

# Board of County Commissioners

## Division of Planning & Development

### Planning Services

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Website: <http://sumtercountyfl.gov/planning>



# Memo

**To:** Board of County Commissioners  
**From:** Brad Cornelius, AICP, CPM, Director  
**Date:** October 22, 2010  
**RE:** Response to ORC from DCA for Amendment 10-01

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The following provides a brief overview of the Objections, Recommendations, and Comments (ORC) report from the Florida Department of Community Affairs (DCA) for the County's DCA No. 10-01 large scale comprehensive plan amendments. The two proposed amendments are:

CP-A2010-0001 – Monarch Ranch – 2,866 acres from Agriculture to Industrial  
CP-A2010-0002 – Amendments to Intergovernmental Coordination Element for Interlocal Service Boundary Agreements with the cities of Webster and Center Hill.

DCA's objections are presented in regular text with the response from staff in *italic text*.

Objection # 1 – Acreage of property for Monarch Ranch is inconsistent.

*The acreage has been confirmed by the applicant as 2,866 acres.*

Objection # 2 – Insufficient protection of environmentally sensitive areas of the property.

*The applicant's consultant, BDA Environmental Consultants, provided an exhaustive response to this objection. In summary, wetlands that are part of Florida's Outstanding*

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*Florida Waters (OFW) designation will be placed into a voluntary conservation easement. These OFW wetlands are focused in the northwest corner of the property. The proposed policy to be adopted with this map amendment includes this revision. In addition, any other wetland impacts would be permitted and mitigated as required by local, state, and federal law. See the attached full BDA response.*

Objection #3 – Insufficient data and analysis to show ability by the City of Wildwood to serve the property with potable water and sewer service.

*The applicant's consultant, Ackerman Senterfitt & Edison, PA, provided additional information from the City of Wildwood demonstrating their ability to serve the property with potable water and sewer. See the additional information from Ackerman Senterfitt & Edison, PA, attached.*

Objection #4 – Insufficient data and analysis to address the near and long term traffic impacts of the proposed amendment.

*The applicant's consultant, TPD, Inc., provided a response to the objection on how the analysis will be updated to address the objections. See response from TPD, Inc. attached.*

*In addition, the applicant and staff maintain the position that given the scale and long term potential buildout for this property, the most effective method of determining and mitigating the traffic impacts is through the Development of Regional Impact (DRI) process. The proposed policy to be adopted with this map amendment still contains the requirement that a DRI must be approved prior to any Industrial development of the property.*

*Also, for the Board's information, the Lake-Sumter Metropolitan Planning Organization (MPO) included as part of its transportation planning processes (Priority List and Draft 2035 Long Range Transportation Plan) two projects that were identified by the original traffic analysis to support the future Industrial development of the property (Monarch Blvd. – parallel reliever to US 301 through the Monarch Ranch property and potential future I-75 interchange at CR 514). The inclusion of these projects in the MPO planning process demonstrates the coordination of this proposed amendment with long range regional transportation planning.*

Objection #5 – Proposed policy for Monarch Ranch does not provide for a meaningful and predictable land use due to the reliance on the DRI.

*The applicant's consultant, Ackerman Senterfitt & Edison, PA, provided a response to his objection that demonstrates the use of the DRI as part of the policy is consistent with the applicable State law. See the additional information from Ackerman Senterfitt & Edison, PA, attached.*

DCA raised no objections to amendment CP-A2010-0002.



STATE OF FLORIDA  
**DEPARTMENT OF COMMUNITY AFFAIRS**

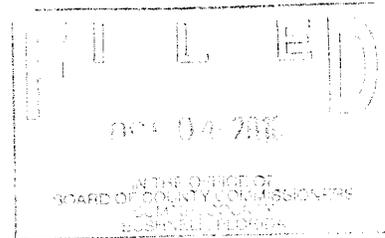
*"Dedicated to making Florida a better place to call home"*

CHARLIE CRIST  
Governor

THOMAS G. PELHAM  
Secretary

September 24, 2010

The Honorable Doug Gilpin  
Chairman, Sumter County Board of County Commissioners  
910 North Main Street, Suite 301  
Bushnell, Florida 33513



Dear Chairman Gilpin:

The Department of Community Affairs has completed its review of the proposed Comprehensive Plan Amendment for Sumter County DCA Number 10-1, which was received on July 26, 2010. Copies of the proposed amendment were distributed to appropriate state, regional and local agencies for their review and their comments are enclosed.

The Department has reviewed the comprehensive plan amendment for consistency with Rule 9J-5, Florida Administrative Code and Chapter 163, Part II, Florida Statutes and the Sumter County Comprehensive Plan. The amendment involves changes to the Future Land Use Map and Element as well as text changes to the Intergovernmental Coordination Element. The Department identified issues within the report pertaining to the proposed Future Land Use Map Amendment and the associated text policies to the Future Land Use Element.

For your assistance, we have attached procedures for final adoption and transmittal of the comprehensive plan amendments. If you have any questions, please contact Emily Howard, Planning Analyst, at (850) 922-1811 or via e-mail at [emily.howard@dca.state.fl.us](mailto:emily.howard@dca.state.fl.us).

Sincerely,

Mike McDaniel, Chief  
Office of Comprehensive Planning

MM/eh

Enclosure: Objections, Recommendations and Comments Report  
Review Agency Comments

Copy To: 5  
Comms \_\_\_\_\_  
Co Atty \_\_\_\_\_  
Co Fin \_\_\_\_\_  
Other \_\_\_\_\_

Pub Wks Div \_\_\_\_\_  
Bldg & Dev Div 7  
Admin Div \_\_\_\_\_  
Com Svcs Div \_\_\_\_\_

cc. Mr. Michael Moehlman, Withlacoochee Regional Planning Council  
Mr. Bradley T. Cornelius, AICP, Sumter County Planning Manager

10-8-10  
cm

**DEPARTMENT OF COMMUNITY AFFAIRS**  
**OBJECTIONS, RECOMMENDATIONS AND COMMENTS REPORT**  
**THE SUMTER COUNTY**  
**COMPREHENSIVE PLAN AMENDMENT 10-1**

September 24, 2010  
Division of Community Planning  
Office of Comprehensive Planning

This report is prepared pursuant to Rule 9J-11.010,  
F.A.C.

## TRANSMITTAL PROCEDURES

Upon receipt of this letter, Sumter County has 60 days in which to adopt, adopt with changes, or determine that the County will not adopt the proposed amendment. The process for adoption of local government comprehensive plan amendments is outlined in s. 163.3184, F. S., and Rule 9J-11.011, F.A.C. The County must ensure that all ordinances adopting comprehensive plan amendments are consistent with the provisions of Chapter 163.3189(2)(a), F.S.

Within ten working days of the date of adoption, the County must submit the following to the Department:

Three copies of the adopted comprehensive plan amendments;

A listing of additional changes not previously reviewed;

A listing of findings by the local governing body, if any, which were not included in the ordinance; and

A statement indicating the relationship of the additional changes to the Department's

Objections, Recommendations and Comments Report.

The above amendment and documentation are required for the Department to conduct a compliance review, make a compliance determination and issue the appropriate notice of intent.

In order to expedite the regional planning council's review of the amendments, and pursuant to Rule 9J-11.011(5), F.A.C., please provide a copy of the adopted amendment directly to the Executive Director of the Withlacoochee Regional Planning Council.

Please be advised that Section 163.3184(8)(c), F.S., requires the Department to provide a courtesy information statement regarding the Department's Notice of Intent to citizens who furnish their names and addresses at the local government's plan amendment transmittal (proposed) or adoption hearings. In order to provide this courtesy information statement, local governments are required by law to furnish the names and addresses of the citizens requesting this information to the Department. **Please provide these required names and addresses to the Department when you transmit your adopted amendment package for compliance review. In the event there are no citizens requesting this information, please inform us of this as well.** For efficiency, we encourage that the information sheet be provided in electronic format.

## ***INTRODUCTION***

The following objections, recommendations and comments are based upon the Department's review of Sumter County's proposed amendments to their comprehensive plan (DCA number 10-1) pursuant to Chapter 163.3184, Florida Statutes (F.S.).

The objections relate to specific requirements of relevant portions of Chapter 9J-5, Florida Administrative Code (F.A.C.), and Chapter 163, Part II, F.S. Each objection includes a recommendation of one approach that might be taken to address the cited objection. Other approaches may be more suitable in specific situations. Some objections may have initially been raised by one of the other external review agencies. If there is a difference between the Department's objection and the external agency advisory objection or comment, the Department's objection would take precedence.

Each of these objections must be addressed by the local government and corrected when the amendment is resubmitted for our compliance review. Objections, which are not addressed, may result in a determination that the amendment is not in compliance. The Department may have raised an objection regarding missing data and analysis items, which the local government considers not applicable to its amendment. If that is the case, a statement justifying its non-applicability pursuant to Rule 9J-5.002(2), F.A.C., must be submitted. The Department will make a determination on the non-applicability of the requirement, and if the justification is sufficient, the objection will be considered addressed.

The comments, which follow the objections and recommendations section, are advisory in nature. Comments will not form bases of a determination of non-compliance. They are included to call attention to items raised by our reviewers. The comments can be substantive, concerning planning principles, methodology or logic, as well as editorial in nature dealing with grammar, organization, mapping, and reader comprehension.

Appended to the back of the Department's report are the comment letters from the other state review agencies and other agencies, organizations and individuals. These comments are advisory to the Department and may not form bases of Departmental objections unless they appear under the "Objections" heading in this report.

# OBJECTIONS, RECOMMENDATIONS AND COMMENTS REPORT

## FOR SUMTER COUNTY

### PROPOSED COMPREHENSIVE PLAN AMENDMENT 10-1

#### **I. CONSISTENCY WITH RULE 9J-5, F.A.C., AND CHAPTER 163, F.S.**

The County is proposing to change the land use designation of an approximate 2,800 acre site from County Agriculture to County Industrial. The amendment also involves text amendments to the Future Land Use and the Intergovernmental Coordination Element. The Department has identified the following objections to the proposed amendments:

##### **A. FLUM Amendment:**

- 1. Inconsistent Data and Analysis:** Included in the amendment are three different acreages for the lands subject to the proposed FLUM change. The staff report indicates 2,688 acres, yet later cites 3,266 acres, and a third reference in the data and analysis notes 2,975 acres. Thus, it is unclear what the exact size of the land area for which the amendment is proposed.

Additionally, the data and analysis states there are approximately 1,100 acres of wetlands or inaccessible preservation areas. However, the data and analysis in the environmental assessment of the site shows on Figure 2.1-1 that 1,312 acres are wetlands. Thus, the analysis has not provided accurate documentation of the extent of wetlands on the site.

Authority: Section 163.3177(2) and (6)(a), F.S., and Rules 9J-5.005(2) and (5); 9J-5.006(2)(b) and (c), F.A.C.

**Recommendation:** Provide the exact acreage of the proposed Future Land Use Map Amendment site. Also, provide the amount of acreages of wetlands on the subject site and if some of the site is already designated preservation show this amount as well. The data and analysis should identify types, sizes, values, functions, conditions and locations for the wetlands on site. Also, the data and analysis should classify the wetlands consistent with the classes of wetlands established in the County's Comprehensive Plan.

- 2. Environmental Suitability:** The proposed amendment designates 2,688 acres as Industrial. The current Future Land Use Map designation is Agriculture with a maximum density of one unit per ten acres. The proposed amendment will increase development potential of the site to 16,355,000 square feet of industrial uses limited by a proposed site specific policy.

Based on the data and analysis provided the amendment site is not environmentally suitable for the types and intensities of the proposed land uses. Nearly 50% of the site is wetland systems connected to Lake Panasoffkee, an Outstanding Florida Waterway (OFW). Allowing 16,355,000 square feet of industrial uses to locate on this site will increase runoff in the area and introduce hazardous substances into the surface and underground water of the area including Lake Panasoffkee an OFW. Pursuant to 163.3177(6)(a), F.S., and Rule 9J-5.006(3)(b)1, F.A.C., the future land use plan must be coordinated with the environmental conditions of the site. The proposed amendment has not been demonstrated to be consistent with this requirement of state law. The Southwest Florida Water Management District purchased a property adjacent to this

site with the purpose of preserving and protecting the associated uplands, wetlands, and tributaries of Lake Panasoffkee. It has not been demonstrated that the proposed industrial uses will be compatible with the adjacent lands and ensure the protection of the natural resources of the area.

Proposed Policy 7.1.2.19(g) states that all activities within the Monarch Industrial Park shall be planned to avoid adverse impacts to wetlands and the required buffers as described in Policies 3.1.4-3.1.4.13 of the Conservation Element. While, the referenced conservation policies outline 5 different classes of wetlands and how each of these classes will be protected, the proposed amendment does not classify the onsite wetlands into the categories of the plan policies and does not show how they will be protected.

Further, the proposed amendment is inconsistent the following policies of the Comprehensive Plan:

Future Land Use Element Policy 7.1.2.16 which states that *industrial locations shall be provided along railroad corridors and the I-75 corridor (especially near interchanges) on site that have no environmental constraint*, because the site for the amendment has environmental constraints.

Future Land Use Element Objective 7.1.10 which states that *Sumter County shall preserve and conserve unique and environmentally sensitive lands and resources from development or development impacts* because by designating the site for industrial use the County is not conserving and protecting unique environmentally sensitive lands and resources from the impacts of development.

Conservation Element Policy 3.1.6.7 requires the County to *seek methods to indentify and restrict inappropriate development to enhance the natural systems on the southwest side of Lake Panasoffkee*. By designating the site for industrial use the amendment is not consistent with the protection of Lake Panasoffkee.

