

**SANTAFE VILLAGE
DEVELOPMENT OF REGIONAL IMPACT
SUBSTANTIAL DEVIATION EVALUATION REPORT**

Prepared for the

Alachua County Board of County Commissioners

by the

North Central Florida Regional Planning Council

2009 N.W. 67th Place

Gainesville, FL 32653-1603

(352) 955-2200

August 26, 2010

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EXECUTIVE SUMMARY

The Florida Environmental Land and Water Act of 1972 charges regional planning agencies with the responsibility of reviewing proposed developments which, because of their "character, magnitude, or location" might have a substantial effect on the health, safety or welfare of citizens of more than one county.

In accordance with this mandate, the following report presents the evaluation, conclusions and recommendations of the North Central Florida Regional Planning Council concerning changes to the SantaFe Village Development of Regional Impact located near the Interstate Highway 75/State Road 222 (NW 39th Avenue) interchange within Alachua County, Florida.

As described in the Substantial Deviation Application for Development Approval, the project is a Substantial Deviation to an existing Development of Regional Impact. The original Development of Regional Impact was reviewed by the Council on October 24, 1986. A subsequent Substantial Deviation to the original development was reviewed by the Council on June 24, 1993. The Substantial Deviation increases retail commercial floor area, general office floor area, hotel rooms, and residential dwelling units and reduces medical office floor area, hospital floor area and beds, life care housing units, life care assisted living units, and life care long term care units.

This report is based largely on information supplied by the Applicant as presented in the Substantial Deviation Application for Development Approval (February 10, 2009) and additional material supplied by the Applicant as a result of sufficiency review. Supplemental information was obtained through on-site inspection and through contact with officials of state and local agencies. In accordance with state law, the comments and recommendations from other agencies have been considered in this evaluation and are included in Appendix A.

This report is intended to provide potentially affected local governments with an assessment of regional impacts that are likely to result should the development be allowed as proposed in the Substantial Deviation Application for Development Approval and recommend, where appropriate, modifications and/or stipulations to the proposal which might preclude the potential or alleviate the effect of any adverse regional impacts identified.

This report, including the proposed recommended conditions, was adopted as the regional planning agency recommendation to the Alachua County Board of County Commissioners by the North Central Florida Regional Planning Council at its regularly scheduled meeting held August 26, 2010.

The Substantial Deviation, upon completion, will consist of 1,473 multi-family dwelling units, 38,250 square feet of medical office, 443,720 square feet of general office, 209,000 square feet of hospital with 238 beds, 209,700 square feet of retail and service, 10,000 square feet restaurant floor area, and 250 hotel rooms. Finally, the Substantial Deviation consists of two 5-year phases with project completion scheduled for the year 2019.

CONCLUSIONS

- 1) The project will have a positive impact on employment opportunities and the tax base of the region.
- 2) With the exception of the regional transportation network, the project will not create an undue strain on the public facilities of the region.
- 3) The project will produce significant adverse impacts on the regional transportation network. These impacts are addressed by Applicant commitments beginning on page eight? of this report to mitigate its significant regional and local transportation impacts through the use of proportionate share pursuant to Subsection 163.3180(12), Florida Statutes.
- 4) Phase I of the project will not create significant adverse affordable housing impacts. The affordable housing impacts of Phase II of the project cannot be determined at this time.
- 5) The project will not cause significant adverse impacts to regional water quality or listed species.
- 6) The project will not produce significant adverse impacts to wetlands, soils, floodplains, or historical and archaeological resources of the region

RECOMMENDATIONS

It is recommended that the SantaFe Village Development of Regional Impact Substantial Deviation be approved with the following condition specified in the Development Order:

1) Conditions: Affordable Housing

Prior to the initiation of Phase II, the Applicant shall re-assess the affordable housing impact of the project as per the affordable housing analysis agreement for the SantaFe Village Development of Regional Impact Substantial Deviation on March 1, 2009 entitled, "Agreement Between The North Central Florida Regional Planning Council, the Board of County Commissioners of Alachua County, Florida, and Santa Fe Healthcare, Inc. Regarding the Affordable Housing Analysis for an Application for Development Approval for the Santa Fe Healthpark Development of Regional Impact Substantial Deviation."

