

**CITY OF DUNNELLO**  
**COMPREHENSIVE PLAN**



**VOLUME I**

**SUPPLEMENTAL  
DATA AND ANALYSIS**

## 1. Dunnellon Comprehensive Plan Update Process

The Dunnellon Comprehensive Plan consists of two volumes. Volume I is the technical support document, which consists of data, maps and related analysis to support the adoption of goals, objectives and policies. Volume I is not an adopted component of the Dunnellon Comprehensive Plan. Volume II consists of the goals, objectives and policies, the future land use map series and the future transportation map. Volume II is the adopted component of the Dunnellon Comprehensive Plan and must be amended by adoption of an ordinance pursuant to the notice requirements and procedures set forth in Section 163.3184, Florida Statutes.

The City of Dunnellon initially adopted Volume II of the Dunnellon Comprehensive Plan in 1991 and has adopted numerous amendments to the adopted Comprehensive Plan from 1992 through 2015. In order to provide a more user-friendly document for City officials and the community, the City of Dunnellon undertook an administrative exercise in 2015 to consolidate all the various comprehensive plan amendments into a single document, referred to as the Consolidated Comprehensive Plan. Utilizing grant funding provided by the Florida Department of Economic Opportunity (DEO), the City retained a consultant, Stearns Weaver Miller Weissler, Alhadeff & Sitterson, P.A. (Stearns Weaver), to conduct the research required to consolidate the previously adopted comprehensive plan amendments into a single, integrated, consolidated Volume II. Stearns Weaver held an informal workshop with the Dunnellon City Council on December 9, 2015 to review the consolidation process. As noted at the workshop, the administrative exercise to consolidate Volume II did not make any changes to the adopted components of Volume II. The Consolidated Comprehensive Plan was submitted to the City in December 2015 and is posted on the City's website.

The DEO grant (**Appendix A.1**) also calls for the City to prepare comprehensive plan amendments to update Volume II (adopted component) based on statutory changes. This update process is described by Section 163.3191, Florida Statutes, which requires that local governments evaluate the comprehensive plan periodically to determine whether amendments are necessary in response to statutory changes. Local governments must submit a letter to DEO, confirming whether the local government intends to amend its comprehensive plan based on its evaluation. The City of Dunnellon submitted a letter, dated November 19, 2014 to DEO, confirming its intent to adopt comprehensive plan amendments to update the comprehensive plan. This letter is referred to as an Evaluation Notice Letter (**Appendix A.2**). The DEO grant references the Evaluation Notice Letter and calls for the City to:

- Revise the Evaluation Notice letter to further refine the scope of comprehensive plan amendments that will be adopted in response to statutory changes. The revised Evaluation Notice letter was submitted to DEO on February 4, 2016.
- Prepare comprehensive plan amendments (Volume II) based on the proposed changes listed in the Evaluation Notice letter, which is sometimes referred as an

Evaluation and Appraisal Report (EAR). These types of comprehensive plan amendments are referred to as EAR-based comprehensive plan amendments because they are based on the Evaluation Notice letter.

- Prepare supplemental data and analysis (Volume I) to support the proposed Volume II comprehensive plan amendments.

Based on the DEO grant, Stearns Weaver has prepared each of the required documents. The following schedule summarizes the update process based on the terms of the grant:

- DEO Grant executed on **September 29, 2015**.
- Stearns Weaver prepared Consolidated Dunnellon Comprehensive Plan. Again, this was a reformatting exercise and did not make any changes to the adopted text and maps of the Dunnellon Comprehensive Plan. However, the Future Land Use map series was modernized using Geographic Information Systems (GIS) software.
- City Council workshop held on **December 9, 2015** to review the grant process. (See **Appendix A.3** for documentation on workshop).
- Consolidated Comprehensive Plan submitted to the City on December 22, 2015.
- Stearns Weaver prepared the draft Volume II amendments and draft Volume I Supplement (this document).
- Planning Commission (Local Planning Agency) public hearing to be held on February 19, 2016 to review the Volume I Supplement (this document) and proposed Volume II amendments, obtain public input and provide recommendations to the City Council.
- City Council “transmittal” public hearing to be held on March 4, 2016. This is a public hearing to review the Volume I Supplement (this document) and proposed Volume II amendments, obtain public input, consider the recommendations of the Local Planning Agency and vote on whether to transmit the proposed Volume I Supplement and Volume II amendments to DEO for state review as required by s. 163.3184(4), Florida Statutes.
- If the City Council votes to transmit the proposed comprehensive plan amendments, staff will prepare the package and transmit the Volume I Supplement and proposed Volume II amendments to DEO for review.
- DEO will conduct the “State Coordinated Review” process, which requires that DEO obtain comments from the various review agencies listed in s. 163.3184(2), Florida Statutes, and then DEO will either issue a letter transmitting an *Objections, Recommendations and Comments Report* to the City or a letter indicating that it has no comments on the proposed amendments. DEO has up to 60 days to issue its letter following receipt of the transmitted package from the City.
- Section 163.3184, F.S., allows the City up to 180 days following its receipt of the DEO letter to adopt the proposed Volume II amendments.

## **1.1 Statutory Framework Governing Comprehensive Planning**

Chapter 163, Part II, Florida Statutes, requires that local governments in Florida adopt a comprehensive plan in order to guide planning, growth and development within the community. This statutory requirement was enacted in 1985 as the Local Government Comprehensive Planning and Land Development Regulation Act (1985 Act). The Legislature substantially amended Chapter 163, Part II, in 2011 by passage of House Bill No. 7207 (Chapter 2011-139, Laws of Florida), which changed the title to the *Community Planning Act* and incorporated several new concepts as further discussed in this Volume I. In addition, HB 7207 repealed Rule 9J-5, Florida Administrative Code (F.A.C.). This was the administrative rule adopted in conjunction with the 1985 Act to further define the content requirements for comprehensive plans. Based on the passage of the Community Planning Act and the repeal of Rule 9J-5, F.A.C., the minimum content requirements for the Dunnellon Comprehensive Plan are now governed only by the Community Planning Act.

The Community Planning Act made significant changes to Chapter 163, Part II, relating to both procedural and substantive content requirements for comprehensive plans. Many of the procedural changes relate to the State’s review process and the procedures for affected parties to challenge comprehensive plan amendments. Those procedural changes don’t generally affect how the local government prepares and adopts comprehensive plan amendments, except for the evaluation and updated process as previously reviewed. The substantive content changes are generally intended to grant local governments more discretion in planning for community needs and supporting economic development. These changes include:

- Discretion to not adopt concurrency for transportation and schools;
- Flexibility to address capital improvement planning and financial feasibility requirements beyond five years;
- Ability to define the land use “needs” of the community from a broader economic development perspective rather than strictly based on historic demand levels; and
- Simplified criteria for determining whether comprehensive plan amendments discourage urban sprawl.

This Volume I Supplement further explains these policy options. In that regard, the Community Planning Act maintains the important role of the Dunnellon Comprehensive Plan as a policy setting document. As the Courts have described, the comprehensive plan is akin to the community’s “constitution” for planning for the future growth of the community. In Florida, the comprehensive plan is elevated in terms of its legal status and enforceability. Importantly, the Community Planning Act does not change that fundamental requirement in Chapter 163, Part II, known as the “consistency” requirements:

Section 163.3194 requires that all development and development orders must be consistent with the adopted local government comprehensive plan; and

Section 163.3202 requires that local governments must adopt land development regulations that are “consistent with and implement their adopted comprehensive plan.”

The Dunnellon Comprehensive Plan remains an important public policy document to guide further growth, and it retains its legal status as described above under the Community Planning Act.

## **1.2 Overview of Volume I Supplement**

This Volume 1 Supplement provides updated data, maps and analysis to support the proposed comprehensive plan amendments as set forth in Volume II. The current Volume I was prepared in 1991 in support of the initial adoption of Volume II in 1991. The City has also periodically prepared data and analysis for various comprehensive plan amendments adopted over the past 25 years. At this point, most of these data sets and related analyses are now outdated, and technological advancements, such as GIS spatial analysis, allow for more accurate and various types of analysis. This Volume I Supplement provides additional data sets and related analysis to the extent appropriate to support the proposed comprehensive plan amendments set forth for Volume II. As such, this is a supplement and does not comprehensively revise Volume 1. It is anticipated that another round of grant funding may provide support to undertake a comprehensive update of Volume 1 and additional revisions to Volume II to address policies issues that are considered high priority, such as riverine protection, but were not identified as EAR-based amendments based on statutory changes.

This Volume I Supplement includes the following updates:

### Future Land Use Element

- Revised population and seasonal projections and housing projections;
- Revised existing conditions data sets and maps;
- Revised vacant land analysis;
- Evaluation of land use needs based on the updated population projections and vacant land analysis;
- Evaluation of revised statutory criteria and basis for proposed policy revisions;
- Evaluation of revised statutory criteria for discouraging urban sprawl and applicability to Dunnellon and basis for proposed policy revisions;
- Evaluation of airport compatibility criteria set forth in statute and basis for proposed policy revision;

### Transportation Element

- Revised data sets providing roadway characteristics;
- Revised data sets providing existing and projected level of service conditions on roadways based on the Marion County Transportation Planning Organization 2035 Long Range Transportation Plan;
- Revised transportation maps showing existing and projected conditions;

### Housing Element

- Revised housing need projections;
- Revised census data sets;

### Public Facilities Element

- Revised data sets describing existing and planned water and sewer facilities based on the 2012 Water and Sewer Master Plan;
- Evaluation of Public Facilities Elements and proposed consolidation;

### Conservation Element

- Revised habitat maps;
- Revised data sets providing updated habitat acreages;

### Recreation and Open Space Element

- Revised parks inventory;
- Revised data sets providing existing and projected level of service conditions;

### Capital Improvements Element

- Revised tables summarizing LOS standards;
- Revised financial feasibility analysis;
- Revised 5-Year Capital Improvements Schedule.

