

**EVALUATION AND APPRAISAL REPORT**  
**G. INTERGOVERNMENTAL COORDINATION ELEMENT**

Preparation of this document was aided through financial assistance received from the State of Florida Evaluation and Appraisal Report Assistance Program authorized by Chapter 93-206, Laws of Florida, and administered by the Florida Department of Community Affairs.

Prepared September, 1998, by the Putnam County Planning, Zoning and Building Department  
Updated June, 1999, by the Northeast Florida Regional Planning Council

**I. General Status of the Intergovernmental Coordination Element**

Below is an analysis of the Intergovernmental Coordination Element. The analysis is divided into four parts. Part A is an assessment of the background document on which the adopted portion of the element is based. Part B identifies recommended changes to the goals, objectives and policies based on the assessment of the background document and any changes to growth management laws and rules. Please note, further assessment of the objectives and policies is the subject of Section II of this document which includes additional recommendations for amendments to the objectives and policies and provides an assessment of the plan at the date of the EAR. Part C is an assessment of adopted figures, such as maps and lists, which includes a recommendation regarding whether to retain, delete or amend them. Part D is an assessment of adopted tables which includes a recommendation regarding whether to retain, delete or amend them.

The assessments in Parts A through D include where appropriate the following:

- < summary statements regarding the data and analysis at time of plan adoption
- < identification of changes in conditions described in the element since plan adoption including current conditions
- < provision of a new existing land use map
- < provision of a new table of existing land uses
- < provision of a new existing traffic circulation map
- < a summary of the condition and quality of all natural resources
- < identification of changes made to the element since adoption of the plan including background information, map changes and amendments to adopted maps and text (see Appendix 1)
- < identification of problems specifically listed in Rule 9J-5.0053(6)(a)4.a.-o.(each element will not include all items listed in a.-o., see Appendix 2)
- < identification of other unanticipated and unforeseen problems and opportunities and their impact on the comprehensive plan
- < statements regarding the effect on the comprehensive plan of changes to the State Comprehensive Plan, Strategic Regional Policy Plan, Rule 9J-5, F.A.C., and Chapter 163, Part II, F.S.
- < identification of any needed actions to address the issues raised in this section including provision of new, revised, minimum 5-year and minimum 10 year time frames and population projections; updated population projections; new and revised goals, objectives, and policies;

revised future conditions maps; new capital improvements element; new monitoring and evaluation procedures; and studies to be completed

**A. Background Document** - Section 9J-5.015, F.A.C., was amended extensively in March 1994. The element has not been revised relative to the amended section. According to DCA's Summer 1998 issue of *Community Planning* the County is not required to submit proposed plan amendments until October, 1999, pursuant to the requirements of s. 163.3187(1), F.S.

**Summary and Introduction** - The summary provides statements as to why cooperation among governmental entities is necessary. It states that Putnam County has interlocal agreements with various governmental units and the Intergovernmental Coordination Element contains interlocal agreements required by the other elements of the Plan. The introduction stresses the need for intergovernmental coordination for efficient operation, and lists the purpose of the Intergovernmental Coordination Element:

- to identify the governmental relationships both within and outside the county;
- to depict the impact, if any, that the Comprehensive Plan will have on these governments;
- to establish procedures that will ensure continued cooperation and coordination.

*Recommendation - Combine the summary with the introduction.*

**Existing Conditions** - The section lists the population of the County and its form of county government at the time of Plan adoption. The section lists the municipalities within the County and their populations and the counties bordering Putnam County. The section also presents the school boards, other units of local government, water management districts, regional planning agencies and state agencies, authorities, regional agencies and utility companies which provided service within Putnam County at the time of Plan adoption. The Section further summarizes the existing coordination mechanisms for each entity listed above indicating the subject and nature of the relationship, the office with primary responsibility for coordination, and the effectiveness of the coordination mechanisms. None of the data has been updated.

*Recommendation - The information listed in this section must be updated to reflect current conditions. The agreement summaries should continue to list the involved parties and the general responsibilities of the parties. The summaries should also include the term or expiration date of the agreement.*

**Analysis of Need** - This section is an introductory statement for the Problems and Needs in the Comprehensive Plan Elements section.

