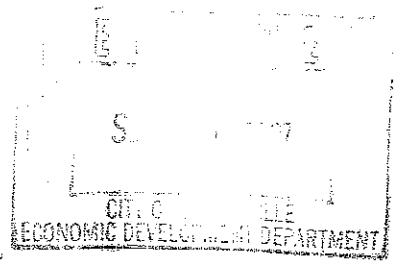
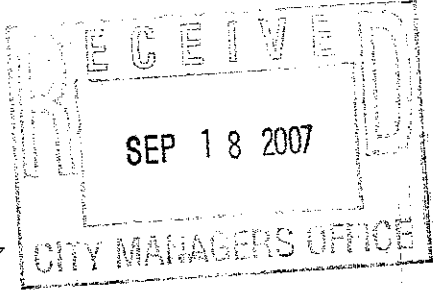


070447 F

# Alachua County Board of County Commissioners

Paula M. Delaney, *Chair*  
Rodney J. Long, *Vice Chair*  
Mike Byerty  
Cynthia Moore Chestnut  
Lee Pinkoson

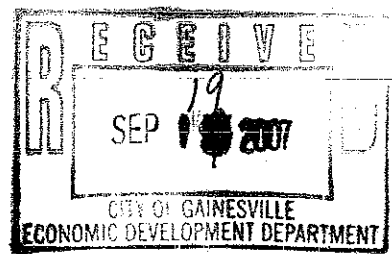
Administration  
Randall H. Reid  
*County Manager*



September 11, 2007

Mayor Pegeen Hanrahan  
City Gainesville  
P.O. Box 490, Station 19  
Gainesville, FL 32602-0490

**RE: Proposed Plum Creek Timberlands, LP Comp Plan Amendment**



Dear Mayor Hanrahan:

The Alachua County Board of County Commissioners has serious concerns about the proposed Comprehensive Plan Amendment and recommends denial of the current application. This proposed Land Use change is simply too intense for this environmentally sensitive and flood prone area.

Alachua County previously commented on environmental, flood, and traffic issues related to this development proposal as part of the Alachua County Annexation Team response to the Urban Services Report (USR) for the proposed annexation. The annexation team sent a response to Mr. Blackburn, City Manager, in January 2007, which included an Alachua County Environmental Protection Department (ACEPD) memorandum documenting specific environmental concerns with potential development in this area. ACEPD also sent a letter in August, 2007 to the Chair of the City Plan Board recommending denial of the Comprehensive Plan Amendment.

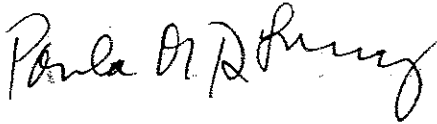
As noted in the Attachment, there are many environmentally sensitive issues associated with this land and it is our position that this property cannot handle any large-scale developments without hindering the environmental integrity and health of the area. The Attachment also contains comments from Alachua County Growth Management outlining traffic analysis and road construction cost concerns.

070447F

We greatly value the intergovernmental partnership between the City of Gainesville and Alachua County in protecting our local resources. Please do not hesitate to contact me or my staff if you have any questions or require additional information.

Sincerely,

07/08/98



Paula M. DeLaney,  
Chair  
Chr.07.081  
PMD/kaf

Attachment 1: Recommendations and Concerns

Xc: Board of County Commissioners  
Randall H. Reid, County Manager  
Rick Drummond, Growth Management Director  
Gainesville Mayor Hanrahan  
Gainesville City Commissioners  
Erik Bredfeldt, Interim Gainesville Community Development Director  
Teresa Scott, Gainesville Public Works Director  
Ralph Hilliard, Gainesville Planning and Zoning  
David Coffey, P.A. Agent for Plum Creek Timberlands, LP  
Chris Bird, Environmental Protection Director  
Rick Hedrick, Public Works Director

070447F

Attachment 1

ACEPD recommends the completion of a special area study prior to any land use change and/or development approval due to the presence of Strategic Ecosystems, Murphree Wellfield Protection Zone, and extent of wetlands. We recommend the City provide for a comprehensive environmental review by a third party independent of the property owner/developer since ACEPD is no longer under contract to provide such review. Careful planning, identification of clear environmental perimeters, strict guidelines, and effective coordination among agencies is needed to optimize the protection of natural resources while providing for sustainable economic development in this area

The project area is completely located within the two designated strategic ecosystems. These ecosystems contain major headwaters areas supporting Rocky Creek, Monteocha Creek, Rhuda Branch, Hatchet Creek, Little Hatchet Creek, Turkey Creek, and Hogtown Creek.

