

**LEON COUNTY
GROWTH AND ENVIRONMENTAL MANAGEMENT
DEVELOPMENT SERVICES
TECHNICAL STAFF REVIEW COMMENTS**

October 14, 2009

Project: Chason Woods Conservation Subdivision – Type “C” (LSP090035)
Applicant: J&T, LLC
3554 Fair Oaks Ln
Longboat Key, FL 34228
941-350-8527
Agent: Moore Bass Consulting, Inc.
c/o Eddie Bass, P.E.
805 N. Gadsden St
Tallahassee, FL 32303
850-222-5678
Parcel I.D. 46-13-20-403-000-0
Future Land Use Category: Urban Fringe (UF)
Zoning District: Urban Fringe (UF)
Parcel Size: 697.16 ± acres
Location: Located east of SR-61 (Wakulla Springs Rd), apprx ½ mile south of Oak Ridge Rd at the northeast intersection of County Line Rd and SR-61.
Roadway Access & Class: County Line Rd (local roadway); Sunflower Rd (minor collector)
Infrastructure (stormwater mgt.): County maintained infrastructure
Water/Sewer/
Electric Utilities: City of Tallahassee
Staff Planner: Ryan Culpepper, Development Services Administrator
Approval Body: Board of County Commissioners

Project Summary: The referenced parcel is located in the Urban Fringe (UF) zoning district and is designated UF on the Future Land Use Map of the Comprehensive Plan. The parcel is located outside the Urban Service Area (USA). The parcel consists of approximately 697.16 acres. Approximately 306 acres (46%) of the site is encumbered with floodplain. The application proposes the construction of a 523-lot single-family residential subdivision. The application proposes to develop the site as a conservation subdivision, placing approximately 62% of the site, which contains environmentally sensitive areas, in conservation and developing the remaining 38% of the site unencumbered with environmental constraints. According to the applicant’s narrative, the application proposes a density of 1.33 dwelling units per acre. Access to the site is proposed via connections to Sunflower Road and County Line Road. The application also indicates that central sanitary sewer and central potable water will be extended to the site and provided by the City of Tallahassee. The closest central sanitary sewer system is approximately 5-6 miles north of this site. The proposed density can not be attained without the provision of central sanitary sewer.

Pursuant to Table 10-7.1 of the LDC, the development of 75 dwellings or up to the Development of Regional Impact (DRI) threshold for residential dwelling units in the Urban Fringe zoning district will require, at a minimum, a Type "C" site and development plan review (Section 10-7.405). Type "C" site and development plans require final disposition from the Board of County Commissioners (BCC). This pre-application conference represents a preliminary step within the process established by the Code to secure approval (the final step is approval of a Type “C” site and development plan application by the Board of County Commissioners).

The proposed subdivision will also require platting, in accordance with Section 10-7.203 and Section 10-7.601 of the LDC. The platting process can add up to six additional weeks to the development schedule. No building permits shall be issued for a project that requires a plat until the plat has been accepted by the Board of County Commissioners and recorded in the plat books of the county.

Development Services Division Comments:

The Leon County Department of Growth and Environmental Management has received an application for the development of property located as described above. This application is subject to review by the standards established by Leon County for a Type "C" Site and Development Plan application.

REQUIREMENTS FOR PROJECT APPROVAL

Pursuant to Florida law, determination as to whether development applications warrant approval shall be based solely upon whether the applications demonstrate consistency with the Comprehensive Plan and compliance with applicable land development regulations. Other factors may not be used as a basis to support approval or denial of development applications

In accordance with Section 10-7.108(a), Leon County Land Development Code, all proposed subdivision or development shall be consistent with the adopted Comprehensive Plan, as amended. In addition, pursuant to Article VII, Section 10-7.407, Leon County Land Development Code, to be approved, a site and development plan must demonstrate compliance with the following:

1. applicable provisions of Article VI of the Development Code, Zoning;
2. applicable provisions of Article IV of the Development Code, Environmental Management; and,
3. the Land Development Code and other applicable regulations or ordinances which impose specific requirements on site and development plans and development.

Development Application Review Process:

The subject property is zoned Urban Fringe (UF) and is located outside the Urban Service Area (USA). The UF zoning district is intended to provide for low-intensity development that can be accommodated without a full complement of urban services and infrastructure. The district is primarily intended to allow low density residential of no greater than one unit on three acres of land, agricultural, and silvicultural activities. The application will be required to demonstrate compliance in regards to infrastructure, sidewalks and landscaping and natural area requirements of the Leon County Land Development Regulations (LDC).

Pursuant to Section 10-7.204, conservation subdivisions are allowed in the UF district. Conservation subdivisions shall be reviewed and authorized pursuant to the site and development plan review and approval procedure provisions of Division 4, Article VII of Chapter 10 of the LDC. In addition to submittals required for appropriate review under other provision of the LDC, the following submittals shall also be required:

- a) A land preservation plan, showing all existing vegetation and proposed changes and new planting, if any; and,
- b) A geographic features and land use map of all land within 500 feet of the site that shall indicate floodplains, area hydrography, publicly or privately managed parks or preserves, and adopted or proposed greenways.

According to the Leon County Geographic Information System (GIS), the parcel is located within the Ames Sink Watershed and the Sunflower Watershed. The site is located entirely within the Lake Munson Drainage Basin. The environmental constraints and any required infrastructure and landscaping will further reduce the amount of developable area. A Natural Features Inventory (NFI) shall be required and will help verify the presence and significance of any additional features that may be present. The NFI must be approved by the Environmental Compliance Division prior to scheduling a Technical Review Meeting. An Environmental Impact Analysis (EIA) will also be required for review and approval by the Environmental Compliance Division. The applicant must receive approval of the EIA prior to submittal of the application to the Development Review Committee (DRC) for review and recommendation.

Significant environmental features prevail over most of the site (with more occurrences on the central and western portion). Some of the environmental constraints identified and mapped as part of a previously approved Natural Features Inventory (NFI) are as follows: active and inactive karst features, wetlands, waterbodies, floodplains, gopher tortoise habitat, and high quality successional forest. The site is located in what is referred to as the "Woodville Karst Plain," which is an area determined to be quite vulnerable to groundwater degradation compared to most other areas of the county. Scientific analysis has concluded that the geological composition of the thin confining layers of the Karst region limit the rate of interaction between the surface and the Florida Aquifer (FDEP, Summary and Synthesis of the Available Literature on the Effects of Nutrients on Spring Organisms and Systems)

The proposal is now at the initial stage of this review, the preapplication conference. The purpose of the preapplication conference is to set forth the specific application requirements; i.e., what the application must demonstrate to secure approval. After the preapplication conference, the proposal is to be revised, based on the comments received at the preapplication conference, and undergo additional informal review by technical review staff, at the tech staff review meeting. After this stage, the application is expected to be further fine-tuned before submittal to the Development Review Committee (DRC). The proposal is then submitted to the DRC for their review and recommendation. The DRC is composed of one voting representative from each of the following Departments: Growth and Environmental Management, Public Works, and Planning. The application, along with the DRC's recommendation, then proceeds to the Leon County Board of County Commissioners for final review and disposition at a public hearing.

All of the meetings referenced above are public meetings, however, public testimony is taken only at the pre-application conference and the Board's public hearing; in addition, the applicant is entitled to speak at all meetings except the DRC meeting. Written testimony or comment regarding the application may be provided to the Department of Growth and Environmental Management at any time prior to the Board's public hearing on the application.

DEVELOPMENT SERVICES STAFF FINDINGS:

Finding #1. Comprehensive Plan Issues.

The site is designated Urban Fringe on the Future Land Use Map of the Comprehensive Plan. The Tallahassee Leon County Planning Department must determine that this application is consistent with the Comprehensive Plan in order for it to be approved.

Comments:

Please refer to attachment #2, dated October 14, 2009, from the Planning Department.

Finding #2: Concurrency, Section 10-3.106 of the LDC.

The application shall provide documentation from Concurrency Management that demonstrates the proposed amendment will comply with Article III of the Leon County Land Development Code (LDC), Concurrency Management. Contact Concurrency Management at 850-606-1300.

Comments:

No final development order can be issued unless there is sufficient, available capacity to meet the level of service standards for the existing population, vested development, and for the proposed development. Also a final development order and final certificate of concurrency cannot be issued without documentation from the Leon County School Board that school concurrency has been satisfied. On October 14, 2009, the applicant submitted a Notice of Intent to Negotiate a Concurrency Agreement. As a result, a preliminary certificate of concurrency was issued on October 14, 2009 (see attachment #6).

Deficiencies:

- a) *The application shall satisfy all concurrency requirements prior to final site and development plan approval.*

Finding #3. Environmental Management, Article IV of the LDC.

The storm drainage and surface water drainage system used shall be installed in accordance with Article IV and other requirements and specifications of the county. In addition, the application must comply with the regulations and standards set out in the following sections of Article IV:

Topographic alterations: Section 10-4.327.

Stormwater management facilities: 10-4.303.

Protected Trees: Section 10-4.362.

Tree Protection Requirements: Section 10-4.363.

Pre-Development Reviews: Section 10-4.202.

Comments:

A Natural Features Inventory was approved with conditions on October 8, 2009. An Environmental Impact Analysis is required and shall be approved prior to placement of the site and development plan application on the DRC's agenda. Please refer to the comments from Environmental Compliance in attachment #3. Also refer to the comments in Attachment #1.

Finding #4. Urban Fringe Zoning District & Conservation Subdivisions, Sections 10-6.613 and 10-7.204 of the LDC.

The Urban Fringe zoning district is intended to provide for low-intensity development that can be accommodated without a full complement of urban services and infrastructure. The district is primarily intended to allow low density residential of no greater than one unit on three acres of land, agricultural, and silvicultural activities.

Pursuant to Section 10-7.204, conservation subdivisions are allowed in the UF district. Conservation subdivision design is encouraged to advance environmental resource protection or restoration by analyzing the development parcel so as to locate and coordinate appropriate areas for development and conservation. Such development shall permanently set aside preservation features and canopy road protection zones and, to the greatest extent practicable, other functional open space and sensitive natural resources.