*Recommendation - Combine with the Problems and Needs in the Comprehensive Plan Elements section.*

**Problems and Needs in the Comprehensive Plan Elements** - This section analyzed the effectiveness of the coordination mechanisms and identified specific problems and needs within each of the Comprehensive Plan elements that would benefit from improved or additional intergovernmental coordination at the time of Plan adoption. The section has not been updated.

*Recommendation - The problems and needs listed need to be examined to determine if they still exist or if other problems exist, and if so, the problems must be corrected.*

**Proposed Growth and Development in the Surrounding Areas** - This section gives a general description of the surrounding county's land uses. The section concludes that the neighboring counties continue the same land use patterns as found in the Putnam County, and therefore, the continuation of the present development patterns should be no reasons for conflict over land uses between Putnam County and any of the other counties.

*Recommendation* - A current inventory of the land uses of neighboring counties must be completed to verify if existing and future land use are compatible. Any incompatible uses identified need to be corrected.

**Comparison with CRPP** - This section simply stated the comprehensive plan was reviewed to the CRPP and growth and development in the County are considered consistent with the CRPP. The CRPP has been replaced by the Strategic Regional Policy Plan (SRPP).

*Recommendation* - review all changes for consistency with the SRPP and remove any references to the CRPP in the Goals, Objectives and Policies.

**Areas of Critical State Concern** - Putnam County contained no areas of Critical State Concern at the time of Plan adoption.

*Recommendation* - This requires no change as the County still has no areas of Critical State Concern.

**B. Goals, Objectives and Policies** -Section 9J-5.015, F.A.C., was amended extensively in March 1994. The element has not been revised relative to the amended section. According to DCA's Summer 1998 issue of *Community Planning* the County is not required to submit proposed plan amendments until October, 1999, pursuant to the requirements of s. 163.3187(1), F.S. Changes to Sec. 163.3177(6)(a), F.S. require the identification of land uses in which public schools will be an allowable use. The County's FLU and Intergovernmental Coordination elements will need to be amended to incorporate this change. The Goals, Objectives and Policies have not been amended since adoption in 1991.

*Recommendation* - The intergovernmental coordination element must be revised after an analysis of the all elements of the Comprehensive Plan, the SRPP, and the State Comprehensive Plan to make sure that there are agreements that satisfy the Plans and the requirements set forth in Chapter 163.3177(6)(h) FS and 9J-5.015 FAC. By October 1, 1999, the County will amend the Intergovernmental Coordination Element to include objectives and policies to coordinate the Comprehensive Plan with the plans of the School Board and other units of local government providing services but not having regulatory authority over the use of land. The Element shall also be amended to describe joint processes for planning and decision making on population projections and public school siting, the location and extension of public facilities subject to concurrency, and siting facilities with countywide significance, including locally unwanted land uses whose nature and identity are established in an agreement. Within one year of adopting the Intergovernmental Coordination Element the County shall establish by interlocal or other formal agreement executed by all affected entities, the joint process consistent with their adopted intergovernmental coordination elements.

**C. Adopted Figures (Maps)** - There are no adopted maps in the Element.

**D. Adopted Tables** - There are no adopted tables in the Element.

## II. Achievement of Intergovernmental Coordination Objectives

Section 9J-5.0053(6)(a)3 of the Florida Administrative Code requires the County to complete an analysis to determine whether or not the objectives adopted in the County's Comprehensive Plan were achieved between December 1991 and June 1999. Below is an analysis of the Intergovernmental Coordination Element objectives. Under each objective is a statement indicating what measure should be used to determine whether or not the objective has been achieved, a status statement regarding what has been done to meet the objective, and a recommendation to retain, amend or delete the objective. Following the analysis of the objective, each policy under the objective is analyzed. The analysis includes a recommendation to retain, amend or delete the policy, and statements regarding how the policy has been implemented.

Section 9J-5.015, F.A.C., was amended extensively in March 1994. The element has not been revised relative to the amended section. According to DCA's Summer 1998 issue of *Community Planning* the County is not required submit proposed plan amendments for a revised Intergovernmental Coordination Element until October 1999, pursuant to the requirements of s. 163.3187(1). The objectives and polices should be revised to make it clear in the objectives that the County is to maintain agreements with specific entities for a clear purpose. The policies should be specific as to what the County will provide to the other entities and what the County expects from the other entities.

