

January 23, 2024

Honorable Jerry L. Demings, Orange County Mayor
Honorable Nicole H. Wilson, Commissioner District 1
Honorable Christine Moore, Commissioner District 2
Honorable Mayra Uribe, Commissioner District 3
Honorable Maribel Gomez Cordero, Commissioner District 4
Honorable Emily Bonilla, Commissioner District 5
Honorable Mike Scott, Commissioner District 6

Orange County Government
201 South Rosalind Avenue
5th Floor
Orlando, FL 32801

**SUBJECT: Lake Pickett North, Sustanee Future Land Use Map Amendment
Transmittal to the Orange County Comprehensive Plan**

Dear Mayor and Commissioners:

On January 23, 2024, the Seminole County Board of County Commissioners discussed the proposed Sustanee future land use amendment and Conceptual Regulatory Plan (SCRP) under review by the Orange County Board of County Commissioners public hearing on January 23, 2024.

The discussion highlighted the concerns expressed in Seminole County's April 28, 2022, letter (attached) regarding the future land use amendment and SCRCP.

The Board directed staff to resend the April 2022 letter to the Orange County Board of County Commissioners and include in the transmittal of the future land use amendment, if transmitted.


Pursuant to Sec. 163.3184(3)(b)(1), F.S., if the Orange County Board of County Commissioners transmits the proposed amendment, Seminole County requests a copy of the transmittal package of the amendments and supporting data.

In summary, we respectfully request that the Orange County Board of Commissioners carefully consider the remaining concerns and additional considerations of the Seminole County Board of County Commissioners contained in the 2022 letter, which include timing of the fire station construction, stormwater management and transportation impacts.

Thank you for providing notice to Seminole County residents in this area of the proposal and for the several community meetings regarding development proposals on this property. We appreciate your staff keeping us apprised and for the opportunity to comment on the Sustanee development proposal.

If you have questions regarding any of the matters in this letter, please contact Rebecca Hammock, AICP, Development Services Director, at 407-665-7396, or by email at rhammock@seminolecountyfl.gov.

Sincerely,



Jay Zembower, Chairman
Seminole County Board of County Commissioners

Distribution (via email):

Byron Brooks, Orange County Administrator
Jon Weiss, Orange County Deputy County Administrator
Andres Salcedo, P.E., Acting Director, Orange County PEDS Department
Alberto Vargas, Planning Manager, Orange County Planning Division
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Maria Cahill, Orange County Planning Division
Tricia Johnson, Deputy County Manager, Seminole County
Meloney Koontz, Assistant County Manager, Seminole County
Kate Latorre, Seminole County Attorney
Rebecca Hammock, AICP, Seminole County Development Services Director
Seminole County BCC Records
Sean Froelich, Chief Operating Officer, Partner, Columnar Holdings, LLC

April 28, 2022

Honorable Jerry L. Demings, Orange County Mayor
Honorable Nicole H. Wilson, Commissioner District 1
Honorable Christine Moore, Commissioner District 2
Honorable Mayra Uribe, Commissioner District 3
Honorable Maribel Gomez Cordero, Commissioner District 4
Honorable Emily Bonilla, Commissioner District 5
Honorable Victoria P. Siplin, Commissioner District 6

Orange County Government
201 South Rosalind Avenue
5th Floor
Orlando, FL 32801

**SUBJECT: Lake Pickett North, Sustanee Future Land Use Map Amendment
Transmittal to the Orange County Comprehensive Plan**

Dear Mayor and Commissioners:

On March 22, 2020, the Seminole County Board of County Commissioners received an update from County staff on the status of the proposed 2021 Sustanee Conceptual Regulatory Plan (SCRP). As you may recall, Seminole County has been monitoring and providing comments and recommendations to Orange County Mayors and Boards of County Commissioners on the progress of this subject proposal in various forms beginning in 2015.

Regarding the subject property, Seminole County has historically been concerned about the following: (a) potential land use incompatibility and urbanization in Orange County adjacent to the Seminole County East Rural Area; (b) proposed extension of McCulloch Road and associated crossing of the Econlockhatchee River; (c) increased stormwater volume from development of this property and potential affects upon surface water quality; and (d) emergency response.

Ensuring the protection and preservation of the County's East Rural Area, the Seminole County Comprehensive Plan established the East Rural Area in 1991. The East Rural Area is where urban development is not anticipated and is characterized by: (a) agricultural uses; (b) large lot residential uses served primarily by on-site water wells and septic tanks; (c) rural roads; (d) limited commercial encroachments; (e) ample views of wooded areas and open spaces; and (f) occasional rural villages that provide the commercial and community support services required by the residents and rural businesses.

