

SOUTHWOOD
PRESERVE
Naturally

Southwood Preserve DRI (f/k/a Elkton DRI)

Application for Development Approval
Second Sufficiency Response

November 2, 2007



SOUTHWOOD P R E S E R V E

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Applicant's General Comment: Since the last sufficiency, the project has responded to comments received through this DRI process. As a whole, the development remains as previously proposed, however re-structuring of development criteria has occurred as follows:

- The total number of residential units remains at 3,600 dwelling units, however the distribution has changed from the originally proposed 650 active adult units to 1,600 active adult units and from the originally proposed 2,950 primary residential units to 2,000 units.
- The amount of industrial square footage is increasing from 70,000 sf as originally proposed to 505,000 s.f.
- The location of the schools and parks within the site have moved in response to the above changes.
- The name of the project has been changed from the Elkton DRI to the Southwood Preserve DRI.
- The library site was previously proposed to be on site, however, this project is not dictating this requirement as the actual location needs to be determined by a regional "Needs Assessment" by the library district.
- The Southwood Preserve DRI has proposed a mitigation plan where a majority of the project's proportionate share dollars would be applied to the planning, engineering, permitting and re-construction of the I-95 / SR 207 Interchange.

NEFRC Comments

Question 10 – General Project Description

In our first sufficiency, NEFRC wrote: *Generally, the DRI describes the project as a community based on small-town USA with a nod to some tenets of Traditional Neighborhood Design...Map H, however, does not appear to substantiate these ideals. What performance and development standards and/or development criteria are going to be included within the zoning of the development to ensure that the DRI is consistent with the description contained within the ADA, including the inclusion of a "Main Street?"* Staff reiterates this concern, and adds the following comment: Revised Map H dated December 20, 2006, identifies two (2) "Village Centers" that, according to text on Map H, will be for residential, commercial, civic and recreation. However, neither the conceptual site plan for Phase 1 of the DRI nor the proposed land use designations identified on Map D-2 seem to support this. Please explain.

Applicant's Response: Map H accurately reflects the integration necessary for Traditional Neighborhood Design as described within the ADA and first sufficiency responses. The town center will include a "Main Street" that serves as the core service area for the community, including this community and the Elkton/Hastings area at large. Commercial, office, industrial, residential and recreational uses will all co-exist within this town center core. One of the two village centers is contiguous to the town center and through

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higher residential densities, provides critical mass to directly support the town center. The other village center is positioned within the core of the community in context to the schools and parks systems. As is in Hastings, historic St. Augustine and other traditional communities, these town and village centers become the center to the community from which the residential housing grows out of or between.

A preliminary site plan will be provided to further support these verbal descriptions during the zoning process for the project. However, general design criteria shall include a compact town center nucleus, with appropriately scaled commercial development, including integrated civic uses, street-edge buildings, a mixture of office and retail uses oriented towards providing basic community services such as grocery stores, drugstores, banks, doctors' offices, dry cleaners, restaurants, as well as public buildings such as schools, postal services, police and fire stations, houses of worship and other key community focal points. In addition, the Southwood Preserve DRI will provide for a range of housing options for the local community, including a vibrant active adult community, as well as attainable single-family residential homes, all in a pattern of compact rural villages rather than a diffuse pattern of isolated large lot subdivisions lacking in support services and infrastructure.

The industrial amounts proposed seem inconsistent with the minimum requirements of the MU land use category as identified in the Comprehensive Plan for St. Johns County. Please confirm that the proposed mixed-use development contains percentages for residential and non-residential development consistent with the St. Johns County Comprehensive Plan.

Applicant's Response: St. Johns County Policy A.1.9.3 contains the following goals for development within the MU land use category: 45% Commercial, 25% Industrial, 20% Residential, and 10% Recreation/Open Space. Policy A.1.9.4 provides that, "Development parcels within Mixed Use Districts equal to or greater than forty (40) acres in size *shall be required to have Recreation/Open Space and at least two of the other three land use categories listed above (Commercial, Light Industrial, Residential) at a level equal to or greater than the mixed use percentages contained in Policy A.1.9.3.*"

The 92.4-acre MU portion of the Southwood Preserve DRI (f/k/a Elkton) site will contain the following mixture of uses:

- 9.4 Acres Recreation/Open Space (10%)
- 42.0 Acres Commercial (Retail + Office) (45%)
- 30.2 Acres Residential (33%)
- 10.8 Acres Industrial (12%)

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Question 11 – Revenue Generation Summary

Staff remains unable to replicate the fiscal impacts, which is caused by an incomplete FIAM model. Please provide the populated FIAM model utilized for this development.

Applicant's Response: It is not our policy to provide fully functional versions of our models. We have attached all of the FIAM assumptions and data used in this model as Tab B. The equations are the same as those used in the FIAM models approved by DCA.

Question 21 – Transportation

Please ensure that all future background traffic counts, including intersection counts, show an increase from existing volumes. Staff review notes that several intersection volumes in 2021 less than existing volumes.

Applicant's Response: The general assumption that background traffic should increase on all roadway segments in the future is incorrect. Network and facility type changes will potentially divert trips from existing roadways to more attractive and less constrained facilities in the future. The 2021 future model run indicates that with the inclusion of S.R. 312, a substantial amount of trips will be diverted away from segments along U.S. 1 and portions of S.R. 207, as indicated in the Future Conditions Table 21-7, included as part of Tab C. Further, proportionate share mitigation shall be limited to ensure that a development of regional impact meeting the requirements of Ch. 163.3180(12), Florida Statutes, mitigates its impact on the transportation system, but is not responsible for the additional cost of reducing or eliminating backlogs.

Please adjust all proportionate share calculations to show most updates FDOT cost information.

Applicant's Response: The applicant has adjusted the calculations to reflect the 2006 FDOT Transportation Costs as shown in Tab C.

Staff believes that a critical roadway improvement that will be necessary for a commitment of proportionate share dollars will be the I-95/S.R. 207 interchange.

Applicant's Response: Acknowledged. The applicant intends to direct a significant portion of the mitigation dollars to the I-95/S.R. 207 interchange.

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Question 27 – Education

Please include documentation of ongoing discussions with the School Board in the second sufficiency response. We recommend that agreement be reached with the School Board prior to submittal of that response.

Applicant's Response: The Applicant has continued to meet with representative of the St. Johns County School Board and last met on September 11th, 2007. At that time a draft concurrency model was presented by the School Board Staff with general approval by both parties. There were questions/clarifications asked that continue to be worked through so this draft document can be mutually agreed upon. At this time, both parties agree to the following:

- Student generation methodology and numbers.
- The Active Adult component of the development will be deed restricted, therefore not contributing children towards the schools.
- The development will set aside three school sites, one for an elementary school, one for a middle school and one for a high school at sizes acceptable to the School Board for the future construction of the schools. The agreed locations are accurately reflected on map H.
- Impact fee credit will be received for contribution of the land in the amount above and beyond the developments impact portion.
- To continue to work through the draft concurrency model that establishes the developments impact fee/mitigation criteria.

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St. Johns County

CONCURRENCY/TRANSPORTATION PLANNING

4. The model project traffic distribution does not seem reasonable in several respects, please explain:

- A. No project trips utilize SR 206 to reach I-95 south but use a longer path via SR 207
- B. Project trips use CR 305 and SR 206 to/from the southwest instead of the shorter SR 207 path
- C. More trips on SR 207 to/from the northeast use SR 207 rather than SR 312. This is contrary to existing traffic patterns where most of the trips are using SR 312. Please explain.
- D. Traffic distribution to/from I-95 north of SR 207 decreases in Phase 3. Please explain.

1/30/2007

Review of revised traffic distribution indicates an overall acceptable traffic distribution except for the following:

- A. Site traffic needs to be hand adjusted based on project access and the distribution of trips to the TAZ's. A quick check indicates that approximately 30% of the project trips are assigned to project TAZ 1362 at build-out and 70% to project TAZ 1361. This would indicate more trips on SR 207 segments from CR 305 to the eastern project entrance.

Applicant's Response: The location of TAZ 1361 relative to SR 207 and the predominantly residential uses representing this zone, indicate that more trips are actually entering/exiting SR 207 to/from the eastern project entrance to I-95. The screen line exercise also substantiates this pattern, as only 10-15% of the project traffic is assigned by the model from CR 305 to the eastern project entrance, while 77% is assigned from the eastern project entrance to Vermont Blvd. Based upon the shorter distance to the east from zone 1361, the majority of trips would not utilize CR 305 to access SR 207 to travel east to I-95.

In addition, the proposed Southwood Preserve (f/k/a Elkton) site includes internal roadway connections providing interconnectivity between the residential neighborhoods and the town center, thereby eliminating the need for much of the home-based shopping traffic to access CR 305 or SR 207.

- B. The project traffic distribution to/from TAZ's 1366 and 1369 is not reasonable and needs to be hand-adjusted. The only development in TAZ 1366 is the development north of SR 207 between Vermont Blvd and I-95 (Vermont Heights and the St. Augustine Industrial Park) while the model is loading 100% of the project traffic to/from this zone to CR 305 north of SR 207 where there is no development now or anticipated. Similarly, the model is loading 100% of the traffic for TAZ 1369 to CR 305 south of Elkton, where there is no development now or anticipated. All of the development in this zone is on SR

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207 between Vermont Heights and Cypress Links Blvd (Cypress Links and Coquina Crossing). The project traffic to/from these zones should be hand assigned to SR 207 between the project and Cypress Links Blvd (107.1 and 107.2).

Applicant's Response: The County provided the "Southwest St. Johns County Development Table", dated 11/13/2006, for the purpose of including additional development data not currently represented by the existing TAZ's for the Southwood Preserve (formerly "Elkton") modeling effort. In addition to Vermont Heights and the St. Augustine Industrial Park, there are other developments in these zones which would attract project trips. These include the St. Augustine 500,000 S.F. warehouse (CONMAJ 2005-31), and the Graham & Company Distribution Center PUD (CONMAJ 2006-24) both located in TAZ 1366. The County's table, however, incorrectly identifies the location of these developments in 1369. The proposed Graham Westchester SF PUD is also in TAZ 1366, across the street from Southwood Preserve (formerly "Elkton"), north of SR 207 near CR 305. Furthermore, the interpolated 2021 model network contemplates future single family development in TAZ 1369, with 1438 units per the ZDATA 1.25A file. Keep in mind that the position of TAZ's and the corresponding centroid connectors do not necessarily reflect the actual location of each and every driveway connection in the region, nor are they intended to do so. Each serves merely as an approximate representation of where development is located or is expected to be located in the future. Moving and/or deleting these zones and corresponding connectors based on current development patterns is an unreasonable manipulation which may serve to invalidate the NERPM model.

5. Capacity analyses for the site entrance intersections should be included in the report, along with volumes and enter/exit distributions. Staff is concerned that these site driveways will require signalization, thus requiring a change in the classification of SR 207 from uninterrupted flow to interrupted flow. If signals are required, then interrupted flow should be used.

1/30/2007

Analysis requested was not provided. Please provide project assignment to driveways and analysis as requested accounting for distribution adjustments in revised comment 4 above. Interrupted flow as it relates to this comment would apply to links 107.1 and 107.2, which were not changed to interrupted flow in the analysis. This evaluation should also include a hand adjustment at the SR 207/CR 305 intersection to determine if any additional turn lanes will be required at this intersection in addition to the signal. It is anticipated that at minimum a northbound left turn only lane on CR 305 would be warranted with the project access to CR 305 at the Town Center and the distance to the first median opening on SR 207 northeast of CR 305.

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Applicant's Response: Based upon the SIS facility status of SR 207, it was agreed by FDOT and the County at the 10/24/06 methodology meeting that interrupted flow service volumes would only be applied from Cypress Links Blvd. to I-95. Table 21-2 in Tab C reflects these changes. The applicant is willing to accept the commitment to signalize and add any necessary turn lanes, if required. Our preliminary mitigation proposal includes the cost of northbound turn lanes on CR 305 and traffic signal installation when warranted at the intersection.

