

**EXHIBIT D: ENCPA Comprehensive Plan Amendment (CPA21-009) - Summary of Project Comments**

Number	Page(s)	Referenced Document	12/3/2021 Staff Comment	3/4/2022 Staff Comment	3/17/2022 Applicant Response	4/11/2022 Staff Comment (revised 4 28 2022)
Shaded text indicates unaddressed issues						
General						
1	N/A	FLUM Amendment Narrative	This application is not complete. The following comments are non-binding comments generated during the completeness review. Provision of these courtesy comments was executed at the request of Raydient. These comments are not intended to be nor should they be construed as comprehensive. Upon submittal of a complete application, additional comments or refined comments are likely to be provided. The provision of the "courtesy comments" in no way obligates Nassau County to any level of approval or acceptance of the CPA & DSAP documents; additional comments will be forthcoming after the more formal and comprehensive post-completeness first round review.	Comment addressed: application deemed complete on 2/11/2011		
2		FLUM Amendment Narrative	Throughout the document there are references to DSAP #2, a future DSAP. Application CPA21-009 is a Comprehensive Plan Amendment to amend the ENCPA Master Land Use Plan/FLUM-6. As such, the context of the CPA21-009 is the entire ENCPA Sector Plan as differentiated from a narrowly focused application for a portion of the ENCPA, e.g. a DSAP. Remove all references to DSAP #2 from CPA21-009 and related data and analysis. Execute proper data and analysis to support an amendment to the ENCPA Master Land Use Plan/FLUM-6 and the Transportation Element/FTMS.	Comment partially addressed - Staff is working with Applicant to update FTMS maps and has prepared comp plan amendment to adopt these maps and update the Transportation Element GOPs.	The map series has been amended by Jason Gregory; see email dated March 11, 2022.	Comment addressed - the applicant has assisted staff in compiling the FTMS maps.
Land Use						
3	3	FLUM Amendment Narrative	Acreages in table do not add up. Revise to reflect correct totals.	Comment addressed: acreage errors were corrected.		
4	3 & 7	FLUM Amendment Narrative	Rectify CHN acreage in FLUM amendment and DSAP submittal. CHN acreage in FLUM amendment table on page 3 (6,978) does not match CHN acreage on page 7 of FLUM amendment (6,800 - response G) or CHN acreage in DSAP submittal page. 9 (7,062) and Consistency Analysis (6,900).	Comment partially addressed. However on Page 66 the statement is made that the CHN includes flood zone areas, nearly 7,000 acres of the subject property. Is this referring to CHN wetlands? If so, this should be almost 5,000, not 7,000 acres since there are 2,165 acres of upland CHN.	The application includes a map that overlays the FEMA Flood zones with the CHN boundaries. The CHN consists of both uplands and wetlands. Within the subject amendment area, the approximate acreage of the entire CHN is 7,000 acres. The FEMA/CHN overlay map shows that a portion of the CHN also includes the FEMA Flood zones. The FEMA Flood zones is estimated to be approximately 1,700 acres within the CHN. The narrative on page 66 has been revised to reflect this information	Comment addressed - acreage errors were corrected.

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5		4 FLUM Amendment Narrative	Application states "the proposed amendment is not increasing or modifying the approved and programmed ENCPA mix of uses nor changing the distribution of uses." The land use table on page 3 is being modified. Provide data and analysis to demonstrate how these changes impact the Master Land Use Plan/FLUM-6, i.e. the entire ENCPA Sector Plan.	Comment addressed. As the table below shows, the Applicant did address County Planning Staff's concern that the land use mix had been substantively changed with the Tier 2 land use category significantly increased at the expense of the Village Centers, Tier 1, and Resort land uses, which were dramatically reduced in acreage in the initial submittal. Staff believes that these are critical land uses, in particular the Village Center and Tier 1 land uses that work together symbiotically to provide for walkability and Village Center vibrancy and safety. While the Village Center, Tier 1, and Resort land uses acreages have been increased, the VC & Tier 1 land uses have been reduced by 14%, while the bedroom-community density Tier 2 acreage has increased by 35%. Staff remains committed to supporting the Village Centers through the strong element of Tier 1 residential around them, and therefore encourages the Applicant to consider increasing Tier 1 acres to restore the adopted 751 acres. However, Staff will not object to the proposed mix.	The proposed ENCPA Master Land Use Plan/FLUM-6 has been revised to increase the Tier 1 land use category to more closely mirror the existing acreage. The new proposed total is 745 acres, a difference of 7 acres from the existing total of 751 acres. NOTE: the table referenced in the comment above is intentionally not copied into this response; see the comment letter for reference	Comment addressed: the Applicant has restored Residential Tier 1 acreage to be close to what was adopted. The approximately one-third increase in Residential Tier 2 acreage was accomplished by a similar reduction of Residential Tier 3 (rural) acreage. The overall ENCPA maximum residential acreage and minimum commercial acreage has not changed.
6	4	FLUM Amendment Narrative	Objective PSF.04 requires the location of schools in and around village centers. Village centers have better access, more land use diversity, and schools are compatible and complimentary uses to businesses, civic, and institutional uses. OBJECTIVE PSF.04 "The County shall enhance community design through effective school facility construction and siting standards. Encourage the siting of school facilities so they serve as community focal points and so that they are compatible with surrounding land uses." Policy PSF.04.02 "The County shall to fullest extent possible, cooperate with the School District to identify new school sites that provide logical focal points for neighborhoods, and serve as the foundation for innovative land design standards." Provide data and analysis to demonstrate how this objective and policy will be realized despite a significant decrease in VC land use.	Comment partially addressed -Staff is working with School District staff, parks consultants, and Applicant to locate schools and parks in proximity in its general location site analysis, which is part of the separate DSAP review.	The school and park locations have been determined and evaluated both by the School District and staff along with the parks consultants. On March 16, 2022, the parks consultant presented site suitability of each park location. Refer to the companion DSAP 2 application for the Parks and Schools location map. Update: school sites have tentatively been agreed to by County/Schools staff and applicant.	Comment addressed and park conceptual site plans will be included in the upcoming DSAP that will ensure that the parks can be utilized as intended. County Staff, Schools Staff, and County park consultants have agreed on general locations for park and school sites. Consultants are now developing conceptual park site plans for review by both sides.
7	7	FLUM Amendment Narrative	CHN acreage included in the response to Review Criteria and Justification paragraph (G) is incorrect.	Comment addressed: acreage errors were corrected.		

