland Alteration Permit must be obtained from the City unless federal, state or county permits eliminate the need to obtain one from the City, as determined by the City. ▪ Mitigation through restoration of degraded wetlands on-site or preservation of significant upland areas on-site will be encouraged rather than wetland creation. 	Yes
Policy 1.3.7. The City shall maintain within its Code of Ordinances minimum upland buffers of 25 feet and an average of 50 feet for wetlands, as defined by the St. Johns River Water Management District.	Yes
Policy 1.3.8. Continue to implement/enforce established codes pertaining to buffer size requirements, development setback requirements, setback requirements, native vegetation setback requirements, and stormwater swale requirements, pursuant to established city codes for construction site operators/owners of development to maintain. Elements of buffer zone requirements include the establishment of upland buffer zones on the landward extent of the wetland jurisdictional line as defined by SJRWMD criteria. The City will continue to enforce these requirements as part of the pre-construction review of buffer zone designs and as part of the construction inspection process already in place.	Yes

<p>Policy 1.3.9. The city will continue to regulate (by ordinance) and control construction site waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste that may cause adverse impacts to water quality, pursuant to Section 34-1 of Chapter 34 (Environment), Section 121-19 (Erosion Control Required), 121-23 (Standards for Lands Adjacent to Streams, Ponds, Lakes, and Wetlands), and Section 121-24 (Groundwater and Wellhead Protection) of Chapter 121 (Resource Protection Standards), and Appendix B (Standard Stormwater Management Facility Construction Specifications).</p>	<p>Yes</p>
<p>Policy 1.3.10. The City will continue to regulate stormwater discharges from pre and post-development construction pursuant to city codes and established Development Design Standards to maintain, confine and regulate runoff from polluting surface water, reducing erosion and sedimentation, preventing flooding and endangering the ecological balance of the environment in an effort to enhances landscape value, increases groundwater recharge, enhance water quality, and decreases groundwater consumption.</p>	<p>Yes</p>
<p>Policy 1.3.11. Continue to implement SOPs in place for the review of all site development plans for potential surface water quality impacts.</p>	<p>Yes</p>

Objective 1.4 Floodplains. Objective 1.4 addresses the conservation and protection of floodplains.

The policies under Objective 1.4 were reviewed in order to determine their continued relevance and applicability. Table CON4 below summarizes the results of this review.

TABLE CON4. CONSERVATION OBJECTIVE 1.4 POLICY REVIEW

Policy	Relevant
Objective 1.4. Floodplains. The City shall ensure long-range protection of the functions of the remaining floodplains.	Yes
Policy 1.4.1. The City shall formally adopt the FEMA Map that indicates 100-year floodplain hazard areas.	Yes
Policy 1.4.2. The City shall continue to regulate land use and development in floodplains by requiring conformance with the provisions of the Leesburg Floodplain Ordinance, requirements of National Flood Insurance Program as provided by FEMA, and the designation of Conservation Areas.	Yes
Policy 1.4.3. The City's Code of Ordinances shall require that no hazardous materials or wastes be stored within the 100-year floodplain.	Yes
Policy 1.4.4. The City's Code of Ordinances shall require that septic systems be prohibited within 200 feet of a floodplain, unless otherwise approved by the Florida Department of Health and Rehabilitative Services or the Florida Department of Environmental Protection.	Yes
Policy 1.4.5. The City's Code of Ordinances shall allow development in the floodplain only if State, County and local regulations are followed.	Yes

Objective 1.5 Protection of Fisheries, Wildlife, Minerals, and Vegetative Communities. Objective 5-1.5 addresses the protection of the City’s fisheries, wildlife, wildlife habitat, minerals, and vegetative communities.

The policies under Objective 1.5 were reviewed in order to determine their continued relevance and applicability. Table CON5 below summarizes the results of this review.

TABLE CON5. CONSERVATION OBJECTIVE 1.5 POLICY REVIEW

Policy	Relevant
Objective 1.5. Protection of Fisheries, Wildlife, Minerals, and Vegetative Communities. The City shall continue to promote the conservation and protection of wildlife, wildlife habitat, minerals, and vegetative communities.	Yes
Policy 1.5.1. The City shall assist in the application of, and compliance with, all state and federal regulations, which pertain to endangered and threatened species and species of special concern.	Yes
Policy 1.5.2. The City shall stringently enforce its tree protection ordinance to protect existing vegetative communities and wildlife habitat.	Yes
Policy 1.5.3. The City shall request assistance from and consult with the Florida Fish and Wildlife Conservation Commission (FFWCC), adjacent local governments, the USDA Soil Conservation Service, the Audubon Society, and the USDA Division of Forestry, prior to the issuance of a development order where Listed Species may be suspected to exist.	Yes
Policy 1.5.4. Development shall be prohibited within any established wildlife habitat easement. However, the City shall allow the transfer of density for the easement. Transfer of density shall only be allowed in residential developments and shall require a PUD. This transfer of density will be based on the underlying zoning or land use density, whichever is the most restrictive, and will be applied to the upland areas within the same PUD.	Yes
<p>Policy 1.5.5. In areas identified as being environmentally sensitive, or as having Listed Species within them, the following activities shall be regulated to ensure that such areas are preserved:</p> <ul style="list-style-type: none"> ▪ The removal, excavation, or dredging of soil, sand, gravel, minerals, organic matter, or materials of any kind; ▪ The changing of existing drainage characteristics, sedimentation patterns, flow patterns, or flood retention characteristics; ▪ The disturbance of the environmentally sensitive area's water level or water table by drainage, impoundment, or other means; ▪ The dumping or discharging of material, or the filling of an environmentally sensitive area with material; ▪ The placing of fill or the grading or removal of material that would alter topography; ▪ The destruction or removal of plant life that would alter the character of an environmentally sensitive area or wildlife habitat; and ▪ The conduct of an activity that results in a significant change of water temperature, a significant change of physical or chemical characteristics of environmentally sensitive area water sources, or the introduction of pollutants. 	Yes
Policy 1.5.6. The City shall maintain a comprehensive inventory of ecological communities and shall recommend such acquisition, through the Conservation and Recreation Land Program and the Save Our Rivers Program, of the most vulnerable communities as deemed necessary by the City.	Yes
Policy 1.5.7. The City shall develop an ordinance stating that mining operations, other than those existing at the time of annexation into the City, shall be prohibited within the City’s jurisdictional limits.	Policy should be revised. The City’s Code does include provisions to prohibit mining.

Objective 1.6 Air Quality. Objective 1.6 addresses the protection of the City's air quality.

The policies under Objective 1.6 were reviewed in order to determine their continued relevance and applicability. Table CON6 below summarizes the results of this review.

TABLE CON6. CONSERVATION OBJECTIVE 1.6 POLICY REVIEW

Policy	Relevant
Objective 1.6. Air Quality. The City shall meet and exceed the minimum air quality levels established by the FDEP.	Yes
Policy 1.6.1. On an annual basis, the City shall obtain a revised list of any identified air pollution generators in Leesburg from the Department of Environmental Protection	Yes
Policy 1.6.2. The City shall cooperate with the appropriate County departments and State and Federal agencies in monitoring air quality in the City.	Yes
Policy 1.6.3. The City shall continue existing efforts to maintain good ambient air quality through the adoption of codes, ordinances, and regulations that address issues of smoke, landscaping, and tree protection which contribute to the enhancement of air quality.	Yes
Policy 1.6.4. The City shall regulate wind related soil erosion by requiring stabilization practices recommended by the Soil Conservation Service.	Yes
Policy 1.6.5. The City shall develop an industrial land use ordinance, which governs the maintenance of pollutant emissions standards based on federal, state, and local standards.	Yes, revise policy to indicate the continuance of regulations

Objective 1.7 Soil Erosion. Objective 1.7 calls for the protection and conservation of the City’s soil resources.

The policies under Objective 1.7 were reviewed in order to determine their continued relevance and applicability. Table CON7 below summarizes the results of this review.

TABLE CON7. CONSERVATION OBJECTIVE 1.7 POLICY REVIEW

Policy	Relevant
Objective 1.7. Soil Erosion. The City shall consult with the USDA Soil Conservation Service on the use of Best Management Practices to minimize soil erosion problems as part of the development review process.	Yes
Policy 1.7.1. The City shall utilize topographic, hydrologic, and vegetative cover maps in the site plan review process to determine if the proposed development will have a negative impact.	Yes
Policy 1.7.2. The City’s Code of Ordinances shall require that all site developments utilize one of the following techniques in order to reduce soil erosion once development is complete: <ul style="list-style-type: none"> ▪ Sodding of site; ▪ Seeding of site; ▪ Intermediate cover (hay, tarps, etc.); and ▪ Other methods determined adequate by the City. 	Yes

Objective 1.8 Hazardous Waste. Objective 1.8 addresses the management of hazardous waste and the City’s continued coordination with Lake County.

The policies under Objective 1.8 were reviewed in order to determine their continued relevance and applicability. Table CON8 below summarizes the results of this review.

TABLE CON8. CONSERVATION OBJECTIVE 1.8 POLICY REVIEW

Policy	Relevant
Objective 1.8. Hazardous Waste. The City shall assist Lake County in implementing their Code of Ordinances, which address the reduction, disposal, and management of hazardous wastes.	Yes
Policy 1.8.1. The City shall assist the County in its efforts to manage hazardous wastes through educational programs that advise City residents on the problems and issues of hazardous waste.	Yes
Policy 1.8.2. The City shall continue training its employees to identify and inspect wastes before they are taken to waste disposal facilities sites.	Yes
Policy 1.8.3. The City shall continue its interlocal agreement with Lake County Fire and Rescue concerning accidents involving hazardous waste, or establish its own emergency response plan.	Yes

Objective 1.9 Mining. Objective 1.9 addresses discouraging mining activities.

The policies under Objective 1.9 were reviewed in order to determine their continued relevance and applicability. Table CON9 below summarizes the results of this review.

TABLE CON9. CONSERVATION OBJECTIVE 1.9 POLICY REVIEW

Policy	Relevant
Objective 1.9. Mining. The City shall discourage mining activities within the City's jurisdictional limits.	Yes
Policy 1.9.1. The City shall develop an ordinance which discourages mining in the City of Leesburg.	The policy should be revised. The City's Code does prohibit mining.

DRAINAGE ELEMENT

Objective 1.1. Flood Control. Objective 1.1 addresses the provision of maintaining the management of adopted stormwater level of service standards that meet or exceed state and federal regulations.

The policies under Objective 1.1 were reviewed in order to determine their continued relevance and applicability. Table D1. Below summarizes the results of this review.

TABLE D1. DRAINAGE ELEMENT OBJECTIVE 1.1 POLICY REVIEW

Policy	Relevant
Objective 1.1. Flood Control. The City shall achieve and maintain the following adopted stormwater management level of service standards that shall meet or exceed state and federal regulations for stormwater quality and quantity.	Yes
Policy 1.1.1. New development and redevelopment issued a development order shall meet the standards established by the Stormwater Management Ordinance, Chapter 28 of the City Code of Ordinance as follows: <ul style="list-style-type: none"> ▪ Principal arterial bridges – Protection from 100-year, 24-hour storm event ▪ Other bridges - Protection from 50-year, 24-hour storm event ▪ Cross drains - Protection from 25-year, 24-hour storm event ▪ Storm sewers - Flooding from 10-year, 24-hour storm event ▪ Detention/retention structures - Protection from 25-year, 24-hour storm event ▪ Canals, ditches, roadside swales or culverts for stormwater external to developments – Protection from 25-year, 24-hour storm event. ▪ Canals, ditches, roadside swales or culverts for stormwater internal to developments – Protection from 25-year, 24-hour storm event 	Yes
Policy 1.1.2. New development and redevelopment issued a development order shall meet the standards established for water quality by the Stormwater Management Ordinance, Chapter 28 of the City Code of Ordinance.	Yes
Policy 1.1.3. At a minimum, the peak post-development runoff rate for stormwater management system shall not exceed the peak pre-development runoff rate for a 3.5-inch, one-hour storm event. The recovery time for the retained volume shall be less than 72 hours.	Yes
Policy 1.1.4. If downstream facilities (from the positive outfall of the development) are inadequate to convey the peak discharge for the design storm event, the development shall be required to accommodate its proportion of basin runoff rate above the downstream systems actual capacity.	Yes
Policy 1.1.5. Stormwater treatment shall be required to serve the development through a stormwater treatment system which is site-specific; or serve sub-areas of the City and, if applicable, Lake County. Regardless of the area served, the stormwater treatment system must provide a level of treatment which meets the requirements of the Florida Administrative Code (F.A.C.), the City of Leesburg Code of Ordinance, and the criteria of the St. Johns River Water Management District.	Yes

Objective 1.2. Stormwater Master Plan. Objective 1.2 addresses the need to maintain a stormwater master plan to address existing deficiencies and coordinate the construction of new and replacement facilities.

The policies under Objective 1.2 were reviewed in order to determine their continued relevance and applicability. Table D2 below summarizes the results of this review.

TABLE D2. DRAINAGE ELEMENT OBJECTIVE 1.2 POLICY REVIEW

Policy	Relevant
Objective 1.2. Stormwater Master Plan. The City shall maintain a Stormwater Master Plan which establishes high water elevations, addresses existing deficiencies, and coordinates the construction of new and replacement facilities.	Yes
Policy 1.2.1. The City shall maintain a detailed inventory and analysis of the existing drainage facilities within its municipal boundaries in the City's Stormwater Master Plan.	Yes
Policy 1.2.2. The City shall maintain a digital map of the drainage facilities within the City and require new developments to provide copies of their stormwater design for incorporation into the City's digital map.	Yes
Policy 1.2.3. At a minimum, the City shall utilize the expertise of a professional engineer to run models of the City's stormwater system based upon critical design storm events and update the Stormwater Master Plan every five (5) years. Areas that have been annexed into or adjacent to the City's Urban Service Area since the time of the last study shall also be included in this analysis.	Yes
Policy 1.2.4. The Stormwater Master Plan shall include review of stormwater quality discharged into surface water bodies and recommendations for needed improvements.	Yes
Policy 1.2.5. The Stormwater Master Plan shall establish priorities for stormwater system replacements, insuring correction of existing drainage facility deficiencies, and providing for future facility needs.	Yes
Policy 1.2.6. The City shall maintain its stormwater utility fund and shall adjust the rate fees every three (3) years to provide for inflation and increase construction costs.	Yes
Policy 1.2.7. Annually, the City shall rely on the Stormwater Master Plan to prepare the City's annual budget for funding of stormwater facility replacement and deficiency upgrades.	Yes
Policy 1.2.8. The City shall utilize the Stormwater Master Plan for preparation of the five (5) year Capital Improvement Plan to correct existing deficiencies and prepare for future stormwater demands.	Yes

Objective 1.3. Floodplain. Objective 1.3 calls for limiting development within the 100 year floodplain.

The policies under Objective 1.3 were reviewed in order to determine their continued relevance and applicability. Table D3 below summarizes the results of this review.

TABLE D3. DRAINAGE ELEMENT OBJECTIVE 1.3 POLICY REVIEW

Policy	Relevant
Objective 1.3. Flood Plain. The City shall restrict development within the 100-year floodplain to those uses, which will not adversely affect the capacity of the floodplain to store water.	Yes
Policy 1.3.1. The City Code of Ordinances shall require compensating storage volumes for floodwater displaced by development. Compensating storage volumes shall be provided above the high water table elevation and below the elevation of the 100-year flood.	Yes
Policy 1.3.2. The City shall require the finished floor elevation of all structures within the flood plain to be a minimum of eighteen (18) inches above the 100-year flood elevation and twelve inches above the crown of the adjacent street. .	Yes
Policy 1.3.3. Where feasible, the floodplain shall be reserved for conservation, open space and recreation uses to preserve the natural flow of runoff.	Yes
Policy 1.3.4. The City shall strive to protect and/or acquire natural depressional areas within its Urban Service Area to protect existing flood storage volumes.	Yes

Objective 1.4. Development Impacts. Objective 1.4 calls for the protection of the City’s natural resources.

The policies under Objective 1.4 were reviewed in order to determine their continued relevance and applicability. Table D4 below summarizes the results of this review.

TABLE D4. DRAINAGE ELEMENT OBJECTIVE 1.4 POLICY REVIEW

Policy	Relevant
Objective 1.4. Development Impacts. The City shall protect natural resources and the existing municipal stormwater network from the impacts of development and construction.	Yes
Policy 1.4.1. The City will continue to maintain a stormwater utility fee to provide funding for the maintenance and operations of stormwater facilities within the City of Leesburg. The City shall update the stormwater utility fee every three years.	Yes
Policy 1.4.2. The City shall review detailed calculations for new projects prepared by a registered professional engineer which show that retention and detention will be accomplished to meet the adopted level of service, and that there will be no negative impacts to downstream water quality or quantity.	Yes
Policy 1.4.3. The City shall review the characteristics and limitations of soil types for new projects with regard to percolation and infiltration.	Yes
Policy 1.4.4. The City shall review the impacts of proposed topographical changes for new development.	Yes
Policy 1.4.5. The City shall review the impact proposed stormwater system shall have on adjacent native vegetation and/or wetlands.	Yes
Policy 1.4.6. The City shall require that erosion and sediment control practices be utilized to protect water bodies, wetlands and watercourses from siltation during construction activities.	Yes
Policy 1.4.7. The City shall require adequate easements for stormwater system maintenance and conveyance.	Yes
Policy 1.4.8. New developments and redevelopment will be required to accommodate upland flow, which presently discharges through the site.	Yes

Objective 1.5. Intergovernmental Coordination. Objective 1.5 addresses the education of citizens and intergovernmental coordination regarding stormwater issues and providing adequate levels of service.

The policies under Objective 1.5 were reviewed in order to determine their continued relevance and applicability. Table D5 below summarizes the results of this review.

TABLE D5. DRAINAGE ELEMENT OBJECTIVE 1.5 POLICY REVIEW

Policy	Relevant
Objective 1.5. Intergovernmental Coordination. The City of Leesburg shall educate citizens and coordinate with applicable jurisdictions to address stormwater issues of mutual concern and to provide adequate levels of service.	Yes
Policy 1.5.1. The Stormwater Master Plan shall be developed in coordination with Lake County and regulatory agencies, such as the Florida Department of Environmental Protection, the St. Johns River Water Management District, and the Florida Department of Transportation.	Yes
Policy 1.5.2. The Stormwater Master Plan process will include public participation review of the plan by affected citizens and City Advisory Committees.	Yes
Policy 1.5.3. Maintain a complaint monitoring system to log complaints and initiate work orders for corrective actions and audit monthly activity reports generated for performance evaluation.	Yes
Policy 1.5.4. The City will support the St. Johns Water Management District's Surface Water Improvement and Management (SWIM) program regulations, with specific emphasis on Lake Griffin and Lake Harris.	Yes

FUTURE LAND USE ELEMENT

Objective 1.1 Land Use Categories and Overlays. Objective 1.1 calls for the City to maintain regulations for land use categories and a Future Land Use Map to ensure the coordination of future land uses with existing and adjacent land uses and those land uses which support the implementation of the city's 10-Year Water Supply Facilities Work Plan.

The policies under Objective 1.1 were reviewed in order to determine their continued relevance and applicability. Table FLU1 below summarizes the results of this review.

TABLE FLU1. FUTURE LAND USE ELEMENT OBJECTIVE 1.1 POLICY REVIEW

Policy	Relevant																						
Objective 1.1. Land Use Categories and Overlays. The City shall maintain regulations for land use categories and a Future Land Use Map to ensure the coordination of future land uses with existing and adjacent land uses and those land uses which support the implementation of the city's 10-Year Water Supply Facilities Work Plan.	Yes																						
Policy 1.1.1. Future Land Use Map. The adopted Future Land Use Map shall contain and identify appropriate locations for the following land use categories, as defined in the data and analysis of this element. <table border="1" data-bbox="321 976 1015 1411" style="margin-left: 40px;"> <thead> <tr> <th>Land Use Categories</th> <th>Maximum Density/Intensity</th> </tr> </thead> <tbody> <tr> <td>Estate Density Residential</td> <td>Up to 4 units/gross acre</td> </tr> <tr> <td>Low Density Residential</td> <td>Up to 8 units/gross acre</td> </tr> <tr> <td>Medium Density Residential</td> <td>Up to 12 units/gross acre</td> </tr> <tr> <td>High Density Residential</td> <td>Up to 18 units/gross acre</td> </tr> <tr> <td>Downtown Mixed-Use</td> <td>4.0 FAR/100% ISR</td> </tr> <tr> <td>General Commercial</td> <td>2.0 FAR/80% ISR</td> </tr> <tr> <td>Institutional</td> <td>2.0 FAR/75% ISR</td> </tr> <tr> <td>Industrial</td> <td>2.0 FAR/80% ISR</td> </tr> <tr> <td>Recreation</td> <td>0.25 FAR</td> </tr> <tr> <td>Conservation</td> <td>Development must comply with applicable regulations</td> </tr> </tbody> </table>	Land Use Categories	Maximum Density/Intensity	Estate Density Residential	Up to 4 units/gross acre	Low Density Residential	Up to 8 units/gross acre	Medium Density Residential	Up to 12 units/gross acre	High Density Residential	Up to 18 units/gross acre	Downtown Mixed-Use	4.0 FAR/100% ISR	General Commercial	2.0 FAR/80% ISR	Institutional	2.0 FAR/75% ISR	Industrial	2.0 FAR/80% ISR	Recreation	0.25 FAR	Conservation	Development must comply with applicable regulations	The land use categories will need updating to include new mixed use designations.
Land Use Categories	Maximum Density/Intensity																						
Estate Density Residential	Up to 4 units/gross acre																						
Low Density Residential	Up to 8 units/gross acre																						
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Industrial	2.0 FAR/80% ISR																						
Recreation	0.25 FAR																						
Conservation	Development must comply with applicable regulations																						
Policy 1.1.2. Density/Intensity. The City shall adopt maximum densities and intensities for each land use category which encourage economic development while protecting the natural environment as indicated in the above table.	Yes																						
Policy 1.1.3. Zoning Districts. By 2004, the City shall maintain a zoning matrix which shall establish zoning districts that correspond to specific land use categories. The matrix shall further define allowable densities and intensities in each zoning district.	This has not yet been done. New target date needed.																						
Policy 1.1.4. Recreation and Open Space. Public or private lands may be designated as recreation and open space. If the facility is resourced-based, a maximum of 25% impervious area shall be allowed in areas designated as Recreation and Open Space to ensure their protection, proper development and future public use and benefit. Urban infill plazas/areas and special use facilities (such as community centers) do not have to adhere to the 25% maximum impervious surface requirement; these facilities will follow the regulations for downtown mixed-use or commercial development. If development occurs in this land use category, it should be for a public benefit.	Yes																						
Policy 1.1.5. Conservation Overlay. Properties that are designated as Conservation	Yes																						

Overlay areas may potentially contain wildlife habitat areas, hydric soils/wetlands (as defined in the Conservation Element), special vegetative communities, areas within a public water well radii of 500 feet, 100 year floodplain areas, and other areas subject to environmental or topographic constraints. Conservation Overlay areas are subject to the following conditions for approval:

- A final determination of the suitability for development of any individual parcel, as it relates to a Conservation Overlay area on the Future Land Use Map, shall be determined prior to issuance of any development approval.
- The Conservation Overlay area on the Future Land Use Map is not to be considered the exact boundary of the conservation area, but to act as an indicator of a potential conservation area. The exact boundary shall be determined by a qualified professional at the expense of the Developer.
- The Conservation Overlay area is not all inclusive and other areas that do not fall within the boundaries that meet the definition of conservation areas are also subject to the regulations affecting them.
- Development approval will be subject to an Environmental Study as to the extent of the impact of development or redevelopment for any lands within Conservation Overlay areas.
- Natural resources discovered as a result of the required Environmental Study will be protected. The Environmental Study will require that a qualified professional analyze the natural functions of eco-systems and connectivity of resource corridors. A conservation easement will be required to protect the functions of natural resources. Mitigation may be allowed on a case by case basis through the appropriate reviewing agencies.
- If an area within the Conservation Overlay area is determined to be developable and all mitigation requirements have been met, then the underlying land use on the Future Land Use Map will apply.
- Areas that are designated as conservation easements and over 10 acres in size will be required to amend the land use designation to Conservation during the City's next regularly scheduled amendment cycle.
- Any property in a Conservation Overlay area is encouraged to undergo the planned unit development procedure which includes site specific plan approval and the clustering of density to protect these areas.

