

Special Concurrency Analysis

Based on City of Key West Levels of Service Standards

Wisteria Island, Monroe County

EXECUTIVE SUMMARY

This Concurrency Management Analysis was performed to understand the potential effects of the proposed map designation and text amendment of Wisteria on the City of Key West. The proposed designation is compatible with, yet significantly less intense than, the existing surrounding land uses.

The property is unique in the respect that Wisteria does not have a Future Land Use Map designation. All areas of concurrency are addressed for potential impacts. Specific levels of service (LOS) issues have been analyzed. However, given its lack of current designation we are unable to run comparative analyses and instead employed a Hypothetical Maximum Impact Analysis. Calculations are weighted using a hypothetical maximum impact with functional occupancies and maximum occupancies (where appropriate) and then potential system capacities are estimated to determine concurrency.

The following analysis demonstrates the urban services potentially needed as a result of the proposed FLUM designation and text amendment can be provided concurrent with any development.

TABLE OF CONTENTS

- Data Sheets 3
- Density/ Intensity 4
- Utility Transmission 5
- Transmission Overview 5
 - Anticipated System Upgrades 5
 - Funding Source 5
- Sanitary SEWER & Potable Water 6
 - Sanitary Sewerage System Level of Service 6
 - Potable Water Level of Service 6
- Solid Waste 8
 - Solid Waste Level of Service 8
 - Handling Process 9
 - Anticipated System Upgrades 9
 - Funding Source 9
- Roads/Trip Generation 11
 - Roads/Trip Generation Level of Service 12
 - Trip Generation Calculations 12
 - Residential/ Transient 12
 - Non Residential 12
 - Mooring Field 12
 - Parking 12
- Other Issues 13
 - Harbor Impacts 13
 - Life – Safety Impacts 13
- Summary Evaluation 13

Key West Comprehensive Plan **OBJECTIVE 9-1.5: CONCURRENCY MANAGEMENT** mandates “that facilities and services needed to support development are available concurrent with the impacts of such development” and requires a determination of concurrency be made prior to a development order or permit that authorizes the “commencement of construction or physical activity”.

The proposed Future Land Use designation for Wisteria does not authorize the commencement of construction or physical activity. Notwithstanding, Policy 9-1.5.1 requires a demonstration that the urban services needed by a “proposed development can and will be provided concurrent with the development.”

Existing Future Land Use Designation Impacts:

Wisteria has no Future Land Use designation and therefore upland impact calculations based on the current designation would be inaccurate and lack validity. Therefore, such calculations are omitted from the following analysis. The mooring-related impacts however, currently exist and therefore are accommodated in the analysis.

Data Sheets:

Population based on Occupancy Rates				
Use	No. of Units	People/ Unit	Occupancy rate	Total population
SF	35.0	2.4 ¹	0.7 ²	58.8
Transient	35.0	2.63 0 ³	0.8 ⁴	72.884
Affordable	5.0	2.4 ⁵	1.0 ⁶	12.0
Moorings on Owned Bay Bottom	57	1.5 ⁷	0.3 ⁸	25.7
Moorings Leased Bay Bottom	59.0	1.5	0.3	26.6
Population Total				195.8207
Population – Maximum Occupancy				
Use	No. of Units	People/ Unit⁹	Occupancy rate	Total population
SF	35	2.4	1.0	84
Transient	35.0	2.63 0	1.0	91.0105
Affordable	5.0	2.4	1.0	12.0
Moorings on Owned Bay Bottom	57.0	1.5	1.0	85.5
Moorings Leased Bay Bottom	59.0	1.5	1.0	88.5
Population Total				364.375

DENSITY/ INTENSITY

¹ Average owner-occupied household size in Key West, according to US Census

² Occupancy in Key West per US Census data

³ Based on an average of 1.25 people per bedroom room at Sunset Key and a mix of suite-style rooms

⁴ Transient Occupancy in Key West per Mo. Co. TDC data

⁵ Average owner-occupied household size in Key West, according to US Census

⁶ Applicant assumes employee housing occupancy at 100%

⁷ Assumes 1.5 people per mooring (note: Live-aboards are not permitted on State Lands)

⁸ Based on average mooring ball occupancy rates provided by the Harbor Masters of the City Marina at Garrison Bight and Boot Key Harbor Marina

⁹ Assumptions are the same as “Population Based on Occupancy” table above

The proposed amendments place the following caps on the potential development rights of Wisteria:

- 35 non-transient residential units
- 35 transient residential units
- 5 workforce housing units
- 39,500 sq. ft. of non-residential floor area¹⁰
- ±100 moorings

Non-transient residential density:

$$40 \text{ units} / 21.3 \text{ acres} = 1.8 \text{ units/ acre}$$

Transient Residential Density:

$$35 \text{ units} / 21.3 \text{ acres} = 1.6 \text{ units/acre}$$

Transient and Non-transient residential density combined:

$$75 \text{ units} / 21.3 \text{ acres} = 3.5 \text{ units/acre}$$

Non-residential floor area ratio:

$$39,500 \text{ sq. ft.} / 927,828 \text{ sq. ft.} = 0.04$$

Under the proposed amendment the total density shall be capped at 75 units or 3.5 units per acres. As a comparison, the permitted densities of the two adjacent future land use categories in the City of Key West, HRCC-1 and HPRD are 22 units per acre. The actual density of the adjacent land uses as demonstrated in the Port and Waterfront Use Compatibility Analysis by Trepanier & Associates, 2008 is much higher.

Under the proposed amendment the total non-residential FAR shall be capped at 39,500 sq. ft. (0.04). As a comparison, the permitted FAR of the two adjacent future land use categories in the City of Key West, HRCC-1 and HPRD is 1.0. The actual FAR as demonstrated in the Port and Waterfront Use Compatibility Analysis by Trepanier & Associates, 2008 is much higher.

¹⁰ “*Nonresidential floor area* means the sum of the gross floor area for a nonresidential building or structure, as defined in section 101-1, any areas used for the provision of food and beverage services and seating, whether covered or uncovered, and all covered, unenclosed areas. Walkways, stairways, entryways, parking, and loading areas are not considered floor area.” – MCC Sec. 138-47

UTILITY TRANSMISSION

Transmission Overview:

The proposed FLUM Designation will allow potential development requiring utilities services including water supply for potable uses and fire protection, wastewater collection and transmission, plus power and communications. The Florida Keys Aqueduct Authority provides water service and the City of Key West furnishes sanitary sewer service and treatment in this area.

The most feasible method for extending services to Wisteria Island is via subaqueous installation of utility connections from existing Sunset Key. These connections are already in place for services connecting Sunset Key to the main Key West Island. Various methods of construction would be evaluated including directional boring or other methods insuring protection of utilities from activity in the public navigation channel, visé versa.

Anticipated System Upgrades:

The potable water and sanitary sewer mains servicing Sunset Key contain the necessary capacity for adding Wisteria Island. However, ancillary improvements on Wisteria Island will consist of the following:

- Sewage pumping station to provide wastewater transmission from Wisteria Island to the connecting utility at Sunset Key and eventually to Key West main island.
- Potable water storage and repumping facilities with sufficient capacity for emergency storage for potential interruptions in service and equalizing storage to meet fluctuations in daily demand.
- A separate fire protection system for hydrant flow and indoor building sprinkler systems to meet local fire codes. Similar to Sunset Key, this could be a separate system charged with fresh water but fed by a saltwater fire pump plus storage as necessary.
- Emergency power source for operation of the above facilities during significant power interruptions.

Currently Sunset Key has a recycle pick up as needed, which normally means once per week. We anticipate combining the recycling from Wisteria into the existing system which could increase the frequency of pick up. All necessary contract adjustments will be made.

Funding Source:

All fees associated with anticipated system upgrades will be born by the owners of Wisteria.

SANITARY SEWER & POTABLE WATER

Sanitary Sewerage System Level of Service:

Residential Uses: 100 gallons per capita per day for permanent residents and 90 gallons per capita per day for seasonal residents

Non-Residential Uses: 660 gallons per acre per day

The total capacity required for the maximum non-seasonal residential uses is:

$$100 \text{ gal/capita/day} \times 181 \text{ people}^{11} = 18,100 \text{ gal/day}$$

The total capacity required for the maximum seasonal residential uses is:

$$90 \text{ gal/capita/day} \times 191.5 \text{ people}^{12} = 17,235 \text{ gal/day}$$

The total capacity required for the maximum nonresidential development of 0.906 acres of floor area is:

$$660 \text{ gal/acre/day} \times 0.906 \text{ acres} = 598 \text{ gal/day}$$

The total transmission capacity required for the maximum development of Wisteria is:

$$18,100 \text{ gal/day} + 17,235 \text{ gal/day} + 598 \text{ gal/day} = 35,933 \text{ gal/day}^{13}$$

The Richard A. Heyman Environmental Protection Facility advanced waste water treatment plant has the available capacity to accommodate the potential impacts resulting from the proposed map designation. The current wastewater treatment plant has treatment capacity for 10 million gallons per day. Only 4.8 million gallons per day of capacity are currently utilized.

