Additional Attachment #30 for the Joint Public Hearing - Agenda Item #1 Meeting of Tuesday, June 14, 2022

PUBLIC HEARING:

1. Joint Adoption Public Hearing on 2022 Cycle Comprehensive Plan Amendments
(County Administrator/ PLACE/ Planning)

Attachment #30 provides additional citizen comments received after the agenda was published.

This document distributed June 14, 2022.

Additional Citizen Comments Received as of June 13, 2022

Board of Directors

Rob Williams, Chair Apalachee Audubon

Robert Deyle, Vice Chair Professor Emeritus, FSU

Jim Davis, Treasurer Retired Exec Director, Sustainable Tallahassee

Tom Taylor, Secretary FSU Adjunct Faculty and Private Consultant

Gail Fishman Writer

Rob Gelhardt Gelhardt Graphics

Albert Gregory
Retired, Department of
Environmental Protection

Andreas Hagberg Global Underwater Explorers

Cal Jamison Wakulla Soil & Water Conservation District

Howard Kessler, MD Physicians for Social Responsibility Florida

Michael Keys Wildlife Biologist

Debbie LightseyFormer Tallahassee City
Commissioner

Brian Lupiani Springs Research Volunteer

Lindsey Stevens, AICP

Wakulla Springs Alliance

"Protecting and restoring water quality, spring flow and ecological health of Wakulla Spring"

June 13, 2022

Dear Mayor Dailey:

The Wakulla Springs Alliance Board urges you to vote against adopting the proposed amendments to the Urban Services Area (LTA202201) for the Woodville Highway east parcel (#31302000200000) and the Southwood Plantation Road parcel (#3102204130000) and the proposed future land use and zoning classification changes for the Woodville Highway east parcel (LMA202202) and the Southwood Plantation Road parcel (LMA 202203) sought by D.R. Horton, Inc.

The proposed changes are not consistent with the governing objectives and policies of the Land Use element of the Comprehensive Plan. They also would allow increased development densities in areas not served by central sewer thereby unnecessarily adding to the nitrogen pollution of the aquifer that feeds Wakulla Spring.

The reasoning relied upon by staff to justify these Urban Services Area (USA) expansions and accompanying future land use and zoning map classifications turns logic on its head.

- The staff report states that "The applicant proposes that this Urban Services Area expansion will allow limited development to occur on the constrained portions of the parcel, where existing road and infrastructure already exist." In fact, full infrastructure access does not exist on two of the three parcels for which USA expansion is proposed:
 - o The 82.01-acre Woodville Highway east parcel has access to Capital Circle SE but no central sewer access. It is not clear from the staff report if the parcel has access to public water.
 - o The western 22.01-acre portion of the Southwood Plantation Road parcel has access to Southwood Plantation Road and is within the USA but does not have access to water or central sewer. The remaining 107.79-acre eastern portion is outside the USA and has no access to any public infrastructure.
- Staff argues that expanding the USA to include these properties supports objectives and policies that call for restricting development to the USA to
- o "have Tallahassee and Leon County grow in a responsible manner, with infrastructure provided economically and efficiently, and surrounding forest

and agricultural lands protected from unwarranted and premature conversion to urban land use" (Objective 1.1 [L])

- o "discourage urban sprawl" (Policy 1.1.1 [L])
- o "guide and coordinate land use densities and intensities with the availability of capital infrastructure and to discourage urban sprawl" (Policy 1.1.11 [L])

This reasoning is inside out. Expanding the USA so that proposed development will be within it, especially where one or more of the three principal urban infrastructure services (roads, water, and sewer) are not available, is in fact inconsistent with these objectives and policies: Their intent is for the USA to guide the location of development rather than for proposed development to guide the location of the USA.

- Staff also justifies these expansions with the fatuous argument that the properties are not suited to be classified as "Rural" land use because the presence of road access contravenes Policy 2.1.1[L] which "indicates that urban services are not planned or programmed for lands in the Rural future land use category." By this logic, only properties without road access should be classified as Rural future land use. Staff ignores the absence of water and/or sewer services on the east Woodville Highway and Southwood Plantation Road parcels.
- The staff analysis fails to demonstrate any need to expand the USA to accommodate future growth within the 20-year planning horizon of the comprehensive plan. The staff report (p. 3) misquotes Objective 1.1 [L] leaving out the planning horizon time frame. The full text reads as follows:

"The location and size of the USA shall be depicted on the Future Land Use Map and is based upon the area necessary to accommodate 90% of new residential dwelling units within the County by the Plan Horizon . . ."