The Comprehensive Plan Future Land Use designation adjacent to Orange County along the area from the Econlockhatchee River east to CR 419, and beyond, is Rural-5 allowing for

single family residential development at a net density of one (1) dwelling unit per five (5) net buildable acres (*Various Rural Area Policies and Future Land Use Designations, Seminole County Comprehensive Plan*).

Seminole County voters approved a referendum that established a Rural Area and a Rural Boundary in the Home Rule Charter through a map and a legal description for inclusion into the Seminole County Comprehensive Plan, which is an example of Seminole County's efforts to protect and preserve the East Rural Area. The Future Land Use designations contained in the Seminole County Comprehensive Plan control the density and intensity of development. Additionally, the Board of County Commissioners must approve all changes to the Future Land Use designations regardless of whether any lands in the East Rural Area are located within a municipality.

The following is our understanding of the proposed project and our comments and requests for additional information and analysis.

Land Use Compatibility

The proposed Sustanee Conceptual Regulatory Plan (SCRP) will contain up to 2,400 single family residential dwelling units and a total developable density of 2.90 acres.

We understand the approximate residential density in the T2 (Rural Zone) adjacent to Seminole County would be no more than two (2) dwelling units per acre. If the density calculation includes the T1 (Natural/Wetland Transect Zone), the approximate residential would be 1.5 dwelling units per acre.

To ensure preservation and to enhance protection of lands located north of the Lake Pickett Study Area, including the East Rural Area of Seminole County, a minimum 300-foot buffer shall be provided along the County boundary line and designated as T1 (Natural/Wetland Transect Zone) on a Conceptual Regulating Plan. Such buffer can serve as a wildlife corridor (*Policy FLU 6.8.3, Transition, Orange County Comprehensive Plan*).

Transportation Management

We fully support the Applicant's intention not to create a vehicular bridge crossing of the Econlockhatchee River (an Outstanding Florida Water) that would extend McCulloch Road from its current terminus, east to intersect with Chuluota Road (CR 419). Extending McCulloch Road would increase pressure to urbanize Seminole County's East Rural Area and would be likely unfeasible due to cost; environmental constraints; and both public and private opposition.

In 2013, Seminole County removed the proposed widening of CR 419 (Chuluota Road) from the 2001 Infrastructure Tax Program. This decision was driven by citizen concern and the County's desire to further the goal of rural preservation in eastern Seminole County. In keeping with that effort, we request that Orange County ensure the transportation network for

the Sustanee project to be designed in a manner that discourages additional trips north onto CR 419 and to help maintain the rural character of the area. Seminole County respectfully requests the following additional analysis. The following considerations from Seminole County are based on the 2021 Sustanee Transportation Facility Analysis (TFA).

- The Sustanee Transportation Facility Analysis (TFA), prepared by Traffic and Mobility Consultants, does not include Chuluota Road (CR 419) north into Seminole County as part of the analysis. The TFA indicates that 15% of project traffic will travel into Seminole County. Seminole County requests an update to the TFA to determine the Level of Service (LOS) on Chuluota Road (CR 419) from the project entrance north to Lake Mills Road to account for the 15% of project trips.
- Section 4 Planned and Programmed Improvements (page 7) of the TFA, lists McCulloch Road (from Lockwood Boulevard to Old Lockwood Road/Tanner Road) as programmed to be widened to a 4-lane roadway. In Table 5, the existing volume to capacity is therefore incorrect, since 2-lanes are existing for the 2025 and 2045 Network and Volumes. The development will add approximately 9% of traffic to this roadway section, which is significant. Seminole County requests updates to this section of McCulloch Road to only 2-lanes and adjust the Level of Service and correct the 9% projects trips as needed. If there is a proposal to widen this segment of McCulloch Road, please coordinate with Seminole County for approval. In addition, we request an update to Table 5 existing volume capacity to only 2-lanes and please adjust the Level of Service and correct the 9% project trips as needed.
- Section 4 also lists Chuluota Road as planned to be widened to 4-lanes from Colonial Drive to the Seminole County Line. We request the 4-lane improvement end at the access point to the Sustanee project to provide for a better transition from the proposed 4-lane section down to the existing 2-lane section as Chuluota Road continues into Seminole County. We request the 4-lane improvement end at the access point to the project to provide for a better transition from the proposed 4-lane section down to the existing 2-lane section as Chuluota Road continues into Seminole County.
- The development proposes to add 1% of project trips onto Old Lockwood Road. Please analyze Old Lockwood Road, a Seminole County Roadway, for pre and post development traffic conditions, and analyze the signalized intersection of Old Lockwood Road and McCulloch to determine if development trips will affect this intersection.
- In the 2025 Existing Network, add McCulloch Road from SR 434 to Tanner Road as part of the analysis.
- Add Seminole County roadways, Chuluota Road and Old Lockwood Road to Table 5, 6, and 7 of the TFA.