## 2. Supporting Data and Analysis

Chapter 163, Part II, includes several general requirements regarding data and analysis as related to comprehensive plans and plan amendments:

- Section 163.3177(1)(f) states that plan amendments shall be based upon relevant and appropriate data and analysis available at the time of adoption and may rely on surveys, studies and similar types of data;
- Section 163.3177(1)(f) states that to be “based on data” means to “react to it an appropriate way and to the extent necessary indicated by the data...”
- Section 163.3177(1)(f) was amended by the Community Planning Act to also specify that that “community goals and vision” are appropriate data to be considered;
- Section 163.3177(1)(f)1 states that data “may not be deemed a part of the comprehensive plan unless adopted as part of it,” and that data are not subject to the compliance review, but shall be utilized as an aid in determining compliance and consistency between elements;
- Section 163.3177(2) states that data must be taken from professionally accepted sources and that methodologies must be “professionally accepted”; and
- Section 163.3177(2) emphasizes that coordination of the elements shall be a major objective of the planning process and that consistent data shall be used for the elements;

The data and analyses prepared for the proposed comprehensive plan amendments are consistent with these general requirements. As previously noted, the previous effort under the grant to integrate and consolidate the originally adopted comprehensive plan and the comprehensive plan amendments applied only to Volume II, which is the adopted part of the comprehensive plan. Like nearly all local governments in Florida, Dunnellon originally adopted only the goals, objectives and policies, the related future land use map series and the future transportation map, and adopted plan amendments only to Volume II. This is appropriate, as compliance is determined based on only the adopted Volume II, and this approach allows Dunnellon to update the supporting data and analysis as needed whether a plan amendment is proposed or not. However, when plan amendments are proposed, then the supporting data and analysis must be submitted to the review agencies along with the proposed plan amendment.

**Recommendation:** Based on review of the City’s previous adoption ordinances, the following recommendations are provided:

- Ordinances should always reference the “adoption” of Volume II comprehensive plan amendments, while referencing “approval” of supporting data and analysis. This will avoid any confusion regarding the scope of the adopted plan amendment.
- Ordinances should always include the adopted component as one distinct exhibit, and the supporting data and analysis as a different exhibit.

- One copy of the ordinance should be maintained in City records with the exhibits attached.

The statute also specifies data and analysis requirements for each element of the Comprehensive Plan. The following data summaries and related analysis are presented by element. The elements requiring the most significant supplemental data and analysis for the proposed EAR-based Comprehensive Plan Amendments are the Future Land Use Element, Transportation Element and Infrastructure Element.

## **2.1 Future Land Use Element**

The Future Land Use Element defines land use policy for Dunnellon in terms of the location, intensity and form of development within the City. As such, it guides the physical development of the City, and should reflect the community's vision of how it would like to grow and develop. It can also be considered the organizing element, which ties all of the other elements together to provide a coherent policy framework; that is, to ensure that the City's vision, planning and development strategies are consistent across all of the elements as required by the statute and good planning in general. This means that the Transportation, Infrastructure and Capital Improvements elements should support the Future Land Use Element by directing improvements in a manner that is consistent with the planned densities and intensities set forth in the Future Land Use Element. Equally important, the future land use categories should direct growth and control densities and intensities in a manner that implements policy direction from the Conservation element to protect natural resources.

### **2.1.1 Planning Periods**

Section 163.3177(5)(a) requires that:

Each local government comprehensive plan must include at least two planning periods, one covering at least the first 5-year period occurring after the plan's adoption and one covering at least a 10-year period.

Proposed FLUE Policy 6.1 defines the short term (5-year) and long term (approximately 20 years) planning periods with an allowance for adjusting the long range year to conform to decade or mid-decade years to ensure greater consistency with various agency plans. The plan amendment update establishes 2035 as the long range plan horizon, which is a 19-year planning period, assuming adoption in 2016.

## 2.1.2 Population Projections

Section 163.3177(1)(f)3 requires that:

The comprehensive plan shall be based upon permanent and seasonal population estimates and projections, which shall either be those published by the Office of Economic and Demographic Research or generated by the local government based upon a professionally acceptable methodology. The plan must be based on at least the minimum amount of land required to accommodate the medium projections as published by the Office of Economic and Demographic Research for at least a 10-year planning... Absent physical limitations on population growth, population projections for each municipality and the unincorporated area within a county must, at a minimum, be reflective of each area's proportional share of the total county population and the total county population growth.

The Office of Economic and Demographic Research (EDR) publishes population estimates and population projections at the County level. EDR does not publish population projections for cities. The methodology utilized for preparing the Dunnellon population projections utilizes the EDR population projections for Marion County as a starting point and then evaluates two scenarios for forecasting the City's share of countywide population growth.

Scenario 1. This scenario forecasts that the City's population will continue to increase in a manner generally similar to historic growth trends. The City's population growth was relatively linear from 1970 through 2000, but that trend changed from 2000 to 2010 as shown by Table 1. The City's population declined by 165 persons from 2000 to 2010 as compared to increases ranging from 197 to 274 in the previous two decades. This recent downward trend makes population projections based on trend growth inherently challenging, given that the City has not experienced consistent linear growth. The obvious question in projecting population is whether the City will continue to experience population loss, rebound to its pre-2000 moderate growth rates, or experience even higher growth rates.

**Table 1. Dunnellon Long Term Population Trend and Share of Countywide Population**

	1970	1980	1990	2000	2010
Dunnellon	1,146	1,427	1,624	1,898	1,733
Marion County	69,030	122,488	194,833	258,916	331,298
Dunnellon Share of Countywide Population	1.66%	1.17%	0.83%	0.73%	0.52%
Dunnellon Population Change from Previous Census		281	197	274	-165
Dunnellon Share of Population Growth from Previous Census		0.53%	0.27%	0.43%	0%

Source: US Census

As Table 1 indicates, Dunnellon’s share of countywide population has declined over time as would be expected due to the more intensive growth occurring in the suburban areas surrounding Ocala. However the 2000-2010 population loss in Dunnellon resulted in a much lower share at .52% than would be expected based on the trend from 1980 to 2000, particular recognizing that the City’s share declined by only .1 percentage point from 1990 to 2000. If this trend had continued through 2000-2010, the City share would have been closer to .63.

**Table 2. Dunnellon Share of Countywide Population: 2010-2014 (EDR Estimate)**

	<b>April 1, 2010</b>	<b>July 1, 2011</b>	<b>July 1, 2012</b>	<b>July 1, 2013</b>	<b>July 1, 2014</b>	<b>July 1, 2015</b>
Dunnellon	1,733	1,737	1,740	1,754	1,770	1,771
Marion County	331,298	331,745	332,989	335,008	337,455	341,205
Dunnellon Share of Countywide Pop.	0.52%	0.52%	0.52%	0.52%	0.52%	0.52%
Dunnellon Share of Countywide Population Growth 2010-2015 = .38%						

*Source: EDR Population Estimates*

Table 2 shows EDR’s population estimates for Dunnellon and Marion County for 2011-2015, following the April 1, 2010 census population figures. EDRs population estimates are based on review of building permit records, utility information and homestead exemptions to estimate the number of permanently occupied housing units from 2010 to 2015. EDR then applies the persons per household rate from the 2010 census to estimate the population of those households. This figure is then added to the 2010 population to estimate the population for years 2011-2015. The US Census Population Estimates program also utilizes building records but not utility records or homestead exemption. Instead, the US Census obtains permit records from 2010 to 2014, assumes a 6 month period between issuance of a permit and final construction and assumes a certain rate of housing loss based on the age of the housing stock to estimate constructed housing from 2010 to 2014. Both of these statistics (time lag and housing loss) are from national surveys. The 2010-2014 housing estimate is then added to the 2010 housing count to obtain 2014 housing. It then applies the occupancy rate and persons per household data from the 2010 census to obtain the 2014 uncontrolled population, which is then adjusted for all cities and subareas on a proportionate basis to match the control total population of the County. Both the Census and the EDR also account for population in group quarters, but this is not a factor in Dunnellon.

Table 3 provides the US Census Estimates, which are available only through 2014, and are for July 1 of each year.

**Table 3. Dunnellon Share of Countywide Population: 2010-2014 (Census Estimate)**

	<b>April 1, 2010</b>	<b>July 1, 2011</b>	<b>July 1, 2012</b>	<b>July 1, 2013</b>	<b>July 1, 2014</b>
Dunnellon	1,733	1,737	1,745	1,748	1,762
Marion County	331,298	332,507	334,495	336,159	339,167
Dunnellon Share of Countywide Pop.	0.52%	0.52%	0.52%	0.52%	0.52%
Dunnellon Share of Countywide Population Growth 2010-2014 = .37%					

*Source: Census Population Estimates, Vintage 2014 (2015 not available).*

The US Census estimates higher population for Marion County as compared to the EDR population estimates, but slightly lower estimates for the population of Dunnellon. However, the differences are not significant, and result in the same .52% city share of countywide population for each year. In addition, the City’s shares of countywide population growth for the two time periods are comparable at .37% and .36%, respectively.

The 2000-2010 decade was unusual in that tremendous growth occurred followed by the Great Recession. While economic cycles typically occur in each decade, the 2000-2010 decade was more severe than typical. Therefore, it would not be appropriate to forecast a continued reduction in population, given that the economy has recovered. It is more likely that Dunnellon will return to at least the moderate growth experienced during the previous decades. This is supported by several factors affecting population growth. First, EDR projects that Marion County will continue to experience significant population growth. Second, the southwest quadrant of Marion County has experienced significant growth in the vicinity of the City. Third, the City has significant vacant land that is served by central water and sewer.

Occupancy rates account for some of the City’s decline in population during the 2000-2010 decade. Table 4 documents that the vacant rate for existing housing increased from 15.76% in 2000 to 24.57% by 2010. Assuming two persons per household, the additional vacated units accounts for roughly 72 persons.

**Table 4. City of Dunnellon Housing Vacancy Rates (2000, 2010, and 2014)**

	<b>2000</b>	<b>2010</b>	<b>2014</b>	<b>2014 Margin of Error</b>
Occupied	950	878	946	165+/-
Vacant	178	286	369	154+/-
Total	1128	1164	1315	114+/-
% Vacant	15.78%	24.57%	28.06%	

*Source: US Census 2000 and 2010 and American Community Survey (5 Year Survey)*

The 2014 vacancy rate represents the average vacancy rate over a 5-year period (2010-2014). While it indicates an increased vacancy rate as compared to 2010, several points must be considered in understanding the data. The American Community Survey is based on a sample of

the Dunnellon housing, and is subject to sampling error. Thus, in considering the margin of error calculated by the US Census, the vacancy rate would be expected from a statistical perspective to fall within a range from 16.35% to 39.77%. However, as the population estimates provided by EDR and the US Census show population growth during 2010-2014, it is likely that the vacancy rate has declined.

