

November 10, 2016

Honorable Mayor Teresa Jacobs
Honorable S. Scott Boyd, District 1 Commissioner
Honorable Bryan Nelson, District 2 Commissioner
Honorable Pete Clarke, District 3 Commissioner
Honorable Jennifer Thompson, District 4 Commissioner
Honorable Ted Edwards, District 5 Commissioner
Honorable Victoria P. Siplin, District 6 Commissioner

Orange County Administration Center
201 South Rosalind Avenue
Orlando, Florida 32801-3547

Subject: Proposed Lake Pickett North (Sustany) Large Scale Future Land Use Map and Comprehensive Plan Amendment (Amendment 2016-1-A-5-1)

Dear Honorable Mayor and Commissioners:

As the Lake Pickett North (Sustany) Large Scale Future Land Use Map and Comprehensive Plan Amendment will be before you on November 15, 2016 for its adoption public hearing, Seminole County wishes to restate and extend its comments in opposition to this project.

For some years now, Seminole County has asked Orange County to engage in meaningful discussions that would lead to an Interlocal Agreement ("ILA") to coordinate development in this important sector of Central Florida. Our Counties have engaged in regional collaborations like "How Shall We Grow" to address such regional planning needs. In putting in place some of what we have learned through these collaborations, Seminole County has pursued a vision of limited density and development in the southeastern sector of our County; and this vision is confirmed by development that already exists and is likely to continue because of entrenched successful communities that have been established and the investments Seminole County and the State of Florida have made to create large and separated tracts of natural lands and forests in this sector. Hence, this sector of Seminole County is a unique place in our region and the compatibility of contiguous development in Orange County becomes a matter of great importance, not just to Seminole County, but to the region as a whole.

As you know, a more detailed record of our objections is contained in our formal objection that was sent to you on August 19, 2016. These objections have been made by the Board of County Commissioners of Seminole County in a series of letters to Mayor Jacobs and the Orange County Board of County Commissioners over the past nine (9) months (letters attached). In addition, in 2009, the Seminole County Board of County Commissioners sent a letter to then Mayor Crotty expressing concern with respect to the potential extension of McCulloch Road east to CR419 in conjunction with the proposed Rybolt Development of Regional Impact.

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Because our counties have no coordinated standards, we are left, once again, to participate in the divisive procedure of objecting to projects that are being proposed on an ad hoc basis, with no coordinated regional planning in place. Accordingly, Seminole County objects to the adoption of the proposed Sustany development approvals on a number of grounds as already described above, and as follows: (1) the incompatibility of this project to development trends in contiguous Seminole County, and the attendant lack of funded infrastructure within Orange County, all of which will have adverse effects upon the Seminole County and the proposed areas in Orange County that will be urbanized; (2) the impacts posed by development that generates pressure on the water quality of Lake Pickett, the Econlockhatchee River and the potential undermining of the Econlockhatchee River Wilderness Area as a habitat for the Black Bear and other species; and (3) the uncoordinated and unplanned eastern extension of McCulloch Road across the Econlockhatchee River, which is inconsistent with both the Seminole County and Orange County Comprehensive Plans and Orange County Code Section 15.443(1)(c).

Again, we respectfully request that Orange County specifically take note of the following recommendations before taking final action:

1. The proposed buffer between the development in Orange County and the East Rural Area in Seminole County must retain and absorb storm water generated from the development so it is compatible with and accommodates Seminole County's rural level of service for drainage in that area and the surface water quality of the Econlockhatchee River system. (*Seminole County Plan Policy FLU 11.12 'Methods of Managing Stormwater'*);
2. The proposed development cannot impair the existing Black Bear habitat of the Econlockhatchee River Protection Area such that it creates public safety and wildlife management issues. (*Seminole County Plan Conservation Element Goal*);
3. The proposed development pattern for Sustany and buffer between the development in Orange County and the East Rural Area in Seminole County must be compatible and sufficient to prevent the stimulation of urban sprawl that will impact the East Rural Area (*Seminole County Plan Objective FLU 11 'Preserve Rural Lifestyles in Seminole County' and Policy FLU 11.1 'Recognition of the East Rural Area' and Exhibit FLU: Compatible Transitional Land Uses*);
4. The Applicant should be required to demonstrate that either no additional vehicular crossing of the Econlockhatchee River will be a part of this proposal, or that any such vehicular crossing meets all the requirements of the Orange County Comprehensive Plan and Orange and Seminole County Land Development Codes, including the requirements that there is no feasible and prudent alternative, and that the crossing is clearly in the public interest (*Seminole County Plan Policy FLU 1.10 'Econlockhatchee River Basin Protection'*);
5. The hydrologic and nutrient study being conducted by ERD, Inc. should be completed prior to consideration of approval of the Lake Pickett North (Sustany) project;
6. The fire rescue and public safety concerns related to our first response agreement should be addressed prior to consideration of approval of the Lake Pickett North (Sustany) project;

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7. The impact to the Seminole County's Natural Lands property and future habitat management area must be ameliorated and addressed in a meaningful and sustainable way prior to consideration of approval of the Lake Pickett North (Sustany) project;
8. The proposed East Orange Area-wide Transportation Study should be completed prior to consideration of approval of the Lake Pickett North (Sustany) project; and
9. The County should conduct a community meeting to present the findings of the East Orange Area-wide Transportation Study.

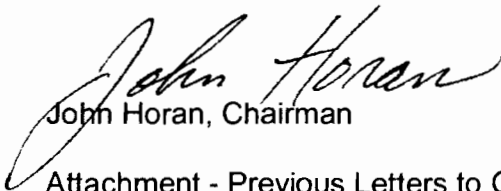
Please note that Orange County has pledged, through its involvement in the Central Florida Regional Compact, to work together with Seminole County as elected officials to address key regional issues in Central Florida and to support the guiding principles and theme of the Central Florida 50-Year Regional Growth Vision ("How Shall We Grow"). Consideration should be given to the consistency of the Sustany Development proposal with the Regional Growth Vision's principle of "Countryside". The decision to approve this proposal would affect the character and lifestyle of the citizens of Seminole County, which live in the County's East Rural Area, a historic agricultural area that is an important part of Seminole County's economic base and is permanently restricted to rural uses by both the Seminole County Home Rule Charter and the Seminole County Comprehensive Plan.

Once again, we greatly appreciate and acknowledge the effort of your staff in providing requested information, in keeping us apprised of the progress of this project, and for the opportunity to comment on this development proposal and related policies.

Thank you for your contemplation of these important issues that impact Seminole County and its residents and for your careful consideration of our recommendations. If you have any questions or comments regarding any matters contained in this letter, please contact my office, or the office of County Manager Nicole Guillet, AICP.

Sincerely,

BOARD OF COUNTY COMMISSIONERS



John Horan, Chairman

Attachment - Previous Letters to Orange County with Attachments

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Copy (via Email):

Jose Cantero, Chairman, Orange County Local Planning Agency
Ajit Lalchandani, Orange County Administrator
Alberto Vargas, Planning Manager, Orange County Planning Division
Nicole Guillet, AICP, County Manager
Bruce McMenemy, Deputy County Manager
Meloney Lung, Assistant County Manager
Tina Williamson, AICP, Development Services Director
Sean Froelich, Columnar Holdings, LLC
A. Bryant Applegate, County Attorney
Lynn Porter-Carlton, Deputy County Attorney
Paul H. Chipok, Assistant County Attorney
Erin Schaefer, Florida Department of Economic Opportunity

Attachment

Seminole County Letters

Attachment

Seminole County Letters

August 19, 2016

The Honorable Teresa Jacobs
Office of the Mayor
Orange County Administration Center
201 South Rosalind Avenue
Orlando, Florida 32801-3547

Subject: Proposed Lake Pickett North (Sustany) Large Scale Future Land Use Map and Comprehensive Plan Amendment (Amendment 2016-1-A-5-1)

Dear Mayor Jacobs:

Pursuant to Florida Statutes, Section 163.3184(3), the Seminole County Board of County Commissioners ("SCBCC") submits this letter and its attachments concerning the proposed Lake Pickett North (Sustany) Large Scale Future Land Use Map and Comprehensive Plan Amendment (the "Amendment"). This submission has also been provided for the record to the State Land Planning Agency (the "Agency"). The Orange County Board of County Commissioners ("OCBCC") approved transmittal of the Amendment to the Agency for review on July 12, 2016. The SCBCC received the transmittal, pursuant to its request, on July 27, 2016. The SCBCC opposed the motion to transmit and that opposition was noted in the record at the July 12, 2016 public hearing in Orange County.

As you know, the issues relating to the coordination of development along the borders of our Counties in their respective eastern sectors is a subject of long standing. A record of our concerns has been made by the SCBCC in a series of letters to the OCBCC. (See attached letters). Hence, the SCBCC continues to invite the OCBCC to move in the direction of a securing a meaningful and comprehensive Interlocal Agreement that can avoid these types of disputes in the future.

The proposed Amendment portends development that will negatively affect Seminole County's East Rural Area (the "Rural Area"). The Rural Area is an historic agricultural area and is a protected environment of rural, agricultural, natural and wilderness areas that contributes uniquely to Seminole County's quality of life and diverse economic base. The Rural Area is restricted to rural uses by both the Seminole County Home Rule Charter (the "SCHRC") and the Seminole County Comprehensive Plan ("SCCP"). Density within the Rural Area is limited to one (1) dwelling unit per five (5) net buildable acres adjacent to the proposed Amendment. It is restricted further by its inclusion in the Econlockhatchee River Protection Area, ("ERPA") which has been designated as an Outstanding Florida Water and provides habitat for keystone wildlife and the Florida Black Bear. In compliance with Florida Statutes, Section 163.3184(3), this submission shall focus on the impacts the Amendment will have on the Goals, Objectives, and Policies adopted within the SCCP. The SCBCC submits that allowing the Amendment will significantly impede the execution and attainment of many of the growth management outcomes the SCCP is intended to accomplish. The primary areas of concern include environmental protection, maintenance of rural character, development compatibility, and consistency in transportation management, public health and public safety management, and impacts on existing and future intergovernmental coordination efforts.

The Central Florida Regional Growth Vision ("How Shall We Grow?") was developed in 2007 and was funded from the State Department of Community Affairs. It is a shared vision created by citizens and elected officials of seven Central Florida counties, and is intended to guide development anticipated to accommodate the projected 7.2 million residents expected in this portion of the State by 2050. Participating governments signed a compact to support this Vision.

The Goal of the Future Land Use Element of SCCP is: "To implement the County's Future Land Use Plan within the context of the Central Florida Regional Growth Vision to achieve an appropriate balance between public and private interests in achieving the following Objectives and Policies." Seminole County reorganized the Objectives of its Future Land Use Element around the four key themes (the "4 Cs") of the Central Florida Regional Growth Vision, which are:

- A. Conservation (Establishing permanent 'green areas' for a conservation footprint)
- B. Centers (Promoting growth within current cities, towns and village centers, and encouraging new growth to locate within similar centers, to avoid stimulating a pattern of sprawl development)
- C. Countryside (Preserving the countryside/rural area outside of centers)
- D. Corridors (Connecting centers with a system of roads, rail and buses planned by county transportation planners cooperating on a regional basis)

The Amendment enables urban sprawl development, as defined in the SCCP, in a Countryside area that includes publicly owned State and local Conservation areas that have been purchased and are managed with public funds. They include wilderness areas managed by the Seminole County Natural Lands program, and other "Natural Lands." Because the Amendment does not support the "4 Cs" approach, it impedes the Future Land Use Objectives and Policies of Seminole County's Comprehensive Plan.

Particular Policies and Objectives of the Seminole County Future Land Use Element impeded by the proposed Amendment include:

Policy FLU 1.1 Environmentally Sensitive Lands, in which the County states it shall continue to regulate development and preserve environmentally sensitive areas such as wetlands through use of an overlay map and its regulations; however, the County cannot achieve this policy if impacts on environmentally sensitive areas occur as a result of the development permitted in the Lake Pickett area in adjacent Orange County.

Policy FLU, 1.9 Wekiva and Econlockhatchee River Protection, in which the County states it shall continue to regulate development along both of those rivers and their associated wetlands and tributaries, which are regionally significant, per the Central Florida Regional Growth Vision, to maintain rural density and character, minimize development impacts on water quality and quantity and restrict open space use to passive recreation; however, the County cannot achieve this policy if impacts on environmentally sensitive areas occur as a result of the development permitted in the Lake Pickett area in adjacent Orange County.

Policy FLU, 1.10 Econlockhatchee River Basin Protection, in which the County states that it will continue to regulate development consistent with the Econlockhatchee River Basin Study of 1990, through the use of the Seminole County Econlockhatchee River Protection Overlay contained within the Seminole County Land Development Code, and further identifies performance standards used for protection, including:

- Seminole County recognizes as a protection zone the main channels of the Big Econlockhatchee River and its tributaries; all property located within the first 1,100 feet landward of the stream's edge of the both the Big Econlockhatchee River and Little Econlockhatchee River as measured from stream's edge; all property located within 550 feet landward as measured from stream's edge of the tributaries and 50 feet of uplands property landward of the landward edge of the wetlands abutting the main channels of the River and its tributaries;
- Development activities shall not be permitted within the 550-foot development restriction zone of stream's edge except for creation of wetlands and passive recreational uses when such passive uses do not adversely affect aquatic and wetland dependent wildlife and other species;
- Forested habitat fragmentation shall be limited and there shall be no additional crossing by road, rail or utility corridors of lands located within the protection zone unless the following three conditions are met:
 - There is no feasible and prudent alternative to the proposed crossing;
 - All possible measures to minimize harm to the resources of the Econlockhatchee River Basin are implemented; and
 - The crossing supports an activity that is clearly in the public interest.

It is facially apparent that Seminole County will not achieve the goals of these policies if the development of the Lake Pickett area proceeds as permitted by the Amendment.

Objective FLU, 11 Preserve Rural Lifestyles in Seminole County, provides that the County shall continue to implement and enforce policies and programs designed to preserve and reinforce the positive qualities of the rural lifestyle presently enjoyed in East Seminole County, and ensure the rural lifestyle is available to future residents. However, Seminole County will be impeded in its ability to achieve this policy if the development of the Lake Pickett area proceeds as proposed by the developer and proposed to be permitted by Orange County, because the urban sprawl uses proposed in the Lake Pickett area are incompatible with the rural uses permitted in the East Rural area of Seminole County.

Policy FLU, 11.1 Recognition of East Rural Area the County, states that the County shall continue to enforce Land Development Code (LDC) provisions and implement existing land use strategies and those adopted in 2008 that were based on the Rural Character Plan of 2006 and that recognize East Seminole County as an area with specific rural character, rather than an area anticipated to be urbanized and that it is the policy of the County that rural areas require approaches to land use intensities and densities, rural roadway corridor protection, the provision of services and facilities, environmental protection and LDC enforcement consistent with the rural character of such areas. However, Seminole County will be impeded in its ability to achieve this policy if the development of the Lake Pickett area proceeds as proposed by the developer and proposed to be permitted by Orange County, because the urban sprawl uses proposed in the Lake Pickett area are incompatible with the rural uses permitted in the East Rural area of Seminole County and traffic studies conducted for the Lake Pickett development indicate that trips will be generated that will impact roads in Seminole County that are not programmed to serve that

number of trips, nor to achieve urban levels of service with respect to road drainage facilities and road widening.

Policy FLU 11.5, Roadway Corridor Overlay District for Major Roadways in East Seminole County, states that it shall continue to enforce Land Development Code provisions relating to the East Seminole County Scenic Corridor Overlay District Ordinance for major roads in East Seminole County, which shall extend 200 feet on each side of the road right-of-way, in order to regulate land development along major roadways to improve or protect the rural character of the area. The overlay corridor classification shall continue to regulate building, parking, tree and vegetation preservation and clearing setbacks unless specifically determined that a particular structure or activity that is located upon property assigned the classification uniquely re-enforces the rural character of the area. However, Seminole County will be impeded in its ability to achieve this policy if the development of the Lake Pickett area proceeds as proposed, because the urban sprawl uses proposed in the Lake Pickett area along Orange County roadways, particularly roadways divided in maintenance between Orange and Seminole Counties, will not similarly be governed by rural use restrictions, setbacks, tree preservation and clearing setbacks.

Policy FLU 11.14, Protection of Natural Resources, provides that Seminole County shall accomplish this policy by these actions, among others: protect wetland and floodprone areas in the Rural Area consistent with the provisions of the Future Land Use and Conservation Elements of this Plan and through the potential purchase of properties with funds deriving from the Natural Lands Program authorized by voter referendum in 1990 and 2000; and Protect the Econlockhatchee River in East Seminole County by regulating development within the River basin in accordance with *Policy FLU 1.9 Wekiva and Econlockhatchee River Protection* and *Policy FLU 1.10 Econlockhatchee River Basin Protection*; continuing to regulate development adjacent to the Econlockhatchee River in accordance with the Econlockhatchee River Protection Overlay Standards Classification, which implements *Policy FLU 1.10 Econlockhatchee River Basin Protection*; purchasing properties, when appropriate, with funds from the Natural Lands Program and other Federal, State, and regional programs; and enforcing provisions in the Land Development Code regarding additional bridge crossings of the Econlockhatchee River. However, Seminole County will be impeded in its ability to achieve this policy if the development of the Lake Pickett area proceeds as proposed, because the urban sprawl uses proposed in the Lake Pickett area which will drain into Seminole County will impact the quality of the natural waters.

Policy FLU 11.20, Protection of Character of East Rural Area Neighborhoods, providing that Seminole County shall seek partnerships and grant assistance in order to support the citizens of Geneva to provide infrastructure improvements that support and reinforce the historic character of the area; that Seminole County shall protect the character of the East Rural Area through the use of performance standards that require that public facilities serving the East Rural Area, including roadways, shall be designed in a context sensitive manner to ensure protection of the character of the East Rural Area and that development in the East Rural Area shall be guided by performance standards in the Land Development Code that limit densities in accordance with the Future Land Use designation; preserve natural and agrarian areas; allow limited commercial uses in village settings or as roadside stands on bona fide agricultural properties; provide use restrictions and tree protection standards; limit the extension of urban infrastructure; provide opportunities for nature-based recreation and protect the Geneva Freshwater Lens, watersheds, wetlands and sensitive upland systems. However, Seminole County will be impeded in its ability to achieve this policy if the development of the Lake Pickett area proceeds as proposed,

because the urban sprawl uses proposed in the Lake Pickett area will impact the character of the East Rural Area.