Conservation subdivisions shall be reviewed and authorized pursuant to the site and development plan review and approval procedure provisions of Division 4, Article VII of Chapter 10 of the LDC. In addition

to submittals required for appropriate review under other provision of the LDC, pursuant to Section 10-7.204(c)(1), the following submittals shall also be required:

- c) A land preservation plan, showing all existing vegetation and proposed changes and new planting, if any; and,
- d) A geographic features and land use map of all land within 500 feet of the site that shall indicate floodplains, area hydrography, publicly or privately managed parks or preserves, and adopted or proposed greenways.

Conservation subdivisions shall be made up of two distinct areas: the reserve area and the development area. Pursuant to Section 10-7.204(f)(1), the reserve area shall comprise no less than 50% of the total parcel and shall be contiguous and continuous to the greatest extent practicable with other portions of the site including the reserve area. The reserve area shall be placed under a permanent easement that runs with the land. Subject to approval by the county, the easement may be assigned to the local government or to an existing land trust that is a 501(c)(3) organization for which conservation of resources is a principal goal and which can provide reasonable assurance it has the financial and staff resources to monitor and manage the easement.

Pursuant to Section 10-7.204(f)(2), the development area shall include that portion of the parcel proposed for development at the density established for the land use category and base zoning applicable to the subject property. The development area shall be located on the least environmentally or otherwise significant portions of the total conservation subdivision parcel in accordance with the applicable provisions of Section 10-7.204(f)(1) paraphrased above. The development area shall comprise no more than 50% of the total conservation subdivision parcel; be contiguous and configured in such a manner as to not adversely interfere with continued farming or silviculture uses in the reserve area; and allow maximum open space to be easily maintained in the reserve area.

Comments:

The application proposes to construct a 523-lot single-family residential subdivision utilizing the conservation subdivision provision of Sec. 10-7.204. The application proposes placing approximately 62.15% of the site, which contains environmentally sensitive areas, in conservation and developing the remaining 37.85% of the site unencumbered with environmental constraints. Conservation subdivisions shall be density neutral. The maximum density in the development area of a conservation subdivision shall be one (1) dwelling unit per 1.33 gross acres of the total parcel. According the applicant's narrative, the application proposes a density of 1.33 dwelling units per acre, which is consistent with the allowed density for a conservation subdivision on the subject parcel.

However, the applicant has requested a deviation from Section 10-7.204(d) of the LDC, which requires a minimum lot size of 0.5 acre for each lot within a conservation subdivision. Please refer to the deviations section in Finding #13.

Deficiencies:

- a) *The application does not provide a land preservation plan as required in Section 10-7.204(c). A land preservation plan shall be provided to staff and shall be approved prior to final site and development plan review.*
- b) *The site and development plan does not demonstrate compliance with Section 10-7.204(d), the 0.5 acre minimum lot size requirement for applications utilizing the conservation subdivision provision. The applicant has, however, submitted a request for deviation from this requirement. The applicant's request for this deviation is considered in conjunction with this application, but requires separate findings, recommendation, and motion by the Board of County Commissioners (BCC). The Department's analysis of the requested deviation is addressed in a separate portion*

of this report. The applicant shall receive approval from the Board of County Commissioners (BCC) for the deviation from the minimum lot size requirement of this section prior to finding the application complete. Otherwise, the application shall be revised to demonstrate compliance with the 0.5 acre minimum lot size requirement.

- c) On Sheet 4.8 of the site plan, Lots 10-11 Block "X" and Lot 1 Block "W" are shown as comprising less than 0.25 acres. The deviation request does not address these smaller lot sizes. Therefore, if the applicant intends to keep these lot sizes, then the deviation request shall be revised. Otherwise, the site plan shall be revised to increase the size of these lots to 0.25 acres to be consistent with the deviation request or consistent with the 0.50 acre minimum lot size.*
- d) The site and development plan application does not provide information as to the management entity for the reserve area, as required in Section 10-7.204(f)(1)(h). The reserve area may be assigned to the local government. The site plan indicates placement of the reserve area into a conservation easement inuring to Leon County, with maintenance by the Homeowner's Association (HOA). The HOA or other managing entity, must qualify as a 501(c)(3) organization and demonstrate assurance that it has the financial and staff resources to monitor and manage the easement. Additionally, the narrative indicates that the applicant has not located an organization that would adequately care for and maintain the conservation area. The entity of which will qualify as a 501(c)(3) organization for the maintenance of the conservation area shall be designated prior to placement of the site and development plan application on the DRC's agenda.*

Finding #5. Buffer Zone Standards, Section 10-7.522 of the LDC.

A buffer zone is a landscaped strip between adjacent land uses that is intended to serve a screening function, as well as, provide an attractive boundary between parcels. The width or degree of vegetation within a buffer zone depends on the type of land use(s) on adjacent parcels. The required widths and degree of vegetation plantings for all buffers are outlined in this section.

Comments:

According to buffer chart found in Section 10-7.522, the proposed development will require additional buffering. A type "A" buffer shall be required along the perimeter of the site adjacent to properties zoned Residential Preservation (RP) and developed with single-family homes. Please also refer to any additional comments from Environmental Compliance in attachment #3.

Deficiencies:

- a) The application indicates a "homeowner's association open space" along the perimeter of the site adjacent to developed properties zoned RP. However, it is unclear whether this area is intended to satisfy the Type "A" buffer requirements. The site plan shall be revised to demonstrate compliance with the buffer standards by providing the Type "A" buffer as required along the perimeter of the site adjacent to parcels zoned RP and developed with single-family homes.*

Finding #6. Special Regulatory Districts. Conservation/Preservation Area, Sections 10-6.704 and 10-6.705 of the LDC.

The proposed development must comply with all applicable regulations pertaining to conservation and/or preservation areas Article IV of the Leon County Land Development Code, and the Conservation and Land Use Element of the 2010 Comprehensive Plan) if the environmental analysis identifies any preservation and/or conservation areas on the subject parcel. The site and development plan must clearly indicate significant environmental features or constraints located on or adjacent to the subject property and ensure that the proposed site and development plan accommodates these features.

Comments:

The site and development plan proposes placement of approximately 62% of the site (the reserve area), which contains environmentally sensitive areas, in conservation and developing the remaining 38% of the site unencumbered with environmental constraints. Please also refer to the comments from Environmental Compliance. (See attachment #3)

Deficiencies:

- a) *The site and development plan application does not provide information as to the management entity for the reserve area, as required in Section 10-7.204(f)(1)(h). The reserve area may be assigned to the local government. The site plan indicates placement of the reserve area into a conservation easement inuring to Leon County, with maintenance by the Homeowner's Association (HOA). The HOA must qualify as a 501(c)(3) organization and demonstrate assurance that it has the financial and staff resources to monitor and manage the easement. Additionally, the narrative indicates that the applicant has not located an organization that would adequately care for and maintain the conservation area. The entity of which will qualify as a 501(c)(3) organization for the maintenance of the conservation area shall be designated prior to placement of the site and development plan application on the DRC's agenda.*

Finding #7. Parking and Loading Requirements, Section 10-7.544 of the LDC.

Parking for residential uses is based on the number of bedrooms per unit. The off-street parking requirements for conventional single family homes is 2 spaces for 1, 2 and 3 bedroom units and 3 parking spaces for 4 bedroom units.

Comments:

The application proposes to construct 523 single-family residential lots. The application provides a typical lot layout for both the 0.25 acre lot size and the 0.5 acre lot size. The proposed lot layouts indicate the use of side or rear-loaded garages. Both layouts appear to demonstrate sufficient off-street parking for residential uses.

Finding #8. General Layout and Design Standards, Section 10-7.502 of the LDC.

The proposed plan of development shall comply with the general layout and design standards in this section. This will include streets, driveways, lots and lot designs, stormwater management areas, pedestrian and bikeways and facilities, proposed utility locations including easements, public/private street designations, utility systems and protection of natural features.

Comments:

Growth and Environmental Management typically defers to Public Works. Please refer to comments from Public Works. (See attachment#4).

Deficiencies:

- a) *Based on the current design of the site, staff has determined that the east-west roadway that traverses the site will require designation as a minor collector roadway.*

Finding #9. Stormwater Management, Section 10-7.521.

The stormwater standards must be met for this proposed development. The storm drainage and surface water drainage system used shall be installed in accordance with Article IV and other requirements and specifications of the county.

Comments:

Please refer to comments from the Environmental Compliance Division (attachment #3) and Public Works (attachment #4) for additional information.

Finding #10. Signage, Article IX of the LDC.

The site and development plan shall demonstrate compliance with the sign regulations of this section.

Comments:

The application proposes to create signage easements near the location of the three (3) entrances to the proposed subdivision off County Line Road. The application also provides annotation which states that the proposed signage shall comply with Article IX of the LDC. Therefore, the application appears to be compliant with this section.

Finding #11. Provision of Affordable Workforce Housing.

Pursuant to Florida Statute 380.0651, development of 500 or more dwelling units on the referenced site exceeds the residential threshold for residential development and would require review as a Development of Regional Impact (DRI). However, the application contains a letter from the Department of Community Affairs (DCA) dated May 11, 2009, which states that the applicant is committing to the provision of a minimum of 15% of the proposed 523 total dwelling units to affordable workforce housing [F.S. 380.0651(3)(j)], which equates to approximately 78 affordable workforce housing units. The referenced letter also indicates that construction of the 78 affordable workforce housing units will commence prior to the completion of 50% of the market rate dwelling units. As a result of the commitment to provide the affordable housing units, the DRI threshold for residential is increased 50% and will not require the proposed development to submit for DRI review.

Comments:

The application designates a portion of the development as being dedicated to affordable workforce housing. The site plan notes indicate that Lots 21-35 Block “T”, Blocks “Q”, “U”, “V” and “Y” are designated affordable workforce housing.

