

## Exhibit 30

### State Review Agency Comments & Staff Responses

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The State Land Planning Agency processed this amendment through the Expedited Review Process and issued a letter dated October 2, 2014 stating the Agency *"identified no comment related to important state resources and facilities within the Department's authorized scope of review that will be adversely impacted by the amendment if adopted."* Several departments provided comments or recommendations; however, the DEO did not carry forward these comments into their review letter.

**Treasure Coast Regional Planning Council (TCRPC)** - In a memorandum dated September 19, 2014, the TCRPC staff stated that "Council should approve this report and authorize its transmittal to Palm Beach County and the Florida Department of Economic Opportunity". However, they also provide the following recommendations:

1. Council recommends that Palm Beach County commit to a program that will adequately mitigate project impacts on the regional roadway network prior to approval of the proposed amendment. There is an opportunity for the county to address these and other issues in the conditions of approval considered during the zoning process.
2. Council recommends that Palm Beach County adequately address the concerns of the Town of Loxahatchee Groves and Village of Royal Palm Beach and any other extrajurisdictional comprehensive plan impacts prior to approval of the proposed amendment.
3. The amount and arrangement of public open space can be improved by: 1) compressing proposed development areas; 2) replacing some of the artificial neighborhood edge conditions via the use of authentic avenues, boulevards, and formal linear parks rather than wide "greenways" or flowways;" 3) reducing or eliminating the footprint of the low density Planned Unit Developments (PUDs) that surround the main project; and 4) increasing net density within the proposed neighborhoods. The different arrangement of public open space being suggested here is important to consider if this general area is to maintain some semblance of rural character. It could also address some of the concerns expressed by surrounding jurisdictions.
4. Further improvement to the master plan could be accomplished by: 1) adding and defining smaller civic use and open space/park sites within each of the neighborhoods; and 2) increasing the amount of neighborhood fabric/units within walking distance of designated work place and shopping districts.

**Staff Response:** The County has included detailed phasing and roadway improvement program related to this project in the Zoning conditions of approval as recommended by TCRPC. In this the project complies with and exceeds the required proportionate share payments.

Regarding the comments concerning the Loxahatchee Groves and Royal Palm Beach resolutions, the impacts will already occur with the existing residential development approvals within the Acreage, Loxahatchee Groves, and the 2,996 units already approved for the Minto West site. However, the Minto West project would offer the best chance to provide both mitigation and funding for improvements to help offset the impacts associated with the existing approved residential development. In adding the proposed non-residential uses, balancing of the land uses helps to reduce on-peak flows, provides trip capture or trip reduction, thereby eliminating some of the through trips that affect those municipalities.

At a conceptual level Staff recognizes the merit in additional compaction or clustering of the development area in the Minto West Agricultural Enclave. However, throughout the negotiations on this project, Staff has attempted to balance the requirement for appropriate new urbanism concepts with the existing character of the surrounding area. Additional separation could be created, but would appear to be further densification and concentration. Many of the design strategies employed were chosen to balance these competing factors and limit the apparent density within the Enclave--this included incorporation of Rural Parkways within the non-urban transects to ensure that those entering the project by whatever means would experience a gradual transition, merging the rural character of the surrounding area and bringing it more toward center of the Enclave.. Also, although the "PUD" uses the residential pod development program from this zoning district, it also must meet the transect requirements within the Plan, provide streets which connect and do not terminate in cul-de-sacs, and have central/useable open space within 1/4 mile radius of any residence, thereby ensuring an appropriate level of new urbanism in a lower density setting. It is noted that the PUD is limited in land area by condition of approval in the land use amendment, and there is no requirement that mandates the provision of PUD residential pods within the TTD, it is simply an allowance.

Staff notes that the urban design recommendations proffered by the Council are largely already met by the zoning regulations for the Traditional Town Development zoning district. These include the provisions and size of neighborhood parks, recreation and useable open space. Furthermore, the clustering requirements of the Transects were intended to provide as many units as possible around the employment and town centers. The separation between the center and edge at the extremities of the development area is no more distant than that seen within Wellington or Royal Palm Beach.

**Florida Department of Transportation (FDOT)** - In a letter dated October 1, 2014, the Department stated that they understand "the amendment's objective to better balance the jobs to housing" but they are "concerned however, about adverse impacts to SIS and regional roadways that are essential for intra-state and regional mobility." The department also provided the following recommendations:

1. A long-term, system-oriented solution for access and mobility needs for the Central Western Communities should be analyzed that includes a more interconnected local roadway network capable of serving existing and proposed future land uses.
2. FDOT should have the opportunity to participate in establishing proportionate share timing, allocation amounts, project selection, and conveyance mechanisms in response to adverse impacts to important state resources, facilities, and key intersections.
3. The County is expected to participate in a FDOT SR-80 action plan that is scheduled to begin in the fall of 2015. The plan will analyze alternatives and set forth interim and long term improvements to preserve the traffic level of service within the SR-80 corridor through a minimum 20 year planning horizon. It will produce a variety of recommendations to provide for the efficient inter-regional movement of both people and goods to bring the SR-80 corridor into compliance with the Department's SIS Standards.

