

EXECUTIVE SUMMARY

PETITION CPSP-2007-7, School Concurrency Growth Management Plan amendments – Capital Improvement and Intergovernmental Coordination Elements, new Public School Facilities Element and support document – and Public School Facility Planning and School Concurrency Interlocal Agreement (Transmittal Hearing)

OBJECTIVE:

To have the Board of County Commissioners (BCC) review amendments to the Capital Improvement and Intergovernmental Coordination Elements, a new Public School Facilities Element and support document, and an Interlocal Agreement for Public School Facility Planning and School Concurrency (ILA) to implement school concurrency, and to consider approving these amendments and ILA for transmittal to the Florida Department of Community Affairs.

CONSIDERATIONS:

The 2005 Florida Legislature, in Senate Bill 360, enacted legislation amending Sections 163.3180 and 163.3177, F.S., requiring the implementation of public school concurrency throughout the state of Florida. Program implementation will require coordinated planning among the County, the three municipalities, and the District School Board, the result of which will be a collaborative and financially feasible process to ensure that adequate school capacity is available at the time of residential impact.

Pursuant to State requirements, Collier County must adopt a school concurrency program that is internally consistent with the Collier County Growth Management Plan no later than March 1, 2008. Thereafter, the County will be required to incorporate the adopted Growth Management Plan amendments (GMPAs) into its Land Development Code, within one year from the effective date of the School Concurrency GMPAs.

The general requirements for school concurrency are provided below. (Please refer to the CCPC Staff Report, included in the binder of materials, for a more detailed list of statutory requirements.)

- Interlocal Agreement (ILA) – Local governments and the School District are required to update their existing ILAs, consistent with Sections 163.31777 (2) and 163.3180 (13)(g), F.S. The ILA assures a uniform concurrency system throughout the District and serves as a guide for the development of the Public School Facilities Element. The ILA requires consensus by the District School Board and local governments on: a level of service standards (LOSS); concurrency service areas (CSAs); maximum utilization of capacity; options for proportionate share mitigation; adoption of the School District’s financially feasible five-year Capital Improvement Program (CIP); and implementation and amendment procedures.

Level of Service Standard (LOSS)

Florida Statutes:

- a. Require the application of the LOSS districtwide to all schools of the same type
- b. Allow the use of a different LOSS for each school type
- c. Require that the LOSS be incorporated into the local government's CIE
- d. Allow school districts and local governments to use a tiered LOSS to allow time to achieve an adequate and desirable LOSS

School District's proposal:

The School District has proposed a districtwide LOSS of 95% of the permanent Florida Inventory of School Houses (FISH) capacity for elementary and middle schools, and 100% of permanent FISH capacity for high schools.

Concurrency Service Areas (CSAs)

Florida Statutes:

- a. Allow for the adoption of a districtwide CSA
- b. Require less than districtwide CSAs be established within 5 years of adoption of school concurrency

School District's proposal:

The School District has proposed the adoption of less than districtwide CSAs; 15 elementary, 8 middle, and 8 high school CSAs.

Proportionate Share Mitigation

Florida Statutes:

- a. Require the developer to execute a legally binding development agreement with the local government and the school district
- b. Require that the mitigation be proportionate to the demand from the development
- c. Allow various mitigation options, such as, but not limited to, the payment for construction or land acquisition, contribution of land, and actual facility construction
- d. Require that the developer mitigation be directed by the School Board to a school capacity improvement identified in the District's five-year work plan that satisfies the impacts created by the residential development
- e. Require the mitigation amount be credited toward impact fees

Availability Standard

Florida Statutes:

- a. Require school concurrency be applied to residential projects only
- b. Require concurrency be applied at time of site plan, final plat approval, or functional equivalent, for a development or a phase of development
- c. Require capacity be in place or under construction within the first three years of the District's CIP

d. A developer may satisfy school concurrency by mitigating impacts proportionate to demand

- Public School Facilities Element (PSFE) – Local governments are required to adopt Public School Facilities Elements that are consistent with each other and comply with Section 163.3177 (12), F.S., and Rule 9J-5.025, F.A.C. The PSFE shall ensure that the public school concurrency program is based on relevant data and analysis and that consistent goals, objectives and policies are adopted. The PSFE must also ensure adequate school capacity for the five-year and long term planning periods; address the correction of existing deficiencies; address procedures for school siting; coordinate school siting with residential development; and ensure provision of necessary supporting infrastructure.
- Capital Improvement Element (CIE) - Local governments are required to adopt amendments to their CIEs that are consistent with Section 163.3177, F.S., and Rule 9J-5.016, FAC. Local governments are required to incorporate the District's financially feasible public school capital facilities program and LOSS into their CIEs.
- Intergovernmental Coordination Element (ICE) – Local governments are required to adopt amendments to their ICEs that are consistent with the requirements of Section 163.3177 (6) (h) 1-2, F.S. The Element must provide for the coordination of plans with the School District, and include joint processes for school siting and population projections.