Pursuant to Rule 9J-5.013(3)(b), F.A.C., incompatible land uses are to be directed away from wetlands. The proposed amendment does not ensure that incompatible land uses will be directed away from the large number of wetlands on the site.

Authority- Sections 163.3161(3) and (5); 163.3177(2), (6)(a), (c), and (d), (8), and (10); 163.3187(2), F.S.; Rules 9J-5.005(2), (5), and (6); 9J-5.006(1), (2)(a) and (b), (3)(b) 1 and 4, (3)(c)1 and 6; and 9J-5.013(1), (2)(c)b, and (3), F.A.C.

**Recommendation:** Based on the information provided with the amendment the majority of the site is not suitable for industrial development as proposed in this amendment. In view of this, the Department recommends that the County not adopt the amendment. Alternatively, the County may identify the most suitable portion of the site in the vicinity of existing roadways and infrastructure that will have the least impact on natural resources for industrial use, and designate the remainder of the site Conservation. By designating only a portion of the site for industrial use and designating the remainder for conservation use the County would be directing incompatible land uses away from wetlands as required by State law. The Conservation portion of the site should be placed into a permanent conservation easement at the time of amendment adoption. The County may need to create a new Conservation Future Land Use category or

revise the existing category to achieve this because the existing Conservation category is reserved only for publicly owned lands.

- 3. Potable Water and Wastewater:** Included in the data and analysis is a letter from the City of Wildwood stating that .67 million gallons per day of water will be supplied to the site and .56 million gallons per day of wastewater treatment will be provided. However, the data and analysis does not provide specific amounts of the projected potable, non-potable, and wastewater demands for the proposed Industrial uses. Additionally, a LOS analysis was not conducted to ensure the demand can be absorbed by the City of Wildwood.

Authority: Sections 163.3161(3); 163.3167(13); 163.3177(2), (3), (6)(a) and (c), (8), (10); and 163.3180(1), (2)(a), F.S.; and Rule 9J-5.005(2) and (5), (4); 9J-5.005(3)(a); 9J-5.006(2)(a), (3)(b)1, (3)(c)3; 9J-5.011(2)(b)1 and 2, and (2)(c); 9J-5.016(1)(a), (2), (3)(b) 1, 3, 4, and 5, (3)(c)1.e, 1.f, 1.g, 6, 8, (4)(a) and (b), F.A.C.

**Recommendation:** Submit data and analysis necessary to support the amendment and demonstrate that sufficient potable water and wastewater treatment capacity exists or is planned to be available to serve the proposed amendment at the maximum development potential and at the adopted LOS standards for these facilities. The data and analysis must also demonstrate coordination with all other pertinent Comprehensive Plan Amendments and the planning for and the provision of public facilities. Capital improvements needed to address deficiencies identified within the next five years must be included in a financially feasible Five-Year Schedule of Capital Improvements.

- 4. Transportation:** The proposed amendment contains analysis of the traffic impacts for the proposed amendment. The traffic analysis concludes that there will be level of service standard deficiencies on I-75, US 301, and C-470 in the 2015 and 2020 planning timeframes. The traffic analysis provides a conceptual framework for transportation improvements to mitigate the impacts and enhance transportation services. These conceptual improvements include a US 301 By-Pass, potential interchanges on I-75 at CR514 and Florida Turnpike with the US 301 By-Pass. However, these improvements are not included in the 5-year schedule of capital improvements or are planned for within the County's long term planning timeframe of 2020. Also, proposed Policy 7.1.2.19 defers to a future DRI proposal the planning for transportation facilities instead of addressing it during this amendment process as required. Pursuant to Chapter 163.3177(6)(a), F.S., the future land use plan shall be based upon the availability of public facilities and services. The amendment has not been demonstrated to meet this requirement of state law.

Additionally, proposed Policy 7.1.2.19(d) of the Future Land Use Element states that the DRI for the Monarch Industrial Park shall also identify the procedures for determining transportation needs, identifying funding mechanisms, the protection of transportation corridors, and the monitoring of transportation impacts. It is not appropriate to defer the identification of transportation needs and funding mechanisms to address the impact of an amendment to a future DRI proposal.

Authority: Sections 163.3177(2) and (3), (6)(a), (b) and (j), (8) and (10); and 163.3180(10)., F.S.; Rules 9J-5.005(2) and (5)(a); 9J-5.006(2)(a) and (3)(b)1 and (3)(c)3; 9J-5.016(1)(a); 9J-5.016(2)(b, c, and f); 9J-5.016(4)(a)1 and 2; 9J-5.019(3)(f, g, and h), F.A.C.

**Recommendation:** Revise the amendment to address the needed roadway improvements in the short term (2015) and long term (2020) planning timeframes. The County should coordinate the road improvements or other planning alternatives with the Future Land Use Element, Transportation Element (including Future Transportation Map), and Capital Improvement Element, and address any short term need through the five-year Schedule of Capital Improvements. The corrections of deficits related to state facilities must be coordinated with the plans of the Florida Department of Transportation. Improvements needed after five years should be addressed in the plan but they need not be funded.

**B. Proposed Text Amendments (FLUM):** The County has proposed text amendments to the Future Land Use and the Intergovernmental Coordination Element. The Department identifies the following objection and comment to these amendments:

**5. Inconsistent Provisions:** Proposed Future Land Use Element Policy 7.1.2.19(c) states that changes to the Future Land Use Map will occur upon the processing and approval of a Development of Regional Impact (DRI). This is inconsistent with the requirements of Chapter 163.3177(6)(a), F.S., and Rule 9J-5.005(1)(c)(5) and (6) and 9J-5.006(4)(a), F.A.C., that the future land use map depict future conditions and the plan be internally consistent. The proposed policy does not establish the intended Future Land Use Map category but defers it to the future thereby making the land use category for this site not meaningful and predictable and inconsistent with the requirements of the law.

Authority: Sections 163.3177(2), and (6)(a), F.S.; Rules 9J-5.005(1)(c), (5) and (6); and 9J-5.006(4)(a), F.A.C.

**Recommendation:** Revise the amendment to establish Industrial on the Future Land Use Map, consistent with the recommendation for the previous objection and delete Policy 7.1.2.19(c).

**Comment Intergovernmental Coordination Element:** The County is proposing to revise the Intergovernmental Coordination Element to add policies pertaining to coordination between the County and the Cities of Webster and Center Hill in order to facilitate the implementation of the Interlocal Service Boundary and Joint Planning Agreements that the County entered into with these municipalities. The Agreement includes a map that depicts areas around the City where land use changes may be sought in the future. While the Department does not object to the proposed revision to the Intergovernmental Coordination Element, the future incorporation into the City's Comprehensive Plan of the anticipated Future Land Use Map shall be closely reviewed to ensure that they do not provide for any greater development potential than what is needed to support the growth of each of these cities particularly in light of the population agreement directing 25% of the County's total population to the City of Wildwood.

## **II. CONSISTENCY WITH CHAPTER 187 F.S. STATE COMPREHENSIVE PLAN**

The proposed amendment is inconsistent with the following provisions of Chapter 187, F.S., the State Comprehensive Plan:

Goal (7) Water Resources, Policies (b) 2, 5, 8, 9, and 10, ensure that new development is compatible with local and regional water supplies, and protect wetlands and floodplains; because of Objections 1 through 3

Goal (9) Natural systems and Recreational Lands (a)(b) 1, 2, 3, 7, 10, concerning the protection of unique natural habitat and ecological systems; because of Objection 2

Goal (11) Energy, Policies (b) 1, 3, 4, and 5, reduce its energy requirements through enhanced conservation and efficiency measures; because of Objections 1, 3, and 4

Goal (15) Land Use, (a), concerning land use and directing development to those areas which have in place, or have agreements to provide, the land and water resources, fiscal abilities, and service capacity to accommodate growth in an environmentally acceptable manner; because of Objections 1 through 5

Goal (17) Public Facilities, (b) 1, 3, 4, 5, 6, 7, and 9, maximize the use of existing public facilities, allocate the cost of new public facilities based on the benefits received by existing and future residents, and develop fiscally sound and cost effective techniques for financing public facilities; because of Objections 1, 3, and 4

Goal (19), Transportation Policies (b) 3, 8, 9, 13, and 15, ensure the direction of future transportation improvements and aid in the management of growth; because of Objections 4

Goal (25) Plan Implementation, (a) (b) 5, 8 ensuring that functional plans are designated to achieve policies and goals consistent with the state law and that encourage cooperation among communities that have unique natural areas; because of Objections 1 through 5

**Recommendation:** Revise the amendments, as indicated in the objections and recommendations of this report, in order to be consistent with the above goals and policies of the State Comprehensive Plan.



"Scott, W Ray"  
<scotra@doacs.state.fl.us>  
08/31/2010 01:49 PM

To <DCPexternalagencycomments@dca.state.fl.us>  
cc  
bcc  
Subject FDACS LGCP amendment review

FDACS has reviewed the following LGCP amendment and has no objections, recommendations, or comments:

**Sumter County 10-1**

Please call if you have any questions or comments:

W. Ray Scott  
Conservation & Water Policy Federal Programs Coordinator  
Office of Agricultural Water Policy  
Florida Department of Agriculture and Consumer Services  
The Capitol (PL-10)  
Tallahassee, FL 32399-0810  
(office) 850-410-6714  
(mobile) 850-544-9871  
(fax) 850-922-4936



FLORIDA DEPARTMENT OF STATE

**Dawn K. Roberts**

Interim Secretary of State

DIVISION OF HISTORICAL RESOURCES

August 19, 2010

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

Re: Historic Preservation Review of the Sumter County 10-1 Comprehensive Plan  
Amendment

Dear Mr. Eubanks:

According to this agency's responsibilities under Section 163, *Florida Statutes*, and Chapter 9J-5, *Florida Administrative Code*, we reviewed the above document to determine if data regarding historic resources were given sufficient consideration in the request to amend the Sumter County Comprehensive Plan.

We reviewed one proposed amendment to the Future Land Use Map, in addition to one text amendment for the Intergovernmental Coordination Element, to consider the potential effects of these actions on historic resources. We note that a Phase I cultural resource assessment survey for the Monarch Ranch property, Amendment CP-A2010-0001, will be conducted prior to any land clearing or ground disturbing activities. We concur with the necessity for this survey as there are recorded archaeological sites on the perimeters of this property and adjacent to it. It is the county's responsibility to ensure that the proposed revisions will not have an adverse effect on significant archaeological or historic resources.

If you have any questions regarding our comments, please feel free to contact Susan M. Harp of the Division's Compliance Review staff at 850.245.6333.

Sincerely,

Laura A. Kammerer, Historic Preservationist Supervisor  
Compliance Review Section  
Bureau of Historic Preservation

pc: Mr. Bernard Piawah

500 S. Bronough Street • Tallahassee, FL 32399-0250 • <http://www.flheritage.com>

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## Florida Department of Transportation

CHARLIE CRIST  
GOVERNOR

133 South Semoran Boulevard  
Orlando, FL 32807-3230

STEPHANIE C. KOPELOUSOS  
SECRETARY

August 24, 2010

Mr. Ray Eubanks, Community Program Administrator  
Department of Community Affairs, State of Florida  
Plan Review & DRI Processing Section  
2555 Shumard Oaks Boulevard  
Tallahassee, FL 32399-2100

**SUBJECT: PROPOSED COMPREHENSIVE PLAN AMENDMENTS**  
**LOCAL GOVERNMENT: SUMTER COUNTY**  
**DCA #: 10-1**

Dear Mr. Eubanks:

The Department of Transportation has completed its review of the above proposed Comprehensive Plan Amendments as requested in your memorandum dated July 27, 2010.

We appreciate the opportunity to participate in this review process and we offer our comments with this letter. We provided the local government a courtesy review on August 8, 2010. **If further information is received from the local government prior to the issuance of the Objection, Recommendations and Comments (ORC) Report, the Department will revise the comments.**

If you have any questions, you may contact me at 407-482-7882 or by e-mail at [john.moore@dot.state.fl.us](mailto:john.moore@dot.state.fl.us), or Jon V. Weiss, Government Operations Manager, at 407-482-7881 or by e-mail at [jon.weiss@dot.state.fl.us](mailto:jon.weiss@dot.state.fl.us).

Sincerely,

John Moore, E.I.  
Systems Planner

attachment

C: Brad Cornelius, Sumter County  
Michael Moehlman, WRPC  
Rob Magee, FDOT  
Bernard Piawah, DCA

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## COMPREHENSIVE PLAN AMENDMENT REVIEW COMMENTS

**Local Government:** Sumter County  
**DCA Amendment #:** 10-1  
**Date of DCA's Request Memo:** 07/27/2010  
**Review Comments Deadline:** 08/25/2010  
**Today's Date:** 08/09/2010

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### GENERAL BACKGROUND INFORMATION

Sumter County has submitted one Future Land Use Map (FLUM) amendment and a series of text amendments.

For the FLUM amendment, FDOT evaluated how the trip generation potential of the property will change if the proposed FLUM designation is adopted. (Trip generation potential reflects the maximum amount of development that could occur on the property.) The pertinent FLUM designations are as follows:

- *Agriculture.* Allows 1 dwelling unit (du) per 10 acres, agricultural uses, commercial uses that directly support agriculture, borrow pits, mining, community-serving public facilities (e.g., schools, government buildings, parks, houses of worship, and hospitals).
- *Industrial.* Allows a 0.5 floor area ratio (FAR) within the urban development area and a 0.3 FAR outside the urban development area. Requires access to a collector or arterial.