Objective 1.2. Protect Neighborhoods and Diversify Housing. Objective 2.2 requires the City to preserve and protect stable residential neighborhoods, to provide opportunities for diverse residential areas and to encourage various housing types to meet the life-styles and needs of all residents.

The policies under Objective 1.2 were reviewed in order to determine their continued relevance and applicability. Table FLU2 below summarizes the results of this review.

TABLE FLU2. FUTURE LAND USE ELEMENT OBJECTIVE 1.2 POLICY REVIEW

Policy	Relevant
Objective 1.2. Protect Neighborhoods and Diversify Housing. The City will preserve and protect stable residential neighborhoods, provide opportunities for diverse residential areas and encourage various housing types to meet the life-styles and needs of all residents.	Yes
Policy 1.2.1. Housing Diversity. The Future Land Use Map shall contain an adequate diversity of lands for residential uses to meet the future demand for residential densities identified in the Housing Element.	Yes
Policy 1.2.2. Neighborhood Capital Improvements. The City of Leesburg shall prioritize needed improvements to maintain the quality of its neighborhoods and secure funding for said improvements through local funding, interlocal agreements with Lake County and grants from various state and federal agencies.	Yes
Policy 1.2.3. Neighborhood Lakes. The City shall encourage subdivisions to be designed to maintain lake edges for ring roads or linear parks and the enjoyment of the neighborhood, rather than allowing residential lots to completely encompass the lakes.	Yes
Policy 1.2.4. New Residential Development. Encourage high standards of architectural design and landscaping for new residential construction through the land development regulations and development review process.	Yes
Policy 1.2.5. Innovative Housing and Development. Periodically review and amend the land development regulations to permit innovative housing types and subdivision designs that are compatible with the character of Leesburg.	Yes
Policy 1.2.6. Energy Efficient Housing. Administering the State's Energy Efficiency Codes with respect to new construction.	Yes
Policy 1.2.7. Neighborhood Roadways. Protect single-family residential neighborhoods from the potential undesirable impacts of through-traffic movements by assuring that alternate traffic improvements are considered to prevent overloading the existing roads, as well as providing adequate buffering and landscaping.	Yes
Policy 1.2.8. Impacts of Infill. Protect single-family residential neighborhoods from the potential undesirable impacts of in-fill developments by assuring that in-fill developments shall be of a design, type, height, bulk and density not to overpower the existing architecture of the neighborhood.	Yes
Policy 1.2.9. Residential Density. Balance residential densities with the capacity of existing or scheduled improvements to public services and facilities through appropriate zoning and concurrency regulations, as well as the development review process.	Yes
Policy 1.2.10. Require that proposed residential densities be compatible with existing development in the area and that it be regulated so as to avoid detrimental effects on the existing development and the environment.	Yes
Policy 1.2.11. Code Enforcement. The City shall periodically evaluate the program for the systematic inspection and enforcement of the City's codes and ordinances relative to housing and litter to prevent blighted area from developing.	Yes

Objective 1.3. Redevelopment. Objective 1.3 calls upon the City to encourage redevelopment and renewal of blighted areas in order to maintain and enhance the quality of life and economic base throughout Leesburg.

The policies under Objective 1.3 were reviewed in order to determine their continued relevance and applicability. Table FLU3 below summarizes the results of this review.

TABLE FLU3. FUTURE LAND USE ELEMENT OBJECTIVE 1.3 POLICY REVIEW

Policy	Relevant
Objective 1.3. Redevelopment. The City will encourage redevelopment and renewal of blighted areas to maintain and enhance the quality of life and economic base throughout Leesburg.	Yes
Policy 1.3.1. Inventory. By 2007, Leesburg shall inventory the remaining areas of the City identified as blighted i.e. developed areas containing substandard or lacking infrastructure including paved roads, central sewer and central water and continue to initiate programs or prepare goals to address those needs.	The City identified US27/441 corridor and designated it a CRA. The policy needs to be updated.
Policy 1.3.2. Blighted Areas. If additional blighted or otherwise deteriorated areas develop within the City, the areas shall be targeted for special consideration through a redevelopment plan and the City shall pursue available federal, state, county and local funds for redevelopment.	Yes
Policy 1.3.3. Redevelopment and Infill Limitations. If necessary, the City may reduce land development regulation limitations on infill and redevelopment activities consistent with the land uses and densities indicated in this plan in situations that will not jeopardize public health, safety or welfare.	Yes

Objective 1.4 Sustainable Development. Objective 1.4 addresses the need for the City of Leesburg to propose a Smart Growth development pattern that makes efficient use of the developable land, fully utilizes urban services and infrastructure, promotes a wide variety of transportation and housing options, absorbs and effectively serves a significant portion of the anticipated future population growth of the City, protects the architectural and environmental character of the City through compatible, high quality, and environmentally sensitive development practices, and recognizes the City's role as a regional hub of commerce and employment.

The policies under Objective 1.4 were reviewed in order to determine their continued relevance and applicability. Table FLU4 below summarizes the results of this review.

TABLE FLU4. FUTURE LAND USE ELEMENT OBJECTIVE 1.4 POLICY REVIEW

Policy	Relevant
Objective 1.4. Sustainable Development. The City of Leesburg shall propose a Smart Growth development pattern that makes efficient use of the developable land, fully utilizes urban services and infrastructure, promotes a wide variety of transportation and housing options, absorbs and effectively serves a significant portion of the anticipated future population growth of the City, protects the architectural and environmental character of the City through compatible, high quality, and environmentally sensitive development practices, and recognizes the City's role as a regional hub of commerce and employment.	Yes
Policy 1.4.1. Mixed-Use Development. Mixed-use developments and mixed-use buildings shall be encouraged within the City of Leesburg with appropriate buffers between uses to ensure compatibility.	Yes
Policy 1.4.2. Infill Development. Compatible, higher density commercial and residential infill development shall be encouraged within the City of Leesburg's urban areas.	Yes
Policy 1.4.3. New Development. New development should promote a sustainable land development pattern.	Yes
Policy 1.4.4. Traditional Neighborhood Development. Traditional neighborhood development patterns shall be encouraged in areas that can appropriately handle the density.	Yes
Policy 1.4.5. Economic Development. Discretionary block grant and local funding for affordable housing and economic development should be used to support a Smart Growth development pattern.	Yes
Policy 1.4.6. Industrial Development. Industrially zoned land should be reserved for industrial uses.	Yes
Policy 1.4.7 Environmental Sensitivity. Environmentally sensitive areas should be identified and preserved while allowing alternatives to development that protect private property rights.	Yes
Policy 1.4.8 Existing Development. Existing neighborhoods near urban areas should be strengthened through infill development, housing rehabilitation, proactive enforcement of zoning and building standards, and housing code enforcement.	Yes
Policy 1.4.9. Clustering. Developments may be allowed to transfer densities on the site from environmentally sensitive areas to upland areas that are more suitable for development permitted the project goes through the planned unit development process and does not exceed a transfer density of 1 unit per 1 acre.	Yes
<p>Policy 1.4.10. Areas of Critical State Concern. When all or a portion of the land in the City's corporate city limits is or becomes part of a designated area of critical state concern, the city will:</p> <ul style="list-style-type: none"> ▪ clearly identify areas of critical state concern on the Existing Land Use Map. ▪ clearly identify these locations in those portions of the city's Comprehensive Plan that are applicable to the area of critical state concern. ▪ evaluate its current and proposed land uses for compatibility with the Comprehensive Plan requirements and all other regulations governing land uses for areas of critical state concern. 	There are no Areas of Critical State Concern within or close to the City boundary, nor are any planned. The policy is not required.

Objective 1.5. Natural Resource Protection. Objective 1.5 requires the City to maintain land development regulations that protect natural resources (such as, groundwater, surface water, floodplains, wildlife habitat, wetlands and other vegetative communities) and areas of critical state concern from the impact of development. In addition, it requires the City to limit development in areas that have inadequate soils, topography or other constraints to protect public health and welfare.

The policies under Objective 1.5 were reviewed in order to determine their continued relevance and applicability. Table FLU5 below summarizes the results of this review.

TABLE FLU5. FUTURE LAND USE ELEMENT OBJECTIVE 1.5 POLICY REVIEW

Policy	Relevant
Objective 1.5. Natural Resource Protection. The City shall maintain land development regulations that protect natural resources (such as, groundwater, surface water, floodplains, wildlife habitat, wetlands and other vegetative communities) and areas of critical state concern from the impact of development. Additionally, the City will limit development in areas that have inadequate soils, topography or other constraints to protect public health and welfare.	Yes
Policy 1.5.1. Carrying Capacity. Development Orders will be approved only in those areas which are primarily capable of supporting the impacts of development.	Yes
Policy 1.5.2. Aquifer Recharge. The City shall explore the feasibility of an aquifer recharge ordinance, which would provide incentives for developers to minimize impervious surfaces in prime recharge areas.	The City has decided not to pursue this further. The policy should be deleted.
Policy 1.5.3. Septic Tanks. Septic tanks will only be allowed if the Environmental Services Department determines that extension of central sewer service is not feasible. When financially feasible, the City shall extend central sewer service to all developed properties within the current City limits. The City will also coordinate with the County to limit septic tank permits in unincorporated areas adjacent to the City's urban boundary.	Yes
Policy 1.5.4. Sewer. All previously developed properties are required to connect to central sewer when it becomes available within 200 feet of the property and their system has been determined to be detrimental to the health, safety, and welfare of the general public. All new development and redevelopment is required to connect to or extend the central sewer system to provide service to said development.	Yes
Policy 1.5.5. Septic/Soils. By 2006, the City shall complete a study that identifies all existing development that is utilizing septic systems on unsuitable soils. The City shall pursue funding to prioritize the retrofit of these developments and connect them to the central system.	Study completed, policy to be updated.
Policy 1.5.6. By 2004, the City of Leesburg shall adopt as part of the Land Development Code measures to protect potable water wellfields and environmentally sensitive lands.	The City has an ordinance in place to protect its wellfields. The policy should be updated accordingly.
Policy 1.5.7. Wellheads. Industrial and commercial land uses that produce hazardous wastes and any other land use determined by the City to be potentially detrimental shall be prohibited within 500 feet of all public potable water well radii.	Yes
Policy 1.5.8. Floodplains. The City shall maintain a floodplain management	Yes

<p>ordinance which includes the development standards required for participation in the National Flood Insurance Program. Furthermore, the ordinance shall require that new construction or substantial improvement of any structure have the lowest floor elevated to eighteen (18) inches above the established 100-year flood elevation.</p>	
<p>Policy 1.5.9. Stormwater. The City shall maintain stormwater management requirements in the Code of Ordinances which provide specific standards for the design of on-site stormwater systems, as well as strategies and measures to minimize runoff into natural water bodies.</p>	<p>Yes</p>
<p>Policy 1.5.10. Stormwater Master Plan. No development orders shall be issued unless the proposed development is determined to be in compliance with the City's Stormwater Master Plan.</p>	<p>Yes</p>
<p>Policy 1.5.11. Environmental Study. The City shall utilize the Conservation Overlay map, as well as, the natural vegetative map, FEMA, USGS Soil Conservation Service and the <u>Hydric Soils of Florida Handbook</u> to identify properties which have potential development constraints based upon hydric soils, wetland and vegetation, wildlife species, flood hazard potential or other topographic constraints, and, if necessary, require an Environmental Study.</p>	<p>Yes</p>
<p>Policy 1.5.12. Conservation Easements. Areas determined to need protection through the Environmental Study process will be placed into a permanent conservation easement or appropriately mitigated prior to final development order approval.</p>	<p>Yes</p>
<p>Policy 1.5.13. Lake Buffers/Fill. The minimum upland lake buffer shall be fifty (50) feet. No fill shall be placed in lakes, except as permitted by applicable state, regional and federal agencies. The City will observe safe development lines for the surrounding lakes.</p>	<p>Yes</p>
<p>Policy 1.5.14. Wetlands. Wetlands shall be delineated on the site plan according to FDEP, SJRWMD, and USACOE definitions, whichever standard is more restrictive. Wetlands shall mean those areas established as jurisdictional by the above agencies.</p>	<p>Yes</p>
<p>Policy 1.5.15. Wetland Buffers. The minimum vegetative cover buffer required upland from a wetland is twenty-five (25) feet.</p>	<p>Yes</p>
<p>Policy 1.5.16. Areas of Critical State Concern. Revise city Land Development Regulations as necessary to protect land designated as an area of critical state concern in accordance with State of Florida requirements.</p>	<p>There are no Areas of Critical State Concern within or close to the City boundary, nor are any planned. The policy is not required.</p>

Objective 1.6. Land Use Compatibility. Objective 1.6 requires the City to ensure that future development is consistent with the adopted Future Land Use Map and supports the city's 10-Year Water Supply Facilities Work Plan. In addition, it prohibits the expansion of existing incompatible uses and requires such uses to be eliminated, when feasible.

The policies under Objective 1.6 were reviewed in order to determine their continued relevance and applicability. Table FLU6 below summarizes the results of this review.

TABLE FLU6. FUTURE LAND USE ELEMENT OBJECTIVE 1.6 POLICY REVIEW

Policy	Relevant
Objective 1.6. Land Use Compatibility. Future development must be consistent with the adopted Future Land Use Map and support the city's 10-Year Water Supply Facilities Work Plan. Existing incompatible uses shall not be allowed to expand and shall be eliminated, when feasible.	Yes
Policy 1.6.1. Inconsistencies. Proposed land use amendments which are inconsistent with the character of the community or inconsistent with adjacent future land uses shall not be approved by the City.	Yes
Policy 1.6.2. Redevelopment/Demolition. By 2004, the City's Code of Ordinances shall contain provisions that prohibit the repair or rehabilitation of an inconsistent structure that is abandoned or damaged (even if by natural causes) beyond fifty (50) percent of its replacement value and require demolition of the structure. Redevelopment of the property will only be allowed if it is consistent with the Future Land Use Map.	This has been done, policy should be updated accordingly.
<p>Policy 1.6.3. Conversions. In areas where residences can be converted to commercial uses, the following standards will apply to ensure the protection of established neighborhoods and feasibility of the proposed changes:</p> <ul style="list-style-type: none"> ▪ The roadways, utilities and access to the property must be adequate to support the proposed change. ▪ Adequate parking must be provided for the proposed use of the property, including the standards of the American Disabilities Act. ▪ Appropriate buffering will be required adjacent to existing residences. ▪ The size and lighting of the signage for the proposed use must be consistent with the character of the neighborhood. ▪ Ensure that the proposed site plan adequately addresses drainage and stormwater management, open space, safe and convenient on-site traffic flow, safe and adequate ingress and egress, and adequate vehicle parking. 	Yes
Policy 1.6.4. The City's Land Development Code shall contain land development regulations that help provide methods to address land use compatibility, e.g., buffering and setbacks.	Yes
Policy 1.6.5. Compatibility. Compatibility with surrounding established neighborhoods shall be considered during the Comprehensive Plan amendment process. This compatibility will include consideration of surrounding housing types, neighborhood stability, transitional uses and scheduled infrastructure improvements, including those planned improvements stated in the city's 10-Year Water Supply Facilities Work Plan.	Yes
Policy 1.6.6. When all or a portion of the land in the corporate city limits is or becomes part of a designated area of critical state concern, the city will evaluate its current and proposed land uses for compatibility with the Comprehensive Plan	There are no Areas of Critical State Concern within or close to the City boundary, nor are

requirements and all other regulations governing land uses for areas of critical state concern.	any planned. The policy is not required.
Policy 1.6.7. Buffers. Low-density residential areas shall be buffered from intensive commercial and industrial land uses. This will be accomplished by locating less intensive transitional uses in between, or by buffering with berms, trees, walls or other methods to be included in the Land Development Code as deemed appropriate by the City.	Yes
Policy 1.6.8. The City shall maintain a landscape ordinance that requires adequate buffering between incompatible uses.	Yes
Policy 1.6.9. The City shall maintain site design requirements and subdivision regulations in the Land Development Code which adequately address the impacts of new development on adjacent properties in all land use categories and zoning districts.	Yes
Policy 1.6.10. The City's land development regulations shall limit signage and the glare from lighting which can be viewed from residential property and restrict the location of signs which interfere with traffic flow and sight distance.	Yes
Policy 1.6.11. Industrial. As implemented through the adoption of the City's land development regulations, lands designated "Industrial" on the Future Land Use Map shall also serve as an area to locate authorized land uses and activities which could have adverse secondary effects (e.g. increased crime; neighborhood deterioration and blight; property devaluation; economic deterioration; health risks; and other adverse effects) on residential areas, religious institutions, schools, parks, day care centers, and other public institutions located within the City.	Yes

Objective 1.7. Transportation/Land Use Compatibility. Objective 1.7 calls for the City to ensure that population densities, housing types, employment patterns, and land uses are consistent with the City’s transportation network.

The policies under Objective 1.7 were reviewed in order to determine their continued relevance and applicability. Table FLU7 below summarizes the results of this review.

TABLE FLU7. FUTURE LAND USE ELEMENT OBJECTIVE 1.7 POLICY REVIEW

Policy	Relevant
Objective 1.7. Transportation/Land Use Compatibility. The City will ensure that population densities, housing types, employment patterns, and land uses are consistent with the City’s transportation network.	Yes
Policy 1.7.1. Curb-cuts and points of access to the traffic circulation system shall be minimized.	Yes
Policy 1.7.2. Shared driveways and cross access between adjacent properties shall be encouraged.	Yes
Policy 1.7.3. Proposed transportation improvements shall be consistent with the land use patterns on the Future Land Use Map.	Yes
Policy 1.7.4. Land uses that generate high traffic and truck counts shall be encouraged to locate adjacent to arterial roads and mass transit systems.	Yes
Policy 1.7.5. The City shall require an adequate quantity of on-site parking to accommodate land uses.	Yes
Policy 1.7.6. The City shall require new developments to provide safe and convenient on-site traffic flow.	Yes

Objective 1.8. Adjacent Jurisdictions. Objective 1.8 calls upon the City to promote compatibility of adjacent land uses with Lake County and its neighboring cities.

The policies under Objective 1.8 were reviewed in order to determine their continued relevance and applicability. Table FLU8 below summarizes the results of this review.

TABLE FLU8. FUTURE LAND USE ELEMENT OBJECTIVE 1.8 POLICY REVIEW

Policy	Relevant
Objective 1.8. Adjacent Jurisdictions. The City shall promote compatibility of adjacent land uses with Lake County and the neighboring cities.	Yes
Policy 1.8.1. When reviewing land use amendments, the City shall consider the existing and proposed land uses in any jurisdictions that are adjacent to the proposed amendment.	Yes
Policy 1.8.2. JPA. The City shall continue to pursue a Joint Planning Agreement with the County and adjacent cities.	A target date should be established.
Policy 1.8.3. Annexation. The City shall pursue a policy of annexation which will provide for the most efficient use of public facilities and services, eliminate areas of jurisdictional problems, and provide for sound growth and development of the City and surrounding area.	Yes
Policy 1.8.4. In order to reduce land use conflicts and for efficient public service provision, the City shall investigate and, where feasible, annex all enclaves as soon as possible.	Yes – should be updated to refer to continuity.

Objective 1.9. Capital Improvements. Objective 1.9 seeks to ensure that the City promotes development to occur where commitments have been made for requisite facilities and services in order to discourage urban sprawl.

The policies under Objective 1.9 were reviewed in order to determine their continued relevance and applicability. Table FLU9 below summarizes the results of this review.