FISCAL IMPACT:

The only fiscal impact to Collier County at this time are the costs associated with document processing, review and advertisement, since final action is not being taken by the Board at this hearing. If approved for Transmittal, these documents will subsequently be considered for adoption at hearings to be held in 2008. Thereafter, land development regulations will be required for the School Concurrency Program implementation.

GROWTH MANAGEMENT IMPACT:

Approval and transmittal of these documents by the Board of County Commissioners to the Florida Department of Community Affairs will commence the Department's sixty (60) day review process. This will be followed by the Department's Objection, Recommendations and Comments Report, then final Adoption hearings by the Planning Commission and the Board of County Commissioners, to be held in 2008.

LEGAL CONSIDERATIONS:

This Executive Summary has been reviewed by the County Attorney's office.

The Florida Legislature mandated that every County within Florida, with some exceptions, adopt school concurrency management programs pursuant to Florida Statutes. The required amendments to the Growth Management Plan, Interlocal Agreement, and new Public School Facilities Element and support document, are authorized by, and subject to the provisions established within, Chapters 163 and 1013, Florida Statutes.

However, the legal staffs of the School District and County have differing interpretations on various provisions contained within Chapters 163 and 1013, F.S., dealing with the question of whether or not the District must adhere to the County's land development regulations and Comprehensive Plan for site plan review, and the need to identify whether the County or the School Board will be required to provide transportation and infrastructure improvements to support schools identified for construction in the School District's Capital Improvement Plan on road segments not within the County's 5-year Capital Improvement Element. Senior management from the School District and County have reached consensus on how to address these issues, as outlined below.

RECOMMENDATION:

The Resolution Exhibits reflect the *Collier County Planning Commission's* recommendations, and subsequent staff changes made to the CIE for internal consistency. The School District and County staffs' recommendations are the same as the CCPC, except as set forth below and possibly staff's subsequent CIE changes. In addition to the Resolution Exhibits and the recommendations below, staff has *attached* to the Executive Summary a complete list of the CCPC's recommendations for each document, including the "action" taken by staff on each item and staff's subsequent changes to the CIE.

A. Document: Interlocal Agreement (ILA)

(1) ILA Section 12.3 b.

Issue Explanation: Due to differing interpretations of certain statutory provisions contained within Chapters 163 and 1013, F.S., upper management from the School District and County agreed to defer discussions on the School Board Review (SBR) ILA until a later date, and agreed to the underlined text identified under the County staff recommendation below, for incorporation into the School Concurrency ILA. However, the CCPC in its review of the ILA, and in consultation with the County Attorney's Office, recommended alternative text requiring that, in the absence of an SBR ILA Agreement, the School District shall be subject to the County's Comprehensive Plan and Land Development Code.

County Staff Recommendation

Expiration of the SBR Interlocal Agreement Between the County and the School District.

"The County and the School District agree that prior to the expiration of the SBR Interlocal Agreement, they will negotiate in good faith and use their best efforts to develop another SBR Interlocal Agreement, to be entered into pursuant to Section 1013.33 (14), F.S. Alternatively, if (i) the County and the School District are unable to agree on another SBR Interlocal Agreement, (ii) the SBR Interlocal Agreement expires, and (iii) the County and the School District disagree over the review of a school site plan, then the County and the School District hereby agree that the School District shall file an action in the Circuit Court of Collier County seeking a declaratory judgment to resolve the dispute."

School District's Recommendation

The School District's recommendation is the same as County staff's recommendation above.

CCPC Recommendation

At the November 1, 2007 CCPC meeting, the definition of the term “development” was referenced by the County Attorney’s Office where it was stated that the law *does not exempt* schools from the definition of that term, pursuant to Section 380.04, F.S.

The CCPC, in reliance of the Assistant County Attorney’s interpretation of the above statutory provision, recommended the underlined text below for inclusion into the ILA.

