



April 22nd, 2021

Hand Delivery

Tom Reetz, Senior Planner
City of Stuart Development Department
121 SW Flagler Avenue
Stuart, FL 34994

RE: Kanner CPUD
Our reference number: 20-620

Dear Tom:

Please accept this correspondence as our formal resubmittal in response to the staff comments received on April 19, 2021. The response to the traffic comments have been addressed separately by Susan O'Rourke. Please find enclosed the original resubmittal packet containing the revised documents and plans referenced below, a CD with PDF copies of the resubmitted materials. The enclosed revised materials are listed as follows:

1. Response to traffic comments by Susan O'Rourke, dated April 21, 2021
2. Master plan, dated April 21, 2021;
3. AutoTURN exhibit for a fire truck, dated March 19, 2021;
4. Costco sign elevations, dated December 16, 2020;
5. Fuel station sign elevations, dated December 16, 2021
6. Tree Replacement- Innovative Stormwater Treatment Letter, Dated March 12, 2021
7. Traffic Signal Warrant Analysis, dated April 22, 2021
8. Kanner CPUD Traffic Analysis, dated April 21, 2021;
9. Kanner CPUD Land Use Traffic Analysis, dated April 21, 2021;
10. Landscape plan, dated April 22, 2021;

Itemized responses:

Engineering – Drainage/Stormwater

Site Plan

1. Original Comment 2: Provide entry features and outdoor patio of 200 sf at the Costco building in accordance with Section 6.05.06.
2nd Review Comment: There is a hatched area shown on the site plan, but it is not labeled.
Please label as 200 sf outdoor area.

Response:

Acknowledged.

2. Original Comment 5: Per Section 6.01.14.C.3.c, one cart coral shall be provided for every 25 parking stalls. Based on the parking of 720, 28 cart corals would be required.

2nd Review Comment: The City will include the deficit of cart corrals in the CPUD as a deviation from code.

Response:

Acknowledged.

3. Original Comment 7: In the parking calculations, provide justification for the 1.76 spaces per unit for Multi-family. The code is 1.5 per 1 bedroom and 2 per 2 bedroom. The breakdown of units was not found on the site plan.

2nd Review Comment: The City will include the deficit of residential parking spaces in the CPUD as a deviation from code.

Response:

Acknowledged.

4. Include in the revised memo a total tree mitigation cost to compare with the stormwater credit.

2nd Review Comment: The Applicant indicated a revised memo was included in the resubmittal, however, it was not included. Per discussion with Tom Reetz, the City needs to see the total tree mitigation cost to evaluate the potential credits for stormwater quality offsets.

Response:

The tree mitigation calculation has been provided on the landscape plans which include the 81% Nitrogen Removal Credit and Phosphorus Removal Credit from the Tree Mitigation Stormwater Letter provided by EDC.

Environmental Comments:

Initial Comment

Item 34A – Avoidance and Minimization and Other Environmental Impacts – According to the EA there are disturbed wetlands and surface waters on-site and pine flatwoods. The current site plan provides no avoidance or minimization of wetlands or native upland habitat. Also, there are some discrepancies on the acreage of wetland and surface waters in the information provided. The site plan references 8.33 acres of wetlands and surface waters. The EA references 8.67 acres in the text, 7.6 acres on Figure 5 and 8.32 acres on Figure 4 (Florida Land Use, Cover and Forms Classification (FLUCFCS) Map). This needs to be explained/corrected as it also affects preserve calculations for the site.

1.2019 Response: Though updated information has been provided in the Environmental Assessment (Revised December 2018), the wetland acreages still do not match. The wetland graphic attached to the South Florida Water Management District (SFWMD) informal jurisdictional determination (JD) shows 5.39 acres of wetlands and 0.78 acres of other surface waters and 2.5 acres permitted surface water management facility (8.67 acres total), while the text, FLUCFCS map (Figure 4) and Wetland Map (Figure 5) describes 5.27 acres of wetlands. It appears there is a discrepancy in the acreage of wetland 7 between the EA (3.17 acres) and the SFWMD maps (3.29 acres). The acreage of wetlands and surface waters provided on the site plan match the SFWMD map. This discrepancy needs to be explained.

Note: The Wetland Assessment Report provided with this response to comments does match the EA, but

does not match the SFWMD informal JD or Site Plan.

1.2021 Comment: The wetland acreages remain inconsistent, with the SFWMD ERP showing 5.59 acres of wetlands and 0.86 acres of 'other surface waters', while the environmental assessment mentions 6.5 acres of wetlands, and 4.1 acres of 'other surface waters', of which 3.7 is previously permitted. This discrepancy needs to be explained.

