



July 14, 2020

Mr. Stephen Schoen

Senior Planner

Walton County-Planning & Development Services

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Re: Draper Lake PUD

Project #: MAJ20-000005

Response to Comments Dated: June 19, 2020

Dear Mr. Schoen,

Please accept this letter as a response to the comments received for **Draper Lake PUD** project. The regular text font represents the county's comment, and the bold text represents our response.

PLANNING COMMENTS:

A. Relating to requirements for Conceptual Plan Approval

1. The Open Space area provided at 28.12 acres cannot be recreated with the figures provided within the conceptual plan. Please clarify the calculation(s).

The figure for Open Space area has been revised and the calculation has been provided in the Exhibit table and the PUD document.

2. Subsection (E)(8) on page 16 of the PUD documents refers to a minimum of 25% of the scrub habitat as being conserved as open space. The conceptual plan refers to 39.1% of the scrub habitat not being impacted. There are 12.46 acres of scrub habitat, 25% is 3.12 acres not 4.87. Please clarify how much scrub habitat will be impacted and preserved.

The figures for Scrub habitat have been recalculated and updated in the PUD document and exhibits.

3. Please provide the projected timeframes for the various development phases as identified within the Conceptual Plan. The response letter provided with the resubmittal, outlines the projected time frames, they are not however identified within the PUD application.

The PUD document has been revised to include the time line for both construction phases.

4. Clarify how the number of parking spaces for the amenity was calculated. The code requires 1 space per 200 square feet of gross floor area. Gross floor area for a pool facility includes the pool, pool deck including any additional seating area, and any other covered areas.

The calculation for pool parking is based on the pool size of 1,400 square feet. Therefore 7 spaces are required. The PUD document and Conceptual Site Plan have been updated to show vehicle parking as well as golf cart parking.

B. Relating to Zoning and Land Use: Small Neighborhood and Village Mixed Use and PUDs.

1. Small Neighborhood projects shall submit a detailed plan to demonstrate effective alternatives to buffering and separation of land uses. Please provide additional information on how the development will seek to affectively mix uses. This may be accomplished within the technical review phase of the PUD.

The PUD document has been revised to discuss the consideration of additional landscaping during the technical phase of the commercial development. In order to provide appropriate buffering between uses, fencing may be required during the technical review phase.

2. The Small Neighborhood zoning district requires 1% of the development project area to be devoted to civic, recreational, or community facilities. 1% of 35.19 acres is .35 acres.

The PUD's Deviation Table has been revised to include a request to use 9.98 acres as the development area rather than the entire site/parcel of 35.19 acres when determining the recreational use (i.e. pool amenity). One percent of 9.98 acres is 0.1 acre. Please see revised deviation table.

3. The private pool amenity will not count as credit toward the recreational fees due at platting.

Comment noted.

4. The Comprehensive Plan requires unique design features as an integral component of Planned Unit Developments.
 - a. Due to the nature of this site, i.e., the proximity to the Coastal Dune Lake, the abundance of wetlands, and the extent of Scrub habitat and in turn the difficulties the developer would face in seeking to develop these delicate areas, the preservation cannot be considered unique, it is a nearly inescapable part of this sites development.
 - b. Sidewalks are required components of residential developments, as are connections to adjacent pathways.
 - c. The roadway design, the building footprints and underground stormwater system, though somewhat distinctive in general, in light of the delicate nature of this property, appear more as mechanisms to stay out of the wetlands and in turn are not considered unique design features.

The PUD document has been revised to include details of the triplex building's unique design features as well as describe how other design features in the development minimize impacts on natural resources and are unique at the same time.

C. Relating to the Proposed Deviations from the Land Development Code.

1. In regard to the deviation requests concerning the minor development review to forgo the public hearing processes of the technical review components of this project, staff has determined that because of the delicate nature of the site and its degree of importance to the community, it would be a disservice to the public to support this deviation request.

Comment noted.

2. Please discuss in greater detail the requested 0' setback deviation for the residential structures in relation to Sections 5.00.03(A)(1). The applicant's response to staff's initial comments clearly identifies the reasoning behind the deviation request, the PUD documents do not.