13. The intersection turning movement projections show decreasing turning movements at the I-95 at SR 206 and SR 207 interchanges. This would not be anticipated given the traffic growth trends in this area. The projections need to reflect a reasonable growth. See comment 19 below.

1/30/2007

Some movements are still showing a decrease. The SB left and WB right at the I-95/SR 207 interchange has a lower projection in 2021 than the existing count. The TMC's at these two interchanges should exhibit at least a 1% per year growth. The SR 312 Extension, which is the only new roadway in the area, would not be expected to cause these interchange volumes to decrease.

Applicant's Response: Even with the decreasing TMC volumes at I-95/SR 207, shown in Tab E, Figure 21-8, of the First Sufficiency Response, the interchange is failing. As part of the applicant's proposed mitigation strategy, a majority of the proportionate share dollars are intended to fund necessary improvements to this regionally significant interchange. Nonetheless, the applicant will adjust the SB left and WB right TMC's to reflect a 1% per year growth rate. It should be noted, however, that the SR 312 Extension does provide future relief to SR 207 from Wildwood to Holmes, as well as relief to the segments of Holmes and Kenton Morrison by the build out phase.

14. Intersections analysis needs to be provided for all intersections where project impact is 5% or greater on a leg of the intersection. Please also provide a table documenting that the intersection turning movement projections balance with the link volume projections.

1/30/2007

Analysis needs to be conducted to determine if the improvements provided by through lanes on significant and adverse links will be sufficient to bring intersections failing the LOS standard up to the LOS standard of the intersection approach link with the most stringent LOS standard. No approach should be more than one letter grade below the link LOS standard. Improvements required beyond those provided by through lanes in a link widening should be accounted for in intersection impacts.

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Applicant's Response: Acknowledged. Tab E of the First Sufficiency Response provides HCS and Synchro results based upon revised geometry and signalization of all failing intersections. The intersection costs provided in Table 21-17, including as part of Tab C, contemplate the costs of improvements beyond those that would be provided through the share calculated in any segment widening. The applicant will provide any necessary intersection analysis during the modeling and monitoring phases of the project.

15. The evaluation of the SR 207/I-95 interchange did not consider left turn storage for the left turns onto I-95 that is likely too short. The analysis of the interchange with 3 through lanes assumed protected/permissive operation of these left turns, which would be protected only. Also, the worksheets do not convey all of the information needed for review such as the detailed timing data. However, it appears more turn lanes and storage likely will be needed upon more detailed analysis. The improved interchange appears to add right turn lanes on SR 207 approaching the interchange ramps but they are not included in the improvement costs. Finally, the analysis did not consider that widening to add more through lanes on SR 207 will require reconstruction of the I-95 overpass, which needs to be included in the improvement costs.

1/30/2007

Widening/reconstruction of the I-95 overpass over SR 207 will be required to widen SR 207 to six lanes in order to provide the left turn lanes as shown in the analysis. Existing queues in the left turn lanes under the overpass exceed the storage; therefore this deficiency needs to be reflected in the Phase 1 impacts. Widening/reconstruction of the overpass should be included in the proportionate share calculations for the link analysis or reflected in the interchange intersections analysis costs. The existing ramp spacing is 500 feet and likely will require spreading of the ramps and/or adding additional ramps in order for the interchange to function acceptably. The interchange intersection cost needs to contemplate the project impact toward a comprehensive solution to the interchange capacity problem including ramp reconstruction/relocation and additional right of way that may be required. This MUST be done prior to finalizing a development order so that project responsibilities can be clearly defined in the DO.

Applicant's Response: Acknowledged. While an IMR will determine the necessary improvements and timeline, the applicant's preliminary mitigation proposal contemplates the reconstruction of the overpass to accommodate the requisite 6-laning of SR 207. The applicant has also conceptualized cloverleaf and diamond interchange alternatives, as well as specific ramp improvements; to the extent that future project and non-project related traffic impacts will be mitigated.

16. Recent information on the FDOT Planning website indicates that the 2004 Transportation Costs handbook is no longer valid for estimating road improvement costs.

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The unit costs for Elkton need to reflect the revised cost data from FDOT when it becomes available.

1/30/2007

FDOT has complete costs available for 2006, which should be used for the proportionate share calculations. Since we are in FY2007, costs should be expressed in FY2007 values.

Applicant's Response: The most recent FDOT Costs from FY 2007 (3/16/2007), included as part of Tab C, as well as the costs provided by URS located in Table 5 of the FDOT First Sufficiency Response Comments, have been utilized to calculate the proportionate share.

17. Elkton is proposing to utilize pipelining to satisfy transportation concurrency requirements per F.S. 163.3180(12). This provision requires that the development construct one or more improvements that benefit a regionally significant transportation facility.

1/30/2007

No mitigation proposal has yet been presented. Please provide for review.

Applicant's Response: A preliminary mitigation proposal was discussed with the County on 9/26/2007. We will continue to work with the County and FDOT during the 2nd Sufficiency Response and prior to the DO to develop and refine a mutually acceptable mitigation strategy.

19. St. Johns County presently is working to secure a right of way reservation for a future extension of Watson Road west to the I-95 right of way. The intent is to continue this right of way across I-95 and connect to SR 207. The corridor needs to be coordinated with the Elkton property and plan.

1/30/2007

The current plan does not contemplate the above stated corridor. It is anticipated to be a 4-lane Major Collector roadway. Please coordinate with SJC Engineering for the right of way width.

Applicant's Response: The applicant proposes to reserve up to a 150 feet of right of way within the Southwood Preserve (formerly "Elkton") property to accommodate a future Watson Rd. Extension to SR 207. Marlin Pryor from St. Johns County Engineering noted that part of the right of way extending westerly from U.S. 1 is scheduled to transition from 80 feet to 130 feet.

St. Johns County is also working on a corridor study for a CR 2209 Extension from CR 208 south to CR 305. Please coordinate with SJC Engineering regarding the right of way width that may be required along the portion of CR 305 that borders the Elkton site.

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Applicant's Response: Acknowledged. The applicant will coordinate with all applicable agencies in order to develop a final mitigation strategy that will maximize the proportionate share contribution to regionally significant improvements identified in the CIP and, if necessary, provide ROW to accommodate these objectives.

21. An AM peak hour analysis should be included at the I-95 interchanges with SR 207 and SR 206 to ensure all of the impacts are accounted for. A high school is located on SR 206 just east of I-95.

1/30/2007

The requested analysis at the interchanges was not provided. Please provide the requested analysis.

Applicant's Response: This detailed analysis would be submitted as part of the necessary IMR. The new development program also results in no significant and adverse impacts to SR 206 from CR 305 to A1A, as shown in Table 21-7 in Tab C.

22. The 2004 FDOT Transportation Costs handbook states that the engineering costs should be applied to the construction costs including right of way. The proportionate share tables exclude the right of way from the engineering costs calculation and should be corrected. The cost per SF for the SR 312 bridge appears to be too low given the ranges included 2004 FDOT Transportation Costs - a midrange cost for the appropriate type structure should be used. The handbook also states that right of way is 3% for bridges.

1/30/2007

The "2004 FDOT Transportation Costs handbook states that the engineering costs should be applied to the construction costs including right of way. The proportionate share tables exclude the right of way from the engineering costs calculation and should be corrected" comment was not addressed. Please revise proportionate share calculations to match 2004 FDOT Transportation Costs handbook procedures.

Applicant's Response: The applicant has included in the proportionate share calculations the appropriate FDOT right of way, signalization, and PE & CEI costs to all links that are adversely impacted. Based upon the revised development program, the SR 312 bridge is no longer impacted, while SR 207 links 107.3 through 110 have been updated to reflect right of way costs. This information is provided in the corresponding tables in Tab C.

23. Applicant needs to provide documentation as to how the average unit costs were calculated beyond just referencing the costs booklet.

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1/30/2007

The requested information was not provided for this comment ("Acknowledged" without providing the requested information is not considered a response). Please provide the requested table so that input values can be verified.

Applicant's Response: The applicant will provide the requested cost references and the corresponding proportionate share tables in electronic format.

24. Proportionate share cost calculations do not include the bridge on US 1 north of King Street (link SA-85), the SR 312 railroad overpass bridge east of SR 207 (link 112), the SR 206 bridge over the intracoastal waterway (link 102), the I-95 overpass for SR 206 link 101 or the SR 207 bridge over Deep Creek (link 104). These costs need to be added.

1/30/2007

The SR 206 bridge over the Intracoastal waterway has a 110' movable span, which has a cost per square foot of \$1100 for the movable span. Please update the bridge cost to \$17,262,000 (110' x 42' x \$1100 + 2900' x 42' x \$100).

Applicant's Response: Based upon the applicant's revised development program, as shown in Table 21-6a and the corresponding Future Conditions Analysis Table 21-7 in Tab C, the SR 206 Intracoastal Waterway bridge is no longer adversely impacted.

26. The service volume increases for the SR 206 segments assume uninterrupted flow but there are existing traffic signals at SR 207, US 1 and SR A1A and traffic signals have been warranted for the I-95 interchange that are projected to be installed in 2007. Interrupted flow change in service volume needs to be used for the service volume increases.

1/30/2007

This comment has not been addressed. Please revise analysis and proportionate share calculations with interrupted flow MSV's as requested.

Applicant's Response: At the 10/24/2006 methodology meeting a list of FDOT roadways were discussed with respect to adjusting specific MSV's to reflect interrupted flow. At this meeting, it was determined by FDOT that only segments along SR 207 from Cypress Links Blvd. to SR 312 were to be modified to interrupted flow service volumes. These have been corrected in the applicable Existing Conditions Table 21-2, included in Tab C, and are reflected in the corresponding future conditions analyses. SR 206 will be evaluated as uninterrupted flow because signal spacing on all links is greater than 2 miles even with the signals identified above.

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27. Right of way costs are not included for the SR 207 improvements and need to be added. If the standard factor is not to be used, then a right of way analysis should be included for each impacted segment.

1/30/2007

Because the right of way costs represent a state-wide average, unless detailed right of way calculations are going to be prepared for each improvement, then right of way should be added for all. Historically, projects that were estimated to not require right of way acquisition in the planning stage have ultimately ended up with right of way acquisition. At minimum, pond sites will likely be required.

Applicant's Response: Right of way costs have been included in the proportionate share calculation tables for all significantly and adversely impacted roadway segments.

28. The proportionate share for SR 312 link 114.1 assumes a 6-lane existing road but this roadway is only 4 lanes. Please correct.

1/30/2007

Link costs used in proportionate share calculations only reflect adding two lanes rather than four as response indicates. Please correct.

Applicant's Response: Acknowledged. This has been corrected in the proportionate share calculations in Table 21-11, in Tab C.

29. The analysis assumes a split of SR 207 link 107.1 and asserts a significant and adverse impact to only one portion of the split segment. If this split is to be approved, a detailed evaluation of the assignment of project trips to the driveways as they relate to the location of land uses within the site plan needs to be provided. Otherwise, the link should not be split and the adverse impact should be applied to the entire segment. Based on Map H, it appears more of the trips should be assigned to the Town Center driveway.

1/30/2007

The requested information was not provided for this comment ("Acknowledged" without providing the requested information is not considered a response). Please provide the requested analysis accounting for revised comments 4 and 5 above.

Applicant's Response: Based upon the revised development program, link 107.1 is no longer adversely impacted. The revised analysis does indicate significant and adverse impacts to links 107.3 through 110 (Cypress Links Blvd. to SR 312) and the applicant has calculated a proportionate share responsibility for each of those segments, as shown in Tab C.

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30. Shouldn't the Mariposa trips be consistent with their proposed phasing schedule and distribution rather than only a portion of their trips?

