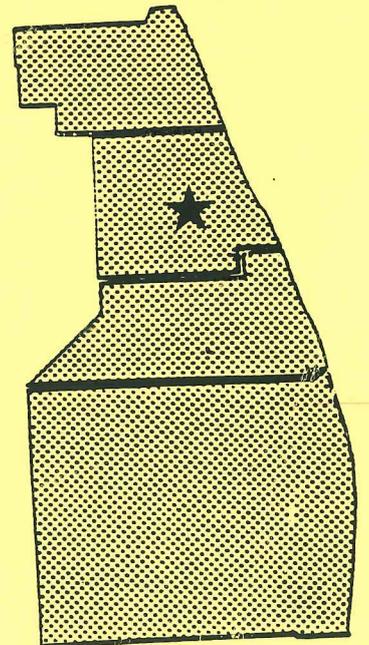


A
DEVELOPMENT
OF REGIONAL
IMPACT

ASSESSMENT
REPORT

LTC RANCH



treasure coast regional planning council

indian river

st. lucie

palm beach

treasure
coast
regional
planning
council

TREASURE COAST
REGIONAL PLANNING COUNCIL
3228 S.W. Martin Downs Blvd., Suite 205
P. O. Box 1529
Palm City, Florida 34990

March 27, 1995

The Honorable Denny Green, Chairman
St. Lucie County Board of County Commissioners
2300 Virginia Avenue
Fort Pierce, FL 34982

Subject: LTC Ranch Development of Regional Impact

Dear Chairman Green:

I am hereby transmitting the report and recommendations adopted by Treasure Coast Regional Planning Council on March 17, 1995 for LTC Ranch Development of Regional Impact. The attached report and recommendations represent the fulfillment of Council's responsibilities as provided for in Section 380.06(12), Florida Statutes.

Should you feel the Council staff can be of any further assistance, please contact me at your convenience. I look forward to receipt of the adopted Development Order as provided for by Section 380.06, Florida Statutes. In turn, St. Lucie County will be notified of the action taken by Council upon its review of the Development Order.

Sincerely,



Michael J. Busha, AICP
Acting Executive Director

MJB:lg

Attachment

cc: Karen T. Marcus, TCRPC Chairman
Ken Sattler, Vice Chairman
Havert L. Fenn, Commissioner
Gary D. Charles, Commissioner
Cliff Barnes, Commissioner

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A DEVELOPMENT OF REGIONAL IMPACT ASSESSMENT REPORT

FOR

LTC RANCH

ST. LUCIE COUNTY, FLORIDA

March 1995

PREPARED BY

TREASURE COAST REGIONAL PLANNING COUNCIL

3228 SW MARTIN DOWNS BOULEVARD

PALM CITY, FLORIDA 34990

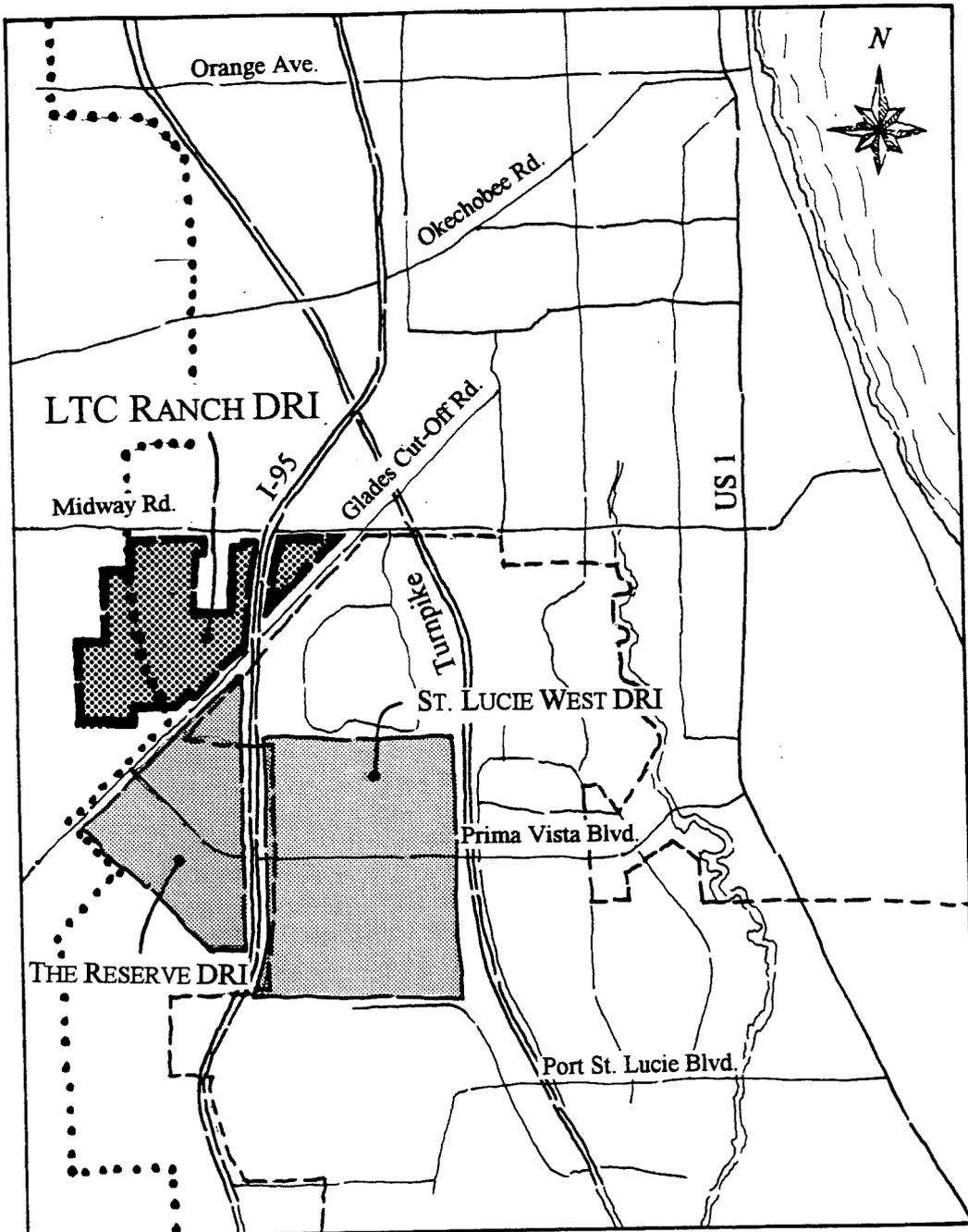
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LTC RANCH DEVELOPMENT OF REGIONAL IMPACT
REPORT AND RECOMMENDATIONS

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The LTC Ranch Application for Development Approval was submitted September 9, 1992, and was supplemented with additional information submitted February 8, 1993; August 16, 1993; and November 10, 1993. On December 20, 1993, the applicant terminated the sufficiency process by declining to submit further information requested by Council, Florida Department of Community Affairs (DCA), Florida Department of Environmental Protection (DEP), and the Florida Game and Fresh Water Fish Commission (FGFWFC). Since termination of the sufficiency process the applicant has furnished Council with a report on subsurface conditions on the project, several draft development orders, and revised potential development scenarios.



LTC RANCH
Map 2

program and trip vesting charts were provided for illustration purposes only.

POTENTIAL DEVELOPMENT PROGRAM:

	PHASE 1	PHASE 2	PHASE 3	TOTAL
<u>Land Uses</u>	<u>(1995-2000)</u>	<u>(2001-2005)</u>	<u>(2006-2020)</u>	
Residential (DU)	1,000	1,500	4,000	6,500
Industrial (SF)	392,040	588,060	980,100	1,960,200
Retail (SF)	90,000	215,000	420,000	725,000
Office (SF)	34,957	314,775	1,158,750	1,508,500

Final development order approval is requested for Phases 1 and 2, conceptual approval is requested for Phase 3.

PROPOSED TRIP VESTING:

	PHASE 1	PHASE 2	PHASE 3
<u>External Trips*</u>	<u>(1995-2000)</u>	<u>(2001-2005)</u>	<u>(2006-2020)</u>
TAZ 78	13,051	19,950	No information supplied
TAZ 117		2,646	No information supplied
TAZ 118		16,432	No information supplied
TOTALS	13,051	39,028	

* Trip numbers represent external daily trips. Trips were assigned to particular TAZs because the applicant felt that presented the worst case scenarios for Phases 1 and 2. Development would not necessarily be limited to the TAZs as shown above. The ADA proposes to furnish the future developer of any parcel within LTC Ranch vesting for a certain number of vehicular trips and vesting from future environmental review if the developer's preliminary development plan for that parcel is consistent with certain upland and wetland habitat preservation conditions. The ADA suggests that all other regional issues can be addressed via DO conditions and through local site plan review processes and ordinances.

**IDENTIFICATION OF
IMPACTS AND
RECOMMENDATION
FOR DENIAL**

SUMMARY OF RECOMMENDATION FOR DENIAL

It is the recommendation of Treasure Coast Regional Planning Council that the LTC Ranch Development of Regional Impact (DRI) Application for Development Approval (ADA) be **DENIED**.

The DRI ADA provides insufficient information to determine: 1) whether development will have a favorable or unfavorable impact on State or regional resources and facilities; 2) whether the development will favorably or adversely affect the ability of people to find adequate housing reasonably accessible to their places of employment; and 3) whether the development will significantly impact adjacent jurisdictions (i.e., the City of Port St. Lucie).

The DRI ADA does not provide a unified plan of development for the property. It does not include: 1) a master plan; 2) commitment to an orderly progression of development across the site; 3) assurance that buildout will yield any given ratio of land uses; 4) a proposed relationship between land uses (e.g., it neither quantifies the mix of uses within a parcel nor describes the physical relationship between uses); or 5) a description or illustration of the method (e.g., road, bike path) of connection from one land use to another.

The DRI ADA and draft development orders circulated by the applicant propose extreme land use flexibility as long as: 1) the uses proposed will not exceed certain vehicular trip caps, wastewater generation caps, or water demand caps; and 2) the proposal being reviewed complies with certain environmental conditions.

The ADA sheds no more light on what the development proposal is for the property than what is described in the County's Mixed Use Development (MXD) land use designation in their local comprehensive plan. In fact, there is nothing contained in the LTC Ranch ADA or St. Lucie County's land use designations or zoning ordinance governing the property that requires or guarantees that a mixed-use project be built.

The LTC Ranch proposal makes it impossible to perform a thorough review of potential regional impacts in the following areas:

1. Housing
2. Transportation
3. Drainage
4. Air Quality, Energy, and Alternative Modes of Transportation
5. Disaster Preparedness and Recovery
6. Education
7. Water Supply

8. Wastewater
9. Parks and Recreation
10. Fiscal Impacts and Concurrency
11. Elderly, Children and Families, and
12. Impacts on Adjacent Jurisdictions

Following is a summary of unresolved concerns associated with the issue areas listed above. A more detailed analysis of the issues is contained in the body of the report along with recommendations on the remedial actions necessary for Council to reconsider the LTC Ranch DRI.

Housing

The location, amount, type, timing of delivery, and affordability of housing to be provided by the project cannot be predicted. This unpredictability is caused by the lack of a master plan and the allowance of land use trade-offs. The lack of information related to the plans for housing is a serious deficiency of the ADA. It prevents Council from complying with the direct statutory charges of assessing the provision of adequate, affordable housing close to places of employment and assessing impacts on adjacent jurisdictions. It also prevents Council from determining consistency with the RCPP and State Plan on a variety of regional issues (see EDUCATION; DISASTER PREPAREDNESS AND RECOVERY; PARKS AND RECREATION; THE ELDERLY, CHILDREN AND FAMILIES; and FISCAL IMPACT AND CONCURRENCY).

The importance of addressing housing issues was recognized specifically in changes to the DRI Statute in 1993 (Chapter 380.06 F.S.). The housing issue has become one of the three main issues specifically identified for regional planning councils to focus on in their review of DRIs.

Transportation

The LTC Ranch traffic analysis was not performed consistent with Council and Florida Department of Transportation (FDOT) policy. The analysis was performed relying on roadway capacity which has already been relied upon by approved development in the area, particularly St. Lucie West and The Reserve DRIs. The analysis does not account for all traffic projected to be generated at buildout by these DRIs or buildout of LTC Ranch beyond Phase 2.

Analyzing LTC Ranch traffic impacts in this fashion is inappropriate as it does not consider the full effect this would have on the ability of St. Lucie West, The Reserve, and other approved development in the area to build out.

The failure to address the full implications of approving such a large amount of development so close to two other

DRIs was in part responsible for the recommendation for denial issued by the FDOT (see FDOT letter at the end of this section). The buildout of already approved projects in the area will require a significant and expensive expansion of the existing roadway network, including the development of new roadway corridors (i.e., West Virginia Drive and Torino Parkway) and new interchanges at Florida's Turnpike and I-95.

Other transportation issues, of regional concern are related to questions about the project's ability to: 1) accommodate future public transit opportunities (see AIR, ENERGY and ALTERNATIVE TRANSPORTATION MODES); and 2) provide for sufficient public access through the project (see PUBLIC RIGHTS OF WAY).

Drainage

The Revised Impact Assessment Report prepared by the South Florida Water Management District (SFWMD) indicates that there is a significant potential for adverse regional impacts (see Appendix A). District staff cannot confirm the applicant's assertion that the DRI could be developed in a manner not likely to produce adverse water resource-related impacts with regard to the surface water management quantity and quality, as well as other water related issues (see WATER SUPPLY).

Because of the lack of specific information for the project, it is impossible to evaluate the proposed drainage system for consistency with the RCPP and the State Plan. It would not be prudent to approve the development of LTC Ranch until it is determined, at least at the conceptual level, that the water management needs of the property in a fully developed state can be accommodated consistent with State, local and regional policy.

Air Quality, Energy and Alternative Modes of Transportation

Because no master plan has been provided for LTC Ranch, it is impossible to determine to what extent the project will: 1) accommodate and encourage alternate transportation modes; 2) minimize energy usage and the Region's dependency on foreign energy sources; 3) address potential air quality concerns in a cost-effective and comprehensive manner; and 4) take advantage of the FEC railway corridor for transportation purposes. Failing to address these issues at the DRI level will make it less likely that favorable resolution of these issues will occur at the local level.

Disaster Preparedness and Recovery

It is likely that many LTC residents will seek shelter outside their homes in the event of a natural or man-made

disaster. The number, location, mix, and type (e.g., mobile homes are a possibility) of residential units are not known for LTC Ranch. Therefore, the demands LTC residents will place on the County's public shelter system cannot be reliably estimated. Currently St. Lucie County (as are all South Florida counties) is operating under deficit shelter conditions and may not have adequate shelter capacity to house the existing at-risk population.

The location of public shelters and the roadway network which serves them affects the ability of citizens to access them safely and efficiently. Public shelters are normally schools and other public or community buildings. The LTC Ranch proposal does not reserve sites for any such buildings and they are not considered in the mix of land uses proposed in the ADA. The LTC Ranch proposal provides no street network for the development and shows only one way in or out of the largest portion of the property. If any segment of this main route becomes blocked during an emergency, evacuation efforts and public safety will be unnecessarily jeopardized. The LTC Ranch proposal fails to address basic disaster preparedness issues.

Education

Improving the performance of students within the Region is a goal of the RCPP. Accomplishing this goal not only benefits the student, but provides the labor market with a more highly educated and skilled labor force. The real and perceived quality of the overall school system has an effect on the power of St. Lucie County and the Region to attract new businesses and major employers. A major factor affecting student performance and school system quality is the availability of safe, comfortable classroom space.

Estimating the number of students the project will generate is impossible. One allowable development scenario would generate enough school age children to require construction of two elementary schools, one half of middle school and one half of a high school. Another allowable scenario would be development of the property in a manner that would generate no school children. The inability to reasonably estimate student population growth hinders the school board's process with the State for planning and budgeting for school sites and permanent facilities (i.e., getting schools built concurrent with demand).

Thoughtful planning of a large area can encourage development of neighborhood schools and reduce the need for busing students to school. This opportunity will be lost without a master plan of development.

Water Supply

The ADA indicates that the City of Port St. Lucie will expand its existing service area to provide LTC Ranch with potable water. It has not been documented whether or not the Port St. Lucie Utility Systems Department (PSLUSD) will be able to provide enough potable water to meet the needs of the existing service area plus the needs of LTC Ranch without developing a new source of raw water. In any case, expansion—of the service area raises questions of consistency with the Regional goal regarding cost-efficient provision of services. While extension of service lines is an expense which can be charged to the area requesting service, it is not the only consideration in cost-effective provision of service. In the past, Port St. Lucie has had to flush stagnant water from lines in areas where too few homes were connected to generate adequate flow. This makes the system expensive to operate and maintain. To the extent that opening residential lands within LTC Ranch slows infill of existing lots, it will exacerbate the existing system's inefficiencies and costs to existing customers.

It is also uncertain if LTC Ranch will be able to obtain enough water on-site to meet its irrigation demand without adversely impacting the wetland preserve areas and other existing users.

Wastewater

Expansion of the wastewater service area raises the same questions regarding cost-efficient provision of services as are raised with expansion of the potable water supply service area.

Parks and Recreation

With a potential Phase 2 population of 6,250, including over 1,000 school age children, LTC Ranch needs to plan for a variety of recreational and gathering places on-site. The ADA does not describe how these places and facilities will be provided in the context of the development. There is no indication of what types of recreational places will be provided, how these public spaces will be located in relationship to residential areas, what population they will serve, and how accessible they will be to various segments of the population. The City of Port St. Lucie recently completed a Master Plan for Parks and Recreation. As a result of this plan, the City will be providing park and recreation facilities in the vicinity of LTC Ranch. Proper park planning within the DRI is necessary to avoid unanticipated impacts on the City of Port St. Lucie's park system.

Fiscal Impact/Concurrency

Projections of fiscal impact are always difficult, however, Council has recently taken the approach of evaluating the net fiscal impact of a proposed project by analyzing it as if it were built today. In the case of LTC Ranch, it is not possible to do such an assessment since the uses cannot be predicted. Because a land use mix has not been determined for the project it is difficult to determine what public facilities and services will be needed, when they will be needed, and how much they will cost. The LTC Ranch proposal is too general for the County to do a reasonable level of capital improvement planning and concurrency management.

Approving a development of this magnitude should be done with a clear understanding of whether it will have a net positive or negative fiscal impact and whether or not local government can afford to provide anticipated services. The LTC Ranch proposal does not provide local government with this level of understanding.