Policy CON 3.8, Econlockhatchee River Basin Protection, providing that Seminole County shall continue to regulate development consistent with the Seminole County Econlockhatchee River Basin Protection Ordinance to ensure its preservation as a recognized outstanding natural resource. The protections shall include: A 550 foot development restriction zone; provisions for density transfers outside of protection zones and critical habitats; protection of floodplain, wetlands, and rare upland habitat; historic and archaeological resource assessments; and minimal removal of native habitats. However, Seminole County will be impeded in its ability to achieve this policy if the development of the Lake Pickett area proceeds as proposed, because the urban sprawl uses proposed in the Lake Pickett area will impact the quality of the waters of the Econlockhatchee River basin, through surface water drainage (since surface water drains from Orange County to Seminole County), through disturbance of the native habitat to allow development to replace that habitat, and because the developer proposes a crossing of the river to accommodate the traffic to be generated by the proposed development.

Policy CON 3.9, Econlockhatchee River Outstanding Florida Water Designation, providing that Seminole County shall continue to manage and regulate development along the Econlockhatchee River to ensure its continued designation as an outstanding Florida Water Body and ensure that all development is consistent with the Econlockhatchee River Protection Overlay Standards Classification. However, Seminole County will be impeded in its ability to achieve this policy if the development of the Lake Pickett area proceeds as proposed, because the urban sprawl uses proposed in the Lake Pickett area will impact the quality of the waters of the Econlockhatchee River basin, through surface water drainage (since surface water drains from Orange County to Seminole County), through disturbance of the native habitat to allow development to replace that habitat, and because the developer proposes a crossing of the river to accommodate the traffic to be generated by the proposed development.

Policy CON 7.2, Special Area Protection, providing that Seminole County shall continue to enforce and apply all special federal, State, and local provisions that relate to protection of wetlands and their functions, including: the Wekiva River Protection Area as defined in Section 369.303(9), Florida Statutes, *Policy FLU 1.9 Wekiva and Econlockhatchee River Protection and Objective FLU 13 Protection of the Natural Resources of the Wekiva Study Area* and its policies, contained within the Seminole County Comprehensive Plan; the Wekiva Global Compliance Agreement; all provisions set forth in the Land Development Code of Seminole County relating to protection of wetlands and intended to implement the wetland protection policies of this Plan; the Econlockhatchee River Protection Ordinance; standards set forth in this Plan which protect the Rural Area; and all State and Water Management District wetland protection requirements.

However, Seminole County will be impeded in its ability to achieve this policy if the development of the Lake Pickett area proceeds as proposed, because the urban sprawl uses proposed in the Lake Pickett area will impact the quality of the waters of the Econlockhatchee River basin, through surface water drainage (since surface water drains from Orange County to Seminole County), through disturbance of the native habitat to allow development to replace that habitat, and because the developer proposes a crossing of the river to accommodate the traffic to be generated by the proposed development.

As with most large developments, traffic generated by the development can have a severe impact on area roadways. At buildout the Sustany project will generate over 16,000 daily trips just from the

residential uses. The Sustany project abuts Seminole County. Roads in the Rural Area will be impacted by a large portion of these trips. The impact of these trips conflict with numerous policies in the Seminole County comprehensive plan, specifically **Goal TRA 1** and its associated policies (see the attachment) that address consistency and compatibility between the envisioned development in the Future Land Use Element and associated policies in the Transportation Element. The intense development proposed by the Sustany project is not supported by the policies.

Other Transportation policies impacted by the proposed development include those under Objective TRA 2.2 that address accessibility to land uses to insure mobility while still discouraging urban sprawl. It is apparent that the Sustany project will place additional traffic on Seminole County Rural Area roadways. The above noted road crossing of the Econlockhatchee River to connect the project with McCullough Road conflicts with the policies associated with Objective 3.2 that address protection and coordination with natural resources and maintaining environmental quality. The construction of the bridge itself across the Econlockhatchee River will be disruptive to the sensitive ecosystem but the continuous traffic on the bridge will permanently damage the ecosystem.

Another Seminole County Comprehensive Plan Objective that will be impacted by this proposed Orange County amendment is **Objective IGC 1**, in which Seminole County states its intent to foster intergovernmental coordination with adjacent counties. The proposed amendment may have an immediate impact on the ongoing Interlocal Agreements between Orange and Seminole Counties dealing with management of Lake Pickett, and thus the ability of Seminole County to successfully foster intergovernmental coordination with Orange County.

An Interlocal Agreement between Seminole County and Orange County regarding Lake Pickett, a 762-acre lake located in south east Seminole and northeast Orange Counties in the Big Econlockhatchee River Watershed, was established to cooperatively manage the aquatic plants for this shared jurisdiction lake via an MSBU (Seminole) and an MSTU (Orange), and an Interlocal Agreement has been established for the cost share of a hydrologic and nutrient study being conducted by ERD, Inc. The completion of a detailed hydrologic and nutrient budget is of critical importance to this water body and watershed, in order to quantify current nutrient sources and protection/restoration strategies, as well as to establish a baseline for which potential impacts from future development can be measured. This study is not scheduled to be completed until April of 2017, and the approval of any additional development that would impact Lake Pickett is premature until the baseline is established by the study. The results of the study are also required to determine the scope and scale of a land use change in Orange County that could be deemed compatible with the SCCP. The Scope and the most recent progress report from ERD, Inc. is attached.

A second intergovernmental coordination issue arises from the potential transportation impacts of the Amendment. The Orange County staff has recommended a policy calling for an East Orange Area-wide Transportation Study to identify and analyze potential transportation projects to improve network connectivity and provide relief to the constrained transportation corridors. The proposed policy requires that Orange County coordinate with the Florida Department of Transportation, the Central Florida Expressway Authority, LYNX, the University of Central Florida, Central Florida Research Park and Seminole County in developing this Study. This study should be completed prior to approval of the Lake Pickett north amendment to (1) determine the impacts of connecting Sustany Way to McCulloch Road

and the future potential of extending McCulloch Road to County Road 419 (Chuluota Road); (2) evaluate the potential impacts to other regional transportation corridors and desired land use patterns in these portions of Seminole and Orange Counties (including the municipalities); (3) demonstrate that the additional bridge crossing of the Econlockhatchee River proposed by the applicant meets all requirements of, and is consistent with, both the SCCP and the OCCPS including metrics showing that there is no other feasible and prudent alternative, and that the crossing supports an activity that is clearly in the public interest, and (4) to determine the scope and scale of a land use change in Orange County that could be deemed compatible with the SCCP.

We note that previous traffic studies dealing with the proposed development identify potential traffic impacts on Seminole County Rural Area roads. This circumstance results in unanswered issues relative to the Goals, Objectives, and Policies of the SCCP. The first is the intergovernmental coordination issue: who will assume responsibility for addressing the impacts on Seminole County roads, given that the development will be located in Orange County, where Seminole County has no rights to request developer payments for safety and capacity impacts? Secondly, and equally critically: Seminole County's policies for roadways in its Rural Area do not anticipate roadway expansion, because the levels of service set for the rural roads are designed for a rural area. (See Policy TRA 1.1.3, attached.) How will this impact on Seminole County's Plan be addressed?

Another impact to the SCCP involves impacts to public safety service delivery. Although the SCCP does not have a Fire Rescue Plan Element, protection of the health and safety of the citizens of Seminole County is a predominate theme of the Seminole County Comprehensive Plan. The evaluation of Fire Rescue services is a part of Seminole County's development review process and **FLU Policy 7.2** addresses the need to engage in adequate extra-jurisdictional coordination on critical services. We currently enjoy a "first response" relationship between our two counties, and as such, must ensure adequate facilities and staffing for any development proposed for an area that is now predominantly rural in nature. Accordingly, we are also attaching comments from the County's Assistant Fire Marshal with respect to public safety concerns.

As noted, this Amendment will allow urban development on Conservation and Countryside lands in violation of the SCCP. Please take note that among these publicly purchased and maintained areas is 240 acres of natural lands on the west side of the Econlockhatchee River that would be impacted by the extension of McCulloch Road. It would necessitate the installation of taller, smaller opening fencing to protect wildlife and prevent vehicle collisions. This would in turn restrict wildlife movement and also have negative impacts via road noise and lighting on both wildlife and visitors. The crossing would no doubt have negative impacts to wildlife movement along the river riparian habitat zone. The policies addressing the Natural Lands are associated with **Objective FLU 1**.

Another issue in the management of both our property (Econlockhatchee River Wilderness Area) and the St. Johns River Water Management District's property (Sandhills) is the use of prescribed fire. We are already very restricted by wind direction within the Econlockhatchee River Wilderness Area for smoke management and the increased traffic and additional housing to the southeast will further restrict this important management tool. Comments from the St. Johns River Water Management District about these potential impacts are also attached.

With the passage of House Bill (HB) 7029, adequate school capacity is added to the County's concerns with the proposed residential development. As you know, HB 7029 will allow students to cross county lines to attend a school in a different school district than where they reside. Orange County has indicated the school district will not build a new school until the demand for a full school is in place. Parents in the Lake Pickett development could petition to have their children attend Seminole County schools until a school is built in their neighborhood, essentially consuming available student capacity in Seminole County Public Schools. This may result in potential development in Seminole County that is otherwise consistent with the Comprehensive Plan being denied. Policies impacted by this situation are associated with Objective PSF 1 of the Public School Facilities Element and are attached for reference.

In summary, Seminole County (1) objects to adverse effects upon the Seminole County East Rural Area posed by the proposed contiguous incompatible and uncoordinated urbanization; (2) objects to the impacts posed by development that generates pressure on the water quality of Lake Pickett, the Econlockhatchee River and the potential undermining of the Econlockhatchee River Wilderness Area as a habitat for the Black Bear and other species, and (3) objects to the impacts of the uncoordinated and unplanned eastern extension of McCulloch Road across the Econlockhatchee River, which is inconsistent with both the Seminole County and Orange County Comprehensive Plans.

Again, we respectfully request that Orange County carefully consider the concerns of Seminole County regarding the negative impacts upon the Seminole County Comprehensive Plan before taking final action on the Lake Pickett North (Sustany) development proposal, with the following recommendations:

1. The Applicant is to demonstrate that the proposed buffer between the development in Orange County and the East Rural Area in Seminole County will suffice to absorb storm water generated from the development so that it does not impact the East Rural Area in Seminole County (given Seminole County's rural level of service for drainage in that area), or the surface water quality of the Econlockhatchee River system (Seminole County Plan Policy FLU 11.12 'Methods of Managing Stormwater').
2. The Applicant is to demonstrate that the proposed development will not jeopardize the existing Black Bear habitat of the Econlockhatchee River Protection Area (Seminole County Plan Conservation Element Goal).
3. The Applicant is to demonstrate that the proposed development pattern and buffer between the development in Orange County and the East Rural Area in Seminole County is compatible and sufficient to prevent the stimulation of urban sprawl that will impact the East Rural Area (Seminole County Plan Objective FLU 11 'Preserve Rural Lifestyles in Seminole County' and Policy FLU 11.1 'Recognition of the East Rural Area' and *Exhibit FLU: Compatible Transitional Land Uses*);
4. The Applicant is to demonstrate that either no additional vehicular crossing of the Econlockhatchee River will be a part of this proposal, or that any such vehicular crossing meets all the requirements of, and is consistent with, the Orange County Comprehensive Plan, the Seminole County Comprehensive Plan, and the Orange County and Seminole County Land Development Codes, including the requirements that there is no feasible and prudent alternative, and that the crossing is clearly in the public interest (Seminole County Plan Policy FLU 1.10 'Econlockhatchee River Basin Protection');

BOARD OF COUNTY COMMISSIONERS

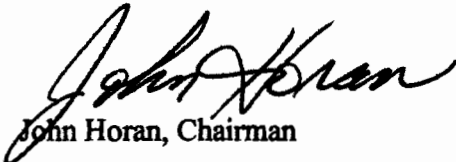


5. The hydrologic and nutrient study being conducted by ERD, Inc. is completed prior to approval of the Lake Pickett North (Sustany) project;
6. The fire rescue and public safety concerns related to our first response agreement are addressed prior to approval of the Lake Pickett North (Sustany) project;
7. The impact to the County's Natural Lands property and future habitat management area addressed prior to approval of the Lake Pickett North (Sustany) project;
8. The proposed East Orange Area-wide Transportation Study is to be completed prior to approval of the Lake Pickett North (Sustany) project; and
9. Conduct a community meeting to present the findings of the East Orange Area-wide Transportation Study.

Once again, we greatly appreciate and acknowledge the effort of your staff in providing requested information, in keeping us apprised of the progress of this project, and for the opportunity to comment on this development proposal and related policies.

If you have any questions or comments regarding any matters contained in this letter, please contact my office, or the office of County Manager Nicole Guillet, AICP.

Sincerely,
BOARD OF COUNTY COMMISSIONERS



John Horan, Chairman

Attachments

Copy (via Email):

Representative Jason Brodeur, District 28
Representative Scott Plakon, District 29
Representative Robert (Bob) Cortes, District 30
Mayor Dominic Persampiere, City of Oviedo
Jeff Prather, U.S. Army Corps of Engineers
Hugh Harling, East Central Florida Regional Planning Council
Harry Barley, MetroPlan Orlando
Paula Cobb, Deputy Secretary for Regulatory Programs, Department of Environmental Protection
Noranne Downs, Florida Department of Transportation, District 5 Secretary
Dr. Ann Shortelle, Executive Director, St. Johns River Water Management District
Cissy Proctor, Executive Director, Florida Department of Economic Opportunity
Jose Cantero, Chairman, Orange County Local Planning Agency
Ajit Lalchandani, Orange County Administrator

BOARD OF COUNTY COMMISSIONERS



Alberto Vargas, Planning Manager, Orange County Planning Division
Nicole Guillet, AICP, Seminole County Manager
Bruce McMenemy, Deputy Seminole County Manager
Meloney Lung, Assistant Seminole County Manager
Tina Williamson, AICP, Seminole County Development Services Director
A. Bryant Applegate, Seminole County Attorney
Lynn Porter-Carlton, Deputy Seminole County Attorney
Paul Chipok, Assistant Seminole County Attorney

List of Attachments:

- Previous Seminole County Letters to Orange County
- Seminole County Comprehensive Plan definition of Urban Sprawl and Plan Policies
- Seminole County Fire Department Memorandum
- Letter from the City of Oviedo dated May 2, 2016
- Letter from the City of Oviedo dated August 15, 2016
- St. Johns River Water Management District email correspondence
- ERD, Inc. Scope of Services and most recent Progress Report

BOARD OF COUNTY COMMISSIONERS



April 19, 2016

Honorable Mayor Teresa Jacobs
Honorable S. Scott Boyd, District 1 Commissioner
Honorable Bryan Nelson, District 2 Commissioner
Honorable Pete Clarke, District 3 Commissioner
Honorable Jennifer Thompson, District 4 Commissioner
Honorable Ted Edwards, District 5 Commissioner
Honorable Victoria P. Siplin, District 6 Commissioner

Orange County Government
201 South Rosalind Avenue
Fifth Floor
Orlando, Florida 32801

Subject: Sustany (aka Lake Pickett North) Development Proposal

Dear Honorable Mayor and Commissioners:

We strongly reaffirm Seminole County's objections concerning (1) the uncoordinated and unplanned urbanization that is advancing in East Orange County contiguous to Seminole County's East Rural Area ("ERA"); and (2) the proposed eastern extension of McCulloch Road across the Econlockhatchee River ("Econ River").

Since 2009, Seminole County has continuously expressed its objections concerning development proposals for certain properties along the Orange/Seminole County border. Seminole County's most significant objections have been clear. They are (1) the adverse effects on the ERA posed by the contiguous incompatible and uncoordinated urbanization in Orange County; (2) transportation capacity, connectivity and mobility deficits posed by increased density and the extension of McCulloch Road across the Econ River; and (3) degradation to the surface water quality within Seminole County.¹

Of particular concern is the proposed development known as Sustany (a/k/a Lake Pickett North).² The Orange County Board of County Commissioners is scheduled to consider comprehensive plan amendments and/or associated changes to land development policies that relate to Sustany in June, 2016. We learned recently that this proposed development also includes the above noted connection to McCulloch Road east of the Econ River. Seminole County's position on this development remains clear and consistent. As noted above, Seminole County (1) objects to the adverse effects to the ERA posed by this contiguous incompatible and uncoordinated urbanization; and (2) restates its objections concerning the deleterious effects

¹ Seminole County's letters on these issues dated March 10, 2015 and June 23, 2015 are attached for your reference.

² In 2009 this property was known as the Ryboldt DRI. Please refer to the attached proposed regulatory plan for Lake Pickett North dated February 2016).

posed by an uncoordinated and unplanned eastern extension of McCulloch Road across the Econ River. A record of these objections was made most recently at our Seminole County Board of County Commissioners meeting on April 12, 2016, wherein the Board authorized the formal posting of these objections.

Until recently, the Applicant for the Sustany development has not proposed a connection to McCulloch Road across the Econ River due to (1) environmental constraints, (2) costs, and (3) opposition to a river crossing associated with previous project proposals by others. However, the March 2016 draft transportation facility analysis for the proposed development states that the Applicant is now proposing to cross the Econ River, an Outstanding Florida Water, pursuant to Chapter 62-302.700, Florida Administrative Code.

In regards to any additional crossings of the Econ River, the City of Oviedo, Seminole County, and Orange County Land Developments Codes include language prohibiting additional crossings unless (1) there is no feasible and prudent alternative to the proposed crossing, and (2) that the crossing supports an activity that is clearly in the public interest [*Article XI.—Econlockhatchee River Protection, Sec. 15.443(1)(c), Orange County Land Development Code*]. The Orange County Comprehensive Plan also includes this language [*Future Land Use Element Policy 5.1.3(13), Orange County Comprehensive Plan*].

