

## Additional Backup item 13B

From: Hymowitz, Larry <[Larry.Hymowitz@dot.state.fl.us](mailto:Larry.Hymowitz@dot.state.fl.us)>  
Sent: Friday, September 6, 2024 10:27 AM  
To: [dcpexter@commerce.fl.gov](mailto:dcpexter@commerce.fl.gov); Williams, Jana <[Jana.Williams@commerce.fl.gov](mailto:Jana.Williams@commerce.fl.gov)>; Benjamin Balcer <[BalcerB@stlucieco.org](mailto:BalcerB@stlucieco.org)>  
Cc: Martinez, Cesar <[Cesar.Martinez@dot.state.fl.us](mailto:Cesar.Martinez@dot.state.fl.us)>; Walia, Kent <[Kent.Walia@dot.state.fl.us](mailto:Kent.Walia@dot.state.fl.us)>; Peters, Victoria <[Victoria.Peters@dot.state.fl.us](mailto:Victoria.Peters@dot.state.fl.us)>; Carver, Jennifer <[Jennifer.Carver@dot.state.fl.us](mailto:Jennifer.Carver@dot.state.fl.us)>; Bush, Lois <[Lois.Bush@dot.state.fl.us](mailto:Lois.Bush@dot.state.fl.us)>; Budhu, Kelly <[Kelly.Budhu@dot.state.fl.us](mailto:Kelly.Budhu@dot.state.fl.us)>; Irene A. Szedlmayer, AICP <[szedlmayeri@stlucieco.org](mailto:szedlmayeri@stlucieco.org)>; bentonk <[bentonk@stlucieco.org](mailto:bentonk@stlucieco.org)>; Daniel Zrallack <[ZrallackD@stlucieco.org](mailto:ZrallackD@stlucieco.org)>; Patrick Dayan <[DayanP@stlucieco.org](mailto:DayanP@stlucieco.org)>; Stephanie Heidt <[sheidt@tcrpc.org](mailto:sheidt@tcrpc.org)>; Mary Savage-Dunham <[mdunham@cityofpsl.com](mailto:mdunham@cityofpsl.com)>; Bridget Kean <[BKean@cityofpsl.com](mailto:BKean@cityofpsl.com)>; Buchwald, Peter <[BuchwaldP@stlucieco.gov](mailto:BuchwaldP@stlucieco.gov)>  
Subject: St. Lucie County 24-3ESR (Neill Farm Estates) ) - FDOT District Four Review Comments

Pursuant to Section 163.3184(3), Florida Statutes (F.S.), in its role as a reviewing agency as identified in Section 163.3184(1)(c), F.S., the Florida Department of Transportation (FDOT) reviewed the proposed St. Lucie County 24-3ESR (Neill Farm Estates) comprehensive plan amendment relating to a future land use map change from Agriculture AG-5 to MXD future land Use classification with sub-area policies limiting development to residential use. The +/-421.28-acre site is located on the west side of Range Line Road, approximately 2.33 miles south of Glades Cut Off Road.

FDOT is providing the following technical assistance comments and recommendations consistent with Section 163.3168(3), Florida Statutes. These technical assistance comments will not form the basis of a challenge. These comments are intended to strengthen the County's comprehensive plan to foster a vibrant, healthy community and is designed to ensure consistency with the Community Planning Act in Chapter 163, Part II, F.S.

FDOT appreciates the early and continuing consultation and coordination proffered by the County.

Technical Assistance Comment #1

The proposed amendment does not appear to account for the projected transportation system levels of service (LOS) and system needs based upon the future land use map, and the projected integrated transportation system per Section 163.3177(6)(b)1.d, F.S.

The proposed amendment analysis does not appear to contain background traffic from amendments in process, including Rainbow Groves (23-1DRI) and concurrently transmitted OMBU Ranch (24-2ESR).

The analysis for the amendment does not identify transportation improvements proposed in the St. Lucie Transportation Planning Organization (TPO) 2045 Long Range Transportation Plan (LRTP) that are cost feasible other than by developer funding contributions. There is a limited roadway network in the 2045 LRTP to effectively and efficiently distribute vehicular trips from planned developments in the recently expanded urban service area, including previously transmitted Rainbow Groves (23-1DRI) and concurrently transmitted OMBU Ranch (24-2ESR). Furthermore, the socioeconomic data used by the TPO for traffic forecasting and needs identification does not include the population and employment from the proposed land uses for the amendment that are used to create trip productions and attractions in the traffic forecasting model. As a result, capacity needs of developments in the expanded Urban Service Area are not at this time, planned for as cost feasible in the 2045 LRTP, the Transportation Improvement Program (TIP), nor are they prioritized on the Annual List of Priority Projects (LOPP).

Only one capacity improvement (not funded for construction) needed to serve growth in the recently expanded urban service area is contained in the County's Fiscal Year (FY) 2024 Budget, including the Capital Improvement Plan for Fiscal Years 2024 through 2028, with a funding shortfall of 81.1 million dollars for Glades Cut-Off Road from Range Line Road to Selvitz Road (see below).

EXPENDITURES:	Un-Appropriated Subsequent Years					FUTURE ANTICIPATED NEEDS
	FY24 Recommended	FY 2025	FY 2026	FY 2027	FY 2028	
Arterial A (Midway Road to Orange Avenue)	\$ -	\$ -	\$ -	\$ -	\$ 1,000,000	\$ 2,000,000
Glades Cut Off Rd Widening & Improvements	\$ -	\$ 2,500,000	\$ 2,000,000	\$ 6,000,000	\$ -	\$ 81,100,000
Jenkins Road Phase 1 (from Midway to Glades Cut Off Rd)	\$ 12,000,000	\$ -	\$ -	\$ -	\$ -	\$ -
Jenkins Road Phase 2 (from Glades Cut Off Rd to Orange Ave)	\$ 1,000,000	\$ -	\$ -	\$ -	\$ -	\$ 69,000,000
Jenkins Road Phase 3 (from Orange Ave to St Lucie Blvd)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 49,000,000
Lennard Rd / Tilton Rd Drainage	\$ -	\$ 1,500,000	\$ -	\$ -	\$ -	\$ -
Midway Rd (Glades Cut Off to Jenkins) Includes Tpk Interchange	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 75,250,000
Selvitz Road Improvements (Glades Cut Off Rd to Edwards Rd)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Walton Road Sidewalk (Lennard Rd to Green River Pkwy)	\$ 1,500,000	\$ -	\$ -	\$ -	\$ -	\$ -
North County Airport Connector (I-95 to King's Hwy)	\$ 50,000	\$ -	\$ -	\$ 2,000,000	\$ 2,000,000	\$ 50,000,000
Selvitz Rd and Glades Cut Off Rd Intersection Improvements	\$ -	\$ 8,500,000	\$ 8,500,000	\$ -	\$ -	\$ 17,000,000
Oleander Ave Sidewalk (South Market Ave to Edwards Rd)	\$ 1,000,000	\$ 150,000	\$ -	\$ 450,000	\$ -	\$ -
Edwards Rd Widening (Jenkins Rd to 25th St)	\$ 1,500,000	\$ 2,000,000	\$ 2,000,000	\$ 2,000,000	\$ 1,000,000	\$ 15,000,000
St. Lucie West at Peacock Blvd Intersection (City of PSL)	\$ 1,500,000	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Total Budgeted Expenses</b>	<b>\$ 18,550,000</b>	<b>\$ 14,650,000</b>	<b>\$ 12,500,000</b>	<b>\$ 10,450,000</b>	<b>\$ 3,000,000</b>	<b>\$ 356,350,000</b>

The Department is concerned about the ability of the I-95 (SR-9) corridor to accommodate future traffic growth. The corridor is currently a six-lane interstate facility, and it is planned to be widened to be an eight-lane facility in accordance with the FDOT Strategic Intermodal System (SIS) 2045 Cost Feasible Plan and the TPO's 2045 Cost Feasible LRTP. The 2045 projected background AADT growth on I-95 south of Okeechobee Road is 123,050, which represents approximately 75% of the capacity of the roadway, based on the Department's "D" level of service volume target. Longer distance traffic generated from proposed developments related to this review have the cumulative potential to impact I-95 and many other corridors of statewide and regional importance by 2045.

#### Recommendations for Technical Assistance Comment #1

1. The County can address this comment by demonstrating how it will meet the identified needs of the projected transportation system and advance the purpose of the Transportation Element and the other elements of the comprehensive plan, consistent with 163.3177(6)(b)1.e, F.S. This can be accomplished through intergovernmental coordination with the TPO, the City of Port St. Lucie, and FDOT involving a comprehensive study of future growth potential in the recently expanded urban service area. It is understood that such a study is currently in progress. It is recommended that current and future amendments within the expanded Urban Service Area incorporate the results of the study for decision-makers to consider prior to pending amendment adoptions and future amendment transmittals.

2. The County could periodically monitor the SIS 2035-2050 Long Range Cost Feasible Plan ([https://fdotwww.blob.core.windows.net/sitefinity/docs/default-source/planning/systems/programs/mspi/pdf/sis\\_cfp\\_2035-2050\\_pdc.pdf?sfvrsn=907d4836\\_1](https://fdotwww.blob.core.windows.net/sitefinity/docs/default-source/planning/systems/programs/mspi/pdf/sis_cfp_2035-2050_pdc.pdf?sfvrsn=907d4836_1)) to assist the Department in ensuring that priorities and future plans for SIS roadways (I-95, Florida Turnpike, and State Road 70) are accounting for the transportation needs resulting from the County's future land use changes.

#### Technical Assistance Comment #2

Changes to other elements of the comprehensive plan to achieve consistency with the future land use change are not included with the transmittal package. Per Section 163.3177(2), F.S., the several elements of the comprehensive plan shall be consistent. Where data is relevant to several elements, consistent data shall be used and each map depicting future conditions must reflect the principles, guidelines, and standards within all elements.

For example, Table 6 on page 21 of the County staff report indicates that Range Line Road from Crosstown Parkway to Glades Cut-Off Road will have a volume to capacity ratio (v/c) of 2.65, indicating that the projected volume is more than double the two-lane capacity. The projected volume appears to exceed even a six-lane capacity. This forecasted need renders the amendment internally inconsistent with the Transportation Element Map TRN-2 as shown on page 18 of the County's amendment staff report, since this map only anticipates a need for four lanes on Range Line Road. Glades Cut-off Road from Range Line Road to Reserve Boulevard may also need to be six lanes rather than four.

#### Recommendation for Technical Assistance Comment #2

The County should consider amendments to the Transportation and Capital Improvements Elements of the Comprehensive Plan as part of the adopted amendment consistent with Florida Statutes 163.3177(3)(a), to account for the future transportation facility network and services and costs needed to serve the proposed land uses at the adopted level of service standards. This may include at a minimum, but not be limited to, identifying

mitigation (infrastructure improvements) needed to resolve level of service deficiencies, revising Map TRN-2 and other appropriate components of the Comprehensive Plan Map Series, Transportation Element, and Capital Improvements Element.

### Technical Assistance Comment #3

The proposed amendment does not appear to be consistent with Florida Statutes 163.3180(5)(d) and County Policies 1.1.2.2 and 1.1.6.3, which indicates that transportation facilities shall be in place and available to serve new development no later than the issuance of the certificate of occupancy or its functional equivalent such that there is no reduction in the LOS for these facilities and services. Sub-area Policy #16 and elsewhere in the amendment indicates that the County will be relying on developer funded improvements to address level of service deficiencies. This mechanism contributes to, but does not ensure, that needed transportation infrastructure will be in place prior to or concurrent with the impacts of development. Since developments are primarily only responsible for impact fees and a proportion of the costs associated with facilities they impact, the County could become burdened with unfunded costs that are not being accounted for and that may impact the implementation timing of needed infrastructure.

### Recommendation for Technical Assistance Comment #3

The Department recommends the County consider amending the Transportation and Capital Improvements Elements as part of the adoption of the amendment to incorporate the relevant long-term transportation facilities and service needs (funded and unfunded) necessary to support the land use decisions in the expanded Urban Service Area. This recommendation supports the requirements contained in Florida Statute 163.3177(3)(a).

We appreciate the opportunity to review the proposed amendments. As a reminder, should the amendments be adopted, we kindly request that an electronic copy of the adopted amendments, along with the supporting data and analysis, be transmitted within ten (10) working days after the second public hearing to [d4-planningreviews@dot.state.fl.us](mailto:d4-planningreviews@dot.state.fl.us).

Please don't hesitate to contact me if you have any questions or need assistance with any of the recommendations. We appreciate hearing from the County prior to adoption regarding the status of our comments.



**Larry Hymowitz**

Planning Specialist, Policy and Mobility Planning Section

Planning & Environmental Management - FDOT District Four

p: (954) 777-4663 f: (954) 677-7892

a: 3400 W. Commercial Boulevard, Ft. Lauderdale, FL 33309

e: [larry.hymowitz@dot.state.fl.us](mailto:larry.hymowitz@dot.state.fl.us) w: [www.dot.state.fl.us](http://www.dot.state.fl.us)



Together.our.actions.have.the.power.to.save.lives\*



September 13, 2024

The Honorable Cathy Townsend  
Chair, St. Lucie County  
Board of County Commissioners  
2300 Virginia Avenue  
Fort Pierce, Florida, 34982

Dear Chairperson Townsend:

The Florida Department of Commerce (FloridaCommerce) has reviewed St. Lucie County's proposed comprehensive plan amendment (Amendment No. 24-03ESR), received on August 16, 2024, pursuant to the expedited state review process in Section 163.3184(2) and (3), Florida Statutes (F.S.). We have identified no comment related to adverse impacts to important state resources and facilities within FloridaCommerce's authorized scope of review.

We are, however, providing a technical assistance comment consistent with Section 163.3168(3), F.S. The technical assistance comment will not form the basis of a challenge. It is offered either as a suggestion which can strengthen the County's comprehensive plan in order to foster a vibrant, healthy community or are technical in nature and designed to ensure consistency with the Community Planning Act in Chapter 163, Part II, F.S. The technical assistance comment is:

*Technical Assistance Comment 1): Intergovernmental Coordination: Transportation Impacts*

*The Department encourages the County to coordinate with the City of Port St. Lucie and FDOT staff to formulate a mitigation plan or conditions of approval that addresses the City's concerns about impacts to City roads, needed County road improvements, and the need for the sub-area policies to require new traffic studies with any proposed changes.*

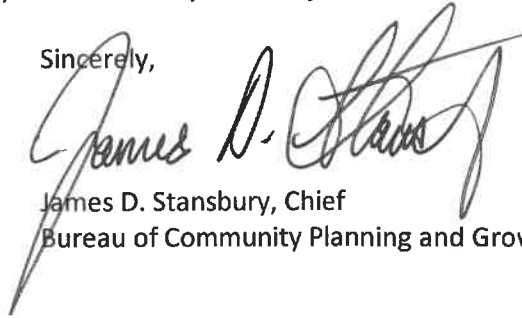
The County should act by choosing to adopt, adopt with changes, or not adopt the proposed amendment. For your assistance, we have enclosed the procedures for adoption and transmittal of the comprehensive plan amendment. In addition, the County is reminded that:

- Section 163.3184(3)(b), F.S., authorizes other reviewing agencies to provide comments directly to the County. **If the County receives reviewing agency comments and they are not resolved, these comments could form the basis for a challenge to the amendment after adoption.**
- **The second public hearing**, which shall be a hearing on whether to adopt one or more comprehensive plan amendments, **must be held within 180 days** of your receipt of agency comments or the amendment shall be **deemed withdrawn** unless extended by agreement with notice to FloridaCommerce and any affected party that provided comment on the amendment pursuant to Section 163.3184(3)(c)1., F.S.
- **The adopted amendment must be transmitted to FloridaCommerce within ten working days after the second public hearing pursuant to 163.3184(3)(c)2., F.S.** Under Section

163.3184(3)(c)2. and 4., F.S., the **amendment effective date** is 31 days after FloridaCommerce notifies the County that the amendment package is complete or, if challenged, until it is found to be in compliance by FloridaCommerce or the Administration Commission.

If you have any questions concerning this review, please contact Jana Williams, Regional Planning Administrator, by telephone at (850)-717-8483 or by email at [jana.williams@commerce.fl.gov](mailto:jana.williams@commerce.fl.gov).

Sincerely,



James D. Stansbury, Chief  
Bureau of Community Planning and Growth

JDS/jw

Enclosure(s): Procedures for Adoption

cc: Kori Benton, Planning Manager, St. Lucie County  
Thomas Lanahan, Executive Director, Treasure Coast Regional Planning Council



## SUBMITTAL OF ADOPTED COMPREHENSIVE PLAN AMENDMENTS

### FOR EXPEDITED STATE REVIEW

Section 163.3184(3), Florida Statutes

**NUMBER OF COPIES TO BE SUBMITTED:** Please submit electronically using FloridaCommerce’s electronic amendment submittal portal “**Comprehensive Plan and Amendment Upload**” (<https://fldeo.my.salesforce-sites.com/cp/>) or submit three complete copies of all comprehensive plan materials, of which one complete paper copy and two complete electronic copies on CD ROM in Portable Document Format (PDF) to the State Land Planning Agency and one copy to each entity below that provided timely comments to the local government: the appropriate Regional Planning Council; Water Management District; Department of Transportation; Department of Environmental Protection; Department of State; the appropriate county (municipal amendments only); the Florida Fish and Wildlife Conservation Commission and the Department of Agriculture and Consumer Services (county plan amendments only); and the Department of Education (amendments relating to public schools); and for certain local governments, the appropriate military installation and any other local government or governmental agency that has filed a written request.

**SUBMITTAL LETTER:** Please include the following information in the cover letter transmitting the adopted amendment:

\_\_\_\_\_ State Land Planning Agency identification number for adopted amendment package;

\_\_\_\_\_ Summary description of the adoption package, including any amendments proposed but not adopted;

\_\_\_\_\_ Identify if concurrency has been rescinded and indicate for which public facilities. (Transportation, schools, recreation and open space).

\_\_\_\_\_ Ordinance number and adoption date;

\_\_\_\_\_ Certification that the adopted amendment(s) has been submitted to all parties that provided timely comments to the local government;

\_\_\_\_\_ Name, title, address, telephone, FAX number and e-mail address of local government contact;

\_\_\_\_\_ Letter signed by the chief elected official or the person designated by the local government.

**ADOPTION AMENDMENT PACKAGE:** Please include the following information in the amendment package:

\_\_\_\_\_ In the case of text amendments, changes should be shown in strike-through/underline format.

\_\_\_\_\_ In the case of future land use map amendments, an adopted future land use map, **in color format**, clearly depicting the parcel, its future land use designation, and its adopted designation.

\_\_\_\_\_ A copy of any data and analyses the local government deems appropriate.

**Note:** If the local government is relying on previously submitted data and analysis, no additional data and analysis is required;

\_\_\_\_\_ Copy of the executed ordinance adopting the comprehensive plan amendment(s);

Suggested effective date language for the adoption ordinance for expedited review:

"The effective date of this plan amendment, if the amendment is not timely challenged, shall be 31 days after the state land planning agency notifies the local government that the plan amendment package is complete. If the amendment is timely challenged, this amendment shall become effective on the date the state land planning agency or the Administration Commission enters a final order determining this adopted amendment to be in compliance."