Expiration of the SBR Interlocal Agreement Between the County and the School District.

“The County and the School District agree that prior to the expiration of the SBR Interlocal Agreement, they will negotiate in good faith and use their best efforts to develop another SBR Interlocal Agreement, to be entered into pursuant to Section 1013.33 (14), F.S. In the absence of an SBR Interlocal Agreement, the School District shall be subject to the County’s Comprehensive Plan and Land Development Code, as amended, for site development plan review, subject to the exceptions of the Florida Statutes.”

(2) ILA Section 13.8 (a)

Issue Explanation: Section 163.3180 (13)(d) 1., F.S., requires local governments to amend their CIEs to include provisions which set forth a financially feasible public school capital facilities plan that demonstrates the adopted LOSS will be achieved and maintained.

The School District staff has provided a public school capital facilities plan to County staff, which appears to demonstrate that the proposed LOSS will be achieved and maintained as required by F.S. However, the School District’s CIP, as proposed, includes the opening of Combo School EEE in year 2012 – within the County’s Five-Year planning period. The needed improvements for School EEE are not presently scheduled in the County’s Five-Year CIE.

Senior management from the School District and County, in consultation with their legal staffs, agreed to the text identified under the County staff recommendation below, for incorporation into the School Concurrency ILA. However, the CCPC recommended adding text to this section of the ILA to preclude the School District from obligating the County to construct public facilities to accommodate schools where infrastructure is not readily available or planned within the County’s five-year capital plan.

County Staff Recommendation

County staff recommends adopting the District’s Five-Year Capital Improvement Plan into the Capital Improvement Element by reference, pursuant to the agreement between the senior management of the County and School District, and as set forth in the ILA provision below. However, staff should acknowledge to the Department of Community Affairs that the incorporation of the District’s CIP into the County’s CIE may cause the County’s Comprehensive Plan to be internally inconsistent.

Adoption and Amendment of the Capital Improvement Element (CIE)

“An annual update or any amendment to the School District’s Five-Year Capital Improvement Plan

shall be transmitted to the Local Government for review and comment no less than 60 days prior to adoption by the School Board. The County and Cities shall adopt by reference the School District's annually updated financially feasible Capital Improvement Plan, specifically the "Summary of Capital Improvement Program" and the "Summary of Estimated Revenue" Tables from the School District's Five-Year Capital Improvement Plan into the Capital Improvement Element of their Comprehensive Plans. The annual update to the "Summary of Capital Improvements Program" and "Summary of Estimated Revenue" Tables from the School District's annually adopted financially feasible Five-year Capital Improvement Plan shall be adopted by reference each year by the Local Governments...."

School District's Recommendation

The School District recommends the County adopt the District's Five-Year Capital Improvement Plan into its CIE by reference.

CCPC Recommendation

The CCPC recommended adopting the District's Capital Improvement Plan into the County's Capital Improvement Element by reference, provided additional text was added to the ILA provision to ensure that the CIE remains financial feasibility, as provided below.

Adoption and Amendment of the Capital Improvement Element (CIE)

"An annual update or any amendment to the School District's Five-Year Capital Improvement Plan shall be transmitted to the Local Government for review and comment no less than 60 days prior to adoption by the School Board. The County and Cities shall adopt by reference the School District's annually updated financially feasible Capital Improvement Plan, specifically the "Summary of Capital Improvement Program" and the "Summary of Estimated Revenue" Tables from the School District's Five-Year Capital Improvement Plan into the Capital Improvement Element of their Comprehensive Plans. The annual update to the "Summary of Capital Improvements Program" and "Summary of Estimated Revenue" Tables from the School District's annually adopted financially feasible Five-year Capital Improvement Plan shall be adopted by reference each year by the Local Governments, provided such adoption does not affect the Local Governments' ability to maintain a financially feasible CIE for the current five-year planning period...."

B. Document: Capital Improvement Element (CIE)

(1) School District's Five-Year Capital Plan – adopted by reference.

Issue Explanation: The School District's Capital Improvement Plan contains two schools –“EEE” and “O”- which are scheduled to open in year 2012. The two schools would require infrastructure improvements that are not scheduled in the County's CIE. The adoption of the District's CIP, with the referenced schools, may cause the County's Growth Management Plan to be internally inconsistent. To resolve any potential inconsistency with the Comprehensive Plan, the District could remove schools “EEE” and “O” from its CIP or recognize that the District is responsible for any and all improvements and in doing so enter into an interlocal agreement/developer contribution agreement with the County to pay for the infrastructure improvements needed to accommodate the proposed schools.

