1000 Friends of Florida conducted a survey on Florida’s Development of Regional Impact (DRI) Process to gather public input on perceptions about the effectiveness of this program, whether it should be retained, and what could be done to improve it. The anonymous survey, which ran from June 16, 2014 to July 15, 2014, was promoted via email alerts, social media and 1000 Friends of Florida’s website. A total of 276 individuals responded. 1000 Friends designed this survey to gather input from a wide variety of individuals (citizens, elected officials, developers, attorneys, planners and others) and it was not intended to be statistically significant. 1000 Friends has reviewed the responses and a summary is provided below. We sincerely appreciate the time and thought that went into these comments.

Background

Given some of the recent legislative proposals to further exempt projects that would otherwise qualify as a Development of Regional Impact (DRI), 1000 Friends of Florida asked for input on whether or not the program should continue and/or what changes should be made to improve its effectiveness.

First coming into existence in 1972, DRIs were meant to give the state a voice in local approvals of very large scale developments that, because of their size, scale and/or location, would cause regional impacts to infrastructure, environment and wildlife habitats beyond the host jurisdiction. At that time, it was the only state growth management control as the mandatory comprehensive planning requirements from the 1975 and later 1985 laws had yet to be enacted.

The system created a process of state and regional review and comment prior to any final local approval of a project that met certain development thresholds, based on county populations. Developers were required to submit surveys and/or reports about their proposed projects to the regional planning council and various state agencies documenting their impacts or lack thereof. The state role was to ensure that regional impacts had been mitigated, and confirm the DRI’s consistency with local, regional and state plans.

As the years passed and local comprehensive plans, state plans and regional policy plans were adopted, questions began to arise about the value of the DRI process. Many projects avoided the process entirely by simply ducking under the applicable threshold. Development interests frequently complained about the cost and time to go through the process, suggesting that much of the exercise was duplicative of other existing regulatory programs. Others welcomed the state involvement due to what was seen as local government complicity in approving projects regardless of the impacts. Many complained about the lack of finality in ever completing a DRI and its obligations. And still others felt it was very
appropriate that developers were being required to make significant financial contributions to protect roadway capacities and environmental features. One incentive for having a DRI is that it represents one of the few “vesting” allowances under growth management law.

Also in play, almost from the start, was a growing list of “exemptions” that included waivers for certain public attractions, jobs creation, seaport and airport master plans, and colleges and universities. Recently, more than 242 cities and 8 counties have been exempted outright through the “dense urban land areas” (DULAs) program enacted in 2010, and even more communities were about to be further exempted by the 2014 Legislature but that bill did not pass.

With all of this in mind, 1000 Friends of Florida posed several questions to its email distribution list. Below is an overview of the responses received.

Summary of Questions and Responses (276 replies)

The following are only meant to provide a sense of the comments received – please refer to the detailed survey to see the particular responses. Many responses were similar and are presented here in summary form to avoid repetition.

1. **Have DRIS hurt/helped to control sprawl? (97 replies)**

   Responses were across the board on this question. Some respondents indicated that the DRI process was helpful overall, others said it promoted sprawl, and still others indicated it had mixed results. Issued raised included that there were too many exemptions (DULAs, for example) for it to be effective, and there were so many developments below applicable thresholds that it promoted piecemeal development.

2. **What should be done with DRIs? (129 replies)**

   No consistent responses were received, and pros and cons have been heard before.

   Comments in favor of keeping it included: keep it but refine the process; use it as an incentive by exempting urban infill; provide more emphasis on water supply issues; include climate change assessments; add job creation metrics; add specific bailout/completion process; add process for assigning impact contributions when the original applicant sells the project.

   Comments supporting eliminating it included: rely on intergovernmental coordination process; eliminate it completely within designated urban boundaries.

3. **Value of existing DRI administrative rules? (31 replies)**

   Several responses said the rules were duplicative, but others indicated this was a necessary level of detail. There appears to be general agreement that the real value is the interagency
coordination that the rules foster.

4. **Can local comprehensive plans substitute for the DRI process? (113 replies)**

   Respondents who noted that comprehensive plans can substitute indicated: now that all local governments have comprehensive plans in place; if more citizen input is allowed.

   Respondents who said comprehensive plans cannot substitute for the DRI process included: local plans do not deal with regional and/or extra-jurisdictional impacts; taxpayers will be worse off; the Intergovernmental Coordination Element should be adequate but the existing version won’t work.

   Several felt the larger (not defined) local governments could handle this but not the rural or smaller ones.

5. **Which issue areas covered in the DRI process would be most impacted if DRIs went away? (51 replies)**

   Environmental protection; sprawl analyses; loss of fair share payments; no impacts – issues already being covered; recognition of multi-jurisdictional impacts; loss of predictability; vesting and/or build-out obligations; transportation improvements; any follow through on development order conditions.

6. **Does your local government/RPC review and report on approved DRI conditions? (46 replies)**

   Conditions reviewed but little enforcement; question of who is responsible for enforcement; several note that RPCs are no longer funded by the state to do this even though all do to the extent resources are available.

7. **Are interlocal agreements in place to deal with/coordinate on extra-jurisdictional impacts? (31 replies)**

   There is no consistent statewide process, although several communities have such agreements in place; some local governments have them and others don’t; MPOs may be the best place to do this for transportation issues.

8. **Does the host local government share mitigation costs with its neighbors? (39 replies)**

   Some do but others don’t; developers should get credit when fair-share payments benefit an entire area; all mitigation costs should be reduced to incentivize infill; costs and benefits should be shared but local plans are too weak to do this.
9. **Should “pipelining” be continued which allows for multiple mitigation costs to be applied to a single facility in order to complete at least one piece of infrastructure instead of partial payments on several? (40 replies)**

There is an uneven history on this. Several say yes: this is the only way DRIs can work; allow if taxpayers not required to make up the difference; need to have the consent of all impacted facilities; can only determine on a case-by-case basis.

10. **Suggestions for reforming or eliminating the DRI process? (93 replies)**

Some of the reasons for keeping/reforming it included: have to have state oversight; only way to protect wetlands/ecosystems and deal with extra-jurisdictional impacts; should have two processes, one for small and one for large local governments; add a “DRI” element to local plans; add a clear process for completing a DRI; eliminate but strengthen state and RPC authority to deal with sprawl; eliminate it if other parts of Chapter 380 improved (i.e., ACSC); keep it but require each DRI to improve the built environment.

Those in favor of eliminating the DRI process commented: get rid of it; no longer needed as TCEAs and DULAs have undercut the DRI process; require original DRI applicant to assign entitlements/mitigation to subsequent owners; eliminate but to retain regional perspective combine RPCs, WMDs, MPOs, FDOT and DEP district offices into regional government centers; must improve Intergovernmental Coordination Elements where multiple DRIs are located; convene an ELMS type process to comprehensively consider the best outcome; develop regional growth plans like central Florida’s “How Shall We Grow” and require all development to be consistent with it.

11. **Do you work with the DRI process on a regular basis? (42 replies)**

Most responders did not do this on a regular basis although about half of the responses were either from local government staff or private consultants/attorneys.
Florida’s Development of Regional Impact (DRI) Process

1000 Friends of Florida conducted a survey on Florida’s Development of Regional Impact (DRI) Process to gather public input on perceptions about the effectiveness of this program, whether it should be retained, and what could be done to improve it. The anonymous survey, which ran from June 16, 2014 to July 15, 2014, was promoted via email alerts, social media and 1000 Friends of Florida’s website. A total of 276 individuals responded. 1000 Friends designed this survey to gather input from a wide variety of individuals (citizens, elected officials, developers, planners and others) and it was not intended to be statistically significant. 1000 Friends is reviewing the responses and intends to release a position paper in September 2014.
**Q1 Have DRIs helped or hurt efforts to control sprawl in Florida?**

<table>
<thead>
<tr>
<th>Answer Choices</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Helped</td>
<td>56.62%</td>
</tr>
<tr>
<td>Hurt</td>
<td>20.22%</td>
</tr>
<tr>
<td>Unsure</td>
<td>23.16%</td>
</tr>
</tbody>
</table>

**Total** 272

<table>
<thead>
<tr>
<th>#</th>
<th>Please elaborate if desired.</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>DRI's in my view have served as an important &quot;stop-gap&quot; to unrestricted large/regional developments. They historically served to assure that these very large development projects did not &quot;overrun&quot; the ability of a region to support it.</td>
<td>7/15/2014 7:51 PM</td>
</tr>
<tr>
<td>2</td>
<td>The DRIs allow very large developments to work to get regional rules to trump local rules.</td>
<td>7/15/2014 9:21 AM</td>
</tr>
<tr>
<td>3</td>
<td>Controlling sprawl was never a major expectation of the original DRI process, and that unfortunate oversight resulted in DRIs both combating, and sometimes encouraging, sprawl across the state. It did not always result in Smart Growth (e.g. Destin area DRIs). What the DRI process did often result in was better ensuring the addressing of extra-jurisdictional infrastructural impacts and the protection of important natural resources. Unfortunately, the process was sometimes misused to drive up the price of sensitive natural areas prior to state park acquisition.</td>
<td>7/14/2014 8:59 PM</td>
</tr>
<tr>
<td>4</td>
<td>The DRI process has done nothing to halt sprawl. It is the sub-DRI, single purpose residential subdivisions that comprise the &quot;sprawl landscape. By making planned, mixed-use projects more expensive and administratively burdensome, the DRI process has actually encouraged sprawl as developers sought to avoid DRI review.</td>
<td>7/14/2014 6:37 PM</td>
</tr>
<tr>
<td>5</td>
<td>Prevents one municipality or county from approving and making zoning changes that are detrimental to an adjacent municipality or county; and allows large developers a &quot;one stop&quot; process of resolving disputes.</td>
<td>7/14/2014 5:18 PM</td>
</tr>
<tr>
<td>6</td>
<td>When the issue of need was addressed, it was clear that over development, especially in rural areas, was leading to sprawling patterns of development. DRI project were much better at containing sprawl into more compact and mixed use projects where complementary land uses lessened the impacts from sprawl. Furthermore, the impacts from these larger project were well quantified and the impacts were better mitigated.</td>
<td>7/14/2014 3:23 PM</td>
</tr>
<tr>
<td>7</td>
<td>In theory, it should have helped. In practice, we can see that economic profits for the few have continued to be held more important than quality of life for the many. Perhaps things would be even worse without DRI review.</td>
<td>7/14/2014 3:19 PM</td>
</tr>
<tr>
<td>8</td>
<td>They help if required in suburban and rural areas, but hurt if the review process is required for good urban infill.</td>
<td>7/14/2014 2:30 PM</td>
</tr>
<tr>
<td>9</td>
<td>Helped some locally. Unsure state wide.</td>
<td>7/14/2014 1:55 PM</td>
</tr>
<tr>
<td>10</td>
<td>The DRI process ensures review and oversight for jurisdictions not otherwise willing or able to control sprawl.</td>
<td>7/14/2014 1:23 PM</td>
</tr>
<tr>
<td>11</td>
<td>DRIs getting approved in locations where they create sprawl.</td>
<td>7/14/2014 1:15 PM</td>
</tr>
<tr>
<td>12</td>
<td>The DRI process has not hindered urban sprawl. I have participated in DRI's that have been both within urban cores and outlying areas. The process does nothing to reduce sprawl, the result has been larger roadways, reduction in open space/green space, more infrastructure needs, etc. with no transit requirements. The urban development boundary line in Miami-Dade is a joke, constantly extended to accommodate development.</td>
<td>7/14/2014 1:10 PM</td>
</tr>
<tr>
<td>13</td>
<td>DRIs have helped to prevent costly urban sprawl by promoting cluster or consolidated development that provides for community planning districts that pay for it's own infrastructure, preserving greater open space, and preventing scattered and haphazard development.</td>
<td>7/14/2014 12:56 PM</td>
</tr>
<tr>
<td>14</td>
<td>Review criteria (e.g. affordable housing impacts, infrastructure impacts, etc.) required by the DRI process provide necessary oversight that local jurisdictions may or may not address due to political constraints/pressures.</td>
<td>7/14/2014 12:49 PM</td>
</tr>
<tr>
<td>15</td>
<td>When done correctly, DRIs do help to limit sprawl by thier mixed landuses. However, thier location is just as important.</td>
<td>7/14/2014 12:48 PM</td>
</tr>
<tr>
<td>16</td>
<td>Most projects that have spurred or advanced sprawl have fallen below the thresholds of a DRI review.</td>
<td>7/14/2014 12:48 PM</td>
</tr>
</tbody>
</table>
All but a few DRI's have been low density, suburban greenfield developments that exacerbate sprawl.

The DRI is a vital step in the land use review processes of local governance. There must exist a state overview with statutory authority to assess and provide definitive analysis of impacts on urban and environmental systems proposed land use changes that extend beyond the scope of local governance reviews and jurisdictions.

All transit is subsidized we need financial offset for transit to compensate for increased traffic.

Without a doubt, DRI's have promoted developers going outside developed urban areas and may spur sprawl bigger.

Development approvals initially for 30 years are now extended on an unlimited basis, partly due to the economy but now for every emergency declaration. These approvals have allowed development to be planned initially in areas well beyond the existing urban/suburban development pattern and then not started for many years but locked in terms of development standards that are dated and suburban in nature, when we should be considering what the needs of 2014 and beyond, rather than those of the 1980s, 1990s and now 2000 boom years. No one should get an approval for more than 10 years!

I think there have been some unintended consequences of concurrence that has actually encouraged sprawl rather than curb it. Many projects end up getting built further out where "capacity" is available or land is cheaper, rather than directed towards infill projects in urbanized areas.

DRI's have provided a mechanism to evaluate and mitigate regional impacts. It must have worked to control sprawl somewhat because the development-controlled Legislature has continued to gut controls and made loop holes.

In terms of getting key issues on the table for discussion yes. But the process became bigger then its value to getting the right thing done.

DRI's have not successfully managed sprawl itself. The program addresses some of the "impacts" of growth, but has not been the appropriate vehicle to manage where growth occurs.

Although well intention, it is obvious that the regulatory structure of the DRI process did nothing to control sprawl. The planning processes have not promoted compact pedestrian friendly development and there is a lack of incentive to the development community to embrace development forms that are not sprawl like.

The State of Florida has suffered after the loss of the DCA. Worst thing to happen to us. Local government apparently has trouble governing themselves. Maybe its the lure of campaign contributions, cronyism, personal gain, etc but large developments seem to be able to bypass the system and due process including public notification. Comp plans have been shortened along with the permit process, waiving of fees and burdening citizens with increased taxes to pay for infrastructure. WE NEED HELP!

While they have not stopped such activity as leapfrog development, the process does expose such attempts and at least give opponents the chance to fight.

While they have not stopped such activity as leapfrog development, the process does expose such attempts and at least give opponents the chance to fight.

Process is to political. Often it is the large land owners that call the tune.

When DCA was able/willing to appeal development orders it helped provide a check on local govt decisions that were not consistent with state objectives.

The focus of DRI is to identify and mitigate impacts. My experience is primarily with rural and lower population areas where growth is valued. I think the DRI process, like every other regulation, establishes a minimum floor that attempts to protect against some of the worst actions but it hurts developers who are attempting to provide first class community building. It adds a lot of unnecessary and expensive actions that do not improve the quality of the development.

The DRI process, like every other regulation, establishes a minimum floor that attempts to protect against some of the worst actions but it hurts developers who are attempting to provide first class community building. It adds a lot of unnecessary and expensive actions that do not improve the quality of the development.

It has promoted large developments mostly away from urban centers with the guise of "self sustainabilty"

DRI's have produced quality developments subject to greater review than sub-DRI developments, and to at least some extent subject to more mitigation requirements than sub-DRI development.

Because they tend to be larger projects, they have also tended to be located on the urban fringe. It does not appear they have been effective in encouraging development within urban areas. They may have encouraged or supported higher density and intensity of development for fringe projects and perhaps limited sprawl to some extent in that fashion.

DRI's have neither helped or hurt the control of sprawl. Some DRI's have shown to be good true full mixed-use and vibrant communities while others are still just one huge monoculture of single-family homes sitting in the middle of nowhere.

The DRI process has been the first line of defense for protecting natural resources and encouraging well planned development. I doubt that Florida would be as attractive if it hadn't had the DRI process. It has also set the standard for development review, and continues to do so in places where planning is not respected or funded or politically accepted.

"Planning" as such has not stopped sprawl.

It has been used to justify large developments outside of and far removed from existing urban areas.

DRI's have allowed development away from other urban areas.

The process has become so very long, expensive regulatory rather than long-term planning that most developers build incremental amounts under threshold to avoid. Others simply aren't willing to spend any new DRI's and wanna DRI's are seeking to get annexed into DULAs. For example, if in a non-DULA County in Central FL, if not tied to a parcel, plans are made to go into one of the small cities which meets the DULA criteria. Additionally, what with ECFRPC's M&M requirement, there is no predictability on what transportation cost will be and it is even less predictable because of urban DULAs.

Because of the involvement of multiple agencies, DRI's allow for better planning to provide services and facilities.

From my personal experience, DRI's were a deterrant to urban and suburban infill and pushed development to outlying areas that had neither the infrastructure nor the expertise or tax base to create and implement it. Additionally, the DRI process more often than not was used as weapon by anti-development groups against developers already facing financial feasibility challenges.

DRI's have neither helped nor hurt efforts to control sprawl.

All transit is subsidized we need financial offset for transit to compensate for increased traffic.
The developers would find the most “economic” way to develop, which tends to be sprawling to begin with. Nevertheless, the DRI process ensures quality infrastructures be in place in quantity. Without it, residents and public eventually will be short changed with substandard infrastructures.

It depends on how and where it was applied to particular projects. Oversimplified question. For example, large scale mixed use DRIs are different than individual uses that are DRIs because of their size. Fundamentally, the DRI process can be used to address transportation impacts in a multi modal way if the local planning conduct allows it.

The recent case in Walton County (Sandestin DRI) illustrates the “overlooking” of DRI incremental changes with either an uninterested or incapable jurisdictional planning entity. It is the execution and gaps in institutional knowledge/lack of understanding at the local level that makes me wonder about the real effectiveness of the process.