Deficiencies:

- a) *The site plan notes which lots are designated affordable workforce housing, however, each applicable plan sheet(s) of the site plan shall be revised to clearly identify which lots and/or blocks are designated affordable workforce housing. This could be accomplished through hatching or shading of the lot and/or blocks being set aside for this purpose.*
- b) *The information submitted with the application do not provide information on how the developer intends to facilitate compliance with the standards noted in F.S. 380.0651(3)(j). More specifically, the site and development plan does not provide estimated sales prices, or address any mechanisms that will be utilized to ensure recipients of the workforce housing units will be within eligible income levels and that units will remain affordable over time.*

Finding #12. Other Application Comments and Deficiencies.

The application shall address the comments and deficiencies of other technical staff reviewers, such as, but not limited to, Aquifer Protection, Fire Department and the utility provider(s).

Comments:

The application received clearance from Aquifer Protection on September 24, 2009. Please also refer to the comments from Adam Biblo in attachment #1.

Deficiencies:

- a) *The narrative and annotation on the site plan indicates that the proposed development will be constructed in phases. However, the site plan does not provide a clear illustration of the phase line delineations. Therefore, the site plan shall be revised to provide a clear delineation between the different phases (i.e. thicker line or darker print). Additionally, the site plan shall be revised to provide a phasing schedule.*

- b) The application shall be revised to provide documentation from the Tallahassee Fire Department which demonstrates compliance with their requirements.*
- c) The application shall be revised to include documentation from the City of Tallahassee which indicates approval of the utility concept plan for this development.*
- d) The site and development plan shall be revised to address the comments in the memorandum from Adam Biblo, dated October 13, 2009. See attachment #1.*

Finding #13. Deviation from Development Standards, Section 10-1.106(c) of the LDC.

The entity with the authority to approve, approve with conditions, or deny a site and development plan may grant a deviation under this section only upon demonstration that:

1. The deviation will not be detrimental to the public's health, safety, or welfare or to the surrounding properties; and
2. There are exceptional topographic, soil, or other environmental conditions unique to the property; or
3. There are unusual conditions which are not ordinarily found in the area; or
4. The deviation requested would provide a creative or innovative design alternative to substantive standards and criteria; or
5. The strict application of the requirements of this ordinance will constitute a substantial hardship to the applicant; and,
6. The granting of the deviation is consistent with the intent and purpose of this ordinance and the comprehensive plan.

Comments:

The applicant has requested a deviation from development standards to reduce the required minimum lot size from 0.50 acres to 0.25 acres. The applicant's request for this deviation is considered in conjunction with this application, but requires separate findings, recommendation, and motion by the Board of County Commissioners (BCC). Unless the applicant receives approval of the deviation, the site and development plan shall be revised to demonstrate compliance with the 0.50 acre minimum lot size requirement. The BCC is obligated to review the deviation requests accompanying site and development plan applications. The BCC may approve the request only after finding that the request satisfies the criteria of Section 10-1.106 of the LDC.

It should be noted that deviations to a lot size within a conservation subdivision has only occurred only one other time, in the Talquin Meadows Conservation Subdivision application. In that application, a deviation was granted to only a small percentage of the total lots (26%) in the development and for only a 37.5% decrease in the minimum required lot size. The proposed Chason Woods application requests a deviation to ~~89%~~ of the total lots and requests a ~~50%~~ reduction in lot size. Any recommendation regarding the deviation proposed for the Chason Woods application should be able to be defensible on the precedence of the Talquin Meadows deviation. Please also refer to the comments from Adam Biblo in the memorandum dated October 13, 2009 (see attachment #1).

Deficiencies:

- a) The applicant shall receive approval of the deviation request prior to finding the application complete. Should the deviation not be approved, the site and development plan shall be revised to comply with the 0.50 acre minimum required lot size. Should the BCC find that the request does not satisfy Section 10-1.106, then the application would be presumed not to comply with that Section of the LDC which the applicant sought to deviate.*

Deficiencies and Issues for the Applicant to Address in the Site and Development Plan:

*Due to the number of outstanding deficiencies, staff will require a 2nd Technical Staff Meeting.

1. **Minimum lot size requirement.** The application proposes to develop the site with a majority of the lots comprising no less than 0.25 acres (*although, according to the site plan on Sheet 4.8, several lots appear to contain less than 0.25 acres*). The minimum lot size in a conservation subdivision shall consist of no less than 0.5 acres. The application includes a request for a deviation from development standards to reduce the required minimum lot size from 0.5 acres to 0.25 acres in order to attain the maximum allowed density on the subject site. Please refer to Finding #4, which pertains to the UF conservation subdivision regulations and Finding #13, which pertains to deviations. Please also refer to the additional comments in Attachment #1.
2. **Concurrency.** The application shall demonstrate compliance with concurrency requirements of the Land Development Code (Article III of the LDC). No final development order can be issued unless there is sufficient, available capacity to meet the level of service standards for the existing population, vested development, and for the proposed development. Also, a final development order and final certificate of concurrency cannot be issued without documentation from the Leon County School Board that school concurrency has been satisfied. Please contact Ryan Guffey, Concurrency Management, at 850-606-1300. Please also refer to Finding #2 and attachment #6.
3. **Environmental analysis.** A Natural Features Inventory (NFI) must be completed and approved by the Environmental Compliance Division prior to submission for Technical Review meeting on this site and development plan. Please include with your formal submission for Type "C" review a copy of your NFI approval letter, and a completed application for an Environmental Impact Analysis. The site and development plan must clearly indicate significant environmental features or constraints located on or adjacent to the subject property and ensure that the proposed site and development plan accommodates these features. Please refer to Finding #'s 3, 5, 6 and 9 of this report. (Also see attachment #3)
4. **Woodville karst plain.** The site and development plan shall mitigate potential adverse impacts to the ground water system and Floridan Aquifer. 1) The subject site is located in the Woodville Karst Plain. 2) Areas in the Woodville Karst Plain are identified as having soils that are well-drained and a permeable underlying geology that would make the underlying aquifer more vulnerable to contamination¹. The subject site is located in an area that has a high concentration of Karst features; areas with high concentrations of Karst features likely contain significantly more conduits connecting surface features to the ground water than does areas of low concentration, making the area more susceptible to adverse groundwater impact resulting from development². 3) The subject site is in the Lake Munson drainage basin, a creek-drained basin with swallow holes; swallow holes (stream sinks) directly or indirectly recharge the Floridan aquifer, increasing the potential for adverse impact to ground water (and aquifer) from development impacts². 4) The subject site is located in an area where the overburden, sediments above the aquifer providing a buffer between the land surface and the aquifer is minimal – with a thickness of only five to thirty feet². 5) Recharge rates to the aquifer are high in the location of the subject site due to the Karst geology (St. Marks Formation [limestone]) and lack of a confining layer of low-permeability sediments³. 6) The Woodville Karst Plain exhibits a significant degree of interconnection between the land surface and the aquifer, with active sinkholes having a direct connection²; pollutants, conveyed into active sinkholes, either through surface runoff or groundwater travel, can be conveyed directly to the aquifer with little or no biodegradation.

The applicant shall incorporate Best Management Practices (BMPs) that might help to significantly reduce the amount of pollutants as the result of development impacts that may be introduced to the

groundwater. Concerted efforts such as the exclusive use of xeriscape plants, vegetative buffers around ESAs, forbiddance of fertilizers, decreased front yard setbacks (to reduce additional impervious surface areas associated with driveways), more frequent and therefore more shallow stormwater management facilities, rain gardens, two-story dwelling units that reduce the overall building footprints, as well as, limits of clearing for each individual lot to reduce disturbance of natural vegetation can be implemented in the HOA documents. Refer to the Best Management Practices of § 10-4.384 of the LDC provided in below. The applicant shall demonstrate that the maximum percent of impervious area is in compliance with the minimum development standards of the Urban Fringe zoning district (Section 10-6.613). The site and development plan shall be revised to tabulate the square feet of impervious and their percentages. Also, refer to comments and/or findings from the Environmental Compliance Division in attachment #3.

5. **Best management practices.** According to §10-4.384 of the LDC, Best Management Practices (BMPs) for conservation and preservation areas shall be used in conjunction with all new development and all redevelopment in areas within designated canopy road corridors or within 25 feet of any floodplain, floodway, wetland, waterbody, natural watercourse, high quality successional forest, native forest, active karst feature, habitat area of any endangered, threatened, or special concern species, or any other environmentally sensitive area as identified in the Tallahassee-Leon County Comprehensive Plan, conservation element. The BMPs for these areas are as follows:
- a) Buffering, which may include vegetated berms along the lower contours of lots, so as to provide or improve wildlife habitat and to improve water quality. Berms or buffers shall be vegetated with natural indigenous vegetation suitable for soil and hydrology of the site.
 - b) Restricted use of pesticides, herbicides, and fertilizers to those materials which have rapid decomposition characteristics, are labeled for aquatic use, and are used at the lowest possible label rates. Fertilizer constituents should have at least 50 percent slow release characteristics, be applied at the lowest labeled rate per application, be a non-phosphorous or low phosphorous analysis, and be formulated for good slope retention characteristics.
 - c) Preservation or revegetation of natural wetlands, floodways and watercourses.
 - d) Use of native, low-fertilization, and low-maintenance vegetation.
 - e) Regular maintenance and upgrading, as necessary, of septic tanks and approved discharges from washing machines and garbage disposals.
 - f) Soil conservation service approved conservation practices, including erosion and sediment control and water quality practices for all agricultural operations.

In recognition of the conservation/preservation areas identified on-site as well as, the close proximity to Wakulla Springs, the site and development plan shall be revised to include BMPs that comply with the criteria above.