---

**FDOT Contact:** John Moore, E.I., Systems Planner  
FDOT District 5  
**Telephone:** 407-482-7882  
**Fax:** 407-275-4188  
**E-mail:** [john.moore@dot.state.fl.us](mailto:john.moore@dot.state.fl.us)  
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Kittelson & Associates, Inc.  
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**COMPREHENSIVE PLAN AMENDMENT REVIEW COMMENTS**

**Local Government:** Sumter County  
**DCA Amendment #:** 10-1  
**Date of DCA's Request Memo:** 07/27/2010  
**Review Comments Deadline:** 08/25/2010  
**Today's Date:** 08/09/2010

**AMENDMENT CP-A2010-0001 (MONARCH INDUSTRIAL PARK)**

**ELEMENTS:** Future Land Use Element

**RULE REFERENCE:** Chapter 163.3177, F.S., Required and optional elements  
 Chapter 163.3184, F.S., Process for adoption  
 Chapter 380, F.S. Land and water management  
 Chapter 9J-5, F.A.C., MINIMUM CRITERIA FOR REVIEW  
 Chapter 9J-11, F.A.C., SUBMITTAL AND REVIEW

**BACKGROUND**

This amendment affects 2,866 acres located on the south side of the Turnpike, with I-75 to the west, the CSX S-line railroad to the east, and City of Coleman to the south. A text amendment accompanying the amendment adds Future Land Use Policy 7.1.2.19 to limit development to 16,335,000 square feet of industrial uses, requires development to proceed as a Development of Regional Impact (DRI), and stipulates that the site will be limited to uses allowed under Agriculture until the DRI is approved. The amendment also revises Policy 7.1.16.1 to change the existing requirement that all DRIs must proceed through the sector planning process to a requirement that only DRIs that exceed the residential DRI threshold must proceed through the sector planning process.

**Trip Generation Potential of Parcels Affected by FLUM Amendment**

Scenario	Land Use Designation	Maximum Allowed Intensity	ITE Land Use Code	Size of Development		Daily Trips	P.M. Peak Hour Trips
				Acres	Allowed Development		
Adopted	Agriculture	1 du/10 acres	210	2,866 ac	286 du	2,734	271
Proposed	Industrial	Limited by text amendment to 16,335,000 sf of industrial uses submitted as a DRI	130	2,866 ac	16,335,000 sf	113,692	14,048
Change in Trips						+110,958	+13,777

The State roadway segments located within five miles of the parcel are shown in the table below.

<b>FDOT Contact:</b> John Moore, E.I., Systems Planner FDOT District 5	<b>Reviewed by:</b> Cade Braud, P.E., & Kelly Blume, P.E. Kittelson & Associates, Inc.
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**COMPREHENSIVE PLAN AMENDMENT REVIEW COMMENTS**

**Local Government:** Sumter County  
**DCA Amendment #:** 10-1  
**Date of DCA's Request Memo:** 07/27/2010  
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**State Roadway Segments Affected by FLUM Amendment (Background Conditions)**

Roadway	Segment	FIHS/SIS/TRIP?	2009				2014				2019			
			LOS Standard	Service Volume at LOS Standard	AADT	Meets Standard?	LOS Standard	Service Volume at LOS Standard	AADT	Meets Standard?	LOS Standard	Service Volume at LOS Standard	AADT	Meets Standard?
SR 35/ US 301	East CR 470 to Wildwood Urban Limits	N	C	8,100	5,900	Y	C	8,100	6,100	Y	C	8,100	6,400	Y
	Wildwood Urban Limits to CR 523	N	D	16,500	5,900	Y	D	16,500	6,100	Y	D	16,500	6,400	Y
	CR 523 to Tumpike	N	D	22,200	10,200	Y	D	22,200	11,900	Y	D	22,200	13,500	Y
	Tumpike to SR 44	N	D	36,700	12,900	Y	D	36,700	14,700	Y	D	36,700	16,600	Y
	SR 44 to CR 44A	N	D	36,700	21,800	Y	D	36,700	25,900	Y	D	36,700	29,900	Y
	CR 44A to CR 466A	N	D	36,700	19,600	Y	D	36,700	23,300	Y	D	36,700	26,900	Y
	CR 466A to Lion St	N	D	64,300	15,100	Y	D	64,300	18,000	Y	D	64,300	21,000	Y
	Lion St to Urban Boundary	N	D	22,200	15,800	Y	D	22,200	19,500	Y	D	22,200	23,200	N
Urban Boundary to CR 126/CR 462	N	C	12,080	15,800	N	C	12,080	19,500	N	C	12,080	23,200	N	
SR 44	CR 470 to I-75	Y	B	26,300	7,900	Y	B	26,300	8,400	Y	B	26,300	8,800	Y
	I-75 to CR 44A	N	C	32,100	15,100	Y	C	32,100	16,600	Y	C	32,100	18,100	Y
	CR 44A to Wildwood Urban Limits	N	C	32,100	14,200	Y	C	32,100	16,300	Y	C	32,100	18,400	Y
	Wildwood Urban Limits to CR 179	N	D	36,700	11,800	Y	D	36,700	12,400	Y	D	36,700	13,000	Y
SR 471	CR 528 to SR 35	N	C	6,480	3,700	Y	C	6,480	3,900	Y	C	6,480	4,100	Y
I-75	CR 470 to Tumpike	Y	B	37,100	41,300	N	B	37,100	46,000	N	B	37,100	50,700	N
	Tumpike to SR 44	Y	B	56,500	74,300	N	B	56,500	88,500	N	B	56,500	102,700	N
	SR 44 to Marion County Line	Y	B	56,500	69,600	N	B	56,500	77,500	N	B	56,500	85,400	N
Tumpike	Lake Co to US 301	Y	C	57,600	38,900	Y	C	57,600	46,900	Y	C	57,600	55,000	Y
	SR 35/US 301 to SR 93/I-75	Y	B	37,100	35,100	Y	B	37,100	36,900	Y	B	37,100	38,600	N

NOTE: The information in this table is from FDOT's LOS\_ALL spreadsheet, which is a planning-level analysis tool.

<b>FDOT Contact:</b> John Moore, E.I., Systems Planner	<b>Reviewed by:</b> Cade Braud, P.E., & Kelly Blume, P.E.
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## COMPREHENSIVE PLAN AMENDMENT REVIEW COMMENTS

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### REVIEW COMMENTS

Developing the site under the Industrial future land use designation may result in significant impacts to State roadway segments in the vicinity of the site. Based on FDOT data, segments of State roadways (including SIS roadways) within the vicinity of the site currently do not meet the adopted LOS standard and/or are projected to not meet the adopted LOS standard.

FDOT offers the following comments on the applicant's May 2010 traffic study:

- The traffic study incorrectly states that the maximum intensity under Industrial is a 0.25 FAR. The County comprehensive plan indicates that a 0.50 FAR is allowed inside the urban development area and a 0.30 FAR is allowed outside the urban development area. Use of a 0.25 FAR, however, is consistent with the proposed text amendment that limits development of the site.
- The traffic study analyzes 2,600 acres. The FLUM amendment addresses 2,866 acres.
- The traffic study analyzes the proposed development scenario as High-Cube Warehouse. ITE's Industrial Park trip generation rates are a more appropriate match because the text amendment states that Monarch Industrial Park will include "a functional integration of industrial, warehousing, manufacturing, and supporting commercial and office uses" and will allow "all uses allowed in the industrial zoning category." Industrial Park trip generation rates are significantly higher than High-Cube Warehouse trip generation rates and are therefore more indicative of the maximum development scenario.
- FDOT has adopted an LOS B standard for the Turnpike between I-75 and US 301.
- Widening I-75 is not funded for construction within five years (per the June 23, 2010, Lake-Sumter MPO TIP), so it cannot be considered to be in place for the purposes of mitigating the impacts of the amendment under existing conditions or in the near term. Additionally, assuming that impacted I-75 segments will be re-classified from Rural to Transitioning is not a mitigation strategy. While FDOT acknowledges that area type could change as a result of the 2010 Census, this change has not occurred.
- Adjustments to the model trip distribution pattern should be described in more detail.
- The tables in Appendix A are not completely legible.
- The traffic study defers mitigation to the DRI process.

### RECOMMENDATIONS

FDOT believes that the following recommendations should be addressed in the adopted amendment.

Please revise the traffic study per the comments above. If the revised traffic study identifies a need for State roadway improvements, please identify the needed improvements. Needed near-term mitigation projects should be added to the five-year schedule of capital improvements. Needed long-term mitigation projects and/or strategies should be added to the Transportation and Capital Improvements Elements and

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**COMPREHENSIVE PLAN AMENDMENT REVIEW COMMENTS**

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coordinated with the LRTP. Please coordinate with adjacent local governments to ensure that the needed projects are reflected in those local governments' schedules and plans as necessary.

Regarding the future DRI intended for this site:

- Potential near- and long-term impacts of development of the site can be proactively addressed through the current FLUM amendment.
- FDOT will review the DRI through the DRI process and will work with the developer and the County to develop mitigation agreements for impacted State roadways.
- In case the DRI does not move forward, the proposed text amendment for this site should be revised to include language to the effect that the land use designation of the site will revert to Agriculture if the DRI is abandoned.

---

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**COMPREHENSIVE PLAN AMENDMENT REVIEW COMMENTS**

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**AMENDMENT CP-A-2010-0002 (POLICY 5.1.1.6 AND POLICY 5.1.1.7)**

**ELEMENTS:** Intergovernmental Coordination Element  
**RULE REFERENCE:** Chapter 163.3177, F.S., Required and optional elements  
Chapter 163.3184, F.S., Process for adoption  
Chapter 380, F.S. Land and water management  
Chapter 9J-5, F.A.C., MINIMUM CRITERIA FOR REVIEW  
Chapter 9J-11, F.A.C., SUBMITTAL AND REVIEW

**BACKGROUND**

This amendment adds Intergovernmental Coordination Policies 5.1.1.6 and Policy 5.1.1.7 requiring the County to provide coordinated and consolidated public services with the City of Webster and the City of Center Hill pursuant to an adopted Interlocal Service Boundary and Joint Planning Agreement.

**REVIEW COMMENTS**

FDOT has no comments on this amendment.

**RECOMMENDATIONS**

FDOT has no recommendations for this amendment.

---

<b>FDOT Contact:</b>	John Moore, E.I., Systems Planner FDOT District 5	<b>Reviewed by:</b>	Cade Braud, P.E., & Kelly Blume, P.E. Kittelson & Associates, Inc.
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An Equal Opportunity Employer

# Southwest Florida Water Management District

2379 Broad Street, Brooksville, Florida 34604-6899

(352) 796-7211 or 1-800-423-1476 (FL only)

TDD only: 1-800-231-6103 (FL only)

On the Internet at [WaterMatters.org](http://WaterMatters.org)

**Bartow Service Office**  
170 Century Boulevard  
Bartow, Florida 33830-7700  
(863) 534-1448 or  
1-800-492-7862 (FL only)

**Sarasota Service Office**  
6750 Fruitville Road  
Sarasota, Florida 34240-9711  
(941) 377-3722 or  
1-800-320-3503 (FL only)

**Tampa Service Office**  
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- Ronald E. Oakley**  
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- Maritza Rovira-Forino**  
Hillsborough
- David L. Moore**  
Executive Director
- William S. Blenky**  
General Counsel

September 2, 2010

D. Ray Eubanks, Administrator  
Plan Review and Processing  
Florida Department of Community Affairs  
2555 Shumard Oak Boulevard  
Tallahassee, Florida 32399-2100

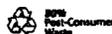
Subject: Sumter County 10-1 Proposed Comprehensive Plan Amendments

Dear Mr. Eubanks:

In accordance with Chapter 163, Florida Statutes, the staff of the Southwest Florida Water Management District has reviewed the above-referenced amendment package for Sumter County. Amendment CP-A2010-0001 proposes a change in land use designation from Agricultural to Industrial on the Sumter County Future Land Use Map (FLUM) for an approximate 2,866-acre site located in central Sumter County. The proposed amendment site is bounded on the north by Florida's Turnpike, on the east by U.S. Highway 301, on the west by Interstate 75 and on the south by the City of Coleman. The amendment would allow for the development of up to 16,335,000 square feet of industrial uses. With respect to the proposed amendment, the District offers the following comments:

### General Comments

1. The text materials cite three different acreages for the lands subject to the proposed FLUM change. The staff report references the amendment site as being 2,866 acres, yet later cites acreage of 3,266. A third reference in the amendment materials, the Sumter County Comprehensive Plan Amendment Application, notes the subject site as 2,975 acres. The included property survey depicts 3,266 acres; however, this includes parcels north of Florida's Turnpike that are not part of this amendment application. The specific acreage of the property subject to the proposed FLUM amendment should be clearly identified.



