CPA 23-10, Martin Commerce FLUM Amendment State Agency Review

FLORIDAC®MMERCE

October 3, 2024

The Honorable Edward V. Ciampi Chairman, Martin County Board of County Commissioners 2401 S.E. Monterey Road Stuart, Florida 34996

Dear Chairman Ciampi:

FloridaCommerce has reviewed Martin County proposed comprehensive plan amendment (Amendment No. 24-03ESR), received on September 25, 2024, pursuant to the expedited state review process in Section 163.3184(2) and (3), Florida Statutes (F.S.). We have identified no comment related to adverse impacts to important state resources and facilities within FloridaCommerce's authorized scope of review.

We are, however, providing two (2) technical assistance comments consistent with Section 163.3168(3), F.S. The technical assistance comments will not form the basis of a challenge. They are offered either as suggestions which can strengthen the County's comprehensive plan in order to foster a vibrant, healthy community or are technical in nature and designed to ensure consistency with the Community Planning Act in Chapter 163, Part II, F.S. The technical assistance comments are:

Technical Assistance Comment [1]: <u>Concurrent Adoption of Amendment 24-02ESR and</u> <u>Amendment 24-03ESR.</u>

Proposed Amendments 24-02ESR and 24-03ESR are both related to the proposed Martin Commerce Park development and are being reviewed concurrently by FloridaCommerce staff. As implementation of these amendments is contingent on both amendments being approved and adopted by the Martin County Board of County Commissioners (BOCC), FloridaCommerce staff recommends that the adoption of both amendments be considered by the BOCC during the same public hearing to ensure internal consistency within the Comprehensive Plan.

Technical Assistance Comment [2]: Availability of Public Facilities.

While the subject property has access to the Martin County Utilities water and sewer lines that are being extended to the adjacent Martingale Commons property by way of the Western Corridor Water and Sewer Main Extension Project, the Martin County Utilities Department has not confirmed the availability of (or capacity for) water and sewer services to serve the subject site (Martin Commerce Park). A companion text amendment, currently also under review by FloridaCommerce staff, proposes to extend water and sewer service to the subject site through the creation of a Freestanding Urban Service District and requires that future development pay the full cost of capital facilities needed to address the impacts of such development. FloridaCommerce staff recommends that all planned public facility improvements be reflected within the Capital Improvements Element of the Martin County Comprehensive Plan.

Caldwell Building | 107 E. Madison Street Tallahassee, FL 32399 850.245.7105 | www.FloridaJobs.org | Twitter: @FLACommerce An equal opportunity employer/program. Auxiliary aids and service are avai upon request to individuals with disabilities. All voice telephone numbers o document may be reached by persons using TTY/TTD equipment via the Fk Relay Service at 711. The County should act by choosing to adopt, adopt with changes, or not adopt the proposed amendment. For your assistance, we have enclosed the procedures for adoption and transmittal of the comprehensive plan amendment. In addition, the County is reminded that:

- Section 163.3184(3)(b), F.S., authorizes other reviewing agencies to provide comments directly to the County. If the County receives reviewing agency comments and they are not resolved, these comments could form the basis for a challenge to the amendment after adoption.
- The second public hearing, which shall be a hearing on whether to adopt one or more comprehensive plan amendments, must be held within 180 days of your receipt of agency comments or the amendment shall be deemed withdrawn unless extended by agreement with notice to FloridaCommerce and any affected party that provided comment on the amendment pursuant to Section 163.3184(3)(c)1., F.S.
- The adopted amendment must be transmitted to FloridaCommerce within ten working days after the second public hearing pursuant to 163.3184(3)(c)2., F.S. Under Section 163.3184(3)(c)2. and 4., F.S., the amendment effective date is 31 days after FloridaCommerce notifies the County that the amendment package is complete or, if challenged, until it is found to be in compliance by FloridaCommerce or the Administration Commission.

If you have any questions concerning this review, please contact Jana Williams, Regional Planning Administrator, by telephone at (850)-717-8483 or by email at jana.williams@commerce.fl.gov.

James D. Stansbury, Chief Bureau of Community Planning and Growth

JDS/jw

Enclosure(s): Procedures for Adoption

cc: Paul Schilling, Growth Management Department Director, Martin County Thomas Lanahan, Executive Director, Treasure Coast Regional Planning Council

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SUBMITTAL OF ADOPTED COMPREHENSIVE PLAN AMENDMENTS

FOR EXPEDITED STATE REVIEW

Section 163.3184(3), Florida Statutes

NUMBER OF COPIES TO BE SUBMITTED: Please submit electronically using FloridaCommerce's electronic amendment submittal portal "**Comprehensive Plan and Amendment Upload**" (*https://fldeo.my.salesforce-sites.com/cp/*) **or** submit three complete copies of all comprehensive plan materials, of which one complete paper copy and two complete electronic copies on CD ROM in Portable Document Format (PDF) to the State Land Planning Agency and one copy to each entity below that provided timely comments to the local government: the appropriate Regional Planning Council; Water Management District; Department of Transportation; Department of Environmental Protection; Department of State; the appropriate county (municipal amendments only); the Florida Fish and Wildlife Conservation Commission and the Department of Agriculture and Consumer Services (county plan amendments only); and the Department of Education (amendments relating to public schools); and for certain local governments, the appropriate military installation and any other local government or governmental agency that has filed a written request.

SUBMITTAL LETTER: Please include the following information in the cover letter transmitting the adopted amendment:

_____ State Land Planning Agency identification number for adopted amendment package;

_____ Summary description of the adoption package, including any amendments proposed but not adopted;

_____ Identify if concurrency has been rescinded and indicate for which public facilities. (Transportation, schools, recreation and open space).

_____ Ordinance number and adoption date;

_____ Certification that the adopted amendment(s) has been submitted to all parties that provided timely comments to the local government;

_____ Name, title, address, telephone, FAX number and e-mail address of local government contact;

_____ Letter signed by the chief elected official or the person designated by the local government.

ADOPTION AMENDMENT PACKAGE: Please include the following information in the amendment package:

_____ In the case of text amendments, changes should be shown in strike-through/underline format.

_____ In the case of future land use map amendments, an adopted future land use map, **in color format**, clearly depicting the parcel, its future land use designation, and its adopted designation.

_____ A copy of any data and analyses the local government deems appropriate.

Note: If the local government is relying on previously submitted data and analysis, no additional data and analysis is required;

_____ Copy of the executed ordinance adopting the comprehensive plan amendment(s);

Suggested effective date language for the adoption ordinance for expedited review:

"The effective date of this plan amendment, if the amendment is not timely challenged, shall be 31 days after the state land planning agency notifies the local government that the plan amendment package is complete. If the amendment is timely challenged, this amendment shall become effective on the date the state land planning agency or the Administration Commission enters a final order determining this adopted amendment to be in compliance."

_____ List of additional changes made in the adopted amendment that the State Land Planning Agency did not previously review;

List of findings of the local governing body, if any, that were not included in the ordinance and which provided the basis of the adoption or determination not to adopt the proposed amendment;

_____ Statement indicating the relationship of the additional changes not previously reviewed by the State Land Planning Agency in response to the comment letter from the State Land Planning Agency.