Prior to the Welaunee USA expansion Dr. Pam Hall demonstrated that there was still more than sufficient land available within the applicable planning horizon. With the Welaunee USA expansion, there is likely enough developable land already inside the USA for the next 45 years.

Expanding the USA and amending the applicable future land use and zoning classifications to allow higher development densities in areas not served by sewer will negatively affect Wakulla Springs. Doing so will increase nitrogen pollution of ground water via septic systems that provide minimal nitrogen removal compared to the T. P. Smith Water Reclamation Facility which treats wastewater from sewered properties.

For these reasons, the Alliance Board urges you to vote against adopting the proposed USA expansions and future land use and zoning changes for the east Woodville Road parcel and the Southwood Plantation Road parcel. Please let me know if you have any questions concerning our recommendations.

Sincerely,

Robert A. Williams, Chair

cc: Reese Goad, City Manager Artie White, Planning Director

Robert a. William



June 10, 2022

The Alliance of Tallahassee Neighborhoods (ATN) is requesting denial for Text Amendment LTA 2022-01, and Large-Scale Map Amendments LMA 2022-01, 2022-02, and 2022-03.

Action on these amendments should be denied or delayed until these analyses are completed. The information staff has supplied in support of Approval is inadequate.

Staff does not provide vital analyses and data in support of their recommendation for approval of these amendments, including:

- A. Population growth/available developable land inside the USA,
- B. Roadway capacity, and
- C. Costs to the public to provide infrastructure and services

<u>LTA 2022-01</u> Text Amendment – Urban Services Area (USA) Expansion Current Owner – St. Joe Applicant – D. R. Horton 3 parcels:

134.9 acres Northeast quadrant: Old St. Augustine Road and April Road
62.0 acres Intersection Capital Circle Southwest and Woodville Highway
107.8 acres Between Apalachee Parkway and Old St. Augustine Road

ATN requests Denial.

These amendments are inconsistent with several comprehensive plan Land Use policies. Adoption of them violates the fundamental Land Use Plan criterion of not approving expansion of the USA until there is inadequate developable land to accommodate 90 % of the projected population in the Plan timeframe (20 years). Prior to the Welaunee USA expansion, Dr. Pam Hall's analysis showed there was still more than sufficient land available. Post Welaunee there is likely enough developable land already inside the USA for the next 45 years. Staff cites the governing formula, but provides no data to support the need for expansion.

Other Land Use plan policies about containing urban sprawl, maintaining the rural character of land outside the USA, and provision of adequate infrastructure are not met on these parcels.

LMA 2022-01 2022-02 2022-03 Large- Scale Map Amendments Current Owner – St. Joe Applicant – D. R. Horton

3 parcels:

01 - April Road Old St. Augustine Road174 acresRural & Suburban to R3**02** - Woodville Highway154 acresPUD & Rural to Suburban

03 - Southwood Plantation 129.85 acres **Rural** to Suburban

ATN requests Denial.

This is a mixed group of parcels-- some inside the city and inside the USA, some partially inside the USA, some in the City's Water & Sewer territory, others without water and sewer. Some of these parcels are covered in the Text Amendment (USA Expansion). They should not have been grouped as if the same Plan policies apply equally to all. This grouping causes confusion and gives the impression that all of them satisfy relevant Plan policies.

The Amendments which require expansion of the USA Boundary should be removed from consideration in the Map Amendment, as discussed above.

The remaining ones when evaluated on availability of essential infrastructure fail the test. Staff references available roadway access while ignoring other considerations, such as ack of water and sewer to some parcels.

There are existing Plan policies about containing urban sprawl and maintaining Rural properties for agriculture, silviculture, and associated uses with very low density residential allowed - 1 du/10 acres. These amendments prematurely open large acreage for development with higher density sprawled residential and commercial uses.

