

**Additional information relating to the Leon County/City of Tallahassee
Evaluation and Appraisal Report**

The statements below have three sections: 1) relevant Comprehensive Plan policies, 2) relevant information from the adopted EAR, and 3) additional information intended to clarify statements made in the adopted EAR.

POTABLE WATER

- 1) The Comprehensive Plan sets out the Level of Service Standards for potable water as follows:

Policy 1.2.2: [PW] (LOS Inside Urban Service Area) (Effective 7/16/90)

The level of service for potable water systems in the Urban Service Area shall be:

160 gallons per capita per day (GPCD) for average daily demand. This level of service includes residential, commercial, institutional, and industrial demands, and also unaccounted for water. This level of service is derived by dividing the total production by the service population.

In the design of water production, storage, and distribution facilities, appropriate peak and fire flow factors shall be utilized.

This is the adopted level and shall be used as the basis for determining the availability of facility capacity and the demand generated by a development.

Policy 1.2.3: [PW] (LOS Outside Urban Service Area) (Effective 7/16/90)

The level of service for potable water systems outside of the Urban Service Area shall be 100 gallons per capita per day (GPCD).

In the design of new water production, storage, and distribution facilities, appropriate peak and fire flow factors shall be utilized.

This is the adopted level and shall be used as the basis for determining the availability of facility capacity and the demand generated by a development outside of the Urban Service Area.

- 2) As stated on page 2-40 of the EAR,

The only...significant changes are to revise the currently adopted LOS standard for potable water and to make the necessary amendments relative to SB 360 or other statute/rule changes.

(NOTE: This statement is incorrectly placed only in the Sewer sub-element on page 2-41, when it might have been intended for inclusion in both sections.)

- 3) The City of Tallahassee water utility has experienced no deficiencies for potable water since the past EAR planning period. Talquin, a private water company, also provides water to residents in Leon County, primarily in more rural areas. The potable water system has significant capacity above the adopted LOS of 160 gpcpd. All new developments are assessed for impacts based on the adopted LOS.

Potable Water Capacity and Consumption Rates

	Residential Customers	Estimated service population*	Well Capacity MGD	Daily Average Consumption MGD	Capacity gallons per customer per day	Capacity gallons per capita per day	Consumed gallons per customer per day	Estimated consumed gallons per capita per day	Adopted LOS Inside USA	Adopted LOS Outside USA
1994	52,238	130,595	71.5	21.22	1369	547	406	162	160	100
1995	53,626	134,065	71.5	21.94	1333	533	409	164	160	100
1996	55,301	138,253	71.5	22.02	1293	517	398	159	160	100
1997	56,362	140,905	73.6	26.04	1306	522	462	185	160	100
1998	57,433	143,583	73.6	25.71	1281	513	448	179	160	100
1999	58,996	147,490	73.6	25.18	1248	499	427	171	160	100
2000	60,641	151,603	73.6	27.60	1214	485	455	182	160	100
2001	61,947	154,868	73.6	25.49	1188	475	411	165	160	100
2002	63,312	158,280	73.6	26.87	1162	465	424	170	160	100
2003	68,430	171,075	73.6	28.89	1076	430	422	169	160	100
2004	68,168	170,420	73.6	30.43	1080	432	446	179	160	100
2005	69,869	174,673	73.6	29.33	1053	421	420	168	160	100
2006	71,704	179,260	73.6	36.30	1026	411	506	202	160	100

Data is not available for inside/outside USA.

* Service population is estimated by using a multiplier of 2.5 (average household size in Tallahassee) with the number of residential customers. While the service population is estimated by using residential customers, the flow rates include all water usage, including commercial and unassigned usage.

There was a question as to whether the subsection in the proposed EAR describing "Recommended Amendments to the Sub-Element" was intentionally deleted. It appears as though the subsection contained no information relevant to changes to the sub-element, and was therefore deleted prior to the adopted EAR. The adopted EAR states that no changes to this sub-element are necessary (page 2-37) except to revise the currently adopted LOS Standard for Potable Water (this statement is incorrectly placed only in the Sewer sub-element on page 2-41, when it might have been intended for inclusion in both sections). The Planning Department does recommend changes to the potable water LOS to reflect the actual rate of consumption, after an evaluation of trends and analysis.