2. The types and location of the Industrial uses proposed as part of this FLUM amendment are not identified within the amendment materials. The Sumter County Future Land Use Element (FLUE) defines the Industrial category to include, but not be limited to, such uses as light and heavy manufacturing, repair, fabrication or processing facilities, and concrete or asphalt plants. Some of these Industrial uses may not be compatible given the extensive environmental constraints found on the site, including extensive wetlands, hydric soils and karst geology. As part of the County's Planned Unit Development process, limitations should be placed on the type and intensity of Industrial uses allowed on the amendment site. In addition, appropriate site planning should be completed that directs more intense Industrial uses away from the environmental features within and adjacent to the amendment site, and provides adequate protection and buffering of these resources.
3. Exhibit E of the amendment materials includes a consistency analysis of the proposed amendment with the policies of the Sumter County Comprehensive Plan's FLUE. The analysis provided under the cited Hazardous Wastes policies indicates that no hazardous wastes will be generated on the amendment site. As noted in the above comment, no specific limitations on the types of Industrial uses allowable are proposed as part of this amendment. At least a few of the uses indicated under the Industrial designation provided in the FLUE could be expected to generate and require disposal of some level of hazardous wastes. An explanation of how it was determined that no hazardous wastes would be generated by the proposed Industrial uses, or what limitations will be implemented to preclude their generation, should be provided.
4. As part of the FLUM amendment, a change is proposed to Policy 7.1.16.1 of the Sumter County Comprehensive Plan's FLUE. Policy 7.1.16.1 currently requires the completion of Sector Plan studies for all Development of Regional Impact (DRI) projects. The changes proposed would require Sector Plans only for those DRIs that contain more than 750 residential units, thereby reducing the applicability and intent of Sumter County's Sector Plan process outlined in the subsequent FLUE policies. Further clarification should be provided on Sumter County's intent to exclude non-residential DRI projects from the Sector Plan process.
5. Proposed Policy 7.1.2.19(g), addressing the protection of wetlands and related buffers, also provides for the mitigation of unavoidable wetland and/or wetland buffer impacts. The last sentence of the proposed policy is confusing, however, as it states "... impacted or isolated wetlands may be enhanced or restored as part of water resource development or an approved alternative water supply project." It is unclear how proposed wetland impact mitigation related to site development activities would be associated with development of water supply sources. Further, no mention is made in the amendment materials regarding the development of on-site traditional or alternative water supplies. An explanation clarifying the intent of the last sentence in proposed Policy 7.1.2.19(g) should be provided.
6. A portion of the amendment site west of I-75 is located adjacent to the District's Lake Panasoffkee tract. This property was purchased for the purpose of preserving and protecting the associated uplands, wetlands and tributaries of Lake Panasoffkee, a ranked

priority water body of the District's Surface Water Improvement and Management program. It should be noted that limited, periodic episodes of smoke, dust, noise or other effects may occur as a result of the District's ongoing land management activities conducted on the adjacent Lake Panasoffkee tract. Any Industrial uses proposed for development on those lands west of I-75 should be advised of the adjacent land management activities.

#### Soils

7. The proposed amendment site contains broad areas of soils identified by the United States Department of Agriculture's Natural Resources Conservation Service as being inundated or exhibiting high water table conditions during some portion of each year. These soils include, but are not limited to, Nittaw muck, Tarrytown sandy clay loam, Floridana mucky fine sand, EauGallie fine sand and Paisley fine sand. Many of these soils are also located in conjunction with extensive wetlands found on the site. These soils have moderate to severe limitations for the type of development proposed.

#### Wetland Protection

8. Wetlands contained on the amendment site are designated as Outstanding Florida Waters in association with the Withlacoochee Riverine and Lake System under Rule 62-700(9)(i), Florida Administrative Code. Stormwater management systems on the amendment site that propose discharge to these features will be required to provide greater water quality treatment and be subject to other limitations on potential impacts to these features pursuant to the Environmental Resource Permit process. For further information on this topic, please contact Albert Gagne, Environmental Manager, in the District's Brooksville Regulation Office at (352) 796-7211, extension 4352.

#### Water Quality

9. The proposed amendment site is located within an area of moderate (one to ten inches per year) recharge to the Floridan aquifer and contains extensive wetlands associated with surface water tributaries to Lake Panasoffkee. Preliminary results of pollutant loading models for the region indicate that development of the size and intensity proposed by this amendment may significantly increase runoff from the site. Based on this modeling, post-development runoff to Lake Panasoffkee from the proposed amendment site, which constitutes approximately seven percent of the Lake Panasoffkee watershed, could increase by up to 93 percent. Prior to development, consideration should be given to the design of the stormwater management system to include adequate runoff attenuation and treatment for protection of groundwater and surface water resources. A variety of measures for the protection of water quality are recommended for the proposed amendment site, including: incorporation of Low Impact Development practices, use of Florida-Friendly Landscaping™ principles, provisions for use of stormwater and/or reclaimed wastewater for non-potable irrigation, and stormwater management system design providing the highest practical level of water quality treatment.

10. In addition to overall water quality and stormwater runoff considerations, results of the preliminary loading models suggest that the proposed amendment site would result in a higher contribution of nutrients to Lake Panasoffkee and, subsequently, the Withlacoochee River. Lake Panasoffkee is a priority water body with the District's Surface Water Improvement and Management (SWIM) for which Total Maximum Daily Load (TMDL) levels have been established. Based on the preliminary modeling, significant potential increases in nutrient loading to the above water bodies could result. These increases would be due in part to the reduction in nutrient uptake from reduced natural vegetation on the site, the transport of these nutrients due to increased runoff, and landscape design and management practices.
11. Analysis of the geology and hydrogeology of the proposed amendment site, what aquifers are present, and the general direction of groundwater flow is not provided. A historical spring location is present in the northeast corner of the property as depicted on the U.S. Geological Survey 1:24,000 Wildwood topographic quadrangle map. The text provides no consideration of the underlying karst terrain encompassing the entirety of the proposed amendment site. Limestone bedrock is expected to be very close or possibly exposed at land surface, and thinly covered by soils across most of the site, with the top of limestone being the top of the Upper Floridan aquifer. Groundwater levels are typically near-surface (ten feet or less) and the lack of any substantial thickness of natural confining materials, i.e. clay beds, renders groundwater highly susceptible to contamination. The near-surface limestone across the proposed amendment site represents an active karst terrain with an intimate connection between surface water features, wetlands, and the Upper Floridan aquifer.

#### Surface Water Management

12. As noted in the previous comment under Soils, the amendment site contains broad areas of soils that are inundated or exhibit high water table conditions during some portion of each year, many in conjunction with the extensive wetlands found on the site. In addition, the amendment site overlies a region of relatively unconfined limestone geology prone to dissolution activity. Given these conditions, it will be important for the site's stormwater management system to be designed and constructed to adequately address the soils and geology as part of the Environmental Resource Permit (ERP) that would be required for the proposed commercial project. Prior to any development on the amendment site, it is recommended that an ERP pre-application meeting be scheduled with Monte Ritter, P.E., Surface Water Regulation Manager, in the District's Brooksville Regulation Office at (352) 796-7211, extension 4351.
13. The use of Low Impact Development (LID) techniques for the stormwater system design should be considered to enhance water quality management on the site. LID techniques are being incorporated into the draft Statewide Stormwater Treatment Rule currently under development by the Florida Department of Environmental Protection (FDEP). This rule, when adopted, will require Environmental Resource Permit applicants to meet site design

criteria that addresses nutrient loading from stormwater discharges. Some LID techniques contained in the draft rule include, but are not limited to the following:

- Swales
- Vegetated Natural Buffers
- Pervious Pavement Systems
- Green Roof/Cistern Systems
- Managed Aquatic Plant Systems
- Stormwater Harvesting
- Wetland Stormwater Treatment Trains

For reference, the draft FDEP Rule and associated Applicant's Handbook are available on the FDEP website at:

<http://www.dep.state.fl.us/water/wetlands/erp/rules/stormwater/index.htm>

#### Water Supply and Wastewater Management

14. The amendment materials include correspondence from the City of Wildwood indicating their intent to provide service for the proposed 0.67 million gallons per day of water demands generated by the proposed Industrial uses. The amendment materials do not, however, provide specific data and analysis of the projected potable and non-potable water demands for the proposed Industrial uses. Further analysis of potable and non-potable water demand for these Industrial uses should be provided as part of the amendment.
15. Exhibit E of the amendment materials includes a consistency analysis of the proposed amendment with the policies of the Sumter County Comprehensive Plan's Utilities Element. The analysis provided under the Potable Water policies indicates that buildings proposed for development under the proposed Industrial designation would incorporate water conserving plumbing fixtures "where feasible and applicable." It should be noted that the Florida Building Code requires the installation of water conserving plumbing fixtures for all new construction. The consistency analysis also indicates that "xeriscape" principles will be incorporated into the landscape plans "wherever practical." Water conserving landscape practices should be required to be incorporated throughout the proposed amendment site. The current Florida-Friendly Landscaping™ program expands upon the earlier Xeriscape™ principles and provides a practical assortment of water conserving practices that can be incorporated into most landscape designs. Information on Florida-Friendly Landscaping™ can be found at: <http://www.floridayards.org>
16. It is recognized that the City of Wildwood is the intended provider of wastewater collection and disposal service for the amendment site and that such services are anticipated to be provided concurrent with any proposed development of the site. Correspondence from the City of Wildwood indicates sufficient capacity to serve the projected wastewater flows of 0.56 million gallons per day for the proposed Industrial uses. It should be noted that should these services not be available at time of development, use of on-site treatment and disposal systems (septic tanks) should be precluded or limited. Soils on the amendment site

D. Ray Eubanks  
September 2, 2010  
Page 6

exhibit severe limitations for these systems due to their high water table conditions or periods of inundation and their use in such conditions could cause degradation to surface water and/or groundwater resources.

The District appreciates the opportunity to participate in the comprehensive plan amendment review process. Please do not hesitate to contact me at 352-796-7211, extension 4421, should you have any questions or if I may be of further assistance.

Sincerely,



Joseph P. Quinn, AICP  
Staff Planner

cc: Brad Cornelius, AICP, Sumter County  
Jim Quinn, FDEP  
Robin Branda, FDEP  
Veronica Crow, PRJ  
Monte Ritter, REG-BRO  
Al Gagne, REG-BRO  
Chuck Lane, LND  
David DeWitt, RDR-BRO  
Cara Martin, CLA

**BDA**  
ENVIRONMENTAL CONSULTANTS

October 11, 2010  
File: 2010-034-10.1

***SENT VIA FEDERAL EXPRESS***

Mr. Brad Cornelius, AICP  
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910 N. Main St., Suite 301  
Bushnell, Florida 33513  
Phone: (352) 793-0270  
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Brad.cornelius@sumtercountyfl.gov

RE: Response to Objections, Recommendations and Comments Report  
Comprehensive Plan Amendment for Sumter County DCA Number 10-1  
Monarch Industrial Park  
Sumter County, Florida

Dear Mr. Cornelius:

In response to the Objections, Recommendations and Comments (ORC) report, addressed to The Honorable Doug Gilpin dated September 24, 2010, Breedlove, Dennis and Associates, Inc. (BDA) has prepared the enclosed information. The exact language from the ORC report is restated herein in bold and the responses or reference to the appropriate information follows each request.

**Request No. I.A.1: Inconsistent Data and Analysis: Included in the amendment are three different acreages for the lands subject to the proposed FLUM change. The staff report indicates 2,688 acres, yet later cites 3,266 acres, and a third reference in the data and analysis notes 2,975 acres. Thus, it is unclear what the exact size of the land area for which the amendment is proposed.**

**Additionally, the data and analysis states there are approximately 1,100 acres of wetlands or inaccessible preservation areas. However, the data and analysis in the environmental assessment of the site shows on Figure 2.1-1 that 1,312 acres are wetlands. Thus, the analysis has not provided**

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BREEDLOVE, DENNIS & ASSOCIATES, INC.

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**accurate documentation of the extent of wetlands on the site.**

**Authority: Section 163.3177(2) and (6)(a), F.S., and Rules 9J-5.005(2) and (5); 9J-5.006(2)(b) and (c), F.A.C.**

***Recommendation:* Provide the exact acreage of the proposed Future Land Use Map Amendment site. Also, provide the amount of acreages of wetlands on the subject site and if some of the site is already designated preservation show this amount as well. The data and analysis should identify types, sizes, values, functions, conditions and locations for the wetlands on site. Also, the data and analysis should classify the wetlands consistent with the classes of wetlands established in the County's Comprehensive Plan.**

**Response:**

The Monarch Industrial Park (MIP) project is 2,865.51 acres (2,866 acres) and consists of a Central parcel (east of Interstate 75 [I-75]) and West parcel (west of I-75) (Exhibit 1). The current land use designation for the MIP site is Agriculture; there are no preservation areas or Conservation designations on the site. The land owner's environmental consultant (Breedlove, Dennis & Associates, Inc. [BDA]) has identified 123 wetlands and one surface water on the MIP site based on site reviews (groundtruthing) and aerial photo-interpretation. Wetlands and surface waters will be delineated, in accordance with Policy 3.1.4.7, prior to MIP site development in accordance with Policy 3.1.4.6. The number and acreages of wetlands and surface waters will be finalized following reviews by the regulatory agencies (Policy 3.1.4.8). The approximate acreage of wetlands on the MIP site is 1,571.95 acres, and the surface water is 13.36 acres.

Based on the site reviews, BDA has classified the wetlands and surface water in accordance with Florida Land Use, Cover and Forms Classification System (FLUCFCS)<sup>1</sup>, which has standardized descriptions of land use types. These cover types are identified on Exhibit 1 for each wetland and on Table 1. In addition, Sumter County classifies wetlands, under Policy 3.1.4.1, as follows:

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<sup>1</sup> Florida Department of Transportation (FDOT), 1999. Florida Land Use, Cover and Forms Classification System Handbook, Third Edition. Surveying and Mapping Office, Geographic Mapping Section.

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*Category I* wetlands refers to any wetland located in the area designated Conservation on the Sumter County Future Land Use Map (FLUM).

*Category II* wetlands are those wetland areas, which are not Category I and which meet at least one of the following criteria:

- (a) Any wetland of any size that has a direct hydrological connection to natural surface water bodies greater than 500 acres or to the Floridan aquifer; or
- (b) Any large isolated uninterrupted wetland one hundred acres or larger; or
- (c) Any wetland of any size that contains nesting federal and/or state listed threatened or endangered species.

*Category III* wetlands are those wetland areas, which meet any of the following criteria:

- (a) Consist of isolated wetlands and are five acres or more; or
- (b) Are less than 100 acres and do not otherwise qualify as a Category II wetlands.

*Category IV* wetlands are areas that meet all of the following criteria:

- (a) Isolated wetlands less than five (5) acres; and
- (b) Do not otherwise qualify as a Category I, II or III wetlands.

*Category V* wetlands are areas that meet all of the following criteria:

- (a) Are less than 0.5 acre;
- (b) Are isolated; and

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(c) Do not contain any nests of threatened or endangered wildlife species.