\_\_\_\_\_ List of additional changes made in the adopted amendment that the State Land Planning Agency did not previously review;

\_\_\_\_\_ List of findings of the local governing body, if any, that were not included in the ordinance and which provided the basis of the adoption or determination not to adopt the proposed amendment;

\_\_\_\_\_ Statement indicating the relationship of the additional changes not previously reviewed by the State Land Planning Agency in response to the comment letter from the State Land Planning Agency.



July 25, 2024

St. Lucie County Board of County Commissioners  
2300 Virginia Ave.  
Fort Pierce, FL 34982

**Re: St. Lucie County Future Land Use Map Amendment (FLUMA) 2211-000019 - Neill Farms Estates**

Dear Chair Townsend, Vice-Chair Dzadovsky and County Commissioners:

The City of Port St. Lucie (City) has been reviewing the submittals for the Neill Farm Estates Comprehensive Plan amendment that is scheduled for a transmittal hearing at the August 6, 2024, St. Lucie County Board of County Commissioners meeting. As stated in prior letters to the County, the City is concerned that the FLUMA is moving forward in the County before the City's concerns have been mitigated.

The City's immediate concerns relate to the disconnect between the FLUMA and the County's existing long range transportation plan. The traffic study associated with the FLUMA shows segments of County roads failing in 2045. Specifically, the applicant's traffic study identifies two roadway segments on Range Line Road and one roadway segment on Glades Cut Off Road that are expected to operate below the Level of Service threshold requirements by 2045. Table 9 from the TIA is attached for your use and information. There are no proposed improvements to Range Line Road in the County's existing long range transportation plan other than a PD&E study in 2031.

Policy 2.1.2.2 of the County's Transportation Element states that the County will review all proposed developments for consistency with the County's comprehensive plan and require coordination of traffic mobility plans and multi-modal transportation improvements with land use, right-of-way, and infrastructure plans before development approval.

Objective 2.1.1 of the County's Comprehensive Plan states that the county's transportation system shall be reviewed in coordination with any requested changes to the County's Future Land Use Element. A report on the impacts to the system brought about by any land use change shall be prepared and presented to the Board of County Commissioners as part of the review of the land use change.

Currently, there is not a concurrent modification to the long-range transportation plan to support the proposed FLUMA. Instead, the FLUMA relies on City roadway improvements to provide the capacity and the connectivity needed to support the project.<sup>1</sup>

While the City is supportive and appreciative of the County's efforts to limit impacts by requiring subarea policies within the proposed FLUMA that restrict the residential development density to 1,263 units of age restricted single family units (or 3 units/per acre), the City respectfully requests that the policies also contain a provision that requires a revised traffic impact analysis and coordination with the City on the review of future traffic studies in the event there is modification to the density cap or land use.

Lastly, in terms of future applications regarding this project, the City has concerns about the proposed reliance on the County's proportionate share program to address traffic impacts. First, all the roadways necessary to support this project long term are not currently identified in the County's long range transportation plan and CIP. These improvements are not planned to be available to coincide with the impacts of the development. Second, even if all of this information was currently contained in the County's regulatory documentation, the City is not a party to the County's proportionate fair share program. It is not clear how impacts to City roadways will be addressed under the County's proportionate fair share program. With the numerous projects pending west of Range Line Road, this is the opportunity for the County to require all developers to provide for a future north-south roadway at the westernmost boundary of their projects and the City respectfully suggests that this should be one of the conditions of approval for these projects. The expansion of a grid network of roadways for development going west will aid in the concerns of overloading any one roadway in the future.

The City looks forward to discussing how to bridge these gaps with the County consistent with Policy 8.1.1.3 of the County's Intergovernmental Coordination Element of its Comprehensive Plan. The City appreciates the County's willingness to work with the City on the review of projects that have interjurisdictional impacts and we look forward to further collaboration. Given the concerns the City has with this application, the City respectfully requests the County postpone the public hearing on the transmittal of this amendment to the Florida Department of Commerce until City staff, County staff, and the applicant have agreed to a mitigation plan or a condition of approval that addresses the City's concerns about impacts to City roads, needed County road

---

<sup>1</sup> For example, one of the proposed sub-area policies for the FLUMA indicates that the County will not issue residential building permits for the project until such time as S.W. Discovery Way is open for public use as a minimum two (2) lane roadway from its current terminus east of Range Line Road to Range Line Road. SW Discovery Way is part of the City's SW roadway network and is not currently constructed yet. This project specifically indicates it will be using it.

SLC BOCC  
Page 3  
July 22, 2024

improvements, and the need for the sub-area policies to require new traffic studies with any proposed changes.

Sincerely,

**Mary Savage-Dunham**

Mary F. Savage-Dunham, AICP, CFM  
Director-Planning & Zoning

Attachment

cc: Jesus Merejo, City Manager  
Teresa Lamar-Sarno, Assistant City Manager  
Richard Berrios, City Attorney  
Elizabeth Hertz, Senior Deputy City Attorney  
Terrell Arline, Esquire  
Colt Schwerdt, P.E., Public Works Director & City Engineer  
Diana Spriggs, P.E. Assistant Director Public Works  
George Landry, St. Lucie County Administrator  
Mayte Santamaria, Deputy County Administrator II  
Benjamin Balcer, AICP, St. Lucie County Planning and Development Services Director  
Patrick Dayan, P.E. St. Lucie County Public Works Director  
Kori Benton, SLC Planning & Development Services  
Peter Buchwald, SLC TPO  
Larry Hymowitz, FDOT  
James D. Stansbury, Chief, Bureau of Community Planning and Growth, FDEO

**NEILL FARMS FLUA TRAFFIC STUDY**

05/06/2024

**TABLE 9  
2045 TOTAL TRAFFIC ANALYSIS**

ROADWAY	FROM	TO	PROG. LANES	CAPACITY	PEAK DIR.	V/C RATIO	MEET LOS?	MITIGATION
BECKER RD	RANGLINE RD	N/S A	4-LANES	1,850	530	0.29	YES	
BECKER RD	N/S A	N/S B	4-LANES	1,850	630	0.34	YES	
BECKER RD	N/S B	COMMUNITY BLVD	6-LANES	2,730	1,266	0.46	YES	
N/S A	BECKER RD	PAAR DR	4-LANES	1,850	166	0.09	YES	
N/S A	PAAR DR	MARSHALL PKWY	4-LANES	1,850	419	0.23	YES	
N/S A	MARSHALL PKWY	DISCOVERY WAY	4-LANES	1,850	603	0.33	YES	
N/S A	DISCOVERY WAY	GATLIN BLVD	4-LANES	1,850	777	0.42	YES	
GATLIN BLVD/ TRADITION PKWY	RANGLINE RD	N/S A	4-LANES	1,850	786	0.42	YES	
GATLIN BLVD/ TRADITION PKWY	N/S A	COMMUNITY BLVD	4-LANES	1,850	1,380	0.75	YES	
CROSSTOWN PKWY	RANGELINE RD	N/S A	4-LANES	1,850	1,589	0.86	YES	
CROSSTOWN PKWY	N/S A	VILLAGE PKWY	4-LANES	1,850	1,671	0.90	YES	
RANGELINE RD	MARTIN HWY	BECKER RD	2-LANES	1,080	943	0.87	YES	
RANGELINE RD	BECKER RD	PAAR DR	2-LANES	1,080	948	0.88	YES	
RANGELINE RD	PAAR DR	MARSHALL PKWY	2-LANES	1,080	855	0.79	YES	
RANGELINE RD	MARSHALL PKWY	DISCOVERY WAY	2-LANES	1,080	993	0.92	YES	
<b>RANGELINE RD</b>	<b>DISCOVERY WAY</b>	<b>TRADITION PKWY</b>	<b>2-LANES</b>	<b>1,080</b>	<b>1,106</b>	<b>1.02</b>	<b>NO</b>	<b>PROP SHARE</b>
<b>RANGELINE RD</b>	<b>TRADITION PKWY</b>	<b>CROSSTOWN PKWY</b>	<b>2-LANES</b>	<b>1,080</b>	<b>1,664</b>	<b>1.54</b>	<b>NO</b>	<b>PROP SHARE</b>
<b>RANGELINE RD</b>	<b>CROSSTOWN PKWY</b>	<b>GLADES CUT-OFF RD</b>	<b>2-LANES</b>	<b>1,070</b>	<b>2,871</b>	<b>2.68</b>	<b>NO</b>	<b>PROP SHARE</b>
<b>GLADES CUT-OFF RD</b>	<b>RANGELINE RD</b>	<b>RESERVE BLVD</b>	<b>4-LANES</b>	<b>1,850</b>	<b>1,996</b>	<b>1.08</b>	<b>NO</b>	<b>PROP SHARE</b>
DISCOVERY WAY	RANGELINE RD	N/S A	4-LANES	1,850	316	0.17	YES	
DISCOVERY WAY	N/S A	N/S B	4-LANES	1,850	448	0.24	YES	
DISCOVERY WAY	N/S B	COMMUNITY BLVD	4-LANES	1,850	992	0.54	YES	
MARSHALL PKWY	RANGELINE RD	N/S A	2-LANES	1,110	320	0.29	YES	
MARSHALL PKWY	N/S A	N/S B	4-LANES	1,850	743	0.40	YES	
MARSHALL PKWY	N/S B	COMMUNITY BLVD	4-LANES	1,850	778	0.42	YES	

**From:** [Hymowitz, Larry](#)  
**To:** [Irene Szedlmayer](#); [Memering, Alex](#)  
**Cc:** [bentonk](#); [Leo Giangrande](#); [Walia, Kent](#); [Thuha Nguyen](#); [Wong, Chon](#)  
**Subject:** RE: Rainbow Groves Traffic Impact Analysis (FLUMA-2209-000016) SLC 23-01DRI  
**Attachments:** [image003.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)

---

FDOT staff has completed its review of the revised Traffic Impact Analysis (TIA) for Rainbow Groves Land Use Amendment (dated September 3, 2024) and offers the following follow-up comments, keeping the same numbering scheme as the previous submittal.

**Comment 1.** Total trip distributions from the site: With the latest changes, the distributions north of project add up to 63% (17.5%+35%+8%+2.5%), resulting in total project's distributions of 103%. Please revise. In addition, analysis tables have not been revised to reflect the distributions.

**Comment 2b.** Project assignments: The errors for the segments noted in the previous 2b comment iteration have been addressed. Although some minor errors are in place, they do not impact the analysis results.

**Comment 2d.** 2045 volume adjustments: For the segments that show adjustments, the "Total PH (dir) Background Trips" are calculated incorrectly. Also, note that there are several segments that have "2023 PM Existing PH (dir)" volumes higher than "2045 PH (dir) Background", which need to be adjusted. They are:

- Segment 15 (California Blvd from St. Lucie West Blvd to Heatherwood Blvd)
- Segment 17 (Carlton Rd from Okeechobee Rd to Glades Cut-off Rd)
- Segment 20 (Commerce Center Dr from St. Lucie West Blvd to Glades Cut-off Rd)
- Segment 22 (Crosstown Pkwy from California Blvd to Bayshore Blvd)
- Segment 28 (Edwards Rd from Selvitz Rd to 25<sup>th</sup> St)
- Segment 34 (Gatlin Blvd from I-95 to Rosser Blvd)
- Segment 38 (Glades Cut-off Rd from Commerce Center Dr to Reserve Blvd)
- Segment 40 (Glades Cut-off Rd from Carlton Rd to Range line Rd)
- Segment 54 (Martin Hwy from High Meadows Ave to Mapp Rd)

Segment 61 (Midway Rd from Oleander Ave to US-1)

- Segment 67 (Midway Rd from Glades Cut-off Road to E Torino Pkwy)
- Segment 68 (Midway Rd from W of Selvitz Rd to Selvitz Rd)
- Segment 75 (Okeechobee Rd from Bluefield Rd to Carlton Rd)
- Segment 79 (Oleander Ave from Midway Rd to Kitterman Rd)
- Segment 87 (Selvitz Rd from Glades Cut-off Rd to Edward Rd)
- Segment 109 (Community Blvd from Tradition Pkwy to Discovery Wy)

**Comment 2e.** Service volume capacity: The previously mentioned segments have been corrected. Please correct the service volume threshold for Florida's Turnpike to be 4,070 (peak hour peak direction LOS D in an urban area for a 4-lane limited access facility). This is based on the area-type information received from the Florida Turnpike Enterprise, and the threshold from FDOT's 2023 Multimodal Quality Level of Service Handbook.

**Comment 3.** Color coding in the maps and tables: The County should ensure that the applicant makes the necessary corrections once all errors are corrected.

**Comment 5.** The 2045 daily analysis: There are several errors in the table that need to be corrected. Some examples are below:

- The "Lanes Planned + Committed" is incorrect; all I-95 segments should be 6-ln to 8-ln as noted in PDF page 8.
- The service volume thresholds for segments of I-95 and Florida's Turnpike should be 163,400 and 82,200, respectively (based on FDOT's 2023 Multimodal Quality Level of Service Handbook's LOS D threshold for 8-lane and 4-lane limited access facilities in an urban area).
- The "2045 Adjusted Daily Project + Background PM Build-out" column should be "2045 Adjusted Daily Project + Background Daily Build-out", and its data should be corrected.

The Department requests that the final TIA be provided to the Department upon final acceptance by the County. Review and commenting should be complete from the Department's perspective upon recommended corrections being performed. The Department would appreciate additional review opportunities should there be any future changes to the proposed intensity of the development.

Thank you for the opportunity to review.





*Together our actions have the power to save lives!*



---

**From:** Irene Szedlmayer <szedlmayeri@stlucieco.org>  
**Sent:** Wednesday, September 11, 2024 2:18 PM  
**To:** Hymowitz, Larry <Larry.Hymowitz@dot.state.fl.us>  
**Cc:** Kori Benton <bentonk@stlucieco.org>; Mike McCarty <mike@mccartylandplanning.com>  
**Subject:** Rainbow Groves Traffic Impact Analysis (FLUMA-2209-000016) SLC 23-01DRI

**EXTERNAL SENDER: Use caution with links and attachments.**

Good afternoon, Larry:

Giangrande Engineering and Planning forwarded the most recent Traffic Impact Analysis for the Rainbow Groves Future Land Use Map amendment on September 3, 2024. The adoption public hearing is scheduled for October 1, 2024 before the Board of County Commissioners.

Is FDOT intending to submit any additional comments on the latest TIA? If yes, can you estimate when we might receive them?

*Thank you!*

**Irene A. Szedlmayer, AICP | Senior Planner | Planning and Development Services**  
Ph: 772-462-1562 | 2300 Virginia Ave. Fort Pierce 34982



---

**From:** Leo Giangrande <[leo@gep-llc.com](mailto:leo@gep-llc.com)>  
**Sent:** Tuesday, September 3, 2024 1:36 PM  
**To:** Hymowitz, Larry <[Larry.Hymowitz@dot.state.fl.us](mailto:Larry.Hymowitz@dot.state.fl.us)>  
**Cc:** Benjamin Balcer <[BalcerB@stlucieco.org](mailto:BalcerB@stlucieco.org)>; Walia, Kent <[Kent.Walia@dot.state.fl.us](mailto:Kent.Walia@dot.state.fl.us)>; Thuha Nguyen <[thuha.nguyen@viaplanning.com](mailto:thuha.nguyen@viaplanning.com)>; Mayte Santamaria <[santamariam@stlucieco.org](mailto:santamariam@stlucieco.org)>; Daniel Zrallack <[ZrallackD@stlucieco.org](mailto:ZrallackD@stlucieco.org)>; Mike McCarty <[mike@mccartylandplanning.com](mailto:mike@mccartylandplanning.com)>; Kori Benton <[bentonk@stlucieco.org](mailto:bentonk@stlucieco.org)>; Patrick Dayan <[DayanP@stlucieco.org](mailto:DayanP@stlucieco.org)>; Memering, Alex <[Alex.Memering@kimley-horn.com](mailto:Alex.Memering@kimley-horn.com)>  
**Subject:** RE: Rainbow Groves Traffic Impact Analysis - Follow-up Comments

**SECURITY WARNING:** This email originated from outside the County systems. Please show caution when clicking links or opening attachments unless you recognize the sender and know the content is safe.

Good afternoon team

<https://gep-llc.sharefile.com/d-sbd6d5511c20946d5a4932eaebf2962bd>

I hope everyone is well. I want to thank the continued help with DOT. The Friday afternoon clarifications were extremely helpful. We went through each segment and altered many of the lane conditions as well as service capacity volumes for consistency. I believe we addressed everyone's concerns hopefully

I'm always available for any questions. We appreciate everyone's time and input

**Leo Giangrande, PE**  
Principal



**Giangrande Engineering & Planning**

(O) 772-888-9076

(C) 703-999-8972

710 SE Ocean Blvd, Stuart, FL 34994

[www.gep-llc.com](http://www.gep-llc.com)

---

**From:** Hymowitz, Larry <[Larry.Hymowitz@dot.state.fl.us](mailto:Larry.Hymowitz@dot.state.fl.us)>  
**Sent:** Tuesday, August 20, 2024 8:42 AM  
**To:** Leo Giangrande <[leo@gep-llc.com](mailto:leo@gep-llc.com)>  
**Cc:** Benjamin Balcer <[BalcerB@stlucieco.org](mailto:BalcerB@stlucieco.org)>; Walia, Kent <[Kent.Walia@dot.state.fl.us](mailto:Kent.Walia@dot.state.fl.us)>; Thuha Nguyen <[thuha.nguyen@viaplanning.com](mailto:thuha.nguyen@viaplanning.com)>; Mayte Santamaria <[santamariam@stlucieco.org](mailto:santamariam@stlucieco.org)>; Daniel Zrallack <[ZrallackD@stlucieco.org](mailto:ZrallackD@stlucieco.org)>; Mike McCarty <[mike@mccartylandplanning.com](mailto:mike@mccartylandplanning.com)>; Kori Benton <[bentonk@stlucieco.org](mailto:bentonk@stlucieco.org)>; Dayan, Patrick <[DayanP@stlucieco.org](mailto:DayanP@stlucieco.org)>; Memering, Alex <[Alex.Memering@kimley-horn.com](mailto:Alex.Memering@kimley-horn.com)>  
**Subject:** RE: Rainbow Groves Traffic Impact Analysis - Follow-up Comments

Please see the following comments as a follow-up to the meeting on August 19, 2024. As mentioned in the meeting, please let us know if there are any questions.

FDOT staff has completed its review of the revised Traffic Impact Analysis for Rainbow Groves Land Use Amendment (dated July 19, 2024) and offers the following follow-up and new comments:

1. Initial Comment (July 11, 2024): The trip distributions seem reasonable, as they are generally closer to the preliminary model outputs. One revision is needed. The 60% for the segment immediately north of the site seems to be less than that total percentages distributed from there (18.5% to Crosstown Parkway + 35% to Glades Cut-off Road + 8% to Range Line Road + 2.5% to Glades Cut-off Road = 64%). Please revise.

**Response (July 19, 2024): Trip distribution tables have been updated thought the report to reflect the 64% distribution north of the site.**

*FDOT follow-up Comment: Comment not adequately addressed. With the 64% distribution to the north results the total project's distributions of 104%. Please revise.*

- 2) Initial Comment: There are several errors in the tables on PDF pages 18 to 21. They are:
  - a. Lane Configuration: One example is on PDF page 18, segment 26 (East Torino Parkway from Cashmere Boulevard to Torino Parkway) which should be a 2-lane roadway.

**Response: Item has been revised.**

*FDOT follow-up Comment: Comment addressed.*

- b. Project Assign: One example is on PDF page 18, segment 44 (I-95 from Okeechobee Rd to Midway Rd) which should be 10%.

