MEMORANDUM

To: Council Members

From: Staff

Date: December 12, 2014 Council Meeting

Subject: Local Government Comprehensive Plan Review

Draft Amendment to the City of Fellsmere Comprehensive Plan

Amendment No. 14-2ESR

Introduc
tion

The Community Planning Act, Chapter 163, Florida Statutes, requires that the Treasure Coast Regional Planning Council (TCRPC) review local government comprehensive plan amendments prior to their adoption. TCRPC comments are limited to adverse effects on regional resources and facilities identified in the Strategic Regional Policy Plan (SRPP) and extrajurisdictional impacts that would be inconsistent with the comprehensive plan of any local government within the Region. TCRPC must provide any comments to the local government within 30 days of the receipt of the proposed amendments and must also send a copy of any comments to the State Land Planning Agency.

The amendment package from the City of Fellsmere includes text changes to the Future Land Use, Conservation, Recreation, and Capital Improvement elements of the comprehensive plan, and a change to the Future Land Use Map Series. This report includes a summary of the proposed amendment and TCRPC comments.

Summary of Proposed Amendment

The proposed amendment is related to the annexation of the Corrigan Ranch by the City of Fellsmere on October 2, 2014. The Corrigan Ranch is an 8,845.19-acre property located adjacent to the southeastern portion of the city. The subject property spans both sides of Interstate 95 (I-95). The amendment proposes to assign City of Fellsmere future land use (FLU) designations as follows:

<table>
<thead>
<tr>
<th>Acres</th>
<th>Current FLU (County)</th>
<th>Propose FLU (City)</th>
</tr>
</thead>
<tbody>
<tr>
<td>7,846.79</td>
<td>Agriculture-1/Agriculture-2</td>
<td>Low Density Mixed Use Neighborhood</td>
</tr>
<tr>
<td>252.22</td>
<td>Agriculture-2</td>
<td>Regional Employment Activity Center</td>
</tr>
<tr>
<td>746.18</td>
<td>Agriculture-2/Industrial</td>
<td>Industrial</td>
</tr>
</tbody>
</table>
The Corrigan Ranch property is currently dominated by grazing lands, citrus groves, row crops, and an extensive coverage of upland and wetland natural systems interspersed throughout the property. The property also has a number of agricultural buildings and a system of ditches and canals to support the existing agricultural operations. The future land use designations on adjacent properties include Conservation-1 (county) and Agriculture-1 (1 unit/5 acres) (City of Fellsmere) to the north; Agriculture-1 (1 unit/5 acres) (county) to the east; Commercial/Industrial (county) and Medium Density Residential-1 (8 units/acre) (county) to the south; and Villages of Fellsmere, Conservation-1 (county), and Agriculture-2 (1 unit/10 acres) (county) to the west. The conservation land adjacent to the north side of the Corrigan Ranch property is the Sand Lakes Conservation Area, a passive recreational park. This is a 1,245-acre tract owned by Indian River County and the St. Johns River Water Management District (SJRWMD). The conservation land adjacent to the west side of the Corrigan Ranch property is the Blue Cypress Water Management Area, which is a 5,807-acre property owned by SJRWMD and comprised of upland and wetland systems.

Proposed Policy FLUE B-22.7 states that the property shall be limited to: 1) a maximum of 1.69 dwelling units per acre calculated over the Low Density Mixed Use Neighborhood acreage within the annexation properties, and 2) a maximum of 12,000,000 square feet (SF) of nonresidential composed of Neighborhood Commercial, Regional Employment Activity Center and/or Industrial uses. The proposed amendment will increase the number of residential units that could be approved on the subject property from 1,144 units under the county FLU designation up to 13,000 units under the city FLU designation. Low Density Mixed Use Neighborhood designated properties are to contain a Village Center, Town Center, or other commercial area to promote a sense of community, provide internal vehicle capture, and serve as year-round gathering places accessible to all residents.