There are no designated Conservation areas on the Sumter County FLUM for the MIP site, and, therefore, no Category I wetlands on the MIP site. The on-site wetlands have been classified according to Policy 3.1.4.1 and are presented on Table 1. There are no known nests of Threatened or Endangered (T&E) wildlife species in the on-site wetlands, therefore T&E species were not a factor in determining the Category.

In addition to the type (FLUCFCS and Category) and size (approximate acreage), Table 1 provides general values and functions of the wetlands and surface water. Prior to development, the wetlands will be assessed for current quantitative value and function. Table 1 provides the best available site data as general, qualitative values and functions for the wetlands on the MIP site.

Overall, the condition of the wetlands is generally poor to moderate due primarily to historic and ongoing agricultural impacts (e.g., cattle utilization, field roadways, and nuisance species encroachment); the condition of the wetlands will be assessed in more detail prior to development.

General wetland and surface water locations are listed on Table 1. The specific locations by identification number for the wetlands and surface water are depicted on Exhibit 1.

**Request No. I.A.2:** *Environmental Suitability:* **The proposed amendment designates 2,688 acres as Industrial. The current Future Land Use Map designation is Agriculture with a maximum density of one unit per ten acres. The proposed amendment will increase development potential of the site to 16,355,000 square feet of industrial uses limited by a proposed site specific policy.**

**Based on the data and analysis provided the amendment site is not environmentally suitable for the types and intensities of the proposed land uses. Nearly 50% of the site is wetland systems connected to Lake Panasoffkee, an Outstanding Florida Waterway (OFW). Allowing 16,355,000 square feet of industrial uses to locate on this site will increase runoff in the area**

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and introduce hazardous substances into the surface and underground water of the area including Lake Panasoffkee an OFW. Pursuant to 163.3177(6)(a), F.S., and Rule 9-J5.006(3)(b)1, F.A.C., the future land use plan must be coordinated with the environmental conditions of the site. The proposed amendment has not been demonstrated to be consistent with this requirement of state law. The Southwest Florida Water Management District purchased a property adjacent to this site with the purpose of preserving and protecting the associated uplands, wetlands, and tributaries of Lake Panasoffkee. It has not been demonstrated that the proposed industrial uses will be compatible with the adjacent lands and ensure the protection of the natural resources of the area.

Proposed Policy 7.1.2.19(g) states that all activities within the Monarch Industrial Park shall be planned to avoid adverse impacts to wetlands and the required buffers as described in Policies 3.1.4-3.1.4.13 of the Conservation Element. While, the referenced conservation policies outline 5 different classes of wetlands and how each of these classes will be protected, the proposed amendment does not classify the onsite wetlands into the categories of the plan policies and does not show how they will be protected.

Further, the proposed amendment is inconsistent the following policies of the Comprehensive Plan:

Future Land Use Element Policy 7.1.2.16 which states that *industrial locations shall be provided along railroad corridors and the 1-75 corridor (especially near interchanges) on site that have no environmental constraint, because the site for the amendment has environmental constraints.*

Future Land Use Element Objective 7.1.10 which states that *Sumter County shall preserve and conserve unique and environmentally sensitive lands and resources from development or development impacts* because by designating the site for industrial use the County is not conserving and protecting unique environmentally sensitive lands and resources from the impacts of development.

Conservation Element Policy 3.1.6.7 requires the County to *seek methods to*

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*identify and restrict inappropriate development to enhance the natural systems on the southwest side of Lake Panasoffkee. By designating the site for industrial use the amendment is not consistent with the protection of Lake Panasoffkee.*

Pursuant to Rule 9J-5.013(3)(b), F.A.C., incompatible land uses are to be directed away from wetlands. The proposed amendment does not ensure that incompatible land uses will be directed away from the large number of wetlands on the site.

**Authority-** Sections 163.3161(3) and (5); 163.3177(2), (6)(a), (c), and (d), (8), and (10); 163.3187(2), F.S.; Rules 9J-5.005(2), (5), and (6); 9J-5.006(1), (2)(a) and (b), (3)(b) 1 and 4, (3)(c)1 and 6; and 9J-5.013(1), (2)(c)b, and (3), F.A.C.

***Recommendation:*** Based on the information provided with the amendment the majority of the site is not suitable for industrial development as proposed in this amendment. In view of this, the Department recommends that the County not adopt the amendment. Alternatively, the County may identify the most suitable portion of the site in the vicinity of existing roadways and infrastructure that will have the least impact on natural resources for industrial use, and designate the remainder of the site Conservation. By designating only a portion of the site for industrial use and designating the remainder for conservation use the County would be directing incompatible land uses away from wetlands as required by State law. The Conservation portion of the site should be placed into a permanent conservation easement at the time of amendment adoption. The County may need to create a new Conservation Future Land Use category or revise the existing category to achieve this because the existing Conservation category is reserved only for publicly owned lands.

**Response:**

*Wetlands:* As clarified in the Response to Request I.A.1., the total acreage of the MIP is 2,866 acres, and the approximate wetland acreage is 1,572 acres. The Applicant *assumed* that approximately 50% of the MIP site was wetlands thereby limiting the development entitlements. Based on the estimated acreages, the coverage of wetlands on the site is 54.8%. Not all wetlands on the MIP site are designated as Outstanding Florida Waters (OFW).

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*Outstanding Florida Waters:* According to the Florida Department of Environmental Protection (FDEP), a portion of the wetlands on the MIP site are designated as OFW in association with the Withlatchoochee Riverine and Lake System under 62-302.700(9)(i) Florida Administrative Code (F.A.C.). The extent of the OFW wetlands is unknown at this time since a delineation of the wetlands and surface waters has not been undertaken nor approved by Southwest Florida Water Management District (SWFWMD) or FDEP. However, the approximate extent of OFW wetlands is represented on Exhibit 2 based on the FDEP GeoData Directory<sup>2</sup>. Of the on-site wetlands, 470.0 acres are mapped as the approximate extent of OFW wetlands (Exhibit 2 and Table 1), or 16%, well less than 50% of the wetlands on the MIP site. These wetlands are located primarily in the northwest portion of the MIP site; development of MIP will be directed away from the OFW wetlands. All wetlands and surface waters will be delineated and surveyed prior to final site plan approval in accordance with Policies 3.1.4.6, 3.1.4.7 and 3.1.4.13.

*Runoff and Hazardous Materials:* MIP will comply with all local, State and Federal regulations to manage stormwater runoff, and there will be no adverse impacts due to runoff (per Sumter County Policies 3.1.3.2, 3.1.6.6 [if applicable], 4.4.1.1-4.4.1.4, and 7.1.10.2, and SWFWMD Basis of Review [BOR] Sections 2.8.3 and 4.0). Specific details of runoff volume will be addressed through the Development Order and Environmental Resource Permit (ERP) process. For areas with significant impervious areas, SFWMD BOR Section 6.6 would also apply.

Under Exhibit E of the July 20, 2010, *Sumter County Large Scale Amendment Transmittal, First Cycle 2010*, it was specifically stated that no hazardous waste will be generated on-site; the MIP site will comply with Objective 7.1.15 and associated Policies. It is not anticipated that the MIP will store, use, produce, or have present hazardous materials; in particular, hazardous materials in an amount at or above the thresholds established by U.S. Congress under Title III/Emergency Planning and Community Right-To-Know Act (EPCRA) and the corresponding legislation by State of Florida under the Florida Hazardous Materials Emergency Response and Community Right-To-Know Act. Sumter

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<sup>2</sup> Florida Department of Environmental Protection GeoData Directory: <http://www.dep.state.fl.us/gis/datadir.htm>

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County is part of the District 5 Local Emergency Planning Committee (LEPC) established to, in part, assist with regional coordination and help public and emergency responders address hazardous materials public safety issues. The District 5 LEPC works with the Withlacoochee Regional Planning Council (RPC), with funding provided from the Department of Community Affairs, to prepare regional plans for hazardous materials stored, used, produced, or present at or above the established thresholds. MIP will comply with the federal and state Acts and will coordinate with District 5 LEPC and Withlacoochee RPC, as necessary. In addition, please be aware that Sumter County authorizes large quantity generators and operations for storage, transfer, and disposal of hazardous waste under conditional uses in the industrial land use (Policy 7.1.15.1 and 7.1.15.2).

*Adjacent SWFWMD Property:* The referenced property is the SWFWMD recreation site called Lake Panasoffkee. Only the MIP parcels west of I-75 (West parcel) are adjacent to the Lake Panasoffkee recreation site. MIP site activities will be consistent with SWFWMD's land management activities on the adjacent lands to ensure no conflicts with SWFWMD land management activities. The Comprehensive Plan recommends various design techniques such as buffering, screening and open spaces be considered to assure the compatible transition between differing land uses and zoning districts (Policy 7.1.6.4).

*Proposed Policy 7.1.2.19(g) and Wetland Categories:* The Conservation Element classifies wetlands according to the following (Policy 3.1.4.1):

*Category I* wetlands refers to any wetland located in the area designated Conservation on the Sumter County Future Land Use Map.

*Category II* wetlands are those wetland areas, which are not Category I and which meet at least one of the following criteria:

- (a) Any wetland of any size that has a direct hydrological connection to natural surface water bodies greater than 500 acres or to the Floridan aquifer; or

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- (b) Any large isolated uninterrupted wetland one hundred acres or larger; or
- (c) Any wetland of any size that contains nesting federal and/or state listed threatened or endangered species.

*Category III* wetlands are those wetland areas which meet any of the following criteria:

- (a) Consist of isolated wetlands and are five acres or more; or
- (b) Are less than 100 acres and do not otherwise qualify as a Category II wetlands.

*Category IV* wetlands are areas that meet all of the following criteria:

- (a) Isolated wetlands less than five (5) acres; and
- (b) Do not otherwise qualify as a Category I, II or III wetlands.

*Category V* wetlands are areas that meet all of the following criteria:

- (a) Are less than 0.5 acre;
- (b) Are isolated; and
- (c) Do not contain any nests of threatened or endangered wildlife species.

There are no wetlands designated Conservation on the Sumter County FLUM and therefore no Category I wetlands on the MIP site. The on-site wetlands have been classified according to Policy 3.1.4.1 and are presented on Table 1. These designations may change once the delineation is performed and approved by SWFWMD or FDEP. Exhibit 1 provides the wetland or surface water identification numbers and Table 1 provides the classification Category per Policy 3.1.4.1.

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Removal, alteration, and/or encroachment within Category I wetlands is not permitted, except for enhancement or restoration-type activities (Policy 3.1.4.2). Removal, alteration, and/or encroachment of other Categories of wetlands are allowed per the Sumter County Comprehensive Plan Conservation Element, as acceptable under SWFWMD or FDEP regulations and requirements (Policies 3.1.4.3, 3.1.4.4, 3.1.4.5.). MIP will be planned to direct development away from the OFWs and to avoid or minimize wetland impacts in compliance with SWFWMD regulations (SWFWMD BOR Section 3.2.1). Mitigation will be provided to offset wetland impacts remaining after elimination and reduction have been addressed (Policies 3.1.4.3, 3.1.4.4, 3.1.4.9[3], and 3.1.4.10[2]; SWFWMS BOR Sections 3.2.1 and 3.3).

*Inconsistencies with Comprehensive Plan:* Each Policy or Objective, as cited in the OCR Report, is restated in its entirety here to more fully address consistency with the Comprehensive Plan:

*Policy 7.1.2.16. Industrial locations shall be provided along railroad corridors and the I-75 corridor (especially near interchange locations) on sites that have no environmental constraints or have provided mitigation for those constraints through existing or proposed public services and utilities. Other locations may be considered for industrial uses upon a showing of suitability and need.*

The MIP site does contain wetlands, which can be an environmental constraint, however, as stated in the OCR Report. As provided for in Policy 7.1.2.16, mitigation for those wetlands constraints can be addressed through wetland mitigation as necessary and in accordance with agency requirements.

Additional mitigation for transportation related constraints can be mitigated by:

- proportionate share, impact fees, and private-public partnerships for traffic improvements;
- rail transportation via the CSX-S line to reduce project related traffic on the roadways.

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These mitigation measures demonstrate compliance with Policy 7.1.2.16 and, therefore, with the Comprehensive Plan.

*Objective 7.1.10 Sumter County shall preserve and conserve unique and environmentally sensitive lands and resources from development or developmental impacts. The County shall maintain land development regulations to implement preservation and conservation during the land development process.*

The only “unique and environmentally sensitive lands” within the boundaries of the MIP site are any designated OFW wetlands. Other lands on the site are locally and regionally common. OFW wetlands are proposed to be conserved and all development will be directed away from these areas to prevent development-related impacts. Protection of the OFW wetlands conforms to Policy 7.1.10.1. As noted above, stormwater runoff will be managed on-site, conforming to Policy 7.1.10.2. Wildlife surveys were conducted, as included in Exhibit C of the July 20, 2010, *Sumter County Large Scale Amendment Transmittal, First Cycle 2010*, and protection measures will be implemented, if necessary, thereby complying with Policy 7.1.10.3<sup>3</sup>. Compliance with these Policies demonstrates consistency with Objective 7.1.10 and the Comprehensive Plan.

*Policy 3.1.6.7. The county will seek methods to identify and restrict inappropriate development to enhance the natural systems on the southwest side of the lake.*

The MIP site is located east-northeast of Lake Panasoffkee (the lake referenced in Policy 3.1.6.7). As such, this Policy does not apply to the proposed amendment and the MIP site is consistent with the Comprehensive Plan.

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<sup>3</sup> This is the assumed Policy number (7.1.10.3), since it is actually blank in the Land Use Element.