**Staff Response:** As far back as the late 1980s, an arterial system was identified with extensive community input in conjunction with the County and the Metropolitan Planning Organization to address emergent roadway congestion as the Central Western Communities continued to develop. However, this has taken far longer to materialize than was originally envisioned. This was followed later, when Palm Beach County pursued a Central Western Communities Sector Plan for nearly 10 years, which in part, attempted to address land use imbalances and infrastructure needs within the region, prior to large

existing agricultural parcels seeking development approvals. Subsequent to the Sector Plan efforts, the BCC has not authorized any "system-oriented solution for access and mobility needs" in this area. However, this proposal is based on the Proposed Remedial Amendment to the Sector Plan, as it was the last BCC direction on a long-term coordinated approach addressing the many needs of the area.

The proposed conditions of approval in the concurrent zoning petition address the FDOT concerns about the timing, amount, and mechanisms to respond to roadway impacts.

The County intends to participate in the SR-80 corridor study.

**Florida Department of Agriculture and Consumer Affairs (FDACS)** - In a letter dated September 25, 2014, the department stated that they have "no comment on the proposal."

**Staff Response:** Noted.

**Florida Fish and Wildlife Conservation Commission (FWC)** - In a letter dated, October 1, 2014, the department stated that "the majority of the site is in active agriculture with no remaining native habitat." "Minto West is located within the CFAs [core foraging area] of three wood stork nesting colonies and within the consultation area for the Everglade snail kite, red-cockaded woodpecker, Audubon's crested caracara, and the Florida scrub jay" and therefore "FWC recommends coordination with our staff to identify important resource areas to be considered during the planning and permitting process". As such, "FWC staff recommends that Policy 2.2.5-e [pertaining to the Natural Transect] include a statement to coordinate with FWC during the planning process for development of Minto West."

**Staff Response:** Coordination with the FWC will take place during the permitting process.

**South Florida Water Management District (SFWMD)** - In a letter dated, September 30, 2014, the District provided the following technical assistance:

1. At the time of permitting, coordinate with the Water Use Regulation to identify the water resources planned to meet the projected potable water demands for the proposed land use designation and the water demand projections for irrigation and non-potable water needs.
2. Continue to coordinate with Environmental Resource Permitting to provide information detailing the planned flood control and water quality measures including design features intended to potentially provide additional water storage or drainage capacity for surrounding properties.
3. Continue to coordinate planning and development efforts with the District in designing the system to support local flood improvement goals which allow stored water to be available to assist in meeting the restoration flows to the Loxahatchee River.
4. District staff is available to provide technical assistance on incorporation of reclaimed water and/or water conservation into development planning.

**Staff Response:** Many of the permitting requirements and coordination efforts are further detailed in the Zoning development order proposed conditions, as this is the appropriate place to locate such provisions, and is consistent with the larger Policy requirement and incorporated within the site specific amendment condition E.

**Florida Department of Environmental Protection (DEP)** - In an email dated, October 2, 2014, the department stated "the Department has found no provision that, if adopted, would result in adverse impacts to important state resources subject to the Department's jurisdiction".

**Staff Response:** Noted.

**Florida Department of Education (DOE)** - In a letter dated, October 10, 2014, the DOE provided the following technical assistance, "The amendment would be improved if revised to include a condition to memorialize the applicant's agreement to donate a site and to specify that the site must meet state requirements for educational facilities and the educational specifications adopted by the School Board of Palm Beach County. One option to address this comment is to include such a requirement in the list of Conditions for Approval on page E-2 of Exhibit 1."

**Staff Response:** The School Board of Palm Beach County has opted to place conditions of approval on the concurrent Zoning petition that address the timing, location, and other requirements needed to meet their requirements for future educational facilities within the project area.

**Florida Department of State (DOS)** - In a letter dated, October 1, 2014, the DOS provided the following technical assistance, "A review of the Florida Master Site File show that one archaeological site (8PB11369--Callery-Judge Grove Site) that has not yet been evaluated for eligibility for listing in the *National Register of Historic Places* resides within the boundary of the proposed amendment area. Any future plans for this area should be sensitive to potential adverse impacts to this resource."

**Staff Response:** Prior to making an application for a Future Land Use Atlas amendment, the County requires a review of cultural resources, and initial consultation with the County Historic Preservation Officer/Archaeologist. In a letter dated October 28, 2013, the County Archaeologist indicated that 8PB11369 was "mechanically trenched" to a depth of at least three feet sometime prior to October 2006, and the site was destroyed. As a result, Staff believes that site 8PB11369 would not be eligible for inclusion in the *National Register of Historic Places*.

Additionally, in the October 28, 2013 letter, the County Archaeologist indicated that new research since October 2006, has "identified 15 other paleo-landforms which might contain undocumented prehistoric resources on the Minto Property." As such, Article 9.A.1.B.5 of the Unified Land Development Code (ULDC) would apply and the Minto West project would need to comply with the Certificate to Dig application and procedural requirements outlined in Article 9.A.3.C and 9.A.3.D of the ULDC prior to the issuance of a development order.