From:Paul SchillingTo:Clyde Dulin; Joan Seaman; Samantha Lovelady; Maria HarrisonSubject:FW: Martin County 24-03ESR ProposedDate:Friday, October 18, 2024 2:39:38 PMAttachments:image001.png

Paul Schilling Director Growth Management Department Martin County Board of County Commissioners 772-288-5473

From: Plan_Review <Plan.Review@dep.state.fl.us>
Sent: Friday, October 18, 2024 2:36 PM
To: Paul Schilling <pschilli@martin.fl.us>; DCPexter@commerce.fl.gov
Cc: Plan_Review <Plan.Review@dep.state.fl.us>
Subject: Martin County 24-03ESR Proposed

To: Paul Schilling, Growth Management Department Director

Re: Martin County 24-03ESR – Expedited State Review of Proposed Comprehensive Plan Amendment

The Office of Intergovernmental Programs of the Florida Department of Environmental Protection (Department) has reviewed the above-referenced amendment package under the provisions of Chapter 163, Florida Statutes (F.S.). The Department conducted a detailed review that focused on potential adverse impacts to important state resources and facilities, specifically: air and water pollution; wetlands and other surface waters of the state; federal and state-owned lands and interest in lands, including state parks, greenways and trails, conservation easements; solid waste; and water and wastewater treatment.

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Based on our review of the submitted amendment package, the Department offers the following technical assistance:

The St. Lucie River and Estuary (STLU) Basin Management Action Plan (BMAP) outlined by 403.067(7), F.S., and adopted by secretarial order, and the Lake Okeechobee (OKEE) BMAP outlined by 403.067(7), F.S., and adopted by secretarial order, identify and frame actions to address and restore impaired state waters. The Clean Waterways Act (Chapter 2020-150, Laws of Florida) further refines actions taken by the BMAPs. The location of the proposed project is within the C-44 basin of the STLU and OKEE BMAPs, which is currently designated as a high priority area for restoration plans. Activities associated with these land use changes have the potential to impact water quality. Appropriate measures should be taken to minimize any potential additional nutrient loadings to the St. Lucie River and the Lake Okeechobee watersheds. These measures include the proper treatment and disposal of wastewater in accordance with BMAP requirements, implementation of current and future onsite sewage and disposal system (OSTDS) prohibitions, stormwater controls, and the implementation of adequate sediment and erosion control practices to mitigate any groundwater or surface water impacts. Any additional nitrogen and phosphorus

loading to the basin will be evaluated and may require additional restoration actions by the County.

The Department is providing technical assistance comments consistent with Section 163.3168(3), F.S. The comments will not form the basis of a challenge. Please submit all future amendments by email to <u>Plan.Review@FloridaDEP.gov</u>. If your submittal is too large to send via email or if you need other assistance, contact Lindsay Weaver at (850) 717-9037.

Linlyben

Dep Customer Survey	
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TREASURE COAST REGIONAL PLANNING COUNCIL

MEMORANDUM

To: C	Council N	Members
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AGENDA ITEM 4B7

From: Staff

Date: October 11, 2024

Subject: Local Government Comprehensive Plan Review Draft Amendment to the Martin County Comprehensive Plan Amendment No. 24-03ESR

Introduction

The Community Planning Act, Chapter 163, *Florida Statutes*, authorizes the regional planning council to review local government comprehensive plan amendments prior to their adoption. The regional planning council review and comments are limited to adverse effects on regional resources or facilities identified in the Strategic Regional Policy Plan (SRPP) and extrajurisdictional impacts that would be inconsistent with the comprehensive plan of any affected local government within the region. Council must provide any comments to the local government within 30 days of the receipt of the proposed amendments and must also send a copy of any comments to the state land planning agency.

The amendment package from Martin County was received on September 25, 2024 and contains one amendment to the Future Land Use Map (FLUM) of the County's Comprehensive Growth Management Plan (CGMP). This report includes a summary of the proposed amendment and Council comments.

Summary of Proposed Amendment

The proposed amendment revises the future land use designation on ± 167 acres from Agricultural and Agricultural Ranchette to Industrial. The subject property is located between Interstate 95 and SW 84th Avenue, on the south side of SW Martin Highway, adjacent to the Martingale Commons Planned Unit Development and Interstate 95. The site is located at an I-95 interchange and the major roadway closest to the subject property is SW Martin Highway, which is classified as a major east-west arterial road and provides access to the property.

The County staff report notes that the subject 167 acres previously received site plan and plat approval as a subdivision consisting of Agricultural and Agricultural Ranchette lots called Martingale Estates. Adjacent land use designations include Agricultural to the south and west; Agricultural Ranchette and Rural Density to the north; and Agricultural Ranchette to the east. It is noted that concurrent with this FLUM amendment are proposed text amendments for this property to authorize extension of water and sewer services to the property, create a Freestanding Urban Service District, and place restrictions on development.

According to the County staff report, Industrial future land use designation is intended for the Primary Urban Service District and this site is approximately 4 miles from the Primary Urban Service District, and water and sewer service is not currently available to the subject site. However, the CGMP does allow Freestanding Urban Service Districts which feature only industrial development.

The County staff report states that the proposed FLUM amendment provides an opportunity to meet the nonresidential needs for residents in the area. While a 2023 Commercial and Industrial Land Analysis concludes that the County has a sufficient inventory of commercial and industrial land within the unincorporated areas for the present and near future, the study also notes projection methods appear much less useful than they have been in the past. Changes in the marketplace like e-commerce could greatly reduce the need for both developed and undeveloped commercial land while increasing the demand for logistics centers on industrial land.

An analysis of public services concludes that the proposed FLUM Amendment does not exceed level of service criteria for solid waste facilities nor will it diminish level of service for fire/public safety/EMS services. Since the Industrial designation will not place demands on parks, recreation, or educational facilities, the proposed amendment will not reduce level of service capacity for those services. With respect to traffic, the county's Traffic Engineering Administrator indicates that staff cannot provide a "positive evaluation," meaning there is not sufficient roadway capacity planned in the adopted long-range capital facility plans of the CGMP, and recommended that language be added to Policy 14.1C.5.(2)(e) requiring capacity improvements to SW Martin Highway between SW Allapattah Road and SW Martin Downs Boulevard in order to mitigate the impacts of development. Correspondence from the County's Utilities Department states that there needs to be an evaluation of plant and infrastructure capacity that will be required to serve this project. In addition to customary capital facility charges, the developer may be required to offset impacts through providing well sites, wells, transmission mains, and/or treatment plant components.

Regional Impacts

No adverse effects on regional resources or facilities have been identified.

Extrajurisdictional Impacts

Council requested comments from local governments and organizations expressing an interest in reviewing the proposed amendment on September 30, 2024. No extrajurisdictional impacts have been identified.

Conclusion

No adverse effects on regional resources or facilities and no extrajurisdictional impacts have been identified. The County is encouraged to take measures to ensure that adequate roadway capacity is available to serve development associated with this future land use map amendment concurrent with construction on the property, including consideration and analysis of changes that this amendment may encourage in the other quadrants of the intersection.

