LPG Urban &
Regional Planners, Inc.

October 9, 2012

Ms. Tracy Suber
Educational consultant – Growth Management Liaison
Florida Department of Education
325 W. Gaines Street, Suite 1014
Tallahassee, FL 32399-0400

Re: Leesburg 12-1ER

Dear Ms. Suber:

We are in receipt of your correspondence dated September 21, 2012 addressed to Mr Ray Eubanks regarding the above referenced comprehensive plan amendment. The following provides responses to the comments outlined in the letter.

1. The proposed amendments are not supported with data and analysis to evidence coordination with the Lake County school district pursuant to the Community Planning Act, the city's Intergovernmental Coordination Element (ICE), and the Interlocal Agreement for School Facilities Planning and Siting. Sections 163.3177(6)(h) and 163.31777, F.S., ICE Objective 1.2 and associated policies, and sections 1.3, 1.4, 2.3.3, and 5.1.1 of the interlocal agreement require coordination of the local government plan with the plans of the school board, require coordination on population projections and school enrollment, and establish a process for the school board to inform the city regarding the effect of comprehensive plan amendments on school capacity.

Prior to adoption, the city should complete the planning coordination required by law in accordance with the procedures prescribed by the city's plan and the interlocal agreement.

Response: The coordination process started in the spring of 2011 when major changes were made to school concurrency and the State's Growth Management laws. The Community Planning Act of 2011 eliminated the requirement that local governments adopt a Public School Facilities element and since the City of Leesburg was a party to the "School Concurrency Interlocal Agreement" with the Lake County School Board and Lake County which requires them to enforce school concurrency in their jurisdiction they opted to delete the Public School Facilities element. Pursuant to the Interlocal

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Agreement representatives of the cities, Lake County, and the school board meet on a quarterly basis and is known as the Local Planners Technical Working Group. The cities share their population projections, future development trends; current projects, residential developments, and building permit activity at the quarterly meetings with the School Board. The School Board outlines their current status as to student station numbers, capacity issues if any, and available stations and where. Funding issues and transportation are discussed as well.

There is also a Lake Educational Concurrency Review Committee which holds meetings annually. At the December 2011 committee meeting Greg Beliveau indicated that the City of Leesburg, along with the cities of Fruitland Park and Umatilla have opted to delete the Public School Facilities element and wanted to coordinate with the School Board regarding this issue. Mr. Beliveau explained that none of the cities were proposing to remove the requirement for school concurrency from their comprehensive plans and the cities will continue to maintain educational facilities siting policies in the Future Land Use element, and Public School Facilities LOS in the Capital Improvement elements in accordance with Florida States 163.3180(6)(c). These measures would continue to ensure that schools are planned for and provided to meet the needs of existing and future residents. Mr. Beliveau was informed to coordinate with the School Board attorney, Mr. Steve Johnson regarding this matter.

In January 2012, Mr. Johnson drafted a Memorandum of Understanding which was reviewed by the County Attorney, and was subsequently approved. At the January 2012 Local Planners Technical Work Group meeting, the memorandum was presented and discussed. The Memorandum of Understanding was then sent to the Cities of Leesburg, Fruitland Park and Umatilla for approval and execution by the respective mayors. Once signed by the cities, the memorandum was sent to the School Board for execution.

Please find enclosed the executed Memorandum of Understanding, Draft minutes of the December 8, 2011 Lake County Educational Concurrency Review Committee and agenda, and the informal minutes from the January 2012 Local Planners Technical Working Group.

2. Sections 163.3177(1)(f) and 163.3177(6)(a), F.S., require a comprehensive plan and plan amendments to be based on data and analysis, specifically whether adequate public facilities and services are available or are planned to be available to support the change. The city did not provide an analysis of the effects of the proposed increase of 33,903 residential units on public school facilities. Based on the best data available to the department it appears that the density increase creates the need for 4.4 elementary schools, 2.6 middle schools, and 1.8 high schools through the end of the

city's long-range planning period. The analysis (copy enclosed) considered the school district's 10-year long-range plan to build two relief elementary schools in Planning Area 3, even though those schools are not yet fully funded. The current educational facilities plan does not include capacity enhancements for either the middle schools or the high school in Planning Area 3 in the 10-year or 20-year long-range planning periods.