**Response: Item has been revised. All distributions have been updated as well.**

*FDOT follow-up Comment: Comment partially addressed. Please note that the segment noted in the comment is just one example. There are many other segments for which "project assign" is inconsistent with the maps. Some errors are noted below; please double check all tables*

*PDF page 19:*

- *Segment 32 (Florida's Turnpike from Okeechobee Rd to Indian River County line) should be 5%*
- *Segment 35 (Florida's Turnpike from Martin County line to Becker Rd) should be 6%*
- *Segment 47 (I-95 from St. Lucie West Blvd to Midway Road) should be 5%*
- *Segment 70 (Midway Rd from W of Selvitz to Selvitz Rd) should be 16%*
- *Segment 71 (Midway Rd from Selvitz Rd to Christianson Rd) should be 16%*
- *Segment 74 (Okeechobee Rd from Shinn Rd to Florida's Turnpike) should be 8%*

*PDF page 21: Segment 69 (Okeechobee Rd from Florida's Turnpike to Kings Hwy) should be 12%*

- c. Project Trips: One example is on PDF page 18, segment 1 (25th Street NB from Midway Rd to Bell Ave) should be 84 (2.5% of 3,377) and not 79.

**Response: Item has been revised.**

*FDOT follow-up Comment: Comment addressed.*

- d. 2045 Volume Adjustment: One example is on PDF page 20, segment 9 (Becker Rd from Athena Dr to Florida's Turnpike), the 2045 TCRPM volume is 16% higher than the 2023 volume. One suggestion is to calculate the 2045 peak hour peak direction by applying this percentage to the 2023 peak hour peak direction volume to get 1,485. The project trips can then be added to this number to determine the 2045 total peak hour peak direction volume.

**Response: Item has been revised.**

*FDOT follow-up Comment: Comment not addressed. The adjustment should be made prior to adding the trips from Oak Ridge and Rainbow Groves developments.*

- e. Service Volume Capacity: One example is on PDF page 20, segment 13 (Becker Rd from I-95 to Range Line Rd).

**Response: Item has been revised. All service volumes have been updated as well.**

*FDOT follow-up Comment: Comment partially addressed. Please note that the above segment is one example. Please check and verify all segments. Some examples include in PDF page 21:*

- Segment 38 (Glades Cut Off Rd from Commerce Center Dr to Reserve Blvd)
- Segment 39 (Glades Cut Off Rd from Reserve Blvd to Range Line Rd)
- Segment 77 (Port St. Lucie Blvd from Becker Rd to Paar Dr)
- Segment 96 (Range line Rd from Galdes Cut Off Rd to Midway Rd)
- Segment 98 (Tradition Pkwy from Village Pkwy to Range Line Rd)

- 3) Initial Comment: Once all the updates are made, please recheck and update the color coding in the maps and tables accordingly.

**Response: All tables and exhibits have been updated.**

*FDOT follow-up Comment: Comment not fully addressed. Please make the appropriate changes as the tables and maps still have some incorrect information.*

- 4) Initial Comment: Please correct Rainbow Groves Project Trips "AADT" in Table 8 of PDF page 22.

**Response: All AADT updated.**

*FDOT follow-up Comment: Comment addressed.*

- 5) Initial Comment : Please include the 2045 Daily analysis.

**Response: Weekday**

*FDOT Follow-up Comment: Comment not addressed. Please include the 2045 Daily analysis as agreed during the methodology correspondence dated November 28, 2023.*

- 6) New Comment: Please include analysis for I-95 and Florida's Turnpike segments in PDF page 21, as it is missing.

Thank you.



*Together our actions have the power to save lives!*



-----Original Appointment-----

**From:** Kori Benton <[bentonk@stlucieco.org](mailto:bentonk@stlucieco.org)>

**Sent:** Tuesday, August 13, 2024 4:06 PM

**To:** Kori Benton; Dayan, Patrick; Memering, Alex; Leo Giangrande; Mike McCarty; Hymowitz, Larry

**Cc:** Benjamin Balcer; Walia, Kent; Thuha Nguyen; Mayte Santamaria; Daniel Zrallack

**Subject:** Rainbow Groves Traffic Impact Analysis - Updated Review Discussion

**When:** Monday, August 19, 2024 3:00 PM-3:45 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** Microsoft Teams Meeting

<https://gep-llc.sharefile.com/public/share/web-s79ccbf1c12eb4b3da590b70040e1f594>

---

**Microsoft Teams** [Need help?](#)

[Join the meeting now](#)

Meeting ID: 247 593 420 316

Passcode: YGTxjj

---

## Dial in by phone

[+1 772-448-3906](tel:+1772-448-3906), [204719273#](tel:+1772-448-3906) United States, Port St Lucie

[Find a local number](#)

Phone conference ID: 204 719 273#

For organizers: [Meeting options](#) | [Reset dial-in PIN](#)


---


---

Please Note: Florida has very broad public records laws. Most written communications to or from County officials regarding County business are public records available to the public and media upon request. It is the policy of St. Lucie County that all County records shall be open for personal inspection, examination and / or copying. Your e-mail communications will be subject to public disclosure unless an exemption applies to the communication. If you received this email in error, please notify the sender by reply e-mail and delete all materials from all computers.

## MEMORANDUM

TO: Mayor and City Council Members

VIA: Jesus Merejo, ICMA-CM, City Manager 

THRU: Teresa Lamar-Sarno, AICP, ICMA-CM, Assistant City Manager 

FROM: Mary Savage-Dunham, AICP, Director, Planning & Zoning MFSD

SUBJECT: County Development: Neill Farms Estates FLUMA

DATE: June 13, 2024

The purpose of this memorandum is to provide an update on the Neill Farms Estates Future Land Use Map Amendment (FLUMA) currently in process in St. Lucie County (SLC) and to identify staff concerns at a high level.

The Neill Farms FLUMA application was recently amended to add GL Homes as a co-applicant with GT Homes. An updated traffic analysis was submitted by Simmons and White dated May 6, 2024. The revised traffic analysis was reviewed by the City's traffic consultant, Kittelson & Associates, Inc. (KAI), and KAI review provided to the county and the applicant. The Planning and Zoning Department submitted a letter to the County on the proposed amendment for the June 20, 2024 Planning Commission meeting. Staff from the Planning and Zoning Department and the Public Works Department will be in attendance at the meeting to read the letter into the record, submit KAI's traffic review into the record, and answer any questions.

Neill Farms Estates is a request to change the Future Land Use (FLU) designation from AG-5 (Agricultural-5) to Mixed Use Development (MXD) requesting a maximum density of 3 units per acre. The proposed development will have a maximum of 1,263 residential dwelling units with a horizon year of 2045. The site is approximately 420.96 acres located on the west side of Range Line Road between SW Discovery Way and Tradition Parkway in St. Lucie County.

Staff's main concerns are that the project is moving forward before the City's comments and concerns about traffic impacts are addressed. The 2045 background volumes in the traffic analysis for city roads such as Discovery Way, Marshall Parkway, and N/S A appear to be inconsistent

with the level of development that is already approved for other projects in the area that will also utilize these roadways. The project is dependent upon construction of SW Discovery Way to Range Line Road for capacity and access. This is a City roadway that is not even under construction.

The applicant's traffic analysis shows that two roadway segments on Range Line Road and one roadway segment on Glades Cut Off Road are expected to operate below the Level of Service threshold requirements by 2045. Per the Simmons and White traffic study, the applicant will agree to make a proportionate share payment to mitigate the impact to the transportation network. At this time, the County has not made any plans for improvements to Range Line Road other than to identify that improvements will be needed in the future. Staff is concerned that the County is behind in addressing transportation impacts to its roadways. Staff is also concerned about the reliance on the County proportionate share program to address transportation impacts. The City is not a party to the County's proportionate share program and has no say in how or where the funds are used. There is no guarantee that the funds collected from the proportionate fair share program would be used to address impacts on city or adjacent county roadways.

Staff's letter and Kittelson and Associates, Inc. review memo for the June 6, 2024 Planning and Zoning Commission are attached for Council's review.

Enclosures





June 14, 2024

Benjamin Balcer, AICP, Director  
Planning & Development Services, St. Lucie County  
2300 Virginia Ave.  
Fort Pierce, FL 34982

Re: Neill Farm Estates- FLUMA- 2211-000019  
Future Land Use Map Amendment from AG-5 (Agricultural-5) to MXD (Mixed Use Development)

Dear Mr. Balcer:

The City is in receipt of the revised submittal for Neill Farm Estates which is a request to change the Future Land Use designation from AG-5 (Agricultural-5) to Mixed Use Development (MXD) requesting a maximum density of 3 units per acre, the proposed development will have a maximum of 1,263 residential dwelling units with a horizon year of 2045. The site is approximately 420.96 acres located on the west side of Range Line Road between SW Discovery Way and Tradition Parkway in St. Lucie County. This new submittal is due to changes in the project team and substantive changes to the overall project proposal. The City of Port St. Lucie previously provided comments on this project as part of the review process, but we note that the comment response letter from the applicant team to the County addressed to the City's Traffic Consultant did not address or respond to any of the comments from the City.

The City had our peer review traffic consultant Kittelson & Associates, Inc. (KAI) review the Traffic Impact Analysis (TIA) prepared by Simmons and White dated May 6, 2024, which replaces the traffic analysis previously conducted by MacKenzie Engineering and Planning, Inc. that is dated October 2023. Based upon a review of the proposal, as well as the team's understanding of the active projects on Range line Road and in the immediate area, the City has the following comments and concerns for your consideration.

1. The MXD FLU allows for a maximum of 15 units/acre, but this proposal includes sub area policies that limit the density to 1,263 units of age restricted single family units at 3 units/acre. These sub-area policies are not reflected in the applicant's traffic study. The City has concerns that the density could be changed in the future with a text amendment to the sub-area policy, quite possibly without the benefit of a revised TIA. The City requests

- that the subarea policy include a condition that requires a revised TIA and notice to the City as part of any text amendments in the future.
2. The 2045 background volumes in the traffic analysis for city roads such as Discovery Way, Marshall Parkway, and N/S A appear to be inconsistent with the level of development that is already approved for other projects in the area that will also utilize these roadways. This includes Oak Ridge Ranches, Tradition DRI, Riverland DRI, Wilson Groves DRI, and Southern Groves DRI as well as other developments proposed for this area of the county. If the background volumes are not accurate, then it is impossible to assess the impact of this project on the City of Port St. Lucie.
  3. The applicant's project traffic distribution analysis does not appear to assign any project traffic to I-95. This may affect the amount of project traffic on City roads, such as Tradition Parkway and Discovery Way.
  4. As identified in the applicant's traffic study, two roadway segments on Range Line Road and one roadway segment on Glades Cut Off Road are expected to operate below the Level of Service threshold requirements by 2045. As stated in the traffic study, the applicant will agree to make a proportionate share payment to mitigate the impact to the transportation network. The study does not identify nor is the City aware of any County studies, plans, or timeline for future improvements to Range Line Road to increase capacity and provide multi-modal access for pedestrians and bicyclists.
  5. Most of the County projects in this area are relying on City roadways for capacity and access. One of the proposed sub-area policies states that the County will not issue residential building permits for residential units for sale within the project until such time as S.W. Discovery Way is open for public use as a minimum two (2) lane roadway from its current terminus east of Range Line Road to Range Line Road. SW Discovery Way is part of the City's SW roadway network and is not currently constructed yet this project specifically indicates it will be using it.
  6. The City has concerns about the reliance on the County's proportionate share program to address traffic impacts since the City is not a party to the County's proportionate fair share program. There is no guarantee that the funds collected from the proportionate fair share program would be used to address impacts on city or adjacent county roadways.

For the issues stated above, it is critical that the potential impacts to the City's infrastructure are quantified and any mitigation for those impacts is identified and agreed upon before any affirmative action by St. Lucie County in order to protect the interests of the residents. The City does not yet have any assurance from the developer or the County that the City will not be left to bear the fiscal burden associated with increased infrastructure demands created by this project and other projects in the area.

Benjamin Balcer  
Page 3  
June 14, 2024

The City respectfully requests that the above referenced project does not move forward to the County Commission until City staff, County staff, and the applicant have agreed to a mitigation plan or a condition of approval that provides the City assurances that any potential offsite impacts to city roadways will be addressed. Given the number of large developments in this area of SLC, on the western boundary of the City, it may be beneficial for the county to prepare a thoroughfare plan that identifies the transportation improvements that are needed to serve the County's expanded urban service area west of Range Line Road including cross connections to avoid overburdening individual roadways and to provide more of a grid network.

The City appreciates the County's willingness to work with the City on the review of these projects. We look forward to further collaboration. We are asking that this letter along with the attached copy of Kittelson & Associates, Inc. peer review of the traffic analysis be added to public record as part of the Planning and Zoning Commission's review of the above referenced projects.

Sincerely,



Mary F. Savage Dunham, AICP, CFM  
Director-Planning & Zoning  
attachment

cc: Jesus Merejo, City Manager  
Teresa Lamar-Sarno, Assistant City Manager  
Richard Berrios, Interim City Attorney  
Elizabeth Hertz, Senior Deputy City Attorney  
Colt Schwerdt, P.E., Public Works Director & City Engineer  
Diana Spriggs, P.E. Assistant Director Public Works  
George Landry, St. Lucie County Administrator  
Mayte Santamaria, Deputy County Administrator II  
Patrick Dayan, P.E. St. Lucie County Public Works Director  
Kori Benton, SLC Planning & Development Services  
Thad Crowe, AICP, Senior Planner

MEMORANDUM

---

Date: June 7, 2024 Project #: 29311.003  
To: Clyde Cuffy, P.E.  
Regulatory Division Director  
City of Port St. Lucie Public Works Dept.  
121 SW Port St. Lucie Blvd, Building B  
Port St. Lucie, FL 34984  
From: Kok Wan Mah, P.E.  
Project: Neil Farms Estates FLU TIA  
Subject: Traffic Impact Study Technical Review

---

A Traffic Impact Analysis was conducted to support the Future Land Use Amendment for the proposed Neil Farms Estates project. The site is approximately 420.96 acres located on the west side of Range Line Road between SW Discovery Way and Tradition Parkway in St. Lucie County. Parcel IDs for the property include the following:

- 4213-131-0025-000-0
- 4213-313-0001-000-4

The petition requests to change the Future Land Use designation from AG-5 (Agricultural-5) to Mixed Use Development (MXD) requesting a maximum density of 3 units per acre, the proposed development will have a maximum of 1,263 residential dwelling units with a horizon year of 2045.

Kittelison & Associates, Inc. (KAI) has reviewed the Traffic Impact Analysis prepared by Simmons and White dated May 6, 2024, replacing the traffic analysis previous conducted by MacKenzie Engineering and Planning that is dated October 2023. It should be noted that comments from the City were not included in the comment/response letter. Our review comments are provided below:

1. The traffic analysis conducted by Simmons and White notes that the FLU Amendment for the property has changed from RU to MXD. The MXD land use offers that greatest flexibility of any of the County's FLU designations and where "innovative land use concepts are encouraged". Furthermore, as stated in the St. Lucie County Comprehensive Plan, "Application of this district should be with prudence, and should be only to those areas where traditional land use classifications do not afford the desired flexibility and community input in land use planning necessary to address local concerns." As required for any Future Land Use Amendment, a comparison between the current and proposed future land use designations shall be conducted between the highest and best use for each designation. The land use and intensity used for the FLU traffic analysis is 1,263 units of age-restricted single family (3 DU/ac). Sub-area policies are proposed that would limit the development to 3 DU/ac, however, the MXD FLU allows for a maximum of 15 DU/ac, which would result in an intensity of 6,314 dwelling units using a land use

of single family (ITE LUC 210) to produce a maximum of 45,729 daily trip ends, 3,239 AM peak-hour trip ends, and 4,893 PM peak-hour trip ends. This is in comparison to the 5,116 daily, 267 AM, and 321 PM trip ends shown in the traffic analysis. If there is a PUD rezoning traffic study to accompany the FLU traffic analysis to show that the development will be capped to the land use and intensities shown in the FLU, that should be submitted and reviewed concurrently with the FLU traffic analysis. The subarea policies provide for similar restrictions for FLU Amendments, however, they can also be changed through future text amendments. A condition should be included in the subarea policy to inform the City if any text amendments are proposed. The traffic analysis should also be revised to show the highest and best use under MXD without the subarea policy. Text in the traffic study can be included, stating that a subarea policy will limit the land use and intensity of the development to what is shown in table 3.

2. Project traffic distribution does not appear to assign any project traffic to I-95. This may affect the amount of project traffic on City roads, such as Tradition Parkway and Discovery Way.
3. Discovery Way is shown to carry 26% to 36% of project traffic, but most of that traffic appears to drop off at Community Blvd and the attenuation of project traffic can not be traced. Please verify.
4. The 2045 background volumes used in the traffic analysis for city roads such as Discovery Way, Marshall Parkway, and N/S A are inconsistent with the level of development for approved projects (Oak Ridge Ranches, Tradition, Riverland, Wilson Groves, Southern Groves, etc), traffic analyses that were done for the mentioned approved developments, and improvement needs for those facilities. For example, Discovery Way from Rangeline Road to N/S A is planned to be 4 lanes based on the traffic analysis and improvement needs for Riverland. The 2045 analysis for Neill Farms shows a peak-hour peak-direction background volume of 266 and 316 with Neil Farms traffic.
5. Advisory to County: With multiple large developments expanding to the west, arterials such as Glades Cut-Off Road and Rangeline Road become increasingly important in providing access and routing for not only vehicular traffic, but multimodal traffic as well. It is recognized that both of these facilities were originally intended for agriculture and freight uses. However, with approval of developments with large residential components, it becomes increasingly important to plan for the means to provide adequate facilities to promote and encourage multimodal travel between each side of Rangeline Road and Glades Cut-Off Road. Sidewalks, trails, and lighting should not stop at these roadways at the risk of creating barriers to access for pedestrians and bicyclists.

In summary the requirements for a traffic analysis to support a Future Land use Amendment are not as stringent as what would be needed to satisfy concurrency and site plan approval. However, the objective is to demonstrate that a change in Future Land Use is consistent with the local government's Comprehensive Plan. Consequently, the analysis provided in the traffic study should compare the trip generation between the highest and best use for the current and proposed Future Land Use designation. If the comparison shows an increase, then those trips should be distributed within the study area for a near-term analysis (usually 5 years) using the existing plus committed roadway network, and the horizon year identified in the Comprehensive Plan (in this case 2045) using the LRTP

network. Any deficiencies above and beyond the capacity in those networks should be identified. What was included in the traffic study does not follow this process. The highest and best use for MXD was not used.

We appreciate the opportunity to provide these comments to the City of Port St. Lucie. If you have any questions or concerns, please contact me at [kmah@kittelson.com](mailto:kmah@kittelson.com) or 407.373.1127.



July 25, 2024

St. Lucie County Board of County Commissioners  
2300 Virginia Ave.  
Fort Pierce, FL 34982

**Re: St. Lucie County Future Land Use Map Amendment (FLUMA) 2211-000019 - Neill Farms Estates**

Dear Chair Townsend, Vice-Chair Dzadozsky and County Commissioners:

The City of Port St. Lucie (City) has been reviewing the submittals for the Neill Farm Estates Comprehensive Plan amendment that is scheduled for a transmittal hearing at the August 6, 2024, St. Lucie County Board of County Commissioners meeting. As stated in prior letters to the County, the City is concerned that the FLUMA is moving forward in the County before the City's concerns have been mitigated.