**GOAL G.1** [9J-5.015(3)(a)]: Improve coordination between Putnam County and adjacent local governments and local, regional and state agencies in order to coordinate all development activities, preserve the quality of life, and maximize use of available resources.

**Objective G.1.1** [9J-5.015(3)(b)1, 2]: Upon Plan adoption, Putnam County shall ensure that the County, through its Land Development Regulations, continues to coordinate its Comprehensive Plan with the plans of the County School Board and other units of the County which provide service but do not have regulatory authority over the use of land.

***Measure:** Existence of interlocal agreements with the School Board and any other units of the County which provide services but do not have regulatory authority over the use of land.*

***Status:** According to Administration, Putnam County does not have an interlocal agreement with the school board. No other such interlocal agreements exist with any other agency. However, Putnam County does participate in project/program application reviews as part of the regional intergovernmental clearinghouse review system. The NEFRPC acts as the Regional Clearinghouse for IC&R Review. The draft land development code, to be adopted prior to EAR amendments, includes sections which implement this objective.*

***Recommendation:** Amend Objective G.1.1 to delete "upon Plan adoption" and "continues to", to name the other units of the County which provide services but do not have regulatory authority over the use of land, and to add the rest of the 9J-5.015(3)(b)1 listed groups.*

**Policy G.1.1.1** [9J-5.015(3)(c)1]: Upon Plan adoption, the County Planning, Zoning and Building Department shall review School Board and other Agency plans for the coordinating of these plans with specific elements of the County Comprehensive Plan.

*Amend Policy G.1.1.1 to delete "upon Plan adoption", and to include other counties and municipalities. As Administration reported in response to objective G.1.1, Putnam County does not have an interlocal agreement with the school board. No other such interlocal agreements exist with any other agency. However, Putnam County does participate in project/program application reviews as part of the regional intergovernmental clearinghouse review system. The NEFRPC acts as the Regional Clearinghouse for IC&R Review. The County's development review procedures address this policy. The draft land development code, to be adopted prior to EAR amendments, includes sections which implement this policy.*

**Policy G.1.1.2** [9J-5.015(3)(c)5]: Upon Plan adoption, the County shall establish agreements with Crescent City, Interlachen, Palatka, Pomona Park and Welaka, whereby the local governments notify each other and have the opportunity to review development orders which are near or adjacent to each others' corporate boundaries.

*Amend Policy G.1.1.2 to delete "upon Plan adoption", and to add the 7 adjacent counties. Existing agreements do not address this type of notification, however, the County's development review procedures address this policy. The draft land development code, to be adopted prior to EAR amendments, includes sections which implement this policy.*

**Policy G.1.1.3:** Upon Plan adoption, the County shall develop interlocal supportive partnerships with the County's municipalities to identify and implement programs for providing housing for low and moderate income households.

*Amend Policy G.1.1.3 to delete "upon Plan adoption". The background information indicates there is an agreement with Palatka Housing Authority. Administration concurs and reports that Putnam County entered into an interlocal agreement with the Palatka Housing Authority on March 25, 1986, on a perpetual basis, for the provision of low and moderate income housing within the County. The County and PHA are still operating under this interlocal agreement, no amendments have been made to said agreements. Putnam County has developed interlocal supportive partnerships with the Town of Welaka and Crescent City. No interlocal agreements exist with the County's municipalities. Add a reference to indicate that policy G.1.1.3 will be identical to Policy C.1.1.3 once Aupon plan adoption is removed.*

**Objective G.1.2** [9J-5.015(3)(b)1]: Upon Plan adoption, Putnam County shall continue to maintain coordinating relationships with adjacent local governments to ensure the compatibility of adjacent land uses and the preservation of wildlife and plant habitats.

