

## SUMMARY OF AGENCY COMMENTS AND STAFF RESPONSES

The proposed EAR-based amendments to the comprehensive plan were submitted to the Florida Department of Commerce (FDC) and other required reviewing agencies on February 12, 2024. Although the Town received comments from several agencies, there were no objections to the proposed amendments. The following agencies submitted comments: FDC; Treasure Coast Regional Planning Council (TCRPC); South Florida Water Management District (SFWMD); Florida Department of Transportation (FDOT) District 4; and the Palm Beach County School District.

The second public hearing to consider adoption of the amendments must be held within 180 days of the Town's receipt of the FDC Objections, Recommendations and Comments (ORC) report dated April 12, 2024.

The Town Council will convene a workshop to discuss the comments received from the reviewing agencies and the need for further amendments to the comprehensive plan prior to consideration of second reading.

### Florida Department of Commerce (Florida Commerce)

A. **Objections:** None.

B. **Comments:** The following two comments were offered: with Staff responses:

1. **Planning Horizons:** Florida Commerce staff encourages the Town to amend the comprehensive plan to reflect the new statutorily required planning periods pursuant to Florida Statutes Sections 163.3177(5)(a) and 163.3191. The planning periods include the first 10-year period after the plan's adoption and an additional period of at least 20-years.

Staff Response: The 2024 Evaluation and Appraisal Report Support Documentation (Support Documentation Section III.A)) and the 2024 Evaluation and Appraisal Report Goals Objectives and Policies (Goals, Objectives and Policies Population Introduction Element Population Projections Section) documents both contain population projections to 2035 and 2045. These projections are used as they are prepared by the Palm Beach County Planning Division and used by the county and various planning agencies. Since they are used as the basis for planning coordination in Palm Beach County and meet the 10 and 20-year planning periods, they will continue to be incorporated within Town planning documents.

2. **Coordinate with External State Agencies:** Florida Commerce strongly encourages the Town to work with staffs from Florida Department of Transportation, South Florida Water Management District, and Treasure Coast Regional Planning Council to address the comments that were provided in their correspondence.

Staff Response: Comments by each of these agencies are summarized in the paragraphs that follow as well as Town responses. It should be stated that there were no objections submitted by any of these agencies.

## Treasure Coast Regional Planning Council (TCRPC)

A. **Objections:** None.

B. **Comments:** The following official TCRPC comments were offered:

1. **Regional Impacts:** No adverse effects on regional resources or facilities have jurisdictions by the Palm Beach County Intergovernmental Plan Review Committee Clearinghouse Coordinator.

Staff Response: No response necessary

C. **Additional Suggestions:** The following additional TCRPC suggestions were offered: along with Staff responses:

1. **Public School Facilities:** Since the Public Schools Facilities Element is to be eliminated, at a minimum, the language in Objective 7.3 and associated Policies in the Intergovernmental Coordination Element should be retained to state that the Town will work with the School District on population projections and school siting in accord with Section 163.3177(6)(h)(2) of the Florida Statutes. In addition, the Town is encouraged to join as a signatory to the Coordinated School Planning Interlocal Agreement

Staff Response: Staff recommends that Objective 7.3 of the Intergovernmental Coordination Element, rather than being deleted, be revised to establish consistency with Section 163.3177(6)(h)(2) of the Florida Statutes which requires coordinating the Town's comprehensive Plan with plans of the school district, as well as other listed agencies.

Staff recommends that Intergovernmental Coordination Element Objective 7.3 be retained in its original form, and Policy 7.3.1, in its original form, be revised, as follows and incorporated within the Comprehensive Plan:

### 7.3 Objective:

*Ensure coordination with the School Board of Palm Beach County to establish concurrency requirements for public school facilities.*

#### 7.3.1 Policy:

~~The Town of Loxahatchee Groves, in cooperation with appropriate local, county, and state governments and agencies, shall continue to utilize the following collaborative planning process will work with the School District on population projections and school siting in accord with Section 163.3177(6)(h)(2) of the Florida Statutes.~~

2. **Infrastructure Element:** Consider not deleting the stormwater management criteria in Policy 3.1.2 since these establish a Level-of-Service standard for this important aspect of the Town's infrastructure and help manage the impact of new development.

Staff Response: Infrastructure Element Drainage Policies 3.1.2 a to i are proposed to be deleted, as the criteria are currently within the Town's Unified Land Development Code (ULDC) and used to guide the Town's infrastructure development and maintenance. Including the criteria in the



ULDC is the most efficient way to administer and revise, if necessary, the specifics of the Policy 3.1.2 directive. Staff recommends no change to the proposed revision.

