

From: [Hoyland, Michelle](#)
To: [Alvarez, Amy](#); [Gianniotes, Anthea](#)
Subject: FW: City of Delray Beach, DEO #19-1ESR Comments on Proposed Comprehensive Plan Amendment Package
Date: Friday, October 11, 2019 3:04:47 PM

FYI – Forwarding you an email from SFWMD re: their Comprehensive Plan comments.

Regards,

Michelle Hoyland
Principal Planner, Historic Preservation

City of Delray Beach
Development Services Department
100 NW 1st Avenue
Delray Beach, FL 33444
561-243-7039
561-243-7221 (fax)
hoylandm@mydelraybeach.com
www.mydelraybeach.com

From: Oblaczynski, Deborah <doblaczy@sfwmd.gov>
Sent: Friday, October 11, 2019 9:49 AM
To: Hoyland, Michelle <HoylandM@mydelraybeach.com>
Cc: Corvin, Kelly D. <Kelly.Corvin@deo.myflorida.com>; Stephanie Heidt (sheidt@tcrpc.org) <sheidt@tcrpc.org>; tlanahan@tcrpc.org; Eubanks, Ray <Ray.Eubanks@deo.myflorida.com>; DCPexternalagencycomments@deo.myflorida.com
Subject: City of Delray Beach, DEO #19-1ESR Comments on Proposed Comprehensive Plan Amendment Package

Dear Ms. Hoyland:

The South Florida Water Management District (District) has completed its review of the proposed amendment package from the City of Delray Beach (City). The amendment package replaces the current adopted Comprehensive Plan in its entirety with the Always Delray Comprehensive Plan (Plan). The District provides the following comments under Section 163.3184(3)(4)(g) Florida Statutes (F.S.). The important state resource impacted by this amendment is regional water supply. These comments need to be addressed before final adoption of this amendment. If these comments are not addressed prior to adoption, the District may recommend the state land planning agency, the Department of Economic Opportunity, challenge the amendment:

- Revise the proposed amendment to ensure the population projections in the Plan are consistent throughout all of the Elements in the Plan and the supporting documents. The population projections need to be consistent throughout the Plan, the Data, Information and Analysis (DIA), and the Water Supply Facilities Work Plan Update (Work Plan).

At this time, the City has not updated the Work Plan. The Work Plan referenced in the proposed Plan is the City's 2015 Work Plan which is not consistent with the City's new population projections and the 2018 Lower East Coast Water Supply Plan Update. Provide an update to the City's Work Plan to be consistent with the Always Delray Plan and the 2018 Lower East Coast Water Supply Plan Update.

The City is required to revise its Water Supply Facilities Work Plan (Work Plan) within 18 months after approval of the Lower East Coast (LEC) Water Supply Plan Update by the District's Governing Board. The District's Governing Board approved the LEC Water Supply Plan Update on November 8, 2018. The Work Plan must cover at least a 10-year planning period, include updated water demand projections, identify alternative and traditional water supply projects, and describe conservation and reuse activities needed to meet the projected future demands. The Work Plan Update must be consistent with the other sections of the Plan, including the population projections and water demands. Planning tools are available on the District's website for your use and District Staff are available to provide technical assistance to update the Work Plan, including reviewing draft Work Plans prior to formal plan amendment submittal. The planning tools are located at this link: <https://www.sfwmd.gov/doing-business-with-us/work-plans>.

- Provide a density analysis determining changes in land use density and intensity from the current adopted plan to the proposed Plan. The analysis needs to show the potential increase/decrease in density and intensity and potential impact to public facilities.
- Include a water demand analysis showing the impact of the updates to population and density/intensity standards on water supply.
- Update Policies PFE 2.1.5 and PFE 2.1.6 to adopt an updated Work Plan by reference as required in Section 163.3177(1)(b) F.S. The Statute states: "The reference must identify the title and author of the document and indicate clearly what provisions and edition of the document is being adopted." The District provides the following example draft policy for use by local governments in adopting Work Plans by reference:

"[The Local Government] hereby adopts by reference the Water Supply Facilities Work Plan (Work Plan), dated xxxx, for a planning period of not less than 10 years. The Work Plan addresses issues that pertain to water supply facilities and requirements needed to serve current and future development within the [Local Government's] water service area. [The Local Government] shall review and update the Work Plan at least every five (5) years within 18 months after the governing board of the water management district approves an updated regional water supply plan. Any changes affecting the Work Plan shall be included in the annual Capital Improvements Plan update to ensure consistency between the Work Plan and the Capital

Improvements Element.”

- Update Policy PFE 2.2.3 to address potable water concurrency as required in Section 163.3180(2) F.S. The Plan needs to clearly indicate that needed facilities, including potable water, *“shall be in place and available to serve new development no later than the issuance by the local government of a certificate of occupancy or its functional equivalent.”*
- Revise Policies PFE 2.1.7 and PFE 3.2.1 to reference the Ocean Outfall Law Section 403.086 F.S.
- Revise or delete Conservation Policy CSR 2.5.1. The policy requires the City to adopt the 2015 Work Plan by reference. The adoption of the Work is addressed in other policies.
- Update references to the Lower East Coast Water Supply Plan to reference by title the current “2018 Lower East Coast Water Supply Plan Update.”

The District offers its technical assistance to the City in developing sound, sustainable solutions to meet the City’s future water supply needs and to protect the region’s water resources. Please forward a copy of the adopted amendments to the District. Please contact me if you need assistance or additional information.

Sincerely,

Deb Oblaczynski
Policy & Planning Analyst
Water Supply Implementation Unit
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, FL 33406
(561) 682-2544 or email: doblaczy@sfwmd.gov