TABLE FLU9. FUTURE LAND USE ELEMENT OBJECTIVE 1.9 POLICY REVIEW

Policy	Relevant
Objective 1.9. Capital Improvements. Promoting development to occur where commitments have been made for requisite facilities and services shall discourage urban sprawl.	Yes
Policy 1.9.1. Capital Improvements shall be prioritized in the Capital Improvements Element to be constructed on the basis of growth-related needs, those needs identified in the city's 10-Year Water Supply Facilities Work Plan, and those needs which support adopted level of service standards.	Yes
Policy 1.9.2. To ensure that facilities and services meet or exceed the City's level of service standards and support required water supply projects identified in the city's 10-Year Water Supply Facilities Work Plan, the capital improvements schedule will be updated annually.	Yes
Policy 1.9.3. The City of Leesburg shall address the issue of the provision of central sewer and water, as well as transportation, with Lake County. Interlocal agreements shall spell-out the responsibilities of each jurisdiction including funding and timing of expansion/improvements.	Yes
Policy 1.9.4. Capital Improvements that are identified in the city's 10-Year Water Supply Facilities Work Plan as being required in the first 5-years of the applicable 10-year planning period shall be prioritized in the Capital Improvements Element.	Yes

Objective 1.10. Concurrency. Objective 1.10 requires the City to ensure that future development is provided essential services and facilities at acceptable standards through the establishment of a growth management program that incorporates a number of requirements into the site plan review process and the City's concurrency management system to best serve the needs of current and future City of Leesburg residents.

The policies under Objective 1.10 were reviewed in order to determine their continued relevance and applicability. Table FLU10 below summarizes the results of this review.

TABLE FLU10. FUTURE LAND USE ELEMENT OBJECTIVE 1.10 POLICY REVIEW

Policy	Relevant
Objective 1.10. Concurrency. The City shall ensure that future development is provided essential services and facilities at acceptable standards through the establishment of a growth management program that incorporates the following policies into the site plan review process and the City's concurrency management system to best serve the needs of current and future City of Leesburg residents.	Yes
Policy 1.10.1. Development Orders. Development Orders will be granted only if requisite facilities and services are available or will be available concurrent with the projects impacts at/or above the City's adopted level of service standard.	Yes
Policy 1.10.2. Development Orders and permits will be specifically conditioned on the availability of such facilities and services.	Yes

Objective 1.11. Historic Preservation. Objective 1.11 requires the City to identify, designate and protect historically significant housing and significant archeological sites and ensure the preservation of local historical, cultural and archaeological features through their identification, designation, and protection.

The policies under Objective 1.11 were reviewed in order to determine their continued relevance and applicability. Table FLU11 below summarizes the results of this review.

TABLE FLU11. FUTURE LAND USE ELEMENT OBJECTIVE 1.11 POLICY REVIEW

Policy	Relevant
Objective 1.11. Historic Preservation. The City shall identify, designate and protect historically significant housing and significant archeological sites and ensure the preservation of local historical, cultural and archaeological features through their identification, designation, and protection.	Yes
Policy 1.11.1. Assist the City of Leesburg's Historical Society in identifying and providing landmark designation for historically significant housing in the City.	Yes
Policy 1.11.2. The City shall require all development proposals to include a preliminary survey of archaeological, cultural and historical features for those sites that are known to contain such features, or for which there is a high probability that they contain these features.	Yes
Policy 1.11.3. The preliminary survey will be used prior to the commencement of development, including land clearing activities, to develop and implement a plan to protect these historical, cultural and/or archaeological features, in coordination with the Department of State, Division of Historical Resources.	Yes
Policy 1.11.4. The City will protect and preserve its historic sites and properties, buildings, artifacts, and objects of antiquity which have scientific or historic value, or are of interest to the public.	Yes
Policy 1.11.5. Development shall be prohibited which alters or damages any site or building determined to be historically significant that is contained in the Florida Master Site File maintained by the State of Florida.	Yes
Policy 1.11.6. By 2004, the City shall maintain an electronic database that identifies the location of potential archeological and historic sites and review all future development and redevelopment to prevent any negative impact to these sites.	This has not yet been achieved. New target date needed.
Policy 1.11.7. By 2004, the City shall establish more restrictive standards for historic preservation in the Land Development Code to ensure the protection of historically significant cultural sites and historic structures from development or redevelopment.	These have been established for properties in the Historic District. Policy to be updated.

Objective 1.12. Public Utilities. Objective 1.12 requires the City to maintain regulations and procedures in the Land Development Code which will require the provision of land for utility facilities necessary to support development, and which will limit land development activities when such land for utility facilities is not available.

The policies under Objective 1.12 were reviewed in order to determine their continued relevance and applicability. Table FLU12 below summarizes the results of this review.

TABLE FLU12. FUTURE LAND USE ELEMENT OBJECTIVE 1.12 POLICY REVIEW

Policy	Relevant
Objective 1.12. Public Utilities. The City will maintain regulations and procedures in the Land Development Code which will require provision of land for utility facilities necessary to support development and will limit land development activities when such land for utility facilities is not available, as specified in the following policies:	Yes
Policy 1.12.1. Proposed development shall be reviewed in relation to existing and projected utility systems and any land needs of these systems; such as, water and sewer plants; transmission corridors for electric and other utilities; easements for maintenance; and, other requirements.	Yes
Policy 1.12.2. No development orders shall be issued unless it can be demonstrated that the land required for utility systems serving the City will be preserved.	Yes
Policy 1.12.3. No future land use map amendments or changes shall be approved unless adequate water supplies and associated public facilities are available or will be available to meet projected growth demands.	Yes

Objective 1.13. Public Schools. Objective 1.13 addresses the need for the City to implement standards for the siting of public schools in order to increase the quality of life and local educational opportunities for its citizens.

The policies under Objective 1.13 were reviewed in order to determine their continued relevance and applicability. Table FLU13 below summarizes the results of this review.

TABLE FLU13. FUTURE LAND USE ELEMENT OBJECTIVE 1.13 POLICY REVIEW

Policy	Relevant
Objective 1.13. Public Schools. The City shall implement standards for the siting of public schools to increase the quality of life and local educational opportunities for its citizens.	Yes
Policy 1.13.1. Public school facilities will be permitted within the following future land use categories: Low Density Residential, Medium Density Residential, High Density Residential, Estate Density Residential and Institutional.	This policy should be reviewed to ensure that any new land use designations are taken into account.
Policy 1.13.2. New school sites must not be adjacent to any noxious industrial uses or other property from which noise, vibration, odors, dust, toxic materials, traffic conditions or other disturbances that would have a negative impact.	Yes
Policy 1.13.3. New schools should minimize detrimental impacts on residential neighborhoods, hospitals, nursing homes and similar uses through proper site location, configuration, design layout, access, parking, traffic controls and buffers.	Yes
Policy 1.13.4. The size of new school facilities and land areas should satisfy	Yes

the minimum standards established by the Lake County School Board, whenever possible.	
Policy 1.13.5. Schools shall be located in close proximity to existing or anticipated concentrations of residential development with the exception for high schools and specialized schools which are suitable for other locations due to their special characteristics.	Yes
Policy 1.13.6. New school sites should be well drained and education buildings should be located away from floodplains, wetlands, and other environmentally sensitive lands. Education facilities should not have an adverse impact on historic or archaeological resources.	Yes
Policy 1.13.7. Public utilities, as well as police and fire protection, should be available concurrently with the construction of new school sites.	Yes
Policy 1.13.8. New school sites should have frontage on or direct access to a collector or arterial road and should have suitable ingress and egress for pedestrians, bicycles, cars, buses, service vehicles, and emergency vehicles.	Yes
Policy 1.13.9. To the extent possible, during pre-development program planning and school site selection activities, the City shall coordinate with the Lake County School Board to collocate public facilities, such as parks, libraries, and community centers, with schools.	Yes
Policy 1.13.10. Portions of new schools should be constructed to serve adequately as emergency shelters in case of natural disasters.	Yes
Policy 1.13.11. Schools will be developed consistent with the City's Comprehensive Plan and land development regulations and any mutual agreement between the City and the Lake County School Board.	Yes

HOUSING ELEMENT

Objective 1.1: Housing Supply. Objective 1.1 calls for the City of Leesburg to provide technical and financial assistance to the private sector to provide dwelling units of various types, sizes and costs to meet the affordable housing needs of existing and anticipated populations of the city.

The policies under Objective 1.1 were reviewed in order to determine their continued relevance and applicability. Table H1 below summarizes the results of this review.

TABLE H1. HOUSING ELEMENT OBJECTIVE 1.1 POLICY REVIEW

Policy	Relevant
Objective 1.1. Housing Supply. The City of Leesburg shall provide technical and financial assistance to the private sector to provide dwelling units of various types, sizes and costs to meet the affordable housing needs of existing and anticipated populations of the city.	Yes
Policy 1.1.1. Provide information, technical assistance, and incentives to the private sector to maintain a housing production capacity sufficient to meet the required production.	Yes
Policy 1.1.2. Develop local government partnerships with the private sector to improve the efficiency and expand the capacity of the housing delivery system.	Yes
Policy 1.1.3. Review ordinances, codes, regulations and the permitting process for the purpose of eliminating excessive and overlapping requirements and resolving conflicting requirements, and amending or adding other requirements in order to increase private sector participation in meeting housing needs, while continuing to insure the health, welfare and safety of the residents.	Yes
Policy 1.1.4. Develop land development regulations by 2005 which will, at a minimum, consider alternatives for a housing density bonus system.	This has not yet been achieved.
Policy 1.1.5. The City shall adopt land development regulations that include site selection criteria for the location of housing for the elderly and institutional housing which shall consider accessibility, convenience and infrastructure availability.	This has not yet been achieved.
Policy 1.1.6. The City shall review its development regulations to develop a variety of incentives to allow and encourage housing for very low, low, and moderate income households.	The City has a policy that allows for expedited permitting and deferral of sewer and water impact fees.
Policy 1.1.7. The City shall participate in the SHIP Program with local lending institutions to offer low interest loans to very low, low and moderate income families to rehabilitate and upgrade substandard homes.	The City has been participating in the SHIP program since 2002.

Objective 1.2. Substandard Housing. Objective 1.2 addresses the improvement of substandard housing conditions. It requires the City to develop ongoing programs to eliminate approximately 10 substandard housing units per year.

The policies under Objective 1.2 were reviewed in order to determine their continued relevance and applicability. Table H2 below summarizes the results of this review.

TABLE H2. HOUSING ELEMENT OBJECTIVE 1.2 POLICY REVIEW

Policy	Relevant
Objective 1.2. Substandard Housing. The City of Leesburg shall develop ongoing programs to eliminate approximately 10 substandard housing units per year.	The City should review the figure of 10 units per year to assess whether this is adequate or needs to be amended.
Policy 1.2.1. Increase code compliance and assistance activities through regular annual inspections of the housing stock in neighborhoods where code violations are more prevalent, and in Neighborhood Partnership Program target areas and institute special concentrated code compliance and assistance activities where warranted.	Yes
Policy 1.2.2. Seek federal and state funding, or otherwise provide local public funds for the demolition or rehabilitation of substandard housing.	Yes
Policy 1.2.3. Assist neighborhood upgrading projects city-wide by providing code compliance and assistance, removing blighting influences, and concentrating improvements in such neighborhoods.	Yes

Objective 1.3. Affordable Housing. Objective 1.3 addresses the need for the City shall ensure to ensure that affordable housing for very low, low and moderate income households, including households with special needs, is available to 35% of the new households forecasted by 2010. The objective requires the City to provide affordable housing incentives (such as revised land development regulations, expedited permitting processing, etc.) to developers of affordable housing for the low and very low income groups.

The policies under Objective 1.3 were reviewed in order to determine their continued relevance and applicability. Table H3 below summarizes the results of this review.

TABLE H3. HOUSING ELEMENT OBJECTIVE 1.3 POLICY REVIEW

Policy	Relevant
Objective 1.3. Affordable Housing. The City of Leesburg shall ensure that affordable housing for very low, low and moderate income households, including households with special needs, is available to 35% of the new households forecasted by 2010. These units may be provided by natural filtration, rehabilitation programs, subsidies, new construction or other assistance programs by the private and public sectors. The City shall provide affordable housing incentives (such as revised land development regulations, expedited permitting processing, etc.) to developers of affordable housing for the low and very low income groups (see Policy 1.1.7).	The City has a policy that allows for expedited permitting and deferral of sewer and water impact fees. The objective should be updated to a new date and reviewed to determine if the City wishes to maintain the 35% target or an alternative figure.
Policy 1.3.1. The City of Leesburg shall develop programs for housing for very low, low, and moderate income persons. This assistance will include: technical assistance to locate vacant residential land throughout the City; providing zoning, demographic infrastructure and public facility information; and, technical analysis for meeting the housing criteria.	Yes. The City has developed a 1 st Time Homebuyer Program.
Policy 1.3.2. Distribute publicly assisted housing equitably throughout the City to provide for a wide variety of neighborhood settings for very low, low, and moderate income persons and to avoid undue concentrations in a single neighborhood.	Yes
Policy 1.3.3. Participate with the Orange County Housing Finance Authority in the use of bond funded and state “affordable housing” assistance loans and grants.	Yes. The City participates with Orange County Housing Finance Authority when funds are available and clients qualify.
Policy 1.3.4. Pursue federal sources of funding earmarked for very low, low, and moderate income housing, and encourage allocation of CDBG funds for the rehabilitation of such housing.	Yes. The City was recently awarded \$750k for housing rehab.
Policy 1.3.5. The City shall support and create a “Housing Task Force” comprised of representatives of the City, non-profit housing groups and local lenders and business leaders, to assess, on a regular basis, housing needs and recommend programs that should be instituted to facilitate and implement the City’s housing Goals, Objectives and Policies.	Yes. The City has established a Housing Task Force to create strategies for developing an affordable housing complex.
Policy 1.3.6. The City shall consider the donation of excess City-owned residentially zoned properties and in-fill lots to non-profit organizations that renovate or construct very low and low income households.	Yes
Policy 1.3.7. All residential districts designated by the Future Land Use Map and Zoning Map shall permit development of affordable housing for very low, low and moderate income households, preferably in developments containing units affordable to a range of income groups.	Yes
Policy 1.3.8. The City will investigate providing affordable housing	This has not been undertaken.

density bonuses in the Zoning District regulations by December 31, 2004.	
Policy 1.3.9. The City shall review the feasibility of creating zero-lot-line regulations in certain residential zoning districts.	This has not been undertaken.
Policy 1.3.10. The City shall require Departments to perform an affordable housing impact analysis prior to adoption of any land use or utility ordinances, regulations and comprehensive plan amendments which could adversely affect the cost of affordable housing. The impact analysis shall answer the following questions: <ul style="list-style-type: none"> a. Does the regulation, increase the cost of development (i.e. more landscaping, larger lot sizes, increased fees, require more infrastructure cost up front, etc?) b. Does the regulation, increase the time needed for development approvals? c. Does the regulation, increase the long term cost of development (i.e. increased maintenance or building standards, housing code changes, etc.)? 	City departments do not undertake such an analysis.
Policy 1.3.11. The Community Development Department shall produce a printed inventory of local City-owned lands available for affordable housing to be updated on an annual basis.	This is undertaken by the Housing Department, rather than the Community Development Department. The policy should be amended accordingly.
Policy 1.3.12. The City shall review the street widths and sidewalk requirements and the sidewalk requirements and the landscaping for vehicular use areas requirements to consider reduced requirements for qualified affordable housing projects by December 31, 2004.	The City has not undertaken such an analysis.
Policy 1.3.13. The City will continue to coordinate its affordable housing lending policies with the Lake County Community Services Department to ensure the provision of very low, low, and moderate income housing and continue to help provide this form of housing throughout the City. The City will continue to support various Lake County housing programs and help market them within Leesburg.	Yes. The City works with Lake County to ensure favorable lending policies for very low – moderate income housing. The City also operates its own housing program that is marketing throughout the city.
Policy 1.3.14. The City will coordinate its plans to implement its affordable housing incentives program with the Lake County Community Services Department for their use with the State Housing Initiative Program.	Yes

Objective 1.4. Displacement/Relocation: This objective requires the City to use Housing and Urban Development (HUD) Notice DPC 88-33 guidelines and the Uniform Relocation Assistance and Real Property Acquisition Policy Act of 1970 for displacements, where federal funds are used. The City is also required to implement and enforce the provisions of the City’s Relocation Assistance Plan, where City Funds are used.

The policies under Objective 1.4 were reviewed in order to determine their continued relevance and applicability. Table H4 below summarizes the results of this review.

TABLE H4. HOUSING ELEMENT OBJECTIVE 1.4 POLICY REVIEW

Policy	Relevant
Objective 1.4. Displacement/Relocation: The City shall utilize Housing and Urban Development (HUD) Notice DPC 88-33 guidelines and the Uniform Relocation Assistance and Real Property Acquisition Policy Act of 1970 for displacements, where federal funds are used. The City shall implement and enforce the provisions of the City’s Relocation Assistance Plan, where City Funds are used.	Yes
Policy 1.4.1. Assure that reasonably located, standard housing at affordable costs is available to all persons displaced through public action prior to displacement.	Yes
Policy 1.4.2. The City shall require that very low and low income residents displaced by government action shall have first priority in obtaining public housing.	Yes

Objective 1.5. Historically Significant Housing. Objective 1.5 calls for the preservation and protection of properties on the National Register and locally designated historic properties in accordance with the guidelines provided in the City’s Historic Preservation Ordinance.

The policies under Objective 1.5 were reviewed in order to determine their continued relevance and applicability. Table H5 below summarizes the results of this review.

TABLE H5. HOUSING ELEMENT OBJECTIVE 1.5 POLICY REVIEW

Policy	Relevant
Objective 1.5. Historically Significant Housing. National Register properties and properties designated as locally landmarked in accordance with City Ordinances shall be preserved and protected under the guidelines provided in the City’s Historic Preservation Ordinance.	Yes
Policy 1.5.1. The City shall assist the rehabilitation and adaptive reuse of historically significant housing through technical assistance and economic assistance programs that may become available such as property tax relief, transfer of development rights and below market interest rate loans.	Yes
Policy 1.5.2. The City shall provide technical assistance to property owners of historically significant housing in applying for and utilizing state and federal assistance programs.	Yes
Policy 1.5.3. The City shall provide technical assistance to all citizens initiating applications of historic structures and districts, through the implementation of the City’s Historic Preservation Ordinance which includes criteria for designating properties; standards and guidelines for controlling demolitions, alterations and relocation; and, procedures for administration and enforcement.	Yes
Policy 1.5.4. The City shall provide technical assistance to the Historic Preservation Board’s efforts to provide public information, education and technical assistance relating to historic preservation programs.	Yes

Objective 1.6. Housing Conservation and Rehabilitation. The objective seeks to conserve and extend the useful life of the existing housing stock, and improve the quality of neighborhoods by continued implementation of the Neighborhood Partnership Program, and other programs.

The policies under Objective 1.6 were reviewed in order to determine their continued relevance and applicability. Table H6 below summarizes the results of this review.

TABLE H6. HOUSING ELEMENT OBJECTIVE 1.6 POLICY REVIEW

Policy	Relevant
Objective 1.6. Housing Conservation and Rehabilitation. The useful life of the existing housing stock shall be conserved and extended, and neighborhood quality will be improved by continued implementation of the Neighborhood Partnership Program, and other programs.	The City does not have a Neighborhood Partnership Program but does work with the community and community organizations to conserve and extend the existing housing stock and improve the neighborhoods.
Policy 1.6.1. Review and amend, where necessary, the City housing and health codes and standards relating to the care and maintenance of residential and neighborhood environments and facilities.	Yes
Policy 1.6.2. The City shall continue to schedule and concentrate public infrastructure and supporting infrastructure and supporting facilities and services to upgrade the quality of all existing neighborhoods including those identified in the City Commission approved neighborhood plans and needs studies/assessments.	Yes
Policy 1.6.31 Encourage individual homeowners to increase private reinvestment in housing by providing information on technical and financial assistance programs.	Yes
Policy 1.6.4. The City shall implement the Rental Housing Inspection Program in Neighborhood Partnership (target) areas and other appropriate areas of the City designated by City Commission to maintain housing code compliance.	Yes
Policy 1.6.5. The City shall support the efforts of new Community Housing Development Organizations (CHDOs) and other affordable housing developers in their target areas by providing funding, technical assistance and coordination between City programs and CHDO services.	Yes
Policy 1.6.6. The City shall continue funding the Neighborhood Coordinator or similar type efforts and implement a Neighborhood Partnership Grant Program to upgrade the City's neighborhoods.	The City has not identified funds for a Neighborhood Coordinator or to implement a Neighborhood Partnership Grant Program.
Policy 1.6.7. The City shall actively coordinate the Neighborhood Partnership Program with other initiatives to ensure maximum results in all programs.	The City eliminated the Neighborhood Partnership Program and transferred those responsibilities to the CRAs and the local churches.
Policy 1.6.8. The City shall actively coordinate City Commission approved neighborhood plan recommendations with other initiatives to ensure maximum results in all programs.	Yes
Policy 1.6.9. The City shall continue enforcing the regulations prohibiting the expansion of non-compatible uses and densities within residential neighborhoods.	Yes

Objective 1.7. Housing Non-Discrimination. Objective 1.7 addresses the role of the City, in coordination with Lake County Community Services Department, in assessing public, private non-profit and for profit housing programs, and identifying potential ways to increase access to affordable standard housing for all citizens, regardless of race, sex, age, handicap, ethnic background, marital status, familial composition, or income level. Periodic reports to the City Commission with recommendations for programs and action to combat housing discrimination are cited.

The policies under Objective 1.7 were reviewed in order to determine their continued relevance and applicability. Table H7 below summarizes the results of this review.