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Natural Resources						
Number	Page(s)	Referenced Document	Comment	Response		
8	A-4 - A-12	FLUM Amendment Narrative	Provide narrative/discussion on how vegetative communities relate and conform to overall planning program/uses.	Comment addressed for CPA purposes - narrative on vegetative communities and how they relate to the development program. The DSAP will also include a CHN management plan that will identify and provide development standards that take vegetative communities into account.		
9	A-4 - A-12	FLUM Amendment Narrative	Provide narrative/discussion on how sensitive ecological communities are protected from development impacts.	Comment addressed for CPA purposes - protection of sensitive ecological communiites will be set forth in upcoming DSAP(s).		
10	A-4 - A-12	FLUM Amendment Narrative	Provide information on when wildlife survey was completed. Include number of site visits, when they occurred, what time of year.	Comment addressed: requested information was provided.		
Public Facilities						
11	3	FLUM Amendment Narrative	Acreages in table do not add up. Revise to reflect correct totals.	Comment addressed		
12			While there are numerous inconsistency throughout the submitted material that is further complicated by an overlap between the CPA21-009 and DSAP21-001, it appears that a river front park required to have a multi-lane boat ramp (7 lanes) with adequate parking, is located in a Village Center. in review of the VC land use category, a regional scale boat ramp does not seem to be consistent with the requirement of VC. It would be prudent to review the acreage/requirements associated with VCs juxtaposed against the level of service standard of one ramp lane for each 5,000 persons defined in Policy ROS.01.04. This policy currently exists and will be part of the land use amendment that was adopted December 13, 2021.	Comment addressed & will be further addressed in DSAP resubmittal. Staff has worked with parks consultants and applicant to develop acceptable parks location program, and the consultants are now developing park conceptual site plans.		

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13			Numerous changes to the mobility network are proposed without supporting data and analysis. IN addition, there are numerous inconsistencies between the various documents submitted pertaining to both mobility network roads and non-mobility network roads. Update the material, ensure internal consistency and prepare the data and analysis to support an amendment to the ENCPA Sector Plan Master Land Use Plan/FLUM-6 and Transportation Element/FTMS	Engineering to address upon revised traffic study completion	As discussed during the comment review meeting March 14, 2022, the companion DSAP 2 TIA report provides sufficient data and analysis to support the proposed changes to the ENCPA mobility network. The Proposed ENCPA Mobility Improvement Map clearly shows this amendment maintains the existing, approved connections to the ENCPA Mobility Network and shifts the Non-ENCPA Mobility Road CR108/Chester Road connection south to protect the character of the Roses Bluff neighborhood to the north. The proposed changes to the mobility network address internal re-alignment. See Appendix B, Transportation Impact Analysis and the Proposed ENCPA Mobility Improvement Map. See also the companion DSAP 2 Application and Appendix B, Transportation Impact Analysis	Comment not addressed. T.01.02 & T.02.03 - The Proposed ENCPA Mobility Improvement Map shows numerous locations where connections have been relocated or added. The external connections are not the same. One of the three original connections was relocated and there are three additional connections to external roadways. The information in the consistency analysis and narrative regarding the relocation of the CR108/Chester Road connection is helpful, but similar explanation language regarding the Blount's Branch connection to Pages Dairy, the re-alignment of the CR 108 intersection at US17, and any other relocated connections need to be included in the narrative of the CPA document. Staff and the review team may be familiar with the reasons for the change but this information should be documented in the CPA narrative.
14			The exhibit provided on page 4 under the section heading of "Proposed Future Land Use Map" of the Future Land Use Map Amendment document is titled "Wildlight - DSAP #2 Proposed Future Land Use". This again illustrates the inappropriate intertwining of the proposed amendment to the ENCPA Master Land Use Plan/FLUM-6 and an application to establish a new DSASP within the ENCPA Sector Plan.	Comment addressed: the "DSAP" term has been removed to make clear that this application is only concerned with the CPA.		
15	Consistency Analysis D-3	FLUM Amendment Narrative	FL.13.04. - Demonstrate consistency of planned recreational trails and pathways in the context of the ENCPA Mobility Plan.	Comment not addressed. Label identified mobility network roads / corridors to correspond with proposed cross sections to clarify what is planned.	Response: As discussed during the March 14, 2022 meeting, we prepared the ENCPA Contextual Trails Map to demonstrate the planned recreational trails along the ENCPA Mobility Network. The narrative has been revised to include this map exhibit. Each future Preliminary Development Plan (PDP) will identify the corresponding cross section and local connections to the Contextual Trails Map.	Comment addressed: recreational trails to be addressed at the PDP level and will identify cross-sections and local connections to Contextual Trails Map, which is now part of the narrative.
16	A-2	Appendix A Environ. Assess.	Identify locations of wildlife corridors and roadway crossings.	Comment addressed with provision of Long Term Habitat Management Plan & will be further addressed in DSAP resubmittal and the CHN management plan.		
17	A-4 - A-6	Appendix A Environ. Assess.	Provide acreages associated with each wetland and surface water community.	Comment addressed: requested acreage provided.		
18	A-5	Appendix A Environ. Assess.	Provide acreages associated with each upland community.	Comment addressed: requested acreage provided.		