Recommendation

Council should approve this report and authorize its transmittal to Martin County and FloridaCommerce.

Council Action - October 18, 2024

Councilmember Davis, Gubernatorial Appointee from Palm Beach County, moved approval of the staff report. Vice Mayor Langowski from the City of Westlake seconded the motion, which carried unanimously.

Attachments

List of Exhibits

Exhibit

- 1 General Location Map
- 2 Aerial Location Map
- Existing Future Land Use Map Proposed Future Land Use Map 3 4
- 5 Public Comments

Exhibit 1 General Location Map

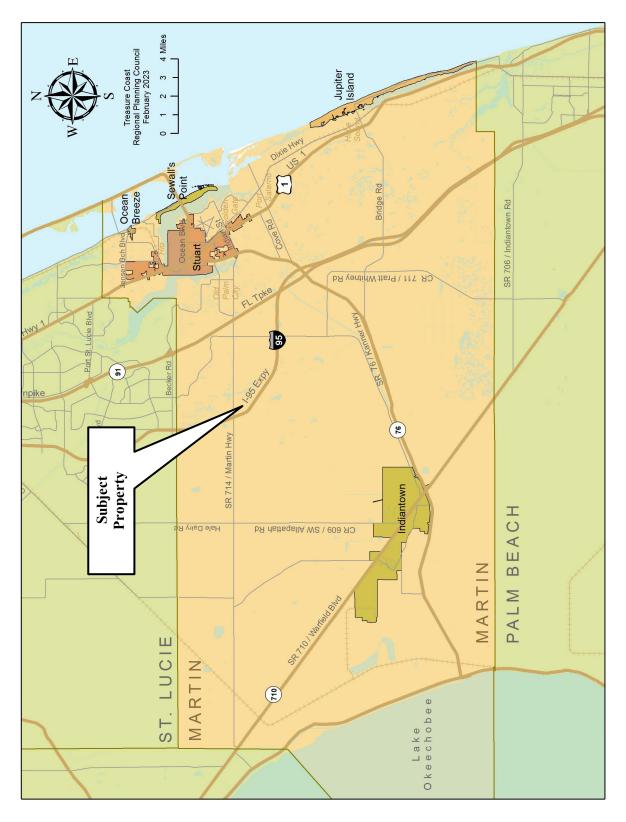


Exhibit 2 Aerial Location Map



Exhibit 3 Existing Future Land Use Map

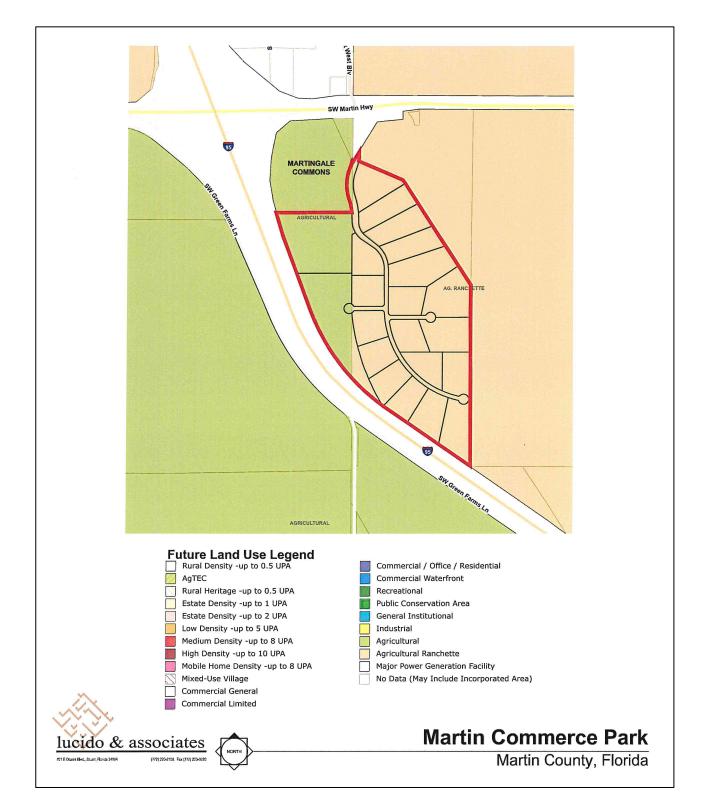


Exhibit 4 Proposed Future Land Use Map

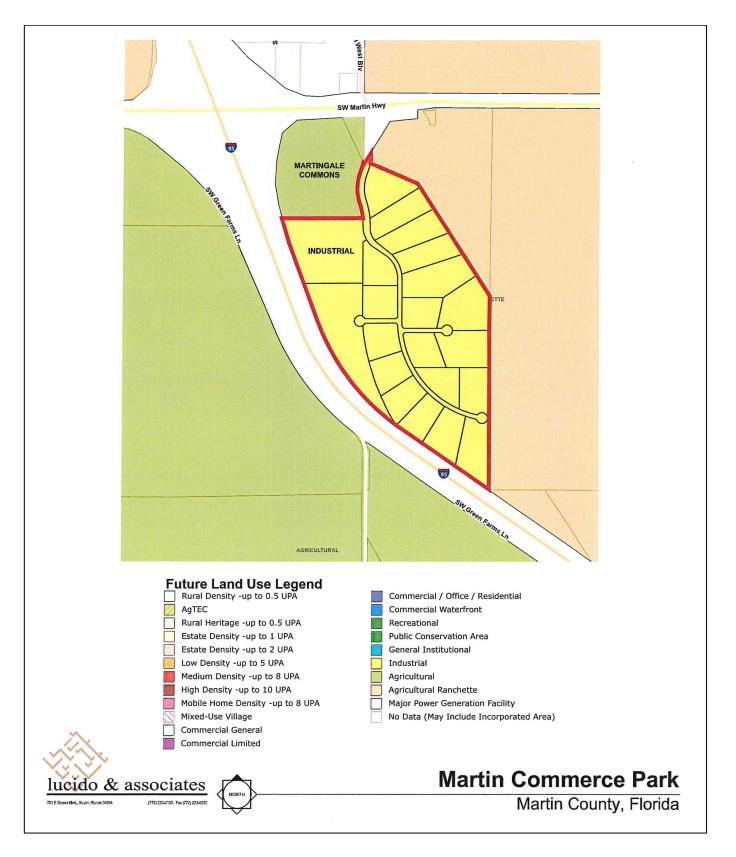


Exhibit 5 Public Comments

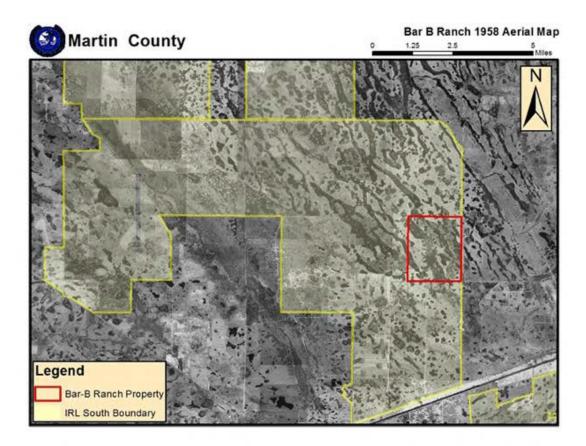
From:	NICK DANDOLA <dandola1@comcast.net></dandola1@comcast.net>
Sent:	Sunday, October 13, 2024 11:52 PM
То:	Plan.Review@dep.state.fl.us; d4-planningreviews@dot.state.fl.us; CompPlans@fdacs.gov; ComprehensivePlans@Commerce.fl.gov; CompliancePermits@DOS.MyFlorida.com; FWCConservationPlanningServices@myfwc.com; CompPlans@fldoe.org; Stephanie Heidt
Subject:	Martin County CPAs 23-09 and 23-10 - your review for sprawl and impacts on natural resources and traffic, etc.
Categories:	CPA
Governor's and the S	Martin County and I can tell you residents in Martin County appreciate the State Agencies' actions during Hurricane Milton and the related tornadoes and want tion and concerns for the safety of the personnel. In case the deadlines on review of n Amendments sent by Martin County are not extended due to the hurricane and

CPAs 23-09 and 23-10 for Martin Commerce Park, are about urban industrial in agricultural areas including: a proposed <u>new freestanding Urban Service District</u> located miles from the Primary Urban Service District (PUSD) – plus 167 of agricultural acres to be industrial. The 167 currently ag acres is located between a 1,000+ acre agricultural parcel to the east and a 3,000+ acre agricultural parcel to the west that is within the CERP/IRL Natural Lands boundary. These 4,000+ ag acres with natural resources become eligible for developing as residential and commercial just by being within a mile+ from the new freestanding urban boundary. The County already has a large supply of approved but vacant industrial nearby.

Your full analysis is needed to comment/object on whether the CPAs encourage urban sprawl, increase the loss of agricultural lands, fail to protect natural resource including <u>thousands of acres in the</u> <u>CERP boundary</u>, and add to traffic congestion of Martin Highway, a key road and a <u>major evacuation</u> <u>route</u>.

Thank you,

Melissa D'Andola 2601 SW San Antonio Drive Palm City, FL 34990 * The map is from the County's 2021 application for purchase of the red parcel of land by the Florida Forever Program for preservation. The yellow is the CERP/IRL South boundary. Wetland areas are also shown. The lands within the CERP/IRL yellow line that extends north above the red parcel almost the Martin Highway are the 3,000+ acres that would become eligible to residential and commercial just by being within 6,000 ft./1.14 miles from the proposed freestanding Urban Service District for Martin Commons industrial park.



Several of the properties within Allapattah Flats were evaluated in 1996 as potential acquisitions under the Conservation and Recreational Lands and Save Our Rivers

From:	Sam Hay <samhhay@gmail.com></samhhay@gmail.com>
Sent:	Monday, October 14, 2024 8:59 AM
То:	Plan.Review@dep.state.fl.us; d4-planningreviews@dot.state.fl.us; CompPlans@fdacs.gov; ComprehensivePlans@commerce.fl.gov; CompliancePermits@dos.myflorida.com; FWCConservationPlanningServices@myfwc.com; CompPlans@fldoe.org; Stephanie Heidt
