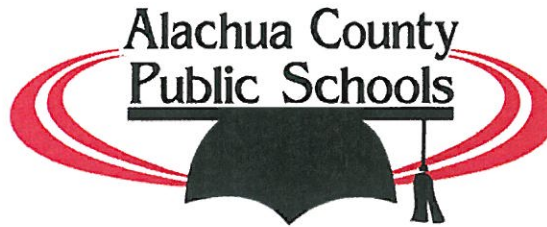


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January 14, 2016

Ken Zeichner, AICP
 Chief of Comprehensive Planning
 Alachua County Growth Management Department
 Gainesville, Florida 32601

RE: Envision Alachua Sector Plan – Plum Creek

Dear Mr. Zeichner:

In accordance with the Public School Facilities Element of the Alachua County Comprehensive Plan, we have reviewed the **Envision Alachua Sector Plan – Plum Creek**. The ACPS staff has provided a review of the Plum Creek EASP on several occasions including conferences with the developer's representatives. This analysis is based on the Alachua County staff analysis completed in November of 2015, the June 22, 2015 "Public Facilities Analysis" prepared by the EASP Review Team (EASP Report), the 2015-2016 Five Year District Facilities Plan adopted by the School Board on October 1, 2015 and the "2015 Student Generation Analysis (SGM)" performed by the University of Florida.

The review was conducted in accordance with the Alachua County Public School Facilities Element as follows:

POLICY 1.1.2: Coordinating School Capacity with Planning Decisions

Alachua County shall coordinate land use decisions rezonings with the School Board's Long Range Facilities Plans over the 5-year, 10-year and 20-year periods by requesting School Board review of proposed comprehensive plan amendments and rezonings that would increase residential density. This shall be done as part of a planning assessment of the impact of developmental proposals on school capacity.

POLICY 1.1.3: Geographic Basis for School Capacity Planning.

*For purposes of coordinating land use decisions with school capacity planning, the School Concurrency Service Areas (SCSAs) that are established for high, middle and elementary schools as part of the Interlocal Agreement for Public School Facility Planning shall be used for school capacity planning. **The relationship of high, middle and elementary capacity and students anticipated to be generated as a result of land use decisions shall be assessed in terms of its impact (1) on the school system as a whole and (2) on the applicable SCSA(s). For purposes of this planning assessment, existing or planned capacity in adjacent SCSAs shall not be considered. [emphasis added]***

POLICY 1.1.5: School Board Report to County

The School Board shall report its findings and recommendations regarding the land use decision to the County. If the School Board determines that capacity is insufficient to support the proposed land use decision, the School Board shall include its

recommendations to remedy the capacity deficiency including estimated cost. The School Board shall forward the Report to all municipalities within the County.

POLICY 1.1.6 County to Consider School Board's Report

The County shall consider and review the School Board's comments and findings regarding the availability of school capacity in the evaluation of land use decisions.

This review does not constitute a "concurrency determination" and may not be construed to relieve the development of such review at the final plat or final site plan stages as required by the Alachua County Comprehensive Plan. It is intended to provide an assessment of the relationship between the project proposed and school capacity – both existing and planned.

The EASP report provides a revised development program and timetable. This information is summarized in Table 1 below:

Table 1: EASP Proposed Development Program			
EASP Interim (5 Year)			
	SR 20 Jobs Center	US 301 Jobs Center	Total EA-EOMU
Single Family	0	0	0
Multi-Family	0	0	0
Total	0	0	0
EASP 2030 Program			
	SR 20 Jobs Center	US 301 Jobs Center	Total EA-EOMU
Single Family	1,500	0	1,500
Multi-Family	700	0	700
Total	2,200		2,200
EASP 2070 Buildout			
	SR 20 Jobs Center	US 301 Jobs Center	Total EA-EOMU
Single Family	3,000	2,240	5,240
Multi-Family	2,900	560	3,460
Total	5,900	2,800	8,700
Source: "Public Facilities Analysis-Envision Alachua Sector Plan", CHW Consultants, June 22, 2015			

In July 2015, ACPS commissioned the University of Florida in cooperation with DRMP, Inc to update the *Student Generation Multipliers (SGM)* originally developed in 2009. The result of this analysis is shown in Table 2 below.