We respectfully suggest that Orange County take note of its own proposed text amendments for the proposed Lake Pickett Future Land Use designation. Orange County staff is recommending a policy calling for an East Orange Area-wide Transportation Study to identify and analyze potential transportation projects to improve network connectivity and provide relief to constrained transportation corridors. The proposed policy requires that Orange County coordinate with the Florida Department of Transportation, the Central Florida Expressway Authority, LYNX, the University of Central Florida, Central Florida Research Park, and Seminole County in developing this Study (*Future Land Use Element Policy 6.9.5 East Orange Area-wide Transportation Study*).

This study should be completed prior to approval of the Lake Pickett North Regulatory Plan to (1) determine the impacts from connecting Sustany Way to McCulloch Road, and the future potential of extending McCulloch Road to CR 419 (Chuluota Road); (2) evaluate the potential impacts to other regional transportation corridors in this area of Orange and Seminole Counties, including municipalities; and (3) demonstrate that an additional bridge crossing of the Econ River meets all the requirements of the Orange County Comprehensive Plan and Land Development Code. It is interesting to note that this type of intergovernmental coordination is consistent with recent requests made by Orange County to Osceola County concerning proposed developments along your common border.

Recommendation

We respectfully request that the Orange County Board of County Commissioners and the Orange County Planning and Zoning Commission/Local Planning Agency, address the objections of the Seminole County Board of County Commissioners before taking action on the Lake Pickett North development proposal, and offer the following recommendations:

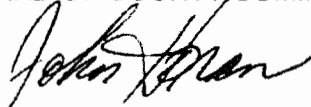
1. Require the Applicant to demonstrate that the proposed crossing of the Econ River meets all the requirements of the Orange County Comprehensive Plan and Land Development Code;
2. Require that the proposed East Orange Area-wide Transportation Study be completed prior to consideration of the Sustany project;
3. Conduct a community meeting to present the findings of the East Orange Area-wide Transportation Study; and

4. Coordinate and collaborate with Seminole County to reach an Interlocal Agreement that addresses our mutual needs.

We appreciate your staff keeping us apprised and for the opportunity to comment on the Sustany development proposal and related policies.

If you have questions regarding any of the matters in this letter, please contact my office.

Sincerely,
BOARD OF COUNTY COMMISSIONERS


John Horan, Chairman
JH:tm

Distribution (email):

Representative Jason Brodeur, District 28
Representative Scott Plakon, District 29
Representative Robert (Bob) Cortes, District 30
Mayor Buddy Dyer, City of Orlando
Mayor Dominic Persampiere, City of Oviedo
Jeff Prather, Senior Project Manager, U.S. Army Corps of Engineers Regulatory
Hugh Harling, East Central Florida Regional Planning Council
Harry Barley, MetroPlan Orlando
Paula Cobb, Deputy Secretary for Regulatory Programs, Florida Department of Environmental Protection
Noranne Downs, Florida Department of Transportation, District 5 Secretary
Dr. Ann Shortelle, Executive Director, St. Johns River Water Management District
Cissy Proctor, Executive Director, Florida Department of Economic Opportunity
Jose Cantero, Chairman, Orange County Local Planning Agency
Ajit Lalchandani, Orange County Administrator
Alberto Vargas, Planning Manager, Orange County Planning Division
Nicole Guillet, AICP, County Manager
Bruce McMenemy, Deputy County Manager
Meloney Lung, Assistant County Manager
Tina Williamson, AICP, Development Services Director
Dwight Saathoff, Principal, American Land Investments of Central Florida, LLC
Sean Froelich, Columnar Holdings, LLC

March 10, 2015

The Honorable Teresa Jacobs, Mayor
Orange County Government
201 South Rosalind Ave
Fifth Floor
Orlando, FL 32801

Subject: Development Proposals In East Orange County Adjacent to Seminole County

Dear Mayor Jacobs:

The Seminole County Board of County Commissioners (BCC) received an update on the status of the Lake Pickett North and Lake Pickett South development proposals at our BCC meeting. This information prompted significant discussion, especially with regard to the proposed Lake Pickett North project. On behalf of the BCC, I would like to express our collective concerns regarding the potential impacts of the proposed Lake Pickett North development on adjacent properties within Seminole County, and respectfully request that you, your colleagues on the Orange County Commission, and the Orange County Planning and Zoning Commission/Local Planning Agency, carefully consider the following concerns, comments, and recommendations before taking action on these two development proposals.

Central Florida Regional Growth Vision (How Shall We Grow)

As you will recall from your involvement in the "How Shall We Grow" effort, the Central Florida Joint Policy Framework Committee created the Central Florida Regional Compact. This Compact, incorporating the guiding principles and themes of this Regional Growth Vision (How Shall We Grow), represents a pledge that elected officials would work together to address the key regional issues facing Central Florida. In creating this 50-year shared Regional Growth Vision, members of the Framework Committee recognized that "The decisions about development made by individual communities can have impacts far beyond their boundaries."

Please consider the pledge Orange County made through the Central Florida Regional Compact to work together as elected officials to address the key regional issues facing Central Florida, and to support the guiding principles and themes of the Central Florida 50-year Regional Growth Vision (How Shall We Grow). Consideration should be given to the consistency of these development proposals with the Regional Growth Vision's principle of "Countryside" - *Preserve the countryside areas beyond urban center* and "Centers" - *Promote growth in current urban areas to counter the current pattern of sprawling development*. The decision to approve one or both of these proposals may affect the character and lifestyle of citizens in Seminole and Orange Counties, and may precipitate future development activities farther east of the Econlockhatchee River.

Mayor Teresa Jacobs
March 10, 2015
Page Two

Seminole County East Rural Area

The Lake Pickett North proposal is directly adjacent to the Seminole County East Rural Area, which was established in 1991. Seminole County subsequently adopted the Regional Growth Vision's theme of "Countryside" into the County's Comprehensive Plan in recognition of the importance of the Regional Growth Vision as an additional tool to protect the County's East Rural Area from urbanization. The intent of the "Countryside" theme is to preserve the rural areas beyond urban centers, in an effort to preserve open space, recreational areas, farmland, water resources, and regionally significant natural areas. The importance of protecting the character of the East Rural Area was reinforced through a citizen-initiated referendum in 2004, formally recognizing and protecting the East Rural Area in Seminole County's Home Rule Charter. In 2006, the BCC accepted a Rural Character Plan that recognizes East Seminole County as an area with specific rural character that is expected to be maintained, rather than an area anticipated to be urbanized.

Properties in Seminole County's East Rural Area are designated for a net residential density of no more than one (1) dwelling unit per five (5) net buildable acres in the Seminole County Comprehensive Plan. Our Comprehensive Plan also includes policies and objectives intended to preserve and reinforce the positive qualities of the rural lifestyle presently enjoyed in East Seminole County. It is our understanding that the Lake Pickett North development proposal involves residential uses only, ranging from 1,600 to 2,000 single family dwelling units on 1,436 acres, and will involve the use of transect zones to transition densities from north to south. We ask that the Orange County Board of County Commissioners require any proposed development adjacent to Seminole County to include transitional land uses consistent with the one (1) dwelling unit per five (5) net buildable acres land use pattern and our Comprehensive Plan policies intended to protect the rural character of the East Rural Area.

With regard to the Lake Pickett South development, we understand that this proposal, located south of Lake Pickett Road is intended as a mixed use development with 2,961 dwelling units and 237,000 square feet of nonresidential uses on 1,237 acres, and will also involve the use of transect zones to transition densities from north to south. Development south of Lake Pickett Road is not anticipated to significantly impact the County's East Rural Area, due to the distance from the Seminole County border

Transportation Issues

The Econlockhatchee River, designated by the State of Florida as an Outstanding Florida Water Body, is protected by both Seminole County and Orange County through development regulations establishing that a bridge crossing of the Econlockhatchee River should only occur if it is demonstrated to be clearly within the public interest. We understand that the Developer of Lake Pickett North is not planning to seek a connection from the proposed development across the River to McCulloch Road. We are encouraged to hear this, as we believe extending McCulloch Road across the River could lead to extension of the roadway east to CR 419 (Chuluota Road) in the future, thus encouraging further urbanization and potentially damaging the historic rural character and environmental assets of this portion of

Mayor Teresa Jacobs
March 10, 2015
Page Three

both Seminole and Orange Counties. In light of the developer's commitment to not seek a connection to McCulloch Road, we request a revision of the proposed conceptual plan to remove the northwest extension of the property toward the Econlockhatchee River to clarify that there is no intention to cross the river.

Furthermore, we recently provided notice to Orange County that we removed the proposed widening of CR 419 (Chuluota Road) in Seminole County from the 2001 Infrastructure Tax Program in 2013. This decision was driven by our desire to further our goal of rural preservation in eastern Seminole County. In keeping with that effort, we request that Orange County ensures that the transportation network for the Lake Pickett North project be designed in a manner to discourage additional trips north on CR 419 and to help maintain the rural character of the area.

It appears that all project trips associated with the Lake Pickett South project will be directed south to SR 50 and that no direct access is proposed to CR 419. If this is the case, we have little concern relative to the traffic impacts from this project.

Stormwater

Seminole County is required to comply with surface water quality degradation regulations, regardless of the source. With the northerly drainage pattern in this area, it is expected that storm water flow generated by the Lake Pickett North proposal will affect the surface water quality within Seminole County. This causes great concern to me and my colleagues on the Commission. We are also concerned that the proposed development will increase the storm water volume flowing from Orange County into the Lake Pickett sub-basin in Seminole County, potentially resulting not only in water quality degradation, but also flooding issues within Seminole County.

Seminole County and Orange County are working together on the implementation of a detailed nutrient study and hydrologic analysis for the Lake Pickett drainage basin, which is being cooperatively funded by both jurisdictions. The results of this study will provide a comprehensive baseline assessment of the current water quality and quantity conditions. To ensure that this study accomplishes its intended purposes, we request that the Lake Pickett North developer establish monitoring sites in Seminole County to reflect any potential impacts from the development. We would also appreciate the opportunity to participate in reviewing the storm water management plan relating to this proposal.

We know through past experience, that you and your fellow Board of County Commissioners are sensitive to regional issues that may affect neighboring jurisdictions. In 2009, Seminole County submitted a similar letter to then Mayor Richard Crotty regarding the proposed Rybolt Park Development of Regional Impact, expressing many of the same concerns contained herein. Since then, there have been other proposals for development of the subject properties resulting in numerous meetings with area residents from Seminole and Orange Counties.

Mayor Teresa Jacobs
March 10, 2015
Page Four

Orange County has always been receptive to our points of view, and has consistently responded in a responsible and thoughtful manner. Please accept our sincere appreciation for your on-going consideration of the concerns of Seminole County and its residents.

If you have questions regarding any of the matters in this letter, please feel free to contact me or Tina Williamson, AICP, Development Services Director. You may reach Ms. Williamson at 407-665-7397 or via email at twilliamson@seminolecountyfl.gov.

Sincerely,

BOARD OF COUNTY COMMISSIONERS

A handwritten signature in cursive script that reads "Brenda Carey". The signature is written in black ink and is positioned above the printed name of the signatory.

Brenda Carey, Chairman

c: Orange County Board of County Commissioners
Paul Wean, ~~Vice Chairman~~, Orange County Planning and Zoning
Commission/Local Planning Agency
Ajit Lalchandani, County Administrator, Orange County
Alberto Vargas, Planning Manager, Orange County Planning Division
Nicole Guillet, AICP, County Manager, Seminole County
Bruce McMenemy, Deputy County Manager, Seminole County
Meloney Lung, Assistant County Manager, Seminole County
Tina Williamson, AICP, Development Services Director, Seminole County
Dwight Saathoff, Principal, American Land Investments of Central Florida, LLC
Sean Froelich, Columnar Holdings, LLC

June 23, 2015

The Honorable Teresa Jacobs, Mayor
Orange County Government
201 South Rosalind Ave, Fifth Floor
Orlando, FL 32801

Subject: Proposed Lake Pickett Projects in East Orange County Adjacent to Seminole County

Dear Mayor Jacobs:

On March 10, 2015, I wrote to you on behalf of the Seminole County Board of County Commissioners (Board) to express our concerns regarding the proposed Lake Pickett developments, especially the North Lake Pickett Project (see enclosed letter). These concerns included potential negative impacts to the County's East Rural Area, the associated transportation system, stormwater quality, and Econlockhatchee River (Econ River).

Today, the Board received an update on the status of the Lake Pickett development proposals. Based on that update, the concerns we expressed in my March 10th letter to you remain unchanged. Additionally, the recommendation that the Orange County Local Planning Agency (LPA) issued at its meeting on June 18, 2015 suggesting that the Orange County Board of County Commissioners (BCC) direct staff to look into the possibility of extending McCulloch Road across the Econ River as an alternative to address the traffic issues in the area is especially troubling to us. For many years, the prospect of crossing the Econ River has been an environmental concern for Seminole County. In 2009, the Board provided a letter to then Mayor Crotty expressing our concern with respect to the potential extension of McCulloch Road east to CR 419 in conjunction with the proposed Rybolt Park Development of Regional Impact (see enclosed letter).

As this issue comes before you at your July 28, 2015 public hearing, we encourage you and your colleagues to remain mindful of all the potential negative effects that these developments may have on the citizens of Seminole County. The consideration that you give regarding the extra-jurisdictional impacts of these projects is appropriate as it appears they would have been subject to Development of Regional Impact review prior to the statutory changes.

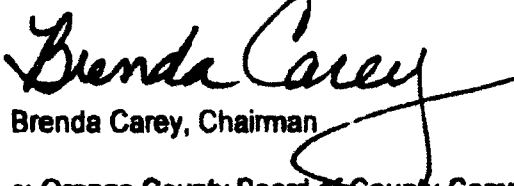
Mayor Teresa Jacobs
June 23, 2015
Page Two

Please accept our sincere appreciation for your consideration of these important issues that will affect Seminole County, its residents and future generations.

If you have questions regarding the matters in this letter, please contact Tina Williamson, AICP, Development Services Director. You may reach Mrs. Williamson at 407-665-7397, or via email at twilliamson@seminolecountyfl.gov.

Sincerely,

BOARD OF COUNTY COMMISSIONERS


Brenda Carey, Chairman

c: Orange County Board of County Commissioners
Ajit Lalchandani, Orange County Administrator
Alberto Vargas, Planning Manager, Orange County Planning Division
Nicole Guillet, AICP, County Manager
Bruce McMenemy, Deputy County Manager
Meloney Lung, Assistant County Manager
Dwight Saathoff, Principal, Project Finance & Development, LLC
Sean Froelich, Columnar Holdings, LLC

	GROUP MEMBERS	DATE PERFORMED	INSTRUCTOR'S SIGN
1-1	176.1	180.1	8
2-1	180.1	184.1	76.1
2-2	217.1	22.1	17.1
3-1	21.1	22.1	2
3-2	21.1	10.1	2
4-1	21.1	10.1	1.000

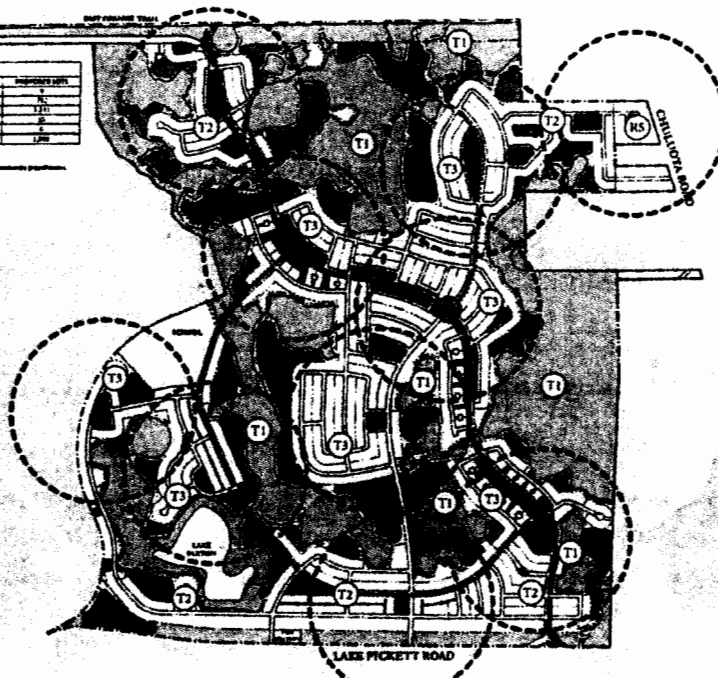
1. Zgodovina naša je zanimljiva, ali najvažnije nam je, da se naučimo iz nje poučiti, posebno iz prošlosti.
2. Zgodovina nam pomaže da razumemo svet oko nas.

☐ T3
☐ T2
☒ T1
☐ RS
☐ APF

5 MINUTE WALK
NEIGHBORHOOD BOUNDARY
EAST ORANGE TRAIL
(BY ORANGE COUNTY)
||||| TRAIL/SIDEWALK
- NATURE TRAIL

PARKS

STORMWATER PONDS



Sustany

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February 29, 2016

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Lakeland, Florida 33805 813 937 7790

POULOS & BENNETT

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allowable urban land uses. In Seminole County, this shall include all areas not within the Charter Rural Area.