The amendment package from the City of Fellsmere contains a variety of other changes to the comprehensive plan to accommodate the Corrigan Ranch property in the city. These include text changes to policies in the Future Land Use, Conservation, Recreation, and Capital Improvement elements; changes to a variety of maps in the comprehensive plan; and the addition of a site specific objective and supportive policies outlining the development program and limitations on the subject property. The proposed changes to the Fellsmere comprehensive plan are extensive. Therefore, a complete copy of the proposed changes is available as a supplement to this report on Council’s website. Major proposed changes to the comprehensive plan are summarized below:

**Future Land Use Element**

- Revise Policy FLUE A-4.1 to increase Old Town floor area ratio to a maximum of 2.0 and reference Regional Employment Activity Center (Commercial/Industrial) (REAC) areas to be generally located at or near I-95 and/or arterial roadways.

- Revise Policy FLUE B-2.6 to indicate New Low Density Mixed-Use Neighborhood (LDMXN) shall adhere to higher levels of protective covenants and site design guidelines than traditional developments to be approved by the City Council through the Planned Development process.
• Add new Policy FLUE B-4.8 to indicate architectural standards within REAC shall adhere to higher levels of protective covenants and site design guidelines than traditional developments to be approved by the City Council through the Planned Development process.

• Add new Objective FLUE B-22, Corrigan Ranch Ordinance, and 21 supporting policies to guide development of the Corrigan Ranch. These policies indicate that the developing party is required to provide an environmental study and traffic impact analysis prior to the site plan review for each phase of development. Also, these policies indicate that a minimum of 2,000 acres of environmentally sensitive native upland/wetlands shall be preserved, and a minimum aggregate total of 50 percent of the property shall be set aside as open space.

• Revise Figure 1-1A, Future Land Use Map and map series

• Revise Figure 2-1A, Long Range Transportation Map and map series

Conservation Element

• Revise Policy CON A-4.5 to indicate the administration of wetland development restrictions are deferred to applicable federal and state permitting agencies.

• Revise Policy CON A-6.1 to indicate mining activities are allowed on the Corrigan Ranch.

Recreation Element

• Revise Policy REC A-1.1 to indicate the level of service standards for parks and recreation facilities shall be utilized by the city as a guide for capital programming but not a level of service concurrency threshold.

• Revise Objective REC A.7 to adopt by reference the North County Regional Greenways Plan as the Master Greenways Map for the city.

• Add new Policy REC A.7.2 to indicate land acquisition efforts will focus on new linkages, enhancing existing greenways and recreation trail systems, and the acquisition of acreage for destination areas and trailheads.

Capital Improvement Element

• Revise Policy CIE A-5.1 to specify changes in level of service standards for 1) water and sewer from 250 gallons per day to 200 gallons per day; 2) recreation to utilize the developed standards as a guide for capital programming, but not a level of service concurrency threshold; and 3) roadways to eliminate standards for local roads.
- Revise Policy CIE B-1.2 to acknowledge that internal comprehensive plan consistency can be obtained for future land use amendments by providing the required public facilities to accommodate the increased density/intensity within the future land use amendment.

Extrajurisdictional Impacts

TCRPC requested comments from local governments and organizations expressing an interest in reviewing the proposed amendment on November 13, 2014. Staff from the Indian River County Community Development Department provided comments on the proposed amendment, which are included in an attached letter. The letter requests that the city provide clarification regarding several issues related to population estimates, traffic analysis, and proposed infrastructure improvements associated with the Corrigan Ranch amendment. The county staff letter also identifies the need for several revisions and corrections related to the interconnection of water and sewer service between the city and county; permitted water withdrawals capacity for the county; the county’s water supply standard; permitted wastewater supply allocation for the county; and water and sewer infrastructure needs to be installed. Other key comments contained in the county staff letter are summarized below:

- Given the high maximum amount of non-residential building area allowed under the amendments as proposed, significant infrastructure would be required to support that amount of development and mitigate significant impacts likely to occur.

- As currently proposed, there do not seem to be any alternative east-west routes identified in the comprehensive plan amendment.

- To accurately address future traffic demand, more information is needed regarding the trip generation and internal capture rates, and generation-attraction distribution assumptions used in the Kimley-Horn traffic model and study.

- Consideration should be given to having the developer extend 26th Street west of 82nd Avenue, on the north side of the Indian River Farms ditch/canal, and connecting that extension into the Corrigan Ranch roadway system.

- Within the Corrigan Ranch property, consideration should be given to establishing a denser network of north/south and east/west connecting through streets. Such a network grid system will provide increased mobility choices and provide additional roadway capacity.