TABLE H7. HOUSING ELEMENT OBJECTIVE 1.7 POLICY REVIEW

Policy	Relevant
Objective 1.7. Housing Non-Discrimination. The City's Housing and Economic Development Department, in coordination with Lake County Community Services Department, shall assess existing public, private non-profit and for profit housing programs and identify potential ways to further increase access to affordable standard housing for all citizens, regardless of race, sex, age, handicap, ethnic background, marital status, familial composition, or income level and shall prepare periodic reports to the City Commission with recommendations for programs and action to combat housing discrimination.	Yes. The City has a Fair Housing workshop yearly with the City Commission to request any housing discrimination issues with the public.
Policy 1.7.1. Institute new efforts at informing housing service agencies and the general public regarding fair housing rights and responsibilities.	Yes
Policy 1.7.2. Research the extent of housing discrimination occurring against families with children as a protected class.	Not an activity undertaken by City of Leesburg. Housing Discrimination is a part of Mid Florida Legal Services' portfolio.
Policy 1.7.3. Adhere to state and federal accessibility standards for barrier free multifamily living environments needed by physically handicapped persons.	Yes
Policy 1.7.4. The City shall encourage the private sector to provide additional multifamily living environments needed by physically handicapped persons.	Yes
Policy 1.7.5. The City will continue to notify the Lake County Community Services Department whenever housing discrimination is reported.	Yes

INTERGOVERNMENTAL COORDINATION ELEMENT

Objective 1.1: Coordination of Plans. Objective 1.1 calls for Leesburg’s Growth Management Plan to be consistent with the State Comprehensive Plan, East Central Florida Strategic Regional Policy Plan, Lake County Comprehensive Plan, St. Johns River Water Management District Water Supply Plan, and Comprehensive Plans of adjacent jurisdictions.

The policies under Objective 1.1 were reviewed in order to determine their continued relevance and applicability. Table ICE1 below summarizes the results of this review. Updates to some policies are required as per the approved 10 Year Water Supply Facilities Work Plan, and new policy 1.1.12 to be added.

TABLE ICE1. INTERGOVERNMENTAL COORDINATION ELEMENT OBJECTIVE 1.1 POLICY REVIEW

Policy	Relevant
Objective 1.1. Coordination of Plans. The Leesburg Growth Management Plan shall strive to be consistent with the State Comprehensive Plan, East Central Florida Strategic Regional Policy Plan, Lake County Comprehensive Plan, St. Johns River Water Management District Water Supply Plan, and Comprehensive Plans of adjacent jurisdictions.	Yes
Policy 1.1.1. By 2003, the City Clerk’s office of Leesburg shall compose a comprehensive list detailing all of its interlocal agreements.	A list can be compiled at any time using Clerk’s Indexing System.
Policy 1.1.2. Leesburg shall coordinate with affected governmental agencies when developments, which are presumed to be Developments of Regional Impact, requiring Chapter 380, Florida Statutes, review are within the City’s jurisdiction.	Yes
Policy 1.1.3. The City shall review the Lake County and adjacent city Comprehensive Plans to determine the impact of those adopted plans on the future growth and development of the City of Leesburg. Such review shall occur on an annual basis, and whenever major Plan changes are made by those jurisdictions	Yes
Policy 1.1.4. The City shall participate in the Strategic Regional Policy Plan review and update process as mandated by State Statute.	Yes
Policy 1.1.5. The City of Leesburg shall become an active member in programs and committees administered through the ECFRPC, through representation by both elected officials and City staff.	Yes
Policy 1.1.6. The City of Leesburg shall participate in the development of updates to the St. Johns River Water Management District water supply assessment and regional water supply plan as well as other water supply development-related initiatives facilitated by SJRWMD that affect the City.	Yes
Policy 1.1.7. The City will continue to actively participate in the Lake County Water Alliance meetings and other water supply planning programs offered by the St. Johns River Water Management District.	Yes
Policy 1.1.8. The city will ensure that water supply plans developed by the city are submitted to the St. Johns River Water Management District for their consideration for inclusion into the appropriate regional water supply plan.	Yes
Policy 1.1.9. The City shall coordinate with Lake County and adjacent cities	Yes

<p>through the sharing of relevant planning data and analysis; notification of development occurring within the City; and, review of the impacts, including land use compatibility and level of service standards, of proposed development on adjacent local governments during the City's development review procedures.</p>	
<p>Policy 1.1.10. The City shall provide to affected local governments and agencies, the following information and services:</p> <ul style="list-style-type: none"> ▪ Provide planning data and analysis when requested, ▪ Review the actions of other local governments as to the impact of such action on City service levels and the City's concurrency management system, and ▪ Notification to affected local governments and governmental agencies of pending City actions regarding the provision of services and growth management plan amendments. 	<p style="text-align: center;">Yes</p>
<p>Policy 1.1.11. The City will pursue an interlocal agreement with Lake County by 2003, so that the City and County may identify and establish procedures for joint action regarding future joint planning areas, future annexations and compatible County and City land uses.</p>	<p>The City did pursue an interlocal agreement with Lake County; however, Lake County never adopted it. A new target date will need to be established.</p>

Objective 1.2. Land Use and School Siting Coordination. Objective 1.2 requires the City to coordinate with affected governmental agencies and jurisdictions, including the Lake County School Board, to aid in meeting the goals, objectives, and policies of the City's and their respective Growth Management Plan regarding land use planning and school siting issues.

The policies under Objective 1.2 were reviewed in order to determine their continued relevance and applicability. Table ICE2 below summarizes the results of this review.

TABLE ICE2. INTERGOVERNMENTAL COORDINATION ELEMENT OBJECTIVE 1.2 POLICY REVIEW

Policy	Relevant
Objective 1.2. Land Use and School Siting Coordination. The City shall coordinate with affected governmental agencies and jurisdictions, including the Lake County School Board, to aid in meeting the goals, objectives, and policies of the City's and their respective Growth Management Plan regarding land use planning and school siting issues.	Yes
Policy 1.2.1. Leesburg shall coordinate with the Lake County School Board to provide planning for adequate sites and infrastructure for future public education facilities within the City of Leesburg, through the following activities: <ul style="list-style-type: none"> ▪ On an annual basis, provide planning data and analysis, such as population and housing projections, to aid in the planning efforts of the School Board, ▪ Notify the school board of any City Growth Management Plan land use amendments. 	Yes
Policy 1.2.2. By December 2003, the City of Leesburg shall attempt to enter into an interlocal agreement with the Lake County School Board that will formalize procedures for the inclusion of the City during planning for new school facilities or expansions of existing facilities within the city limits or the utility service area.	New interlocal agreement established.
Policy 1.2.3. During pre-development program planning and school site selection activities, the City shall coordinate with the Lake County School Board to collocate schools with other public facilities, such as parks, libraries and other civic facilities, to the extent possible.	Yes
Policy 1.2.4. Notification of Amendments to Comprehensive Plan and Development Activities. The City shall file a written request to Lake County to receive notification of any proposed land use amendments, changes to adopted levels of service, and all applications for development affecting land adjacent to City boundaries as well as such activities occurring within one mile from the City's limits, within a reasonable time frame for the City to respond with any concerns. The City shall reciprocate such information to Lake County.	Yes

Objective 1.3: Transportation Coordination. Objective 1.3 requires the City to coordinate with affected governmental agencies and jurisdictions to aid in meeting the goals, objectives, and policies of the City's and their respective Comprehensive Plans regarding transportation planning.

The policies under Objective 1.3 were reviewed in order to determine their continued relevance and applicability. Table ICE3 below summarizes the results of this review.

TABLE ICE3. INTERGOVERNMENTAL COORDINATION ELEMENT OBJECTIVE 1.3 POLICY REVIEW

Policy	Relevant
Objective 1.3. Transportation Coordination. The City shall coordinate with affected governmental agencies and jurisdictions to aid in meeting the goals, objectives, and policies of the City's and their respective Comprehensive Plans regarding transportation planning.	Yes
<p>Policy 1.3.1. The City shall coordinate its transportation system with Lake County through an interlocal agreement, which would resolve conflicts and ensures cooperation on the following issues:</p> <ul style="list-style-type: none"> ▪ Assign access permit jurisdiction for roadways within the City limits which are not included in the Florida Department of Transportation Road System Classification list, but which appear in the County's 2020 Transportation Plan. ▪ Initiate procedures to resolve inconsistencies between City desired level of service standards for roadways and County adopted level of service standards. ▪ Provide a method of prioritization and fiscal responsibility and coordination for roadways which impact and serve primarily City residents, but which are under the jurisdiction of Lake County. ▪ Ensure the County's commitment to exercising their right-of-way reservation authority to ensure the adequacy of the future roadway network in and around the City. 	The establishment of the Lake Sumter MPO now provides the forum for transportation coordination with the County, State and other municipalities. The section should be updated to reflect the role of the MPO.

Objective 1.4. Infrastructure Coordination. Objective 1.4 calls for the City to coordinate with affected governmental agencies and jurisdictions to aid in meeting the goals, objectives, and policies of the City's and their respective Comprehensive Plans regarding infrastructure and water supply planning.

The policies under Objective 1.4 were reviewed in order to determine their continued relevance and applicability. Table ICE4 below summarizes the results of this review. Updates and new policies are required as per the approved 10 Year Water Supply Facilities Work Plan.

TABLE ICE4. INTERGOVERNMENTAL COORDINATION ELEMENT OBJECTIVE 1.4 POLICY REVIEW

Policy	Relevant
Objective 1.4. Infrastructure Coordination. The City shall coordinate with affected governmental agencies and jurisdictions to aid in meeting the goals, objectives, and policies of the City's and their respective Comprehensive Plans regarding infrastructure and water supply planning.	Yes
Policy 1.4.1. The City shall continue coordination efforts with Lake County to ensure that the County is able to provide adequate solid waste facilities to meet the needs of the City of Leesburg.	Yes
Policy 1.4.2. The City shall coordinate necessary activities with the plans, programs, and administered legislative actions of the FDEP and Lake County to implement proper operation, storage, and disposal of both solid and hazardous waste.	Yes
<p>Policy 1.4.3. By 2003, the City shall coordinate its Master Drainage Program with Lake County through an interlocal agreement which, when necessary, resolves conflicts and ensures cooperation on the following issues:</p> <ul style="list-style-type: none"> ▪ Determine authority and negotiating capital improvements for drainage outfalls in the County which provide conveyance for stormwater which originates within the City. ▪ When necessary, initiate conflict resolution procedures to resolve inconsistencies between City desired Level of Service standards for drainage and County adopted Level of Service standards. ▪ Provide a method of fiscal responsibility for drainage systems which impact and serve primarily City residents, but which are under the jurisdiction of Lake County. ▪ Provide a method of prioritization of needed improvements on those drainage systems which impact and serve primarily City residents, but which are under the jurisdiction of Lake County or the Florida Department of Transportation. 	This has not been achieved.
Policy 1.4.4. The City shall coordinate with SJRWMD, FDEP, FEMA, DCA, and other appropriate State and Federal Agencies that have jurisdictional authority to ensure that water quality, water supply, stormwater drainage, and flood control measures are consistent with impacts of development.	Yes
Policy 1.4.5. The City will continue to update a 10-year Water Supply Facilities Work Plan in coordination with local governments that identifies potable water supply, infrastructure and facility projects, identify potable water sources, and estimate project costs to serve city utility water supply needs for a 10 year planning period.	Yes
Policy 1.4.6. The City will ensure that the 10-Year Water Supply Facilities Work Plan is prepared in accordance with the SJRWMD regional water supply plans.	Yes
Policy 1.4.7. The City will ensure that the 10-Year Water Supply Facilities Work Plan includes a description of existing water supply facilities and descriptions/locations of projects.	Yes
Policy 1.4.8. The City will ensure that the selection of water supply projects in the 10-Year Water Supply Facilities Work Plan are evaluated based on: imparting a minimal impact to spring and wetland flows/levels; feasibility of cost and operability; and the availability of the water supply resource considering allocations provided to other neighboring utilities and governments.	Yes
Policy 1.4.9. The City will maintain interlocal or franchise agreements with any jurisdictions outside of the City limits in which Leesburg provides water service.	Yes

Policy 1.4.10. The City will maintain interlocal or franchise agreements with any jurisdictions outside of the City limits in which Leesburg provides sewer service.	Yes
Policy 1.4.11. The City shall maintain, revise or establish new agreements for the development of potable water sources and infrastructure as necessary	Yes
Policy 1.4.12. The City shall maintain, revise or establish new agreements for the development of alternative water sources and infrastructure as necessary.	Yes
Policy 1.4.13. The City shall continue to participate in the development of the Coquina Coast Desalination Project and update agreements as necessary	Yes

Objective 1.5. Conservation Coordination. The City shall coordinate with affected governmental agencies and jurisdictions to aid in meeting the goals, objectives, and policies of the City's and their respective Comprehensive Plans regarding conservation issues.

The policies under Objective 1.5 were reviewed in order to determine their continued relevance and applicability. Table ICE5 below summarizes the results of this review.

TABLE ICE5. INTERGOVERNMENTAL COORDINATION ELEMENT OBJECTIVE 1.5 POLICY REVIEW

Policy	Relevant
Objective 1.5. Conservation Coordination. The City shall coordinate with affected governmental agencies and jurisdictions to aid in meeting the goals, objectives, and policies of the City's and their respective Comprehensive Plans regarding conservation issues.	Yes
Policy 1.5.1. The City shall continue coordination with Federal, State, and Regional agencies to ensure adequate technical support for all environmental issues in which the City requires technical expertise.	Yes
Policy 1.5.2. The City shall continue to participate and support programs and projects of State, Regional, and County agencies which seek to preserve environmentally sensitive lands; promote usable open space for all citizens; preserve habitats for endangered species; protect groundwater and potable water supplies; and, surface water quality.	Yes
Policy 1.5.3. Leesburg will coordinate with the ACOE regarding surface water issues.	Yes
Policy 1.5.4. Leesburg will participate in and support programs such as the Surface Water Improvement and Management (SWIM) Program.	Yes
Policy 1.5.5. Leesburg will coordinate with the Lake County Water Authority regarding their respective programs for water quality and quantity.	Yes
Policy 1.5.6. Leesburg will support wellfield protection and water supply planning programs sponsored by the St. Johns River Water Management District.	Yes
Policy 1.5.7. The City shall coordinate with the FFWCC in an effort to address issues relating to fishing, hunting, and other recreational activities and the management, conservation, and protection of fish and wildlife resources and habitat.	Yes

Objective 1.6. Parks and Recreation Coordination. Objective 1.6 calls for the City to coordinate with affected governmental agencies and jurisdictions, including the Lake County School Board, to aid in meeting the goals, objectives, and policies of the City's and their respective Comprehensive Plans regarding parks and recreation planning.

The policies under Objective 1.6 were reviewed in order to determine their continued relevance and applicability. Table ICE6 below summarizes the results of this review.

TABLE ICE6. INTERGOVERNMENTAL COORDINATION ELEMENT OBJECTIVE 1.6 POLICY REVIEW

Policy	Relevant
Objective 1.6. Parks and Recreation Coordination. The City shall coordinate with affected governmental agencies and jurisdictions, including the Lake County School Board, to aid in meeting the goals, objectives, and policies of the City's and their respective Comprehensive Plans regarding parks and recreation planning.	Yes
Policy 1.6.1. Coordinate with Lake County to recommend the provision of adequate acreage on the County's Future Land Use Map for regional, community and neighborhood park lands.	Yes
Policy 1.6.2. Continue to maintain interlocal agreements with the Lake County School Board and Lake County for the provision and maintenance of shared park lands and recreational facilities within the City.	Yes

Objective 1.7. Housing Coordination. Objective 1.7 calls for the City to coordinate with the affected governmental agencies and jurisdictions to aid in meeting the goals, objectives, and policies of the City's and their respective Comprehensive Plans regarding affordable housing.

The policies under Objective 1.7 were reviewed in order to determine their continued relevance and applicability. Table ICE7 below summarizes the results of this review.

TABLE ICE7. INTERGOVERNMENTAL COORDINATION ELEMENT OBJECTIVE 1.7 POLICY REVIEW

Policy	Relevant
Objective 1.7. Housing Coordination. The City shall coordinate with the affected governmental agencies and jurisdictions to aid in meeting the goals, objectives, and policies of the City's and their respective Comprehensive Plans regarding affordable housing.	Yes
Policy 1.7.1. The City will continue to coordinate its affordable housing lending policies with the Lake County Community Services Department to ensure the provision of very low, low, and moderate income housing and continue to help provide this form of housing throughout the City. The City will continue to support various Lake County housing programs and help market them within Leesburg.	Yes. The City works with Lake County to ensure favorable lending policies for very low – moderate income housing. The City also operates its own housing program that is marketing throughout the city.

POTABLE WATER ELEMENT

Objective 1.1 Potable Water Facilities. Objective 1.1 addresses the annual review and adoption of programs and activities to correct existing deficiencies in the potable water system to meet the adopted level of service standard.

The policies under Objective 1.1 were reviewed in order to determine their continued relevance and applicability. Table PW1 below summarizes the results of this review.

TABLE PW1. POTABLE WATER OBJECTIVE 1.1 POLICY REVIEW

Policy	Relevant
Objective 1.1. Potable Water Facilities. Based upon adopted level of service standards, the City shall annually adopt programs and activities to correct existing deficiencies in the central potable water system.	Yes
Policy 1.1.1. The City shall continue to maximize the use of the five potable water treatment facilities, and ultimately strive to incorporate all private systems into the unified city water system.	Yes
Policy 1.1.2. The City's Level of Service for potable water supply shall be 150 gallons per person per day.	Yes
Policy 1.1.3. When evaluating well capacity, the City shall perform pump tests and use hydrogeological field information in the calculation of the system's ability to meet the level of service standard.	Yes
Policy 1.1.4. When evaluating system pump capacity, the City shall use a peak factor of 1.1 GPM per ERC in the calculation of the system's ability to meet the level of service standard.	Yes
Policy 1.1.5. The City's central system parameters shall be based on the following: <ul style="list-style-type: none"> ▪ Well field capacity shall be rated at the average daily demand and assuming the largest well being out of service, ▪ High service pump capacity shall at least be equal to the maximum daily peak factor demand and assuming the largest high service pump being out of service, or have the ability to replace a failed high service pump within 24 hours, and ▪ The distribution system shall be designed for a minimum of thirty-eight (38) pounds per square inch (psi) delivery pressure during normal demand. 	Yes
Policy 1.1.6. The City will maintain its potable water treatment facilities in optimum condition by the implementation of a preventive maintenance program.	The City has implemented a maintenance program. Policy should be revised to indicate continuance of maintenance program.
Policy 1.1.7. The City shall maintain a Water Facilities Work Plan consistent with the City's Consumptive Use Permit and the St. John's River Water	Yes

<p>Management District's (SJRWMD) regional water supply plans for at least a ten-(10) year planning period. The Water Facilities Work Plan (Attachment A) shall be reviewed annually and shall be updated within 18 months of an update to the SJRWMD Water Supply Plan that affects the City or sooner if necessary.</p>	
<p>Policy 1.1.8. The City shall implement the five-year Capital Improvement Schedule for potable water facilities adopted in the Capital Improvements Element and the five-year Capital Improvements Plan updated and adopted annually.</p>	<p>Yes</p>
<p>Policy 1.1.9. The City shall review water fee methodology and user rates annually during the budget process to insure adequate funding for treatment, storage and distribution facilities.</p>	<p>Yes</p>
<p>Policy 1.1.10. The City shall develop a system of review of individual customer water meters to ensure proper readings of those meters.</p>	<p>Yes</p>
<p>Policy 1.1.11. The City shall institute a replacement or "change out" schedule for meters in the field to ensure replacement at least every ten (10) years.</p>	<p>Yes</p>
<p>Policy 1.1.12. All improvements and/or additions to potable water facilities to correct deficiencies shall be compatible and adequate to meet the adopted level of service standards. These improvements and/or additions to Potable Water facilities shall comply, at a minimum, with standards recognized and approved by the Florida Department of Environmental Protection, specifically including the American Society of Civil Engineers and the American Water Works Association.</p>	<p>Yes</p>

Objective 1.2. Future Potable Water Facilities. Objective 1.2 addresses the provision of potable water to meet future demand.

The policies under Objective 1.2 were reviewed in order to determine their continued relevance and applicability. Table PW2 below summarizes the results of this review.

TABLE PW2. POTABLE WATER OBJECTIVE 1.2 POLICY REVIEW

Policy	Relevant
Objective 1.2. Future Potable Water Facilities. Based upon population projections, the City shall ensure the supply and treatment of safe potable water through the 20-year planning horizon to meet the adopted level of service standards to existing and future development in accordance with the five-year Capital Improvements Program and consistent with the Saint Johns River Water Management District's (SJRWMD's) regional water supply plans, the city's 10-Year Water Facilities Work Plan, Consumptive Use Permit and the city's Future Land Use Element.	Yes
Policy 1.2.1. Based upon the adopted level of service the City shall plan for replacement, expansion and extension of potable water facilities to meet future demands concurrent with new development.	Yes
Policy 1.2.2. The City shall plan for adequate future treatment facilities, which at a minimum will meet all Federal and State drinking water criteria.	Yes
Policy 1.2.3. The City shall implement the capital improvement schedule for potable water facilities adopted in the Capital Improvements Element and the annual Capital Improvements Plan.	Yes
Policy 1.2.4. The City shall review the Capital Improvement Schedule annually and adopt a City Budget that prioritizes needed potable water improvements to meet the demands of future growth and approved developments.	Yes
Policy 1.2.5. The City will ensure that all facilities identified as being needed in the first five years of 10-year work plan planning period be adopted as a revision to the city's 5-year Capital Improvements Plan.	Yes
Policy 1.2.6. The City shall prepare a 10-year Water Supply Facilities Work Plan in coordination with local governments that identifies potable water supply, infrastructure and facility projects, identify potable water sources, and estimate project costs for a 10 year planning period.	Yes
Policy 1.2.7. The City shall ensure that the 10-year Water Supply Facilities Work Plan is prepared in accordance with the SJRWMD regional water supply plans and Consumptive Use Permit.	Yes
Policy 1.2.8. The city shall identify all additional potable water supply sources, infrastructure and facilities (and associated projects/costs) to provide adequate services to future development consistent with the Future Land Use Element and meet water supply demands for a 10-year planning period in the prepared 10-year Water Supply Facilities Work Plan.	Yes
Policy 1.2.9. The City shall ensure that the 10-year Water Supply Facilities Work Plan includes a description of existing water supply facilities and descriptions/locations of projects.	Yes
Policy 1.2.10. The City shall ensure that the selection of water supply projects in the 10-year Water Supply Facilities Work Plan are evaluated based on: imparting a minimal impact to spring and wetland flows/levels; feasibility of cost and operability; and the availability of the water supply resource considering allocations provided to other neighboring utilities/governments.	Yes
Policy 1.2.11. The City shall ensure that the 10-year Water Supply Facilities Work Plan includes service area and water supply demand projections for a 10-year planning period.	Yes

<p>Policy 1.2.12. The City shall ensure that the 10-year Water Supply Facilities Work Plan includes all relevant design projections to meet stated water supply needs, including anticipated facility permitting and construction dates, estimated facility construction costs, and fund sources.</p>	<p>Yes</p>
<p>Policy 1.2.13. The city shall make appropriate changes to the city's Comprehensive Plan's Conservation Element, Intergovernmental Coordination Element, Capital Improvements Element, Future Land Use Element, Potable Water Element, and appropriate sections of utility elements (i.e., the Sanitary Sewer, Stormwater Management elements) as necessary to support implementation of the 10-year Water Supply Facilities Work Plan goals, objectives and projects.</p>	<p>Yes</p>

Objective 1.3 Potable Water Service Area. Objective 1.3 calls for discouraging urban sprawl by maximizing the use of existing potable water facilities.