It is also recommended that the Applicant commitments identified in this evaluation report be included in the Development Order

I

APPLICATION INFORMATION

Applicant: SantaFe HealthCare, Inc.
4300 NW 89th Boulevard
Gainesville, FL 32606

Authorized Agent: C. David Coffey, Esquire
C. David Coffey, P.A.
5346 NW 91st Terrace
Gainesville, FL 32608

Name of Project: SantaFe Village Development of Regional Impact
Substantial Deviation

**Date, Time and Place
of Public Hearing:** September 14, 2010, 5:00 p.m.
John R. (Jack) Durrance Auditorium, 2nd Floor, Rm 209
Alachua County Administration Building
Gainesville, FL

As described in the Substantial Deviation Application for Development Approval, the project is a Substantial Deviation to the existing Development of Regional Impact reviewed by the Council on June 24, 1993. The existing Development of Regional Impact provides for the construction of 150,000 square feet of medical office floor area, 275,000 square feet of general office floor area, 335,000 square feet for a 400-bed hospital, 40,000 square feet of retail commercial and service, 180 life care housing units, 120 assisted living facility units, and 180 life care long term care units situated on 148.70 acres. The project was approved for a 25-year construction period, with project completion targeted for the year 2018.

The Substantial Deviation will allow an additional 169,700 square feet of retail commercial floor area as well as an additional 10,000 square feet of restaurant floor area. The Substantial Deviation adds 1,473 multi-family residential dwelling units as well as 250 hotel units. Additionally, the Substantial Deviation will result in a decrease of 111,750 square feet of medical office floor area, a decrease of 146,000 square feet of hospital floor area as well as a decrease of 162 hospital beds. The Substantial Deviation also eliminates 180 life care housing units, 120 life care assisted living units, and 180 life care long-term care units. The Substantial Deviation increases the project site by 30.54 acres. The currently approved project, changes proposed by the Substantial Deviation, and net change, are described in Table 1, below.

TABLE 1

**INTENSITY OF USE COMPARISON BETWEEN
THE EXISTING APPROVED SANTAFE VILLAGE DEVELOPMENT OF REGIONAL IMPACT
AND THE PROPOSED SUBSTANTIAL DEVIATION**

| LAND USE | APPROVED DEVELOPMENT OF REGIONAL IMPACT | UNIT OF MEASURE | PROPOSED SUBSTANTIAL DEVIATION | NET CHANGE |
|---|--|----------------------------|---|-----------------------|
| Medical Office | 150,000 | Sq. Ft. | 38,250 | (111,750) |
| General Office | 275,000 | Sq. Ft. | 443,720 | 168,720 |
| Hospital (Institutional) | 355,000 | Sq. Ft. | 209,000 | (146,000) |
| | 400 | Beds | 238 | (162) |
| Retail & Service | 40,000 | Sq. Ft. | 209,700 | 169,700 |
| Restaurant | 0 | Sq. Ft. | 10,000 | 10,000 |
| Residential (Life Care - Housing) | 180 | Housing Unit | 0 | (180) |
| Residential (Life Care - Assisted Living) | 120 | Assisted Living Unit | 0 | (120) |
| Residential (Life Care - Long Term) | 180 | Long Term Care Unit | 0 | (180) |
| Residential (Apartment) | 0 | Dwelling Unit | 1,473 | 1,473 |
| Hotel | 0 | Room | 250 | 250 |
| Open Space & Right-of-Way | 50.20 | Acres | 80.12 | 29.92 |

Source: SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page 10-B-1.

The Substantial Deviation, upon completion, will consist of 1,473 multi-family dwelling units, 38,250 square feet of medical office, 443,720 square feet of general office, 209,000 square feet of hospital with 238 beds, 209,700 square feet of retail and service, 10,000 square feet restaurant floor area, and 250 hotel rooms. Finally, the Substantial Deviation consists of two 5-year phases with project completion scheduled for the year 2019. The Substantial Deviation development, by phase, is described in Table 2, below.