6. **Reserve area easement.** The application shall include documentation which identifies the entity (i.e. local government or land trust that qualifies as a 501(c)(3) organization), of which will be responsible for monitoring and managing the reserve area easement. The application currently indicates that the conservation area (reserve area) will be dedicated to Leon County and will be owned and maintained by a Homeowner's Association (HOA). If the easement is dedicated to Leon County, the county must accept the easement. Additionally, if the easement is to be maintained by the HOA, the HOA shall qualify as a 501(c)(3) organization. Please refer to Finding #'s 4 and 6 of this report.

7. **Workforce housing.** Documentation in the site and development plan application indicates that 15% of the proposed residential lots will be set aside as affordable workforce housing. The site and development plan shall be revised to identify those lots that will be developed as affordable workforce housing. In addition, the site and development plan application shall include documentation which identifies the entity responsible for monitoring the development of the affordable workforce housing lots and determining the eligibility criteria for potential buyers and future sales and transfers. The site plan proposes 523 total residential lots; therefore, 78 lots shall be designated as being sold as affordable workforce housing units. Please refer to Finding #11 of this report. Please also refer to the additional staff comments in attachment #1.
8. **Minor collector roadway.** Based on the current design of the site, staff has determined that the east-west roadway that traverses the site may require designation as a minor collector roadway. Please also refer to Finding #8.
9. **Consistency with the Comprehensive Plan.** The application shall provide documentation from the Tallahassee/Leon County Planning Department that the proposed use is consistent with the Comprehensive Plan. Refer to attachment #2 from the Planning Department.
10. **Compliance with applicable standards from Public Works.** The application shall be revised to provide documentation demonstrating that the application has satisfied the applicable standards identified by Leon County Public Works. See attachment #4 from Public Works.
11. **Compliance with applicable standards from the Tallahassee Fire Department.** The application shall be revised to demonstrate compliance with the deficiencies noted by the Tallahassee Fire Department. See attachment #5 from the Fire Department.
12. **Utility concept plan.** The applicant shall provide documentation, from the utility provider, of an approved utility concept plan prior to final site and development plan approval.
13. **Development requiring platting.** The proposed subdivision will require platting, in accordance with Section 10-7.203 and Section 10-7.601 of the LDC. The platting process can add up to six additional weeks to the development schedule. No building permits shall be issued for a project that requires a plat until the plat has been accepted by the Board of County Commissioners and recorded in the plat books of the county.

Report Notes:

- 1) Based on Southern Leon County Environmental Features Assessment (SLCEFA); Hartsfield, et al; Leon County, undated (circa 2000);
- 2) Based on Characterization of Karst Development in Leon County, Florida, for the Delineation of Wellhead Protection Areas; Benoit, Johnson, Rains, Songer, and O'Rourke; NWFMD, 1992;
- 3) Based on Hydrogeologic Investigation and Simulation of Ground-Water Flow in the Upper Floridan Aquifer of North-Central Florida and Southwestern Georgia and Delineation of Contributing Areas for Selected City of Tallahassee, Florida, Water-Supply Wells; Davis; USGS, 1996;
- 4) Memorandum from Alex Mahon, State of Florida Environmental Health Department, April 27, 2005

NOTE: The purpose of this document is to provide preliminary information regarding the procedural and substantive standards of the Leon County Land Development Code and direct the applicant to relevant sections of the code and comprehensive plan that will be necessary to properly design the project. In that

respect, this memorandum should not be considered to be a complete analysis of all potential site design issues.

The comments made in this memorandum are based on the information submitted by the applicant for pre-application review. Additional comments may be applicable if additional or more specific information is presented at the time the application is formally submitted. If any comment presented in this memorandum is unclear, or for additional information, contact Ryan Culpepper of Development Services at (850) 606-1300 or email culpepperr@leoncountyfl.gov prior to submitting a formal application.

Attachments

1. October 13, 2009, memorandum from Adam Biblo, Development Services
2. October 14, 2009, memorandum from Zach Galloway, Tallahassee/Leon County Planning
3. October 14, 2009, memorandum from Charley Schwartz, Environmental Compliance
4. October 14, 2009, memorandum from Kimberly Wood, Leon County Public Works
5. October 14, 2009, memorandum from Maurice Majszak, Tallahassee Fire Department
6. October 14, 2009, Preliminary Certificate of Concurrency and Notice of Intent to Negotiate a Concurrency Agreement
7. October 12, 2009, letter from the Friends of Wakulla Springs State Park, Inc.
8. October 13, 2009, letter from the Wakulla Watershed Coalition

BOARD OF COUNTY COMMISSIONERS
INTER-OFFICE MEMORANDUM

Date: October 13, 2009
To: Ryan Culpepper, Development Services Administrator
From: Adam Antony Biblo, AICP, ULI 
Director, Development Services Division
Subject: **Chason Woods Type C site and development application**
Technical Coordinating Review Issues

In response to the proposed application, I submit to you the following issues which I believe are raised by the subject application and which should be satisfactorily addressed prior to garnering our support for recommending approval.

1) The application proposes a development of over 500 houses located a significant driving distance from employment centers, shopping opportunities, schools, and other public facilities. It will be approximately 4 miles from the center of the Woodville community, 10 miles from downtown Tallahassee, and 11 miles to Crawfordville, Fl. Consequently, the associated generation of vehicle miles traveled for this development will likely be significantly greater than were it a comparable sized development within the urban services area.

In comparison, the proposed Southside DRI will have approximately 3,000 dwelling units with much shorter trips to employment centers (2.25 miles to the CCOC and 5 miles to downtown Tallahassee), will contain a significant number of shopping opportunities and facilities within or close by, and will have access to transit; therefore, it is possible that although the Southside DRI will have approximately 6 times the number of residents, the associated aggregate VMT will be within the same level of magnitude as that of Chason Woods. Therefore, it would appear that Chason Woods would contribute a significant volume of air pollution, including greenhouse gasses, when compared to similar and larger sized developments located within the urban services area.

It is my understanding that the proposed development will also require the removal of a large quantity of vegetation, to accommodate the homesites, streets, and other attendant infrastructure. This vegetation presently serves to remove carbon dioxide (a greenhouse gas) from the atmosphere ("carbon sequestration"). Therefore, the proposed development presents two challenges to the County's air quality.

These air quality impacts raise issues of compliance with the following regulations set out in the Land Development Code:

Section 10-4.104, Objectives (related to Environmental Management) – Subsection (1) part b., to wit:

This article is intended to protect, maintain, and enhance both the immediate and long-term health, safety, and general welfare of the residents of the county. The following objectives support this purpose by encouraging productive and enjoyable harmony between humanity and nature. The objectives are listed according to their primary purpose, but many objectives also relate to and support other purposes of the article.

(1) Overall

b. To protect natural systems and avoid impairment of their beneficial function.

Section 10-7.104, Purposes (of subdivision and site and development plan regulations), subsections (1), (6), and (7), to wit:

The purposes of this article are to:

- (1) Protect and provide for the public health, safety, and general welfare of the residents of the county.*
- (6) Provide for coordination between review of development and subdivision proposals with Articles III and IV and other applicable county requirements.*
- (7) Provide for adequate light, air, and privacy, to secure safety from fire, flood, and other danger, and to prevent overcrowding of the land and undue congestion of population.*

And, Section 10-7.505, General Principles of Design Relating to Impacts on Nearby Streets and Property Owners, subsection (2), to wit:

(2) Minimize adverse environmental impacts both on-site and off-site;

2) The application represents the extension of central sanitary sewer and central potable water infrastructure several miles beyond their current termini, to a remote location outside of the urban services area, while other portions of the urban services area are not presently served by such infrastructure and can not sustain urban-intensity development. This extension of infrastructure will produce a classic pattern of leap-frog, sprawl development. Accordingly, it would appear to conflict with the following regulations relating to the orderly, efficient, progression of growth and extension of infrastructure:

Section 10-6.613 Urban Fringe zoning district (excerpt), to wit:

The UF zoning district is intended to provide for low-intensity development that can be accommodated without a full complement of urban services and infrastructure.

Section 10-7.104, Purposes (of subdivision and site and development plan regulations), subsections (8), (10), to wit:

The purposes of this article are to:

- (8) Encourage the orderly and beneficial development of all unincorporated parts of the county.*
- (10) Guide public policy and private action in order to provide adequate and efficient transportation, water, sewerage, schools, parks, playgrounds, recreation and other public facilities and services.*

Section 10-7.501, Substantive Standards and Criteria, Generally, subsection (e) part (1), to wit:

- (e) No development shall be approved unless it has been designed so as to reasonably achieve the following:*
 - (1) The adequate and efficient supply of utilities and services to new land developments.*

And, Section 10-7.524, Public Sanitary Sewer or On-site Sewage Disposal Systems., subsection (b), to wit:

(b) Needed sanitary sewer facilities will be provided in a manner which promotes orderly, compact urban and cost efficient growth while optimizing the use of existing facilities.

3) The application would constitute a Development of Regional Impact (DRI) except that the applicant has represented to DCA that the development will provide workforce housing consistent with the requirements and guidelines for workforce affordable housing, as promulgated under HB 1363. This bill requires at least 15% of the total residential dwelling units to be dedicated to affordable workforce housing. The materials submitted for review provide no indication as to how the developer intends to facilitate compliance with this standard: the site and development plan does not provide estimated sales prices, or address any mechanisms that will be utilized to ensure recipients of the workforce housing units will be within eligible income levels and that units will remain affordable over time.

Should the application not be revised to address this issue, I would ask you to verify DCA's position that the proposed development does not represent a Development of Regional Impact and to recalibrate review processes as necessary, according to their answer.