1/30/2007

The Mariposa 50% trips do not match the Mariposa traffic assignment from the 2nd Sufficiency Response. Please revise. Also, a check needs to be made that the background traffic growth will accommodate the Mariposa trips. It appears when the Mariposa assignments are revised that some links final background traffic projection with 50% Mariposa traffic will still be lower than existing traffic plus all of Mariposa. Request is that at least a 1% background growth plus Mariposa be maintained as additional development in Hastings and St. Johns County will at least yield a 1% per year growth as agreed upon at the 10/24/06 meeting. Please provide documentation that this check has been made and revise background traffic as necessary.

Applicant's Response: 50% of the values of Columns 12 and 20 in Table 21-7 of the Mariposa 2nd Sufficiency Response were added to the sum of Southwood Preserve (f/k/a Elkton) background and project trips on those links sharing traffic assignment.

The only segments shown to have decreasing volumes are those near Kenton Morrison, Holmes, U.S. 1, and SR 207, as a result of the SR 312 Extension. The adjusted background traffic volumes shown in Appendix 21-D2, included in Tab C, reflect the inclusion of the agreed upon 1% growth rate, where necessary, to ensure the growth between each successive phase. The 50% Mariposa traffic is added to these values in Table 21-7.

31. Please provide electronic copies of the model files and link analysis and proportionate share calculation spreadsheets including formulas with the First Sufficiency Response for County review.

1/30/2007

Model files were submitted but the spreadsheets were not. Please provide as requested.

Applicant's Response: Acknowledged. The electronic spreadsheets are included with this submittal.

1/31/2007

32. The MSV for SR 207 from Holmes Blvd to SR 312 needs to be corrected.

Applicant's Response: The MSV has been corrected to represent interrupted flow for this segment and is reflected in both the Existing Conditions (Table 21-2) and Future Conditions (Table 21-7) analysis, located in Tab C.

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1/31/2007

33. The 2007 and 2011 background traffic volume for Kings Estate Rd/Hilltop Rd link 59 is lower than the existing traffic count. This link was shown to be significant and adverse in the ADA submittal and presently is deficient in the concurrency management system. Staff believes this link will be significant and adverse. Please recheck the background traffic projections to ensure positive growth and revise analysis.

Applicant's Response: The background volume for Kings Estate/Hilltop Rd. is based upon a trend analysis of the historical AADT's using provided St. Johns County traffic counts from the 1995-2005 TAS reports. The volumes in these reports for this segment (and others) are shown to fluctuate likely as a result of construction activities and/or new roadway improvements. The subsequent modeling effort which incorporates updated project and non-project socioeconomic data and network changes does not result in adverse impacts to this segment. A 1% growth rate is still exhibited between the phasing years, nonetheless.

The applicant also contends that specific network improvements in the NERPM model can provide relief to existing constrained segments in the future. This illustrates the flaw in making traffic generalizations through the comparison of the volumes in the existing concurrency system with the regional model. The general assumption that background traffic should increase on all roadway segments in the future is not always true. Network and facility type changes will potentially divert trips from existing roadways to more attractive and less constrained facilities in the future. The 2021 future model run indicates that with the inclusion of the S.R. 312 Extension, a substantial amount of trips will be diverted away from segments along U.S. 1 and portions of S.R. 207, as indicated in the Future Conditions Table 21-7, included within Tab C.

Information Only:

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Comments herein provided pursuant to Chapter 9J-2 F.A.C. procedures and St. Johns County Land Development Code Article XI.

HISTORIC PRESERVATION PLANNING

The submitted archaeological report was found to be sufficient by county staff. The report indicates that all artifacts shall be returned to the landowner after completion of the project. This office requests that the artifacts be donated to St. Johns County for the purposes of preservation and community education, and requests permission from the landowner to salvage remaining artifacts of site 8SJ5019 for the same purposes. Robin Moore, Historic Resources, Planning Division, (904) 209-0623.

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Applicant's Response: The applicant has no objection to county historic preservation staff salvaging artifacts of site 8SJ5019 following final development approval. Any salvage activities must be coordinated with the applicant prior to commencement.

DRI PLANNING

1. Please clarify the submittal as it pertains to Policy A.1.2.2 of the St. Johns County Comprehensive Plan. Only a very small portion of the project site is within the development area boundary, and of that small portion, it appears that the majority of that acreage is wetlands.

1-25-07

UPDATE

Staff agrees with the comment response as it pertains to the portion of the Policy concerning the provision of central water and sewer, however it remains concerned about the expansion of the development area boundary outward, considering that the only portion of the site in which the boundary extends is a wetland area.

Applicant's Response: Policy A.1.2.2 states that, "The County shall promote residential development, within the Development Areas as depicted on the Future Land Use Map..." As indicated in previous submittals, a portion of our site is within the current development boundary. Our project provides a natural progression for growth contiguous to this boundary, filling a void between the boundary south of the project and the connection on the north east corner. With the existing boundaries, the extension of the development area boundary southward to CR 305 would result in a more logical physical boundary. Further, there are tracts of development contiguous to the DRI site. Despite their location within a development area, these developments are single-use residential subdivisions that promote the sort of urban sprawl that Policy A.1.2.2 seeks to curb. The expansion of the St. Augustine Development Area to incorporate the Southwood Preserve DRI site would result in a more natural boundary at CR 305 and would promote a mixture of uses and result in a more sustainable development pattern for the area.

2. Civic uses will be considered as accessory to and included inside a master planned community, however churches should be separated out for review and for planning purposes will be pulled out of the non-residential square footage tabulations.

1-25-07

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UPDATE

Please clarify your comment from the response that states that churches are not a specific part of the Elkton DRI Development program. Do you mean that there is not an anticipation that churches will ultimately be developed inside Elkton or that the project is not centered around them? Based on conversations with Bill Hartmann, in previously approved DRIs, churches have been part of the planning analysis based on their trip generation rates.

Applicant's Response: As was noted in the First Sufficiency Response, while churches are a permissible use within the Southwood Preserve DRI (f/k/a Elkton), they are not a specific part of the development program. Churches may ultimately locate within the DRI, but the applicant cannot reasonably estimate the size or quantity of potential houses of worship. Churches tend to operate at non-peak trip hours (Wednesday evenings and Sunday mornings) with the bulk of the worshipers projected to live within the Southwood Preserve DRI.

3. In the opinion of Staff the project creates an enclave that does not support the County's prohibition against urban sprawl and creates potential infill in the easterly undeveloped properties that may result in unneeded or unwarranted development. Please clarify this using Policy A.1.2.2 of the St. Johns County Comprehensive plan as a reference point.

1-25-07

UPDATE:

In light of the DCA's similar comment to Staff's previous comment, please assess the proposed development against the following Primary Indicators of Sprawl

Using F.A.C Section 9J-5.006(5)(g)(1) in reference to the project's gross density of 1.29 du/a.

Applicant's Response: 9J-5.006(5)(g)(1). [Whether the plan amendment] Promotes, allows or designates for development substantial areas of the jurisdiction to develop as low-intensity, low-density, or single-use development or uses in excess of demonstrated need.

The relatively low gross residential density of 1.29 du/ac within the Southwood Preserve DRI (f/k/a Elkton) is a function of the large proportion of wetlands on the project site. Because large wetland areas of the project site will not be developed, residential density will be low when looking at the entire project on a gross acreage basis. The mixture of uses proposed for the Southwood Preserve DRI further refutes this sprawl indicator. When looked at compatible to County methodology for computing density (on net developable acreage) the minimum residential density on the site is 2.6

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du/ac, which is compatible to adjacent developments and much of the City of St. Augustine.

The mixture of uses proposed for the Southwood Preserve DRI further refutes this sprawl indicator. Creative planning strategies will create an urban village and establish a village center for Elkton that includes residential, commercial and civic uses.

Additionally, the underlying need for affordable housing in St. Johns County has prompted the extension of the residential growth southwest toward the Property.

A needs analysis has been submitted for the Southwood Preserve DRI as part of the First Sufficiency Response to the Application for Development Approval and the second submittal for the Comprehensive Plan Amendment. This analysis determined that there is a need for additional residential land use supply in southwest St. Johns County that could be met as a result of the Southwood Preserve DRI.

The Southwood Preserve DRI clearly complies with the 9J-5 criteria that discourages low-density, single-use development and does not promote sprawl. The Southwood Preserve DRI is an exemplary model for planning and development in a progressive, unified and regional manner.

In addition, please assess the development using F.A.C Section 9J-5.006(5)(g)(2) concerning the distance from urban areas etc.

Applicant's Response: 9J-5.006(5)(g)(2). [Whether the plan amendment] Promotes, allows or designates significant amounts of urban development to occur in rural areas at substantial distances from existing urban areas while leaping over undeveloped lands which are available and suitable for development.

The Southwood Preserve DRI (f/k/a Elkton) is not located at substantial distances from urban areas, nor does it leapfrog over undeveloped lands. On the contrary, portions of the Southwood Preserve DRI site are located within the St. Augustine Development Area. Further, development exists within the St. Augustine Development Area adjacent to the project site. Specifically, there are four (4) single-use, residential developments along SR 207 between the Southwood Preserve DRI site and Interstate 95, and a fifth Planned Rural Development that has been approved, but not yet developed. These developments and their distances from the Southwood Preserve DRI site are listed below.

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- The Vermont Heights community is less than one-half ($\frac{1}{2}$) mile from the Southwood Preserve DRI site.
- Coquina Crossing's entrance is approximately one and one-quarter ($1\frac{1}{4}$) miles from the Southwood Preserve DRI site.
- Cypress Links is less than two (2) miles from the Southwood Preserve DRI site.
- CountryWalk Estates PUD, which was approved in 2004, is adjacent on the north and east boundary along SR 207.
- The Westchester PRD, which was approved by St. Johns County in 2005, is located directly across SR 207 from the Southwood Preserve DRI site.

Given recently approved developments and new residential subdivisions in the immediate area of the Southwood Preserve DRI site, CR 305 presents a more logical line of demarcation for the St. Augustine Development Area. Further, once complete, Southwood Preserve will enable provision of essential services to these existing and approved communities.

The Southwood Preserve DRI will contain a mixture of uses, including non-residential uses and public services that are presently lacking in this part of the county. These proposed non-residential uses within Southwood Preserve will balance the existing predominance of single-family uses in the surrounding area, providing jobs and services that will ensure the viability of this community for years to come.

Also, F.A.C. Section 9J-5.006(5)(g)(5) which pertains to the protection of adjacent agricultural areas and existing agricultural and silvicultural activities.

Applicant's Response: 9J-5.006(5)(g)(5). [Whether the plan amendment] Fails adequately to protect adjacent agricultural areas and activities, including silviculture, and including active agricultural and silvicultural activities as well as passive agricultural activities and dormant, unique and prime farmlands and soils.

The Southwood Preserve DRI has increased the amount of light industrial square footage to help the long term regional agricultural community. Our site is ideally positioned to offer goods and services through our office and retail land uses, but also serve direct agricultural needs within the industrial land use. With the agricultural lands west of the site and with the increase in industrial square footage, we become integral for crop storage, food processing and agricultural product supplies. Positioned along at the intersection of CR 305 and SR 207, the site is located at a transportation crossroads and provides a "funnel" for agricultural goods moving out of the fields to the west to Interstate 95, particularly as it relates to the potential for

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crop storage and processing. Also, over 700 permanent jobs, not including those positions resulting from the new educational facilities, will be created on the Southwood Preserve DRI site, which also helps provide additional second job opportunities for farm families as has become common practice.

The developable areas for Southwood Preserve are predominately in silviculture currently, and as described above, can offer the necessary development opportunities to support the agricultural community.

Explain also in detail, the development as it pertains to F.A.C. Section 9J-5.006(5)(g)(8) which deals with timing and the development's impact on essential public services.

Applicant's Response: 9J-5.006(5)(g)(8). [Whether the plan amendment] 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.