The Elderly, Children and Families

Increasing the ability of the elderly and families to be independent and self-sufficient is a regional goal. Providing for community-based care for the elderly and children, providing employment opportunities close to affordable housing, and addressing special transportation needs of the elderly and children are recognized by RCPP policies as components of achieving these goals.

By not providing a master plan that: 1) establishes a fixed ratio of uses; 2) allows for an understanding of the relationship between uses; and 3) provides sufficient housing information, the LTC Ranch application does not describe how the development will address the special needs and problems of the elderly and families who may be living there.

Impacts on Adjacent Jurisdictions

LTC Ranch lies immediately adjacent to the corporate limits of the City of Port St. Lucie. There is no commitment to a master plan which is compatible with the City of Port St. Lucie's efforts to encourage infill and correct existing land use imbalances. Approval of LTC Ranch as currently proposed would go beyond fostering healthy competition to potentially producing serious financial consequences for City and County residents.

Negative impacts to the City stem from the proposed treatment of traffic produced by LTC Ranch (see TRANSPORTATION), and potential exacerbation of problems

associated with the single use nature of the City (see WATER and WASTEWATER).

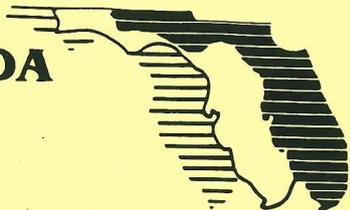
The issue of complementary development was of concern to Council when considering the St. Lucie West DRI, which is in the City of Port St. Lucie. There are over 80,000 platted lots in the City with roughly 52,000 of those lots undeveloped. St. Lucie West's approval was based on an evaluation which concluded that its development would complement rather than hinder the City in its efforts to address problems resulting from an existing land use imbalance. The approval of additional residential in LTC Ranch would exacerbate the single use character of the City (see IMPACTS ON ADJACENT JURISDICTIONS).

Conclusion

The DRI process is a comprehensive planning process intended to provide an opportunity to look beyond the gross land use designations found in local comprehensive plans. It is a process for planning an area of land in a manner that is respectful of resources and complementary to development patterns in adjacent jurisdictions. It is an opportunity to anticipate and plan for the long-term fiscal, environmental and social impacts that will come with construction of a specific plan of development. It is an opportunity for local government to decide whether approval of a specific plan of development is a good idea or a bad one for its citizens; whether the local government can afford to support the development through provision of services; whether the development is necessary; and whether it fits within the local government's image of what the area should look like and how it should function at buildout.

All of these considerations require a far more specific plan of development than has been provided. To approve the LTC Ranch proposal with as little information as has been provided in the ADA would subvert the intent of the DRI process and its value to local government as a comprehensive planning tool.

For all of the reasons summarized above, Council recommends **DENIAL** of the LTC Ranch ADA as a DRI.



TRANSPORTATION PLANNING OFFICE - DISTRICT 4

3400 West Commercial Blvd., 3rd Floor, Ft. Lauderdale, FL 33309-3421
Telephone: (305) 777-4601; Fax: (305) 777-4671

March 1, 1995

Ms. Sally Black
Review Coordinator
TREASURE COAST REGIONAL PLANNING COUNCIL
P.O. Box 1529
Palm City, FL 34990

Dear Ms. Black:

SUBJECT: LTC Ranch Development of Regional Impact (DRI)
St. Lucie County
Request for Final Comments

As requested in your memorandum of February 16, 1995, the Department has reviewed the draft Development Order (D.O.) sent by the Applicant. As outlined below, we have a number of concerns related to this project.

On page five of the draft D.O., there is a reference to a master plan, however, the master plan is not included in the draft D.O. and throughout our review of this DRI we have not been furnished with a master plan of the project. The Applicant's refusal to submit a master plan for the project has made it impossible for us to perform a thorough review of the potential traffic impacts of the project.

There is no phasing plan in the draft D.O. which corresponds to the material presented in the Application for Development Approval. The proposed buildout of the project is December 31, 2020, however there has been no traffic analysis provided which covers the complete buildout time frame. Based on previous understandings, we believed that the D.O. would contain conditions requiring a traffic study for the period after the year 2005, however, there is no mention of the need for a traffic analysis past the year 2005.

Transportation conditions 16.b., 16.f., 16.g., and 16.i., contain trip generation thresholds based on the original traffic analysis which we found insufficient, and have therefore not approved.

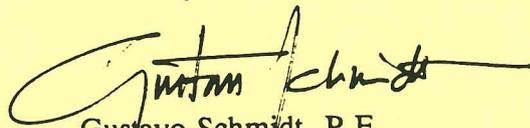
Table I contains a listing of roads and intersections that are to be monitored. In previous submissions of the proposed D.O., the applicant proposed to install a signal at the intersection of Glades Cut-Off Road and Midway Road, however, the need to monitor this intersection for signalization has not been included in this D.O.

Ms. Sally Black
March 1, 1995
Page Two

As stated in previous sufficiency reviews, we still find the Application insufficient, and therefore we recommend denial of the Development Order.

Please feel free to contact this office if you have any questions.

Sincerely,



Gustavo Schmidt, P.E.
District Planning Manager

GS:mww

cc: Maria Palombo
Bob Romig
Joe Yesbeck
Anita Vandervalk
John Anderson

INCONSISTENCY WITH THE STATE LAND DEVELOPMENT PLAN

The State Land Development Plan (SLDP) is a strategic, direction-setting document which is intended to provide a policy framework for State and regional agencies in conducting their planning programs. The plan provides land use and development guidelines intended to achieve a proper balance of economic prosperity with the protection and enhancement of Florida's natural resources.

The DCA prepared the SLDP, as mandated by the State and Regional Planning Act (Chapter 186, F.S.). Regional planning councils and local governments must consider whether, and to what extent, a Development of Regional Impact is consistent with SLDP.

Council has reviewed the Application for Development Approval (ADA) for LTC Ranch Development of Regional Impact for consistency with the SLDP. The development as described in the ADA, is inconsistent with the SLDP as follows:

Goal 5, Housing, Policy Cluster 19: Availability and Affordability of Housing

The LTC Ranch proposal does not assure that: 1) housing will be in close proximity to work places and other necessary public and private services; 2) a diversity of housing types and affordabilities will occur within the community; 3) there will not be homogeneous concentrations of low income residents isolated within the community; 4) a balance of low and moderate income housing opportunities will be available within the project consistent with employment opportunities potentially created on-site; and 5) housing opportunities for all ages and family situations will be available within the community.

Goal 7, Public Safety, Policy Cluster 35: Safe and Secure Citizenry

The LTC Ranch proposal does not: 1) address emergency sheltering needs for the community, 2) utilize mitigation techniques available at all levels of government to ensure adequate public shelter space; 3) encourage siting decisions of public buildings that could also be used as public shelters; and 4) provide a plan for development that encourages and supports post-disaster relief and recovery efforts.

Goal 8, Water Resources, Policy Cluster 37: Protection of Water Supply, and Policy Cluster 38: Protection of Water Resources

The LTC Ranch proposal does not: 1) ensure that the development is compatible with existing local and regional

water supplies; 2) promote water conservation; 3) protect aquifers from depletion; 4) protect surface and groundwater quality and quantity; 5) recognize limitations of the available groundwater supplies; 6) have a commitment that adequate water supplies will be concurrently available to serve the development without adversely affecting local and regional water sources and existing users; 7) address the prevention, abatement, and control of surface and groundwater pollution in its land use planning; and 8) ensure that stormwater runoff will not adversely impact the quality of ground and surface waters.

Goal 11, Air Quality, Policy Cluster 47: Improving Air Quality

The LTC Ranch proposal does not actively promote the use of alternatives to single passenger automobiles by providing a development plan for encouraging the use of other modes and forms of transportation.

Goal 12, Energy, Policy Cluster 49: Efficient Use of Energy

The LTC Ranch proposal does not: 1) encourage the reduction of per capita energy consumption; 2) improve the efficiency of traffic flow on existing roads; 3) provide a plan of development that encourages non-fossil fuel modes of transportation; 4) follow a development pattern which best promotes energy efficiency; and 5) consider in its planning the relationships between energy costs, land use patterns and densities, and transportation systems that would reduce total energy use.

Goal 16, Land Use, Policy Cluster 57: Balanced and Planned Development

The LTC Ranch proposal does not: 1) encourage the development of existing urban and platted lands; 2) promote development of redevelopment in downtown areas; 3) include a development plan that encourages mixed land uses, appropriately uses rural land, or ensures that necessary public facilities are equitably provided concurrent with development; 4) discourage development from areas where major new transportation facilities will be needed to accommodate new development; 5) encourage a balance and mix of land uses that would enhance the livability and character of urban areas; 6) encourage and assist local governments in evaluating the effects of significant developments in their jurisdictions; and 7) occur in an area of underutilized infrastructure and service capacity.

**Goal 17, Downtown Revitalization, Policy Cluster 76:
Promotion of Downtown Areas**

The LTC Ranch proposal does not: 1) provide incentives to encourage private sector investment in the preservation and enhancement of downtown areas; and 2) promote investment which encourage redevelopment of downtown areas.

Goal 18, Public Facilities, Policy Cluster 59: Maximizing the Use of Existing Public Facilities, and Policy Cluster 60: Planning for Public Facilities

The LTC Ranch proposal does not: 1) provide incentives for developing land in a way that maximizes the use of existing public facilities; 2) promote rehabilitation, and reuse of existing facilities, structures, and buildings as an alternative to new construction; 3) direct growth to currently serviced areas to protect the investment that already exists and to decrease the need for new facilities; 4) assist local government in identifying needed capital improvements and preparing five-year schedules for capital improvements; 5) promote development and redevelopment in currently urbanized and platted areas with services; 6) help to eliminate the need to finance expansion of facilities which are currently underutilized; and 7) ensure that all public services will be available concurrent with demand.

Goal 20, Transportation, Policy Cluster 63: Integrated Transportation Systems, and Policy Cluster 64: Transportation to Aid Growth Management

The LTC Ranch proposal does not: 1) integrate the adjacent FEC rail corridor into its plan of development for future use as a multi-modal system to carry people and goods to and from the community; 2) consider in its transportation planning the transportation needs of the elderly, very poor, and young; 3) assist local government in containing and limiting urban sprawl and creating opportunities for public transportation; 4) direct growth into patterns that will better support public transportation systems; 5) encourage development that contributes to reducing dependency on the automobile; 6) incorporate bicycle and pedestrian facilities into its planning; 7) ensure that growth impacts will occur concurrent with the availability of adequate transportation facilities; 8) ensure that adequate public right-of-way through the project will be available when needed; and 9) ensure that land use decisions and transportation improvements are integrated.

Goal 22, The Economy, Policy Cluster 67: Economic Stability

The LTC Ranch proposal does not: 1) encourage sound and proper land development and discourage sprawling inefficient suburban development which degrades Florida's quality of

life; and 2) does not promote local government's ability to determine the fiscal and economic impact the project will have on it and its taxpaying citizens.

The LTC Ranch DRI is inconsistent with the SLDP. This analysis of the proposed development project's consistency with the SLDP is required by Florida Statutes, Chapter 186 and Council's 1994-95 Contract with DCA. The determination of inconsistency is based on Council's interpretation of that plan. Any final determination of consistency or inconsistency shall be made by the State of Florida.

INCONSISTENCY WITH THE LOCAL COMPREHENSIVE PLAN ST. LUCIE COUNTY

St. Lucie County's Comprehensive Plan was adopted pursuant to the Local Government Comprehensive Planning and Land Development Regulation Act (Chapter 163, F.S.). The plan provides land use and development guidelines to help protect and improve the quality of life and natural resources in the County.

The Treasure Coast Regional Planning Council is required by the State to consider whether Developments of Regional Impact are consistent or inconsistent with the appropriate local government comprehensive plan. Council has reviewed the Application for Development Approval for LTC Ranch for consistency with St. Lucie County's Comprehensive Plan.

The development as proposed is **inconsistent** with the St. Lucie County Comprehensive Plan as follows:

Future Land Use Policies 1.1.2.1, 1.1.2.3, 1.1.2.5, 1.1.4.2, 1.1.5.2, 1.1.5.10, 1.1.8.1, 1.1.8.4, 1.1.12.2, and 1.1.12.3. These polices call for: 1) residential densities on portions of the site not to exceed one unit/2.5 acres; 2) orderly delivery of services concurrent with the impacts of development; 3) the provision of adequate setbacks and/or buffering from active agricultural operations; 4) new development to be designed and planned so as not to place an unanticipated economic burden on St. Lucie County services and facilities; 5) growth to occur in an efficient and rational manner and that priority in water and sewer service delivery be to existing development and redevelopment first; 6) assurance of appropriate infrastructure and services before the planned urban service area is extended; 7) central water and sewer service be available to serve new development greater than two units per acre before it is permitted; 8) development to be designed to include an efficient system of internal traffic circulation to prevent unnecessary trips on the major roadway network; 9) nonresidential uses to be compatible with residential uses; and 10) the timing and pace of development in the County such that all public services are available concurrent with new development, the efficiency of these services is maximized, and the cost to the public is minimized.

Traffic Circulation Policies 2.1.2.2, 2.1.2.4, 2.2.1.2, 2.3.1.1, 2.3.3.2; and Mass Transit Goal 3.1. These policies call for: 1) adequate circulation for pedestrians and motorized and nonmotorized vehicles to be provided; 2) developments to be designed to address the needs of bicyclists and pedestrians; 3) the mitigation of traffic impacts on the roadway system to maintain acceptable levels of service on that system; and 4) planning to promote the availability of transportation to transportation

disadvantaged population of the County in a safe and convenient manner.

Housing Goal 5.1 and Policies 5.1.2.5 and 5.1.2.7, which require: 1) an adequate mix of safe and sanitary housing to be provided which meets the needs of existing and future St. Lucie County residents; 2) all types of housing to be distributed throughout the County to provide a variety of neighborhood settings and to avoid undue concentrations in a single neighborhood; and 3) low and moderate income units to be located in proximity to shopping, employment, and transportation opportunities, and be served by central water and sewer.

Infrastructure Goals 6A.1 and 6D.1, Objective 6A.1.1 and 6D.1.1, and Policies 6A.1.1.1, 6A.1.2.7, 6A.1.3.2, 6A.1.4.3, 6D.1.1.1, 6D.1.2.2, 6D.1.2.7, 6D.1.3.3, 6D.1.5.1, and 6D.2.2.1, which require: 1) the County to provide central water and sewer service in a manner which provides the most efficient and economic public system and promotes orderly compact urban growth, not urban sprawl, leapfrog, or linear development; 2) central water and sewer service to be available concurrent with development and verification from the service provider; 3) priority be given to existing development approvals and redevelopment areas in the event of infrastructure and resource shortages; 4) central sewer service for developments with greater densities than two units per acre; 5) a variety of conservation techniques to be used in new development; and 6) DRIs to determine the available water resources beneath the development, determine the effect of withdrawal on the environment and existing and potential users, and make such information available to the County.

Recreation and Open Space Goal 9.1 and Policy 9.1.1.1 which require: 1) the provision of adequate recreation facilities and open space areas which offer a broad range of activities to all citizens of St. Lucie County, and 2) certain levels of service to be met for neighborhood, community, and regional parks.

Capital Improvements Goal 11.1.11 and Policies 11.1.1.11, 11.1.2.3, 11.1.3.8, 11.1.4.3 which require: 1) level of service standards be achieved and maintained concurrent with demand; 2) priority to be given to existing development approvals and redevelopment in the event of infrastructure and resource shortages; 3) that current residents do not subsidize an urban sprawl pattern of new development; and 4) that no development orders be issued unless levels of service for public facilities can be maintained.

The LTC Ranch DRI is inconsistent with St. Lucie County's Comprehensive Plan. This analysis of the proposed development project's consistency with the St. Lucie County

Comprehensive Plan is required by Florida Statutes, Chapter 186, and Council's 1994-95 Contract with DCA. The determination of inconsistency is based on Council's interpretation of that plan. Any final determination of consistency or inconsistency shall be made by St. Lucie County.

HOUSING

“In preparing its report and recommendations, the regional planning agency shall . . . consider whether, and the extent to which . . . the development will favorably or adversely affect the ability of people to find adequate housing reasonably accessible to their places of employment.”

Section 380.06, Florida Statutes

HOUSING

Issue

When adequate affordable housing does not occur in proximity to places of work, employees must budget a larger proportion of their incomes for transportation costs. This, in effect, can make housing less affordable. Providing housing in proximity to jobs and other needed services should also have a positive affect on the mobility of the elderly and children and assist in reducing energy consumption and improving air quality.

Policy

It is a regional goal to ensure that very low, low, and moderate income persons living within the Region have adequate and affordable housing (RCPP Goal 5.1.1). Council policy states that affordable housing shall be provided in proximity to employment opportunities (RCPP Policy 5.1.1.3).

Discussion

There is an abundance of undeveloped, platted lots within the City of Port St. Lucie which lies across Glades Cut-Off Road from the project. These lots are available in a variety of price ranges and either have or will have utility lines in place in two years. Therefore, opening up LTC Ranch for competing housing projects has potential negative impacts to the City of Port St. Lucie and to customers of the Port St. Lucie Utility Systems Department (see IMPACTS ON ADJACENT JURISDICTIONS).

The location, amount, type, timing of delivery, and affordability of housing to be provided by LTC Ranch cannot be predicted. This unpredictability is caused by the lack of a commitment to a master plan and the allowances for land use trade-offs as proposed in the ADA. The lack of commitment related to the plans for housing is a serious deficiency of the ADA. It prevents Council from determining consistency with the RCPP and State Plan on a variety of issues (see EDUCATION, DISASTER PREPAREDNESS AND RECOVERY, AIR QUALITY, ENERGY, AND ALTERNATE MODES OF TRANSPORTATION, PARKS AND RECREATION, THE ELDERLY, CHILDREN AND FAMILIES, and FISCAL IMPACT). It also prevents Council from carrying out the direct statutory charge of assessing the provision of adequate, affordable housing, close to places of employment and impacts on the adjacent jurisdiction of the City of Port St. Lucie.

The importance of addressing housing issues was recognized specifically in changes to the DRI Statute last year (Chapter 380.06 F.S.). The housing issue has become one of the three main issues specifically identified for regional

planning councils to focus on in their reviews of DRIs (see INTRODUCTION section).