4) Lastly, it comes to my attention that we have previously granted deviations to lot size requirements for conservation subdivision applications, and this occurred only once, for the Talquin Meadows application. For that application, we granted that deviation for 26% of the number of lots proposed; the deviation provided a 37.5% reduction in lot size for those lots. Any recommendation regarding the deviation proposed for the Chason Woods application should be able to be defensible on the precedence of the Talquin Meadows deviation.

cc: TCC staff
Record File



Tallahassee-Leon County
Planning Department

MEMORANDUM

TO: Ryan Culpepper, Leon County Development Services
FROM: Zach Galloway, Senior Planner, TLCPD
DATE: October 12, 2009
SUBJECT: October 14, 2009: Technical Review – Chason Woods

APPLICANT: J&T, LLC
AGENT: Moore Bass Consulting, Inc
PARCEL ID: 46-13-20-403-0000
FUTURE LAND USE: Urban Fringe (UF) & Government Operational (IG)
ZONING: Urban Fringe (UF)

Findings:

- 1) The project is a proposed 523-unit residential conservation subdivision on 697 acres. The property is located on the east side of Wakulla Springs Road, approximately one-half mile south of Oak Ridge Road, and bordered on the south by County Line Road (Wakulla County).
- 2) The proposed project is located in the Wakulla Springs Primary Springs Protection Zone (PSPZ) and shall adhere to the requirements of Land Use Policy 2.2.2, which limits development types to conventional 3-acre lots or conservation subdivisions.
 - The code requires ½-acre lots in Urban Fringe conservation subdivisions; however, the Comprehensive Plan does not address lot size.
- 3) Utilities Element, Policy 1.2.1 (SS) limits lot sizes to ½-acre where sewer is not available.
- 4) Pursuant to Potable Water Policy 1.2.1 and Sanitary Sewer Policy 1.3.3, the applicant shall demonstrate that “at the time a development permit is issued, adequate facility capacity is available or will be available when needed to serve the development; or at the time a development order is issued, the necessary facilities and services are guaranteed in an enforceable development agreement.”
 - The Applicant has provided materials from the City of Tallahassee Water Resources Engineering that indicate the utility provider’s ability to serve the subject site. The letter includes an attachment of an acceptable conceptual route and infrastructure capacity needed to serve Woodville Rural Community. No formal agreement has been reached, and significant design and construction details must be finalized.
 - The applicant must validate their ability and intent to extend master planned sewer, as noted in the attachment of letter dated 9-21-09, to Woodville and the subject site prior to final site plan approval. This can be accomplished through a bond, letter of agreement, or other vehicle acceptable to the City of Tallahassee Utilities.
- 5) Land Use Policy 2.3.8 states that the open space component of Conservation Subdivisions shall be “placed under a permanent easement that runs with the land. Said easement may be assigned to (1) local government or (2) a local or national land trust that is a 501(c)(3) organization for which conservation of resources is a

principal goal and which can provide reasonable assurance it has financial and staff resources to monitor and manage the easement in accordance with the intent of the Objective 2.2 [L] and its supporting policies.”

- The applicant must provide documentation exhibiting compliance with the stated policy.

- 6) A revision to the Sanitary Sewer sub-element occurred in the second cycle of the 2006 Comprehensive Plan Amendments. The result of the amendment is found in Policy 1.3.1 [SS] of the Tallahassee-Leon County Comprehensive Plan, which states, “for areas lying outside the Urban Service Area and within the Urban Fringe...central sanitary sewer service may be extended and/or provided by an existing utility provider.” The extension must serve a conservation or clustered subdivision.

This provision is not without limitations, and later statements within the same Policy 1.3.1 qualify the extension to Urban Fringe areas.

- a) The policy requires “[a]ll costs of sewer line extensions, any necessary lift stations and on-site sewer infrastructure shall be borne by the developer as specified within the adopted *Water and Sewer Agreement* and shall be constructed to the standards specified within the *Agreement*.”
- b) Where the City of Tallahassee is the service provider other issues should be considered. “The City Manager and the County Administrator or their designees may agree that the connection of a development to central sewer is not economically feasible and may deny such requests to connect. Such cases may arise when considering lower density isolated developments, developments located in areas that are not environmentally sensitive, or developments that are not within a reasonable distance to existing infrastructure.
- c) The numerous active karst features of this area – and their connections to groundwater and area springs – are a major impetus for sewer extension into Urban Fringe areas. “The City of Tallahassee shall place a higher priority upon serving areas that...may be determined to negatively impact the environmental quality of Wakulla Springs if developed with traditional septic tank systems.”

- 7) As per the requirements of Florida Statute 380.0651(3)(j), in order to increase the DRI thresholds “by 50 percent...the developer demonstrates that at least 15 percent of the total residential dwelling units authorized within the development of regional impact will be dedicated to affordable workforce housing, subject to a recorded land use restriction that shall be for a period of not less than 20 years and that includes resale provisions to ensure long-term affordability for income-eligible homeowners and renters and provisions for the workforce housing to be commenced prior to the completion of 50 percent of the market rate dwelling[s].”

- Based on this language, 78 of the 523 housing units must be (1) sold at the State-defined “workforce” price, (2) sold to income qualified individuals/households, and (3) maintain affordability for at least 20-years.
- Provide documentation that ensures compliance with the Statute. Without proper documentation, the site plan, which exceeds the Wakulla County 500 unit DRI threshold – must be reviewed as a DRI.

- 8) The Tallahassee-Leon County Greenways Master Plan designates utility easements as ideal locations for dual functionality – electric transmission and bicycle travel routes. The applicant has provided a trail easement the full length of the transmission line that bisects the property.

- 9) New Comprehensive Plan, Conservation Element policies call for the creation of land development regulations that require the use of low impact development (LID) techniques within the PSPZ. While not currently required, Planning recommends using LID treatments for stormwater treatment.

- The shared driveways, driveway strip paving, and narrow roadway cross sections are consistent with LID principles.

- 10) Sunflower Road is designated as a minor collector in the Comprehensive Plan, Transportation Element. An existing easement travels across the site and was intended for future extension of Sunflower Road to act as an east-west connector. Several aspects of County policy language and code requirements reflect intent to provide adequate transportation infrastructure and capacity to avoid congestion. These passages include Transportation Policy 1.6.9 and 1.6.10, as well as Section 10-7.501(e)(2) and (3) and 10-7.502(a)(2) of the

Land Development Code. Specifically, Policy 1.6.10 directs development to, "incorporate and continue all sub-arterial streets stubbed to the boundary of the development plan by...existing development." The Sunflower Road access easement runs across the subject site.

- Per Comp Plan policy direction, Planning Department recommends a redesign of the site plan to formalize Sunflower Road by extending it through the site and ensuring it functions as a minor collector.

Leon County, Department of Growth & Environmental Management

MEMORANDUM

TO: Ryan Culpepper
Development Services Administrator

FROM: Charley M. Schwartz, P.E. *CMS*
Senior Environmental Engineer

DATE: October 14, 2009

RE: **Chason Woods Conservation Subdivision
Technical Review Meeting October 14, 2009
Parcel ID: 46-13-20-403-0000**

I have conducted a review of the referenced project for its consistency with environmental and stormwater requirements found in Section 10 of the Leon County Land Development Code (LDC). Recommendations, Comments, and Information necessary for the review process include, but are not limited to, the subsequent. All other requirements of the code, although not mentioned hereon, are still applicable.

Environmental Review Processes:

- A NFI application was approved with conditions on October 8th, 2009 (LEA09-0035).
- An Environmental Impact Analysis (EIA) is required for this project. An EIA was submitted on September 23rd, 2009 (LEA09-0047). A Request for Additional Information (RAI) was issued on October 14th, 2009. The items within the RAI are essentially contained within this memo below.
- An Environmental Management Permit (EMP) is required for this project.
- An as Built and an Operating Permit are also required.

Project construction cannot commence until all permits are issued.

Recommendations, Comments, and Required Information:

The comments are in general "big ticket" items which must be resolved before a detailed analysis of stormwater calculations and plan sheets can be completed.

STORMWATER COMMENTS

1. **Volumetric Decrease in Stormwater Runoff:** The conclusion that the project will provide a volumetric decrease in stormwater runoff from the development area is not accurate and therefore not acceptable.
2. **Discharge Conveyances:** The applicant has not demonstrated that an adequate conveyance is present to receive stormwater discharged from proposed SWMFs G, H, I, J and K [Ref. LDC Sec. 10-4.301(6)]. If there is no adequate conveyance (including easement) full retention of stormwater for all events up to and including the 100-yr, 24-hr storm is required. If off-site easements are obtained the applicant will need to demonstrate that no off-site impact will occur consistent with LDC Sec. 10-4.302(2).
3. **Discharge to Depressions:** Any discharge to an active karst feature must comply with LDC Sec. 10-4.301(7) (discharge must meet drinking water standards). SWMFs shall not be placed on top of active karst features. All potential karst features on the site are assumed to be "active" unless investigated and determined to be "inactive". All depressions receiving discharge from proposed Stormwater Management Facilities (SWMFs) have not been adequately investigated.

4. **Discharge to Wetlands:** The applicant shall demonstrate that proposed discharges to any wetland do not adversely impact the existing topography and hydrocycle of the wetland consistent with LDC Sec. 10-4.202, 10-4.322 and 10-4.327(3). Unless stormwater analysis shows significant correlation between pre and post development discharge rates, durations and volumes to the wetlands, a wetland biologist (or comparable professional) shall provide documentation and analysis that the wetlands will not be adversely impacted by changes in stormwater discharge characteristics.
5. **Lot to Lot Drainage:** Lot to lot drainage shall be addressed, at least in concept, prior to environmental permitting. It appears the shared driveways could be readily designed to carry stormwater flow and be covered with drainage easements.
6. **Geotechnical Investigation for Retention SWMFs:** A detailed review of supporting geotechnical analysis for retention facilities was not completed since the size and configuration of the facilities may change (reference the adequate conveyance issue identified above). Ensure that geotechnical information consistent with LDC Sec. 10-4.303(14) is provided to support proposed retention facilities.
7. **Stormwater Report:** As was discussed in phone conversations with Mr. David Thornton (Moore Bass) the stormwater report will need to address how starting water elevations within the on-site depressions were established for modeling analysis. It is suggested that County Environmental staff be contacted regarding the starting elevations prior to conducting significant modeling work. The peaking factor of 484 appears to be too high for estimating runoff from the existing conditions at the site. The CN of 40 for pre-development woods in "fair" condition appears high. Indicate why "fair" as opposed to "good" condition woods has been selected and why a CN value between "fair" and "poor" is used. Ensure post development CN values are consistent with proposed post-development soil conditions (ex. CN value may differ in areas with mass grading).
8. **Additional Stormwater Review Entities:** Please be advised that the design of the SWMFs will need to be approved by the Public Works Department (since identified as a Public Subdivision) and the NWFWMMD.