Table 5 also helps to understand the type of vacancy occurring within the City and how that differed in 2000 versus 2010. The vacancy rate in 2010 occurred primarily as a result of a significant increase in vacant rental housing and “other” as compared to the 2000 vacancy. Seasonal vacancy had also declined significantly. Conversely, vacant units resulting from seasonal usage declined, as a percentage of all vacant units, significantly in 2010 versus 2000. Based on the types of vacancy rate, it is reasonable to assume that multifamily occupancy will improve over time.

**Table 5. Vacancy Status**

	2000	Percent	2010	Percent
For rent	26	14.61%	60	20.98%
For sale	16	8.99%	34	11.89%
Rented or Sold, not Occupied	7	3.93%	12	4.20%
Seasonal	98	55.06%	106	37.06%
Other	31	17.42%	74	25.87%
Total	178	100.00%	286	100.00%

Source: US Census 2000 and 2010 and American Community Survey (5 Year Survey)

Based on the preceding analysis, Table 6 presents the moderate growth population projection, which assumes that the City would maintain its .52% share of countywide population from 2015-2035. This forecast is consistent with Section 163.3177(1)(f)3, which requires that population projections “be reflective... of the proportional share of the total county population and the total county population growth.”

**Table 6. Moderate Growth Population Projection**

	2015	2020	2025	2030	2035
Marion County (EDR)	341,205	373,809	405,002	434,725	463,073
Marion County (Census)	Not Available	372,258	401,110	427,129	451,427
Dunnellon Projected Share		0.52%	0.52%	0.52%	0.52%
Dunnellon Projected Population	1,771	1,936	2,086	2,221	2,347
Increase over previous 10 years			315	285	262
Marion County Population Change from Previous Census		42,511	31,193	29,723	28,348
Dunnellon Share of Countywide Population Growth (2015-2035) = .47%					

As shown, the population projections yield absolute growth over ten year periods that is comparable to that experienced during the 1990s. This represents an increase in the City’s capture of countywide growth from .37 % estimated by BEBR to .47%, to be more consistent with the capture of countywide population *growth* as occurred in the 1990’s.

Population Projection Scenario #2.

The second scenario is based on moderate-high growth that could potentially occur if the City were in a position to significantly expand the water and sewer system to serve annexed areas near the airport or future annexed areas. Based on the investment required for maintenance and improvements of the existing system, and the distance required to serve previously annexed or future annexed areas, this scenario is less likely to occur than the moderate growth scenario, particularly in the near future. Table 7 provides the same calculation as the moderate, but increases the capture rate of countywide population growth from .47 to .52 starting in 2020, .53 in 2025 and .54 in 2030.

**Table 7. Moderate-High Population Projection**

	2015	2020	2025	2030	2035
Marion County (EDR)	341,205	373,809	405,002	434,725	463,073
Marion County (Census)	Not Available	372,258	401,110	427,129	451,427
Dunnellon Projected Share		0.5200%	0.5200%	0.5188%	0.5201%
Dunnellon Projected Population	1,771	1,936	2,098	2,255	2,409
Marion County Population Change from Previous Census		373,809	31,193	29,723	28,348

It is important to recognize that population projections are inherently subject to some degree of “error” as compared to actual population growth. This is particularly true for small area projections, where a consistent trend has not occurred. Growth will be influenced by many factors, including the policy decisions of the City, Marion County, the TPO, FDOT and other agencies. The TPO has US 41 from S.W. 111<sup>th</sup> Place to SR 40 programmed for widening to four lanes by 2020. This will make the area more attractive for growth in general, as households make decisions to move in part on the trade-off between commuting distance versus the lower cost of land. Households also consider other factors, including the quality of schools and neighborhoods. Spillover growth can also occur from other counties, such as Citrus County. These projections result in a range that is reasonable, given the circumstances. However, the City should periodically update population projections during the EAR-based amendment process, and a new policy is proposed to implement this recommendation. In addition, the City should continue to monitor trends, including its building permit activity and resulting EDR and Census estimates.

### 2.1.3 Seasonal Population Projections

As indicated by Table 5, the Census documents seasonal housing units, which account for 55% of total vacant units in 2000 and 37% in 2010. While this represents a significant difference as a percentage, the difference is not as significant when compared to the total number of housing units. Seasonal units accounted for 8.69% of all housing units in 2000 and 9.11% in 2010. It is reasonable to assume that seasonal units would be occupied by the same number of persons on average as permanent units. This results in seasonal population calculating to 9.11% of the permanent population based on the 2010 data. Table 8 provides the seasonal population projection based on the moderate and moderate-high population scenarios and applying the factors described above.

**Table 8. Seasonal Population Projections**

	2015	2020	2025	2030	2035
Dunnellon Moderate Projection	1771	1,936	2,086	2,221	2,347
Dunnellon Moderate-High Projection	1771	1,936	2,098	2,255	2,409
Seasonal Moderate Projection	161	176	190	202	214
Seasonal Moderate-High Projection	161	176	191	205	219

### 2.1.4 Existing Conditions

This supplement provides an update on existing land use conditions within the City. This is necessary in order to evaluate the City’s potential to accommodate the projected population and to accommodate other community needs, such as commercial, public uses, and recreational lands. The existing conditions analysis also provides a summary of vacant land conditions to generally determine the relative suitability of lands for development and to show how future land use designations correspond with existing conditions.

The methodology utilizes Geographic Information Systems software to create a Master Data Set (**Appendix A.4** – CD only) that is parcel-based, using the Department of Revenue (DOR) data base, which documents existing land use based on DOR codes (**Appendix A.5**). The Master Data Set provides the following key information for each of parcels in the City based on the DOR records: existing land use, number of structures, number of residential units and non-residential floor area. In addition, the City’s existing water and sewer transmission system was utilized as a GIS layer to identify parcels where water and sewer are available along the frontage of the parcel or within 500’ linear feet of the parcel. 500’ was utilized based on the City’s code, which requires parcels to connect to water and sewer where lines are “available,” which is defined as within 500’ of a parcel. For vacant parcels, the Master Data Set also identifies the existing land use classification based on the Florida Land Use Cover and Classification System (FLUCCS), which classifies vacant land based on habitat type, where applicable. These data sets allow for an analysis of existing conditions to identify vacant and underutilized parcels that are

in the best position to develop during the planning period. The following sections summarize the existing conditions within the City based on these data sets.

#### 2.1.4.1 DOR Classifications

DOR codes classify land use in broad classes, such as residential and commercial, which are further classified into more discreet classifications, such as single family, multifamily, etc., for residential, and retail stores, restaurants, etc., for commercial. Table 9 summarizes the major DOR land use categories by acreage and percentage of total City acreage. Agriculture comprises over 60% of the City total acreage due to the annexations of large tracts. The table provides the percentage breakdown with and without agriculture.

**Table 9. Existing Land Use Based on DOR Codes**

<b>DOR Land Use</b>	<b>Acreage</b>	<b>% (with Agriculture included in total)</b>	<b>% (without including Agriculture)</b>
<b>Residential</b>	<b>527.96</b>	<b>10.11%</b>	<b>26.63%</b>
-Vacant	144.26	27.32% (of Residential)	27.32% (of residential)
-Single Family	315.85	58.82% (of Residential)	58.82% (of residential)
-Multifamily	50.06	9.48% (of Residential)	9.48% (of residential)
-Mobile Home	1.10	.21% (of Residential)	.21% (of residential)
-Other	1.31	.25% (of Residential)	.25% (of residential)
<b>Commercial</b>	<b>207.78</b>	<b>3.98%</b>	<b>10.48%</b>
-Vacant	40.88	19.67% (of Commercial)	19.67% (of Commercial)
Retail/Shopping Center	69.40	33.40% (of Commercial)	33.40% (of Commercial)
Offices	34.46	16.58% (of Commercial)	16.58% (of Commercial)
Services	17.90	8.61% (of Commercial)	8.61% (of Commercial)
Other	45.14	21.72% (of Commercial)	21.72% (of Commercial)
<b>Institutional</b>	<b>50.04</b>	<b>.96%</b>	<b>2.52%</b>
<b>Industrial</b>	<b>1.41</b>	<b>.03%</b>	<b>.07%</b>
<b>Government</b>	<b>1,009.99</b>	<b>19.35%</b>	<b>50.94%</b>
<b>Other</b>	<b>174.51</b>	<b>3.34%</b>	<b>8.80%</b>
<b>Other Vacant</b>	<b>11.13</b>	<b>.21%</b>	<b>.56%</b>
<b>Agriculture</b>	<b>3,237.33</b>	<b>62.02%</b>	<b>N/A</b>
<b>Total Without Agriculture</b>	<b>1,982.81</b>	<b>N/A</b>	<b>100%</b>
<b>Total With Agriculture<sup>1</sup></b>	<b>5,220.14</b>	<b>100%</b>	<b>N/A</b>

1. This figure will deviate slightly from total acreage within corporate boundary due to parcel boundaries not consistently extending to the ordinary high water line.

The far right column confirms that about 78% of the developed portion of the City is comprised of government and residential use, while commercial accounts for about 10%. For more detail, please refer to **Appendix A.6**), which provides a detailed breakdown of DOR use codes and acreage in each category.

The DOR use code provides a good profile of developed land uses, but is not a good data source for evaluating the condition of vacant lands. The DOR codes classify 196.27 acres as vacant, but this figure does not include agriculture, which is classified separately, and does not include open spaces included under Government. In addition, DOR classifies a parcel as developed, even where most of the parcel is undeveloped.

#### 2.1.4.2. FLUCCS

It is appropriate to also consider the FLUCCS designations assigned to property within the City. FLUCCS is a database maintained by the SJRWMD. While the categories do not consistently match DOR classifications, the data provide a more refined analysis of vacant lands.