SEWER

- 1) The Comprehensive Plan sets out the Level of Service Standards for sewer as follows:

Policy 1.3.4: [SS] (Effective 7/16/90)

The LOS for sanitary sewer systems will be:

- a) 140 gallons per capita per day (GPCD) for average daily flow for systems serving mixed land uses;*
- b) 100 gallons per capita per day (GPCD) for average daily flow for systems serving only residential land uses.*

In the design of sewer collection, pumping, treatment, and effluent disposal facilities, appropriate peak factors shall be utilized. This is the adopted level and shall be used as the basis for determining the availability of facility capacity and the demand generated by a development.

- 2) As stated on page 2-40 of the EAR,

The only...significant changes are to revise the currently adopted LOS standard for potable water and to make the necessary amendments relative to SB 360 or other statute/rule changes.

[NOTE: This statement occurs in the Sanitary Sewer Sub-Element, and incorrectly references only potable water, when it should have referenced both potable water and sanitary sewer. Perhaps the author was making a link between potable water usage and sanitary sewer flow rates. Nonetheless, it was the intention of this sub-element assessment to recommend changes to the LOS, as described in section 3 below.]

3) The City of Tallahassee has experienced no deficiencies for sanitary sewer since in the past planning period, as demonstrated by the chart below.

Sewer Capacity and Flow Rates

	Residential Customers	Estimated service population*	Treatment Capacity MGD	Daily Average Flow MGD	Capacity gallons per customer per day	Capacity flow gallons per capita per day	Flow gallons per customer per day	Estimated flow gallons per capita per day	Adopted LOS Inside USA	Adopted LOS Outside USA
1994	43,572	152,502	24.6	19.24	564	161	442	126	140	100
1995	44,805	156,818	32.1	18.14	716	204	405	116	140	100
1996	46,282	161,987	32.1	16.59	693	198	358	102	140	100
1997	47,329	165,652	32.1	16.67	677	194	352	101	140	100
1998	48,248	168,868	32.0	16.06	663	189	333	95	140	100
1999	49,666	173,831	32.0	16.07	644	184	324	92	140	100
2000	51,041	178,644	32.0	17.48	627	179	342	98	140	100
2001	52,291	183,019	32.0	17.20	612	175	329	94	140	100
2002	54,972	192,402	32.0	16.59	582	166	302	86	140	100
2003	57,761	202,164	32.0	16.47	554	158	285	81	140	100
2004	58,413	204,446	32.0	16.61	548	157	284	81	140	100
2005	59,988	209,958	32.0	19.53	533	152	326	93	140	100
2006	61,747	216,115	32.0	17.24	518	148	279	80	140	100

Data is not available for inside/outside USA.

* Service population is estimated by using a multiplier of 2.5 (average household size in Tallahassee) with the number of residential customers. While the service population is estimated by using residential customers, the flow rates include all water usage, including commercial and unassigned usage.

The Planning Department notes an inconsistency among the statements made in the various sections of the EAR, relating to changing the LOS for sanitary sewer, and apologizes for the confusion. However, the Planning Department does recommend changes to the sanitary sewer LOS to reflect the actual rate of consumption, which is significantly below the adopted LOS. The significantly higher capacity rates, in comparison to the actual estimated consumption, is pronounced. In addition, an LOS significantly above the actual consumption contributes to an over-allocation of capacity and reduces the efficiency of concurrency and land use planning. However, current LOS consumption rates need to be analyzed together with weather patterns (including drought) and other relevant data, which will be evaluated prior to recommendations of specific changes to the adopted LOS.

DRAINAGE

1) The Comprehensive Plan sets out the Level of Service Standards for drainage as follows:

Policy 1.5.2: [SMJ] (Effective 7/16/90)

The design and water quality standards set forth in Florida Administrative Code Chapters 17-3 and 17-25, as the same may be amended from time to time, are hereby adopted by reference as the level of service for stormwater quality.

Local government may set higher minimum levels of treatment in watersheds where investigation and analysis indicate more stringent levels of service are required.