GOPHER TORTOISE COMMENTS

9. **Suitability Analysis:** A Habitat Suitability Analysis (Existing Conditions) was provided as required by the Natural Features Inventory (NFI) conditional approval (LEA 09-0035). This analysis described the habitat quality as being either good, medium, or low. Although the description of the soils and vegetation in the good quality habitat of the Development Area was similar to the Florida Fish and Wildlife Conservation Commission's (FWC) description of Acceptable or Desirable Habitat, the estimated tortoise population sizes and densities in the Development Area do not indicate a long-term functional population. Nevertheless, 643.58 acres of the overall property do currently provide habitat for an estimated 80 gopher tortoises and therefore, the Existing Conditions Sheet 3.1 and the Preliminary Plat Sheet 4.0 must indicate the limits of the habitat located on-site.
10. **Recipient Site Area:** The site plan must show the limits of the proposed recipient site and be clearly labeled as such.
11. **Tortoise Relocation:** The current proposal is to relocate an estimated 37 tortoises into an on-site recipient area. If a permit cannot be obtained from FWC to use the proposed recipient site, an alternative plan or recipient site will be needed. A general alternate plan should be provided. If a different recipient site is proposed, it must be one which is approved by FWC and is located within Leon County.
12. **Conservation Easement Area:** The Preliminary Plat Sheet 4.0 indicates that the Conservation Easement will be dedicated to Leon County and owned and maintained by the H.O.A. The easement area will be required to be dedicated to FWC as well and must be noted. It also needs to be clarified that the H.O.A. will be the Designated Responsible Management Entity (responsible for funding and implementation of the Plan). The specific land management company needs to be determined and provided as soon as possible.

REMAINING COMMENTS

13. **Black Bears:** The Florida black bear is listed as a threatened species by the FWC. Data provided during the NFI from the Florida Natural Areas Inventory identifies black bear occurrences adjacent to the parcel and within a 1 mile radius of the parcel. Furthermore, this area is identified by FWC as prime black bear habitat. The applicant must address issues of road related hazards with black bears and other conflicts that might occur between residents of the subdivision and black bears that may be using the habitats on-site.
14. **HOA Covenants and Restrictions:** The submitted materials reference reliance upon HOA Covenants and Restrictions for maintenance and operation of a series of passive stormwater Best Management Practices on the site. Provide a draft copy of the HOA Covenants and Restrictions.
15. **Easement Documents:** Provide draft copies of all easement documents including but not necessarily limited to cemetery access, cemetery protection, emergency access and Vegetated Natural Buffer easements.
16. **Passive Recreational Areas in Conservation Easements:** The submitted materials indicate that the applicant may intend to use the conservation easement areas as passive recreational areas. The scope of passive recreation needs to be addressed within the draft conservation easement documents and proposed operation and maintenance activities outlined.
17. **Sewer:** As stated previously, **any EMP reliant on sewer will not be issued until sewer service is actually available to the development.** In your response to the Pre-Application comments, you indicated the desire to bond the off-site utility improvements and commence on-site and off-site work simultaneously. Given the substantial amount of off-site utility work required, simply bonding the improvements will not be sufficient to allow construction on the site to commence.
18. **Phasing:** More detail regarding proposed phasing of the development is required.
19. **Site Plan / EIA Plan Sheet Comments:**
 - i. Sheet 1.0: The property owner shall be identified.
 - ii. Sheet 2.0: The "Preserved Native Vegetation / Natural Area" shown in the Typical Lot Layouts is not consistent with supplied narrative descriptions of these areas. Unless existing vegetation in the areas is to be formally protected and encumbered by binding legal obligations they should not be identified as "Preserved."
 - iii. Sheet 4.0: Identify the Gopher Tortoise Management Plan easement areas and identify a suitable third party entity that will own and maintain the area (not the County). More detail regarding proposed phasing of the development is required (schedule, activities within phases, etc.). Show easement areas for Vegetated Natural Buffers (VNBs). Document that the relatively narrow 10' HOA access easements to isolated HOA open space will be adequate (what type of activities in open space areas, what type of equipment needed to maintain areas).
 - iv. Sheet 4.6: Ensure legal access is provided to all conservation easement areas (note easement at top of sheet accessible by HOA but not necessarily County staff).
 - v. Sheet 6.3: Provide a pop-off drainage conveyance beneath Chason Marsh Drive to ensure that the confined floodplain area can drain to the larger floodplain areas to the west if needed.
 - vi. Sheet 6.4: There are several areas where additional grading and/or drainage improvements need to be provided to prevent flooding on proposed parcels (ex. Block "G" Lots 3, 4 & 5; Block "H" Lots 1 & 2, Block "AA" & "BB" ...). The perimeter access drive around SWMF E appears to impound water on several lots within Block "L".
 - vii. Sheet 6.5: VNBs shall be provided downslope of improvement areas where stormwater runoff can not be routed to the SWMFs (ex. Block "T" Lots 9-12, Block "K", Block "Y").
 - viii. Sheet 6.8: Verify the fill on Block "Y" is necessary (can lots be served by VNBs or backlot swales/berms?).

- ix. Sheet 7.0: We typically do not review utility conflicts (storm vs sanitary sewer) until EMP. Improvements within existing easements (ex. Electric Transmission Line) will also need to be approved by the easement holder.

General Comments:

Environmental Compliance Division Recommends a 2nd Technical Review.

It should be noted that non-inclusion in this letter of a Leon County Land Development Regulation\Requirement does not constitute exemption from compliance with the requirement.

BOARD OF COUNTY COMMISSIONERS
MEMORANDUM

DATE: October 13, 2009
TO: Ryan Culpepper, Development Services Administrator
FROM: Kimberly A. Wood, P.E., Chief of Engineering Coordination
SUBJECT: Type D Review of Chason Woods Subdivision for October 14, 2009, Technical Review Meeting

The information submitted for review is no longer valid, since the agent notified staff that they would be seeking to change from a cluster subdivision to a conservation subdivision; Therefore, the comments below are general comments for the applicant's information and will be revised as more information becomes available.

1. The details sheet must include typical section representing each proposed typical, including right of way widths and utility easements. In addition, any travel proposed in excess of County standard 10 foot must include a justification for the increase. Any increase in travel lane must be approved by the County Engineer and if approved the right of way must be increased to accommodate utilities in their proper corridor. There appear to be several roads in the Geometry Plans shown with 2 – 11' lanes, while there is not typical that would allow the 11' travel lanes and the r/w has not been adjusted accordingly.
2. The proposed lot layout needs to identify the proposed materials for driveways. If the applicant is proposed shared driveways as indicated in the smaller lot layout, there must be a shared access easement, with appropriate dedication information and maintenance responsibilities addressed.
3. Since this is to be a platted subdivision the plans must include preliminary plat with conventional information required for platting, including but not limited to:
 - a. Dedication information must be provided for easements, common areas, row, etc.
 - b. Limits of easements must be clearly delineated.
4. Plans must be revised to clearly demonstrate that access easements are removed from conservation easements, no overlapping.
5. Phasing lines must be clearly delineated on all sheets to ensure that the appropriate infrastructure is built to support each phase. Plans should also include a phasing schedule.
6. The applicant will need to provide documentation that the City of Tallahassee Electrical Section will permit the construction within their utility easement.
7. Plans must be revised such that all proposed sidewalks are connected, dimensioned, and noted to be built to FDOT and ADA standards.
8. Plans must be revised to include more information on all SWMFs including but not limited to, discharge points, conveyance systems to facilities, limits of the facility including appropriate dimensions of maintenance berms, graded and stabilized access points to facilities, including the toe of any berms and outfall structures, turning movement or turn arounds where needed, how off-site water will be addressed through the site, etc. Note all conveyance systems and SWMF must be located in a properly dedicated drainage easement if not located in r/w.
9. Privately maintained SWMFs are required to meet County Standards, therefore there is no reason to have SWMFs dedicated to the HOA. SWMFs shown as maintained by HOA adjacent to the power line easement must be designed to meet County standards.
10. Plans must be revised to include proposed conveyances within 30 foot drainage easements dedicated to Leon County. Improvements should be offset within the easement to allow maintenance access. Notes prohibiting improvements within drainage easements limiting access and/or function must be included on the plans.

11. SWMFs should be exclusive of existing floodplains, which could be potentially active karst features, or if inactive, any excavation associated with the SWMFs could potentially reactivate them.
12. Signs and other improvements can not interfere with existing "Ingress/Egress" easements parallel to Countyline Road.
13. Covered bus shelters can not be located within proposed public right of way.
14. The proposed typical lot layouts include notations that the rear property will be preserved native vegetation/natural areas, is this required? If so, will these areas need to be included as easements?
15. Provide more information on adjacent properties within 300 feet of all proposed connections, including but not limited to driveways, sidestreets, etc. Show site triangle for the proposed drive. Permits needed from Wakulla County and Leon County, Driveway Connection, and possibly Utility permits.



**TALLAHASSEE FIRE DEPARTMENT
SITE PLAN REQUIREMENTS**

Project Name: Chason Woods Conservation Subdivision
Parcel ID # 46-13-20-403-000-0
LSP090035
AGENT: Moore Bass Consulting, Inc.
PLANNER: Ryan Culpepper
MEETING DATE: October 14, 2009

Located at the east side of Wakulla Springs Road, approximately one-half mile south of Oak Ridge Road, and bordered on the south by County Line Road, the proposed project is for 523 single family residential lots.