The policies under Objective 1.3 were reviewed in order to determine their continued relevance and applicability. Table PW3 below summarizes the results of this review.

TABLE PW3. POTABLE WATER OBJECTIVE 1.3 POLICY REVIEW

Policy	Relevant
Objective 1.3. Potable Water Service Area. The City shall strive to provide potable water service to all development within its service areas and shall discourage leapfrog development and urban sprawl.	Yes
Policy 1.3.1. The City shall be the provider of potable water to residents and non-residential establishments within the City's service area.	Yes
Policy 1.3.2. The City shall not approve private wells for potable water use when City potable water facilities are available. When not available, the City may authorize the use of private wells for potable and non-potable purposes by the customer. Any and all alternative uses of private wells must be approved by the City of Leesburg Environmental Services Department.	Yes
<p>Policy 1.3.3. At such time as the City's potable water facilities become available to a customer residing in the City limits, said customer:</p> <ul style="list-style-type: none"> ▪ Must connect to the City water system for potable and irrigation water purposes and ensure that all connections to City water meters have a City approved backflow prevention device properly installed (within the first 12-inches of the customer side of all City water meters) and maintained/tested by the property owner upon installation and yearly thereafter; ▪ May use existing active wells for agricultural and livestock support purposes, provided that a City approved backflow prevention device is properly installed (within the first 12-inches of the customer side of all City water meters) and maintained/tested by the property owner upon installation and yearly thereafter; and ▪ Must properly abandon all inactive wells: an inactive well is defined as any well that has not been in use for six (6) or more months. 	Yes
Policy 1.3.4. Potable water facilities shall be considered "available" when they exist within 200 feet of a property. Costs associated with connection to the City's facilities shall be the responsibility of the owner and not the City of Leesburg.	Yes
<p>Policy 1.3.5. The City shall discourage urban sprawl through the following activities:</p> <p>Require that all new developments within the City's service area connect to the City's existing centralized water supply/treatment facilities and utilize stormwater and reclaimed water for all irrigation needs, if available;</p> <p>The City shall only provide service to those areas included in the City's delineated Service area;</p> <p>The City shall not allow new development in the Service area to utilize individual private wells for water service; and,</p> <p>When reviewing applications for development orders within the City limits, the City shall consider impact on the environment, including the ability to be served by the City's existing water facilities.</p>	Yes

Objective 1.4. Potable Water Conservation. Objective 1.4 calls for conserving potable water resources by ensuring that the per capita consumption rate does not exceed 37.5 gallons per person per day.

The policies under Objective 1.4 were reviewed in order to determine their continued relevance and applicability. Table PW4 below summarizes the results of this review.

TABLE PW4. POTABLE WATER OBJECTIVE 1.4 POLICY REVIEW

Policy	Relevant
Objective 1.4. Potable Water Conservation. The City shall maintain initiatives to conserve potable water resources, which ensure that existing level of service standards for potable water do not fluctuate higher than 37.5 gallons per person per day.	Yes
Policy 1.4.1. The City shall maintain a progressive water rate structure to ensure conservation of potable water.	Yes
Policy 1.4.2. The City shall maintain the reclaimed wastewater effluent program whereby wastewater is treated to standards consistent with Florida Department of Environmental Protection (FDEP) requirements for “unrestricted public access” irrigation of private and public areas, so that potable water is not used for irrigation in areas where reclaimed water is available.	Yes
Policy 1.4.3. By 2004, the City shall develop and maintain a reclaimed water master plan for use in planning expansions to the existing reclaimed water system.	Yes – revise date
Policy 1.4.4. The City shall implement the five-year capital improvement schedule for reclaimed water facilities adopted in the Capital Improvements Element, as well as the annual Capital Improvement Plan.	Yes
Policy 1.4.5. The SJRWMD has the exclusive authority to regulate consumptive uses of water under Chapter 373., F.S. The City shall have the authority to ensure for the efficient operation of the reclaimed water system or for the health or safety of the general public or the customer, regarding the following matters: <ul style="list-style-type: none"> ▪ The times of day or night during which the reclaimed water may be used by customers. ▪ The maximum rate of use of the reclaimed water. ▪ The right to inspect reclaimed water devices, facilities, and terminate service to reclaimed water system found to be in violation of any city ordinance, regulation or procedure. ▪ The right to impose the requirement that upon being connected to the city's reclaimed water system, any existing wells on the subject property shall not continue to be used for irrigation and shall be disconnected from the irrigation system (unless otherwise approved by the cognizant permitting agency and the city manager). ▪ The right to impose the mandatory payment of fees for the installation and usage of reclaimed water systems. Once service is connected, the user shall pay a minimum monthly charge set by resolution of the city commission. ▪ The right to temporarily discontinue service to any portion of, or the entire, reclaimed water system as deemed necessary by the city. 	Yes
Policy 1.4.6. The City shall require that all new developments which contain or abut existing or planned future extensions of the City's reclaimed water distribution system connect to the reclaimed water system for residential, commercial and common area irrigation uses, at the developer's expense, when available.	Yes
Policy 1.4.7. The City shall require the installation of EPA Water Sense certified plumbing devices including ultra-low flow toilets, shower heads and faucets for new construction and within new developments.	Yes
Policy 1.4.8: The City shall adhere to St. Johns River Water Management District emergency water shortage restrictions when mandated by the District.	Yes
Policy 1.4.9. The City shall conduct annual water audits on per capita potable water consumption to determine if consumption is being reduced and adjust the city's water use rate structure accordingly to maintain per capita consumption at or below previous levels.	Yes

Objective 2.1 Fire Protection. Objective 2.1 addresses the provision of fire protection at needed gallon per minute flows.

The policies under Objective 2.1 were reviewed in order to determine their continued relevance and applicability. Table PW5 below summarizes the results of this review.

TABLE PW5. POTABLE WATER OBJECTIVE 2.1 POLICY REVIEW

Policy	Relevant
Objective 2.1. Fire Protection. The City shall monitor, evaluate, repair and replace, as needed, the existing water delivery and distribution system facilities identified in the 10-year Water Supply Facilities Work Plan to ensure the system can deliver, by 2005, needed gallon per minute flows to meet fire protection demands.	Yes , update dates
Policy 2.1.1: The City shall maintain an active water system and fire hydrant mapping and numbering program.	Yes
Policy 2.1.2. The City of Leesburg Environmental Services Department shall continue to conduct fire flow testing of hydrants to ensure adequate system capacity.	Yes
Policy 2.1.3. The City shall extend water distribution mains to areas within the City's service area and provide adequate fire protection service to residents and non-residential establishments located within the service area provided the residents/developers participate in the costs.	Yes
Policy 2.1.4. Fire flow levels of service shall be based upon delivery of 500 GPM for residential and 1000 GPM for multi-family and commercial developments with a required residual pressure of twenty (20) psi. developments with a required residual pressure of twenty (20) psi.	Yes

PUBLIC SCHOOL FACILITIES ELEMENT

Objective 1.1. Level of Service (LOS) standards shall be adopted in order to ensure that there is sufficient school capacity to support student growth for each year of the five-year planning period and for the long term planning horizon.

The policies under Objective 1.1 were reviewed in order to determine their continued relevance and applicability. Table PS1 below summarizes the results of this review.

TABLE PS1. PUBLIC SCHOOLS FACILITIES ELEMENT OBJECTIVE 1.1 POLICY REVIEW

Policy	Relevant
Objective 1.1. Level of Service (LOS) standards shall be adopted in order to ensure that there is sufficient school capacity to support student growth for each year of the five-year planning period and for the long term planning horizon.	Yes
Policy 1.1a. The LOS is defined as school enrollment as a percentage of school student capacity based upon the Florida Inventory of School Houses (FISH). The LOS standard is the maximum level of school utilization that will be permitted in the Lake County School District. The LOS for all schools shall be set at 100% of FISH permanent capacity. In instances where the CORE (dining) capacity is greater than the FISH permanent capacity, the school capacity shall then be increased to that of the CORE (dining) capacity and the level of service maintained at 100% of the school capacity. In no instance shall the school capacity increase more than 125% due to additional CORE (dining) capacity.	Yes
Policy 1.1b. The adopted LOS standard shall become applicable to the City no later than December 1, 2008.	Yes
Policy 1.1c. Individual schools are discouraged from operating in excess of the established LOS. Moreover, the issuance of development orders and building permits shall be strictly conditioned upon the availability of school capacity and the maintenance of the adopted LOS.	Yes
Policy 1.1d. The LOS standards will be used to determine whether sufficient school capacity exists to accommodate future development projects, and evaluate the sufficiency of the Five-Year Schedule of Capital Improvements. The Five-year Schedule of Capital Improvements shall be reviewed, updated, and adopted annually thus ensuring those projects necessary to address existing deficiencies, and to meet future needs based upon our adopted level of service standards, are adequately planned for. Furthermore, coordination with the Lake County School Board’s Five Year District Facilities Work Plan, the plans of other local governments, and as necessary, updates to the Concurrency Service Area map is required to ensure that the adopted Level of Service Standards for Concurrency Service Areas will be achieved and maintained.	Yes
Policy 1.1e. In coordination with Section 5.3 of the Interlocal Agreement between Lake County, Lake County School Board and Municipalities for School Facilities Planning and Siting, future amendments to the Concurrency Service Areas (CSA’s) may be accomplished by the School Board only after review and comment by the County and other municipalities within Lake County as provided in Section 5.1.1 of the Interlocal Agreement. Amendments to the CSA’s shall be established to maximize available school capacity, taking into account transportation costs, desegregation plans, diversity policies, and the extent to which development approvals have been issued by a local government based on the availability of school capacity in a CSA contiguous to the CSA in which the development approval was issued. Amendments to the CSA’s and attendance zones shall be designed to make efficient use of new and existing public school facilities in accordance with the Level of Service Standards set forth in the Interlocal Agreement.	Yes

Objective 1.2. Ensure that comprehensive plan amendments and other land use decisions are simultaneously evaluated with school capacity availability within the City.

The policies under Objective 1.2 were reviewed in order to determine their continued relevance and applicability. Table PS2 below summarizes the results of this review.

TABLE PS2. PUBLIC SCHOOLS FACILITIES ELEMENT OBJECTIVE 1.2 POLICY REVIEW

Policy	Relevant
Objective 1.2. Ensure that comprehensive plan amendments and other land use decisions are simultaneously evaluated with school capacity availability within the City.	Yes
Policy 1.2a. School Board findings and comments on the availability of adequate school capacity shall be considered when evaluating the decision to approve comprehensive plan amendments and other land use decisions as provided for in s. 163.3177 (6)(a), F.S.	Yes
Policy 1.2b. The School Board shall review potential new development student generation impacts and available school capacity. Where capacity will not be available to serve students from the property seeking development approval and proportionate share mitigation is not an option, the School Board shall not issue a favorable concurrency determination. The City may use lack of school capacity demonstrated by an unfavorable concurrency determination as a reason for denial.	Yes

Objective 1.3. Ensure that the planning and construction of educational facilities are coordinated so that the timing is proper, the selected location is compatible with the surrounding area, the construction is concurrent with necessary services and infrastructure and the proposal is consistent with the comprehensive plan.

The policies under Objective 1.3 were reviewed in order to determine their continued relevance and applicability. Table PS3 below summarizes the results of this review.

TABLE PS3. PUBLIC SCHOOLS FACILITIES ELEMENT OBJECTIVE 1.3 POLICY REVIEW

Policy	Relevant
Objective 1.3. Ensure that the planning and construction of educational facilities are coordinated so that the timing is proper, the selected location is compatible with the surrounding area, the construction is concurrent with necessary services and infrastructure and the proposal is consistent with the comprehensive plan.	Yes
Policy 1.3a. The City shall coordinate with the School Board so that proposed public school facility sites are consistent with the applicable land use designations and policies of the comprehensive plan. Pursuant to Section 235.193, F.S., the City will consider each site plan as it relates to environmental concerns, health, safety and welfare, and effects on adjacent property. In addition, road capacity and traffic concerns will also be evaluated. The City will also continue to pursue the development of mutually acceptable guidelines for the selection of future school sites including, but not limited to: <ul style="list-style-type: none"> ▪ Acquisition of school sites which allow for future expansions to accommodate future enrollment and other facility needs deemed beneficial for joint-uses, as identified by the Lake County School Board and the City; ▪ Coordination of the location, phasing, and development of future school sites to ensure that site development occurs in conjunction with the provision of required infrastructure to serve the school facility; ▪ Preferences for urban and urbanizing areas; and ▪ Provide for allowances for rural sites as deemed necessary and appropriate under certain circumstances. 	Yes
Policy 1.3b. The City shall coordinate with the School District to evaluate and locate potential sites where the co-location of schools with other public facilities, such as parks, libraries, and community centers can be selected.	Yes

Objective 1.4. Enhance community design through effective school facility design and siting standards. Encourage the siting of school facilities so that they are compatible with the surrounding land use.

The policies under Objective 1.4 were reviewed in order to determine their continued relevance and applicability. Table PS4 below summarizes the results of this review.

TABLE PS4. PUBLIC SCHOOLS FACILITIES ELEMENT OBJECTIVE 1.4 POLICY REVIEW

Policy	Relevant
Objective 1.4. Enhance community design through effective school facility design and siting standards. Encourage the siting of school facilities so that they are compatible with the surrounding land use.	Yes
Policy 1.4a. The City shall closely coordinate with the School Board in order to provide consistency between the City's comprehensive plan and public school facilities programs, such as: <ul style="list-style-type: none"> ▪ Greater efficiency for the School Board and the City by locating schools to take advantage of existing and planned roads, water, sewer, parks, and drainage systems; ▪ Improved student access and safety by coordinating the construction of new and expanded schools and sidewalk construction programs; ▪ The location and design of schools with parks, ball fields, libraries, and other community facilities to take advantage of shared use opportunities; ▪ The expansion and rehabilitation of existing schools to support neighborhoods. 	Yes
Policy 1.4b. Local governments and the school district shall coordinate emergency preparedness issues including, but not limited to, the use of school facilities as public shelters during emergencies.	Yes
Policy 1.4c. Public schools shall provide bicycle and pedestrian access consistent with Florida Statutes. Bicycle access and trails to public schools should be incorporated in trail projects and programs that are currently scheduled by the City and County. Parking and sidewalks at public schools will be provided consistent with the comprehensive plan.	Yes
Policy 1.4d. Schools shall be designed consistent with the comprehensive plan. Land uses in which schools will be an allowable use will be directed by the City's comprehensive plan and any subsequent zoning and land development codes must be consistent with the comprehensive plan.	Yes

Objective 2.1. Establish capacity determination standards.

The policies under Objective 2.1 were reviewed in order to determine their continued relevance and applicability. Table PS5 below summarizes the results of this review.

TABLE PS5. PUBLIC SCHOOLS FACILITIES ELEMENT OBJECTIVE 2.1 POLICY REVIEW

Policy	Relevant
Objective 2.1. Establish capacity determination standards.	Yes
Policy 2.1a: The School Board shall determine whether adequate school capacity exists for a proposed development based on LOS standards.	Yes
Policy 2.2a. The School District shall conduct a concurrency review that includes findings and recommendations of whether there is adequate school capacity to accommodate the proposed development for each type of school within the City consistent with the LOS standard. The School District shall issue a concurrency determination based on the findings and recommendations.	Yes

Objective 2.2. Establish availability standards.

The policies under Objective 2.2 were reviewed in order to determine their continued relevance and applicability. Table PS6 below summarizes the results of this review.

TABLE PS6. PUBLIC SCHOOLS FACILITIES ELEMENT OBJECTIVE 2.2 POLICY REVIEW

Policy	Relevant
Objective 2.2. Establish availability standards.	Yes
<p>Policy 2.2a. The City shall not deny a subdivision plat or site plan for the failure to achieve and maintain the adopted level of service for public school capacity where:</p> <ol style="list-style-type: none"> <li data-bbox="240 646 1308 739">1. Adequate school facilities will be in place or under construction within three (3) years after the issuance of the subdivision plat or site plan according to the School Boards 5 year Capital Improvement Plan at the time of approval; <li data-bbox="240 772 1308 835">2. Adequate school facilities are available and the capacity impacts of development can be satisfied by utilizing available capacity in an adjacent Concurrency Service Area or; <li data-bbox="240 869 1308 961">3. The developer executes a legally binding commitment to provide mitigation proportionate to the demand for public school facilities to be created by the actual development of the property subject to the final plat or site plan. 	Yes
<p>Policy 2.2b. If the School District determines that adequate capacity will not be in place or under construction within three (3) years after the issuance of final subdivision or site plan approval according to the Lake County School Boards 5 year Capital Improvement Plan at the time of approval and mitigation is not an acceptable alternative, the School District shall issue a School Concurrency Determination stating that capacity is not available. If the School District determines that adequate capacity does not exist, but mitigation, through proportionate share mitigation is an option, the development will remain active pending the conclusion of mitigation negotiations.</p>	Yes

Objective 2.3. Establish proportionate share mitigation alternatives which are financially feasible and will achieve and maintain the adopted level of service standard consistent with the adopted School Board’s financially feasible Capital Improvement Plan.

The policies under Objective 2.3 were reviewed in order to determine their continued relevance and applicability. Table PS7 below summarizes the results of this review.

TABLE PS7. PUBLIC SCHOOLS FACILITIES ELEMENT OBJECTIVE 2.3 POLICY REVIEW

Policy	Relevant
Objective 2.3. Establish proportionate share mitigation alternatives which are financially feasible and will achieve and maintain the adopted level of service standard consistent with the adopted School Board’s financially feasible Capital Improvement Plan.	Yes
<p>Policy 2.3a. In the event that mitigation is an acceptable alternative to offset the impacts of a proposed development, where the adopted LOS standards would otherwise be exceeded, the following options listed below, for which the School District assumes operational responsibility through incorporation in the adopted School Board’s financially feasible Capital Improvements Program and which will maintain the adopted LOS standards, shall include but not limited to:</p> <ol style="list-style-type: none"> 1. The donation, construction, or funding of school facilities created by the proposed development. 2. The creation of mitigation banking based on the construction of a public school facility in exchange for the right to sell capacity credits. 	Yes
Policy 2.3b. Proposed mitigation shall be directed toward a permanent capacity improvement identified in the School Board’s financially feasible 5-Year Capital Improvement Program. Consideration may be given by the School Board to place an additional improvement required for mitigation on its Capital Improvement Program. The proposed mitigation must satisfy the demand created by the proposed development consistent with the adopted LOS standards or identified as an amendment to the adopted Capital Improvement Program. Portable classrooms will not be accepted as mitigation.	Yes
Policy 2.3c. Mitigation shall be directed to projects on the School Board’s financially feasible Capital Improvement Program that the School Board agrees will satisfy the demand created by that development approval, and shall be assured by a legally binding development agreement between the School Board, the relevant local government, and the applicant executed prior to the issuance of the subdivision plat, site plan, or functional equivalent. If the school agrees to the mitigation, the School Board must commit in the agreement to placing the improvement required for mitigation on its Capital Improvement Program. This development agreement shall include landowner’s commitment to continuing renewal of the development agreement upon its expiration.	Yes
<p>Policy 2.4b. The applicant’s total proportionate-share mitigation obligation to resolve a capacity deficiency shall be based on the following formula, for each school level: multiply the number of new student stations required to serve the new development by the average cost per student station. The average cost per student station shall include school facility development costs and land costs. The applicant’s proportionate-share mitigation obligation will be credited toward any other impact fee or exaction imposed by local ordinance for the same need, on a dollar-for-dollar basis, at fair market value. The process to determine proportionate share mitigation obligation shall be as follows:</p> <p>Step 1: Determine the number of students to be generated by the development</p> <p>Number of Dwelling Units in the proposed development (by unit type) MULTIPLIED BY</p>	Yes

<p>Student Generation Rate (by type of DU and by School Type) EQUALS Number Students Stations needed to serve the proposed development</p> <p>Step 2: Comparing the available capacity to the number of student stations calculated in Step 1 to assess the need for mitigation</p> <p>Available Capacity MINUS The Number of new Students Stations needed to accommodate the proposed development EQUALS The shortfall (negative number) or surplus (positive number) of capacity to serve the development</p> <p>Step 3: Evaluating the available capacity in contiguous service areas</p> <p>If Step 2 results in a negative number, repeat that step for one or more contiguous service areas. If this step results in a negative number, then proceed to step 4 to calculate the proportionate share mitigation.</p> <p>Step 4: Calculating proportionate share mitigation</p> <p>Needed additional Student Stations from Step 3 MULTIPLIED BY Average cost per Student Station EQUALS Proportionate-Share Mitigation Obligation</p>	
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Objective 2.4. The student generation rates used to determine the impact of a particular development application on public schools shall be consistent with Lake County School Board and Florida Department of Education Standards. The student generation rates shall be reviewed and updated every two (2) years in accordance with professionally accepted methodologies.

There are no policies under Objective 2.4 so only the objective was reviewed in order to determine its continued relevance and applicability. Table PS8 below summarizes the results of this review.

TABLE PS8. PUBLIC SCHOOLS FACILITIES ELEMENT OBJECTIVE 2.4 REVIEW

Policy	Relevant
Objective 2.4. The student generation rates used to determine the impact of a particular development application on public schools shall be consistent with Lake County School Board and Florida Department of Education Standards. The student generation rates shall be reviewed and updated every two (2) years in accordance with professionally accepted methodologies.	Yes

RECREATION AND OPEN SPACE ELEMENT

Objective 1.1. Levels of Service. Recreation and Open Space objective 1.1 is provided to ensure that adequate lands are provided for public parks, through the utilization of level of service standards and other criteria specific to population, park size and location. The objective allows for parklands under the jurisdiction of Lake County to be utilized for the purposes of implementing this Objective.

