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October 4, 2012

Ms. Lisa Walsh, AICP, Senior Planner/GIS Analyst
City of Ocala Growth Management Department
201 SE 3rd Street, Second Floor
Ocala, Florida 34471
Via E-mail: lwalsh@ocalafl.org

Dear M. Walsh:

Re: Ocala 12-3ESR

Thank you for the opportunity to review the Ocala 12-3ESR amendment package, which the Florida Department of Education received on September 4, 2012. According to the department's responsibilities under Section 163.3184(3), Florida Statutes, I reviewed the amendment considering provisions of Chapter 163, Part II, F.S., and to determine whether the proposal, if adopted, would have potential to create adverse impacts on public school facilities.

The package applies recommendations of the recent Ocala 2035 Vision and the West Ocala Community Plan to the city's comprehensive plan and includes deletion of the public school facilities element. Among the revisions that relate to public school facilities are text amendments that would have the effect of increasing residential density; removing existing future land use element policies that implement school siting requirements; and rescinding school concurrency. Amendments that rescind school concurrency are not subject to state review. Therefore, the department's comments on the amendment package are limited to the proposed residential density increase and removal of school siting policies and are as follows:

Residential Density

1. Planning coordination. The proposed amendments are not supported with data and analysis to evidence coordination with the Marion County school district pursuant to the Community Planning Act, the city's Intergovernmental Coordination Element (ICE), and the Second Amended and Restated Interlocal Agreement for Public School Facility Planning and School

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School Siting

3. Section 163.3177(6)(a)7., F.S., requires the future land use element (FLUE) to clearly identify the land use categories in which public schools are an allowable use, include in those categories sufficient land proximate to residential development to meet projected needs for schools, and include lands contiguous to existing school sites within the categories in which public schools are an allowable use. Previously, the city met the statutory school siting requirements through FLUE policy 1.1.12, FLUE Objective 11 and associated policies, public school facilities element policy 3.5, and the future land use map. The proposed amendment package would remove these policies and amend the map and does not propose new FLUE policies that would clearly address the statutory requirement. For example, while the proposed high intensity, medium intensity, low intensity, and neighborhood categories permit public and institutional uses, and while the public category allows for use of publicly-owned lands primarily for recreational and civic use, the proposed policies do not describe public, institutional, or civic uses as including public educational facilities.

   Because additional elementary school capacity will be needed within the plan's timeframe, the city should collaborate with the Marion County school district to determine the amount of land likely to be needed for future school sites, revise its proposed FLUE policies to clearly identify land use categories in which public schools would be permitted, and ensure that the areas as designated on the future land use map include sufficient land area to meet the need for new school uses.

As a final note, the rescission of school concurrency does not relieve the city from the requirement that a plan amendment proposing a residential density increase demonstrate that existing or planned school capacity is sufficient to meet the increased demand [see sections 163.3167(6)(a) 2.d., 163.3177.(6)(a)3.d., 163.3177(6)(a)7. and 8. a., 163.3177(6)(a)10.a.(VII), and 163.31777, F.S.]. As the city has done in the past, and consistent with the interlocal agreement, please continue to work with the Marion County school district to obtain the necessary analysis and include the analysis with the supporting data and analysis for the amendment. Because the law requires it, I will continue to review all plan amendments for effects on the capacity of public school facilities, including evidence of coordination with the school district pursuant to the interlocal agreement, and if an amendment is near a school or school site, for land use compatibility with school uses.

Should the city, district school board, Marion County, and other municipalities within the county execute a revised interlocal agreement that reflects the city's rescission of school concurrency, I would appreciate receiving a copy of the revised agreement to update and complete the department's records. The revised agreement is not required to be submitted for state review but having a copy on file would be helpful in understanding local conditions and the review of future plan amendments.