The PUD document has been revised to clearly justify the request for the 0' setbacks. The 0' setback is being requested for the units only and not along the exterior boundary.

3. Please discuss in greater detail the requested 5' setback for the proposed commercial structure in relation to Section 6.10.01(A)(1) of the LDC. Staff concerns remain regarding the compatibility of the neighborhood commercial structure and the adjacent residential structures. Staff does not support this deviation request.

During the technical review process for the commercial development, special consideration of additional buffering and/or fencing will be taken into account.

4. Please discuss the requested deviations from Section 5.01.02, in particular, how the proposed commercial development will provide buffering alternatives between uses.

The PUD document has been updated to discuss the design plan during technical review and possibility of fencing and/ or added vegetation to buffer the different land uses.

5. In regard to the deviation request from the Small Neighborhood, five percent (5%) commercial area requirement, staff has determined that it would be inconsistent with the intent of the zoning district to allow for the density (residential component) to be calculated based on the entire development site but

allow the intensity (commercial component) of the commercial area to be calculated based on the proposed development area only. Staff does not support this deviation request.

This comment has been discussed with staff and further clarified.

6. In regard to the request for no minimum internal parking lot landscaping, this commercial development will be located at the main entrance of the development and will be highly visible from CR 30A. Staff does not support the requested deviation.

Comment noted.

7. Please provide additional commentary on the deviation requesting reduced commercial parking. Staff is concerned that the requested reductions in the various parking requirements that would typically apply to commercial development could prove to create insurmountable parking issues at buildout. Staff does not support the requested deviation.

Comment noted.

D. General Planning and Development Comments

1. Additional plantings within any required buffer areas may be needed to satisfy Section 5.01.08 of the Land Development Code.

Comment noted.

2. Consider a more Urban design with vertical mixed-use structures adjacent to 30A.

Comment noted.

3. Submit a valid water and sewer service availability letter from Regional utilities. The letter on file expired June 15, 2020.

A final letter of availability will be provided at the end of TRC review since they are only valid for 30 days.

4. Changes to the Concurrency Management System (CMS) have recently been approved and will be applicable as it pertains to the concurrency review of this project.

Comment noted.

5. To reiterate and expand upon comment C5 as it relates to the development's entitlements to density and intensity as well as the Code's mixture requirements concerning the civic/recreational uses, it would run counter to staffs current interpretation of the Comprehensive Plan and Land Development Code to allow different portions of the development site to be utilized to calculate the developments responsibilities.

This item has been discussed with staff and further clarified.

6. All portions of the site outside of the lands being utilized for development (infrastructure, buildings, parking, yards) be placed into a conservation easement.

In order to protect the wetlands and scrub habitat outside the development, the wetlands will be placed in a conservation easement and dedicated to Walton County. A six foot fence will be placed west of the development area and extend from the norther boundary to the most southern boundary. The PUD document has been updated accordingly.

7. Due to the delicate nature of the site and its importance not only to the environmental health of the dune lake but to the community at large, the proposed scrub habitat buyout may not be supported by staff.

Comment noted.

8. Staff strongly recommends that there be designated golf cart parking and that the Covenants and Restrictions adopted by the association restrict golf cart parking to these designated parking areas only.

Designated golf cart parking has been added to the Conceptual Site Plan at the pool amenity site and added to the PUD document.

9. Any potential preservation buyout is reviewed and approved by the Board of County Commissioners; it is not guaranteed.

Comment noted.

E. Development Related Fees.

1. Recreation Fee. To be determined.
2. Preservation Fee. To be determined.
3. Traffic Fee. To be determined.
4. Other, as appropriate.

ENVIRONMENTAL COMMENTS: (JUNE 18, 2020)

1. There is a documented historic resource shown on the Florida Master Site File on this property (Site ID: WL00836) that was not disclosed by the provided environmental assessment. Provide an archeological assessment and correspondence from the state Division of Historic Resources, Compliance Division, that the archeological site is appropriately considered in the PUD design.

Please see the revised Environmental Assessment for the archeologist assessment included in this resubmittal package. Please refer to Page 12 of 15 of WSI File #2012-080 where the cultural resource survey found no historical sites or structures on the proposed project site.