The process has helped in that it allows all governments to pre-address and attempt to prepare in coordination with the development proposed. The difficulty is the tendency to “push off” many tasks until “later” which creates problems with implementation and tracking as the development ownership dispenses to different parties - each one not claiming any responsibility, but still claiming “entitlement”. It leaves the government agencies “stuck” between the private and public parties which the DRI process was intended to avoid.

I believe that DRIs have improved the quality of development and helped reduce impacts on existing residents. As a substitute for urban growth boundaries or other, similar tool, the process has been a failure.

The DRI’s are not responding to demand. They artificially create communities which can not and do not sustain themselves during times of economic challenges. The burdens then shifts to the taxpayers.

DRIs actually provide a disincentive to planning. This is an outdated regulatory process that was set up before there were mandates for local government comprehensive plans in Florida. It is duplicative of other local and regional permitting processes through local governments, water management districts, DEP, the Army Corp, etc. They additional burdens of the process result in development proposals that stay under thresholds and therefore result in the exact opposite of what was intended.

The hard truth is: How many have been rejected or substantively changed?

There seems to be no real relationship. Sprawl was mostly the result of concurrency.

DRIs are master planned communities or projects due to their density or intensity. DRIs are not one and the same with urban service areas. This question is leading as it is the urban service area that controls sprawl.

They certainly helped in an era in which managing growth was not a well worn practice at many local governments. However, many DRIs were themselves sprawling developments and often located well beyond the limits of most existing infrastructure networks. Even then the process took years and at huge costs to the developer and community, we should ask was the outcome worth it?

Helped and hurt

I think it is a bit of both. Unfortunately, folks have come up with ways to work around the rules making much of the review not meaningful. It is helpful to review regional impacts but I don’t think the impacts have been sufficiently mitigated.

While it does not do as much to curb sprawl as it does to induce some infrastructure, service and design qualities, in it’s absence I’d strongly suspect that more leap-frog development would have occurred.

DRIs are typically large areas of land and, as such, are usually rural in nature. So, in a sense, they promote sprawl except to the extent they include some level of density. In my observation, though, they talk a good line until time to build, and then they are largely detached homes and single-use commercial development. To me that’s sprawl. In the Florida context I'm not sure what it is. But it is not as bad as the current sector planning fiasco....

They almost always get approved in the hinterlands.

The additional reviewing and planning processes currently involved in DRIs has allowed for smarter growth in Florida. The additional scrutiny to ensure that a development is planned correctly as to not affect surrounding communities and the environment in a negative manner has prevented sprawl by assessing the necessity of a development project in relation to those effects. If the development project is necessary, the negative effects to surrounding areas, or the local ecosystems, are mitigated as well as unnecessary sprawl is prevented.

One of few effective mechanisms available to deal with extra-jurisdictional impacts

Sprawl, specifically government sprawl, grows exponentially within DRI statutes - each perilous to individual property owners. Each statute limiting access, restricting use and/or disposal of property, is weighted so heavily in favor of government that little or no regard to the security the property rights of land owners.

For one thing, they have required communities to at least think regionally. People live regionally, but they are under-educated to think regionally.

It depends on the region and the local issues. It has not helped in Dade and Broward. I guess it has to do with each RPC and ultimately each local government

Theoretically, the DRI Process should have stemmed urban sprawl and protected Florida’s dwindling natural resources, aquifer recharge areas, and native habitats for wildlife. The DRI process SHOULD have insured that Florida’s residents were made aware of any proposed large developments that would affect their neighborhood, county, natural resources, waterways, roads, rural character, and way of life. Residents / taxpayer / voters should have had the opportunity for Public Comment or Vote on whether these typically detrimental Developments of Regional Impact would be allowed/ permitted, or what changes in infrastructure or protection of resources would be necessary in order for the DRI to proceed in a sustainable and locally/regionally compatible way. The state-level DCA, when it existed, and when it was staffed with honest, conscientious civil servants, DID raise concerns and recommend that some DRIs NOT be permitted due to insufficient concurrency, overtaxing of area aquifers (no proof that the aquifer could sustain the gargons/day that the DRI was going to be allowed to withdraw), or incompatibility with the Master Plan (Land Use / Land Cover) or rural character of the area. Once DCA was eviscerated, there was no state-level “check” or balance to insure that corrupt or incompetent regional, county, or municipal planners and government officials would give the local public sufficient notice or input on the DRIs that would impact them and their present quality of life. Sadly, in many counties, like ours, ONE government official was allowed to decide whether the county and its people found a proposed DRI acceptable. Most residents/voters/taxpayers have NEVER been informed (via public notice, television coverage, media, registered mail, etc.) of ANY of the proposed DRIs that would impact their neighborhood, municipality, county, or region, and that would likely and FOREVER negatively change their quality of life.
68 Interests are very parochial; a local area may well overlook impacts to neighboring communities in order to obtain economic gain for themselves.

69 Two words Babcock Ranch. Two more Ave Maria. If the elected officials want sprawl - they will approve it no matter what process is in place. DRIs seem to be a means to keep consultants employed and making for a long long public hearing process.

70 The way they are structured has not helped control sprawl. It has become as much a pain for the local agency as for the developer. It's the projects right under the DRI limit that are sprawling out from the more compact areas.

71 The current DRI process is simply about density and "Exceli Planning" with no requirements or mandates for actual design and function of community. Actual "Planning" is left out of the process.

72 The residential units are built and then the commercial components are not, allowing those residential trips to go elsewhere, promoting more congestion and more sprawl.

73 Many cities' downtown areas have used DRIs and/or CRAs to help streamline the process of permitting large high rises in downtowns like Miami and Orlando. Sector Plans have chipped away from DRIs by being a mega DRI before there is much detail of development and well before the demand for units being planned. It's an entitlement.

74 DRIs have the advantage of facilitating the master planning of large acreages of land in exchange for greater predictability in the development process. The negotiation that surrounds them can facilitate the careful planning of these large projects. If the developer has deep pockets, the development "may" progress according to plan. If on the other hand the developer does not have enough money we may not get what was so carefully negotiated. Another aspect of DRIs that needed more careful study is the location of the DRIs; the work of 1000 Friends shows that some DRIs are not located in places that are "ripe" for development; this conclusion is also supported by empirical research on Florida's development pattern that shows that the pattern of development has much less centrality than many other states (see, for example, Ingram et al., 2009 and the review of the book by Steiner, 2011). When these developments develop more slowly than expected, some of the development rights should probably be extinguished. The second issue is that even when the projects are completed, they sometimes reflect leapfrog development that is expensive to build and expensive to acquire; all of this reinforces a pattern of socioeconomic ally segregated communities. A third issue is that they are not reviewed as to their compliance to local comprehensive plans, which are at best too easily amended and at worst totally irrelevant because local elected officials ignore them in the face of large scale landowners.

75 As a generalization, they have helped. Not that they have stopped anything, but have made developers realize that going greenfield can be as difficult as urban development.

76 The DRI process requires potential developers to subject proposed projects to increased scrutiny, thereby reducing the developments that do not stand up to increased scrutiny. In addition, the process requires that numerous state and federal agencies, as well as other affected interests, sit down to discuss the impact of the proposed development from their respective areas of expertise; this results in the sharing of information and expertise among the agencies that would not otherwise occur.

77 Helped. The process elicits participation from state govt. agencies and affected local governments (not just the govt. within whose jurisdiction the development lies) so all the onsite and offsite impacts can be addressed and mitigated for.

78 DRIs are a long, fairly elaborate process involving many state, local and regional agencies. However, put in enough money and time, and the project will inevitably be approved, more or less as proposed. It is my experience that DRIs do not stop or change projects in any substantial way that affects urban sprawl. Many are large, former ranch properties that end up creating major residential subdivisions that require driving on a wide, unfriendly major road leading to a main shopping or employment area.

79 Helped and hurt. The thresholds for requiring a DRI application are high enough that large landholdings are often carved up to create enough parcels that all escape the DRI process. The Barber family holdings on the east end of 30A might have been an integrated plan. Instead Doodle Harris, a speculator, convinced Geo Barber that the DRI process would be too much brain damage and to let Opodie carve it up. So each community west of Rosemary is an enclave, with none of the connections that could have relieved congestion on 39A.

80 For the most part different agencies collude to avoid DRI reviews. Take the requirement for a DRI review for a new paved runway. No review is required for a new sod runway, and paving such a sod runway has escaped DRI review as being a safety measure rather than a new development.

81 Not much of a help, but at least there was a process.

82 Count the number of units and commercial square feet approved since 1972. It's a lot. Many DRI's have failed. Inadequate infrastructure They vest too much development. Better to plan for it.

83 The city and county commissions routinely ignore their own planning and zoning staffs, so at least the DRI process provides some safeguards against massive over development.

84 Provided framework for master planned communities.

85 They help when used as they were intended. Recent changes that have been made to the process have eliminated many of the benefits and reduced the number of developments subject to review.

86 Though uncontrolled sprawl does occur....Sprawl of planned development has occurred. Yes, direct impacts of the development are controlled, but the secondary impacts are not. The "NEW SPRAWL looks better and addresses the impacts of the development, but the horizontal growth is still there. It's being done in larger chunks.

87 DRIs have had a number of unintended consequences. 1. Taken control out of the hands of local experts and centralized in a big bureaucracy. 2. Taken control out of the hands of planners and placed it in the hands of attorneys. 3. Provided an incentive for developers and builders to avoid large projects and instead take a piecemeal approach thus defeating the purpose of comprehensive planning. 4. Drove up the cost of development, added time to the process and did not stop sprawl or improve the quality of the end product.

88 I think it depends on the Development. I think some developments just used the DRI process because they had to based on size, others used the process the development unique communities using innovative planning techniques that were not available through traditional growth management methods.

89 But not as much as one might hope. We have been overbuilding Florida since its early beginnings.
In some instances the process itself has legitimized the approval of huge, sprawling developments that otherwise would not have been approved (piecemeal). In some instances it may have resulted in well-planned projects but definitely not in others. By definition, "regional impact" would suggest that the impacts (and possibly benefits) of the development are not contained or oriented to existing developed areas, but rather stretch in to the hinterlands. The DRI process is just a bigger way to justify and approve huge sprawling developments; all of the mitigation and financial commitments should and could be done regardless - unless a local government has a fairly meaningless comprehensive plan.

The DRI process was an important component of Florida's growth management program. Sadly, our current governor and Legislature have rescinded the law and abandoned common sense growth management.

Local governments probably would not have gained as much reviewing the projects without regional/state input so in that sense it helped, however, the growth happens regardless of how the project is reviewed so I think larger scale development is more likely to be mixed use, integrated and organized that small, piecemeal projects.

It is important to collaborate among the many agencies whether local, regional or state-level in order to best use those most expert in fields that have knowledge of potential issues that result in large developments affecting multi-jurisdictional levels. Not only sharing knowledge, but sharing data is key to a better outcome and access to resources at all levels.

A DRI in itself is sprawl, but the way they are created and guidelines they have to follow has helped keep them from ruining everything.

DRI's do not truly control sprawl. What they do is control the impacts of a proposed development. If the proposal can reduce the significant impacts from the development, then the DRI and development move forward.

DRI's provide the best mechanism to coordinate the extra jurisdictional impacts of large developments that not only control sprawl but allow for regional solutions to large developments.

It is good to have a coordinated plan to develop. However, these DRI seem to pop up in areas that we not as developed.
Q2 What should be done with Florida's DRI process?

Answered: 269  Skipped: 7

<table>
<thead>
<tr>
<th>Answer Choices</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Retain it as is</td>
<td>29.74% 80</td>
</tr>
<tr>
<td>Abolish it outright</td>
<td>13.75% 37</td>
</tr>
<tr>
<td>Refine it (please include any recommendations in the box below)</td>
<td>56.51% 152</td>
</tr>
<tr>
<td>Total</td>
<td>269</td>
</tr>
</tbody>
</table>

### Please elaborate if desired.

1. It should be restored to what it was when first implemented, and given the support in manpower and enforcement tools to ensure that large developments do not take place in fragile habitats.

2. Even though this is politically unpopular, there has to be some counterebalance to unregulated conversion of agriculture and conservation habitat to subdivisions, especially as some are rural; there is also the issue of enough drinking water for new developments as well as sanitary sewage processing and a storm water utility. The developer merely sells a lot and then leaves all the rest of the environmental costs to society. Shouldn't be that easy.

3. Eliminate areas that are duplicative but examine and retain for transportation and natural resources that truly have extraterritorial consequences. Refine 163 (comp plans) and 186 (SRPPs) FS, to better address these issues. Enhance RPC dispute resolution processes.

4. While deleting DRI is preferable, it is unlikely. The DRI process should begin with a requirement that they be consistent with the Comp Plans of all affected communities, city and county. The DRI should not proceed until that is true. Regional and state agencies should not be pressuring local governments to make changes that are so costly to the local communities.

5. Exempt fewer communities. DRI is important!

6. The process needs to be returned to some of its original intent, and be revised/reformed back into a true tool for Smart Growth, with actual state oversight of large developments that have major environmental or multi-jurisdictional impacts. A few specific recommendations: 1. Abandon the DULA concept - it ignores the reality of multi-jurisdictional and environmental impacts (e.g. western Palm Beach and Miami-Dade counties are highly rural, yet are considered a DULA despite the many Everglades issues that can arise with a western major development proposal). Additionally, it makes no sense for municipalities to be exempt when they may easily have multi-jurisdictional impacts on adjacent jurisdictions from a major development proposal. 2. Eliminate many of the project specific exemptions from DRI reviews, especially for development types that do not have an alternative state review process. There is little public policy reason for allowing major expansions to facilities like Daytona Speedway to not undergo DRI review if such an expansion will have multi-jurisdictional or significant natural resource impacts. The binding letter process could be amended to provide a legal determination of whether such types of development will result in multi-jurisdictional or sensitive environmental impacts. 3 - Allow citizen standing to challenge DRIs.

7. The DRI process cannot be abolished outright without dealing with vesting issues for existing DRIs. It would be grossly unfair to completely pull the rug out from under existing DRI's that have spent substantial sums in complying with the DRI regulations and in providing offsite infrastructure that non-DRI projects were not required to provide. To the extent that DRI are vested for specific development programs, those development programs must be allowed to proceed without additional financial burdens, even if nearby projects cause infrastructure capacities to decrease.

8. DRI approval processes should be strengthened, and issued concurrent with development. DRI's should have 5-year sunset if development not substantively underway by that date.

9. Should be preserved and decisionmaking returned to regional planning councils with state appeals oversight.

10. Strengthen RPC and WMD role.

11. The past legislation that created "Dense" urban land areas is seriously flawed. No DRI review is needed in truly dense areas, but most of the "dense" areas in the statute are less than one unit per acre. At 5,000 to 10,000 people per square mile, it makes sense, but the current legislation is laughable. The DRI process is valuable, especially as it measures impacts that cross jurisdictional boundaries. Development in Florida is much better on a myriad of fronts because of the DRI process.

6 / 36
Science-based environmental consultants (not those paid by development interests) should be fully engaged to help us prevent the further degradation of Florida’s land, water, and wildlife.

Require DRI review for large-scale projects in rural and suburban areas, but exempt urban areas where we should be guiding growth by reducing regulatory burdens.

Make it more rigorous.

Require regional planning agencies, and other parties with review and oversight responsibilities, to review DRI requests thoroughly – and not in a superficial or expedited manner.

Give communities, especially rural communities, that are affected by the development more input into the process.

Provide more power to state oversight not less.

Make it mandatory, however, include severe limitations on density and mandatory public transit linkages.

Require an approved DRI not be allowed to be changed for a certain period of time - DRI's get approved and then they come back shortly thereafter to revise the project substantively or gradually over time... after approved very difficult not allow changes...

DRI's provide for the necessary level of review from a regional perspective to prevent exceeding road capacity on the surrounding road system, avoid flooding, ensure adequate affordable housing and protect critical water and land resources.

Based on feedback from the development community, it appears that the DRI review process may be too time consuming. Perhaps refining/shortening review periods may assist with this issue.

There should be some flexibility for new ideas but we must ensure that the Public interest is not skirted for the developers needs. Some developers have very good ideas that should be allowed even if they are not customary.

All DRIs should be required to follow the LEED for Neighborhood Development certification process.

Provide incentives for redevelopment in more urban areas.

Needs to be stronger.

If a proposed DRI is located outside of locally and Regionally agreed upon Urban Growth boundaries, them it should be denied. Period. Cluster development and preserve environmental areas use the McHarg method of land planning. Limit growth per water supply availability. The state should adopt rules requiring sanitary sewer systems for all development of a certain suburban density, say 0.5 unit per acre. Outlaw septic systems. Follow best practices from around the world in developing new policy. Allow for much higher levels of citizen input. Apply smart growth principles.

More consistent throughout state. More difficult to change once implemented.

Provide adequate funding and competent planning legal staff to provide thorough and cognizant regional analysis.

I am not opposed to reviewing the existing DRI process for possible improvement. I am opposed to gutting it, under the guise of (+/-) administrative simplification.

DRI's should be limited to 10 year proposals. Master plans or sector plans could show further concepts, but should not lock in development rights. Should not be included in a CDD and should not limit the application of new codes/statutes. We have lost sight of public goods, so many of the neighborhoods are gated, with private community parks rather than public parks. The DRI's have been a method of getting roads/parks and other amenities built, but the residents are burdened with CDD costs, which make them less likely to support public facilities and are generally a hidden housing cost. Wonderful public spaces like Golden Gate Park do not exist in the land of DRI's. And people rather than believing they a part of a City, think of themselves only as part of this one developer's community.

Protect water supply as to degradation AND quantity in water bodies.

Reduce exemptions and draw up criteria for exemptions.

There needs to be better performance-based measures available that include more of a cost/benefit analysis to the local government and residents. Too many jurisdictions simply allow the development to occur because others will pay for the expense, without considering impacts to the community long term. For example, too often transportation modeling focuses on automobile trip supply availability. The state should adopt rules requiring sanitary sewer systems for all development of a certain suburban density, say 0.5 unit per acre. Outlaw septic systems. Follow best practices from around the world in developing new policy. Allow for much higher levels of citizen input. Apply smart growth principles.

