

May 19, 2010

Ray Eubanks, Community Program Administrator  
Plan Review and DRI Processing Team  
Department of Community Affairs  
2555 Shumard Oak Boulevard  
Tallahassee, FL 32399-2100

Dear Mr. Eubanks:

SUBJECT: Proposed Comprehensive Plan Amendments ORC Review  
Local Government: Martin County  
DCA Amendment #: 10-1

The Department has reviewed the proposed future land use map and text amendments to the future land use element of the comprehensive plan for Martin County. The focus of our review was on major transportation issues, particularly impacts to the Strategic Intermodal System (SIS) and other regionally significant transportation facilities, the connection between transportation and land use, and aiding in the reduction of vehicle miles traveled (VMT).

The objections and concerns identified in the attached objections, recommendations and comments report are associated with a lack of assessing the overall SIS and regional roadway network based on the combined development potential of the amendments, strategies to address impacts to SIS and regionally significant facilities not adequately specified, inconsistent analyses and infrastructure needs assessments not based on current proposals, and a lack of integration of transportation and land use issues.

Thank you for the opportunity to participate in the review process. If you have any comments or questions about this letter, please contact Andrew Riddle at (954) 777-4605.

Sincerely,

Gerry O'Reilly, P.E.  
Director of Transportation Development  
District Four

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cc: Bob Dennis, DCA  
Terry Hess, TCRPC  
Nicki van Vonno, Martin County  
Taryn Kryzda, Martin County

Kathleen Neill, FDOT Central Office  
Nancy Ziegler, FDOT District Four  
Lois Bush, FDOT District Four  
Karen Kiselewski, Renaissance Planning Group

## **DISTRICT 4, DEPARTMENT OF TRANSPORTATION OBJECTIONS, RECOMMENDATIONS & COMMENTS**

RESPONSIBLE DIVISION/BUREAU:	<u>Growth Management</u>
NAME OF LOCAL GOVERNMENT:	<u>Martin County</u>
DATE PLAN RECEIVED FROM LOCAL GOVERNMENT:	<u>04/22/10</u>
DATE MEMORANDUM RECEIVED FROM DCA:	<u>04/28/10</u>
REQUIRED RETURN DATE FOR COMMENTS:	<u>05/27/10</u>

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### **GENERAL BACKGROUND INFORMATION**

Martin County has submitted DCA amendment package 10-1. The package contains future land use map and text amendments to the future land use element of the comprehensive plan. The main focus of the Department's review was on the potential effects to the Martin County transportation networks and strategies to minimize traffic impacts and reduce vehicle miles traveled (VMT).

The Department has the following concerns regarding the Martin County 2010-1 amendment package.

- Many of the County's proposed amendments are located outside of the Primary and Secondary Urban Service Districts and fail to adequately address potential negative impacts on the infrastructure in these areas. Additionally, many of the submitted traffic analyses are not based on the proposed amendments as approved for transmittal to the Department of Community Affairs by the Martin County Board of County Commissioners, but rather are based on earlier proposed amendments that have since been modified.
- The County did not provide adequate needs analyses to demonstrate that the development potential of the proposed amendments is required to support population growth and employment projections, particularly given recent economic conditions. Furthermore, discussions are lacking about whether the proposed developments are in appropriate locations. The proposed amendments will lead to a significant increase in five-acre residential lots, increased commercial space and create a large industrial complex away from the existing Martin County urban areas.
- The County did not provide an overall assessment of impacts to the SIS facilities and regionally significant facilities based on the combined development potential of the proposed amendments. Additionally, no amendments are included to address changes needed to the transportation network to accommodate the increased development potential for the Transportation, Capital Improvements and Intergovernmental Coordination Elements of the County's comprehensive plan.

The following SIS facilities are located in Martin County:

- I-95
- Florida's Turnpike
- SR 710
- US 441

The following regionally significant roadway facilities are also located within the County:

- CR 609 (Allapatah Road)
- CR 714 (SW Martin Highway)
- SR 76 (Kanner Highway)
- CR 726 (Citrus Boulevard)
- CR 76A (SW Citrus Boulevard)
- CR 708 (Bridge Road)
- CR 711 (Pratt Whitney Road)
- Cove Road
- A1A
- US 1
- SW Murphy Road/High Meadows Avenue
- NE Jensen Beach Boulevard
- NE Causeway Boulevard

Due to Martin County's classification as a non-DULA (dense urban land area) county, statewide SIS level of service standards are still applicable.