- Consideration should be given to adopting a policy requiring a greenbelt to be established on the perimeters of the Corrigan Ranch property that are adjacent to agriculturally designated and conservation properties that lie within the unincorporated area.
Regional Impacts

The proposed amendment has the potential to impact several regional resources and facilities identified in the SRPP. These include the regional roadway network and natural resources of regional significance. Components of the regional roadway network that could potentially be adversely impacted by the proposed amendment include I-95, State Road 60, and County Road 512. The letter from Indian River County and discussions with staff from the Florida Department of Transportation (FDOT) indicate that the traffic analysis submitted as part of the amendment package does not accurately measure future roadway impacts. The city should coordinate with Indian River County and FDOT in conducting a reanalysis of the impacts to the regional and local roadway network.

The existing configuration of natural systems on the Corrigan Ranch property offers an opportunity to provide a significant greenway connection from the Blue Cypress Water Management Area to the Sand Lakes Conservation Area. There are opportunities to protect and restore large areas of the existing natural systems occurring on the property by directing future development to portions of the property that have been previously cleared for agricultural operations. Also, there is an opportunity within a properly planned and interconnected system of greenways and natural areas to better address the new water management and storage demands that will be created as the ranch develops. While new Policy FLUE B-22.19 requires the developing party to submit a master conservation and greenways/trails plan prior to or as part of the initial residential development process, this may not result in the optimal design for the protection and enhancement of natural resources. Prior to planned development of the site, the city should coordinate with Indian River County, SJRWMD, and Florida Fish and Wildlife Conservation Commission (FWC) to develop a system of master planned greenways and preserve areas to: 1) better protect and enhance natural resources; 2) more naturally and efficiently address water management needs; and 3) help establish a logical pattern of developable areas on the project site.

Advisory Recommendations Related to Town Planning and Urban Design

The City of Fellsmere has a strong vision and high aspirations for its future. At the same time, the city is aware that its vision for future growth needs to be carried out in a manner that does not adversely impact regional resources and facilities and the quality of life of citizens in nearby communities and jurisdictions. In order to accomplish this, the city should consider: 1) how the arrangement and organization of development on the property can be improved and refined; 2) how its relationship and transportation interconnectivity to the surrounding areas can be strengthened; 3) whether there will be adequate public facilities and infrastructure to support the development; 4) how the development can enhance water quality, water management, and environmental restoration efforts in the area; and 5) whether the ultimate plan of development will lead to a built environment sophisticated enough to accomplish these and other local and regional objectives.

The form, location, balance, mix and organization of the built and natural environment has a direct impact on whether the region can accomplish its goals and sustain a high quality of life for its citizens. For example, urban form and development patterns have a profound regional effect on: 1) how often and how far we drive; 2) how much energy we use; 3) how long and well the
regional roadway network will function; 4) how much air and water pollution we generate; 5) how feasible and cost-effective public transit will be; 6) how much of the public must spend on public facilities and infrastructure; 7) how much land and water we consume; 8) the extent to which upland and wetland systems are impacted; 9) whether there is an adequate supply of affordable housing; 10) how successful we are at infill and redevelopment of our established towns and cities; 11) how competitive we are in attracting business and economic development; 12) the region’s ability to minimize crime and emergency response times; 13) how much public money we have to spend on education and care of the elderly and children; 14) how well we respond and recover from natural disasters; 15) how successful we are in implementing the Comprehensive Everglades Restoration Plan and restoring the Indian River Lagoon, St. Sebastian River, and Upper St. Johns River Marsh; and many other important regional issues and concerns.

With more detailed land use planning in advance, the city has a better chance of: 1) ensuring it takes advantage of large scale natural resource protection, greenway, and water management opportunities; 2) controlling and mitigating regional and local impacts; and 3) accomplishing regional goals and objectives related to the subject areas outlined above. The city is encouraged to do more detailed land use planning for the site so that development impacts can be better understood, planned for, and controlled. Perhaps the city and landowner should consider the sector planning process as a tool to facilitate land use planning in cooperation with surrounding jurisdictions and permitting agencies.

