

**TO:** City Plan Board

**Item Number:** 1

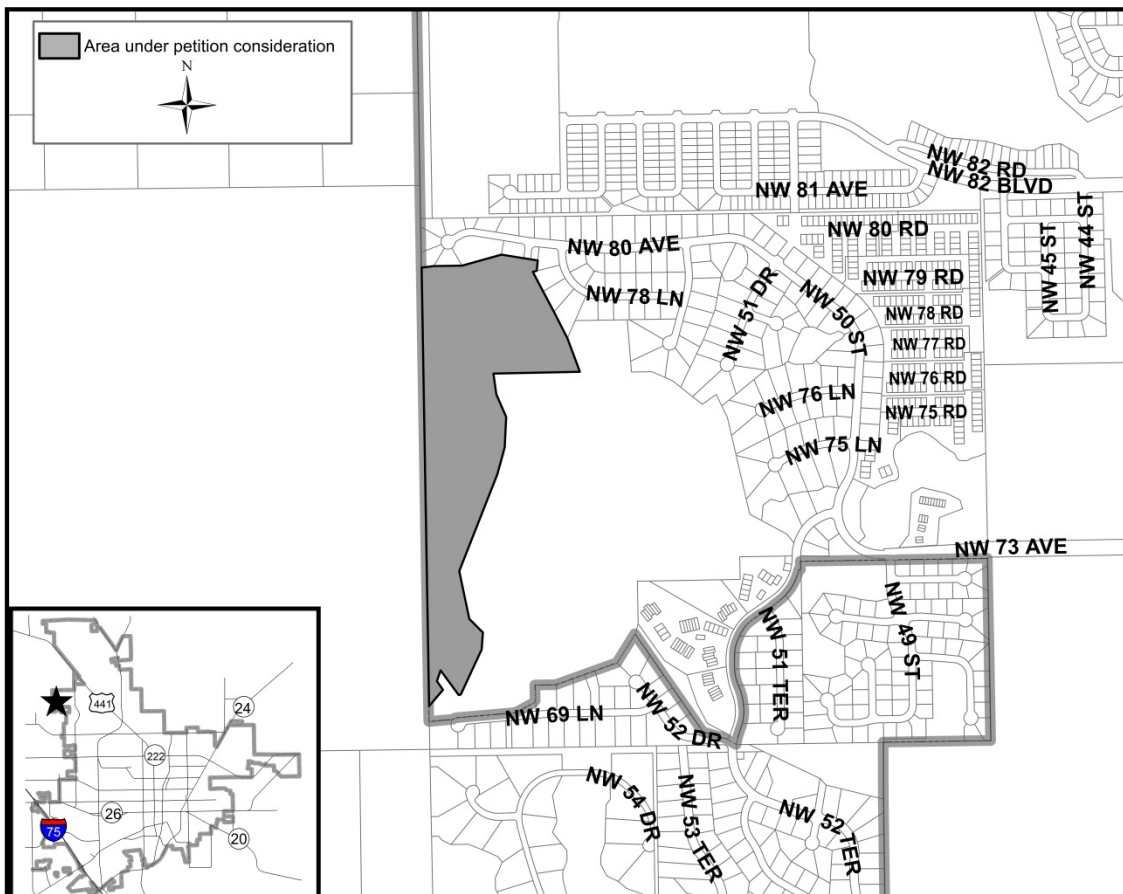
**FROM:** Planning & Development Services Department  
 Staff

**DATE:** Jan 28, 2016

**SUBJECT:** Petition PB-15-115 PDA, eda engineers-surveyors-planners, inc., agent for New Generation Home Builders, Inc. Amend the Blues Creek Planned Development (single - family subdivision) as it relates to Unit 5 to modify development standards. Located in the 7000-7800 block of NW 58th Street.

### Recommendation

Planning staff recommends approval of Petition PB-15-115 PDA with the conditions in this report, the proposed development standards in the PD Report, and the proposed PD Layout Plan.



## Description

This petition proposes to amend the existing Blues Creek Planned Development (PD) and modify the PD Layout Plan to reflect a new Unit 5, Phase 2 subdivision of 44 single-family detached lots. The PD Report and applicant's justification materials are contained in Exhibit A-1. The Natural Areas Resource Assessment report is included as Exhibit A-3. A separate design plat to implement the proposed PD Layout Plan is currently under review and is included for informational purposes only with this petition. The design plat is included in Exhibit A-4.