The City's immediate concerns relate to the disconnect between the FLUMA and the County's existing long range transportation plan. The traffic study associated with the FLUMA shows segments of County roads failing in 2045. Specifically, the applicant's traffic study identifies two roadway segments on Range Line Road and one roadway segment on Glades Cut Off Road that are expected to operate below the Level of Service threshold requirements by 2045. Table 9 from the TIA is attached for your use and information. There are no proposed improvements to Range Line Road in the County's existing long range transportation plan other than a PD&E study in 2031.

Policy 2.1.2.2 of the County's Transportation Element states that the County will review all proposed developments for consistency with the County's comprehensive plan and require coordination of traffic mobility plans and multi-modal transportation improvements with land use, right-of-way, and infrastructure plans before development approval.

Objective 2.1.1 of the County's Comprehensive Plan states that the county's transportation system shall be reviewed in coordination with any requested changes to the County's Future Land Use Element. A report on the impacts to the system brought about by any land use change shall be prepared and presented to the Board of County Commissioners as part of the review of the land use change.

Currently, there is not a concurrent modification to the long-range transportation plan to support the proposed FLUMA. Instead, the FLUMA relies on City roadway improvements to provide the capacity and the connectivity needed to support the project.<sup>1</sup>

While the City is supportive and appreciative of the County's efforts to limit impacts by requiring subarea policies within the proposed FLUMA that restrict the residential development density to 1,263 units of age restricted single family units (or 3 units/per acre), the City respectfully requests that the policies also contain a provision that requires a revised traffic impact analysis and coordination with the City on the review of future traffic studies in the event there is modification to the density cap or land use.

Lastly, in terms of future applications regarding this project, the City has concerns about the proposed reliance on the County's proportionate share program to address traffic impacts. First, all the roadways necessary to support this project long term are not currently identified in the County's long range transportation plan and CIP. These improvements are not planned to be available to coincide with the impacts of the development. Second, even if all of this information was currently contained in the County's regulatory documentation, the City is not a party to the County's proportionate fair share program. It is not clear how impacts to City roadways will be addressed under the County's proportionate fair share program. With the numerous projects pending west of Range Line Road, this is the opportunity for the County to require all developers to provide for a future north-south roadway at the westernmost boundary of their projects and the City respectfully suggests that this should be one of the conditions of approval for these projects. The expansion of a grid network of roadways for development going west will aid in the concerns of overloading any one roadway in the future.

The City looks forward to discussing how to bridge these gaps with the County consistent with Policy 8.1.1.3 of the County's Intergovernmental Coordination Element of its Comprehensive Plan. The City appreciates the County's willingness to work with the City on the review of projects that have interjurisdictional impacts and we look forward to further collaboration. Given the concerns the City has with this application, the City respectfully requests the County postpone the public hearing on the transmittal of this amendment to the Florida Department of Commerce until City staff, County staff, and the applicant have agreed to a mitigation plan or a condition of approval that addresses the City's concerns about impacts to City roads, needed County road

---

<sup>1</sup> For example, one of the proposed sub-area policies for the FLUMA indicates that the County will not issue residential building permits for the project until such time as S.W. Discovery Way is open for public use as a minimum two (2) lane roadway from its current terminus east of Range Line Road to Range Line Road. SW Discovery Way is part of the City's SW roadway network and is not currently constructed yet. This project specifically indicates it will be using it.



SLC BOCC  
Page 3  
July 22, 2024

improvements, and the need for the sub-area policies to require new traffic studies with any proposed changes.

Sincerely,

**Mary Savage-Dunham**

Mary F. Savage-Dunham, AICP, CFM  
Director-Planning & Zoning

**Attachment**

cc: Jesus Merejo, City Manager  
Teresa Lamar-Sarno, Assistant City Manager  
Richard Berrios, City Attorney  
Elizabeth Hertz, Senior Deputy City Attorney  
Terrell Arline, Esquire  
Colt Schwerdt, P.E., Public Works Director & City Engineer  
Diana Spriggs, P.E. Assistant Director Public Works  
George Landry, St. Lucie County Administrator  
Mayte Santamaria, Deputy County Administrator II  
Benjamin Balcer, AICP, St. Lucie County Planning and Development Services Director  
Patrick Dayan, P.E. St. Lucie County Public Works Director  
Kori Benton, SLC Planning & Development Services  
Peter Buchwald, SLC TPO  
Larry Hymowitz, FDOT  
James D. Stansbury, Chief, Bureau of Community Planning and Growth, FDEO

**NEILL FARMS FLUA TRAFFIC STUDY**

05/06/2024

**TABLE 9  
2045 TOTAL TRAFFIC ANALYSIS**

ROADWAY	FROM	TO	PROG. LANES	CAPACITY	PEAK DIR.	V/C RATIO	MEET LOS?	MITIGATION
BECKER RD	RANGLINE RD	N/S A	4-LANES	1,850	530	0.29	YES	
BECKER RD	N/S A	N/S B	4-LANES	1,850	630	0.34	YES	
BECKER RD	N/S B	COMMUNITY BLVD	6-LANES	2,730	1,266	0.46	YES	
N/S A	BECKER RD	PAAR DR	4-LANES	1,850	166	0.09	YES	
N/S A	PAAR DR	MARSHALL PKWY	4-LANES	1,850	419	0.23	YES	
N/S A	MARSHALL PKWY	DISCOVERY WAY	4-LANES	1,850	603	0.33	YES	
N/S A	DISCOVERY WAY	GATLIN BLVD	4-LANES	1,850	777	0.42	YES	
GATLIN BLVD/ TRADITION PKWY	RANGLINE RD	N/S A	4-LANES	1,850	786	0.42	YES	
GATLIN BLVD/ TRADITION PKWY	N/S A	COMMUNITY BLVD	4-LANES	1,850	1,380	0.75	YES	
CROSSTOWN PKWY	RANGELINE RD	N/S A	4-LANES	1,850	1,589	0.86	YES	
CROSSTOWN PKWY	N/S A	VILLAGE PKWY	4-LANES	1,850	1,671	0.90	YES	
RANGELINE RD	MARTIN HWY	BECKER RD	2-LANES	1,080	943	0.87	YES	
RANGELINE RD	BECKER RD	PAAR DR	2-LANES	1,080	948	0.88	YES	
RANGELINE RD	PAAR DR	MARSHALL PKWY	2-LANES	1,080	855	0.79	YES	
RANGELINE RD	MARSHALL PKWY	DISCOVERY WAY	2-LANES	1,080	993	0.92	YES	
RANGELINE RD	DISCOVERY WAY	TRADITION PKWY	2-LANES	1,080	1,106	1.02	NO	PROP SHARE
RANGELINE RD	TRADITION PKWY	CROSSTOWN PKWY	2-LANES	1,080	1,664	1.54	NO	PROP SHARE
RANGELINE RD	CROSSTOWN PKWY	GLADES CUT-OFF RD	2-LANES	1,070	2,871	2.68	NO	PROP SHARE
<b>GLADES CUT-OFF RD</b>	<b>RANGELINE RD</b>	<b>RESERVE BLVD</b>	<b>4-LANES</b>	<b>1,850</b>	<b>1,996</b>	<b>1.08</b>	<b>NO</b>	<b>PROP SHARE</b>
DISCOVERY WAY	RANGELINE RD	N/S A	4-LANES	1,850	316	0.17	YES	
DISCOVERY WAY	N/S A	N/S B	4-LANES	1,850	448	0.24	YES	
DISCOVERY WAY	N/S B	COMMUNITY BLVD	4-LANES	1,850	992	0.54	YES	
MARSHALL PKWY	RANGELINE RD	N/S A	2-LANES	1,110	320	0.29	YES	
MARSHALL PKWY	N/S A	N/S B	4-LANES	1,850	743	0.40	YES	
MARSHALL PKWY	N/S B	COMMUNITY BLVD	4-LANES	1,850	778	0.42	YES	

January 10, 2024

Benjamin Balcer, AICP, Director  
Planning & Development Services, St. Lucie County  
2300 Virginia Ave.  
Fort Pierce, FL 34982

Re: Rainbow Groves FLUMA SLC 23-1DRI

Dear Mr. Balcer:

The City of Port St. Lucie is in receipt of the latest traffic analysis that was submitted via email by Dylan O'Berry, P.E., Giangrande Engineering & Planning, after the close of business on January 4, 2024. The traffic analysis was reviewed by City staff and the City's 3<sup>rd</sup> Party Traffic Consultant, Kok Wan Mah, Kittelson & Associates, Inc. The purpose of this letter is to advise you that, based upon our consideration and peer review of the Traffic Impact Analysis (TIA) prepared for the Rainbow Groves Future Land Use (FLU) Amendment, the City does not accept the revised January 2024 TIA, and does not support the scheduling of the adoption hearing for the proposed comprehensive plan amendment before the Board of County Commissioners for February 6, 2024. It's the collective opinion of City staff and the City's 3<sup>rd</sup> Party Traffic Consultant that the traffic analysis is incomplete, contains inconsistencies, and does not provide sufficient information for the City to quantify potential impacts to City roadways.

As noted, the City had the latest copy of the traffic analysis peer reviewed by Kittelson and Associates, Inc. While many of the original technical comments have been satisfied there remain several issues that are outstanding and of significant concern to the City. Our concerns include, but are not limited to the following items: (1) the City does not yet agree with the distribution of the project traffic, (2) we question the model output in the Appendix and note that the TIA is internally inconsistent because the material in the Appendix is different than the project distribution map, and (3) we have questions regarding the background growth and why the analysis shows volume decreases between the 2028 and 2045 analyses for multiple roadway segments.

The City of Port St. Lucie has a planned and partially constructed roadway network in the area immediately east of the subject property between Range Line Road and Interstate 95. This includes four north-south arterial roadways and seven east-west arterial roadways. Two of the east-west roadways, Crosstown Parkway and Becker Road, are currently under construction and when complete, will provide direct access to Interstate 95 from Range Line Road and Becker Road will provide direct access to the Florida Turnpike from Range Line Road. Yet, the project's distribution of traffic appears to be designed to show limited impacts to City roadways even though the City's

Benjamin Balcer  
Page 2  
January 10 ,2024

roadways provide the most direct access to Interstate 95 and the Florida Turnpike. The City is also questioning the model used for this study and why the Neill Farms model was used because Neill Farms is a residential development and Rainbow Groves is an industrial and commercial development, which would result in different traffic distribution patterns.

The roadway network in the City's southwest annexation area between Range Line Road and Interstate 95 was planned and designed to accommodate the buildout of approved development of regional impact within the City's southwest area. The City negotiated and obtained road right-of-way conveyance and construction commitments from developers in the southwest annexation area based on the entitlements in the approved developments of regional impact (DRIs) for that area of the City. This means that the city has commitments from certain developers for certain roadway improvements based on anticipated development within the City of Port St. Lucie. These roadway commitments were configured based on the known developments at the time. This network was not planned nor designed to accommodate significant development in St. Lucie County west of Range Line Road. Therefore, these existing roadway commitments in the city may not be adequate to accommodate development in the County along the City's western boundary line. If additional capacity is needed on any of these roadways beyond what is required by the DRIs or prior to the DRI commitments being triggered, the City would be the entity responsible for funding and constructing any additional improvements, including the associated drainage improvements or further right-of-way acquisitions. Additional development in the county may necessitate additional infrastructure improvements in the city. For these reasons, it is essential that impacts to the City's roadways are properly quantified, and mitigation guaranteed in a manner acceptable to the City prior to final action by the Board of County Commissioners for this the project.

A copy of the City's 3<sup>rd</sup> Party Traffic Consultant's comment letter is attached. Thank you in advance for your assistance with this important matter. City staff is available for further discussion and happy to assist the County in the review of this project. If you have any questions please do not hesitate to contact me.

Sincerely,



Mary F. Savage-Dunham, AICP, CFM  
Director-Planning & Zoning  
attachment

cc: Jesus Merejo, City Manager  
Teresa Lamar-Sarno, Assistant City Manager  
Richard Berrios, Interim City Attorney

Benjamin Balcer  
Page 3  
January 10 ,2024

Elizabeth Hertz, Senior Deputy City Attorney  
Terrell Arline, Attorney at Law  
Colt Schwerdt, Interim Public Works Director & City Engineer  
Diana Spriggs, P.E. Regulatory Division Director-Public Works  
George Landry, St. Lucie County Administrator  
Patrick Dayan, P.E. St. Lucie County Public Works Director  
Kori Benton, SLC Planning & Development Services  
Kok Wah Mah, Kittleson Associates  
Peter Buchwald, St Lucie County TPO  
Larry Hymowitz, FDOT  
Leo Giangrande, GEP  
Dylan O'Berry, GEP

MEMORANDUM

---

Date: January 7, 2024 Project #: 29311.001  
To: Diana Spriggs, P.E.  
Regulatory Division Director  
City of Port St. Lucie Public Works Dept.  
121 SW Port St. Lucie Blvd, Building B  
Port St. Lucie, FL 34984

From: Kok Wan Mah, P.E.  
Project: Rainbow Groves FLU TIA  
Subject: FLU TIA Technical Review

---

A Future Land Use Traffic Impact Analysis study was revised and resubmitted to support the Future Land Use Amendment for the proposed Rainbow Groves project. The site is approximately 245.27 acres located on the west side of Range Line Road and east of McCarty Ranch Preserve, approximately 1 mile south of Glades Cut-Off Road in St. Lucie County. Parcel IDs for the property include the following:

- 4212-111-0001-000-1 +/- 205.25 acres
- 4212-113-0001-000-7 +/- 15.02 acres
- 4212-123-0001-000-8 +/- 25.00 acres

The petition requests to change the Future Land Use designation from AG-5 (Agricultural-5) to MXD (Mixed Use Development) with associated Specific Use Areas for Heavy Industrial, Light Industrial, and Light Industrial/Commercial Land Uses, to be developed pursuant to a Planned Non-Residential Development (PNRD). A breakdown by use is provided in the TIA and shown below:

- Heavy Industrial (150.67 ac.; 3,281.6 KSF)
- Light industrial (48.57 ac.; 1,558.8 KSF)
- Light Industrial / General Commercial (46.00 ac.; 500.9 KSF)

The proposed development will potentially generate up to 41,717 daily trip ends, 5,482 AM peak-hour trips (3,941 in and 1,541 out), and 5,921 PM peak-hour trips (2,351 in and 3,570 out).

Kittelison & Associates, Inc. (KAI) has reviewed the revised FLU TIA prepared by Giangrande Engineering & Planning that is dated January 2024. One major change in the revised traffic study is the removal of the intersection analysis and cost estimates. As stated by GEP, *“since these items are not required per Florida Statutes Sec 163.3177 to be included as part of the FLU amendment process.”* The original review comments are as follows with Applicant response in *italics*, and sufficiency comment in **bold**. The original comments are highlighted to indicate **sufficient response** by the Applicant, **minor comments** that are not likely to change the results and conclusions of the study, and **major comments** that need to be addressed prior to any recommendation for approval. New comments based on changes made to the study are included after the original comments and responses.

1. General – If intersection analyses are required for this study, please include figures showing existing, future background (with any vested trips), and future total turning movement volumes. Also include tables that summarize the measures of effectiveness for overall and each approach.  
*RESPONSE: The Rainbow Groves Future Land Use (FLU) Application to Saint Lucie County is only for a Land Use Amendment therefore the intersection study will be removed from the Revised Traffic Impact Analysis.*  
**Sufficiency Comment:** The revised study does not include intersection analyses. Intersection analyses are not required for Future Land Use Amendment applications. A future traffic study will be expected as part of the concurrency and site plan approval process that will include intersection analyses. This has been addressed sufficiently. No further comment.
2. Executive Summary – Is this study conducted to support FLU or concurrency? If FLU amendment is being sought, the cost estimates provided are premature as the detailed improvements needs would be identified during concurrency.  
*RESPONSE: The Rainbow Groves Future Land Use (FLU) Application to Saint Lucie County is only for a Land Use Amendment therefore the cost estimates will be removed from the Revised Traffic Impact Analysis.*  
**Sufficiency Comment:** The revised study does not include cost analyses, which are not required for Future Land Use Amendment applications. A future traffic study will be expected as part of the concurrency and site plan approval process that will include prop share and cost estimates. However, the host jurisdiction may still request the Applicant to provide for a means to address impacts which are inconsistent with the Comprehensive Plan. No further comment.
3. Page 2 – The GFA using 50% coverage was verified to be consistent with Policy 1.1.1.1 of the St. Lucie County Comprehensive Plan Future Land Use Element.  
*RESPONSE: Acknowledged. Thank you.*  
**Sufficiency Comment:** No further comment.
4. Page 2 – The study notes that the most intense ITE Land Use Codes were utilized for the analysis. This is true if the land use type is proposed for each area, but MXD does not limit the land uses to the ones shown unless this is being submitted concurrently with a PUD zoning or with specific policy changes to limit the land uses permitted.  
*RESPONSE: The project has an approved transmittal which specifies the land uses as we have presented in the report. The Zoning MXD Specific Use Area that was approved by the St Lucie County Board of County Commissioner BOCC Development Review Committee DRC on 6/9/23. The land use shown is the most intense approved land use. Please refer to the attached St Lucie County Transmittal for reference.*  
**Sufficiency Comment:** The transmittal included in the Appendix of the revised study is consistent with the response to this comment and therefore, the traffic study provides an analysis of the highest and best use. No further comment.
5. Table 1 – The trip generation used for each of the land uses is conservatively high since it is based on the AM and PM peak-hour of the use rather than the AM and PM peak-hour of the adjacent road as is conventionally done with most TIAs. Therefore, the AM trips are overestimated by approximately 44% and the PM trips are overestimated by approximately 13%. This results in

more impacts than may be expected from the development.

*RESPONSE: The ITE Trip Generation Codes are updated to use the AM and PM Peak Hour of Adjacent Street. The revised trip gen numbers are presented in the revised TIA report.*

**Sufficiency Comment:** Table 2 in the revised study has been updated to reflect the trip generation of the site for the peak-hour of the adjacent street traffic, which follows the conventional analysis period. The trip generation includes 55,355 net daily trips, 3,822 net AM peak-hour trips (2,898 in and 924 out), and 6,476 net PM peak-hour trips (2,455 in and 4,021 out). Trip generation was verified. No further comment.

6. Page 3 – The study only considers the worst-case scenario for analysis. Worst case should consider both inbound and outbound since the peak-direction of the project traffic may not coincide with the peak-direction of the traffic on the roadway segment. It is requested that the PM peak-hour for inbound and outbound be analyzed to account for impacts that may occur for the peak-direction of the background volume, especially given that the project trips will generally be heading in the opposite direction of the peak-hour peak-direction of background traffic as stated in the study on page 4.

*RESPONSE: Acknowledged. The PM inbound and outbound will be analyzed in the revised TIA.*

**Sufficiency Comment:** Both AM and PM analyses were included with the revised study. Please see new comment #2.

7. Page 3 – For background growth, the study states that “The historical growth rates for the 10-year are divided by 2 in order to compensate for discrepancies in the data such as gaps, spikes and dips in traffic trends over the longer period of time.” Please elaborate on dividing the growth by 2. Does this mean that if historical growth rate shows 4%, the analysis assumed 2% for the 10-year analysis? When using more data points (10-year vs 5-year trend), the “gaps, spikes, and dips in traffic trends” will play less of a factor. Dividing the growth rate by 2 is not a conventional means for accounting for future background growth. This is inconsistent with the methodology and should have been discussed during the methodology phase.