A master plan of development is needed. At a minimum, the plan needs to provide information concerning the location of housing, its proximity to nonresidential uses, the amount of housing and housing types, when that housing is to be delivered in relationship to work place and shopping opportunities, and the range, price and location of affordable housing. Satisfactorily providing these elements in a plan for the property is necessary if Council is to determine consistency with the RCPP and State Plan.

Remedial Action

Based on a lack of a master plan which furthers Council's goals and policies on housing and housing-related issues, Council recommends **DENIAL** of LTC Ranch as proposed.

In order for the project to be reconsidered, the following remedial action should be undertaken:

1. Prepare and submit a master plan which provides the information requested and adequately addresses regional housing and housing-related issues discussed in the HOUSING and IMPACTS ON ADJACENT JURISDICTIONS sections of Council's Assessment Report for the LTC Ranch DRI.

REGIONAL AND STATE FACILITY IMPACTS

TRANSPORTATION

“In preparing its report and recommendations, the regional planning agency shall identify regional issues based upon . . . whether, and the extent to which: the development will have a favorable or unfavorable impact on state or regional . . . facilities . . .”

Section 380.06, Florida Statutes

TRANSPORTATION ANALYSIS OVERVIEW

The proposed LTC Ranch Development of Regional Impact (DRI) is a multi-phase development with expected completion in the year 2020. The project is located in the same general vicinity as two previously approved DRIs: The Reserve and St. Lucie West (see location maps in front of report).

The Application for Development Approval (ADA) provides a detailed traffic analysis for only the first two phases of development: years 1995-2000 and 2001-2005. The ADA suggests that the final phase of development should be subject to further DRI review as a substantial deviation.

The ADA indicated that an areawide buildout analysis (year 2020) was provided for information purposes only. This analysis would show the ultimate required roadway network given completion of Phase 1 and 2 of LTC Ranch, full buildout of The Reserve and St. Lucie West DRIs, and growth in other background traffic anticipated for the area. The analysis submitted was incomplete and did not address the full implications of approving such a large amount of new development so close to two other DRIs. This in part formed the basis for Florida Department of Transportation's (FDOT) recommendation of denial of LTC Ranch (see FDOT letter, Exhibit TR-1).

Instead of providing a master plan for the project, project trips have been allocated to three Traffic Analysis Zones (TAZs). The ADA indicates that land uses may be shifted across these TAZs in any arrangement and quantity as long as the number of external trips does not exceed the total number allowed for the phase (see Figure TR-1).



TRANSPORTATION PLANNING OFFICE - DISTRICT 4

3400 West Commercial Blvd., 3rd Floor, Ft. Lauderdale, FL 33309-3421
Telephone: (305) 777-4601; Fax: (305) 777-4671

March 1, 1995

Ms. Sally Black
Review Coordinator
TREASURE COAST REGIONAL PLANNING COUNCIL
P.O. Box 1529
Palm City, FL 34990

Dear Ms. Black:

**SUBJECT: LTC Ranch Development of Regional Impact (DRI)
St. Lucie County
Request for Final Comments**

As requested in your memorandum of February 16, 1995, the Department has reviewed the draft Development Order (D.O.) sent by the Applicant. As outlined below, we have a number of concerns related to this project.

On page five of the draft D.O., there is a reference to a master plan, however, the master plan is not included in the draft D.O. and throughout our review of this DRI we have not been furnished with a master plan of the project. The Applicant's refusal to submit a master plan for the project has made it impossible for us to perform a thorough review of the potential traffic impacts of the project.

There is no phasing plan in the draft D.O. which corresponds to the material presented in the Application for Development Approval. The proposed buildout of the project is December 31, 2020, however there has been no traffic analysis provided which covers the complete buildout time frame. Based on previous understandings, we believed that the D.O. would contain conditions requiring a traffic study for the period after the year 2005, however, there is no mention of the need for a traffic analysis past the year 2005.

Transportation conditions 16.b., 16.f., 16.g., and 16.i., contain trip generation thresholds based on the original traffic analysis which we found insufficient, and have therefore not approved.

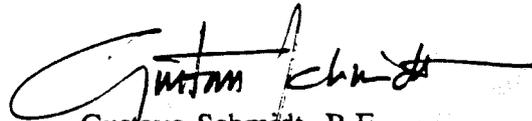
Table I contains a listing of roads and intersections that are to be monitored. In previous submissions of the proposed D.O., the applicant proposed to install a signal at the intersection of Glades Cut-Off Road and Midway Road, however, the need to monitor this intersection for signalization has not been included in this D.O.

Ms. Sally Black
March 1, 1995
Page Two

As stated in previous sufficiency reviews, we still find the Application insufficient, and therefore we recommend denial of the Development Order.

Please feel free to contact this office if you have any questions.

Sincerely,



Gustavo Schmidt, P.E.
District Planning Manager

GS:mww

cc: Maria Palombo
Bob Romig
Joe Yesbeck
Anita Vandervalk
John Anderson

TRAFFIC IMPACTS

Issue

Of special regional concern is that the LTC Ranch ADA is proposing to use roadway capacity which has already been accounted for in approved development in the area, particularly St. Lucie West and The Reserve DRIs. The traffic analysis which was presented by the applicant does not include the buildout traffic of these two projects. The applicant's analysis only includes about 80 percent of the total traffic which would be expected from these two projects if they build out to currently approved intensities. Analyzing LTC Ranch traffic impacts in this fashion is inappropriate. It does not allow for an adequate identification of roadway improvements needed to mitigate LTC Ranch traffic impacts.

Policy

Council Policy 19.2.1.8 addresses the methodology to be used when calculating background traffic volumes for impact analysis. The policy specifies four components of background traffic: 1) full buildout of approved developments within the project's area of influence; 2) full buildout potential of approved DRIs; 3) full buildout of approved developments within the project's area of influence that generate 500 or more daily trips; and 4) an annual growth factor.

Discussion

Council Policy 19.2.1.8 requires that the DRI traffic analysis assume all developments included as background traffic are fully built and occupied. This assumption is required so that roadway capacity which was assumed available for existing approved developments will not be double-counted as also available to other developments.

The LTC Ranch traffic analysis is **inconsistent** with Council Policy 19.2.1.8. This is of special concern because St. Lucie West and The Reserve DRIs have roadway impact areas which overlap the proposed LTC Ranch. St. Lucie West and The Reserve, by themselves, represent a major commitment of development rights in the area of 22,100 dwelling units, 2,050 hotel rooms, 5,781,760 square feet of industrial space, 3,047,160 square feet of retail space, and 1,885,960 square feet of office space. Council suggested a meeting among the three developers to find an equitable ("fair share") solution for expanding the roadway network to assure regional roads would operate at acceptable levels of service. It was the applicant's decision not to pursue this option.

The applicant is requesting that Council grant an exception to Policy 19.2.1.8. In deciding whether to grant a policy exception in this case, the following points need to be considered:

First, the LTC Ranch analysis assumes that St. Lucie West and The Reserve will not progress beyond year 2000 levels of development or about 80 percent of their respective approvals. This assumption discounts the traffic impact of these two projects by more than 20 percent or nearly 100,000 trips. That has the effect of "creating" a lot of capacity on the roadway network in the transportation model used by LTC Ranch to predict when roadway improvements would be needed. The end result is that the number of trips LTC Ranch can generate before the roads appear to fail (per Council, FDOT, and/or County standards) is much higher than the number of LTC Ranch trips the roads will actually be able to handle if the other projects develop as approved.

Second, St. Lucie West and The Reserve have to monitor trips on certain roadway links and expand the roadway network based on these counts, irrespective of what project generates the trips. Depending on the timing and pace of development of LTC Ranch, traffic from LTC Ranch could trigger improvements on the monitored links sooner than anticipated by St. Lucie West and The Reserve and stop development in these DRIs until they make required improvements. This has the affect of penalizing approved development in favor of new approvals.

Third, aside from any issue of fairness, this is of special importance to the Council with regard to St. Lucie West. Council supported opening more land for development in the Port St. Lucie area through approval of St. Lucie West in order to provide a place where elements which had been missing from Port St. Lucie could occur: a downtown, sites for workplace and shopping, and sites for recreational, education, and cultural activity.

Finally, if we included full build out of St. Lucie West and The Reserve along with Phase 1 and 2 of LTC Ranch, then it is anticipated that a significant amount of roadway improvements would be needed. This projection is based on the traffic analysis used for St. Lucie West and The Reserve. No such analysis was provided during review of LTC Ranch.

Granting an exception to Council Policy 19.2.1.8 is not advisable. An exception, in this case, could interfere with the ability of The Reserve, St. Lucie West, and other approved development in the area to build out. While St. Lucie West may decrease levels of development (they have initiated a Substantial Deviation review and indicated an

intent to do so) it would be inappropriate to speculate on what this decrease might be.

Conclusion

Approving the next significant increment of growth and development in this area will require a large expansion of the existing roadway network. Just the build out of already approved projects in the area will require, for example, development of new roadway corridors (i.e., West Virginia Drive and Torino Parkway) and new interchanges at Florida's Turnpike and I-95. To assure traffic impacts created by LTC Ranch will not use roadway capacity already committed to St. Lucie West and The Reserve, any further development approvals in the area should be tied to completion of a roadway network required for buildout of these DRIs and other vested approval.

Remedial Action

Based on the lack of and commitment to a master plan for development which would assure land uses that are compatible and complementary to the City of Port St. Lucie, and which do not adversely affect existing approved activities, Council recommends DENIAL of LTC Ranch as proposed.

In order for the project to be reconsidered, the following remedial actions should be taken:

1. Submit a traffic study performed according to Council Policy 19.2.1.8 and to the satisfaction of the Florida Department of Transportation.
2. Assure traffic impacts created by LTC Ranch will not use roadway capacity which has already been relied upon by St. Lucie West and The Reserve by assuring roadway expansion conditions included in the Development Orders for these two project are included in the Development Order for LTC Ranch DRI as well. This should be done by including the following condition:

No building permits shall be granted for the development of any parcel of land in the LTC Ranch until contracts have been let for the following roadway network expansions:

- a) Four-lane California Boulevard from West Virginia Drive to South Peacock Boulevard.
- b) Four-lane Torino Parkway from East Torino Parkway to Selvitz Road.
- c) Four-lane Cashmere Boulevard from West Virginia Drive to Prima Vista Boulevard.

- d) Four-lane East Torino Parkway from North Peacock Boulevard to Torino Parkway.
- e) Interchange at Torino Parkway and Florida's Turnpike.
- f) Two-lane West Virginia Corridor from Glades Cut-Off Road to Cashmere Boulevard.
- g) Interchange at West Virginia Drive and Interstate 95.
- h) Four-lane West Virginia Corridor from Cashmere Boulevard to Bayshore Boulevard.
- i) Four-lane West Virginia Corridor from Bayshore Boulevard to Airoso Boulevard.
- j) Four-lane West Virginia Corridor from Airoso Boulevard to Floresta Drive.
- k) Four-lane West Midway Road from Interstate 95 to St. James Drive.
- l) Four-lane Glades Cut-Off Road from Reserve Commerce Center (Go Team) entrance to West Midway Road.
- m) Six-lane St. Lucie West Boulevard from Interstate 95 to NW Peacock Boulevard.

No certificates of occupancy shall be issued until the roadway expansions listed under a) through m) have been completed.

All above configurations including intersections shall be permitted and constructed in accordance with City, County, and State criteria.

3. Develop a master plan which will provide local government a basis for deciding whether or not it makes sense to vest LTC Ranch to the remaining roadway capacity in the area.

PUBLIC RIGHTS OF WAY

Issue

The project could unnecessarily impede through traffic and the eventual development of adjacent lands unless adequate provisions are made for public roadways through the project. Failure to plan in advance for adequate right-of-way can prove costly.

Policy

Regional Goal 19.1.1 is to provide for the safe efficient movement of people and goods at a reasonable cost and at minimal detriment to the environment. Regional Policy 19.2.1.3 states that the regional roadway network shall be maintained at the standard of LOS C or better during average annual 24-hour conditions (LOS D during peak hour on links and intersections) and LOS D or better during peak season (peak hour and 24-hour) conditions. Council practice has been to utilize the roadway capacity volumes included in the Florida Department of Transportation tables to determine: 1) when a given roadway has reached a certain level of service; and 2) when project traffic is significant on a roadway. Council has also been utilizing the level of service standard adopted in the appropriate local government comprehensive plan in conducting DRI reviews. Council's use of the foregoing level of service standard is consistent with the requirements of Chapter 163.3180, F.S. and with the recently adopted Department of Community Affairs uniform standard rules for evaluating DRI traffic impacts. St. Lucie County has adopted the same level of service standard and also utilizes the FDOT capacity tables. Regional Goal 15.1.1 recognizes government's responsibility in its actions to protect the rights of all property owners.

Discussion

LTC Ranch lies in a triangle formed by two regional roads and a local road: West Midway to the north, Glades Cut-Off Road to the south, and McCarty Road to the west. I-95 parallels McCarty Road and bisects the eastern tip of the triangle. LTC Ranch is located in a rural area where north-south streets intersect main roads roughly every mile. On the other hand, east-west streets in this area are few. There are no existing public roads or streets running through the property that connect to the regional "ring roads" or serve as alternatives to these roadways.

A network of streets connecting main roads at one or two mile intervals is a typical condition for rural areas. Such a minimal grid serves rural areas very well. Traffic is light and having many alternative routes is unnecessary. As

rural areas become more densely developed the grid quickly becomes congested.

The grid of public through streets in developing areas should be spaced at least every one-half mile and perhaps every one-quarter mile, depending on the density anticipated. Providing a finer network of streets is a way to maintain an acceptable level of service on the original network without expanding lanes to a degree detrimental to older development along those roads. Providing several alternative routes for local and through traffic is also a good emergency management strategy since it decreases the likelihood that the flow of traffic will be stopped due to accident or other incident along one main route. The LTC Ranch proposal falls short of this standard.

The portion of LTC Ranch lying west of I-95 encompasses roughly 2,,065 acres and represents a potential 1.5-mile road block to expanding the network in a north-south direction and a 2.5 mile one for expansion in an east-west direction. Currently, only one public thoroughway corridor is planned north-south and one in the east-west direction. At a minimum, two north-south public through way opportunities and five east-west options would be needed to provide a one-half mile interval network of roads.

Planning for the western part of the property should also encompass at least two public access points where the property bounds the Harris Corporation parcel on the west and south. This will allow future access to a potential employer without having to travel on West Midway Road.

The parcel to the east of I-95, encompasses roughly 390 acres. The addition of one north-south and one east-west public through way, perhaps intersecting near the southern portion of this parcel is needed to provide the minimum recommended network. While expansion of the east-west grid across the property may be challenging, the option to do so should not be foreclosed by approval of a project.

Waiting for an area to develop before securing the rights of way to expand the grid creates problems, including increasing the cost of resolving congestion problems and causing distress for residents. It could also unnecessarily limit development potential in the area. A master plan needs to be developed which will incorporate and reserve necessary rights of way so various options for expanding the grid of public through streets in the area will be available when needed.

Remedial Action

Based on the lack of public rights-of-way for through streets and the lack of a master plan which adequately

addresses this issue, Council recommends DENIAL of LTC Ranch as proposed.

In order for the project to be reconsidered, the following remedial action should be undertaken:

1. Prepare and submit a master plan which adequately addresses the issues discussed in the PUBLIC RIGHTS-OF-WAY section of the Council's Assessment Report for the LTC Ranch DRI.

REGIONAL AND STATE RESOURCE IMPACTS

“In preparing its report and recommendations, the regional planning agency shall identify regional issues based upon . . . whether, and the extent to which the development will have a favorable or unfavorable impact on state or regional resources . . .”

Section 380.06, Florida Statutes

AIR QUALITY, ENERGY, AND ALTERNATIVE MODES OF TRANSPORTATION

Issues

Increased carbon monoxide (CO) emissions from traffic may cause or contribute to a violation of State and federal ambient air quality standards and other negative atmospheric effects. The project will increase the Region's dependence on imported energy sources and interferes with the ability to achieve Regional and State Goals regarding alternative modes of transportation.

Policy

Regional Goal 11.1.1 requires the maintenance of acceptable air quality levels throughout the Treasure Coast Region. Regional Goal 12.1.2.1 is to decrease the Region's dependency on imported energy sources. Regional Goal 19.1.1 is to provide for the safe and efficient movement of people and goods at a reasonable cost and at a minimal detriment to the environment.

The RCPP provides direction that encourages the Region to use energy more efficiently and to diversify energy sources to decrease the Region's vulnerability to fuel price increases and supply interruptions. Regional Policy 11.1.1.2 states that transportation plan development and project reviews shall consider provisions for bicycle lanes, sidewalks, car pooling, mass transit, and other transportation methods which reduce polluting emissions. The RCPP encourages reductions in the per capita use of private automobiles through a combination of the following provisions: 1) public transportation alternatives; 2) housing opportunities in proximity to employment opportunities; 3) concentration of essential services in proximity to demand; 4) reduced parking requirements in high density business/residential districts; 5) incentives for use of high occupancy vehicles and alternative modes of transportation; 6) transit ridership amenities (shelters, route information, and schedules); and 7) bicycle and pedestrian paths which provide interconnecting routes between residences, employment, retail centers, recreation facilities and other public facilities (RCPP Policies 19.1.1.1, 19.1.1.5, 19.1.1.6, 19.1.1.7, and 19.1.1.9).

Discussion

Because no master plan has been provided for LTC Ranch, it is impossible to determine to what extent the project will accommodate and encourage alternative modes of transportation and further the other goals and policies listed above.

Air quality is an important factor contributing to quality of life. Energy consumption is a regional concern both as it relates to electrical generation and to vehicle operation for transportation. The principle threat to air quality within the Treasure Coast Region is vehicle emissions and the primary consumption of foreign energy sources comes from vehicle use. Thus, the goals of protecting air quality and reducing levels of dependence on foreign energy sources are inextricably entwined with the goal of providing efficient means of transportation.

As levels of service decrease, vehicle combustion efficiency decreases and vehicular operating rates increase. This problem is controlled by requiring maintenance of levels of service standards on road systems, especially on major thoroughfares and expressways which are designed to efficiently carry large volumes of greater than local traffic. Recommendations for addressing project impacts related to roadway level of service standards are typically tied to requiring construction of additional roadway capacity. Such recommendations are included under the TRAFFIC IMPACTS section of this report. These recommended improvements cannot be relied upon as a solution beyond Phase II of the proposed LTC Ranch.