Table 2: Student Generation Multipliers – 2015 Analysis

	Elementary	Middle	High
Single Family	0.15	0.07	0.09
Multi Family	0.08	0.03	0.03

Source: Alachua County Public Schools

EA-EOMU – Envision Alachua Economic Opportunity Mixed Use

Table 3 summarizes projected student generation at the Elementary, Middle and High levels.

Table 3A: EASP Elementary Student Generation			
EASP Interim (5 Year)			
	SR 20 Jobs Center	US 301 Jobs Center	Total EA-EOMU
Single Family	0	0	0
Multi-Family	0	0	0
Total	0	0	0
EASP 2030 Program			
	SR 20 Jobs Center	US 301 Jobs Center	Total EA-EOMU
Single Family	225	0	225
Multi-Family	56	0	56
Total	281	0	281
EASP 2070 Buildout			
	SR 20 Jobs Center	US 301 Jobs Center	Total EA-EOMU
Single Family	450	336	786
Multi-Family	232	45	277
Total	682	381	1,063
Source: Student Generation Multiplier			
Table 3B: EASP Middle Student Generation			
EASP Interim (5 Year)			
	SR 20 Jobs Center	US 301 Jobs Center	Total EA-EOMU
Single Family	0	0	0
Multi-Family	0	0	0
Total	0	0	0
EASP 2030 Program			
	SR 20 Jobs Center	US 301 Jobs Center	Total EA-EOMU
Single Family	105	0	105
Multi-Family	21	0	21
Total	126	0	126
EASP 2070 Buildout			
	SR 20 Jobs Center	US 301 Jobs Center	Total EA-EOMU
Single Family	210	157	367
Multi-Family	46	17	63
Total	256	174	430
Source: Student Generation Multiplier			

Table 3C: EASP High Student Generation			
EASP Interim (5 Year)			
	SR 20 Jobs Center	US 301 Jobs Center	Total EA-EOMU
Single Family	0	0	0
Multi-Family	0	0	0
Total	0	0	0
EASP 2030 Program			
	SR 20 Jobs Center	US 301 Jobs Center	Total EA-EOMU
Single Family	135	0	135
Multi-Family	21	0	21
Total	156	0	156
EASP 2070 Buildout			
	SR 20 Jobs Center	US 301 Jobs Center	Total EA-EOMU
Single Family	270	202	472
Multi-Family	87	17	104
Total	357	218	575
Source: 2015-2016 Five Year District Facilities Plan – Student Generation Multiplier			

Elementary Schools. The EASP-Plum Creek proposal directly impacts the Hawthorne CSA and the Waldo CSA. Capacity within these CSAs is provided by Shell Elementary and Waldo Community School respectively. Table 3 shows the capacity and enrollment relationships based on the 2014-2015 Five Year District Facilities Plan.

Table 4: Elementary Capacity / Enrollment				
CSA	Capacity	Enrollment		
		2015-2016	2019-2020	2024-2025
Hawthorne-Waldo	371	299	300	318
Available Capacity		72	71	53
Source: 2015-2016 Five Year District Facilities Plan				

Data (GIS) developed in May, 2015 shows that 4,067 single family dwellings and 328 multifamily dwellings currently exist within the Waldo CSA and Hawthorne CSA combined. Currently 494 elementary students reside within these CSA boundaries.

The closing of the Waldo Community School and its removal from the capacity inventory reduces the elementary capacity available for the EASP to 371 seats

Based on the timetable proposed for the EASP-Plum Creek project, there will be no impact on elementary schools during the first five years. The EASP 2030 program is projected to generate 281 elementary students. The 2070 Buildout is projected to generate of total of 1,063 elementary students.

Middle Schools. The EASP-Plum Creek proposal directly impacts the Hawthorne CSA. Table 5 shows the capacity and enrollment relationships based on the 2015-2016 Five Year District Facilities Plan.

Table 5: Middle Capacity / Enrollment				
CSA	Capacity	Enrollment		
		2015-2016	2019-2020	2024-2025
Hawthorne	178	122	135	135
Available Capacity		56	43	43
Source: 2015-2016 Five Year District Facilities Plan				

Data (GIS) developed in May, 2015 shows that 4,067 single family dwellings and 328 multifamily dwellings currently exist within the Hawthorne CSA. Currently 209 middle students reside within the CSA boundary.