URBAN SPRAWL

Urban sprawl means a development pattern characterized by low density, automobile dependent development with either a single use or multiple uses that are not functionally related, requiring extension of public facilities and services in an inefficient manner and failing to provide a clear separation between urban and rural uses. The future land use element and any amendment to the future land use element shall discourage the proliferation of urban sprawl. The primary indicators that a plan or plan amendment does not discourage the proliferation of urban sprawl are:

- (I) Promotes, allows, or designates for development substantial areas of the jurisdiction to develop as low-intensity, low-density, or single-use development or uses.
 - (II) Promotes, allows, or designates significant amounts of urban development to occur in rural areas at substantial distances from existing urban areas while not using undeveloped lands that are available and suitable for development.
 - (III) Promotes, allows, or designates urban development in radial, strip, isolated, or ribbon patterns generally emanating from existing urban developments.
 - (IV) Fails to adequately protect and conserve natural resources, such as wetlands, floodplains, native vegetation, environmentally sensitive areas, natural groundwater aquifer recharge areas, lakes, rivers, shorelines, beaches, bays, estuarine systems, and other significant natural systems.
 - (V) Fails to adequately protect adjacent agricultural areas and activities, including silviculture, active agricultural and silvicultural activities, passive agricultural activities, and dormant, unique, and prime farmlands and soils.
 - (VI) Fails to maximize use of existing public facilities and services.
 - (VII) Fails to maximize use of future public facilities and services.
 - (VIII) Allows for land use patterns or timing which disproportionately increase the cost in time, money, and energy of providing and maintaining facilities and services, including roads, potable water, sanitary sewer, stormwater management, law enforcement, education, health care, fire and emergency response, and general government.
 - (IX) Fails to provide a clear separation between rural and urban uses.
 - (X) Discourages or inhibits infill development or the redevelopment of existing neighborhoods and communities.
 - (XI) Fails to encourage a functional mix of uses.
 - (XII) Results in poor accessibility among linked or related land uses.
 - (XIII) Results in the loss of significant amounts of functional open space.
- (Sources: Section 163.3164 (51) and Section 163.3177 (6)(a).9.a., Florida Statutes)

**Goals, Objectives, & Policies of the Seminole County Comprehensive Plan
Impacted by the
Proposed Amendment and Development Proposal
to the Orange County Comprehensive Plan
for Lake Pickett North/Sustany**

Future Land Use Element

OBJECTIVE FLU 1 NATURAL, HISTORIC AND ARCHAEOLOGICAL RESOURCES

Pursuant to Article II, Section 7 of the Constitution of the State of Florida and the Central Florida Regional Growth Vision, the County shall ensure that natural, historic and archaeological resources are protected for the enjoyment of all citizens through provisions of the Land Development Code of Seminole County (the "Land Development Code") and The County Comprehensive Plan (the "Plan") policies.

Policy FLU 1.1 Environmentally Sensitive Lands

The County shall continue to regulate development and preserve environmentally sensitive areas by means of the Environmentally Sensitive Lands Overlay Area and associated provisions of the Land Development Code where soils, topography, wetlands, floodplains, land use, and other constraints exist. The Environmentally Sensitive Lands Overlay Area shall identify floodprone lands (as identified by the National Flood Insurance Program) and the location of major wetlands defined by the St. Johns River Water Management District.

Policy FLU 1.2 Floodplain Protection

The County shall continue to implement the Environmentally Sensitive Lands Overlay Area through the regulation that supports the National Flood Insurance Program by:

- A Restricting uses that are dangerous to health, safety and property, and minimize public and private losses due to flood conditions;
- B Prohibiting land filling and grade changes where such activity will cause erosion or inhibit flood waters;
- C Requiring development to comply with the requirements and rules of the National Flood Insurance Program and Florida Department of Health; and
- D Requiring all subdivisions and site plans to maintain pre-development run off characteristics, provide compensating storage, comply with wetland regulations, and dedicate post-development floodprone and wetland areas to the County as a conservation easement.

Policy FLU 1.3 Wetlands Protection

The County shall implement the Environmentally Sensitive Lands Overlay Area through the regulation of development consistent with *Policy CON 7.4 Wetland Regulation - Buffers, Performance Standards and Compatibility*, which includes the following:

- A Requires a 15 foot minimum, 25 foot average wetland buffer in areas outside of the Wekiva River Protection Area and Econlockhatchee River Protection Area.
- B Requires adherence to performance standards for uses such as boardwalks, docks and gazebos that may directly impact a locally significant wetland physically.
- C Limits disruption of locally significant wetlands to projects that involve construction of, or improvement of, facilities that benefit the general public.;

- D Requires dedication to the County of all post-development wetlands as conservation easements.

Policy FLU 1.5 Natural/Environmental Lands Acquisition and Management Program

The County shall continue to manage the more than 6,500 acres of Natural Lands acquired through the 1990 Natural Lands Bond Referendum and November 2000 Natural Lands – Completing the Connection Bond Referendum for the acquisition of significant natural habitats, open space areas and greenways. These environmental assets, which include seven Wilderness Areas and One Preserve, are open to the public for environmental education and passive recreation. The lands were designated as “Preservation/Managed Lands” on the Future Land Use Plan Map in 2008 in response to the 2006 Evaluation and Appraisal (EAR) Major Issue finding of a need to ensure that the County Comprehensive Plan is more accessible and understandable. The Seminole County Natural Lands Program is consistent with and supports the implementation of the ongoing “Green Print” process undertaken by the Congress of Regional Leaders, as a part of the Central Florida Regional Growth Vision.

Policy FLU 1.9 Wekiva and Econlockhatchee River Protection

- A The County shall continue to regulate development of land along the Wekiva River and the Econlockhatchee River, and their associated wetlands and tributaries, which are regionally significant natural areas in need of preservation, per the Central Florida Regional Growth Vision, to implement Protection Zone policies and regulations regarding maintaining rural density and character in the aggregate, development setbacks, concentrating permitted development farthest from surface waters and wetlands where permitted, minimizing development impacts on water quantity and quality, and restricting open space areas to passive recreational uses.

Regardless of the future land use designation or zoning classification assigned to any parcel of property located within the Wekiva River Protection Area as defined in Section 369.303(9), Florida Statutes, no development may be approved upon parcels so located unless the proposed development conforms to the provisions of the Wekiva River Protection Act (Part II, Chapter 369, Florida Statutes), and the provisions of this Plan adopted to conform to said Act. See *Objectives FLU 12 Preservation of the Rural Character and Natural Resources of the Wekiva River Protection Area and FLU 13 Protection of the Natural Resource of the Wekiva Study Area* for additional policies regarding the goals of the Wekiva River Protection Area.

Notwithstanding any other provision of this Plan, middle schools and high schools shall not be permitted on property located within the Wekiva River Protection Area except for 8.7 acres owned by the Seminole County School Board prior to October 26, 1999, which is located in the East Lake Sylvan Transitional Area, which is depicted in *Exhibit FLU: East Lake Sylvan Transitional Area/School Site*.

- B The County shall enforce all clearing and building setbacks or protection/buffer zones and areas along the Wekiva River, and Econlockhatchee River and such other water bodies as imposed by rules of the St. Johns River Water Management District, any State agency or as may be otherwise imposed by law, provided that a minimum 200 foot clearing and building setback shall be set along the Wekiva River, as measured from the ordinary high water elevation or the landward limit of established conservation areas, to serve as a scenic and environmental buffer to maintain the status quo of the natural environment and prevent public harms.

- C As additional protection to groundwater and surface water, development activity within the Wekiva Protection Area, including the placing or depositing of fill within wetlands and the one hundred year floodplain as identified by Federal Emergency Management Agency, shall be prohibited, except in cases of overriding public interest.

Policy FLU 1.10 Econlockhatchee River Basin Protection

The County shall continue to regulate development consistent with the Econlockhatchee River Basin Study of 1990, which serves as the basis for Policy FLU 1.10 and the Seminole County Econlockhatchee River Protection Overlay within the County Land Development Code (LDC). The Performance Standards contained in Policy FLU 1.10 are intended to ensure the preservation of the Econlockhatchee River as a recognized outstanding natural resource and regionally significant natural area. Minimum ordinance provisions necessary to ensure protection of the Econlockhatchee River Basin shall include:

- A The recognition of the "Econlockhatchee River Corridor Protection Zone" (Zone), which includes: the main channels of the Big Econlockhatchee River and its tributaries contained within the area shown as the "Econ Protection Area" as depicted on *Exhibit FLU: Resource Protection Areas* and depicted on "Exhibit A" within the Seminole County Econlockhatchee River Protection Overlay of the LDC; all property located within the first 1,100 feet landward as measured from the stream's edge of the main channels of the Big Econlockhatchee River and Little Econlockhatchee River within the aforementioned "Econ Protection Area"; all property located within 550 feet landward as measured from the stream's edge of the tributaries of the Big Econlockhatchee River within the aforementioned "Econ Protection Area" 50 feet of uplands property that is landward of the landward edge of the wetlands abutting the main channels of the Big Econlockhatchee River and its tributaries within the aforementioned "Econ Protection Area".
- B The term "stream's edge" means the waterward extent of the forested wetlands abutting the Big Econlockhatchee River or its tributaries. In the absence of forested wetlands abutting the River or tributary, "stream's edge" means either the mean annual surface water elevation of the stream, or, in the absence of hydrologic data, the landward extent of wetland herbaceous vegetation growing in the River or its tributary.
- C Development activities shall not be permitted within the 550-foot development restriction zone of stream's edge within the Zone except for the creation of wetlands and passive recreational uses, when an applicant can demonstrate that such passive recreational uses shall not adversely affect aquatic and wetland dependent wildlife; the habitat of an endangered species, a threatened species or a species of special concern; water quality, hydrology or quantity; groundwater tables or surface water levels;
- D Forested habitat fragmentation within the Zone shall be limited, and there shall be no additional crossing by road, rail or utility corridors of lands located within the Zone unless the following three conditions are all met:
- 1 There is no feasible and prudent alternative to the proposed crossing as determined by the County;
 - 2 All possible measures to minimize harm to the resources of the Econlockhatchee River Basin will be implemented; and
 - 3 The crossing supports and activity that is clearly in the public interest as determined by the County.
- E Only residential development will be permitted within the Zone except for the wetland creation or passive recreation referenced in point "C" above.

- F Development within the Econlockhatchee River Basin as a whole shall ensure the protection of floodplain, wetlands and critical native upland habitat; encroachment (fill) proposed to be placed or deposited within the 100 year floodplain as identified by the Federal Emergency Management Administration must comply with all applicable Federal and County regulations;
- G All proposed development within 2,000 feet of the stream's edge of the Big Econlockhatchee River and its tributaries shall submit, as part of the development application information, a statement from a qualified archaeological consultant describing the potential for archaeological resources to occur on the project site. If, in the opinion of the consultant, such resources are likely to occur, a professional archaeological survey shall be submitted as a part of the development application provided to the County. If significant resources are found to be present, the County shall consult with the appropriate State authorities for guidance as to whether excavation is desired by such authorities, and shall otherwise direct that resources shall be preserved as a part of the open space preserved on the site;
- H The Land Development Code shall ensure minimal removal of native habitats and preservation of rare upland habitats; and
- I The Land Development Code shall provide for an appeals process and projects which are exempt from these performance standards by reason of prior approvals or other legal bases.

OBJECTIVE FLU 11 PRESERVE RURAL LIFESTYLES IN SEMINOLE COUNTY

The County shall continue to implement and enforce policies and programs designed to preserve and reinforce the positive qualities of the rural lifestyle presently enjoyed in East Seminole County, referred to herein on occasion as the "Rural Area," (as defined in *Exhibit FLU: Special Area Boundaries* and *Exhibit FLU: Rural Boundary Map*) and thereby ensure the rural lifestyle is available to future residents.

Policy FLU 11.1 Recognition of East Rural Area

The County shall continue to enforce Land Development Code (LDC) provisions and Implement existing land use strategies and those adopted in 2008 that were based on the Rural Character Plan of 2006 and that recognize East Seminole County as an area with specific rural character, rather than an area anticipated to be urbanized. It shall be the policy of the County that rural areas require approaches to land use intensities and densities, rural roadway corridor protection, the provision of services and facilities, environmental protection and LDC enforcement consistent with the rural character of such areas.

Policy FLU 11.5 Roadway Corridor Overlay District for Major Roadways in East Seminole County

The County shall continue to enforce Land Development Code provisions relating to the East Seminole County Scenic Corridor Overlay District Ordinance for major roads in East Seminole County in order to regulate land development along major roadways to improve or protect the rural character of the area. The overlay corridor classification shall extend 200 feet on each side of the road right-of-way which will generally correspond to the building, parking, and clearing setbacks unless specifically determined that a particular structure or activity that is located upon property assigned the classification uniquely re-enforces the rural character of the area. The overlay district shall regulate land development along the major roadway system in East Seminole County by, at a minimum, establishing standards for:

- A Land use types and frequencies;

- B Preservation of existing canopy trees;
- C Planting of new canopy trees;
- D Landscaping requirements;
- E Clearing setbacks and restrictions;
- F Building character, setbacks and locations;
- G Location of parking;
- H Location of equipment storage;
- I Walls, fences, entrance features and similar structures;
- J Location and design of retention ponds;
- K Access management;
- L Number of travel lanes;
- M Number and location of traffic signals;
- N Absence or presence of overhead powerlines or their presence on only one side of the street with lateral crossings underground;
- O Location and design of signage;
- P Location and design of street lights; and
- Q Easements, deed restrictions and other instruments required to perpetually preserve the undeveloped portion of the roadway corridor.

For the purposes of this policy the term "major roadway system" means County Road 419, State Road 46, County Road 426, and Snowhill Road, to the extent that they are located in East Seminole County.

Policy FLU 11.9 Rural Roadway System Level of Service Standards

The County has adopted rural roadway level of service standards. The major and minor roadway system in the Rural Area currently consists of two lane facilities. County Road 419 west of Snowhill Road (formerly Chuluota Bypass) is the only segment programmed for a four lane improvement. The other roads are not expected to require, nor are they planned to receive, capacity improvements over the 20 year planning period. The County shall discourage additional roadway capacity expansions and proceed to regulate these facilities consistent with the East Seminole County Scenic Corridor Overlay District requirements.

Policy FLU 11.14 Protection of Natural Resources

The County shall:

- A Protect wetland and floodprone areas in the Rural Area consistent with the provisions of the Future Land Use and Conservation Elements of this Plan and through the potential purchase of properties with funds deriving from the Natural Lands Program authorized by voter referendum in 1990 and 2000.
- B Periodically re-evaluate the effectiveness of the County Arbor Ordinance, referenced by *Policy FLU 1.18 Arbor Regulations*.
- C Protect groundwater systems in the Rural Area as depicted in *Exhibit FLU: Special Area Boundaries*, including, but not limited to, the "Geneva Freshwater Lens" by:

- 1 Continuing to permit only large lot residential development in the Rural Area to minimize water consumption and maximize aquifer recharge due to small impervious surface areas;
 - 2 Relying on a system of small individual residential wells for the provision of potable water that disperse the potentially adverse effects of groundwater drawdown associated with excessive pumping of the aquifer;
 - 3 Relying on properly installed and periodically inspected septic tanks on large lots that return water to the aquifer to be the primary system of wastewater disposal; and
 - 4 Relying on stormwater management systems designed as required by the Rural Subdivision standards enacted in accordance with the provisions of this Plan to maximize recharge of stormwater into the aquifer.
- D Protect the Econlockhatchee River in East Seminole County by:
- 1 Regulating development within the River basin in accordance with *Policy FLU 1.9 Wekiva and Econlockhatchee River Protection* and *Policy FLU 1.10 Econlockhatchee River Basin Protection*;
 - 2 Continuing to regulate development adjacent to the Econlockhatchee River in accordance with the Econlockhatchee River Protection Overlay Standards Classification, which implements *Policy FLU 1.10 Econlockhatchee River Basin Protection*;
 - 3 Purchasing properties, when appropriate, with funds from the Natural Lands Program and other Federal, State, and regional programs; and
 - 4 Enforcing provisions in the Land Development Code regarding additional bridge crossings of the Econlockhatchee River.
- E Protect the St. Johns River by:
- 1 Continuing to enforce the Environmentally Sensitive Lands Overlay (see *Policy FLU 1.3 Wetlands Protection*); and
 - 2 Purchasing properties, when appropriate, with funds from the Natural Lands program and other Federal, State and regional programs.

Policy FLU 11.15 Code Enforcement and Implementation

A General - The County shall:

- 1 Continue to enforce Rural Subdivision Standards, as necessary, designed to meet the unique needs of the Rural Area;
- 2 Continue to provide inspection and code enforcement services in the East Rural Area; and
- 3 Continue to pursue a Joint Planning Agreement with the City of Winter Springs for the purpose of achieving *Objective FLU 11 Preserve Rural Lifestyles in Seminole County*.

B Existing Conditions

It is the intent of the County to guide the future development and use of the Rural Area as depicted in *Exhibit FLU: Special Area Boundaries*. For the purposes of the lands within the Rural Area (including Suburban Estates, Rural-3, Rural-5, and Rural-10 land use designations) structures existing as of the adoption date of the 1991 Comprehensive Plan shall be permitted to be rebuilt in the event of a natural disaster or act of God or be otherwise improved as long as the gross density of residential property or intensity of

nonresidential property is not increased and/or the land use remains consistent with those regulations in effect as of the adoption date of the 1991 Comprehensive Plan.

Lots and parcels of record as of the date of adoption of the 1991 Comprehensive Plan, with the exception of those with a Suburban Estates future land use designation assigned to the property, shall be allowed to be built upon even if they do not conform to the currently adopted building site area regulations, as long as all other land development regulations are met and the lot was legally created prior to 1991.

The County shall provide that lots or parcels of record, platted or unplatted, zoning A-3, A-5 or A-10 that have been or are reduced in size by the amount of land dedicated or conveyed for public road rights-of-way, shall be considered as if there had been no such reduction in size for purposes of land use consistency and dwelling unit yield determination. Furthermore, such dedication or conveyance shall not operate to divest property owners of any rights existing under the existing provisions of Section 35.2(a) of the Land Development Code of Seminole County or any other vested property rights whenever such lots or parcels of record that qualified under Section 35.2(a) of the Land Development Code of Seminole County for subdividing prior to a Right of Way dedication or conveyance, have been or are reduced by 20% or less in size by land dedicated or conveyed for public road rights-of-way. Such lots or parcels can be subdivided consistent with that Section provided that one lot created shall meet the minimum lot size requirement of the applicable zoning district and the other lot shall have a buildable area equal to at least one acre located above the 100 year floodplain elevation. For example, a parcel (platted or unplatted) that was originally ten acres in size that now contains only 9.17 acres located above the 100 year floodplain elevation because, and solely because, land from the original parcel was dedicated or conveyed for a public road right-of-way, will be considered a ten acre parcel.