Being in a small community we have only seen two DRI's in my 16 years. Each was minor with both eventually going away. I just personally believe that all bureaucratic functions can benefit from review and refinement.

Having a multi-agency review and a more robust process is helpful in the context of DRI's, however it enables development in areas that are not ready for growth.

I am not an expert enough to give you specific recommendations for change.

There should be more emphasis on available and future water supply. Growing local supplies and year round conservation should be mandatory along with reuse.

The threshold concept was a simplistic means for developers and local government (and the State) to decide whether to jump thus particular hoops and mitigate outcomes. Triggers are still required, but the "margin" (for housing and traffic) should be re-evaluated and include other factors. DRIs may have to serve as planning in lieu of the constraints imposed on planning in 2011

Reinstate some of the former authority.

Place incentives for urban infill and redevelopment, burden greenfield developments with the associated infrastructure costs, place barriers to auto-centric development forms.

Provide for greater state review, beyond that pertaining to "important state resources".

Retain the framework as is and focus on educating the local government staff, perhaps through the Regional Councils, about the "best implementation practices" needed to execute the development orders.
Again, we need state review, bring back QCA, stop calling it DIO, IT IS A FARCE, Bring back impact fees, bring back set dates once or twice a year for applicants. Do not inundate citizens with applications that can be heard any time. No tag along applications. Have the review process well advertised, include public input especially those impacted the most with proposed development. Rules need to be uniform for every county, guidelines standardized. Thank you 1000 friends of Florida.

When the conditions inducing development change such that no activity occurs for some period of time, say a proposed major road project is abandoned and no development activity occurs for 10 years just an example, or new information/analysis becomes available indicating some development conditions are no longer advisable (for instance better, more reliable models of sea level rise), then a DRI conditions should be re-examined. Approved densities should not necessarily stand for 30 years if nothing at all has begun after 10.

Require a more robust bicycle and pedestrian oriented multi-modal transportation system for all development approved through DRI process.

Due to the economy, the previous reforms where never truly tested. With the recent upswing, we may now get a chance to see if the previous changes will work, or if they will result in excessive loss of control.

Due to the economy, the previous reforms where never truly tested. With the recent upswing, we may now get a chance to see if the previous changes will work, or if they will result in excessive loss of control.

Review concurrency rules to ensure adequate public facilities will be available.

Process is to political. Don’t know how you fix that.

The best value that comes from the DRI review is its ability to pull all agencies with jurisdiction together to conduct a cooperative review of development proposals. This can avoid fragmented and narrow vision reviews and shorten the permitting review times and costs to the applicants. State agency review criteria should be amended to reflect this. For example, a DRI affecting the floodplain of a regional drainageway now may get input from the water management district that’s limited to the DRI’s footprint rather than looking at the greater effect on the floodplain. And the WMD is limited in considering land use issues in its review. The DRI can combine all of these concerns into a comprehensive review that should influence how the other permittees act on their decisions and conditions of approval.

I think as a planning process, it is a good idea and most the part I think it has benefitted local governments because it causes a wide variety of issues to be examined. Unfortunately the Regional Councils and then local governments only focus on the issues of the day and failed to really look at the long term impacts. Unfortunately, local governments in general have to focus on immediate issues because they are so close to citizens. State Governments (QCA) may have looked at the long term but didn’t understand local issues and the importance of development to the local economy. Their focus was on academic issues that are not important local issues. I would require all State employees involved in regulation of local development activities to have a minimum of 5 years of local government experience in the trenches before letting them get involved in state regulation. I think this is true for all regulatory issues land use, water, wildlife, etc.

Restore some of the fiscal neutrality review requirements and reasonable impact mitigation requirements that protect Florida’s environment and existing residents.

Correct to as previously established

Actually it should be strengthened, not weakened or “refined.”

I am really unsure about this answer. It seems that the DRI process has moved away from the original intent to deal with the multi-jurisdictional spill over effects of larger projects. If the process can be re-focused on this aspect, then maybe that is the direction the DRI should take. Otherwise, it just appears to be an expensive review hurdle.

Clarifications are needed in new statutes defining changes in approved DRIs, especially procedural issues regarding substantial deviations and Notices of Proposed Changes.

bring back development review that has been

Make it much stricter.

DRI’s have become a game of consultants and attorneys that only increase the cost of development without actually addressing the real cost of infrastructure.

Could be in favor of abolishing it with some refinement but it abolish or refine, need to deal with: 1. really only thing deals with is traffic and affordable housing. Some would claim deals with natural resources but has not really been experience. Comp plan controls there, as it should. Extra jurisdictional traffic is a myth because while calculations will be made outside local granting approval, always fixed are performed in that local because get impact or concurrency credits there. Finally, DRI affordable housing is literally a joke so we should go to comp plan there. 2. If keep, streamline both ADA and the timeline so one could be done in 10 months. Currently, it is assumed you are talking about 18 months at a minimum and slightly under a million dollars to do studies on a smallish project. Then, when you are done, the M&M kicks in making future cost totally unpredictable. 3. RPCs all over the place in skills, funding. Way too expensive to fund them to hire folks to question your experts. At same time, FDOT (which does hire consultants) is also questioning information. It is just a very cumbersome process with too many costs and layers. And, one still haven’t gotten local approval or any state or federal approvals on environmental, etc.

Simply process for modifications (NOPC).

Make the loopholes less attainable and put REAL deadlines on some of these projects. Make major changes (impacts on schools, roads, amenities, etc.) have to go back to the respective Commissions. Some of these take years to do and ideology changes.

The process needs to support projects that help create both temporary and permanent employment.

It prolongs the process and adds costs that are not recouped even in non-monetary aspects such as environmental protection, enhancement of public services, conservation, quality development, etc. The processes and mechanisms effectuate beneficial and sustainable development are already in place, in some instances to an extreme.

More advertising about what it does

The intergovernmental coordination required in the DRI process is of great importance to both developers and governmental agencies. It makes no sense to get rid of it. DRI is already almost meaningless in the majority of the state, with the ridiculous and inappropriately named “DULAd”. The “brand” is fatally compromised. So call it something new that makes Republicans happy, but keep the requirement to get everyone in the same room and work it out.

Tighten up the annual reporting and local jurisdictional responses and make a priority of DIO review.

6/23/2014 1:17 PM
Florida's Development of Regional Impact (DRI) Process

68 The development industry desires "flexibility" on their part, but rigidity on the part of the governments involved. An example is the DRI that may "stall" while the rest of the community does not, this is especially an issue when projects proposed exceed entitlements but do not ever approach them, underbuilding their projects - this does have effects on the concurrence of service as governments must "plan for the max entitlement" but there is not obligation on that developer - or subsequent owners - to follow through. Add in the tendency to "delay" payment of a proportionate share contribution until a development phase that is smaller than originally claimed is actually proposed it makes it difficult for all government agencies to actually plan for that project. Government is typically willing to commit - time, resources, and money, but development desires to have no commitment at all - it is a two-way street.

69 Respond to a demand rather than try to create the demand. Make water supply an essential part of the process, bypassing a consumptive use permit from the water districts. Set policy in Tallahassee that guides local process.

70 This is an outdated regulatory process that was set up before there were mandates for local government comprehensive plans in Florida. It is duplicative of other local and regional permitting processes through local governments, water management districts, DEP, the Army Corp, etc. They additional burdens of the process result in development proposals that stay under thresholds and therefore result in the exact opposite of what was intended. It is unnecessary and there is disparity of how it is applied throughout Florida, thus resulting in second class class entities. It is not exempt and thus not attractive for responsible growth opportunities. It is totally broken.

71 Provide incentives for real sustainability - conservation and restoration, renewable energy, documented reduction in external transportation impacts.

72 Re-assess the notion of impact on natural resources and the quality of life for existing residents? And while you are at it, do the research. Exactly what is the connection(s) between the applicant and the guys who decide yes or no?

73 It seems only to be needed in small Counties or communities without a full planning staff. For much of the state it is not needed.

74 There are many other communities, besides those currently exempt, which do not need the oversight of an RPC or the DEO in order to review and approve development.

75 The true regional topic of discussion is transportation and that can and is already handled via interlocal agreements. DRIs give some Regional Planning Councils more work to do at the cost of the taxpayer, which has yet to justify re-designing projects at the block level. Regional planning councils are pertinent to the smaller, rural counties.

76 To the extent that very large DRIs are an issue for multiple governments and/or for environmental or infrastructural systems that impact multiple governments, yes, the DRI process makes sense in some form. We ought to consider the difference between DRIs in urban countereas and those in rural, really, some urban areas have little significant environmental resources and the DRI ends up being about transportation impacts as well as livability/walkability. Let's consider a tiered approach for urban and non urban NEW DRIs. Then there are the existing DRIs; if the DRI is for instance half built out, let the local government and the applicable MPO and RPC handle the rest of the phases for any NOPCs etc. Other agencies might comment if asked but let the process be a bit simpler and local focused.

77 We needed continued regional coordination on major projects. Perhaps this can be accomplished with less "hoops" to jump through or for people to just get around.

78 Require more timely infrastructure provision; Require passing effective test and assurance that the new development will not simply drain demand and maintenance from currently developed areas.

79 DRI's should really attempt to be as self-sufficient as possible - at least in satisfying shopping, school, recreation and other potentials local trips. Connectivity should be required to promote alternative modes.

80 New development should only be occurring within established urban service areas with hard boundaries. Given that, the Comp Plan and it's processes should be able to handle mitigation of impacts.

81 The DRI process should put more emphasis on ensuring the environmental, infrastructural, and energy needs of a development do not cause serious negative impacts.

82 Make it stronger. Go back to requiring infrastructure to be in place prior to approval. Protect our natural resources (springs, rivers).

83 The process should focus solely on projects that create extra-jurisdictional impacts. All other projects should be exempt.

84 The size and scope of government has reached beyond the threshold of sustainability; long lost is benefit of providing for the general welfare for our society. The only beneficiaries of the DRI process are those financially invested in perpetuating government revenue stream and its adjoining tentacles.

85 The recent exemptions from DRI process made no sense. It was not the barrier to new real estate development opportunities. In Florida there were /are many factors that influence opportunity and demand. With out DRI's the impacts from (particularly) large developments are felt throughout a broad community. Impact fee waivers + DRI exemptions leave the general public paying for the lion's share of additional construction and service burdens. DRI's are not perfect but are the best way so far that Florida has tried to equitably focus on the costs of development impacts. Some of the thresholds for DRIs were already low and parties, including municipalities, were avoiding DRIs. The shifting of impact burdens to the public is a problem in our communities.

86 We need to have a comprehensive, strengthened DRI process statewide with effective checks and balances. They need to include consideration of impacts of climate change and resource capacity especially in regard to water.

87 expand the jurisdiction of the process.

88 Refine it (i.e., at least keep it on the books so that a core legal reference will be there when the time comes to use it as a broader response again). By refine, what I mean is to "functionalize" it [e.g., to narrow its focus to the most critical regional denominators (i.e., functions/shared) like water, major transportation activities, a filter by which to slow costly sprawl, etc.].

89 expedite, strengthen, provide more teeth.

90 Since Florida's DCA has been abolished, the DRI process should be strengthened.
91  Insure that all of Florida's legal residents, voters, and taxpayers are given actual public notice (via mandatory television news coverage and US mail) of all proposed developments of regional impact in their county and region. Give Florida's citizens a right to public input on proposed DRIs, through well publicized notices of public hearings and workshops on said proposed DRIs. Give Florida's voters a legal right to OPPOSE and DENY permits for developments of regional impact that would negatively affect their present quality of life, sustaining natural resources (aquifer, water quality, water supply, taxes, roadways, infrastructure, existing natural areas and native wildlife, etc.) Florida's legislature and legislation appears to presently be "by and for the corporation," and no longer representing the best interests of existing Florida residents, taxpayers, and voters. Voters feel powerless to question or oppose the rampant development and urban sprawl that is devouring our State, its fresh waters, native habitats, natural resources, and wildlife. Our State presently appears to be ON SALE to the highest (or best connected) bidder, with NO thought to the future sustainability of the land and waters on which we (and Florida's wildlife) depend. The DRI process should be PUBLIC, Transparent, and meaningful. It should give citizens/voters a voice in the process as "stakeholders," with legal ability to deny, or demand changes to proposed DRIs or elements thereof which would threaten natural resources, quality of life, economy, or sustainability of affected neighborhoods, municipalities, counties, or regions.

6/18/2014 10:24 AM

92  Difficult to turn the tide on the push to reform, but what reform would be helpful needs to be carefully considered with an eye to balancing the factors if we want to maintain a sustainable state with sustainable growth factors have to be balanced and a big picture higher level view taken - including for large developments

6/18/2014 2:18 PM

93  Keep it only for very large projects. You really need to fully fund the regional planning councils if you are serious about it. Small cities and counties need more staff (or better regional staff) if they want to continue with DRI and amending existing ones since there are so many DRIs out there - we can't get rid of it.

6/18/2014 1:31 PM

94  There needs to be some oversight outside of the local jurisdiction for regional projects. Regional planning criteria under some other name may be more beneficial. Have to think about how this is structured.

6/18/2014 1:28 PM

95  As it currently is enforced there is little benefit from it. The DRI process was envisioned prior to the Comprehensive planning process. Currently it is more redundant and cumbersome than effective.

6/18/2014 1:20 PM

96  Developers should be held to the agreements that they originally agree to.

6/18/2014 12:20 PM

97  Smaller thresholds and shorter expiration dates are needed.

6/18/2014 12:13 PM

98  I think we really need to look at greenfield vs redevelopment DRIs differently. Urban areas like downtowns need to have a different set of rules - i.e. Stormwater - we do not want ponds in downtowns; removing direct discharges could be mitigation instead or adding sea grass beds, etc. Transportation - we do not want larger roads in downtowns so instead transit availability and service times, bike lanes, expanded sidewalks should be used as concurrency. Air Quality - dust control downtown is covering buildings in mesh vs large sites keep soil undisturbed or water down dust.

6/18/2014 11:49 AM

99  Change the review criteria to include requirements more directly related to the local comprehensive plan. The should probably also happen with the sector plans also; they are a DRI under a different name. We also need a careful review of the results of the DRI process; I would love to see an unbiased assessment of the results of our land development regulations; something like ELMS that is truly non-partisan is needed.

6/18/2014 11:48 AM

100  1. To be viable, we all need to recognize that there needs to be enforcement. Historically, this has been one of the great unsung weaknesses of the process. Annual reports need to be reviewed and checked. It is my observation, th at, after a few years, no one pays much attention to the local government who may not care, or remember, what the development order was supposed to do. 2. Part of the role of the State (DEO) should be to ensure the correct implementation of the statute and F.A.C. One of the main reasons that the DRI process became so unpopular is that the RPC's seemed to believe that all impacts were regional or that the DRI process was an opportunity to experiment with planning theory. The State should be an advocate for the process vs. a no growth agency. 3. There needs to be clarification on what is regional and what is not. 4. Environmental groups should not be given agency status. The Sierra Club and Friends of the Banded Grasshopper should not be given the same review powers as FDEP or FDOT. Such groups have a clear "stop everything" agenda.

6/18/2014 11:33 AM

101  The biggest problem

6/18/2014 11:25 AM

102  The changes to the DRI process that have already been adopted in recent years has created an unequal playing field, and limited the effectiveness of the DRI process. We should revitalize the DRI process by reevaluating the exemptions from the process, reestablishing a state land planning agency, and rethinking the right of RPCs to appeal development orders. The rationale given for exempting some local governments from the DRI process entirely (DULAs) had some merit, but the results have created an unequal playing field. Developers that want to avoid the increased level of scrutiny (and costs) associated with the DRI process can now choose to develop in an area that is exempted from DRI review. The impact of this is that counties that are still subject to DRI reviews (with their associated costs) have more difficulty attracting potential development, resulting in a negative economic impact on these counties. This past session, Galvano's proposed DRI bill would have aggravated this inequity by increasing the number of cities and counties that are exempted from DRI review. As development ramps up in Florida, we will not have the safeguards put in place by the growth management legislation of the 70s and 80s. We have eliminated the DCA, the state agency responsible for overseeing growth management, and we abandoned many formerly required elements of comprehensive planning in Florida, along with their associated levels of service requirements.

6/18/2014 11:10 AM

103  Might even consider strengthening. I understand it has been weakened repeatedly over the last 10 years.

6/18/2014 11:02 AM

104  Add incentives for those doing projects that meet certain criteria for non-sprawl development, or for economic development projects. These could include elimination from DRIs or a faster, less costly process. Non-urban sprawl development could have to undertake a more arduous process and provide mitigation for energy use by automobiles. Like that's going to happen!

6/18/2014 10:58 AM

105  Make it stronger.

6/18/2014 10:57 AM

106  Include stronger considerations for water supply

6/18/2014 10:56 AM

107  See above. Also the methods for calculating impacts could be simplified. More generally, I would like to see local governments encouraged to hire great planners, today's John Nolans, to do area wide DRIs, the equivalents of Nolan's plans for the long term growth of Sarasota, Naples, etc. This proactive planning could relieve property owners of the burden of entitlements, which have become a risky and expensive crap shoot.

6/18/2014 10:43 AM

108  Eliminate "Regional Planning Council" reviews; said agencies are as useless as tea sets on a boar and only serve as a taxpayer drain and employment source for those who couldn't hold a job elsewhere. Force more state level review in an adversarial setting.

6/18/2014 10:42 AM

109  Need to shift from the process intensive focus to one that puts emphasis on outcomes.

6/18/2014 10:40 AM

110  The DRI process was created in 1972 at a time when there was no local comprehensive planning process. Now there is. Even though its on life support, local governments through the planning process and capable and have the tools to plan and regulate large developments. Small counties could use help, but large counties don't need the help.