ACEPD estimated that approximately 60% - 80% of the surface area consists of wetlands and/or is within the 100-year floodplain. Hatchet Creek and little Hatchet Creek are the two largest tributaries to Newnans Lake, which is currently identified as an impaired waterbody. In addition to identifying Newnans Lake as impaired, the Florida Department of Environmental Protection has set a total maximum daily load (TMDL) for nutrients. Runoff with increased nutrients entering Newnans Lake from the Hatchet Creek and Little Hatchet Creek watersheds could further adversely impact Newnans Lake. Rocky Creek and Monteocha Creek are both tributaries to the Santa Fe River, another waterbody that has segments listed for nutrient impairment. The upland areas are mostly pine flatwoods with poorly to very poorly drained soils. The property is adjacent to the Murphree Wellfield Conservation Easement, is within the Tertiary Murphree Wellfield Protection Zone, and is a source of ground water recharge. The area contains many rare and endangered species, including black bears, wading birds, gopher tortoises, indigo snakes, rattlesnakes and several rare plants. The isolated wetlands are important amphibian breeding sites and provide feeding habitat for wading birds. As part of biological reconnaissance work conducted on Hatchet Creek in the vicinity of CR225, this stream segment was found to have the greatest in-stream biological diversity of the more than 20 sites evaluated throughout Alachua County.

Any large development in this area will likely have extensive impacts to this system. Even with the applicant's proposed reduction of units, the density is still 7.5 times more dense than the currently allowed Alachua County rural/agriculture land use would allow. Because of the extensive scattering of wetlands over the entire area, any internal road network will likely directly impact and isolate many of these wetlands. Imperious areas created by a large development would exacerbate the flooding that currently and naturally exists in this area due to the poorly draining soils that characterize even the upland habitats of the project area. The loss and bisection of any headwater areas will also have a detrimental effect on the creeks in this area, which could also lead to further degradation of Newnan's Lake.

Should the City of Gainesville support development in this area, it should be designed to leave the ecological integrity of the system intact. Connectivity of habitat, minimization of fragmentation of natural areas, protection of the wetlands, floodplains, and associated upland habitat should drive the design of any development in the area. We recommend that the Strategic Ecosystem policies in Article 5 of Chapter 406 Alachua County Unified Land Development Code (ULDC), or equivalent standards, be upheld. These standards should include; resource-based planning and design, clustering development, limiting density, minimizing impacts and protecting upland habitat, wetlands,

070447 F

and wetland buffers. Proposed developments should be designed with swales and native vegetation/xeriscaping and avoid roads designed with curb and gutter. Require low percentage of impervious areas through clustering, narrow road widths, and recommend Low-Impact Development (LID) practices like site fingerprinting (only clear areas for structure, access, and defensible space only, leave the rest undisturbed), rain gardens, swales, cisterns to collect rain water and other practices and designs that will reduce flooding issues. Any proposed development should provide details demonstrating proper buffering to the Murphree Wellfield Conservation Easement which was put in place to protect water quality in this area.

Pine flatwoods are not conducive to stormwater systems. Pine flatwoods contain a perched water table, often within 1.5 feet of the surface, contain scattered wetlands and floodplains and poorly drained soils. The project area is within the Suwannee River Water Management District which will require the stormwater system to meet the 100 year/critical storm event design criteria. Based on the current site conditions, any stormwater system for a development of this size could have major negative impacts to the environmental integrity of the area.

Creeks, wetlands and their buffers should be kept intact, including the exclusion of stormwater ponds within the wetland buffers. Maintaining large intact natural buffers is crucial to protecting the quality of the creeks. Because of the extensive wetlands, any internal road network is likely to impact wetlands and wetland buffers. When roads are proposed to cross wetlands and go through wetland buffers, bridges should be required to minimize impacts. No non-residential septic systems or standard residential septic systems should be allowed within this watershed. Limit potential point sources (i.e. large stormwater ponds and hazardous materials sites), require strong restrictions on fertilizer, pesticide, and herbicide use, and limit well construction and septic tanks. Provide standards and protections equivalent or greater than what is in Chapter 353 (Hazardous Materials Code), Alachua County ULDC.

Require thorough evaluation of the property and survey for listed species. Identify habitat needs for maintaining species diversity and sustainability. Require conservation easements and management plans (include exotic control and prescribed fire) for areas to be preserved. Prescribed fire is an important component to maintaining and enhancing wildlife habitat and reducing the risk of wild fire. Require connectivity between habitats, minimize fragmentation, protect habitat and needs of listed species. Provide wildlife crossing and corridor on CR 231/ SR 121 to maintain connectivity of the Buck Bay and Hague Flatwoods Strategic Ecosystems.

Additionally, there will be substantial traffic impacts if the proposed development is constructed. Given the tremendous amount of traffic at the intersection of 441 and State Road 121, significant improvements will be needed to accommodate project traffic. If developed, the proposed project will add additional traffic to NW 53 Street at US 441 and additional improvements may be needed to ensure that the Level of Service (LOS) standards are met. State Road 121 is the arterial serving the proposed Plum Creek development. Based on the lowest traffic estimates that were provided by the applicant, the State Road 121 road segment can only handle about a quarter of the total trips for the development and meet concurrency.