Conclusion

The proposed amendment has the potential to impact the regional roadway network and natural resources of regional significance. The city should coordinate with Indian River County, FDOT, SJRWMD, and FWC to establish a program to avoid and mitigate impacts to regional resources and facilities and develop a system of greenways and preserve areas to protect and enhance natural resources on the project site. In order to maximize the benefit of the natural systems for wildlife, water management, and recreational use, the city should identify natural resource preserve areas on the entire site prior to approving plans for development of the site. The natural resource protection areas should include a significant greenway connection from the Blue Cypress Water Management Area to the Sand Lakes Conservation Area. The city is also encouraged to undertake more detailed large-scale land use planning for the site so that development impacts can be better understood and addressed comprehensively. Council staff is available to assist the city in coordinating and developing plans to address regional issues related to the proposed amendment. Additionally, the city should coordinate with Indian River County to make the necessary corrections and address any further revisions based on the county’s comments related to water and wastewater issues, transportation, and other issues raised in the attached letter.

Recommendation

Council should approve this report and authorize its transmittal to the City of Fellsmere and the Florida Department of Economic Opportunity.

Attachments
## List of Exhibits

<table>
<thead>
<tr>
<th>Exhibit</th>
<th>Description</th>
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<tbody>
<tr>
<td>1</td>
<td>General Location Map</td>
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<tr>
<td>2</td>
<td>Corrigan Ranch Location Map</td>
</tr>
<tr>
<td>3</td>
<td>Corrigan Ranch Aerial Photo</td>
</tr>
<tr>
<td>4</td>
<td>Current Future Land Use Map</td>
</tr>
<tr>
<td>5</td>
<td>Proposed Future Land Use Map</td>
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<tr>
<td>6</td>
<td>Adjacent Land Use Map</td>
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<tr>
<td>7</td>
<td>Current Long Range Transportation Plan Map</td>
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<tr>
<td>8</td>
<td>Proposed Long Range Transportation Plan Map</td>
</tr>
<tr>
<td>9</td>
<td>New Objective FLUE B-22, Corrigan Ranch Ordinance and Policies</td>
</tr>
<tr>
<td>10</td>
<td>Indian River County Staff Comments from the Community Development Department</td>
</tr>
</tbody>
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Exhibit 3
Corrigan Ranch Aerial Photo
Exhibit 7
Current Long Range Transportation Plan Map

Legend:
- Truck Route
- Multi-use Trail
- 2-Lane County Arterial
- 4-Lane County Arterial
- 2-Lane City Arterial
- 3-Lane County Arterial
- Elementary School
- Middle School
- High School
- Water Access Node
- Water/Sewer Treatment Facility
- Existing Interchange
- Future Interchange
- Local Access Connections

Note: All roadways shall maintain minimum levels of service in accordance with the Comprehensive Plan.

Long Range Transportation Plan
Figure 2-1A

Adopted 10/11/07, Ord 07-08; Revised 7/17/14, Ord. 2014-08

July 15, 2014
Exhibit 8
Proposed Long Range Transportation Plan Map
Objective FLUE B-22: CORRIGAN RANCH Ordinance (AMENDMENT 14-02, ADOPTED ON JANUARY 15, 2015): The amendment to the Comprehensive Plan Future Land Use Maps as requested by HUGH CORRIGAN III FAMILY LIMITED PARTNERSHIP, LLP, a Florida limited liability limited partnership, J. PAT CORRIGAN FAMILY LIMITED PARTNERSHIP, LLP, a Florida limited liability limited partnership, ELEANOR CHRISTIE CORRIGAN, HUGH CORRIGAN, IV, HUGH DANIELS CORRIGAN, JAMES PATRICK CORRIGAN, JR., PATRICK EDWARD CORRIGAN, and J. PAT CORRIGAN and PATRICIA P. CORRIGAN, husband and wife (hereinafter collectively referred to as “Owner”) is subject to compliance with the following policies, which shall run with the land. The terms “Owner” and “Developing Party” are used in this Objective to note the distinction between the present fee simple owner of the Property, and the party undertaking actual development activities upon the Property in the future. Use of these terms in this manner is intended to: (i) identify the party seeking municipal annexation and performing master planning and future land use functions; and (ii) clarify that the legal duty to comply with the requirements to construct Infrastructure (as herein defined) and the responsibility to develop the Property in accordance with the governing City Comprehensive Plan and Land Development Code is to be borne by the party actually performing physical development activities. The Owner and Developing Party may be the same if the Owner is seeking to develop the Annexation Properties or any portion thereof.

Policy FLUE B-22.1. The Developing Party shall provide an environmental study and traffic impact analysis prior to site plan review for each phase of development.