Stormwater management facilities shall be adequate to provide the following levels of service with regard to flood control:

100 Year Critical Storm Event

-- No flood water in new buildings or existing buildings.

-- Overland flow capacity available for all flow in excess of capacity of underground and open channel conveyance systems.

25 Year or Less Critical Storm Event

-- No flood water more than six inches deep in local roads, parking lots, or other non-street vehicular use areas.

-- No flood water in one driving lane each direction of collector streets.

-- No flood water in two driving lanes each direction on arterial streets.

-- Open channel conveyance capacity available for all flow in excess of capacity of underground conveyance system, or for full twenty-five year storm flow if no underground system exists.

-- The rate of off-site discharge shall not exceed the predevelopment rate of discharge.

10 Year or Less Critical Storm Event

-- No flood water in one driving lane of local roads.

-- No flood water in the driving lanes of any road other than a local road.

-- Underground conveyance not overflowing in business and commercial districts.

5 Year or Less Critical Storm Event

-- No flood water in the driving lanes of any roadways.

-- Underground conveyances not overflowing in residential districts.

These are the adopted levels of service and shall be used as the basis for determining the availability of facility capacity and the system demand generated by development. In instances where an off-site deficiency exists at the time of adoption of this policy, such be increased as the result of any development or land use changes.

2) As stated on page 2-86 of the EAR,

Stormwater: Standards have been adopted through the Environmental Management Ordinances for the City and County and are applied to all new private and public development. This information is presented in the Stormwater Sub-element.

3) The Stormwater Management adopted Level Of Service (LOS) establishes the 1990 conditions as the base LOS. The LOS objectives and policies require that new development and system modifications provide new capacity for on-site improvements that meet the service standards established in Policy 1.5.2. On-site capacity compliance is enforced through the Growth Management Department permit review process. The City and County do not grant permits for development that would negatively impact the LOS for each storm event on-site.

Developments that do not provide the required LOS are not allowed to proceed. Off-site stormwater discharges are allowed to use existing capacity, which is evaluated based on level of service standards in Policy 1.5.2. Where an existing deficiency exists, development must not make the deficiency any greater. Compliance is enforced through the Growth Management Department permit review process. The City and County do not grant permits for development that would negatively impact the LOS for each storm event on-site. Effectively, this means that the flood conditions today are the same as they were in 1990. Given that the City and County strictly maintain these standards on a site-by-site basis, the LOS has been achieved and maintained.

SOLID WASTE

- 1) The Comprehensive Plan sets out the Level of Service Standards for solid waste as follows:

Policy 1.4.2: [SW] (Effective 7/16/90)

The level of service (LOS) for solid waste shall measured in pounds/ capita/ day and be the following:

<i>Year</i>	<i>Los</i>	<i>Year</i>	<i>Los</i>	<i>Year</i>	<i>Los</i>	<i>Year</i>	<i>Los</i>
1990	5.65	1996	6.25	2001	6.70	2006	6.95
1991	5.75	1997	6.35	2002	6.75	2007	7.00
1992	5.85	1998	6.45	2003	6.80	2008	7.05
1993	5.95	1999	6.55	2004	6.85	2009	7.10
1994	6.05	2000	6.65	2005	6.90	2010	7.15
1995	6.15						

This level of service shall be used as the basis for determining the availability of facility capacity and the demand generated by a development.

- 2) As stated on page 2-27, 2-72 and 2-73 of the EAR,

Recommended Amendments to the Sub-Element

The Solid Waste Sub-Element requires numerous changes to reflect the current status of solid and hazardous waste management in Leon County, a well as the advent of numerous programs in both jurisdictions. The following amendments should be undertaken in response to this EAR:

- *Policies that have been fully implemented should be amended to maintain policy standards.*
- *The goal related to hazardous waste needs to refer to “materials management” rather than disposal.*
- *Objectives addressing landfill siting should be replaced with objectives describing disposal capacity.*
- *A hierarchy of management strategies should be incorporated into the Plan: Prevention, Reduction, Re-use, and Recycling, followed by Disposal.*
- *All policies relating to the siting of a future landfill can be eliminated. The contract with Jackson County lasts until 2008 and is anticipated to be readily renewed for the duration of the planning horizon (2030), although a contingency program should be identified.*