6/18/2014 10:24 AM
| 111 | It should be strengthened. The exemptions that have been introduced over recent years should be removed. Large projects affect the surrounding counties and cities; their resources and infrastructure are impacted, and they should be part of the process. | 6/18/2014 10:23 AM |
| 112 | be clear of reviewing/monitoring/enforcing development order conditions roles and authorities. | 6/18/2014 10:22 AM |
| 113 | Retain it but remove the exemptions; return the DRI requirement for mines, marinas | 6/18/2014 10:17 AM |
| 114 | It'd be ideal if there was some way to keep developers from just buying the political approvals their projects need. Since that'll never happen, the very least Florida could do is strengthen and mandate a DRI process. | 6/18/2014 10:17 AM |
| 115 | Regional project should receive regional review! | 6/18/2014 10:13 AM |
| 116 | The size of development subject to the DRI process should be reduced. An economic analysis should be required to show both the expected revenues and costs associated with the development. Anyone in a governmental agency that could possibly benefit in any way from the approval of the DRI should not be allowed to participate or vote in the DRI process. Impacts to the existing population, infrastructure, resources, LOS, should have priority over any "new", potential benefits. Once approved, any change to the development that was approved as being part of the DRI, should reopen the DRI process and be subject to the same scrutiny and oversight. | 6/18/2014 10:12 AM |
| 117 | Unsure what to do. The legislature seems to want to carry on the tradition of embracing every way to commercialize Florida. If the process is retained, it's the continuation of an ineffective method of resource protection and sprawl control. If it is abolished, then it's an open door for all carpetbaggers and scalawags that want to do business in the state. | 6/18/2014 10:12 AM |
| 118 | The current process is difficult to enforce. There needs to be tools in place that ensure accountability, while at the same time allowing for flexibility as the needs of the community and region change. | 6/18/2014 9:51 AM |
| 119 | Details details details. Specificity. | 6/18/2014 9:44 AM |
| 120 | It should be oriented more towards getting better planned development, rather than as a means of justifying huge sprawling developments by mitigating impacts and financial commitments. The DRI numerical thresholds are somewhat arbitrarily quantitative - DRIs need a qualitative threshold. We need better developments, not just more and bigger. | 6/18/2014 9:42 AM |
| 121 | Need to look at the current process to see if it can be improved. | 6/18/2014 9:40 AM |
| 122 | It needs to be strengthened to ensure that the regional impacts of a project are fully evaluated. | 6/18/2014 9:38 AM |
| 123 | Continue with Sector Planning as an effective means to address large landholdings over a longer period of phased development. I've completed DRI's on the private side and have been a reviewer on the public side. The process itself doesn't do anything to curb sprawl or result in more sustainable design outcomes. | 6/18/2014 9:38 AM |
| 124 | No matter what they do to it, it's the same process with a different name. They've been doing this since the 1980's when I started my career in planning in FL. I think any help with large scale projects is good for local government especially when a project crosses municipal boundaries. | 6/18/2014 9:25 AM |
| 125 | Exempting a Dense Urban Land Area (DULA) from the DRI process caused at least one (to my knowledge) DRI to withdraw after the DULA exemption was established. In my opinion, this was unfortunate as subsequently the applicant chose to use the local development order process. Not all local governments have the expertise in transportation, environmental, biological habitat of flora and fauna, etc. without contracting out those services. In addition, the surrounding jurisdictions, certainly to be effected by the development, were no longer in the "loop" on the process. | 6/18/2014 9:21 AM |
| 126 | Require measures to address climate change in coastal communities. Require job creation metrics that must be met over so many years. | 6/18/2014 9:20 AM |
| 127 | The DRI process should include more stringent requirements to better control the type of development, location of the development, and impacts the development will cause. | 6/18/2014 9:19 AM |
| 128 | Make the process a mandatory coordination process to make sure impacts of large developments on adjacent and affected local governments are dealt with. | 6/18/2014 9:08 AM |
| 129 | Encourage development in areas already very developed. Near areas where there is already transportation. Encourage use of keeping green space and character of the area. Not making the area an eyesore. | 6/17/2014 1:29 PM |
Florida's Development of Regional Impact (DRI) Process

Q3 Do you believe that the administrative rules still in existence for DRIs (73C-40) duplicate or complement other state or federal permit programs?

Answer Choices

<table>
<thead>
<tr>
<th>Responses</th>
<th>Answers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Duplicate</td>
<td>18.18%</td>
</tr>
<tr>
<td>Complement</td>
<td>43.48%</td>
</tr>
<tr>
<td>Unsure</td>
<td>38.34%</td>
</tr>
</tbody>
</table>

Total 253

# Please elaborate if desired.

1. The DRI process is the only process that looks at Natural Resources from an ecosystem point of view.
   Date: 7/15/2014 10:52 AM

2. These are a planning process set of rules, not regulatory permitting rules. The "Safe Harbor" criteria rules need to be reviewed to see if they should be expanded to address other resource and infrastructure issues (e.g. climate change/sea level rise).
   Date: 7/14/2014 9:05 PM

3. I think the DRI process is duplicative of many existing rules, and creates new, more burdensome requirements that often penalize the DRI developer competitively.
   Date: 7/14/2014 6:59 PM

4. As a native Floridian, I'm not interested in "streamlining" the process but rather in making sure that all voices are heard so that the right decisions can be made for our future generations...if Florida is to have a future.
   Date: 7/14/2014 3:39 PM

5. In many instances complement locally. Unsure all statewide.
   Date: 7/14/2014 2:02 PM

6. NO
   Date: 7/14/2014 1:10 PM

7. IN LARGE PART THEY ARE NOT SIMILAR IN THE "EVALUATION" PROCESS.
   Date: 7/14/2014 12:46 PM

8. Without reviewing the rules, I do not feel competent to comment.
   Date: 7/11/2014 12:58 PM

9. Public needs to be better informed on how procedure works and what their options or recourse is.
   Date: 6/30/2014 10:11 PM

10. If anything, they ensure that the other rules are at least looked at.
    Date: 6/30/2014 11:44 AM

11. Recent legislation over the last 5 years has muddied everything to the point of being silly.
    Date: 6/30/2014 7:33 AM

12. The rules can be duplicative if the DRI review focuses on the same details that other programs cover, but can also be a very important check on those programs to be sure that things aren't getting missed. Since the DRI review is more comprehensive in scope than most permitting reviews, its results should be allowed to guide the permitting reviews and not the other way around.
    Date: 6/29/2014 4:53 PM

13. however need to be more comprehensive as previously established
    Date: 6/27/2014 1:35 PM

14. The DRI doesn't replace other permit processes, but it may help coordinate content between them.
    Date: 6/27/2014 10:13 AM

15. These rules provide directions for specific project mitigation unlike alot of the other permitting programs.
    Date: 6/24/2014 4:07 PM

16. See prior comments.
    Date: 6/23/2014 2:39 PM

17. They do both duplicate and compliment - for a project that truly proceeds, it lets a development pre-address its issues and allows it to move forward and easily "flow". For one that flounders, it is an issue as the advance studies, etc. become outdated. Again it is the issue that development wants flexibility (mostly in timeframes and buildouts) but wants government to remain "fixed in time" - all the advance studies change - and government can't set something in place to "fix it in time" unless the developer provides the resources and/or funding to assist the government. Traffic and wildlife studies are examples.
    Date: 6/21/2014 8:29 PM

18. Is this question intended to weaken the DRI process? If duplication exists then eliminate it, prioritizing home rule under state guidelines.
    Date: 6/20/2014 9:36 PM

19. The administrative rules for DRIs in every respect duplicate other local, regional, state and federal permit programs. There would be no protections lost by eliminating the subject rules.
    Date: 6/20/2014 2:00 PM

Please elaborate if desired.
<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>20</td>
<td>Some duplication could be removed.</td>
</tr>
<tr>
<td>21</td>
<td>There is legislation that speaks to the avoidance of duplication.</td>
</tr>
<tr>
<td>22</td>
<td>Never heard of 73C-40. I'm familiar with the old 28-24 for thresholds but this is new to me and I've processed a lot of DRI's in my time!</td>
</tr>
<tr>
<td>24</td>
<td>I am not privy to present administrative rules, but based on DRIs being permitted, the permitting process lacks meaningful State and Federal oversight that would protect the interests of citizens and state natural resources. There are DRIs presently permitted that clearly negatively affect fresh water resources, and critical habitat for listed species, and that lack infrastructure concurrency. SWFWMD, DEP, US FWS, and even DOT and Army Corps of Engineers SHOULD have denied several DRIs in our area (the Nature Coast) that clearly negatively impacted the resources those agencies are entrusted by the Public to protect.</td>
</tr>
<tr>
<td>25</td>
<td>I have not closely followed the rule making on this topic but I am concerned about the withdrawal of a meaningful state review of large-scale projects especially when local governments don’t have the capacity to review these types of projects. One other real advantage of DRIs is that they implicitly recognized that some projects have regional, but not necessarily statewide significance. This lack of true regional review and governance when the state is withdrawing from governance is a significant issue.</td>
</tr>
<tr>
<td>26</td>
<td>The process has strong similarities to a major plan amendment.</td>
</tr>
<tr>
<td>27</td>
<td>Because of the time and process required to amend administrative rules, some of them can be so out of date that they not only duplicate but conflict with statutes and most likely many other state or federal permit programs.</td>
</tr>
<tr>
<td>28</td>
<td>Neither. Too many permit reviews are conducted by panels whose only concern is whether the panel is conforming to the rules rather than whether the applicant is conforming to the rules. DEP is the worst offender in this regard.</td>
</tr>
<tr>
<td>29</td>
<td>The only thing the DRI rules give us is endangered plant protection and some lip service given to affordable housing. I have seen nothing beneficial coming from the rules.</td>
</tr>
<tr>
<td>30</td>
<td>However local enforcement and implementation needs significant HELP! Most DRI analysis and reports (except transportation) get put on a shelf and is never looked at again once the DRI DO is issued.</td>
</tr>
<tr>
<td>31</td>
<td>I haven’t worked on a DRI in so long, I’m no longer familiar with the rules.</td>
</tr>
</tbody>
</table>
Q4 If Florida's DRI process is eliminated, can local comprehensive plans adequately deal with what otherwise would be DRIs?

Answered: 253  Skipped: 23

<table>
<thead>
<tr>
<th>Answer Choices</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>23.32%</td>
</tr>
<tr>
<td>No</td>
<td>67.98%</td>
</tr>
<tr>
<td>Undecided</td>
<td>8.70%</td>
</tr>
<tr>
<td>Total</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>#</th>
<th>Please elaborate if desired.</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>We need uniform state oversight to ensure compliance and that no local, &quot;good-old-boy&quot; influences sways the decision making process.</td>
<td>7/15/2014 7:53 PM</td>
</tr>
<tr>
<td>2</td>
<td>In several counties, the board of commissioners is strong enough and sophisticated enough to consider the long-range financial and environmental (water) consequences of their development approvals. Most other counties – less populated, less independent in thought – can only see as far as the increase in ad valorem taxes. Even the more sophisticated counties do stupid things, like confer holidays for payment of the severance fees that fund water, sewer, and school infrastructure.</td>
<td>7/15/2014 2:19 PM</td>
</tr>
<tr>
<td>3</td>
<td>If SRPPs are revised to address cross acceptance.</td>
<td>7/15/2014 10:52 AM</td>
</tr>
<tr>
<td>4</td>
<td>The Comp Plans can deal with the projects although many do not. The DCA should be re-instituted with one goal of the DCA to work with local communities on how to fully analyze the costs of these DRIs and how to prevent the burden of that cost fall on taxpayers.</td>
<td>7/15/2014 9:26 AM</td>
</tr>
<tr>
<td>5</td>
<td>Larger cities, particularly ones with multiple DRIs, would have comprehensive plans that adequately deal with them. Smaller cities that lack any DRIs, or just one or two, would more than likely have insufficient comprehensive plans, though it is possible. Therefore, a DRI process, in any form, should be maintained.</td>
<td>7/14/2014 8:04 PM</td>
</tr>
<tr>
<td>6</td>
<td>The biggest problem is how to create financial equity between DRI projects and non-DRI projects. There needs to be a method for providing impact fee credits or other forms of reimbursement when developers are required to construct roads in neighboring jurisdictions that relieve the developers in that jurisdiction from having to construct those roads. Until there is some form of credit/reimbursement mechanism for mitigating impacts in other jurisdictions, the DRI process will not be able to equitably address multi-jurisdictional impacts. Coordinated comprehensive plans between adjoining jurisdictions would be a step in the right direction, but local governments do not seem willing to engage in multi-jurisdictional planning if it means spending tax dollars to reimburse private developers in another jurisdiction for contributions the developers make across jurisdictional boundaries.</td>
<td>7/14/2014 6:59 PM</td>
</tr>
<tr>
<td>7</td>
<td>Some local governments can, but most do not have the political independence and/or planning expertise to do so.</td>
<td>7/14/2014 5:21 PM</td>
</tr>
<tr>
<td>8</td>
<td>That would return Florida to the period when impacts of development approved by one jurisdiction could significantly impact others without adequate checks and balance.</td>
<td>7/14/2014 4:55 PM</td>
</tr>
<tr>
<td>9</td>
<td>Probably not because we can see that a few wealthy developers have enormous power to get what they want, even when that is clearly detrimental to Florida residents. Concurrence, for example, is in an induced coma because county commissions are comprised of developers or &quot;friends&quot; of developers who believe that we taxpayers need to supply funds for them to undermine our own property values.</td>
<td>7/14/2014 3:39 PM</td>
</tr>
<tr>
<td>10</td>
<td>Extra-jurisdictional impacts will not be addressed.</td>
<td>7/14/2014 3:25 PM</td>
</tr>
<tr>
<td>11</td>
<td>Large, urban jurisdictions have sophisticated comp plans that can handle the impacts of large-scale developments, but many smaller and rural jurisdictions should have the backdrop of the DRI process to review and consider land use impacts of DRI-level projects.</td>
<td>7/14/2014 2:33 PM</td>
</tr>
<tr>
<td>12</td>
<td>In the larger wealthy counties and cities. Not sure about smaller population rural counties and cities.</td>
<td>7/14/2014 2:02 PM</td>
</tr>
<tr>
<td>13</td>
<td>Local comprehensive plans need overseer from a group that cannot be impacted or influenced by those seeking the DRI. DCA was such a group and should be reinstated.</td>
<td>7/14/2014 1:21 PM</td>
</tr>
</tbody>
</table>
Locals get too much political pressure from developers. Particularly when a project has multi-jurisdictional impacts. The intergovernmental coordination part of local plans is always the last part to get attention. Will always be, politics and politicians. Only if the legislature mandates that Comp Plans must be strengthened to require appropriate review. Unfortunately, there is, and will always be, politics and politicians. The local comprehensive plans will focus on infrastructure and impacts solely within their jurisdiction, losing the regional focus of the DRI method. Absolutely not!

Florida’s Development of Regional Impact (DRI) Process

Local comp plans are generally a joke as well. No regional entity exists to coordinate development with the essential abolition of RPC’s. Most local communities do not have the planning expertise or regional perspective to adequately manage growth. The political climate in certain jurisdictions preclude planning staff from proposing regulations that would potentially hinder economic development. The continuance of certain DRI review criteria is critical for safeguarding quality of life issues for many communities. The problem with turning this over to the locals is that the program then becomes much more political and the locals tend to allow more unrestricted development for the sake of economic development. Other than in certain counties, most local governments are not “VISIONARY” enough to deal with impacts in the long term. Communities tend to look after what they perceive to be their best interest. What Community A believes is best for them may be detrimental to adjacent Community B. Leaving it only in local comp plans tends to eliminate the regional perspective.

Local governments are in competition for development and the tax revenue generated by development. If one says no to a DRI, the other may say yes. Developers play one gov against another as part of the game. Comp plans are amended constantly to allow new development without consideration of regional impact and this would be the norm without a DRI process.

Too susceptible to short term & local concerns. It depends on the size of the development and the strength of the local government's comprehensive plan. Local plans most likely will have individualized variations which may or may not be beneficial in establishing new development with limited impacts. Having a state standard appears to be beneficial.

In large metropolitan areas city and county governments have the ability to analyze DRIs. Smaller local governments may not. It's ridiculous to even think this. LOCAL plans by definition don't deal with REGIONAL issues.

Many local Comprehensive Plans do not provide future direction, they only met minimum state requirements. Communities evolve, but DRI's are not designed to evolve. In some cases, the Comp Plan has an amorphous designation such as "Planned Community" which is only described by the DRI/DO. What happens when the 30 years is up. There is a PUD zoning and an expired DO? What is the future direction? Should one expect the DRI to infill further as the area becomes more urbanized. Most current residents resist any change. More so, than the normal Land Use and Zoning amendments in a City.

It's too easy for moneymen to control and overwhelm local governmental agencies. They could only be controlled growth boards of commissioners.

Streamlining the process is certainly a worthy goal. I'm not sure that local governments, especially in rural areas, would have the staff and resources to complete the planning necessary to develop a proper analysis of proposed development.

Local comp plans do not address regional impacts. Last year the legislature tried to gut and retroactively diminish local plans so DRIs need to be strengthened even beyond historic levels.

Local growth management has been gutted to such an extent that I don't think there is sufficient resources to manage large scale development by many local governments.

DRIs are developments that have multi-jurisdictional impacts. The Intergovernmental Coordination Element of the local comprehensive plan does not presently require the adoption of development thresholds that would mandate a regional review process.

All jurisdictions are not staffed or able to think broader than local impacts. Not to mention we are looking more regionally at issues and that is more important that it was 30 years ago.

Local Planning "could" address projects that would be DRIs, but intergovernmental coordination is lacking and far too many local governments in areas where growth will occur have weak plans and no resources to implement them.

Local comprehensive plans deal only with local issues whereas DRI responsibilities are state-wide and are more comprehensive.

If local government is required to put such controls in place.

The local comprehensive plans will focus on infrastructure and impacts solely within their jurisdiction, losing the regional focus of the DRI method.

Absolutely not!!!!!!!!! There is such a range of credentials and staffing in local government that while many may be able to handle major developments, many others are not likely to adequately consider their neighbors.

The local plan policies, staff and resources, especially in small jurisdictions, will not adequately address all the DRI impacts.

Only if the legislature mandates that Comp Plans must be strengthened to require appropriate review. Unfortunately, there is, and will always be, politics and politicians.

The intergovernmental coordination part of local plans is always the last part to get attention. No local government will voluntarily say that they won't approve something if a neighboring government isn't happy with it.