**Table 10. FLUCCS by FLUM Categories**

<b>DOR Class</b>	<b>Ag/Rural</b>	<b>Res. (low-high)</b>	<b>Comm./Specialized</b>	<b>TN/MU</b>	<b>Cons.</b>	<b>Public</b>	<b>Total Acres</b>	<b>% of Total</b>
Uplands	115.94	415.70	26.80	28.20	17.30	0	<b>603.94</b>	<b>17.63%</b>
Wetlands	28.98	14.83	0	17.62	140.37	0	<b>201.80</b>	<b>5.89%</b>
Agriculture	1,249.04	470.79	178.99	341.91	56.01	1.42	<b>2,298.16</b>	<b>67.09%</b>
Low Intensity Urban	11.54	58.16	15.79	5.80	0	.63	<b>91.92</b>	<b>2.68%</b>
High Intensity Urban	.5	31.29	21.24	11.87	0	.54	<b>65.44</b>	<b>1.91%</b>
Rural	10.84	49.92	16.79	5.67	0	0	<b>83.22</b>	<b>2.43%</b>
Transp., Extractive, Bare Soil	4.89	71.22	2.49	2.01	.24	.08	<b>80.93</b>	<b>2.36%</b>
<b>Total Acres</b>	<b>1421.73</b>	<b>1111.91</b>	<b>262.10</b>	<b>413.08</b>	<b>213.92</b>	<b>2.67</b>	<b>3,425.41</b>	<b>100%</b>
<b>% of Total</b>	<b>41.51%</b>	<b>32.46%</b>	<b>7.65%</b>	<b>12.06%</b>	<b>6.25%</b>	<b>.08%</b>	<b>100%</b>	

For convenience, this table combines certain FLUM categories, such as the residential categories, commercial categories and mixed use categories, which include the Traditional Neighborhood categories. See **Appendix A.7** for a more discreet breakdown. The analysis confirms several important points in considering the development potential based on the FLUM categories. Most of the development categories have very low percentages of wetlands, which are otherwise designated as Conservation. Significant agricultural use occurs in the residential, commercial and mixed use/TN categories, although the Specialized Commerce contains most of that acreage for the commercial categories. The results are fairly comparable to the DOR

analysis in that agricultural/rural uses and residential uses comprise almost 75% of the vacant acreage. Again, like the DOR finding, these figures are skewed somewhat by the annexation lands.

### **2.1.5 Land Use Allocations**

Section 163.3177(6)(a)2 provides that that the future land use plan and plan amendments shall be based on data regarding:

- The amount of land required to accommodate anticipated growth.
- The projected permanent and seasonal population of the area.
- The character of undeveloped land.
- The availability of water supplies, public facilities, and services.
- The need for redevelopment, including the renewal of blighted areas and the elimination of nonconforming uses which are inconsistent with the character of the community.

As previously noted, the Master Data Set provides the documentation required to evaluate these conditions in conjunction with the population projections to determine whether comprehensive plan amendments are necessary to accommodate anticipated growth and population demand, services available for that growth and the suitability of land if additional urban land use allocations are recommended. In addition, the Community Planning Act specifies that land use allocations shall consider the need to:

- support job creation, capital investment, and economic development that will strengthen and diversify the community's economy;
- modify land uses and development patterns within antiquated subdivision;
- achieve a balance of uses that foster vibrant, viable communities and economic development opportunities; and
- allow the operation of real estate markets to provide adequate choices for permanent and seasonal residents and business.

The Future Land Use Element must accommodate the medium population projections from EDR for at least a 10-year period, but this broader recognition of community needs allows for land use allocations that are not simply limited by population projections. This flexibility is important for Dunnellon, considering the population loss sustained during the past decade.

The residential land use need methodology included the following steps:

- Population projections are provided for the 2015-2035 planning period as previously reviewed.
- The projected population is converted to housing demand by dividing the population by persons per household to obtain housing units.

- Projected housing units are divided by (100% - seasonal vacancy rate) to account for seasonal demand. This figure is then divided by 90% to account for a 10% vacancy rate that can reasonably be expected to occur on a sustained basis. This assumes that occupancy will increase as compared to the current estimate reported by the ACS.
- The projected housing demand is then compared to the capacity of future residential development as determined based on the Future Land Use categories that are planned for urban residential development – Residential Low, Residential Medium and Residential High; Mixed Use and Traditional Neighborhood.
- In calculating FLUM development capacity, market conditions have been taken into account by calculating the average build out rate within the listed FLUM categories. This is important in considering how much development will actually occur on the vacant lands. In addition, redevelopment capacity has been calculated, which accounts for underutilized parcels, defined as parcels developing at less than 20% of the maximum development capacity.

Commercial demand was calculated based on the assumption that developed commercial square footage should increase in proportion to future population growth. This methodology calculates the developed commercial square footage per person and then multiplies that ratio by the additional population projected through 2035 to estimate the additional commercial development required by 2035. This acreage is then compared to the total commercial acreage included on the FLUM to determine if additional commercial acreage is needed to serve the additional population demand.

The following tables provide the results from the methodology as summarized above.

**Table 11. Projected Housing Demand**

	2020	2025	2030	2035
Dunnellon Moderate-High Projection	1,936	2,098	2,255	2,409
Persons Per Household	2.00	2.00	2.00	2.00
Occupied Permanent Units	968	1,049	1,128	1,204
Sustained Occupancy	10%	10%	10%	10%
Total Permanent Units	1,065	1,154	1,241	1,325
Seasonal Units	88	96	103	110
Total Housing Units	1153	1249	1343	1434

**Table 12. Vacant Residential Development Capacity**

<b>Future Land Use</b>	<b>Acres</b>	<b>Density (DU/Ac)</b>	<b>% Residential</b>	<b>Maximum Units</b>	<b>Trend Build Out %</b>	<b>Trend Units</b>
Residential Low	998.1	2.5	100%	2,486	75%	1,865
Residential Medium	111.3	5	100%	490	70%	343
Residential High	3.1	12	100%	34	55%	19
TND 8	13.2	8	100%	93	40%	37
TND 12	3.51	12	100%	39	20%	8
TND > 5 acres	78.76	12	90%	851	20%	170
Mixed Use	313.35		80%	3,008	20%	602
<b>Total</b>	<b>1,521.32</b>			<b>7,001</b>		<b>3,043</b>

1. Maximum Unit has been calculated at the parcel level and then summed. Decimals at the parcel level are reduced to the next lowest whole number. For this reason, maximum units cannot be calculated by multiplying acres x density as shown in the table.
2. TND parcels identified as “commercial vacant” by the DOR code are not included.

The FLUM provides substantially greater residential supply than required for the projected housing demand, based on just vacant acreage. However, it would be prudent to undertake additional analysis to determine whether additional locations should be identified for multi-family housing and to ensure that available sites are not limited to only a few locations under common ownership. Diverse housing options will help the City achieve more consistent and sustained growth as addressed by proposed Future Land Use Element Policy 6.2.

**Table 13. Vacant Commercial Development Capacity**

<b>Future Land Use</b>	<b>Acres</b>	<b>Maximum FAR</b>	<b>% Commercial</b>	<b>Maximum Square Feet</b>	<b>Trend Build Out %</b>	<b>Trend Square Feet</b>
Commercial	42.10	.4	100%	733,509	44%	322,744
TND 8	3.51	.3	100%	30,560	52%	16,031
TND 12	2.41	.3	100%	31,490	64%	20,154
TND > 5 acres	78.76	.3	10%	102,926	64%	65,872
Mixed Use	313.35	.3	10%	409,491	64%	262,074
<b>Total</b>	<b>440.11</b>			<b>1,307,976</b>		<b>686,875</b>

**Table 14.**

<b>2015 Population</b>	<b>2015 Commercial Square Feet</b>	<b>Commercial S.F./Person</b>	<b>2035 Population</b>	<b>2035 Commercial Square Feet Demand Based on Population</b>	<b>2035 Commercial Square Feet Capacity (existing plus projected trend vacant)</b>
1,771	861,138	486 S.F	2,409	1,170,774	1,548,013

The FLUM allocates sufficient commercial capacity to meet the needs of the projected 2035 population.

### **2.1.6 Discouraging Urban Sprawl**

The Community Planning Act revised Section 163.3177(9) to provide a “safe harbor” test for urban sprawl. Due to the complexity in applying the 13 indicators of urban sprawl listed in this section, the statute was amended to add eight additional criteria and to specify that if four of the eight are achieved, then a plan amendment will be deemed to discourage urban sprawl. The Dunnellon Comprehensive Plan was already found in compliance, including with regard to discouraging urban sprawl. The proposed amendment does not include any proposed land use changes, and does not otherwise include any proposed policy changes that would weaken the existing policy framework regarding urban sprawl. However, a new Future Land Use Policy 5.1 has been added, which specifies the types of plan amendments that would require an analysis by the applicant. This policy is designed to support urban infill and to recognize that such development discourages urban sprawl. Proposed amendments that are not defined as urban infill, are not contiguous to existing urban development or urban land use categories or that require extension of services trigger the requirement for the urban sprawl analysis. In addition, policies have been added to the Public Facility Element and the Capital Improvements Schedule to require consideration of this policy in prioritizing capital improvements.

### **2.1.7 School Planning and Concurrency**

The Dunnellon Comprehensive Plan includes required siting and coordination policies for schools. The proposed amendment clarifies the siting policies to provide greater emphasis on siting schools near neighborhoods, but otherwise does not propose changes as related to school planning.

The Dunnellon Comprehensive Plan pre-dates the former requirement for mandatory school concurrency. The Community Planning Act repealed mandatory concurrency. Section 163.3180, Florida Statutes, now provides that local governments have the option to adopt concurrency for public facilities other than potable water, sanitary sewer, drainage and solid waste.

Dunnellon Middle School is the only public school located within the City; however, Dunnellon Elementary School and Dunnellon High School are located just to the north of the City on US 41. The Marion County Five Year work program (**Appendix A.8**) indicates that sufficient capacity is available at the three schools for the five year planning period based on state

enrollment projections (COFTE). Table 15 summarizes the enrollment and capacity projections. Additional coordination should occur with the Marion County School District in regard to long term student demands. However, it is likely that such demands will occur primarily from development outside of the City. In addition, the City's objective is to encourage economic growth within the City and discourage urban sprawl. School concurrency would act as a disincentive for growth within the City, particularly if other jurisdictions have not adopted school concurrency. At this time, school concurrency is not recommended for the City of Dunnellon.