- In Section 6.2 in the 2025 Conditions Analysis, McCulloch Road should be included as a deficient roadway in the list provided. The number of existing lanes listed should remain at only 2-lanes (Lockwood Boulevard to Old Lockwood Road).
- As an effected local government, we will continue to monitor and participate as needed in the North East Orange County Area Transportation Study (NEOCATS) (*FLU 6.9.5 East Orange Area-wide Transportation Study, Orange County Comprehensive Plan*).
- We request that Orange County coordinate with the Seminole County Public Works Department regarding transportation management.
- We also understand that the Applicant will dedicate the proposed trail extension to Orange County following trail construction. If a parking lot/trail head is constructed, we request that the lot include lighting to discourage potential non-trail uses in this remote area.

Stormwater and Surface Water Quality Management

Seminole County is responsible for complying with surface water quality degradation regardless of the source. With the northerly drainage pattern in the area, stormwater generated by the proposed development will affect surface water quality in Seminole County.

Stormwater and Surface Water Considerations from Seminole County

- Any upstream development should minimize its stormwater runoff and volume to decrease the potential for nutrient loading to Lake Pickett as well as the Econlockhatchee River (an Outstanding Florida Water) and surrounding wetlands.
- Portions of the Lake Pickett North development will discharge into an impaired water body. The Impaired Waters Rule, Chapter 62-303 of the Florida Administrative Code, may increase the requirements for pollution abatement treatment of stormwater as part of future approvals of related Basin Management Actions Plans currently in development by the State Department of Environmental Protection.
- Documentation should be provided to ensure that there is no contamination of the property.
- The proposed development will increase stormwater volume flowing from Orange County into the Lake Pickett sub basin in Seminole County, potentially resulting in flooding issues within Seminole County.
- The project is in the Big Econlockhatchee drainage basin and has the potential to affect several waterbodies, including Lake Pickett and the Big Econlockhatchee River.

- Seminole County requests the opportunity to participate in the stormwater management plan relating to this project.
- We request that Orange County coordinate with the Seminole County Public Works Department regarding stormwater and surface water quality management.

Emergency Response

The proposed Sustanee Conceptual Regulating Plan includes a fire station on the north side of Lake Pickett Road, west of Chuluota Road (CR 419).

Additional Emergency Response Considerations from Seminole County

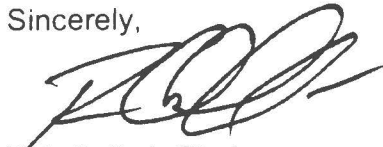
- In 2021, Seminole County provided a letter to Orange County stating that: (a) increased population in this area will likely result in increased 911 calls, increased traffic, and response times, and a decrease in unit availability; and (b) the area is covered with a network of Orange County and Seminole County Fire Stations and by a joint Seminole/Orange County Fire Station (FS 65) located on University of Central Florida property. Fire Station 65 is one of the busiest fire stations, so an increase in calls will affect this station and Seminole County's joint response partners.
- We request that Orange County coordinate with the Seminole County Fire Department regarding timing of construction of the proposed Fire Station.

In summary, we respectfully request that the Orange County Board of Commissioners carefully consider the concerns and additional considerations of the Seminole County Board of County Commissioners contained in this letter as to (a) protecting and preserving Seminole County's East Rural Area; (b) Land Use Compatibility; (c) Transportation Management; (d) Stormwater and Surface Water Quality; and (e) Emergency Response in reaching a decision to transmit the proposed Lake Pickett North, Sustanee Future Land Use Map Amendment to the Orange County Comprehensive Plan. If transmitted, we request that this letter be included in the transmittal package to the Florida Department of Economic Opportunity and other agencies.

Thank you for providing notice to Seminole County residents in this area of the proposal and for the several community meetings regarding development proposals on this property. We appreciate your staff keeping us apprised and for the opportunity to comment on the Sustanee development proposal.

If you have questions regarding any of the matters in this letter, please contact Rebecca Hammock, AICP, Development Services Director, at 407-665-7396, or by email at rhammock@seminolecountyfl.gov.

Sincerely,



Bob Dallari, Chairman
Seminole County Board of County Commissioners

BD/tm/tsb

Distribution (via email):

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