Council policy recognizes that reducing the number of vehicles using the road system is a better way to assist in mitigating level of service impacts. Land use planning and project design directed at reducing trip length or encouraging alternative modes of transportation can reduce the amount of vehicle use. Reductions accomplished through careful planning and design have added benefits in furthering several goals and policies found in the State and Regional Plan including those health and economic-oriented goals enumerated above as well as addressing the special needs of the elderly and children (see THE ELDERLY, CHILDREN and FAMILIES). The location of LTC Ranch adjacent to a FEC rail corridor offers an opportunity to plan the project in a way which will not foreclose the opportunity to take advantage of this location in the future. The lack of planning in the LTC Ranch proposal makes it difficult to determine whether the proposal will actually further State and regional goals and policies in these issue areas.

DRI master planning is the appropriate time to address issues of other modes of transportation. It is relatively easy to provide recreational bike paths and sidewalks on a parcel by parcel basis at the time of individual site plan review. Actually effecting the use of alternative modes of transportation, however, requires more comprehensive planning. The master plan and details of how development is executed affect: 1) how well the project will be served by public transit; and 2) whether it will have a positive

influence when it comes to encouraging residents to walk or bicycle.

In general, designing for transit service means planning for public transportation as an asset to the development. Such planning considerations include: 1) providing comfortable transit stops; 2) avoiding barriers to efficient circulation of busses; 3) planning for pedestrian activity; 4) designing streets for both the pedestrian and car; and 5) taking into account the demands of the South Florida climate. LTC Ranch has not considered these factors in its planning for the property and, therefore, has not addressed several regional issues consistent with the RCPP and State plan.

Specifically, the internal street network is undefined. The mix, location, density, and orientation of land uses to one another is unknown. A system of pedestrian and bicycle connections between uses has not been proposed. No proposals have been provided for site design to take advantage of the FEC railway corridor which runs by the property. Providing the level of community planning necessary to accommodate alternative modes of transportation is especially important in this case given roadway capacity constraints in the area, the potential for air quality violation, and the project's location adjacent to the FEC railway corridor. The lack of a master plan raises several areas of inconsistencies with the State and Regional Plan.

Indirect energy costs are associated with the use of irrigation, fertilizers, and pesticides needed to maintain landscaped areas. By landscaping with native plant species that are appropriate for site conditions and which are resistant to drought and disease, indirect energy use can be reduced. Energy costs can also be reduced by using vegetation to shade parking lots and buildings. There are no commitments in the ADA which address these issues.

Remedial Action

Based on the lack of a master plan demonstrating the ability of the project to accommodate alternate transportation modes or reduce dependency on foreign energy sources, Council recommends DENIAL of LTC Ranch as proposed. Energy consumption continues to increase in the Region. Before approving LTC Ranch, more consideration through master planning needs to be given to site design and incorporating other energy saving features that will reduce the project's energy consumption and allow for a determination of consistency with the RCPP.

In order for the project to be reconsidered, the following remedial actions should be undertaken:

1. Prepare and submit a master plan which adequately addresses the regional issues discussed in the AIR QUALITY, ENERGY, AND ALTERNATIVE MODES OF TRANSPORTATION section of Council's Assessment Report for the LTC Ranch DRI.

2. Provide mitigation measures for incorporation into the ADA which adequately addresses the potential for air quality violations related to the project.

DRAINAGE

Issue

Stormwater runoff from this project may have an adverse impact on the water quality of receiving water bodies unless adequate treatment of the runoff is provided. Long term storage may decrease unless the surface water management system is designed to retain enough stormwater to maintain the current water table.

Policy

Council policy addresses the quality of waters both within the site and leaving the site. Council Policy 8.2.1.1 requires a surface water management system that provides a level of treatment at least equivalent to that provided by retention or detention with filtration of the runoff from the three-year, one-hour storm event or of the first inch of runoff, whichever is greater. This requirement can be waived if one-half inch of runoff is retained prior to discharge to the lake detention system. Council policies 8.2.1.2 and 8.3.1.3 require that vegetated and functional littoral zones and native upland buffers be included as part of any new surface water management system of lakes equal to or greater than half an acre.

Council Policy 8.1.1.8 also prohibits activities which would adversely affect the quantity of water entering the Region's aquifers and calls for maintenance or enhancement of storage and recharge potential of properties undergoing development.

Discussion

The Revised Impact Assessment Report prepared by the South Florida Water Management District (SFWMD) indicates that there is a significant potential for adverse regional impacts (see Appendix A). District staff cannot confirm that the proposed project can be developed in a manner that does not have adverse regional water resource-related impacts (see WATER SUPPLY). This conclusion is based on the preliminary nature of the project design, the size and scope of the proposed project, the extended buildout period, and the applicant's desire to submit detailed development plans at a later date.

The proposed drainage system is very conceptual since the applicant has not committed to a specific master plan. The surface water management system is to consist of a network of lakes and wetlands which will overflow when levels reach the 25 year/three-day flood elevation. The required level of dry pretreatment is to be provided where developed areas discharge into the lakes or wetlands. A master positive drainage system which is to be located adjacent to the

roadways will be interconnected with the lakes and wetlands. The final lake locations are not being proposed at this time. The master drainage system is to be designed to allow it to backflow, after pretreatment, into the wetlands. This will allow for equalization of lake and wetland water levels. The wetland water elevations are to be determined by the control elevation set for each of seven drainage basins planned for the project. The control elevations are to simulate existing hydrologic conditions and maintain normal wetland hydroperiods. Discharge from the site is to occur through a network of swales or culverts to the ditches along Glades Cut-Off Road. Water then flows under Glades Cut-Off Road through metal pipes and eventually enters Ten Mile Creek and the North Fork of the St. Lucie River.

The control elevations to be established for the surface water management systems are of special concern. The level at which these elevations are set can have a tremendous effect on the ability to maintain normal hydroperiods in the wetlands preserved on-site. The control elevations are to be set one foot below existing ground for each basin. This is consistent with the findings of the St. Lucie County Soil Survey. The application states that the applicant believes the water tables are lower than the criteria stated above, and control elevations may be lowered if monitoring results for one year support the lower levels. Monitoring the water levels for one year may not be adequate to determine the proper control elevation.

Another concern is the applicant's proposal to design the drainage system so the water can back flow into the wetlands from the lake system. This design raises concerns about the quality of water entering the wetlands as well as the need for such a design. If the lakes are full enough to backflow into the wetlands, it seems likely that the wetlands would already be full. Such a design may do more harm than good by altering the normal hydroperiod of the wetlands, and, possibly make it easier for contaminants such as fertilizers to enter the preserved wetland systems.

The Florida Department of Environmental Protection (DEP) expressed concerns regarding wetlands. DEP has indicated that the applicant needs to obtain a wetland jurisdictional determination from the Department to determine the proper pathway for the planning and processing of the stormwater management application. DEP has also indicated that the applicant has not provided adequate data to evaluate the quality of surface water, groundwater, and sediment conditions (see Exhibit DR-1).

The lack of specific information makes it impossible to evaluate the proposed drainage system to determine if it is consistent with the RCPP and State Plan. Any approval of the project should be tied to the preparation and submittal

of a master plan that delineates land uses and shows specific locations of lakes and other features necessary to evaluate the water management systems. Issues related to water quantity and quality should be resolved with DEP and SFWMD prior to DRI approval.

Remedial Action

Based on the potential for adverse regional impacts to surface water quantity and quality, and the lack of specific details related to a master plan and proposed drainage plan, Council recommends DENIAL of LTC Ranch as proposed.

In order for the project to be reconsidered, the following remedial action shall be undertaken:

1. Prepare and submit a master site plan and a proposed drainage plan in sufficient detail to adequately address regional issues discussed in the DRAINAGE section of Council's Assessment Report for the LTC Ranch DRI.



Department of Environmental Protection

Lawton Chiles
Governor

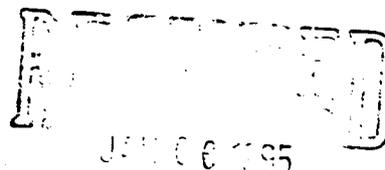
Port St. Lucie Branch Office
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Port St. Lucie, FL 34952

Virginia B. Wetherell
Secretary

(407)871-7662 or (407)335-4310

January 4, 1995

Mr. Michael Busha
Director
Treasure Coast Regional Planning Council
3228 S.W. Martin Downs Blvd.
P.O. Box 1529
Palm City, FL 33490



TREASURE COAST REGIONAL
PLANNING COUNCIL

RE: LTC Ranch DRI

Dear Mr. Busha:

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LTC Ranch DRI

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Detection limits at or below the MCL must be used for those parameters.

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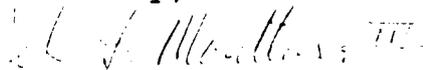
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Question 18 - Wastewater Management - The comments presented in the Council's September 10, 1993 Determination of Informational Sufficiency for Question 18 are still correct. Projected excess capacity for each phase is not identified, other commitments for that capacity, and required capital improvements, and timing of delivery of services are not identified. That information must be provided.

Thank you for the opportunity to summarize our comments and identify the information we need to properly evaluate this Development of Regional Impact. Please call me at (407) 871-7662 with any questions.

Sincerely,



John F. Moulton, III
Environmental Administrator

cc: John Outland
Vik Kamath
Marion Hedgepeth
Al Mueller

enclosures (2)

IMPACTS ON ADJACENT JURISDICTIONS

“In preparing its report and recommendations, the regional planning agency shall identify regional issues based upon . . . whether the development will significantly impact adjacent jurisdictions.”

Section 380.06, Florida Statutes

COMPATIBILITY WITH ADJACENT JURISDICTIONS

Issue

New development should be compatible and complementary to surrounding land uses and should not negatively affect existing approved activities.

Policy

It is a Regional goal to provide for a balanced, well planned compatible mix of land uses which are appropriately located (RCPP Goal 16.1.2).

Discussion

LTC Ranch is located immediately to the west of the City of Port St. Lucie. The LTC Ranch proposal, especially without the guide of a master plan, may exacerbate the single-use character of the City of Port St. Lucie. The LTC Ranch proposal does not support or encourage infill of existing urban areas in the County, especially in the City of Port St. Lucie.

Port St. Lucie is 80 square miles with over 80,000 platted lots. Approximately 35% (28,000) of the lots are developed. The addition of 2500 dwelling units (Phases 1 and 2) or 6500 dwelling units (buildout) is not desirable or supportive of infilling existing urban areas given the balance of undeveloped residential properties in the Port St. Lucie area. It is estimated that the permitted and vested residential properties in the City of Port St. Lucie will provide housing opportunities beyond the year 2035. Not only are there over 50,000 lots undeveloped in the older parts of Port St. Lucie, St. Lucie West DRI permits up to 18,000 dwelling units and The Reserve DRI allows an additional 2690 units. These numbers are not included in the 80,000 platted lots cited above.

The LTC Ranch proposal includes large allocations of non-residential uses (office, commercial and industrial/4,193,700 sq. ft.). When combined just with the square footage allowed in The Reserve and St. Lucie West, these three projects could potentially provide over 16 million square feet of non-residential uses. This number of 16 million is comparable to approximately 12 regional malls the size of The Gardens Mall or about 20 industrial parks the size of the Crossroads (800,000+ square feet) located in St. Lucie County.

The market study provided with the ADA (dated January 1992) makes a fundamental assumption about LTC Ranch's potential market share and the growth patterns of St. Lucie County. The market study includes comparisons of the effect of I-95 on office development in Palm Beach County and how this would be duplicated in St. Lucie County. To make such a statement

ignores the location of I-95 in St. Lucie County versus its location in Palm Beach County. I-95 in Palm Beach County is located 2-5 miles from the Intracoastal with well over half of the development in the County lying west of I-95. At the Indiantown interchange that distance is closer to 7-8 miles. This holds true in St. Lucie County as well. The study further states that "the majority, if not all growth during the buildout time frame of LTC...will occur in the western part of St. Lucie County". Given that I-95 is, generally speaking, the western limit of urban development and much remains to be infilled, such intense development west of I-95 is not only unlikely, but undesirable in that it would not support or encourage infill.

The conclusion that LTC Ranch poses unacceptable adverse impacts on an adjacent jurisdiction is related to the failure to commit to a master plan compatible with and supportive of the City of Port St. Lucie's efforts to fill up and build out. This issue was of concern to Council at the time the St. Lucie West DRI was reviewed.

St. Lucie West was supported by Council largely because it had the potential to complement the City's land use mix which is skewed heavily on the residential side. St. Lucie West offered an opportunity to provide the City with needed nonresidential uses and a City-center or downtown that was sorely missing from the City's mix. Approval of additional development of the magnitude proposed by LTC Ranch goes beyond fostering health competition. It has the potential to interfere with the infill and development of Port St. Lucie and to produce serious financial consequences for the City and existing County residents (see TRANSPORTATION, WATER SUPPLY, WASTEWATER, and PARKS AND RECREATION).

Remedial Action

The void created by the missing master plan, combined with the concept of land use trade-offs related to trip generation, provides little guidance as to the ultimate mix of land uses and therefore, LTC Ranch's impact. Based on the lack of and commitment to a master plan which would address land uses that are compatible and complementary, and do not adversely affect existing approved activities, Council recommends DENIAL of LTC Ranch as proposed.

In order for the project to be reconsidered, the following remedial actions should be taken:

1. Develop a master plan which would address the issues raised in the IMPACTS ON ADJACENT JURISDICTIONS section of Council's Assessment Report for the LTC Ranch DRI. At this time, such a master plan should focus on the triangle of land located east of I-95. Depending upon the organization, type and quantity of development proposed, it may be possible to

address the regional issues of 1) timing and pace of development; 2) efficiency in delivery of public services; and 3) complementing and supporting infill of Port St. Lucie. Given the highly speculative nature of LTC Ranch, this limited approach may also allow a necessary commitment to planning that provides local government the ability to reasonably assess impacts and decide whether or not approving additional development in the area at this time makes sense. Such a development proposal may or may not exceed development thresholds requiring DRI review.

Issue

When the use of existing public facilities is not optimized, the full benefit of the substantial public investment which made those facilities possible is not realized and may actually create a financial burden for existing residents.

Policy

It is Regional goal to maximize and optimize the use of existing public facilities (RCPP Goal 17.1.1) and efficiently provide public services concurrent with demand (RCPP Goal 17.2.1). It is Council policy that development should not be approved which would allow individual parcel development to occur in a manner which would preclude efficient delivery of necessary services at a reasonable cost (RCPP Policy 16.1.1.4).

Discussion

The City of Port St. Lucie recently approved a \$14.7 million water and wastewater special assessment district for the area immediately east of LTC Ranch. This will open up an area of 6000 single family lots as well as nonresidential development, which has previously been off limits since it lacked the water and sewer infrastructure necessary to permit development.

While extension of service lines is an expense which can be charged to the area requesting service, it is not the only consideration in cost-effective provision of service. In the past, Port St. Lucie has had to flush stagnant water from lines in areas where too few homes were connected to generate adequate flow. This inefficiency makes the system expensive to operate and maintain. To the extent that opening residential lands within LTC Ranch slows infill of existing lots, it will exacerbate existing system inefficiencies and costs to existing customers.

While the LTC Ranch property is bisected by the County's Urban Service Area boundary, the LTC Ranch proposal does not provide enough information to reasonably estimate whether the development of this area will place a disproportionate financial burden on the existing County and City residents including the existing customers of the Port St. Lucie Utility Systems Department (see WATER SUPPLY, WASTEWATER, and FISCAL IMPACT AND CONCURRENCY sections).

Remedial Action

Based on the lack of and commitment to a master plan which would address the efficient delivery of public services, Council recommends DENIAL of LTC Ranch as proposed.

In order for the project to be reconsidered, the following remedial actions should be undertaken:

1. Prepare and submit a master plan which adequately addresses the regional issues discussed in the IMPACTS ON ADJACENT JURISDICTIONS, WATER SUPPLY, WASTEWATER, and FISCAL IMPACT AND CONCURRENCY sections of Council's Assessment Report for the LTC Ranch DRI.

WATER SUPPLY

Issue

It is uncertain whether or not the Port St. Lucie Utility Systems Department will be able to provide enough water to meet the needs of the entire service area plus the needs of LTC Ranch without developing a new source of raw water. Expansion of the service area raises questions regarding consistency with the Regional goal regarding cost efficient provision of services. It is also uncertain if LTC Ranch will be able to draw enough water from the surficial aquifer and the on site lakes to meet its irrigation demand without adversely impacting the wetland preserve areas and other existing users.

Policy

It is a goal of Council to assure that the Region's water supply is managed to provide for: 1) protection of fish and wildlife values; 2) protection of natural systems and their functions and values; 3) agriculture; 4) power generation; and 5) domestic, municipal, and industrial needs on a sustainable basis (RCPG Goal 8.1.1).

The following Council policies address the above issue and are relevant to this project:

1. No activity shall be permitted that would result in the degradation or over utilization of potable water resources (RCPG Policy 8.1.1.9);
2. Where an insufficient supply of water is available to meet the needs of the natural systems, fish and wildlife, existing agriculture, and a growing human population, potable water demands of the latter sector should be met by reverse osmosis or other technology (RCPG Policy 8.1.1.2);
3. The lowest acceptable quality water shall be used to meet nonpotable water demands and that wastewater reuse shall be required, where appropriate. This policy also encourages the use of native and drought tolerant vegetation in landscaping to reduce the demand for irrigation water and also encourages the use of water-saving devices to the maximum extent feasible (RCPG Policy 8.1.1.6); and
4. New urban development, including residential development at densities of two units per acre or greater, shall only occur within areas where necessary urban services and facilities exist or will exist concurrent with development (i.e., within the Urban Service Area). This policy is intended to encourage

urban infill and maximize use of existing urban facilities and infrastructure (RCPD Policy 16.1.1.1). It is noted that due to environmental constraints, ability to provide adequate levels of service, and potential for incompatibility with existing adjacent land uses, not all areas within the Urban Service Area will have equal development potential (RCPD Policy 16.1.2.2).

Discussion

The estimated water demand at buildout of Phase 2 (2005) is 0.981 million gallons per day (MGD) for potable water and 0.604 MGD for non-potable water. Ultimate buildout of the project (2020) will require approximately 2.642 MGD for potable water and 1.568 MGD for non-potable water resulting in a total water supply of 4.21 MGD.

