



August 31, 2022

Mr. Paul Carlisle
City Manager, City of Sebastian
1225 Main St.
Sebastian, FL 32958

Dear Mr. Carlisle,

County staff appreciates the opportunity to provide our comments and suggestions for items to be incorporated into the annexation agreement between the City of Sebastian and the Graves Brothers. The annexation of a large parcel (1,984 acres) such as this presents a great opportunity to have a positive impactful development for the City and the County alike. We present these items in the spirit of collaboration and hope that we could discuss the rationale behind them with City staff as well as any mutually agreeable alternatives should the City not be supportive of including them.

We would like to reiterate that the County fully respects the City's home rule authority and right to make planning decisions regarding the future of the City. The suggestions below fall into two broad categories. The first category consists of comments that would enable the County to plan for the provision of various services within the annexed area going forward (e.g. water & wastewater service, some transportation improvements, fire rescue). The second category is purely "advisory" in that the County would like to see them to hopefully ensure a model development of the area for the future. These would be similar to what was asked of City residents at the annexation workshops held in June.

Suggested Annexation Agreement Items to Enable County Infrastructure Planning and Service Provision

- The overall density on the site will not exceed 3.0 residential units per acre. This would limit the site to no more than 5,952 residential units, which at an average of 2.5 persons per household would result in about 14,900 additional residents at buildout. Densities would vary across the project with higher densities in some areas balanced out by open space, commercial areas, and lower density residential areas. This limit would ensure that the overall density is somewhat consistent with existing densities in the City to help maintain the character of the area.
- Total commercial and industrial development limited to no more than 100 acres.

**OFFICE OF THE COUNTY ADMINISTRATOR
INDIAN RIVER COUNTY
1801 27th Street, Vero Beach, Fl. 32960-3388
PHONE: 772-226-1408**

Note: The density limits above will limit estimated water consumption to less than 2 million gallons per day (MGD). If the project were to develop at 10 units per acre (which we don't believe is the intent), this would result in approximately 5 million gallons per day of water consumption (not accounting for commercial development). For comparison purposes, the total consumptive use permit for the County Utility is limited to 12.8 MGD.

- Development within the area will need to provide for connection to pressurized County reuse, including all residential areas, for irrigation purposes. This will help the County in managing and preserving the limited water resources available.
- The owner shall provide a 75-acre parcel in an area mutually agreeable to the County and the owner for the siting of a water and/or wastewater treatment facility. Strategically located, this may also include reuse water pumping and/or storage facilities.
- The owner shall cooperate with the County to transfer ownership and/or capacity from any permitted wells on the property to the County Utility for water supply purposes.
- The owner shall provide land for a fire rescue station(s) based upon the overall density level. The current level of service per the most recent impact fee study is 1 fire rescue station per 10,548 residents. Based upon a 3.0 residential unit per acre density, this would require provision of 1 fire rescue station site in a mutually agreeable location. This could perhaps be collocated with the water/wastewater site.

The items listed above will help the County plan for infrastructure needs and enable the County to provide reasonable assurance to be able to serve the area as it develops. Additional site-specific requirements would be determined through the development (e.g. site plan) process as well.

Suggested "Advisory" Annexation Agreement Items

Below are the suggested "advisory" annexation agreement items with suggested draft language.

- The site shall be developed through the Planned Unit Development (PUD) process, and a comprehensive conceptual master plan, for the entire project area, will be approved by the City Council prior to any development of the project area.
- Mixing of Uses: Guidelines from County New Town Policies
 - Commercial, and office areas shall be provided at a ratio of three (3) to ten (10) acres per 1,000 residential units.
 - Residential use areas shall constitute at least fifteen (15) percent but not more than thirty-five (35) percent of the entire area.
 - Employment areas, including industrial, business, and office uses, shall comprise at least two (2) percent of the entire area.
- At least ten (10) percent of the total housing units shall be affordable and/or workforce housing units (Family income between 30 and 100 percent AML to ensure that there is housing available within the project area for workers employed within the project area.
- Open Space: At least fifty (50) percent of the entire area shall be preserved or provided as open space. Open space areas shall be retained as natural areas or used for

agriculture, recreation, stormwater management, or similar uses that complement the rural nature of the area.

