

# FLORIDA DEPARTMENT OF EDUCATION



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June 3, 2010

Mr. D. Ray Eubanks, Plan Processing Administrator  
Division of Community Planning  
Department of Community Affairs  
2555 Shumard Oak Boulevard  
Tallahassee, Florida 32399-2100

Dear Mr. Eubanks:

Re: Martin County 10-1 (proposed)

Thank you for the opportunity to review Martin County's proposed comprehensive plan amendment package, which includes several future land use map amendments that would increase residential density. The Department offers the following amendment-specific and technical comments for consideration by the Department of Community Affairs.

1. **Amendment 10-9 (Canopus Sound).** – The county proposes amendment of the future land use map, subject to a development agreement, to entitle development of up to 270 dwelling units. The amendment is not supported by data and analysis to demonstrate adopted level of service standards for public school facilities in the affected school concurrency service area will be maintained. To support the amendment, the county in collaboration with the Martin County School District, must provide an analysis of the amendment based on best available data for existing and planned facility capacity and estimates of future enrollment for the end of the five-year planning period. The analysis must be based on maximum residential potential (based on current policies of the plan or as limited by site-specific policies related to the affected parcels). Should the analysis reveal capacity deficiencies, the county and school district must provide a financially feasible plan to correct the deficiencies as part of the adopted amendment package.
2. **Technical Comments.** – The county provides comprehensive staff reports with analysis of proposed amendments that greatly facilitate state agency review. With a minor modification, the staff reports would prove even more helpful to agency reviewers: revise Item 1, Physical/Site Summary to identify the affected school concurrency service area

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(or in the alternative, request the applicant provide that information on the school impact worksheet as part of the application). The staff report for application 10-10 included the summary of school impacts under the heading, “2.5.2 Non-mandatory Facilities.” Because public school facilities are subject to the concurrency requirement, the county should ensure that all future staff reports include the school impact summary under the “2.5.1 Mandatory Facilities.”

In addition, according to the “School Planning and Coordination” webpage posted by the Department of Community Affairs, the analysis of a proposed future land use map amendment on public school level of service standards must evaluate the impacts based on projected capacity and enrollment at the end of the five-year planning period (unless a the county proposes a longer phasing plan for the residential development). The county and school district provided analyses based on current enrollment and capacity expected within three years. While that method is appropriate for a school concurrency review (implementation of planning), the adequate capacity review necessary to support a plan amendment must use at least the current five-year planning period. I encourage the county and school district staff to review the guidance and examples samples provided on the website under the heading, “General Information Needed for Submittals of Future Land Use Map Amendments That Impact School Concurrency found at: <http://www.dca.state.fl.us/fdcp/dcp/SchoolPlanning/index.cfm>.

Again, the Department appreciates the opportunity to comment and would be pleased to make Department staff available to assist the county in responding to these comments.

Sincerely,



Tracy D. Suber  
Educational Consultant-Growth Management Liaison

TDS/

cc: Ms. J. Lisle Bozeman, Martin County School District  
Ms. Laura Regalado, DCA