**Measure:** , The number of identified inconsistent land uses and preservation of wildlife and plant habitats.

**Status:** The County's development review procedures address this objective. Administration reports that at this time there are no interlocal agreements with 5 municipalities in the County and 7 adjacent counties for the purpose of plan and development review but that this policy should remain. The County is currently addressing a mechanism to develop relationships with adjacent local governments

*in their draft land development code, to be adopted prior to EAR amendments, includes sections which implement this objective. In addition, the County will add a policy under this objective to establish a mechanism into interlocal agreements with the 5 municipalities in the County and 7 adjacent counties for the purpose of plan and development review, and preservation of wildlife and plant habitat.*

**Recommendation:** Amend Objective G.1.2 to delete upon Plan adoption and continue to.

**Policy G.1.2.1** [9J-5.015(3)(c)1]: The Putnam County Planning, Zoning and Building Department shall review proposed land use activities (land use amendments/rezonings) proposed by Putnam's municipalities and adjacent counties that impact Putnam County land uses and provide comments and recommendations to the land use change process.

*Amend Policy G.1.2.1 to include other examples of land use actions in addition to land use amendments/rezonings. . The Putnam County Planning, Zoning and Building Department reviews all notification received from neighboring governments, however, not all cooperate with County review procedures . The County will add a policy to establish a mechanism to enter into interlocal agreements with the 5 municipalities in the County and 7 adjacent counties for the purpose of plan and development review.*

**Policy G.1.2.2** [9J-5.015(3)(c)2]: Upon Plan adoption, Putnam County shall establish formal procedures for using the Regional Planning Council auspices in resolving conflicts with neighboring jurisdictions regarding land use and the protection of natural resources. The County will participate in RPC-sponsored workshops relating to land planning. Upon Plan adoption, the County shall establish "Memoranda of Agreement" with the County municipalities and other adjacent local governments to arbitrate the siting of "Locally Undesirable Land Uses" (LULUs) within two miles of the shared jurisdictional boundary and implement procedures for reviewing such cases.

*Amend Policy G.1.2.2 to delete "upon Plan adoption", to make it clear what form of agreement and type of coordination is required with the RPC, for services such as alternative dispute resolution, and to delete the last sentence as it is repeated in Policy G.1.2.4. Commitment to use the RPC alternative dispute resolution process may require agreements with other adjacent local governments to ensure their participation. The County's development review procedures address this policy. The draft land development code, to be adopted prior to EAR amendments, includes sections which implement this policy.*

**Policy G.1.2.3** [9J-5.015(3)(c)4]: Putnam County shall continue to comply with State procedures in all annexation activities.

*Retain Policy G.1.2.3. Administration reports that no interlocal agreements currently exist with municipalities delineating the County's role in the process. The County will add a policy to establish a mechanism to enter into interlocal agreements with the 5 municipalities in the County and 7 adjacent counties for the purpose of plan and development review pertaining to all annexation activities.*

**Policy G.1.2.4:** The County shall establish "Memoranda of Agreement" with the

County municipalities and other adjacent local governments to arbitrate the siting of "Locally Undesirable Land Uses" (LULUs) within two miles of the shared jurisdictional boundary and implement procedures for reviewing such cases.

*Retain Policy G.1.2.4. According to Administration, no Memorandum of Agreement exists with the 5 municipalities in the County, two municipalities within 2 miles of the County, and the 7 adjacent counties for the purpose of arbitrating the siting of locally undesirable land uses. Add a date by which the County will update or establish Memorandum of Agreements with County municipalities and other adjacent local governments to achieve this policy. County's development review procedures address this policy. The draft land development code, to be adopted prior to EAR amendments, includes sections which implement this policy.*

**Objective G.1.3** [9J-5.015(3)(b)2]: Putnam County shall adopt Land Development Regulations which ensure that the County establishes procedures to coordinate its Comprehensive Plan and proposed amendments thereto with adjacent local government plans.

**Measure:** *Existence of interlocal agreements with 5 municipalities in the County and 7 adjacent counties for the purpose of comprehensive plan amendment review.*

**Status:** *There are no agreements with adjacent governments to include them in the County's comprehensive plan amendment process. County's development review procedures address this objective. The draft land development code, to be adopted prior to EAR amendments, includes sections which implement this objective.*

**Recommendation:** *Amend Objective G.1.3 to make proper reference to the land development code, and to apply to only comprehensive plan amendments. Consider combining the objective and its policies with Objective G.1.1 and its policies.*

**Policy G.1.3.1** [9J-5.015(3)(c)5]: The County, through the County Planning, Building and Zoning Department, shall review and coordinate the elements of its Comprehensive Plan with the Plans and amendments of the County's municipalities.