Potable Water Level of Service:

Residential Uses: 93 gallons per capita per day

Non-Residential Uses: 650 gallons per acre per day

The total capacity required for the maximum residential uses is:

$$93 \text{ gal/capita/day} \times 375 \text{ people}^{14} = 34,875 \text{ gal/day}$$

¹¹ Population based on the non seasonal population including non-transient market rate units, workforce housing units, and mooring balls over owned bay bottom

¹² Population based on the non-seasonal population including non-transient market rate units, workforce housing units, and mooring balls over owned/leased bay bottom

¹³ It is important to note that this number does not include a deduction for current moorings, because records show that pump out is not occurring around Wisteria and the applicant's assumption, supported by visual evidence, is that the current moored vessels pump/dump their sanitary waste overboard into the near shore waters.

¹⁴ Population based on the non-seasonal population including non-transient market rate units, workforce housing units, and mooring balls over owned bay bottom all residential uses.

The total capacity required for the maximum nonresidential development of 0.906 acres of floor area is:

$$650 \text{ gal/acre/day} \times 0.906 \text{ acres} = 589 \text{ gal/day}$$

The total transmission capacity required for the maximum development of Wisteria is:

$$\underline{34,875} \text{ } \underline{\del{33,573}} \text{ gal/day} + 589 \text{ gal/day} = \underline{\del{34,162}} \underline{35,464} \text{ gal/day}$$

The total supply capacity required for the maximum development of Wisteria is:

$$\underline{34,875} \text{ } \underline{\del{33,573}} \text{ gal/day} + 589 \text{ gal/day} - 16,182 \text{ gal/day}^{15} = \underline{\del{17,980}} \underline{19,282} \text{ gal/day}$$

The Florida Keys Aqueduct Authority (“FKAA”) has adequate supply capacity to serve the potential development. FKAA has ~~obtained all necessary permits and is in the process of constructed~~ ~~constructing~~ facilities on the mainland in Florida City to expand water supply for the Florida Keys. This permitted and ~~under construction~~ ~~constructed~~ improvement ~~will~~ enables FKAA to provide over 23 MGD ~~by July 2010~~, which will provide sufficient capacity through 2022¹⁶. ~~Once e~~Operational in 2010, ~~athe~~ ~~permitted-recent~~ expansion of the R.O. plant will provide 6.0 MGD, which combined with the 17.0 MGD permitted withdrawal from the Biscayne Aquifer, ~~will~~ ~~increased~~ available water supply to 23 MGD for the Florida Keys.

Expanded Florida City R.O. Plant. The Department of Health issued Permit # 150092-007-wc/04 (Exhibit I) on November 14, 2006 to allow for the construction of an expanded reverse osmosis (R.O.) water plant in Florida City. The expanded water plant ~~will be~~ ~~is~~ designed to treat blended Floridian Aquifer water as an alternative water source to the Biscayne Aquifer. The permit design capacity of the expanded R.O. plant is 6 MGD.

Revised Water Use Permit. The SFWMD issued revised Water Use Permit (WUP) #13-00005-W (Exhibit II) on March 26, 2008, which recognizes the additional blended Floridian Aquifer capacity that will be provided by the expanded R.O. plant. Interim Water Use Allocations in the WUP permit provide FKAA with an allocation of 17.00 MGD (dry season) and 17.79 GPD (wet season) which may be withdrawn from the Biscayne Aquifer and allows FKAA to utilize the Stock Island and Marathon Reverse Osmosis plants for any demands exceeding the interim withdrawal limit, pending completion of the R.O. plant in Florida City. The Stock Island and Marathon R.O. plants have a combined capacity of 3.0 MGD providing an interim WUP water supply of 20.0 MGD during the dry season if needed. Once operational in 2010, the R.O. plant will provide an additional 6.0 MGD, which when combined with the 17.0 MGD permitted withdrawal from the Biscayne Aquifer, will increase available water supply to 23 MGD for the Florida Keys.