Because the necessary planning coordination has not yet been completed, the amendment as proposed has the potential to create significant adverse effects on public school facilities. Prior to adoption, the city should collaborate with the Lake County school district to develop a specific planning framework to address the need for additional school capacity in the area. Based on local needs and as supported by appropriate data and analysis, the framework could include policies to establish a residential development phasing plan, require dedication of suitable sites for future school development, and include a capital plan to correct anticipated school capacity deficiencies in phase with residential development.

Response: The amended plan for Leesburg specifically retains references in Objective 1.2 of the Intergovernmental Coordination Element and policies 1.2.1, 1.2.2, 1.2.3, and 1.2.4 which continue support, compliance and authorization of the Interlocal Agreement between Lake County, Lake County School Board and the City of Leesburg. This agreement outlines compliance with FS 163.3177 and 163.31777. This will allow the city and school board via LOS for their specific responsibilities to plan and coordinate using concurrency to maintain the LOS thru specific planning horizons. In addition, the Capital Improvement element has been edited by adding back to policy 1.2.3 the LOS for schools to comply with FS 163.380.

The statute addresses the timeframe for capital improvements to be addressed and the School Board adopts Facilities Work Programs annually and it is referenced in the Interlocal Agreement and this shared with the City each year.

Please note from the enclosed School Concurrency Management Report dated December 8, 2011 that the report contains the Lake County Population Trends and Projections through 2030 (Table 5) which includes the City of Leesburg. The 2030 projected population is the same as submitted in the Future Land Use element data and analysis. The city in cooperation with Lake County arrived at these projections and provided same to the School Board. Based on a projected population of 65,710 in 2035 which equates to a total of 27,726 residential units based on a persons per household of 2.37 (2010 Census data).

The potential additional units referred to in question 2 above of 33,903 was taken from data within the Housing data and analysis and was based on a vacant lands analysis strictly using a density factor. This density factor does not take into account open space requirements, stormwater facilities, internal roadway network, or wetlands. The purpose of this analysis was to show that the City has designated sufficient lands on the Future Land Use Map to accommodate future growth and allow for free market enterprise in the delivery of housing stock. When calculating projected impacts to schools this data should not be utilized as its intent was only to show that the City had designated sufficient lands to accommodate growth and provide for a free market enterprise.

For planning purposes, the City must be able to accommodate the required residential units necessary to serve the projected population of 65,710 in 2035 which equates to a total of 33,271 residential units based on a persons per household of 2.37 (2010 Census data) and a vacancy rate of 20%. The existing housing stock within the city is 10,401 (based on the 2009 American Community Survey), therefore by 2035 the city will need an additional 22,870 residential units. The adopted Lake County Schools Five Year Facilities Master Plan already incorporates the projected population for the year 2015-2016; therefore, these anticipated students will be deducted since they are already accounted for in the schools projected enrollment (22,870 residential units – 3,759 residential units = 19,111 residential units of which 61% are anticipated to be single family and 39% are anticipated to be multi-family). Utilizing this data, the potential impact to schools can be calculated.

SCHOOL	SF UNITS	STUDENT GENERATION RATE	STUDENTS GENERATED	MF UNITS	STUDENT GENERATION RATE	STUDENTS GENERATED	GRAND TOTAL
ELEMENTARY	11,658	0.186	2,168	7,453	0.131	976	**3,144**
MIDDLE		0.100	1,166		0.057	425	**1,591**
HIGH		0.124	1,446		0.066	492	**1,938**
GRAND TOTAL							**6,673**

SCHOOLS – PLANNING AREA 3	PROJECTED SCHOOL ENROLLMENT 2015-2016*	CAPACITY BASED ON DFWP	PROJECTED 5-YEAR CAPACITY %	STUDENT ENROLLMENT W/IMPACT	% OF PERM. CAPACITY W/IMPACT
ELEMENTARY	3,363	5,300	63%	6,507	123%
MIDDLE	1,763	1,904	93%	3,354	176%
HIGH	1,721	2,041	84%	3,659	179%

The 2011 Growth Management Law allows capacity to be calculated on a district wide basis rather than just a planning area. The following table provides the district wide analysis.