County Staff Recommendation

Pursuant to the agreement between the senior management of the County and School District, staff recommends adopting the District's Capital Improvement Plan into the County's CIE by reference, acknowledging to the Department of Community Affairs that the County's Comprehensive Plan may be internally inconsistent.

School District's Recommendation

District staff recommends removing School “O” from, and retaining School “EEE” in, its CIP.

The School Board approved the removal of School “O” from the District Work Plan at their November 15, 2007 meeting.

CCPC Recommendation

At the CCPC hearing, the District staff informed the Planning Commission that School “EEE” would remain in the District's CIP and School “O” would be removed. District staff emphasized that **construction** dollars for School “EEE” are allocated in year 2009/2010 of their CIP (County's 3rd year) and the school's opening would not occur until the District's 6th year - 2012 (County's 5th year).

The CCPC recommended not accepting Schools “EEE” and “O” as part of the CIE amendments, unless the School District and County resolved any outstanding issues related to the CIE's financial feasibility.

C. Document: Public School Facilities Element (PSFE)

(1) Figure: Future Schools and Ancillary Facilities Map

County Staff Recommendation

Pursuant to the agreement reached by senior management from the School District and County, staff recommends acknowledging to the Department of Community Affairs that

the opening of School “EEE” in 2012 may cause the Comprehensive Plan to be internally inconsistent.

School District’s Recommendation

Retain the reference to the opening of School “EEE” on the map.

CCPC Recommendation

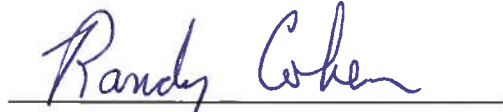
The CCPC recommended, removing the reference to the opening date of 2012 for School “EEE” from the map, unless a resolution is reached regarding issues related to the CIE’s financial feasibility.

PREPARED BY:



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DATE: 11-20-07

REVIEWED BY:


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DATE: 11-20-07


MARJORIE M. STUDENT-STIRLING
ASSITANT COUNTY ATTORNEY
OFFICE OF THE COLLIER COUNTY ATTORNEY

DATE: 11/20/07

APPROVED BY:


JOSEPH K. SCHMITT, ADMINISTRATOR
COMMUNITY DEVELOPMENT AND
ENVIRONMENTAL SERVICES DIVISION

DATE: 11/20/07

PETITION NO: CPSP-2007-7
EXECUTIVE SUMMARY for the December 4, 2007 BCC Meeting

mm/11-16-07

Collier County Planning Commission Recommendations

Interlocal Agreement for Public School Facility Planning and School Concurrency

Vote: 5-0

The CCPC recommended transmittal of the ILA with the following changes.

- Add a list of acronyms to the document. **[Reflected in Exhibit, behind Table of Contents]**
- 4th Whereas Clause – Add the word, “potential” before the word deficit. **[Reflected in Exhibit]**
- Definition Section – Under definition of Applicant, capitalize “residential development.” **[Reflected in Exhibit]**
- Section 3.1 – Insert sentence, “An agenda will be provided by School District staff one week in advance of all scheduled meetings.” **[Reflected in Exhibit]**
- Section 5.2 (c) – Revise text to read, “The number of building permits issued for new residential units, the number of units authorized, and the location of such residential units;” **[Reflected in Exhibit]**
- Section 6.1 – Correct the spelling of “capacity.” **[Reflected in Exhibit]**
- Section 6.2 (a) – add (b) after “10.1” **[Reflected in Exhibit]**
- Section 7.1 – Add the phrase, “and off-site” after the word on-site. **[Reflected in Exhibit]**
- Section 8.2 – Delete the word, “affect” and insert, “increase or decrease.” **[Reflected in Exhibit]**
- Section 11.4 – Before the word conducted, add the phrase, “open and accessible to the public, and,” and end the sentence after the word “law.” **[Reflected in Exhibit]**
- Section 12.3 b. – *Delete*, “Alternatively, if (i) the County and the School District are unable to agree on another SBR Interlocal Agreement, (ii) the SBR Interlocal Agreement expires, and (iii) the County and the School District disagree over the review of a school site plan, then the County and the School District hereby agree that the School District shall file an action in the Circuit Court of Collier County seeking a declaratory judgment to resolve the dispute” and *add*, “In the absence of an SBR Interlocal Agreement, the School District shall be subject to the County’s Comprehensive Plan and Land Development Code, as amended, for site development plan review, subject to the exceptions of the Florida Statutes.” **[Reflected in Exhibit]**

