

RESPONSES TO AGENCY COMMENTS

OVERVIEW

The following information is provided as clarification on the proposed AgTEC land use category in response to some of the Agency comments received thus far. The intent is to provide further clarification on the justification for the proposed land use category as well as specific locations in the text amendment where the applicant has provided specific language to address concerns raised in these comment letters.

TREASURE COAST RPC

- *The property is far removed from the Urban Service District Boundary in an isolated area far from existing urban development in Martin County.*

This statement ignores the adjacent development, adjacent infrastructure and regional perspective. The property is adjacent to urban development and the City of Port St. Lucie's Urban Services Boundary extends north along the entire northern boundary of the Sunrise Groves property. To the west is planned residential, commercial and industrial development, including up to 30,000 new residential units (as TCRPC staff shows in Table 2). In addition, to the east, adjacent to the property on the other side of I- 95 is the Stuart West community.

- *The amendment does not contribute to a balance of uses, as there is no adjacent residential development or functional mix of uses in the area.*

In creating this amendment, the applicant evaluated the existing uses in Martin County and the surrounding area. We found that there is a need for industrial and job centered uses to diversify the local Martin County economy, but given the tens of thousands of permitted units adjacent to the property, the need for additional residential units does not exist. In addition, in being sensitive to the character of Martin County and the county's desire to limit the amount of residential in its western lands, our Comp Plan Amendment specifically does not include residential uses. A "mix of uses" is not always the ideal scenario, as blending industrial uses with residential is not always feasible or desirable. In this case, however, there is a more than adequate supply of residential units in very close proximity, but buffered such that compatibility will not preclude the construction of industrial and commercial development.

This proposal does provide a full mix of uses, including industrial, office, retail and hotel uses. The only use that is not included is residential, which is due to the tens of thousands of permitted units in very close proximity.

- *There are no public utilities in the area. The nearest Martin County facilities are 3.75 miles to the east. The City of Port St. Lucie has recently indicated that it would not provide sewer and water services to this development.*

Not true. There are public facilities immediately adjacent to the property in Port St. Lucie including a water and sewer line that extends to the Southern Groves DRI directly to the north of our property.

Of significance is that while the City of Port St. Lucie originally voted not to discuss the provision of water and sewer, they have revisited this request and have since directed their staff to enter into further discussions regarding provision of water and sewer service to our property. These discussions are on-going.

- *There would be a significant increase in providing and maintaining police, fire, emergency response and other facilities.*

The fiscal impact analysis conducted by nationally renowned economist Dr. James Nicholas shows an annual operating surplus of over \$1.8 million. That is the net positive revenue after providing all public services every year. We have not seen any staff report showing data and analysis to validate any statements to the contrary.

- *Staff also states the following: "Proposed development would compete directly with lands approved for development in the nearby Port St. Lucie Western Annexation Area. It would compete with these DRI's and also for the Port St. Lucie labor market."*

The idea that adjacent similarly entitled properties are competition for attracting uses (to the degree that competition is seen as negative) ignores the basics of real estate economics and the day-to-day realities of economic development. It is commonly understood that a critical mass of land area, entitlements and diversity of property owners marketing a corridor increases the likelihood of success. Adjacent properties marketing employment centers have more of a positive nexus than a negative from competition. This comment also ignores the years of work invested in the creation of the Final Report of the Committee for a

Sustainable Treasure Coast (CSTC) which was developed through a consensus based approach from representatives throughout Martin, St. Lucie and Indian River Counties.

The Treasure Coast Region needs to be marketed as a region, not viewed where Martin County's industrial lands are in competition for St. Lucie County's industrial lands. The reality is that uses and tenants compare regions. New enterprises will be comparing Central Florida to Southeast Florida to the Treasure Coast, etc. The more resources that are put forth in marketing the region, the more economic development activities will find their way to the Treasure Coast. Martin County deserves its "piece of the pie" in terms of economic diversification. Our property has a strong synergy with the excellent work already accomplished by St. Lucie County and Port St. Lucie to put the Treasure Coast on the map in terms of attracting targeted employment to the region.

The more that we can build a concentrated corridor for economic development activities and jointly market those activities, the greater success the Treasure Coast region will achieve. This should be obvious to TCRPC staff and its governing board.

Finally, the comment that this amendment will be "competing for the St. Lucie labor market" can only be seen as a positive for a county that has one of the highest unemployment rates in the State of Florida. Should this project be successful, it would provide jobs to the many unemployed workers from both Martin and St. Lucie Counties.