**3. Intergovernmental Coordination Element:** In policy 7.1.4, the reference to Council should be revised as follows in strikethrough and underline:

~~The Town's Comprehensive Plan~~ Town will consider be consistent, where feasible and practical, with the Treasure Coast Regional Policy Planning Council Regional Strategic Regional Policy Plan, Palm Beach County Comprehensive Plan, the Comprehensive Plans of adjacent local governments, and applicable regional water supply plans when amending the Comprehensive Plan.

**Staff Response:** Staff recommends that the proposed TCRPC revision to Intergovernmental Coordination Element Policy 7.1.4 be incorporated within the adopted Comprehensive Plan.

## **South Florida Water Management District (SFWMD)**

**A. Objections:** None.

**B. Comments:** The following two "Advisory Comments" comments were offered: along with Staff responses:

### **1. Infrastructure Element – Natural Groundwater Aquifer Recharge:**

Policy 3.2.1 states: "The town shall enforce the landscape regulations which shall address the SFWMD's xeriscape guidelines." The term "Xeriscape" is dated language that has been replaced by Florida-Friendly Landscaping. The District recommends that the Town update this language to reflect the current Florida Statutes. There are resources available if the Town would like to consider adopting a local Florida-Friendly Landscaping ordinance (Chapter 373.185 Florida Statutes).

**Staff Response:** Staff recommends that Natural Groundwater Aquifer Recharge Policy 3.2.1 be revised to read:

**Policy 3.2.1:**

~~The Town shall enforce landscape regulations which shall address the SFWMD's xeriscape guidelines~~ require quality landscapes that conserve water, protect the environment, are adaptable to local conditions, and are drought tolerant.

**2. Regional Water Supply Planning:** The Town is required to revise its Water Supply Facilities Plan (Work Plan) within 18 months after approval of the Lower East Coast (LEC) Water Supply Plan Update by the District's Governing Board. The District's Governing Board approved the LEC Water Supply Plan Update on November 8, 2018. Therefore, the Town's Work Plan needed to be updated and adopted by May 2020. To date, we have not received the updated Work Plan. The Work Plan must cover at least a 10-year planning period, include updated water

demand projections, identify alternative and traditional water supply projects, and describe conservation and reuse activities needed to meet the projected future demands.

Staff Response: The Town's Ten-Year Water Supply Facilities Work Plan Update is presented in Section II.A.1 of the 2024 Evaluation and Appraisal Report Support Documentation. The Update was prepared pursuant to the document entitled: "A Guide to the Preparation of the Water Supply Facilities Work Plan" and is consistent with the most recent Palm Beach County Water Supply Plan Update. The Lower East Coast Water Supply Facilities Work Plan is currently being updated. The Town will coordinate with Palm Beach County in the preparation of its next Update consistent with Infrastructure Element Potable Water Policy 3.4.1 and update the Town's Ten-Year Water Supply Facilities Work Plan, as necessary.

#### **Florida Department of Transportation (FDOT) District 4**

**A. Objections:** None.

**B. Comments:** Three Technical Assistance Comments were offered: by FDOT District 4. Due to their length, a complete copy of the Technical Assistance Comments and Recommendations are presented in Attachment A. The following is a summary of the comments and recommendations along with Staff responses:

**1. Transportation Element Policies 2.2.5 and 2.2.6:** The Town is proposing to constrain Okeechobee Boulevard to two lanes and encourage traffic calming features to be incorporated as part of future transportation projects. For instance Policy 2.2.5(2) which reads: "(2) annual exclusion of that portion of Okeechobee Boulevard from Folsom Road to west of A Road from consideration of expansion to four lanes from the County's 5-Year Road Program."

The Town should reconsider the adoption of policies (2.2.5 and 2.2.6) that will constrain the future number of lanes on Okeechobee Boulevard. Alternatively, the Town should allow for needed capacity improvements to occur but at a speed consistent with the Town's rural character and controlled through appropriate roadway design elements.

Staff Response: All Town-related planning documents, commencing with the Loxahatchee Groves Neighborhood Plan (1996), and including the Strategic Vision Plan (2008) and initial Comprehensive Plan (2011) have stressed maintenance of the existing quality of life and preservation of the natural environment and rural atmosphere. Further, the Florida Department of Commerce (FDC) has recently (2023) determined that the Town is a "rural community" as the term is defined by Section 288.0656(2)(a)4, Florida Statutes.