Based on the timetable proposed for the EASP-Plum Creek project, there will be no impact on middle schools during the first five years. The EASP 2030 program is projected to generate 126 middle students. The 2070 Buildout is projected to generate of total of 430 middle students.

High Schools. The EASP-Plum Creek proposal directly impacts the Hawthorne CSA. Table 6 shows the capacity and enrollment relationships based on the 2015-2016 Five Year District Facilities Plan.

Table 6: High Capacity / Enrollment				
CSA	Capacity	Enrollment		
		2015-2016	2019-2020	2024-2025
Hawthorne	504	171	166	184
Available Capacity		333	338	320
Source: 2015-2016 Five Year District Facilities Plan				

Data (GIS) developed in May, 2015 shows that 3,982 single family dwellings and 321 multifamily dwellings currently exist within the Hawthorne CSA. Currently 223 high students reside within the CSA boundary.

Based on the timetable proposed for the EASP-Plum Creek project, there will be no impact on high schools during the first five years. The EASP 2030 program is projected to generate 156 high students. The 2070 Buildout is projected to generate of total of 575 high students.

Summary Conclusions

The EASP – Plum Creek project will over time significantly increase the need for public school facilities in the eastern portion of Alachua County and specifically within the respective elementary, middle and high Concurrency Service Areas. Based on the development program and timetable, no impact is expected within the ten-year planning period. During the 10 to 20 year time frame, the project will contribute to the need for expanded elementary and middle capacity. The 2070 Buildout will create a need for expanded capacity at all levels.

As noted by the Alachua County staff report, the calculations submitted by the developer are in error related to available capacity to be considered. Notably, only capacity within the CSA may be considered for comprehensive plan and rezoning reviews. Table 7 below provides a correction to Table 7B and Table 7C contained in the *"Public Facilities Analysis – Envision Alachua Sector Plan Report"*¹.

Table 7B: 2030 Projected Public School Facility Needs (Corrected)					
School Type	Available Capacity	Student Generation	Capacity Demand	Required Sites	Required Acres
Elementary	53	281	228	1	20
Middle	43	126	83	1	35
High	320	156	-164	0	0
Total	416	563	147	2	55
Source: Alachua County Public Schools					

Table 7C: 2070 Projected Public School Facility Needs (Corrected)					
School Type	Available Capacity	Student Generation	Capacity Demand	Required Sites	Required Acres
Elementary	53	1,063	1,010	2	40
Middle	43	430	387	1	35
High	320	575	255	1	65
Total	416	2,068	1,652	4	150
Source: Alachua County Public Schools					

It is unrealistic to project the timing of capacity expansions for a long term buildout such as that proposed for the EASP-Plum Creek proposal. In contrast, the need for school sites can be anticipated and proactively identified and protected as master plans are developed and actual development progresses.

¹ "Public Facilities Analysis – Envision Alachua Sector Plan", June 22, 2015, CHW Consultants, pgs. 27-28

The evaluation documented above supports the following recommendations:

Recommendation #1 – Two elementary sites should be designated. The first should be located within SR 20 Jobs Center. The second site should be located within US 301 Jobs Center.

Recommendation #2 – One middle school site should be designated. Preferably, this site is located within SR 20 Jobs Center and available during the 10 – 20 year time period.

Recommendation #3 – One high school site may be required. Further evaluation is necessary regarding its location and timing.

Recommendation #4 – All sites should satisfy Alachua County Public School specifications and meet the siting criteria established by the Interlocal Agreement.

Recommendations #5 – School sites should be shown on master plans and dedicated through the provisions of three-party Capacity Enhancement Agreements (developer, Alachua County and Alachua County Public Schools).

The proposed comprehensive amendment for the EASP **does not adequately capture the specifics of the above recommendations with regard to the number and general location of school sites nor the process for implementation.** It is recommended that this language be modified to mandate that required sites be identified during the DSAP / rezoning process and implemented through a capacity enhancement agreement executed commensurate with such approval.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Vicki McGrath', with a long horizontal flourish extending to the right.

Vicki McGrath
Director of Community Planning
Alachua County Public Schools