LTC Ranch is not currently in any utility service area. The ADA indicated that potable water would be provided by St. Lucie County. Responsibility for the utility was acquired by the City of Port St Lucie in October 1994 and the Port St. Lucie Utilities Services Department (PSLUSD) will now be the supplier. Either a modification of PSLUSD's South Florida Water Management District (SFWMD) public water supply water use permit will be required or a user's agreement will need to be executed before service can be provided.

Current PSLUSD withdrawals are at approximately 60 percent of their allocation. An increase in allocation is not needed until withdrawals are at 100 percent, however, it is usual for the request for an increase to be initiated before then to allow time to resolve permitting issues. Issues that must be resolved prior to approving any increase in withdrawals from the surficial aquifer include environmental impacts, proximity to pollution sources, saline water intrusion, and competition with other existing users for the available resource.

The SFWMD and the Florida Department of Environmental Protection (DEP) both expressed concerns regarding the ability of the surficial aquifer to provide additional water in this area (see Appendix A and Exhibit WS-1). DEP has stated that past shortages during peak season indicate that wellfield capacity in this area may be a serious concern. SFWMD recommends that the applicant and the utility pursue other alternatives, such as increased conservation measures and development of the Floridan Aquifer, to meet the demands of this project.

Development of the Floridan as a source will require the use of reverse osmosis treatment in order to meet state drinking water standards. These systems can be expensive to

construct, and brine disposal may become an additional problem. Regardless of whether development takes place on existing lots or in LTC Ranch, the allocation will eventually have to be increased, however, the more water efficient the project, the more time the utility has before resorting to a new source of water.

Expansion of the service area raises questions of consistency with the regional goal regarding cost efficient provision of services. While extension of service lines is an expense which can be charged to the area requesting service, it is not the only consideration in cost effective provision of service. In the past, Port St. Lucie has had to flush stagnant water from lines in areas where too few homes were connected to generate adequate flow. This makes the system expensive to operate and maintain. To the extent that opening new residential lands within LTC Ranch slows infill of existing lots, it will exacerbate the existing system inefficiencies and cost to existing customers.

It would be prudent on the part of the City and St. Lucie County to evaluate water supply issues more thoroughly before new land in the area is opened up and approved for development. At a minimum, any public water supply plan established for the area should document the following: 1) the sources of a sustainable water supply to support existing and future needs of the City of Port St. Lucie, 2) whether these sources are capable of providing a sustainable supply to new and expanded service areas, and 3) the fiscal impact on existing and future customers in the service area related to future service area expansions.

The non-potable water demand for landscape irrigation is to be met by withdrawals from surficial aquifer wells and the project's on-site lakes. The applicant indicates that reclaimed water will be utilized in the future if and when it is made available by the PSLCUSD. The ADA does not show locations of the proposed wells which is necessary for the SFWMD to perform an evaluation of the potential for adverse impacts to the wetlands and other existing legal users.

The SFWMD is concerned about the capability of the surficial aquifer and the on-site lakes to meet the project's long-term demands. As proposed, the potential exists for adverse impacts to the wetlands and the amount of water available for other users in the vicinity of the project. SFWMD staff recommend that the applicant reduce dependence on limited ground and surface water supplies by pursuing other alternatives, such as reclaimed water and water conservation measures, to the greatest extent possible.

Remedial Action

Based on the potential for adverse impacts to the regional water supply, the lack of a guaranteed potable water supply source, and the lack of specific details related to a master plan and proposed source of non-potable water, Council should recommend DENIAL of LTC Ranch as proposed.

In order for the project to be reconsidered, the following remedial actions should be undertaken:

1. Develop a long-term water resource plan which guarantees a future supply of potable water.
2. Provide a plan of development which: 1) complements existing residential development within the City of Port St. Lucie in terms of cost-efficient service delivery; 2) encourages the City to build out; and 3) provides for an orderly progression of development on the site.
3. Prepare and submit a master site plan and show the location of all wells and points of withdrawal of non-potable water. The plan should be of sufficient detail to allow the South Florida Water Management District to evaluate the impacts and provide assurance that any impacts to nearby wetland systems are minor and resolvable, and that other existing users will not be adversely affected. Assurance from the South Florida Water Management District, Florida Department of Environmental Protection, and Port St. Lucie Utility Systems Department that a plan is in place that will guarantee a future supply of potable water for the project and the entire service area.



Department of Environmental Protection

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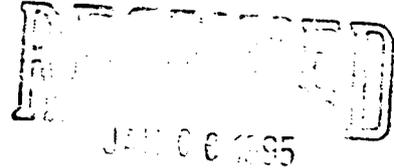
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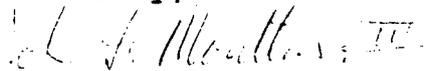
I understand that the applicant has not provided the Council copies of the October 11 letter or the report, "Results of Requested Monitoring Program LTC Ranch, St. Lucie County, Florida." I have enclosed copies for your information.

Question 17 - Water Supply - The comments presented in the Council's September 10, 1993 Determination of Informational Sufficiency for Question 17 are still correct. Projected excess treatment capacities and permitted allocation of the off-site potable water supply for each phase of the project have not been submitted. Other commitments made by the City of Port St. Lucie utility have not been identified. This Department's evaluation of current conditions of the City of Port St. Lucie utility system indicates that excess potable water capacity is not currently available without the City beginning expansion of their facility. The City's expansion of the water system capability is required by the Memorandum of Understanding between the City and this Department. The water supply information must be provided.

Question 18 - Wastewater Management - The comments presented in the Council's September 10, 1993 Determination of Informational Sufficiency for Question 18 are still correct. Projected excess capacity for each phase is not identified, other commitments for that capacity, and required capital improvements, and timing of delivery of services are not identified. That information must be provided.

Thank you for the opportunity to summarize our comments and identify the information we need to properly evaluate this Development of Regional Impact. Please call me at (407) 871-7662 with any questions.

Sincerely,



John F. Moulton, III
Environmental Administrator

cc: John Outland
Vik Kamath
Marion Hedgepeth
Al Mueller

enclosures (2)

WASTEWATER

Issue

It is uncertain whether or not there will be enough wastewater treatment plant capacity to meet the future needs of the existing service area plus the needs of LTC Ranch without expanding plant capacity. Expansion of the service area raises questions regarding consistency with the Regional goal regarding cost-efficient provision of services.

Policy

Council Goal 16.1.1 is to provide the levels of service necessary to achieve a high quality of life, cost-effectively. Council Policy 16.1.1.2 calls for all development to take place concurrent with, or after the provision of, necessary infrastructure and services, including centralized wastewater treatment and disposal services. New urban development, including residential development at densities of two units per acre or greater, shall only occur within areas where necessary urban services and facilities exist or will exist concurrent with development (i.e., within the Urban Service Area). This policy is intended to encourage urban infill and maximize use of existing urban facilities and infrastructure (RCPP Policy 16.1.1.1). It is noted that due to environmental constraints, ability to provide adequate levels of service, and potential for incompatibility with existing adjacent land uses, not all areas within the Urban Service Area will have equal development potential (RCPP Policy 16.1.2.1).

Discussion

Wastewater treatment presents three areas of regional concern: 1) uncertainty of adequate public wastewater disposal capacity concurrent with need; 2) economic impacts associated with providing treatment; and 3) cost and efficiency issues associated with extending utility service when there are so many vacant lots already within the utility service area. These concerns are discussed in this section. Cost and efficiency issues are treated in more depth in the section on COMPATIBILITY WITH ADJACENT JURISDICTIONS.

The amount of wastewater generation for LTC Ranch is estimated to be 0.369 million gallons per day (MGD) for Phase 1 (1995-2000), 0.612 MGD for Phase 2 (2001-2005), and an additional 1.661 MGD for Phase 3 (2006-2020). This yields a total wastewater generation of 2.642 MGD at buildout of the project. The applicant proposed to obtain wastewater treatment service from the St. Lucie County. Responsibility for the utility was acquired by the City of

Port St. Lucie in October 1994. The new utility entity is called the Port St. Lucie Utility Systems Department (PSLUSD).

The PSLUSD North Port Wastewater Treatment Plant is located about 5 miles east of the project site. The permitted capacity at this facility is 1.0 MGD; current flow is roughly 0.7 MGD, and the reserved capacity is approximately 0.2 MGD. This leaves approximately 0.1 MGD of capacity available for all new developments that may be proposed in the service area.

DEP has expressed concerns regarding PSLUSD's ability to provide wastewater effluent disposal for the proposed development (see Exhibit WS-1). Preferred disposal methods such as deep wells or reuse systems can be very expensive. The applicant has not indicated financial support for these capital improvements. Assurances have not been provided that adequate plant capacity will exist to serve the entire service area concurrent with development (see Exhibit WW-1).

The City has adopted a uniform extension policy to set forth the service and financial relationship between the utility and prospective consumers. The developer will be required to provide the utility timeframes for water or sewer needs and enter into a written agreement with the City of Port St. Lucie that sets forth in detail the terms and conditions for service to the property. While a mechanism for extension exists, it is more efficient to hook-up new houses on existing platted lots in the City where the trunk lines are in place and a two-year program for establishing collection lines is already under way than it would be to extend service to a completely new area (see IMPACTS ON ADJACENT JURISDICTIONS).

Remedial Action

Based on the lack of guaranteed wastewater treatment capacity, and the potential adverse economic impact of opening new residential development which will require expansion of services to a new area, Council recommends DENIAL of the LTC Ranch as proposed.

In order for the project to be reconsidered, the following remedial actions should be undertaken:

1. Develop a plan which guarantees the availability of wastewater service at the time of development and does not contemplate building without utility services.
2. Provide a plan of development which: 1) compliments existing residential development within the City of Port St. Lucie; and 2) provides for an orderly progression of development on the site.

CITY OF PORT ST. LUCIE

CONSERVE OUR WATER RESOURCES



UTILITY SYSTEMS DEPARTMENT

Cliff Burgess, Director

March 9, 1995

Ms. Cynthia A. Henderson
Annis, Mitchell, Cockey, Edwards & Roehn
One Tampa City Center Suite 2100
PO Box 3433
Tampa FL 33601

Re: LTC Ranch DRI

Dear Ms. Henderson,

Thank you for your letter of February 16, 1995 (copy attached) regarding availability of water and wastewater capacity for the referenced development. As we discussed with you and Mr. Glaubitz of BSE Consultants, Inc., this utility can make no commitment to provide water and/or wastewater capacity without a fully executed service agreement and plant capital charges having been paid. However, we will respond to your questions, numbered one (1) through five (5) as accurately as possible based on your projected phasing schedule, present available capacity, existing capacity reservations, scheduled plant expansions and future capacity consumption based on historical connection rates.

Water Facilities - Response to Question No. 1:

Table with 3 columns: Phase, Time, (1) Projected Excess Capacity MGD. Rows include phases I, II, III with corresponding years and capacity values.

(1) See Exhibit "A" to MOU - Attached

(2) Water plant expansion to 8.0 MGD 4/96 and assuming connection rate of 50 ERC'S/month at 250 GPD.

Water Facilities - Response to Question No. 2:

The above projected excess capacity includes reserved capacity as of February 1, 1995. No projected capacity reservations are included. Please see Exhibit "A" to MOU - Attached.

(1)

250 N.W. Country Club Drive • Port St. Lucie, FL 34986
Administration - (407) 871-5395 Technical Services - (407) 871-5435
Fax (407) 871-5480

"KEEP PORT ST. LUCIE BEAUTIFUL"

Water Facilities - Response to Question No. 3:

The utility confirms receipt of the proposed project water demand and supply exhibits contained in the DRI application.

Water Facilities - Response To Question No. 4:

Provisions for providing capacity for the proposed project if not available at the time the project requests capacity will be addressed in a Developer Service Agreement. Several options are available, i.e., the utility charges for water treatment facilities expansion or the project constructs a water treatment facility on-site and donates the facilities to the utility. Typical costs for new lime softening facility expansion is in the range of \$ 1.50 to \$ 1.75 per gallon and for new construction is in the range of \$ 1.50 per gallon.

Wastewater Facilities - Response to Question No. 1:

Wastewater service can be provided by the Northport WWTP or by construction of a wastewater facility on the project site. The permitted capacity of the NPWWTP is 1.000 MGD and the 12 month average day flow is 0.700 MGD. The present available capacity is 0.300 MGD. No capacity reservations presently exist. Projected excess capacity is not identified at this time for each phase, however excess capacity can be addressed in a Developer Service Agreement.

Wastewater Facilities - Response to Question No. 2:

No commitments presently exist for wastewater capacity at the NPWWTP.

Wastewater Facilities - Response to Question No. 3:

The utility confirms receipt of the proposed project wastewater flows and exhibits contained in the DRI application.

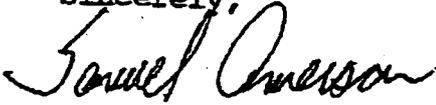
Wastewater Facilities - Response to Question No. 4:

Provisions for providing capacity for the proposed project if not available at the time the project requests capacity will be addressed in a Developer Service Agreement. Several options are available, i.e., the utility charges for wastewater treatment facilities expansion or the project constructs a wastewater treatment facility on-site and donates facilities to the utility. Typical costs for the wastewater facility expansion is in the range of \$ 2.50 to \$ 3.00 per gallon and for new construction is the range of \$ 2.25 to \$ 2.50 per gallon.

Hopefully this information will provide the necessary documentation that the Port St. Lucie Utility Systems Department can and will

provide the water and wastewater service to your proposed project at such time as service is requested.

Sincerely,



Samuel T. Amerson, P.E.
Utilities Engineer

STA/kat

cc: Cliff Burgess - Utility Systems Director
John Moulton - Florida Department of Environmental Protection
Scott Glaubitz, P.E. - BSE Consultants, Inc.
Ken Johnson - System Planning Coordinator
File - 11.054

(3)

PARKS AND RECREATION

Issue

The development may create a burden on existing recreation facilities and services if they are not provided concurrent with demand and in close proximity to residents.

Policy

Regional Policies 10.4.1.1 and 10.4.1.3 address the location and development of parks and recreation areas in ways which provide access opportunities to all segments of the population. Regional Policies 16.1.1.1, 16.1.1.2, 17.1.1.1, and 17.2.1.1 require that necessary public facilities and services, including recreation, be in place to serve new development concurrent with demand for such facilities.

Discussion

The ADA describes a process by which parks may occur on the property, however, there is no commitment or guarantee they will be located within a residential community.

With a potential Phase 2 population of 6,250, including over 1,000 school age children, LTC Ranch needs to provide and plan for a variety of recreational and gathering places on site. The ADA does not describe how these places and facilities will be provided in the context of the development. There is no indication of what types of recreational places will be provided, how these public spaces will be located in relationship to residential areas, what population they will serve, and how accessible they will be to various segments of the population.

The area around LTC Ranch is currently unserved by parks and recreation facilities (see Map PR-1). The City of Port St. Lucie recently completed a Master Plan for Parks and Recreation. As a result of this plan, the City will be providing park and recreation facilities in the vicinity of LTC Ranch. Given the potential population of LTC Ranch and its lack of proximity to the existing County park system, proper park planning within the DRI will be necessary to avoid unanticipated impacts on the City's park system.

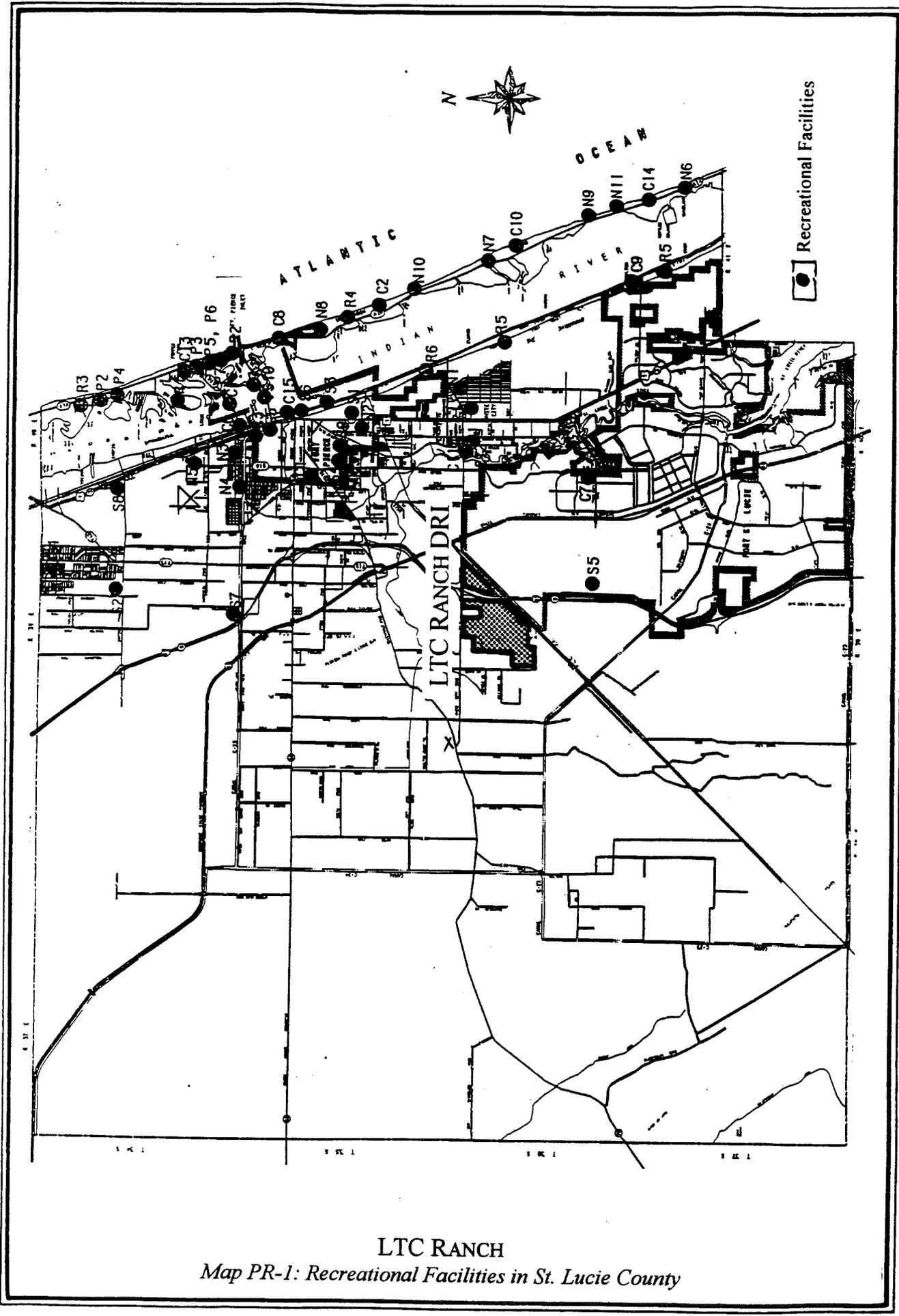
The master plan for LTC Ranch should at minimum provide for and locate an on-site system of community, neighborhood, and "mini"-parks consistent with the County's Level of Service standard for parks. The location and distribution of these parks should be such that no resident is more than one quarter mile from a public green space or recreational area. The park system should be well-connected by the internal transportation network so that it is accessible by all modes of transportation and by all segments of the population.