The local consistent historical planning directives and FDC determination support maintaining Transportation Element Policies 2.2.5 and 2.2.6 in their current proposed form. Staff proposes no revision to Transportation Element Policies 2.2.5 and 2.2.6.

**2. Future Land Use Element 1.2 and Related Policies:** The Town is proposing a revised Objective 1.2 and related policies 1.2.1 and 1.2.3 that will direct rural style commercial center development consisting of accessible shopping, recreation and employment opportunities for Town residents and substantial equestrian land uses away from Okeechobee Boulevard and specifically target all this activity within the Town along the Southern Boulevard/State Road 80 Corridor.



Implementation of this objective and policies has the potential to create adverse impacts to SR 80, a Strategic Intermodal System (SIS) facility. The Department projects that SR 80 will not have sufficient capacity in the future to serve the demand created by existing and future development. The proposed objective and policies may result in a diversion of local trips within the Town to the SR 80 Corridor to satisfy local home-based shopping trips.

The Town should consider the implementation of strategies to offset the impacts of local trips on SR 80. For example, the Town could update the comprehensive plan to identify additional roadway connections between A Road and F Road and between Okeechobee Boulevard and SR 80 on Map TRN 2. Additionally, language regarding Tangerine Drive in Policy 1.2.4 could be strengthened relating to the roadway's function as a parallel reliever to SR 80 local trips.

Staff Response: The vast majority of development potential along Southern Boulevard (Palm Beach Community College, Loxahatchee Groves Commons, Groves Town Center, Lockhart Self-Storage, AG Market, Palms West Plaza, Southern Lawn Care, Groves Medical Office and Everglades Farm Equipment) have already been built or approved. Remaining development opportunities with the potential to generate additional traffic impacts on Southern Boulevard capacity are minimal. Implementation of Policy 1.2.4, as written, would complete the Tangerine Drive/East Citrus east-west link between the Community College and Town Hall located on F Road as proposed by FDOT. Staff proposes no revision to Future Land Use Element 1.2 and related Policies.

**3. Transportation Element Policies:** The Transportation Element includes a policy (2.2.6A) to designate Okeechobee Boulevard as a Rural Minor Collector in the Town's Comprehensive Plan. This designation is inconsistent with the Federal Functional Classification assigned to Okeechobee Boulevard as an Urban Collector. Census designated urban boundaries, not the character of an area, form the basis for designating if a roadway segment is within a rural or urban area. The Town is located within the Miami-Fort Lauderdale Urban Area. Only roadways functionally classified as urban minor collector or above are eligible for Federal Surface Transportation Funds. Future funding for roadway infrastructure that the Town may rely on in the future could be jeopardized by the inconsistency.

It is recommended that the Town consider amending Policy 2.2.6.a and applicable Transportation Element Functional Classification Maps to display the correct and official Federal Functional Classification of Okeechobee Boulevard in the Town's Comprehensive Plan.

Staff Response: The Town's proposed assignment of a "Rural Minor Collector" Functional Classification designation to Okeechobee Boulevard is consistent with all current and previous local planning efforts, as well as the recent Florida Department of Commerce (FDC) determination that the Town is a "rural community". In further support of this conclusion, Erdman Anthony prepared an Urban Area Study (2011) which concluded that only 11% of the area of the Loxahatchee Groves Water Control district met the criteria for designation as an Urban Area under Florida Statutes 189.4051. Staff concludes that the proposed "Rural Minor Collector" Functional Classification of Okeechobee Boulevard is appropriate and recommends that no revisions to proposed Policy 2.2.6a and Map TRN-1 be made. Alternatively, in order to support eligibility for

federal funding, the Town may revise Map TRN-1 to classify Okeechobee Boulevard as an "Urban Minor Collector."

#### **Palm Beach County School District (PBCSD)**

**A. Objections:** None.

**B. Comments:** No official comments were offered.

Staff Response: An email was received from PBCSD with attachments related to the Countywide School Planning Coordination Interlocal Agreement. The Florida Legislature passed growth management legislation that made school concurrency optional in 2011. However, local governments are still required to enter participate in an Interlocal Agreement that describes a joint process for collaborative planning and decision making on population projections and school siting.