Lots and parcels of record assigned the Suburban Estates future land use designation and which have a residential zoning classification within the Suburban Estates land use designation, shall be permitted to be developed provided that all applicable zoning regulations and land development regulations are met and the lot was legally created prior to 1991.

Parcels of record shall include all parcels of land recorded and all lots which are part of a subdivision plat, 5 Acre Resolution or Waiver to Subdivision Regulations which have received final approval or execution prior to the adoption of the 1991 Comprehensive Plan.

Parcels of record, as described herein and determined to be in fact and completely environmentally sensitive lands, shall be allowed to build a maximum of one single family residence per such parcel of record as subject to any and all other development regulations, requirements and restrictions. (*See Future Land Use Element - Definitions of Future Land Use Designations - Conservation regarding allowed uses and special provisions of development.*)

This provision is based on the following findings:

- 1 These lots and parcels are a generally accepted development pattern by residents of the East Area of Seminole County;
- 2 The grandfathering of these certain lots and parcels will not adversely affect the overall intent and objectives of the Rural Area Plan;

- 3 Development of lots deriving from these lots and parcels will be subject to all Land Development Code provisions and therefore will further implement the provisions of the Rural Area Plan; and
- 4 There are expressed expectations and Intent by these existing property owners to use their property in a certain manner as evidenced through their application for and action by the County to record a parcel, approve and maintain as valid a final Development Order or execute a Five-Acre Resolution.

C Family Farms

The County shall facilitate the continuation of the family farm by permitting family subdivisions. It is the intent of the Rural-10 and Rural-5 land use designations to permit the development of tracts of land for the use of family members for their primary residences. For the purpose of the Rural-10 and Rural-5 designations, property developed and/or subdivided for the use of immediate family members for their primary residence shall not be limited in density to one dwelling unit per 10 acres, but may be developed for up to three family residences on a minimum of 10 acres notwithstanding the density pursuant to the clustering provisions established in this Plan. Immediate family is defined as persons related by blood, marriage, or adoption, such as parents, spouses, siblings and children. Those provisions shall not be construed to permit land to be subdivided in a lot size smaller than one acre.

Policy FLU 11.20 Protection of Character of East Rural Area Neighborhoods

- A The County shall seek partnerships and grant assistance in order to support the citizens of Geneva to provide infrastructure improvements that support and reinforce the historic character of the area.
- B The County shall protect the character of the East Rural Area through the use of performance standards that require that public facilities serving the East Rural Area, including roadways, shall be designed in a context sensitive manner to ensure protection of the character of the East Rural Area.
- C Development in the East Rural Area shall be guided by performance standards in the Land Development Code that limit densities in accordance with the Future Land Use designation; preserve natural and agrarian areas; allow limited commercial uses in village settings or as roadside stands on bona fide agricultural properties; provide use restrictions and tree protection standards; limit the extension of urban infrastructure; provide opportunities for nature-based recreation and protect the Geneva Freshwater Lens, watersheds, wetlands and sensitive upland systems.

Transportation Element

GOAL TRA 1 COUNTRYSIDE AND CONSERVATION

The County shall develop and maintain an effective, convenient and economically feasible transportation system in its Rural Countryside and Conservation Areas that provides regional access for people and goods, is compatible with environmental conservation, provides access to recreational opportunities, and that preserves the rural quality of life.

Policy TRA 1.1.3 Policy Constrained County Facilities

For County roadways within Countryside (East Rural) and Conservation areas, all arterial road segments shall be constrained to four lanes and all collector road segments shall be constrained to two lanes.

OBJECTIVE TRA 1.2 LAND USE AND DESIGN COORDINATION

The County shall establish and enforce land use, performance frameworks and transportation policies, standards and regulations in the countryside area that coordinate the development of the transportation system with the land development activities shown on the Future Land Use Map exhibit and which discourage urban sprawl through implementation of the following policies.

Policy TRA 1.2.1 Consistency with Future Land Use Element

In terms of all development proposals, the County shall require consistency between the Future Land Use Element and the Transportation Element and all land development activities shall be consistent with the adopted Future Land Use Element.

Policy TRA 1.2.2 Transportation/Land Development Coordination

To provide adequate accessibility to land use activities and to preserve the mobility function of major roadways and to discourage urban sprawl, the County shall continue to adopt and enforce policies, standards and regulations which relate the design and function of the roadway to the type, size and location of the land uses which they serve.

Policy TRA 1.2.3 Coordinating Compatibility with Future Land Use Designations

The County shall coordinate with the Florida Department of Transportation, Florida's Turnpike Enterprise, MetroPlan Orlando, and other appropriate entities to ensure that new roadways or improvements to existing regional roadways in Rural Areas are designed in a way that is compatible with surrounding Future Land Use designations. The County shall ensure that proposed projects are designed in a context-sensitive fashion that addresses the physical, social, and environmental character of the area by requesting that the agencies responsible for the roadway improvements use the Federal Highway Administration process for Context Sensitive Solutions, or a similar process, for ensuring a collaborative, interdisciplinary planning process that involves all stakeholders in developing a transportation facility that (1) complements its physical setting; (2) preserves scenic, aesthetic, historic and environmental resources; and (3) maintains safety and mobility.

OBJECTIVE TRA 2.2 CENTERS AND CORRIDORS LAND USE, PERFORMANCE FRAMEWORKS, ENERGY CONSERVATION, AND MOBILITY COORDINATION

The County shall establish and enforce land use, performance frameworks and mobility policies, quality/level of service standards and land development regulations in major transit development/redevelopment corridors and mixed-use centers that coordinate the transportation system with the land uses shown in the Future Land Use map, and that discourage urban sprawl, encourage energy conservation, reduce vehicle miles traveled, and reduce greenhouse gas emissions through implementation of the following policies.

Policy TRA 2.2.1 Consistency with Future Land Use Element

In terms of all development proposals, the County shall ensure a linkage between the Future Land Use Element and the Transportation Element and all land development activities shall be consistent with the adopted Future Land Use Element.

Policy TRA 2.2.4 Transportation/Land Development Coordination

To provide adequate accessibility to land use activities and to ensure mobility while discouraging urban sprawl, the County shall adopt and enforce policies, performance frameworks and regulations that relate the design and function of the mobility options to the type, size and location of the land uses they serve.

Policy TRA 2.5.3 Review of Development Applications

As part of the review of development applications, the County shall evaluate the potential impacts of the proposed development on surrounding residential neighborhoods (particularly cut-through automobile traffic impacts) and, as may be required, conditions for approval which will mitigate the potential impacts of the proposed development on surrounding neighborhoods.

OBJECTIVE TRA 3.2 COORDINATION WITH NATURAL RESOURCES, ENVIRONMENTAL QUALITY

The County shall continue to implement policies, performance frameworks and regulations as one means of coordinating the future development of the multi-modal transportation system with the County's desire to conserve natural resources, protect the East Rural Area, maintain the quality of the environment and to improve the aesthetic and sensory quality of the urban community through the implementation of the following policies.

Policy TRA 3.2.1 Consideration of Techniques to Protect Natural Resources, Environmental Quality

In the planning, design and construction of multi-modal transportation improvements, the County shall take into consideration:

- A Design techniques to mitigate adverse impacts on natural resources, the quality of the environment and surrounding development;
- B Design and operational techniques which complement adjacent development, preserve existing tree canopy to enable absorption of carbon dioxide and provide shade for pedestrians, and enhance the aesthetic and sensory quality of the transportation corridor; and
- C Operational techniques to minimize fuel consumption, conserve energy, and reduce greenhouse gas emissions through increased transit use, ridesharing, walking and bicycling.

Policy TRA 3.2.4 Enforcement of Environmental Regulations

In the planning, design and construction of new transportation facilities, the County shall continue to enforce policies, standards and regulations which provide for the protection of wetland areas by requiring documented evidence of an overriding public interest and appropriate mitigation of any unavoidable disturbance of the wetland areas as required by other environmental agencies.

Policy TRA 3.2.7 Support Quality of Environment

The County shall continue to consider mass transit, paratransit and transportation demand management activities as one means of supporting the County's goals, objectives and policies to conserve natural resources, maintain the quality of the environment, reduce greenhouse

gas emissions, improve the aesthetic and sensory quality of the urban community, and discourage urban sprawl.

Policy TRA 3.4.1 Coordination of Plans and Programs

Through its transportation planning program, comprehensive planning program, representation on boards and committees, and through other activities, the County shall continue to coordinate its transportation plans and programs with those of:

- A Florida Department of Transportation;
- B East Central Florida Regional Planning Council;
- C METROPLAN Orlando;
- D Central Florida Regional Transportation Authority (aka LYNX);
- E SunRail;
- F Other transit providers;
- G Transportation authorities;
- H Orlando Sanford International Airport;
- I Other counties and municipalities; and
- J With any other plans or programs prepared pursuant to Chapter 380, Florida Statutes.

In addition, the County shall coordinate airport and rail expansion plans with the appropriate agencies and plans, including, but not limited to, the:

- A Army Corps of Engineers;
- B Federal Aviation Administration;
- C METROPLAN Orlando;
- D Military services;
- E Approved Resource Management Plan;
- F Department of Transportation 5-Year Transportation Plan;
- G Adopted Continuing Florida Aviation System Planning Process; and
- H All Joint Planning Agreements.

Policy TRA 3.4.4 Mitigation of Impacts of Extra-Jurisdictional Traffic

The County shall coordinate with the Florida Department of Transportation, the Florida Department of Community Affairs, and appropriate local governments, on a program and schedule for mitigating the impacts of extra-jurisdictional traffic on the County and State road system.

Policy TRA 3.4.24 Coordination on Regionally Significant Transportation Corridors.

The County shall coordinate with all appropriate local, regional, State, and federal agencies, particularly the municipalities in Seminole County, the Counties of Orange, Lake, and Volusia, Florida Department of Transportation, and the Central Florida Regional Transportation Authority (LYNX) regarding the location, classification, planning, and construction of needed transportation system improvements within the County. The County shall fully evaluate newly proposed regionally significant transportation projects not identified in the Comprehensive Plan to ensure that they support the vision of the County with regard to mobility, land use, environmental protection, and other provisions of the Comprehensive Plan.

Conservation Element

Issue CON 10 Central Florida Regional Growth Vision and Seminole County Natural Lands Program

In 2007, the Central Florida Joint Policy Framework Committee created a regional growth compact consisting of regional growth principles. Among these is a principle to "Preserve open space, recreational areas, farmland, water resources, and regionally significant natural areas." The Conservation Element includes goals, objectives, and policies that significantly address each of these principles. These principles grew out of a visioning process conducted during 2006 and 2007. The process involved approximately 20,000 Central Florida residents who were asked to answer the question "How Shall We Grow?" through a series of community meetings, presentations and surveys. The product of this process, "The Central Florida Regional Growth Vision" represents a shared vision of the preferred method for directing the growth of the six county region that includes Seminole County between 2007 and 2050. By 2050, the population of the region is expected to more than double from 3.5 million to 7.2 million residents, thus necessitating development of a guiding Vision.

The Conservation Element goal focuses on protection and preservation of open space, recreational areas, farmland, water resources, and regionally significant areas consistent with this Regional Vision.

The citizens of Seminole County recognized the need, in advance of most local governments in Central Florida, to protect, by acquisition, natural lands for preservation and passive resource-based recreation through voter-approved referendums. In 1990, the voters of Seminole County approved a \$20 million-dollar bond, which created the Seminole County Natural Lands Program (NLP). The NLP subsequently established a system to assess, rank and purchase environmentally significant lands throughout the County. Again, in 2000, a voter-approved referendum provided for \$25 million dollars with \$20 million dollars for support of the County trails program and \$5 million dollars for natural lands. The County used these monies to purchase lands to preserve and/or restore their important ecological functions, as well as provide sites for passive resource-based recreational activities. Since the inception of the program, Seminole County has purchased and currently manages just over 6,600 acres of land through the NLP.

Wilderness areas and trails created from these referendums include the Black Bear, Black Hammock, Geneva, Chuluota, Lake Proctor, Econ River, Lake Jesup, and Spring Hammock Preserve. These environmental assets are open to the public for environmental education and passive recreation. The County designated these lands as "Preservation/Managed Lands" on the Future Land Use Plan Map in 2008 in response to the 2006 Evaluation and Appraisal (EAR) Major Issue finding of a need to ensure that the County Comprehensive Plan is more accessible and understandable.

The County currently operates three showcase trails within the County's trail network. These trails include the Seminole Wekiva, Cross Seminole, and Flagler Trails, among several of the County's trail network.

The County shall continue to manage the more than 6,600 acres of Natural Lands acquired through the 1990 Natural Lands Bond Referendum and November 2000 Natural Lands-Completing the Connection Bond Referendum, for the acquisition of significant natural habitats, open space areas and greenways.

The County shall continue to coordinate with the State of Florida, the St. Johns River Water Management District, the Nature Conservancy, the Trust for Public Lands, the Congress of Regional Leaders of *myregion.org*, and all other agencies involved in preservation of environmental assets to create a Countywide and regionally linked open space system and Greenways/Trails/Blueways system that assists in permanent preservation of County and regional environmental assets. As a part of this effort, the County shall continue to support attempts by the State Legislature to identify and fund a successor program to the Florida Forever grant program that assists with local efforts to acquire environmentally significant features.

Each of these efforts clearly demonstrates Seminole County's consistency with and implementation of the conservation theme of the Regional Vision of preserving Central Florida's lands, waters, air, and wildlife, and the ongoing 'Green Print' process undertaken by the Congress of Regional Leaders, as a part of the Central Florida Regional Growth Vision.

These efforts also support the direction of the Legislature, through House Bill 697 enacted in 2008, to conserve energy by conserving environmental lands. Each preserved area removes land from potential development, thus reducing the possibility of urban sprawl, which requires greater use of automobiles by those seeking to reach distant homes or employers.

GOAL

Preserve, properly manage and, where possible, enhance the quantity, quality and function of Seminole County's natural resources for existing and future generations to include, but not be limited to the following natural resources: air, surface waters, groundwater supplies, soils/minerals, wetlands, native habitat and wildlife, floodplain, endangered, threatened and species of special concern, open spaces, aquifer recharge areas, and historic and archaeological resources.

Policy CON 3.8 Econlockhatchee River Basin Protection

The County shall continue to regulate development consistent with the Seminole County Econlockhatchee River Basin Protection Ordinance to ensure its preservation as a recognized outstanding natural resource. This basin is shown on Exhibits FLU: Resource Protection Areas and CON: Econlockhatchee and Wekiva River Protection Areas and Wekiva Study Area. Minimum ordinance provisions necessary to ensure protection of the Econlockhatchee River Basin shall include:

- A A 550 foot development restriction zone;
- B Provisions for density transfers outside of protection zones and critical habitats;
- C Protection of floodplain, wetlands, and rare upland habitat;
- D Historic and archaeological resource assessments; and
- E Minimal removal of native habitats.

Policy CON 3.9 Econlockhatchee River Outstanding Florida Water Designation

The County shall continue to manage and regulate development along the Econlockhatchee River to ensure its continued designation as an outstanding Florida Water Body and ensure that all development is consistent with the Econlockhatchee River Protection Overlay Standards Classification.

Policy CON 7.2 Special Area Protection

The County shall continue to enforce and apply all special federal, State, and local provisions that relate to protection of wetlands and their functions, including:

- A The Wekiva River Protection Area as defined in Section 369.303(9), Florida Statutes, *Policy FLU 1.9 Wekiva and Econlockhatchee River Protection* and *Objective FLU 13 Protection of the Natural Resources of the Wekiva Study Area* and its policies, contained within the Seminole County Comprehensive Plan;
- B The Wekiva Global Compliance Agreement;
- C All provisions set forth in the Land Development Code of Seminole County relating to protection of wetlands and intended to implement the wetland protection policies of this Plan;
- D The Econlockhatchee River Protection Ordinance;
- E Standards set forth in this Plan which protect the Rural Area; and
- F All State and Water Management District wetland protection requirements, including:
 - 1 The St. Johns River Water Management District's Wekiva and Econlockhatchee Riparian Habitat Protection and Water Quality Zone Standards; and
 - 2 The St. Johns River Water Management District's Drainage Basin Rules as applicable to Nested Basins and Specially Designated Basins.

COMPREHENSIVE WETLANDS MANAGEMENT STRATEGY

INTRODUCTION

Seminole County uses a multi-faceted system to direct incompatible land uses away from wetlands. To date, this system has managed to preserve most of the wetland acreage in the urban area; however, the function of impacted systems has been altered (Econ Basin Study, Soldier's Creek Basin Study 2001, J. Exum and C. Shadrix). There are three primary methods by which the County directs incompatible land uses away from wetlands, and several secondary methods, all of which are described in the following narrative.

Primary Methods of Directing Incompatible Uses Away from Wetlands

- **Identification of Environmentally Sensitive Lands.** The first of these is the identification of environmentally sensitive lands that are to be preserved during the development process. As stated in *Objective FLU 5 Future Land Use Map Foundation*, preservation, preservation of natural resources is one of the foundations of the County's Comprehensive Planning process, innovative planning techniques and land development regulations.
- **Land Acquisition.** The second primary means of protecting wetlands is reliance on land acquisition via the County's Natural Lands Program, the St. Johns River Water Management District, and the Florida Department of Environmental Protection. To date, there are over 18,000 acres of the County's 41,000 acres of wetlands in public ownership, which translates to roughly 43% (source: Seminole County Information Technology Services).
- **Special Areas.** The County and State have designated areas (Future Land Use Element) for special consideration to protect wetlands. These include the Wekiva River Protection Area and the Econlockhatchee River Protection Zone, as well as the special East Rural Area.

Secondary Methods of Directing Incompatible Uses Away from Wetlands

The secondary methods of directing incompatible uses away from wetlands are through the implementation and execution of the Comprehensive Plan's Future Land Use designations, and the Land Development Code of Seminole County.