As a DRI, this project is required to mitigate for any adverse impacts that could result from its development. The Southwood Preserve DRI will establish a compact node of development and will provide commercial services that are currently lacking in the area, which will result in a more efficient use of resources.

Further, explain the development as it pertains to F.A.C. Section 9J-5.006(5)(g)(10) as it pertains to the discouragement of infill development or the redevelopment of existing neighborhoods and communities.

Applicant's Response: 9J-5.006(5)(g)(10). [Whether the plan amendment] Discourages or inhibits infill development or the redevelopment of existing neighborhoods and communities.

Given the proximity of the project site to some of the fastest growing areas of the United States, the Southwood Preserve DRI will capture development that otherwise would likely occur in the form of single-use subdivisions or large lot PRD's.

The proposed DRI would facilitate the provision of essential services otherwise not available to communities such as Vermont Heights, thereby facilitating redevelopment and infill in these existing communities. This DRI will allow for smarter planning for public facilities and services for the entire southwestern portion of St. Johns County. Additionally, improvements to the southwestern portion of St. Johns County that result from this project will encourage the redevelopment of the existing neighborhoods and communities and encourage infill of existing sites.

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4. ~~The project proposes to provide a 100 foot buffer along SR 207. Please provide analysis or evidentiary thought that a 100 foot buffer is sufficient to minimize the effects of the nearby adjacent farm usages and their ancillary effects of noise, odor, particulates and traffic flow i.e. vehicle types (slow moving vehicles) and their speed. Please reference Objective A.1.13 and Policy A.1.13.1 in particular.~~

1-25-07

UPDATE:

Applicant has agreed to increase the buffer inside any residential development areas along CR 207 to 300 feet, with the understanding that the Town Center area buffer along CR 207 will remain at 100 feet. However since the site circumstances at that location (fallow row crop fields) are such that there is no vegetation present, it is expected that the 100 foot buffer would be a 'created' buffer with plantings, berming, etc. Please provide further comment on this development aspect as it pertains to minimization of the agricultural impacts nearby.

Applicant's Response: The development agrees to provide a minimum 300' buffer along the residentially developed portion of the site (see map H). It is not desirable to provide a buffer along the edge of the town center. The town center design focuses on pedestrian-friendly, human-scale and street-oriented buildings to create an inclusive atmosphere and help build a sense of place and connection with the greater community as a whole. Landscaped "town greens" will be used to draw people in, not to isolate the project.

5. Page 10.9-- Please elaborate on how the development intends to minimize the impact to wetlands.

Applicant's Response: Development activity within the Southwood Preserve DRI will be located outside of wetland areas to the maximum extent practicable and appropriate buffers will be used. Where wetland impacts cannot be avoided, mitigation will be achieved through wetland creation or enhancement on other parts of the DRI property. Buffers will be increased where practical as part of the development program to implement Low Impact Development (LID) criteria.

7. The following comments are generated pursuant to the Pre-Application Conference for the Elkton DRI that was held on January 27, 2006 and the Pre Application Summary generated by Ed Lehman of the Northeast Florida Regional Council.

* Under Question 13, Wetlands, it appears that an agreement was reached that a formal wetlands determination should have been made before this submittal. Throughout the

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submittal packet it indicates that this has not occurred. Please clarify.

1-24-07

UPDATE:

The First Sufficiency Response indicates that no agreement was sought or reached to require a Formal Jurisdictional Wetland Determination, however a copy of the Preapplication Summary Letter written by Ed Lehman of the Regional Council states in Question 13, Wetlands, ... A formal wetland determination should be established before submittal of the DRI...

Applicant's Response: The applicant has reviewed Mr. Ed Lehman's Preapplication Summary Letter, and has considered the statement written by Mr. Lehman in association with Question 13. During the Preapplication Conference, concerns were raised by the St. Johns River Water Management District (SJRWMD), both verbally and in writing, pertaining to their initial assessment of the property concerning issues of wetland jurisdiction. Additionally, SJRWMD recommended that a Formal Jurisdictional Declaratory Statement (JDS) be completed prior to the ADA submittal. At that time, the applicant took SJRWMD's comments into consideration, but at no time, either verbally or in writing, agreed to complete a JDS on the property prior to or during the DRI process. It is our understanding that Mr. Lehman was merely repeating SJRWMD's preliminary concerns and recommendations as a part of his Summary Letter. Please also note that the comments received from SJRWMD in response to the applicant's first sufficiency responses make no further mention of a requirement to provide a JDS during the DRI process.

The applicant has taken great effort in identifying and illustrating the locations of all wetlands associated with this DRI. Further, the applicant recognizes that portions of the property not currently identified as wetlands may be claimed as jurisdictional wetlands by SJRWMD and/or the U.S. Army Corps of Engineers (COE), just as some areas currently identified as wetlands may be found to be nonjurisdictional, during future environmental permitting efforts associated with this project. It is important to note, however, that any additional areas found to be jurisdictional wetlands during future permitting efforts would be of relatively low functional quality due to silvicultural/agricultural disturbances, and would not represent wetland resources of regional importance, especially in comparison to the identified on-site wetlands slated for perpetual preservation. Additionally, a JDS would not fit into the framework of the DRI timetable, being only valid for five (5) years, so the lengthy and expensive process would likely need to be repeated prior to project development.

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It is the applicant's position that the pursuit of a JDS would be a lengthy and involved process and outside of the mandate typically associated with the DRI process. Upon further review, the poor quality of the wetlands on-site with minimal regional importance and the substantial amount set aside for the trail system, the added time and expense of a JDS was not pursued.

~~*—Acreage amounts of each soil type present on the site should be provided.~~

8. Please ensure that under Question 9, Maps, that the submitted color maps will be legible, readable, and discernable when copied in black and white for future transmittals.

Applicant's Response: Acknowledged.

9. From Library Services: Library Services Director Mary Jane Little requests that consideration be given toward the reservation of a 5-7 acre parcel suitable for hosting the construction of a 25000 square foot library. Perhaps this facility could be multipurpose or have shared usages in non-library hours.

Applicant's Response: The applicant met with Mary Jane Little and Teresa Bishop on October 3, 2007. At that meeting, the possibility of an off-site library facility in the Hastings area was discussed. The applicant is committed to ensuring that library service needs are met and will continue to work with the Library Services Department through the Development Order process.

The following comments summarize the conversations that Staff has had with David Dinkins, County Extension Director.

1. Staff continues to believe that the Elkton DRI's impact on local agriculture both from a perspective of diminishing the viability of farming in the area as well as its impact on the specific machinations involved with large scale farming operations (tractors, slow moving vehicles, etc.), are understated by the development's ADA and First Sufficiency Response. The applicant should supply additional information.

Applicant's Response: The applicant has met with Mr. Dinkins throughout this process. It is acknowledged that the already widened SR 207 and traffic traversing the area currently has an impact on the movement of farming equipment and agricultural operations south of SR 207. However, the Southwood Preserve DRI has the mixed-use components, including the light industrial uses to support expanded agri-business in the area as well as the future transportation improvements to key intersections, which will enhance the surrounding agricultural uses that are predominantly northwest of SR 207 and CR 305.

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2. Staff believes that there are programs and options available which might keep the farming operation viable that would be worth exploring for the portion of the DRI currently in agricultural production. Applicant should supply documentation that would refute this perception.

Applicant's Response: To repeat what is stated previously in another comment, the Southwood Preserve DRI has increased the amount of light industrial square footage to help the long term regional agricultural community. Our site is ideally positioned to offer goods and services through our office and retail land uses, but also serve direct agricultural needs within the industrial land use. With the agricultural lands west of the site and with the increase in industrial square footage, we become integral for crop storage, food processing and agricultural product supplies. Positioned along at the intersection of CR 305 and SR 207, the site is a “transportation funnel” for agricultural goods moving out of the fields to the west to Interstate 95, particularly as it relates to the potential for crop storage and processing. Also, over 1,000 jobs will be created on the Southwood Preserve DRI site, which also helps provide additional second job opportunities for farm families as has become common practice, if not necessary to sustain themselves. We have repeatedly consulted with the reviewer for feasible alternatives meeting their philosophical criteria and believe we have come up with one of the most viable and helpful solutions to the agricultural community at large.

3. Staff continues to maintain concerns that the Elkton DRI is of a nature to have long term and lasting negative effects on agriculture in St. Johns County and the immediate area. The applicant should supply data to refute the negative effects.

Applicant's Response: C.R. 305 and S.R. 207 provide natural buffers between this site and nearby agricultural lands. Existing preserved vegetation will buffer the residential areas from adjacent land uses to offset any potential impacts on nearby properties.

HOUSING

Staff met with representatives of the developer. We reviewed the County's 5% goal for affordable housing, which would equate to 180 units. We have discussed the donation of a site to the County sufficient to develop the 180 multifamily units. No agreements have been reached.

As noted in the First Sufficiency Response, staff previously met with the applicant and as of this time no agreement has been made. Staff will continue to work with the applicant.

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Applicant's Response: Acknowledged. The applicant met with Tom Crawford on September 28, 2007 to continue dialogue on meeting affordable housing needs. The applicant is presently researching alternative options proposed at that meeting and will continue to coordinate with Housing Services staff regarding affordable housing as part of the Development Order process.

COUNTY UTILITY DEPARTMENT

1. Non-potable water or irrigation demand has been calculated based on approximately 180 GPD per Single Family unit. Based on the information available within our existing service area, approximately 400-600 GPD is utilized for SF irrigation. Please provide methodology of calculation listed in your application. Table 17-1 and other related tables and references there after are referred to this comment. ***Table 17-1. Assumption indicated in table and page 55 show non-potable demand at 558 GPD per single-family unit. However Table 17-1 indicates approximately 484 GPD per single-family unit. Please clarify.***

Applicant's Response: Table 17-1 and 17-2 have been revised to indicate that non-potable water demand is equal to 558 GPD per single family unit. Please see revised tables attached.

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**Table 17-1
POTABLE/NON-POTABLE WATER Demand (MGD)**

LAND USE	DEVELOPMENT	POTABLE WATER DEMAND (MGD)	NON-POTABLE WATER (IRRIGATION) DEMAND (MGD)	TOTAL WATER DEMAND (MGD)
Phase 1				
Single-family Residential	775	0.271	0.432	0.704
Multi-family Residential	70	0.021	0.002	0.023
Retail	90,000	0.009	0.006	0.015
Flex Industrial	168,000	0.025	0.017	0.042
Office	40,000	0.006	0.004	0.010
Elementary School	700	0.011	0.008	0.019
Phase 1 Total		0.343	0.470	0.813
Phase 2				
Single-family Residential	1,100	0.385	0.614	0.999
Multi-family Residential	280	0.084	0.010	0.094
Retail	50,000	0.005	0.003	0.008
Flex Industrial	168,000	0.025	0.017	0.042
Office	40,000	0.006	0.004	0.010
Park	10	0.003	0.002	0.005
Phase 2 Total		0.508	0.650	1.157
Phase 3				
Single-family Residential	1,125	0.394	0.628	1.022
Multi-family Residential	250	0.075	0.009	0.084
Flex Industrial	169,000	0.025	0.017	0.042
High School	1,500	0.023	0.018	0.041
Middle School	1,000	0.015	0.012	0.027
Park	10	0.003	0.002	0.005
Phase 3 Total		0.534	0.685	1.220
Total Buildout		1.385	1.805	3.190

**Table 17-2
POTABLE/NON-POTABLE WATER SUPPLY (MGD)**

	ON-SITE SUPPLY (MGD)			OFF-SITE SUPPLY (MGD)	TOTAL SUPPLY (MGD)
	GROUNDWATER	SURFACE WATER	TOTAL		
Potable	0	0	0	1.385	1.385
Non-Potable	0	0.903	0.903	0.902	1.805
Total	0	0	0	2.287	3.190

2. Provide map showing location of the 2-Acre site for reuse and potable water booster stations. Map H could be utilized for this purpose. Approximate locations shall be as indicated in availability letter dated June 16, 2006. *Page 41 - As indicated in the Availability letter. The Master Booster Station site shall be in close proximity to SR207 or CR305. Also indicate location of Reuse Tank site. The Reuse Tank site could be centrally located relative to the development.*

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Applicant's Response: Map H has been updated to reflect the approximate locations for the booster stations. The master potable water booster is proposed along SR 207 with direct access to 207. The re-use booster is more central within the community with access from one of the main internal circulation routes.