- *Per capita recycling goals need to be incorporated. These should increase over time and reflect the City's and County's enhanced efforts.*
- *Levels of Service need to reflect the terms of the Jackson County contract.*
- *Hazardous Waste policies currently in the Conservation Element (4.3 [C]) should be integrated into the management, education, and cleanup policies of the Solid Waste element.*
- *All dates should reflect the operational commitment of the solid waste departments.*
- *The economics of solid waste management need to be incorporated into policy (evolving recycling markets, tipping fees, residential and commercial rates).*

Solid Waste: The LOS standards for Solid Waste disposal capacity are inadequate as written. The pounds/capita provision is nebulous, and increasing rate of waste generation is in contradiction to the recycling objectives in the Solid Waste Element. These standards are addressed in detail within the Solid Waste Element.

The LOS for the Landfill and its capacity are no longer applicable. Leon County no longer operates an active Class I landfill, but it does have disposal capacity via long-term agreement with Waste Management, Inc. The County is currently four years into the 10-year agreement with WMI.

3) While the City of Tallahassee has not experienced any LOS deficiencies for solid waste during the past planning period, as shown in the chart below, it is the opinion of staff that the existing LOS standards do not adequately address planning goals for the next planning period. As demonstrated below, our operating Level of Service (pounds per capita per day) is significantly below the adopted LOS, indicating that solid waste production is significantly less per capita than expected at the beginning of the prior planning period. Our current contract does not limit solid waste pick-up; nevertheless, the City and County strive to further reduce solid waste production through education and policy, as supported by the Comprehensive Plan. Due to this, the capacity allowed under the adopted LOS is much larger than needed. Thus the EAR recommends (page 2-27) that LOS standards be modified to be more consistent with the goals of the Solid Waste Element and the current contract, and to expand the LOS horizon until 2030.

Waste Collected during Previous Planning Period

	Total Pounds per Year	Customer Count	Per Customer Per Day	Population Estimate*	Per Capita Per Day	Adopted LOS
1990	--	--	--	--	--	5.65
1991	209,293,160	--	--	--	--	5.75
1992	218,980,400	--	--	--	--	5.85
1993	225,888,400	--	--	--	--	5.95
1994	236,478,040	--	--	--	--	6.05
1995	243,980,800	--	--	--	--	6.15
1996	249,006,760	53,695	12.88	--	--	6.25
1997	249,582,280	54,447	12.73	143,396	4.77	6.35
1998	254,306,640	55,242	12.79	145,952	4.77	6.45
1999	248,774,140	56,186	12.30	148,776	4.58	6.55

2000	288,481,840	57,705	11.98	150,624	5.25	6.65
2001	302,970,360	58,636	14.35	153,658	5.40	6.7
2002	298,480,700	59,731	13.88	156,703	5.22	6.75
2003	313,089,241	59,903	14.52	162,310	5.28	6.8
2004	324,656,000	60,755	14.84	169,136	5.26	6.85
2005	325,481,460	61,892	14.61	174,781	5.10	6.9
2006	326,081,460	62,704	14.13	--	--	6.95
2007	--	--	--	--	--	7
2008	--	--	--	--	--	7.05
2009	--	--	--	--	--	7.1
2010	--	--	--	--	--	7.15

Source: US Bureau of the Census; University of Florida, Bureau of Economic and Business Research

RECREATION AND OPEN SPACE

1) The Comprehensive Plan sets out the Level of Service Standards for recreation and open space as follows:

Policy 1.1.1: [R] (Effective 7/16/90)

A system of countywide, area, and local parks shall continue to be maintained in accordance with the following minimum level of service acreage standards (measured in acres per 1,000 population):

Responsible Government	Type of Park		
	Countywide	Area	Local (Recommended)
<i>City</i>	<i>1.22</i>	<i>2.00</i>	<i>2.00</i>
<i>County</i>	<i>0.18</i>	<i>--</i>	<i>--</i>
<i>Federal/State</i>	<i>3.60</i>	<i>--</i>	<i>--</i>
Total	5.00	2.00	2.00