Urban areas yes but in some of the rural areas no.

Most of them wouldn't be allowed without modifying the comprehensive plans.

Particularly when a project has multi-jurisdictional impacts.

If the comp plan is strong and protects the environment and quality of life for local residents.

Locals get too much political pressure from developers.
I think this would take us back to the days where no one looked over the border of their jurisdiction to impacts. As noted earlier, I think we need to narrow the focus of the DRI solely to this aspect.

Local governments do not have the incentive to work with others, and the DRI process is so important to bring all the parties together.

As a former elected official and as a member of a planning and zoning commission for 20 years I can say absolutely that is a rare occurrence when any local body can withstand the onslaught of developer pressure, lobbyists, money, lawyers, threats of lawsuits and campaign contributions. The "local" love to say "... that is for the State to say..."

The intergovernmental coordination requirements of Chapter 163 are very weak.

It would make it extremely difficult for local municipalities to deal with the complex details of a large scale mixed use DRI under Comp plans which are typically streamlined to be vague and flexible.

Entirely different programs with different goals. Like zoning, the DRI process is an implementation method to the Comp Plans.

Absolutely. Local planning departments and local governments are now much more knowledgeable and sophisticated and thus can evaluate proposed projects without the cumbersome and costly DRI process.

If there is a will on part of locals. Can do in most instances if want to. Some don't have a clue but they get equally balled up in DRI's also.

Only if Comp Plan rules were rewritten to incorporate more DRI related specifications. However, where I come from unless current housing and business is down DRI's would never apply.

State funds would be better spent providing resources and support for affected local governmental bodies than requiring them to expend their own funds and other resources participating in regional effort.

Financial incentives at campaign times can impact the impact.

Not likely!

Intergovernmental coordination under the local comp plan cannot address the issues when state, county, regional and neighboring local governments all have a different point of view on regulation, whether it be environmental, transportation, affordable housing or other issues.

The DRI process is a better resource for intergovernmental coordination - and much better than potentially duel ing and competing local governments and their Comp Plans. Relying on Comp Plan and intergovernmental coordination would leave the court system as the resort for disputes (no matter what mediation process you try) which would trap a developer between the disputing governments.

Too many local governments do not exercise adequate consideration for impacts on their neighboring jurisdictions. Anticipated fiscal benefits outweigh potential impacts on adjacent governments.

There must be coordination beyond the local comp plans; otherwise it cannot be called a development of regional impact. If there is impact then it must be coordinated.

Absolutely. The DRI process should have been eliminated once local government comprehensive plans were mandated.

Our commissioners violate their comp plan whenever they please.

Having worked as a planner and with a variety of other planning specialists at local government agencies, all we ever needed was the assurance that we could do --- and keep --- our job.

Through already established interlocal agreements or future interlocal agreements.

I don't think this is a yes or no answer. Again, you should try to differentiate somewhat between rural and urban areas. Comp Plans are much better than they used to be and more localities are typically enforcing them; that said, I'd recommend a strong policy requirement of all Intergovernmental Elements to require that DRI level developments in cities over 25K that are DULAs and urban counties (more than 750K or ?) be vetted by the local city and county governments with required review by the MPO and RPC, plus comments from FDOT where their facility is impacted or DEP where a state waters or other significant state resource is involved. For rural communities I'm not sure it makes sense to make the DRI process much different than it is today... why would we encourage growth in our rural areas when we know that is part of sprawl?

It depends on the comprehensive plan.

No. Comprehensive plans might have had the potential to do this if the 1985 law had been implemented to it's envisioned potential, but plans today are ineffective. Moreover, to the extent that comp plans are currently being amended to delete provisions for protections which purportedly overlap existing local regulations, these regulations may be repealed in the future to provide consistency with the vacuous comprehensive plan.

Provided you have knowledgeable staff. The Legislature has made a joke of the science behind it by passing out build-out extensions like political campaign pamphlets! Given the market's ups and downs it just doesn't make a lot of sense to attempt to vest a development order because they never build out in the original ADA time frames.

What comprehensive plans -hahaha.

Are you kidding?

I have seen firsthand as a local government staff that local governments are unduly influenced by local development pressure.

Absolutely not! Local comp plans would eventually become totally inward focused. E.g., we've seen time and again that the intergovernmental element is considered the LEAST important of the elements, receives less than minimal attention, and is put off until LAST (not first) in the local planning/plan revision process.

Local comp plans are too narrowly focused to prevent or diminish adverse effects of development on adjacent counties or municipalities.
Not just NO, but NO WAY! Government Officials and County / Municipal employees can as easily be as incompetent, uninformed, or corrupt as state and federal ones. We the People should be the meaningful, legal, and legislatively empowered "checks and balances" to both State and Local (municipal / county) DRI and Comprehensive Plan processes. Presently, "We The People" are rarely, if EVER, informed of the DRIs and other commercial and residential developments that affect our lives, quality of life, and rural or regional "character" of the areas in which we live. I can't remember the name of the proposed law that ALMOST made it (or did make it) on the ballot a few years ago, but it would have given WE THE PEOPLE more rights to deny proposed developments that WE THE PEOPLE felt would negatively affect the places where we live, or threaten our present quality of life, and/or the natural resources that sustain us.

They don't consider the intergovernmental factors sufficiently, they take the local view only. Impacts to neighbors are likely ot be overlooked.

Large counties can make up for it, but small counties and cities will not be able to deal with impacts. Developers will simply bully the people into paying for roads, sewer, water and stormwater and schools for their new developments. You can also lose affordable units goodbye.

Land development is a local issue. Florida's regulatory oversight has become significantly more effective since the DRI process was established.

From what I can tell, the state rules have been written to remove the potential for enforcement of local initiatives and programs to protect environmentally sensitive features.

In some places the local government probably can address the review but I am not of the opinion that that the state will hold back in the face of local requirements on projects that are proposed on property owned by powerful political friends of our governor or other legislators. While the gutting of growth management was sold as a means to increase local control, many actions have been taken to limit local autonomy.

Not with the reductions that have been established in enforcing local elements of comprehensive plans, i.e. restrictions on wetlands regulations, sewer service areas, sizes and scope of land use changes reviewed, etc. We either need more state oversight of comprehensive plans or DRI oversight.

I would agree that the comp plan process would need to be strengthened in some areas - minor tweaks.

I do not believe it would be adequate. Some Comprehensive Plans are way to open ended. A plan is only as good as the interpretation and enforcement.

There is no equivalent to the preapplication meeting and subsequent planning meetings involving the agencies and groups involved in the process. In addition, there is no equivalent process for evaluating the impact of a proposed development in one local government on nearby local governments that will be affected by the development. This lies at the heart of regional governance - i.e., the intergovernmental evaluation and coordination process.

There are areas of the state with substantial comprehensive plans that might be able to deal with major projects that affect other jurisdictions, but there are other areas where there's essentially no control. If we are to eliminate or modify DRIs, we need a better system of intergovernmental coordination.

Our local politicians yield to the moneyed interests too often.

Definitely not.

Yes, with a lot of technical assistance and incentives. For example, state and federal assistance with infrastructure investments could be conditioned on adopting plans that met Smart Growth criteria. (Smart Growth America could help define these or even certify plans.)

Local comprehensive plans are a farce; they are changed willy nilly to accommodate development.

Yes, but it is optional. So some communities will be better served by their Comp Plans while others will have minimal standards. This may encourage sprawl in the less developed counties that do not recognize the value of the Comp Plan.

Most comprehensive plans have the appropriate tools to create PUDs or other types of large scale development, require appropriate mitigation, approvals from other agencies, etc.

See above. It would help smaller counties to have planning help from the state and the coordinated early scoping process with environmental agencies should be kept.

Left to the local bought and paid for politicians, there's essentially no limit on what would get approved! NONE AT ALL!

It's difficult to get to the details within the comp plan reviews themselves

Local government decisions are made by elected officials - development cannot be carried out in an objective manner when there is no political backtrack for the approvals.

First, it is unrealistic to believe that a local government can withstand the temptations of enhanced tax revenues and promises of high paying jobs. Second, No local process (municipal and county) can effectively address the multi-jurisdictional impacts of developments that have real regional impact. Third, I doubt that the state legislature would allow local comprehensive plans to deal with DRIs, there have been cases where the State has interfered before and I'm sure they will again....See the first comment. It also applies to the state legislature.

Local governments need State oversight.

Regional Projects must have regional review - ensures input from nearby municipalities and forces master planned development rather than piecemeal development.

In the major metro areas where the growth is occurring, the answer is probably yes. In rural areas with limited resources (and limited growth) the answer is probably no.

In some of the larger local governments that have the staff and expertise yes. I am concerned about smaller governments, that may have pressure to develop without the support needed to regulate it.

Giving Free Rein to local comp plans could very well be worse.

Not with this DEO and the current administration's lack of interest in comprehensive planning and meaningful land development regulation. Some local governments do have good planning programs, just not enough of them. And now there's no one to monitor the other ones.
<table>
<thead>
<tr>
<th>Page</th>
<th>Text</th>
</tr>
</thead>
<tbody>
<tr>
<td>107</td>
<td>Some scale of oversight/technical assistance may be necessary for local governments not equipped to fully deal with the scope of such projects. But development is going to occur where the market dictates.</td>
</tr>
<tr>
<td>108</td>
<td>Local comprehensive plans are no longer based on compactness, consistency, and concurrency. They do not address cumulative impacts or regional impacts at all.</td>
</tr>
<tr>
<td>109</td>
<td>Local governments can’t anticipate what might walk in the door and local government staff is easily overwhelmed by the volume of data coming from a large scale development. Most wouldn’t even have an application or review process that could handle such large impacts.</td>
</tr>
<tr>
<td>110</td>
<td>For reasons stated prior. When a large development has multi-jurisdictional impacts, there needs to be an avenue to better collaborate. In addition, not all local comprehensive plans address large developments that have multi-jurisdictional impacts, nor do all local governments choose to collaborate with adjacent or effected jurisdictions.</td>
</tr>
<tr>
<td>111</td>
<td>The currently DULA process and other exemptions from the DRI process do not coordinate extra jurisdictional impacts of large developments.</td>
</tr>
<tr>
<td>112</td>
<td>Local governments are bought off by developers. They think of it as a job creator. However, the construction jobs are not local and there are no jobs when construction is complete. Developers do not have to pay the impact fees.</td>
</tr>
<tr>
<td>113</td>
<td>Effective state and regional comprehensives plans are also necessary.</td>
</tr>
</tbody>
</table>
Q5 In your opinion, which of the following functions would be significantly impacted if the DRI process is eliminated or changed? Please check those that you think are most significant.

Answered: 240  Skipped: 36

Answer Choices

<table>
<thead>
<tr>
<th>Answer Choices</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Intergovernmental coordination</td>
<td>65.83%</td>
</tr>
<tr>
<td>Affordable/workforce housing</td>
<td>25.83%</td>
</tr>
<tr>
<td>Transportation</td>
<td>64.58%</td>
</tr>
<tr>
<td>Wildlife and environmental protection</td>
<td>63.33%</td>
</tr>
<tr>
<td>Proportionate share costs (especially those affecting communities adjacent to the host local government)</td>
<td>58.33%</td>
</tr>
<tr>
<td>Vesting</td>
<td>19.58%</td>
</tr>
<tr>
<td>Follow through on infrastructure and other investments</td>
<td>57.50%</td>
</tr>
<tr>
<td>Growth and development patterns</td>
<td>68.33%</td>
</tr>
</tbody>
</table>

Total Respondents: 240

<table>
<thead>
<tr>
<th>#</th>
<th>Please add other impacts as appropriate.</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>More thorough and realistic analysis of costs is critical. These DRIs change and involve intense lobbying to bypass and overrule concurrency and to under-evaluate the impacts on the various local governments. Proportionate share needs to be reversed and concurrency restored.</td>
<td>7/15/2014 9:26 AM</td>
</tr>
<tr>
<td>2</td>
<td>Addressing multi-jurisdictional impacts</td>
<td>7/14/2014 9:05 PM</td>
</tr>
<tr>
<td>3</td>
<td>Let me preface this by saying that I don’t think the DRI process has been particularly effective in any of these areas except through the imposition of inequitable exactions not applied to non-DRI projects. I checked Affordable housing because the DRI process because in my experience, in my experience, is the only process that has even attempted to address this issue, but it is completely unfair and inequitable that affordable housing requirements must be borne only by DRI developers. This issue is a community-wide problem that should be addressed through jurisdiction-wide tax or assessment measures. It should not target only one segment of the development community.</td>
<td>7/14/2014 6:59 PM</td>
</tr>
<tr>
<td>4</td>
<td>Note: Environmental protection especially includes WATER! Insane profits vs. dry wells or polluted water. This is THE issue of the 21st century. Floridians have been blessed with an abundance of the best water on earth. Where are the rational minds in Tallahassee that should be working to prevent it?</td>
<td>7/14/2014 3:39 PM</td>
</tr>
<tr>
<td>5</td>
<td>All of the above. This is exactly what CAN happen.</td>
<td>7/14/2014 12:49 PM</td>
</tr>
<tr>
<td>6</td>
<td>Chances for affected governments to improve the quality of development proposals and invite opportunities for public input - this should be part of the process.</td>
<td>7/14/2014 11:11 AM</td>
</tr>
</tbody>
</table>
Cohesive long term planning at a larger scale (beyond local government) Loss of predictability

6/18/2014 8:44 PM
6/18/2014 5:06 AM
6/20/2014 9:36 PM
6/20/2014 9:17 PM
6/20/2014 9:48 AM
6/20/2014 9:27 AM
6/19/2014 10:34 AM
6/19/2014 9:45 AM
6/19/2014 12:06 AM
6/18/2014 5:13 PM
Florida’s Development of Regional Impact (DRI) Process

36  I’m a native Floridian. Greed seems to be the driving force that determines what gets developed and where. There seems to be little concern on the part of government for the natural resources of our once great state, or for the rights of native wildlife or existing Florida citizens. The people profiting from the rampant and unconscionable hyper-development of Florida, can easily afford to jet off to the multimillion dollar ranches and sprawling estates in less spoiled states, leaving Florida’s existing resident-taxpayers to clean up their mess, and live in the urban hell, and minimum wage squalid ghetto that they have helped create. I keep waiting for Tallahassee, or DC to grow a conscience, for there to be honest representation of citizens, and defense of our Country and State’s precious natural resources and wildlife, but the longer I live, the worse it seems to become. I don’t feel like I live in a democracy. It seems more of a plutocracy, and I, and most citizen-taxpayers, are simply the slaves on the plantations of the aristocracy, living on postage-stamp lots or tenements, and increasingly burdened with the rising costs of living, while our supposed “government representatives” stand by and watch while our waters are polluted, our wildlife extirpated, and the “Florida” quality of life, as we once enjoyed it, destroyed forever. Just so THEY can continue to enjoy a soft life of leisure, amassing wealth, while selling WE THE PEOPLE’s only collective treasures (our native Florida habitats, our once-clean springs and waters, our clean air, quaint sustainable rural areas, the functioning sustainable Florida ecosystem upon which we - and even the State tourism economy - depends).

37  Not checked the other factors because I don’t know enough about them to decide.

38  Every topic listed is currently governed and regulated by the county/city Comprehensive Planning process. The issue would be the status of existing older DRI that in reality in locations where growth and increased demand upon public services is not desired or warranted.

39  It is hard to pick and choose; each project is unique, and the impacts vary greatly from project to project.

40  Other than issues affecting adjacent communities, it’s been my experience that DRIs do not affect the other issues listed one way or another. They are either handled by state, federal or local agencies (such as environmental, transportation) or by local comprehensive plan (housing, development patterns). Communities have been able to get around vesting by requiring monitoring that eliminates vesting if certain conditions are not met and it is difficult to overcome those.

41  water pollution, stormwater runoff, aquifer contamination

42  Vested is an elusive concept these days in Walton County, where a bench requires a Development Order. (A Minor Development Order that can take months.)

43  In the current economic and political climate, any development is seen as good regardless of its impact.

44  Each for good or bad. It depends. Bad question.

45  What little thought that currently goes into FUTURE road & water impact, Police and Fire costs and community compatibility would vanish without DRI. Politicians only look at projected tax revenue and campaign contributions. Nothing else matters to them.

46  Some in government have the opinion that all growth is good and that is simply not the case. The current water shortage experienced by much of Florida and all of the environmental problems that has caused is one example where growth is causing more problems than benefit.

47  The answer is all of the above. I believe that elimination of the DRI process will actually improve these areas assuming local governments have strong plans and processes in place.

48  I assume DRIs are only happening in Central and North Florida now since I haven’t seen on in S. Florida for years. They may have specialized issues I’m not familiar with (like Famland preservation, for example). I think the basic issues that apply to all development would be addressed but the unique issues related to large scale impacts would be the most at risk.

49  Affordable housing may be a problem in few parts of the state like Collier, but I don’t see that as an issue today after the housing market collapsed. Even during the high in the mid 2000’s, there were analyses done in my area that showed housing was not an issue, although there was a perceive issue. Personal vehicle transportation will always be a problem. Until it gets to the point where it is cost and time effective to use public transportation, there will not be a demand for transit.

50  The current number of exemption for DULAs and small rural counties has thwarted the purpose of Chapter 380.

51  The DRI process provides a mechanism to measure and mitigate new growth. Typically, open space, environmental features of the land, functionality, traffic impacts address many of the community’s concerns and results in better development.
Q6 Does your local government or regional planning council publicly review and/or report on conditions which are part DRI development orders?