- The Department of Transportation is currently working with other agencies to address long-term capacity needs for I-95. The proposed amendments do not adequately address how the County proposes to minimize impacts to I-95 or alternate routes for use instead of I-95. SIS improvements are being deferred due to declining revenue and fewer projects are being funded, including projects that have been identified as needed and cost-feasible until recently. Because of these conditions, SIS, State and county funding cannot be relied upon as a guarantee that future identified projects will be constructed. The amendment must demonstrate how levels of service can be maintained in the absence of funding for projects currently identified.

## **CPA 10-1**

This proposed amendment is located on 3,902 acres along Kanner Highway, south of SW Bridge Road. The existing future land use designation is Agriculture (one unit per 20 acres) and the proposed amendment would apply the Agricultural Ranchette designation (one unit per five acres), with a conservation easement on 2,452 acres.

Objection: The application states that the traffic analysis was based on the original proposal of 725 units. For adoption purposes, the County considered a maximum of 600 units, per a development agreement, but the proposed Agricultural Ranchette land use allows for a maximum

of 780 units (based on five units per acre). Throughout the application, analyses are based on these various figures. Without use of a text amendment limiting future development on the site to a specified limit, the maximum potential of 780 units should be considered for all analyses to determine if infrastructure and services can accommodate future potential development.

Objection: The proposed amendment will lead to urban sprawl, single-use automobile dependent development that will lead to an increase in VMT. The development will increase residential uses in a rural area outside of the primary and secondary urban service districts and be developed in a pattern that will lead to a reliance on the automobile for daily needs.

Concern: The request proposes to limit development to 1,448 acres and place a conservation easement on 2,452 acres. In response to staff's comments, the applicant stated they would commit to a perpetual easement, maintained by SFWMD as part of the CERP program. If this is the method for conservation used as opposed to a future land use amendment, a text amendment should be included to guarantee this process occurs and that the conservation easement is maintained in perpetuity.

#### **CPA 10-4 (FLUM Amendment)**

#### **CPA 10-5 (Text Amendment)**

This proposed amendment is located on 1,717 acres along SW Martin highway, west of I-95. The existing future land use designation is Agriculture (one unit per 20 acres) and the proposed amendment would apply the AgTEC designation to the site (5,000,000 square feet industrial; 1,000,000 square feet office; 500 hotel rooms; 200,000 square feet ancillary retail).

Objection: The analyses showing need and availability of infrastructure and services do not adequately demonstrate future availability of infrastructure and services to accommodate the potential impacts from a development of this magnitude. The traffic analysis identified potential future failing of SR 714 between the property entrance and the Florida Turnpike. In addition to the potential failure noted in the traffic study, the Martin County Traffic Engineering Department identified the following potential level of service deficiencies:

- SR 714 (Martin Highway) between CR 76A (SW Citrus Blvd) and the entrance to the Florida Turnpike (**short-term**)
- Segments of I-95, CR 609 (Allapattah Rd), SW Citrus Blvd, and SR 714 (Martin Highway) (**long-term**)

To address these deficiencies, the submitted traffic analysis relies on a future north-south connector road to Becker Highway in Port St. Lucie. The applicant does not identify funding for this roadway. This future roadway is not identified in Martin County or City of Port St. Lucie future transportation plans nor is it identified in cost-feasible long range transportation plans for either county. Potential negative effects on the roadways identified above should be addressed, with cost-feasible projects identified to adequately address future transportation impacts

generated from this proposed amendment. Necessary infrastructure should be identified in the County's transportation and capital improvement elements, with revenue sources specified.

This proposed amendment, combined with additional approved large-scale developments in the area, will have significant impacts on I-95, which is anticipated to not meet adopted level of service standards in the long-term planning horizon. The application discusses the development of a north-south connector road to Becker Road in Port St. Lucie, which has an interchange with I-95. Just north of the site in Port St. Lucie, four DRIs have been approved with the following development potential:

- Residential: 30,851 units
- Retail: 4,314,561 square feet
- Office: 2,597,238 square feet
- Industrial: 7,444,405 square feet
- Hotel: 850 room

The combined effect of this proposed amendment with the development potential just north of the site will significantly impact I-95 and the interchanges with Becker Road and CR 714. The County does identify or include mitigation projects/strategies to address future impacts of these large-scale projects. The interchange at I-95 and Becker Road was not designed to accommodate this intensity of development and the County should coordinate with the City of Port St. Lucie to demonstrate how level of service standards will be maintained.