Subject:	Please reject overdevelopment proposals for Martin County
Categories:	CPA

To state reviewing agencies:

I strongly oppose the inevitable sprawl and degradation of our natural resources which would be the result of inappropriate development proposals being rushed through the Martin County Commission before our new commissioners are seated. Please reject these proposed changes to our Comprehensive Plan.

Thank you, Sam Hay, Martin County

From:	Dick Landrum <dick@landrumsoftware.com></dick@landrumsoftware.com>
Sent:	Tuesday, October 15, 2024 6:39 PM
То:	Plan.Review@dep.state.fl.us;
	ComprehensivePlans@Commerce.fl.gov; CompliancePermits@DOS.MyFlorida.com;
	FWCConservationPlanningServices@myfwc.com; CompPlans@fldoe.org; Stephanie
	Heidt; d4-planningreviews@dot.state.fl.us
Subject:	Proposed CPAs in Martin County

Proposed CPAs in Martin County

As a resident of Martin County, I would like to comment on the Comp Plan amendments submitted by the Martin County Commissioners for your input.

In case the deadlines on review of Comprehensive Plan Amendments sent by Martin County are not extended due to the hurricane and tornadoes, I am emailing my concerns now.

Martin County CPAs 23-09 and 23-10 involve urban sprawl, negative impacts to CERP/IRL Natural Land preservation and natural resources, congestion to our roadways/our evacuation routes.

CPAs 23-09 and 23-10 for Martin Commerce Park, are about urban industrial in agricultural areas including: a proposed <u>new freestanding Urban Service District</u> located miles from the Primary Urban Service District (PUSD) – plus 167 of agricultural acres to be industrial. The 167 currently ag acres are located between a 1,000+ acre agricultural parcel to the east and a 3,000+ acre agricultural parcel to the west that is within the CERP/IRL Natural Lands boundary. These 4,000+ ag acres with natural resources become eligible for development as residential and commercial just by being within a mile+ from the new freestanding urban boundary. The County already has a large supply of approved but vacant industrial nearby.

Your full analysis is needed to comment/object on whether the CPAs encourage urban sprawl, increase the loss of agricultural lands, fail to protect natural resource including <u>thousands of acres in the CERP boundary</u>, and add to traffic congestion of Martin Highway, a key road and a <u>major evacuation route</u>.

Thank you,

Dick Landrum Palm City, FL 772-286-1324

From:	SHARON <smcginn1@sbcglobal.net></smcginn1@sbcglobal.net>
Sent:	Sunday, October 13, 2024 7:02 PM
То:	Plan.Review@dep.state.fl.us; d4-planningreviews@dot.state.fl.us; CompPlans@fdacs.gov; ComprehensivePlans@Commerce.fl.gov; CompliancePermits@DOS.MyFlorida.com; FWCConservationPlanningServices@myfwc.com; CompPlans@fldoe.org; Stephanie
	Heidt
Subject:	Martin County CPAs 23-09 and 23-10 - OBJECTIONS to approval.
Categories:	CPA

I am a resident of Martin County and I can tell you residents in Martin County appreciate the Governor's and the State Agencies' actions during Hurricane Milton and the related tornadoes and want to express appreciation and concerns for the safety of the personnel. In case the deadlines on review of Comprehensive Plan Amendments sent by Martin County are not extended due to the hurricane and tornadoes, I am emailing my concerns now.

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Your full analysis is needed to comment/**object** on whether the CPAs encourage urban sprawl, increase the loss of agricultural lands, fail to protect natural resource including <u>thousands of acres in</u> <u>the CERP boundary</u>, and add to traffic congestion of Martin Highway, a key road and a <u>major</u> <u>evacuation route</u>.

