



August 11, 2023

Mr. Colt Schwerdt, PE
Assistant Director & City Engineer
Public Works Department
City of Port St. Lucie
121 SW Port St. Lucie Boulevard
Port St. Lucie, FL 34984

RE: P23-113 City of Port St. Lucie Text Amendment – Codification of Secondary Access Standards

Dear Mr. Schwerdt:

On behalf of multiple clients and as a land planning professional having worked within the City of Port St. Lucie for over 30 years, **I am requesting a formal workshop be held with the City of Port St. Lucie and the development community on the above topic BEFORE the proposed code changes are adopted.**

The development community strongly supports improvements that elevate the health and safety as well as convenience of residents and support the codification of development criteria that has long been overdue, HOWEVER, codification in haste without a thorough dialogue and absent of stakeholder input or consideration, can create more issues and unintended conflicts than what it's meant to solve. As with many other issues that have challenged the City, engaging stakeholders and having active dialogue leads to a much better resolution and outcome for all.

A couple brief items that justify the need for a workshop and possible amendments to the proposed ordinance changes.

1. Emergency Access VS Secondary Resident Access:

Health and safety concerns and accessibility for first responders should be paramount meaning that we should not wait until 50% of the dwelling units, emergency access should be provided from the beginning to ensure that whether there is one home or fifty homes, adequate response can be provided. When the emergency access is also the secondary access (99 units or less), mandating 'secondary access point shall be located on a different public roadway than the primary access and on different sides of the development where feasible' places a higher importance on the location of the emergency access over that of having it in place sooner.

2. The threshold of (100) units upon which a secondary resident access is mandated is too low and is not supported by good planning. We have many real world examples throughout our City, State and nationally that prove out higher unit counts are easily supported with a single main entrance. Those examples also prove out that YES at a certain number of residents, secondary and tertiary entrances are very much needed. The concern here is that an arbitrary low unit threshold is not being implemented for more efficiency and convenience for the residents but instead to force construction of adjacent public roads to the secondary access point well before those roads are required or already committed to be constructed.

In addition, the construction obligations and timing of public roadways are more appropriately handled in other agreements (Developer Agreements, DRI Orders, etc.) and at specific dwelling unit thresholds supported by traffic needs beyond an individual subdivision as well as having the appropriate number of homes to support funding of the road construction.

If (99) units is the threshold for providing (1) emergency access and then the threshold goes from (100) to infinity for requiring a secondary access for all – how does this truly address resident convenience and best practices in dispersing traffic? Per these changes, a subdivision of (100) homes would be providing the same access points as a subdivision of (1000) homes.

3. Premature cost burden on HOA and Residents:

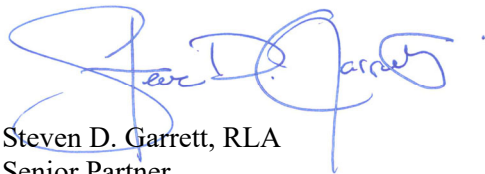
Requiring additional entrances before they are truly needed places additional cost burdens for the residents and their HOA upon turnover from the developer. The reality is that many new subdivisions are gated and by setting a lower unit threshold forces an additional gate system and operational costs well before it would be needed and possibly never needed at only (100) units.

4. Possible adjustments and/or solutions:

- a. Separate the two items: emergency access and resident access and address them specifically as unique elements which are required at different times and for different reasons;
- b. Secondary entrances: Establish a unit threshold based on rationale examples, best practices, supported by the development community and one that is defensible and provides the most benefit to the residents;
- c. Remove the requirements of public roads to be built to the secondary access and/or discuss appropriate language and timing of this that is consistent with other governing agreements and better supports proper planning and traffic management/disbursement.

There are many other examples and items of concern with the current version of the proposed ordinance changes and although they may seem like many, I feel (as in the past) a successful workshop with an engaged City staff and equally engaged development community, consensus can be reached and a much better set of changes which ultimately benefit the residents can emerge.

Respectfully,



Steven D. Garrett, RLA
Senior Partner