FLORIDA DEPARTMENT OF TRANSPORTATION

- *3rd bullet point at the beginning "Additionally, no amendments are included to address changes needed to the transportation network to accommodate the increased development potential for the Transportation..."*

Policy 6B.5 of the AgTEC text amendment requires dedication of right of way for a future extension of the road that runs parallel to I-95 to act as a reliever of local trips from the I-95 corridor. The intent of the I-95 corridor is to act as a regional transportation route and one which carries regional commercial trips. This improvement to the road network, which is not being acknowledged in this letter, provides a facility to relieve I-95 of local trips. The fourth bullet on Page 2 states "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." Again, FDOT did not acknowledge the requirement of the AgTEC amendment to expand

upon the existing roadway network by providing a road parallel to I-95 to relieve this regional road from local traffic.

In addition to Policy 6B.5., Policies 6E.9. and 6F.6. require, at minimum, financial support and the provision of water management areas for the widening of SR 714 as well as the evaluation of other transportation network improvements. Policy 6B.2 requires that prior to the submittal of any development proposal for the property, a conceptual plan must be approved by the Board of County Commissioners which includes, "... general site layout, with a conceptual roadway/sidewalk/transit network..."

- *On Page 4, FDOT states that "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." The Regional Planning Council had a similar comment.*

This comment ignores two factors. First, studies have shown that upwards of 35% of the Martin County workforce leaves Martin County for work each day. This amendment has the potential of improving the existing situation by capturing some of those trips. Second, the comment does not consider the tens of thousands of units that are directly contiguous to the property in Port St. Lucie and Stuart West. FDOT seems to be analyzing this amendment as did the RPC, simply based on proximity to coastal residential in Martin County exclusively, without acknowledging the regional perspective.

The property is located directly adjacent to Stuart West, a residential development, less than a 10 minute drive from the entire Palm City population and less than a 20 minute drive from the majority of the population center of Martin County.

There is no disputing that a portion of the workforce will come from St. Lucie County but to say the site is far removed from Martin County's workforce and Martin County citizens would not desire to work within their own county is illogical.

Currently an estimated 35% of the Martin County workforce leaves Martin County every day to go to work in St. Lucie and Palm Beach counties. This site will draw from some of that workforce that currently goes to St. Lucie or Palm Beach for employment. Like any employment center, workers will come from various places.

In addition, please see Policy 6E.2. that was added to specifically address VMT reduction:

“e. Minimize greenhouse gas emissions and vehicle miles traveled (VMT) by locating employment intensive uses, such as regional headquarter offices or labor intensive industrial uses in such a manner as to locate them close to mass transit/alternative transit modes, or in close proximity to existing and planned residential areas; and provide a mix of uses to promote internal capture of trips during the work day in accordance with Chapter 163.3177 (6) (a). Provide transportation demand management strategies to support a reduction in VMT.”

- *On Page 5, FDOT states, “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.”*

This is incorrect based on the proposed text amendment. Policy 6A.3. specifically requires a mix of uses and a distribution of those uses so that internal capture will be achieved. Retail and hotel uses are included for this reason and required to be adequately distributed throughout the property to create a situation of on-site internal capture of trips. Residential units have not been included because there is no need for additional residential development with 30,000 new residential units approved to the north and northwest in the 3 approved DRIs, as well as tens of thousands of platted lots in Port St. Lucie immediately to the northeast of the property; and a couple thousand additional units in Martin County directly adjacent in Martin County.

With respect to retail and support services, those uses are allowed to be, and are required to be, located on site. The text amendment Policy 6A.3 requires a phasing so that those support uses are constructed concurrent with employment uses and the project achieves internal capture by providing services to workers. The following language in 6A.3. was included to achieve this goal of retail support service:

“...Only retail uses that are intended to service the permitted uses in the nearby agricultural land use designation or the Targeted Employment /commerce activities and are ancillary to the principal uses shall be allowed. Further, to promote distribution of the retail uses throughout the site, no more than 20% of the square footage contained in any non agricultural Final Site Plan Approval shall be allocated to ancillary retail. Similarly, in order to ensure a mix of uses and provide for internal capture, a minimum of 25,000 square feet of ancillary uses shall be required for each 1,000,000 square feet of primary uses.”

With regard to the provision of transit, Policy 6E.2, above requires that intensive uses be located adjacent to transit nodes; and Policy 6B.5 requires that right of way is provided for transit along the north-south corridor. Transit service is envisioned for this project, as demonstrated by the proposed policies which specifically address mass transit, alternative transportation, and connectivity with adjacent transit activities.

FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION

In the RPC report, there was not recognition of the environmental restoration benefits provided by this proposal. The FFWCC recognized these benefits in the comment provided at the bottom of Page 3. The environmental restoration requirements are consistent and implement the Natural Resource goals of the Strategic Regional Policy Plan and were the reason why the Regional Planning Council deemed this project to be consistent with the SRPP, specifically many of the Policies under SRPP Goal 6.1, including Policies 6.1.1.2- 6.1.1.4 & Strategy 6.1.2.