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19	A-4 - A-12	Appendix A Environ. Assess.	Provide narrative/discussion on how vegetative communities relate and conform to overall planning program/uses.	Comment to be addressed in DSAP resubmittal and CHN management plan.	Response: In response to the recently issued CPA Comments, in particular Comments 19,21 and 22, please find attached to this comment letter an example of a Long Term Habitat Management Plan consistent with FL.13.07.A.1. The Applicant proposes to develop a Final Long Term Habitat Management Plan coincident with submittal of each PDP within DSAP 2 and said plan may be specific to the property subject to the PDP at issue or to other DSAP 2 lands (e.g. specific to lands within multiple PDPs or portions thereof) as determined by the Applicant and appropriate state regulatory agencies.	Comment addressed with the inclusion of the Long Term Habitat Management Plan, which will be developed in final form for future PDPs.
20	A-4 - A-12	Appendix A Environ. Assess.	Provide information on when wildlife analysis was completed. Include number of site visits, when they occurred, what time of year.	Comment addressed.		
21	Consistency Analysis D-2	FLUM Amendment Narrative	FL.13.01.H - Analysis provided does not sufficiently address consistency. Demonstrate how the CHN defines, connects and protects significant natural habitats.	Comment addressed and will be further addressed in DSAP resubmittal and CHN management plan.	See Comment # 19	Comment addressed with the inclusion of the Long Term Habitat Management Plan, which will be developed in final form for future PDPs.
22	Consistency Analysis D-2	FLUM Amendment Narrative	FL.13.03.A - Analysis provided does not sufficiently address consistency. Demonstrate how the CHN protects and enhances natural systems.	Comment to be addressed in DSAP resubmittal and CHN management plan.	See Comment # 19	Comment addressed with the inclusion of the Long Term Habitat Management Plan, which will be developed in final form for future PDPs.
23	Consistency Analysis D-1	FLUM Amendment Narrative	FL.13.01.C - Application CPA21-009 is incomplete as it fails to define "seasonal" homes.	Comment not addressed.	Revised, see also Policy FL13.01, C Housing Types. This section has been expanded to provide illustrative examples of seasonal homes allowed by the land use categories. Examples include fractional ownership, vacation rental and secondary homes.	Comment addressed: definition of seasonal home provided.
24	Consistency Analysis D-1	FLUM Amendment Narrative	FL.13.01.D - Application CPA21-009 as incomplete as it fails to identify "transportation hub" and define "supporting intensities and densities."	Comment not addressed.	As discussed March 10, the transportation hub is reflected on the Master Land Use Plan as the northern Village Center located at the intersection of US 17, Wildlight Parkway, I95 and the rail line – the confluence of which creates the “hub”. The supporting intensities and densities refer to the minimum nonresidential and residential development required by the Village Center and Tier 1 land use within this hub.	Comment addressed: transportation hub identified at the northern Village Center located at the intersection of US 17, Wildlight Pkwy, I-95, and the rail line.