- At least seventy (70) percent of the minimum required common open space area shall be located along main project boundaries and shall function as perimeter greenbelts. These required greenbelts shall include and be contiguous with the South Prong Slough Conservation Area.
- Such common open space shall not include conventional, individual private yard areas. Common open space areas may include agricultural areas, parks, and recreation areas, conservation and natural areas, and water bodies (not to exceed thirty percent of the open space requirement).
- Environmental: All onsite stormwater facilities shall utilize Florida Department of Environmental Protection Best Management Practices (BMPs) for stormwater pollution prevention in order to minimize impacts to the Sebastian River and Indian River Lagoon.
- The proposed development will provide the City and County with documents demonstrating compliance with Section 10.2.7 of the St. John's River Water Management District Applicant's Handbook regarding the potential for secondary impacts to wetlands. Additionally, should a Section 404 permit be required for development in federally jurisdictional wetlands, a copy of documents demonstrating compliance with federal guidance regarding the assessment of indirect effects and impacts in wetlands will be provided to the City and County.
- The transition of land use in uplands abutting headwater wetlands can alter groundwater recharge and surface water runoff regimes. As part of the environmental permitting process for the project, the developer will provide assurances to the City and County, through predictive watershed modeling, that hydrologic impacts will not occur to the County's South Prong Slough Conservation Area. This modeling shall provide data to establish the extent of required upland buffers, and other site design considerations that are required to maintain the hydrologic integrity of the South Prong Slough Conservation Area wetlands, and downstream areas.
- Transect/Form: The development shall, at a minimum, have a perimeter edge and a center. Along the perimeter edge a green belt as described above shall be established. The greenbelt shall consist of natural areas, agricultural areas, and/or "no-build" areas designated on large acreage parcels. A project center shall be established for the concentration of residential and commercial uses.
- Roadway Grid: The development area will include connections to CR 510, 82nd Avenue, and 69th Street as allowed in accordance with Chapter 14-97 of the Florida Administrative Code. Connections will also include extending the existing Sebastian roadway network south, including the extension of Laconia Street to CR 510. Additionally, the project design shall reflect the following:
 - A network of ungated and open to the public interconnected streets in a grid or modified grid pattern.
 - An interconnected pedestrian sidewalk/path system that serves and integrates residential and non-residential uses.

- Appropriately sized blocks and pedestrian improvements that provide a layout that maximizes residential development in clusters around town centers. Town center shall include but not be limited to public squares or parks, as well as commercial and residential uses. Blocks may be defined by streets or major pedestrian paths.
- Wide sidewalks, street trees, seven-foot bike lanes, and on-street parking shall be provided within the project center, and on all proposed access roads to and from the center in order to promote alternative travel.
- Timing of Land Uses: A sufficient amount of job-producing and non-residential uses shall be developed in initial project phases to prevent creation of a de-facto residential only or bedroom community and to ensure development of a job-producing "anchor tenant." No more than twenty-five (25) percent of the proposed residential use development will be permitted until at least twenty-five (25) percent of the proposed commercial, office, and light industrial uses occur.
- Low Impact Development (LID) techniques should be incorporated, such as vegetated filter strips at the edges of paved surfaces, rain barrels and cisterns, bioswales, residential or commercial rain gardens designed to capture and soak in stormwater, porous pavers, porous concrete, and porous asphalt, as well as green roofs.

Again, County staff appreciates the opportunity to provide input into this important process. We would like to discuss these suggestions with City staff at the appropriate time in an effort not to delay the process. We offer a spirit of collaboration to discuss alternatives to any suggestions that the City does not support in the hopes of reaching an annexation agreement that will help to provide a good result for the residents of the City and the County.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jason E. Brown', is written over a circular stamp or seal.

Jason E. Brown
County Administrator

Cc (via email):

City of Sebastian Council Members
Indian River County Commissioners
Phil Matson, IRC Community Development Director
Sean Lieske, IRC Utilities Director
Rich Szyrka, IRC Public Works Director
Dylan Reingold, IRC County Attorney