Answered: 245  Skipped: 31

<table>
<thead>
<tr>
<th>Answer</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>53.88%</td>
</tr>
<tr>
<td>No</td>
<td>13.88%</td>
</tr>
<tr>
<td>Unsure</td>
<td>32.24%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>#</th>
<th>If yes, please describe and include any enforcement activity.</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Although the regional planning council is moribund.</td>
<td>7/15/2014 2:23 PM</td>
</tr>
<tr>
<td>2</td>
<td>If the question is whether the local government and regional planning council follow-up after the DRI is in process, the answer is not generally. There is little follow-up to whether all the promises made by a DRI are met.</td>
<td>7/15/2014 9:30 AM</td>
</tr>
<tr>
<td>3</td>
<td>To the extent that DRI conditions are subject to public hearing processes, then this statement is correct. I don't know that either the ECFRPC or the various local governments in this region &quot;publicly review&quot; or report on conditions within DRI development orders outside of these hearing processes.</td>
<td>7/14/2014 7:19 PM</td>
</tr>
<tr>
<td>4</td>
<td>Development order is reviewed by the planning council, BUT the planning council has no enforcement capability.</td>
<td>7/14/2014 1:24 PM</td>
</tr>
<tr>
<td>5</td>
<td>DRIs require Public Hearing approval before the Hearing Examiner and Board of County Commissioners. After approval, all monitoring is administrative. THESWFRPC used to provide updates but have not done so since 2005.</td>
<td>7/14/2014 1:17 PM</td>
</tr>
<tr>
<td>6</td>
<td>My jurisdiction has a monitoring program. I'm uncertain about enforcement activities.</td>
<td>7/14/2014 12:55 PM</td>
</tr>
<tr>
<td>7</td>
<td>BUT, YOU HAVE TO KNOW AND REQUEST THE ROUTINE</td>
<td>7/14/2014 12:48 PM</td>
</tr>
<tr>
<td>8</td>
<td>If the question refers to review in the context of the required public hearings, the answer is yes. Otherwise, there is no public review.</td>
<td>7/11/2014 11:43 AM</td>
</tr>
<tr>
<td>9</td>
<td>The reporting seems to be piecemeal and does not seem to get out into the public eye, other than at staff level.</td>
<td>7/10/2014 2:46 PM</td>
</tr>
<tr>
<td>10</td>
<td>SWFRPC reviewed the two I am aware of.</td>
<td>7/10/2014 1:56 PM</td>
</tr>
<tr>
<td>11</td>
<td>Neither does much good under the current regime.</td>
<td>7/10/2014 1:40 PM</td>
</tr>
<tr>
<td>12</td>
<td>But their power and respect by folks within the region varies. And the way they operate seems to be more narrow than the region as a whole may require.</td>
<td>7/9/2014 5:28 PM</td>
</tr>
<tr>
<td>13</td>
<td>There are no DRIs in the jurisdictions where I work currently. I do not follow the RPC activities.</td>
<td>6/27/2014 10:15 AM</td>
</tr>
<tr>
<td>14</td>
<td>I do not understand the question.</td>
<td>6/27/2014 10:00 AM</td>
</tr>
<tr>
<td>15</td>
<td>Local RPC reports on final late and you have to know to ask. It is physically located an hour west of here so not much attendance. Plus, often not paid attention to by locals planners because they feel they know better and they usually do.</td>
<td>6/24/2014 11:04 AM</td>
</tr>
<tr>
<td>16</td>
<td>Annual reports</td>
<td>6/24/2014 9:32 AM</td>
</tr>
<tr>
<td>17</td>
<td>We rescinded our DRI in 2012 and hav not followed the local governments/ECFRPC efforts since then.</td>
<td>6/23/2014 2:49 PM</td>
</tr>
<tr>
<td>18</td>
<td>It varies - some regularly do and some don't. All are legally supposed to do so.</td>
<td>6/22/2014 8:05 PM</td>
</tr>
<tr>
<td>19</td>
<td>The record in Floridas northwest region is very spotty.</td>
<td>6/22/2014 11:11 AM</td>
</tr>
<tr>
<td>20</td>
<td>As a larger local government, we function as the coordinating agency rather than the regional planning council.</td>
<td>6/21/2014 8:36 PM</td>
</tr>
</tbody>
</table>
I have seen reports but not any enforcement activity.
Q7 Within your area, are you aware of any interlocal agreements with adjacent local governments that are meant to coordinate mitigation for development impacts from DRIs?

Answered: 245  Skipped: 31

<table>
<thead>
<tr>
<th>Answer Choices</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>36.33%</td>
</tr>
<tr>
<td>No</td>
<td>39.59%</td>
</tr>
<tr>
<td>Unsure</td>
<td>24.08%</td>
</tr>
</tbody>
</table>

Total 245

# Please elaborate if desired. Date
1. but to a limited extent 7/15/2014 10:54 AM
2. For many years the ECFRPC had boilerplate language in its recommendations that the developer would be responsible for negotiating an interlocal agreement with adjoining jurisdictions to mitigate cross-jurisdictional impacts and share impact fees. If the developer was not able to complete this task within 6 months, then the standard monitoring and modeling process would be effective. I don't know of a single DRI where this condition was successfully implemented. The local governments saw no reason to share the impact fees they would collect from the project. 7/14/2014 7:19 PM
3. Not for DRIs specifically, but there are many interlocal planning agreements in general. 7/14/2014 2:36 PM
4. BUT, I feel this would be negatively impacted if oversight is lessened. 7/14/2014 1:24 PM
5. There were agreements between Charlotte and Lee regarding Babcock Ranch, but I am unsure if they were "Interlocal" or some other kind of agreements. 7/14/2014 1:17 PM
6. MAINLY AIRPORT OR INDUSTRIAL TYPE DRI. 7/14/2014 12:48 PM
7. City (Cedar Key) and County (Levy) do engage in interlocal agreements regarding several areas of service and maintenance. 7/11/2014 1:00 PM
8. Tri-County Agreements 7/10/2014 3:11 PM
9. I know they exist, I don't know that they are really being followed or implemented as intended. I'm sure it's an administrative nightmare to ensure that conditions of approval are being followed through. 7/10/2014 2:46 PM
10. I believe Tallahassee-Leon County coordinates because they have one planning department. 7/10/2014 1:33 PM
11. The few that exist are a joke. 6/24/2014 11:51 AM
12. Example: two cities that went through Ch 164 dispute resolution process and voluntarily decided to adopt an agreement requiring them to confer and provide for comments on proposed developments located within a specified distance of the border between the cities. On one side, the development was part of a large DRI. 6/22/2014 8:05 PM
13. None are currently in place, and proportionate share for non-DRI projects already creates difficulties, so a DRI would only add more complexity to the issues. 6/21/2014 8:36 PM
14. No DRI's are currently being considered. However, in the pre-recession past such coordination was attempted by staff initiation but the DRI did not proceed. The MPO coordinates transportation with local governing bodies in the county and updates are provided on various long range plans. Any DRI would come here. 6/20/2014 9:38 PM
15. However, the DRI program is not necessary for such interlocal agreements to be entered into. 6/20/2014 2:08 PM
16. Yes, for both DRI's and non-DRI developments. 6/20/2014 12:05 PM
17. Interlocal agreements are not specific to, rather more general. This is a good thing. 6/20/2014 9:51 AM
18. No, but we are a DULA and we did put the policy in our ICE (intergovernmental element) that requires MPO and RPC review of new DRI threshold level development. 6/20/2014 9:31 AM
<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>19</td>
<td>Other processes handle this.</td>
</tr>
<tr>
<td>20</td>
<td>League of Cities and IPARC.</td>
</tr>
<tr>
<td>21</td>
<td>Yes, in multiple cases. The DRI's I am involved with work VERY closely with local government.</td>
</tr>
<tr>
<td>22</td>
<td>If they exist, they're not working, or are complicit &quot;yes men&quot; to the corporate developers.</td>
</tr>
<tr>
<td>23</td>
<td>Miami Dade Public Works oversees all traffic control on all cities streets. Miami-Dade water/sewer oversees most municipalities.</td>
</tr>
<tr>
<td>24</td>
<td>There may be some between Sarasota and Manatee Counties, but University Parkway with the interchange seems to be the poster child for why this has not worked. There are at least three DRIs in that area. All the DRI residential development has happened in Manatee, but the interchange is in Sarasota. Further, the construction of local roads serving the developments is apparently way behind the growth of those areas. Much of the DRI commercial development also occurred earlier in Manatee, but Sarasota is catching up. The two counties are in different regional planning councils. Any coordination among FDOT, the councils and the counties has not been able to avoid the problem, and the interchange problem has been making headlines recently.</td>
</tr>
<tr>
<td>25</td>
<td>ARPC - regional planning council Jolint comp plan - Tallahassee/Leeon County CRTPA - multi-county MPO</td>
</tr>
<tr>
<td>26</td>
<td>Gilchrist and Alachua counties swap traffic data.</td>
</tr>
<tr>
<td>27</td>
<td>See Monroe County.</td>
</tr>
<tr>
<td>28</td>
<td>This has never happened.</td>
</tr>
<tr>
<td>29</td>
<td>some better than other.</td>
</tr>
<tr>
<td>30</td>
<td>DRIs are mostly built out now in S. Florida.</td>
</tr>
<tr>
<td>31</td>
<td>Volusia County has an intergovernmental process through a Charter Amendment that requires a consistency determination between municipal and county comprehensive plans.</td>
</tr>
</tbody>
</table>
Q8 Do you think that the local government approving a DRI should be required to share documented project mitigation costs with adjacent local governments?

Answered: 246  Skipped: 30

### Answer Choices

<table>
<thead>
<tr>
<th>Response</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>70.33%</td>
</tr>
<tr>
<td>No</td>
<td>13.82%</td>
</tr>
<tr>
<td>Unsure</td>
<td>15.85%</td>
</tr>
</tbody>
</table>

### Total: 246

<table>
<thead>
<tr>
<th>#</th>
<th>Please elaborate if desired</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Six lane county highways that become two lanes at the county line are one example. Competing well fields are another.</td>
<td>7/15/2014 2:23 PM</td>
</tr>
<tr>
<td>2</td>
<td>There is no method for mitigating impacts for adjacent governments except for pipeline improvements or coordination with FDOT work program or adjacent CIPs which is voluntary.</td>
<td>7/15/2014 10:54 AM</td>
</tr>
<tr>
<td>3</td>
<td>Project mitigation costs that are solely within the purvey of the local government should be exempt from being required to share with adjacent local governments. However, other project mitigation costs that extend beyond the local jurisdiction, specifically transportation, should be shared.</td>
<td>7/14/2014 8:09 PM</td>
</tr>
<tr>
<td>4</td>
<td>I think there should be some means of having those local governments that benefit from developer contributions to infrastructure in their jurisdiction reimburse the developer for those contributions. Whether the “host” jurisdiction should share mitigation payments with adjoining jurisdictions depends on where the money is being spent. It is completely unfair to have a DRI developer (for example) pay Orange County for mitigation measures in Osceola County if Orange County does not give that payment to Osceola County and if the developer does not get impact fee credits or a reimbursement for that mitigation payment.</td>
<td>7/14/2014 7:19 PM</td>
</tr>
<tr>
<td>5</td>
<td>But again, to guide growth back to urban areas, mitigation requirements should be reduced for infill projects.</td>
<td>7/15/2014 2:36 PM</td>
</tr>
<tr>
<td>6</td>
<td>What would be the purpose of sharing mitigation costs? Isn’t it already public record and easily obtained?</td>
<td>7/14/2014 1:17 PM</td>
</tr>
<tr>
<td>7</td>
<td>Developer should pay.</td>
<td>7/10/2014 2:17 PM</td>
</tr>
<tr>
<td>8</td>
<td>I don’t think local governments should have to pay any mitigation costs for developers.</td>
<td>7/10/2014 1:40 PM</td>
</tr>
<tr>
<td>9</td>
<td>Regional impacts are certain from DRI scale developments.</td>
<td>6/30/2014 3:09 PM</td>
</tr>
<tr>
<td>10</td>
<td>Not only share cost but also share benefits</td>
<td>6/27/2014 11:36 AM</td>
</tr>
<tr>
<td>11</td>
<td>Vesting and mitigation costs are local and site specific based on a DRI’s build out and proposed development plans. I am concerned that being required to share the mitigation costs could needlessly inflate the cost of development.</td>
<td>6/25/2014 3:11 PM</td>
</tr>
<tr>
<td>12</td>
<td>They will not do and, even is willing, unless the developer can get credits from approving locals for those costs, won’t do the DRI</td>
<td>6/24/2014 11:04 AM</td>
</tr>
<tr>
<td>13</td>
<td>Not sure what the question is, but believe transparency and good faith cooperation is best in all circumstances.</td>
<td>6/23/2014 2:49 PM</td>
</tr>
<tr>
<td>14</td>
<td>Depends on the specific facts and circumstances</td>
<td>6/23/2014 12:05 PM</td>
</tr>
<tr>
<td>15</td>
<td>I am aware of multiple projects that were designed precisely to shed the costs on neighboring jurisdictions while retaining all the benefits. The comprehensive planning process alone is not strong enough to control this.</td>
<td>6/22/2014 8:05 PM</td>
</tr>
<tr>
<td>16</td>
<td>All information should be public record - isn’t it? The question is “documented”...how much information is discussed, but not documented?</td>
<td>6/21/2014 8:36 PM</td>
</tr>
<tr>
<td>17</td>
<td>The fault in this question is accepting the premise that the DRI program need to be associated with sharing any mitigation costs with adjacent local governments.</td>
<td>6/20/2014 2:08 PM</td>
</tr>
<tr>
<td>18</td>
<td>That applies to oranges comparison and sharing unless the adjacent local government is exact in its land mass, population and public facilities.</td>
<td>6/20/2014 9:51 AM</td>
</tr>
<tr>
<td>19</td>
<td>If appropriate.</td>
<td>6/19/2014 4:31 PM</td>
</tr>
<tr>
<td>Number</td>
<td>Comment</td>
<td>Date/Time</td>
</tr>
<tr>
<td>--------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>-------------------</td>
</tr>
<tr>
<td>20</td>
<td>But only to the degree that they are negatively impacted.</td>
<td>6/19/2014 10:38 AM</td>
</tr>
<tr>
<td>21</td>
<td>depends on the style of mitigation and impacts.</td>
<td>6/19/2014 12:09 AM</td>
</tr>
<tr>
<td>22</td>
<td>I tend toward answering yes, but this could well depend on the particularities of the project.</td>
<td>6/18/2014 8:49 PM</td>
</tr>
<tr>
<td>23</td>
<td>IF and only IF there is a clear and demonstrated impact to infrastructure (transportation) of REGIONAL or STATE significance.</td>
<td>6/18/2014 3:54 PM</td>
</tr>
<tr>
<td>24</td>
<td>ALL information about impacts should be shared with ALL affected.</td>
<td>6/18/2014 3:42 PM</td>
</tr>
<tr>
<td>25</td>
<td>I am a strong believer in transparency in government.</td>
<td>6/18/2014 12:03 PM</td>
</tr>
<tr>
<td>26</td>
<td>This may be one way to deal with some of the issues, and unfortunately, DRIs may be the only vehicle to allow intergovernmental</td>
<td>6/18/2014 11:45 AM</td>
</tr>
<tr>
<td></td>
<td>coordination of developer agreements. Perhaps there should be a different process to make that happen for any project affecting</td>
<td></td>
</tr>
<tr>
<td></td>
<td>another jurisdiction.</td>
<td></td>
</tr>
<tr>
<td>27</td>
<td>Was not aware that a local government could refuse to share public information with anyone.</td>
<td>6/18/2014 11:43 AM</td>
</tr>
<tr>
<td>28</td>
<td>where it can be shown there are impacts to adjacent local governments.</td>
<td>6/18/2014 11:34 AM</td>
</tr>
<tr>
<td>29</td>
<td>yes if the negative impacts extend across jurisdictional lines</td>
<td>6/18/2014 11:07 AM</td>
</tr>
<tr>
<td>30</td>
<td>The developer should.</td>
<td>6/18/2014 10:40 AM</td>
</tr>
<tr>
<td>31</td>
<td>Why would you need to do this since; for proportionate fair share it is not done.</td>
<td>6/18/2014 10:35 AM</td>
</tr>
<tr>
<td>32</td>
<td>Especially on watershed and water resource issues, and cross county road issues.</td>
<td>6/18/2014 10:29 AM</td>
</tr>
<tr>
<td>33</td>
<td>I’m sure that the approving government would want to share the mitigation costs with adjacent governments if you mean by costs -</td>
<td>6/18/2014 10:25 AM</td>
</tr>
<tr>
<td></td>
<td>expenses shouldered by the local government. If the mitigation costs are costs of the developer which are paid to the local</td>
<td></td>
</tr>
<tr>
<td></td>
<td>government, I doubt that many local governments would want to share revenues collected.</td>
<td></td>
</tr>
<tr>
<td>34</td>
<td>If the DRI process is done properly, every local government agency that is impacted by DRI will have had the opportunity to</td>
<td>6/18/2014 10:23 AM</td>
</tr>
<tr>
<td></td>
<td>indicate what their costs will be and the DRI orders will address the mitigation of those costs.</td>
<td></td>
</tr>
<tr>
<td>35</td>
<td>but hello, everything is already public record—adjacent local governments can get a copy of any related documents.</td>
<td>6/18/2014 10:19 AM</td>
</tr>
<tr>
<td>36</td>
<td>That would be helpful to know.</td>
<td>6/18/2014 9:52 AM</td>
</tr>
<tr>
<td>37</td>
<td>Depends on scale and location.</td>
<td>6/18/2014 9:45 AM</td>
</tr>
<tr>
<td>38</td>
<td>When they need it, they can ask for it. It's already public information and available upon request.</td>
<td>6/18/2014 9:37 AM</td>
</tr>
<tr>
<td>39</td>
<td>I have never seen a documented project mitigation cost with adjacent local governments.</td>
<td>6/18/2014 9:17 AM</td>
</tr>
</tbody>
</table>
Q9 Should the practice of "pipelining," which allows mitigation costs for several transportation impacts be used to make a single complete improvement, be continued?

