March 7, 2014

Mr. Glenn D. Storch
Storch & Harris LLC
420 S. Nova Road
Daytona, FL 32114

RE: Second Additional Information Request
    Farmton Application for Master Development Approval
    ECFRPC Element 140107

Dear Mr. Storch:

This agency has reviewed the responses to the first sufficiency for the Farmton Application for Master Development Approval pursuant to Chapter 380.06(10)(b), Florida Statutes. Other agencies having an interest in this application have also been asked for their reviews and comments.

Enclosed are informational requests received from reviewing agencies and local governments, as well as requests from regional planning council staff. Your responses should be distributed to the original distribution list.

If we can provide clarification of any request or otherwise assist you, please let me know.

Sincerely,

Hugh W. Harling, Jr., P.E.
Executive Director

c: Distribution List
ECFRPC Questions for Farmton First Sufficiency Response Submittal

1. Page 21-4, response to question 9. The response (used in several instances) did not answer the question about connection and continuation of the fixed rail system in Restoration.
2. It appears from the concerns raised by the county and FDOT that an additional north-south roadway may be required, despite the cited environmental concerns. Please comment.
3. The scales on Figures 21-1 and 21-2 are shown the same, however, this cannot be. Please address.
4. Please provide a map showing the locations of the improvements listed in Table 21.2.
5. Why does project traffic go down on US 1 between 2035 and 2060? Part of Williamson Blvd. also goes down.
6. Regarding the memorandum on the Proposed Fiscal Neutrality Framework, it is stated that Farmton’s holdings acknowledge certain infrastructure improvements are prohibited from receiving certain impact fee credits. Please explain which impact fees are being discussed and the rational for some receiving credits and others not.
7. Methodology 11 of the Fiscal Neutrality Framework states that all costs of transportation except those associated with roads and streets must be considered. Please explain.
8. Methodology 11 also assumes that human services, other non-operating costs and court and related costs will be assumed fixed throughout the Farmton planning and development timetable. Why would they be assumed fixed when they will be going up?
9. Why is the Gateway portion of the project not subject to the 1 to 1 jobs to housing balance?
10. The use of 200 square feet per employee is very general. Should this site develop with a large proportion of industrial space, the number of employees would be much lower. What is the employee ratio for office, retail and industrial, and why wouldn’t a more accurate method be adopted to determine the jobs count?
11. How was it determined that employment within three miles of Farmton would count toward the requisite Farmton employee count? Why was Restoration excluded?

Draft Development Order

12. Why are some listings highlighted in yellow on page three of the draft DO?
13. Any transference from beyond the 2025 timeframe needs to be done through an NOPC to the MADA. Please make changes where necessary in the proposed DO to reflect this in the table notes under General Condition 4 and 6d.
14. Condition 7 of the proposed DO discusses accessory or ancillary units. It should be specified whether these units count toward the residential allotment or if they are in addition to the residential allotment. We would support that they be in addition to the residential allotment.
15. Condition 9 of the proposed DO addresses annexations in the future. Please add a phrase requiring that impacts will still be determined on cumulative basis for traffic and jobs to housing ratio.
16. Condition 11 of the proposed DO states that the MDO will not expire. There should be an expiration date approximately 15 years beyond the proposed buildout date.

17. Condition 13 of the proposed DO addresses monitoring. Please add the ECFRPC as a recipient and reviewer of the annual reports pursuant to state rules.

18. Condition 20 of the proposed DO addresses conservation areas. Please include the ECFRPC in the list of entities to be consulted. Also, it is not clear who is approving the areas identified to be designated as RBOS areas. If it is the county, please specify.

19. Many of the wildlife conditions in the proposed DO include provisions that the applicant or developer consult with the FWC. The amount of time that will be required will be a burden on the resources of the FWC, and it is recommended that a mechanism be put in place to compensate the FWC for time spent on these reviews and consultation that go beyond the normal review process. Please consider a mechanism in the proposed DO that would accomplish this.

20. Condition 34 of the proposed DO refers to section 28. Should this be condition 33? If not, please explain where section 28 resides.

21. Condition 38 of the proposed DO discusses uses of stormwater. Some entities are treating stormwater to drinking water standards and this should not be precluded in this condition.

22. Condition 40 of the proposed DO states that 100-year flood plain impacts shall be minimized. Please add that these areas will also be avoided to the maximum extent practicable.

23. Condition 49 of the proposed DO addresses the use of Water Star standards for silver certification. Please restate to say that the residential and commercials shall be Gold Water Star certified.

24. Condition 51 of the proposed DO addresses Florida Friendly areas to the extent that “many of these open spaces do not require irrigation”. Please be more specific. Ideally, none of these areas should require irrigation after an initial establishment period.

25. Condition 53 of the proposed DO disallows the use of septic tanks. There may be instances where they are warranted, such as a remote education center or as a temporary use.

26. In the proposed DO, a condition should be included in the vegetative and wetland sections that address the control of invasive species.

27. The transportation provisions should not preclude the need for a second north-south roadway from SR 442, as this may be necessary to address project and background traffic. While this is not preferred due to environmental impacts, the preliminary traffic numbers indicate that it may be needed.

28. Condition 66 of the proposed DO, on lines 16 and 17 of page 19, states that, “The study prior to build-out will be for informational purposes only.” This statement may be taken out of context because it is not accompanied by the specific M&M conditions that are in the typical DO. This statement should be eliminated, but could be added in each individual DRI DO.

29. Condition 94 of the proposed DO addresses the use of energy program standards. The language is very broad. The list of standards is not up to date and while it does state that the third party program must be comparable as determined by PREC, some of the comparables may not be appropriate. Please eliminate reference to the National Association of Home Builders National
Green Building Standard and the Green Building Initiative Green Globes Standard. This would also apply to Condition 97b on page 25.

30. Condition 98a discusses the Gateway area and 98b discusses the Town Center. Please include a provision for a gridded street network in both areas.

31. Condition 108 of the proposed DO discusses alternative review processes. It is not clear what the intent of this condition is, and it is recommended that clarification be given or that it be deleted. Please discuss the intent of this provision.

32. Please add Brevard County to any and all distribution lists within the proposed DO.