The amendments to the text of the PD include the following:

- Reduction of the residential units depicted in Unit 5
- Addition of new development standards for Unit 5, Phase 2
- Amendment / update of some existing development standards
- Addition of text stating the annexation and zoning history
- Addition of a trip generation note for Unit 5, Phase 2
- Revisions to text to reflect being under the City's jurisdiction
- Setbacks for the proposed Unit 5, Phase 2 subdivision
- Allowance for a lift station as an alternative to the proposed underground sewer crossing to serve Unit 5, Phase 2.
- Addition of a standard concerning encroachment into wetland buffer areas in Unit 5, Phase 2

Amendments to the PD Layout Plan include the following:

- Illustration of 44 new lots proposed as Unit 5, Phase 2 (reduced from the 72 lots currently shown on the PD Layout plan)
- Illustration of conservation areas for Unit 5, Phase 2 (primarily for environmental set-asides)
- Illustration of a proposed 40 foot wide perpetual ingress/egress and public utilities easement to provide private drive access to Lots 37-44 to minimize impervious area and incorporated Low Impact Development (LID) design elements.
- Minor adjustment to the city limits line to correctly reflect the City of Gainesville city limits.
- Addition of the conceptual location of 3 underground utility crossings between Units 2 and 5 that cross the area labeled "drainage easement, developed recreation, & conservation area."
- Annotation of the location of Unit 7 as approved by final plat on 6/11/07 by City Resolution 060095

The Blues Creek subdivision is generally located west of NW 43rd Street, south of NW 81st Avenue, and north of NW 69th Lane. The development's western boundary is contiguous with the City of Gainesville city limits in this area. The Unit 5, Phase 2 subdivision comprises an approximately 36.7-acre portion of the entire approximately 300-acre Blues Creek development. The lots within this portion of Blues Creek wrap along the western boundary of the 90.29-acre drainage easement, recreation, and conservation area as shown on the PD Layout Plan included in Exhibit A-2.

## **Development Standards for Unit 5, Phase 2**

As stated above, this amendment to the text of the PD includes a number of revisions to the adopted Blues Creek development standards. These revisions are contained within Attachment 9 of Exhibit A-1.

### Lot sizes, setbacks, and building:

Per the proposed revisions, lots within Unit 5, Phase 2 shall be no less than 1/3 of an acre (14,375 SF) and all lot lines must be located outside of any required wetland buffers. This is consistent with the adopted PD which currently limits lot sizes for lots adjacent to the 90.29 acre to a minimum of 1/3 of an acre. Additional changes include stipulating setbacks for lots within Unit 5, Phase 2. The required front, side, and side street setbacks for Unit 5, Phase 2 are generally 2.5'-5' smaller than the remainder of the units and reflect the current lot layout and are consistent with the City's RSF-1 zoning standards.

In order to meet Gainesville Fire Rescue (GFR) requirements, all housing units within Unit 5, Phase 2 shall meet the single-family dwelling unit sprinkling standard for fire safety as required at the time of construction.

### Access:

Access to Lots 1-36 in Unit 5, Phase 2 will occur from an existing stub-out off of NW 80<sup>th</sup> Avenue. The new access road shall be in the form of publicly dedicated rights-of-way with a minimum width of 50 feet. South of lots 29 and 36, the access transitions to a perpetual 40' ingress/egress easement to be recorded to provide access to Lots 37-44. The maximum paved width along the easement is set at 14' with no sidewalks or curb and gutter. The intent of this provision is to avoid wetlands and minimize impacts to the wetland buffers within the southern portion of Unit 5, Phase 2.