A Coordinated Planning Interlocal Agreement (ILA) was approved by the School Board and Palm Beach County Commission in 2015. The Coordinated Planning ILA adopts a School Capacity Adequacy Determination (SCAD) for the planning and construction of public schools. In Palm Beach County

The PBCSD has suggested that the Town include a policy in the Intergovernmental Coordination Element that supports the maintenance and enhancement of joint planning processes and procedures for coordination of public education facilities for planning and decision-making, including participation in the Countywide School Planning Coordinated Interlocal Agreement (ILA). Staff recommends including Policy 7.3.2 in the Intergovernmental Coordination Element that supports joint planning processes through the ILA, as follows:

##### 7.3.2 Policy:

The Town shall abide by, and participate in, the "Interlocal Agreement between the School Board of Palm Beach County and Municipalities of Palm Beach County for Coordinated Planning", adopted by the Palm Beach County Board of County Commissioners through Resolution 2015-1864.



## ATTACHMENT A – FDOT DISTRICT IV COMMENTS

**From:** Valdez, Yazmin  
**To:** Williams, Jana  
**Subject:** FW: [EXTERNAL] - Town of Loxahatchee Groves 24-1ER - FDOT District Four Review  
**Date:** Monday, March 18, 2024 11:29:30 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

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Loxahatchee Grives TA comments from DOT.

Yazmin

**From:** Hymowitz, Larry <Larry.Hymowitz@dot.state.fl.us>  
**Sent:** Thursday, March 14, 2024 9:00 AM  
**To:** DCPexternalagencycomments <dcpexter@commerce.fl.gov>; Valdez, Yazmin <Yazmin.Valdez@Commerce.fl.gov>  
**Cc:** framaglia@loxahatcheegrovesfl.gov; Krane, John <John.Krane@dot.state.fl.us>; Martinez, Cesar <Cesar.Martinez@dot.state.fl.us>; McKirdy, Kris <Kris.McKirdy@dot.state.fl.us>; Walia, Kent <Kent.Walia@dot.state.fl.us>; Bush, Lois <Lois.Bush@dot.state.fl.us>; Harari, Laurie <Laurie.Harari@dot.state.fl.us>; Kareiva, Ronald <Ronald.Kareiva@dot.state.fl.us>; Shanmugam, Raj <Raj.Shanmugam@dot.state.fl.us>; Carver, Jennifer <Jennifer.Carver@dot.state.fl.us>; Norat, Tony <Tony.Norat@dot.state.fl.us>; Sosa, Geysa <Geysa.Sosa@dot.state.fl.us>; Campbell, Tammy <Tammy.Campbell@dot.state.fl.us>; Brian Ruscher <bruscher@palmbeachtpa.org>; Andrew Uhlir <auhlir@palmbeachtpa.org>; Jeff Gagnon <JGagnon@pbcgov.org>; KMOHYUDD@pbcgov.org; Motasem Al-Turk <MAlturk@pbcgov.org>; Stephanie Heidt <sheidt@tcrpc.org>; Bradford O'Brien <BObrien@royalpalmbeach.com>  
**Subject:** [EXTERNAL] - Town of Loxahatchee Groves 24-1ER - FDOT District Four Review

Pursuant to Section 163.3184(4), Florida Statutes, (F.S.) in its role as a reviewing agency as identified in Section 163.3184(1)(c), F.S., the Florida Department of Transportation (FDOT) reviewed the Town of Loxahatchee Groves' EAR based Comprehensive Plan Amendments, which are transmitted under the State Coordinated Review (SCR) process. These amendments include the following components:

1. Addition of New Elements: Incorporates Introduction and Private Property Rights Elements within the Goals Objectives and Policies of the Comprehensive Plan.
2. Deletion of an Element: Deletes the Public-School Facilities Element Goals Objectives and Policies, as the Element is no longer required.
3. Revision of Elements: Incorporates revisions to the Goals Objectives and Policies of the following Elements: Future Land Use; Transportation; Infrastructure; Conservation; Recreation and Open Space; Housing; Intergovernmental Coordination; and Capital improvements; and
4. Element Map Updates: Incorporates revisions to, or additions of, Maps in the following Elements: Future Land Use (FLU-1); Transportation (TRN-1 and TRN-2); and Infrastructure (INF-1 and INF-2).

Based on a review of the City's amended Plan, FDOT is providing technical assistance comments consistent with Section 163.3168(3), Florida Statutes. The technical assistance comments will not form the basis of a challenge. These comments can strengthen the local government's comprehensive plan to foster a vibrant, healthy community and are designed to ensure consistency with the Community Planning Act in Chapter 163, Part II, F.S.

**Technical Assistance Comment #1 (Transportation Element Policies 2.2.5 and 2.2.6):**

The Town is proposing to constrain Okeechobee Boulevard to two lanes and encourage traffic calming features to be incorporated as part of future transportation projects. Policy 2.2.5(2) for instance.