The interim allocation of 20 MGD (7,300 MG/year) through 2010 and 23 MGD after 2010 provides ample water supply to support the adopted amendment and allocated growth well beyond 10 years. The “Monroe County 2007 Annual Public Facilities Report” documents historic water use in the Florida Keys. Water demand has fluctuated significantly on an annual basis, however when evaluated over a ten-year period, the data shows an increase in water demand of more than 1 billion gallons over the last 10

¹⁵ The supply capacity is less than transmission capacity because the supply is already impacted by the existing moorings. According to interviews with moored residents, potable water is currently obtained from the Key West Bight which is served by the FKAA source.

¹⁶ Excerpt from Analysis by Kenneth B. Metcalf, AICP, (Greenberg Traurig, P.A.), August 22, 2008.

years with an annual average increase of approximately 104 MG/year. This increase in demand can be shown in the following calculation:

1996 annual water demand = 5,272 MG /year

2006 annual water demand = 6,310 MG /year

Average Annual Increase = (6,310 MG - 5,272MG)/ 10 = 103.8 MG /year

Based on the average annual increase of 103.8 MG per year, the interim allocation would be sufficient for an additional 9.5 years of growth beyond 2006 or through 2015 until demand reaches the interim permitted withdrawal of 20 MGD (7,300 MG/year). ~~Upon~~ Since completion of the Florida City facilities, the 23 MGD allocation ~~would be~~ is available to support yet another 9.5 years of growth. Based on these findings, sufficient permitted water supply is available to meet the needs of the Florida Keys through 2024.

Improvements Schedule/Status. Condition 30 of the WUP provides ~~the following time schedule for construction of~~ the R.O. plant and the associated Floridian deep wells that will provide 23 MGD of capacity through 2024:

- DEP Underground Injection and Control permit was obtained on May 21, 2008.
- Construction contracts were required within 180 days or by November 21, 2008;
- Testing is required within one year and 30 days from issuance of the permit or by June 21, 2009.
- The R.O. plant construction ~~is scheduled for completion by December 31, 2009 and the R.O. plant will be operational no later than 2 years and 60 days from the issuance of the DEP permit or by July 21, 2010.~~ was completed in January, 2010.

SOLID WASTE

Solid Waste Level of Service:

Solid waste handling will not impact the City of Key West's solid waste handling system. Wisteria, like Sunset, will be handled commercially. Commercial handling is by private contract between the user and a licensed waste hauler.

Applying the Key West LOS for solid waste we calculate the following capacities:

Residential Uses: 2.66 lbs per capita per day

Non-Residential Uses: 6.37 lbs per capita per day

The occupancy-rate based capacity required for the residential uses is:

$$2.66 \text{ lbs/capita/day} \times \del{196} \underline{207} \text{ people} = \del{521} \underline{551} \text{ lbs/day}$$

The occupancy-rate based capacity required nonresidential uses is:

$$6.37 \text{ lbs/acre/day} \times 73 \text{ people}^{17} = 465 \text{ lbs/day}$$

Total occupancy-rate based capacity required:

$$\del{521} \underline{551} \text{ lbs/day} + 465 \text{ lbs/day} = \del{986} \underline{1,016} \text{ lbs/day}$$

According to the Monroe County Facilities Capacity report, there is adequate solid waste capacity for the next 8 years of new development. Any potential development on Wisteria, will not add to the solid waste stream because no new units will be created. All units will be transferred from existing or previously existing units. The City of Key West also has approximately 30% excess solid waste capacity, according to the Key West Utilities Manager, and with increased recycling, the City expects that excess capacity to increase.

Handling Process:

In this case, handling will programmatically mirror that of Sunset Key. Sunset contracts with Waste Management for a single compactor for household and restaurant waste, a roll-off dumpster for yard waste. The containers are housed on Sunset Key. Recycling is handled internally with pick up on an as needed basis. A Waste Management truck is ferried to the island on an as needed basis (usually once per week) where it deposits an empty compactor and roll-off dumpster. The truck retrieves the full units and is ferried back across the harbor. The truck hauls the trash to Rockland Key, where it is transferred and hauled to the Mainland.

Anticipated System Upgrades:

Currently Sunset Key has a recycle pick up as needed, which normally means once per week. We anticipate combining the recycling from Wisteria into the existing system which could increase the frequency of pick up. All necessary contract adjustments will be made.

Funding Source:

All fees associated with solid waste handling will be born by the owners of Wisteria.