FIRE SERVICES

The Elkton DRI will have significant impact to the future Fire Rescue Department Master Plan for the South West section of the County.

Fire Protection and the level of fire protection is determined by the Insurance Services Office. The community fire protection rating range from 1 to 10, with 1 being the best and 10 being the worst. Currently the Insurance Services Office (ISO) has classified this area of the County and this project site as a class 10-community fire protection rating. The County is attempting to maintain a Class 5 rating for all urban areas that are being developed. In order for this project to receive a class 5 rating a fire station needs to be within 5 road miles of the project and have pressurized fire hydrants within 1000 feet of every lot. This pressurized system would have to be provided by a central utility or by a private fire protection system owned and maintained by the homeowners.

Based on the limited information we have to run the fire analysis model we know that a fire station is needed for the project. At this time we can not determine if the fire station needs to be located inside the project area or outside the project area. Additional information will be needed to address this topic.

With regard to the staffing of a fire station, currently a fire engine has 4 fire fighters assigned, and rescue units have 2 paramedic firefighters assigned. The station is staffed 24 hours a day with 3 shifts; each shift works a 24 hour shift. We would anticipate that at least a fire engine would be needed to be housed at this station with a rescue unit being added as population and medical response calls increase.

With this in mind we will be requesting a 3-acres fire station site which may or may not be located in your development. This site will be dedicated to the Fire Rescue Department for a future Fire Station and there is no date established for this station to be developed.

*****1/26/07*****

Fire Rescue has reviewed the Elkton DRI First Sufficiency Response and has the following comments:

- 1) Our needs are based on providing the best level of service as determined by the Insurance Services Office. (ISO) Fire Rescue's goal is to attempt to maintain a Class 5 rating for all urban areas being developed. (The parameters of the different classes

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were explained in the original submittal for this DRI.) A fire analysis model was run and determined a fire station will be needed in this area.

- 2) Based on a joint meeting on December 11th, 2006 with the Sheriff's office and the applicant's representatives, it was recommended a larger parcel, possibly ten acres was needed outside the DRI for a joint public safety facility shared by Fire Rescue and the Sheriff's office. This would best serve the public of the region of Southwood Preserve and allow the applicant to better utilize the Town Center.
- 3) Fire Rescue agrees that additional planning meetings are needed between the applicant's representatives, our dept and the Sheriff's office to further discuss a suitable location for a joint public safety facility.

Applicant's Response: The applicant met with representatives from the Sheriff's Department and Fire Services Department on October 9, 2007. Discussed was the need for a 5 acre law enforcement facility, a 3 acre fire facility, or 7.25 acre site if combined. Location of the facilities on or off-site was reviewed and the limitations for locating fire services westward of CR 305 to meet spacing criteria. Regardless of location, if accessing SR 207, a median crossing is required. A "template" site plan was provided to us for law enforcement sizing. Timing of donations and impact fees were also discussed. We have preliminarily reflected a site for joint fire and law enforcement use meeting the criteria described as reflected on Map H. This proposed location needs to be reviewed and the applicant will continue to work with both the Sheriff's Department and Fire Services staff through the Development Order process to finalize methods for resolving service needs.

ENVIRONMENTAL PLANNING

1. Please submit all Environmental Reports and Surveys that have been conducted on this property. Upon receipt a review will be made and additional comments may be issued. (Policy E.2.2.7)

Comment 01/26/07: The DEP has requested the applicant initiate a Site Assessment and provide a Site Assessment Report. The also state that they have not received the requested report. This site assessment would also contain information that would be critical for the County staff to evaluate in conjunction with proposed development uses. Therefore, again please provide all Environmental Reports and Surveys that have been conducted on this property. Upon receipt a review will be made and additional comments may be issued. (Policy E.2.2.7)

Applicant's Response: As stated in our first Sufficiency Response, the answers provided in ADA Questions 10, 12, and 13 represent the results of all

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vegetation- and wildlife-related Environmental Reports and Surveys, and the sole deliverable and summary of this information associated with the Southwood Preserve DRI. The responses to these ADA questions were determined through strict adherence to the survey methods and deliverable results mandated in the Florida Fish and Wildlife Conservation Commission's (Formerly Florida Game and Fresh Water Fish Commission) *Wildlife Methodology Guidelines for Section 18 (D) of the Application for Development Approval* (January 1988). The additional Phase I Environmental Audit has already been forwarded with the ADA submittal for your review. We encourage County staff to review the responses to ADA Questions 10, 12, and 13 in their effort to evaluate the environmental site conditions in context with the proposed development uses.

The only additional report that had yet to be submitted for review is the Water Quality Monitoring Plan, which is enclosed within this response.

2. Please discuss the presence or absence of any pollutants on the property especially in the northwesterly area and include a discussion on any clean-up measures that will be undertaken. (Policy E.2.2.7)

Comment 01/26/07: The applicant responded that contamination in conjunction with petroleum product usage was found on site but a report presented to the County for a proposed Brownfield designation also included other contaminants. The area where these are located are in the area identified as potentially a Mixed Use area that may contain residential uses. Please elaborate on the clean-up of these contaminants and the time frame for initiation and completion of those efforts.

Applicant's Response: The other contaminants were related to pesticides. The pesticide clean-up process is complete, which included ceasing application on the property and testing and monitoring levels in the soils. Without the continued applications, the pesticides have broken down to acceptable levels for residential development. The petroleum clean-up has also been completed and we are waiting for results from the monitoring wells. Surface clean up is substantially complete and continues. Many of the buildings have been removed and loose debris has all been removed and disposed of properly off-site. The applicant is continuing the process and finalizing the required clean-up.

9. Please provide approximate acreages for impacted wetlands, preserved wetlands and enhanced wetlands and show the locations. Once this required information is received a review will be made and comments rendered. (Policy A.1.15.2, 380 F.S., 28-24 F.A.C.)

Comment 01/26/07: Information required not provided. Please provide as requested for a review and additional comments.

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Applicant's Response: The applicant intends to pursue one or more Environmental Resource Permit (ERP) applications in the future, and at such time, will involve the regulatory agencies including SJRWMD and COE in the review of all wetland delineation, impact, and mitigation issues. Wetland impacts are extremely difficult to quantify at the DRI level due to the preliminary nature of the site plan and wetland determination. However, the project has been preliminarily designed such that the on-site wetlands exhibiting the highest relative functional values for fish and wildlife are to be conserved, as shown on Map H. These wetlands are proposed for preservation in perpetuity. The method/mechanism of preservation will be determined during the aforementioned permitting efforts.

Although there appear to be on-site opportunities for wetland enhancement, it is currently unknown to what extent, if any, wetland enhancement efforts will be required to offset impacts to jurisdictional wetlands. The identification and implementation of wetland enhancement, if required, will be determined through the review process during future environmental permitting efforts.

OFFICE OF COUNTY ATTORNEY

Your FLUM map only shows the existing designations; there should be one showing the proposed in the related FLUM amendment.

I saw no proof of ownership-- were they submitted for the two owners?

DO NOT SEE ONE FOR 207 PARTNERS LLC

Applicant's Response: This information is included as Tab D.

Do you intend to deed restrict to 55+ your senior housing or simply market it as such?

THIS IS YOUR RESPONSIBILITY AND NOTHING THAT WE WILL REVIEW NOR ENFORCE.

Applicant's Response: Acknowledged.

Please elaborate regarding your projections for impact fees at pg. 11.1-11.2; generally speaking, developers have requested impact fee credits for their non-site related improvements; do your impact fee revenue projections for this project take these credits into consideration? Please provide the same for your Fishkind Fiscal Analysis (ie; cumulative impact fee revenues are shown in tables; is the assumption that those numbers do not include impact fee credits?).

SOUTHWOOD P R E S E R V E

As this DRI requires an expansion of the development area and changes to the FLUM for additional residential, have you prepared a needs analysis for housing?

The utility letter points to a need to include CIE amendment to the county's comp. plan for the needed utility infrastructure that is not currently available. This CIE amendment will need to be processed in conjunction with this DRI application.

PLEASE TAKE STEPS TO FURTHER THIS ENDEAVOR WHILE THIS APPLICATION PROCEEDS SO THAT IT WILL NOT BE HELD UP FOR THIS TO CATCH UP.

Applicant's Response: The applicant intends to request impact fee credits and this has been a component of discussion with all the agencies. As we continue to work toward acceptable Development Order commitments, the establishment of these credits will be a component of those commitments.

The applicant acknowledges the need to process the CIE amendment with the comp plan and in conjunction with the DRI.

Some of the project share cost tables include ROW acquisition and some do not; some of these may be more substantial than the actual construction costs (esp. in developed areas; I-95, US-1, etc). For state roads, FDOT will have to be directly involved in the ROW acquisition from 3rd parties, and should concur on the estimates.

PLEASE ADVISE AS TO YOUR DISCUSSIONS WITH DOT REGARDING THIS ISSUE AND RESOLUTION THEREOF.

Applicant's Response: With a change in the development program, the cost share tables have also changed. Please review the updated information. We have met with the County and DOT about the new transportation analysis and proposed mitigation which focuses the financial commitment towards the I-95/207 interchange, 207/305 intersection and on-site ROW reservation for the future Watson Road extension. As such, the ROW acquisition will no longer be of concern as the only offsite ROW acquisition may potentially occur at the I-95/207 interchange. An IMR will be the first step in determining this, but preliminary analysis indicate that ROW acquisition won't be required. If it is, it will be integrated into the interchange construction cost.

The police/fire agency letters do not appear to say that they have the current capacity to serve the project, contrary to the statements contained on pg. 25.1, absent the provision of new sites.

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PLEASE PROVIDE AN UPDATE ON THE PROGRESS OF THIS DIALOGUE AND YOUR PROPOSALS/SUGGESTIONS TO MEET THIS NECESSARY ELEMENT.

Applicant's Response: The applicant met with representatives from the Sheriff's Department and Fire Services Department on October 9, 2007. Discussed was the need for a 5 acre law enforcement facility, a 3 acre fire facility, or 7.25 acre site if combined. Location of the facilities on or off-site was reviewed and the limitations for locating fire services westward of CR 305 to meet spacing criteria. Regardless of location, if accessing SR 207, a median crossing is required. A "template" site plan was provided to us for law enforcement sizing. Timing of donations and impact fees were also discussed. We have preliminarily reflected a site for joint fire and law enforcement use meeting the criteria described as reflected on Map H. This proposed location needs to be reviewed and the applicant will continue to work with both the Sheriff's Department and Fire Services staff through the Development Order process to finalize methods for resolving service needs.

Please confirm w/ SJC Aff. Housing local methodology and data regarding affordable housing needs.

PLEASE CONTINUE THIS DIALOGUE WITH TOM AND COME TO AN AGREEABLE PROPOSAL.

Applicant's Response: Acknowledged. The applicant met with Tom Crawford on September 28, 2007 to continue dialogue on meeting affordable housing needs. The applicant is presently researching alternative options proposed at that meeting and will continue to coordinate with Housing Services staff regarding affordable housing as part of the Development Order process.

DEVELOPMENT SERVICES

TRANSIT

2. To be consistent with recently approved Development Orders the transportation mitigation plan should include a contribution to St Johns County Transit.