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25	Consistency Analysis D-1	FLUM Amendment Narrative	FL.13.01.D - Text identifying TOD Overlay locations on FLUM needs to be enlarged (illegible).	Comment not addressed.	See revised ENCPA Master Land Use Map/FLUM-6. In addition to the line symbology indicating the TOD, the text label has been enlarged.	Comment addressed: requested changes made.
26	Consistency Analysis D-1	FLUM Amendment Narrative	Both TOD boundaries have been greatly reduced. Return the TOD boundary to its current size as defined in the currently adopted FLUM-6. (FL.13.06).	Comment addressed.		
27	Consistency Analysis D-3	FLUM Amendment Narrative	FL.13.06.H - Provide additional information to clarify which TOD Overlay will include pedestrian bridge and identify location. Text refers to a connection from the "east" side of DSAP 2. Change east to west.	Comment will be addressed more specifically in DSAP resubmittal.		
28	Consistency Analysis D-2	FLUM Amendment Narrative	Provide consistency analysis for this policy.	Comment addressed: analysis provided for applicable policies.		
Pertaining to the following comments 29-33, Staff believes that the proposed land use mix is an acceptable consensus. Two important review criteria included creating walkable communities and conserving environmental lands. The proposed combination of Village Center, Resort, and Residential Tier 1 provides for compact development and synergy needed to support the village centers. Acreage of these three land uses now slightly exceed what is now adopted. The CHN itself has increased by 191 acres and provides a connected greenway for habitat preservation, wildlife crossings, and passive recreation. The Applicant sought to increase Residential Tier 2 acreage, at first by 39% and in the latest submittal by 31%. While it is still the dominant non-CHN land use, Tier 2 neighborhoods will still be connected to the community through sidewalks and trails, and required neighborhood parks will all promote walkability.						
29	Consistency Analysis D-9	FLUM Amendment Narrative	FL.13-14 - The Village Center land use area has been reduced by 53% and the number of Centers has been reduced eight to five. Provide data and analysis to demonstrate how the change is consistent with applicable review criteria and how it impacts the overall land use plan. Response must pertain to the current draft application and not the originally adopted sector plan.	Comment addressed - VC land use restored from 47% to 92% of adopted acreage, which Staff believes is acceptable.		
30	Consistency Analysis D-9	FLUM Amendment Narrative	FL.13-14 - The Resort Development land use has been reduced by 25%. Provide data and analysis to demonstrate how the change is consistent with applicable review criteria and how it impacts the overall land use plan. Response must pertain to the current draft application and not the originally adopted sector plan.	Comment addressed - Resort land use restored from 75% to 95% of adopted acreage, which Staff believes is acceptable.		
31	Consistency Analysis D-9	FLUM Amendment Narrative	FL.13-14 - The Tier 1 Residential land use has been reduced by 67%. Provide data and analysis to demonstrate how the change is consistent with applicable review criteria and how it impacts the overall land use plan. Response must pertain to the current draft application and not the originally adopted sector plan.	Comment addressed - However Tier 1 land use is a lower 84% of adopted acreage. Staff recommends that the Applicant consider increasing Tier 1 acres by 123 to restore the adopted 751 acres. However, Staff will not object to the proposed mix.	Response: In response to the staff request, the proposed ENCPA Master Land Plan/FLUM – 6 has been revised to increase the Tier 1 land use to 744 acres, a difference of 7 acres from the existing acreage of 751 acres	Comment addressed with the near-retoration of Tier 1 Residential land use subcategory acreage.

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32	Consistency Analysis D-9	FLUM Amendment Narrative	FL.13-14 - The Tier 2 Residential land use has been increased by 45%. Provide data and analysis to demonstrate how the change is consistent with applicable review criteria and how it impacts the overall land use plan. Response must pertain to the current draft application and not the originally adopted sector plan.	Comment addressed - However Tier 2 land use is 135% of adopted acreage, and Staff is concerned that this bedroom community density will more dominate the land use mix. Staff recommends that the Applicant consider transferring 123 Tier 2 or Tier 3 acres to Tier 1, which is a more dense and walkable land use that will better support the Village Centers. However, Staff will not object to the proposed mix.	As a direct result of increasing the Tier 1 land use requested by staff, the Tier 2 and 3 land uses have modified by reducing the amount of Tier 2 and increasing Tier 3.	Comment addressed
33	Consistency Analysis D-9	FLUM Amendment Narrative	FL.13-14 - The Tier 3 Residential land use has been decreased by 32%. Provide data and analysis to demonstrate how the change is consistent with applicable review criteria and how it impacts the overall land use plan. Response must pertain to the current draft application and not the originally adopted sector plan.	Comment addressed - while Staff would prefer to increase Tier 3 rather than Tier 2 acreage, in the interests of compromise, we will accept the land use mix with a recommendation to restore the Tier 1 residential acreage.	Response: In response to the staff request, the Tier 3 land use acreage has been increased, reducing Tier 2 land use acreage.	Comment addressed: while the Tier 3 Residential has been reduced by approximately 40%, it still includes 1,664 acres, which will provide ample opportunity for rural character development.
34	5	FLUM Amendment Narrative	Your response to the 14 FLUM amendment criteria is deficient. This criterion states that "This proposed amendment follows the approved entitlement of the East Nassau Community Planning Area Sector Plan – a plan determined to meet the criteria of Florida Statutes and the Nassau County Comprehensive Plan. The ENCPA provides for a mix of uses, with a defined development program, including minimum and maximum intensities and densities. The ENCPA is supported by a Mobility Network based on vehicle miles traveled and unique to the approved entitlement program. These changes simply reflect actual site and parcel conditions. In addition, the ENCPA Sector Plan was approved over ten years ago and has been determined to not constitute urban sprawl." This response only discusses the adopted sector plan, not the proposed amended sector plan, and in a general way. Provide a specific response for each of the FLUM criteria [F.S. 163.3177(6)(a)(9), I-ix].	Comment addressed - narrative includes an evaluation of each of these FLUM criteria		