- **Special Techniques.** For example, allowing clustering of development, or planned development, in exchange for preserving open areas, which protects natural resources from development.
- **The Environmentally Sensitive Land Overlay.** This method, which could be considered the cornerstone of wetlands protection techniques, limits the permitted uses on wetland properties.
- **The Urban/Rural Boundary.** This Boundary forms the foundation for both wetland regulation and for the land uses that are assigned throughout the County. The County's Comprehensive Plan includes criteria regarding the locational analysis component of Standards for Amending the Urban/Rural Boundary (FLU Element) that further protect wetlands.

Tertiary Methods of Directing Incompatible Uses Away from Wetlands

Tertiary methods of wetland protection included:

- Application of the Environmentally Sensitive Land Overlay through continued implementation of *Policies FLU 1.1 Environmentally Sensitive Lands, 1.2 Floodplain Protection, 1.3 Wetlands Protection, 1.4 Conservation Easements, 12.8 Compliance Agreements Between Seminole County and the Florida Department of Community Affairs, 12.9 Wekiva River Protection Area Environmental Design Standards, and Objective FLU 13 Protection of the Natural Resources of the Wekiva Study Area* and its policies used to protect wetlands from incompatible uses.

LAND ACQUISITION

The purchase of environmentally sensitive lands is perhaps the most significant tool used to protect wetlands. Three primary public entities have purchased thousands of acres of environmentally sensitive lands in Seminole County: the Seminole County Natural Lands Program, the St. Johns River Water Management District, and the Florida Department of Environmental Protection. Seminole County, which has adopted as its motto "Florida's Natural Choice", has long recognized the value of preserving its natural environment, not only for the sake of preservation, but also to achieve other important economic and community development goals. The Seminole County Comprehensive Plan was amended in 1987 and embraced the basic tenants of sustainable development. The Plan recognized the importance of balancing urban growth with the preservation of the County's pristine natural resources, including the St. Johns River, the Wekiva River, and the Econlockhatchee River, as well as over 55 listed species of plants and animals. In 1990, the voters of Seminole County approved a referendum that allocated \$20 million dollars towards the purchase of ecologically valuable lands for the purpose of preservation and passive recreation.

The passing of the natural lands referendum presented more than just an opportunity for the County to preserve natural resources, it also represented an opportunity for the County to partner with State and federal agencies to purchase lands and provide a larger base from which to fund purchases. To date, over one-fifth of Seminole County has been set aside in public ownership. This was made possible largely due to the active support of the community, including land donations from property owners and developers. This program made it possible to try and protect some of the systems that together form a mosaic of high-quality wetlands and uplands that extend into other counties of the region, resulting in the protection to date

of approximately 43% of wetlands in Seminole County. In 2000, the voters of Seminole County continued the commitment to preservation by approving an extension of five million dollars for purchase of additional natural lands and \$20 million dollars for the development of greenways and trails that will connect these areas. The Exhibit *FLU: Conservation and Trails Corridors* clearly depicts the extent of publicly owned land in Seminole County to date.

FUTURE LAND USE MAP

Objective FLU 5 Future Land Use Map Foundation states "The County shall continue to develop and enforce innovative planning techniques and land development regulations designed to support the Central Florida Regional Growth Vision...and regionally significant natural areas. The Future Land Use Map series embodies strategies designed to build long term community value, discourage urban sprawl and ensure that public facilities and services are provided in the most cost-effective and efficient manner. This serves as one of the cornerstones for the form of development on the urban and rural landscapes, and clearly states as an objective that preservation of natural resources is a priority. *Exhibit FLU: Future Land Use Map* details the focus of land use in the County, which is notably dominated to the east by the areas assigned the Environmentally Sensitive Lands Overlay identification, illustrated by the use of a symbol imposed on top of areas with Future Land Use designations that include, but are not limited to, Rural 3, Rural 5, Rural 10, and Low Density Residential. From a view of this map, it is important to point out several items. First, there are the Resource Protection Areas, illustrated on *Exhibit FLU: Resource Protection Areas*, and include the Wekiva River Protection Area, the Econlockhatchee River Basin, and the Geneva Lens Area, the latter of the two are contained within the designated East Rural Area. These areas are already receiving special protection from state and County regulations above and beyond that which is normally required. Second, it is also important to point out that the Wekiva River Protection Area (WRPA) has protection via the Wekiva Global Compliance Agreement (and subsequent amendment to policy by the Seminole County Comprehensive Plan) that allows no wetland impacts, and requires a 50 foot upland buffer around all wetlands in the WRPA, which is in addition to the St. Johns Water Management District Riparian Habitat Protection Zone (RHPZ) and protection zone requirements. The Econlockhatchee River also has a RHPZ requirement by both the County and the District. These areas are considered special areas in this process and described in greater detail below. With the exception of these special areas, only a small area within the designated urban area is the focus of discussion. This includes the portions of the County surrounding the cities of Altamonte Springs, Casselberry, and Winter Springs, and the area south of the City of Oviedo. There are relatively few wetlands in these areas compared to those in public ownership and those in the East Rural Area. Most of these wetlands are surrounded by intense development by the municipalities, although the predominant land use assigned by Seminole County is Low Density Residential, and Planned Development (see "Unique Planning Techniques").

SPECIAL AREAS

As stated previously, there are three special areas in the County that make up roughly 75% of the County's landform (unincorporated area): "The Wekiva River Protection Area", The Econlockhatchee River Basin, and the "East Rural Area," which includes much of the Econlockhatchee River Basin. *Issue FLU 11 Protection of Rural Areas* describes the protection of the Wekiva and Econlockhatchee areas. The "Wekiva River Protection Area" and "East Rural Area" represent two separate and distinct areas within Seminole County where the Comprehensive Plan sets forth specific policy guidance for the long-term maintenance of rural character.

In 1988, the Florida Legislature enacted the "Wekiva River Protection Act" for the purpose of protecting the natural resources and rural character of the "Wekiva River Protection Area" as defined in the Act. To comply with the Act, the County amended its Comprehensive Plan creating a set of Plan policies to ensure the maintenance of the rural density and character in the aggregate, protect natural resources, and ensure the long-term viability of the Wekiva River Protection Area (WRPA) (see *Objective FLU 14 Revitalization of Major Corridors* and the *Exhibit FLU: Future Land Use Map* of this Plan). In 1999, with assistance from the Florida Department of Community Affairs, various environmental groups and citizens, the County adopted a Plan objective and additional set of Plan policies, substantially based on the "1999 Wekiva Special Area Study", to provide greater protection for this area. The Comprehensive Plan also establishes that wetlands within the WRPA shall be protected, and a 50 foot upland buffer shall be required around all wetlands. As additional protection, development activity (including the placing or depositing of fill within wetlands and the 100-year floodplain identified by FEMA), within the Wekiva River Protection Area shall be prohibited except in cases of overriding public interest. Where wetland values are degraded due to overriding public interest, mitigation efforts shall occur. Floodplain impacts will require compensating storage.

The Wekiva and Econlockhatchee River Basins were also designated as Nested Basins by the St. Johns River Water Management District in 2000, meaning that most of the mitigation projects for wetlands in these areas are required to remain within the basin. This is in addition to the requirement for compliance with 550 foot Riparian Habitat Protection Zones for both basins. The Lake Jesup Basin was designated by House Bill 2365 as a Special Basin unto itself during the 2000 session, which created additional requirements that exceed those with nested status.

In 1991, the County's Comprehensive Plan was amended, based on the "1991 East Seminole County Rural Area Plan" to create the "East Rural Area" of Seminole County (see *Objective FLU 11 Preserve Rural Lifestyles in Seminole County* and the *Exhibit FLU: Future Land Use Map* of this Plan). This Plan amendment created and assigned a set of Rural future land use designations (Rural-3, Rural-5, and Rural-10) and associated rural zoning classifications (A-3, A-5, and A-10) to properties within the East Rural Area. These land use designations and zoning classifications, together with Plan policies and Rural subdivision standards, were established to preserve and reinforce the positive qualities of the rural lifestyle of the East Rural Area. In 1999, the Comprehensive Plan was amended, based on the "1999 Chuluota Small Area Study" to further strengthen the rural character of the East Rural Area. The East Rural Area of Seminole County is distinguished from the County's predominantly urban area by the Urban/Rural Boundary (see the *Exhibit FLU: Future Land Use Map* of this Plan).

Policy FLU 11.1 Recognition of East Rural Area states, "The County shall continue to enforce Land Development Code provisions and land use strategies that recognize East Seminole County as an area with specific rural character rather than an area anticipated to be urbanized. It shall be the policy of the County that Rural Areas require approaches to land use intensities and densities, rural roadway corridor protection, the provision of services and facilities, environmental protection and Land Development Code enforcement consistent with the rural character of such areas." *Policy FLU 11.4 Rural Cluster Development* sets guidelines for cluster development in the Rural Area, and includes as an objective the protection of natural resources.

In addition to the studies cited above, the Board of County Commissioners approved the Seminole County 2006 Rural Character Plan. In summary, this Plan identifies issues and concerns affecting preservation of the East Rural Area and an evaluation of Comprehensive Plan policies and land development regulations. The Comprehensive Plan also attempts to provide a balance and thoughtful series of recommendations designed to maintain and protect the rural character of the East Rural Area. The Plan represents a collaborative effort between

Seminole County and the citizens of the East Rural Area and includes recommendations for tools or strategies to preserve the rural character and lifestyle of the East Rural Area.

Urban/Rural Boundary

Having established that the East Rural Area contains a high-quality mosaic of valuable wetland and upland systems, it is important to recognize that the County has adopted a limited number of land use designations of very low density in the Rural Area to protect these resources. This entire program is detailed in the Future Land Use Element under the heading, "RURAL LAND USE CATEGORIES," which defines the criteria for the Rural-3, Rural-5, and Rural-10 Future Land Use designations. Seminole County requires an amendment to the Urban/Rural Boundary to allow for a land use change beyond these three designations, and has added protection of wetlands to the criteria for amendment of this boundary (see FLU Element, Standards for Amending the Urban Rural Boundary).

Unique Planning Techniques

An effective by-product of the Future Land Use designations is the application of unique planning techniques, such as clustering. Clustering is one of the most effective tools for preserving wetlands during development, when applied properly. Currently, clustering is encouraged in Planned Developments, the Wekiva River Protection Area (*Objective FLU 14 Revitalization of Major Corridors*) and the East Rural Area (*Policy FLU 11.4 Rural Cluster Development*). There are demonstrated examples of the success of this technique in Seminole County (Alaqua Lakes, Magnolia Plantation).

Environmentally Sensitive Lands Overlay

Perhaps the most important component of wetland protection resulting from the Future Land Use Element is the Environmentally Sensitive Lands Overlay. The County uses this tool to regulate development and preserve environmentally sensitive areas including both wetlands and floodplains. By definition, the Environmentally Sensitive Lands area is an overlay that includes the extent of floodplains and wetlands in Seminole County. This information is consistently based on the most recent data provided by the St. Johns River Water Management District. These data are subject to the limitations of existing data from a variety of sources, including National Wetlands Inventory and US Geological Survey Data. In most cases, the extent of wetlands from a jurisdictional standpoint is determined via ground-truthing as part of an official wetlands survey. This is discussed as a process in the latter part of this section. The Environmentally Sensitive Lands Overlay is implemented for wetland protection via the regulation of development consistent with the provisions of the Land Development Code of Seminole County (LDC), and contains very specific criteria and performance standards that preserve wetlands to the maximum extent possible. In conjunction with the LDC update, scheduled for completion by 2010, the County will evaluate the need to provide a more comprehensive series of wetland regulations that includes the significance, type, land use, extent, development compatibility, and performance standards prior to County review and approval. In addition to these standards, dedication to the County of all post-development wetlands is required (see *Policy FLU 1.2 Floodplain Protection*). In the past the County enforced a percent impact based program (i.e., where only 10% of wetlands on site were allowed to be impacted). Currently, the County enforces a mitigation based program which focuses maximum protection on the rural Area of the County along with the Wekiva River Protection Area. The specific mechanisms will be contained in the LDC; however, the intent of this narrative as policy is to identify the rationale that there are important functional differences of systems in the East Rural Area that are vital to the natural wealth of the County.

The Environmentally Sensitive Lands Overlay is used to identify where wetlands exist and is applied as one of the first steps in a developer's process of site evaluation. Typically, the developer is responsible for having on-site wetlands delineated and signed off by the jurisdictional agencies (US Army Corps of Engineers, Florida Department of Environmental Protection, St. Johns River Water Management District, and Seminole County's Natural Resources Officer). Once this is completed, the regulations apply to the jurisdictional wetland lines, and the other portions of the property are evaluated using the underlying future land use designations.

Contained within the Definition Section of the Future Land Use Element is a detailed description of allowable uses within areas identified as Sensitive Environmental Lands on the Future Land Use Map. These uses are determined by the County to be compatible with wetlands and passive in nature. This section of the Future Land Use Element also describes the previously mentioned process of verification of the jurisdictional lines of wetlands and floodplains, and describes in greater detail the special provisions associated with the Environmentally Sensitive Lands areas.

Zoning

Once the intent of the Future Land Use designation and the application of the Environmentally Sensitive Lands Overlay have been realized, zoning becomes yet another tier of compatibility. The Comprehensive Plan sets forth the long-range potential uses of property in the context of a lawful planning horizon, and provides for a wide array of potential zoning classifications within each future land use designation. The compatibility of zoning districts is generally evaluated using *Exhibit FLU: Compatible Transitional Land Uses*. This application relates only to the future land use designations that are underlying any overlaid designations, such as Environmentally Sensitive Lands. A key point when speculating how zoning is applied, provides that a property owner is not entitled to all zoning classifications or the most potentially dense or intense zoning classification within a future land use designation. Numerous planning, timing, compatibility, public facility, and other generally acceptable planning issues affect the appropriateness of assigning a particular zoning classification or approving a particular future land use designation with regard to a particular parcel of property. *Exhibit FLU: Future Land Use Designations and Allowable Zoning Classifications*, provides a clear picture of the allowable zoning districts per future land use designation. All policies of the Future Land Use Element work to further this goal. FLU Policies 1.1-3.2 specifically address protection of natural resources and compatibility issues, which ultimately affect allowable zoning compatibility. Of importance is to reference previous discussion regarding the portion of the County that does not fall within a special area (within the urban area adjacent to the cities of Altamonte Springs, Casselberry, Winter Springs, and Oviedo). Most of these areas are adjacent to heavily urbanized areas, and the County has designated these areas predominately with the Low Density Residential Future Land Use designation with some having received the Planned Development Future Land Use designation. Planned Development allows for the Planned Development (PD) zoning classification, which encourages clustering. PD zoning is also allowed in other future land use designations, such as Suburban Estates and Low Density Residential to provide for clustering while maintaining the overall allowable density of the underlying future land use designation. These considerations notwithstanding, the Environmentally Sensitive Lands Overlay and process applies in some of these areas, as shown on the Future Land Use Map, as an additional layer of protection.

CONCLUSION

Seminole County continues to be a highly desirable place to work, play, live, and learn through the achievement of redevelopment, compact, mixed-use development, and the preservation of the natural resources upon which the logo "Florida's Natural Choice" is based. The

Comprehensive Plan provides a systematic approach to how the protection of wetlands is achieved, and when applied in accordance with this Plan, these components adequately serve to direct incompatible uses away from all wetlands and preserve the high-quality mosaic of interconnected wetland and upland systems that are of regional significance.

Public School Facilities Element

GOAL

As a basic tenet of community life, it is the goal of Seminole County to contribute to and maintain a high quality public school environment and diverse education system.

OBJECTIVE PSF 1 LEVEL OF SERVICE STANDARDS AND SERVICE BOUNDARIES

The County shall coordinate with the School Board in the School Board's efforts to correct existing deficiencies and address future needs through implementation of adopted level of service standards and appropriate public school facility service area boundaries. The level of service standard is a countywide standard specified in the 2007 Interlocal Agreement for Public School Facility Planning and School Concurrency as Amended January 2008, wherein the following terms are used: Permanent FISH (Florida Inventory of School Houses), meaning the permanent facilities within the inventory of land, buildings and rooms in public educational facilities used by the Florida Department of Education, Office of Educational Facilities; and Level of Service (LOS) Standard, meaning a standard established to measure utilization of capacity within a Concurrency Service Area (CSA). Current LOS within a CSA is determined by dividing the full-time equivalent student count (FTE) for the Fall Semester at the same type of schools by the permanent FISH capacity of the same type of schools. Projected or future LOS is determined by the dividing the projected enrolled students at the same type of schools within a CSA by the planned permanent FISH capacity of the same type of schools.

Policy PSF 1.1 Adoption of Level of Service Standards

To ensure that the capacity of schools is sufficient to support student growth, Seminole County, the cities within the County and the School Board agree that the desired LOS standard shall be 100% of the aggregate permanent FISH capacity for each school type within each Concurrency Service Area (CSA). To financially achieve the desired LOS standard, the following tiered LOS standard is established as follows:

	2008 - 2012	Beginning 2013
Elementary and Middle CSA	100% of Permanent FISH Capacity	100% of Permanent FISH Capacity
High School CSA	110% of Permanent FISH Capacity	100% of Permanent FISH Capacity

Policy PSF 1.2 Use of Level of Service Standards (LOS)

The County shall operate its concurrency management system (CMS) with the input of the School Board regarding compliance with the level of service standard (LOS) that has been established for each type of school in order to ensure that the LOS is maintained.

OBJECTIVE PSF 2 DEVELOPMENT REVIEW COORDINATION TO ACHIEVE CONCURRENCY

The County will coordinate its development review efforts with the Seminole County School Board and the cities to achieve concurrency in all public school facilities serving students who reside in the unincorporated area.

Policy PSF 2.1 Development Review Process

No site plans, final subdivision or functional equivalent shall be approved by the County until a School Capacity Availability Letter (SCALD) has been issued, pursuant to the availability standard specified in Section 163.3180(13)(e), F.S., unless the development has been found exempt from school concurrency.

Policy PSF 2.2 Adoption of School Concurrency Regulations

Seminole County shall adopt school concurrency provisions into its Land Development Code (LDC) consistent with the requirements of the 2007 Interlocal Agreement for Public School Facility Planning and School Concurrency as Amended January 2008, adopted in 2007 and amended in January, 2008.