### Conservation area, wetlands, and tree preservation:

Currently, the PD restricts construction within the 90-acre designated "drainage easement, developed recreation & conservation area" as depicted on the PD Layout Plan, to facilities such as nature trails, walkover structures, gazebos or other similar elevation construction which maintains the area in its natural, scenic and wooded condition; or other minor works necessary to control erosion or assure dispersion (sheetflow) of runoff entering the area. The applicant is proposing to add a note that as conceptually illustrated on the PD Layout Plan, 3 underground utility crossings for electric, water, and/or sewer are allowed between Units 2 and 5. Installation of the proposed utility connections would travel underneath Blues Creek and would be accomplished via a jack and bore technique. As an alternative to the sewer line crossing, the applicant is also requesting to amend the PD to allow a lift station to service Unit 5, Phase 2.

The Natural Areas Resource Assessment report included in this report as Exhibit A-3 indicates that there are approximately 3.82-acres of wetlands and 3.82 acres of wetland buffer located within Unit 5, Phase 2. The applicant has requested the ability to encroach within limited areas into the 35' minimum wetland buffer provided that the overall average wetland buffer

requirement of 50' is met. The wetland buffer encroachment is limited to the southern portion of Unit 5, Phase 2 south of lots 29 and 36. A more detailed analysis concerning the environmental resources present on the site and how these resources are regulated by Land Development Code 30-300 Surface Waters and Wetlands, or 30-310 Natural and Archaeological Resources can be found under the Environmental Constraints heading later in this report.

As part of the PD revisions, the applicant is placing the conservation areas depicted on the PD Layout Plan into a Conservation Management Area (CMA) which shall be managed and maintained in accordance with an approved Conservation Management Plan (CMP). The areas will be set aside and the plan will be developed, reviewed, and approved in conjunction with the approval of the final plat for the proposed Unit 5, Phase 2 subdivision.

## **Background**

The development of Blues Creek was originally approved as an Alachua County Planned Unit Development (PUD) by Zoning Resolution Z-81-68 that was adopted on July 21, 1981. The County PUD was further amended by a revised Master Plan for Blues Creek adopted and approved by Alachua County dated November 1999. Portions of the overall Blues Creek PUD were annexed by the City of Gainesville by Ordinances 001161, 001162, 001163, 002393, and 040290. These annexations occurred in 2001, 2002, and 2005.

Subsequent to the annexations, the City of Gainesville applied City future land use and zoning designations to the property. The City applied Planned Development (PD) zoning to the property via Ordinances 030472 (adopted 10/27/03) and 041187 (adopted 11/28/05). The Alachua County development regulations and conditions approved by Alachua County through Resolution Z-81-68 and the revised Master Plan for Blues Creek (dated November 1999) were adopted by the City as the regulating documents for the City PD. The various amendments to the overall Blues Creek development are contained in Attachments 3, 4, and 5 of Exhibit A-1.

The Blues Creek PD is mostly built out with the exception of 16 lots within Unit 7 and the remaining portion of Unit 5. Unit 5 is partially completed with 10 single-family detached units (this is Phase 1 of Unit 5); the 1999 Master Plan depicted 82 single-family detached units in Unit 5.

## **Key Issues**

- The applicant is requesting to amend the PD zoning to reduce the number of lots listed in the PD report for Unit 5 from 82 to 54 (10 lots have been previously developed) and revise the approved PD Layout Plan to depict a new layout for a Phase 2, of Unit 5 showing 44 lots.
- The proposed PD Layout Plan and PD report propose conceptual utility crossings of Blues Creek via jack and bore below the creek bed. These connections would provide water, sewer, and electric service to Unit 5, Phase 2 from existing utilities within Unit 2 further south. As an alternative, the applicant is requesting the ability to provide sewer service to Unit 5, Phase 2 via a lift station.
- The proposed Planned Development Amendment and proposed PD Layout Plan complies with the land use policies and requirements of the environmental regulations found in the City's Land Development Code under Sections 30-300 and 30-310.

- In order to minimize any disturbance to existing wetlands, a narrower 14' paved drive (40' ingress/egress easement) will provide access to lots within the southern portion of Unit 5, Phase 2.
- All of the buildings within Unit 5, Phase 2 will be equipped with residential sprinkler systems in accordance with Gainesville Fire Rescue requirements.