Again, thank you for your assistance in providing additional information to aid in the review of the proposed amendment. I am available to provide technical assistance to the staffs of the city and the

Marion County School District Adequate Capacity Analysis for Plan Amendment

Amendment/Project Identifier: 12-3ESR (2035 Population Estimate Assumption)

Multiplier (per PFSE data and analysis document)

	ES	MS	HS	
SF	0.158	0.078	0.092	0.328
MF	0.097	0.040	0.043	

Development Program	Max Dev Potential Dus*	Students			Total	
SF development	3,701	585	289	340	1,214	* Pop growth of 13,728 /2.3 PPH = 5,969
MF units **	2,268	220	91	98	408	**38% split based on American Community Survey
	5,969	805	379	438	1,622	
Previously approved impacts						
Estimated Vested Impacts (5 yrs)		0			0	Not provided
Reserved Impacts		0			0	
total		0	0	0	0	

Impacts
End of Five Year Planning Period (Source: Marion County School Board 2012-13 District Work Plan)

School/CSA	2016-17 Capacity	2016-17 Enrollment	Dev Prgm Impacts	Prev Appvl Impact	Enr w/ Impacts	Resulting LOS	LOS Standard	LOSS Met?	Capital Plans
Elementary									
College Park	784	783							
Eighth Street	348	326							
Evergreen	750	549							
Fessenden	464	455							
Maplewood	793	632							
Oakcrest	813	987							
Ocala Springs	564	614							
Saddlewood	816	937							
South Ocala	728	683							
Ward Highlands	831	704							
Wyomina Park	456	562							
	7,347	7,232	805	-	8,037	109%	100%	No	See note 1
		115	=	728	SF DUs remaining to 0 available capacity				
Middle									
Osceola	850	868							
Liberty	1,177	1,199							
Howard	1,562	996							
Fort King	1,290	1,245							
	4,879	4,308	379		4,687	96%	100%	Yes	See note 1
		571	=	7,321	SF DUs remaining to 0 available capacity				
High School									
Vanguard	1,831	1,783							
Forest	2,276	2,089							
West Port	2,452	1,933		-					
	6,559	5,805	438	-	6,243	95%	100%	Yes	See note 1
		754	=	8,196	SF DUs remaining to 0 available capacity				

Note 1: The district's approved facilities work plan (2012-13) does not include additional capacity in the 10- or 20-year periods.

Marion County School District Adequate Capacity Analysis for Plan Amendment

Amendment/Project Identifier: 12-3ESR (FDOE Buildout Assumption w/SF-MF mix)

Multiplier (per 2011 data and analysis document)

	ES	MS	HS
SF	0.158	0.078	0.092
MF	0.097	0.040	0.043

Development Program	Theoretical Max Dev Potential Dus*	Students			Total
SF development**	34,741	5,489	2,710	3,196	11,395
MF units ***	67,609	6,558	2,704	2,907	12,170
	102,350	12,047	5,414	6,103	23,565

*30% of lands for residential use

**62% at SF density (5 du/acre)

***38% split based on American Community Survey

Previously approved impacts

Estimated Vested Impacts (5 yrs)	-			-
Reserved Impacts	-			-
total	-	-	-	-

Impacts

End of Five Year Planning Period (Source: Marion County School Board 2012-13 District Work Plan)

School/CSA	2016-17 Capacity	2016-17 Enrollment	Dev Prgm Impacts	Prev Appvl Impact	Enr w/ Impacts	Resulting LOS	LOS Standard	LOSS Met?	Capital Plans
Elementary									
College Park	784	783							
Eighth Street	348	326							
Evergreen	750	549							
Fessenden	464	455							
Maplewood	793	632							
Oakcrest	813	987							
Ocala Springs	564	614							
Saddlewood	816	937							
South Ocala	728	683							
Ward Highlands	831	704							
Wyomina Park	456	562							
	7,347	7,232	12,047	-	19,279	262%	100%	No	See note 1
		115	=	728	SF DUs remaining to 0 available capacity				
Middle									
Osceola	850	868							
Liberty	1,177	1,199							
Howard	1,562	996							
Fort King	1,290	1,245							
	4,879	4,308	5,414	-	9,722	199%	100%	No	See note 1
		571	=	7,321	SF DUs remaining to 0 available capacity				
High School									
Vanguard	1,831	1,783							
Forest	2,276	2,089							
West Port	2,452	1,933		-					
	6,559	5,805	6,103	-	11,908	182%	100%	No	See note 1
		754	=	8,196	SF DUs remaining to 0 available capacity				

Note 1: The district's approved facilities work plan (2012-13) does not include additional capacity in the 10- or 20-year periods.