Answered: 247  Skipped: 29

Yes 41.70% 103
No 16.19% 40
Unsure 42.11% 104

<table>
<thead>
<tr>
<th>#</th>
<th>Please elaborate if desired. Other (please specify)</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>The full effect of the transportation impacts should be blazingly evident. Houses will follow the roads. The MPO that designs the roads doesn't think about the water demands implied nor does it consider the conservation implications of the road, such as high speed roadkill and habitat fragmentation.</td>
<td>7/15/2014 2:23 PM</td>
</tr>
<tr>
<td>2</td>
<td>It has an uneven history, and today, typically under-estimates the true costs of impacts. The pipelining process only works well when the arbitrator (DCA, now DEO) is willing to appeal if the local government approval is not acting in good faith, something that is sadly lacking in today's political environment.</td>
<td>7/14/2014 9:08 PM</td>
</tr>
<tr>
<td>3</td>
<td>Absolutely! This is the only way to get significant transportation improvements constructed by the developers. These pipelined improvements should be 100% impact fee creditable.</td>
<td>7/14/2014 7:19 PM</td>
</tr>
<tr>
<td>4</td>
<td>But not always - only where cumulative impact benefits the community and all parties and adjacent governments concerned.</td>
<td>7/14/2014 6:04 PM</td>
</tr>
<tr>
<td>5</td>
<td>However, I believe that if this is new infrastructure somehow their should be a share to go to existing infrastructure otherwise curtail approvals for new DRI's that eventually can be more costly than existing infrastructure where existing lands are available for development.</td>
<td>7/14/2014 1:14 PM</td>
</tr>
<tr>
<td>6</td>
<td>Solely for public transit, nothing else.</td>
<td>7/14/2014 1:12 PM</td>
</tr>
<tr>
<td>7</td>
<td>DRI's are such large projects that it is simply impossible to mitigate all roadway impacts. If we intend to continue permitting such large projects, pipelining is the best way to handle mitigation.</td>
<td>7/11/2014 11:43 AM</td>
</tr>
<tr>
<td>8</td>
<td>Is the improvement a need because of the number of impacts in aggregate, or truly a need by the community?</td>
<td>7/10/2014 2:46 PM</td>
</tr>
<tr>
<td>9</td>
<td>If this means that projects are expedited without cumulative impact determinations then I am against it.</td>
<td>7/10/2014 1:40 PM</td>
</tr>
<tr>
<td>10</td>
<td>It is common sense but only in a limited financial sense, but is not transportation planning, and is not regional transportation planning. If there is an &quot;error&quot; in cost allocation, then local government will in the majority of instances have to pick up the difference, and system-wide issues in concurrency and traffic efficiency will still not be solved</td>
<td>7/7/2014 11:55 AM</td>
</tr>
<tr>
<td>11</td>
<td>This question needs further explanation</td>
<td>6/30/2014 10:13 PM</td>
</tr>
<tr>
<td>12</td>
<td>Maybe a project specific (case by case) determination</td>
<td>6/30/2014 3:09 PM</td>
</tr>
<tr>
<td>13</td>
<td>This is where the RPC's and MPO's could be very helpful by coordinating wish lists between multiple local governments.</td>
<td>6/30/2014 11:48 AM</td>
</tr>
<tr>
<td>14</td>
<td>Only if impacts are fully mitigated and local governments (and local residents) are not saddled with unfunded mandates to subsidize speculative land development.</td>
<td>6/27/2014 1:49 PM</td>
</tr>
<tr>
<td>15</td>
<td>This may be the only way to pay for a significant improvement, such as a new road.</td>
<td>6/27/2014 10:24 AM</td>
</tr>
<tr>
<td>16</td>
<td>It should be available to all projects, DRI level or below.</td>
<td>6/24/2014 11:51 AM</td>
</tr>
</tbody>
</table>
| 17 | Depending on the length of time, if it is within a reasonable amount of time and not in an area where many other DRI's could go then yes but if it where many developments are in the future and it is going to take 10-15 years or more for them to all go in then no. Why should the people that have been there have to suffer with an old two-lane road for 15 years. DRI's are supposed to pay for themselves. | 6/24/2014 8:33 AM
Flexibility is always good. I think it good to have a comprehensive look at the overall transportation network. Make new development pay for ALLLLLLLL the cost of the impacts of growth. This practice helps the State with their system and guarantees that the local government will have to pick up the tab for all the minor work (intersection improvements, access management enforcement, turn lanes and stacking bays etc.)

It's the only way in some cases to get an actual improvement made. This is the only responsible and reasonable way to address impacts. This is not a full answer to the problem, but can help in some instances. State funding for road projects is wholly inadequate and thus much needed projects languish without these other funding sources.

It is seriously concerned about the equity and due process involved in these processes. For example are pipelined projects put to the top of regional transport plans (or at least the local match) because the funding is available due to the match that developers provide while other projects without similar projects languish due to lack of public funding even if they have greater public funding and would contribute less to sprawl?

Unfortunately, concurrency did not work the way it should have and both developers and local governments have been able to game the system, probably on a piecemeal basis, resulting in many of the problems we see today. Traffic consultants are well paid to provide reports that make it work, and local governments either look the other way or are not qualified to provide the required analysis. Or they put the onus on the wrong party. This does not just apply to DRIs.

It is not a full answer to the problem, but can help in some instances. State funding for road projects is wholly inadequate and thus much needed projects languish without these other funding sources.

Otherwise, it is uncertain when or if some of the improvements will ever occur. It never worked.
Q10 Do you have any other insights on reforming or eliminating Florida's DRI process?

Answer Choices

<table>
<thead>
<tr>
<th>Answer</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td>62.72%</td>
</tr>
<tr>
<td>Yes</td>
<td>37.28%</td>
</tr>
</tbody>
</table>

Total: 228

I am a strong supporter and always have been of strong and uniform regulations regarding developments. Considering the historic loss of wetlands and other rare ecosystems in Florida, it is essential to have a DRI process in place, uniformly enforced, in order to assure Florida's infrastructure and its wild areas and waters are protected. Thank you My name is Ron Thuemler, from Hillsborough County, Florida.

I'm completing this Questionnaire in a second sitting so apologies if repeating. What is needed most in the process to assess a project's impact is honesty. The same group of bureaucrats who are responsive to mayors who always want more tax revenue from more and larger development - lead to predictable permitting results. "Overlay" zones around transit - TODs - are routinely approved. The impacts on most neighborhood/cities are overlooked. No school capacity. No real parts (planting strips next to sidewalks, really.) HUGE addl traffic burdens are just ignored (no, the "transit" isn't a benefit to residents that warrants the crunch and slow down of hundreds of addl housing units) Eliminating green space and giving green credits to areas many miles away doesn't create or maintain a nice place to live. Developers can build large projects - but they need to pay for ALL the burdens of impacts. It would also be helpful to have analysis of DRI impacts identified by staff and politicians. An aggregate report or statement doesn't provide accountability. Yes, a process of state review of large local projects is needed. Transportation and water basic planning is done with state entities. Oversight of local muscle is needed. Some think that regional government work would be helpful but, sadly, it is often just window dressing. Regional govt planning is typically the same cast of local govt parties. Too often, politicians just have a staffer attend for them (which is another problem.)

Florida needs the DRI process, or something like it, with effective state oversight to ensure the addressing of significant resources and multi-jurisdictional impacts. Without it, and the political wherewithal to effectively oversee it at the state level, Florida development will soon return to the abuses of the past. This is already beginning to happen in some rural areas, that are unfortunately approving inadequate development proposals that will accommodate 100-years or more of growth in some sensitive environmental areas, without adequate infrastructure. Unfortunately, these developments will long burden the citizens of such areas with their un-addressed impacts, and costs.

As I pointed out early, larger cities would (or should) have Comprehensive Plans that adequately deal with DRIs, while the smaller ones would not. Therefore, two distinct DRI processes may be necessary: one for larger governments and one for smaller governments. In regards to the larger governments, the DRI process should be less intense and the DRI approved more quickly. Smaller governments would have the opposite – a longer, more intense process. However, the process should not be so long or intense that the developer would simply abandon the development, never recuperating the cost it has already incurred. While this is not specific to the DRI process, considering the fact that many local governments adopt similar, if not the same language in various Elements of the Comprehensive Plan (Intergovernmental Coordination comes to mind), perhaps a DRI Element is in order? It would have clear and concise language about what is required, what is not, etc. Some language would have to be the same, some not. It is evident that every community is different, having different needs and wants, and they should have the ability to be flexible with certain regulations. As long as they provide a sound basis for doing so, each local government could either eliminate a requirement, decrease/increase the amount of something required, or change the language to fit their particular community.

Lots of work is needed in this area to eliminate current inequities and treat developers with existing, vested DRI's fairly. Unless some form of impact fee credits or reimbursements for developer contributions across jurisdictional lines is implemented, there will be continued pressure to dismantle the DRI process.

Do not eliminate the DRI process. It's critically important to the long-term well-being of Florida's citizens, growth management and natural resources.

The DRI process is the only way to ensure impacts spread over several cities/counties can be evaluated and mitigated. If not utilized than the larger, richer, more politically connected unit of government will dominate and dictate. The concerns of residents in other jurisdictions will be ignored or – at best – given lip service.

After the gutting of the state's Growth Management laws and agencies by the 2011 Legislature, the DRI law is more needed than previously.
Florida's Development of Regional Impact (DRI) Process

9 please see previous comments 7/14/2014 3:26 PM

10 Statute needs to clarify how and make it easier for local governments to rescind or vacate very old DRIs that are largely built-out or DRIs where developers are unresponsive or no longer an on-going concern. 7/14/2014 2:39 PM

11 We must have a DRI process. Florida is a poster-child for poor development, we must not repeat those obvious mistakes. 7/14/2014 2:07 PM

12 Florida's waters and other environmental resources need better protection from over exploitation. 7/14/2014 2:02 PM

13 Bring back the DCA 7/14/2014 1:25 PM

14 DRI's reviews may be more appropriate at the Regional Council level where it is aware and involved on a daily basis with the issues, information and politics of the region. 7/14/2014 1:16 PM

15 The DRI process provides essential minimum professional review of development projects and should be retained. 7/14/2014 1:02 PM

16 WITH THE CURRENT LESS THAN EDUCATED ELECTEDS (LOCALS, REGIONALS AND STATE) IT IS BECOMING EXTREMELY HARD TO CONVINCE ELECTED THAT ANY GOVERNMENT PROCESS IS BENEFICIAL TO WHAT THEY PERCEIVE AS THEIR "CONSTITUENTS". WE NEED TO LOOK AT REVISION EDUCATING AS A WAY TO REVERSE THE PROBLEMS. CIVICS, GENERAL GOVERNMENT STRUCTURE, HISTORY EDUCATION NEEDS MUCH GREATER EMPHASIS. IN THE INTERIM ENTITIES SUCH AS "LEAGUE OF CITIES" MANDATED EDUCATION COURSES FOR ELECTED OFFICIALS NEED TO BE INCREASED. IN FACILITATION MAYBE WE NEED TO TRY SOME LEGISLATION SEEKING SUCH EDUCATION OR THE "BACK DOOR" MAY BE ENTITIES SUCH AS THE "ETHICS COMMISSION"?? (1000 FRIENDS COULD WRITE SOME LANGUAGES!!) 7/14/2014 1:00 PM

17 If the DRI process is eliminated, certain criteria must be incorporated into local regulations, including the jurisdiction's Growth Management Plan and land development regulations. 7/14/2014 12:58 PM

18 I think the key with this legislation is to be flexible but not to allow the process to become out of control. Some local governments will "sell their souls" to get jobs which is not always in the public's best interest. 7/14/2014 12:51 PM

19 Don't eliminate DRI review. Strengthen the ability of the state and regional councils to control sprawl. 7/14/2014 11:14 AM

20 I am really not up to the process as of recent changes in Tallahassee. 7/11/2014 1:02 PM

21 The current DRI statute and rules are so complicated and obtuse that they are practically useless. This is due to the accumulation of statutory and rule changes since the process was created. In my opinion, it is time to do away with the DRI and create a more streamlined, limited process designed to provide state or regional assistance in development review to smaller local governments. 7/11/2014 11:50 AM

22 water quality and quantity, and environmental degradation should be regulated for the Public Good and Not fall victim to greed of the highest bidder. 7/10/2014 4:15 PM

23 DRIs need to allow for flexibility in changing demographics, technology, and conditions...what was conceived in 1990 may no longer be relevant in 2020. 7/10/2014 2:48 PM

24 Unfortunately, we will most likely experience exponential growth here in the next two decades, catastrophic disaster not withstanding. In order to mitigate the population increases and impacts, particularly to water supply and wildlife habitat, we need to do everything possible to cluster development. Unfortunately, the powers that be cannot or refuse to see the benefit of protecting our resources. When the state chamber of commerce fights against protecting our springs we are in a pretty pathetic situation. Can't make this stuff up. 7/10/2014 1:50 PM

25 1000 Friends needs to continue to aggressively championing growth management and environmental protection in Florida. 7/10/2014 1:35 PM

26 Get rid of it. 7/10/2014 1:34 PM

27 I continue to believe that the RPCs are the best forum to review regional and multi-jurisdictional impacts of large scale developments. 7/10/2014 1:33 PM

28 Look at how the first FL DRI fared over time for your answer. 7/9/2014 5:28 PM

29 42 years later, FL's DRI process arguably is redundant and not needed. But local planning has been undermined and is in no strong position to absorb the intent and procedural requirements of the program through the comp planning process -- the only remaining vehicle to address development. DRIs could be safely eliminated if the other component of Ch 380 were expanded significantly - Areas of Critical State Concern. A key element of DRI's is that there was a "higher" level of review. Were DRIs eliminated state guidance would be appropriate to ensure that that the State's anti-sprawl objectives are met. 7/7/2014 12:00 PM

30 It should not be eliminated. It should be strengthened by going back to its original purpose- ensuring that development's impacts on regional resources are mitigated for. Protecting the region from adverse effects (transportation, housing, environmental) of a single development. 7/1/2014 4:40 PM

31 Total elimination of the DRI process does not seem practical because existing projects will have to be accommodated in order to continue as well as to establish parameters for changes or modifications. If this is the case, then the complaints typically issued about the process will not be resolved by eliminating requirements for new projects. In my experience, the DRI process is vulnerable to variations of interpretations and methodologies. Because of this, developers are not able to rely on the process as a reliable negotiation for rights in exchange for improvements. 7/1/2014 8:18 AM

32 PLEASE BRING BACK THE DCA. Obviously our local governments cannot or are unwilling to provide language protecting resources, steering growth to appropriate areas. One of our county commissioners commented that they need to pass everything now just in case SCOTT does not get in again. I am sorry what message do we want to send? 6/30/2014 10:18 PM

33 There is extensive data that the health of the community is adversely impacted by sprawl. There must be a mechanism to ensure each new development decision is improving the built environment for pedestrians and bicyclists. Since Florida has multiple urban areas where pedestrian fatalities are a serious public health issue, there should be careful thought given to improve the DRI planning process. 6/30/2014 3:11 PM

34 The DRI process is moot without a strong DCA. The DOE is useless. The requirement for DRI process is stunted by DULAS and the TCEA type allowances. The process has been broken in favor of enhancing the wallets of few over the concerns of the many. Without a strong state land use agency with a mission to look out for the public, the process is a sham. 6/30/2014 7:37 AM

35 The pendulum has swung too far in favor of developers; local governments are not enforcing existing agreements in some cases, and sub-DRI development continues to have significant unmitigated negative impacts to local economies, ecosystems, transportation systems and other public resources and infrastructure. 6/27/2014 1:52 PM

36 Increase rules that were previously established to review on a more comprehensive impact 6/27/2014 1:38 PM
The process has been whittled away. Might as well eliminate it.

If DRI’s do go away, the Regional Planning Councils need to have a similar role in Sector Plans. Local governments will need greater involvement from Department of Economic Opportunity for sub-DRI projects.

don’t give up on the process; it is an important bulwark and shores up comprehensive planning, which itself is under siege

Regrettably I don’t have the time to elaborate.

The DRI process should be retained and required for all development outside existing urban service areas as designated in local comprehensive plans.

minimize state involvement in growth and planning

Even if the DRI process was eliminated the DRI DOs would still be in existence and would need to be addressed in some manner. All the conditions of the DOs would require overview and implementation efforts that are not normally done at the local level.

The DRI process has served to drive up the cost of development, increase risk, and introduce economic uncertainty into local and regional economies. I is probably time to eliminate, or significantly simplify the process.

Elimination DRI would be another victory for the Koch/Monsanto corporate lack of vision and concern for our residents and their future

There is little to no discussion on future water use planning.

Fundamentally, it is a good idea. Get rid of whatever excesses of paper are currently required, create flexibility in the methodologies so it doesn’t drive sprawl, but keep the basic concept.

First insight - The requested entitlements are typically “over estimated/requested” - And there is no reality or repercussion. And when proportionate share “contributions” are deferred/delayed to actual later development milestones or actions, and the actual project “under builds”, it sets up the local government to be underprepared when “anticipated resources” a no longer “warranted”, and the developer is simply able to walk away and not be subject to any contingency for “not living up to their claims” that government had to honor. Second insight - The “liming/phasings” is often unrealistic - either the project builds faster than expected, or struggles for years beyond its approval - both situations trap local government in an unexpected situation, and because of the terms, they can’t “renegotiate”. (And I’m not referring to the buildout extensions allowed by the legislature due to the economic downturn.) Third insight - The FQD Program has merit and benefit - but it is ignored - the state is its own worst enemy - it is something to be advertised and touted. But the FQD point system is flawed. Doing what is required by minimum law should not get you points to qualify as an FQD. The point system should be expanded to provide levels - so a developer can “select” the components and characteristics that best suit their project. Then reward them with the FQD license/designation, and let it give the developer some streamlined opportunities and exceptions - so they opt for FQD and not just a plain DRI. If they aren’t going to truly do any of this - then scrap the FQD program. Fourth insight - When the original developer sells off pieces and then walks away, it is especially troubling when the developer did not assign and distribute the entitlements with the sales of the properties. It pits one property owner against another for development entitlements, and leaves the local government trapped in the middle. Fifth insight - Annual reports are a great concept, but they are often and constantly forgotten, and there is no real penalty for not filling them - which is odd because it is how all the agencies are able to “keep track” of them - including the state which created the DRI process. But, it is difficult to require and complete them as the ownership fragments. Let the “annual reports go”, in return for a requirement that a master developer HAS to assign entitlements with their property sales and make those assignments part of the public record with the sale (filed in the local government Official Records books like the filing of a deed for property - better yet WITH the deed that the transfer is associated with) - I don’t need to know the price paid, but I need to know how many *entitlements* a purchaser acquired - as so do the other parties doing their due diligence later. Sixth insight - When a DRI is ready for closeout - there is usually no master developer left, and the current owners are often “clueless” - allow local governments to apply for close-out - they aren’t allowed to do it today - they have to coax an owner to do it, and very few are willing or understand, and when the other owners become aware they “speak up” and it turns should be a relatively “simple” process into a long drawn out one.