Remedial Action

Based on the lack of a master plan which reserves sufficient open places for adults and children, locates them in proximity to residents, and connects them for access to all segments of the population, Council recommends DENIAL of LTC Ranch as proposed.

In order for the project to be reconsidered, the following remedial action should be undertaken:

1. Prepare and submit a master plan which adequately addresses the issues discussed in the PARKS AND RECREATION section of Council's Assessment Report for the LTC Ranch DRI.



LTC RANCH
 Map PR-1: Recreational Facilities in St. Lucie County

PUBLIC FACILITIES AND SERVICES

“The regional planning agency . . . shall prepare and submit to the local government a report and recommendation on the regional impact of the proposed development. In preparing its report and recommendations, the regional planning agency shall identify regional issues . . . and make recommendation to the local government on these issues.”

Section 380.06, Florida Statutes

DISASTER PREPAREDNESS AND RECOVERY

Issue

The LTC Ranch proposal does not support State, regional, and local efforts to improve natural or man-made disaster preparedness or recovery within the Region. The LTC Ranch proposal does not further the goal of ensuring and enhancing the safety of the Region's citizens.

Policy

Regional Goal 7.2.1 is to ensure the safety of citizens and decrease the chance of property damage in the event of natural or man-made disasters. Regional Policies 7.2.1.2 and 7.2.1.4 instruct that the Region's traffic system shall be adequate for safe and timely evacuation during natural or man-made disasters. Regional Policy 7.2.1.6 states that DRIs which occur in areas of potential natural and man-made disasters will be reviewed for such safety factors as adequacy of shelters for residents, the ability of surrounding roads to accommodate emergency traffic, and the ability of internal roads to accommodate emergency traffic.

Discussion

The LTC proposal does not include a master plan which allows evaluation of these issues for consistency with the RCPP and State Plan.

Florida has had more recorded landfalls of major hurricane storm events (Category 3 or greater) than any other state in the nation. The frequency of hurricane events over the period of record is such that any given area in Florida can expect to be in the path of a hurricane every 18 months. Expressed another way, the Treasure Coast Region has about a one in seven or 14 percent chance of experiencing the effects of a hurricane in any given year.

For many years hurricane experts and emergency planners were primarily concerned with and most prepared for the effects of coastal storm events; lethal ocean storm surge and resultant structural damage, coastal and floodplain inundation, and inland flooding due to a hurricane's abnormal rainfall rates. It was presumed that coastal areas would sustain the greatest damage and loss of life, whereas the inland areas would fare better and provide relatively safe havens for evacuees. However Hurricane Andrew, which struck Dade County in August 1992, prompted a reevaluation of existing emergency plans.

Andrew defied the conventional wisdom regarding hurricanes because damage from the storm's tidal surge was minor compared to what inland areas experienced. Inland winds

gusted to over 155 miles per hour and dozens of internal tornadoes were spawned. Now emergency management planners believe that the memory of Andrew will prompt far greater numbers of inland residents to leave their homes and seek safe local shelter or evacuate the Region. It is likely that many LTC residents will seek shelter outside their homes in the event of a natural or man-made disaster.

The number, location, mix, and type (e.g., mobile homes are a possibility) of residential units are not known for LTC Ranch. Therefore, the demands LTC residents will place on the County's public shelter system cannot be reliably estimated. This is critical because currently St. Lucie County (as are all south Florida counties) is operating under deficit shelter conditions and may not have adequate shelter capacity to house the existing at-risk population.

If we assume all construction will be conventional and that the permanent resident population will be 6,250 persons, then approximately 1,125 persons (18 percent) in LTC Ranch are likely to seek public shelter locally. This number will be higher if mobile homes are constructed, or additional residential units are approved through conversion from other land uses. The demand for public shelter space must somehow be mitigated. The area around the site is not served by a well-defined grid of streets and the closest primary shelters (Fort Pierce Central High School and Parkway Elementary School) are approximately six and nine road miles away from the center of the property.

Perhaps the most important lesson Hurricane Andrew taught emergency planners is that good community design and an efficient internal street network within the community greatly enhances the success of post-disaster relief and recovery efforts. Many of the communities hardest hit by Andrew were served by limited ingress and egress routes and had no recognizable community or neighborhood center which could serve as logical and strategic locations for disaster relief stations. Many of those areas also suffered from a lack of public buildings, which again could have served as logical community sites for shelters, or medical and food distribution centers. Many segments of the disjointed road networks were blocked after the storm, with few alternative routes in or out of the devastated areas. The lack of centralized neighborhood locations (e.g., neighborhood commons or public squares) hampered the efforts of relief workers to set up medical and food stations in an efficient manner.

The location of public shelters and the roadway network which serves them affects the ability of citizens to access them safely and efficiently. Public shelters are normally schools and other public or community buildings. The LTC Ranch proposal does not reserve sites for any such buildings

and they are not considered in the mix of land uses proposed in the ADA. The LTC Ranch proposal provides no street network for the development and shows only one way in and out of the largest portion of the property. If any segment of this main route becomes blocked during an emergency, evacuation efforts and public safety will be unnecessarily jeopardized. The LTC Ranch proposal fails to address any potential post recovery obstacles in its plan for the property.

The LTC Ranch proposal should provide for a level of planning which: 1) strategically locates and reserves sites for public buildings; 2) increases and better defines the internal network of streets; 3) organizes development parcels around a centrally located public open space; 4) addresses the demand for emergency public shelter space; and 5) provides reasonable certainty regarding the number of people who will be living there (i.e., potential evacuees), and what kind of building types they will be living in.

At a minimum, St. Lucie County should require that this level of detail be provided in the master plan for LTC Ranch. Without such information contained in a plan for the property, Council cannot determine consistency of LTC's proposal with the RCPP and State Plan.

Remedial Action

Based on the significant potential regional impact to the emergency shelter system, lack of adequate public shelter space, and the lack of adequate mitigation measures and planning to facilitate an evacuation and post disaster recovery efforts, Council recommends DENIAL of LTC Ranch as proposed.

In order for the project to be reconsidered, the following remedial action should be taken:

1. Prepare and submit a master plan which adequately addresses the regional issues discussed in the DISASTER PREPAREDNESS AND RECOVERY section of Council's Assessment Report for the LTC Ranch DRI.

EDUCATION

Issue

The school board cannot make reasonably accurate student growth projections to use in planning new schools without a master plan of development. This inability to determine how many students can be expected also hinders the State process for planning and budgeting school sites and permanent facilities. The opportunity to encourage development of neighborhood schools and reduce the need for busing through thoughtful planning of a large area will also be lost.

Policy

Regional Goal 1.1.1 is to improve student performance and produce more highly educated citizens and a more skilled labor force. Regional Goal 1.3.2 is to assure future school sites are optimally located and facilities are constructed concurrent with demand. Regional Policy 1.3.2.1 states that school boards should work with local governments to assure future school sites are optimally located and facilities are constructed concurrent with demand. Regional Goal 17.2.1 is to efficiently provide for public services concurrent with need. Regional Policy 17.2.1.2 states service areas and costs of facilities associated with projected or planned land uses shall be identified and calculated.

Discussion

The information contained in the ADA does not allow for reasonable student population projections to be made. The ADA proposes to address the provision of school sites and/or other mitigation for the demand created, on a parcel by parcel basis at the time of site plan review.

Improving the performance of students within the Region not only benefits the students, but provides the labor market with a more highly educated and skilled labor force. The real and perceived quality of the overall school system has an effect on the power of St. Lucie County and the Region to attract new businesses and major employers. A major factor affecting student performance and school system quality is the availability of safe, comfortable classroom space.

The school board must go through a budgeting and planning process every five years with the State Department of Education. The five-year facility needs plan considers approved and proposed development plans in addition to current population. The more precise and certain these development plans are the more likely the State will be to consider them in the needs plan. This state planning process is used to arrive at local facility construction and renovation needs and is used by the State in its funding

allocation for each county. Depending on the facility, it may take from two to four years to get a new school built.

Portable and crowded classrooms are certainly not the preferred setting for educating children. Unfortunately, approximately twenty-five percent of the classroom space in the County is currently provided by portables. Existing schools in St. Lucie County are almost uniformly at or over capacity if portable units are excluded from capacity calculations. This situation underscores the importance of practicing and requiring more precision in our planning.

LTC Ranch is requesting extreme flexibility in how the property is developed once the DRI is approved. One scenario of development would generate enough school age children to require construction of two elementary schools, one half of middle school and one half of a high school. Another proposed scenario would be development of the property in a manner that would generate no school children. Given the many possible scenarios for development, it is impossible for the school board to rely on the LTC Ranch proposal in its planning for school sites (see Exhibit ED-1, letter from the School Board of St. Lucie County).

Given the inability to project where the demand for schools will occur, the conservative choice for the school board is to locate schools in the most central sites. This approach, however, may unnecessarily increase busing. The provision of neighborhood schools is generally desirable in a community. As such, policies and efforts have been advanced by Council towards developing a system of neighborhood schools. Opportunities for advancing the concept of neighborhood schools are greatly reduced if not eliminated when development is allowed to occur in an unpredictable piecemeal fashion. The void created by the missing master plan unnecessarily increases unpredictability and provides little guidance regarding the project's impact on the school system.

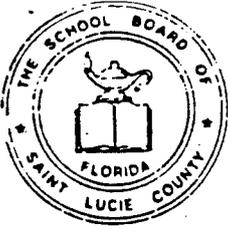
Remedial Actions

Based on the lack of a master plan which would: 1) address the provision of a permanent school facilities concurrent with demand; 2) further the School Board of St. Lucie County's efforts to desegregate the school system; 3) encourage the concept of neighborhood schools; and 4) reduce the effects of busing on children and its monetary costs to the public, Council recommends that LTC Ranch be DENIED as proposed.

In order for the project to be reconsidered, the following remedial action should be undertaken:

1. Prepare and submit a master plan which adequately addresses the regional issues discussed in the EDUCATION section of the Council's Assessment Report for the LTC Ranch DRI.

DAVID MOSRIE
Superintendent



EXCELLENCE IN EDUCATION

THE SCHOOL BOARD OF ST. LUCIE COUNTY

2909 Delaware Avenue
Fort Pierce, Florida 34947-7299

(407) 468-5000

BOARD MEMBERS
Tom Coss, Chairman
Samuel S. Gaines, Vice Chairman
Karen Knapp
Judi Miller
Connie Ostrowski

June 14, 1993

Mr. Morris A. Crady
Thomas Lucido & Associates, P.A.
322 Georgia Avenue
Stuart, FL 34994

Dear Mr. Crady:

RE: LTC Ranch

In response to your letter of June 2, 1993, without a specific development plan service requirements cannot be established. Your client's method of assuring the provision of adequate school facilities and services includes no commitment, but as a general and preliminary outline we have no objection to the proposal. As Dr. Phillips stated in his letter of March 30, 1992 "There is a county impact fee for residential housing".

The development of 2455 acres could have a significant impact on the school system. Based on your intended market what is your demographic projection? The development schedule is 1000 units in the year 1995 to 2000, 1500 units form 2001 to 2005 and 4000 units between 2006 and 2020.

A copy of our enrollment projections is included. We are in the process of extending the horizon ten years. A new elementary school is planned next year. An elementary and a middle school are due the following year and a high school the year after that, funds permitting.

This letter will allow you to proceed at the regional level. Approval or objection is reserved until more detailed plans are submitted at the local level.

Yours truly,

Lamar Powers
Executive Director of Facilities
and Support Services

b

cc: Dr. Mosrie
Dan Harrell

ACCREDITED SYSTEM-WIDE BY THE SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS

The School Board of St. Lucie County is an Equal Opportunity Agency

	92-93	93-94	94-95	95-96	96-97	97-98
K-5	11,960	12,478	12,873	13,210	13,216	13,409
6-8	5,009	5,321	5,672	5,966	6,559	6,781
9-12	5,443	5,639	5,821	6,147	6,559	6,984
SUB TOTAL	22,412	23,438	24,366	25,323	26,334	27,174
EXCEP. EDUC.	1,328	1,475	1,582	1,696	1,803	1,911
TOTAL*	23,740	24,913	25,948	27,019	28,137	29,085

*Does not include Pre-K - 1/93 enrollment - 385

OTHER ISSUES

"The regional planning agency . . . shall prepare and submit to the local government a report and recommendation on the regional impact of the proposed development. In preparing its report and recommendations, the regional planning agency shall identify regional issues . . . and make recommendation to the local government on these issues."

Section 380.06, Florida Statutes

FISCAL IMPACT AND CONCURRENCY

Issue

The LTC Ranch proposal makes a reasonable estimate of facility costs impossible to calculate. The development may create a burden for the provision of a full range of necessary public facilities and services if such facilities and services are not available concurrently with development.

Policy

Council Goal 16.1.2 calls for a balanced, well planned, compatible mix of land uses to be appropriately located. Council Policy 17.2.1.2 requires that service areas and costs of facilities associated with projected or planned land use shall be identified and calculated. Council policy requires that necessary public facilities and services be in place to serve new development concurrent with demand for such services and facilities (RCPP 16.1.1.1, 16.1.1.2, 17.1.1.1, and 17.2.1.1).

Fiscal Impact

The total buildout value of the LTC DRI is difficult to project since the ADA proposes an extremely flexible plan for development. Projections of fiscal impact are always difficult. Council has recently taken the approach of evaluating the net fiscal impact of a proposed project as if it were built today. This allows for an evaluation of whether the net fiscal impact is positive, negative, or neutral without having to speculate on a number of future conditions. In the case of LTC Ranch, it is not possible to do such an assessment since the uses cannot be predicted with any accuracy.

Concurrency

The ADA indicates that agreements will be entered into with service providers for provision of water and wastewater, and other concurrency provisions will be met consistent with local ordinance. Certain types of services, however, require a longer planning time if they are to be provided when needed (see EDUCATION and PARKS AND RECREATION)T.

The proposal for handling transportation impacts (see TRANSPORTATION) does not guarantee that roadway capacity will be provided concurrent with demand because it does not take into account previously approved projects.

Because a land use mix has not been determined for the project it is difficult to determine what public facilities and services will be needed, when they will be needed, and

how much they will cost. The LTC Ranch proposal makes it impossible for the County to do a reasonable level of capital improvements planning and concurrency management. Approving a development of this magnitude should be done with a clear understanding of: 1) whether it will be a fiscal winner or a loss leader for local government; and 2) whether or not local government can afford to service it. The LTC Ranch proposal does not provide enough information to answer these fundamental questions.

Remedial Action

Based on the lack of a master plan and a development program that allows for some reasonable assessment of fiscal impact and concurrency implications, Council recommends DENIAL of LTC Ranch as proposed.

In order for the project to be reconsidered, the following remedial actions should be undertaken:

1. Prepare and submit a master plan and development program which adequately addresses the regional issues discussed in the FISCAL IMPACT AND CONCURRENCY section of Council's Assessment Report for the LTC Ranch DRI.

THE ELDERLY, CHILDREN AND FAMILIES

Issues

Development should further the Regional Goals which strive to increase and prolong the independence and self sufficiency of the elderly, children, and families.

Policy

Regional Goal 4.2.1 is to increase the elderly's ability to be independent and self-sufficient. The special housing and transportation needs of the elderly are recognized in Regional Policies 4.2.1.1 and 4.2.1.2. The importance of providing for community based care for the elderly and children is recognized in Regional Policies 4.3.1.2, 4.3.1.3, 2.6.1.2 and 2.6.1.5. The positive effects on families of providing employment opportunities close to affordable housing is recognized in Regional Policy 2.2.1.6.

Discussion

Three classes of older residents are generally recognized: 1) the self-sufficient elderly who are in good physical and mental health, have adequate economic resources and live independently; 2) the partially self-sufficient; and 3) the dependent elderly, a small but growing part of the Region's elderly.

A common milestone in loss of independence for the elderly is when one can no longer drive a car. The separation in living opportunities between those who can drive and those who cannot can be reduced by thoughtful design. Conventional development patterns with separation of land uses through physical barriers or distance almost confines the nondrivers to their houses rendering them dependent on relatives, friends, or, increasingly, public transportation services to meet their daily needs. Community design, therefore, has a critical effect on the elderly and can have economic repercussions for all.

The LTC Ranch ADA does not describe how the development will address the special needs and problems of the elderly who may be living there. Left unanswered are: 1) the proposed relationship between land uses (e.g., quantified mix of uses within a parcel and physical relationship between uses); 2) the types of housing to be provided; 3) master plan illustrating or commitment to providing connection of one land use to another; 4) where or if sites will be reserved for public service buildings; and 5) what types of recreational opportunities will be provided.

Specific recommendations to encourage independence of the elderly include: 1) providing a network of quiet streets,

sidewalks and central squares or greens which will facilitate walking to reach needed destinations; 2) providing a mix of housing types and affordabilities; 3) allowing for a mix of community commercial and residential uses so that daily needs may be met at very short distances from home; and 4) reserving sites for public facilities, including potential community services.

Although not specifically addressed in the RCPP, children and youths too young to drive can benefit from the same community design considerations as the elderly.

A minimum level of planning is needed on the part of LTC Ranch that allows for a fair assessment of how well the development will respond to the special needs and problems of the elderly living there and that allows for a determination of consistency with the RCPP and State Plan.

Remedial Action

Based on the failure to address Council's goals and policies related to the special needs of the elderly, Council should recommend DENIAL of LTC Ranch as proposed.

In order for the project to be reconsidered, the following remedial action should be undertaken:

1. Prepare and submit a master plan which adequately addresses the issues discussed in the ELDERLY, CHILDREN AND FAMILIES section of the Council's Assessment Report for the LTC Ranch DRI.