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*9J-5.013(3)(b) F.A.C. Future land uses which are incompatible with the protection and conservation of wetlands and wetland functions shall be directed away from wetlands. The type, intensity or density, extent, distribution and location of allowable land uses and the types, values, functions, sizes, conditions and locations of wetlands are land use factors which shall be considered when directing incompatible land uses away from wetlands. Land uses shall be distributed in a manner that minimizes the effect and impact on wetlands. The protection and conservation of wetlands by the direction of incompatible land uses away from wetlands shall occur in combination with other goals, objectives and policies in the comprehensive plan. Where incompatible land uses are allowed to occur, mitigation shall be considered as one means to compensate for loss of wetlands functions.*

The OFW wetlands are located primarily in the north-northwest portion of the MIP site. Industrial development will be directed away from these areas and other wetlands determined to be highly functional. In addition, mitigation will be provided to compensate for loss of other wetlands that cannot be avoided. Therefore, the proposed ammendment complies with 9J-5.013(3)(b) F.A.C. and the Comprehensive Plan.

*Recommendation Response:* Approximately 45% ( $\pm$  1, 281 acres) of the MIP site is uplands suitable for development. With the proposed planning, including directing development away from the most sensitive wetlands and using buffers around the wetlands, the MIP will have minimal impacts on the natural resources. In addition, the use of buffers assures “the compatible transition between differing land uses” under Policy 7.1.6.4.

All development on MIP will be in compliance with state and federal law by obtaining all required permits from the regulatory agencies.

There are no designated Conservation areas on the MIP site under the existing FLUM and, therefore, there is no area to be placed into a conservation easement. However, development will be directed away from OFW wetlands, and, once the extent of the OWF wetlands is

**BDA**  
ENVIRONMENTAL CONSULTANTS

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determined, these wetlands will be placed into a perpetual conservation easement. Typically, this is done as part of the ERP process (SWFWMD BOR Section 3.3.8). In most cases, it is SWFWMD policy that a grantee other than SWFWMD accept the easement; since the OFW wetlands proposed for conservation are connected to SWFWMD lands, it is likely that SWFWMD will accept the easement. An appropriate grantee (or grantees) will be determined if SWFWMD will not accept the easement. If Sumter County prefers to be the grantee, then the current Conservation category would be an appropriate land use designation. Based on this, it would be premature to create a new Conservation Future Land Use category since both the extent of the conservation land and the recipient of the easement has not been determined.

We trust that the information provided herein is sufficient for your review. Should you have any questions regarding this information, or require additional information, please do not hesitate to contact our office.

Sincerely yours,



Jennifer L. Rosinski, Ph.D.  
Associate Scientist IV



W. Michael Dennis, Ph.D.  
President

JLR/WMD/tdm

Enclosures

cc: George Sola  
Heather Himes

**EXHIBIT 1**

**APPROXIMATE EXTENT OF WETLANDS AND SURFACE WATERS ON  
THE MONARCH INDUSTRIAL PARK PROJECT SITE**

**EXHIBIT 2**

**APPROXIMATE EXTENT OF OUTSTANDING FLORIDA WATERS ON  
THE MONARCH INDUSTRIAL PARK PROJECT SITE**

**TABLE 1**

**WETLANDS ON THE MONARCH INDUSTRIAL PARK  
PROJECT SITE, SUMTER COUNTY, FLORIDA**

**Table 1 Wetlands on the Monarch Industrial Park Project Site, Sumter County, Florida**

Wetland ID	FLUCFCS <sup>1</sup>	Size (acres)	OFW <sup>2</sup> (acres)	Category <sup>3</sup>	Value/Functions <sup>4</sup>	Location <sup>5</sup>
1 North	615	665.91	425.63	II	Water quality improvement, water storage/attenuation, wildlife habitat, food chain support	North and west areas of Central parcel
	620	4.40	N/A			
	641	2.86	N/A			
1 South	615	135.80	N/A	II	Water quality improvement, water storage/attenuation, wildlife habitat, food chain support	South central area of Central parcel
	641	9.20	N/A			
	643	5.33	N/A			
2	630	1.18	1.18	IV	Water storage, wildlife habitat	North, within Central parcel
3	630	2.08	Not Applicable (N/A)	IV	Water storage, wildlife habitat	Northwest portion of Central parcel
4	641	0.29	N/A	V	Water storage, wildlife habitat	
5	630	0.60	N/A	IV	Water storage, wildlife habitat	
6	641	0.25	N/A	V	Water storage	
7	630	0.89	N/A	IV	Water storage, wildlife habitat	
8	630	0.74	N/A	IV		
9	630	2.80	N/A	IV		
10	630	3.61	N/A	IV		
11	630	0.63	N/A	IV		
12	641	0.36	N/A	V	Water storage	
13	630	0.76	N/A	IV	Water storage, wildlife habitat	
14	630	1.75	N/A	IV		
15	641	4.40	N/A	IV		
16	641	4.25	N/A	IV	Water storage	West-southwest portion of Central parcel; east side of Interstate 75
17	641	0.29	N/A	V		
18	641	0.38	N/A	V		
19	643	1.27	N/A	IV	Water storage, wildlife habitat	

<sup>1</sup> Florida Land Use, Cover and Forms Classification System

- Streams and Lake Swamps (Bottomland) (615)
- Forested Wetlands (620)
- Wetland Forested Mixed (630)
- Freshwater Marsh (641)
- Wet Prairie (643)
- Reservoirs (530)

<sup>2</sup> OFW = Outstanding Florida Waters

<sup>3</sup> Per Sumter County Comprehensive Plan, Conservation Element Policy 3.1.4.1.

<sup>4</sup> These are general, qualitative values and functions. The quantitative value and function will be assessed prior to development of the site.

<sup>5</sup> Please also refer to the Exhibit 1, a map of wetland locations and approximate extent.

**Table 1 Continued**

Wetland ID	FLUCFCS <sup>1</sup>	Size (acres)	OFW <sup>2</sup> (acres)	Category <sup>3</sup>	Value/Functions <sup>4</sup>	Location <sup>5</sup>	
20	641	0.36	N/A	V	Water storage	Central Portion of Central parcel	
21	641	0.89	N/A	IV	Water storage, wildlife habitat		
22	641	0.21	N/A	V	Water storage		
23	641	0.26	N/A	V			
24	630	0.11	N/A	III	Water storage, water quality improvement, wildlife habitat		
	641	2.29	N/A				
	643	5.90	N/A				
25	630	3.28	N/A	III			
	641	6.21	N/A				
	643	1.50	N/A				
26	643	0.25	N/A	V	Water storage		
27	641	2.46	N/A	IV	Water storage, wildlife habitat		
28	641	0.98	N/A	IV			
	643	0.46	N/A				
29	643	0.23	N/A	V	Water storage		
30	630	12.34	N/A	III	Water storage, water quality improvement, wildlife habitat		
	643	2.46	N/A				
31	630	0.49	N/A	V			
32	630	0.90	N/A	IV			
33	630	2.67	N/A	IV			
34	630	0.62	N/A	IV			
35	643	0.61	N/A	IV			
36	630	7.20	N/A	III			
37	630	5.99	N/A	III			
38	630	2.54	N/A	IV			
39	630	2.73	N/A	IV			
40	630	4.07	N/A	IV			
41	630	4.97	N/A	IV			
42	630	4.62	N/A	IV			
43	630	3.34	N/A	IV			
44	630	10.49	N/A	III			
45	630	0.92	N/A	IV			
46	630	3.83	N/A	IV			
47	641	0.22	N/A	V		Water storage	Southeast portion of Central parcel
48	641	3.27	N/A	IV		Water storage, wildlife habitat	
49	641	0.97	N/A	IV			
50	641	1.15	N/A	IV			
51	641	2.24	N/A	IV			
52	630	2.85	N/A	IV			
	641	5.65	N/A	III			
53	641	0.63	N/A	IV	Water storage, wildlife habitat	East side of Central parcel	
54	641	0.28	N/A	V	Water storage		
55	630	20.72	N/A	III	Water storage, wildlife habitat		
56	641	0.77	N/A	IV			
57	641	1.16	N/A	IV			
58	630	5.58	N/A	III			

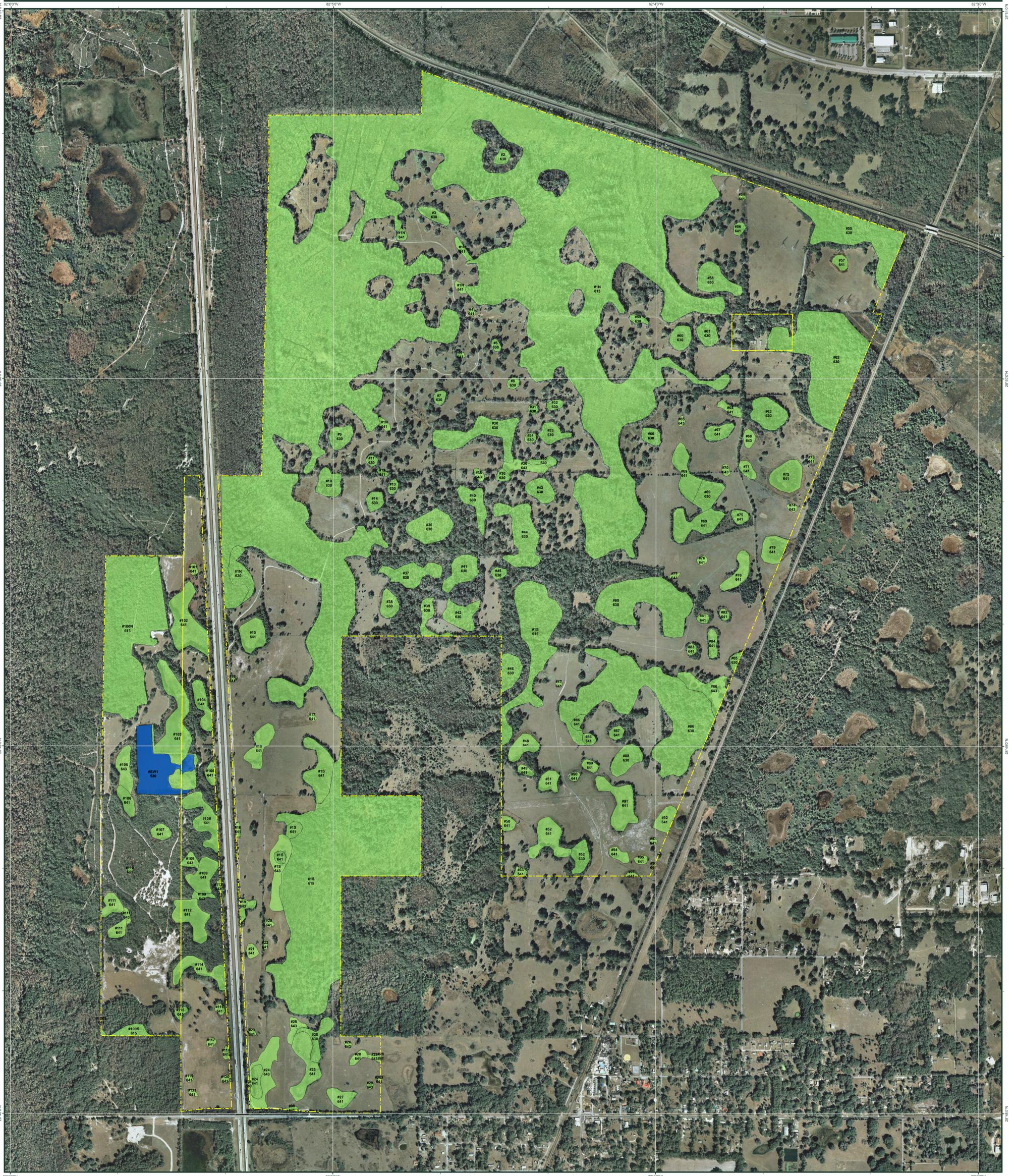
**Table 1 Continued**

Wetland ID	FLUCFCS <sup>1</sup>	Size (acres)	OFW <sup>2</sup> (acres)	Category <sup>3</sup>	Value/Functions <sup>4</sup>	Location <sup>5</sup>	
59	630	0.81	N/A	IV			
60	630	2.77	N/A	IV			
61	630	2.60	N/A	IV			
62	630	39.02	N/A	III			
63	630	5.63	N/A	III			
64	641	1.26	N/A	IV			
65	643	0.36	N/A	V	Water storage		
66	630	1.77	N/A	IV	Water storage, wildlife habitat		
67	641	2.36	N/A	IV			
68	643	1.11	N/A	IV			
69	630	3.85	N/A	III			
	641	11.69	N/A				
70	643	0.50	N/A	V			
71	641	1.37	N/A	IV			
72	641	5.22	N/A	III			
73	641	0.27	N/A	V	Water storage		
74	643	0.43	N/A	V	Water storage, wildlife habitat		
75	641	1.26	N/A	IV	Water storage		
76	641	0.46	N/A	V	Water storage, wildlife habitat		
77	643	0.27	N/A	V			
78	641	3.43	N/A	IV			
79	641	3.67	N/A	IV			
80	630	21.47	N/A	III			
81	641	0.62	N/A	IV		Water storage, wildlife habitat	
82	641	0.60	N/A	IV			
83	641	0.60	N/A	IV			
84	641	1.53	N/A	IV			
85	630	0.88	N/A	IV			
86	630	47.85	N/A	III			
	641	1.70	N/A				
	643	5.52	N/A				
87	641	1.05	N/A	IV			
88	630	4.10	N/A	IV			
89	641	0.97	N/A	IV			
90	641	0.50	N/A	V			
91	641	6.82	N/A	III			
92	641	2.48	N/A	IV			
93	641	0.25	N/A	V	Water storage		
94	641	1.33	N/A	IV	Water storage, wildlife habitat		
95	641	0.63	N/A	IV	Water storage		
96	641	0.04	N/A	V	Water storage		
97	641	0.29	N/A	V			
98	641	0.25	N/A	V	Water storage		West-southwest portion of Central parcel; east side of Interstate 75