2. Below are the code and comprehensive plan requirements regarding historical resources:
 - a. 4.08.01(A) requires that the applicant notify the Florida Division of Historical resources and shall enter a binding agreement with the County in which the developer agrees to comply with the recommended course of action or mitigation requested by the Division prior to the development order being issued.
 - b. Objective C-1.5: To protect and preserve historic and archaeological resources. The County shall protect and preserve historical and archaeological resources within the County, by regulating development that may impact such resources.
 - i. Policy C-1.5.1: The County shall coordinate with the Division of Historic Resources to establish historic preserves or parks at sites of known historical or archaeological significance.

Please refer to the revised Environmental Assessment that finds no evidence of historical or archeological resources on the proposed project site.

FLOOD PLAIN COMMENTS: (JUNE 18, 2020)

The proposed development appears to meet the minimum Floodplain requirements of the Land

PUBLIC WORKS / ENGINEERING COMMENTS: (FEBRUARY 11,2020)

The Walton County Public Works Department has reviewed the engineering plans for the aforementioned project in regard to our area of review, which is typically limited to impacts to the County right-of-way. We have coordinated with the Planning Department's consultant, Dewberry Engineering, with any comments or concerns we have regarding this project and those comments are provided as part of their engineering letter.

911/GPS INFORMATION RESOURCES DEPARTMENT COMMENTS:

PENDING.

FLORIDA DEPT OF HEALTH COMMENTS: (NOVEMBER 12, 2019)

1. Draper Lake conceptual PUD - MAJ20-000005
 - a. The proposal will utilize public water and sewer.
 - b. Any proposed swimming pools may be considered a public swimming pool as per s. 514.011(2) Florida Statutes. Before construction of any swimming pool begins, the pool contractor will need to contact the Walton County Building Department and the Escambia County Health Department to determine if pool needs to be permitted and for approval of pool plans. The Escambia County Health Department phone number is (850) 595-6700. The address for the Escambia County Environmental Health Office is: 1300 West Gregory Street, Pensacola, FL 32501.

SOUTH WALTON FIRE DISTRICT COMMENTS: (JUNE 12, 2020)

This proposed project appears to meet our technical review approval at this time contingent on the following:
Fire Hydrants shall be listed /located no more than 500 ft (driving distance) from the furthest firefighter access point on any and all structures.

Dead-end roads more than 150ft shall be equipped with an approved fire department turn around for emergency apparatus.

Access roads shall be 20ft unobstructed width.

Access roads shall be accessible to fire apparatus once construction of structures begins.

Once access roads are developed, street signs shall be installed identifying each access road

A more detailed review shall be required for final SWFD approval.

WALTON COUNTY SCHOOL DISTRICT: (JUNE 10, 2020)

Draper Lake PUD, Permit #MAJ20-000005, is a proposed development with 138 multi-family, triplex homes within the South Walton County School Concurrency Service Area.

To estimate the impacts that proposed projects may have on the School District's educational facilities, the District uses student generation multipliers. The most recent multipliers were developed in 2019. The multi-family units are calculated at an overall 0.08 per unit according to the South Walton County 2019 multiplier. This multiplier is comprised of three smaller multipliers: 0.04 for elementary schools; 0.02 for middle schools; and 0.02 for high schools.

According to the multiplier, if the 138 multi-family, triplex units are developed the total estimated impact would be adding approximately twelve (12) student stations to the School District.

Based on the most recent student enrollment numbers, the current capacity for each school in the south end is as follows:

~ Van R. Butler Elementary currently at 104% (nearest elementary school to development)

~ South Walton High School at 92%

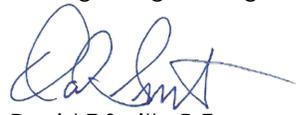
~ Emerald Coast Middle School at 80%

~ Dune Lakes Elementary School at 75%

The School District continues to collaborate with Walton County and developers to help address the rapid student growth across the district.

Please let us know if you have any questions.

Sincerely,
Innerlight Engineering Corporation



David E Smith, P.E.
Managing Director