4.2021 Response: the discrepancy has been explained and it has been clarified that the SFWMD ERP acreage should be used over the EA acreage, as the EA acreage covers additional land. We have no additional comments.

Applicant Response:
Acknowledged.

Initial Comment

Based on the descriptions of the wetlands and upland habitat provided in the EA, the site has been highly disturbed and exotic and nuisance vegetation has reduced the quality of the habitat on-site. There is approximately 4.61 acres of pine flatwoods. Also, the wetlands and surface waters for the most part occur scattered throughout the center portions of the site, which may limit avoidance and minimization. However, an explanation should be provided to the City to describe why avoidance and minimization is not possible.

1.2019 Comment: An explanation has been provided and appears to be sufficient. In addition, a Wetland Assessment Report was submitted in response to the City's comments regarding the comprehensive plan compliance. This report demonstrates that all the wetlands are isolated and disturbed. The documentation provided in the Wetland Assessment Report appears to be complete and supports the low ecological value of the on-site wetlands.

1.2021 Comment: no additional comments.

Applicant Response:
Acknowledged.

Initial Comment:

Item 34B – On-site minimization. See comments in 34A. 1.2019

Comment: See comments above for item 34A.

1.2021 Comment: See comments above for item 34A.

4.2021 Response: no additional comments.

Applicant Response:
Acknowledged.

Initial Comment:

Item 34C- The site plan does not show any of the wetlands, surface waters or proposed preserve areas. The wetlands and surface waters and the impacts to such should be shown on the site plan.

1.2019 Comment: Comment not addressed. There are 3 features labeled as ponds shown on the site plan, but the wetlands have not been included on the site plan.

1.2021 Comment: comment not addressed, no wetlands have been included on the site plan.

4.2021 Response: All wetlands, regardless of planned impacts, need to be shown on a site plan for review.

Response:

The proposed site plan will result in impacts to all wetlands and all other surface waters. The wetlands proposed for impacts will be permitted through the SFWMD and proposed to be mitigated offsite at a mitigation bank (Bluefield Ranch) as was authorized in the original conceptual permit for the Kanner CPUD project. Existing wetlands are proposed for impact and thus are not shown on the site plan.

Initial Comment:

Item 34D – Partially complete. A FLUCFCS Map and descriptions and an aerial are provided in the EA. Please see comments in 34A above regarding the discrepancies in the acreages provided for the wetlands and surface waters.

1.2019 Comment: See comments above. There are still discrepancies in the EA and Wetland Assessment Report from what is shown on the SFWMD informal JD and the Site Plan

1.2021 Comment: See comments above, the acreage discrepancies still exist.

4.2021 Response: no further comments.

Response:

Acknowledged.

Initial Comment:

Item 34E – A preliminary wetland and surface water map was provided in the EA (Figure 5) and the report indicates that South Florida Water Management District (SFWMD) has field verified the line. The informal jurisdictional determination (JD) letter should be provided to the City when received. There is no indication or documentation in the materials provided as to the status of the US Army Corps of Engineers review or JD. There is no correspondence from Florida Fish and Wildlife Conservation Commission (FWC) or the US Fish and Wildlife Service (USFWS), but an opinion of the wetland habitat quality has been provided by a professional biologist. The wetlands and surface waters appear to be degraded and provide limited habitat value.

1.2019 Comment: The SFWMD informal JD has been provided in the response along with a discussion of coordination that has been initiated with USACE and USFWS. Response is sufficient.

1.2021 Comment: no additional comments.

4.2021 Response: no additional comments.

Response:
Acknowledged.

Initial Comment:

Item 34G – The EA provides a description of the native upland on-site – Pine flatwoods and provides a calculation of the approximate upland preserve required. But as described in 34A and in the engineering comments, there are discrepancies in the calculation of wetlands and thus the amount of preserve based on 25% upland preserve requirement. It does not appear that any native upland is being preserved, but instead the 25% is being achieved as perimeter buffers that are planted with native vegetation.

1.2019 Response: Based on the wetland discrepancies that remain the acreages in the EA and Site Plan do not match for upland preserve. However, the Site Plan does match the upland acreage based on the SFWMD informal JD.

1.2021 Response: Wetland discrepancies still need to get clarified to determine exact acreage requirements for upland preserve, however, the site plan does appear to provide enough acreage in the landscaping to satisfy this criteria.

4.2021 Response: no additional comments.

Response:
Acknowledged.

Initial Comment:

Item 34H – See comments for 34G. 1.2019 Response: See response for 34G.

1.2021 Response: See response for 34G.

4.2021 Response: no additional comments

Response:
Acknowledged.

Please feel free to contact me if you have any questions or need any additional materials.

Sincerely,



Doug Fitzwater
Copy to team