Objection: The vacant industrial lands analysis only considered Martin County and did not review the approximately 10,000,000 acres of vacant industrial land just to the north of the site in the City of Port St. Lucie. Other analyses, including transportation, water and wastewater, depend upon coordination with the City of Port St. Lucie for infrastructure and service needs. The amendment must include intergovernmental coordination mechanisms to ensure adequate infrastructure and services are in place to accommodate development. Necessary coordination with the City of Port St. Lucie is not identified yet the City is cited as a potential provider for infrastructure and service needs.

Concern: The amendment site is far removed from the majority of the Martin County workforce. This would lead to a significant increase in VMT due to its distant proximity from residential areas and the lack of any significant residential areas in the vicinity of the amendment site.

Concern: The proposed amendment would allow for the following development mix:

- 5,000,000 square feet industrial
- 1,000,000 square feet office
- 500 hotel rooms
- 200,000 square feet ancillary retail

The amendment does not include any specific policy text regarding the placement of uses, the internal mix and how the uses will be distributed to minimize automobile trips internal to the site. Urban design policies addressing internal pedestrian and bicycle networks, with external access, and adequately mixing uses to minimize VMT and allow some trips to be made via walking or bicycling should be considered.

#### **CPA 10-6**

This proposed amendment is located on six parcels totaling 2.73 acres in Indiantown. The existing future land designation use is General Commercial and the proposed amendment would apply the Commercial/Office/Residential designation.

Comment: Based on the trip generation information provided in the amendment package, it cannot be concluded that the proposed future land use amendment will generate fewer trips than existing conditions. The Department suggests that further clarifications regarding trip generation based on the proposed future land use amendment be included and analyzed.

#### **CPA 10-7**

This proposed amendment is located on 63.6 acres in western Indiantown. The proposed amendment is to remove the mixed-use overlay but maintain the underlying Industrial land use designation.

Comment: The Department does not have a comment, concern or objection regarding the request to remove the Mixed Use Overlay while maintaining the Industrial future land use. The Department would recommend the City include policy language incorporating site design standards that promotes pedestrian access and evaluates the pedestrian and bicycle networks to allow for non-automobile commuting to the site for area workers.

Comment: Based on the trip generation information provided in the amendment package, it cannot be concluded that the proposed future land use amendment will generate fewer trips than existing conditions. The Department suggests that further clarifications regarding trip generation based on the proposed future land use amendment be included and analyzed.

#### **CPA 10-8**

This proposed amendment is located on 114.6 acres in southern Indiantown. The proposed amendment is to add the mixed-use overlay but maintain the underlying Low Density Residential land use designation.

Concern: Based on a review of trip generation figures, short-term level of service deficiencies are anticipated on SW Farm Road, SW Adams Avenue, and most of SR 710, a SIS facility. The FDOT adopted Five Year Work Program addresses impacts on SR 710 but not the other facilities. The traffic analysis provided was based on extending the mixed-use overlay to 263.3 acres, not the updated proposal of 114.6 acres. While reduced acreage will reduce the potential

trip generation, the analysis provided to determine if infrastructure is available to accommodate the proposed amendment must be based on the current proposed amendment.

Long-term negative impacts are also anticipated on SR 710 and CR 609 (SW Allapattah Road). These impacts are based on the traffic analysis and staff review of the amendment based on extending the mixed-use overlay to 263.3 acres, not the modified 114.6 acres. A traffic analysis must be included that analyzes potential impacts based on the current proposal of 114.6 acres.

Due to the withdrawal of several DRI applications, efforts have been suspended on the development of a SR 710 Level of Service Variance through Indiantown. As such, the County should demonstrate how level of service can be maintained.

### **CPA 10-9**

This proposed amendment is located on 3,081 acres south of SE Bridge Road and east of I-95/Florida's Turnpike. The existing future land use designation is agricultural and the proposed amendment would apply the Agricultural Ranchette designation on 2,407 acres and Public Conservation on 674 acres.

