

February 9, 2026

The Honorable JohnPaul O'Connor
Mayor, City of Westlake
4001 Seminole Pratt Whitney Road
Westlake, Florida 33470

Dear Mayor O'Connor,

FloridaCommerce has completed its review of the proposed comprehensive plan amendment for the City of Westlake (Amendment No. 25-01ER), which was received on December 11, 2025.

FloridaCommerce has reviewed the proposed amendment in accordance with the state coordinated review process set forth in sections 163.3184(2) and (4), Florida Statutes (F.S.), for compliance with Chapter 163, Part II, F.S.

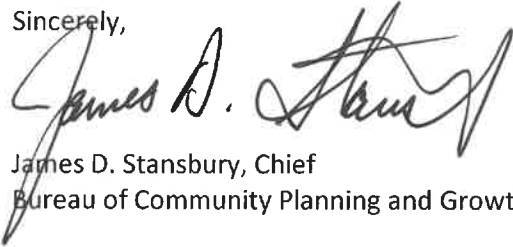
The attached Objections, Recommendations, and Comments Report outlines FloridaCommerce's findings concerning the amendment. FloridaCommerce has identified an objection and has included recommendations regarding measures that can be taken to address the objection. FloridaCommerce is also providing a comment. The comment is offered to assist the local government but will not form the basis for a determination of whether the amendment, if adopted, is "In Compliance" as defined in section 163.3184(1)(b), F.S. Copies of comments received by FloridaCommerce from reviewing agencies, if any, are also enclosed.

The City should act by choosing to adopt, adopt with changes or not adopt the proposed amendment. For your assistance, the procedures for final adoption and transmittal of the comprehensive plan amendment are enclosed.

The second public hearing, which shall be a hearing on whether to adopt one or more comprehensive plan amendments, **must be held within 180 days** of your receipt of FloridaCommerce's attached report, or the amendment will be **deemed withdrawn** unless extended by agreement with notice to FloridaCommerce and any affected party that provided comment on the amendment pursuant to section 163.3184(4)(e)1., F.S. **The adopted amendment must be transmitted to FloridaCommerce within ten working days after the final adoption hearing or the amendment shall be deemed withdrawn pursuant to section 163.3184(4)(e)2., F.S.**

FloridaCommerce staff is available to assist the City to address the objection and comment. If you have any questions related to this review, please contact Jon Coulter, Planning Analyst, by telephone at (850)717-8421 or by email via Jon.Coulter@Commerce.fl.gov.

Sincerely,



James D. Stansbury, Chief
Bureau of Community Planning and Growth

JDS/jc

Enclosures: Objections, Recommendations, and Comments Report
Procedures for Adoption
Reviewing Agency Comments

cc: Osniel Leon, AICP, City Planner, City of Westlake
Thomas Lanahan, Executive Director, Treasure Coast Regional Planning Council

**Objections, Recommendations and Comments Report
Proposed Comprehensive Plan Amendment
Westlake 25-01ER**

The Florida Department of Commerce has identified an objection and a comment regarding Local Government's proposed comprehensive plan amendment. The objection and comment are provided below, along with recommended actions the City could take to resolve issues of concern. If the City adopts the plan amendment without adequately addressing the objection, FloridaCommerce may find the amendment not in compliance with Chapter 163, Part II, Florida Statutes (F.S.), pursuant to section 163.3184(4)(e)4., F.S. Comments are offered to assist the local government and will not form the basis for a compliance determination.

FloridaCommerce staff has discussed the basis of the report with local government staff and is available to assist the City to address the objection and comment.

I. Objection 1: Planning Horizons

Amendment 25-01ER proposes a new 10- and -20-year planning horizons of 2035 and 2045, respectively. However, the proposed amendment does not provide adequately meet the planning periods required by Section 163.3177(5)(a), F.S. To meet the statutory requirement, the short-term planning period should be through at least the year of 2036 and the long-term planning period should be through at least the year 2026.

The proposed Amendment does not update the City's Comprehensive Plan elements to address the required planning periods, based upon relevant and appropriate data and analysis, consistent with the requirements of section 163.3177(1)(f), F.S., that all mandatory and optional elements of the comprehensive plan and plan amendments shall be based upon relevant and appropriate data and analysis by the local government. Pursuant to section 163.3177(2), F.S., coordination of the elements of the local comprehensive plan shall be a major objective of the planning process, and the elements shall be consistent. Where data is relevant to several elements, consistent data shall be used, including population estimates and projections, unless alternative data can be justified for a plan amendment through new supporting data and analysis. Updates to the required elements and optional elements of the comprehensive plan must be processed in the same plan amendment cycle.