APPENDIX A

**SOUTH FLORIDA
WATER MANAGEMENT
DISTRICT**

ASSESSMENT REPORT

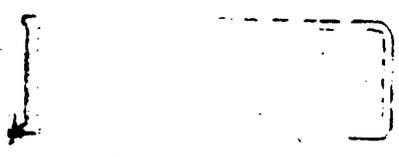


South Florida Water Management District

3501 Gun Club Road • P.O. Box 24680 • West Palm Beach, FL 33416-4680 • (407) 686-8800 • FL WATS 1-800-452-2143

LAN 01

December 15, 1993



TRC...
PLANNING...
REGULATION

Mr. Michael Busha, DRI Coordinator
Treasure Coast Regional Planning Council
3228 S.W. Martin Downs Blvd., Suite 205
Palm City, FL 33490

Dear ^{Michael} Mr. Busha:

**Subject: LTC Ranch, DRI No. 92-382
Revised Impact Assessment Report**

Enclosed is a copy of the District's revised Impact Assessment Report for the above subject project. Page one of the report has been revised to reflect the latest information provided by the applicant on the project's proposed phasing and development program. Page twelve of the report (see footnote no. 2) has been modified to include additional information on water table monitoring requirements.

If any of the above requires additional clarification, please do not hesitate to contact me at 687-6862.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jim", located below the word "Sincerely".

James J. Golden, AICP
Senior Review Coordinator
Regulation Department

JJG/cah
Enclosure

c: Morris A. Crady, Thomas Lucido & Associates
Cynthia A. Henderson, Esq.

Governing Board

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Thomas K. MacVicar, Deputy Executive Director

IMPACT ASSESSMENT REPORT

Prepared by

South Florida Water Management District

Issued December 6, 1993
(Revised December 15, 1993)

I PROJECT SUMMARY

Project:	LTC Ranch
Developer:	LTC Joint Venture
SFWMD ID No:	92-382
Location:	Sections 1,2,3,4,9,10,11,15&16/Township 36 South/ Range 28 East, St. Lucie County
Size:	+2,455.021 acres
Existing Land Use:	Wetlands, Pasture, Row Crops, Open Land, Exotics, Lakes
Proposed Land Use:	Mixed-use Development consisting of Residential (6,500 dwelling units), Industrial (1,960,200 square feet), Retail (725,000 square feet), Office (1,508,500 square feet)
DRI Thresholds:	Residential (1,000 dwelling units), Retail (400,000 square feet), Office (300,000 square feet), Industrial (320 acres)

II GENERAL PROJECT-RELATED INFORMATION

The LTC Ranch DRI is a ±2,455.021 acre mixed-use development located in east-central St. Lucie County along Interstate 95. The project site is bounded on the north by Midway Road, on the east by Glades Cut-Off Road, and on the west by McCarthy Road. The proposed Palmer Expressway bisects the project site in an easterly/westerly direction (see Exhibit 1). The Reserve and St. Lucie West DRI's are located to the southeast across Glades Cut-Off Road.

The Master Development Plan (see Exhibit 2) proposes to accommodate the following land uses: Single-Family Residential (4,450 dwelling units), Multi-Family Residential (2,050 dwelling units), Industrial (1,960,200 square feet), Retail (725,000 square feet), and Office (1,508,500 square feet). The project is proposed to be developed in three phases (1995-2000, 2001-2005, 2006-2020) with two different development scenarios proposed for Phase I. Under Scenario 1, development would occur entirely east of Interstate 95 within Parcels 1 and 2. Under Scenario 2, development would be dispersed throughout Parcels 1, 2, 3, 4, and 5.

At this time, the applicant is seeking DRI approval for Phases I and II only. Phase III is shown for informational purposes and will require further DRI review prior to development of this phase.

III POTENTIAL FOR ADVERSE REGIONAL IMPACTS SUMMARY

<u>Category</u>	<u>Minimal</u>	<u>Significant</u>	<u>Major</u>
<u>Surface Water Management - Quantity</u>		X	
<u>Surface Water Management - Quality</u>		X	
<u>Water-Related Vegetation/Wildlife</u>		X	
<u>Water Use</u>		X	

IV CONCLUSIONS AND RECOMMENDATIONS

In reviewing the information provided, District staff cannot confirm at this time that the proposed LTC Ranch DRI could be developed in such a manner that regional adverse water resource-related impacts would not be likely to occur with regard to surface water management quantity and quality, water-related vegetation/wildlife, and water use (see the summary, checklist, and footnotes for each of these areas for additional details). This conclusion is based on the preliminary nature of the design information submitted, the size and scope of the proposed project, the extended 25 year buildout period, and the applicant's desire to submit detailed development design plans at a future date. Consequently, it will be necessary for the applicant to submit substantially more detailed information at the time of permit application.

Surface Water Management

The existing agricultural activities have been permitted by the District (Permit No. 56-00118-S/W). The project site is drained by a network of agricultural drainage ditches. Some of these ditches overflow into North St. Lucie Water Control District (NSLRWCD) canals. The NSLRWCD system drains into Ten Mile Creek which is a tributary of the North Fork of the St. Lucie River.

The proposed surface water management system will consist of a network of lakes and wetlands with overflow potential when the 25 year/3 day flood elevation is attained. One-half inch of dry pretreatment will be provided for all commercial and industrial areas prior to discharge into the lakes or wetlands. In addition, any other development that discharges directly into wetlands will also be required to provide one-half inch of dry pretreatment. Discharge from the site will occur through a network of swales or culverts into the ditches along Glades Cut-Off Road. These ditches eventually drain into Ten Mile Creek and the North Fork of the St. Lucie River. The St. Lucie River is classified as an Outstanding Florida Water (OFW).

For additional details concerning the above, see the Surface Water Management checklist and footnotes on pages 9 and 10.

Water Related Vegetation/Wildlife

The project site contains approximately 165.7 acres of wetlands, the majority of which are wet prairies. A lesser acreage of non-forested freshwater marsh wetlands also occur on site. Approximately 85% (141.1 acres) of the project's wetlands are proposed for preservation.

Issues remaining to be resolved prior to the issuance of a surface water management Letter of Conceptual Approval include: (1) Verification of the proposed wetland impacts; (2) Submittal of a mitigation plan; and (3) Verification that the proposed control elevations and the proximity of the lake excavations/surrounding land uses are compatible with wetlands protection.

For additional details concerning the above, see the Environment checklist and footnotes on pages 11 and 12.

Water Use

Potable water supply is proposed to be provided by the St. Lucie County Utilities Department. Non-potable water demands for landscape irrigation will be met by withdrawals from Surficial Aquifer wells and the project's on-site lakes. The applicant indicates that reclaimed water will be utilized in the future if and when it is made available by the St. Lucie County Utilities Department.

Although the project site is located within Planning Area 3 of the County's draft Water and Wastewater Plan and the utility indicates that adequate capacity has been planned for future growth in the project area, the DRI project site currently lies outside of the utility's permitted service area. Consequently, a modification to the utility's public water supply water use permit will be required. Issues that must be resolved prior to approving any increase in withdrawals from the Surficial Aquifer include environmental impacts, proximity to pollution sources, saline water intrusion, and competition with other existing legal users for the available resource. The District recommends that the applicant and the utility pursue other alternatives (such as increased conservation measures and development of the Floridan Aquifer) to meet the demands of this project and other future proposed development in the vicinity.

Since the project's development design plan has not yet been finalized, the project's irrigated acreage and irrigation demand may change. For these reasons, the applicant was unable to provide the proposed locations of the irrigation wells. This information is required in order for District staff to perform an evaluation of the potential for adverse impacts to the environment and other existing legal users for the available resource.

District staff are concerned about the capability of the Surficial Aquifer and the on-site lakes to meet the project's long-term demands without resulting in adverse environmental/resource impacts on and in the vicinity of the project site. Consequently, District staff strongly recommend that the applicant reduce dependence on limited ground and surface water supplies by pursuing other alternatives, such as reclaimed water and water conservation measures, to the greatest extent possible.

For additional details concerning the above, see the Water Supply and Development checklist and footnotes on pages 6, 7 and 8.

The District is recommending a Development Order Condition (see below) requiring that specific conservation measures be incorporated into the project design.

Permits

This project will require the following District permits prior to commencement of construction:

1. Surface Water Management Permit - for conceptual approval and for construction and operation of the project's surface water management system.
2. Water Use Permit - for the proposed ground and surface water withdrawals for landscape irrigation.

This project may require the following District permits prior to commencement of construction:

1. Water Use Permit - for certain dewatering activities proposed for the construction of project lakes and/or road or building foundations.

The applicant must provide verification that the proposed system designs will meet District criteria in effect at the time of permit application.

Recommended Development Order Condition

1. For the purpose of potable water conservation, LTC Ranch shall utilize ultra-low volume water use plumbing fixtures, self-closing and/or metered water faucets, and other water conserving devices/methods consistent with the criteria outlined in the water conservation element of the St. Lucie County Utilities South Florida Water Management District Water Use Permit or the water conservation element of any other approved utility provider.

V DISCLAIMER

This review has been performed by South Florida Water Management District to provide the Treasure Coast Regional Planning Council with a general technical assessment of the water-related impacts of this project from the District's perspective. It is a technical review of the project based on the information provided by the DRI applicant. It is not a permit under Chapter 373, F.S., nor is it a commitment for said permits. This review does not constitute final agency action and it is not binding on this agency. Permit evaluation, pursuant to Chapter 373, F.S., will be based upon the criteria in effect and the information available at the time of permit application. Consequently, the applicant is advised that this could result in a change in the District's technical assessment from that which is contained in this review.

Further, this review is not intended to restrict any formal District comments and/or objections that may be issued in the future on a proposed comprehensive plan amendment(s) in connection with this DRI. During the formal plan amendment review process, pursuant to Chapter 9J-5, F.A.C., the District will perform a detailed evaluation of all water resource-related issues associated with this proposal and will provide its formal comments and/or objections to the Florida Department of Community Affairs (DCA).

SUBJECT: WATER SUPPLY AND DEVELOPMENT - LTC Ranch, DRI No. 92-382

Proposed Potable Water Source: St. Lucie County (North Port System)
 Permit No.: 56-00142-W Expiration Date: 09/12/96
 Permitted Allocation: 2.15 BGY (5.9 MGD) Current Usage: 3.7 MGD
 Projected Demand of DRI: 837,000 GPD (0.838 MGD)

Proposed Non-Potable Water Source: Surficial Aquifer wells/on-site lakes
 Projected Demand of DRI: 1.703 MGD

	ACCEPTABLE RESPONSE IN APPLICATION	RESOLVABLE AT PERMIT TIME		MAJOR REGIONAL ISSUES
		MINOR	MAJOR	
I. PROJECTED DEMANDS OF PROJECT				
A. POTABLE WATER				
1. Use Generation Rates	X			
2. Conservation Practices	X(1)			
B. NON-POTABLE WATER				
1. Use Generation Rates		X(2)		
2. Conservation Practices	X(1)			
3. Wastewater Reuse	X(3)			
II. WATER USE IMPACTS				
A. ON-SITE				
1. Proposed Sources				
a. Groundwater		X(4)		
b. Surface Water		X(4)		
c. Wastewater Re-use	N/A			
d. Reverse Osmosis	N/A			
2. Resource Capability		X(4)		
3. Impacts				
a. Salt Water Intrusion	N/A			
b. Pollution/Contamination	X			
c. Environmental			X(4)	
B. OFF-SITE				
1. Verification of Availability from Utility				
			X(5)	
2. Resource Capability				
			X(5)	
3. Impacts				
a. Salt Water Intrusion			X(5)	
b. Pollution/Contamination			X(5)	
c. Environmental			X(5)	
d. Other Legal Users			X(5)	

FOOTNOTES: See following page.

WATER SUPPLY AND DEVELOPMENT FOOTNOTES:

- (1) In the November 10, 1993 Sufficiency Response, the applicant states that "water conservation measures will be encouraged to be implemented by the developers." Examples listed by the applicant include flow restrictors for faucets and showers, water saving toilets, moisture-sensing devices, etc. The applicant also states that "Xeriscaping techniques will be recommended."

The District is recommending a development order condition requiring that specific water conservation measures be utilized in the project design (see section of report entitled "Recommended Development Order Conditions")

- (2) The applicant has indicated an average day demand of 1.703 MGD for non-potable water supply for irrigation. Due to the fact that the project plan has not been finalized, the irrigated acreage and the irrigation demand may change.
- (3) In the November 10, 1993 Sufficiency Response, the applicant states that "use of reclaimed water for irrigation shall be the preferred source, if available, from the North Port St. Lucie wastewater treatment plant." The use of reclaimed water for irrigation will reduce demands on limited ground and surface water sources and lessen the risk of adverse impacts to the environment and other users.
- (4) The applicant indicates that since the project plan has not been finalized, it is not possible to provide the proposed irrigation well locations for an evaluation of the potential for adverse impacts to environmental features and competition with other existing legal users for the available resource. The applicant also indicates that the existing Floridan Aquifer wells used for the current agricultural activities at the project site will be abandoned and the withdrawals for the proposed project will come from the proposed Surficial Aquifer wells and the proposed on-site lakes.

District staff are concerned about the capability of the Surficial Aquifer and the on-site lakes to meet the project's long-term demands without resulting in adverse environmental/resource impacts on and adjacent to the project site. Consequently, District staff strongly recommend that the applicant reduce dependence on limited ground and surface water supplies by pursuing other alternatives, such as reclaimed water and water conservation measures, to the greatest extent possible.

- (5) Verification of the availability of potable water from the off-site utility was supplied by the applicant in the form of a letter from St. Lucie County stating the project is within Planning Area 3 of the draft Water and Wastewater Master Plan and that adequate capacity has been planned for the future growth in the project area. However, the service area for St. Lucie County Utilities Public Water Supply (according to Exhibit 2 of the staff report for Water Use Permit No. 56-00142-W issued on April 15, 1993) does not extend west of Glades Cut-Off Road and does

not include the DRI project site. In order to include the project in the service area, Water Use Permit No. 56-00142-W must be modified. Issues to be resolved prior to approving an increase in St. Lucie County's permitted allocation include environmental impacts, proximity to pollution sources, saline water intrusion, and competition with other existing legal users for the available resource.

The Floridan Aquifer is a potential source of water to meet the project's potable water demands. However, the County's draft Water and Wastewater Master Plan does not propose development of this water supply source at this time. Development of the Floridan Aquifer will require the use of reverse osmosis treatment in order to meet State drinking water standards.

SUBJECT: SURFACE WATER MANAGEMENT - LTC Ranch, DRI No. 92-382

Drainage Basin: North Fork of St. Lucie River
 Receiving Body: Ten Mile Creek via Glades Cut-Off Roadside Ditches

	ACCEPTABLE RESPONSE IN APPLICATION	RESOLVABLE AT PERMIT TIME		MAJOR REGIONAL ISSUES
		MINOR	MAJOR	

I. SYSTEM DESIGN

A. QUANTITY CONSIDERATIONS

1. Discharge method, location and route to receiving water			X(1)	
2. Floodplain encroachment	X			
3. Net basin storage	X			
4. Stage/storage				
5. Control elevations			X(2)	
6. Water management areas			X(3)	
7. Minimum drainage	X			
8. Overdrainage	X			
9. Outparcels	X			
10. Exfiltration	N/A			
11. Floor and road protection	X			
12. Passage of upstream flows	X			
13. Capacity of receiving water (pre vs. post)			X(4)	

B. QUALITY CONSIDERATIONS

1. Standard BMP's	X			
2. Special BMP's				
a. Sensitive receiving waters	N/A			
b. On-site use of wastewater				
c. Location of on-site percolation ponds			X(3)	
d. Proximity of on-site percolation ponds to SWM system			X(3)	
3. Use of natural system	X			
4. Hazardous materials				
a. Use/generation	N/A			
b. Management/disposal	N/A			
5. Exfiltration systems	N/A			

FOOTNOTES: See following page.

SURFACE WATER MANAGEMENT FOOTNOTES:

- (1) The following comments concerning the Master Drainage Plan must be addressed at the time of permit application:
 - a. Drainage Basin "B" is labeled Drainage Basin "D";
 - b. Drainage Basin "H" is not delineated;
 - c. There are three off-site discharge points into North St. Lucie River Water Control District canals which are not addressed in the surface water management description or calculations; and
 - d. The proposed drainage basin boundaries are not clearly delineated.
- (2) The preliminary control elevations for the surface water management system have been set one foot below existing ground for each basin consistent with the findings of the St. Lucie County Soil Survey. If the applicant desires to lower the proposed control elevation, a ground water table monitoring program must be implemented for a minimum one year duration and the data must be submitted at the time of permit application (see also footnote no. 2 under the Environment checklist).
- (3) The final locations of the water management areas (lakes) must be reflected in the plans submitted at the time of permit application. Please note that the District requires a 200 foot separation between protected wetlands and lake excavations unless calculations or other reasonable assurances are provided which demonstrate that the hydrologic regime of the protected wetlands will not be adversely impacted.
- (4) At the time of permit application, documentation from St. Lucie County will be required evidencing their approval of the proposed discharge into the Glades Cut-Off roadside ditches.