Thank you,

Sharon McGinnis

Stuart

From: Sent:	Donna S. Melzer <donnasmelzer@gmail.com> Saturday, October 12, 2024 8:39 PM</donnasmelzer@gmail.com>
То:	Plan.Review@dep.state.fl.us; d4-planningreviews@dot.state.fl.us; CompPlans@fdacs.gov; ComprehensivePlans@commerce.fl.gov; CompliancePermits@dos.myflorida.com; FWCConservationPlanningServices@myfwc.com; CompPlans@fldoe.org; Stephanie Heidt
Subject:	Martin County's Transmitted CPAS 23-09 and 23-10 Need More Facts
Categories:	СРА

To: State Agencies Reviewing Comp Plan Amendments for Martin County

I have been a Martin County resident for more than 35 years and have studied many CPAs.

First, I would like to say Thank You for the Governor's, Governor's Staff and the Many Agencies and Staff who worked so effectively to address the Hurricane and Tornado problems. Thank you.

Your Agency is reviewing Martin County Comp Plan Amendments CPA 23-09 and CPA 23-10 for the Martin Commerce Industrial park. The County review of these CPAs failed to address issues with encouraging urban sprawl, accelerating the loss of agricultural lands, negative impacts to natural resources including urbanizing lands in CERP/IRL Natural Lands preservation program, and adding serious traffic to already very congested roads that are a major east-west road and also one of our major evacuation routes.

Not only is this 167 ag acres parcel that is proposed to have a "freestanding Urban Service District" and Industrial miles from the Primary Urban Service District, but over 1,000 agriculture areas to the east of the parcel and over 3,000 acres to the west of the 167 acres becomes eligible for residential and commercial urban uses by being in the 1+ mile vicinity of this proposed "freestanding Urban Service District." as authorized under Martin County Comp Plan Policy 4.13A.18.(A)(1)(b) added in early 2024. The 3,000+ acres in within the CERP/IRL footprint; it is adjacent and north of the Bar-B Ranch that the County applied to have purchased for CERP/IRL by Florida Forever in 2021.

Regarding the traffic issue and a study showing the trips are not too much, it is not specified whether that calculation came with or without consideration of trips needed (i) for the nearby 1,717 acres of AgTEC that is approved (but unbuilt) for manufacturing and other industrial uses, (ii) for the nearby newly approved 36 lots (unbuilt) in the Seven J's Industrial Park where about 25 lots are already developments; and the unbuilt ,3,414 acres of the Newfield village that allows residential, commercial, and over 2Million sq. ft. of industrial; and other residential approvals that front on the same road - Martin Highway.

Thank you in advance for your consideration of these concerns, Donna Melzer Palm City, FL 34990 DonnaSMelzer@gmail.com

From: Sent:	Kate <katmill@ix.netcom.com> Sunday, October 13, 2024 6:57 AM Plan.Review@dep.state.fl.us; d4-planningreviews@dot.state.fl.us; CompPlans@fdacs.gov;</katmill@ix.netcom.com>
То:	Fian. Review@dep.state.n.ds, d4-plainingreviews@dot.state.n.ds, Comp Hans@idacs.gov, ComprehensivePlans@commerce.fl.gov; CompliancePermits@dos.myflorida.com; FWCConservationPlanningServices@myfwc.com; CompPlans@fldoe.org; Stephanie Heidt
Subject:	Martin County CPAs 23-09 and 23-10 - your review for sprawl and impacts on natural resources and traffic, etc.
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Thank you, Kate and Bill Miller, 103 River Rd. Hobe Sound, FL 33455

From:	RENEE Lessard Moreshead <rmld111@aol.com></rmld111@aol.com>
Sent:	Sunday, October 13, 2024 9:13 PM
To:	Stephanie Heidt
Subject:	Sprawl in Martin County
Categories:	CPA

am a resident of Martin County and I can tell you residents in Martin County appreciate the Governor's and the State Agencies' actions during Hurricane Milton and the related tornadoes and want to express appreciation and concerns for the safety of the personnel. In case the deadlines on review of Comprehensive Plan Amendments sent by Martin County are not extended due to the hurricane and tornadoes, I am emailing my concerns now.

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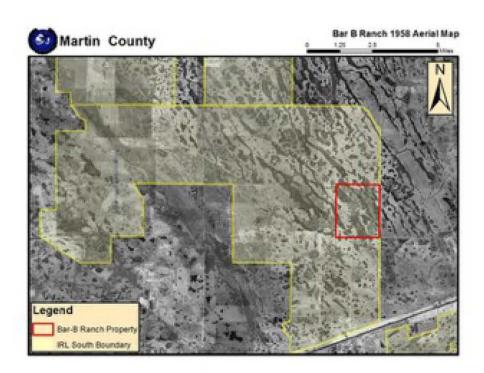
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Thank you,

Renée Lessard Moreshead

* The map is from the County's 2021 application for purchase of the red parcel of land by the Florida Forever Program for preservation. The yellow is the CERP/IRL South boundary. Wetland areas are also shown. The lands within the CERP/IRL yellow line that extends north above the red parcle almost the Martin Highway are the 3,000+ acres that would become eligible to residential and commercial just by being within 6,000 ft./1.14 miles from the proposed freestanding Urban Service District for Martin Commons Industrial.



Several of the properties within Allapattah Flats were evaluated in 1996 as potential acquisitions under the Conservation and Recreational Lands and Save Our Rivers

From: Sent: To:	Lily Nofi <lilynofi@comcast.net> Sunday, October 13, 2024 9:09 PM Plan.Review@dep.state.fl.us; d4-planningreviews@dot.state.fl.us; CompPlans@fdacs.gov;</lilynofi@comcast.net>
	ComprehensivePlans@Commerce.fl.gov; CompliancePermits@DOS.MyFlorida.com; FWCConservationPlanningServices@myfwc.com; CompPlans@fldoe.org; Stephanie Heidt
Subject:	Martin County CPAs 23-09 and 23-10 - your review for sprawl and impacts on natural resources and trafficj, etc.
Categories:	CPA

I am a resident of Martin County and I can tell you residents in Martin County appreciate the Governor's and the State Agencies' actions during Hurricane Milton and the related tornadoes and want to express appreciation and concerns for the safety of the personnel. In case the deadlines on review of Comprehensive Plan Amendments sent by Martin County are not extended due to the hurricane and tornadoes, I am emailing my concerns now.

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Your full analysis is needed to comment/object on whether the CPAs encourage urban sprawl, increase the loss of agricultural lands, fail to protect natural resource including <u>thousands of acres in</u> <u>the CERP boundary</u>, and add to traffic congestion of Martin Highway, a key road and a <u>major</u> <u>evacuation route</u>.

Thank you,

LILY NOFI

4239 SW Mallard Creek Trail, Palm City, FL 34990 (Martin County)

Stephanie Heidt	
From:	Sal Nofi <salnofi@comcast.net></salnofi@comcast.net>
Sent:	Monday, October 14, 2024 1:42
To:	Plan.Review@dep.state.fl.us; d4-

Sent:	Monday, October 14, 2024 1:42 PM
То:	Plan.Review@dep.state.fl.us; d4-planningreviews@dot.state.fl.us; CompPlans@fdacs.gov;
	ComprehensivePlans@Commerce.fl.gov; CompliancePermits@DOS.MyFlorida.com;
	FWCConservationPlanningServices@myfwc.com;
	Heidt
Subject:	Martin County CPAs 23-09 and 23-10 - your review for sprawl and impacts on natural
	resources and trafficj, etc.

