



Florida Department of Environmental Protection

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Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

June 11, 2010

Mr. D. Ray Eubanks
Bureau of Local Planning
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

**Re: Martin County 10-1 Comprehensive Plan Amendment
Objections, Comments and Recommendations Report**

Dear Mr. Eubanks:

The Office of Intergovernmental Programs of the Florida Department of Environmental Protection (DEP or Department) has reviewed the above-referenced amendment submitted by Martin County (County) under the provisions of Chapter 163, Part II, *Florida Statutes* (F.S.), and Chapters 9J-5 and 9J-11, *Florida Administrative Code* (F.A.C.). Our comments address the potential impacts of the proposed land use designation and policy changes on resources or facilities within the purview of the Department's regulatory and proprietary responsibilities. The Department submits the following comments and recommendations to assist your agency in developing the state's response to the proposed amendments.

OVERVIEW

The County proposes to amend its comprehensive plan to allow eleven Future Land Use Map (FLUM) changes and four text changes. Our comments are related to proposed amendments **CPA 10-4** and **CPA 10-5**, both of which pertain to the Sunrise Groves development.

SUNRISE GROVES - CPA 10-4

The County proposes to change the Future Land Use designation of approximately 1,717 acres from *Agricultural* to *AgTEC*. The amendment is paired with **CPA-10-5**, which creates the new *AgTEC* land use category. The amendments would allow the development of an employment center on lands adjacent to and west of Interstate-95, limited to five million square feet of targeted employment uses; one million square feet

of office/regional headquarters/institutional uses; 200,000 square feet of ancillary retail development; and 500 hotel units. No residential units are associated with the proposed development.

COMMENTS – WATER AND WASTEWATER

The County did not provide adequate information regarding the availability of potable water supply sources and water/wastewater treatment facilities to serve the proposed land use changes. The amendment package included information indicating that central water and wastewater services could be provided by Martin County or through an inter-local agreement with the City of Port St. Lucie. Both local governments have adequate water and wastewater capacity to serve the development. Martin County has not yet made a decision to extend those services to the development. While an inter-local agreement with Port St. Lucie has been termed “imminent,” an agreement has not been executed.

The Department notes that the amendment would also allow the applicant to construct an interim package plant or temporary septic system to serve the property. Under the alternative provision, if the inter-local agreement is not finalized within one year, the applicant may construct a sub-regional facility to serve the proposed development. While it appears that several reasonable alternatives are available for the provision of water and wastewater facilities to the site, the amendment should include documentation *confirming* that adequate potable water supply and water and wastewater treatment facility capacity will, in fact, be available to serve the proposed land uses. The County should submit the required data and analysis and amend its Capital Improvements Element, if necessary, to demonstrate the manner in which the required services will be provided to the parcel subject to the proposed land use amendment.

The Department strongly encourages the County to require the developer to install reuse water lines simultaneously with the installation of water and wastewater lines that will serve the property. Reuse water from the wastewater treatment plant could be used to offset the amount of potable water normally used for residential, commercial and retail irrigation purposes. Reuse water can provide substantial potable water savings for the region and cost savings to the individual property owner.

NEW AG TECH LAND USE CATEGORY – CPA 10-5

This text amendment creates the new *AgTEC* future land use category, which allows the continuation of agricultural uses on the land, as well as a mixture of new uses that generate agriculture-related industrial and commercial employment. Policy 7 establishes a

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100-foot wide conservation area on the western portion of the property. Permitted uses in the conservation area include agriculture and passive alternative energy collection. While the Department supports sustainable agriculture and alternative energies, we do not believe those uses are appropriate in conservation areas. We therefore recommend that the County not allow those uses in the proposed conservation area.

We appreciate the opportunity to provide comments on the proposed amendments. Should you have any questions or require additional information, please do not hesitate to contact me at (850) 245-2169 or by email to Chris.Stahl@dep.state.fl.us.

Yours sincerely,



Chris Stahl, Environmental Specialist
Office of Intergovernmental Programs

CJS/