SCHOOLS – DISTRICT WIDE	FY 2020 PROJECTED ENROLLMENT*	TOTAL EXISTING & PLANNED CAPACITY THROUGH FY 2015	STUDENTS GENERATED	2035 STUDENT ENROLLMENT W/IMPACT	% OF PERM. CAPACITY W/IMPACT
ELEMENTARY	21,826	19,157	3,144	24,970	130%
MIDDLE	10,696	10,718	1,591	12,287	115%
HIGH	13,051	13,418	1,938	14,989	112%

* The FY 2020 projected enrollment has been revised to deduct the City of Leesburg FY 2020 projected students because they have been included within the students generated column.

The above analysis indicates that one elementary school, one middle school and one high school will be needed district wide to meet the projected student population in 2035.

The above analysis does not take into consideration that the school impact from the Secret Promise DRI has already been mitigated; therefore, the following tables reflect a revised analysis based on a deletion of 6,800 residential units from the projected 19,111 residential units leaving a total of 12,311 additional residential units of which 61% are anticipated to be single family and 39% are anticipated to be multi-family. Utilizing this data, the potential impact to schools can be calculated.

SCHOOL	SF UNITS	STUDENT GENERATION RATE	STUDENTS GENERATED	MF UNITS	STUDENT GENERATION RATE	STUDENTS GENERATED	GRAND TOTAL
ELEMENTARY	7,510	0.186	1,397	4,801	0.131	629	**2,026**
MIDDLE		0.100	751		0.057	274	**1,025**
HIGH		0.124	931		0.066	317	**1,248**
GRAND TOTAL							**4,299**

SCHOOLS – PLANNING AREA 3	PROJECTED SCHOOL ENROLLMENT 2015-2016*	CAPACITY BASED ON DFWP	PROJECTED 5-YEAR CAPACITY %	2035 STUDENT ENROLLMENT W/IMPACT	% OF PERM. CAPACITY W/IMPACT
ELEMENTARY	3,363	5,300	63%	5,389	102%
MIDDLE	1,763	1,904	93%	2,788	146%
HIGH	1,721	2,041	84%	2,969	145%

The above analysis indicates that one elementary school, one middle school and one high school will be needed in the planning area to meet the projected student population in 2035.

The 2011 Growth Management Law allows capacity to be calculated on a district wide basis rather than just a planning area. The following table provides the district wide analysis.

SCHOOLS – DISTRICT WIDE	FY 2020 PROJECTED ENROLLMENT*	TOTAL EXISTING & PLANNED CAPACITY THROUGH FY 2015	STUDENTS GENERATED	2035 STUDENT ENROLLMENT W/IMPACT	% OF PERM. CAPACITY W/IMPACT
ELEMENTARY	21,826	19,157	2,026	23,852	125%
MIDDLE	10,696	10,718	1,025	11,721	110%
HIGH	13,051	13,418	1,248	14,299	107%

* The FY 2020 projected enrollment has been revised to deduct the City of Leesburg FY 2020 projected students because they have been included within the students generated column.

As previously noted, the City in cooperation with Lake County coordinated with the school board in regards to future growth and provided that data to the school board through 2030. The adopted Five Year Facilities Master Plan FY 2012-2018 (See attached) includes a ten and twenty year plan which includes the City of Leesburg's anticipated growth (Table 6A, Table 6-2, and Table 6-4). Table 6-2 identifies the recommended additional capacity through 2020/21 and indicates a new elementary school in the Leesburg area and Table 6-4 identifies the recommended additional capacity through 2030/31 and indicates a new middle and high school in the Leesburg area. Population projections through the year 2035 have also been provided to the school board earlier this year. The City in cooperation with Lake County and the school board has already addressed the projected population and school impacts of this proposed comprehensive plan amendment. Steps are already being taken to plan and provide the necessary facilities. In addition, the City will ensure that school concurrency is enforced within their jurisdiction as outlined in the comprehensive plan and Interlocal Agreement; therefore, no additional policies are required.

Should you have any questions, please contact our office.

Sincerely,

Greg A. Beliveau, AICP

Cc: Bill Wiley, Leesburg
Ray Eubanks, DEO
Caroline Knight, DEO
Harry Fix, LCS

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