Policy FLUE B-22.2. The Developing Party shall provide at developer’s expense for the construction of all required public facilities, roadways, turn lanes and utilities improvements, connections and extensions as determined by the City to be needed for the development of the land. All roads needed for the development shall be paved at owner’s/developer’s expense to City, County or State standards, as applicable.

Policy FLUE B-22.3. The Developing Party shall demonstrate prior to each site plan approval that all concurrency provisions have been addressed or met including but not limited to: sanitary sewer, solid waste, drainage, potable water, parks and recreation, and transportation facilities.

Policy FLUE B-22.4. The Developing Party shall enter into a development agreement to provide for payment of fees for or direct construction of public facilities and services demanded by the development.

Policy FLUE B-22.5. The Developing Party is responsible for all costs associated with any new or expanded public facilities and services required to make the project meet concurrency regulations or to provide the proportionate or fair share contributions therefore.
Policy FLUE B-22.6. The Property shall be limited to: (i) a maximum of 1.69 dwelling units per acre calculated over the Low Density Mixed Use Neighborhood acreage within the Annexation Properties and (ii) a maximum of 12,000,000 nonresidential square feet composed of Neighborhood Commercial, Regional Employment Activity Center and/or Industrial uses.

Policy FLUE B-22.7. While there are "lines" on the future land use map series pertaining to Corrigan Ranch, (Maps 1-1A, 1-1B, and 1-1C) delineating areas for different types of land uses and development, further environmental, traffic, survey, and engineering studies may dictate a need to shift those lines to accommodate natural features, topography, existing or planned public or private utilities, transportation networks and other land use needs. Therefore, the lines for an individual category shown on the FLUM may shift as long as the development densities/intensities set forth herein do not change, without triggering the need for a Comprehensive Plan amendment.

Policy FLUE B-22.8. Regardless of the open space requirements that may be required for each future land use designation that may be assigned to the Property, a minimum aggregate total of 50% of the Property shall be set aside as open space. Each of the following uses shall qualify to meet the open space requirement: conservation areas; greenways and trails; all public parks greater than one acre, whether passive or recreational; pervious portions of agricultural land; golf courses; all common open space; all drainage and stormwater management systems; whether conveyance, retention, or detention; upland preserves; and all public institutional property that is donated (not sold); all subject to the reasonable discretion of the City Council through the Land Development Code or conditions imposed as part of the planned development process.

Policy FLUE B-22.9. The Owner shall be allowed to continue all existing agricultural operations and practices under the Indian River County future land use and zoning designations assigned to the property. Nothing contained herein shall prohibit or preclude the use of the Property or any portion thereof for agricultural or agriculture-related purposes.

Policy FLUE B-22.10. The Owner and/or Developing Party shall be permitted to perform commercial mining activities within the Property, subject to procurement of applicable project permits and regulatory approvals.

Policy FLUE B-22.11. A minimum of 2,000 acres of environmentally sensitive native upland/wetland areas shall be preserved.

Policy FLUE B-22.12. The Developing Party shall provide a standby emergency generator with each sewer pump station at proportionate cost to any users.

Policy FLUE B-22.13. The Developing Party shall be required to construct a City-
approved Pedestrian Linkage System.

Policy FLUE B-22.14. The Developing Party shall dedicate without compensation sufficient right-of-way for 90th Avenue, as the same is ultimately determined to be located and configured, as a condition of development of each Planned Development on the east side of Interstate 95 traversed by or adjacent to 90th Avenue as extended.

Policy FLUE B-22.15. The Developing Party shall dedicate without compensation sufficient right-of-way for 53rd Street, as the same is ultimately determined to be located and configured, as a condition of development of each Planned Development on the east side of Interstate 95 traversed by or adjacent to the proposed 53rd Street extension.

Policy FLUE B-22.16. The Developing Party shall provide within areas of the Property assigned the Low Density Mixed Use Neighborhood future land use designation a diverse mix of housing styles, sizes, configurations, costs and locations subject to each use’s market demand limitations.

Policy FLUE B-22.17. To the extent financially and commercially feasible and practical, “Green” building styles and methods shall be encouraged for both residential and non-residential development throughout the Property.