WETLANDS ACREAGE SUMMARY*

Total Existing	Presently Impacted	Proposed To Be Preserved	Proposed To Be Altered/Destroyed	Proposed To Be Mitigated	Resulting Net Gain/Loss
165.7	N/A	141.1	24.6	32.9	+8.3

* Applicant estimates (subject to verification during permit review)

	ACCEPTABLE RESPONSE IN APPLICATION	RESOLVABLE AT PERMIT TIME		MAJOR REGIONAL ISSUES
		MINOR	MAJOR	
I. EXISTING SENSITIVE LANDS				
A. WETLANDS				
1. Quantity	X			
2. Quality	X			
B. UNIQUE HABITAT	N/A			
C. ENDANGERED SPECIES	X			
D. OTHER (Save Our Rivers; OFWs; aquifer recharge areas; etc.)	N/A			
II. IMPACTS OF PRESERVATION/MITIGATION				
A. QUANTITY			X(1)	
B. QUALITY	X			
C. MANAGEMENT SCHEME (managed elevations, buffers, littoral zones; etc.)			X(2,3)	
D. ENDANGERED SPECIES/HABITAT	N/A			
III. COMPATIBILITY OF PROPOSED LAND USE AND NATURAL CHARACTERISTICS				
			X(4)	

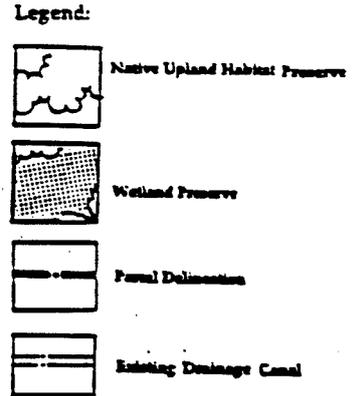
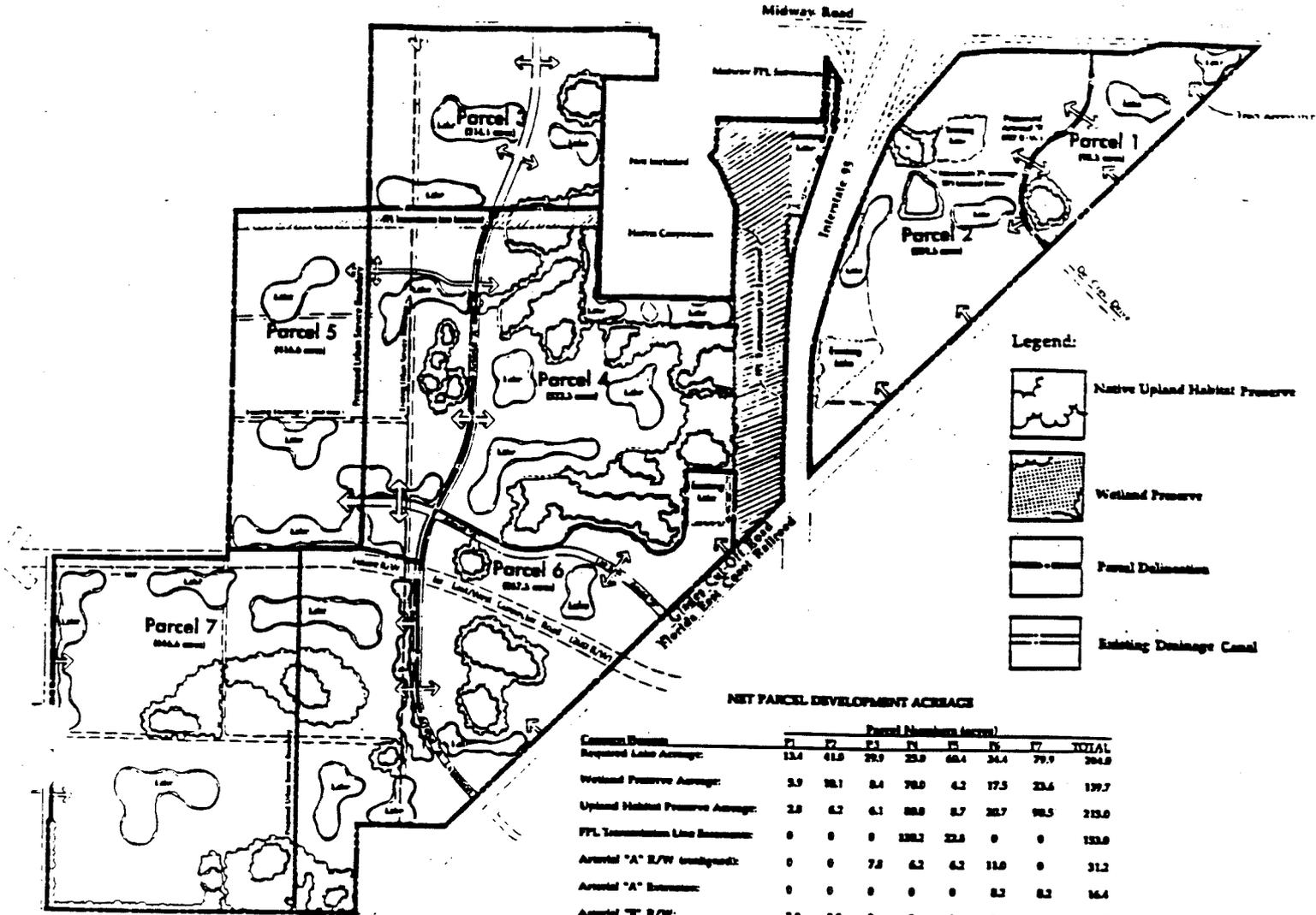
FOOTNOTES: See following page.

ENVIRONMENT FOOTNOTES:

- (1) Any proposed wetland impacts and any required mitigation will be evaluated when a Conceptual Approval application is submitted to the District for review. The proposed project will be evaluated using the criteria in effect at the time of permit application.
- (2) The applicant is proposing to control all of the on-site lakes at an elevation one foot below the surrounding natural ground elevation. This approach is consistent with the St. Lucie County Soil Survey for the soils within the boundaries of the LTC Ranch project. However, if the applicant desires to lower any of the control elevations, a water table monitoring program acceptable to the District must be implemented and the results submitted to the District for staff evaluation. Monitoring of the ground water tables in excess of one year may be required under such a plan.

Rainfall data obtained during the monitoring period should be included as part of any analysis performed by the applicant and submitted to the District for review. The data obtained from the water table elevation monitoring program and the rainfall data should be evaluated in conjunction with average seasonal rainfall and other hydrological data from the area in order to determine the appropriate project control elevations.

- (3) See footnote no. 3 under the Surface Water Management checklist.
- (4) The land uses surrounding any of the preserved wetlands or mitigation areas should be compatible with the wetland or mitigation areas. Mitigation should not be proposed in areas where adjacent land users may object to the mitigation areas (e.g., residential, commercial, etc.) or areas that may be detrimental to the wildlife utilizing the mitigation areas (e.g., roads, parking lots, heavy commercial/industrial, power lines, etc.). Natural wetland areas should not be surrounded by land uses which have a potential to either directly or indirectly impact the wetlands (e.g., water quality, air pollution, structural entanglements, etc.).



NET PARCEL DEVELOPMENT ACREAGE

Common Element	Parcel Number (Acres)							TOTAL
	P1	P2	P3	P4	P5	P6	P7	
Required Lot Area:	13.4	41.0	29.9	23.0	60.4	34.4	79.7	304.8
Wetland Preserve Average:	3.9	10.1	0.4	70.0	4.2	17.5	23.6	139.7
Upland Habitat Preserve Average:	2.0	6.2	6.1	80.0	0.7	20.7	90.5	215.0
FPL Transmission Line Encroachment:	0	0	0	130.2	22.0	0	0	152.0
Arterial "A" R/W (unimproved):	0	0	7.8	6.2	6.2	11.0	0	31.2
Arterial "A" Encroachment:	0	0	0	0	0	0.2	0.2	0.4
Arterial "B" R/W:	3.0	3.0	0	0	0	0	0	6.0
Land/Offsite Connector Road:	0	0	0	0	0	17.2	7.1	24.3
Total Common Area:	25.1	60.3	32.2	311.4	102.3	109.7	227.3	688.3
Net Development Average:	72.1	239.2	142.9	211.9	212.7	129.4	119.3	1,364.7
Gross Average:	92.2	299.5	214.1	322.3	416.0	207.3	646.6	2,053.0

NOTE: All acreage calculations are approximate.

revised: 10.26.93

ANTICIPATED DEVELOPMENT SCHEDULE

SCENARIO 1: Phase I To Occur Entirely Within Parcels 1 and 2 (East of I-95)

Phase	Parcel	RESIDENTIAL USES		NON-RESIDENTIAL USES		
		Single-family (units)	Multi-family (units)	Industrial (GLA)	Retail (GLA)	Office (GLA)
I	1.2	630	370	392,040	90,000	34,975
	3.4.5	0	0	0	0	0
	6.7	0	0	0	0	0
II	1.2	0	55	207,960	115,000	205,025
	3.4.5	645	300	302,160	100,000	109,730
	6.7	300	0	0	0	0
III	1.2	0	0	55,000	157,300	210,000
	3.4.5 & 6.7	2,875	1,175	975,000	262,300	246,730
Total	1-7	4,450	2,050	1,964,300	725,000	1,508,500

SCENARIO 2: Phase I Dispersed Throughout Parcels 1, 2, 3, 4, and 5

Phase	Parcel	RESIDENTIAL USES		NON-RESIDENTIAL USES		
		Single-family (units)	Multi-family (units)	Industrial (GLA)	Retail (GLA)	Office (GLA)
I	1.2	260	157	141,480	37,000	14,375
	3.4.5	370	218	230,800	52,000	20,000
	6.7	0	0	0	0	0
II	1.2	0	55	207,960	115,000	205,025
	3.4.5	645	300	302,160	100,000	109,730
	6.7	300	0	0	0	0
III	1.2	0	0	55,000	157,300	210,000
	3.4.5 & 6.7	2,875	1,175	975,000	262,300	246,730
Total	1-7	4,450	2,050	1,964,300	725,000	1,508,500

Open Space Summary

TOTAL PROJECT OPEN SPACE REQUIRED:	848.00 acres
OPEN SPACE PROVIDED:	862.64 acres
OPEN SPACE SURPLUS:	+14.64 acres

CONCLUSION: The total project's open space requirement 848.00 acres of gross land need has been met through the provision of various areas. Outside an open space is required within the first Parcel Development Area* except that which is necessary for required landscaping, road right-of-way, utility easements, drainage easements, etc.

*First Parcel Development Area equals total parcel area less stream channels including riparian and wetland preserve areas and proposed and existing lakes.

Total Project Open Space Data

St. Lucie County Applicable Open Space Requirement:	35% of Gross Land Area
TOTAL SITE AREA:	2,495 acres
Less Arterial "A" ROW (unimproved):	31,600
TOTAL	2,463 acres
PMUD OPEN SPACE REQUIREMENT:	848.00 acres
OPEN SPACE PROVIDED:	862.64 acres*
Wetland preserve:	379.0 acres
Upland preserve:	379.0 acres
Proposed/Existing lakes:	204.6 acres
FPL easements:	204.6 acres

*Includes additional 35% credit for native habitat per PMUD Ordinance.

Florida Department of
Environmental Protection

Lawton Chiles
Governor

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

Virginia B. Wetherell
Secretary

September 8, 1993

Mike

RECEIVED
SEP 10 1993

Mr. Michael Busha
Treasure Coast Regional Planning Council
P.O. Box 1529
Palm City, Florida

TREASURE COAST REGIONAL
PLANNING COUNCIL

Dear Mr. Busha,

After reviewing the LTC Ranch Sufficiency Response of August 16, 1993, I would like to offer the following comments.

Question #13 WETLANDS: Map F (Vegetation Associations and Existing Land Use) seems to indicate that there are existing wetlands with direct connections to the existing drainage ditches. These wetlands may be within the Department's jurisdiction. Within the ADA Text Replacement Pages under Mitigation Concept (page 13-10A), the applicant indicated that mitigation ratios for created wetlands and restoration would be based on South Florida Water Management District, Army Corps of Engineers and St. Lucie County requirements. The Department highly recommends that the applicant obtain a binding jurisdictional from the Department in order to distinguish jurisdictional wetlands from isolated wetlands, and in order to provide adequate mitigation ratios to the agencies involved in the wetlands resource permitting process.

Question #14 WATER: Apparently there has been a great misunderstanding regarding the recommended surface water, groundwater, and sediment parameters and stations in my 12/22/92 memorandum to Paula Hollihan of Consul-Tech Engineering, Inc. The chemical parameters and sampling stations were to be examined for the current DRI review process. In fact, it was the Department's intention that the sampling plan be conducted immediately after receipt of the plan. In the Sufficiency Response, the applicant stated that the sampling plan would be conducted at the time of construction. The sampling plan was put together so that all of the reviewing agencies would have a concept of existing environmental conditions on the site with regards to this question. The chemical parameters and sampling locations were particularly recommended to investigate past and on-going activities on the site. This information is essential to the review of the DRI. The applicant should conduct the surface water, groundwater, and sediment analysis as indicated in the sampling plan, and submit the results to the Regional Planning Council for distribution to the reviewing agencies.

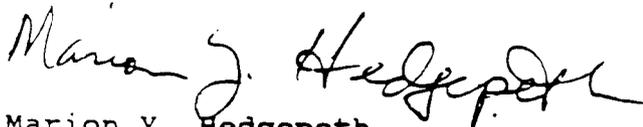
busha Letter 9/8/93
page 2 of 2

Questions #10, #17 and #18 (General Project Description, Potable Water and Wastewater): The Department still has concerns regarding potable water supply and wastewater effluent disposal within the service area of this proposed DRI. In May of 1992, St. Lucie County Utility Services Department experienced a major shortfall in water supply and storage capacity. Although the storage capacity problem is being addressed, water supply appears to be the limiting factor. South Florida Water Management District has stated that increasing water allocations to St. Lucie County Utility Services Department would involve environmental impacts with regards to the proximity of the wellfields to pollution sources, saline water intrusion, and competition with other existing legal users. St. Lucie County Utility Services Department would have to address the problem of wastewater effluent disposal. A cost effective means of effluent disposal should be identified prior to expansion of the Utility's service area. Also, in order to service LTC Ranch, St. Lucie County Utility Services Department would first have to meet the demands of the existing platted but undeveloped communities within the urban service area. Please provide documentation of commitment from the St. Lucie County Utility Services Department or other proposed off-site supplier of potable water and wastewater services.

Question #22 (Air): The Florida Department of Protection (formerly FDER) agrees to wait until traffic is found sufficient before determining if an air quality modeling analysis is needed. This need will be based upon the current "Guidelines for Evaluating the Air Quality Impacts of Indirect Sources". Please provide the Department with a complete traffic study as soon as sufficiency is met.

Thank you for this opportunity to provide comments on the Sufficiency Response. If you have any further questions regarding them, please do not hesitate to call me at (407) 433-2650 or SUNCOM 232-2650.

Sincerely,



Marion Y. Hedgepeth
Environmental Administrator
Water Management Program



Florida Department of
Environmental Protection

Thine

Lawton Chiles
Governor

February 28, 1994

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

Virginia B. Wetherell
Secretary

Mr. Michael Busha
Treasure Coast Regional Planning Council
3228 S.W. Martin Downs Blvd.
P.O. Box 1529
Palm City, Florida 33490

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MAR 1 1994
TREASURE COAST REGIONAL
PLANNING COUNCIL

RE: LTC Ranch DRI

Dear Michael:

This letter is in regard to your February 9, 1994 letter requesting final agency comments for your impact assessment report for the LTC Ranch DRI. The Department has the following comments. For the record, we would like to state that the original Application for Development Approval and subsequent Sufficiency Responses failed to address many issues including:

1. Question 10, General Project Description

The Department's concerns regarding utility planning were not addressed. There appears to be a large number of undeveloped homesites that have been approved within Port St. Lucie, St. Lucie West and The Reserve. The applicant did not indicate whether there would be adequate services such as water supply, wastewater treatment and wastewater disposal capacity, etc. available for both LTC Ranch and these communities. In addition, the applicant may not have adequately estimated the capital improvements needed to accommodate this project (See: Questions 17 and 18). With so much infill currently available in this area of St. Lucie County, the project appears to fall into the category of urban sprawl from the standpoint of utility planning.

2. Question 13, Wetlands

The applicant never presented any information regarding wetlands delineation by Department personnel. The applicant needs to obtain a wetlands jurisdictional from the Department to determine the rightful pathway for the planning and processing of the stormwater management application. The applicant is reminded that the Department's jurisdiction may extend in and through some ditches, canals and adjoining wetlands.

3. Question 14, Water Quality

No data has been received on existing surface water, groundwater and sediment conditions. The applicant indicated in the original

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ADA that an existing SFWMD Water Use Permit No. 56-00118-W included a condition for monitoring of water quality as required. A copy of this permit was submitted for review; however, no water quality data was given for agency review. This water use permit expired on October 15, 1992. Furthermore, the applicant indicated that post development runoff would be of better quality than existing runoff. Again, no data was given to support such a statement. The Department did receive a letter (dated December 8, 1992) from the applicant's agent, Paula Hollihan, that included a list of chemicals being stored in a storage shed on site and the notation of a 2,000 gallon portable fuel tank on the property. Upon the review of this information, the Department issued a memorandum (dated December 22, 1992) to Paula Hollihan regarding recommended surface, groundwater and sediment testing needed to review the DRI. The proposed sampling plan included three groundwater samples, three surface water samples, and one sediment sample for a 2,455 acre site. In a letter (dated January 14, 1994) to the Department from Jay Apitz, an agent of the applicant, the applicant requested clarification on several aspects of the sampling analysis including a proposal to modify the proposed EPA testing procedures and clarify parameters to be tested under current drinking water standards. The Department responded with its approval to this request in a memorandum from Cher Petro dated January 27, 1994. These changes were acknowledged in a letter from Michael Busha (TCRPC) dated February 8, 1994. As of this date, no results have been received from the modified sampling plan.

4. Question 17, Potable Water

The Department still has concerns regarding St. Lucie County Utility Department's ability to supply water for the project. Past shortages during peak season usage indicated that wellfield capacity in this area may be a very serious concern. In addition, it was not clear how the demands of LTC Ranch would impact existing users. Adequate water supply may require the construction of a reverse osmosis system. These systems can be very expensive to construct, and brine disposal may become an additional problem. The applicant has not indicated financial support of this magnitude to St. Lucie County Utility Department.

5. Question 18, Wastewater

The Department still has concerns regarding St. Lucie County Utility Department's ability to provide wastewater effluent disposal for the proposed development. Preferred disposal

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methods such as deep wells or reuse systems can be very expensive. The applicant has not indicated financial support for these capital improvements.

6. Question 19, Stormwater

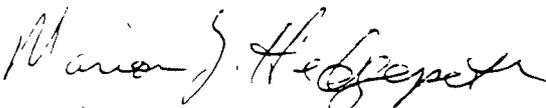
The applicant did not address the issue of how future site discharges will affect the amount of water discharged from the C-24 Canal to the Indian River Lagoon.

7. Questions 21 and 22, Transportation and Air

A letter dated February 21, 1994 from David Mulholland, agent for the applicant, was received by the Department. The letter stated that the intersection of West Midway Road/I-95 West would be deficient in Phase II with existing lane configurations. To ensure that the intersection would not fall below LOS Standard "D", the applicant indicated that a traffic analysis would be completed one year prior to the beginning of Phase II development. There was no indication from the letter that this information had been supplied to the Regional Planning Council. Therefore, the Department regards these questions as still incomplete.

Thank you for this opportunity to provide comments. If there are any questions regarding these issues, please do not hesitate to call me at (407) 433-2650 or SUNCOM 232-2650.

Sincerely,



Marion Y. Hedgepeth
Environmental Administrator

cc: John Outland, DEP Tallahassee, Intergovernmental Programs

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