These facilities will be provided in the following manner:

a. City of Tallahassee area parks provision will be based on the urban service area population, and shall be located within the city limits so as to equitably serve the urban service area population.

b. County government will continue to be responsible for the operation and maintenance of boat landings and water-related parks at a standard of 0.18 acres/1,000 population.

c. Leon County shall annually budget appropriate funds, per the signed inter-local agreement, to be used by the City of Tallahassee Parks and Recreation Department in providing recreational services to the citizens of Leon County.

d. Level of Service for Areawide and Countywide parks shall be adopted for purposes of concurrency. LOS for local parks is a recommended level which primarily shall be used as a guideline for the provision of this type park in relation to new developments, per Policy 2.1.6 of the Land Use Element.

2) As stated on pages 2-59, 2-61 and 2-63 of the EAR,

Table 2-11. Approximate Levels of Service (as Acres/1,000 population) for 2006 by Type of Park

Responsible Government	----- Type of Park -----		
	Countywide	Area	Local (recommended)
City	7.94 (1.22)	4.98 (2.00)	Not Tracked (2.00)
County	0.48 (0.18)	n/a	n/a
Federal / State	397.17 (3.60)	n/a	n/a
Total	405.59 (5.00)	4.98 (2.00)	Not Tracked (2.00)

Current Adopted Levels of Service are included in parenthesis
 n/a: Not Applicable

County government does provide other park facilities in addition to the boat landings identified above. However, the County Parks and Recreation Division is relatively new and the Comprehensive Plan, and included LOS, has not been updated to reflect the existence of this increased service in the unincorporated county. Table 2-10 includes information on the current levels of service being provided by the County government.

Table 2-12. Park Facilities Provided by Leon County Based on the Population Estimate for 2006

Type of Park	Acres per 1000 Population	Total Acres
Active	1.25	122
Passive / Greenway	20.78	2036
Campgrounds	0.24	23
Boat Ramps	0.48	70

(Note: These figures are not included in the Levels of Service Table above because the Levels of Service were written prior to provision of such facilities by County government)

In October of 1996 Leon County created a Division of Parks and Recreation within the Public Works Department. This expansion has increased the services available to citizens in the unincorporated county. However, the existing Parks and Recreation Element does not recognize the existence of this new division. The County Parks and Recreation Division Director has identified several text amendments that will be needed to update the element.

The City Parks Superintendent and the County Parks and Recreation Director have recommended that new criteria for the LOS be developed. They are concerned that the current system is not a good measure of the services citizens require. As a result the LOS are not used as an internal planning tool and the concurrency management system is not able to ensure that new developments will not overwhelm the capacity of existing facilities and programs. The Planning Department will work with the departments to prepare a Comprehensive Plan Amendment for the 2007-2 amendment cycle.

Recommended Amendments to the Element

The following amendments should be undertaken in response to this EAR:

- Identify the text amendments needed to recognize the existence of a County Parks and Recreation Division.

- Develop new level of service indicators to more accurately measure the services citizens require, to ensure that new developments do not overwhelm the capacity of existing facilities and programs, and to improve their utility as a planning tool.

Review policies under objective 1.4 (cultural activities and facilities) and amended them to set new benchmarks or remove them.

3) The data and analysis for the 1990 Comprehensive Plan indicates a baseline of 10.9 acres per 1,000 population for Countywide parks (5.0 adopted LOS), and 2.4 acres per 1,000 population for area parks (2.0 adopted LOS). Furthermore, boat ramps are provided at a rate of .40 acres per 1,000 population, far above the 0.18 adopted LOS. As the tables provided in the EAR show, the City and County have provided far more recreation and open space than required by the adopted LOS standard. In addition, the tables below, on page 2-59 of the EAR, show that the rate of Countywide and Area provisions have doubled, when compared to the provisions identified in the 1990 data and analysis (Local, a "recommended" LOS is no longer tracked).

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Despite the fact that the City and County have far exceeded the adopted LOS for recreation and open space, the Planning Department recommends that the LOS be reviewed and modified to more accurately address the needs of citizens, protect existing facilities and programs, and reflect the importance of different types of recreation and open space facilities, such as active and passive recreation, greenways, campgrounds, etc.