Policy FLUE B-22.18. There shall be no additional mobile/manufactured units, which are licensed/title as such units, allowed on the Property, except for those mobile/manufactured units on the Property as of the date of adoption of Ordinance No. 2014-17.

Policy FLUE B-22.19. The Owner or Developing Party, either prior to or as part of the initial residential development process, shall submit to the City for review and approval a Master Stormwater Plan; Master Transportation Plan, including the 5-10-15 Year Capital Improvement Schedule and a Master Conservation and Greenways/Trails Plan.

A. A Master Stormwater Plan shall be developed for the Property containing information equivalent to a Conceptual Environmental Resource permit from the St. Johns River Water Management District. Alternatively, a Conceptual Environmental Resource permit shall be sufficient to meet the obligations of this section. The Owner acknowledges that the Annexation Properties shall be subject to the City’s stormwater utility.

B. A Master Transportation Plan shall be developed for the Property containing arterial, collector and to the extent practical, local roadways, transit opportunities, and other multi-modal forms of transportation phased commensurate with the impacts of new development. Such plan shall identify connectivity to the existing local, county, and state roadway network. The Master Transportation Plan shall provide the following specific facilities to the extent such access is permissible:

Page 9 of 10
Exhibit "A" to Ordinance 2014-17
a. Interconnection west of Interstate 95 to the private property north of the Annexation Properties;
b. Interconnection east of Interstate 95 to the private property north of the Annexation Properties;
c. Interconnection east of Interstate 95 to a proposed interchange generally along 69th Avenue;
d. Extension of 53rd Street from its terminus to 90th Avenue;
e. Extension of 90th Avenue along the entire frontage of the Annexation Properties;
f. Interconnection west of Interstate 95 to SR60 in at least two locations; and
g. Connection to the proposed interchange with Interstate 95.

C. A Master Conservation and Greenway/Trails Plan shall be developed. Such plan shall show interconnectivity with existing and planned conservation, preserve, active and passive recreation and trails systems on the Property with similar facilities within the City of Fellsmere. The Master Conservation and Greenway/Trails Plan shall provide the following specific facilities to the extent such access is permitable:
a. Incorporation of existing Interstate 95 underpass into overall plan; and

Policy FLUE B-22.20. The City will consider amending its Land Development Code to include provisions for off-site directional signage. Any off-site directional signage that may be allowed shall be at the Developing Party’s expense.

Policy FLUE B-22.21. The Developing Party may implement architectural and site design control mechanisms to govern future development. The City acknowledges that community architectural review committees established by developers serve important community interests and maintain property values.
November 26, 2014

Jason Nunemaker, City Manager
City of Fellsmere
22 S. Orange Street
Fellsmere, FL 32948

RE: County Staff Comments on Proposed Comprehensive Plan Amendments for Corrigan Ranch

Dear Jason:

County Staff has reviewed information the City provided regarding the Corrigan Ranch comprehensive plan amendments, including a traffic impact analysis prepared by Kimley-Horn & Associates. According to that information, the City is considering re-designating ± 8,845 acres from its County agricultural and industrial land use designations to City mixed residential and commercial (LDMXN) and employment/activity center (REAC) land use designations. County staff appreciates the opportunity to review the proposed comprehensive plan amendments, and offers the following comments.

1. The Corrigan Ranch existing and proposed land use designations compare as follows:

<table>
<thead>
<tr>
<th>Under County Designations [AG-1, AG-2, C/I]</th>
<th>Under Proposed City Designations [LDMXN, REAC]</th>
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<tbody>
<tr>
<td>Number of Residential Units</td>
<td>1,144 units</td>
</tr>
<tr>
<td>Commercial Acres</td>
<td>7.26 acres (2% of C/I industrial)</td>
</tr>
<tr>
<td>Industrial Acres</td>
<td>363 acres</td>
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Under the County’s “New Town” comprehensive plan policies (which require submittal of a conceptual Planned Development plan as part of any land use re-designation amendment request), a new town project on the Corrigan Ranch property could be approved for up to 13,000 units and 130 acres of commercial, together with the existing 363 acres of the ranch currently designated C/I for industrial development.