The previous submittal stated that there would be a small neighborhood commercial component and I asked for the location to be identified on the plans. Has the commercial component been reconsidered? It is not called out on the plans.

Listed below are the Tallahassee Fire Department's requirements concerning the above proposed development. The agent or owner prior to approval shall address the items checked. Comment numbers are not sequential as only those comments pertinent to this project are provided.

- X 6. Every building constructed shall be accessible to fire department apparatus by way of access roadways with all-weather driving surface of not less than 20 feet of unobstructed width, with adequate roadway turning radius capable of supporting the imposed loads of fire apparatus (32 tons) and having a minimum clearance of 13 feet, 6 inches. Slope approach angle 15 degrees, departure angle 9 degrees. Please use auto-turn software (BUS-40) throughout site to show turning radii.
Entrance shown on sheet 5.3 does not meet above stated code requirement.

Maurice Majszak
Tallahassee Fire Department
Senior Plans Examiner
327 N. Adams St
Tallahassee Fl 32301
(850)891-7179
Maurice.Majszak@talgov.com

Certificate Number: LCM090019
Date Issued: 10/14/2009
Expiration Date: 01/14/2010

Attachment # 6
Page 1 of 2

LEON COUNTY
PRELIMINARY CERTIFICATE OF CONCURRENCY

Applicant.....: MOORE BASS CONSULTING, INC
Owner.....: J & T LLC
Project Name....: CHASON WOODS SUBDIVISION
Project Location: SUNFLOWER
Current Zoning: URBAN FRINGE
Future Use Description: URBAN FRINGE
Parcel I.D. Number(s) 46-13-20-403-0000

Type of Land Use:
Residential Single Family - Deta 523 Units

Conditions:

This Preliminary Certificate of Concurrence is issued pursuant to Article VI of Chapter 10 of Leon County Code of Laws. Based upon the information submitted by the applicant, this certificate certifies that a development with the land use densities and intensities specified at the location specified above will have adequate infrastructure capacity tentatively reserved for water, wastewater, solid waste, recreation, mass transit, stormwater and transportation to serve the needs of the development. School capacity is not reserved at the time of the issuance of a Preliminary Certificate of Concurrence. Concurrence applicants for residential development after June 6, 2008 are required to provide proof from the Leon County School Board that school concurrency has been satisfactorily addressed.

The information provided by the applicant has not been verified as accurate by staff. Upon notification from the Development Services Division that a complete application for a Development Order is received from the applicant, staff will begin the assessment of the information received from the applicant. This permit in no way gives the proposed development any final authorization to develop, nor does it absolve the applicant from fulfilling the requirements of any Federal, State, County, or City Laws or regulations related to land use or land development.

Ryan Guffey, AICP
Development Review and
Inspection Division

10-14-09
Date



Leon County Growth and Environmental Management
3401 West Tharpe Street
Tallahassee, Florida 32303
(850) 488-9300

NOTICE OF INTENT TO NEGOTIATE A CONCURRENCY AGREEMENT

I, Tom Gould, the undersigned owner of the Chason Woods development project submitted an Application for Concurrency Determination on August 5, 2009 to the Leon County Concurrency Management Division. The project number assigned to this development project is LCM090019. The location and land uses associated with this development project are stated in the Application for Concurrency Determination. I hereby state my intent to enter into a Concurrency Agreement with Leon County for the above referenced development project, pursuant to the provisions the Tallahassee-Leon County Comprehensive Plan, Chapter 10 of the Leon County Code of Laws, and the Leon County Concurrency Policies and Procedures Manual, for the purpose of ensuring that necessary public facilities are in place to provide for the impacts of the above referenced development. I understand that the terms of the Concurrency Agreement will be negotiated with the Director of Development Services and the County Attorney of Leon County, Florida and are subject to approval by the County Commission.

[Handwritten Signature]
Signature

Oct. 9, 2009
Date

BOARD OF DIRECTORS

FRIENDS OF WAKULLA SPRINGS STATE PARK, INC.

A citizen group dedicated to the protection and enhancement of Wakulla Springs State Park

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Crystal Wakoa
Counselor

Ryan Culpepper
Development Services Administrator
Leon County Growth & Environmental Management
Renaissance Center, 2nd Floor
435 N. Macomb St
Tallahassee, FL 32301

October 12, 2009

RE: "Chason Woods Conservation Subdivision"

Dear Mr. Culpepper:

On behalf of the Friends of Wakulla Springs State Park (Friends), please consider these comments regarding the Chason Woods Conservation Subdivision coming before the Leon County Department of Growth and Environmental Management's for technical review on October 14, 2009. The Friends are very concerned about the potential impact of such a large development on the Wakulla Spring contribution zone and have been advocating for the State purchase of this land for conservation and preservation¹. As you may know, this specific parcel is on the State Land Acquisition List, and there is great support for state acquisition including from the Wakulla County Board of County Commissioners¹.

The health of Wakulla Springs has been in dramatic decline over the past few decades as the area's population and growth has increased. This decline in health as resulted in higher profile attention from area scientists, citizens, non-governmental organizations, State and local officials and elected politicians. There have been several joint commission meetings between Wakulla and Leon Counties and the City of Tallahassee working on ways to protect the spring¹. There have been several forums, all-day workshops, and a multi-day technical workshop resulting in a large publication specific to Wakulla Springs.¹ Not only has the health of Wakulla Springs garnered much public and scientific attention, it also contributes substantially to the regional economy¹ and is the backbone of the area's ecotourism development. While the health of Wakulla Springs and the aquifer that empties into it may be technically outside the purview of this Committee, the health of this beloved Spring and Park has to be at the forefront of planned growth and development within its springshed.

This is the very reason that Leon County recently adopted a Primary Spring Protection Zone (PSPZ)¹ and accompanying changes to the Comprehensive Plan. This effort has landed the Tallahassee-Leon County Planning Department Florida Planning and Zoning Association's Excellence an Environmental Planning Award.

These efforts should be highly commended and the Friends are very appreciative of all this excellent work and attention. We hope that you will continue your efforts in the contemplation of planning for this parcel.

A significant portion of decline has been attributed to both septic systems within the springshed and the City of Tallahassee's sprayfield at Tram Road¹. The sprayfield was the subject of highly profiled litigation several years ago and resulted in the City's commitment to update the TP Smith Wastewater Treatment Plant to advanced wastewater treatment. However, increasing the load to the TP Smith Plant increases the overall load of nitrogen pollutants dispensed on the Sprayfield, shown to be linked to Wakulla Springs by the Hazlett-Kincaid Dye Trace Study. The Growth and Environmental Management staff should consider the impact this proposal will have on Wakulla Springs.

We ask that in your commitment to protect Wakulla Springs that you take action to assure that the least amount of damage occurs.

We look forward to working with you on this resolution.

I can be reached at 850 926-5049 or by e-mail at Ron_Piasecki@earthlink.net

Regards,

Ron Piasecki

Ron Piasecki, President
Friends of Wakulla Springs State Park

¹ Friends Letter dated July 1, 2008 to Florida Department of Environmental Protection, Division of State Lands Acquisition

¹ Wakulla County Resolution 2009-018

¹ Wakulla Springshed Regional Partnership Memorandum of Understanding February 26, 2009.

¹ Follow-up Report to the Wakulla Spring Restoration Workshop. Held at the Antique Car Museum, Tallahassee, Florida. February 25-26, 2009.

¹ Bonn and Bell. 2003. Economic Impact of Selected Springs on Surrounding Local Areas. 122 pp.

¹ Tallahassee-Leon County Wakulla Springs Initiative (available at www.talgov.com)

BOARD OF DIRECTORS

FRIENDS OF WAKULLA SPRINGS STATE PARK, INC.

A citizen group dedicated to the protection and enhancement of Wakulla Springs State Park

July 1, 2008

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Crystal Wako
Counselor

Ex-Officio:
Brian Fugate
Park Manager

Bonnie Allen,
Assistant Park

Michael Sole, Secretary
Department of Environmental Protection
3900 Commonwealth Blvd.
Tallahassee, Florida 32299

Dear Mr. Sole:

The *Friends of Wakulla Springs* write in support of the purchase the Chason Woods property located four miles north of Wakulla Springs State Park at the Leon-Wakulla County Line. The property, which may soon be under development, has many karst features that contribute to the aquifer. All of them are in the contribution zone to Wakulla Springs. Because of the high vulnerability of these lands, the acquisition of this property is critical to the protection of Wakulla Springs.

The Chason Woods property lies directly south of the Ames Sink Area Swamp and comprises 700 acre of wooded lands heavily laden with karst features. At least two of these karst features may have a direct link to Wakulla Springs due to their proximity to the Ames Sink conduit which has been linked to the Spring in the dye trace studies preformed by Hazlett-Kinkade. One of those sinks was surveyed by divers in December of 2007. They described a large fissure extending down through the limerock to three small spring vents each about 8" high and several feet wide at about 70' below the surface. The vent walls were scalloped limestone kept white by flow and cave crayfish were observed in the openings.

Most of the features are concentrated from the center of the property towards the west side of the property running from the north to south. LIDAR maps clearly show a pattern of wetland connections and slough lines between all these areas and the Ames Sink Swamp Area. It would not be unreasonable to assume that most, if not all of the conduits from Ames Area Swamp pass under the property. Other documented studies indicate the water flowpath from the Ames Area (and also the City of Tallahassee's Waste Water Treatment Sprayfield) pass through this property towards the Indian and Wakulla Springs cave systems.

These many karstic features which inevitably affect Wakulla Springs create a vulnerability to the Spring. The purchase of this property for public trusts helps ensure Wakulla Spring's health. We strongly encourage you to make the acquisition of the Chason Woods property a priority.