**Table 15. School Enrollment and Capacity Projections**

Location	2015 - 2016 Satis. Stu. Sta.	Actual 2015 -2016 FISH Capacity	Actual 2014 - 2015 COFTE	# Class Rooms	Actual Average 2015 - 2016 Class Size	Actual 2015 -2016 Utilization	New Stu. Capacity	New Rooms to be Added/Removed	Projected 2019 -2020 COFTE	Projected 2019 -2020 Utilization	Projected 2019 -2020 Class Size
<b>DUNNELLON SENIOR HIGH</b>	1,271	1,143	995	52	19	87%	-24	0	951	85%	18
<b>DUNNELLON ELEMENTARY</b>	648	648	674	36	19	104%	0	0	554	85%	15
<b>DUNNELLON MIDDLE</b>	1143	1028	646	52	12	63%	-59	-3	657	68%	13

Source: Marion County School District Five Year Work Plan

### **2.1.8 Airport Compatibility**

The purpose of this analysis is to evaluate the compatibility of land uses within the City of Dunnellon in the vicinity of the Marion County Airport (X35), which is located immediately west of the City of Dunnellon as shown on the Future Land Use Map, and is owned and operated by Marion County. Prior to annexations occurring over the past few years, the City of Dunnellon's nearest corporate limits were roughly two miles to the west of the airport. The annexations resulted in the incorporation of lands between the former City boundary and the airport, such that the City boundary is now contiguous to the west side of the airport. Federal and state regulations require that the City regulate land uses within its jurisdictional boundaries to ensure compatible land uses in the vicinity of the airport. This analysis summarizes those requirements and recommends an appropriate policy framework to be adopted in the Dunnellon Comprehensive Plan to implement those requirements.

#### **Statutory Requirements**

Several statutory provisions address compatibility requirements. §163.3177(6)(a)2.g., F.S., provides that the future land use plan and plan amendments shall be based upon surveys, studies and data regarding the area, as applicable, including

“the compatibility of uses on lands adjacent to an airport as defined in s. 330.35, F.S. and s. 333.02, F.S.

§333.02(1) finds that airport hazards, including obstructions, endanger lives and properties, limit maneuverability and may impair the utility of the airport. It also finds that certain activities and uses as enumerated in s. 333.03(2), F.S., are not compatible with normal airport operations. These enumerated land uses include landfills, residential and educational uses within certain distances. Residential and educational uses are the primary uses that warrant evaluation for the City of Dunnellon, and compatibility is determined in terms of preventing obstructions within defined air spaces/surfaces and in terms of limiting noise impacts.

§333.03(2)(c) and (d) addresses noise impacts. These provisions prohibit residential and educational uses, as defined in Chapter 1013, F.S., within any noise contour defined as incompatible through a noise study conducted pursuant to 14 C.F.R., part 150. If a study has not been completed then residential and education uses are not permitted “within an area contiguous to the airport measuring one-half the length of the longest runway on either side of and at the end of each runway centerline.”

§333.03(3) specifies land use restrictions within the airport clear zones. Educational facilities are prohibited within “an area which extends 5 miles in a direct line along the centerline of the runway, and which has a width measuring one-half the length of the runway.” In addition, this

subsection requires airport zoning regulations which “restrict new incompatible land uses... within runway clear zones, including uses, activities, or construction which are incompatible with normal airport operations or endanger public health, safety, and welfare by resulting in congregations of people, emissions of light or smoke, or attraction of birds.”

§333.03(1)(a), F.S., requires that “every political subdivision having an airport hazard area within its territorial limits shall,, adopt, administer, and enforce... airport zoning regulations for such airport hazard area,” and § 333.03(1)(b), F.S., addresses the specific situation in Dunnellon where one jurisdiction owns and operates the airport (i.e., Marion County), and the airport hazard areas occur in the adjacent jurisdiction (i.e., Dunnellon); in that situation, the two local governments must either execute an interlocal agreement or form a joint airport zoning board to comply with the requirements of s. 333.03(1)(a), F.S.

### **Marion County Airport Master Plan**

As owner and operator of the airport, Marion County commissioned the *Marion County Airport Master Plan*, which was completed in January 2010. The Master Plan provides detailed information regarding the planning, design and operations of the airport and is the primary data source for the information summarized in this analysis. Section 5.3 reviews the “Airspace Surfaces” required by Federal Aviation Regulations, (FAR) Part 77, “Objects Affecting Navigable Airspace.” The Master Plan states:

This Federal criterion has been established for use by local planning and land use jurisdictions to control the height of objects in the vicinity of the airport. The Specific imaginary surfaces, which shall be protected from obstructions, include:

#### ***Primary Surface***

A rectangular area symmetrically located about each runway centerline and extending a distance of 200 feet beyond each threshold, when the runway is paved. Width of the Primary Surface is based on the most sophisticated approach procedure a runway has, while the elevation follows, and is the same as that of the runway centerline, along all points. For Runway 05-23 this width is 1,000 feet and for Runway 09-27 the width is 500 feet.

#### ***Horizontal Surface***

An oval-shaped area situated 150 feet above the established airport elevation, extending 5,000 or 10,000 feet outward, depending on the runway category and approach procedure available. Both Runway 05-23 and Runway 09-27 will require a 10,000 foot Horizontal Surface radius at an elevation of 216 feet above mean sea level (AMSL).

### ***Conical Surface***

Extends outward for a distance of 4,000 feet beginning at the outer edge of the Horizontal Surface, and sloping upward at a ratio of 20:1. For the Marion County Airport the Conical Surface protects airspace up to 416 feet AMSL.

### ***Approach Surfaces***

These surfaces begin at the end of the Primary Surface and slope upward at a ratio determined by the runway category and type of instrument approach available to the individual runway ends. The width and elevation of the inner end conforms to that of the Primary Surface while Approach Surface width and length to the outer end are also governed by the runway category and instrument approach procedure available. For the ultimate precision instrument approach planned to Runway 23 a surface that extends out 10,000 feet at a slope of 50:1 and then out another 40,000 feet at a slope of 40:1 with an outer width of 16,000 feet. For Runway 05 and both ends of Runway 09-27, the ultimate non-precision instrument approaches require a surface that extends out 10,000 feet at a slope of 34:1 to an outer width of 3,500 feet.

### ***Transitional Surface***

A sloping area beginning at the edges of the Primary and Approach Surfaces that extend upward and outward at a 7:1 ratio.

The Master Plan also states:

Current height restrictions and compatible land use zoning for the area surrounding the airport are included in the 2008 Marion County Comprehensive Plan...the transportation element outlines the County's policies and regulations related to tall structures, airport overlay zoning ordinance, and adjacent land uses.

Marion County has also adopted an Airport Zoning Overlay set forth in the County Code, which regulates the type, location and height of structures, trees and other potential obstructions within the defined airport hazard zones. However, the Airport Zoning Overlay is not applicable within incorporated areas, which is the reason that the statute calls for coordination between Marion County and Dunnellon so that Dunnellon can appropriately plan for land uses and regulate obstructions within the airport hazard areas occurring within the City.

The Airport Master Plan contemplates various scenarios for future airport development and alternative runways. Based on existing conditions and all alternative future runways, the Primary Zone lies entirely within the airport boundaries, while the Approach, Horizontal and Conical zones extend over the City. Of these three hazard zones, the Approach zone occurs at the lowest altitude. The Airport Layout Plan Drawing Set, which is incorporated into the Airport Master Plan, indicates that the Approach Zone over lands within Dunnellon occurs at an altitude much higher than the City's current, maximum building height limit of 40' and higher than any trees could potentially reach. However, this finding should be verified by Marion County, and

an exhibit should be prepared, which documents the altitude of the Approach, Horizontal and Conical Zones over Dunnellon air space or at least the lowest altitude of the Approach Zone over Dunnellon air space.

The City must also coordinate with Marion County on any special uses, such as cellular towers, that could potentially penetrate the hazard zones. While the 40' building height does not require revisions an interlocal agreement should be executed with Marion County. Future cellular towers within the City could potentially occur as obstructions within one of more of these hazard zones unless "surface planes" are defined over Dunnellon airspace.

Drawing #2 of the Airport Layout Drawings confirms that Runway 05-23 is the longest existing runway measuring 4,921' and is planned for a future extension to 6,200' to accommodate additional, small jet aircraft. The Airport Master Plan does not indicate that a noise study has been completed. Therefore, pursuant to s. 333.03(2)(d), F.S., residential and educational uses are not permitted within 2,461' from the end and both sides of each runway, and would not be permitted within 3,100' from the end and both sides of future runways. **Appendix A-9** is the Future Land Use Map with the existing noise compatibility identified, which extends into properties currently designated as Residential Low Density and Rural on the Future Land Use Map. This exhibit also identifies the additional lands that would be encompassed within the noise zone if the runways are extended as discussed above. The Dunnellon Future Land Use Map was amended in 2010 and 2012 as a result of annexations. Pursuant to Ordinance 2010-11, the Residential Low Density land use category was assigned when those properties were annexed by the City. Similarly, pursuant to Ordinance 2012-07, the County's Rural land use category was assigned when that property was annexed into the City.

The Rural land use category should be changed to a City FLUM category as soon as possible in another round of amendments following the adoption of the EAR-based amendments. Those portions of the property occurring within the noise compatibility zones should be designated as Agricultural. If the City would like to consider a more intensive land use category, it should work with Marion County to determine whether a airport noise study could be completed, which may potentially reduce the size of the noise zone otherwise required by statute. The Specialized Commerce land use category is near the airport, but is not subject to restrictions, except as may be necessary to limit uses that would allow a congregation of people within the clear zone. The Specialized Commerce category is County designation and should be changed to a City land use category as soon as possible following adoption of the EAR-based amendments.

**Appendix A-9** also defines the clear zones based on the existing runways at the airport. Pursuant to s. 330.03(3), F.S., new public education facilities are defined as an incompatible use within the clear zone, as well as uses that result in congregations of people, emissions of light and smoke, or attraction of birds. As shown, the clear zone does not currently encompass any

schools; however, any extension of Runway 09-27 would potentially extend the clear zone to encompass the Dunnellon Middle School.

### **Proposed Comprehensive Plan Amendments**

The Comprehensive Plan does not currently address airport compatibility directly, but does include two coordination policies:

Traffic Circulation Policy 3.4: Monitor plans for the Dunnellon Airport to ensure that impacts on the City's transportation system resulting from airport improvements are properly planned for.

Intergovernmental Coordination Policy 1.7: The City Council designee shall coordinate with Marion County, FDOT and the Transportation Planning Organization to ensure that impacts of future expansion of the Dunnellon Airport are coordinated with the City's Future Land Use and Traffic Circulation Element.