In conjunction with the unit and acreage data described above, the amendments propose allowing up to 12,000,000 sq. ft. of commercial/industrial building area on the Corrigan Ranch property. Together with the Pine Grove (Ansin) project, the FJV project, and existing commercially zoned areas, over 30.6 million sq. ft. of commercially/industrial building area...
will be allowed. Those 12 million sq. ft. and 30.6 million sq. ft. amounts compare to existing commercial/industrial building area as follows:

Existing Countywide including municipalities (2014)............20,609,934 sq. ft.
Existing Fellsmere (2014)........................................198,574 sq. ft.
Proposed Corrigan Ranch (max.)....................................12,000,000 sq. ft.
Proposed Fellsmere (max.)...........................................30,687,956 sq. ft.

Given the high maximum amount of non-residential building area allowed under the amendments as proposed, significant infrastructure would be required to support that amount of development and mitigate significant impacts likely to occur.

2. From 2000-2010, Fellsmere captured about 5% of the county-wide population growth. The Corrigan Amendments needs analysis predicts that Fellsmere will capture about 42% of the currently anticipated county-wide population growth through 2040. With respect to predicted non-residential growth, the needs analysis uses a high residential growth figure, a high commercial sq. ft. per residential unit factor (66% higher than the factor used by the county), and then nearly doubles the calculated non-residential sq. ft. maximum amount to allow for "market" flexibility.

a. Page 14 of the Planning Statement contains the following comment: “Assuming the BEBR projection for 2040 for Indian River County reflects an under-projection by 10%...” The planning statement then assumes 19,370 additional IRC residents over forecast BEBR midrange levels. In Indian River, there is evidence that BEBR has overestimated growth in the past (see table below), while County staff accepts a long-term annual growth rate of 1.4%.

<table>
<thead>
<tr>
<th>Date</th>
<th>BEBR Forecast Year</th>
<th>BEBR Midrange Population Forecast</th>
<th>Actual 2014 Population</th>
<th>Rate of Growth Needed Starting in 2014 to meet Forecast</th>
<th>IRC Historic Rate of Growth</th>
<th>IRC Current Rate of Growth</th>
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<tr>
<td>1993</td>
<td>2020</td>
<td>158,100</td>
<td>139,586</td>
<td>1.77%</td>
<td>1.4%</td>
<td>&lt;1%</td>
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<td>1999</td>
<td>2025</td>
<td>166,200</td>
<td>139,586</td>
<td>1.45%</td>
<td>1.4%</td>
<td>&lt;1%</td>
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<td>2004</td>
<td>2015</td>
<td>151,500</td>
<td>139,586</td>
<td>8.1%</td>
<td>1.4%</td>
<td>&lt;1%</td>
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<td>2004</td>
<td>2030</td>
<td>186,200</td>
<td>139,586</td>
<td>1.8%</td>
<td>1.4%</td>
<td>&lt;1%</td>
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<tr>
<td>2009</td>
<td>2035</td>
<td>208,993</td>
<td>139,586</td>
<td>1.8%</td>
<td>1.4%</td>
<td>&lt;1%</td>
</tr>
</tbody>
</table>

Please identify the 2040 Population Estimate that was used as the basis for the proposed Comprehensive Plan amendment and the reasons for assuming a 10% margin of error on BEBR 2040 Midrange.

b. Multiplying the Households in FJV, Pine Grove, and Corrigan Ranches (38,618 Households) by the Household Occupancy Rate cited in the Planning Statement (2.32) results in a population of 89,594 in 2040 in those areas. Is this the population that was assumed in the Amendment?

3. Please verify that the traffic analysis provided with the Corrigan Ranch amendments accounts for development of the Pine Grove (Ansin) and FJV properties.
4. The traffic analysis indicates that SR 60 between 98th Avenue and I-95, and a segment of CR 512 will be over capacity as 4-lane facilities. What improvements (e.g. 6-laning) or monitoring conditions are recommended to address potential capacity problems for those segments?

5. The traffic analysis indicates that a segment of CR 512 east of I-95 and the proposed 53rd Street extension will need to be six-laned. Does that analysis assume an I-95 interchange or overpass at 53rd Street and at 69th Street? Please verify the interchange and/or overpass improvements needed to meet capacity requirements, and please indicate how such improvements will be funded.

6. In Table 18 on page 26 of 30, the lane limitations indicated for CR 512 are 2, 3, or 4 lanes. Given that the County Thoroughfare Plan designates 200 feet of right-of-way for CR 512 (IRC Code 952.08) and long range plans anticipate building a 4-lane (minimum) or 6-lane divided roadway in the future to handle growth, these lane limitations are unrealistic. As currently proposed, there do not seem to be any alternative east-west routes identified in the comprehensive plan amendments.