1/18/2007 - Numerous factors can facilitate the use of public transportation. The first factor is individuals unable to drive such as elderly and school age children. The second factor is individuals needing to access work but do not receive enough income to operate a vehicle. Both these categories of individuals are noted in Table 10-5 (Demographic Projections) and table 10-10 (Expected Employment by Job Type). We recommend a

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developers contribution of \$25,000 for each phase of development to be paid when building permits are issued.

Applicant's Response: Our project is integrating alternative modes of transportation throughout the community. In addition to the roadways, this will include multi-purpose pathways, electric vehicle drive lanes, trail head parking providing access to the Rails to Trails and Greenway Corridor Trail. We have programmed to provide a transit stop within the town center portion of the project. These elements address alternative transportation within the community, and we encourage the County to provide transit from the DRI to the region at large through ridership fees or other sustainable methods.

Information Only:

1. The project design should include accommodations for transit service including bus bays and stops. A bus bay using Jacksonville Transportation Authority standards is needed near the location of the shopping area. Bus stops to include a 6'X 16' concrete pad for future bus shelters, should be designed in high use areas connected to a sidewalk and must be handicap assessable.

1/18/2007 - Insure language to design accommodations for transit service including bus bays and stops as identified in first comment be included in development order.

Applicant's Response: Acknowledged.

PUBLIC LIBRARY SYSTEM

This memo is to reiterate and confirm my position that was stated on page 9 of the *Elkton DRI – First Sufficiency Response*, that I do like the location and program of the proposed Elkton Development in concept. Additionally, at their regular meeting of December 13, 2006, the Library Advisory Board voted unanimously to support further exploration and discussion of the Elkton DRI to consider possible location of a stand-alone library facility. Such a facility would be considered for the provision of Library Services for the Hastings – Southwood Preserve service area of St. Johns County.

Applicant's Response: The applicant met with Mary Jane Little and Teresa Bishop on October 3, 2007. At that meeting, the possibility of an off-site library facility in the Hastings area was discussed. The applicant is committed to ensuring that library service needs are met and will continue to work with the Library Services Department through the Development Order process.

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ST. JOHNS COUNTY SHERIFF'S OFFICE

Table 10-1 (page 10.3) has a 2007 start date for Phase 1. Is this still a realistic date, or should the start and finish dates be adjusted?

Applicant's Response: As discussed at the meeting, the 2007 start date isn't realistic. Since all of our programming and studies have been based on this date, we chose to leave that date as is for continuity in review. We understand that through the Development Order process we will need to adjust the date accordingly.

Although the tables previously noted in our September 6, 2006 response have been renumbered, it still appears that outdated data continues to be relied upon to project population, demographics and law enforcement impact fees. Specifically, Table 10-4 (page 10.4) uses BEBR information (bulletin 142 – volume 28) released in 2005. BEBR has since released updated revisions (bulletin 145 – volume 39) in June 2006. Population projections in this current release are larger than those depicted in 10-4. Please consider revising the table to reflect the current information.

Applicant's Response: The population projections have been updated using the most recent publications by BEBR. The table below summarizes the updated population and demographics for the project.

	Total Dwelling Units		Persons Per Household (1)	Total Population	Students per Household (2)		Total School Age Children	Elderly per Household (3)	Total Elderly
	MF	SFD			MF	SFD			
Phase 1 2007-2011	70	775	2.42	2,045	0.295	0.410	338	0.40	28
Phase 2 2012-2016	280	1,100	2.42	3,340	0.295	0.410	534	0.40	111
Phase 3 2017-2021	250	1,125	2.42	3,328	0.295	0.410	535	0.40	99
TOTAL	600	3,000	2.42	8,712	0.295	0.410	1,407	0.40	238
(1) 2007 Florida Population Studies: Number of Households and Average Household Size in Florida: April 1, 2006, Bureau of Economic and Business Research, University of Florida (Vol 40 - Bulletin 146) U.S. Census Data, Census 2000 used to adjust total population for seasonality (2) Public Schools' Student Generation for South Mainland Sector provided by St Johns County School Board (3) 2007 Florida Population Studies, Population by Age, Bureau of Economic and Business Research, University of Florida									

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Table 10-11 (page 10.26) appears to utilize outdated impact fees. Rate changes became effective on October 1, 2006. If old data was used, please adjust the table to reflect current data.

Applicant's Response: The impact fees used were the most recent. However, minor increases have since been made to account for inflation. The most recent impact fees have been used in this updated fiscal impact model.

Further, assuming that any corrections and/or modifications to the above do not substantially change the projections, our revised comments are:

- We still anticipate the need for a regional command center in the southern portion of the county to better serve a growing population and continue to deliver community level programs, perhaps to be constructed during Phase 1 of this development.
- Based on a joint meeting on December 11, 2006, with Fire and Rescue Services and the applicant's representatives, it appears that a ten (10) acre nearby off-site parcel for co-location of public safety facilities should be further explored by the applicant in lieu of the on-site regional command center land donation previously discussed. Such a coordination of effort best serves the citizens of the region where Southwood Preserve will be built. This does not preclude a law enforcement storefront within the town center, which will be of mutual benefit to everyone, and keep more in the architectural spirit of the project.
- We will continue to request an accelerated payment of impact fees to ensure a funding stream to assist with a timely construction of a regional command center.

Applicant's Response: The applicant met with representatives from the Sheriff's Department and Fire Services Department on October 9, 2007. Discussed was the need for a 5 acre law enforcement facility, a 3 acre fire facility, or 7.25 acre site if combined. Location of the facilities on or off-site was reviewed and the limitations for locating fire services westward of CR 305 to meet spacing criteria. Regardless of location, if accessing SR 207, a median crossing is required. A "template" site plan was provided to us for law enforcement sizing. Timing of donations and impact fees were also discussed. We have preliminarily reflected a site for joint fire and law enforcement use meeting the criteria described as reflected on Map H. This proposed location needs to be reviewed and the applicant will continue to work with both the Sheriff's Department and Fire Services staff through the Development Order process to finalize methods for resolving service needs.

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St. Johns River Water Management District

Question 13 – Wetlands

The applicant should note that while the upland buffer requirements for St. Johns County allow for a minimum buffer width of 10 feet, subsection 12.2.7(a) of the Applicant’s Handbook requires a minimum buffer width of 15 feet to preclude adverse secondary impacts; otherwise, mitigation may be required.

Applicant’s Response: The applicants has taken this comment into advisement, and will propose the provision of upland buffers at 15’ minimum, 25’ average width in compliance with 12.2.7(a), A.H. to eliminate and reduce adverse secondary wetland impacts to the maximum practicable extent during ERP permitting. These upland buffers will be proposed where practicable, and if there are areas where this buffer provision is not practicable, the applicant understands that additional mitigation to offset adverse secondary wetland impacts may be required by SJRWMD at that time.

Question 14 – Water

Water quality data from the District’s Regional Groundwater Monitoring Network indicates the Floridan Aquifer is likely to be potable in the area of the Southwood Preserve DRI and therefore should not be used for landscape irrigation purposes.

Applicant’s Response: Acknowledged.

Question 17 – Water Supply

We note that the District relies on the GIS-based Water Resources and Agricultural Permitting and Planning System (GWRAPPS) irrigation model, not the Agricultural Field Scale Irrigation Requirements Simulation (AFSIRS); although the amount allocation by AFSIRS will not vary significantly from GWRAPPS. GWRAPPS takes into account the native soils and Doppler-based actual rainfall in the area.

Applicant’s Response: Irrigation estimates are based on the original ADA comment indicating irrigation should range from approximately 26 to 32 inches per acre per year according to AFSIRS model. Comment acknowledged.

Table 17-1: The assumptions reflect a use rate of 100 gallons per capita per day (gpcd) for potable water. With the new, more water efficient plumbing devices, the gpcd usage rate should be in the range of 55 – 70 gpcd. The table should be revised to reflect that rate. A conservative estimate for engineering purposes might use the high-end number of 70 gpcd.

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Applicant's Response: The potable water demand levels used for Table 17-1 are based on the St. John's County Utility Department's Schedule A - Water and Sewer Flow and ERC Factors by Use Type of County Ordinance 2006-73. These numbers were established by the Utility Department based on the actual flows from existing users and are conservative for preliminary engineering purposes. We acknowledge the fact that these numbers may be higher than the actual flows generated by the site, but for preliminary planning purposes, these are the numbers required by the SJCUD.

Please note that the Southwood Preserve DRI plans to implement an education program making information available to homeowner's on how to implement water conservation measures on their home.

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Florida Department of Environmental Protection

The Northeast District Staff has reviewed the Elkton DRI first sufficiency response. Based on the information provided, the applicant has committed to the following: a Water Quality Monitoring Plan, the Site Assessment Report and the groundwater monitoring data. Once this information is received and thoroughly reviewed, the Department will provide additional comments and recommendations on this project.

Applicant's Response: Please see the Water Quality Monitoring Plan enclosed as Tab E of this document.

As stated in our first Sufficiency Response, the answers provided in ADA Questions 10, 12, and 13 represent the results of all vegetation- and wildlife-related Environmental Reports and Surveys, and the sole deliverable and summary of this information associated with the Southwood Preserve DRI. The responses to these ADA questions were determined through strict adherence to the survey methods and deliverable results mandated in the Florida Fish and Wildlife Conservation Commission's (Formerly Florida Game and Fresh Water Fish Commission) *Wildlife Methodology Guidelines for Section 18 (D) of the Application for Development Approval* (January 1988). The additional Phase I Environmental Audit has already been forwarded with the ADA submittal for your review. We encourage FDEP to review the responses to ADA Questions 10, 12, and 13 in their effort to review current in-situ vegetative and wildlife conditions of the property associated with this DRI.

Florida Department of Transportation

I.) General Comments & Concerns:

1.) SIS facilities: The Elkton DRI is located in an area that affects a number of State facilities which are designated as part of the Strategic Intermodal System (SIS), such as **SR 207 (SIS facility), I-95 (SIS facility), US 17 (an emerging SIS facility)**. The Department is concerned with the impacts on these SIS facilities as well as additional State roads SR 206, US 1, and SR 312. We are especially concerned also with the associated interchange at SR 207 at I-95 and SR 206 at I-95. The Applicant's analysis shows that the SR 207 at I-95 interchange, currently a tight diamond, will experience massive failures in the future. The Applicant has suggested improvements that would require widening the interstate overpass, yet this is not included in a mitigation plan. Applicant should consider mitigating its impacts to these facilities.

According to the *Transportation Uniform Rule* (Chapter 9J-2.045 FAC):

The schedule [of facility improvements] shall ensure that each and every roadway improvement which is necessary to achieve the adopted level of service standard for that project stage or phase shall be guaranteed to be in place and operational, or under actual construction for the entire improvement, at build-out of each project stage or phase that creates the significant impact. This guarantee shall be in the form of...

(III) A local government commitment in the current year of their local government comprehensive plan Capital Improvement Element (CIE) to provide all needed roadway improvements, or a local government commitment in the current three years of their CIE to provide all needed roadway improvements when the local government has specifically adopted an in-compliance paragraph 9J-5.0055(3) (c), Florida Administrative Code, concurrency management system in their plan; or
(IV) A Florida Department of Transportation commitment in the current five years of the Adopted Work Program for Florida Intrastate Highway System (FIHS) facilities or in the first three years of the Adopted Work Program for all other facilities to provide all needed roadway improvements..."

The Proportionate Share tables (6 and 7) and the applicant's own analysis identified SR 207 as significant and adverse with a need to 6 or 8 lane a number of links. Applicant needs to address the ultimate needs of the road and the interchange at SR 207 and I-95.

- **Mariposa:** As you know, the Mariposa DRI which is located in Putnam County but also accesses SR 207 and impacts the road and the interchange at I-95 is planning to contribute about \$5.5 M toward the ultimate needs of the interchange at SR 207 at I-95. The Mariposa Applicant have also agreed to conduct an Interchange Operational Assessment Report (IOAR) We therefore strongly urge the Applicant to provide for the ultimate improvements needed for the interchange from Applicant's proportionate share to mitigate its impacts.
- **Transportation Group:** A development agreement has been recently reached by a Development Group for a set of improvements along SR 207. The Department is

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not a party to this agreement; however, the improvements are certainly of great interest to FDOT. We request the Applicant in coordination with the County provide the list of improvements agreed upon and address them as they relate to the analysis of the Elkton traffic, and the necessary improvements needed to mitigate the Elkton development's impacts.