*RESPONSE: Acknowledged. Historical growth rates for the horizon 20-year will reference modeling output data in the revised TIA. The 5-year analysis will continue to reference the St Lucie Traffic Data Online. The “interim” 10-year analysis not being required as part of the FLU and will be removed from the revised TIA.*

**Sufficiency Comment:** Background growth has been revised to use historical growth rates for the 2028 analysis (with a minimum of 2.5% annual growth) and model growth rates for the 2045 analysis. In general, this is an acceptable practice. However, many of the analysis segments show a lower background volume in 2045 compared to 2028. As rapid growth continues in this area, the decrease in background traffic doesn’t make sense. For example, the 2028 segment analysis shows a background volume of 2,450 for Crosstown Parkway from California Blvd to I-95. In 2045, the background volume is 2,294. Becker Road volumes decrease from 2,489 (2028) to 2,212 (2045). These are two segments where the 2045 v/c is over 0.80. Therefore, any modest growth from the 2028 volumes may show deficiencies. Please provide an explanation for the volume decreases in the 2045 future analysis. If additional network is



**provided which provides relief to existing facilities, then a corridor evaluation should be provided to show the overall growth in each corridor.**

8. Page 4 – Please provide additional explanation of how the truck trips were derived. Include any supporting pages in the Appendix.

*RESPONSE: The truck trips derive from the ITE Trip Gen. Background heavy truck percentages were obtained from the County Traffic Management Online Data. The ADT daily trips are distributed onto the County designated freight route. The truck trips will be checked and updated in the revised TIA.*

**Sufficiency Comment: Truck trips have been revised. No further comment.**

9. Page 5 – If intersection analyses are required as part of the FLU amendment process, then please include Synchro/HCS reports for all analysis scenarios to verify the improvement needs.

*RESPONSE: The Rainbow Groves Future Land Use (FLU) Application to Saint Lucie County is only for a Land Use Amendment therefore the intersection study will be removed from the Revised Traffic Impact Analysis.*

**Sufficiency Comment: The revised study does not include intersection analyses. Intersection analyses are not required for Future Land Use Amendment applications. A future traffic study will be expected as part of the concurrency and site plan approval process that will include intersection analyses. This has been addressed sufficiently. No further comment.**

10. The intersections analyzed are not consistent with the list of intersections in the methodology. Please explain.

*RESPONSE: Acknowledged. Since it is not required for FLU, the intersection analysis will be removed from the revised TIA.*

**Sufficiency Comment: The revised study does not include intersection analyses. Intersection analyses are not required for Future Land Use Amendment applications. A future traffic study will be expected as part of the concurrency and site plan approval process that will include intersection analyses. This has been addressed sufficiently. No further comment.**

11. Page 5 - Intersection improvements include statements such as “6-lane signalized intersection”. Please clarify whether this means that both roads require a six lane approach.

*RESPONSE: Acknowledged. Since it is not required for FLU, the intersection analysis will be removed from the revised TIA.*

**Sufficiency Comment: The revised study does not include intersection analyses. Intersection analyses are not required for Future Land Use Amendment applications. A future traffic study will be expected as part of the concurrency and site plan approval process that will include intersection analyses. This has been addressed sufficiently. No further comment.**

12. Page 6 - The cost estimates for intersections do not appear to include any geometric changes to the intersection. Please confirm.

*RESPONSE: The Rainbow Groves Future Land Use (FLU) Application to Saint Lucie County is only for a Land Use Amendment therefore the cost estimates will be removed from the Revised Traffic Impact Analysis.*

**Sufficiency Comment: The revised study does not include cost analyses, which are not required for Future Land Use Amendment applications. A future traffic study will be expected as part of**

**the concurrency and site plan approval process that will include prop share and cost estimates. However, the host jurisdiction may still request the Applicant to provide for a means to address impacts which are inconsistent with the Comprehensive Plan. No further comment.**

13. Page 6 – The Conclusions section should be expanded to provide a narrative of the conclusions for each of the analysis scenarios. Identify the facilities that are deficient due to background vs with project.

*RESPONSE: Acknowledged. The conclusion will be updated to include the 5-year and 20-year results and list the deficiencies due to background as well as due to project results as requested with the revised TIA.*

**Sufficiency Comment:** The Conclusion section has been updated as requested. However, the first sentence in the conclusions reads, *“Based on this traffic analysis, the proposed development is not anticipated to have detrimental adverse impacts to the surrounding roadway network based on build-out conditions with future committed improvements.”* This is inaccurate since further down, the conclusions list all of the roadway segments which are adversely impacted by the project. This statement should be corrected. Moreover, while the report does include a statement to address the 20-year developer-funded improvements needed, the County should consider including those impacted segments within the 5-year analysis that result in adverse conditions due to the project.

14. Page 7 – The study includes a statement about Proportionate Fair Share, but it’s confusing if the study is conducted to support FLU amendment or for concurrency. This should be made clear.

*RESPONSE: Acknowledged. The proportionate fair share is not required as part of the FLU amendment and will be removed from the revised TIA.*

**Sufficiency Comment:** The revised study does not include cost analyses, which are not required for Future Land Use Amendment applications. A future traffic study will be expected as part of the concurrency and site plan approval process that will include prop share and cost estimates. However, the host jurisdiction may still request the Applicant to provide for a means to address impacts which are inconsistent with the Comprehensive Plan. No further comment.

15. Project distribution – The distribution used in the TIA is inconsistent with the distribution in the methodology.

*RESPONSE: Distribution provided will comply with the TPO Guidelines 2-mile radius or 5% significant impact. These results will be updated based upon the model results for the horizon 20-year in the revised TIA.*

**Sufficiency Comment:** The project distribution cannot be verified. The Appendix of the study includes a TCRPM output, however, it is for a different project (Neil Farms Estates), which is a proposed residential development located north of Rainbow Groves. The difference in socioeconomic data would result in different distribution characteristics. Based on conversations with the Applicant team, it was this reviewer’s understanding that a model was going to be run for Rainbow Groves and used for this revised analysis. This does not appear to be the case. Moreover, the distribution that was included in the Appendix does not match the distribution shown and used in the analysis. Please provide the model output conducted for Rainbow Groves and utilize the output distribution for the segment analysis.

16. The following issues need to be addressed in the HCS Intersection Analyses –

- a. All-red times used are 0.0.
- b. Please provide source of the timings and phase splits.
- c. PHF used is 1.00.
- d. Some movements show permissive phasing for dual left turns.
- e. Please state how the lane group volumes were developed. They appear to be estimates even though there are traffic counts taken at one or more of the intersections.
- f. Please include truck percentages used for each lane group.

*RESPONSE: The Rainbow Groves Future Land Use (FLU) Application to Saint Lucie County is only for a Land Use Amendment therefore the intersection analysis will be redacted from the Revised Traffic Impact Analysis.*

**Sufficiency Comment:** The revised study does not include intersection analyses. Intersection analyses are not required for Future Land Use Amendment applications. A future traffic study will be expected as part of the concurrency and site plan approval process that will include intersection analyses. This has been addressed sufficiently. No further comment.

New Comments

1. **Comment:** All tables and figures should be labeled to make it easier to reference. The tables and figures on pages 7 through 14 do not include reference numbers.
2. **Comment:** The tables on pages 8, 10, 12, and 14 all assume that the project traffic travels in the same direction of the background peak-hour peak-direction. However, this only affects two segments in the 2028 analysis and one segment in the 2045 analysis. The impact of this is that those segments have been identified as having deficiencies. When looking at the correct combination of project inbound/outbound coinciding with the peak-direction of background volumes, the deficiencies may or may not exist. Additionally, using the methodologies included in the revised traffic studies, the Applicant is identifying the worse of the two conditions for each analysis period. As long as the Applicant understands this and is agreement that the higher of the two total volumes (project+background) is used to determine any mitigation, the review agencies should not have issue with this. It is not the responsibility of the review agencies to determine which of each of the four scenarios provided is the correct volume to use for each segment.
3. **Comment:** In the “Distribution & Assignment” section of the report states that the study area includes either a 2-mile radius or 5% significance impact. The roadway segment tables do not appear to include all segments where project significance is 5% or greater. Becker Road shows a significance of 14.1% (2028) to Savona Blvd, but does not include any segments further east. Similarly, Crosstown Parkway shows a significance of 19% (2045), but does not evaluate any segments further east. This would be more concerning for segments that are identified as deficient at the end of the study area, but do not include any segments beyond. Please include all segments where project traffic is significant or provide support for not including these segments.

Although significant progress has been made to the revised TIA dated January 2024, there are several items which still need to be addressed. The most significant of these are highlighted in red above. These comments should be discussed with City staff and if acceptable, transmitted to the County at the earliest opportunity for County consideration. Although the Applicant has requested that the application be placed on the February 6<sup>th</sup> BoCC agenda, it is strongly recommended that these comments be addressed sufficiently, and all review agencies (St. Lucie County, Port St. Lucie, FDOT, SLTPO) be granted sufficient time to provide their review and recommendation before any staff report be entered into the agenda packet with any recommendation for approval.

We appreciate the opportunity to provide these comments to the City of Port St. Lucie. If you have any questions or concerns, please contact me at [kmah@kittelson.com](mailto:kmah@kittelson.com) or 407.373.1127.



July 25, 2024

St. Lucie County Board of County Commissioners  
2300 Virginia Ave.  
Fort Pierce, FL 34982

**Re: St. Lucie County Future Land Use Map Amendment (FLUMA) 2303-000022 - Palermo Estates**

Dear Chair Townsend, Vice-Chair Dzadoovsky and County Commissioners:

The City of Port St. Lucie (City) has been reviewing the submittals for the Palermo Estates Comprehensive Plan amendment that is scheduled for a transmittal hearing at the August 6, 2024, St. Lucie County Board of County Commissioners meeting. As stated in prior letters to the County, the City is concerned that the FLUMA is moving forward in the County before the City's concerns have been mitigated.

The City's immediate concerns relate to the disconnect between the FLUMA and the County's existing long range transportation plan. The traffic study associated with the FLUMA shows segments of County roads failing in 2045. Specifically, the applicant's traffic study identifies two roadway segments on Range Line Road and one roadway segment on Glades Cut Off Road that are expected to operate below the Level of Service threshold requirements by 2045 as identified in Table 4 of the traffic study. Furthermore, Table 10 identifies that Range Line Road will be four (4) laned between Becker Road and Crosstown Parkway by 2045. There are no proposed or programmed improvements to Range Line Road in the County's existing long range transportation plan other than a PD&E study in 2031 to indicate Range Line Road will be widened beyond the current two lanes by 2045. The traffic study should be revised to accurately reflect the anticipated roadway network in 2045 and not assume a road improvement that is not identified in any capital improvement program, long range transportation plan, or obligated by a developer. Table 10 of the TIA is attached for your use. It shows the roadway deficiencies that are not being addressed and it lists Range Line Road from Crosstown to Becker Road as a four (4) lane roadway by 2045.

Policy 2.1.2.2 of the County's Transportation Element states that the County will review all proposed developments for consistency with the County's comprehensive plan and require coordination of traffic mobility plans and multi-modal transportation improvements with land use, right-of-way, and infrastructure plans before development approval.

Objective 2.1.1 of the County's Comprehensive Plan states that the county's transportation system shall be reviewed in coordination with any requested changes to the County's Future Land Use Element. A report on the impacts to the system brought about by any land use change shall be prepared and presented to the Board of County Commissioners as part of the review of the land use change.

Currently, there is not a concurrent modification to the long-range transportation plan to support the proposed FLUMA. Instead, the FLUMA relies on City roadway improvements to provide the capacity and the connectivity needed to support the project.<sup>1</sup>

With the numerous adjacent projects pending west of Range Line Road, the City respectfully suggests that this is the opportunity for the County to require all developers to provide right of way for a future north-south roadway at the westernmost boundary of their projects and the City respectfully suggests that this should be one of the conditions of approval for these projects. The expansion of a grid network of roadways for development going west will aid in the concerns of overloading any one roadway in the future. This would provide for a north south road to the west of Range Line Road.

The City has concerns about the proposed reliance on the County's proportionate share program to address traffic impacts. All of the roadways necessary to support this project long term are not currently identified in the County's long range transportation plan and CIP. These improvements are not planned to be available to coincide with the impacts of the development. Even if all of this information was currently contained in the County's regulatory documentation, the City is not a party to the County's proportionate fair share program. It is not clear how impacts to City roadways will be addressed under the County's proportionate fair share program.

The City looks forward to discussing how to bridge these gaps with the County consistent with Policy 8.1.1.3 of the County's Intergovernmental Coordination Element of its Comprehensive Plan. The City appreciates the County's willingness to work with the City on the review of projects that have interjurisdictional impacts and we look forward to further collaboration. Given the concerns the City has with this application, the City respectfully requests the County postpone the

---

<sup>1</sup> As stated in the applicant's traffic study, the project is dependent on the extension of two city roadways i.e., the extensions of Discovery Way and Tradition Parkway as, at least, two-lane facilities to Range Line Road to show that adequate capacity is available to support the buildout of this project. Currently, these roads do not connect to Range Line Road. The construction of these roadways to Range Line Road are developer funded improvements in association with the developments of regional impact (DRIs) approved for the City's southwest annexation area. It is a concern that the County may approve development that relies upon the construction of infrastructure outside of the jurisdiction or control of the county, and further, that has been planned and designed for capacity solely to meet the needs of the planned and programmed development within the city.

SLC BOCC  
Page 3  
July 25, 2024

public hearing on the transmittal of this amendment to the Florida Department of Commerce until City staff, County staff, and the applicant have agreed to a mitigation plan or a condition of approval that addresses the City's concerns about impacts to City roads and needed County road improvements.

Sincerely,

  
Mary F. Savage-Dunham, AICP, CFM  
Director-Planning & Zoning

**Attachments**

cc: Jesus Merejo, City Manager  
Teresa Lamar-Sarno, Assistant City Manager  
Richard Berrios, City Attorney  
Elizabeth Hertz, Senior Deputy City Attorney  
Terrell Arline, Esquire  
Colt Schwerdt, P.E., Public Works Director & City Engineer  
Diana Spriggs, P.E. Assistant Director Public Works  
George Landry, St. Lucie County Administrator  
Mayte Santamaria, Deputy County Administrator II  
Benjamin Balcer, SLC Planning and Development Services Director  
Patrick Dayan, P.E. St. Lucie County Public Works Director  
Kori Benton, SLC Planning & Development Services  
Peter Buchwald, SLC TPO  
Larry Hymowitz, FDOT  
James D. Stansbury, Chief, Bureau of Community Planning and Growth, FDEO



Table 10. 2045 Total Traffic Roadway Analysis


Roadway	From	To	2045 Post-Development				Result	Notes
			Planned Service Laneage and Capacity		Peak Direction Volume	Vo/MSV Ratio		
			Laneage	Capacity				
(A)	(B)	(C)	(D)	(E)	(F)	(G)		
N/S A	Becker Rd	Paar Drive	4-Lanes	1,850	180	0.10	ACCEPT	
	Paar Drive	Marshall Pkwy	4-Lanes	1,850	433	0.23	ACCEPT	
	Marshall Pkwy	Discovery Way	4-Lanes	1,850	549	0.30	ACCEPT	
	Discovery Way	Gatlin Blvd	4-Lanes	1,850	690	0.37	ACCEPT	
Tradition Parkway/ Gatlin Blvd	Rangeline	N/S A	4-Lanes	1,850	1,033	0.56	ACCEPT	
	N/S A	Community Blvd	4-Lanes	1,850	1,455	0.79	ACCEPT	
Crosstown Parkway	Rangeline	N/S A	4-Lanes	1,940	1,803	0.93	ACCEPT	
	N/S A	Village Parkway	4-Lanes	1,940	1,851	0.95	ACCEPT	
Rangeline Road	Martin Hwy	Becker Rd	2-Lanes	1,110	1,083	0.98	ACCEPT	
	Becker Rd	Paar Drive	4-Lanes	1,850	1,082	0.58	ACCEPT	
	Paar Drive	Marshall Pkwy	4-Lanes	1,850	968	0.52	ACCEPT	
	Marshall Pkwy	Discovery Way	4-Lanes	1,850	1,218	0.66	ACCEPT	
	Discovery Way	Tradition Pkwy	4-Lanes	1,850	1,565	0.85	ACCEPT	
	Tradition Pkwy	Crosstown Pkwy	4-Lanes	1,850	1,939	1.05	FAILURE	Proportionate Share
Crosstown Pkwy	Glades Cut-Off Rd	4-Lanes	1,850	3,187	1.72	FAILURE	Proportionate Share	
Glades Cut-Off Rd	Rangeline Rd	Reserve Blvd	4-Lanes	1,850	2,307	1.25	FAILURE	Proportionate Share
Discovery Way	Rangeline Rd	N/S A	4-Lanes	1,850	568	0.31	ACCEPT	
	N/S A	N/S B	4-Lanes	1,850	648	0.35	ACCEPT	
	N/S B	Community Blvd	4-Lanes	1,850	1,227	0.66	ACCEPT	
	Community Blvd	Village Parkway	4-Lanes	1,850	1,450	0.78	ACCEPT	
Marshall Parkway	Rangeline	N/S A	2-Lanes	1,110	351	0.32	ACCEPT	
	N/S A	N/S B	4-Lanes	1,850	741	0.40	ACCEPT	
	N/S B	Community Blvd	4-Lanes	1,850	801	0.43	ACCEPT	




## MEMORANDUM

TO: Mayor and City Council Members

VIA: Jesus Merejo, ICMA-CM, City Manager   
Teresa Lamar-Sarno, AICP, ICMA-CM, Assistant City Manager 

