

March 18, 2022

Mr. Thad Crowe, AICP – PEO Director
Nassau County
Department of Planning and Economic Opportunity
96161 Nassau Place
Yulee, FL 32097

RE: Project Name: ENCPA Wildlight Future Land Use Map Amendment, Submittal #2
Application: CPA 21-009
ETM No.: 19-239-01-026

Dear Mr. Crowe:

In response to the comments received March 4, 2022 and appended by the County Engineering Comments March 14, 2022, we have revised the proposed Future Land Use Map amendment to more closely mirror the existing Village Center acreage between existing and proposed plans – a difference of 7 acres. As stated, the ENCPA Sector Plan boundary remains as adopted and the approved entitlement of 24,000 units and 11,000,000 square feet of non residential uses remain as adopted.

In response to staff comments from our submittal, we have repeated “Courtesy Comments” in **bold** below and highlighting responses in *italics*. Please schedule this amendment for the next available Planning and Zoning Board and Board of County Commissioners meeting for the transmittal hearing.

Please contact me at 904-642-8990 or via email at hagal@etminc.com should you require additional information or have any questions.

Sincerely,

ENGLAND-THIMS & MILLER, INC.



Lindsay Haga, AICP
Land Development – Planning Manager

Attachments:

1. Large Scale Land Use Amendment document:
 - a. Narrative
 - b. Required Attachments
 - i. Application, o/a forms, deeds
 - ii. Appendix A Environmental
 - iii. Appendix B Transportation
 - c. Referenced Attachments
 - i. Cultural Resources Summary

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Response to Comments

Comment #2

Comment partially addressed - Staff is working with Applicant to update FTMS maps and prepared comp plan amendment to adopt these maps and update the Transportation Element GOPs.

Response: The map series has been amended by Jason Gregory; see email dated March 11, 2022.

Comment #4

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.

Response: 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 #5

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.

Response: 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 #6

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.

Response: 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.

Comment #13 – Engineering

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-

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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.

Response: 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 #15 – Engineering

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 #19, 21 and 22

Provide narrative/discussion on how vegetative communities relate and conform to overall planning program/uses.

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 #23

FL.13.01.C - Application CPA21-009 define "seasonal" homes.

Response: 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.

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Comment #24

FL.13.01.D - identify "transportation hub" and define "supporting intensities and densities."

Response: 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 #25

FL.13.01.D - Text identifying TOD Overlay locations on FLUM needs to be enlarged (illegible).

Response: 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 #31

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 #32

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.

Response: 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 #33

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 #36

Comment partially addressed - fiscal impact analysis not provided.

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.

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Comment #43 – Engineering

Provide data and analysis that justifies delaying construction of the Chester Road-US 17 connection to 2052 (2040?).

Response: 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 #44

Analysis provided is deficient. Demonstrate how the I-95 interchange will facilitate implementation of the LRTP.

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 #45

Demonstrate consistency with Policy FL.13.09 regarding the St Marys Greenway, by clearly depicting 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 #47 - Engineering

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.

Response: 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 Road.

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Comment #48 - Engineering

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/atlantic-sturgeon-critical-habitat-map-and-gis-data>.

Response: The USFWS designated critical habitat for the Endangered (E) Atlantic sturgeon (Acipenser oxyrinchus) 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.

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Comment #49 - Engineering

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.

Response: 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 program.

Comment #50 - Engineering

Provide proposed cross sections for all mobility roads shown.

Response: 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 #51 - Engineering

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.

Response: 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(s).

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Comment #52 - Engineering

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.

Response: 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.

Comment #53 - Engineering

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.

Response: 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 #54- Engineering

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.

Response: 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 #55 - Engineering

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.

Response: 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 #57- Engineering

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.

Response: 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.

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Comment #58 - Engineering

For clarity, the Synchro sheets always show time period (AM/PM) and scenario (Phase 1, Buildout, etc.).

Response: Correct.

Comment #59- Engineering

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).

Response: Left turn phasing is provided on the synchro analysis spreadsheets.

Comment #60 - Engineering

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.

Response: As discussed during the March 14, 2022 meeting, the companion DSAP 2 Transportation Impact Analysis report includes the modified Roadway Segment Capacity Sheet.

Comment #61- Engineering

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.

Response: Revised as requested.

Comment #62- Engineering

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.

Response: 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 #63- Engineering

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.

Response: 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.