As a planner w/both public & private experience in FL, I believe RPCs have played an invaluable role as an “honest broker” in the large scale development process. I believe the RPCs have been objective and have provided an overall benefit to the state & its residents.

First and foremost we must retain the DRI process to include participation by abutting jurisdictions or we will have sprawl. The natural environment must be preserved to the most possible extent. There must be a need for such development. These laws need to be strengthened on the state level, not weakened. There should be open, transparent and ethical disclosures on beneficial ownership. There should be time limits on permits when development has not started, with no guarantee of extension.

It seems that more protections are systematically eliminated or relaxed. Florida needs protection from developers who want to squeeze every penny out of their projects instead of valuing what open space, etc. brings to the table.

This is an outdated regulatory process that was set up before there were mandates for local government comprehensive plans in Florida. It is duplicative of other local and regional permitting processes through local governments, water management districts, DEP, the Army Corp, etc. They additional burdens of the process result in development proposals that stay under thresholds and therefore result in the exact opposite of what was intended.

Need DCA to have more enforcement power

Send any and all involved in the process to legal and financial research class so to learn exactly with whom you are doing business.

All change is not bad. Let’s consider some refinement, a tiered approach or other to the process. The old/current process had and has many defects and in the end, it’s more about where the growth occurs and how, than what process we invent and hoops we make them jump through – it should be about the outcomes.

Simplify, Streamline, and have the State Government provide adequate funding...

DRI elimination would wreck havoc.
The current rules and requirements are cumbersome and duplicative. This statute was adopted many years ago and it needs to be updated to clearly identify and address regional impacts of DRIs. Comp planning and the sophistication of local governments to practice good growth management has increased significantly so that many of the requirements of a DRI are now unnecessary. However, the State legislature has made many piecemeal changes to various aspects of DRIs, including the thresholds for DRIs, extended timetables, and transportation impacts of DRIs. These piecemeal changes are contrary to the stated goal of the Community Planning Act to allow local governments to deal with local planning and development issues. So these changes are also now part of the problem with DRIs. What is lacking is meaningful predictable standards to address regional impacts and to require the approving local government to require their DRIs to adhere to those standards. Lastly, local governments should be restrained from approving multiple DRIs in areas that clearly can not support that level of activity.

I think the extent to which proposed changes to the master plan of a DRI must meet current comprehensive plan requirements (the "Baypoint" decision) should be elaborated on in Chapter 380. It would help both developers and local governments determine the extent of "vesting," which is a constant source of controversy and argument.

For all the burdensome process, too often, requisite off-site infrastructure is provided long after impacts degrade service conditions in surrounding areas or capacity constraints preclude provision of effective capacity. Find a way to prevent development for which capacity simply can’t or won’t be cost-effectively or physically provided.

As long as the Legislature keeps providing extensions and exemptions I believe the process becomes meaningless and discriminatory. Given today's environment, with sea level rise, faltering economies, unaffordable insurance schemes, difficult mortgages, uncertain water supplies, bubbles, etc; I really don’t see a demand for development orders covering hundreds or thousands of acres and decades for build out. The science falls apart when time frames are interrupted because the impact studies are snapshots in time.

The process needs to be retained to address those projects that involve true extra-jurisdictional impacts. All other projects should be exempt.

See comments to Question 1 and 2

The DRI process has been a benefit to FL, and needs to continue and be strengthened to help make up for other unfortunate weakening or eliminating of growth management practices. A statewide program is a must, and has made FL's program a model for other states.

Putting my mind to this issue would take more time than I currently can afford, so I'm not going to attempt a response in the interest of getting my first nine answers back to you.

It is not the "big developer" that needs less regulation, it is the small one, and the small business. We are making it harder for the infill developers and giving carte blanche to DRI developers. DO NOT DO AWAY with DRI's. It's bad enough that there is no more DCA, SUS, 163.... what else???

I have worked in different states which have regulations and procedures to address these type of significant projects. I have found over the past 30 years that Florida's is the least effective for protecting both the landowner-developer and the local communities-citizens of Florida.

Give the Public meaningful actual notice (television, US Mail to registered voters or County taxpayers) of proposed DRIs; give Public rights as stakeholders (hold public workshops or hearings), allow public input, suggestions, reasons to deny or require amendment of proposed permit; and allow residents to vote on (approve / deny) permits for proposed DRIs that affect them.

We could go back to a State Growth Management Plan? Have the "advantages of elimination been clearly articulated? Have short-term advantages been compared to, and weighed against the value of longer term prudent planning?

I'd like to see a clean process to abandon existing DRIs. I'd like a process to amend existing ones through a less rigorous process. And the thresholds need to go up. Urban areas don't need the hassle. And we need the regional to have the staff to help. Get rid of the requirement for state review. Why bother with it? Maybe the state can be used as an appeal process for dissatisfied parties.

We need checks and balances. The decision is how to procedurally include those. Recent years the legislature has overstepped their authority in my opinion since they have imposed on local home rules, reduced gov't agencies by writing policies (this is a executive function); add specifics in bills about which transportation projects are included, etc... I would prefer the state to go to a regional system of government for land-use, historic preservation, water management, FDOT, environmental in 7 regional offices. That way the staff is familiar with local conditions, coordinate with local authorities, and balance choices. This would mean transforming county planning council "boards" and regional planning council "boards" to committees that report to one "regional management board" that would be comprised of 50% state staff and 50% local appointments with one regional manager to oversee and break a tie vote. This would help redefine DRIs, CRAs, special taxing districts, TIF districts, etc.

Not a good idea to eliminate processes that require a thorough impact review.

1. I am not sure that the benefits of the process justify retaining the process especially with all of the exemptions and exceptions that have already been handed out. The CPA process could be tweaked to replace it. 2. An idea worth trying would be to offer performance standards as a way to avoid the process. As an example, although Project ABC exceeds the thresholds it can be exempted by preserving scrub jay habitat and guaranteeing that a percentage of the units built will be affordable. 3. Must limit what is regional and what is not. 4. Must enforce development orders and must police RPC's and local governments who confuse a DRI with Christmas morning.

I have been working with DRIs for over 20 years and they don't appear to address the problems created by sprawl and lack of infrastructure planning. It's a process that developers undertake and work through with highly paid consultants who know how to get it done. Frankly, having tighter local comprehensive plans with more intergovernmental, regional coordination (including intergovernmental development agreements) might result in a better system. For example, as mentioned previously, government at all levels was unable to anticipate and address the traffic problems in an area with at least three affected DRIs in a two-county area. On the other hand, the regional water planning initiative with the Peace River Water Authority is a great example of how it can work to the benefit of all.

Hold another ELMS process, and make sure that the committee is more balanced than the last one.

RE: elimination Smaller local governments may not have the Planning staff and tools to properly evaluate a project that would be a DRI. As a DRI, the applicable RPC would conduct a review that would supplement the local govt. review. Without DRI process, each local govt. would have the authority to approve a project that may adversely affect another local govt. without necessarily allowing that other local govt. to participate in the process (at least prior to public hearings) and/or without mitigating for those impacts. That is, a local govt. could approve such a project with total disregard for impacts upon another local govt.
Suggest a major overhaul of the process. Many DRIs have been poor examples of inefficient suburban sprawl development. Shift emphasis away from the entitlement driven, process intensive approach to measurable outcomes. Adopt strong technical standards like a minimum overall density, mandated transportation connectivity, complete street multimodal mandates, transit service, meaningful affordable housing requirements, compact phasing plans, deadlines for performance, mixed use ratios and standardized fiscal impact analysis with specific minimum standards. If the local government is technically capable of evaluating the project, eliminate the need for the RPC. This can be an option if certain criteria is met. Make the DRI process relevant, or it will be eliminated and nothing will replace it. This has already occurred to some extent with the sector plan process. If there is an overhaul, rename the process to avoid association with past DRIs.

Our Tea-tard governor and the 'publican legislature will continue to chip away at any efforts to coordinate development.

Over the past few years, many of the growth management laws that were in place to insure that growth was affordable and minimized the loss of rural lands have been eliminated or reduced in effectiveness. The DRI process is critical to the long term health of Florida. The idea that all growth is good must be replaced by the notion that only growth that meshes with the comprehensive growth plan for an area is good. The current practice of constantly changing future land use maps and zoning laws to match the whims of a developer only helps the developer and no one else.

Remove the confusion from the rules and Statutes. One should not have to be a lawyer to understand it. Provide for coordination between the Comprehensive Plan Amendment and DRI review and approval process. Remove the threshold presumptions and establish a set threshold.

The DRI process was originally separated from the planning process at DCA, which perpetuated the problem. Get the state involved in scoping meetings for large development, provide funding mechanisms that currently don't exist to provide the infrastructure. Make sure the stormwater systems in the DRIs are managed by a quasi governmental or government agency fully funded to make them last and function long term. Stop vesting large amounts of development, which only provides a product to sell, which may never be built and often doesn't serve the public interest.

It was a terrible mistake for the state to do away with the Department of Community Affairs. They no longer give adequate review of local comp plan amendments. As a result, comp plans are a joke in most jurisdictions. I have seen many amendments get approved that are totally contrary to the goals of the comp plan. They are riddled with exemptions, approved based on nothing more than enabling a particular project for a favored developer. It's a disgraceful and corrupt situation.

I'm not sure what the alternative should be. I do know that the DRI process is one of the most corrupt and ridiculous planning processes. The process used by the SW Florida Regional Planning Council is probably one of the best primarily because the RPC is equipped to do the necessary land use and design planning necessary to combat developer's consultants. Elsewhere in the state, the process takes years, costs millions, and ultimately doesn't lead to a better product. It just leads to sprawl development in counties and draws from developing and redeveloping cities.

DRI's and regional coordination are necessary for regional development! In many areas, the local implementation and enforcement needs an overhaul to ensure ongoing compliance with all the original DRI supporting reports and documentation.

The state should look at and encourage models of regional planning like the "How Shall We Grow?" planning process that Central Florida undertook and is still using today. This process brought leaders and citizens together to create a vision and more importantly, created open dialog between elected officials (Congress of Regional Leaders) and with affected parties in public/private partnerships. This takes courage and perseverance but ultimately is an ideal model for sustainable growth. The billions spent on statewide implementation of the DRI process over the decades could have been better spent buying environmental sensitive lands for permanent protection and to help steer growth away from these areas.

I don't think the practice of large scale development will continue. The developers are no longer able to take on the kind of risk associated with it.

It will only be effective to revise this process if the whole growth and economic development strategy is revisited. It is unclear where it fits in to the state strategy - if our economic development plan is population growth, why regulate it all at? Make sure it does no more harm than it currently does, until some long-term vision can put it in its proper perspective. Less process, sure, but better results in the built and natural environment should be the goal.

It's all in the details and specificity of each and every DRI proposed and just WHO is responsible.

I would just be nice to stop talking about it after 30 years. I don't see it as terribly significant to warrant all the continued fuss.

I do not believe the DRI process should be eliminated. I believe it should be made stronger, and should not exempt DULAs. This is problematic especially when a city is a DULA, but the county within which the city is located is not. The county may have to bear the burden of the impact of the development, without any coordination from the exempt city. Also, local politics can be such that politicians have a strong desire for the development, and do not concern themselves greatly with the impact or mitigation requirements of the development.

The only group well-served by continuation of the DRI process is highly-paid consultants engaged to produce endless reports and analysis documents. The comprehensive planning and implementation process adequately ensures that infrastructure will be available to serve new development, and other mechanisms exist by which local government can ensure that new development pays its own way. DRI regulations have become nothing more than a tool for slow growth and no growth groups. DRI requirements burden local governments by duplicating staff demands. The long-term vesting inherent in DRI status and the cost investments it represents, perhaps unintentionally, create a disincentive for owners to undertake new plans for their properties incorporating new and beneficial planning techniques. End DRIs entirely.

Get rid of the tree killing paperwork that no one reads to a report that is focused on environmental or regional infrastructure impacts.

The DRI process needs to be relaced and strengthened.
Florida's Development of Regional Impact (DRI) Process

Q11 Do you work with Florida's DRI process on a regular basis?
Answered: 242  Skipped: 34

<table>
<thead>
<tr>
<th>Answer Choices</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td>43.80%</td>
</tr>
<tr>
<td>Yes, as staff at the local government level</td>
<td>20.25%</td>
</tr>
<tr>
<td>Yes, as staff at the regional government level</td>
<td>5.37%</td>
</tr>
<tr>
<td>Yes, as staff at the state government level</td>
<td>1.65%</td>
</tr>
<tr>
<td>Yes, as a private sector developer or planner</td>
<td>17.36%</td>
</tr>
<tr>
<td>Yes, as a concerned citizen</td>
<td>11.57%</td>
</tr>
</tbody>
</table>

Total 242

# Other (please specify)
1. director on the boards of five NGOs
2. 2 buttons: I also worked as a concerned citizen. I was able to observe different governmental levels at work.
3. Retired. Worked with DRIs extensively in the 1980's, 1990's, and occasionally until retirement three years ago.
4. Actually, as an attorney in private practice representing many DRI developers.
5. I'm just a person who has to live with the consequences of bad development decisions.
6. NOT ANYMORE IN AS MUCH AS I AM GETTING OLD
7. Not today.
8. I answered "yes" above to complete the survey. None of the above apply to me. I have participated in the DRI process as a lawyer representing developers, local governments, or citizens groups.
9. As Chair of a town LPA
10. Retired but familiar with history and recent changes instituted under current governor who hired a developer to dismantle DCA and dismantle DRIs.
11. And have as a public sector planner –
12. WE NEED HELP!!!!!!!!!!!
13. I used to as local government staff. No longer work in that capacity.
14. Not on a regular basis but on occasion as staff at the local government level.
15. I have in the past but not presently
16. Retired now but did work with them during my working life
17. Yes, as a local government attorney
18. I deal with them daily (and I do mean daily).
Florida's Development of Regional Impact (DRI) Process

19. When it is proposed I will work with it as a member of P&Z as well as a politically active private citizen.  
6/20/2014 9:39 PM

20. This is an anonymous survey.  
6/20/2014 2:10 PM

21. only occasionally  
6/20/2014 1:35 PM

22. Thanks for asking and best wishes. We should all work together.  
6/20/2014 9:34 AM

23. Also used to be a local government planner in a jurisdiction with many DRIs.  
6/19/2014 11:27 AM

24. I used to.  
6/18/2014 8:53 PM

25. No, but I'm used to.  
6/18/2014 8:02 PM

26. I used to be a field biologist for an environmental consultant, and no matter what listed species or threatened habitat(s) we documented on sites proposed for development, the local, regional, and state authorities that SHOULD have demanded meaningful protection of said listed species/habitats, to my knowledge, never did. The permits proceeded with no meaningful mitigation or protection. The whole process just seems bogus, Mr. Pattison; we, sadly, though we earnestly sought to well document the wildlife and habitats we surveyed, THINKING that our findings might lead to protection of the species/habitats documented, finally realized that we were just part of the "window dressing," smoke-and-mirrors of what is basically a "rubber stamping" process that pretty much always allows development to proceed in Florida...no matter who gets buried under the bulldozers, no matter what rare essential habitats are destroyed, or which listed species, now without home, will never be seen in that County again. I still vote, but all the candidates seem the same these days - like they've all been endorsed by the greedy despots, the corporate aristocracy that really runs our state and determines how the REST of us will live. I keep running North, away from the sprawl, but soon there will be no natural, unspoiled place left in Florida into which an underclass proletariat can afford to retreat.  
6/18/2014 3:57 PM

27. Thanks for asking for input!  
6/18/2014 2:26 PM

28. Hire Dan Trescott to fix it. And hire Matt Noble. He can help.  
6/18/2014 1:38 PM

29. Previously in several municipalities in south Florida.  
6/18/2014 12:48 PM

30. Thanks for asking! Good luck....  
6/18/2014 11:46 AM

31. I did for 20 years but am now retired. I served as a Local gov't elected official and as a member of the ARPC  
6/18/2014 11:08 AM

32. As previously stated, Gilchrist County and DCA/DEO have successfully avoided considering any development a DRI.  
6/18/2014 10:53 AM

33. The recent recession slowed growth and the request for developments that would be subject to the DRI process, but an improving economy will again fuel the desire for large developments. I know of one DRI review process that helped protect over 5000 acres from development and that area is now a wildlife preserve. I have also seen developments that were originally subject to the DRI process, change dramatically in scope and intensity once the new laws exempted the development from the scrutiny of the DRI oversight.  
6/18/2014 10:45 AM

34. Former DCA attorney.  
6/18/2014 10:33 AM

35. I have worked on DRIs as staff planner, as Planning Consultant and as a Developer; and more recently also as a County Planning Commissioner. Please don't loose the process and close the loopholes that allow large regional developments to slip through the DRI process.  
6/18/2014 10:22 AM

36. I did at one time (prior to SB360) but haven't recently.  
6/18/2014 10:18 AM

37. Clean water is the most precious commodity we have. Everything in our combined efforts must be aimed at conservation and impact.  
6/18/2014 10:17 AM

38. Not recently. Not enough activity. In the past, at local and regional government levels.  
6/18/2014 9:56 AM

39. I did a long time ago in another community, but where I live and work now, its so built out that DRIs are very rare.  
6/18/2014 9:54 AM

40. The first 15-years of my career in the S. Florida private sector, it was my specialty and I loved it. From 1985-1995, worked on 5 or 6. The last annual report I did for the SR7/441 (Wellington Green) DRI was in 2010. I worked on that DRI from 1995-2010. Since then, I haven't worked on a single one.  
6/18/2014 9:41 AM

41. Currently, I do not have any active DRI projects I am managing. I have also worked with Florida's Sector Planning Pilot, and as a private consultant providing DRI reports. I wouldn't say I work with the DRI process on a regular basis.  
6/18/2014 9:37 AM

42. Development attorney.  
6/18/2014 9:22 AM