**2.2.5 Policy:**

The following shall be Town policies: (1) permanent removal of the "E" Road, 140th Avenue extension; **(2) annual exclusion of that portion of Okeechobee Boulevard from Folsom Road to west of "A" Road from consideration of expansion to four lanes from the County's 5-Year Road Program;** (3) support for the extension of Seminole Pratt-Whitney Road north to State Road 710, the Beeline Highway; (4) opposition to the extension of Okeechobee Boulevard to State Road 80 (Southern Boulevard); and (5) support of the extension of State Road 7 from Okeechobee Boulevard to Northlake Boulevard.

This roadway is identified in the Palm Beach Transportation Planning Agency (TPA) 2045 Long Range Transportation Plan (LRTP) 2045 Volume to Capacity Map (Map 32) as exceeding a ratio of 1.2, indicating that the level of service (LOS) will exceed the adopted LOS D volume by 2045. Okeechobee Boulevard is an important regional facility, a designated truck route on Map 12 of the LRTP, and a vital connection between the Central Western Palm Beach County communities and downtown West Palm Beach. It is also important due to its connectivity with the Florida Turnpike and Interstate 95. The portion of the roadway from E Road to Crestwood Boulevard contains a 2022 Annual Average Daily Traffic (AADT) count of 14,600 vehicle trips, exceeding the 14,000 vehicles per day capacity of a rural two-lane roadway (Source: 2023 FDOT Quality of Service Handbook Generalized Service Volume Tables). This could result in undesirable vehicle travel time delays to the Town's residents, delays in freight & goods movement, and other regional travel impacts through diversion of trips to other roadways.

**Recommendation for Technical Assistance Comment #1:**

The Town should reconsider the adoption of policies (2.2.5 and 2.2.6) that will constrain the future number of lanes on Okeechobee Boulevard. This policy could result in congestion within the area the Town has targeted for preservation of rural lifestyle and negatively impact quality of life with extended travel times to reach desired destinations. Alternately, the Town should allow for needed capacity improvements to occur but at a speed consistent with the Town's rural character and controlled through appropriate roadway design elements.

**Technical Assistance Comment #2 (Future Land Use Element Objective 1.2 and related policies):**



The Town is proposing a revised Objective 1.2 and related policies 1.2.1 and 1.2.3 that will direct rural style commercial center development consisting of accessible shopping, recreation, and employment opportunities for Town residents and substantial equestrian land uses away from Okeechobee Boulevard and specifically target all this activity within the Town along the Southern Boulevard/State Road 80 (SR 80) Corridor at the southern municipal boundary of the Town.

**1.2 Objective:**

Development of a rural style commercial center consisting of accessible shopping, recreation, and employment opportunities for Town residents, shall be limited to the Southern Boulevard Corridor.

**1.2.1 Policy:**

The Town shall limit new commercial development to areas south of East Citrus Road Drive border to border

**1.2.3 Policy:**

The Town shall may endorse a substantial equestrian facility along the Southern Boulevard Corridor.

Implementation of this objective and policies has the potential to create adverse impacts to SR 80, a Strategic Intermodal System (SIS) facility. The SIS consists of a statewide network of highway corridors that are intended to serve long distance and higher speed traffic. The Department projects that SR 80 will not have sufficient capacity in the future to serve the demand created by existing and future development. The proposed objective and policies may result in a diversion of local trips within the Town to the SR 80 Corridor to satisfy local home-based shopping trips. This potential infusion of local trips has the potential to degrade the intrastate functionality of SR 80 by reducing speeds and decreasing capacity of the roadway. Additionally, these diverted trips may access SR 80 via local Town roadways, increasing through traffic on local roads.

**Recommendation #1 for Technical Assistance Comment #2:**

The Town should consider the implementation of strategies to offset the impacts of local trips on SR 80 and assist the Department to protect the important functions of the SIS. The Department previously communicated strategies to the Town on February 20, 2017 (Amendment number 17-1ESR). For example, the Town could update the comprehensive plan to identify additional roadway connections between A Road and F Road and between Okeechobee Boulevard and SR 80 on Map TRN-2.8 (Future 2030 Number of Lanes) to serve existing and to guide future planned developments. Additionally, language regarding Tangerine Drive in Policy 1.2.4 could be strengthened relating to the roadway's function as a parallel reliever to SR 80 for local trips. Implementation of this strategy will allow for local trips from Loxahatchee Grove residents to be able to access developments along SR 80 without requiring direct access to SR 80. An example of this would be Seminole Palms Drive in Royal Palm Beach between Lamstein Lane and Royal Palm Beach Boulevard.