THRU: Mary Savage-Dunham, AICP, CFM,  
Director of Planning & Zoning 

FROM: Bridget Kean, AICP, Deputy Director Planning & Zoning  BK

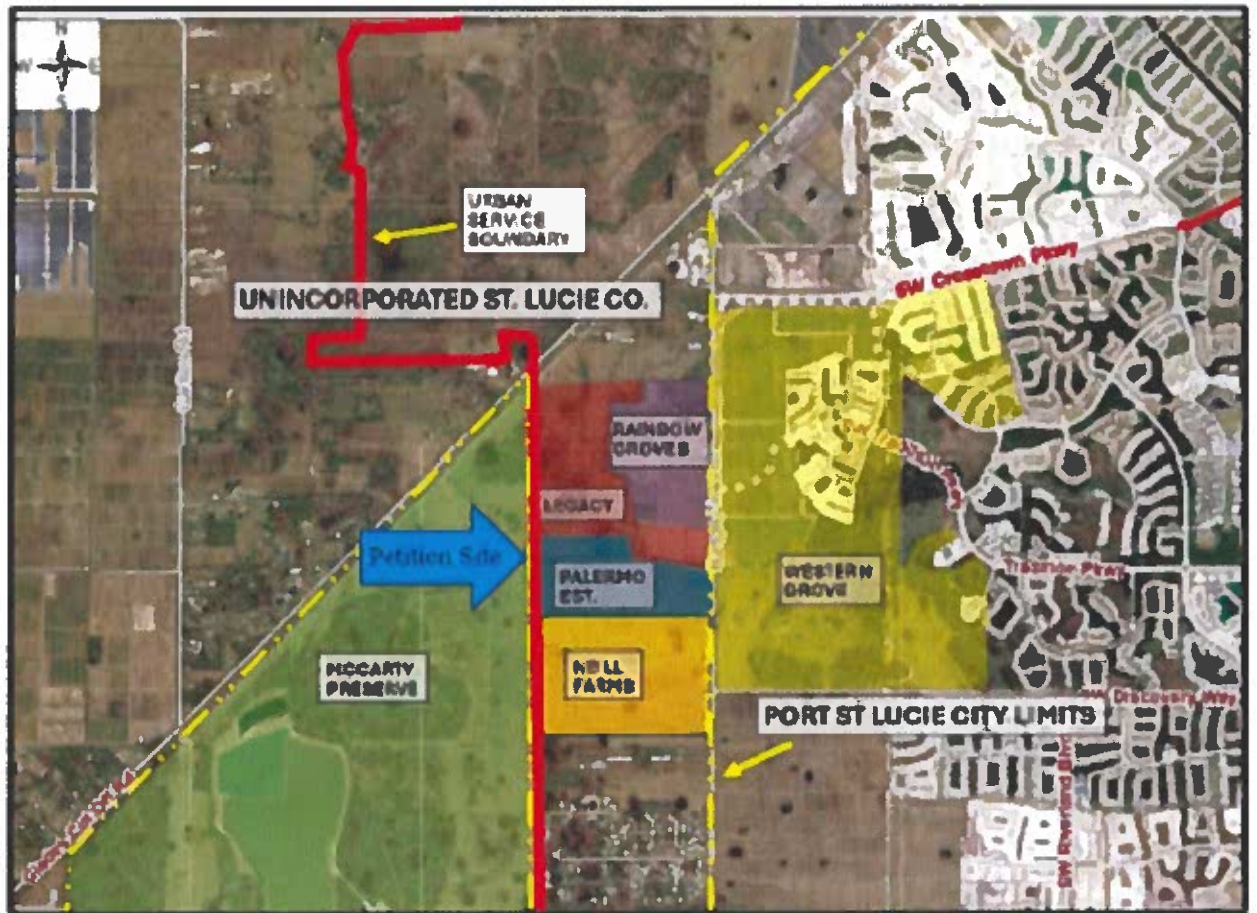
SUBJECT: Proposed Palermo Estates Development in St. Lucie County

DATE: April 19, 2024

City staff has been monitoring development proposals in St. Lucie County west of Range Line Road for potential impacts to City facilities. There is a project in St. Lucie County known as Palermo Estates for a proposed development consisting of 705-unit residential subdivision with single-family, duplex, and townhome units, amenity center, stormwater retention, and a natural preserve area on approximately 235 acres. The subject property is approximately two miles south of Glades Cut Off Road and immediately west of the Western Grove DRI. The property owner, OMBU Ranch Range Line, LLC, has applied for a comprehensive plan future land use map amendment to change the land use from AG-5 (Agricultural-5) to MXD (Mixed Use) and to rezone the property from AG-5 (Agricultural-5) to PUD (Planned Unit Development). The public hearings for the two applications were held for the April 16, 2024 St. Lucie County Planning Commission. Staff submitted a letter to St. Lucie County to be included in the public record for both applications.

The letter pertains to City staff's concerns that the applications are moving forward before potential impacts to City roadways are addressed. The letter is attached for Council's review.

The location of the Palermo Estates project is depicted in the following map:



CC: Richard Berrios, Interim City Attorney  
Elizabeth Hertz, Senior Deputy City Attorney  
Colt Schwerdt, Public Works Director  
Diana Spriggs, Assistant Director, Public Works



April 18, 2024

Benjamin Balcer, AICP, Director  
Planning & Development Services, St. Lucie County  
2300 Virginia Ave.  
Fort Pierce, FL 34982

Re: Palermo Estates- FLUMA-2303-000022 & PD-2307-000026  
Future Land Use Map Amendment and Official Zoning Atlas Amendment from AG-5  
(Agricultural-5) to PUD (Planned Unit Development) & Preliminary Site Plan

Dear Mr. Balcer:

The properties that are the subject of the above referenced applications are located immediately west of the municipal boundaries of the City of Port St. Lucie. The proposed applications will provide for the transition of approximately 235 acres of agricultural land to a St. Lucie County Mixed Use designation that will allow for the property to be rezoned to a PUD. The proposed use is a 705-unit subdivision with single-family, duplex, and townhome units and other amenities. The City of Port St. Lucie has been monitoring and reviewing the proposed development for impacts to City facilities. The City has provided comments from the City's 3<sup>rd</sup> Party Traffic Consultant, Kok Wan Mah, Kittelson & Associates, Inc. to County staff and the applicant. While the experience to date has been very collaborative, City staff does have concerns that the project is moving forward without impacts to the City facilities being fully addressed. As noted in the county's staff report for the applications for a future land use amendment, rezoning, and preliminary site plan approval, the development of the property is contingent upon the construction of Tradition Parkway and Discovery Way as, at least, two-lane facilities to Range Line Road. Tradition Parkway and Discovery Way are City roadways. At this time, these roads do not connect to Range Line Road. The construction of these roadways to Range Line Road are developer funded improvements in association with the developments of regional impact (DRIs) approved for the City's southwest annexation area. It is a concern that the County may approve development that relies upon the construction of infrastructure outside of the jurisdiction or control of the county, and further, that has been planned and designed solely to meet the needs of the planned and programmed development within the city.

The roadway network in the City's southwest annexation area between Range Line Road and Interstate 95 was planned and designed to accommodate the buildout of the approved DRIs within the City's southwest area. This roadway network was not planned nor designed to accommodate significant development in St. Lucie County west of Range Line Road. If additional capacity is needed on any of these roadways beyond what is required by the DRIs or prior to the DRI

commitments being triggered, the City would be the entity responsible for funding and constructing any additional improvements.

Per the City's 3<sup>rd</sup> Party Traffic Consultant's review, Palermo Estates traffic is shown to be significant on Discovery Way as identified in the applicant's traffic study. The applicant's traffic study includes a recommendation for the County to add Discovery Way as a 2-lane facility from Range Line Road to SW Brookside Falls Way, (current Terminus) to Map TRN 2 of the County's comprehensive plan to provide consistency between the County's comprehensive plan and the proposed Palermo Estates comprehensive plan amendment. The traffic study does not identify the timing when this improvement will be needed to serve the Palermo project. Furthermore, improvements to Discovery Way or any city roadways are not addressed in either the ordinance approving the comprehensive plan or the resolution approving the MPUD. The City feels strongly that impacts to Discovery Way and potential impacts to other city roadways need to be addressed before these applications are approved.

The City also has concerns about the reliance on the County's proportionate share program to address traffic impacts since the City is not a party to the County's proportionate fair share program. In addition, there is no guarantee that the funds collected from the proportionate fair share program would be used to address impacts on city roadways. The City does not yet have any assurance from the developer or the County that the City will not be left to bear the fiscal burden associated with increased infrastructure demands created by this project.

The City respectfully requests that the above referenced projects do not move forward to the County Commission until City staff, County staff, and the applicant have agreed to a mitigation plan or a condition of approval that provides the City assurances that any potential offsite impacts to city roadways will be addressed.

Given the number of large developments in this area of SLC, on the western boundary of the City, it may be beneficial for the county to prepare a thoroughfare plan that identifies the transportation improvements that are needed to serve the County's expanded urban service area west of Range Line Road including cross connections to avoid overburdening individual roadways and to provide more of a grid network.

The City appreciates the County's willingness to work with the City on the review of these projects. We look forward to further collaboration. We are asking that this letter be added to public record as part of the Planning and Zoning Commission's review of the above referenced projects.

Benjamin Balcer  
Page 3  
April 18, 2024

Sincerely,

*Bridget Kean*, Deputy Director, for

Mary F. Savage-Dunham, AICP, CFM  
Director-Planning & Zoning  
attachment

cc: Jesus Merejo, City Manager  
Teresa Lamar-Sarno, Assistant City Manager  
Richard Berrios, Interim City Attorney  
Elizabeth Hertz, Senior Deputy City Attorney  
Colt Schwerdt, P.E., Public Works Director & City Engineer  
Diana Spriggs, P.E. Assistant Director Public Works  
George Landry, St. Lucie County Administrator  
Mayte Santamaria, Deputy County Administrator II  
Patrick Dayan, P.E. St. Lucie County Public Works Director  
Kori Benton, SLC Planning & Development Services Thad  
Crowe, AICP, Senior Planner  
Kok Wan Mah, Kittelson and Associates, Inc.

TREASURE COAST REGIONAL PLANNING COUNCIL

MEMORANDUM

To: Council Members AGENDA ITEM 4B5  
From: Staff  
Date: September 13, 2024  
Subject: Local Government Comprehensive Plan Review  
Draft Amendment to the St. Lucie County Comprehensive Plan  
Amendment No. 24-03ESR

Introduction

The Community Planning Act, Chapter 163, *Florida Statutes*, authorizes the regional planning council to review local government comprehensive plan amendments prior to their adoption. The regional planning council review and comments are limited to adverse effects on regional resources or facilities identified in the Strategic Regional Policy Plan (SRPP) and extrajurisdictional impacts that would be inconsistent with the comprehensive plan of any affected local government within the region. Council must provide any comments to the local government within 30 days of the receipt of the proposed amendments and must also send a copy of any comments to the state land planning agency.

The amendment package from St. Lucie County was received on August 20, 2024 and contains one Future Land Use Map (FLUM) amendment with specific subarea policies. This report includes a summary of the proposed amendments and Council comments.

Summary of Proposed Amendment

The proposed amendment, known as Neill Farm Estates, changes the future land use designation on two parcels totaling approximately 421.28 acres from Agricultural-5 (AG-5) to Mixed Use Development (MXD) with associated sub-area policies. The subject parcels are located on the west side of Range Line Road, approximately 2.3 miles south of Glades Cut Off Road. Adjacent future land use designations include AG-5 to the north and south; City of Port St. Lucie New Community District to the east; and City of Port St. Lucie Utilities to the west. The proposed amendments will result in an increase of potential residential development of 1,191 dwelling units.

The County staff report indicates that while this area historically was a rural area dominated by orange groves, the City of Port St. Lucie has grown westward through the Tradition, Western Grove, Southern Grove, Riverland/Kennedy and Wilson Groves Developments of Regional Impact (DRI) which provide for nearly 37,000 dwelling units as well as millions of square feet of retail, office and industrial development. Additionally, the 2022 expansion of the St. Lucie County Urban Service Area to the eastern boundary of the McCarty Ranch Preserve (and the western

boundary of the subject site) allows for suburban future land use, zoning, and development in this area.

It is noted in the County staff report that the initial application was to amend the FLUM for the subject land area from AG-5 Future Land Use, which allows one dwelling unit per five acres, to RU (Residential Urban) which allows up to five dwelling units per acre. County staff did not believe a 25-fold increase in the maximum permitted residential density was consistent with this location at the western edge of the Urban Services Boundary. While the applicant (as successor) also submitted a request to rezone to Planned Unit Development that provided residential density of 3 dwelling units per acre, the only available residential future land use designations were RS (Residential Suburban) that allows two dwelling units per acre or RU which allows up to 5 dwelling units per acre. Given the unique circumstances affecting this location in the newly expanded Urban Services Boundary, County staff suggested the MXD Future Land Use designation accompanied by Specific Use Activity Area sub-area policies might be the most appropriate future land use designation and the Applicant agreed to modify the request to the MXD Future Land Use classification with sub-area policies limiting development to residential use. The proposed sub-area policies are as follows:

Notwithstanding the other goals, objectives and policies of the Comprehensive Plan, development in the Neill Farm Estates MXD Specific Use Activity Area shall be subject to the site-specific provisions listed in the County staff report and shown below. If a Comprehensive Plan provision is not specifically addressed in the Neill Farms Estates sub-area policy, then the adopted and effective Comprehensive Plan and Land Development Code (LDC) in effect on the date of the final decision on a development application shall control.

1. The Neill Farm Estates MXD Specific Use Activity Area is permitted to develop as a residential community with a density that shall not exceed 3 dwelling units per acre for a maximum total of 1,275 dwelling units.
2. Residential development permitted within the Neill Farms Estates MXD Specific Use Activity Area may include amenity and recreational centers, such as clubhouses, social buildings, fitness centers, and recreational open spaces, and other accessory uses to serve the residents. Amenity and recreation areas may include food services with or without alcoholic beverage sales/consumption.
3. No building height shall exceed 35 feet.
4. The building spacing formula, set forth in LDC Section 7.04.03 shall not be applicable to town home development within Neill Farm Estates MXD Specific Use Activity Area.
5. Residential dwelling types may include single-family, duplexes, and multifamily town homes. To promote affordability in the form of varied pricing levels, a minimum of ten percent (10%) of the total units shall be attached dwelling units.
6. The restriction for the cul-de-sac length of up to 1,000 feet set forth in LDC Section 7.01.03 may be waived by the County Commission at their discretion as part of the PUD approval process.
7. The Neill Farm Estates MXD Specific Use Activity Area shall provide a buffer/transition area between the McCarty Ranch Preserve and any homes along the western boundary of the development.
8. Neill Farm Estates MXD Specific Use Activity Area shall be developed as a 55+ age restricted community that complies with an exemption to the Fair Housing Act.

9. Due to the proximity of the future commercial area at the southeast corner of Range Line Road and S.W. Discovery Way, as well as other commercial, civic and institutional areas planned and/or under construction within the Riverland and Western Groves DRI's on the east side of Range Line Road proximate to the Neill Farm Estates development, and the Oak Ridge Ranches Mixed Use Activity Area, planned +/- two miles north, the Neill Farm Estates MXD Specific Use Activity Area is permitted to develop exclusively as an active adult, age-restricted residential community.
10. A minimum of 40% (forty percent) of the gross site area shall comprise common open space, which may be owned or controlled by a homeowner's association or a Community Development District (CDD). The surface area at the control elevation for stormwater ponds or lakes shall comprise no more than 50% of the required common open space.
11. Neill Farm Estates MXD Specific Use Activity Area shall designate no less than 35 (thirty-five) acres as a preservation tract, including native upland habitat, created upland habitat, wetlands, and wetland buffers. Neill Farm Estates MXD Specific Use Activity Area shall preserve and enhance/restore 20.8 acres of freshwater marsh (Wetlands A, 1, 2, 4, 5, 9, 11), 9.2-acres of pine flatwoods, and 3.0 acres of created pine flatwoods. The above being described is in the approved Environmental Impact Report entitled "Environmental Impact Report and Wetland Waiver" prepared by EW Consultants, Inc., dated May 2024.
12. To satisfy tree mitigation requirements, the 9.2 acres of pine flatwoods, and the 3.0 acres of created pine flatwoods must be preserved as depicted in the final approved Environmental Impact Report dated May 2024, prepared by EW Consultants, Inc. These preserved upland habitats shall be placed under a conservation easement accompanied by a Preserve Area Management and Monitoring Plan (PAMMP) prior to the issuance of the vegetation removal permit.
13. A sketch and legal description of the preserved wetlands, associated upland vegetative buffers, native upland habitat, or other preservation tracts shall be provided with the site plan for each phase. The preserved wetlands and associated upland vegetative buffers shall be placed under a conservation easement in favor of St. Lucie County prior to the issuance of the vegetation removal permit.
14. Internal pedestrian circulation and connectivity shall be achieved through a network of sidewalks and trails that efficiently connect homes, amenities, and parks. This connectivity within the Neill Farm Estates MXD Specific Use Activity Area shall be accomplished by providing a minimum of two pedestrian connections per residential pod in the form of:
  - (1) a sidewalk connection from each residential pod to the main community spine road sidewalk which provides a sidewalk connection to the community recreation area and two project entrances; and/or
  - (2) a designated walking path (which may be stabilized grass or mulch) that connects one residential pod to another residential pod; and/or
  - (3) a designated walking path (which may be stabilized grass or mulch) or boardwalk within a natural area that connects to a stabilized grass walking path within an adjacent residential pod.
15. Neill Farm Estates MXD Specific Use Activity Area shall provide or reserve an area designated for pedestrian connectivity with the land area to the north. Pedestrian connectivity between adjacent developments may include access-controlled facilities. Options for satisfying this requirement may include, but are not limited to, the following:
  - (a) a pedestrian connection located no more than 900 feet from the eastern property line,
  - or (b) a pedestrian connection to a public pedestrian trail running east-west along the shared



- property boundary between Neill Farm Estates and the land area to the north, linking Range Line Road to the McCarty Ranch Preserve. If Neill Farm Estates is required to convey land to accommodate the public pedestrian trail, the adjacent property boundary setback or buffer required by the County shall be reduced by the width of land conveyed.
16. Traffic generated by the Neill Farm Estates MXD Specific Use Activity Area which exceeds level of service standards adopted in the Transportation Element of the Comprehensive Plan shall be mitigated by the development through a schedule of committed roadway construction projects or payments or alternative conditions, as provided in the conditions of approval for the Neill Farm Estates Planned Development Plan.
  17. No building permits for residential units in the Neill Farm Estates MXD Specific Use Activity Area shall be issued until S.W. Discovery Way is open for public use as a minimum two (2) lane roadway to Range Line Road.
  18. If required by the County, the Neill Farm Estates MXD Specific Use Activity Area shall provide for vehicle connectivity between Neill Farm Estates and the land area to the north. This connection is not required to be located further west than 900 feet from the eastern property line and shall terminate at the Neill Farm Estates northernmost roadway connection to Range Line Road. This connection shall not be required to be wider than a 70-foot road section. If additional improvements are required to satisfy transportation concurrency, the Neill Farm Estates MXD Specific Use Activity Area will provide project design, transportation improvements and/or proportionate share payments to be constructed or paid by the developer(s) or successor(s) in interest, as necessary to satisfy transportation concurrency related to any offsite requirements but no further traffic improvements shall be required within the Neill Farm Estates MXD boundaries.
  19. To improve multimodal options and reduce vehicular traffic, the Neill Farm Estates MXD developer(s) and successor(s) in interest shall diligently pursue all approvals from permitting regulatory authorities to authorize interconnectivity with Riverland DRI (the adjacent development located east of Range Line Road) by elevating a section of Range Line Road to allow golf cart, bike and pedestrian access under Range Line Road between the two communities (the "Elevated Roadway System"). The developer(s) and successor(s) in interest will be fully responsible for design and construction of (or payment for) the Elevated Roadway System for this section of Range Line Road. Prior to obtaining all approvals of the Elevated Roadway System, the developer(s) or successor(s) in interest will be required to enter into an agreement with St. Lucie County that addresses future maintenance and replacement. In the event the parties cannot agree upon the terms of such agreement, the roadway section shall not be an Elevated Roadway System.
  20. The Neill Farm Estates MXD Specific Use Activity Area developer(s) or successor(s) in interest shall satisfy, the requirements in Policy #19 above for the design and construction of (or payment for) the Elevated Roadway System, in accordance with a schedule approved by the County, which shall be a binding and legally enforceable commitment on the developer, its agents, lessees, successors or assigns with the County to assure construction or a proportionate share payment, as allowed by law. The Neill Farm Estates MXD Specific Use Activity Area developer(s) or successor(s) in interest shall be entitled to receive County road impact fee credits for the road improvements identified in the County's Comprehensive Plan or in the St. Lucie Transportation Planning Organization Long Range Transportation Plan (needs plan) that increase capacity for the use of the general public along Range Line Road and/or the donation of related right-of-way, in accordance with

County Code of Ordinances and Land Development Code; the developer(s) or successor(s) in interest shall not be entitled to receive County road impact fee credits for the difference in the design and costs of construction (or payment for) between the Elevated Roadway System and the roadway identified in the County's Comprehensive Plan or in the St. Lucie Transportation Planning Organization Long Range Transportation Plan (needs plan).