**Table 1 Continued**

Wetland ID	FLUCFCS <sup>1</sup>	Size (acres)	OFW <sup>2</sup> (acres)	Category <sup>3</sup>	Value/Functions <sup>4</sup>	Location <sup>5</sup>
99	641	0.18	N/A	V	Water storage	
100 North	615	47.86	21.54	II	Water quality improvement, water storage/attenuation, wildlife habitat, food chain support	West parcel; west side of Interstate 75
100 South	615	2.23	N/A	II	Water quality improvement, water storage/attenuation, wildlife habitat, food chain support	
101	641	0.52	N/A	IV	Water storage, wildlife habitat	
102	641	10.09	N/A	III		
103	641	15.88	N/A	III		
104	641	3.59	N/A	IV		
105	641	1.15	N/A	IV		
106	641	2.09	N/A	III		
	643	3.45	N/A			
107	641	1.63	N/A	IV		
108	641	6.23	N/A	III		
109	641	4.51	N/A	IV		
110	641	0.17	N/A	IV		
	644	1.93	N/A			
111	641	3.73	N/A	IV		
	643	0.55	N/A			
112	641	6.11	N/A	III		
113	643	0.31	N/A	V	Water storage	
114	641	4.88	N/A	IV	Water storage, wildlife habitat	
115	643	0.70	N/A	IV		
116	641	0.53	N/A	IV	Water storage	
117	641	0.46	N/A	V		
118	641	0.45	N/A	V		
119	641	0.26	N/A	V		
120	641	0.30	N/A	V		
121	641	0.28	N/A	V		
201	630	0.03	N/A	V		
202	641	0.08	N/A	V		
SW1	530	13.35	N/A	N/A	Water storage, wildlife habitat	
<b>Total</b>	<b>---</b>	<b>1,585.31</b>	<b>470.0</b>	<b>---</b>	<b>---</b>	<b>---</b>

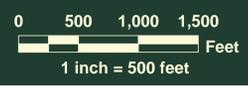
# EXHIBIT 1. APPROXIMATE EXTENT OF WETLANDS AND SURFACE WATERS ON THE MONARCH INDUSTRIAL PARK PROJECT SITE.



**Legend**

Project Boundary  
 Central (2,492.54 ac)  
 West (372.97 ac)

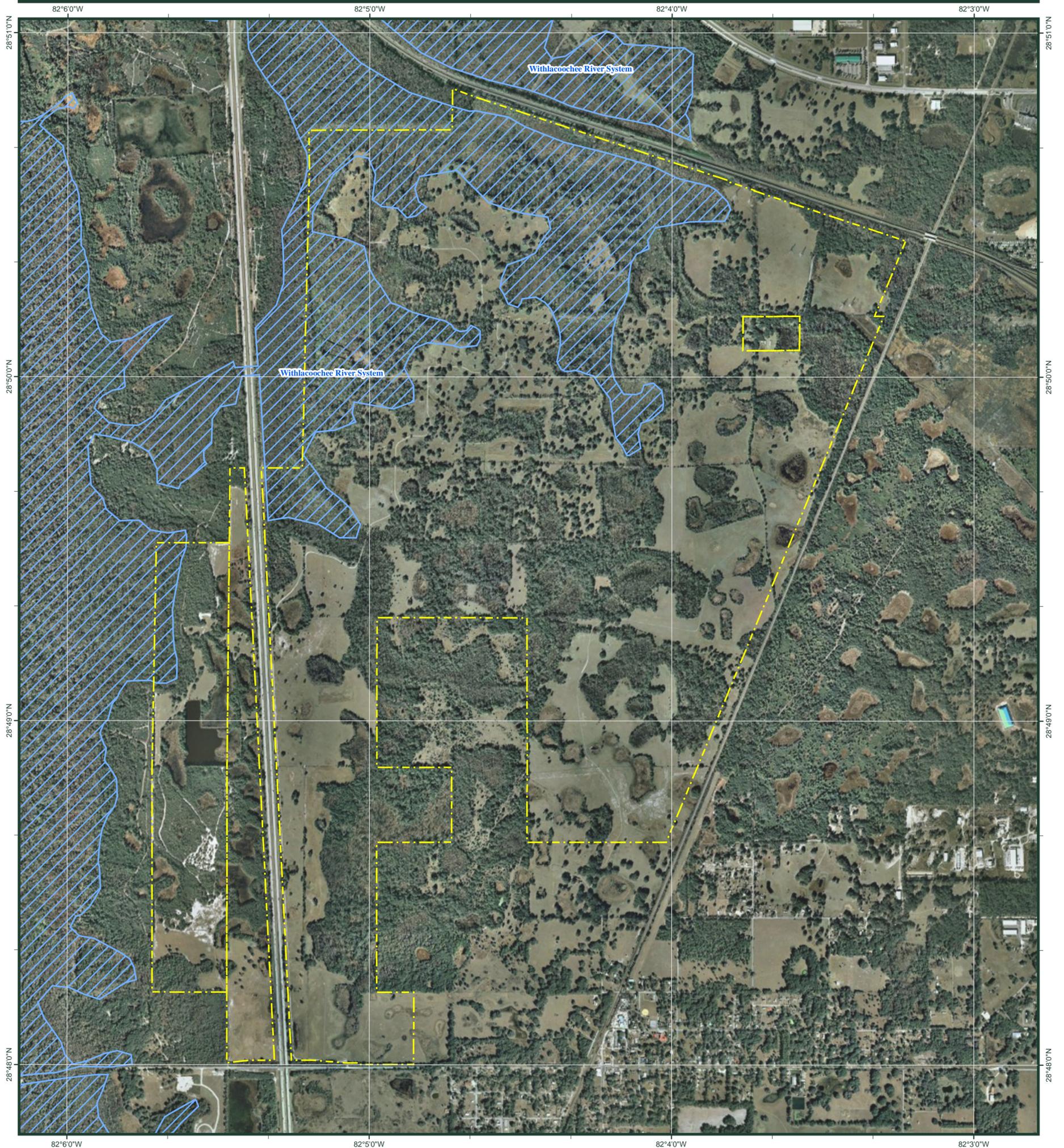
Wetlands  
 Surface Waters



**BDA** BREEDLOVE, DENNIS & ASSOCIATES, INC.  
 Environmental Consultants  
 330 W. Canton Ave., Winter Park, FL 32789 • 407-677-1882

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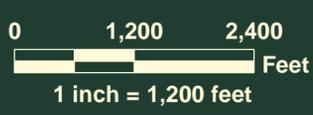
# EXHIBIT 2. APPROXIMATE EXTENT OF OUTSTANDING FLORIDA WATERS ON THE MONARCH INDUSTRIAL PARK PROJECT SITE.



**Legend**

**Project Boundary**

- Florida Dept of Environmental Projection (FDEP) proposed extent
- Central (2,492.54 ac)
- West (372.97 ac)



**BDA** BREEDLOVE, DENNIS & ASSOCIATES, INC.  
 Environmental Consultants  
 330 W. Canton Ave., Winter Park, FL 32789 • 407-677-1882



October 11, 2010

Mr. John P. Moore, EI  
Systems Planner  
Florida Department of Transportation – District 5  
Orlando Urban Office  
133 S Semoran Blvd  
Orlando, Florida 32807

**Re: Comprehensive Plan Amendment 10-01 – Monarch Ranch**  
Sumter County, Florida  
TPD № 4149

Dear Mr. Moore,

We offer the following responses to your comments. Each comment is listed first in **bold** typeface and the corresponding response in regular typeface.

**The traffic study incorrectly states that the maximum intensity under Industrial is a 0.25 FAR. The County comprehensive plan indicates that a 0.50 FAR is allowed inside the urban development area and a 0.30 FAR is allowed outside the urban development area. Use of a 0.25 FAR, however, is consistent with the proposed text amendment that limits development of the site.**

The traffic study is being revised and the statement will be revised accordingly. The maximum development density remains limited as accurately noted in the initial traffic study.

**The traffic study analyzes 2,600 acres. The FLUM amendment addresses 2,866 acres.**

The traffic study assumes that some wetland areas will not be suitable for development and were thereby excluded from the density calculation.

**The traffic study analyzes the proposed development scenario as High-Cube Warehouse. ITE's Industrial Park trip generation rates are a more appropriate match because the text amendment states that Monarch Industrial Park will include "a functional integration of industrial, warehousing, manufacturing, and supporting commercial and office uses" and will allow "all uses allowed in the industrial zoning category." Industrial Park trip generation rates are significantly higher than High-Cube Warehouse trip generation rates and are therefore more indicative of the maximum development scenario.**

The proposed use of this area is for regional distribution warehousing, which is best approximated by ITE's High-Cube Warehouse category. It is reasonable to assume, however, that parts of the property will

Mr. John P. Moore, E.I.  
Sumter County CPA 10-01  
October 11, 2010  
TPD No. 4149  
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include the allowable supporting uses as would normally be found in an Industrial Park. Therefore, for purposes of the transportation analysis, 20% of the total development will be assumed as Industrial Park per ITE. The revised transportation analysis will reflect the higher intensity development program.

**FDOT has adopted an LOS B standard for the Turnpike between I-75 and US 301.**

The revised analysis will reflect the adopted LOS for this segment of the Turnpike.

**Widening I-75 is not funded for construction within five years (per the June 23, 2010, Lake-Sumter MPO TIP), so it cannot be considered to be in place for the purposes of mitigating the impacts of the amendment under existing conditions or in the near term. Additionally, assuming that impacted I-75 segments will be re-classified from Rural to Transitioning is not a mitigation strategy. While FDOT acknowledges that area type could change as a result of the 2010 Census, this change has not occurred.**

It is understood that the widening of I-75 is not funded for construction in the near term. However, this project is on the regional list of priority projects for future improvement. Therefore, its use in the transportation analysis was based on the recognition that the proposed land use change is a long term development that would not be effected in the near term. However, if assumed in the near term, its impacts to the regional network would be offset by accompanying assumptions that the planned improvements, which are in part planned to accommodate projected growth in the area, will be in place to accommodate that growth.

**Adjustments to the model trip distribution pattern should be described in more detail.**

The distribution adjustments described in the transportation analysis were made to reassign traffic to the regional facilities, further underlining the regional distribution nature of the project. The adjustments will be further detailed in the revised analysis.

**The tables in Appendix A are not completely legible.**

The tables in the appendix were obtained from Sumter County's CMS. These can be provided electronically if necessary.

**The traffic study defers mitigation to the DRI process.**

The traffic study identifies and highlights the long term transportation needs for the area, including the need for the Coleman By-pass, improvements to Interstate-75 and the interchange on I-75 at Warm Springs Road. Sumter County has been coordinating with the Lake-Sumter MPO to include some of the needed transportation improvements in the long range needs plan in response to this land use change. Project specific mitigation and funding of the needed improvements is expected to occur with the application for a DRI, where the project's phasing and specific capacity needs can be further analyzed and assessed.

**Please revise the traffic study per the comments above. If the revised traffic study identifies a need for State roadway improvements, please identify the needed improvements. Needed near-term mitigation projects should be added to the five-year schedule of capital improvements. Needed long-term mitigation projects and/or strategies should be added to the Transportation and Capital Improvements Elements and coordinated with the LRTP. Please coordinate with adjacent local governments to ensure that the needed projects are reflected in those local governments' schedules and plans as necessary.**

The traffic analysis is being revised to address the FDOT's comments. Improvements needed to support

this land use amendment are being coordinated with the Lake-Sumter MPO and relevant agencies. Sumter County has consistently implemented a rigorous concurrency system that has successfully addressed specific infrastructure needs on local and state roads. Sumter County will continue to maintain its system and ensure that all development activities are concurrent with infrastructure as required by State Statutes and County Ordinances. The project's near term impact to those facilities will be the subject of further analysis as development occurs in the future. Impacts to state roads will be mitigated through binding proportionate-share and/or proportionate-fair share agreements, which will ensure that the project contributes to the necessary capacity improvements in the area.

Furthermore, the County has been coordinating, through the Lake-Sumter MPO the inclusion of needed transportation improvements in the Long Range Plan to support the proposed amendment. Such improvements include the Coleman by-pass road and the I-75 Interchange at Warm Springs Avenue, which will enhance transportation mobility in the area and alleviate traffic on US 301. Finally, Sumter County and the MPO will be coordinating with the FDOT in regard to the statewide freight study being undertaken to establish a long range plan for freight movements. The proposed distribution facility at this site was designated to the state for inclusion in the statewide analysis. The County and MPO will continue to work with the FDOT to ensure that the resulting recommendations are regionally and locally sensitive and that those recommendations are implemented as freight related development proceeds in the area.

**Regarding the future DRI intended for this site:**

- **Potential near- and long-term impacts of development of the site can be proactively addressed through the current FLUM amendment.**

The impacts of development are being proactively addressed through the Long Range Transportation Plan, the FDOT Freight Study, and the local concurrency management system. In addition to identifying needed transportation improvements, the County is actively seeking prioritization and funding for those improvements in the long term. Any proposed development on the property will also be subject to the requirements of Concurrency and DRIs, which specify that the project's phased impact are addressed and mitigated prior to approval. Therefore, this proactive approach of identifying needed infrastructure improvements and taking the steps to plan for their realization as the property develops will ensure that the project and the area are adequately served by the necessary transportation infrastructure in the future.

- **FDOT will review the DRI through the DRI process and will work with the developer and the County to develop mitigation agreements for impacted State roadways.**

It is understood and agreed that, as is required by DRI rules, the FDOT and all affected public agencies will review any development impacts resulting from the proposed DRI on State and local roads. The FDOT will be a party to any specific mitigation plans addressing State roadways.