The policies under Objective 1.1 were reviewed in order to determine their continued relevance and applicability. Table ROS1 below summarizes the results of this review.

TABLE ROS1. RECREATION & OPEN SPACE ELEMENT OBJECTIVE 1.1 POLICY REVIEW

Policy	Relevant
Objective 1.1. Levels of Service. To ensure adequate lands are provided for public parks, the City shall utilize level of service standards and other criteria specific to population, park size and location. For purposes of implementing this Objective, the City may utilize parklands under the jurisdiction of Lake County.	Yes
Policy 1.1.1. The level of service (LOS) standard for parks shall be as follows: Overall Park Land: Six (6) acres per 1,000 residents. This standard includes both passive and active developed open space. Community Parks: Three (3) acres per 1000 residents Neighborhood Parks: Two (2) acres per 1,000 residents.	Yes
Policy 1.1.2. The City of Leesburg shall utilize the following criteria for determining the location and need for park lands: - Community Park - A facility designed to serve the needs of more than one neighborhood. This facility type shall serve a minimum of 8,000 City residents and is located no greater than three (3) miles from those residents. The minimum size of any new community parks shall be five (5) acres. Neighborhood Park - A facility that serves an entire neighborhood or area with a minimum of 2,000 City residents and is located no greater than three-fourths (3/4) of a mile from those residents. The minimum size of a neighborhood park shall be two (2) acres. - Mini Park – A small park serving a concentrated or limited population of 500 to 1,000 residents within a radius of ¼ mile. A minimum size of one half (1/2) acre for each stand-alone park is recommended.	Yes
Policy 1.1.3. The City shall incorporate the following definitions within it's Land Development Regulations: - Active Park – Those park areas that are relatively free of man-made structural mass, and are utilized for active recreational pursuits. - Passive Park – Those parks that are free of man-made structural mass, and are utilized primarily for passive recreational pursuits. - Activity-Based Recreation Facilities – Facilities designed for specific recreational purposes, such as man-made pools for swimming, courts for tennis, racquetball, basketball, etc. - Resource-Based Recreation Facilities – Facilities dependent on natural resources such as water for boating, forests for hunting, etc.	These definitions have not yet been incorporated in the Land Development Code. A new target date should be established.
Policy 1.1.4. The City shall maintain standards for park development and improvements. Standards including buffering, landscaping, parking, and the amount of area available for facilities shall be included in the Code of Ordinances by	As standards have been adopted, the policy should be amended accordingly.

2003.																										
<p>Policy 1.1.5 The City shall use the following guidelines for the provision of recreation facilities:</p> <table border="1"> <thead> <tr> <th>Facility</th> <th>Guidelines per Population</th> </tr> </thead> <tbody> <tr> <td>Baseball/Softball Fields</td> <td>1:2,000</td> </tr> <tr> <td>Basketball Courts</td> <td>1:3,500</td> </tr> <tr> <td>Boat Ramps</td> <td>1:3,000</td> </tr> <tr> <td>Community Centers (Rooms)</td> <td>1:2,000</td> </tr> <tr> <td>Football/Soccer Fields</td> <td>1:4,000</td> </tr> <tr> <td>Handball/Racquetball Courts</td> <td>1:3,500</td> </tr> <tr> <td>Playgrounds</td> <td>1:2,500</td> </tr> <tr> <td>Shuffleboard Courts</td> <td>1:800</td> </tr> <tr> <td>Tennis Courts</td> <td>1:2,000</td> </tr> <tr> <td>Swimming Pools</td> <td>1:10,000</td> </tr> <tr> <td>Trails</td> <td>mile:2,000</td> </tr> </tbody> </table>		Facility	Guidelines per Population	Baseball/Softball Fields	1:2,000	Basketball Courts	1:3,500	Boat Ramps	1:3,000	Community Centers (Rooms)	1:2,000	Football/Soccer Fields	1:4,000	Handball/Racquetball Courts	1:3,500	Playgrounds	1:2,500	Shuffleboard Courts	1:800	Tennis Courts	1:2,000	Swimming Pools	1:10,000	Trails	mile:2,000	Yes
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<p>Policy 1.1.6. Currently, Lake County does not provide organized recreation services; therefore, these services are provided by the individual cities within the County. By 2004, the City of Leesburg shall conduct a study to provide an analysis based on existing facility usage to determine if there is a steady growth in facility users that is more consistent with the population growth in the County compared to the City.</p>		<p>A Recreation Impact Fee Study was done in June 2004 that took into account these factors. Policy needs to be updated.</p>																								

Objective 1.2. Natural Resources. Objective 1.2 provides for the maintenance of a comprehensive park and open space system, which utilizes existing resources and is consistent with the land and financial resources available.

The policies under Objective 1.2 were reviewed in order to determine their continued relevance and applicability. Table ROS2 below summarizes the results of this review.

TABLE ROS2. RECREATION & OPEN SPACE ELEMENT OBJECTIVE 1.2 POLICY REVIEW

Policy	Relevant
Objective 1.2. Natural Resources. Maintain a comprehensive park and open space system to ensure the provision of open space, which utilizes existing resources and is consistent with the land and financial resources available.	Yes
Policy 1.2.1. By 2004, the City shall investigate opportunities for public access and enjoyment of the waterfront; improved bike, pedestrian and equestrian trail systems; as well as open space opportunities.	These opportunities were investigated as part of a PD & E study performed in 2006 and the FCT grant whereby the City was able to purchase abandoned CSX railroad beds for future development into trails. Thus far several trailways have been developed, and staff is constantly seeking grant funding opportunities to further this endeavor. Policy needs to be updated.
Policy 1.2.2. The City shall continue to maintain ecologically sensitive wetland areas as open space areas to be protected and enjoyed by the community.	Yes
Policy 1.2.3. Ecologically sensitive lands shall be left in their natural state and considered as part of the City's passive recreation and open space system. Programs to implement this policy shall incorporate the designation of ecologically sensitive areas, where little or no development is permitted, as open space areas.	Yes
Policy 1.2.4. The City shall continue to protect the recreational value of its water resources and participate in programs to improve water quality.	Yes
Policy 1.2.5. As part of the annexation process, the City shall identify and designate ecologically sensitive wetland areas as open space areas.	Yes
Policy 1.2.6. The City of Leesburg will remove non-native vegetation located in recreation and conservation land owned by the City consistent with funding availability and financial planning defined in the Capital Improvement Plan.	Yes
Policy 1.2.7. The City of Leesburg will restore or enhance degraded natural areas in recreation and conservation land owned by the City consistent with funding availability and financial planning defined in the Capital Improvement Plan.	Yes

Objective 1.3. Capital Improvements. Objective 1.3 provides for an ongoing (annual) assessment of park and recreational facility needs and land to meet the demands of future growth based on established levels of service.

The policies under Objective 1.3 were reviewed in order to determine their continued relevance and applicability. Table ROS3 below summarizes the results of this review.

TABLE ROS3. RECREATION & OPEN SPACE ELEMENT OBJECTIVE 1.3 POLICY REVIEW

Policy	Relevant
Objective 1.3. Capital Improvements. On an annual basis, the City shall assess needs and propose capital improvements to provide adequate park and recreational facilities and land to meet the demands of future growth, based on established levels of service.	Yes
Policy 1.3.1. The City shall review park and recreation level of service standards, on an annual basis, in order to maintain adequate facilities based on population.	Yes
Policy 1.3.2. The City shall correct or improve existing recreation and open space deficiencies.	Yes
Policy 1.3.3. The City shall evaluate recreational need for newly annexed areas.	Yes
Policy 1.3.4. The Capital Improvements Element shall designate facilities needed to meet future demands according to the designated level of service standards.	Yes

Objective 1.4. Coordination Efforts. Objective 1.4 calls for the City to continue to coordinate with Lake County, the Lake County School Board, and other entities to share recreational functions.

The policies under Objective 1.4 were reviewed in order to determine their continued relevance and applicability. Table ROS4 below summarizes the results of this review.

TABLE ROS4. RECREATION & OPEN SPACE ELEMENT OBJECTIVE 1.4 POLICY REVIEW

Policy	Relevant
Objective 1.4. Coordination Efforts. The City shall continue to coordinate with Lake County, the Lake County School Board, and other entities to share recreational functions.	Yes
Policy 1.4.1. The City shall continue to coordinate the provision of park and recreation facilities and activities with county, regional, and state plans and programs.	Yes
Policy 1.4.2. The City shall reach an agreement with the Lake County School Board to maintain and expand the use of school recreational facilities by the general public.	Yes
Policy 1.4.3. Then City shall continue to work with the Lake County Planning Department, the Lake County Water Authority, and the various local trail and hiking organizations to achieve the optimum use of former railroad beds for recreational purposes.	Yes
Policy 1.4.4. The City shall maintain a comprehensive inventory of ecological communities and shall recommend such acquisition, through the Conversation and Recreation Land (CARL) program, the Florida Communities Trust (FCT) program, the Save Our Rivers Program, and Lake County's land acquisition programs of the most vulnerable communities as deemed necessary by the City. The completion of the Palatlahaha Environmental and Agricultural Reserve (PEAR) Center shall be included on this list.	Yes
Policy 1.4.5. The City shall cooperate with Lake County in the acquisition of additional lands along Highway 27 to allow public access to the Palatlahaha Environmental and Agricultural Reserve (PEAR) Center in order to protect the Palatlahaha River and its upland buffer and to provide additional natural areas and open space to City residents.	Yes
Policy 1.4.6. The City will explore, in cooperation with Lake County, the Florida Department of Environmental Protection (DEP), the St. Johns' River Water Management District (SJRWMD), a means for extending the existing Palatlahaha River hiking trail through the Palatlahaha Environmental and Agricultural Reserve (PEAR) Center beyond its current limits as a part of a system of unified trails and greenways.	PEAR Park is run mostly by its own board. The southern half of the park which is intended for passive recreation and conservation is basically complete. The northern half of the park which comprises almost 25 acres is only 50% complete. This portion of the facility is for more active recreation such as a dog park, softball fields, an exercise trail, playground, etc.

Objective 1.5. Accessibility. Objective 1.5 indicates that by fiscal year 2005, the City will have assesses all public recreation and open space facilities for easy accessibility by all City residents including the elderly, the physically impaired, and the economically disadvantaged.

The policies under Objective 1.5 were reviewed in order to determine their continued relevance and applicability. Table ROS5 below summarizes the results of this review.

TABLE ROS5. RECREATION & OPEN SPACE ELEMENT OBJECTIVE 1.5 POLICY REVIEW

Policy	Relevant
Objective 1.5. Accessibility. By fiscal year 2005, the City shall assess all public recreation and open space facilities for easy accessibility by all City residents including the elderly, the physically impaired, and the economically disadvantaged.	This was addressed in the Recreation Impact Fee Study in 2004. Objective needs to be updated.
Policy 1.5.1. By fiscal year 2006, all public recreation and open space facilities shall be made easily assessable to all City residents including the elderly, the physically impaired, and the economically disadvantaged.	This has been achieved. Policy needs to be updated accordingly.
Policy 1.5.2. By 2006, all City recreation and open space facilities shall be constructed or redeveloped to provide access for the physically impaired.	This has been achieved. Policy needs to be updated accordingly.
Policy 1.5.3. All City owned facilities shall be accessible to automobiles, bicycles, and pedestrians where appropriate.	Yes
Policy 1.5.4. The City shall work with the Council on Aging, to provide access to City recreation and open space facilities.	Yes
Policy 1.5.5. The City shall provide recreation and open space programs for economically disadvantaged citizens through civic organizations.	Yes

Objective 1.6. Park Identification. Objective 1.6 requires the City of Leesburg to inventory and clearly identify parks through the creation of a uniform sign package.

The policies under Objective 1.6 were reviewed in order to determine their continued relevance and applicability. Table ROS6 below summarizes the results of this review.

TABLE ROS6. RECREATION & OPEN SPACE ELEMENT OBJECTIVE 1.6 POLICY REVIEW

Policy	Relevant
Objective 1.6. Park Identification. The City of Leesburg shall inventory and clearly identify parks through the creation of a uniform sign package.	Yes
Policy 1.6.1. By 2004, the City shall conduct an inventory of mini-parks and areas of potential designation as mini-parks.	This has been achieved. Policy needs to be updated accordingly.
Policy 1.6.2. By 2004, the City shall name and provide signage for clear identification of these mini-parks.	This has been achieved. Policy needs to be updated accordingly.
Policy 1.6.3. By 2005, the City of Leesburg shall establish and erect a uniform sign package for all City owned and maintained parks and recreational facilities.	This has been achieved. Policy needs to be updated accordingly.
Policy 1.6.4. By 2006, the City of Leesburg shall inventory and verify overall park acreage within the City, through the development of a Parks and Recreation Master Plan.	This has been achieved. Policy needs to be updated accordingly.

Objective 1.7. Private Development. Objective 1.7 calls for the City to coordinate the provision of mini-parks as either individual sites, or as part of larger parks in association with new residential developments, in order to meet the City’s recreation and open space demands.

The policies under Objective 1.7 were reviewed in order to determine their continued relevance and applicability. Table ROS7 below summarizes the results of this review.

TABLE ROS7. RECREATION & OPEN SPACE ELEMENT OBJECTIVE 1.7 POLICY REVIEW

Policy	Relevant
Objective 1.7. Private Development. As a part of new residential development, the City of Leesburg shall coordinate and encourage the provision of mini-parks as either individual sites, or as part of larger parks to meet the City’s recreation and open space demands.	Yes
Policy 1.7.1. The City shall coordinate ways and means for private developers to provide public recreation facilities within their developments.	Yes
Policy 1.7.2. As stated in the City’s Land Development Code, developers shall donate open space and recreation sites for public use, where such planned private development will cause the adopted levels of service to be exceeded. The amount of such donations shall be based on adopted local levels of service and the transfer shall be completed prior to the issuance of a final development order.	Yes
Policy 1.7.3. The City shall utilize the level of service review to recommend recreation improvements located within private development.	Yes

SANITARY SEWER ELEMENT

Objective 1.1. Existing Wastewater Treatment. Objective 1.1 addresses the provision of existing wastewater infrastructure and services including reclaimed water while conserving and protecting the potable water supplies.

The policies under Objective 1.1 were reviewed in order to determine their continued relevance and applicability. Table SS1 below summarizes the results of this review.

TABLE SS1. SANITARY SEWER ELEMENT OBJECTIVE 1.1 POLICY REVIEW

Policy	Relevant
Objective 1.1. Existing Wastewater Treatment. The city shall correct existing deficiencies; ensure that the minimum level of service for sanitary sewer is met, provide a level of treatment that meets the water quality standards for effluent limitations established by FDEP, and support the continued use of reclaimed water within the City's utility service area for environmentally suitable purposes and to conserve potable water supplies for future generations.	Yes
Policy 1.1.1. The City's adopted level of service for sanitary sewer treatment shall be 251 gallons per capita per day.	Yes
Policy 1.1.2. When evaluating collection force main and lift station capacity, the City shall use the following peak factors based upon the average design flow (ADF): flows to 0.050 MGD ADF use a 3.5 factor; flows 0.050 to 0.250 MGD ADF use a 3.0 factor; and flows above 0.250 MGD ADF use a factor of 2.5.	Yes
Policy 1.1.3. The City shall maintain an active sanitary sewer and reclaimed water utilities mapping program and perform an hydraulic analysis of the city system at least annually to prioritize needed improvements and replacements.	Yes
Policy 1.1.4. The City shall implement the capital improvement schedule to correct existing deficiencies and implement needed improvements in support of the 10-Year Water Facilities Work Plan, and update the schedule annually during the City's annual budget process.	Yes
Policy 1.1.5. All improvements and/or additions to sanitary sewer and reclaimed water facilities shall be compatible and adequate to meet the adopted level of service standards which conform to all applicable state and county environmental health standards and regulations, including those required by Rule 62-610, F.A.C/	Yes
Policy 1.1.6. All land use amendments shall require an analysis of the impact of such amendment on the adopted level of service standard and existing sanitary sewer facilities.	Yes
Policy 1.1.7. The City should plan construction of new sanitary sewer treatment facilities when capacity allocation of existing facilities is at seventy five percent (75%) of available capacity, and should have new facilities ready for operation when capacity allocation of existing facilities is at ninety percent (90%) of available capacity.	Yes
Policy 1.1.8. Maintain a quarterly monitoring program to evaluate wastewater treatment efficiencies and submit quarterly operating reports to the FDEP documenting results, including data relating to average and maximum daily flows.	Yes
Policy 1.1.9. Maintain a quarterly groundwater-monitoring program to evaluate groundwater quality and submit the results to FDEP.	Yes
Policy 1.1.10. Comply with bond covenants to ensure the maintenance and operations of facilities, and to provide recommendations for system maintenance and improvements.	Yes
Policy 1.1.11. Encourage continuing education of operating staff to ensure proficiency with respect to optimization of treatment and disposal processes.	Yes

Objective 1.2. Future Wastewater Treatment. Objective 1.2 addresses the provision of future wastewater infrastructure with the necessary capacity to serve approved and vested developments.

The policies under Objective 1.2 were reviewed in order to determine their continued relevance and applicability. Table SS2 below summarizes the results of this review.

TABLE SS2. SANITARY SEWER ELEMENT OBJECTIVE 1.2 POLICY REVIEW

Policy	Relevant
Objective 1.2. Future Wastewater Treatment. The City shall reserve sewer capacity and coordinate the extension of facilities and increased capacity for approved and vested development.	Yes
Policy 1.2.1. Regulations for sewer allocation vested rights and the period of vesting will be defined in the City's Code of Ordinances.	Yes
Policy 1.2.2. Following a determination of concurrency for sanitary sewer, and to ensure reserved capacity and adequate sanitary sewer facilities are in place with the impact of development, the City shall require payment of applicable sewer impact fees at the issuance of a building permit for in-City projects and prior to authorizing new sanitary sewer service for out-of-City projects.	Yes
Policy 1.2.3. The City shall implement the capital improvement schedule to prepare for future development and update the schedule annually during the City's annual budget process.	Yes

Objective 1.3. Maximize Existing Facilities. Objective 1.3 calls for compact efficient growth patterns in order to maximize existing sanitary sewer facilities.

The policies under Objective 1.3 were reviewed in order to determine their continued relevance and applicability. Table SS3 below summarizes the results of this review.

TABLE SS3. SANITARY SEWER ELEMENT OBJECTIVE 1.3 POLICY REVIEW

Policy	Relevant
Objective 1.3. Maximize Existing Facilities. The City shall maximize existing sanitary sewer facilities within its service area and shall promote compact efficient growth patterns.	Yes
Policy 1.3.1. The City shall require new developments to connect to the central sanitary sewer system where available.	Yes
Policy 1.3.2. The Code of Ordinances shall incorporate means and methods to ensure connection to the City's sanitary sewer system, where available, for those properties that lie within the service area. "Available" shall mean within two hundred (200) feet of a sanitary sewer collection system and accessible by a legally recorded easement or right-of-way.	Yes
Policy 1.3.3. When central sanitary sewer is available, septic tanks and package wastewater treatment plants will be disallowed.	Yes
Policy 1.3.4. Within the City's sanitary sewer service area, when existing central sanitary sewer service is determined to be unavailable to new development, the City shall require the new development to extend the central sewer system at the developer's expense to service subject property. The City may assist or enter into an up-sizing agreement with the developer at the City's discretion.	Yes
Policy 1.3.5. Maintain adequate sanitary sewer impact fees and user rates to ensure funding for new treatment, collection and effluent disposal systems.	Yes
Policy 1.3.6. The City shall update the Wastewater Rate Study every five (5) years.	Yes

Objective 1.4. Septic Tanks. Objective 1.4 calls for mandatory connection to the center sewer system, when available for existing residences and commercial establishments.

The policies under Objective 1.4 were reviewed in order to determine their continued relevance and applicability. Table SS4 below summarizes the results of this review.

TABLE SS4. SANITARY SEWER ELEMENT OBJECTIVE 1.4 POLICY REVIEW

Policy	Relevant
Objective 1.4. Septic tanks. The City shall mandate connection to the central sewer system, when available, for existing residences and commercial establishments, which are served by septic systems and are deemed to be detrimental to the health, safety, and welfare of the general public.	Yes
Policy 1.4.1. "Available" shall mean within two hundred (200) feet of a sanitary sewer collection system and accessible by a legally recorded easement or right-of-way.	Yes
Policy 1.4.2. By 2005, the City shall identify and map those areas within the City's service area which are served by septic systems and prioritize areas requiring central sewer service based on soil suitability, density, and environmental concerns.	Yes , update dates
Policy 1.4.3. Prioritize and incorporate line extensions into the capital improvement schedule to connect existing septic areas to the central sanitary sewer system. The City shall require the participation of the existing residents and/or developers in the cost of the sewer main line extensions.	Yes

Objective 1.5. Effluent Disposal. Objective 1.5 calls for the minimization of discharges into State and local waters by the continued use of its spray fields, and reclaimed water system.

The policies under Objective 1.5 were reviewed in order to determine their continued relevance and applicability. Table SS5 below summarizes the results of this review.