TABLE 2

**SANTAFE VILLAGE DEVELOPMENT OF REGIONAL IMPACT SUBSTANTIAL DEVIATION
INTENSITY OF USE BY PHASE**

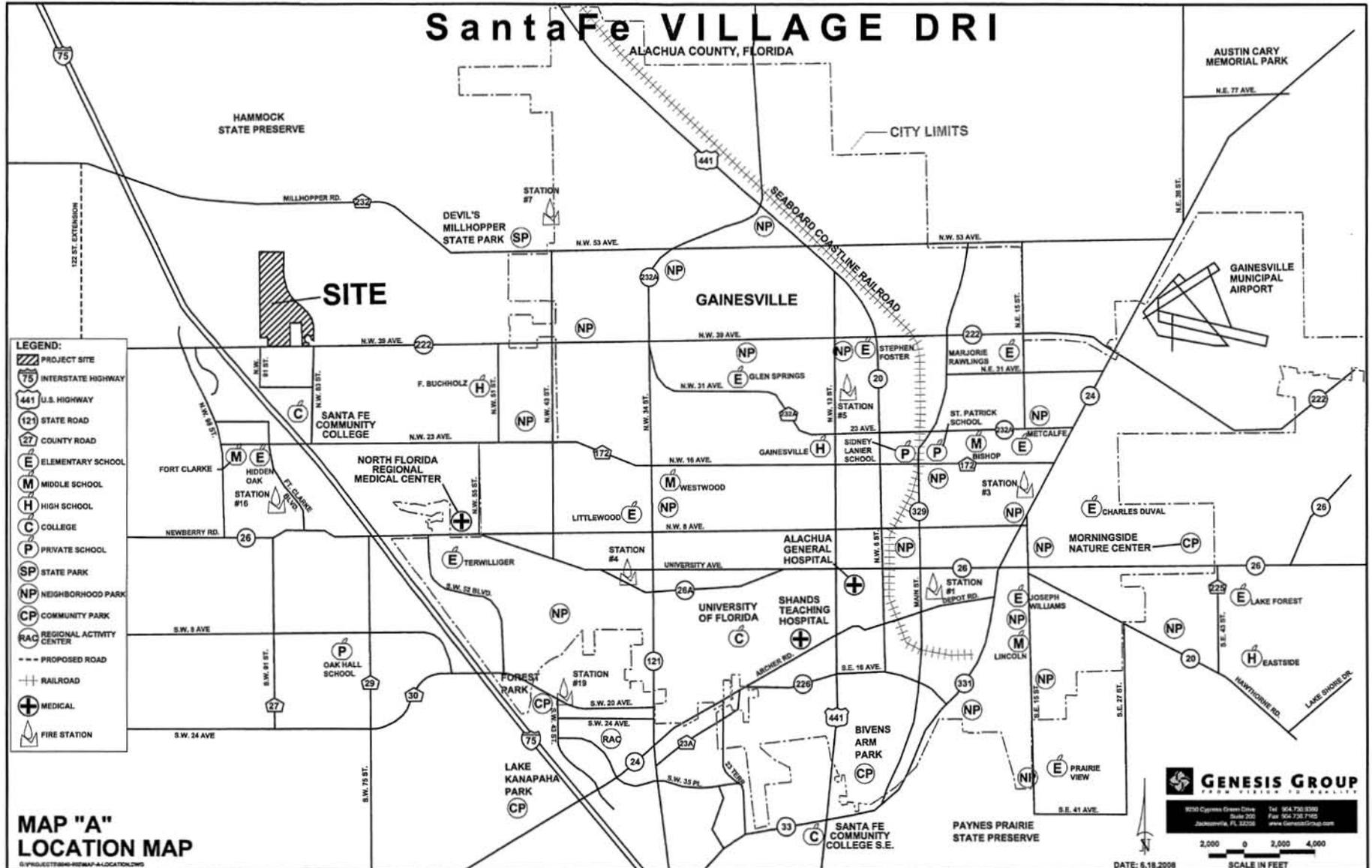
| LAND USE | UNIT OF MEASURE | INTENSITY | | | |
|---------------------------|-----------------|-----------|---------|----------|---------|
| | | EXISTING | PHASE I | PHASE II | TOTAL |
| Medical Office | Sq. Ft. | 0 | 12,750 | 25,500 | 38,250 |
| General Office | Sq. Ft. | 123,000 | 111,900 | 208,820 | 443,720 |
| Hospital (Institutional) | Sq. Ft. | 118,000 | 0 | 91,000 | 209,000 |
| | Beds | 139 | 0 | 99 | 238 |
| Retail & Service | Sq. Ft. | 0 | 70,700 | 139,000 | 209,700 |
| Restaurant | Sq. Ft. | 0 | 10,000 | 0 | 10,000 |
| Residential (Apartment) | Dwelling Unit | 0 | 494 | 979 | 1,473 |
| Hotel | Room | 0 | 250 | 0 | 250 |
| Open Space & Right-of-Way | Acres | - | - | - | 50.20 |