### **Basis for Recommendation**

The Planned Development meets the following criteria for Planned Development approval in Section 30-216 of the adopted land development code:

#### **1. Conformance with the PD objectives and the comprehensive plan**

The proposed Planned Development, with the conditions recommended by staff, the development standards in the PD Report, and the PD Layout Plan is in conformance with the objectives in Section 30-211(b), as follows:

- (1) *Permit outstanding and innovative residential and nonresidential developments with a building orientation generally toward streets and sidewalks; provide an integration of housing types and accommodation of changing lifestyles within neighborhoods; and provide for design which encourages internal and external convenient and comfortable travel by foot, bicycle, and transit through such strategies as narrow streets, modest setbacks, front porches, connected streets, multiple connections to nearby land uses, and mixed uses.*

As stated in the Background subsection, the Blues Creek PD was originally approved while under Alachua County jurisdiction and subsequently annexed into the City of Gainesville. The PD has been amended several times over the course of the build-out of the overall subdivision. The proposed PD amendment will integrate 44 new lots within the Unit 5 portion of the subdivision with a proposed layout which has been designed to avoid and minimize disturbances to the environmental resources within this area. As such, the PD amendment includes more modest setbacks within the portion of Unit 5, Phase 2 than in other Units of the Blues Creek PD.

- (2) *Provide flexibility to meet changing needs, technologies, economics and consumer preferences.*

The PD amendment will revise the Blues Creek Development Standards and PD Layout Plan to provide flexibility to meet the City's environmental regulations while still developing the remainder of Unit 5.

- (3) *Preserve to the greatest extent possible, and utilize in a harmonious fashion, existing and outstanding landscape features and scenic vistas.*

As stated previously and further outlined in the Environmental Constraints subsection, the proposed PD amendments conform to the City's environmental regulations contained in Land Development Code Sections 30-300 and 30-310.

- (4) *Lower development and building costs by permitting smaller networks of utilities, a network of narrower streets, and the use of more economical development patterns and shared facilities.*

This PD amendment would permit conceptual utility crossings underneath Blues Creek via a jack and bore procedure. This would provide utilities to this portion of Unit 5 from existing infrastructure within Unit 2 which is located to the south.

- (5) *Achieve overall coordinated building and facility relationships and infill development, and eliminate the negative impacts of unplanned and piecemeal development.*

The PD amendments would permit a new conceptual PD Layout Plan for Unit 5, Phase 2 in order to facilitate the build-out of Unit 5 of the Blues Creek Planned Development.

- (6) *Enhance the combination and coordination of architectural styles, building forms and building relationships within the development.*

The 44 lots within Unit 5, Phase 2 will be single-family detached units, consistent with the surrounding lots within other adjacent Units of the Planned Development. Additionally, the current PD stipulates that all of the lots surrounding the existing 90-acre drainage easement, conservation, and recreation feature must be a minimum of 1/3 of an acre. The proposed lots meet the 1/3 stipulation consistent with the PD standard.

- (7) *Promote the use of traditional, quality-of-life design features, such as pedestrian scale, parking located to the side or rear of buildings, narrow streets, connected streets, terminated vistas, front porches, recessed garages, alleys, aligned building facades that face the street, and formal landscaping along streets and sidewalks.*

As previously stated, the access to Lots 37-44 of Unit 5, Phase 2 will be in the form of an ingress/egress easement with limited paved or impervious area. This is intended to limit any disturbance of wetlands and wetland buffers within this portion of the PD. A sidewalk is will be required for the northern publicly dedicated right-of-way serving Lots 1-36. Street trees will be provided along the right-of-way and ingress/egress easement. Existing trees within the easement may be counted towards the street tree requirements with approval from the Urban Forestry Inspector.

The Planned development zoning district is consistent with the existing Single Family and Residential Low Density land use designations currently in place for the overall Blues Creek development. With the conditions proposed by staff, the development standards in the PD Report, and the PD Layout Plan, the proposed planned development amendment is also consistent with the City's Comprehensive Plan, particularly with Future Land Use Element Objective 3.1 and Policy 3.1.1 regarding protection of environmentally sensitive resources through the application of the development review process and land development code. The proposed PD amendment will reduce the number of potential lots within Unit 5, Phase 2 and will avoid any direct impacts to wetland areas while providing greater protection through the implementation of a CMA

and CMP. The PD amendment is also consistent with Policy 3.3.2 and Objective 1.4 of the Potable Water/Wastewater Element which directs the City to review the availability of existing on-site and off-site utilities and to maximize the use of existing water and wastewater facilities where already present. The PD amendment will enable the lots within Unit 5, Phase 2 to connect with existing utilities within Unit 2. Finally, the PD amendment is consistent with Policy 1.1.1 of the Conservation, Open Space, and Groundwater Recharge Element of the Comprehensive Plan which directs the City to mitigate the effects of growth and development on environmental resources through the City's environmental regulations in the Land Development Code.