- Beginning in Section 13 and throughout the remainder of the document – Replace all references to “LOS standard” with “LOSS.” **[Reflected in Exhibit]**
- Section 13.1 (a), 3rd sentence - Delete “of” and replace with “or”. **[Reflected in Exhibit]**
- Section 13.3 (a) – Replace the word “zoned” with “zones.” **[Reflected in Exhibit]**
- Section 13.3 (b) 1. – Add text to clarify how the CSA boundaries are created. (ILA provision reads, “using the merger of Traffic Analysis Zones (TAZs) and school attendance boundaries.) **[Reflected in Exhibit]**
- Section 13.4 (j) – Delete the word, “Oversight” to make consistent with Section 11. **[Reflected in Exhibit]**
- Section 13.5 (c) – Remove text, “thirty (30) days” and replace with, “two weeks.” **[Reflected in Exhibit]**
- Section 13.5 (e) – Remove the word, “majority”. **[Reflected in Exhibit]**
- Section 13.6, last sentence – Remove all text after “Local Governments” and insert, “thirty days prior to School Board review” and add a new last sentence, “Local Governments shall provide comments, if any, on the Tentative Educational Facilities Plan to School District staff two weeks prior to School Board review.” **[Reflected in Exhibit]**
- Section 13.7 (b) - Add “gap” language to enforce the provisions of the school concurrency program. **[Reflected in Exhibit. Staff also included the same text in the PSFE under Policy 1.2.3]**
- Section 13.8 (a), 3rd sentence – Add “provided such adoption does not affect the Local Governments’ ability to maintain a financially feasible CIE for the current five-year period.” **[Reflected in Exhibit]**
- Section 13.8 (b) – Revise text to read, “The County and the Cities shall adopt Public School Facilities Elements which are consistent with each other.” **[Reflected in Exhibit]**
- Section 14.1 (c) – Revise list of exemptions to make consistent with the list of exemptions found in the Public School Facilities Element. **[Reflected in Exhibit]**
- Section 14.1 (c) 6. – The County Attorney’s Office was asked to confer with the Department of Community Affairs to determine whether to insert an effective date of “July 2005” to reflect SB 360 text, as requested by District staff/consultant or insert an effective date of “March 1, 2008,” as suggested by the Assistant County Attorney.

[Assistant County Attorney’s text reflected in Exhibit. A response from the DCA is expected on this issue prior to transmittal or through the amendment review process.]

- 14.2 (a) 2. – Revise text to read, “Within 20 days of receipt of a sufficient SIA application, the school district representative shall review the application and provide written comments to the Local Government. Each SIA application shall be reviewed in the order in which it is received.” **[Reflected in Exhibit]**
- Section 14.4, last sentence – Revise sentence to read, “This DRT shall be available for public viewing at the School District.” **[Reflected in Exhibit]**
- Section 14.5 (c) 5. – Delete the word, “Improvements” and insert the word, “Mitigation.” **[Reflected in Exhibit]**
- Appendix D – Revise timelines as agreed to by the staffs of the District and County. **[Reflected in Exhibit]**

Collier County Planning Commission Recommendations

Public School Facilities Element (PSFE)

Vote: 5-0

The CCPC recommended transmittal of the PSFE with the following changes.