Intergovernmental Coordination Element

OBJECTIVE IGC 1 COORDINATION OF COMPREHENSIVE PLAN WITH ADJACENT LOCALITIES AND THE SCHOOL BOARD

Seminole County shall coordinate its comprehensive planning programs and activities with the programs and plans of adjacent municipalities and counties and the Seminole County School Board to ensure effective and efficient delivery of public services through implementation of the following policies.

DEPARTMENT OF PUBLIC SAFETY

EMS-FIRE-RESCUE DIVISION



08/08/2016

Tina Williamson, AICP
Development Services Director
Seminole County

Ref: Lake Pickett Development

Ms. Williamson:

Seminole County Fire Department has mutual aid agreements with Orange, Volusia, and Lake Counties as well as first response agreements with the cities of Sanford, Lake Mary, Longwood, Oviedo, and Winter Park. We currently provide Fire-Rescue services throughout unincorporated Seminole County and the cities of Altamonte Springs, Casselberry, and Winter Springs. While the proposed development is in Orange County, we and our joint first response partners would be impacted by this development.

This area is currently covered by a joint Seminole County/Orange County Fire Station (FS 65) located on UCF property and a Fire Station from the City of Oviedo. This joint station (FS 65) is the third busiest in our system so any increase in calls to the area greatly affects not only that station, but our joint response partners as well. There will be an increase in population which typically results in an increase in 911 calls and an increase in traffic in an already congested area so we are bound to see an increase in our call volume and an increase in our response time. Our resources in that particular area of Seminole County are already stretched thin so any additional development will impact SCFD adversely. We are supportive of the growth and the development of Seminole County but with growth, there becomes a need to grow our department as well so we can provide the same level of service to all citizens, visitors, and guests of Seminole County.

If you have any questions, please feel free to contact me.

Sincerely,

Tim Ippolito
Assistant Chief/Fire Marshal
Seminole County Fire Department



CITY OF OVIEDO FLORIDA

400 ALEXANDRIA BLVD • OVIEDO, FLORIDA 32765

407-971-5555 • WWW.CITYOVOVIEDO.NET

May 2, 2016

Honorable Mayor Teresa Jacobs
Honorable S. Scott Boyd, District 1 Commissioner
Honorable Bryan Nelson, District 2 Commissioner
Honorable Pete Clarke, District 3 Commissioner
Honorable Jennifer Thompson, District 4 Commissioner
Honorable Ted Edwards, District 5 Commissioner
Honorable Victoria P. Siplin, District 6 Commissioner

Orange County Government
201 South Rosalind Avenue
Fifth Floor
Orlando, Florida 32801

Subject: Lake Pickett Study Area Development Proposal

Dear Honorable Mayor and County Commissioners:

The City of Oviedo City Council is in full support and agreement with each point of opposition set forth in the Seminole County Board of County Commissioners previous letters submitted and with its most recent letter written on April 19, 2016. The City is in full support and agreement with Seminole County's objections concerning the adverse effects on Seminole County's East Rural Area posed by the contiguous incompatible and uncoordinated urbanization in Orange County; transportation capacity, connectivity and mobility deficits posed by the subject proposal's increased density and associated extension of McCulloch Road across the Econlockhatchee River; and degradation to the surface water quality within Seminole County and in particular, the City of Oviedo.

The City is against any growth and development along the Orange County and Seminole County boarder in this area. The City of Oviedo City Council is also in opposition to the Comprehensive Plan Text Amendments being considered for adoption by Orange County that will ultimately enable the development of the Lake Pickett study area, given the current negative impact and future negative impact it will have on the capacity of the City's transportation network, Oviedo area schools, and the City's recreation and parks programs.

The City will be affected by the Lake Pickett Study development proposal by:

1. Negative traffic impact on the City's transportation network due to the increased traffic to the City's circulation network without required transportation mitigation, affecting

Honorable Orange County Mayor and County Commissioners
May 2, 2016
Page 2 of 2


particularly Lockwood Boulevard, Old Lockwood Boulevard, and Mitchell Hammock Road corridors;

2. The impact the development may have on the schools within the City given the recent bill approved by the Governor releasing school enrolment to be limited to designated school districts;
3. The possible impact the development may have on the capacity of the City's park and recreation programs given the proximity of the City to the proposed development.

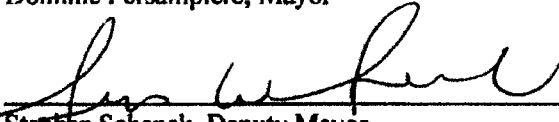
Your consideration of and attention to these important issues that will affect the City of Oviedo, its residents and future generations is most appreciated. We ask you to deny approval of any land use proposal which results in the aforementioned adverse impacts to the City.

Sincerely,

THE CITY OF OVIEDO CITY COUNCIL



Dominic Persampiere, Mayor



Stephen Schenck, Deputy Mayor



Keith Britton, Council Member



Cynthia Drago, Council Member



Steven Henken, Council Member



CITY OF OVIEDO FLORIDA

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August 15, 2016

James Stansbury, Chief, Bureau of Community Planning
Florida Department of Economic Opportunity
107 East Madison Street, MSC 160
Tallahassee, Florida 32399

Subject: Lake Pickett Study Area Development Proposal

Dear Mr. Stansbury:

The City of Oviedo City Council is in full support and agreement with each point of opposition set forth in the Seminole County Board of County Commissioners previous letters submitted and with its most recent letter written on April 19, 2016. The City is in full support and agreement with Seminole County's objections concerning the adverse effects on Seminole County's East Rural Area posed by the contiguous incompatible and uncoordinated urbanization in Orange County; transportation capacity, connectivity and mobility deficits posed by the subject proposal's increased density and associated extension of McCulloch Road across the Econlockhatchee River; and degradation to the surface water quality within Seminole County and in particular, the City of Oviedo.

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The City will be affected by the Lake Pickett Study development proposal by:

1. Negative traffic impact on the City's transportation network due to the increased traffic to the City's circulation network without required transportation mitigation, affecting particularly Lockwood Boulevard, Old Lockwood Boulevard, and Mitchell Hammock Road corridors;
2. The impact the development may have on the schools within the City given the recent bill approved by the Governor releasing school enrolment to be limited to designated school districts;
3. The possible impact the development may have on the capacity of the City's park and recreation programs given the proximity of the City to the proposed development.

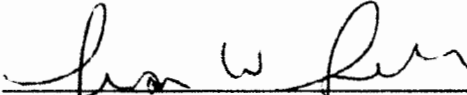
James Stansbury, Chief, Bureau of Community Planning
August 15, 2016
Page 2 of 2

Your consideration of and attention to these important issues that will affect the City of Oviedo, its residents and future generations is most appreciated. We ask you to deny approval of any land use proposal which results in the aforementioned adverse impacts to the City.

Sincerely,
THE CITY OF OVIEDO CITY COUNCIL



Dominic Persampiere, Mayor



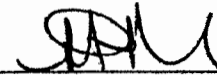
Stephen Schenck, Deputy Mayor



Keith Britton, Council Member



Cynthia Drago, Council Member



Steven Henken, Council Member

From: Peter Henn [<mailto:phenn@sjrwmd.com>]
Sent: Monday, August 08, 2016 10:16 AM
To: Duby, Jim <jduby@seminolecountyfl.gov>; Stolzenberg, Sheryl <SStolzenberg@seminolecountyfl.gov>
Cc: Wharton, William <wwharton@seminolecountyfl.gov>; Hammock, Rebecca <rhammock@seminolecountyfl.gov>; Steven R Miller <srmiller@sjrwmd.com>; Graham Williams <GWilliams@sjrwmd.com>
Subject: RE: Any information on this would be appreciated!

Sheryl

Sorry for the late reply. I was on vacation all last week. The St. Johns River Water Management District manages the Econlockhatchee Sandhills Conservation Area, co-owned with Orange County. Our impacts would be similar to Jim's especially related to prescribed burning. This development would take away an important smoke corridor when necessary to conduct prescribed burns. The extension of McCulloch road would impact this even more.

Peter Henn
Land Management Program Manager
Bureau of Land Resources
St. Johns River Water Management District
Maitland Service Center
601 South Lake Destiny Road, Suite 200 • Maitland, FL 32751
Office: (407) 977-6290 • Cell: (407) 832-0509
Email: phenn@sjrwmd.com
Website: sjrwmd.com
Connect with us: [Newsletter](#), [Facebook](#), [Twitter](#), [YouTube](#)



floridaswater.com/epermitting

From: Duby, Jim [<mailto:jduby@seminolecountyfl.gov>]
Sent: Monday, August 01, 2016 11:34 AM
To: Stolzenberg, Sheryl <SStolzenberg@seminolecountyfl.gov>
Cc: Wharton, William <wwharton@seminolecountyfl.gov>; Hammock, Rebecca <rhammock@seminolecountyfl.gov>; Peter Henn <phenn@sjrwmd.com>
Subject: RE: Any information on this would be appreciated!

Sheryl,

Most of the wildlife issues I could think of would be specific to the site such as loss of habitat for gopher tortoises, fox squirrels etc.... Of course, some species of wildlife undoubtedly use land on both sides of the County line. One such species that comes to mind is the Black bear which have been more frequently observed in Oviedo, UCF and along the Econ River, using it as a corridor. I would assume FWC would or has addressed this in their comments.

Another issue in the management of both our property (Econ River Wilderness Area) and the Districts (Sandhills) is the use of prescribed fire. We are already very restricted by wind direction at ERWA for smoke management and the increased traffic and additional housing to the southeast will further restrict this important management tool.

I would also consult Watershed Management if you haven't already regarding possible water quality impacts to the Econ river and Lake Pickett.

Jim

Jim Duby
Program Manager, Greenways and Natural Lands
Leisure Services Department
Seminole County Government
3485 N. County Rd. 426
Geneva FL 32732
Office (407) 349-0769
Fax (407) 349-9551
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LAKE PICKETT HYDROLOGIC / NUTRIENT BUDGET AND WATER QUALITY MANAGEMENT PLAN EVALUATION

EXHIBIT A: SCOPE OF SERVICES

Revised February 9, 2015

Introduction

As requested by Seminole County and Orange County (County), Environmental Research & Design, Inc. (ERD) has prepared the following Scope of Services to develop a nutrient/hydrologic budget and water quality management plan for Lake Pickett, a 762-acre waterbody. Hydrologic and nutrient budgets will be developed for Lake Pickett to identify significant pollution sources and to provide a ranking of watershed areas with respect to annual mass loadings and areal loadings. The hydrologic budget will include estimated inputs from precipitation, groundwater seepage, stormwater runoff, and baseflow (if present). The nutrient budget will include inputs from bulk precipitation, groundwater seepage, internal recycling, stormwater runoff, and baseflow. A 12-month field monitoring program is proposed to collect data on groundwater seepage, sediment characteristics, and significant inflows. This program will include both dry and wet season conditions and will be used to develop the hydrologic and nutrient budgets. A water quality management plan will be developed to identify specific projects and recommendations designed to maintain and improve water quality in Lake Pickett. The recommendations will include both structural and non-structural activities. Specific work efforts to be performed to achieve these objectives are outlined below.

Environmental Research & Design, Inc. (ERD) shall, at a minimum, perform the following specific tasks for the Lake Pickett project:

1. **Attend project kick-off meeting:** Representatives of ERD will attend a project start-up meeting with representatives of the Orange and Seminole Counties to review the overall project objectives, the scope of services, and the project schedule. Copies of all previous water quality investigations and data, engineering studies, bathymetry, stormsewer maps, and other information related to Lake Pickett and the surrounding watershed areas, will be provided to ERD.
2. **Water quality evaluation and trend analysis:** All available water quality data for Lake Pickett will be entered into a statistical database. In addition to the water quality data provided by Orange and Seminole Counties, ERD will also conduct an independent search and review of historical water quality data collected by other sources. These data will be used, as appropriate, in forming the overall historical water quality data set. Trend analyses will be performed to identify significant water quality trends for typical trophic state indicators (total nitrogen, total phosphorus, chlorophyll-a and Secchi disk depth). Seasonal and horizontal variability in water quality will also be evaluated. The historical water quality data will also be reviewed with respect to Numerical Nutrient Criteria (NNC).

3. **Perform field reconnaissance:** ERD will perform a detailed field reconnaissance of the Lake Pickett drainage basin and contributing stormsewer system. This reconnaissance will be used to visually observe characteristics of the watershed area and to identify specific locations for the inflow monitoring efforts discussed under Task 5. Watershed areas treated by existing stormwater management systems will be identified, and this information will be used in estimation of hydrologic and nutrient inputs from stormwater runoff. Significant inflows to Lake Pickett will be located and referenced by GPS coordinates. ERD will confirm the location of the staff gauge on the west lobe of the lake and record the GPS coordinates. In addition, ERD will identify potential locations for a second staff gauge on the east lobe of Lake Pickett.
4. **Surface water monitoring:** Routine surface water monitoring will be conducted by ERD on a monthly basis at 6 locations in Lake Pickett, as indicated on Figure 1, to evaluate horizontal and vertical variability in water quality characteristics and potential insight on impacts from surface inflows. During each monthly monitoring event, field measurements of pH, temperature, conductivity, dissolved oxygen, and redox potential will be conducted at 0.5-m intervals from the surface to the lake bottom. A measurement of Secchi disk depth will also be conducted at each site during each monitoring event. Standard field conditions and observations will be recorded at each monitoring site.



Figure 1. Surface Water Monitoring Sites in Lake Pickett.

Surface water samples will be collected at each site at a depth equivalent to 50% of the Secchi disk depth and 0.5 m from the lake bottom to assist in identifying ambient water quality characteristics within the lake. A portion of each sample will be field filtered for analysis of dissolved nutrients. Each of the collected lake samples will be analyzed in the ERD Research Laboratory for the following parameters:

- | | |
|---|----------------------------------|
| a. Alkalinity (\$10) | f. Orthophosphorus (SRP) (\$10) |
| b. Ammonia (\$10) | g. Particulate Phosphorus (\$15) |
| c. NO _x (nitrite + nitrate) (\$12) | h. Total Phosphorus (\$15) |
| d. Particulate Nitrogen (\$20) | i. Chlorophyll-a (\$25) |
| e. Total Nitrogen (\$25) | j. Color (\$8) |

The proposed surface water monitoring program will generate a total of 72 surface and 72 bottom samples (12 events x 6 samples/event). The surface samples will include all of the parameters listed above (\$150/sample). The bottom samples will include all parameters except chlorophyll-a (\$125/sample).

5. **Inflow monitoring:** A field monitoring program will be conducted by ERD to evaluate the hydrologic and chemical characteristics of significant inflows/outflows for Lake Pickett. Potential locations for the inflow/outflow monitoring program are indicated on Figure 2, with 5 of the monitoring sites reflecting inflow monitoring sites and 2 reflecting outflows. During each monitoring event, field measurements of discharge will be conducted using the velocity/cross-sectional area method as outlined by USGS. Discharge monitoring will be conducted at each of the 7 sites on a biweekly basis. During events when measurable flow is observed, surface water samples will be collected at each of the 5 sites reflecting inflows to the lake and analyzed in the ERD research laboratory for the following parameters (\$151/sample):

- | | |
|---|--|
| a. pH (\$4.50) | h. Orthophosphorus (SRP) (\$10) |
| b. Specific Conductivity (\$5) | i. Particulate Phosphorus (\$15) |
| c. Alkalinity (\$10) | j. Total Phosphorus (\$15) |
| d. Ammonia (\$10) | k. Total Suspended Solids (TSS) (\$10) |
| e. NO _x (nitrite + nitrate) (\$12) | l. Turbidity (\$6.50) |
| f. Particulate Nitrogen (\$20) | m. Color (\$8) |
| g. Total Nitrogen (\$25) | |

This analysis will assume that the chemical characteristics of discharge from Lake Pickett through Mills Branch and Sicox Branch are similar to the ambient water quality characteristics measured at the adjacent surface water monitoring site. However, this assumption will be verified by collecting outflow samples from Mills Branch and Sicox Branch during the initial 2 surface water monitoring events and comparing with water quality at the adjacent surface water site.

The proposed supplemental monitoring program will assist in establishing hydrologic and nutrient loadings from significant inflows into Lake Pickett. For budget purposes, it is assumed that an average of 15 inflow samples will be collected at each of the 5 inflow monitoring sites, for a total of 75 samples.



Figure 2. Inflow Monitoring Sites In Lake Pickett.

6. **Groundwater Seepage:**

- a. **Installation of seepage meters:** A total of 25 groundwater seepage meters will be installed in Lake Pickett to determine the quality and quantity of shallow groundwater seepage entering the lake. The seepage meters will be installed in shallow and deep areas of the lake and will include a wide range of land use, waste disposal techniques, and topographic characteristics in upland areas adjacent to the seepage meters. Each of the seepage meters will be attached to a floating buoy which clearly identifies the location and purpose of the device. Proposed locations for seepage monitoring sites are indicated on Figure 3.
- b. **Routine monitoring of seepage meters:** Seepage monitoring will be conducted for a period of 12 months. A total of 8 separate collection events will be conducted during the 12-month monitoring program, with samples collected more frequently during wet season conditions and less frequently during dry season conditions. During the initial seepage monitoring event, the volume of seepage will be measured but the sample will be discarded since the seepage sample reflects a combination of seepage plus lake water from the installation of the meter. During each subsequent collection event, the quantity of seepage collected in each seepage meter will be measured, and a sample of the collected seepage will be field-filtered and returned to the ERD laboratory for chemical analysis. Water samples collected from the seepage meters will be analyzed for the following parameters (\$81.50/sample):

- | | | | |
|-----|-----------------------------|-----|-------------------------|
| (1) | pH (\$4.50) | (5) | Total Nitrogen (\$25) |
| (2) | Specific Conductivity (\$5) | (6) | SRP (\$10) |
| (3) | Alkalinity (\$10) | (7) | Total Phosphorus (\$15) |
| (4) | NO _x (\$12) | | |

A maximum of 175 separate seepage samples (25 seepage meters x 7 events) will be collected as part of this task. However, since samples are commonly lost due to damage or vandalism, 160 samples are assumed for budget purposes.