## **2. Concurrency and Transportation Mobility**

The development is located within Zone B of the TMPA. At the final plat stage, development of Unit 5, Phase 2 will be required to meet the Transportation Mobility Element Policy 10.1.4 and 10.1.6 standards. Concurrency for water/wastewater and public schools facilities shall be met at the final plat stage.

## **3. Internal compatibility**

The proposed PD Layout Plan will reconfigure lots within Unit 5, Phase 2 while remaining internally consistent with the size and character of the surrounding lots in the immediate area. The lots will be a minimum of 1/3 of an acre as consistent with the PD Development Standards.

## **4. External compatibility**

The Blues Creek PD is compatible with the surrounding land uses. To the north is the Single Family designated Westchester subdivision. To the east of the PD is conservation land owned by the City of Gainesville and Single Family designated land. West of the PD and directly adjacent to Unit 5, Phase 2 is property part of the University of Florida and is included in the Campus Master Plan and shown as Agriculture. To the south of the PD is the Spring Forest residential subdivision with a Future Land Use designation of Alachua County Residential Low. The Blues Creek PD has land use designations of Single Family and Residential Low, which are compatible with the surrounding uses.

## **5. Intensity of development**

The Blues Creek PD has been mostly built-out over the past 35 years. The proposed PD Amendment will facilitate the eventual development of the remainder of Unit 5, Phase 2 consistent with the PD Layout Plan. The amendment will reduce the number of undeveloped conceptual lots within Unit 5 down from 72 to 44 thereby reducing the intensity of the development.

## **6. Usable open spaces, plazas and recreation areas**

Open space and recreational areas which include the 90-acre drainage easement, conservation, and passive recreation area will remain in place as established with the original PD approval and PD Layout Plan.

## 7. Environmental constraints

The City's Environmental Coordinator reviewed the proposed Planned Development Amendment and provided the following review comments:

The subject petition for a proposed amendment to the existing Planned Development (PD) zoning for the Blues Creek Planned Development has been reviewed for considerations relating to any environmental resources present on or immediately adjacent which might be regulated by City Land Development Code 30-300 Surface Waters and Wetlands, or 30-310 Natural and Archaeological Resources. The petition proposes text changes relating to development standards, infrastructure provisions, and modification of the lot and roadway configuration for the remaining undeveloped Unit 5, Phase 2 area of the project.

The subject property is located in northwest Gainesville, west of Northwest 43rd Street, in the Blues Creek drainage basin. The majority of the Blues Creek Planned Development as approved through the Alachua County and City of Gainesville land development review processes dating back to 1981 has been completed (or has received final development approval – Unit 7), except the westernmost 36.7 acres within the designated Unit 5, Phase 2 area. The approved PD and master plan for the development includes a dedicated 90 acre conservation and stormwater management area associated with the meandering channel of Blues Creek, which traverses the southern part of the property in its westward course toward Blues Sink in the San Felasco Hammock State Preserve.

The petition includes a comprehensive natural resources assessment for a 126.99 acre Planning Parcel area (reference City Code Section 30-310(f) Review of Planning Parcel), comprised of two contiguous tax parcels (36.7 acre Parcel 06006-052-000 and 90.29 acre Parcel 06006-002-000) within the overall Blues Creek Planned Development site. This environmental study and report, titled Natural Areas Resource Assessment Blues Creek Unit 5, Phase 2 Planned Development Amendments, dated October 5, 2015, and revised December 31, 2015, was provided by the petitioner's environmental consultant, Ecosystem Research Corporation (ERC). This assessment was performed and prepared in accordance with a Methodology Agreement between the petitioner and City staff, dated June 13, 2013, pursuant to City Code 30-310(g), which required a Level 1 survey, review, and description of the Natural and Archaeological Resources present on or immediately adjacent to the planning parcel area of the subject property. Regulated resources found and described on the property include strategic ecosystem, significant natural community (including a significant sink depression, based on staff determination), and listed species. Staff concurs with the assessment determinations and mapping delineations of regulated natural and archaeological resource areas surveyed pursuant to City Code 30-310.1. These regulated resource areas were field verified in the current review process.