Objection: The 3,081 acres, currently designated as Agricultural, is proposed to be amended to include 2,407 acres of Agricultural Ranchette and 674 of Public Conservation. The application states a maximum of 270 five, ten and twenty acre lots will be developed within the 2,407 acres. However, based on the maximum allowable density for the land use designation, there is a potential for 481 dwelling units. In addition, the traffic analysis was based on applying the agricultural ranchette future land use on 2,581 acres. All analyses should be based on the maximum development potential of the future land use designation.

Concern: The 2030 LRTP identifies the following roadway improvements, that the traffic study uses in its roadway analysis: CR 711 widening to four lanes, CR 76A widening for four lanes, SW 96<sup>th</sup> Street widening to four lanes. In Martin County, and throughout the State, revenues have been declining and fewer projects are being funded, including projects that have been identified as needed and cost-feasible until recently. Because of these conditions, SIS, State and County funding cannot be relied upon as a guarantee that future identified projects will be constructed. The amendment must demonstrate how levels of service can be maintained in the absence of funding for projects currently identified.

Concern: The proposed amendment will lead to urban sprawl, single-use automobile dependent development that will lead to an increase in VMT. It is located outside of the primary and secondary urban service districts and will lead to a pattern of development that will lead to a reliance on the automobile for daily needs.

Comment: The Turnpike Enterprise has no jurisdiction to require developers to implement noise mitigation measures for newer communities, and highly recommends that Martin County's review of future site development incorporates noise buffering. Types of noise buffering

include: berms, walls, landscaping or setback requirements. The Turnpike Enterprise is not responsible for noise mitigation for existing facilities post site development.

#### **CPA 10-10**

This proposed amendment is located on 93.7 acres south of SE Cove Road. The existing future land use designation is Rural Density Residential and the proposed amendment would apply the Residential Estate designation.

Concern: Potential long-term future level of service deficiencies have been identified along SE Willoughby Blvd and SE Pomeroy Street. No improvements have been identified to address these future needs. This amendment, combined with a substantial number of amendments in this portion of the County in recent years, facilitates the need for an area assessment to appropriately plan for and accommodate development occurring in the area. Pedestrian and bicycle needs should be evaluated through this area with adequate connections to non-residential areas to minimize VMT and provide residents with transportation options.

#### **CPA 10-11**

This proposed amendment is located east NE Indian River Drive in northeastern Martin County. The existing future land use designation is Limited Commercial and the proposed amendment would apply the Waterfront Commercial designation on 11 parcels totaling 4.79 acres.

The Department does not have any comments, concerns or objections related to this amendment.

#### **CPA 10-12**

This proposed amendment is located on 15.68 acres north of SE Salerno Road. The existing future land use designation is Rural Density Residential and the proposed amendment would apply the General Institutional designation.

Concern: The traffic analysis shows that Salerno Road and Willoughby Boulevard are projected to be significantly impacted by traffic associated with the proposed future land use amendment. The analysis identifies that roadways will be operating acceptably through 2014, but does not identify roadway conditions in the long-term planning horizon (2030). The traffic analysis must be modified to include a long-term assessment of roadways and determine what capital improvements will be needed to accommodate the proposed land use amendment.

Comment: The proposed land use amendment to the General Institutional future land use designation identifies a proposed development of a 1,000 seat church and 500 student private school. It is recommended that this amendment as well as all amendments related to schools, churches and other attractions include policy language regarding the pedestrian network, including pedestrian and bicycle facilities to safely and efficiently allow people to access the site without the use of an automobile. Providing connections into surrounding neighborhoods and

adequate access to the site should be considered for a text amendment to the General Institutional future land use designation and at a minimum be incorporated during site plan development.

#### **CPA 10-16**

This proposed amendment is located on 2.1 acres just west of US 1 in northern Martin County. The existing future land use designation is Limited Commercial and Commercial/Office/Residential and the proposed amendment would apply the General Commercial designation.

Concern: The submitted traffic analysis is based upon a proposed buildout scenario, not the maximum potential development based on the proposed future land use map amendment. The traffic analysis must be based on the maximum development potential, not a site plan based maximum. US 1 in this area is currently operating under an interim LOS standard because of congestion along the facility. Green River Parkway is currently under construction and will alleviate impacts from US 1. The submitted traffic analysis should be modified to address the maximum development potential and assess impacts on US 1, Green River Parkway and other area facilities that will be impacted by this amendment and determine what capital improvements projects, if any, may be needed to accommodate the proposed land use amendment.