Sincerely,

Ron Piasecki
President

550 Wakulla Park Drive ~ Wakulla Springs, FL 32327-0390
Telephone (850) 926-0700 - Website: www.wakullasprings.org
Park Manager Email: Brian.Fugate@dep.state.fl.us



October 13, 2009

Mr. Ryan Culpepper
Development Services Administrator
Leon County Growth and Environmental Management Developmental Services

RE: Technical Review of "Chason Woods Conservation Subdivision"

Dear Mr. Culpepper:

As President of the Wakulla Watershed Coalition (WWC), I am writing to submit commits regarding the Chason Woods Conservation Subdivision for the October 14, 2009 technical review meeting. The WWC is an organization comprised of individuals and persons involved with other area organizations and that works to protect water quality and quantity in Wakulla County through education and advocacy. Last year, we spearheaded the expansion of the Wakulla Springs Special Planning Area based on the recent scientific data (a.k.a., "Wakulla Spring Protection Zone") while working with Wakulla County staff and Commissioners. We also supported Leon County's efforts to adopt the Primary Spring Protection Zone (PSPZ) earlier this year.¹

We have a number of concerns regarding Chason Woods Conservation Subdivision project that can be categorized as:

1. Project within Wakulla Spring contribution zone,
2. Development of Regional Impact
3. High density, Incompatibility with surrounding land
4. Conservation Area
5. Urbanization of watershed

Project within Spring Protection Zone

The project site for this proposed development lies within four miles of Wakulla Springs and sits atop and completely within the watershed. This property is up to 70% in environmentally sensitive lands, such as wetlands, karst features, and is indirectly and may be directly connected to the groundwater aquifer. As you may know, this specific

¹ Wakulla Watershed Coalition letter to Chairman Brian Desloge, March 19, 2009.

parcel is on the State Land Acquisition List² which supports the sensitive nature of this property. The Wakulla County Board of County Commissioners has recently adopted a policy supporting state acquisition of this land.³ Keeping this land in its natural state would be the best use of this parcel.

Earlier this year, Leon County adopted the PSPZ as a way to provide awareness and some limited developmental policies in the area of the county that is most vulnerable to contaminating the groundwater and aquifer. Likewise, the property is immediately adjacent to the recently expanded "Wakulla Springs Protection Zone." These two spring protection zones are areas that are known to be within the contribution zone for Wakulla Spring: a major economic engine in the region. These zones were created and expanded based on recent science. The Leon County Aquifer Vulnerability Assessment (LAVA) was recently completed which significantly contributed to the PSPZ. The LAVA assessment shows that this parcel is wholly contained with the two most vulnerable categories. The proposed development does not go far enough to protect this very sensitive natural resource and groundwater which largely serves as our region's drinking water. In fact, as proposed, the development goes beyond what should be allowed and seeks to further intensify the land use by seeking the maximum number of residential units that could be possible. This is not acceptable.

Development of Regional Impact

According to the pre-Application material and subsequent department documentation, the applicant has committed to "workforce affordable housing" and is seeking a deviation from land development standards. Together, these two components of their plan seek to nearly double the number of units allowed on the property while being exempt from state review through the Development of Regional Impact process. While the notion and commitment of affordable housing is noble, this maneuver can be viewed as a less noble scheme to avoid a state comprehensive review of the potential impacts of this project. This project should be voluntarily submitted to the Department of Community Affairs seeking a DRI review. If the applicant is committed to both affordable housing and protecting Wakulla Springs, then a DRI review may serve to accommodate both. As we all know, putting urban-style development on or near extremely sensitive land with probable connections to the aquifer, even with sewer, will impact Wakulla Springs and the aquifer. So by definition, this becomes a development of regional impact and should be treated as such.

Too High Density, Incompatibility

According to the application documentation, the applicant is seeking a deviation from the developmental standard for a Conservation Subdivision of minimum lot size from 0.50 to 0.25 acres in order to be able to gain approval for the maximum number of densities allowed within this category. This deviation should not be recommended for approval and should be outright rejected. This type of high density is incompatible with

² Acquisition & Restoration Council Recommended August 2009 Florida Forever Priority List

³ Wakulla County Resolution 2009-018

the surrounding land use and zoning. The applicant is not simply entitled to the maximum units in all cases even if it requires changing the standards and if there is the promise or even an identified mechanism of paying for the extension of sewer to this site. Even without this deviation, the project could contain some 300-400 residential units, far too many given the nature of the land. As it stands now, the Conservation Subdivision category as allowed within the PSPZ, the developmental standards are not nearly restrictive enough.

The allowable density for this project under the Urban Fringe (UF) zoning and land use and as a "conservation subdivision" is 1.33 dwelling units per acre with a minimum lot size of 0.50 acres. Within the PSPZ, in areas designated as UF, the permitted density is 1 dwelling unit per 3 acres where sewer is not available, which is the approximate density of much of the surrounding area. This would equate to approximately 232 dwelling units on performance-based septic systems. Even at this density, this would allow far too many houses and pollution on such a small space that is proposed as developable. However, as a Conservation Subdivision with sewer available, allowable densities would enable 523 residential units on 273 acres which is just slightly over the minimum lot size allowed (0.50 acres). It is inconceivable how 4 units per acre for 273 acres would even be compatible with the intent and goals of the PSPZ and the concept of a Conservation Subdivision.

Given the constraints of the parcel and the environmentally sensitive features contained on site, the Planning Department and the County should be working with the developer to get the residential impact and the overall footprint of the project as low as possible, not attempting to squeeze out as many units as possible and legally allowed. Clearly, the applicant has demonstrated much more concern with maximizing residential units to increase developmental potential over protecting the health of Wakulla Springs.

Conservation Area Based on Environmental Sensitivity of the Land

As part of the Conservation Subdivision development category, at least half of the parcels are required to be put into a conservation easement and only used for passive uses. According to the application, approximately 62% of the land is to be put into conservation. However, the applicant has mentioned in public meetings that they might drop that down to 50% if they do not receive the deviation of the allowable minimum lot size from 0.50 to 0.25 acres. The amount of land that is put into the conservation easement should not be dictated on how many houses the applicant desires, but should be primarily based on the sensitive nature of the land and location of this sensitive land on site. For instance, if wetlands and karstic features are scattered throughout the property, this should severely constrain the types and locations of land uses allowed. The intensity use of this land (*i.e.*, how many units are allowed) should not be based on the applicant's bottom line, but how many units and its accompanying infrastructure can safely be put on this property given the constraints of the environmental sensitivities of this land. Additionally, requiring projects within the PSPZ to implement Low-Impact Development standards is a good policy but should not be used as a way to

justify higher density or projects that intensify the land use as such that will jeopardize the watershed and springs.

Urbanization of the Springshed

The applicant is proposing to extend sewer lines up to six miles through Woodville, which is the preferred method for sewage treatment in this area. However, it is unclear and highly questionable that the T. P. Smith Wastewater Treatment Plant could even handle an increase in sewage treatment from this development and the affected Woodville Rural Community. It can be presumed to a high degree of confidence that if a sewer line is extended through Woodville, this would likely spur future intensified growth in that region of the county. The County and Planning Department should consider impacts and effects not just from the proposed development, but on also on potential subsequent urbanization of the region four miles directly north of Wakulla Spring. It is poor planning to run a sewer line six miles to put nearly 2,000 new residents crammed in 4 houses per acre on top of a groundwater recharge area. Enabling maximum density in order to pay for extending sewer lines some six miles through low-density, rural residential areas is in effect sprawl.

Conclusion

In conclusion, we urge the technical review panel to carefully examine the potential impacts from this project to regional groundwater and natural resources and look for ways to decrease this impact through minimizing residential development and increasing conservation areas. We look forward to working with the staff and the County to accomplish these goals. Feel free to contact me to address any concerns raised in this letter.

Respectfully,



Chad W. Hanson
President
Wakulla Watershed Coalition



MEMORANDUM

TO: Ryan Culpepper, Planner – Leon County
FROM: Jimmy Lee, P.E.
Development Manager
DATE: October 14, 2009
SUBJECT: **CHASON WOODS CONSERVATION SUBDIVISION “C”**
LSP090035 (46-13-20-403-0000)

I. Project Description:

This is a proposed 523 single family residential lots on 697.1 acres located at the east side of Wakulla Springs Road, approximately one-half mile south of Oak Ridge Road, and bordered on the south by County Line Road.

II. Standards of Review:

- 1) Water Utility reviews utility concept plans for compliance with, *the Water and Sewer Agreement, The City of Tallahassee Design Specifications for Water and Sewer, Florida Department of Environmental Protection (FDEP) F.A.C. Section 62-555, The American Water Works Associations Manual of Practice "M31", FDEP F.A.C. Section 62-604, and FDEP MOP 9, as well as sound engineering practice.*

III. Findings of Fact:

- 1) Water and sewer extensions are required to serve this site.
- 2) Connection to water and sewer are required.

IV. Condition of Approval:

- 1) Water Utility is in the process of reviewing the “Water and Sewer Concept Plan”.
- 2) A “Letter of Agreement” will be required prior to construction plan approval and permitting.
- 3) DEP Permits for water and sewer are required.

V. Required Design Change

- 1) None at this time.

SUPERINTENDENT
Jackie Pons

BOARD CHAIR
Georgia "Joy" Bowen

BOARD VICE-CHAIR
Maggie Lewis-Butler



BOARD MEMBERS
Dee Crumpler
Dee Dee Rasmussen
Forest Van Camp

DIRECTOR OF MAINTENANCE
Stephen Shelton

October 14, 2009

Ryan Culpepper
Department of Growth Development Services and Environmental Management
435 N. Macomb Street
Tallahassee, Florida 32301

Mr. Culpepper:

Be advised that Chason Woods Conservation Sub-Division "C" LSP 090035 will need a completed SIA form to determine an exact school impact. The school zones are Woodville Elementary School, Nims Middle School and Rickards High School.

Thank you,

A handwritten signature in black ink that reads "Butch Callahan". The signature is fluid and cursive, with a large loop at the end.

Butch Callahan
Leon County Schools

Maintenance Department
3420 West Tharpe Street · Suite 200 · Tallahassee, Florida 32303-1138
Phone (850) 617-1777 · Fax (850) 617-1789
www.leon.k12.fl.us

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