The proposed Amendment does not update all the elements of the Comprehensive Plan and the planning periods based upon relevant and appropriate data and analysis of permanent and seasonal population estimates and projections consistent with the requirements of sections 163.3177(1)(f)3., and 163.3177(2), F.S. The proposed Amendment does not update the Comprehensive Plan elements, including the Future Land Use Map (FLUM) series, to be coordinated and consistent based upon updated population estimates and projections consistent with the requirements of sections 163.3177(1)(f)3., and 163.3177(2), F.S. The proposed Amendment does not provide data and analysis that addresses the 10-year housing analysis as required in sections 163.3177(1)(f)3., 163.3177(6)(a)4., 163.3177(6)(f), F.S. This analysis must be based on housing needs, which shall include the number and distribution of dwelling units by type, tenure, age, rent, value, monthly cost of owner-occupied units, and rent or cost to income ratio, and shall show the number of dwelling units that are substandard. The data and analysis shall also include the methodology used to estimate the condition of housing, a projection of the anticipated number of households by size, income range, and age of residents derived from the population projections, and the minimum housing need of the current and anticipated future residents of the jurisdiction.

The proposed update to the Comprehensive Plan is currently not based upon relevant and appropriate data and analysis of public facilities (potable water, sanitary sewer, solid waste, stormwater and transportation facilities) addressing the following for the required updated planning periods: (1) current and projected demand upon public facilities based upon relevant and appropriate population estimates and projections; (2) current and projected designed capacity of public facilities; (3) current and projected operating levels of service of public facilities; (4) identification of any improvements that are needed to public facilities, including the timing and scope of such improvements, in order to achieve and maintain the adopted level of service standards of public facilities; and (5) coordination of any need improvements with the Capital improvements Element.

The proposed update to the Comprehensive Plan is not based upon relevant and appropriate data and analysis consistent with the requirements of Section 163.3177(6)(a)2., F.S., for the duration of the required planning periods.

Statutory Authority: Sections 163.3177(1)(f), 163.3177(1)(f)3., 163.3177(2), 163.3177(5)(a), 163.3177(6)(a), 163.3177(6)(a)2., 163.3177(6)(b), 163.3177(6)(c), 163.3177(6)(e), 163.3177(6)(f), 163.3177(6)(f)2., 163.3184(4) and 163.3191, F.S.

Recommendation: The City must revise the proposed Amendment 25-01ER to ensure the City's Plan contains two planning periods in accordance with section 163.3177(5)(a), F.S., which requires local governments to adopt two required planning periods in their comprehensive plans, a 10-year planning period and a 20-year planning period after the plan's adoption. The necessary updates must also be based upon relevant and appropriate data and analysis for public facilities for the planning periods. The City's update to the long-term and short-term planning horizons proposed to meet the requirements of section 163.3177(5)(a), F.S., must be based upon relevant and appropriate data and analysis. The update to the planning periods shall consider the following:

- Data and analysis of the permanent and seasonal population estimates and projections;
- Coordination of and consistency between all of the elements of the Comprehensive Plan; and
- Data and analysis of public facilities (potable water, sanitary sewer, solid waste, stormwater, and transportation facilities).
- Data and analysis demonstrating the condition, projection, and the need for housing for the next 10-years pursuant to section 163.3177(1)(f)3., 163.3177(6)(a)4., and 163.3177(6)(f), F.S.

Further, the City must revise the Future Land Use Element to be based upon relevant and appropriate data and analysis consistent with the requirements of Section 163.3177(6)(a)2., F.S., for the required planning periods. The above data and analysis should also be clearly reflected within the adopted Future Land Use Map (FLUM) series. The proposed planning horizon and map titles should also clearly be reflected in the FLUM series.

In responding to this objection, the City should consider the provisions under Chapter 2025-190, L.O.F., which was approved on June 26, 2025, and applies retroactively to August 1, 2024. The City should ensure that the adopted amendment is not more restrictive or burdensome.

Comment 1: Intergovernmental Coordination

FloridaCommerce recommends that the City of Westlake coordinate with the South Florida Water Management District to address their technical assistance comments regarding the proposed amendment and make edits to the Water Supply Facilities Work Plan and Conservation Element Data and Analysis.

SUBMITTAL OF ADOPTED COMPREHENSIVE PLAN AMENDMENTS

FOR STATE COORDINATED REVIEW

Section 163.3184(4), Florida Statutes

NUMBER OF COPIES TO BE SUBMITTED: Please submit electronically using FloridaCommerce's electronic amendment submittal portal "**Comprehensive Plan and Amendment Upload**" (<https://fldco.my.salesforce-sites.com/cp/>) **or** submit three complete copies of all comprehensive plan materials, of which one complete paper copy and two complete electronic copies on CD ROM in Portable Document Format (PDF) to the State Land Planning Agency and one copy to each entity below that provided timely comments to the local government: the appropriate Regional Planning Council, Water Management District, Department of Transportation, Department of Environmental Protection, Department of State, the appropriate county (municipal amendments only), the Florida Fish and Wildlife Conservation Commission and the Department of Agriculture and Consumer Services (county plan amendments only), and the Department of Education (amendments relating to public schools), and for certain local governments, the appropriate military installation and any other local government or governmental agency that has filed a written request.