- **SR 312:** It should be noted that the Department plans show that SR 312 will be Limited Access facility as an important bypass as requested by the Johns County support. The applicant's Table 21-11 shows the need to 6 lane link 112 and 8 lane links 113,114.1 and 114.2. for a total estimated cost of over \$63M but with an estimated Proportionate share of only \$6.2 M. We must recognize that the road is crucial to the County's over all networks and the need to 8 lanes this road seems very unlikely within the time frame of the Elkton development. What can be done to minimize the impacts and the capacity needs on this facility.

It is important to recognize that the interchange of SR 207 at I-95 is soon approaching the same improvements' needs as CR 210 and I-95. The Applicant is already showing (Table 21-7) that links of SR 207 (#107.3, 109 and 108) are failing and based on FDOT's analysis they will need 6 lane or 8 lane capacity due to the impacts of the Elkton development. Thus, Traffic will continue to flow easterly to I-95 as more development get approved along SR 207. To prevent future disaster at the interchange, we need to all work together to minimize the impacts and provide for the ultimate needs of the interchange SR 207 at I-95. Applicant should contribute funds or construct the necessary improvements of the interchange and the links along SR 207. Impacts to all the SIS facilities must be mitigated. The Applicant is proposing to pipeline its mitigation. We support the approach but would like to insure that the SIS facilities are addressed accordingly.

Applicant's Response: Acknowledged. The applicant recognizes the importance of both the I-95/S.R. 207 interchange and S.R. 207 SIS facility to the region and intends to direct a majority of mitigation dollars to address the interchange. The applicant will proactively coordinate with FDOT, St. Johns County, and any other applicable parties to develop a comprehensive solution to address the critical needs of the interchange and to ensure that Southwood Preserve (formerly "Elkton")-related development impacts to the S.R. 207 are also fully mitigated.

The applicant has incorporated the Mariposa traffic impacts into the analysis consistent with their development phasing and intends to direct a substantial amount of its mitigation dollars to provide both long-term and short-term improvements to the interchange.

The analysis provided incorporates the proposed corridor improvements contained in the Development Agreement (DEVAGREE 2006-12) with the S.R. 207 Corridor Improvement Group. Approximately \$2.2 million has been allocated for ramp improvements at the I-95/S.R. 207 interchange. A copy of the agreement is included with this response.

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The proportionate share costs calculated for S.R. 312 reflect an 8-lane improvement cost associated with total traffic impacts that exceed the 6-lane maximum service volume at the adopted LOS. This is consistent with the FDOT traffic impact study methodology and incorporates the latest generalized MSV tables. The applicant's revised development program, however, results in no significant or adverse impacts to link 114.2, as shown in Table 21-7, which is part of Tab C.

2.) Costs of Improvements:

As you all know, the cost of land and infrastructure construction have increased in recent years substantially. Consequently, the Department has had to revise its approach to estimating the costs of any road construction. Therefore, the Department has published more reasonable cost which were adjusted by the inflation rates and updated according to more realistic factors. Thus the new 2006 costs should be used for the proportionate shares estimates.

- The Department has provided (in Section III hereafter) proportionate share cost of improvements in two scenarios; the first scenario (Attached Table-6) is based on the earlier estimates with the 2004 base year adjusted by inflation rates; and the second scenario (attached table-7) is based on the recently updated 2006 estimated cost of improvements. The Department and St. Johns County strongly recommend the applicant utilizes the updated 2006 costs to calculate the final proportionate share.
- There are a number of Bridges that will be impacted by the development have been shown in applicant's Tables 21-9 and 10 but no source was given to determine if these costs are realistic. These include, the bridge on US-1 (north of King Street), SR 312 overpass (R/R) east of SR 207, and the SR 206 bridge over the Deep Creek. Costs of Bridges/overpass and associate right-of-way should be addressed and revised based on current costs. Also the Applicant's improvements have included the assumed widening of the I-95 overpass at SR 207, yet no cost is shown.
- Right-Of-Way: Applicant states (page 34) that "The FDOT plan sheets indicate the presence of sufficient right-of-way for SR 207 segments west of I-95". The ultimate needs of the interchange (SR 207 at I-95) may eventually require additional right-of-way as the traffic from newly approved developments in this area impact this interchange. Currently there are few on going studies (Short term and long term) Mariposa IOAR, and the I-95 Master Plan. Therefore, if an Interchange Modification Report (IMR) t is performed to assess the total needs and the final foot prints of the modified interchange then maybe additional right-of-way may be necessary. Any associate costs should be established upon current appraisals. We recommend the Elkton Developer contributes funds from its proportionate share toward the ultimate needs of the interchange.

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Applicant's Response: The applicant has utilized the updated 2006 estimated cost of improvements in the revised analysis submitted for your review.

The latest published (2006) statewide generic cost per mile models do not include estimates for bridge structures, thus the bridge costs were calculated based upon the 2004 Transportation Costs book and applying the appropriate inflation factors provided on page 17 of the book to account for the following three years. The applicant's proposed mitigation plan for the interchange will account for both S.R. 207 and the I-95 overpass.

As stated, the applicant fully intends to contribute a substantial portion of its proportionate share to address the I-95/S.R. 207 interchange. This includes planning, engineering, permitting, and construction, in addition to accounting for potential right-of-way acquisition.

3.) Maximum Service Volumes (MSV):

The applicant has not addressed the Department's request to be consistent with our MSVs on the State Roads and in Particular on the SIS facilities as we have commented earlier (in the ADA), and the applicant is still submitting analysis with incorrect maximum service volumes to determine available capacity. Therefore, we find the submittal incorrect and request the applicant respond to our request to be consistent with FDOT's MSVs on the State roads. The methodology as agreed to in the pre-application meeting requires the applicant to use FDOT LOS and MSVs for SIS facilities, and the local government adopted LOS Standard with FDOT MSVs for non-SIS State roadways. At this point, the additional links (except for 107.2) the Department finds significant and adverse are due to the difference in MSVs. These are State roads and as such the Department will not accept deviation from our methodology as we discussed at the methodology meeting. The applicant must revise its analysis (technical comments addressed hereafter) and use the FDOT's MSVs for all State facilities.

Applicant's Response: Acknowledged. The applicant will specifically address the technical comments as they relate to maximum service volumes in Section II.

4) Access Plan:

The Department is concerned with the proposed access plan. The current Master Plan (Map H) shows much of the retail uses to be adjacent to SR 207 with two direct access/driveways. The Traffic circulation pattern of the development prevents the new residents from moving within the development, it specifically shows the residents accessing directly SR 207. We recommend the applicant reconsiders its connection plan and allows the northern driveway and internal road to connect directly to new development road as it connect to CR 305, creating a bypass and eliminating many trips from accessing SR 207 only to go back to CR 305. Please note, the major intersections on to SR 207 must be approved by the Department and should be designed according to FDOT's standards at the Developer's expense.

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Applicant's Response: The connection plan and traffic circulation pattern does permit residents internal access to the commercial center without the need to access S.R. 207. In addition, there are two access points along C.R. 305 which will enable residents to connect with the commercial center and residential uses without accessing S.R. 207. The intersections proposed along S.R. 207 will be designed according to FDOT standards and access management guidelines.

5. Insufficient Information:

The Applicant did not provide the mitigation plan with this submittal. The Applicant has stated that they are working with FDOT and the County to provide a mitigation strategy, yet the Department has not been contacted by the Applicant regarding this project's mitigation plans or about any proposed regional improvements to offset the impacts from this development.

Applicant's Response: The applicant discussed a proposed mitigation program with FDOT at a meeting on October 12, 2007. The proposed mitigation program includes the planning, engineering, permitting, and construction of the I-95/S.R. 207 Interchange. The applicant will continue to coordinate these efforts with FDOT and the County to ensure that the Southwood Preserve (formerly "Elkton") impacts are accounted for with respect to the interchange and the S.R. 207 SIS facility.

II.) Technical Comments:

1. Trip Generation, Internal Capture, and Pass-By:

The Department reviewed the revised trip generation and has no further comments. **Table 2: Trip Generation, Internal Capture, and Pass-By** presented below shows the final estimated total daily, AM and PM trips to be generated by the Elkton Project. These are as follows:

Table 2: Trip Generation, Internal Capture, and Pass-By

	Without Internal Capture and Pass-By			Internal Capture			Pass By	With Internal Capture and Pass-By		
	AM Peak	PM Peak	Daily	AM Peak	PM Peak	Daily		AM Peak	PM Peak	Daily
Phase 1	1,432	2,025	20,094	68	378	3,810	114	1,364	1,533	16,284
Phase 2 (cumulative)	2,261	3,084	31,577	86	548	5,752	114	2,175	2,422	25,825
Phase 3 (cumulative)	4,083	4,137	43,480	108	714	7,378	114	3,975	3,309	36,101

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Applicant's Response: Acknowledged.

2. Traffic Projections:

The Department still has concerns with the applicant's trend analysis, and we disagree with the trend analysis for the links listed in **Table 3: Background Link Discrepancies**. The *FDOT District 2 Level of Service Report Summary 2004* dated July 2005 (approved at the pre-application meeting) lists the appropriate count stations to use for these links. The applicant should make the appropriate changes to *Appendix 21-D3: Historical AADT on Roadway Links* and *Appendix 21-D2: Projected Daily and Peak Hour Background Traffic for 2007 and 2001 AADT*. These changes should filter into the applicant's traffic projection analysis.

Table 3: Background Link Discrepancies

Link ID	Roadway	Segment	FDOT 2004 AADT	Applicant 2007 AADT	FDOT 2007 AADT	Comment
SA-70	SR A1A	SCL of St. Augustine to Bridge of Lions	25,625	24,700	25,700	This link is an average of four count stations.
117.2	US 1	Shores Boulevard (S) to Wildwood Drive	29,651	28,900	32,000	This link uses two count stations: 780064 and 780311.

Applicant's Response: For Link SA-70, the applicant utilized the correct AADT counts to perform the trend analysis for the background traffic, as provided in the most recent 2005 Level of Service Report Summary dated 6/1/2006. According to the Report, the 2004 AADT of 25,600 is more than the 2005 AADT of 24,100 (averaging to the nearest 100). This fluctuating pattern is exhibited throughout the period from 1995-2005 along this segment. Upon inputting these volumes (as shown in Appendix 21-D3 within Tab C) into the FDOT TRENDS regression model spreadsheet (included in Tab E of the 1st Sufficiency Response), the background traffic estimates prepared for the beginning of 2007 are less.

For Link 117.2, the applicant utilized the St. Johns County Transportation Analysis Spreadsheet for the AADT volumes (as included in Appendix 21-D3) since the County has a station located in between Shores Blvd. and Wildwood Drive. It was determined that this would provide a more accurate assessment of the volumes for the purpose of the trend analysis, as opposed to averaging the volumes of the provided FDOT stations that are not even physically located within the segment. In addition, as stated in the 1st Sufficiency, the two FDOT stations provide a range of values that would be statistically erroneous to average (19,000 and 41,000), while FDOT station 780311 is located 2.81 miles north of Wildwood Drive.

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3. Link Analyses, LOS and MSV:

The Department has some concerns about the maximum service volumes (MSV) on State roads. **Table 4: Maximum Service Volume Changes** below, shows the links, the level of service (LOS) standard in the adopted comprehensive plan, the applicant’s MSV, and FDOT’s MSV based on the comprehensive plan LOS standard. The applicant should revise the analysis with the correct MSVs as presented in FDOT’s tables.