A discussion of the composition of upland acreage subject to Strategic Ecosystem regulation within the Unit 5, Phase 2 area, as well as within the conservation/stormwater management area, is provided in Section 4.7 of the ERC report. The regulated natural and archaeological resource areas delineation maps (with acreages) define the location



and extent of upland acreage which would comprise the set-aside for the project in compliance with City Code 30-310.2, with percentages of proposed upland set-aside acreage (including wetland buffers) ranging from 35% in Unit 5, Phase 2 to 62% in the resource assessment area (Planning Parcel) overall.

The applicant's petition includes a Planned Development (PD) Report Amendment, Blues Creek Unit 5, Phase 2, dated October 6, 2015, revised December 1, 2015 and December 21, 2015, which commits, at the final plat stage, to the establishment of a Conservation Management Area (CMA) pursuant to Section 30-310.3 which will cover the entire 90.29 acre Parcel 06006-002-00090 area and all the conservation areas within the Unit 5, Phase 2 area. The CMA and associated required conservation easement(s) and management plan, will be protected and managed in perpetuity in a natural condition, with conditions and exceptions which are typical for conservation easements under state law, but provide for the unique conditions of the resource areas, allowable passive recreational uses, and vested property and permit rights and maintenance responsibilities, such as the drainage easement operation and use of the 90 acres for stormwater management, and any infrastructure allowed by the PD amendment ordinance. The CMA must be completely approved and established prior to approval of a final plat for the project.

The ERC assessment also includes extensive information describing the surface waters and wetlands of the 36.7 acre Unit 5, Phase 2 area of the site, and the adjacent 90 acre conservation/stormwater management area. Boundaries of regulated surface waters and wetlands within and adjacent to the Unit 5, Phase 2 area were previously verified by the Suwannee River Water Management District and the Alachua County Environmental Protection Department, and have been reconfirmed in accordance with City Code 30-302.1(c) in the current review process. Development of the project site will be required to comply with the avoidance provisions of City Land Development Code 30-300 Surface Waters and Wetlands. The PD layout plan and conceptual Design Plat submitted with this PD amendment application has been modified through consultations with staff to avoid wetland areas within both the Unit 5, Phase 2 area, as well as within the adjacent 90-acre conservation/stormwater management area, to the greatest extent practicable, to achieve the petitioner's stated minimum development objectives. Avoidance of wetlands has been essentially fully achieved. Upland buffers around regulated wetlands and watercourses are required, and although encroachment into buffers in some locations by roadways and utilities is unavoidable, these encroachments have been minimized through design alternatives reducing standard roadway and utility section widths. With wider buffering around wetland boundaries away from roadways, the overall buffer width average of 50 feet minimum is met. Additional minimization may be possible during the plat review process, and the applicant has agreed to implement measures for further reducing impacts based on acceptable field adjustments. Upland buffers around wetlands will be credited as a component of the required set-aside of natural and archaeological resource areas, and much of these protected buffers will include the exceptional mesic hammock forest which is part of the significant natural community of the site.

Protection and management of the strategic ecosystem, significant natural communities, and listed species habitat areas set-aside, will be implemented through dedication of a

Conservation Management Area (CMA) per code section 30-310.3, as mentioned above. Although significant upland natural communities (mesic hammock and xeric hammock) which lie within the Millhopper Flatwoods Strategic Ecosystem map overlay would be impacted through the proposed development, measures for avoidance and minimization were taken to reduce loss of the natural communities through layout and design. Mitigation for this unavoidable loss is provided through the set-aside/CMA provision, which will protect 11.47 acres of significant upland natural communities and wetland buffers within the 32.87 acre Unit 5, Phase 2 area, along with 23.51 acres of significant upland communities within the 90-acre conservation/stormwater management area. Essentially all the significant natural wetland communities (consisting of 33.03 acres of Blues Creek, mixed hardwood wetlands, and hydric hammock) within the resource assessment area will be included in the Conservation Management Area and will enhance the functional mitigation value of the associated significant upland community resource areas.