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Thank you,

SALVATORE NOFI. JR

4239 SW Mallard Creek Trail, Palm City, FL 34990 (Martin County)

From:	Deana Peterson <deanapeterson@outlook.com></deanapeterson@outlook.com>
Sent:	Sunday, October 13, 2024 7:39 PM
То:	Plan.Review@dep.state.fl.us; d4-planningreviews@dot.state.fl.us; CompPlans@fdacs.gov; ComprehensivePlans@Commerce.fl.gov; CompliancePermits@DOS.MyFlorida.com; FWCConservationPlanningServices@myfwc.com; CompPlans@fldoe.org; Stephanie Heidt
Subject:	Martin County CPAs 23-09 and 23-10 - your review for sprawl and impacts on natural resources and traffic, etc.
Categories:	CPA

I am a resident of Martin County and I can tell you residents in Martin County appreciate the Governor's and the State Agencies' actions during Hurricane Milton and the related tornadoes and want to express appreciation and concerns for the safety of the personnel. In case the deadlines on review of Comprehensive Plan Amendments sent by Martin County are not extended due to the hurricane and tornadoes, I am emailing my concerns now.

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I appreciate your consideration and your attention to this matter.

Much thanks,

Deana

Deana Peterson

221 SE Hibiscus Ave

Stuart FL 34996

From:	carol quackenbos <cquackenbos@gmail.com></cquackenbos@gmail.com>
Sent:	Saturday, October 12, 2024 9:26 PM
То:	Plan.Review@dep.state.fl.us; d4-planningreviews@dot.state.fl.us;
	FWCConservationPlanningServices@myfwc.com;
Subject:	Martin County CPAs 23-09 and 23-10
Categories:	CPA

To Whom it May Concern:

I am a resident of Martin County. As such, I appreciate the Governor's and the State Agencies' actions during Hurricane Milton and the related tornadoes and want to express appreciation and concerns for the safety of your personnel. I am emailing my concerns now in case the deadlines on review of Comprehensive Plan Amendments sent by Martin County are not extended due to the hurricane and tornadoes.

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Thank you for noting my concerns.

Sincerely,

Carol Quackenbos

1778 NW Palmetto Terrace

Stuart, FI. 34994

Stephanie Heidt	
From:	Angela Rantinella <angrlr@comcast.net></angrlr@comcast.net>
Sent:	Sunday, October 13, 2024 4:21 PM
То:	Plan.Review@dep.state.fl.us; d4-planningreviews@dot.state.fl.us; CompPlans@fdacs.gov; ComprehensivePlans@Commerce.fl.gov; CompliancePermits@DOS.MyFlorida.com; FWCConservationPlanningServices@myfwc.com; CompPlans@fldoe.org; Stephanie Heidt
Subject:	Why The Rush?
Categories:	CPA

To Whom It May Concern:

Please tell me why there is such a push to pass changes to the Comprehensive Plan of Martin County when clearly this should wait until after the election and the new BOCC is in place? The majority of residents in Martin County are against urban sprawl and irresponsible growth and have voted in the primary elections to reflect that. It only seems logical that the newly elected officials should represent the citizens in this and all upcoming matters. Why else wouldn't you? I would really appreciate an explanation and truly hope you postpone these very important decisions.

Thank you for your time and consideration, Angela Rantinella`

From: Sent:	M Ryan <mryan2007@gmail.com> Sunday, October 13, 2024 10:50 AM</mryan2007@gmail.com>
То:	Plan.Review@dep.state.fl.us; d4-planningreviews@dot.state.fl.us; CompPlans@fdacs.gov; FWCConservationPlanningServices@myfwc.com; CompPlans@fldoe.org; Stephanie Heidt
Subject:	Martin County CPAs 23-09 and 23-10 - your review for sprawl and impacts on natural resources and trafficj, etc.
Categories:	СРА

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Thank you, Mary Lou Ryan 6032 SE MARTINIQUE DR 104 STUART FL

From:	Virginia Sherlock <vsherlock@lshlaw.net></vsherlock@lshlaw.net>
Sent:	Monday, October 14, 2024 8:39 AM
То:	ComPlans@fdacs.gov;
	FWCCConservationPlanningServices@myfwc.com; d4-planningreviews@dot.state.fl.us; Stephanie Heidt
Cc:	donna.harris@commerce.fl.gov; john.calhoun@floridadep.gov; alissa.lotane@dos.myflorida.com; john.krane@dot.state.fl.us; ajeffers@sfwmd.gov;
	lindsay.weaver@FloridaDEP.gov;
Subject:	Martin County CPAs 23-09 & 23-210: comments/objections
Categories:	CPA

Dear Comprehensive Plan Reviewers:

Please consider the following comments/objections I am submitting as a resident of Martin County regarding Martin County Comprehensive Plan Amendments No. 23-09 and No. 23-10 (Martin Commerce Park), which are entirely inappropriate based on principles of urban sprawl, protection of natural resources, and traffic control.

A large area of Martin County is within the CERP/IRL (Comprehensive Everglades Restoration Plan/Indian River Lagoon) footprint where protection of natural resources is critical. The proposed amendments do not reflect any data and analysis that confirms that establishing a proposed free-standing Urban Services District far outside the urban services boundries will not damage this critical water protection area.

It is clear that allowing a free-standing USD outside the existing boundaries will result in urban sprawl in an agricultural area and add to congestion on roadways, including evacuation routes.

The property includes 167 acres of agricultural lands that are between a 1,000+ acre agricultural parcel to the east and a 3,000+ acre agricultural parcel to the west within the CERP/IRL Natural Lands boundary. If the Martin Commerce Park amendments are approved, these 4,000+ ag acres will be eligible for development as residential and commercial suburban or urban communities because they will be within a mile from a new free-standing USD boundary (see the Rural Lifestyle amendments which were recently approved and expanded to allow development of new residential and recreational communities in previously designated agricultural or preserve lands).

Martin County has a large supply of approved but vacant industrial land near the Martin Commerce Park property, making it unnecessary to convert existing agricultural land to industrial use.

The loss of valuable agricultural lands is detrimental to all residents of Martin County and our established growth management plan. CPAs 23-09 and 23-10 will result in

damage to natural resoucres including thousands of acres within the CERP boundary and will increase already burdensome traffic congestion on Martin Highway, which is a major evacuation route.

Please carefully review these amendments and send them back to the Martin County Board of County Commissioners for revision.

Thank you.

Virginia P. Sherlock

534 SE Madison Avenue

Stuart, FL 34996

From: Sent:	SHARI TOBIAS <setobias@bellsouth.net> Sunday, October 13, 2024 3:19 PM</setobias@bellsouth.net>
To:	Plan.Review@dep.state.fl.us; d4-planningreviews@dot.state.fl.us; CompPlans@fdacs.gov;
	ComprehensivePlans@Commerce.fl.gov; CompliancePermits@DOS.MyFlorida.com; FWCConservationPlanningServices@myfwc.com; CompPlans@fldoe.org; Stephanie Heidt
Subject:	Comp plan Martin County
Categories:	CPA

Sample Email <u>Subject</u>: Martin County CPAs 23-09 and 23-10 - your review for sprawl and impacts on natural resources and trafficj, etc.