*Amend Policy G.1.3.1 to include neighboring counties as they are also adjacent local governments. The County's development review procedures address this policy. No formal agreements have been made. The draft land development code, to be adopted prior to EAR amendments, includes sections which implement this policy.*

**Policy G.1.3.2** [9J-5.015(3)(c)7]: The County Planning, Building and Zoning Department shall provide potentially affected adjacent local governments with copies of proposed amendments to the comprehensive plan and notices for meetings to consider the amendments and will request that adjacent local governments provide the same.

*Retain Policy G.1.3.2. This exchange of notices and information should be made a part of agreements with adjacent local governments. Putnam County currently notifies adjacent governments of proposed amendments. No formal agreements have been made. The draft land development code, to be adopted prior to EAR amendments, includes sections which implement this policy.*

**Objective G.1.4** [9J-5.015(3)(b)3]: Upon Plan adoption, the County shall ensure coordination of adopted levels of service with the state, regional or local entities which have operational and maintenance responsibility for such facilities.

**Measure:** *Adopted levels of service maintained.*

**Status:** *According to Administration Putnam County has two grant agreements with DEP, one for \$900,000 and the other for \$750,000 for the East Palatka Water/Sewer plant, and two grant agreements with the SJRWMD for the same project. No agreements with FDOT, DOH, or municipalities. The County's development review procedures address this policy. The draft land development code, to be adopted prior to EAR amendments, includes sections which implement this policy.*

**Recommendation:** *Amend Objective G.1.4 to delete "Upon plan adoption".*

**Policy G.1.4.1** [9J-5.015(3)(c)1]: Putnam County shall continue to rely on the HRS local office for the permitting and inspection of private wells and septic tanks. Any deficiencies or violations found by HRS will be corrected by the owner of the facility.

*Amend Policy G.1.4.1 to change name of HRS to DOH. The background document mentions a septic tank agreement. According to Administration, septic tank permits are issued from DOH and Ordinance 90-28 is in effect. Public Works suggests that the final sentence of this policy is a given and could be deleted, however, NEFRPC staff feels it does not detract from the overall policy and serves to identify the party responsible for correcting deficiencies found by DOH and should therefore be retained. The County's development review procedures address this policy. The draft land development code, to be adopted prior to EAR amendments, includes sections which implement this policy.*

**Policy G.1.4.2** [9J-5.015(3)(c)1]: Putnam County shall continue to rely on the state DER for the permitting and inspection of potable water and sanitary sewer treatment plants. Any deficiencies or violations found by DER will be corrected by the owner of the facility.

*Amend Policy G.1.4.2 to change name of DER to DEP. The County's development review procedures address this policy. The DOH issues permits based on suitability, permit under Ord. 87-2, do site evaluation., PB&Z does final inspections of well driller's log (pump size, grout depth, well depth, etc.), electrical, plumbing code gives authority. Public Works suggests that the final sentence of this policy is given and could be deleted, however, NEFRPC staff feels it does not detract from the overall policy and clarifies identifies the party responsible for correcting deficiencies found by DEP and should therefore be retained. The draft land development code, to be adopted prior to EAR amendments, includes sections which implement this policy.*

**Policy G.1.4.3** [9J-5.015(3)(c)1]: Putnam County shall continue to review adopted plans and programs of the FDOT relating to the construction and maintenance of state roads and associated drainage facilities which meet the requirements of state regulations and the LOS identified in the County Comprehensive Plan Drainage Sub-Element and Traffic Circulation Element. The County Public Works and

Planning Departments shall participate in FDOT 5-year construction program workshops to further County interests.

*Retain Policy G.1.4.3. Planning staff participates in reviews of FDOT plans but has limited involvement with the 5-year plan. Public Works states that they are actively involved in the review of the plans and programs, including the 5 year TIP, and road and associated drainage construction and maintenance plans, and the existence of an agreement with FDOT regarding coordinated reviews.*

**Policy G.1.4.4** [9J-5.015(3)(c)1]: Putnam County, on an annual basis, shall review its agreement to provide recreational facilities and the maintenance thereof within the City limits of Palatka and Crescent City.