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35		6 FLUM Amendment Narrative	Your response to Criterion C of the FLUM review criteria and justification [Urban Sprawl rule, F.S. 163.3177(6)(a)(9)] is deficient. The criterion states that "The ENCPA is a Section 163.3245, Florida Statutes, Sector Plan and thus is not required under State law to demonstrate need. Notwithstanding this the proposed changes seek to better align market conditions in the continually developing Nassau County to respond to the County and region development trends. The ENCPA mix of uses has been programmed for in the Comprehensive Plan, and the ENCPA is entitled for 24,000 units and 11,000,000 square feet of non residential uses. This amendment does not modify the development program." In fact the development program has been modified with significant changes to land use category acreages. Provide justification for such modifications.	Comment addressed - applicant provides various reasons for changes such as more accurately depicting CHN, reducing Tier 3 acreages to better maximize development efficiencies, clustering Tier 1 Residential around Village Centers, and shifting Tier 2 Residential land uses closer to the Mobility Network.		
36	6-7	FLUM Amendment Narrative	Your response to Criterion E of the FLUM review criteria is deficient and does not adequately address each of these seven important directives. This criterion reads as follows: "Demonstrate the extent to which the amendment will result in a fiscally and environmentally sustainable development pattern through a balance of land uses that is internally interrelated demonstrates a context sensitive use of land; ensures compatible development adjacent to agriculture and environmentally sensitive lands; protects environmental and cultural assets and resources; provides interconnectivity of roadways; supports the use of non-automobile modes of transportation; and appropriately addresses the infrastructure needs of the community." While the determination may have been made in the Sector Plan approval that the current land use plan satisfied these criteria, the proposed land use map is a very different program with large decreases in village centers and the resort area, as well as a large increase in Tier 2, the suburban tier. Address how such changes affect the current balance of land uses, context-sensitivity, connectivity, walkability, and infrastructure provision.		Response: This amendment does not increase or decrease the approved Entitlement Development Program or modify the minimum and maximum intensities for each land use category. In addition, the proposed ENCPA Master Land Use Plan/FLUM- 6 has been modified to address the staff request to increase the amount of Tier 1 and Tier 3 land use categories and reduce the Tier 2 land use category.	Comment partially addressed - fiscal impact analysis not provided. The resubmittal does modify adopted land use category acreages. While the Applicant has brought the land use mix closer to what is adopted, there are still significant deviations from what is approved, including the increase of almost a third of Tier 1 and the 39% reduction of Tier 3 acreage. The Applicant has not re-run the fiscal analysis but should do so to determine the extent of variation in fiscal impacts from adopted to proposed.  There have been significant changes to the impact and mobility fees, phasing schedule, and mix of uses since the original submittal. With the applicant's concurrence, Staff will engage a third party expert to work with the County and applicant to update fiscal impact analysis.
37	6-7	FLUM Amendment Narrative	Similarly to the issues raised in E. above, how will the changes from the current to the proposed land use map affect the factors referenced in F. like clustered population, "medium to high densities appropriate to context," land use mix, interconnected streets, etc.? (FL.01.04.F)	Comment addressed: the land use acreage mix has substantively restored to close to adoption levels.		