- **In case the DRI does not move forward, the proposed text amendment for this site should be revised to include language to the effect that the land use designation of the site will revert to Agriculture if the DRI is abandoned.**

The text amendment for the site specifically prohibits development on this property to occur without the DRI process. Therefore, the property would remain agricultural in use if a DRI application is not submitted for the project.

Mr. John P. Moore, E.I.  
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We trust that the above adequately address your concerns. Please note that a revised analysis addressing the technical comments provided by the FDOT is being prepared for submittal in addition to the above response.

Regards,

Mohammed Abdallah, PE, PTOE.

CC: Mr. Brad Cornelius, AICP, Sumter County Planning Manager  
Ms. Cecelia Bonifay, Akerman Senterfit  
Ms. Heather Himes, Akerman Senterfit  
Mr. George Sola, Property Owner

**Ackerman Senterfitt & Edison, PA**

**Response to DCA ORC**

**Monarch Ranch**

**RESPONSE TO DCA OBJECTIONS, RECOMMENDATIONS AND  
COMMENTS REPORT/SUMTER COUNTY COMPREHENSIVE PLAN  
AMENDMENT 10-1**

**I. A. FLUM Amendment:**

**3. Potable Water and Wastewater:**

The Department has stated that the data and analysis for the Monarch Industrial Park does not provide specific amounts of potable, non-potable and wastewater demands for the proposed Industrial uses.

As stated in the Future Land Use Amendment Application, the Monarch Industrial Park is located within the utility service area for the City of Wildwood. Sumter County is not a provider of water, potable water or wastewater services, therefore, all utility services must be obtained from the City of Wildwood. In furtherance of the agreement for the provision of utility services, Sumter County and the City of Wildwood entered into an Interlocal Service Boundary and Joint Planning Agreement dated April 14, 2009.

Potable Water – In its letter of March 3, 2010, the City estimates the daily demand for the MIP to be .67 million gallons per day (MGD) at build out. The City owns and operates (5) water treatment plants which have a combined capacity of 4.752 MGD. Further, that the City is in the design stages of a new water treatment plan which will result in a capacity of 6.90 MGD and which should be operational in 2012. The combined capacity of all water treatment plants in 2012 therefore being 11.652 MGD. See the attached Table 1 from the City of Wildwood which depicts the current and projected capacity and addresses the LOS requirement.

Wastewater Service – In its letter of March 3, 2010, the City estimates the average daily demand for the MIP to be .56 MGD at build out. The City currently has available permitted treatment capacity of 3.55 MGD and effluent disposal capacity of 4.25 MGD. In addition, the City has initiated the design of a new wastewater treatment plant which will have a capacity of 3.0 MGD and is scheduled for completion between 2015-2020. See the attached Table 1 from the City of Wildwood which depicts the current and projected capacity and addresses the LOS requirement.

## **I. B. Proposed Text Amendments (FLUM)**

### **5. Inconsistent Provisions:**

- (1) The text of Proposed Policy 7.1.2.19 has been modified in Section g. to address OFW Wetlands.

Policy 7.1.2.19 – The Monarch Industrial Park (MIP) is located at the intersection of Interstate 75, the Florida Turnpike, State Road 44 and the CSX Railroad S-Line and development therein shall adhere to following standards:

- a. The MIP project is an Industrial Park that includes a functional integration of industrial, warehousing, manufacturing and supporting commercial and office uses. All uses allowed in the industrial zoning category shall be allowed in the MIP. Consistent with Policy 7.1.1.2(h) the MIP shall be implemented through PUD Planned Industrial zoning.
- b. The maximum industrial square footage within the amendment area shall not exceed 16,335,000 square feet of industrial uses, which equates to approximately a .25 FAR on the Net Buildable Acreage within the amendment area. For purposes of this Policy, Net Buildable Acreage shall mean total gross acreage less those wetlands on-site qualifying as jurisdictional wetlands as determined by the applicable regulatory review agency.
- c. Before any development can occur within the MIP, the proposed development must be processed and approved as a Development of Regional Impact (DRI), as defined in Chapter 380.06, Florida Statutes and Chapter 28-24, Florida Administrative Code, complying with all applicable financial feasibility and infrastructure requirements. Until said approval of a DRI for the MIP, land use density and intensity shall be restricted to 1 dwelling unit per 10 acres and other uses permitted by the Agricultural Land Use Designation.
- d. The MIP shall be developed in a manner to promote a transportation system, both on-site and off-site, consistent with the goals of providing mobility that is energy efficient includes green development principles and is financially feasible. The DRI for the MIP shall also identify the procedures for determining transportation needs, identifying funding mechanisms, the protection of transportation corridors and the monitoring of transportation impacts.

- e. The MIP shall implement the concept of transportation mobility in all aspects of the transportation network design. This emphasis is consistent with the concepts of reduced energy requirements, reduced greenhouse emissions and reduced transportation facility expenditures. The MIP shall promote transportation efficiency, including reduced vehicles miles, promote walking by providing safe, appealing and comfortable street environments. All development within the MIP shall implement these design concepts.
  
- f. For off-site transportation improvements, if a development needs to pay proportionate fair-share or proportionate share toward a needed improvement to meet concurrency and the remainder of that improvement's cost is not programmed for funding in either the 5 year Capital Improvements Element or the 10-year Concurrency Management System, then the sum of those proportionate share dollars shall be directed to improve specific facilities (pipe-lining) on a priority basis as determined by the county, except as it relates to the FDOT Strategic Intermodal System (SIS) facilities wherein FDOT will determine how funds will be directed. The County will consult and coordinate with all impacted roadway maintaining agencies (including FDOT and the Cities) regarding priorities on other than SIS facilities. The development will be approved if an agreement is executed on how the funds will be directed. The county reserves the right to condition the approval of development on the availability of funding for all necessary infrastructure to support and provide capacity for the proposed development. In the event the developer is responsible for off-site impacts, off-site county roads constructed by the developer with proportionate share dollars may be eligible for transportation impact fee and/or mobility fee credits. However, any said credit shall not exceed the amount of impact fee and/or mobility fees actually generated by the development.
  
- g. Proposed activities within the MIP shall be planned to avoid adverse impacts to wetlands and the required buffers as described in Policies 3.1.4 – 3.1.4.13. Land uses which are incompatible with protection and conservation of wetlands shall be directed away from wetlands. Once the extent of OFW wetlands has been determined, these wetlands will be placed in a perpetual conservation easement. However, it is recognized that development of this project may result in the loss of some wetlands. If these wetland impacts cannot be avoided, the developer shall impact only those wetlands which determined through applicable regulatory review to be of low ecological significance to the overall integrity of the larger wetland regime. Impacted wetlands shall be evaluated through the applicable

federal, state and county regulatory review, with the goal of avoiding wetland impacts to the fullest extent practicable. Where land uses are allowed to occur, mitigation shall be considered as one means to compensate for loss of wetlands function, so as to ensure that there is no overall net loss in wetland function and value. In cases where the alteration of the buffer is determined to be unavoidable, appropriate mitigation shall be required. It is also recognized that impacted or isolated wetlands may be enhanced or restored as part of water resource development or an approved alternative water supply project.

- h. A phase I cultural resource assessment survey shall occur prior to initiating any project related land clearing or ground disturbing activities that are not agriculturally related within the project area. The purpose of this survey will be to locate and assess the significance of any historic properties that may be present. The resultant survey report must conform to the specifications set forth in Chapter 1A-46, Florida Administrative Code, and be forwarded to the Division of Historical Resources for comment and recommendation in order to complete the process of reviewing the impact of the proposed project on historic resources. Should significant resources be present, additional archaeological testing may be necessary, and/or protection and preservation of significant sites may be required.

Policy 7.1.16.1. - Sector planning studies shall be required for all Developments of Regional Impact which include residential density above the established DRI threshold for Sumter County and for other areas as designated by the Board of County Commissioners. Such areas may include, but are not necessarily limited to highway corridors, interstate interchanges, areas of rapid growth or land use changes and areas of sensitive environmental resources. Upon completion of sector planning studies and adoption of a Sector Plan by the Board of County Commissioners, development within the Sector Plan area shall be pursuant to such adopted Sector Plan and the Comprehensive Plan.

- (2) The Proposed Text Amendment to the Future Land Use Element of the Sumter County Comprehensive Plan; Policy 7.1.2.19 – The Monarch Industrial Park (MIP) is consistent with the requirements of Chapter 163.3177(6)(a), F.S.; Rule 9J-5.005(1)(c)(5) and (6) and Rule 9J-5.006(4)(a), F.A.C. for the following reasons:

- a. The Policy is consistent with the requirement in Chapter 163.3177(6)(a), F.S. which states that (a) the future land use plan shall be based ". . . in rural communities, on the need for job creation, capital investment and economic development that will strengthen and diversify the community's economy . . ."

- b. The Policy contains specific standards governing the amount of industrial development and the timing of the development by requiring that the proposed development be processed and approved as a Development of Regional Impact (DRI).
  - c. The Policy requires that the property be developed in a manner to promote a transportation system, both on and off-site, which is consistent with the goals of providing mobility, that is energy efficient, which reduces greenhouse emissions, reduces vehicle miles and identifies funding mechanisms for implementation.
  - d. The Policy directs development away from the on-site wetlands so as to ensure compatibility of development.
  - e. The Policy is consistent with the provision in Chapter 163.3177(6)(a), F.S. that states "[t]he future land use plan may designate areas for future planned development use involving combinations of types of uses for which special regulations may be necessary to ensure development in accord with the principles and standards of the comprehensive plan and this act."
- (3) The Policy is consistent with Rule 9J-5.005(1)(c)(5), F.A.C. which requires that the adopted comprehensive plan shall consist of "[r]equired maps showing future conditions, including the future land use map or map series," in that the Future Land Use Map will have a designation of Monarch Industrial Park or MIP. The inclusion of Section (c) in Policy 7.1.2.19 is purely a timing mechanism and recognizes the underlying land use of Agricultural, which has a density of one (1) dwelling unit per 10 acres. The language contained in Policy 7.1.2.19(c) is no different from the requirement by the Department that specific language governing DRIs be placed in the local government's comprehensive plan spelling out densities, the timing of development, mix of housing types, specific transportation improvements and other conditions governing the development of a specific site.
- (4) The Department states that Policy 7.1.2.19 is inconsistent with Rule 9J-5.005(1)(c)(6), F.A.C. The section of the Rule cited is not applicable as it requires "[a] copy of the local comprehensive plan adoption ordinance at such time as the plan is adopted." The plan amendment has not yet been adopted, so no ordinance can be provided. Sumter County will furnish the Department a copy of the ordinance after adoption as required by Rule 9J-5.005(1)(c)(6), F.A.C.
- (5) Policy 1.7.2.19 is consistent with Rule 9J-5.006(4)(a) which requires that the Future Land Use Map show "(a) the proposed distribution, extent, and location of the following, generalized land uses . . ."

a. Industrial Use

The Future Land Use Map will show an industrial land use on the Monarch Ranch property of Monarch Industrial Park (MIP).

- (6) Further, the Department has failed to cite with any particularity how Policy 7.1.2.19 is internally inconsistent with other provisions in the County's Comprehensive Plan. The citations to Sections 163.3177(2) and (6)(a), F.S.; Rules 9J-5.005(1)(c), (5) and (6); and Rule 9J-5.006(4)(a), F.A.C. are not applicable as the content of those citations has been discussed above and they do not address the issue of internal consistency.

TABLE 1

Monarch Ranch  
City of Wildwood

Water and Wastewater Capacity Analysis												
Water	Current (MGD)	Projected (MGD)										
		2010	2011	2012	2013	2014	2015	2020	2025	2030	2035	
FDEP Permitted Capacity	4.752	4.752	4.752	4.752	4.752	4.752	8.252	11.752	11.752	14.752		
2010 Demand	2.544											
Comprehensive Plan Projections		2.870	3.160	3.460	3.750	4.040	6.060	8.790	10.450	12.310		
Monarch Ranch			0.029	0.059	0.088	0.147	0.235	0.381	0.528	0.675		
<i>Remaining Capacity</i>	<b>2.208</b>	<b>1.882</b>	<b>1.563</b>	<b>1.233</b>	<b>0.914</b>	<b>0.565</b>	<b>1.957</b>	<b>2.581</b>	<b>0.774</b>	<b>1.767</b>		

Wastewater	Current (MGD)	Projected (MGD)										
		2010	2011	2012	2013	2014	2015	2020	2025	2030	2035	
FDEP Permitted Capacity	3.55	3.55	3.55	3.55	3.55	3.55	6.55	6.55	9.55	9.55		
2010 Demand	1.609											
Comprehensive Plan Projections		1.91	2.06	2.22	2.37	2.52	3.6	5.04	5.92	6.09		
Monarch Ranch			0.024	0.049	0.073	0.122	0.196	0.318	0.44	0.562		
<i>Remaining Capacity</i>	<b>1.941</b>	<b>1.640</b>	<b>1.466</b>	<b>1.281</b>	<b>1.107</b>	<b>0.908</b>	<b>2.754</b>	<b>1.192</b>	<b>3.190</b>	<b>2.898</b>		

Notes:

Figures shown are represented as million gallons per day (MGD)

Current WUP of 4.98 MGD expires in 2013

10-Year Water Supply Plan due in 2012

Planned construction of Champagne Farms WTP to account for needed water demand (increases capacity to 8.252 and 11.752 after expansion)

Construction of Degreen - Plant #8 may be needed for long term (3.0 MGD would increase capacity to 14.752)

Construction and expansion of SE WWTTP to account for needed wastewater demand (3.0 MGD with additional 3.0 expansion option)