TABLE SS5. SANITARY SEWER ELEMENT OBJECTIVE 1.5 POLICY REVIEW

Policy	Relevant
Objective 1.5. Effluent Disposal. The City shall continue to minimize the discharge of wastewater into State and local waters through the continued utilization of its spray fields and construction/expansion of its reclaimed water system, and/or the utilization of rapid infiltration basins (RIBS), and support the continued use of reclaimed water within the City's utility service area for environmentally suitable purposes and to conserve potable water supplies	Yes
Policy 1.5.1. Maintain treatment facilities to provide for "unrestricted access" levels of treatment to allow for reuse of reclaimed water for irrigation of landscaped areas, as well as use in allowable industrial applications	Yes
Policy 1.5.2. The City shall prohibit the use of potable water for purposes of irrigation when and where reclaimed water becomes available.	Yes
Policy 1.5.3. The City shall require the installation of dual-lined distribution systems and individually metered connections for all new development. Connection of the reclaimed system to the potable water system shall be allowed when reclaimed water is not provided until such time as reclaimed water becomes available.	Yes
Policy 1.5.4. Back up storage and disposal of excess reclaimed water (during wet periods) will be provided by the City's existing spray fields and/or by the use of RIBS.	Yes
Policy 1.5.5. The City shall maintain its permit to allow discharge of reclaimed water and/or sprayfield underdrain discharge into the Okahumpka Swamp wetlands.	Yes
Policy 1.5.6. The City shall maintain a public awareness and education program regarding the use of reclaimed water.	Yes
Policy 1.5.7. The City shall require the conversion to the use of alternative water sources, including reclaimed water, at sites with existing dual-lined systems and on existing groundwater sources for irrigation when alternative sources becomes available.	Yes

Objective 1.6. Conservation of Reclaimed Water Resource. Objective 1.6 calls for the conservation of reclaimed water resources by minimizing the use of potable water from groundwater resources.

The policies under Objective 1.6 were reviewed in order to determine their continued relevance and applicability. Table SS6 below summarizes the results of this review.

TABLE SS6. SANITARY SEWER ELEMENT OBJECTIVE 1.6 POLICY REVIEW

Policy	Relevant
Objective 1.6. Conservation Of Reclaimed Water Resource. On an ongoing basis, minimize the use of potable water from groundwater resources by taking actions to maximize reclaimed water resources through the continued application of existing conservation regulations and practices to as provided for in the policies listed below.	Yes
Policy 1.6.1. The city shall continue to require that users of reclaimed water follow stated policies pertaining to the efficient operation of reclaimed water systems and conservation of reclaimed water resources.	Yes
<p>Policy 1.6.2. The SJRWMD has the exclusive authority to regulate consumptive uses of water under Chapter 373, F.S. The city shall adopt regulations to ensure for the efficient operation of the reclaimed water system or for the health or safety of the general public or the customer, regarding the following matters:</p> <ul style="list-style-type: none"> ▪ The times of day or night during which the reclaimed water may be used by customers. ▪ The maximum rate of use of the reclaimed water. ▪ The right to inspect reclaimed water devices, facilities, and terminate service to reclaimed water system found to be in violation of any city ordinance, regulation or procedure. ▪ The right to impose the requirement that upon being connected to the city's reclaimed water system, any existing wells on the subject property shall not continue to be used for irrigation and shall be disconnected from the irrigation system (unless otherwise approved by the cognizant permitting agency and the city manager). ▪ The right to impose the mandatory payment of fees for the installation and usage of reclaimed water systems. Once service is connected, the user shall pay a minimum monthly charge set by resolution of the city commission. ▪ The right to temporarily discontinue service to any portion of, or the entire, reclaimed water system as deemed necessary by the city. 	Yes
<p>Policy 1.6.3. The city manager herein adopts the authority to promulgate procedures and regulations with respect to the following matters, which procedures and regulations shall become effective upon a resolution approving such procedures and regulations being adopted by the city commission:</p> <ul style="list-style-type: none"> • Application procedures, forms and requirements, and allowable uses other than irrigation. All uses must be in accordance with applicable DEP regulations. • Installation requirements, including specification of acceptable materials, devices and regulations to prevent backflow or cross connections with other systems. • Procedures for enforcement of the ordinances and regulations pertaining to reclaimed water, including procedures for inspection of the customer's system. • Procedures for the orderly expansion of the reclaimed water system. • Procedures and regulations for the efficient operation of the reclaimed water system. 	Yes
<p>Policy 1.6.4. The city shall adopt regulations to ensure for the efficient operation of the reclaimed water system or for the health or safety of the general public or the customer, regarding the following matters:</p> <ul style="list-style-type: none"> ▪ The construction, operation, maintenance or property access to facilities/devices which are connected to or which controls a device or system connected to the city's reclaimed water system and which is not in compliance with all provisions of DEP regulations and city regulations and procedures related to reclaimed water. ▪ The tampering with, work on, alteration of or damage to any city reclaimed water facility is strictly prohibited. The city holds the offending person liable for the cost of all charges attributed to the correction 	Yes

<p>of such tampering and violations of city ordinance, which may include civil and criminal penalties.</p> <ul style="list-style-type: none"> ▪ The required use of cross connection control devices and submittal of device compliance test results: prior to connecting a user to the reclaimed water system, the public water supply shall be protected by the installation, at the user's expense, of an approved cross connection control assembly. ▪ The use of reclaimed water: reclaimed water shall not be directed or piped into any residence or building used as a dwelling unit. The right to inspect reclaimed water devices, facilities, and terminate service to reclaimed water system found to be in violation of any city ordinance, regulation or procedure. ▪ The right to establish schedules to control the use of reclaimed water in order to reduce maximum pressure demands on the system and to regulate the usage of reclaimed water to balance with supply and storage availability. 	
<p>Policy 1.6.5. The City shall maintain a progressive reclaimed water rate schedule to ensure conservation.</p>	<p>Yes</p>

SOLID WASTE ELEMENT

Objective 1.1 Solid Waste Disposal. Objective 1.1 calls for the continual satisfactory and economical collection and management of solid waste throughout the planning period.

The policies under Objective 1.1 were reviewed in order to determine their continued relevance and applicability. Table SW1 below summarizes the results of this review.

TABLE SW1. SOLID WASTE ELEMENT OBJECTIVE 1.1 POLICY REVIEW

Policy	Relevant
Objective 1.1. Solid Waste Disposal. The City shall continue to ensure satisfactory and economical solid waste management for all City residents through the 2001 – 2020 planning period.	Yes -Objective should be amended to update planning period.
Policy 1.1.2. The City shall maintain an interlocal agreement with Lake County regarding the safe and economical disposal of solid waste.	Yes
Policy 1.1.2. All solid waste disposal contracted or performed by the City of Leesburg shall be operated in a manner that complies with all applicable city, regional, state and federal solid waste disposal standards.	Yes
Policy 1.1.3. The City shall continue to provide long term maintenance care for the City of Leesburg Landfill facility and shall continue all required monitoring activities.	Yes
Policy 1.1.4. The City shall endeavor to remove and dispose of hazardous waste stored at the City of Leesburg Landfill.	Yes
Policy 1.1.5. The City shall secure the integrity of the City of Leesburg Landfill by keeping the gate closed at all times.	Yes

Objective 1.2 Solid Waste Collection. Objective 1.2 addresses the continued provision of solid waste collection.

The policies under Objective 1.2 were reviewed in order to determine their continued relevance and applicability. Table SW2 below summarizes the results of this review.

TABLE SW2. SOLID WASTE ELEMENT OBJECTIVE 1.2 POLICY REVIEW

Policy	Relevant
Objective 1.2. Solid Waste Collection. The City shall continue to provide solid waste collection services to city residential and commercial establishments located within Leesburg’s municipal boundary.	Yes
Policy 1.2.1. The City will continue to operate and maintain a self-supporting solid waste collection system within the municipal service area.	Yes
Policy 1.2.2. The level of service for solid waste collection shall be as follows: <ul style="list-style-type: none"> - Residential LOS: Once weekly collection of all residential garbage, yard grass, recyclables, and bulk pickup. - Commercial LOS: One to six times per week dumpster service, three times per week hand collection, once per week cardboard recycling, and bulk pickup on request. 	Yes
Policy 1.2.3. Solid waste collection shall be mandatory for all residential, commercial and industrial land uses within the City corporate limits through the use of contracted haulers and/or the City.	Yes
Policy 1.2.4. The City shall continue to require individual commercial establishments using compactors or roll-off containers over 40 cubic yards to provide solid waste collection service of these containers.	Yes
Policy 1.2.5. The City shall continue to monitor complaints regarding residential and commercial solid waste collection by the City and contracted haulers to ensure that the most efficient, orderly, sanitary and environmentally sound service is being provided.	Yes
Policy 1.2.6. The City shall endeavor to implement programs for the clean up of illegal dumpsites in a timely, efficient and environmentally sound manner.	Yes
Policy 1.2.7. The City shall endeavor to repair or replace all damaged super cans and recycle bins within 24 hours.	Yes
Policy 1.2.8. The City shall endeavor to replace old and leaking dumpsters and open top roll-off containers with new City owned dumpsters and containers to provide a more sanitary and aesthetic collection system.	Yes
Policy 1.2.9. The City shall establish and codify standard operating procedures for the collection of solid waste within the City.	Yes - The Code of Ordinances has been amended. The policy should refer to maintaining standards.
Policy 1.2.10. The City shall evaluate and revise the rate structures in the Code of Ordinances every 5 years.	Yes
Policy 1.2.11. The City shall conduct an audit of the residential and commercial collection routes for an evaluation of the effectiveness of the routes being served and those commercial hand collection accounts that can be converted to dumpster service every 5 years.	Yes

Objective 1.3 Recycling. Objective 1.3 addresses reduction of solid waste by maintaining and promoting recycling.

The policies under Objective 1.3 were reviewed in order to determine their continued relevance and applicability. Table SW3 below summarizes the results of this review.

TABLE SW3. SOLID WASTE ELEMENT OBJECTIVE 1.3 POLICY REVIEW

Policy	Relevant
Objective 1.3. Recycling. The City shall reduce the volume of municipal solid waste disposed of in the County's landfill facilities by maintaining and promoting its recycling program.	Yes
Policy 1.3.1. The City of Leesburg will promote the efforts of Lake County towards the reduction of the solid waste stream through implementation of a mandatory recycling program and by educating citizen on recycling.	Yes
Policy 1.3.2. The City shall continue to haul collected recyclables to the Lake County Solid Waste Management Facility in an effort to reduce the overall solid waste stream.	Yes
Policy 1.3.3. The City shall continue to have a recyclable collection process in place for curbside pickup of newspapers, glass, plastics, tin and aluminum.	Yes
Policy 1.3.4. The City shall continue to have a collection process in place for curbside pickup of yard waste	Yes

Objective 1.4 Hazardous Waste. Objective 1.4 addresses the monitoring and control of hazardous waste through coordination with Lake County.

The policies under Objective 1.4 were reviewed in order to determine their continued relevance and applicability. Table SW4 below summarizes the results of this review.

TABLE SW4 SOLID WASTE ELEMENT OBJECTIVE 1.4 POLICY REVIEW

Policy	Relevant
Objective 1.4. Hazardous Waste. The City shall coordinate with Lake County to monitor and control the disposal of hazardous wastes in accordance with State law.	Yes
Policy 1.4.1. The City will continue to educate its citizens regarding the proper handling and disposal of hazardous wastes.	Yes
Policy 1.4.2. The City shall coordinate with Lake County to promote and support the County's Amnesty Day Programs.	Yes

TRAFFIC CIRCULATION ELEMENT

Objective 1.1. Roadway Network. Objective 1.1 addresses the need to provide an attractive, safe, convenient, and efficient arterial, collector and local roadway system that serves travel demands within and through the City.

The policies under Objective 1.1 were reviewed in order to determine their continued relevance and applicability. Table T1 below summarizes the results of this review. The plan needs updating to include reference to the Lake Sumter MPO where appropriate.

TABLE T1. TRAFFIC CIRCULATION ELEMENT OBJECTIVE 1.1 POLICY REVIEW

Policy	Relevant												
Objective 1.1. Roadway Network. To provide attractive, safe, convenient, and efficient arterial, collector and local roadway system that serves travel demands within and through the City.	Objective is adequate.												
Policy 1.1.1. The arterial roadway system shall be designed through cooperation with the FDOT and Lake County to provide high-volume, multi-lane facilities with access controls, as needed, to preserve the through traffic carrying capacity of the facility. The City will require joint use access, cross access easements, and access prohibitions wherever traffic patterns and physical features make it possible in the development approval process.	Policy needs updating to include Lake Sumter MPO.												
Policy 1.1.2. The minimum Level of Service (LOS) standard to be adopted as part of this element and plan shall be as follows: <ul style="list-style-type: none"> - Limited Access Roads C, or as otherwise prescribed by FDOT - Arterials D - Collectors D 	Policy is adequate.												
Policy 1.1.3. A lower LOS may be acceptable immediately before and after special events where the impacts of such events on the roadway system are infrequent.	Policy is adequate.												
Policy 1.1.4. All major roadways shall be designed as complete transportation corridors, incorporating bicycle, pedestrian and transit features to achieve a true multi-modal system.	Policy is adequate.												
Policy 1.1.5. Projected traffic circulation system demand will be met and the LOS standards cited above will be maintained through the year 2020 by undertaking the projects listed on Error! Reference source not found.. The City will cooperate and extensively coordinate with the State and the County to ensure that these improvements are implemented by the dates indicated, and as the need develops. Proposed developments within the City will be monitored to determine if roadway infrastructure will be adequate to service projected demand, and development approvals will be dependent upon these criteria.	Projects will need to be updated as part of the EAR based amendment process.												
Policy 1.1.6. Lake County has adopted the following maximum through-lane standards for the below listed roadway classifications:	Yes												
<table border="0"> <thead> <tr> <th style="text-align: left;">Road Classification</th> <th style="text-align: center;">Maximum Through-Lane Standard</th> </tr> </thead> <tbody> <tr> <td>Principal Arterial</td> <td style="text-align: center;">6</td> </tr> <tr> <td>Minor Arterials</td> <td style="text-align: center;">6</td> </tr> <tr> <td>Major Collectors</td> <td style="text-align: center;">4</td> </tr> <tr> <td>Minor Collectors</td> <td style="text-align: center;">4</td> </tr> <tr> <td>Local Roadways</td> <td style="text-align: center;">2</td> </tr> </tbody> </table>	Road Classification	Maximum Through-Lane Standard	Principal Arterial	6	Minor Arterials	6	Major Collectors	4	Minor Collectors	4	Local Roadways	2	
Road Classification	Maximum Through-Lane Standard												
Principal Arterial	6												
Minor Arterials	6												
Major Collectors	4												
Minor Collectors	4												
Local Roadways	2												

Scenic Roadways	2	
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Objective 1.2. Roadway Connectivity. Objective 1.2 requires the City to establish an efficient system of roadway connectivity in association with the development review process.

The policies under Objective 1.1 were reviewed in order to determine their continued relevance and applicability. Table T2 below summarizes the results of this review.

TABLE T2. TRAFFIC CIRCULATION ELEMENT OBJECTIVE 1.2 POLICY REVIEW

Policy	Relevant
Objective 1.2. Roadway Connectivity. The City shall, through the development review process, require the provision of an efficient traffic circulation pattern.	Objective is adequate.
Policy 1.2.1. Within developments that incorporate traditional Neighborhood Design principals, the City shall establish design cross sections for local roads in the Land Development Code by 2005 that accommodate narrower rights-of-way and roadway widths consistent with traditional neighborhood development.	The Land Development Code has been amended. The policy should be amended to refer to maintaining design sections and the date removed.
Policy 1.2.2. The City shall require that roadways be dedicated to the public when there is a compelling public interest for the roadways to connect with existing public roadways.	Policy is adequate.
Policy 1.2.3. The City shall require that subdivisions of 100 units or more have at least two (2) points of access open to motor vehicle traffic.	Policy is adequate.
Policy 1.2.4. New subdivisions shall be required to "stub-out" to adjoining undeveloped lands to promote road connectivity, and to connect to existing roadways that are "stubbed-out" at their boundaries.	Policy is adequate.
Policy 1.2.5. The City shall establish access management standards in the Land Development Code by 2005 to ensure appropriate access to the City's transportation system. Standards may include the requirement of joint-use driveways and/or cross access easements to access sites.	The Land Development Code has been amended. The policy should be amended to refer to maintaining standards and the date removed.
Policy 1.2.6. The City shall preserve the movement function of the major thoroughfare system by requiring development of parallel frontage roads or cross access easements to connect developments as they are permitted along major roads.	Policy is adequate.
Policy 1.2.7. The City shall review through the Development Review Committee process all proposed development for consistency with future transportation projects listed on Error! Reference source not found. Error! Reference source not found. and for the implementation of the City's Bicycle Master Plan, when adopted.	The City has adopted a Trails Master Plan. The policy should be amended to reflect this.

Objective 1.3. Multi-Modal System. Objective 1.3 addresses the need for the City to promote alternative modes of transportation to provide a safe and efficient multi-modal system. Pursuant to the 1985 Growth Management Act, the City is required to replace the Traffic Circulation Element with a Transportation Element, the purpose of which is to provide policy guidelines which promote multimodal transportation solutions to mobility problems. All references to Traffic Circulation should be updated accordingly. Similarly, the plan needs updating to include reference to the Lake Sumter MPO where appropriate.

The policies under Objective 1.3 were reviewed in order to determine their continued relevance and applicability. Table T3 below summarizes the results of this review.

TABLE T3. TRAFFIC CIRCULATION ELEMENT OBJECTIVE 1.3 POLICY REVIEW

Policy	Relevant
Objective 1.3. Multi-Modal System. The City shall promote alternative modes of transportation to provide a safe and efficient multi-modal system.	Objective is adequate.
Policy 1.3.1. By 2004, the City shall develop standards in the Land Development Code for access to public transit, bicycle and pedestrian systems. Such standards shall apply to new developments, substantial improvements of existing developments, and to road improvements.	The Land Development Code has been amended. The policy should be amended to refer to maintaining standards and the date removed.
Policy 1.3.2. By 2005, the City shall review the Land Development Code to address provision of bus stops, bike parking and circulation, pedestrian walkways, and handicap accessible facilities within new developments and existing developments undergoing substantial improvements. Site plan reviews will ensure that intermodal transfers are efficiently implemented.	The Land Development Code has been amended. The policy should be amended to refer to maintaining standards and the date removed.
Policy 1.3.3. The City shall encourage increased land use densities and mixed uses, consistent with the Future Land Use Element to enhance the feasibility of transit and promote alternative transportation modes.	Policy is adequate.
<p>Policy 1.3.4. The City shall amend the Land Development Code to require that new development be compatible with and further the achievement of the Traffic Circulation Element. Requirements for compatibility may include but are not limited to:</p> <ul style="list-style-type: none"> - Orienting pedestrian access to transit centers as well as existing and planned routes. - Locating parking to the side or behind the development to provide pedestrian accessibility of building entrances and walkways to the street, rather than separating the building from the street by parking. - Providing clearly delineated routes through parking lots to safely accommodate pedestrian and bicycle circulation. 	The Land Development Code has been amended. The policy should be amended to refer to maintaining standards and "Traffic Circulation" changed to "Transportation".
Policy 1.3.5. The City shall analyze the viability of providing landscaping and streetscaping as roadway design components in order to enhance the function of collector roads and higher classification by 2006.	Standards have been established. The policy should be amended to refer to maintaining standards and the date removed.
Policy 1.3.6. A Citywide Bicycle and Pedestrian Circulation Master Plan shall be prepared and adopted by 2005. Priority will be given to those walkways for which heavy recreational usage is projected, as well as those along roadways between residential areas and schools, which can be implemented concurrently with other roadway improvements.	The City has adopted a Trails Master Plan. The policy should be amended to reflect this.

<p>Policy 1.3.7. The City's roadway system management will require implementation and construction of an adequate and safe pedestrian circulation system.</p>	<p>Policy is adequate</p>
<p>Policy 1.3.8. The City shall amend the Land Development Code by 2005 to require that sidewalks be constructed concurrently with new development, by the developer. Additional sidewalks will be constructed in existing developed areas when requested and funded by the abutting property owners.</p>	<p>The Land Development Code has been amended. The policy should be amended to refer to maintaining standards and the date removed.</p>
<p>Policy 1.3.9. The Land Development Code by 2005 shall be amended to require that new residential developments with densities of one or more dwelling units per acre provide sidewalks on every street.</p>	<p>The Land Development Code has been amended. The policy should be amended to refer to maintaining standards and the date removed.</p>
<p>Policy 1.3.10. Bike paths shall be established on one side of every arterial and collector street with sidewalks established on the opposite side of all arterial streets. The City shall coordinate with the County and the State to expand the current bicycle system.</p>	<p>Policy needs updating to include Lake Sumter MPO.</p>
<p>Policy 1.3.11. Whenever possible, intersections shall be made pedestrian-friendly by limiting the crossing width to 48 feet; use of adequate lighting; adequate timing for traffic signals; and the provision of facilities for the handicapped. The City shall coordinate with FDOT and the County to implement this policy.</p>	<p>Policy needs updating to include Lake Sumter MPO.</p>

Objective 1.4. Rights-of-way. Objective 1.4 requires the City to coordinate with the County and the State to prioritize and acquire future right-of-way in accordance with the future traffic circulation plan.

The policies under Objective 1.4 were reviewed in order to determine their continued relevance and applicability. Table T4 below summarizes the results of this review. The plan needs updating to include reference to the Lake Sumter MPO where appropriate.

TABLE T4. TRAFFIC CIRCULATION ELEMENT OBJECTIVE 1.4 POLICY REVIEW

Policy	Relevant
Objective 1.4. Rights-of-way. The City shall coordinate with the County and the State to prioritize and acquire future right-of-way in accordance with the future traffic circulation plan.	Objective needs updating to include Lake Sumter MPO.
Policy 1.4.1. The City shall adopt the Future Transportation Map to ensure the protection of future rights-of-way.	Policy is adequate.
Policy 1.4.2. The City shall continue requiring dedication of needed rights-of-way from new development, through subdivision regulations and applicable local ordinances.	Policy is adequate.
Policy 1.4.3. The City shall amend the setback requirements, zoning restrictions and right-of-way protection requirements, if necessary, to make the regulations consistent with this element.	Policy is adequate.
Policy 1.4.4. The City shall ensure adequate rights-of-way protection for intersections, interchanges and future park and ride sites in order to retain flexibility for future growth and expansion.	Policy is adequate.
Policy 1.4.5. The City shall adopt minimum rights-of-way requirements in the Land Development Code for new roadways containing the following provisions: Arterial Roadways – 150-foot right-of-way; Collector Roadways – 100-foot right-of-way; and Local Roads – 60-foot right-of-way (open drainage) and 50-foot right-of-way (curb and gutter). Developments that incorporate Traditional Neighborhood Design principles – Determined at the discretion of the City on a case-by-case basis.	The Land Development Code has been amended. The policy should be amended to refer to maintaining standards.
Policy 1.4.6. The City shall pursue grant opportunities for median landscaping and road beautification.	Policy is adequate.
Policy 1.4.7. The City shall research alternative funding sources, and utilize those which are feasible, to assist in expediting traffic circulation improvement programs and for the protection and acquisition of rights-of-way for preserving levels of service standards and system performance.	Policy is adequate.