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38		8 FLUM Amendment Narrative	Show how Tier 1, 2, and 3 land uses meets the Village Center proximity requirements of Policy FL.13.07(E). The distance from Tier 3 to Village Centers fall under one mile in many locations. Revise map to adhere to Policy FL 13 requirements.	Comment addressed: Applicant provided an exhibit that shows how the proximity standards mirror the land use arrangement.		
39		8 FLUM Amendment Narrative	Consistent with Comprehensive Plan Policy FL.13.11, demonstrate how the proposed development plan will meet or exceed the jobs-to-housing balance ratio of 0.84 jobs to number of projected employed residents. Provide actual (on-the-ground) and phased ratios at both the sector plan and DSAP level for the current and proposed land use map.	Comment addressed: Applicant provided updated jobs-housing ratio.		
40		10 FLUM Amendment Narrative	Policy FL.08.06(A) "Develop in a pattern providing for compact, mixed use, contiguous development patterns and avoids development indicative of urban sprawl as defined in Policy FL.01.04." Significantly reducing village center and resort area and increasing suburban Tier 2 land use is in conflict with the direction of this policy. Provide thorough data and analysis demonstrating how the proposed reassignment of land uses is not in contradiction to this policy.	Comment addressed by substantively restoring land use acreage mix to adopted levels, which does provide for elements of compact, mixed use, and contiguous development pattern as opposed to a single-use and spread-out sprawl pattern.		
41		10 FLUM Amendment Narrative	<p>Policy FL.08.01 requires that "the County shall ensure that development orders are conditioned upon the provision of adequate public facilities and services as identified in this plan. The County may not issue a development order or permit that results in a reduction in the level of service (LOS) for the affected public facilities below the minimum level of services established in this plan. Public facilities and services must meet or exceed the level of service standards established in this plan and must be available when needed for the development as specified in this plan."</p> <p>The Applicant indicates that this policy and statute was met when the original sector plan was adopted, but the proposed land use map is very different with a steep decrease in village center and resort area, and a large increase in the suburban Tier 2 land use area. It is likely that these changed circumstances will result in different outcomes. The proposed land use plan must be examined in its own right, and compared with the current plan in regard to public facilities and service provision and how they impact level of service standards.</p>	Comment addressed for CPA purposes. Staff will require a more finely-grained analysis of public facilities needs and scheduling at the DSAP level.		
42		FLUM Amendment Narrative	Provide data and analysis that demonstrates conformance with Policy FL.13.06 regarding Transit Oriented Development (TOD).	Comment addressed.		

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43	B-26	Appendix B, Transp.	Provide data and analysis that justifies delaying construction of the Chester Road-US 17 connection to 2052.	Engineering to address upon revised traffic study completion.	As discussed during the March 14, 2022 Transportation meeting, the companion DSAP 2 Transportation Impact Analysis clearly addresses the phasing program including construction of the ENCPA Mobility Network. It is also noted that internal connections of non-ENCPA Mobility Roads will also provide traffic circulation.	Comment addressed for CPA purposes. Review will be required during DSAP #2 review process and during subsequent PDP TIA reviews.
44	Consistency Analysis D-2	FLUM Amendment Narrative	Analysis provided is deficient. Demonstrate how the I-95 interchange will facilitate implementation of the LRTP.	Engineering to address upon revised traffic study completion.	Response: As discussed during the March 14, 2022 Transportation meeting, it is not clear if this comment refers to the existing US17/I95 Interchange or the proposed 'new' I95 Interchange. This response addresses both. For the existing US17/I95 Interchange, the realignment of the ENCPA Mobility Network, specifically Wildlight Parkway maximizes the existing built transportation infrastructure because the connection is more direct than the proposed southerly connection to US 17. This facilitates the Long Range Transportation Plan by building a smarter road network. Regarding the new I95 Interchange, the ENCPA mobility fee is assessed to development within the ENCPA Sector Plan to construct a roadway network, relieving the County from making these improvements. In this case, the assessment of the ENCPA Mobility Fee facilitates the implementation of the LRTP by eliminating other necessary road improvements – providing a funding mechanism	Comment addressed for CPA purposes: at the DSAP level County Staff will require analysis of the impact of the I-95 interchange on the County's Long Range Transportation Plan.
45		8 FLUM Amendment Narrative	Demonstrate consistency with Policy FL.13.09 regarding the St Marys Greenway, by clearly depicting show the Green Ribbon on the ENCPA Master Land Use Plan/FLUM-6 in a manner consistent with the presentation given to the individual members of the Board of County Commissioners.		Response: As discussed March 10, 2022, see the ENCPA Master Land Use Plan/FLUM – 6 revised to depict the St. Marys Greenway.	Comment addressed for CPA purposes - DSAP applications will include how the two distinct elements of the St Marys River Greenway and Green Ribbon work together in terms of function, public access, and design.
46	22, 91	FLUM Amendment Narrative	There is a conflict between the header term (minimum) and the ranges presented. The term "minimum" should be removed and replaced with "range."		None	Comment addressed: the narrative has been updated to use the word "minimum" for nonresidential acreage, and "maximum" for residential acreage.