21. Neill Farm Estates MXD Specific Use Activity Area shall be served by central potable water and sanitary sewer systems. Such centralized services shall be coordinated with St. Lucie County Utilities. The Planned Development Plan shall be designed so there will be no net public cost for the provision of water lines, sewage lines, storm and surface drainage systems, or other utility systems.
22. All real estate transactions within the Neill Farm Estates MXD Specific Use Activity Area shall include disclosure to purchasers that the property is proximate to existing agricultural uses. Pursuant to Section 823.14(4), F.S., adjacent agricultural activities in existence for 1 year or more before the creation of the Neill Farm Estate MXD Specific Use Activity Area are presumed to not be a nuisance if the farm activities and operations conform to generally accepted agricultural and management practices. Such real estate disclosures shall also state that Range Line Road is a designated freight route.
23. No more than three (3) single-family dwelling units with the same elevation may be placed next to each other on the same side of the street. An alternative elevation must be introduced on the fourth (4th) single-family dwelling unit.

The County staff report states that this property and other Range Line Road properties within the expanded Urban Service Boundary are good candidates for the MXD FLUM designation. Factors cited include the recent incorporation into the Urban Services Boundary; the need to provide for proper transition between the rapidly urbanizing land to the east and rural and agricultural lands to the west; adjacency to the 3,800-acre McCarty Ranch Preserve and the branch of the FEC Railway; limited ability to provide for roadway connectivity to the west; the rapid pace of the development proposals generated for this area of the County; the need for consideration of impacts of development within the City and the County; and to ensure sustainable development concepts such as transportation connectivity, walkability, and open space preservation.

The County staff report indicates that the subject site is adjacent to growth areas noted in western Port St. Lucie and extending into unincorporated St. Lucie County, where public facilities and services including, but not limited to, central water and sewer capacity and roads, are already in place or are in the planning stage.

With respect to transportation impacts, the Applicant's Traffic Analysis assumes the development of 1,263 age-restricted 55+ dwelling units pursuant to the MXD Future Land Use and Specific Use Activity Area sub-area policies, whereas the maximum number of dwelling units under the AG-5 Future Land Use is 85 detached single-family dwellings, equaling a net increase of 1,191 units. The Institute of Traffic Engineers Trip Generation methodology predicts that 55+ age-restricted developments generate only half the number of trips as non-age-restricted single-family detached dwellings. A third-party reviewer indicates that assuming the maximum trip generation potential of the proposed development, Range Line Road and Glades Cut Off Road will require capacity improvements to support project traffic and future year traffic volumes. Additionally, County staff indicates in the report that concurrency for public facilities and services, including transportation,

must be demonstrated during review and approval of requests for re-zoning and approval of Preliminary Development Plans.

St. Lucie County currently has solid waste disposal facilities to satisfy the needs of the development potential for the subject site and the County is actively assessing alternative disposal strategies and capacity renewal programs. Presently, the St. Lucie County Bailing & Recycling facility has nearly one million cubic yards of capacity remaining, correlating to a multiple decade service period remaining, without accounting for waste reduction or capacity renewal programs that may be implemented.

The County's Environmental Resources Department staff has indicated the proposed amendments are not intended to result in any adverse environmental impacts, as no development activities are proposed at this time. When site development activities are proposed, ERD will conduct further review through the site plan and/or building permit review process.

### Regional Impacts

No adverse effects on regional resources or facilities have been identified, however potential significant impacts to Range Line Road and Glades Cut-Off Road have been identified, both of which (as CR 709) are part of the regional roadway network as listed in the Strategic Regional Policy Plan. With respect to transportation impacts, Council encourages the County to coordinate transportation needs with the City of Port St. Lucie, the Florida Department of Transportation, the St. Lucie County Transportation Planning Organization, and transit providers. A coordinated multi-jurisdictional transportation and roadway study of the impacts of all the recently approved development and potential development in the expanded Urban Service Boundary in the vicinity should be undertaken in lieu of piecemeal development approvals.

### Extrajurisdictional Impacts

Council requested comments from local governments and organizations expressing an interest in reviewing the proposed amendment on August 20, 2024. The County staff reports notes that agencies including the Florida Department of Transportation (FDOT), the St. Lucie County Transportation Planning Organization (TPO), and the City of Port St. Lucie were notified of the requested FLUM amendment through routine Development Review Committee notices. In addition, County staff has provided traffic and other documents to the City of Port St. Lucie. The City's staff and traffic consultant have participated in the review process and provided feedback on the Traffic Impact Report to the County and Applicants. In the City of Port St. Lucie's correspondence dated July 25, 2024, it requested addition of the two following sub-area policies to the Neill Farm MXD Specific Use Activity Area:

- A revised traffic impact analysis and coordination with the City on the review of future traffic studies shall be required in the event there is modification to the density cap or land use.
- A north-south road be provided for along the western boundary of the land that is the subject of these proposed amendments .

The City of Port St. Lucie has requested that the transmittal public hearing on the Neill Farm amendments be postponed until City staff, County staff, and the applicant have agreed to a mitigation plan or a condition of approval that addresses the City's concerns regarding impacts to City roads, needed County road improvements, and the need for the sub-area policies to require new traffic studies with any proposed changes

### Conclusion

Potential adverse effects on regional resources or facilities and potential extrajurisdictional impacts have been identified. The County and the City of Port St. Lucie, as well as partners at FDOT and the St. Lucie TPO, should work together to plan the land uses and transportation network on a comprehensive and integrated basis for this rapidly changing area, including alternatives to Range Line Road. In addition, the County should revise sub-area policy #18 to provide that vehicular interconnections will be provided to the property to the north and to the south. This will enhance movement among the thousands of dwelling units, and many thousands of new residents of this area, without the need to further burden Range Line Road.

### Recommendation

Council should approve this report and authorize its transmittal to St. Lucie County and FloridaCommerce.

### Council Action – September 20, 2024

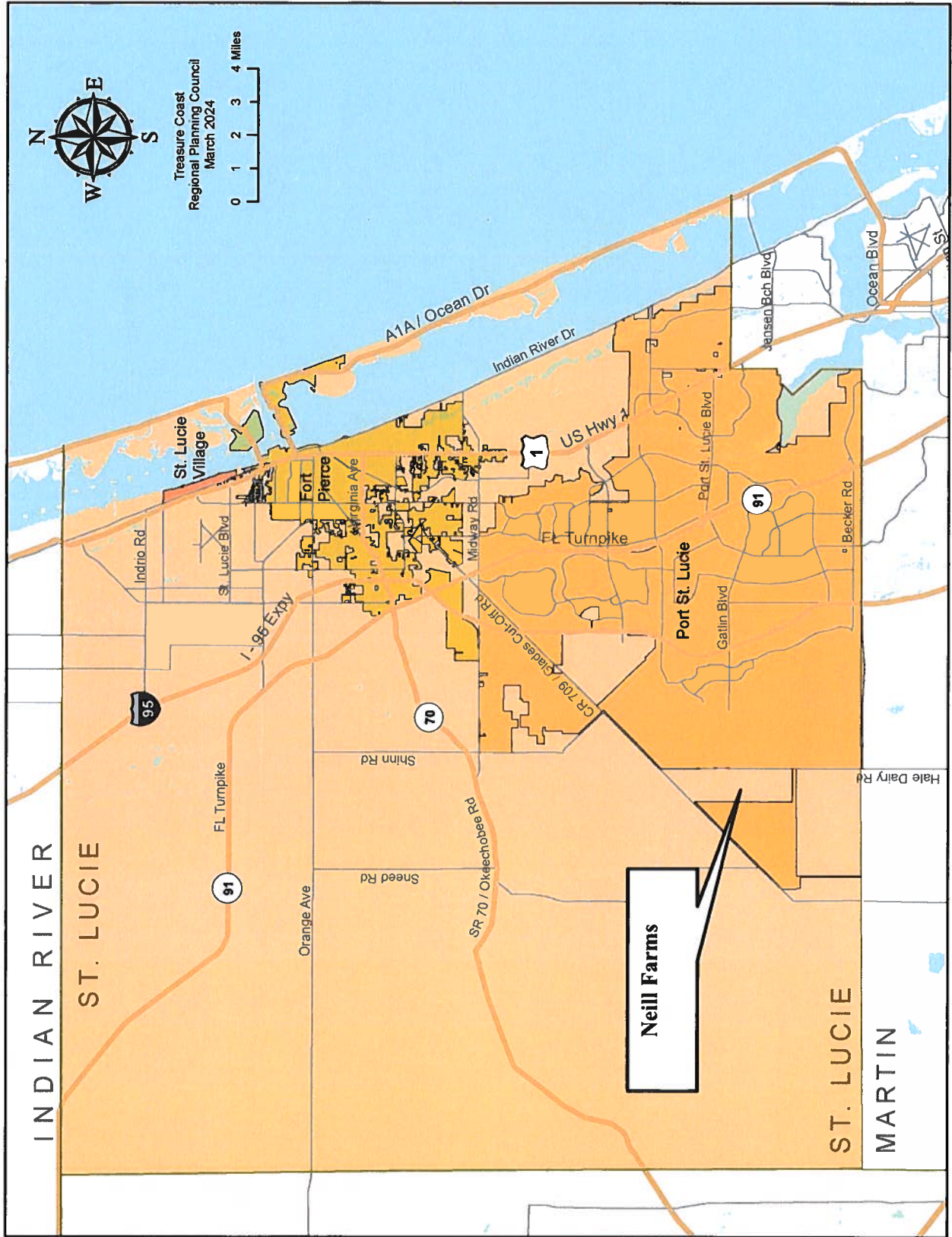
Attachments

# List of Exhibits

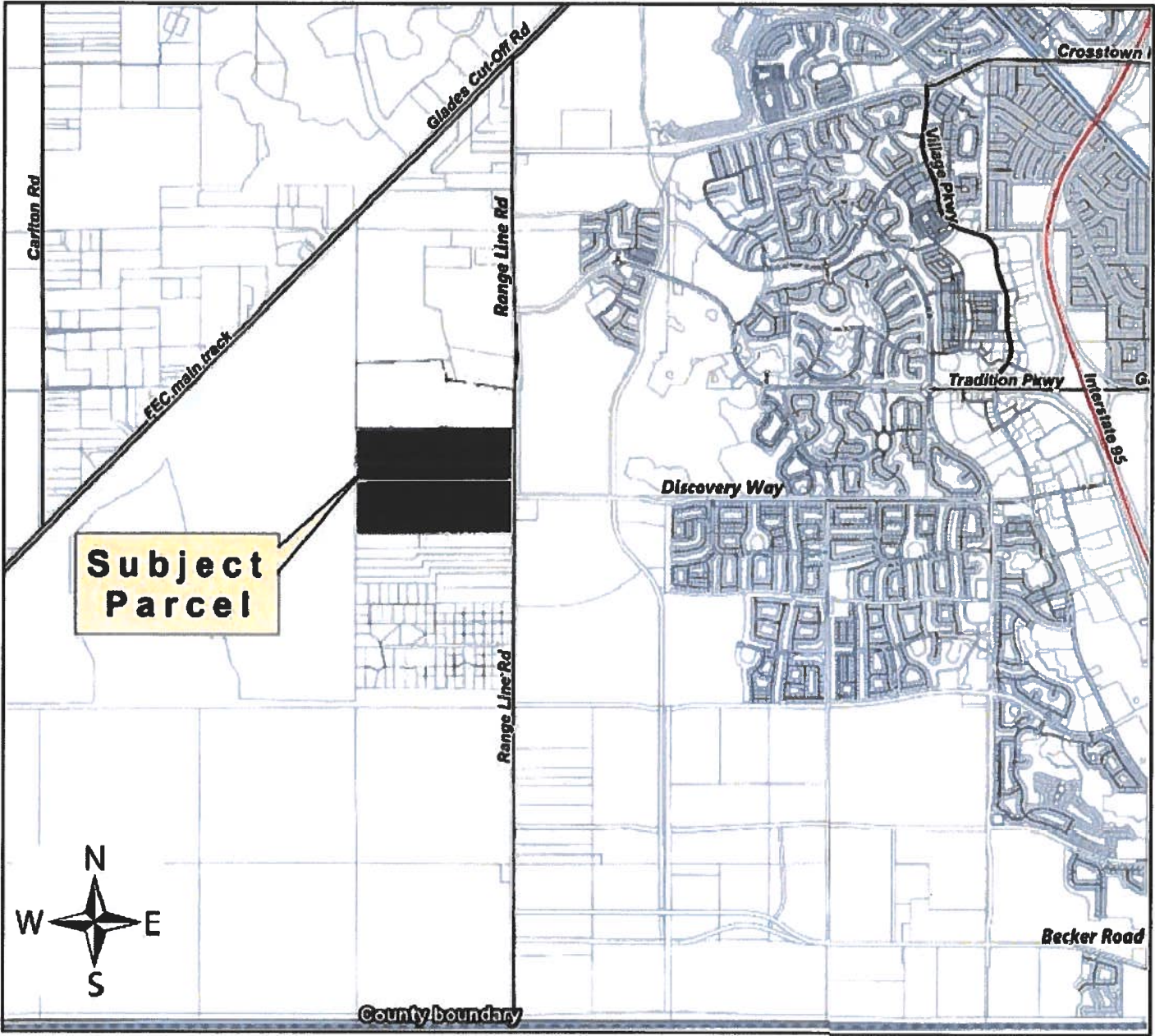
## Exhibit

- 1 General Location Map
- 2 Property Location Map
- 3 Contextual Map of Proposed Range Line Road Developments
- 4 Existing Future Land Use Map
- 5 Proposed Future Land Use Map

# Exhibit 1 General Location Map



# Exhibit 2 Property Location Map

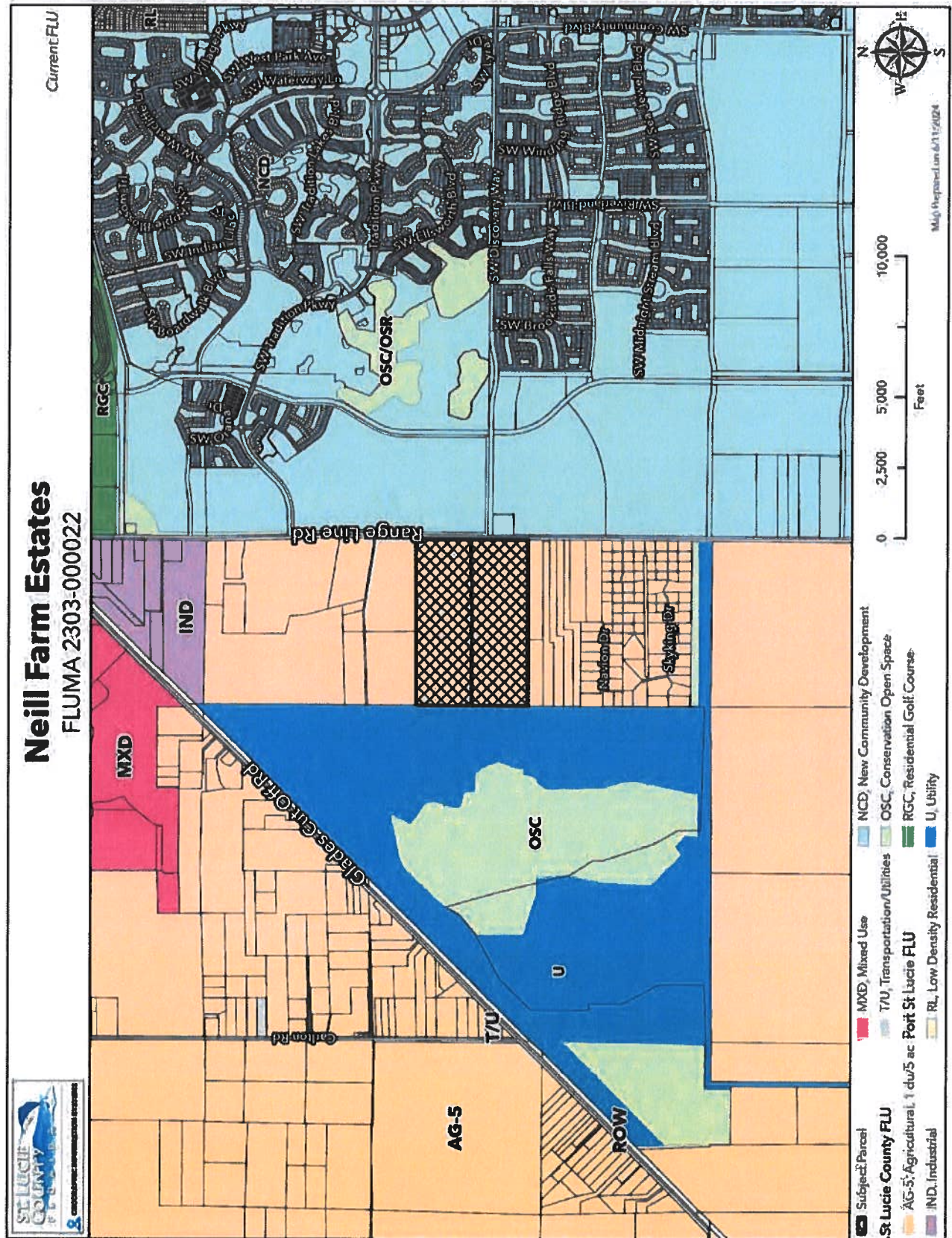


**Exhibit 3**  
**Contextual Map of Proposed Range Line Road Developments**

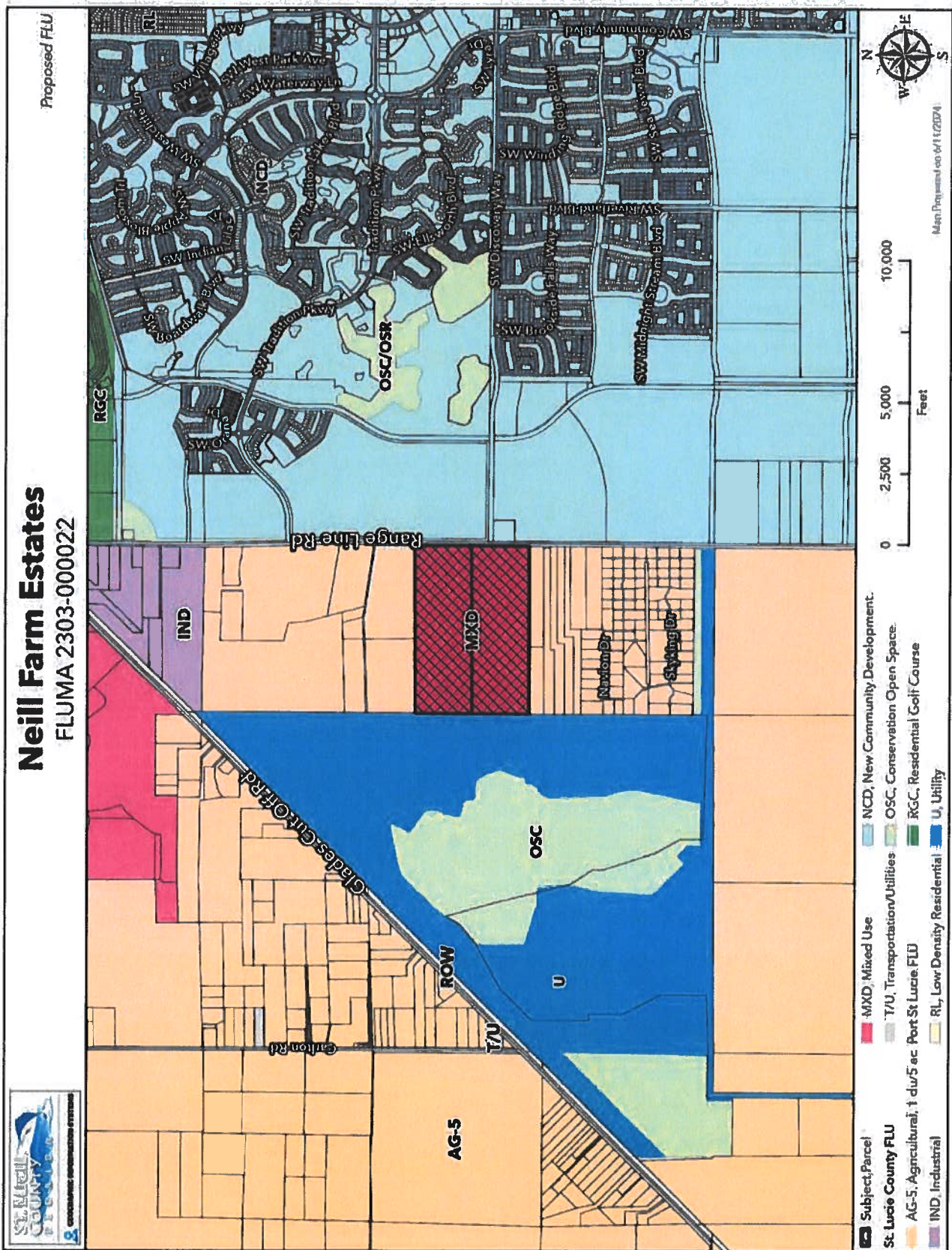




# Exhibit 4 Existing Future Land Use Map



# Exhibit 5 Proposed Future Land Use Map



TREASURE COAST REGIONAL PLANNING COUNCIL

MEMORANDUM

To: Council Members AGENDA ITEM 4B4  
From: Staff  
Date: September 13, 2024  
Subject: Local Government Comprehensive Plan Review  
Draft Amendment to the St. Lucie County Comprehensive Plan  
Amendment No. 24-02ESR