**1.2.4 Policy:**

The Town shall consider extension of Tangerine Drive from B Road to D Road.

**Recommendation #2 for Technical Assistance Comment #2:**

The Town should consider revising the objectives and policies in the Comprehensive Plan to allow non-residential uses that are consistent with the Town character to more appropriately be located where they are easily accessible to the preponderance of the Town's residents. Due to the heavy traffic volumes and regional and intrastate nature of trips on SR 80, it is unlikely that commercial development along the SR 80 Corridor will effectively serve the Town's need for neighborhood commercial uses. Okeechobee Boulevard should be able to fulfill this need and ensure the viability of such neighborhood type commercial uses. The Town could accomplish this and still preserve the rural character that is of such high importance to residents by adopting appropriate design guidelines and land development regulations for commercial uses. Similar guidelines and regulations have been adopted by other municipalities, such as the Town of Davie, to preserve their character. An example would be their architectural building design guidelines for their Western Theme Overlay District (See: [https://www.municode.com/library/fl/davie/codes/code\\_of\\_ordinances?nodeId=PTIICOOR\\_CH12LADECO\\_ARTXIIISPPLARDI\\_DIV11REACCEDI\\_S12-438.24BUDEGU](https://www.municode.com/library/fl/davie/codes/code_of_ordinances?nodeId=PTIICOOR_CH12LADECO_ARTXIIISPPLARDI_DIV11REACCEDI_S12-438.24BUDEGU)).

### **Technical Assistance Comment #3 (Transportation Element Policies):**

The Transportation Element includes a policy (2.2.6A) to designate Okeechobee Boulevard as a Rural Minor Collector in the Town's Comprehensive Plan.

#### **2.2.6 Policy:**

In order to maintain the two-lane section on Okeechobee Boulevard and protect its rural character, the Town shall support implementation of the following:

A. Designation of the section of Okeechobee Boulevard within Loxahatchee Groves as a Rural Minor Collector on the County's Roadway Classification Map and designed as a Rural Parkway'

This designation is inconsistent with the Federal Functional Classification assigned to Okeechobee Boulevard as an Urban Minor Collector. Census designated urban boundaries, not the character of an area, form the basis for designating if a roadway segment is within a rural or urban area. The Town is located within the Miami--Fort Lauderdale Urban Area. A download (large file) of the 2010 Federal Functional Classification and Urban Areas Boundary Map can be found at: [https://fdotwww.blob.core.windows.net/sitefinity/docs/default-source/statistics/hwysys/d4/2010fcubpalmbeachcounty.pdf?sfvrsn=b4c9502\\_2](https://fdotwww.blob.core.windows.net/sitefinity/docs/default-source/statistics/hwysys/d4/2010fcubpalmbeachcounty.pdf?sfvrsn=b4c9502_2).

Only roadways functionally classified as urban minor collector or above are eligible for Federal Surface Transportation Funds – the federal funds available to states and MPOs to construct transportation projects. As such, federal funding for roadway infrastructure that the Town may rely on in the future could be jeopardized by the inconsistency created by the Town's Policy 2.2.6A.

### **Recommendation for Technical Assistance Comment #3:**

The Department recommends that the Town consider amending Policy 2.2.6A and applicable Transportation Element Functional Classification Maps to display the correct and



official Federal Functional Classification of Okeechobee Boulevard in the Town's Comprehensive Plan.

The Department does not have any comments relating to the addition of new Introduction and Private Property Rights Elements and the deletion of the Public-School Facilities Element.

We request the Department of Commerce (DOC) include these technical assistance comments in the ORC report to the Town of Loxahatchee Groves. Once adopted by the Town, FDOT requests a digital copy of the final adopted Comprehensive Plan with the supporting data and analysis. If you have any questions, please do not hesitate to contact Kent Walia, Planning Supervisor at 954-777-4601 or [kent.walia@dot.state.fl.us](mailto:kent.walia@dot.state.fl.us), or Larry Hymowitz Planning Specialist III at (954) 777-4663 or [larry.hymowitz@dot.state.fl.us](mailto:larry.hymowitz@dot.state.fl.us).

Thank you.



Larry Hymowitz

Planning Specialist, Policy and Mobility Planning Section

Planning & Environmental Management - FDOT District Four

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*Together our actions have the power to save lives!*