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47	27	FLUM Amendment Narrative		The submittal states more than once that there are no changes to any connections of the ENCPA mobility zone to the other mobility zones. Most if not all of the connections have been relocated and have changed in nature. Please provide narrative justification for proposed changes including the new connection at Blount's Branch to Pages Dairy, and the two additional connections to US 17.	The narrative for both the CPA Transportation Impact Analysis and the companion DSAP 2 Transportation Impact Analysis has been revised to outline the realignment of the ENCPA Mobility Network. Chiefly, the connection to Chester Road has been intentionally shifted south and designed with a roundabout at Heron Isles to preserve the character of the community as well as continue the recent four-laning of Chester Road at Pages Dairy	Comment not addressed. T.01.02 & T.02.03 - The Proposed ENCPA Mobility Improvement Map shows numerous locations where connections have been relocated or added. The external connections are not the same. One of the three original connections was relocated and there are three additional connections to external roadways. The information in the consistency analysis and narrative regarding the relocation of the CR108/Chester Road connection is helpful, but similar explanation language regarding the Blount's Branch connection to Pages Dairy, the re-alignment of the CR 108 intersection at US17, and any other relocated connections need to be included in the narrative of the CPA document. Staff and the review team may be familiar with the reasons for the change but this information should be documented in the CPA narrative.
48	59	FLUM Amendment Narrative		Information in Table A.7.1 of the Environmental Assessment and in the Narrative document regarding sturgeon likelihood does not reflect NOAA Fisheries guidance found at <a href="https://www.fisheries.noaa.gov/resource/map/atlantic-sturgeon-critical-habitat-map-and-gis-data">https://www.fisheries.noaa.gov/resource/map/atlantic-sturgeon-critical-habitat-map-and-gis-data</a>	Response: The USFWS designated critical habitat for the Endangered (E) Atlantic sturgeon ( <i>Acipenser oxyrinchus</i> ) as detailed in the Federal Register 2017-17207 (FR). The physical habitat features considered essential for this species include: hard bottomed substrate in freshwater for spawning and development of early life stages; waters with a salinity gradient with soft substrate; waters of appropriate depth without barriers to movement from the mouth of the river to the spawning areas; and appropriate water quality conditions especially regarding temperature and dissolved oxygen. A portion of the St. Marys River is included in the critical habitat designation, which is adjacent to the DSAP 2 area. Per the FR, the ordinary high water mark (OHWM) on each bank of the river and shorelines is the lateral extent of the occupied critical habitat unit for the St. Marys River.	Comment addressed. However, stating that "likelihood" is low provides limited information. Additional guidance to avoid impact to the habitat may be helpful, so all parties are aware of the close proximity and can identify potential impacts due to the development before they impact the river and the sturgeon.
49	26	FLUM Amendment Narrative		Consistency analysis response to Objective T.01 is unclear. To prove consistency the TIA and narrative should demonstrate how the development will maintain LOS standards as it progresses.	As discussed during the March 14, 2022 Transportation meeting, the companion DSAP 2 Transportation Impact Analysis clearly addresses the phasing program including intersection capacity during the development progra	Comment Addressed for CPA purposes. Review of the DSAP 2 TIA and phasing; as well as review of the TIA's for each subsequent PDP will be required and will address this concern.

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50	30	FLUM Amendment Narrative		Provide proposed cross sections for all mobility roads shown.	As discussed during the March 14, 2022 Transportation meeting, the companion DSAP 2 Application – Mobility Section includes all cross sections for the ENCPA Mobility Network.	Comment not addressed. Either provide all cross sections or none, reserving this for the DSAP.
51	31	FLUM Amendment Narrative		Objective T.05.01 states to "Encourage Circulation within Development. Development shall include features and provisions, which encourage internal automobile circulation, bicycle use, pedestrian movement, and other features to minimize utilization of the major roadway network." The narrative addresses major roadways within the ENCPA Network, but also needs to demonstrate how this is accomplished along bordering roadways in adjacent mobility zones. Include all interim phases up to complete buildout.	As discussed during the March 14, 2022 Transportation meeting, the narrative has been revised to provide examples including block length and access management standards to be outlined in the Preliminary Development Plan	Comment addressed for CPA purposes. Subsequent DSAP and PDP reviews will provide more focus.
52	79	FLUM Amendment Narrative		FL.13.09 states that development within the Greenway shall be limited to river access, observation decks, walkways, education or conservation centers, golf courses, walking trails, and other passive recreation uses. Narrative FL.13.01.A states in the last sentence that "Ancillary uses, concessions and amenities may be located within the Green Ribbon to support its activation." Remove language regarding concessions. E63	As discussed during the March 14, 2022 Transportation meeting, the St. Marys Greenway is an average of 100' feet and a minimum of 50' feet in width. The Green Ribbon connects to the regulatory St. Marys Greenway and is able to include supporting uses such as concessions. The narrative also states that development will comply with the policy.	Engineering defers allowable uses to Planning. Planning supports concessions in the Greenway with appropriate DSAP and PDP standards to limit potentially negative impacts to public enjoyment of parks.
53	37	FLUM Amendment Narrative		School traffic does not seem to be accounted for in the TIA. Provide Data, Analysis, and all native files incorporating existing and proposed school traffic impacts.	Please see revised Transportation Impact Analysis for this application and the companion DSAP 2 TIA. The school locations are included and identified as to type.	Comment addressed. The school traffic was originally included and continues to be included.
54	5	TIA Methodology		The ENCPA Mobility Network does not exist in a vacuum. All three mobility zones compliment and depend on the others to function properly. It is unclear what the applicant is trying to prove with the analysis – there is no recommendations/results section. The applicant shows some intersection and segment failures, but doesn't indicate why these are or are not recommended for correction/mitigation and the timing of the correction/mitigation.	Please see revised Transportation Impact Analysis for this application and the companion DSAP 2 TIA. As discussed during the March 14, 2022 meeting, the ENCPA Mobility Network is designed to contribute to the overall County roadway network, including a specific mobility fee. The entitlement program remains the same as entitled and approved as well as analyzed in the adjacent Mobility Zones. Therefore, any non-ENCPA Mobility Network deficiencies have been accounted for within the fee assessment for those Mobility Zones	Comment addressed for CPA purposes. As stated previously and at the meeting; while it is recognized at buildout that the planned ENCPA Mobility Network improvements will mitigate the developments impacts on the existing roadway network, Staff is concerned about how the developer plans on mitigating impacts in the approximately thirty (30) year interim period before the improvements are completed. Staff will require this be demonstrated in the phasing plan proposed in the DSAP #2 document and in each subsequent PDP.