7. To accurately assess future traffic demand, more information is needed regarding the trip generation and internal capture rates, and generation-attraction distribution assumptions used in the Kimley-Horn traffic model and study. For example, what trip generation rate was applied for a single-family home? Retail shopping center? Office? Industrial?
   a. What is the Basis for the .94 Model Output Conversion Factor? Staff’s understanding is the GTCRPM is already adjusted for peak season output. Also, much of the County’s transportation analysis is based on peak season data. Also, were there mode split assumptions that further reduced traffic volumes on the network?
   b. There appear to be possible coding errors in the model. The model shows no trips loading on the Centroid Connector linking TAZ 424 – CR 512, but on Figure 3 construction of a 2-lane Arterial is proposed. Road G is shown as having zero traffic south of Road A, but is extended in Figure 3 from north of Road A to the Brevard County Line. Please provide model assumptions and assignments.

8. In Table 4 of the Kimley-Horn study, why was a V/C ratio of 1.15 used in determining when additional lanes are needed?

9. The amendment indicates that, on the east side of I-95, the Corrigan Ranch roadway network will connect to the following east/west roads: 69th Street, 53rd Street, and 33rd Street. Consideration should be given to having the developer extend 26st Street west of 82nd Avenue, on the north side of the Indian River Farms ditch/canal, and connecting that extension into the Corrigan Ranch roadway system.

10. Within the Corrigan Ranch property, consideration should be given to establishing a denser network of North/South and East/West connecting through-streets. Such a network (grid) will provide increased mobility choices and provide additional roadway capacity.
11. Consideration should be given to adopting a policy requiring a greenbelt (environmental, agricultural, recreational, other open spaces uses) to be established on the perimeters of the Corrigan Ranch property that are adjacent to agriculturally designated properties and conservation properties (e.g. Sand Lake tract) that lie within the unincorporated area. Such a policy is contained in the County’s “New Town” and associated TND requirements and ensures land use compatibility.

12. The following comments relate to water and sewer service.

   a. As proposed, the amendments state that an interconnection between the City and Indian River County exists both for water and sewer. That statement needs to be revised to clarify that the current connection exists only for emergency use and that no existing infrastructure will support the subject additional demand.

   b. Table 14 indicates permitted withdrawals capacity for the County that are grossly overestimated. The current Consumptive Use Permit (CUP) which expires in 2031 has a total allocation 12.84 mgd.

   c. Note that the County’s residential water supply standard is calculated on 250 gpd per 1 ERU not 200 gpd as stated in Table 13.

   d. Currently permitted wastewater allocation for the County is 12.85 mgd and not 19.00 mgd as stated on Table 16.

   e. Page 5 (VI) needs to elaborate that the County may have plant capacity, but infrastructure to serve the City is not in place. Also, item VII states that the infrastructure is existing adjacent to the property. Please note that approximately 1.25 to 1.75 miles of infrastructure needs to be installed.

Again, thank you for the opportunity to review the proposed comprehensive plan amendments and provide comments. If you have any questions regarding these comments, please do not hesitate to contact me at 226-1253.

Sincerely,

Stan Boling, AICP
Community Development Director

cc: Wesley S. Davis, Chairman BCC (via e-mail)
    Board of County Commissioners (via e-mail)
    Susan Adams, Mayor Fellsmere (via e-mail)
    Joe Baird, County Administrator (via e-mail)
    Chris Mora, P.E. (via e-mail)
    Chris Kafer, P.E. (via e-mail)
    Vincent Burke, P.E. (via e-mail)
    Arjuna Weragoda, P.E. (via e-mail)
    John King (via e-mail)
    Himanshu Mehta, SWDD (via e-mail)
    Roland M. DeBlois, AICP (via e-mail)
    Sasan Rohani, AICP (via e-mail)
    John W. McCoy, AICP (via e-mail)
    Phil Matson, AICP (via e-mail)
    Brian Freeman, AICP (via e-mail)
    Michael Busha, TCRPC (via e-mail)
    Peter Merritt, TCRPC (via e-mail)
    Brian Good, P.E. Kimley-Horn (via e-mail)