*Amend Policy G.1.4.4 to include all 5 municipalities as there is some form of cooperation in providing funding for facilities and/or programs. The Recreation Department has stated that the County has interlocal agreements with all municipalities and the school board.*

**Policy G.1.4.5** [9J-5.015(3)(c)1]: Upon initiation by the County's municipalities, Putnam County shall negotiate with the County's municipalities agreements to provide those local governments with a reasonable level of cubic yard disposal space within the County landfills.

*Retain Policy G.1.4.5. The Solid Waste Department stipulates that this policy is implemented through interlocal agreements with the 5 municipalities in the County.*

**Policy G.1.4.6** [9J-5.015(3)(c)3]: Putnam County shall coordinate with state agencies and County municipalities in providing information to its respective residents regarding the conservation of water resources and the disposal of hazardous waste.

*Retain Policy G.1.4.6. This policy should be retained. Many programs exist within the County that provide information to residents on conservation of water resources and disposal of hazardous waste. The Solid Waste Department sponsors a Haz-Mat Roundup once per year for homeowners and small quantity generators where Household Hazardous Waste (HHW) is collected, packaged and disposed of by a certified handler. This program is advertised by fliers, radio and newspaper promotions. The DOH requires annual operating permits of Onsite Sewage Treatment and Disposal Systems serving businesses which may be small quantity generators and exempt small quantity generators. SQG/Fire Inspector should coordinate efforts with DOH. The Putnam County Fire Marshall should pursue an ordinance requiring permitting for inspection the installation of underground and aboveground petroleum storage tanks systems for compliance with building setbacks, fire suppression systems, electrical systems, etc. Administration reports that the individual departments such as DOH and the Sanitation Department coordinate public information pertaining to conservation of water and disposal of hazardous waste. The SJRWMD produces several brochures that are available to the public which contain water conservation information. DEP has reported that information regarding the conservation of water resources and hazardous waste can be*

obtained by contacting their Environmental Education Department (850) 488-9334 or by contacting the North East District Office at (904) 448-4300.

**Policy G.1.4.7:** The County shall coordinate with the Department of State, Division of Historic Preservation to establish programs for surveying County sites of potential historical significance.

*Retain Policy G.1.4.7. According to DHR no such program exists but DHR recommends that the County contact DHR to seek grants which can help accomplish this policy.*

**Objective G.1.5** [9J-5.007(3)(b)3; ]: Putnam County shall coordinate with related local, state, regional, and federal agencies for an integrated, cost effective transportation program.

**Measure:** *Method exists for coordinating a transportation program with local, state, regional and federal agencies.*

**Status:** . *The Public Works Department reports that they actively coordinate with local, state, regional and federal agencies in areas related to cost effective transportation programs.*

**Recommendation:** *Retain Objective G.1.5.*

**Policy G.1.5.1:** The County Public Works Department shall establish a regular review of roadway improvement programs before approval of the final annual capital improvements plan between the County and surrounding counties and municipalities within Putnam County and the Florida Department of Transportation to ensure effective application of available revenue.

*Retain Policy G.1.5.1. Public Works states that they are actively involved in the review of the plans and programs, including the 5 year TIP, and road and associated drainage construction and maintenance plans, and the existence of an agreement with FDOT regarding coordinated reviews. Through ongoing correspondence with Public Works more information is anticipated regarding a County coordinated review of roadway improvement programs with surrounding counties, municipalities within the County, , surrounding counties and municipalities within the County prior to the preparation of EAR amendments.*

**Policy G.1.5.2** [9J-5.007(3)(c)1; ]: Although the County is located outside the limits of any Metropolitan Planning Organization, intergovernmental coordination with MPOs and resource planning pursuant to Chapter 380 in north Florida shall be accomplished through continued cooperation and communication with the Northeast Florida Regional Planning Council and other contiguous councils when and where appropriate.

*Amend Policy G.1.5.2 to make it clear what type of coordination is taking place between the RPC and the County. DRI reviews under Chapter 380 are coordinated by the Regional Planning Councils. The NEFRPC has coordinated 3 DRI and 2 DRI amendment reviews in Putnam County in the past 8 years.*

Non Applicable Items

9J-5.015(3)(c)6

Putnam County is not required to prepare a Coastal Management Element to its Comprehensive Plan.