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55	TIA	TIA Methodology		There is only a Phase I (2027) and Phase IV (2052) analysis. Though not explicitly stated, it is assumed the Phase I analysis has no mitigation road connections and Phase IV analysis has all internal ENCPA roads connected. This analysis is only sufficient to show what improvements are needed by 2027, but not enough to determine when improvements may be needed prior to 2052 (before all connections are made). Please clarify.	Please see revised Transportation Impact Analysis for this application and the companion DSAP 2 TIA. As discussed during the March 14, 2022 meeting, the CPA provides a short and long term look at transportation. The companion DSAP 2 TIA provides a multiple phase development program including a draft proposed improvement schedule.	Comment addressed for CPA purposes. As stated previously and at the meeting; while it is recognized at buildout that the planned ENCPA Mobility Network improvements will mitigate the developments impacts on the existing roadway network, Staff is concerned about how the developer plans on mitigating impacts in the approximately thirty (30) year interim period before the improvements are completed. Staff will require this be demonstrated in the phasing plan proposed in the DSAP #2 document and in each subsequent PDP.
56	TIA	TIA Methodology		While there is a trip generation and trip distribution shown, there is no way to check to determine if the volumes used in Synchro analysis are correct. Provide a figure showing existing turning movement counts, projected background turning movement counts, and projected development turning movement counts.	Please refer to Figures F1 and F2 within Appendix F of the Transportation Impact Analysis. The figures illustrate the projected developments traffic counts in the AM and PM, respectively.	There are approximately 17 figures in F1 and F2 that are used with trip generation found on Page B-23 and internal capture in Appendix F3, but there is no figure showing the background traffic and additional traffic shown by each zone, etc. It is not reasonable for review entities to recreate.
57	TIA	TIA Methodology		For clarity, the Synchro sheets always show time period (AM/PM) and scenario (Phase 1, Buildout, etc.).	Correct	Staff has determined that this comment is more appropriately addressed at the DSAP stage. The Synchro sheets have not been updated to show AM/PM and scenario. To the extent practical, these have been checked and results provided in the report appear to be consistent with the appropriate Synchro sheets.
58	TIA	TIA Methodology		Add left turn phasing in the Synchro sheets provided. The Synchro sheets provided do not show the left-turn phasing (protected/permissive or protected-only).	Left turn phasing is provided on the synchro analysis spreadsheets	This would require a different Synchro report to be printed which was not done. To the extent this could be checked, there is not a reason to think there was an error.
59	TIA	TIA Methodology		For segment capacities, the applicant has assumed all segments are within an urbanized area – this is a reasonable expectation by 2052 for most segments, but the applicant also continues to use uninterrupted flow highway for roads which may have traffic signals in the future. Due to the unknowns of projecting area type and facility type, typically the existing conditions are projected in the future. Please clarify and demonstrate how impacts are to be mitigated in the interim and at full buildout.	As discussed during the March 14, 2022 meeting, the companion DSAP 2 Transportation Impact Analysis report includes the modified Roadway Segment Capacity Sheet	Comment addressed
60	TIA	TIA Methodology		SB US 17 at SR 200 Synchro should use dual left-turns; the analysis only shows a single southbound left-turn lane. Please revise to show correct configuration.	Revised as requested.	Comment addressed

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61	TIA	TIA Methodology		The analysis shows a traffic signal is expected to be needed at US 17/Pages Dairy, though it should not be installed until warranted and needed by existing traffic. Please clarify and demonstrate how impacts are to be mitigated in the interim and at full buildout.	As discussed during the March 14, 2022 meeting, a traffic signal is warranted at this time and is not a result of this development	Comment addressed
62	TIA	TIA Methodology		The analysis shows the proposed two-way stop control at Pages Dairy/Blount’s Branch is nearing capacity in the AM peak hour at buildout – any variation in traffic may require a different traffic control option in the future. Please clarify and demonstrate how impacts are to be mitigated in the interim and at full buildout.	As discussed during the March 14, 2022 meeting, the companion DSAP 2 application, specifically the Development Order, will address transportation conditions; this particular connection will not be completed until later phase(s) outside of 10 years. The development order conditions will address connections including traffic control design.	Comment addressed for CPA purposes. The applicant has removed the connection in the short term. This concern will be addressed in the DSAP #2 review process and with each subsequent PDP review process.