The Future Land Use Element should be amended to include airport compatibility policies based on the statutory requirements specified above. The following objective and associated policies are proposed:

Objective 8. The City of Dunnellon shall prohibit land uses and development that are defined as incompatible with normal airport operations at the Dunnellon Airport.

Policy 8.1. The City of Dunnellon shall coordinate with Marion County to execute an interlocal agreement or formulate a Joint Airport Zoning Board by January 1, 2017 to ensure that decision-making by both jurisdictions are adequately coordinated regarding Marion County airport planning and Dunnellon land use and transportation planning.

Policy 8.2. The City of Dunnellon shall prohibit public education facilities and residential uses and development within noise compatibility zones, as defined by 333.03(2)(c) and (d), Florida Statutes, as applicable. The City shall confirm the extent of existing noise compatibility zones with Marion County, and the potential extent of future noise compatibility zones based on any runway modifications that may be considered by Marion County.

Policy 8.3. The City of Dunnellon shall prohibit the following uses within clear zones, as defined by 333.03(3), Florida Statutes:

- A. Public and private education schools.
- B. Uses encouraging or requiring a concentration of people, such as auditoriums, arenas, large-scale multifamily development and large-scale office uses.

- C. Industrial uses which emit smoke and uses which emit light that could potentially pose a hazard to aircraft operations.

Policy 8.4. The City of Dunnellon shall not allow obstructions, such as buildings, structures, poles and trees to penetrate airport hazard zone surfaces occurring within its jurisdiction. The City limits building height to 40' within all future land use categories. Prior to considering any future amendment to the 40' building height standard, the City shall document that any proposed building height standard would not penetrate applicable airport hazard zones and surfaces, as defined by the Federal Aviation Administration.

Policy 8.5. The City of Dunnellon shall adopt an airport zoning overlay by January 1, 2017 to implement land development regulations based on Objective 8 and its implementing policies.

## **2.2 Transportation Element**

The future land use element must be coordinated with planning for future roadway needs. Dunnellon is served by the following arterial and collector roads:

- US 41 - primary north-south route;
- CR 484 – primary east route; and
- CR 40 – primary west route.

The Existing Transportation Map identifies these roads and their functional classification as determined by FDOT. In addition, Dunnellon was originally planned on a traditional, grid system of local roads, which continues to serve the City, providing interconnectivity between neighborhoods and minimizing the need for the use of arterials and collectors for local trips.

### **2.2.1. Roadway Characteristics**

The GIS data set includes FDOT's "roadway characteristics" for the major roadways in the City.

### **2.2.2. Traffic Counts**

The City of Dunnellon relies on traffic count data provided by FDOT and the Marion County Transportation Planning Organization (TPO). Tables 15 and 16 provide a summary of the traffic counts available for 2009-2014.

### **2.2.3 TPO Plans**

The TPO is currently in the process of updating the Marion County Long Range Transportation Plan (LRTP) for Year 2040. The 2035 LRTP is currently in effect, but will be superseded by the 2040 TRTP upon adoption this year. The purpose of the LRTP is to forecast future transportation "needs" based primarily on forecasted population and employment growth, and to adopt a "cost feasible" plan for prioritized needs that can be funded. The "Needs Plan" identifies the improvements required in order to achieve and maintain an acceptable level of service on all major roads through the LRTP horizon. Due to funding constraints, the Needs Plan typically

identifies “unfunded needs,” which means that adequate funding is not available to achieve acceptable LOS conditions for certain roadway segments during the LRTP planning period. The Cost Feasible Plan identifies roadway improvements that the TPO anticipates will be implemented based on projected revenue.

The TPO adopts the 5-Year Transportation Improvement Program (TIP) each year. The TIP programs funding for transportation studies, roadway design, right of way acquisition, construction and other transportation improvements, such as Intelligent Transportation System components. The TIP essentially implements the Cost Feasible Plan in five year increments and is similar to local government Capital Improvement Schedules and FDOT’s Five Year Work Plan.

The 2035 LRTP and the pending 2040 LRTP identify only one improvement within the City of Dunnellon - US 41 will be widened to four lanes from S.W. 111<sup>th</sup> Place to SR 40. This improvement is scheduled for construction in the TIP for 2020. This is a significant capacity improvement that is projected to maintain LOS C on this segment of US 41 through 2040. The 2035 LRTP identifies the future widening of CR 484 to four lanes as an unfunded need (i.e., it was not included in the Cost Feasible Plan) and forecasts this segment will degrade below LOS C by 2035. The 2035 LRTP does not provide interim forecasts to identify when CR 484 would be projected to degrade below LOS C during the planning period. By comparison, the 2040 LRTP does not identify CR 484 as a long term need and forecasts that the roadway will not be congested in 2040. The reason for this difference is that the 2035 LRTP relied on 2005 as the base year, and projected much higher population and employment growth based on the pre-recession economic boon still in progress at that time. The 2040 LRTP has been prepared using 2010 as the base year, resulting in significantly lower population and employment forecasts with corresponding reductions in forecasted traffic volumes.

#### 2.2.4 Existing and Projected Levels of Service

Table 16 presents the existing and projected traffic volumes for roadways within Dunnellon as determined by the 2035 LRTP and the 2040 LRTP.

**Table 16. 2040 LRTP Summary**

Road	Segment	Capacity	2013 PSWADT	2013 Volume/ Capacity	2040 E+C Projected Volume	2040 E+C Projected V/C	2040 V/C @ 1% Annual Growth	2040 V/C @ 1.5% Annual Growth
US 41	Citrus County Line to S.W. 111 <sup>th</sup> Place	32,400	21,546	.67	39,750	1.23	.87	.99
C.R. 484	US 41 to SR 200	24,200	8,041	.33	11,685	.48	.43	.50

Neither the 2035 LRTP nor the 2040 LRTP provide existing and projected level of service conditions for all collectors and arterial roadways in the City of Dunnellon. Moreover, as previously noted, the TPO does not record traffic counts on all collector and arterial segments within the City. This is a significant data deficiency for the City in terms of effectively planning for long term transportation needs and implementation of transportation concurrency.

Table 17 provides a 5-year summary of traffic volumes based on linear regression (i.e., trend growth) and confirms negative trends for all but two of the roadways.

**Table 17. Five Year Growth Rate 2010-2014**

Road	Location	2010	2014	5-year Annual Growth Rate
US 41	1.027 Miles North of CR 484	18,800	18,100	-.93%
US 41	.55 Miles North of CR 484	24,000	23,000	-.96%
Us 41	.01 Miles North of Citrus County line.	18,000	18,700	1.19%
CR 40	West of US 41	4,400	3,200	-6.47%
C.R. 484	US 41 to SR 200	11,300	8,300	-6.00%
Powell Road	US 41 to Cedar Street	3,300	3,600	2.89%
SW 180 <sup>th</sup> Avenue	CR 484 to SW 102 Street Road	3,200	2,400	-6.80%

### 2.2.5 Transportation Concurrency

Section 163.3180, Florida Statutes, defines transportation concurrency as optional. However, if a local government implements transportation concurrency, certain minimum requirements must be met. Most fundamentally, transportation concurrency requires the long term ability to achieve and maintain the adopted LOS standards. The Dunnellon Comprehensive Plan defines US 41 within the City limits as a constrained facility, and allows only a 5% degradation below the adopted LOS C standard. This approach is outdated and generally not utilized by local governments. Rather, in the situation where a LOS standard cannot be achieved and maintained, many local governments opt to either establish a transportation concurrency exception district or opt to repeal transportation concurrency.

The City of Dunnellon must make a policy decision as to whether to continue or repeal transportation concurrency. From an economic development perspective, it would be preferable to repeal transportation concurrency, as the City does not have the ability to maintain the adopted LOS C standard on US 41, and other roadways have significant capacity available. If the City chooses to continue transportation concurrency, then it should consider either reducing the LOS standard to at least LOS D or possibly to LOS E+50%. From a mobility perspective, the City is in an ideal position to continue supporting alternatives, including car-pooling, bicycling and walking. The ACS survey data indicate that the City benefits from fairly high use of these alternatives with single use automobile trips accounting for only 80% of all trips.

From a fiscal perspective, there are other options for generating funding for transportation improvements. Impact fees are commonly utilized as an alternative and have the advantage of generating fees from all residential units and commercial development. However, impact fees require a study to set the fee schedule and involve other expenses to implement. Transportation concurrency is not as equitable in that it typically charges only the developer or development that exhausts the remaining capacity. Other developers utilizing available capacity are not required to pay proportionate share fees. The City's transportation policies currently require proportionate share payments, but do not provide a long term strategy for encouraging economic development. Given that many of the trips on US 41 occur as trips passing through the City and are unrelated to new development impacts within the City, continued reliance on concurrency with no physical ability to increase capacity on US 41 will act as a disincentive for growth within City, and will place the City at a competitive disadvantage to its neighbors.

The proposed amendments revise the adopted LOS standard from LOS C to LOS D. However, it is recommended that the City instead repeal transportation concurrency. In addition to the policy issues as discussed above, the City does not have staffing and funding to maintain adequate traffic counts, to properly review transportation studies and to implement other requirements of transportation concurrency.

## **2.3 Public Facilities Element**

Section 163.3177(6)I requires that the Dunnellon Comprehensive Plan include a "general sanitary sewer, solid waste, drainage, potable water, and natural groundwater aquifer recharge element." The City had previously adopted an Infrastructure Element and Public Facilities Element as presented in the Consolidated Comprehensive Plan previously submitted to the City. These two elements essentially serve the same planning function in complying with this statutory requirement and included redundant provisions. The proposed amendments delete the Infrastructure Element and relocate some of those objectives and policies to the Public Facilities Element where not otherwise redundant. The City had also drafted an Aquifer Protection Element, but had not adopted the element. The proposed amendments include the Aquifer Protection Element for adoption.

### **2.3.1 Potable Water and Wastewater**

The City retained Kimley Horn to prepare the 2012 Potable Water and Wastewater Master Plan (2012 Master Plan). This document is included as **Appendix A-10** (on CD only). The existing water and wastewater system maps presented in this Volume I Supplement utilize GIS layers provided by Kimley Horn. The 2012 Master Plan identifies numerous system improvements to correct existing deficiencies, improve system redundancy, service additional existing developed neighborhoods, service undeveloped areas in the City and to potentially serve the annexed areas near the airport. Table 18 provides a list of improvements implemented by the City during the past five years based on the Master Plan and previous planning efforts.