¹⁷ Based on industry standard of one employee per occupied room.

ROADS/TRIP GENERATION

Roads/Trip Generation Level of Service:

Roadway Facilities	Segment	1993-210	
State Urban Principal Arterials	U.S. 1	D	A = Free flow B = Reasonably free flow C = Stable flow D = Approaching unstable flow E = Unstable flow F = Forced or breakdown flow
	N. Roosevelt Blvd.	D	
	Truman Ave.	E	
	Whitehead St.	E	
County Urban Minor Arterials		D	
County Urban Collectors		D	
City Urban Collectors		D	

Trip Generation Calculations:

Trip Generation	ITE # Land Use Classification	Amount	Trip Rate	Total Weighted Vehicle Trips per Day
Residential				
Single Family	Residential Planned Unit Development (ITE Class No. 270)	35.0	7.5	55.1 ¹⁸
Transient	All Suites Hotel (ITE Class No. 311)	35.0	6.2	45.5 ¹⁹
Employee Housing	Apartment (ITE Class No. 220)	5.0	6.7	16.8 ²⁰
Residential Total				117.4
Non-Residential				
Restaurant	Quality Restaurant (ITE Class No. 931)	4,000.0	90.0	179.9 ²¹
Bar	Drinking Place (ITE Class No. 936)	1,600.0	11.3	4.5 ²²
Harbor Master (ac)	(ITE Class No. 420)	0.1	20.9	2.09
Non Residential Total				186.5
Total Residential & Non-Residential Trips²³				303.9

Current levels of service for Key West roadways were not available at the time of this analysis.

As reported in the County's staff report, "Trip generation estimates are based on the closest categories to Mooring Field and categories matching the maximum. The ITE numbers were weighted to more closely represent the nearly closed system Wisteria Island represents.

¹⁸ Experience at Sunset Key demonstrates less than 30% of the residents have a vehicle in Key West

¹⁹ Experience at Sunset Key demonstrates less than 30% of the guests come to the resort with a vehicle

²⁰ ITE studies are based on a mainland suburban environment. Given the closed system aspect of Wisteria, applicant anticipates off-island trips to be reduced by approximately 50%.

²¹ Experience at Sunset Key where approximately 50% of the restaurant trips are internal (i.e. guests of the resort and residents of the island constitute approximately 50% of the clientele of the restaurant and do not generate off-island trips

²² Experience at Sunset Key where approximately 75% of the bar trips are internal (i.e. guests of the resort and residents of the island constitute approximately 75% of the clientele of the bar and do not generate off-island trips

²³ Trips, per industry standards, constitute all trips whether they are by foot, bike, dinghy, private boat, water taxi, automobile, bus, etc. Therefore it is important to consider that the total number of trips can be reasonably expected to be multi-modal (i.e. spread among various types of transportation modes and various points of departure and arrival)

The weighting system used reflects the occupancy approach itemized in the table ~~below~~ [above] and internal trips using available knowledge and experience from the adjacent Sunset Key.”

Residential/ Transient:

As reported in the County’s staff report, “Proposed dwelling units would be located on Wisteria Island, so all trips to and from the Island will be accommodated within multi-modal context, with the majority of trips likely to occur within the existing water taxi service currently operated by the managers of Sunset Key. The Sub-Area Policy requires residential and transient units to be transferred to Wisteria from other locations. Therefore, given that no new units will be created, no increase in overall trip generation will result County-wide; notwithstanding, there will be a relocation of trips from the current or previous location of the units to Wisteria Island. As previously mentioned the trips associated with the units, which were previously, presumably, primarily land based trips will become multi-model trips spread across land and water with a variety of origination and departure points.” The total per day trips at maximum potential development is estimated at 117.

Non Residential:

The potential trip generating non-residential floor area is an allowance for a bar and restaurant. Again all access to the island will be by private boat or water taxi service. Therefore the total per day trips resulting from non-residential floor area is estimated at 304

Mooring Field:

No new impacts are anticipated. As part of the Fish & Wildlife Pilot Mooring Field Program, we have begun monthly surveys of the illegally moored vessels around Wisteria. Data for the March 2010 reveal 106 vessels currently moored, 65 of which are liveaboards. Formalizing and controlling the mooring of vessels around Wisteria will create no additional transportation impacts above those already included in the level of service calculations of both Monroe County and The City of Key West.