#### **CPA 10-17**

This project, Canopy Creek, has been under construction and the amendment relates to water and wastewater service.

The Department does not have any comments, concerns or objections related to this amendment.

#### **CPA 10-19 (FLUM Amendment)**

#### **CPA 10-20 (Text Amendment)**

This proposed amendment is located on 246 acres along Kanner Highway, west of I-95/Florida's Turnpike. The existing future land use designation is Agriculture and the proposed amendment would apply the Commercial Waterfront (75 acres) and Industrial (171 acres) designations.

Concern: Projected short-term roadway deficiencies include SR 76 between CR 711 and Locks Road and SR 76 between I-95 and Cove Road. The segment between I-95 and Cove Road is addressed in the County's Capital Improvement Element but no improvements are planned between CR 711 and Locks Road.

Projected long-term roadway deficiencies include segments of SR 76, CR 711, CR 708, SW Citrus Boulevard, and SR 714. This analysis is based on the original proposal to include the Industrial future land use designation on 342 acres. A traffic analysis based on the current proposal should be performed to identify potential deficiencies, and projects and strategies to address these deficiencies.

## **CPA 10-21**

This proposed amendment is located on five acres at the northwestern corner of SW Martin Highway and SW Allapattah Road (CR 609). The amendment is to designate the site as a rural services node but maintain the underlying Agriculture future land use.

Concern: The CR 609 Planning and Conceptual Engineering (PACE) stemmed from identification of a Western Parkway Preferred Scenario in the 2030 Regional Long Range Transportation Plan for the Martin Metropolitan Planning Organization (MPO) and the St. Lucie Transportation Planning Organization (TPO), which also included designation of the CR 609 corridor from Indiantown in Martin County to CR 510 in Indian River County as a regional multi-modal corridor. The traffic analysis included with the proposed amendment does not identify any short or long-term roadway deficiencies, but County analysis shows a potential failure along CR 609 between CR 714 and the St. Lucie County boundary. The County should identify projects or strategies to maintain service along this key corridor in western Martin County.

Concern: The proposed amendment could lead to a proliferation of similar land use changes in the rural portions of Martin County, particularly along Martin Highway. The County should institute policy language limiting commercial future land uses outside the primary and secondary urban service districts to the minimum needed to support rural residential areas. Policies should include placement of uses, proximity of other services and the maximum square footage allowable at each commercial area.

## **CPA 10-4**

## **CPA 10-19**

## **CPA 10-20**

Concern: The Department of Transportation is currently working with other agencies to address long-term capacity needs for I-95 and the Florida Turnpike. The proposed amendments do not adequately address how they propose to minimize impacts to I-95 or the Florida Turnpike or identify alternate routes for use instead of I-95. SIS improvements are being deferred due to declining revenue and fewer projects are being funded, including projects that have been identified as needed and cost-feasible until recently. Because of these conditions, SIS, State and county funding cannot be relied upon as a guarantee that future identified projects will be constructed. The amendment must demonstrate how levels of service can be maintained in the absence of funding for projects currently identified.

## **CPA 10-1**

## **CPA 10-4**

## **CPA 10-9**

Concern: Many of the County's proposed amendments are located outside of the Primary and Secondary Urban Service Districts and fail to adequately address potential negative impacts on

the infrastructure in these areas. The proposed amendments will increase average trip lengths, increase VMT, proliferate urban sprawl and promote an inefficient land use pattern.

**CPA 10-1**

**CPA 10-4**

**CPA 10-8**

**CPA 10-9**

**CPA 10-10**

**CPA 10-12**

**CPA 10-19**

**CPA 10-21**

Objection: These proposed amendments are not anticipated to cause level of service deficiencies on I-95 and SR 710, both of which are SIS facilities, through 2014. However, both of these facilities are expected to be operating at a deficient level of service prior to 2030. Mitigation plans should be developed to address these facilities prior to failing to operate at the adopted level of service.

Citations for Objections and Concerns:

§163.3177 (6), FS	§163.3180 (10), FS	§9J-5.005, FAC	§9J-5.0055, FAC
§9J-5.006, FAC	§9J-5.016, FAC	§9J-5.019, FAC	

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