Cc: Mohrman, Melinda; White, Artie

Subject: Citizen comment on proposed Urban Services Area Amendment (LTA202201)

Date: Thursday, June 9, 2022 11:56:13 AM

Citizen comment on proposed Urban Services Area Amendment (LTA202201)

Cc: Mohrman, Melinda; White, Artie

Subject: Citizen comment on proposed April Road Amendment (LMA202201)

Date: Thursday, June 9, 2022 11:54:10 AM

Citizen comment on proposed April Road Amendment (LMA202201)

Cc: Mohrman, Melinda; White, Artie

Subject: Citizen comment on proposed Woodville Highway Amendment (LMA202202)

Date: Thursday, June 9, 2022 11:55:13 AM

Citizen comment on proposed Woodville Highway Amendment (LMA202202)

Cc: Mohrman, Melinda; White, Artie

Subject: Citizen comment on proposed Southwood Plantation Road Amendment (LTA202203)

Date: Thursday, June 9, 2022 11:56:58 AM

Citizen comment on proposed Southwood Plantation Road Amendment (LTA202203)

 From:
 Akinrinde, Oluwaseyi

 To:
 cindy.elliott09@comcast.net

 Cc:
 Mohrman, Melinda; Calhoun, Sherri

Subject: RE: Citizen comment on proposed Southwood Plantation Road Amendment (LTA202203)

Date: Monday, May 23, 2022 10:55:15 AM

Attachments: <u>image001.png</u>

Good Morning Cindy,

Thank you for your comments on the proposed Southwood Plantation Road Amendment. Your comment will be saved and provided to the Board of Commissioners for consideration at the upcoming public hearing. You can find the date for the meeting at the link provided below.

To answer your question, there is a concurrent rezoning from Rural (R) and Critical Planning Area (CPA) to Single Family Detached and Attached Two Family Residential (R-3) zoning with the proposed amendment. If this amendment is approved, the applicant will be required to follow the development standards of the R-3 zoning district at the site planning stage of the development process. You can find the development standards for the R-3 zoning district here: Community Gardens (talgov.com). Depending on the proposed use category, the minimum building setbacks in the development standards will guide the buffer distance between the Twin Lakes Circle residence and the proposed development.

The applicant will proceed through the site planning and permit review process with Leon County Development Support and Environmental Management (DSEM) if the amendment is approved. At this time, the applicant will be required to provide a traffic study and meet all stormwater and environmental management requirements. After that, the site plan and permitting are reviewed by DSEM and will come later in the process if the Board approves this amendment.

Again, thank you very much for your participation in this process, and please let us know if you have questions or would like additional information.

Planning | Comprehensive Plan | 2022 Comprehensive Plan Amendment Cycle | PLACE (talgov.com)

Regards,

Oluwaseyi Akinrinde

Planner I | Comprehensive Planning

Tallahassee-Leon County Planning Dept. Frenchtown Renaissance Center, Third Floor 435 N Macomb St.

Tallahassee Fl, 32309

850.891.6412 • oluwaseyi.akinrinde@talgov.com



Please note that under Florida's Public Records laws, most written

communications to or from city and county staff or officials regarding public business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.

From: Calhoun, Sherri < Sherri.Calhoun@talgov.com>

Sent: Monday, May 23, 2022 6:27 AM

To: cindy.elliott09@comcast.net; Planning Inquiries <planning@talgov.com>; Akinrinde, Oluwaseyi <Oluwaseyi.Akinrinde@talgov.com>

Cc: Mohrman, Melinda <Melinda.Mohrman@talgov.com>; White, Artie <Artie.White@talgov.com> **Subject:** RE: Citizen comment on proposed Southwood Plantation Road Amendment (LTA202203)

Hello Cindy,

I will forward this to our planner working on the project.

Thank you,

Sherri Calhoun
Tallahassee Leon County Planning Department
850-891-6400

From: <u>cindy.elliott09@comcast.net</u> < <u>cindy.elliott09@comcast.net</u>>

Sent: Saturday, May 21, 2022 11:19 AM

To: Planning Inquiries <<u>planning@talgov.com</u>>

Cc: Mohrman, Melinda < Melinda < Melinda < Melinda < Melinda < Melinda.Mohrman@talgov.com> **Subject:** Citizen comment on proposed Southwood Plantation Road Amendment (LTA202203)

Citizen comment on proposed Southwood Plantation Road Amendment (LTA202203)

I live in the back of Twin Lakes Circle where it appears we share a property line with the proposed development. Can someone give me an idea of the buffer distance that will be in place behind the Twin Lakes Circle residence and what that will look like? Thank you.

Cindy Elliott 1532 Twin Lakes Circle Tallahassee FL 32311 cindy.elliott09@comcast.net