Source: SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page 10-B-1.

The Substantial Deviation provides for the development of the project site as an urban mixed-use community. It includes a new village center with transit-oriented design. An area identified as Mixed Use in Illustration II will contain a mix of retail, office and residential uses organized to be pedestrian friendly, walkable, and served by public transportation to Santa Fe College and the Oaks Mall transit hub. Residential development will be placed over retail commercial space, hotels will be placed over retail, and some stand-alone retail is proposed within the mixed use area. Additionally, an area on the project site identified as Institutional/Medical Office in Illustration II will contain a hospital as well as medical office buildings.

As previously noted, the Substantial Deviation expands the project site by 30.54 acres, resulting in a project site consisting of 179.24 acres. Mixed Use development will comprise 74.54 acres of the project site while 24.58 acres will be developed as Medical Office/Institutional. An additional 23.39 acres will be developed as Right-of-Way while 23.39 acres will be treated as Open Space. A location map and master development plan map are shown in Illustrations I and II, respectively.

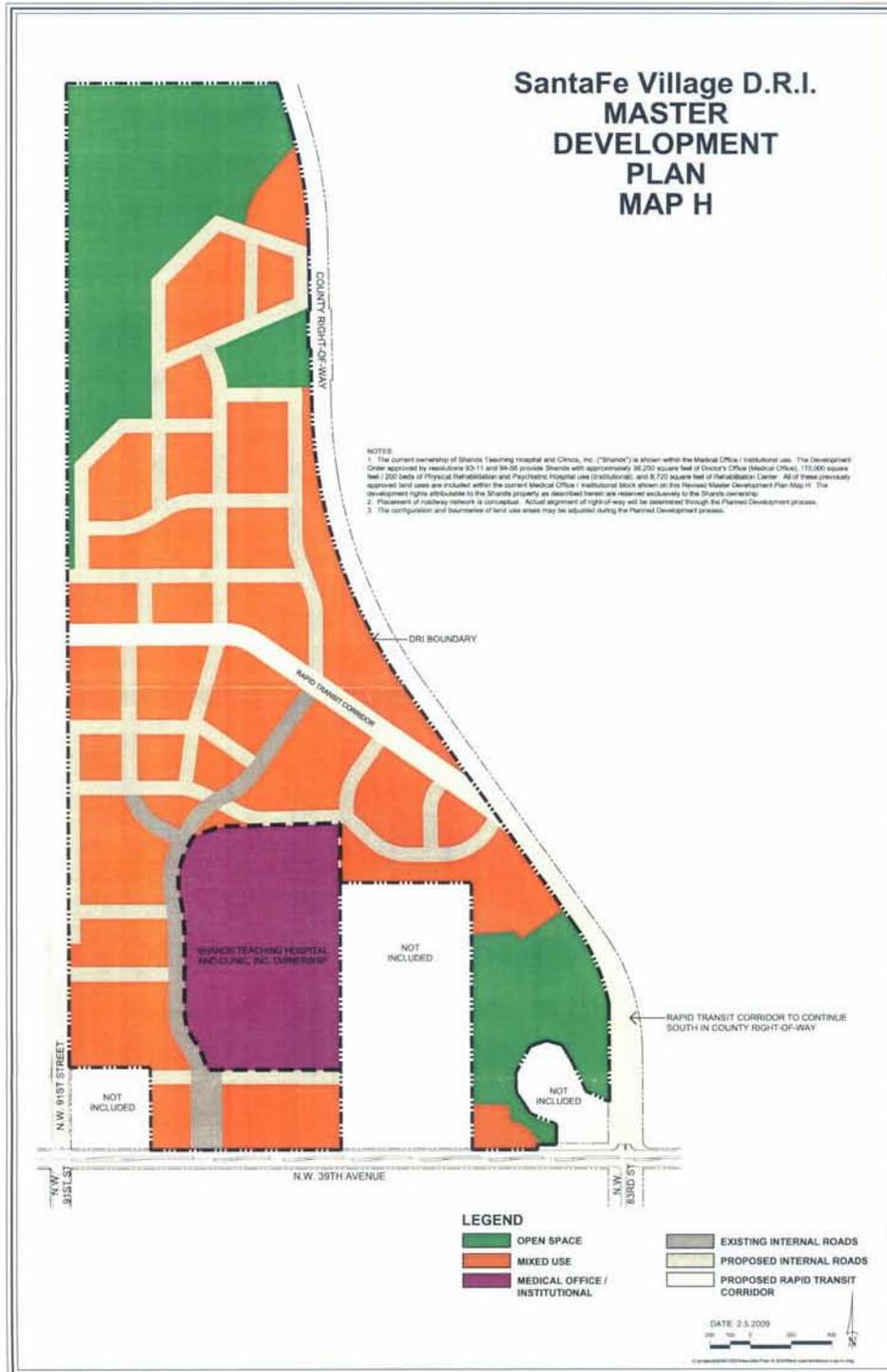
ILLUSTRATION I GENERAL LOCATION MAP



4

DRAFT

ILLUSTRATION II MASTER DEVELOPMENT PLAN



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II

APPLICANT COMMITMENTS

The currently-approved local government development order for the existing Development of Regional Impact identifies a number of Applicant commitments. Rule 9J-2.025(3), Florida Administrative Code, requires the Applicant to submit biannual reports to identify the status of the project with regards to compliance with the conditions contained in the local government development order as well as any commitments made by the Applicant in the Substantial Deviation Application for Development Approval which have been identified by the County, the regional planning council, and the Florida Department of Community Affairs as being significant. Council review of the Substantial Deviation Application for Development Approval identifies the following Applicant Commitments.

- (1) Wastewater service will be provided to all building improvements within the project boundary via connection to centralized wastewater treatment system facilities owned and operated by Gainesville Regional Utilities (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q18-1).
- (2) The stormwater management system will be designed and constructed as described in the Application for Development Approval (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, pages Q19-1 through Q19-4).
- (3) Best management practices for erosion and sediment control measures shall be utilized as specified by the St. Johns River Water Management District (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q19-3).
- (4) Master stormwater management facilities serving the project shall be operated and maintained by a homeowners or property owners association, or a combination thereof (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q19-4).
- (5) Potable water service will be provided to all building improvements within the project boundary via connection to centralized water distribution facilities owned and operated by Gainesville Regional Utilities (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q17-1).
- (6) Water conservation, low impact development techniques to prevent pollution and runoff, and best management practices for water quality which minimize the use of pesticides and fertilizers as described in a memorandum dated June 16, 2008 from Genesis Group to the St. Johns River Water Management District will be utilized on the project site (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, Question 17, pages 1-17).