Objective 1.5. Public Transit. Objective 1.5 requires the City to work with Lake County and the Lake County Transit Authority to provide a safe and efficient public transit system.

The policies under Objective 1.5 were reviewed in order to determine their continued relevance and applicability. Table T5 below summarizes the results of this review. The plan needs updating to include reference to the Lake Sumter MPO where appropriate.

TABLE T5. TRAFFIC CIRCULATION ELEMENT OBJECTIVE 1.5 POLICY REVIEW

Policy	Relevant
Objective 1.5. Public Transit. The City shall work with Lake County and the Lake County Transit Authority to provide a safe and efficient public transit system.	A public transit system is operating in Leesburg. This objective should be amended to reflect this.
Policy 1.5.1. The City shall encourage land uses and site developments that promote public transit within designated public transportation corridors, with priority given to those projects that will bring the greatest increase in transit ridership.	Policy is adequate.
Policy 1.5.2. Residential development greater than 200 units or commercial developments over 50,000 square feet shall incorporate space for bus stops. Transit ridership to and from such developments shall be encouraged and further improved by including elements, such as the following: <ul style="list-style-type: none"> - Transit stops meeting ADA requirements - Parking lots and intersections designed with minimum corner turning radii for buses - Clearly delineated walkways from the building to the transit stop - Commercial and multi-family buildings and transit stops placed closer to the street. 	Policy is adequate.
Policy 1.5.3. The City shall ensure that all roads serviced by public transit routes function at a level of service sufficient to support the bus service.	Policy is adequate.
Policy 1.5.4. The City shall notify the Lake County Transit Authority of any proposed traffic generators/attractors submitted to the City for review.	Policy should be updated to reflect current provider.
Policy 1.5.5. The City shall work with the Lake County Transit Authority to improve existing bus stops, and to design new ones to include benches, signage, lights, and protection from the elements. Bus stops shall also be convenient for the handicapped.	Policy should be updated to reflect current provider and future extensions to service.

Objective 1.6. Intergovernmental Coordination. Objective 1.6 seeks traffic planning coordination with the FDOT, Lake County, ECFRPC, Lake County Transit Authority, neighboring jurisdictions and other transportation related agencies.

The policies under Objective 1.6 were reviewed in order to determine their continued relevance and applicability. Table T6 below summarizes the results of this review. The objective needs modifying to refer to “transportation planning” rather than “traffic planning”. The objective and policies also need updating to include reference to the Lake Sumter MPO where appropriate.

TABLE T6. TRAFFIC CIRCULATION ELEMENT OBJECTIVE 1.6 POLICY REVIEW

Policy	Relevant
Objective 1.6. Intergovernmental Coordination. Traffic circulation planning will be coordinated with the FDOT, Lake County, ECFRPC, Lake County Transit Authority, neighboring jurisdictions and other transportation related agencies	The objective needs updating to refer to “transportation planning” and Lake Sumter MPO.
Policy 1.6.1. The City Community Development and Public Works Departments shall review subsequent versions of the FDOT Five-Year Transportation Plan, in order to update or modify this element, as necessary.	The policy needs updating to reflect the role of Lake Sumter MPO.
Policy 1.6.2. The Community Development and Public Works Departments shall review updates to the 2020 Lake County Transportation Plan, and the Transportation Element of the Lake County Comprehensive Plan, in order to update or modify this element, as necessary.	The policy needs updating to reflect the role of Lake Sumter MPO.
Policy 1.6.3. The City shall promote a comprehensive transportation planning process that coordinates state, regional, and local transportation plans.	The policy needs updating to reflect the role of Lake Sumter MPO.
Policy 1.6.4. The City will support the State and the County on the establishment of alternative transportation systems, including high speed and commuter rail line systems connecting Lake County with other areas in Florida.	The policy needs updating to reflect the role of Lake Sumter MPO.
Policy 1.6.5. The City shall coordinate with the County to adjust the population projections used in the model, to make them consistent with the City population projections.	The policy needs updating to reflect the role of Lake Sumter MPO.
Policy 1.6.6. The City shall coordinate with the FDOT, Lake County, and the municipalities of Lady Lake, Fruitland Park, Tavares, Eustis, and Mount Dora to alleviate, through planning improvements, any existing or projected deficiencies along US 441 and US 27/441. Alternate facilities shall be investigated as alternate routes and the City shall coordinate with the FDOT for the establishment of sections of US 441 as special transportation areas.	The policy needs updating to reflect the role of Lake Sumter MPO.
Policy 1.6.7. The City of Leesburg shall annually monitor traffic counts and, in coordination with the FDOT and Lake County, designate future projects in the capital improvements program to assure compliance with level of service standards.	The policy needs updating to reflect the role of Lake Sumter MPO.

Objective 1.7. Concurrency Management System. Objective 1.7 requires the City to maintain a Concurrency Management System to ensure that transportation facilities and services needed to support development and redevelopment are available concurrent with the impacts of such development.

The policies under Objective 1.7 were reviewed in order to determine their continued relevance and applicability. Table T7 below summarizes the results of this review.

TABLE T7. TRAFFIC CIRCULATION ELEMENT OBJECTIVE 1.7 POLICY REVIEW

Policy	Assessment
Objective 1.7. Concurrency Management System. The City shall maintain a Concurrency Management System to ensure that transportation facilities and services needed to support development and redevelopment are available concurrent with the impacts of such development.	Policy is adequate.
Policy 1.7.1. The City shall continue requiring that adequate transportation facilities to maintain the City's level of service standards be available to meet the traffic demands of all new development prior to the issuance of a final development order, in accordance with the Concurrency Management Provisions set forth in the Capital Improvements Element of this Plan.	Policy is adequate.
Policy 1.7.2. The City shall amend the Land Development Code to require submittal of a Transportation Impact Study for all new development which is expected to generate 500 or more trips per day of use, or as deemed necessary by City Staff.	The Land Development Code has been amended. The policy should be amended to refer to maintaining standards.
Policy 1.7.3. New developments, regardless of size, shall provide operational improvements to the City' transportation system to mitigate their impacts on the system, to ensure smooth traffic flow, and to aid in the elimination of hazards. Improvements may include, but are not limited to, the addition of turn lanes, deceleration lanes, signage, signals and pavement markings.	Policy is adequate.

OVERALL PLAN RECOMMENDATIONS

The following section includes a complete listing of the Evaluation and Appraisal Report recommendations by Element. These recommendations are made as a result of the evaluation and appraisal of the Leesburg Comprehensive Plan that is documented in the above sections.

GENERAL

The City's Comprehensive Plan update, adopted in 2003, was based on analysis undertaken at that time. The data and analysis for each element should be updated during the EAR-based amendment process. The goals, objectives and policies (GOPs) for each element need to be modified to address outdated dates, references and the new planning timeframe for the EAR-based amendments. The updated plan shall include all amendments that are required to address the changes in state law that have occurred since 2002.

Below are some general overall recommendations for the plan, followed by specific recommendations for each element.

Recommendation G1: The City has the opportunity to include an optional Economic Development Element. As Economic Development was a major issue identified during the EAR process, and the City has the foundation of such an element in its existing Strategic Economic Development Plan, it is recommended that an Economic Development Element be included within the Comprehensive Plan.

Recommendation G2: Work with Lake County and neighboring municipalities to develop Joint Planning Agreements for future annexation areas, including planning for development in these areas, addressing procedures to ensure consistent development standards, and providing for the annexation of enclaves into the City.

Recommendation G2: Review appropriate elements to ensure that policies which support the "Communities for a Lifetime" initiative are included.

Recommendation G3: Review appropriate elements to ensure that policies which support low impact development techniques are included.

Recommendation G4: Review appropriate elements to ensure that the public health implications of development and redevelopment are addressed.

Recommendation G5: Review the feasibility of implementing a local PACE demonstration project in coordination with the State and Lake County Health Department.

Recommendation G6: Review the feasibility of participating in the Local Government Comprehensive Planning Certification Program.

Recommendation G7: Review the feasibility of developing a "community vision" and establishing an "urban service boundary", per F.S. 163.3177 & 163.3184.

AQUIFER RECHARGE ELEMENT

Recommendation AR1: Policy 1.3.2 will need to be revised to delete date and indicate that the City will maintain the leak detection and repair program for its potable water utilities.

AVIATION ELEMENT

Recommendation A1: Update Objective 1.2 to reflect airport's status as an international airport.

Recommendation A2: Update policy 1.2.1 to reflect airport's status as an international airport.

Recommendation A3: Update policy 1.2.1 to reflect airport's status as an international airport.

Recommendation A4: Update Objective 1.3 from "Traffic Circulation Element" to "Transportation Element".

Recommendation A5: Update Policy 1.3.1 from "Traffic Circulation Element" to "Transportation Element".

Recommendation A6: Update Policy 1.3.2 to include Lake Sumter MPO.

Recommendation A7: Update Objective 1.4 to include Lake Sumter MPO

Recommendation A8: Update Policy 1.4.1 to include Lake Sumter MPO

Recommendation A9: Update Objective 1.4.2 to include Lake Sumter MPO

Recommendation A10: Update Policy 1.4.3 from "Traffic Circulation Element" to "Transportation Element".

Recommendation A11: Update Policy 1.4.4 from "Traffic Circulation Element" to "Transportation Element".

CAPITAL IMPROVEMENTS ELEMENT

Recommendation CIE1: Update Capital Improvement Schedule in accordance with F.S. 163.3177.

CONSERVATION ELEMENT

Recommendation CON1: Revise Policy 1.5.7 to indicate that the City will maintain regulations prohibiting all new mining within the City boundaries pursuant to the City's Code of Ordinances.

Recommendation CON2: Revise Policy 1.6.5 to indicate the continuance of regulations governing the maintenance of pollutant emissions standards based on federal, state, and local standards for industrial lands.

Recommendation CON3: Revise Policy 1.9.1 to indicate that the City will maintain regulations prohibiting all new mining within the City boundaries pursuant to the City's Code of Ordinances.

Recommendation CON4: The City should consider adding a new policy to address energy conservation incentive programs for projects that seek certification by Florida Green Building Coalition, United States Green Building Coalition (LEED Certifications), Energy Star and Water Star.

Recommendation CON5: The City should consider adding a new policy to address strategies to reduce greenhouse gas emissions (i.e. higher residential densities within the downtown area, better coordination with public transit provider, coordination with Lake County to create a master bike plan).

DRAINAGE ELEMENT

None

FUTURE LAND USE ELEMENT

Recommendation FLU1: Update Policy 1.1.1 to include new mixed use future land use designations.

Recommendation FLU2: Review intensity and density of different land use designations.

Recommendation FLU3: Develop an overlay area and associated policies for new development in the CR 470 area.

Recommendation FLU4: Establish a new target date in Policy 1.1.3 for establishing zoning districts that correspond to specific land use categories.

Recommendation FLU5: Update Policy 1.3.1 to reflect the City's designation of the US27/441 corridor as a CRA.

Recommendation FLU6: Policy 1.4.10 is not required and may be deleted.

Recommendation FLU7: Policy 1.5.2 is no longer required and should be deleted.

Recommendation FLU8: Revise Policy 1.5.5 to delete date as the City has mapped those areas within its service area served by septic systems.

Recommendation FLU9: Policy 1.5.6 should be updated as this has now been achieved.

Recommendation FLU10: Policy 1.5.16 is not required and may be deleted.

Recommendation FLU11: Update Policy 1.6.2 to reflect the fact that the City's Code of Ordinances have been amended as per the policy requirements.

Recommendation FLU12: Policy 1.6.6 is not required and may be deleted.

Recommendation FLU13: Policy 1.8.2 should be updated to reflect new target dates for establishing JPAs with the County and neighboring cities.

Recommendation FLU14: Policy 1.8.4 should be updated to refer to continually reviewing opportunities to annex enclaves.

Recommendation FLU15: Policy 1.11.6 should be updated to establish a new target date for maintaining an electronic database that identifies the location of potential archeological and historic sites.

Recommendation FLU16: Update Policy 1.11.7 to reflect the fact that the City's Land Development Code has been amended as per the policy requirements.

Recommendation FLU17: Address the issue of standards for electric distribution substations as per requirement of F.S.163.3208.

Recommendation FLU18: Include criteria to achieve compatibility of lands near Leesburg International Airport in accordance with F.S.163.3177(6)(a).

Recommendation FLU19: Review land use designations and assure they are consistent with future land use map.

HOUSING

Recommendation H1: Review Policy 1.1.4 to determine whether the city still wishes to offer density bonuses for affordable housing, and amend target date if appropriate.

Recommendation H2: Set target date for land development regulations listed in Policy 1.1.5.

Recommendation H3: In Objective 1.2 review the figure of 10 units per year to assess whether this is adequate or needs to be amended.

Recommendation H4: Review Objective 1.4 to determine if the City wishes to maintain the 35% target or an alternative figure. Update year.

Recommendation H5: Update Policy 1.3.5 to reflect establishment of Housing Task Force.

Recommendation H6: Review Policy 1.3.8 to determine if the City wishes to provide affordable housing density bonuses in the Zoning Districts and set a new target date.

Recommendation H7: Review Policy 1.3.9 to determine whether the City wishes to create zero-lot-line regulations in certain residential zoning districts.

Recommendation H8: Review Policy 1.3.10 to determine whether the City wishes to maintain these requirements.

Recommendation H9: Amend Policy 1.3.11 to refer to the Housing Department, rather than the Community Development Department.

Recommendation H10: Review Policy 1.3.12 to determine whether the City wishes to maintain this requirement and set a new target date.

Recommendation H11: Amend wording of Objective 1.6 to reflect the fact that the City does not have a Neighborhood Partnership Program.

Recommendation H12: Amend or delete Policy 1.6.6 as the City has not identified funds for a Neighborhood Coordinator or to implement a Neighborhood Partnership Grant Program.

Recommendation H13: Amend Policy 1.6.7 to reflect the fact that the City eliminated the Neighborhood Partnership Program and transferred those responsibilities to the CRAs and the local churches.

Recommendation H14: Delete Policy 1.7.2.

Recommendation H15: Review F.S. 163.31771 to determine whether the City wishes to amend the plan in respect of accessory dwelling units.

Recommendation H16: Address the issue of housing for extremely low income person as per requirements of F.S.163.3177.

Recommendation H17: Review F.S.163.3209 to determine whether the City wishes to include an affordable housing land donation density incentive bonus in the comprehensive plan.

Recommendation H18: Review F.S.163.3180 to determine whether the City wishes to exempt certain workforce housing development from concurrency.

INTERGOVERNMENTAL COORDINATION ELEMENT

Recommendation ICE1: Amend Policy 1.1.1 to reflect the fact that a list can be compiled at any time using Clerk's Indexing System.

Recommendation ICE2: Amend Policy 1.1.11 to establish new target for to JPA.

Recommendation ICE3: Amend Policy 1.2.2 to reflect that an agreement has been established.

Recommendation ICE4: Update Policy 1.3.1 to reflect the role of the MPO.

Recommendation ICE5: Review Policy 1.4.3 to determine whether the City still wishes to follow this course of action and amend policy accordingly.

Recommendation ICE6: Include new policies supporting/participating in local and regional economic development initiatives.

Recommendation ICE7: Include section recognizing Leesburg International Airport Masterplan as per F.S.163.3177(6)(h)1.b.

Recommendation ICE8: Include mandatory dispute resolution process per requirement in F.S.163.3177(6)(h)1.c.

Recommendation ICE9: Include provision for interlocal agreements with adjacent local governments regarding airport zoning regulations as per requirement in F.S.163.3177(6)(h)1.d.

Recommendation ICE10: Include an objective that ensures adoption of interlocal agreements within one year of adoption of amended ICE as per requirement of 9J-5.015(3)(b).

Recommendation ICE11: Establish joint processes for the siting of facilities with county-wide significant as per requirement of 9J-5.015(3)(c).

POTABLE WATER ELEMENT

Recommendation PW1: Revise Policy 1.1.6 to indicate the continuance of the preventive maintenance program for the potable water treatment facilities as the City has implemented the program.

Recommendation PW2: Revise Policy 1.4.3 to delete date and indicate continuance of the reclaimed water master plan as the City has prepared and maintains the master plan for use in planning purposes.

Recommendation PW3: Revise Objective 2.1 to delete date and indicate continuance of the monitoring program of the water distribution system for fire protection demands as the system has been upgraded.

Recommendation PW4: The City should consider a new policy to offer incentives to existing development to upgrade plumbing devices to EPA Water Sense fixtures.

PUBLIC SCHOOLS ELEMENT

None.

RECREATION AND OPEN SPACE ELEMENT

Recommendation ROS1: Revise Policy 1.1.3 to establish a new target date.

Recommendation ROS2: Amend Policy 1.1.4 to reflect the fact that these standards have already been adopted.

Recommendation ROS3: Amend Policy 1.1.6 to reflect the fact that the study was completed.

Recommendation ROS4: Amend Policy 1.2.1 to reflect work done to date and future opportunities.

Recommendation ROS5: Amend Policy 1.4.6 to reflect work done to date and future opportunities.

Recommendation ROS6: Amend Objective 1.5.1 to reflect the fact that the study was completed.

Recommendation ROS7: Update Policy 1.5.1 to reflect that this has been achieved.

Recommendation ROS8: Update Policy 1.5.2 to reflect that this has been achieved.

Recommendation ROS9: Update Policy 1.6.1 to reflect that this has been achieved.

Recommendation ROS10: Update Policy 1.6.2 to reflect that this has been achieved.

Recommendation ROS11: Update Policy 1.6.3 to reflect that this has been achieved.

Recommendation ROS12: Update Policy 1.6.4 to reflect that this has been achieved.

Recommendation ROS13: Add waterways as per F.S.163.3177.

SANITARY SEWER ELEMENT

Recommendation SS1: Revise Policy 1.4.2 to delete date as the City has mapped those areas within its service area served by septic systems.

SOLID WASTE ELEMENT

Recommendation SW1: Revise Objective 1.1 regarding solid waste disposal to amend dates of planning period.

Recommendation SW2: Revise Policy 1.2.9 to state maintaining standards for the collection of solid waste within the City as the Code of Ordinances has been amended.

TRAFFIC CIRCULATION ELEMENT

Recommendation T1: Rename "Transportation Element"

Recommendation T2: Update all dates and references in the Element to: refer to "Transportation" rather than "Traffic Circulation", include reference to Lake Sumter MPO, reflect the current five (5), ten (10) and twenty (20) year planning horizons; update information on public transit system, and; update lists of transportation projects.

Recommendation T3: The Existing & Future Transportation Maps will need to be updated as part of the EAR based amendment process.

Recommendation T4: Review policies and establish new policies which promote multi-modal transportation opportunities.

Recommendation T5: Develop objective and policies to better integrate land uses with transportation initiatives.

Recommendation T6: Update Policy 1.1.5 in respect of end year and projects referred to in Table II-8.

Recommendation T7: Update Policy 1.2.1 to refer to maintaining design sections and remove date.

Recommendation T8: Update Policy 1.2.5 to refer to maintaining standards and remove date.

Recommendation T9: Amend Policy 1.2.7 to reflect that fact that the City has adopted a Trails Master Plan rather than a Bicycle Master Plan.

Recommendation T10: Update Policy 1.3.1 to refer to maintaining standards and remove date.

Recommendation T11: Update Policy 1.3.2 to refer to maintaining standards and remove date.

Recommendation T12: Update Policy 1.3.4 to refer to maintaining standards, and to refer to "Transportation" rather than "Traffic Circulation".

Recommendation T13: Update Policy 1.3.5 to refer to maintaining standards and remove date.

Recommendation T14: Amend Policy 1.3.6 to reflect that fact that the City has adopted a Trails Master Plan and remove date.

Recommendation T15: Amend Policy 1.3.8 to refer to maintaining standards and remove date.

Recommendation T16: Amend Policy 1.3.9 to refer to maintaining standards and remove date.

Recommendation T17: Update Policy 1.3.10 to include Lake Sumter MPO.

Recommendation T18: Update Policy 1.3.11 to include Lake Sumter MPO.

Recommendation T19: Update Objective 1.4 to include Lake Sumter MPO.

Recommendation T20: Amend Policy 1.4.5 to refer to maintaining standards.

Recommendation T21: Update Objective 1.5 to the status of the public transit system operating in Leesburg.

Recommendation T22: Update Policy 1.5.4 to reflect current provider.

Recommendation T23: Update Policy 1.5.5 to reflect current provider and future extensions to service.

Recommendation T24: Update Objective 1.6 to “transportation planning” and Lake Sumter MPO.

Recommendation T25: Update Policies 1.6.1-1.6.7 to reflect the role of Lake Sumter MPO.

Recommendation T26: Amend Policy 1.7.2 to refer to maintaining standards and remove date.

Recommendation T27: Review F.S. 163.31777 to determine whether the City wishes to take advantage of the provision to waive the concurrency requirement for transportation facilities in specific areas.

Recommendation T28: Review the potential to establish Transportation Concurrency Exception Areas or Transportation Concurrency Management Areas.

Recommendation T29: Submit de minimis transportation impact records with updated annual capital improvements element update.



MAPS

MAP 1: ANNEXATIONS

MAP 2: FUTURE LAND USE

MAP 3: VACANT LAND

MAP 4: PROPOSED JPA AREA

APPENDICES

[APPENDIX A: CITY OF LEESBURG REQUEST FOR LETTER OF UNDERSTANDING](#)

[APPENDIX B: LETTER OF UNDERSTANDING FROM DEPARTMENT OF COMMUNITY AFFAIRS](#)

[APPENDIX C: LIST OF ANNEXATIONS](#)

[APPENDIX D: CHANGES IN RULE 9J-5, FLORIDA ADMINISTRATIVE CODE](#)

[APPENDIX E: CHANGES IN CHAPTER 163, FLORIDA STATUTES](#)