Figure 3. Proposed Locations for Seepage Monitoring Sites in Lake Pickett.

7. **Bathymetric/sediment thickness survey:** Water depth and sediment depth contour maps will be developed for Lake Pickett to quantify the lake volume and the volume and depth of existing organic sediments. ERD will perform simultaneous measurements of water depth and organic sediment depth to hard bottom at a minimum of 300 locations in Lake Pickett. The location of each probe will be determined using a hand-held GPS system. The organic sediment depth information will be used to develop an organic sediment thickness map with 1-ft contours. The total organic sediment volume will be calculated from this contour map.

8. **Sediment collection / characterization:** Lake bottom sediment core sample will be collected at 40 separate sites in Lake Pickett using a 2-inch diameter stainless steel split-spoon core collector. Proposed sediment monitoring sites are shown on Figure 4. Visual characteristics of each sediment core will be recorded, and the 0-10 cm layer of the sediment core will be sectioned off and collected. This layer is collected since prior research has indicated that water quality impacts from lake sediments are limited primarily to the top 10 cm. Each core sample will be placed into a separate sample container and returned to the ERD research laboratory for analysis of the following parameters (\$162/sample):

- | | | | |
|----|----------------------------|----|-------------------------|
| a. | Moisture Content (\$12.50) | d. | Total Phosphorus (\$20) |
| b. | Organic Content (\$12.50) | e. | Total Nitrogen (\$25) |
| c. | Sediment Density (\$10) | f. | pH (\$7) |

Each of the 40 core samples will also be tested using the Chang and Jackson phosphorus speciation technique. This technique divides sediment phosphorus associations into the following categories (\$75/sample):

- a. Soloid Phosphorus
- b. Iron-Bound Phosphorus
- c. Aluminum-Bound Phosphorus



Figure 4. Proposed Sediment Monitoring Sites in Lake Pickett.

9. **Internal recycling evaluation:** Direct measurements of internal recycling of phosphorus under oxic and anoxic conditions will be performed in Lake Pickett by collection of large diameter (4-inch) sediment core samples from various locations within the lake. A total of 6 separate core samples will be collected in Lake Pickett from a variety of water depths and sediment characteristics. Proposed locations will be provided to Orange and Seminole Counties for review. The core samples will be returned to the ERD Laboratory and incubated under both oxic and anoxic conditions. Sediment release of nitrogen and phosphorus will be measured in each column over time. Filtered water samples will be collected from each core chamber every other day for a period of 30 days under both oxic and anoxic conditions. Periodic measurements of redox potential will be conducted in each core chamber to verify oxic and anoxic conditions. The release rate information will be combined with current and historical dissolved oxygen measurements to evaluate phosphorus recycling on a seasonal basis based on the percentage of oxic and anoxic zones within the lake. A total of 144 samples will be collected (6 chambers x 12 samples/chamber x 2 conditions) and analyzed during the testing program for the following parameters (\$72/sample):
- | | |
|--------------------------|----------------------------|
| a. Ammonia (\$10) | d. SRP (\$10) |
| b. NOx (\$12) | e. Total Phosphorus (\$15) |
| c. Total Nitrogen (\$25) | |
10. **Watershed evaluation:** Sub-basin delineations will be developed by ERD for all significant inflows into Lake Pickett. This delineation will be conducted based upon a review of existing drainage basin delineations for Lake Pickett, aerial photography, and available contour elevation data. Physical characteristics of each sub-basin area will be summarized in tabular and graphical formats. Land use characterization data will be developed under existing conditions and under proposed build-out conditions. Build-out conditions will be determined jointly by ERD and Orange and Seminole Counties. In addition, a "baseline" pre-agricultural land use layer will be developed based on historical aerial photography.
11. **Hydrologic modeling:** Estimates of annual runoff inputs to Lake Pickett from each of the contributing watershed areas will be developed using computer modeling techniques. The modeling will be performed using site-specific hydrologic characteristics for each drainage sub-basin area, including basin size, percentage of impervious areas, soil characteristics, and conveyance system types. Estimates of annual runoff inputs to the lake will be generated for each contributing sub-basin area under both existing and the proposed build-out conditions. Estimates of annual runoff inputs will also be generated for the "baseline" conditions.
12. **Develop existing/future/baseline hydrologic budgets:** An existing conditions annual hydrologic budget will be developed for Lake Pickett based upon evaluated inputs from direct precipitation, stormwater runoff, baseflow, and groundwater seepage. Inputs from direct precipitation will be calculated based upon the lake surface area and historical rainfall characteristics for the Central Florida area. Hydrologic inputs from stormwater runoff will be estimated based upon computer modeling of the drainage sub-basin areas. Inputs from groundwater seepage will be estimated based upon the field monitoring program. The results of the hydrologic budget will be presented in both graphical and tabular formats. Hydrologic budget will also be developed for the proposed build-out conditions and the pre-development "baseline" conditions.

13. **Develop existing/future nutrient budgets:** An existing conditions nutrient budget will be developed for Lake Pickett which includes inputs from bulk precipitation, stormwater runoff, baseflow, internal recycling, and groundwater seepage. Inputs from bulk precipitation will be calculated using typical bulk precipitation characteristics for the Central Florida area. Inputs from stormwater runoff will be estimated using typical literature-based values or actual stormwater monitoring data for the Lake Pickett watershed, if available. Phosphorus loading as a result of internal recycling will be calculated based upon the field and laboratory monitoring proposed by ERD. Nutrient inputs from groundwater seepage will be estimated based upon the field monitoring program. The results of the nutrient budget will be presented in both graphical and tabular formats. Nutrient budgets will also be developed for the proposed build-out and pre-development baseline conditions.
14. **Develop water quality model:** A current conditions nutrient limitation water quality model will be developed for Lake Pickett based on the results of the hydrologic and nutrient budgets. The model will be calibrated on an average annual basis using the identified hydrologic and nutrient inputs. The model will be developed in a spreadsheet format which can be used to evaluate changes in water quality resulting from identified retrofit options. The calibrated water quality model will be run using the build-out hydrologic and nutrient budgets as input to evaluate anticipated water quality characteristics at build-out of the watershed. The water quality model will also be used to estimate water quality characteristics in Lake Pickett under pre-development baseline conditions.
15. **Develop management recommendations:** Based on the results of the hydrologic and nutrient budgets, ERD will develop a lake management plan for Lake Pickett. This plan will include both structural and non-structural techniques to maintain and/or improve water quality in the lake. Preliminary conceptual designs, including costs and pollutant removal benefits, will be developed for each evaluated management option. A minimum of two structural options will be developed for the lake. The anticipated water quality improvements achieved by the recommended options will be evaluated using the water quality model developed for the lake. Management recommendations will also be developed to reduce potential water quality impacts from the build-out conditions.
16. **Prepare Draft Final Report:** A Draft Final Report will be prepared which presents the results of the previous tasks. A digital PDF copy of the Draft Final Report will be submitted to the County for review.
17. **Attend review meeting:** Representatives from ERD will attend a review meeting with representatives from the County to discuss the Draft Final Report.
18. **Prepare Final Report:** After receiving comments from the County, a Final Report will be prepared for the project. Six hard copies and one digital copy (pdf format) of the Final Report will be submitted to the County.

The Final Report submittal will also include, but not be limited to, the following:

- a. Digital copies of field and lab quality control/quality assurance data, chain-of-custody forms, field sheets containing parameters recorded in the field, and copies of field notes and log books
 - b. Digital copies of all spreadsheets used in conjunction with the analyses contained in the report
 - c. Digital copies of all databases and GIS-layer files used in conjunction with the report
19. **Prepare/give presentation of results:** The ERD Project Director will prepare and give a presentation of the results of the study to the HOA.

Project Schedule

A proposed project schedule is attached.

Project Budget

A project budget is attached which outlines the man-hours and fees for the proposed work efforts. Fees are also included for laboratory analyses and reimbursable expenses.



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LAKE PICKETT HYDROLOGIC / NUTRIENT BUDGET AND WATER QUALITY MANAGEMENT PLAN EVALUATION

EXHIBIT B: MAN-HOURS / FEE SUMMARY

Revised February 9, 2015

A. Labor

TASK	DESCRIPTION	MAN-HOURS*							TASK AMOUNT (\$)
		PD	SE	LM	FT	CH	D	CL	
1	Project Kick-off Meeting	3	-	-	-	-	-	-	\$ 442.86
2	Water Quality Evaluation & Trend Analysis	6	8	16	-	-	-	-	2,544.92
3	Perform Field Reconnaissance	6	-	8	18	-	-	-	2,249.70
4	Routine Surface Water Monitoring	4	-	12	96	-	-	-	6,099.56
5	Tributary Inflow Monitoring	4	-	12	78	-	-	-	5,196.14
6	Groundwater Seepage								
	a. Seepage Meter Preparation/Installation	8	-	4	24	-	-	-	2,615.80
	b. Routine Monitoring & Sample Collection	4	-	14	96	-	-	-	6,214.70
7	Bathymetric/Sediment Thickness Survey	2	-	4	32	-	12	-	2,840.56
8	Sediment Collection/Characterization	2	-	4	24	40	-	2	3,944.80
9	Internal Recycling Evaluation	4	4	24	96	-	-	-	7,159.44
10	Watershed Evaluation	8	48	-	-	-	-	-	5,609.44
11	Runoff Modeling and Estimation	8	36	-	-	-	4	-	4,738.64
12	Develop Existing/Future/Pre Hydrologic Budgets	4	24	-	-	-	4	-	3,041.04
13	Develop Existing/Future/Pre Nutrient Budgets	8	30	-	-	-	4	-	4,185.08
14	Develop Existing/Future/Pre Water Quality Models	18	4	-	-	-	4	-	3,262.52
15	Develop Management Recommendations	36	32	-	-	-	32	-	10,157.20
16	Prepare Draft Final Report	40	16	24	-	-	6	24	10,215.36
17	Review Meeting	4	-	-	-	-	-	-	590.48
18	Prepare Final Report	12	8	4	-	-	4	8	3,342.20
19	Prepare/Give Presentation of Results	12	2	-	-	-	-	6	2,230.52
TOTAL - LABOR:		193	212	126	464	40	70	40	\$ 86,680.96

B. Laboratory Expenses

TASK	DESCRIPTION	TASK AMOUNT (\$)
4	a. Surface Water Samples - Top (6 samples/month x 12 months @ \$150/sample)	\$ 10,800.00
	b. Surface Water Samples - Bottom (6 samples/month x 12 months @ \$125/sample)	9,000.00
5	Inflow Water Samples (75 samples @ \$151/sample)	11,325.00
6	Groundwater Seepage (160 samples x \$81.50/sample)	13,040.00
8	Sediment Analyses (40 samples x \$162/sample)	6,480.00
9	Internal Recycling Analyses (6 core samples x 24 samples/core \$72/sample)	10,368.00
TOTAL - LABORATORY EXPENSES		\$ 61,013.00

C. Reimbursable Expenses

TASK	DESCRIPTION	TASK AMOUNT (\$)
18	Copies (B/W @ \$0.05/copy; color @ \$1.00/copy; binders, tabs, etc. @ cost)	\$ 500.00
6	Seepage meter fabrication/preparation/rental (25 seepage meters @ \$125/meter)	3,125.00
9	Recycling evaluation supplies (Large diameter sediment core cylinders, gases, supplies, etc.; 6 core tubes x \$200/tube)	1,200.00
-	Mileage (1500 miles @ \$0.40/mile)	600.00
TOTAL - REIMBURSABLE EXPENSES		\$ 5,425.00

PROJECT TOTAL: \$ 153,118.96

***Personnel Hourly Rates**

SYMBOL	LABOR CATEGORY	HOURLY RATE (\$/hr)
PD	Project Director	147.62
PE	Senior Project Engineer	92.26
LM	Limnologist	57.57
FT	Field Technician	50.19
CH	Chemist	53.08
D	Draftsman	59.08
CL	Clerical	45.76



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LAKE PICKETT HYDROLOGIC / NUTRIENT BUDGET AND WATER QUALITY MANAGEMENT PLAN EVALUATION

EXHIBIT C: PROPOSED PROJECT SCHEDULE

Revised February 9, 2015

TASK	DESCRIPTION	2015												2016												2017			
		M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	J	F	M	A
1	Project Kick-off Meeting	*																											
2	Water Quality Evaluation & Trend Analysis																												
3	Perform Field Reconnaissance																												
4	Routine Surface Water Monitoring																												
5	Tributary Inflow Monitoring																												
6	Groundwater Seepage																												
	a. Seepage Meter Preparation/Installation																												
	b. Routine Monitoring & Sample Collection																												
7	Bathymetric/Sediment Thickness Survey																												
8	Sediment Collection/Characterization																												
9	Internal Recycling Evaluation																												
10	Watershed Evaluation																												
11	Runoff Modeling and Estimation																												
12	Develop Existing/Future/Pre Hydrologic Budgets																												
13	Develop Existing/Future/Pre Nutrient Budgets																												
14	Develop Existing/Future/Pre Water Quality Models																												
15	Develop Management Recommendations																												
16	Prepare Draft Final Report																												
17	Review Meeting																												
18	Prepare Final Report																												
19	Prepare/Give Presentation of Results																												



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July 5, 2016

Ms. Gloria Eby
Watershed Management Division
Seminole County Public Works
200 W. County Home Road
Sanford, FL 32773

RE: Progress Report #8 for the Lake Pickett Nutrient Study for the Period From May 1-June 30, 2016 –
Work Order No. 14 for Master Agreement PS-2051-07/BHJ

Dear Gloria:

Work efforts were continued by Environmental Research & Design, Inc. (ERD) for Seminole County (County) on the Lake Pickett Nutrient Study during the above-referenced period. The status of each specific work effort outlined for this project is summarized below.

A. Labor

1. Attend project kick-off meeting/site visit: Work efforts outlined under this task were 100% complete as of Progress Report #1.
2. Water quality evaluation and trend analysis: No work efforts have been conducted under this task at this time.
3. Perform field reconnaissance: Work efforts outlined under this task were 100% complete as of Progress Report #1.
4. Routine surface water monitoring: The 10th and 11th monthly surface water monitoring events were conducted at 6 sites in Lake Pickett during May and June. Vertical field profiles of temperature, pH, dissolved oxygen, conductivity, and ORP were conducted at the water surface and at 0.5 m intervals to the lake bottom at each site. In addition, a measurement of Secchi disk depth was conducted at each of the 6 sites. Surface water samples were collected at each of the 6 sites at a depth equivalent to 50% of the Secchi disk depth (top) and approximately 0.5 m from the lake bottom (bottom) and returned to the ERD Laboratory for analysis of required parameters. Work efforts outlined under this task are approximately 92% complete at this time (11 of 12 events).
5. Tributary inflow monitoring: Tributary inflow monitoring at each of the identified inflow and outflow monitoring locations for Lake Pickett was continued during May and June. Tributary monitoring events were conducted on 2 separate occasions during May, with samples collected at 4 of the 7 sites on May 9th and at 4 of the 7 sites on May 18th. Tributary monitoring events were conducted on 2 separate occasions during June, with samples collected at 4 of the 7 sites on June 8th and at 4 of the 7 sites on June 30th. Field measurements of tributary discharge were conducted during each field monitoring event, and a grab sample was collected for analysis in the ERD Laboratory. Work efforts outlined under this task are approximately 83% complete at this time (10 of 12 months).

6. **Groundwater seepage:**
 - a. **Seepage meter preparation/installation:** Work efforts outlined under this task were 100% complete as of Progress Report #1.
 - b. **Routine monitoring/sample collection:** The 5th and 6th seepage monitoring events were conducted at each of the 25 sites during May and June. During each event, seepage volume was measured, and samples were field filtered and collected for lab analysis of seepage characteristics. Seepage samples were collected at 24 of the 25 sites during May and at 24 of the 25 sites during June. Work efforts outlined under this task are approximately 75% complete at this time (6 of 8 events).
7. **Bathymetric/sediment thickness survey:** Work efforts outlined under this task were 100% complete as of Progress Report #4.
8. **Sediment collection/characterization:** Work efforts outlined under this task were 100% complete as of Progress Report #4.
9. **Internal recycling evaluation:** Incubation of large core samples for evaluation of recycling rates was conducted during May and June. Each of the 6 large core samples was incubated under aerobic conditions for a period of 32 days and under anoxic conditions for a period of 32 days. Work efforts outlined under this task are now 100% complete.
10. **Watershed evaluation:** No work efforts have been conducted under this task at this time.
11. **Runoff modeling and estimation:** No work efforts have been conducted under this task at this time.
12. **Develop existing/future/pre-hydrologic budgets:** No work efforts have been conducted under this task at this time.
13. **Develop existing/future/pre-nutrient budgets:** No work efforts have been conducted under this task at this time.
14. **Develop existing/future/pre-water quality models:** No work efforts have been conducted under this task at this time.
15. **Develop management recommendations:** No work efforts have been conducted under this task at this time.
16. **Prepare Draft Final Report:** No work efforts have been conducted under this task at this time.
17. **Review meeting:** No work efforts have been conducted under this task at this time.
18. **Prepare Final Report:** No work efforts have been conducted under this task at this time.
19. **Prepare/give presentation of results:** No work efforts have been conducted under this task at this time.

B. Laboratory Expenses

A summary of samples collected for laboratory analyses during May and June are summarized below:

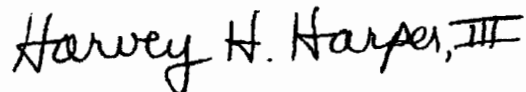
PARAMETER	NUMBER OF SAMPLES COLLECTED THIS PERIOD		TOTAL NUMBER OF SAMPLES COLLECTED TO DATE	
	Top:		Top:	
Surface Water	Bottom:	12	Bottom:	66
Inflow/Outflow		12		66
Seepage		16		79
Sediments		48		118
Internal Recycling		0		40
		144		144

C. Reimbursable Expenses

Reimbursable expenses were incurred for mileage for the various monitoring events conducted during April-June and supplies for the internal recycling evaluations.

Thank you for the opportunity of providing water quality engineering services to Seminole County.

Sincerely,



Harvey H. Harper, Ph.D., P.E.
President