Table 4: Maximum Service Volume Changes

Link ID	Roadway	Segment	Comp Plan LOS Standard	Applicant MSV	FDOT MSV	Comments
100	SR 206	CR 305 to I-95	C	1,590	1,130	LOS Standard is C 17,000.
101		I-95 to IS 1	C	1,590	1,130	LOS Standard is C 17,000.
102		US 1 to Urban Boundary	C	1,590	1,130	LOS Standard is C 17,000.
102.1		Urban Boundary to SR A1A	C	1,590	1,210	LOS Standard is C 18,900.
110	SR 207	Holmes Blvd. to SR 312	D	5,870	3,390	Class I arterial
117	SR 5 (US 1)	SR 206 to Pepper Rd.	D	5,420	3,290	

Applicant’s Response: The applicant maintains that the St. Johns County Comprehensive Plan LOS Standard for links 100, 101, 102, and 102.1 is “D” and will be evaluated as such. With the exception of SIS facilities and limited or controlled access FIHS facilities, the methodological standard prescribed in the FDOT Quality/Level of Service Handbook is to defer to the local comprehensive plan LOS standard:

“Florida Statutes, 163.1380(10), require local governments to adopt the level of service standards for the Florida Intrastate Highway System (FIHS). Local governments establish the adopted level of service standard on all non-FIHS roadways in their comprehensive plans.”

The applicant has adjusted the service volumes for links 110 and 117 based upon class and interrupted flow, although link 117 is characterized as uninterrupted flow in the 2005 LOS Report.

4. Transportation Modeling:

Movement of the project TAZs slightly to the north will result in link 107.2 to go significant and adverse in the build-out year. The way the Applicant has positioned the project TAZs

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(arbitrarily), the link 107.2 is within 6 trips of failing. Therefore, since the applicant has tripped link 107.1-B and 107.3 it can be logically assumed that the Applicant would trip 107.2. Also, the Department shows the applicants links 107.1 through 107.3 as one link from CR 305 to I-95, and the argument could be made that the Applicant is responsible for the entire link.

If the Applicant accepts the responsibility for their link 107.2, the Department does not see the need to rerun the project models.

Applicant's Response: There is a degree of trip attenuation along this link as a result of coding Allen D. Nease Rd. into the model, per St. Johns County requirements. The applicant's revised development program, which results in less net external trips, no longer adversely impacts link 107.2.

5. Intersection Analysis:

Existing Conditions:

Ramps/Interchange I-95 @ SR 207 and I-95@ SR 206:

All intersection movements with a v/c ratio greater than 1.0 should be mitigated for and improvements proposed that the applicant can show corrects the deficiency.

The following intersection movements had v/c ratios greater than 1.0:

Phase I—(2007 – 2011)

- **I-95 SB Exit and SR 207:** SBR, NET, and SWL

Phase II—(2012-2016)

- **I-95 SB Exit and SR 207:** SBR, NET, and SWL
- **I-95 NB Exit and SR 207:** NBL, NBR, NEL, and SWT

Phase III—(2017-2021)

- **I-95 SB Exit and SR 207:** SBR, NET, and SWL
- **I-95 NB Exit and SR 207:** NBR, NEL, and SWT
- **I-95 SB Exit and SR 206:** NBL

Specific Comments regarding the Interchange: The Department is concerned about the SR 207 at I-95 Interchange. The Applicant's Synchro files with improvements do not correct the failing condition at the interchange. This intersection is currently a tight diamond and the future traffic projected for the interchange will create massive failures unless a long-term solution is found.

By 2021, the applicant shows a five-lane section on the southbound off with triple rights. While in Synchro this may appear to clear traffic from the ramp, the SR 207 mainline is terminally backed up.

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The Synchro files also show that backups from the dual lefts onto the northbound on ramp are backing up into the mainline.

The Applicant only provided a PM condition, and it can be assumed that in the AM, this movement will be complete gridlock. This occurs even though the applicant shows 10 lanes under the interstate overpass (6 through lanes and 2 left turns east and two left turns west).

This lane configuration cannot be built without widening the interstate overpass. Therefore, it is unclear if the applicant is planning on widening the overpass, because the LOS for all of the movements at the interchange will be operating at an F.

The applicant's analysis for the interchange shows that the interchange cannot accommodate the future traffic. This has not been addressed adequately by the applicant.

Applicant's Response: The applicant fully intends to direct the majority of its proportionate share dollars to the interchange. The applicant's preliminary mitigation proposal contemplates the reconstruction of the overpass to accommodate the requisite 6-laning of SR 207. The applicant has also conceptualized cloverleaf and diamond interchange alternatives, as well as specific ramp improvements; to the extent that future project and non-project related traffic impacts will be mitigated.

The Department has identified some issues with their HSC and Synchro output for the following intersections:

Phase III—(2017-2021)

- **State Road 207 and County Road 305 Intersection:** The HCS output in *Appendix X* does not match *Map 21-8: Critical Intersections Phase III Total Volume*. Figure 21-8 does not match the HSC output for the Eastbound and Southbound directions. EBR is not labeled and SBR & SBL are mislabeled.
- **State Road 207 and County Road 13 (Main St):** On the *Map 21-8: Critical Intersections Phase III Total Volume* the NBL is missing the output from HCS.
- **State Road 207 and US 1:** *Map 21-8: Critical Intersections Phase III Total Volume* indicates 653 EBR turns but the HCS output does not include any EBR turns.
- **State Road 206 and US 1:** The NBL is missing from *Map 21-8: Critical Intersections Phase III Total Volume*.

AM Build-Out Analysis for School Intersections (2021)

SR 207/CR 305 indicates a LOS B.

SR 207/Site Entrance indicates the WBL will be a LOS F in the AM.

Applicant's Response: The applicant has corrected these volumes where indicated, with the exception of the following: The 207/US 1 EBR is not included in the HCS output because it represents a yield condition with a

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channelized right turn. These movements do not impact HCS LOS outputs. The corrected map 21-8 is also included with Tab C of this submittal.

In addition, as a result of the applicant's revised development program many of the previously significant and adversely impacted segments are now projected to operate at an acceptable LOS.

III.) Proportionate Share and Mitigation Plan

1. Significant and Adverse links and the estimated Proportionate Share:

We have revised the Applicant's proportionate share tables and came to the following conclusions. Notice that there is one crucial link of SR 207 (link 110) which was omitted from the applicant's tables as described hereafter:

a) The Department has corrected the MSVs and finds the following State roadways significant and adverse in Phase 1 (2007-2011) of the project (links not included in Applicant's significant and adverse list are underlined):

- Link 107.3—SR 207, Cypress Links Blvd. to SR 9 (I-95)
- Link 108—SR 207, SR 9 (I-95) to Wildwood Dr
- Link 110—SR 207, Holmes Blvd. to CR 312
- Link 113—SR 312, County Road 5A to US 1

b) The Department has corrected the MSVs and finds the following State roadways significant and adverse in Phase 2 (2012-2016) of the project (links not included in Applicant's significant and adverse list are underlined):

- Link 107.3—SR 207, Cypress Links Blvd. to SR 9 (I-95)
- Link 108—SR 207, SR 9 (I-95) to Wildwood Dr
- Link 109—SR 207, Wildwood Dr. to Holmes Blvd.
- Link 110—SR 207, Holmes Blvd. to CR 312
- Link 112—SR 312, SR 207 to County Road 5A
- Link 113—SR 312 County Road 5A to US 1
- Link 114.1—SR 312, US 1 to Coke Road
- Link 114.2—SR 312, Coke Road to SR A1A
- SA-84—US 1, SR 207 to King Street

c) The Department has corrected the MSVs and finds the following State roadways significant and adverse in Phase 3 (2017-2021) of the project (links not included in Applicant's significant and adverse list are underlined):

- Link 99—SR 206, State Road 207 to County Road 305

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- Link 101—SR 206, I-95 to US 1
- Link 102—SR 206, US 1 to Urban Boundary
- Link 102.1—SR 206, Urban Boundary to State Road A1A
- Link H-13—SR 207, Hastings City Limits (W) to Hastings City Limits (E)
- Link 104—SR 207, Hastings City Limits (E) to State Road 206
- Link 107.1 B—SR 207, Site Entrance (E) to Vermont Boulevard
- Link 107.2—SR 207, Vermont Blvd to Cypress Links Blvd.
- Link 107.3—SR 207, Cypress Links Blvd. to SR 9 (I-95)
- Link 108—SR 207, SR 9 (I-95) to Wildwood Dr
- Link 109—SR 207, Wildwood Dr. to Holmes Blvd.
- Link 110—SR 207, Holmes Blvd. to CR 312
- Link 112—SR 312, State Road 207 to County Road 5A
- Link 113—SR 312, County Road 5A to US 1
- Link 114.1—SR 312, US 1 to Coke Road
- Link 114.2—SR 312, Coke Road to State Road A1A
- SA-84—US 1, State Road 207 to King Street
- SA-85—US 1, King Street to Castillo Drive

d) Based on the Department's analysis of the appropriate network we have developed **three figures** (dated 1/31/07--attached to this letter) illustrating the significant and adverse links by phase (Phase-I 2007-2011, Phase-II 2012-2016, and Phase-III 2017 -2021) due to the Elkton Development's impacts. As we stated numerous times above, the Department's primary concern is the SR 207 and the Interchange at I-95.

e) We have incorporated in this letter the recently updated transportation costs (attached **Table 5**) to be utilized in determining the development's proportionate share and the mitigation improvement cost. In order to show the difference in costs of projects we have provided two tables comparing the costs of 2004 vs. the updated 2006. Under the original cost structure the FDOT finds the Applicant's total proportionate share costs to be **\$66,834,280** (FDOT's **Table 6**, attached). Under the updated costs the applicant's total proportionate share costs to be **\$91,637,146** (**Table 7**, attached). The Department requests that our attached tables are included with any reproductions of our comments. Applicant should utilize Tables 5 and 7 to develop its final proportionate Share and mitigation plan.

Applicant's Response: The applicant's revised development program eliminates many of the previously significant and adverse segments. The revised future conditions analysis (Table 21-7) and the corresponding share cost summary tables reflect Southwood Preserve's (formerly "Elkton") newly projected traffic impacts, as well as applicant's proportionate share responsibility. These are all based upon the most current FDOT transportation cost projections.

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2. Mitigation Plan

The Applicant's submittal did not include a mitigation proposal. As we stated previously in our Section-I of this letter the Department strongly urges the applicant to consider a mitigation plan that remedies the impact on to SR 207 and contributes to the ultimate needs of the **Interchange at I-95 and SR 207**.

As we stated above the future traffic projected for the interchange of SR 207 and I-95 will create massive failures unless a long-term solution is found. The applicant shows a five-lane section on the southbound off with triple rights, but we expect the SR 207 mainline will be congested continually. We expect traffic to backup into the mainline from the dual lefts onto the northbound on ramp. The Applicant shows a need of 10 lanes under the interstate overpass (6 through lanes and 2 left turns east and two left turns west.), but this lane configuration cannot be built without widening the interstate overpass.

We therefore, recommend the Applicant considers the overall needs (ultimate plans) of the interchange and provide the appropriate mitigation plan to address this issue.

We appreciate the cooperation of the County and the Applicant in this matter. We need to work together to develop a plan that prevents the failure of SR 207 and the interchange at I-95.

Applicant's Response: As stated, it is the applicant's intention to direct the majority of its proportionate share contribution to address the I-95/SR 207 interchange. The proposed mitigation program contemplates the replacement of the I-95 Overpass structure, the widening of SR 207 under the overpass approximately ½ mile in both directions, as well as turn lane and ramp intersection improvements with mast arm signals and pedestrian cross walks. The LOS analysis for the interchange includes the FDOT I-95 Master Plan design volumes plus Southwood Preserve (formerly "Elkton") build-out volumes (20 year horizon) with the proposed configuration yielding an acceptable level of service.