- (7) A hazardous materials management plan will be prepared by the proposed hospital and associated laboratories prior to operation (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q12-2).
- (8) Approximately three acres of passive recreation areas will be provided on the project site in the form of a village green and a central passive-recreation area consisting of a combination of open space fields, wooded trails, gazebos and rain gardens (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q26-1).
- (9) The project site will contain approximately 53 acres of open space. In addition to the 53 acres, general open space surrounding existing and proposed buildings will be provided within the “Mixed Use” area shown on Map H (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q26-1).
- (10) Onsite security patrol will be provided by the future SantaFe Village homeowners or property owners association, or a combination thereof (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q25-1).
- (11) To create dedicated transit lanes by the Applicant from the site, south along NW 83rd Street to NW 23rd Avenue;
- (12) To create a transit corridor through the site from NW 83rd Street west to the adjacent PRIET property;
- (13) To fund its part of bus rapid transit service with 15-minute peak and 25-minute day long headways for 20 years through a Community Development District or other appropriate funding mechanism; and
- (14) To dedicate right-of- way to extend NW 83rd Street into the development as a primary access point and, where applicable, driveways to the existing roadway network will be provided to ensure that the overall roadway network will operate efficiently and remain consistent with the area’s Comprehensive Plans and design requirements. These efforts will be coordinated with the City of Gainesville, Alachua County, and Florida Department of Transportation.

- (15) During site preparation and construction, contractors will be required to adhere to air quality standards that include, but are not limited to, the use of the following fugitive dust control measures:
- (a) Contractors shall moisten soil or use resinous adhesives on barren areas, which areas shall include, at a minimum, all roads, parking lots and material stockpiles.
 - (b) Contractors shall use mulch liquid resinous adhesives with hydroseeding or sod on all landscape areas.
 - (c) Contractors shall promptly remove soil and other dust-generating materials deposited on paved streets by vehicular traffic, earth-moving equipment or soil erosion.
 - (d) Contractors shall utilize the best operating practices in conjunction with any burning resulting from land clearing, which may include the use of air curtain incinerators (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q22 -1).
- (16) In the event that gopher tortoise burrows are found within 25 feet of areas impacted by development, a gopher tortoise relocation permit will be obtained from the Florida Fish and Wildlife Conservation Commission prior to their relocation (SantaFe Village Development of Regional Impact Substantial Deviation Responses to March 9, 2008 Sufficiency Review, June 5, 2009, page 6).
- (17) The Applicant proposes to transplant specimens of the Southern lady fern to a seepage wetland located along the northeast portion of the project site which is proposed for preservation (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q12-9).
- (18) All wetlands located on the project site will be preserved in their entirety, including buffers ranging from an average of 50 feet for wetlands less than or equal to 0.5 acres in size to an average of 75 feet for wetlands greater than 0.5 acres in size (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q13-29).
- (19) The project site will not contain facilities that use or store large quantities of hazardous materials that can be spilled and result in stormwater and ultimately groundwater contamination (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, Q14 page 8).
- (20) Vegetative buffers or native and planted vegetation will be provided and/or retained along building site boundaries (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q15-2).

- (21) Standard erosion control devices will be utilized during construction within all graded areas. A Soil Erosion and Sediment Control Plan will be prepared consistent with local, state and federal regulations (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q15-2).
- (22) Exposed and disturbed areas will be re-vegetated and landscaped with native vegetation following construction activities (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q15-2).
- (23) No structures, roadways or utilities will be constructed in the post-development 100-year flood prone area (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q16-1).
- (24) The Applicant will follow procedures outlined in Appendix 30-B (see “Unanticipated Discoveries of Archaeological and Historic Sites, Including Human Remains”) of the Application for Development Approval if new historical or archaeological discoveries are made during project construction (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q30-2).

III

RECOMMENDATIONS

SUMMARY OF POSITIVE AND NEGATIVE IMPACTS

Population - The direct impacts of the Substantial Deviation will be responsible for a regionwide population increase of 2,931 at buildout, all of which will reside on the project site. The direct impacts of the project will increase the school-age population within Alachua County by 314 students.

The Economy - The direct impacts of the Substantial Deviation is expected to create approximately 2,244 permanent full-time and part-time jobs on the project site at project completion which will produce roughly \$90.3 million per year in salaries, with an average salary of \$40,232.

Wastewater - Although the project site is located within an Area of High Aquifer Recharge Potential to the Floridan Aquifer, a Natural Resource of Regional Significance as identified in the North Central Florida Strategic Regional Policy Plan, significant adverse impacts to ground or surfacewaters caused by wastewater generated by the project are not expected to occur as the Applicant will utilize the centralized wastewater system to serve the development.

