Number	Page(s)	•	endment (CPA21-009) - Summary of P 12/3/2021 Staff Comment	3/4/2022 Staff Comment	3/17/2022 Applicant Response	4/11/2022 Staff Comment (revised 4 28 2022)
	indicates unaddres	sed 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.		n 2/11/2011	
2		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	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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nended by Jason Iarch 11, 2022.	Comment addressed - the applicant has assisted staff in compiling the FTMS maps.

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5		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.	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	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	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
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.	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	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.		•

Natural Resources

Number	- Page(s)	Referenced Document	12/3/2021 Staff Comment	3/4/2022 Staff Comment	3/17/2022 Applicant Respor
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 v include a CHN management plan that will identify and	-
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 communi
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 prov	vided.
Public Facilit	ies		· · · ·		
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 multilane 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 DS parks location program, and the consultants are now	

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•	ne development program. The DSAP will also ative communities into account.
niites will be set forth	n in upcoming DSAP(s).
orked with parks cons	sultants and applicant to develop acceptable

site plans.

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)
13			Imobility network roads and non-mobility network	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 rem	oved to make clear that this application is only co	ncerned 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.	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 Hal management plan.	I bitat Management Plan & will be further address	ed in DSAP resubmittal and the CHN
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.	Provide acreages associated with each upland	Comment addressed: requested acreage provided.		

ing the March 14,	
the ENCPA	
emonstrate the	Comment addressed: recreational trails to
along the ENCPA	be addressed at the PDP level and will
ative has been	identify cross-sections and local
exhibit. Each future	connections to Contextual Trails Map, which
lan (PDP) will	is now part of the narrative.
cross section and	
ntextual Trails Map.	

Number	Page(s)	Referenced Document	12/3/2021 Staff Comment	3/4/2022 Staff Comment	13/17/2022 Applicant Response	4/11/2022 Staff Comment (revised 4 28 2022)
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.	develop a Final Long Term Habitat Management Plan coincident with submittal of	Comment addresed with the inclusion of th Long Term Habitat Management Plan, whic 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 addresed 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 addresed 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.	

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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 Ma Map/FLUM-6. In additio symbology indicating the T has been enlarged.
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		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.
Center, Resor greenway for	rt, and Residential Tier 1 p habitat preservation, wil	provides for compact dev dlife crossings, and passi	t the proposed land use mix is an acceptable consensus. T velopment and synergy needed to support the village centive recreation. The Applicant sought to increase Residenti required neighborhood parks will all promote walkability	ters. Acreage of these three land uses now slightly exce al Tier 2 acreage, at first by 39% and in the latest subm	ed what is now adopted. The
29	,	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, v
30	,	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 7	75% to 95% of adopted acreag
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 proposed ENCPA Master Lan has been revised to increase use to 744 acres, a difference the existing acreage of 751 a

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Naster Land Use on to the line TOD, the text labe	Comment addressed: requested changes

ving environmental lands. The proposed combination of Village he CHN itself has increased by 191 acres and provides a connected the dominant non-CHN land use, Tier 2 neighborhoods will still be

, which Staff believes is acceptable.

eage, which Staff believes is acceptable.

e the Tier 1 land	Comment addressed with the near- retoration of Tier 1 Residential land use subcategory acreage.

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32	Consistency Analysis D-9	Narrative	demonstrate how the change is consistent with applicable review criteria and how it impacts the overall land use plan. Besponse must pertain to the		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	demonstrate how the change is consistent with applicable review criteria and how it impacts the overall land use plan. Response must pertain to the	-	Response: In response to the staff request, the Tier 3 land use acreage has been increased, reducing Tier 2 land use acreage.	
34	5	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 reas maximize development efficiencies, clustering Tier 1 F 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 of or decrease the approved Em Development Program or mo and maximum intensities for category. In addition, the pro Master Land Use Plan/FLUM- modified to address the staff increase the amount of Tier 1 use categories and reduce th category.

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re accurately depicting CHN, reducing Tier 3 acreages to better enters, and shifting Tier 2 Residential land uses closer to the

Entitlement for each land use proposed ENCPA M- 6 has been aff request to er 1 and Tier 3 land the Tier 2 land use

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 nt does not increase still significant deviations from what is approved, including the increase of almost a modify the minimum 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 concurrance, Staff will engage a third party expert to work with the County and applicant to update fiscal impact analysis.

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37	6-7		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 su	bstantively restored to close t
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 th	at shows how the proximity s
39	8	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 job	s-housing ratio.
40	10	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 us and contiguous development pattern as opposed to a	

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e to adoption levels.	
y standards mirror th	e land use arrangement.

levels, which does provide for elements of compact, mixed use, sprawl pattern.

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41	10	FLUM Amendment Narrative	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." 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.	Comment addressed for CPA purposes. Staff will requ	ire a more finely-grained analys
42		FLUM Amendment Narrative	Provide data and analysis that demonstrates conformance with Policy FL.13.06 regarding Transit Oriented Development (TOD).	Comment addressed.	
43	В-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 Transportation meeting, the c 2 Transportation Impact Analy addresses the phasing program construction of the ENCPA Mo is also noted that internal con ENCPA Mobility Roads will also circulation.

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nalysis of public facilities needs and scheduling at the DSAP level.

gram including Mobility Network. It	Comment addressed for CPA purposes. Review will be required during DSAP #2 review process and during subsequent PDP TIA reviews.

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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 that the proposed southernly 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, reliving 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
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.		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 beeen 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	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 https://www.fisheries.noaa.gov/resource/map/atlant ic-sturgeon-critical-habitat-map-and-gis-data	appropriate depth without barriers to movement from the mouth of the river to the	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.

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49	26	FLUM Amendment Narrative		Consistency analysis repsonse 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.	1) Iransportation Impact Analysis clearly	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.
50	30	FLUM Amendment Narrative		Provide proposed cross sections for all mobility roads shown.	2 Application – Mobility Section includes all	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.	heen revised to provide examples including	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	minimum of 50' feet in width. The Green Ribbon connects to the regulatory St. Marys	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.

	Page(s)		endment (CPA21-009) - Summa 12/3/2021 Staff Comment	3/4/2022 Staff Comment	3/17/2022 Applicant Response	4/11/2022 Staff Comment (revised 4 28 2022)
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.
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			Please refer to Figures F1 and F2 within Appendix F of the Transportation Impact	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.

EXHIBIT D	: ENCPA	Com	oreh	ensive	Plan Am	endment	(CPA21-009) - Summary	v of Pi	roiect Commen	ts
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	Page(s)		12/3/2021 Staff Comment	3/4/2022 Staff Comment	13/17/2022 Applicant Response	4/11/2022 Staff Comment (revised 4 28 2022)
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 requrested.	Comment addressed
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.	laddress transportation conditions: this	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.