Parking:

The mooring field impacts with regard to parking will not change as a result of this designation. The parking impacts already exist and as such should be accounted for in both the County’s and the City’s Public Facilities Capacity Reports. We know from experience at Sunset Key, that few residents keep vehicles in Monroe County or the City of Key West. Parking for Sunset is accommodated within a parking structure at the Westin. This structure has ± 100 space excess capacity that could be used in association with development at Wisteria. Parking for the private boaters is already accommodated dock-side as required by both the Key West and County codes.

Additionally, the County’s Development Review process requires appropriate traffic and parking studies be performed at the time of development review.

OTHER ISSUES:

Harbor Impacts

No physical structures are proposed to impact the harbor or the navigational channel.

Life-Safety Impacts

Currently the life-safety impacts of Wisteria are extensive. Data available from 2003-2008 shows an average of 37 calls per year. However, once the FLUM is adopted and on-island activity commences, life-safety impacts are expected to closely approximate that of Sunset Key, which averages 8 calls per year. The responding agencies for Wisteria are predominantly the County Sheriff, USFW, US Border Patrol. Any responses by the City of Key West would be governed by the existing mutual aid memorandum of understanding.

Wisteria Life-Safety Call Summary

Wisteria Call Summary	
Year	No. of Calls
2003	21
2004	36
2005	28
2006	67
2007	28
2008	40

Area Check
 Abandoned Boat
 Abandoned Vehicle
 Abuse - Elderly
 Aircraft Patrol
 Armed and/or Caution
 Assault/Battery
 Assist Other Agency
 Assist Public
 Battery

Boat Citation	Gas Leak/Fire	Sea Turtle
Boat Fire	Grounded Boat	Special Detail
Boating Incident	Incident	Special Duty
Boating Inspection	Lobster	Stolen Vehicle
Brush/ Trash Fire	Lost/Found Property	Suspicious Activity
Derelict Boat	Marine Violation	Suspicious Incident
Derelict Vessel	Medical Assist/Fire	Suspicious Person
Disabled Vehicle	Miscellaneous	Theft
Disturbance	Navigational Hazard	Threats
Domestic Violence	Off-Duty	Traffic Stop
EMS Call	Employment	Trespass Follow Up
En Route Water Patrol	Office Time	Trespassing
Federal Water Patrol	Pass-On	Turtle
Fire Call	Police Service	Vehicle Crash
Fire-Structure	Required	Vessel Stop
Follow Up	Reckless Boat	Vessel Theft
Investigation	Record	Warrant Service
	Saltwater Species	

Sunset Life-Safety Call Summary

Sunset Call Summary	
Year	No. of Calls
2005	10
2006	9
2007	9
2008	7
2009	3

Alarm	Special Event
Armed Person	Suspicious Incident
Domestic	Suspicious Vehicle
Fire Call	Theft
Foot Patrol	Traffic Stop
Miscellaneous	Trespass
Obscene/Harassment	Vessel Stop
Public Assist	Warrant
Sick/ Injured	Water Assignment
Special Check	

SUMMARY EVALUATION

Policy 9-1.6.3: Evaluation Criteria for Plan Amendments. Proposed Plan amendments and requests for new development or redevelopment shall be evaluated according to the following guidelines:		Compliance	
a.	Does the proposed action contribute to a condition of public hazard as described in the Public Facilities and/or Coastal Management Elements;	No –	In Compliance
b.	Does the proposed action exacerbate any existing condition of public facility capacity deficits, as described in the Transportation Circulation, Public Facilities, and/or Recreation and Open Space Elements;	No –	In Compliance
c.	Does the proposed action generate public facility demands that may be accommodated by capacity increases planned in the Five-Year Schedule of Improvements;	No –	In Compliance
d.	Does the proposed action conform with the future land uses designated on the Future Land Use Map within the Future Land Use Element;	Yes –	In Compliance
e.	Does the proposed action comply with and accommodate public facility demands based on the adopted level of service standards contained herein;	Yes –	In Compliance
f.	If the proposed action requires that any public facilities be provided by the City, there shall be a demonstration of financial feasibility; and		All fees associated with Anticipated System Upgrades will be born by the owners of Wisteria – In Compliance
g.	Does the proposed action impact facility plans of any State agencies or facility plans of the South Florida Water Management District.	No –	In Compliance
h.	Does the proposed action have adverse impacts on natural and environmental resources, including near shore waters, the reef tracts, and marine resources.	No –	In Compliance