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Thank you,

Shari Tobias

1624 SW St Andrews Drive

Palm City, FL 34990

From:	Hymowitz, Larry	
То:	dcpexter@commerce.fl.gov; Paul Schilling	
Cc:	<u>Clyde Dulin; Samantha Lovelady; Lisa Wichser; Ricardo Vazquez; Williams, Jana; Carver, Jennifer; Krane, John;</u> <u>Martinez, Cesar; Peters, Victoria; Walia, Kent; Bush, Lois; Kareiva, Ronald; Wong, Chon; Norat, Tony; Budhu,</u> Kelly; Stephanie Heidt	
Subject:	Martin County 24-3 ESR - FDOT District Four Review	
Date:	Thursday, October 24, 2024 4:54:34 PM	
Attachments:	image001.png image002.png image003.png	

?

Pursuant to Secon 163.3184(3), Florida Statutes (F.S.), in its role as a reviewing agency as identified in Sections 163.3184(1)(c) and 163.3184(4)(c), F.S., the Florida Department of Transportation (FDOT) reviewed the proposed Martin County 24-03ESR (CPA 23-10) comprehensive plan amendment relating to the Comprehensive Plan Future Land Use Map for the Martin Commerce Park, to change the subject ±167 acres from Agricultural and Agricultural Ranchette to Industrial. This amendment is being considered concurrently with Text amendment, CPA 23-09 (24-2ESR) Martin Commerce Park LLC Text, proposed for this property to extend water and sewer service, create a Freestanding Urban Service District, and place restrictions on development.

FDOT is providing the following technical assistance comments and recommendations consistent with Section 163.3168(3), F.S. These technical assistance comments are intended to strengthen the County's comprehensive plan to foster a vibrant, healthy community and are designed to support the Department of Commerce (FloridaCommerce) in its consistency determination with the Community Planning Act in Chapter 163, Part II, F.S.

Technical Assistance Comment #1

In accordance with Section 163.3180(5)(h)1.a, F.S., consultation with FDOT is required for comprehensive plan amendments that affect the Strategic Intermodal System (SIS). We have no record of meeting with Martin County staff prior to submittal of this amendment. The purpose for such consultation with the Department is to identify important state resources and facilities that may be adversely impacted in the future if the amendments are adopted, discuss analysis methodology, and potential mitigation strategies for the local government to consider as part of the amendments.

This SIS consultation should normally include the applicant and their traffic consultant and involve a discussion of the traffic methodology to be used for plan amendment traffic analyses. The analysis for this amendment, based on the maximum development potential of the proposed land use designations, is inconclusive regarding adverse impacts to the SIS and transportation facilities of state importance (Martin Highway/SR-714) due to issues with the traffic impact analysis.

Recommendation for Technical Assistance Comment #1

The Department recommends that the County conduct future consultations with FDOT when necessary, per Section 163.3180(5)(h)1.a, F.S. This type of consultation should be coordinated early to provide opportunities to discuss best planning practices, and opportunities to contribute to access management and traffic methodology discussions prior to transmittal of future amendments that have the potential to adversely impact facilities on the SIS.

Technical Assistance Comment #2

The amendment identifies projected transportation system levels of service but does not appear to properly identify system needs based upon the future land use map and the projected integrated transportation system pursuant to 163.3177(6)(b)1(d), F.S. Furthermore, the amendment does not appear to identify how the local government will correct existing facility deficiencies, meet the identified needs of the projected transportation system, and advance the purpose of this paragraph and the other elements of the comprehensive plan pursuant to 163.3177(6)(b)1(e), F.S.

The Department has identified important state resources and facilities that may be adversely impacted if the amendments are adopted. This was determined by reviewing the CPA 23-10, Martin Commerce FLUM

Amendment Staff Analysis, particularly the Interoffice Memorandum dated March 5, 2024 (amendment package page #1514), and the Traffic Impact Analysis (TIA) for the Martin Commerce Park Land Use Plan Amendment by O'Rourke Engineering & Planning (amendment package page #1575). The adversely impacted facilities include State Road 714 (Martin Highway) from I-95 to Citrus Boulevard and potentially, impacts to portions of the I-95/State Road 714 interchange.

<u>State Road 714 (I-95 to Citrus Boulevard)</u> – The Martin County Interoffice Memorandum indicates there is not sufficient roadway capacity planned in the adopted long-range capital facility plans of the Comprehensive Growth Management Plan to support the transportation facility needs of the proposed development at the adopted level of service (LOS).

The Department identifies a number of concerns with how the TIA analyzes traffic

for the proposed development. For instance, the latest available capacities from the Martin County 2023 Roadway Level of Service Inventory Report were not used for the analyses in the TIA. Per Section 5.4.B.(Analysis and LOS standards) of the Comprehensive Plan Transportation Element, the generalized tables are found in the FDOT's latest Q/LOS Handbook and are incorporated herein by reference. This updated version of the report incorporates context classification into the determination of roadway capacities. There is also a discrepancy between the County's listed context classification of C3R (Suburban Residential) for SR-714 from I-95 to Citrus Boulevard and the Department's Project Level Context Classification of C2 (Rural).

Justifications for the C2 context classification include the following.

- State Road 714 has a Federal Functional Classification of Rural Principal Arterial (Other).
- State Road 714 is partially outside of the draft 2020 FHWA Urban Area Boundary.
- The Department's designation stems from an analysis of the eight primary measures and six secondary measures, as included in the FDOT Context Classification Guide, pdf page 24 (<u>https://nflroads.com/CS/Context%20Classification%20Guide%202022_lo</u> <u>-res.pdf</u>). The analysis is available if requested.

The difference in Context Classification impacts the service volume capacity for roadways. The C2 context classification established by the Department results in a 730 vehicle peak hour peak direction capacity at LOS D vs. the 1,160 vehicle capacity from the TIA (1,070 from the FDOT 2023 Multimodal Quality/Level of Service Handbook) applicable to the C3R context classification. It is unclear how context classifications used by the County in the Martin County 2023 Roadway Level of Service Inventory Report were determined. Using the C2 capacity for State Road 714, this roadway will operate with a failing LOS. There are no projects in the Martin Metropolitan Planning Organization (MPO) 2045 Long-Range Transportation Plan (LRTP) to expand this roadway section from two to four lanes. The County's 2045 Transportation Map Roadway Lanes (Figure 5-5C) does not identify any capacity needs east of the project driveway to Citrus Boulevard.

<u>I-95 / State Road 714 Interchange (SIS facility)</u> - There is insufficient information in the TIA to determine if adverse impacts to the SIS will result from the amendment. The I-95 Treasure Coast Multimodal Master Plan (2020) identifies

the need for capacity improvements and an urbanization of the interchange. Any funding would be slow to occur and is estimated to occur in the 2035-2040 time band of the SIS Cost Feasible Plan 2035-2050 (2024 Edition).