Table 18.

**ENGINEER'S OPINION OF PROBABLE COST  
CITY OF DUNNELLON - UTILITY CAPITAL IMPROVEMENTS**

ITEM	PROJECT	DESCRIPTION OF WORK	AMOUNT	2013	2014	2015	Beyond
<b>Water System Improvements</b>							
1	New Generator for Rainbow Springs WTP	Replace Rainbow Springs WTP Backup Generator (Use Juliette Falls and Replace)	\$60,000	\$60,000	Complete		-
2	Water Meter Replacement	Replace Existing Meters with Radio Read Meters	\$754,000	\$73,382	\$21,502	\$18,906	\$640,210
3	Rainbow Springs Fire Hydrant Program	Construct 96 Fire Hydrants (some with WM extensions) in Rainbow Springs	\$1,731,000	-	-	-	\$1,731,000
4	Watermain Replacement Program	Comprehensive Line Replacement Program for AC, Pit Cast, and Ductile Pipes	\$150,000 / year	\$20,000 (est)	\$20,000 (est)	\$20,000 (est)	\$150,000
5	Rainbow Springs Service Line Replacement	As Needed Replacement of Poly-Butylene Service Lines in Rainbow Springs	\$92,400	\$10,000 (est)	\$10,000 (est)	\$10,000 (est)	\$62,400
6	Rainbow Springs/City of Dunnellon Interconnect	Construct 12" Watermain to Connect RBS and City Systems (w/ Chatmire Extension)	\$650,000 (rev)	\$0	\$0	\$60,000 (est)	\$590,000
7	City of Dunnellon CRA Fire Hydrant Program	Construct 21 Fire Hydrants (some with WM extensions) in City Limits	\$546,000	\$0	\$0	\$0	\$546,000
8	CR 484 12" Watermain Extension	Construct 12" Watermain to connect Dunnellon Airpor	\$1,480,000	\$0	-	-	-
9	New Water Treatment Plant - Phase 1	Design and Construct New WTP East of City	\$1,050,000	\$0	\$0	-	-
10	E. McKinney Interconnect	Construct 12" Watermain Underneath CSX Railroad	\$139,000	\$0	\$0	\$139,000	Complete
11	Pennsylvania Ave. Watermain Replacement	Construct 8" Watermain to Replace Existing 8" Watermain	\$322,000	-	-	-	\$322,000
12	Powell Road 6" Watermain Extension	Construct 6" Watermain East of Illinois Street	\$39,000	-	-	\$0	\$39,000
13	West McKinney Watermain Extension	Extend Existing 6" Watermain to West and South to Connect unknown Road	\$73,000	-	\$0	\$0	\$73,000
14	South Ohio Street 6" WM Extension	Extend Existing 6" Watermain from Datesman Ave. to Hwy 40	\$74,000	-	\$0	\$74,000	Complete
15	Brooks Street Watermain Extension	Construct 6" Watermain Underneath CSX Railroad	\$121,000	-	-	-	-
16	SR 41 Watermain Replacement	Construct 12" Replacement Watermain along SR 41 and Illinois Street	\$227,000	\$0	\$0	\$550,613	Complete
17	Well #1 Chlorine Contact Time	Improvements Required to Correct Chlorine Contact Time Issue at City WTP	\$50,000	\$50,000	Complete	-	-
18	Isolation Valve Program	Construct Valves to Enable Isolation of Existing Fire Hydrants (4 per year)	\$28,000.00 / year	\$0	\$0	\$5,000	\$28,000
19	Rolling Hills Road 6" to 8" WM Upgrade	Construct 8" Watermain along Rolling Hills Road North of Hwy. 40	\$155,000	-	-	-	\$155,000
20	Hytovick Watermain Relocation	Relocate 6" Watermain currently on Hytovick Property	\$114,000	\$0	\$0	-	-
21	The Granada Watermain Extension	Extend 6" Watermain on the Granada to Palmetto Way	\$97,000	-	\$97,000	-	-
22	Rio Vista / Rainbow Springs Interconnect	Construct 8" Watermain to Connect Rio Vista and Rainbow Springs	\$65,000	\$65,000	-	-	-
<b>Sanitary Sewer Improvements</b>							
1	Rainbow Springs Lift Station Improvements	Safety and Operational Improvements for Lift Stations in Rainbow Springs	\$500,300	\$15,000 (est)	\$75,000 (est)	\$10,000 (est)	-
2	Infiltration and Inflow Study	Investigation into I&I Through Testing and Video	\$67,500	-	\$0		-
3	Infiltration and Inflow Repairs	Repair damage found by Infiltration and Inflow Study	Annual TBD	Annual TBD	Annual TBD	Annual TBD	Annual TBD
4	Rio Vista WWTF Decommissioning	FM Construction, Lift Station Retrofit, Repair I&I sections, and Plant Decommission	\$1,294,269	\$80,000 (est)	\$80,000 (est)	\$1,134,269	Complete
<b>System-wide Improvements</b>							
1	S.C.A.D.A System Phase 1	SCADA system for Water Treatment Plants	\$206,000	\$0	-	-	\$206,000
2	S.C.A.D.A System Phase 2	SCADA system for Wastewater Treatment Plants	\$160,000	\$0	-	-	\$160,000
3	S.C.A.D.A System Phase 3	SCADA system for Lift Stations	\$370,000	-	\$0	\$0	\$370,000
<b>Grand Total</b>			<b>\$10,615,469.00</b>	<b>\$373,382</b>	<b>\$303,502</b>	<b>\$2,021,788</b>	<b>\$5,072,610</b>
<p><i>The Engineer has no control over the cost of labor, materials, equipment, or over the Contractor's methods of determining prices or over competitive bidding or market conditions. Opinions of probable costs provided herein are based on the information known to Engineer at this time and represent only the Engineer's judgment as a design professional familiar with the construction industry. The Engineer cannot and does not guarantee that proposals, bids, or actual construction costs will not vary from its opinions of probable costs.</i></p>							

Based on the findings of the 2012 Master Plan, the proposed amendments do not incorporate any recommended changes to the adopted LOS standards. However, Public Facilities Element Policy 5.1.2 included an outdated reference to a wastewater LOS standard that conflicts with the adopted LOS policies in the Capital Improvements Element. The proposed amendments delete this outdated policy. The most significant policy issue facing the City is whether and when to extend potable water and wastewater to the annexed area. The Comprehensive Plan includes conflicting policy language in this regard. While Public Facilities Policy 2.1.2 recognizes that septic tanks may be permitted in accordance with Department of Health regulations, Public Facilities Policy 1.1.5 states that all development within the City must be served by central facilities. The proposed amendments clarify Policy 1.1.5 to indicate that all development must connect to central facilities when available.

The Comprehensive Plan includes several policies, which prioritize capital improvements and require correction of deficiencies and serving developed areas prior to expansion of the system for development. The proposed amendments further refine this approach as previously discussed in Section 2.1.6 regarding urban sprawl to differentiate infill development versus expansion to non-infill properties.

The City relies on contracted solid waste services to comply with the adopted LOS standard – 5.316/person per day. No proposed amendments are identified in regard to Solid Waste. The drainage LOS standard is set forth in Public Facilities Policy 4.1.1. No proposed amendments are identified in regard to the drainage LOS standard.

## **2.4 Aquifer Protection Element**

The proposed Aquifer Protection Element includes policies to protect the quantity and quality of groundwater resources in conjunction with the Public Facilities Element and the development standards set forth in the Future Land Use Element. The City had previously drafted this element, but did not adopt the element. The proposed amendments transfer various policies from the Public Facilities Element, which are focused on aquifer protection. Based on the City's impervious coverage limitation of 65%, the proposed amendments also revise open space requirements from 30% to 35% to be consistent with this standard. Otherwise, no additional amendments are proposed. However, **Appendix A-11** provides a map defining the recharge rates within the City based on modeling conducted by the Florida Geologic Survey. While the City has relatively high recharge rates, the SJRWMD has not yet designated any prime recharge areas.

## **2.5 Housing**

Section 2.1.4 evaluated the need for additional land use allocations to meet projected housing needs and confirmed that the future land use map allocates sufficient acreage in the Residential land use categories, and Traditional Neighborhood land use categories to accommodate projected housing demands. These categories allow single family units at 2.5 DUA (low density) and 5 DUA (medium density), single family and multi-family at 8 DUA (Traditional Neighborhood) and up to 12 DUA (Traditional Neighborhood). Mobile homes are also an allowable use within these land use categories.

The 2014 ACS provides documentation regarding the City’s housing stock and is the most comprehensive data set available. The ACS will continue to annually conduct surveys in the City of Dunnellon and will produce additional data sets that will supplement certain data sets from the decennial census. In addition, the ACS publishes 5-year estimates for Dunnellon. The annual surveys sample a smaller population, and are subject to greater sampling error, while the 5-year surveys sample a larger population set on fewer questions, but achieve less sampling error than the annual data sets.

The proposed amendments do not include any future land use map amendments, and the Community Planning Act does not establish any new policy requirements regarding the housing element. The primary purpose of the housing element is to define housing needs. In addition to the review of land use categories to determine the types of residential units allowed by the Future Land Use categories, the housing element typically addresses housing affordability and substandard housing problems.

Section 163.3164(3) defines “affordable” as:

“Affordable” means monthly rents or monthly mortgage payments including taxes, insurance, and utilities do not exceed 30 percent of that amount which represents the percentage of the median adjusted gross annual income [MAGAI] for the households...

This definition cross-references to statutory definitions for households qualifying based on MAGAI not exceeding the following percentages of the median income of households within the County: extremely low income (30%), low income (80%) and moderate income (120%). Marion County’s median household income is estimated by the ACS as 39,339, which establishes the following income thresholds. The ACS does not provide MAGAI, but does provide an estimate of households, by income brackets, expending more than 30% of household income on housing costs. The income brackets do not correspond exactly to the thresholds above. However, the income brackets provide a general indication of relative affordability in Dunnellon. Based on these data sets, it can be inferred that the extremely low income group experiences the most significant affordability challenge, as would be expected.