- Determine consistency between the LOSS contained in the School Impact Fee Study (100% sq. ft per student station for each school type) and the LOSS identified in the ILA, PSFE and CIE (95% FISH capacity for elementary and middle and 100% FISH capacity for high schools) prior to adoption of the LOSS for school concurrency by the BCC. [The Comprehensive Planning Director discussed the methodology used in the School Impact Fee Study with the County's Impact Fee Manager. The Impact Fee Manager indicated that student enrollment figures and other variables were used to determine impact fees, not FISH capacity. The LOSS used to calculate Impact fees doesn't directly correlate with the LOSS calculation for school capacity - no consistency issue exists at this time. Further, the Impact Fee Manager explained that staff would discuss the LOSS methodology with the County's Impact Fee consultant next year when the School Impact Fee Study is updated. **No action taken by staff at this time.**]
- Policy 1.2.2 – Review list of exemptions in the PSFE to ensure consistency with those exemptions listed in the ILA. **[Reflected in Exhibit]**
- Policy 1.2.2 A. & B. – Add effective date of “March 1, 2008” **[Reflected in Exhibit]**
- Policy 1.2.2 F. – The County Attorney's Office was asked to confer with the Department of Community Affairs to determine whether to insert an effective date of “July 2005” to reflect SB 360 text, as requested by District staff/consultant or insert an effective date of “March 1, 2008,” as suggested by the Assistant County Attorney. **[Assistant County Attorney's text reflected in Exhibit. A response from the DCA is expected on this issue prior to transmittal or through the amendment review process.]**
- Policy 1.2.2 F. – Add text to provide exemption for projects approved as a DRI that have school commitments, but that subsequently abandoned their DRI status. **[Reflected in Exhibit]**
- Policy 1.2.5 – Delete Policy if not required by statute. **[Policy deleted]**
- Policy 1.2.6 (renumbered - formerly Policy 1.2.5) – Delete reference to “180 days” and insert “one year.” **[Reflected in Exhibit]**
- Objective 1.3 – Delete “Beginning in” and insert “By December.” **[Reflected in Exhibit]**

- Policy 1.3.3 – Delete the word, “ensure” and insert “determine.” **[Reflected in Exhibit]**
- Policy 1.3.5 – Revise Policy to reflect text contained in 9J-5.025 (3)(c) 11., F.A.C. **[Reflected in Exhibit]**
- Future Schools and Ancillary Facilities Map – Remove reference to the opening date of 2012 for Combo School EEE, unless the School District and the County resolve any issue relating to the financial feasibility of the CIE. **[Map has not yet been revised by the School District to reflect the CCPC’s recommendation.]**

Collier County Planning Commission Recommendations

Public School Facilities Element – Data and Analysis Report

- The CCPC did not make a recommendation on the Data and Analysis Report.
- The School District staff provided County staff with revised School Concurrency tables, reflecting school capacity within the District’s 5-year planning period subsequent to the CCPC hearing. **[Revised tables included in the Data and Analysis Exhibit]**
- The School District staff provided County staff with revised “Summary of Capital Improvement Program” tables, reflecting revisions to capital expenditure figures and the removal of school “O” from the District’s Five-Year CIP, prior to the CCPC hearing. **[Revised tables included in the Data and Analysis Exhibit]**

Collier County Planning Commission Recommendations

Capital Improvement Element (CIE)

Vote: 5-0

The CCPC recommended transmittal of the CIE with the following changes.

- Policy 1.1.5 A8. 1-3 – Revise to read, “CSA/Permanent FISH Capacity” [**Reflected in Exhibit**]
- Policy 1.2.4 – Review Policy to determine whether or not reference to “public schools” is needed. Determine how removal/retention of reference affects other Policies within that same section of the CIE. [**Reference removed and other Policies revised to make Element internally consistent**]
- Programs to Ensure Implementation, 6. B. – Delete the phrase, “at the end of” and insert, “within.” [**Reflected in Exhibit**]
- School District’s “Summary of Capital Improvement Program” – The CCPC recommended not accepting Schools “EEE” and “O” as part of the CIE amendments, unless the School District and County were able to resolve any outstanding issues related to the financial feasibility of the CIE. Also, the CCPC requested that staff note to the DCA that the County and School District have reached an impasse on this issue, if unresolved prior to transmittal. [**Staff will discuss this issue with the BCC on December 4, 2007 and then take action as directed.**]

Staff changes to the CIE subsequent to the CCPC Hearing

- Objective 1.1 – Revised Objective to make corresponding policies consistent.
- Policy 1.1.2 C. – Deleted “or as generating a number of new public school students in excess of the adopted LOS standard for each Concurrency Service Area (CSA) for each school type.” [**Reference not applicable – methodologies differ**]
- Objective 1.2 – Revised Objective to make corresponding policies consistent.
- Policy 1.2.4 – Deleted reference to public schools. [**Reference not applicable**]
- Policy 1.4.2 - Deleted reference to the adoption of the School District’s CIP in Policy 1.4.1 and created new Policy 1.4.2. to include reference. [**Reference not applicable under Policy 1.4.1**]
- Programs to Ensure Implementation, 6. – Revised to make corresponding provisions consistent.

Collier County Planning Commission Recommendations

Intergovernmental Coordination Element (ICE)

Vote: 6-0

- The CCPC recommended transmittal of the ICE without any changes.