Introduction

The Community Planning Act, Chapter 163, *Florida Statutes*, authorizes the regional planning council to review local government comprehensive plan amendments prior to their adoption. The regional planning council review and comments are limited to adverse effects on regional resources or facilities identified in the Strategic Regional Policy Plan (SRPP) and extrajurisdictional impacts that would be inconsistent with the comprehensive plan of any affected local government within the region. Council must provide any comments to the local government within 30 days of the receipt of the proposed amendments and must also send a copy of any comments to the state land planning agency.

The amendment package from St. Lucie County was received on August 20, 2024 and contains one Future Land Use Map (FLUM) amendment with specific subarea policies. This report includes a summary of the proposed amendments and Council comments.

Summary of Proposed Amendment

The proposed amendment changes the future land use designation on six parcels totaling approximately 235.44 acres from Agricultural-5 (AG-5) to Mixed Use Development (MXD) with associated sub-area policies. The subject parcels are located on the west side of Range Line Road, approximately 2 miles south of Glades Cut Off Road. Adjacent future land use designations include AG-5 to the north and south; City of Port St. Lucie New Community District to the east; and City of Port St. Lucie Utilities to the west. With the adoption of this FLUM amendment, the applicant plans to advance adoption of a companion zoning amendment and preliminary Planned Unit Development Site Plan approval for a 705-unit subdivision with single-family, duplex, and townhome units, including landscape buffers, an amenity center, stormwater retention ponds, and a natural preserve area, to be known as the Palermo Estates MXD. The proposed amendments will result in an increase of potential residential development of 658 dwelling units.

The County staff report indicates that while this area historically was a rural area dominated by orange groves, the City of Port St. Lucie has grown westward including the 8,200-acre Tradition development, which includes the Western Grove Development of Regional Impact located across

Range Line Road from the subject property. Western Grove is a partially developed mixed-use master planned community, with entitlements of up to 4,000 residential dwelling units; 200,000 square feet of retail; and 50,000 square feet of office. A contextual map of developments along Range Line Road is included as Exhibit 3. The County staff report states that this property and other Range Line Road properties within the expanded Urban Service Boundary are good candidates for the MXD FLUM designation in order to accomplish the appropriate transition of density between the City of Port St. Lucie and the conservation and agricultural lands to the west, and ensure sustainable development concepts such as transportation connectivity, walkability, and open space preservation.

The applicant and County staff have agreed upon the following recommended MXD sub-area policies as shown in the County Staff Report:

1. Development permitted within this Mixed-Use property may include residential with a density of up to three (3) dwelling units per acre, and a height limit of up to 35 feet. The Final Site Plan shall provide for a transition of density and lot sizes from higher in the eastern portion of the properties to lower in the western portion of the properties.
2. Residential uses shall include single-family, duplexes, and multifamily townhomes and may include age restricted housing (55+).
3. Development permitted within this Mixed-Use property may include nonresidential uses limited to an amenity/recreational center with a clubhouse, social building, fitness center, and recreational passive trails through the preserve area.
4. The restriction for the cul-de-sac length of up to 1,000 feet set forth in LDC Section 7.01.03 will not be applicable to development within this Mixed-Use property, where authorized by the St. Lucie County Fire District.
5. The restrictions for building spacing for townhomes set forth in LDC Section 7.04.03 will not be applicable to the development within this Mixed-Use property.
6. A minimum of 45% of the gross site area must be used as common open space.
7. The Palermo Estates development is required to designate 27.6 acres as a preservation tract, including native habitat, wetlands, and wetland buffers.
8. Development permitted within this Mixed-Use property is required to preserve a minimum 15% of upland habitat, as determined by the final approved wetland jurisdictional and Environmental Impact Report. Tracking of preserved native uplands must be submitted and implemented with every development application. Any requirements for easements, preservation, and other aspects of wetlands and their associated upland vegetative buffers will be handled during the site plan application for each phase or pod.
9. Internal development connectivity shall be achieved through an interconnected pedestrian network of sidewalks and trails that efficiently connect homes, amenities, and parks.
10. The development shall provide or reserve areas designated for vehicular and pedestrian interconnectivity with adjacent parcels. Vehicular access shall encourage connectivity and provide for dispersal and flow of vehicular traffic between adjacent uses. Connectivity between adjacent developments may include access controlled facilities.
11. Traffic generated by the MXD which exceeds level of service standards adopted in the Transportation Element of the Comprehensive Plan shall be mitigated by the development through a schedule of committed roadway construction projects or payments or alternative conditions, as provided in the conditions of approval for the Palermo Estates Planned Development Plan.

12. All development within the MXD shall be serviced by centralized potable water and sanitary sewer systems. Such centralized services shall be coordinated with St. Lucie County Utilities. The PUD shall be designed and located so there will be no net public cost for the provision of water lines, sewage lines, storm and surface drainage systems, and other utility systems.
13. All real estate transactions within the MXD shall include disclosures noting that the property is in proximity to existing agricultural uses, a freight railroad line, airstrip, and truck traffic along Range Line Road. Pursuant to Section 823.14(4), F.S., adjacent agricultural activities in existence for one year or more before the creation of the Palermo Estates Mixed-Use Activity Area are presumed to not be a nuisance if the farm activities and operations conform to generally accepted agricultural and management practices.

The County staff report states that the subject site is adjacent to growth areas noted in western Port St. Lucie and extending into unincorporated St. Lucie County, where public facilities and services including, but not limited to, central water and sewer capacity and roads, are already in place or are in the planning stage. Potable water and wastewater services for the subject property will be provided by St. Lucie County Utilities (SLCU). The SLCU has plans underway to expand facilities to serve the anticipated growth and expand water and wastewater lines throughout their service territory.

With respect to transportation impacts, the County staff report states that the applicant's Transportation Impact Report (TIR), based on the development scenario of 515 single family detached homes, and 190 multi-family (townhomes) units, indicates that at build-out the project will significantly impact nine road segments (traffic will exceed 5% of segment capacity). While a detailed site-specific analysis will be required to assess the need for roadway improvements and project mitigation, the applicant has proposed proportionate fair share payments up to \$5,921,113 to mitigate transportation impacts. The County staff report indicates that the applicant has also agreed to external connectivity (stated in sub area Policy #10), providing or reserving areas designated for vehicular and pedestrian interconnectivity with adjacent parcels. Additionally, the development of the property is contingent upon the construction of Tradition Parkway and Discovery Way as at least two-lane facilities to Range Line Road. Multiple turn lanes and eventual signalization are anticipated for the development.

St. Lucie County currently has solid waste disposal facilities to satisfy the needs of the development potential for the subject site and the County is actively assessing alternative disposal strategies and capacity renewal programs. Presently, the St. Lucie County Bailing & Recycling facility has nearly one million cubic yards of capacity remaining, correlating to a multiple decade service period remaining, without accounting for waste reduction or capacity renewal programs that may be implemented.

The County's Environmental Resources Department's (ERD) preliminary analysis indicated that the site was heavily impacted by past agricultural practices, and recognized the MXD intent to preserve native trees, identified the need to address forage impacts (to wading birds), and remove exotic plants. MXD Sub-Area Policies # 7 and #8 commit the Applicant to a preservation area of at least 27.6 acres and retaining at least 15% of upland native habitat. ERD does not object to the proposed impacts to two wetlands but supports preservation of a third wetland that appears to be of moderate quality. More detailed analysis and mitigation planning will occur at the Final Site Plan stage.

### Regional Impacts

Potential impacts to Range Line Road and Glades Cut-Off Road have been identified, both of which (as CR 709) are part of the regional roadway network listed in the Strategic Regional Policy Plan. With respect to transportation impacts, Council encourages the County to continue to coordinate transportation needs with the City of Port St. Lucie, the Florida Department of Transportation, the St. Lucie County Transportation Planning Organization, and transit providers. A coordinated multi-jurisdictional transportation and roadway study of the impacts of all the recently approved development and potential development in the expanded Urban Service Boundary in the vicinity should be undertaken in lieu of piecemeal development approvals.

### Extrajurisdictional Impacts

Council requested comments from local governments and organizations expressing an interest in reviewing the proposed amendment on August 20, 2024. No comments on extrajurisdictional impacts have been received by Council. The County staff reports states that the Florida Department of Transportation (FDOT) and the St. Lucie Transportation Planning Organization (TPO) were notified of the proposed petitions and received notification of development review process. Additionally, the City of Port St. Lucie has been provided traffic and other documents and has participated in the review process and provided feedback on the TIR to the County and applicants.

### Conclusion

Potential adverse effects on regional resources or facilities and potential extrajurisdictional impacts have been identified. The County and the City, as well as partners at FDOT and St. Lucie TPO, should work together to plan the land uses and transportation network on a comprehensive and integrated basis for this rapidly changing area, including alternatives to Range Line Road. In addition, the County should revise sub-area policy #10 to provide that vehicular interconnections will be provided to the property to the north and to the south. This will enhance movement among the thousands of dwelling units, and many thousands of new residents of this area, without the need to further burden Range Line Road.

### Recommendation

Council should approve this report and authorize its transmittal to St. Lucie County and FloridaCommerce.

### Council Action – September 20, 2024

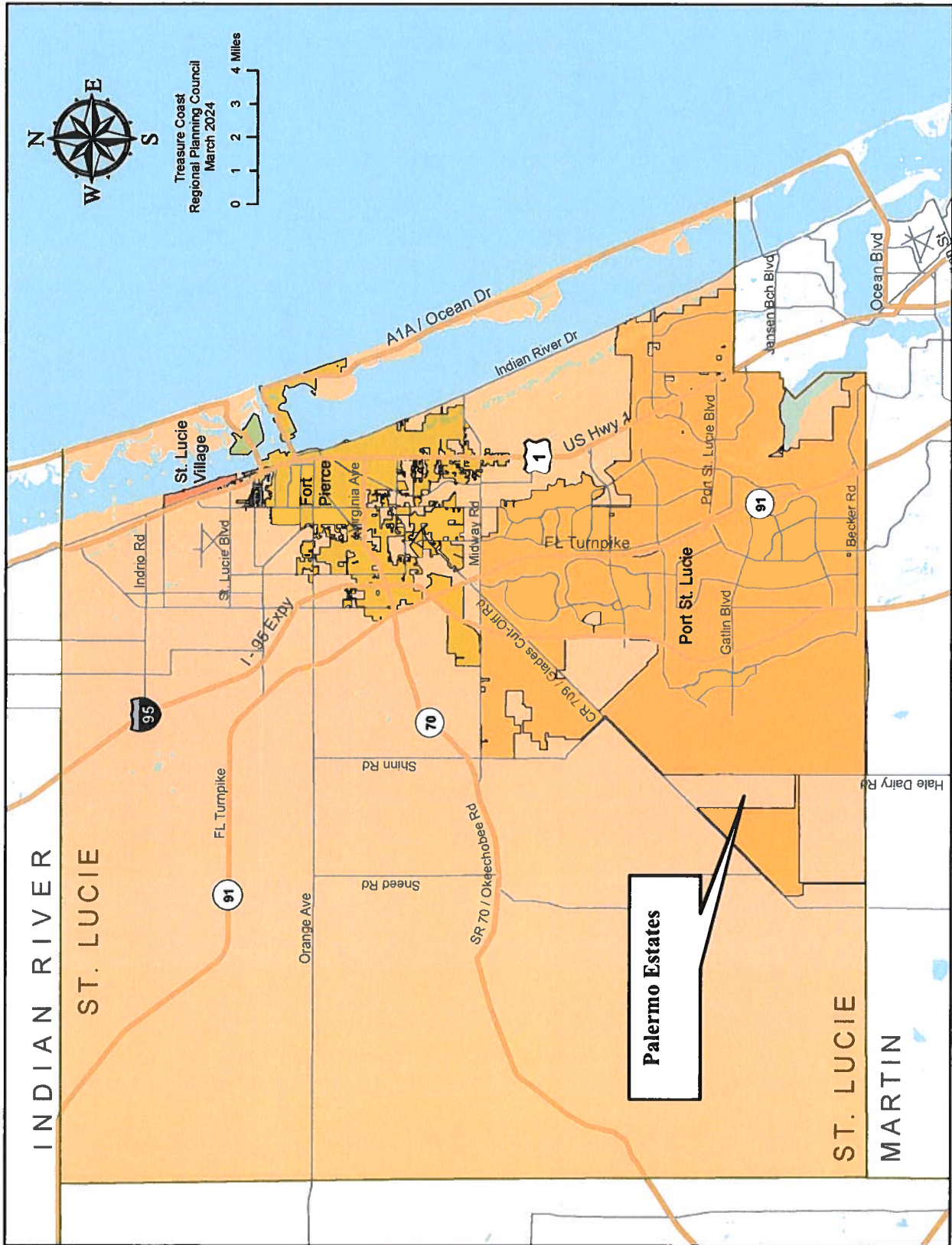
### Attachments

# List of Exhibits

## Exhibit

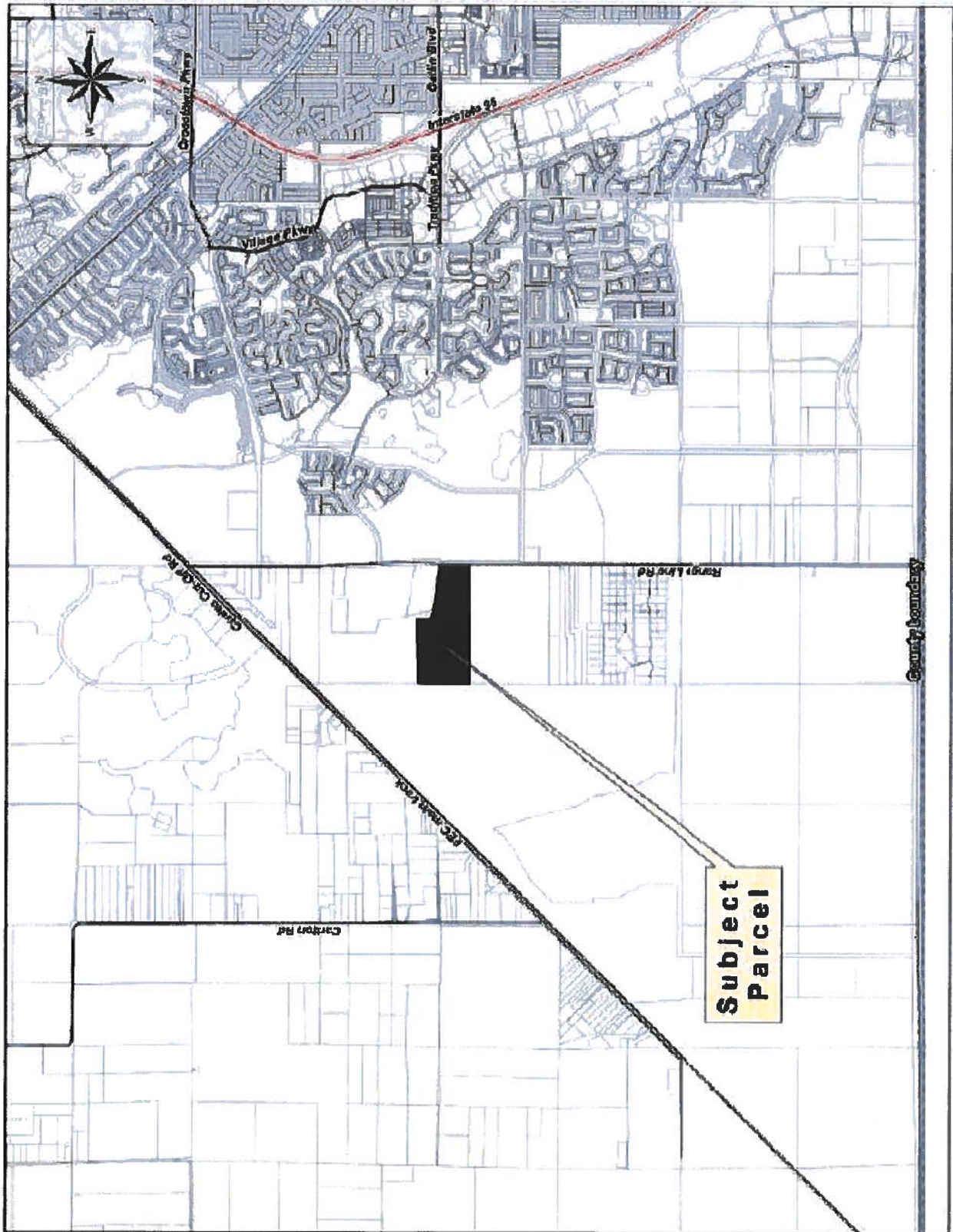
- 1 General Location Map
- 2 Property Location Map
- 3 Contextual Map of Proposed Range Line Road Developments
- 4 Existing Future Land Use Map
- 5 Proposed Future Land Use Map

# Exhibit 1 General Location Map





# Exhibit 2 Property Location Map



# Exhibit 3 Contextual Map of Proposed Range Line Road Developments



# Exhibit 4 Existing Future Land Use Map