SUBMITTAL LETTER: Please include the following information in the cover letter transmitting the adopted amendment:

_____ State Land Planning Agency identification number for adopted amendment package.

_____ Summary description of the adoption package, including any amendments proposed but not adopted.

_____ Ordinance number and adoption date.

_____ Certification that the adopted amendment(s) has been submitted to all parties that provided timely comments to the local government.

_____ Name, title, address, telephone, FAX number and e-mail address of local government contact.

_____ Letter signed by the chief elected official or the person designated by the local government.

ADOPTION AMENDMENT PACKAGE: Please include the following information in the amendment package:

_____ In the case of text amendments, changes should be shown in strike-through/underline format.

_____ In the case of future land use map amendment, an adopted future land use map, **in color format**, clearly depicting the parcel, its existing future land use designation and its adopted designation.

_____ A copy of any data and analyses the local government deems appropriate.

Note: If the local government is relying on previously submitted data and analysis, no additional data and analysis is required.

_____ Copy of executed ordinance adopting the comprehensive plan amendment(s).

Suggested effective date language for the adoption ordinance for state coordinated review:

"The effective date of this plan amendment, if the amendment is not timely challenged, shall be the date the state land planning agency posts a notice of intent determining that this amendment is in compliance. If the amendment is timely challenged, or if the state land planning agency issues a notice of intent determining that this amendment is not in compliance, this amendment shall become effective on the date the state land planning agency or the Administration Commission enters a final order determining this adopted amendment to be in compliance."

_____ List of additional changes made in the adopted amendment that the FloridaCommerce did not previously review.

_____ List of findings of the local governing body, if any, that were not included in the ordinance and which provided the basis of the adoption or determination not to adopt the proposed amendment.

_____ Statement indicating the relationship of the additional changes not previously reviewed by the FloridaCommerce to the ORC report from the FloridaCommerce.

Harris, Donna

From: Germain, Peter <pgermain@sfwmd.gov>
Sent: Friday, January 09, 2026 11:35 AM
To: oleon@chenmoore.com
Cc: DCPexternalagencycomments; Stoutamire, Terri; sheidt@tcrpc.org; nzacarias@chenmoore.com; zburgess@westlakegov.com
Subject: [EXTERNAL] - Westlake 25-01ESR and 25-02ESR Comment Letter

CAUTION - "This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe."

The South Florida Water Management District (District) has completed its review of the proposed amendment package submitted by the City of Westlake (City). The submittal package includes the City's Comprehensive Plan Evaluation and Appraisal Review (EAR) and Water Supply Facilities Work Plan update (Work Plan). The District provides the following comments under Section 163.3184(3)(g), Florida Statutes (F.S.). The important state resource that is impacted by this amendment is regional water supply. The following comments need to be addressed before final adoption of this amendment:

Comprehensive Plan

Chapter 5. Conservation Element Data and Analysis

- 1) Be advised of a typo on page 9 under "Water Conservation and Reuse Water" the sentence "SID will modify its permit over the long-term planning period consist with SFWMD requirements as the City develops and agricultural land converts to other land uses." Replace the word consist with consistent.

Water Supply Facilities Work Plan

3.4 Conservation:

1. The conservation section in the Work Plan references the South Florida Water Management District's *Xeriscape Plant Guide II* as the basis for Florida-Friendly landscaping requirements. Section 373.185, Florida Statute, was revised in 2009 to replace the term xeriscaping with Florida-friendly landscaping. Please update this reference to reflect Florida-Friendly Landscaping resources to ensure consistency with current District practices.
2. Please expand Section 3.4 to include a brief forward-looking discussion describing how water conservation programs may be maintained, enhanced, or expanded over the planning horizon as development occurs and land uses transition from agricultural to urban. This discussion should describe how conservation will continue to offset future water demand consistent with Section 163.3177(6)(c)3., F.S., and the Applicant's Handbook.
3. The conservation section primarily describes conservation measures implemented by Seminole Improvement District (SID), Palm Beach County, or through State codes. Please clarify the City's independent role in implementing, enforcing, or supporting conservation measures through its Comprehensive Plan policies, Land Development Regulations, development review process, or local ordinances. Consider enhancing the conservation section by briefly identifying expected

conservation outcomes or programmatic objectives (e.g., reduced irrigation demand through Florida-Friendly landscaping, indoor water efficiency through plumbing standards, increased public awareness through education programs). This additional detail would demonstrate how conservation measures contribute to meeting future water supply needs.

The District requests that the City forward a copy of the adopted amendment to the District at the following email mailbox address: SFLOCALGOVPLAN@sfwmd.gov. Please contact me if you have any questions or need additional information.

Best,



Peter Germain

Policy and Planning Analyst – Specialist

Water Supply Implementation Unit

South Florida Water Management District

3301 Gun Club Road, West Palm Beach, FL 33406

Office: 561-682-6779 | pgermain@sfwmd.gov