Additional technical comments regarding the TIA include the following:

- A. **Roadway Network** (PDF page 92): According to FDOT's 2024 *Multimodal Transportation Impact Analysis (MTIA) Handbook,* a Comprehensive Plan Amendment's (CPA) MTIA should identify all state-maintained roadways and SIS facilities located within a three-mile radius from the parcel(s) affected by the CPA. Please include <u>link</u> analysis for I-95 segments north and south of SR-714/Martin Highway.
- B. **Trip Generation, Table 2** (PDF page 94): Please justify the 10% pass-by or remove.
- C. Project Assignment (PDF page 96): The report notes that "the study area was defined as the area upon which the project traffic represents 2% or more on the roadway link or the immediately adjacent link." Martin County Comprehensive Plan's Transportation Element Section 5.6 Policy 5.2A.7 (2) (f) states "The project has de minimis traffic impacts (defined as an impact that would not affect more than <u>1 percent</u> of the maximum volume of the affected transportation facility at the adopted level of service) ...". Please provide clarification or revise the percent impact analysis accordingly.
- D. Five Year Analysis 2028, Long Range Analysis 2040/2045 (PDF page 96): Analysis and appendix show that the 2022 volumes from Martin County Roadway Level of Service Inventory Report were used. However, the write-up notes 2021 volumes were used. Please clarify or revise as needed.
- E. **Trip Distribution** (PDF page 97): For an industrial use facility, most of the trips are expected to be longer distance. Some notable comments are below:
 - Given the location of the development relative to I-95, 20% each to north and south on I-95 appears to be low.
 - Eight percent (8%) total on the Turnpike ramps appear to be low.
 - Fifteen percent (15%) assigned to Citrus Boulevard/SW Newfield Parkway appear to be high.

- F. Link Analysis (PDF pages 99 and 101): Martin County's proposed development projects database shows several approved and in-review developments in the vicinity of the site. A comprehensive review of all these developments should be completed and their trips should be included as committed trips for the "background" traffic.
- G. Link Analysis 5 Year, Table 5 (PDF page 99): Please double check the growth rate for SR-714/Martin Highway from Citrus Boulevard to Florida's Turnpike, as it appears to be incorrect.
- H. Link Analysis 2040/2045, Table 7 (PDF page 101): The 2040 daily model volumes for SR-714/Martin Highway from I-95 to Citrus Boulevard (10,110) is significantly less than the 2022 AADT (14,900). It should be noted that the 2021 volume for this segment is 16,900 and the 2023 volume is 17,000. Reasonableness check of the model output should be performed, and adjustment should be made, if needed.

Recommendations for Technical Assistance Comment #2

- The Department recommends that the traffic analysis be revised and coordination occur with the Department prior to adoption of the amendment to incorporate the correct approach and data. This will allow the Department to accurately assess impacts on State facilities and further identify and plan for mitigation of any deficiencies.
- 2. The County should consider multiple strategies to eliminate, reduce, or mitigate the adverse impacts to State Road 714 and potentially to the I-95 interchange intersections and ramps. This could involve the following potential strategies.
 - Development phasing This involves the incremental approval of portions of the development based on the operational impacts on State Road 714 and the interchange, available programmed funding for construction, and planned future funding allocations at the time of development. The adoption of this amendment should address the potential of this strategy to minimize adverse impacts to the state highway system.
 - Consultation with the Martin MPO regarding inclusion of a State Road 714 capacity project in the MPO 2050 LRTP update process and to identify it as a priority for programming in the MPO List of Priority Projects.

- Consultation with FDOT regarding advancement of an interchange modification project for the State Road 714 / I-95 interchange in the SIS Cost Feasible Plan 2035-2050 (2024 Edition) from the 2035-2040 time band into the FDOT SIS Approved 2nd 5-Year Plan.
- Update various applicable elements of the Martin County Comprehensive Plan, including the Comprehensive Plan (CGMP) Figures, to address the capacity needs associated with this amendment and other potential future growth for internal consistency (Section 163.3177(2), F.S.).

We appreciate the opportunity to review proposed amendment changes prior to adoption and request that a copy of the adopted amendment, along with the supporting data and analysis, be transmitted within ten (10) working days after the second public hearing to <u>d4-planningreviews@dot.state.fl.us</u>.

If you have any questions, please do not hesitate to contact me.



Larry Hymowitz Planning Specialist, Policy and Mobility Planning Section Planning & Environmental Management - FDOT District Four p: (954) 777-4663 f: (954) 677-7892 a: 3400 W. Commercial Boulevard, Pt. Lauderdale, FL 33309 e: larry.hymowitz@dot.state.fl.us w: www.dot.state.fl.us



Together our actions have the power to save lives!



From:	Paul Schilling
To:	Samantha Lovelady
Subject:	FW: FWC's Comments on Martin County 24-02ESR (23-09) and Martin County 24-03ESR (23-10) – Martin Commerce
	Park
Date:	Friday, October 18, 2024 3:07:11 PM

Paul Schilling Director Growth Management Department Martin County Board of County Commissioners 772-288-5473

From: Paul Schilling
Sent: Friday, October 11, 2024 1:20 PM
To: Clyde Dulin <cdulin@martin.fl.us>; Joan Seaman <jseaman@martin.fl.us>; Maria Harrison
<mharriso@martin.fl.us>
Subject: FW: FWC's Comments on Martin County 24-02ESR (23-09) and Martin County 24-03ESR (23-10)
– Martin Commerce Park

Paul Schilling Director Growth Management Department Martin County Board of County Commissioners 772-288-5473

From: Irving, Robert <<u>Robert.Irving@MyFWC.com</u>>
Sent: Friday, October 11, 2024 1:11 PM
To: Paul Schilling <<u>pschilli@martin.fl.us</u>>
Cc: Conservation Planning Services <<u>conservationplanningservices@MyFWC.com</u>>;
DCPexter@Commerce.fl.gov; Colletier, Nicolas <<u>Nicolas.Colletier@MyFWC.com</u>>;
Jhahner@ewconsultants.com; kenpruittp5@gmail.com
Subject: FWC's Comments on Martin County 24-02ESR (23-09) and Martin County 24-03ESR (23-10) Martin Commerce Park

	?	
Doon Mr. Sobilling		

Dear Mr. Schilling:

Florida Fish and Wildlife Conservation Commission (FWC) staff reviewed the proposed comprehensive plan amendment in accordance with Chapter 163.3184(3), Florida Statutes. We have no comments, recommendations, or objections related to listed species and their habitat or other fish and wildlife resources to offer on this amendment.

FWC staff appreciates the opportunity to review this project. Please send any requests for further information to <u>ConservationPlanningServices@MyFWC.com</u>.

Sincerely,

Robert Irving Land Use Planning Program Supervisor Office of Conservation Planning Services Florida Fish and Wildlife Conservation Commission Phone: (850) 354-3578

Martin County 24-02ESR_60099 / Martin County 24-03ESR_60101