As such, staff concludes that the proposed Planned Development Amendment and conceptual design plat/layout complies with the land use policies and requirements of the environmental regulations of City of Gainesville Land Development Code Sections under 30-300 and 30-310 (Level 1 Review). Prior to approval of final subdivision development plans and final plat, the establishment of the Conservation Management Area, management plan, and legal protection documents for the set-aside/mitigation areas described above must be fully completed and recorded.

#### **8. External transportation access**

The entrance roadway into the Blues Creek development (NW 73<sup>rd</sup> Avenue) is located on the west side of NW 43<sup>rd</sup> Street. A pedestrian and vehicular connection exists to the north connecting the Blues Creek and Westchester subdivisions and an additional pedestrian connection occurs in the south connecting into the Deer Run subdivision.

#### **9. Internal transportation access**

Internal access within the PD is provided by an existing roadway and partial sidewalk network connecting the various Units within the overall development.

#### **10. Provision for the range of transportation choices**

The internal street and sidewalk network within the overall development provide the ability to bike, walk, or drive. Additionally, Public Works has identified that a TMPA contribution to construct a sidewalk connection along NW 73<sup>rd</sup> Avenue to connect with the existing sidewalk along NW 43<sup>rd</sup> Street as a potential method to meet the TMPA Zone B criteria at the final plat stage.

### **Additional Considerations**

#### **1. Unified control**

As provided with the application materials: Unit 5, Phase 2 and the portion of associated tax parcel 06006-002-000 that is within the project limits for this PD amendment are

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under the control of New Generation Home Builders and Blues Creek Development. Both New Generation Home Builders and Blues Creek Development have provided authorization for the PD amendment application request.

**2. Phasing**

As indicated, a separate design plat is proposed to subdivide the remaining portion of Unit 5, Phase 2.

**3. Development time limits**

The Blues Creek PD as approved by Alachua County and subsequently amended by the City does not contain development time limits. As previously stated, the development of the overall Blues Creek subdivision has occurred over the past 35 years and is mostly built-out with the exception of a portion of Unit 7 and Unit 5, Phase 2.

**Recommended PD Conditions:**

**Condition 1:** Each housing unit within Unit 5, Phase 2 shall provide a residential sprinkler system in compliance with the current edition of the National Fire Protection Association *NFPA 13D: Standard for the installation of sprinkler systems in one- and two-family dwellings and manufactured homes* requirements for one-family dwellings.

Respectfully submitted,

Ralph Hilliard  
Planning Manager

Prepared by:

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Interim Principal Planner

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**Table 1**

**Adjacent Existing Uses**

<b>North</b>	Westchester Subdivision
<b>South</b>	Spring Forest Subdivision
<b>East</b>	Vacant conservation property
<b>West</b>	University of Florida agricultural property

**Adjacent Zoning and Land Use**

	<b>Land Use Category</b>	<b>Zoning Category</b>
<b>North</b>	Single Family	RSF-1
<b>South</b>	Alachua County: Residential Low Density	Alachua County: PD, R1-A
<b>East</b>	Single Family, Conservation	RSF-1, Conservation
<b>West</b>	UF Master Plan	Agriculture

## List of Appendices

### Appendix A PD Amendment

- Exhibit A-1 Proposed PD Report, Application, and Neighborhood Workshop information
- Exhibit A-2 Proposed PD Layout Plan
- Exhibit A-3 Natural Areas Resource Assessment Blues Creek Unit 5, Phase 2
- Exhibit A-4 Design Plat (Informational Only)

### Appendix B Supplemental Documents

- Exhibit B-1 Aerial Photograph
- Exhibit B-2 Existing Land Use Map
- Exhibit B-3 Existing Zoning Map
- Exhibit B-4 TRC Comment Response Letter
- Exhibit B-5 Letter from the Suwannee River Water Management District concerning Blues Creek Unit 5, Phase 2

### Appendix C Citizen Letters

- Exhibit C-1 Citizen letters concerning Blues Creek PD Amendment