**Table 19.**

<b>Marion County Median Household Income</b>	<b>Extremely Low Income Household MAGAI Threshold (30%)</b>	<b>Low Income Household MAGAI Threshold (80%)</b>	<b>Moderate Income Household MAGAI Threshold</b>
\$39,339	\$11,802	\$31,472	\$47,207
Income Brackets	% of Households in Income Bracket Spending > 30% on Housing Costs	% of Households in Income Bracket Spending > 30% on Housing Costs	% of Households in Income Bracket Spending > 30% on Housing Costs
< \$20,000	31.1%	N/A	
\$20,000-\$34,999		3.9%	
\$35,000-\$49,999			2.7%

Source: ACS 2009-2013 Survey and ACS 2014, Table S503

Additional data will be required in order for the City to conduct an affordable housing needs assessment based on MAGAI and the specific thresholds for the three household groups. While this analysis is not required for the proposed amendments, the City could consider obtaining technical assistance from the State to develop the data sets in the future to more accurately determine affordable housing needs. **Appendix A.12** identifies multifamily and mobile home sites that currently provide options for lower income households.

The ACS does not provide data to determine substandard housing conditions. However, ACS table S2504 estimates from sample survey that 100% of the housing stock has complete plumbing and complete kitchens and that 97% are served by electric utilities. While this analysis is not required for the proposed amendments, the City could consider obtaining technical assistance from the State to develop the data sets in the future. This is typically performed manually by a windshield survey and/or through the use of some type of survey (i.e., mail, phone calls, etc.).

## **2.6 Historic Preservation Element**

The City had previously drafted, but not adopted the Historic Preservation Element. The proposed amendments include the Historic Preservation Element for adoption. The primary supporting data set for this element is the National Register of Historic Places application and existing Volume 1. The City designated a Historic District with the National Register in 1987, which identifies “contributing” historic structures and “non-contributing” historic structures. The City has also adopted an Historic Preservation Ordinance and prepared an Historic Preservation design guideline to assist landowners and contractors in understanding the requirements of the program and potential design options.

The adopted Future Land Use map series identifies the Dunnellon Historic District and the contributing and non-contributing structures.

## **2.7 Conservation Element**

The Conservation Element works in conjunction with the Future Land Use Element, Public Facilities Element and Aquifer Protection Element to establish objectives and policies to protect the natural resources within the City. The proposed amendment includes the following updated maps to be adopted as part of the Future Land Use map series that support the Conservation Element:

- Lakes, Rivers and Wetlands
- Existing Cone of Influence for Wellfields
- Floodplain Hazard Zones
- NRCS Soils Map

Other than the updated maps, the proposed amendment does not include any significant amendments to the Conservation Element. The Community Planning Act did not establish any new requirements regarding the Conservation Element, except incorporating those that were previously required by former Rule 9J-5, F.A.C.

As mentioned in the Public Facilities Element, the 10-year Water Supply Plan must be prepared within 18 months following the adoption of the Southwest Florida Regional Water Supply Plan.

## **2.8 Recreation and Open Space Element**

Section 163.3177(6)(e) provides that the recreation element shall address a “comprehensive system of public and private sites for recreation, including, but not limited to, natural reservations, parks and playgrounds, parkways, beaches and public access to beaches, open spaces, waterways, and other recreational facilities.” The Recreation and Open Space Element addresses public parks as well as opportunities for private recreation. In addition, the element calls for the protection of the Withlacoochee and Rainbow rivers, conservation lands, wetlands, wellfield protection areas, areas that will protect the quality of natural springs and open space areas owned by the State of Florida.

### **2.8.1 Recreation/Parks Concurrency**

The Community Planning Act does not require concurrency for parks, but does allow a local government to establish concurrency for “public facilities.” While s. 163.3177(6)(e) calls for a comprehensive system of sites for recreation, including private sites, s. 163.3180(1) limits the applicability of optional concurrency to only “public facilities.” The proposed amendment revises Objective 1 to apply concurrency to only public parks. The Recreation and Open Space Element adopts two acres/1000 population as the adopted LOS standard for neighborhood and community parks:

Policy 1.1: The City shall maintain a level of service standard of 2 acres per 1,000 population for its neighborhood parks.

Policy 1.2: The City shall maintain a level of service standard of 2 acres per 1,000 population for its community parks.

However, the Recreation Element does not adopt a definition for neighborhood or community parks. The proposed amendments include a new policy to define neighborhood parks as public parks with less than five acres and to define community parks as public parks with five or more acres. These standards are generally consistent with accepted thresholds for these parks, although it is not uncommon to see neighborhood parks defined based on up to 10 acres. It should also be noted that the Future Land Use element includes policies that require private developments to provide parks as a means to satisfy concurrency. The proposed amendments revise those policies to delete requirements for private park space, as a means to satisfying concurrency. However, the City can require private developments to provide minimum open space for the development.

Table 20 provides an inventory of the neighborhood and community parks in the City based on the proposed definitions:

**Table 20. Parks Inventory**

NAME	TYPE	±AC
BLUE RUN OF DUNNELTON PARK & CANOE TAKE OUT POINT	COMMUNITY PARK	31.78
DUNNELTON RECREATIONAL AREA	COMMUNITY PARK	42.21
CENTENNIAL PARK AND DUNNELTON BOAT RAMP	NATURE PARK / BOAT RAMP	0.85
DUNNELTON CITY BEACH PARK	NEIGHBORHOOD PARK / PLAYGROUND	1.04
ERNIE MILLS PARK	NEIGHBORHOOD PARK / PLAYGROUND	2.22
L O ROBINSON PARK	NEIGHBORHOOD PARK / PLAYGROUND	0.99
<b>TOTAL:</b>		<b>79.09</b>

Based on the moderate-high population forecast, the 2035 projected population (2,409 acres) requires a minimum of 4.82 acres of neighborhood parks and 4.82 acres of community parks. The City’s existing park inventory includes adequate park acreage for both types of parks to meet the LOS standards through 2035.

**2.8.2. Alternatives to Optional Park Concurrency**

Concurrency inherently charges more to the final developer or development that exhausts available capacity and causes the LOS to be deficient. As such, concurrency is not as equitable as impact fees in that only certain developments pay concurrency, while all new development pays impact fees. However, the advantage of concurrency is that it can be applied to new subdivisions that cause a LOS deficiency, while impact fees are applied to proposed dwelling units at building permit issuance. Thus, one advantage of concurrency is that funding can be collected in advance of the impacts, but this is also the very reason that concurrency acts as a disincentive for growth and incite development to locate outside of the City to avoid concurrency constraints and/or concurrency payments. As such, concurrency can encourage urban sprawl, particularly if the adjacent jurisdiction does not apply concurrency or has sufficient capacity. This is not a problem for Dunnellon in terms of its recreational LOS standards.

As previously reviewed for optional transportation, the City has four basic options in regard to planning and funding park needs:

- 1) Continue parks concurrency. Unlike transportation, the City can readily monitor its park acreage to ensure that it is properly planning for park needs and properly implementing concurrency. The proposed amendment defines neighborhood parks based on acreage only. However, neighborhood parks are also often defined in terms of accessibility to neighborhoods based on a service range. For example, neighborhood parks often have a service range of 1-2 miles, while community parks serve the greater community with a range of 3-5 miles. The City could consider a different LOS standard that accounts for accessibility, but that would result in potential deficits, as the neighborhood parks are located only certain neighborhoods.
- 2) Discontinue concurrency, but establish impact fees. This approach would require an impact fee study by a qualified consultant. The downside of impact fees is that they can serve as a

disincentive for new growth. Impact fees are subject to specific standards resulting from judicial review. For example, the “dual rational nexus” test requires that the impact fee must be rationally based on the impact of the development and that the impact fee must be utilized to provide a benefit to the unit is proportionate to the fee that is charged. Impact fees can only be charged for the impacts of new growth and cannot be charged for existing deficiencies, and are typically charged and utilized for capital improvements, and not maintenance and operational costs. Like concurrency, impact fees can be charged only for impacts and benefits related to public parks and not private parks. There are many additional legal requirements that must be met by an impact fee program. These requirements also apply to exactions. However, the City can require residential developments to provide open space.

- 3) Discontinue concurrency, but rely on user fees. This approach directly charges the person using the park or particular facilities, such as a boat ramp within a park.
- 4) Discontinue concurrency and rely on tax revenue. This approach could also be combined with impact fees and/or user fees, as well as grant funding. user fees and other potential funding sources to maintain acceptable park sites.

Optional concurrency is a policy choice for the City. Based on the acreage available in the City and the projected population, the current LOS standards are financially feasible through the five year planning period and sustainable through the 2035 plan horizon.

## **2.9 Intergovernmental Coordination Element**

The Intergovernmental Coordination Element does not require any additional supporting data and analysis based on the changes from the Community Planning Act. The proposed amendments to the Intergovernmental Coordination Element are minor in scope.

## **2.10 Capital Improvements Element**

The Capital Improvements Element serves several important purposes:

- 1) Prioritizes capital improvements that the City will undertake during the five year planning period and through the long range planning period;
- 2) Establishes fiscal policies to ensure that the City’s debt obligations and other measures are within acceptable ranges;
- 3) Recognizes the LOS standards established by the other elements and establishes funding strategies and priorities to ensure that LOS standards will be achieved and maintained;
- 4) Requires the adoption of a five-year capital improvements schedule to fund capital improvement projects required to improve or replace obsolete or deficient facilities, service existing development and support new growth based on the adopted LOS standards.

The proposed amendments include revised policies as follows:

- provide additional policies to further prioritize capital improvements to discourage urban sprawl;
- adopt the TPO Five-Year Transportation Improvement Plan by reference;

- specify that the City has the option to adopt the Capital Improvements Schedule by ordinance rather than as a plan amendment; and
- indicate that the City has the option to include transportation improvements in the 4<sup>th</sup> and 5<sup>th</sup> year of the Capital Improvements Schedule as unfunded or partially funded with the expectation that additional funding will be established as the projects move into years 1-3 of the program.

If the City chooses to repeal transportation concurrency, then the transportation related policy amendments would not be required. No additional changes are required based on the requirements of the Community Planning Act.

h. The discouragement of urban sprawl.

- Section 163.3177(8) requires that future land use map amendments shall be based on an analysis of the availability of facilities and services, suitability of the plan amendment for its proposed use and an analysis of the minimum amount of land need to achieve the goals and requirements of Section 163.3177; and
- Section 163.3177(9) requires that the future land use element and any amendments to future land use element shall discourage the proliferation of urban sprawl.