Stormwater Management - Significant adverse regional impacts to ground or surfacewaters are not expected to occur provided the Applicant complies with the Surfacewater Management Rules of the St. Johns River Water Management District. Adverse local impacts could occur if the owners association responsible for maintaining the master drainage management facilities is inadequately established and/or funded.

Education - The direct impacts of the project are anticipated to generate 124 elementary school students, 101 middle school students, and 89 high school students which are anticipated to reside on the project site.

Recreation and Open Space - Adverse impacts on the recreation and open space resources of the region are not anticipated as a result of this project.

Health Care - Significant impacts to regional health care facilities are not anticipated as a result of the project.

Police and Fire Protection - It is anticipated that assistance will be required from the City of Gainesville Fire Rescue Department for large fires occurring on the project site.

Transportation - The project will significantly adversely impact the regional road network serving the northwest section of the Gainesville Urbanized Area. These impacts are addressed by Applicant Commitments beginning on page 36 of this report to mitigate its significant regional and local transportation impacts through the use of proportionate share pursuant to Subsection 163.3180(12), Florida Statutes.

Housing - The first phase of the project will not create a significant affordable housing impact.

Vegetation and Wildlife - Adverse impacts to listed species and their habitats are not anticipated.

Water - Significant adverse impacts to the quality and quantity of the Floridan Aquifer are not anticipated as a result of the Substantial Deviation.

**RECOMMENDED CONDITIONS AND
OTHER DEVELOPMENT ORDER RECOMMENDATIONS**

CONDITIONS

The North Central Florida Regional Planning Council recommends that the SantaFe Village Development of Regional Impact Substantial Deviation be approved as proposed in the Substantial Deviation Application for Development Approval [which, is comprised of SantaFe Village Development of Regional Impact First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009; SantaFe Village Development of Regional Impact First Sufficiency Review Response and Application for Development Approval Update, Separate Volume for Question 21, February 10, 2009; “RE: SantaFe Village Development of Regional Impact Responses to March 9, 2009 Sufficiency Review,” prepared by Dawn Sonneborn, AICP, Associate Vice President, Genesis Group; “RE: Responses to the July 7, 2009 Sufficiency Review of Second Sufficiency Review Response and Application for Development Approval Update for Substantial Deviation to the Previously Approved SantaFe Development of Regional Impact,” prepared by Dawn Sonneborn, AICP, Associate Vice President, Genesis Group; and “RE: Responses to the January 27, 1010 Notice of Determination of Sufficiency - Third Sufficiency Review Response for the Application for Development Approval for a Substantial Deviation to the Previously Approved SantaFe Village Development of Regional Impact,” dated May 26, 1010, prepared by Dawn Sonneborn, AICP, Associate Vice President, Genesis Group] and including all the measures enumerated therein designed to mitigate or have the effect of mitigating potential adverse impacts, provided however, that the following condition be specified in the Development Order:

1) Conditions: Affordable Housing

Prior to the initiation of Phase II, the Applicant shall re-assess the affordable housing impact of the project as per the affordable housing analysis agreement for the SantaFe Village Development of Regional Impact Substantial Deviation on March 1, 2009 entitled, “Agreement Between The North Central Florida Regional Planning Council, the Board of County Commissioners of Alachua County, Florida, and Santa Fe Healthcare, Inc. Regarding the Affordable Housing Analysis for an Application for Development Approval for the Santa Fe Healthpark Development of Regional Impact Substantial Deviation.”

OTHER DEVELOPMENT ORDER RECOMMENDATIONS

The findings and conclusions reached by the Council regarding regional impacts is based on the information provided in the Application for Development Approval, which includes commitments made by the Applicant as identified in the Applicant Commitments section of this evaluation report. However, the Applicant-proposed local government development order does not include a listing of Applicant commitments. A listing of Applicant commitment in the local government development order is necessary to ensure the project is constructed in accordance with the project description contained in the Application for Development Approval. The listing is also necessary to ensure that the biennial report required in subsections 380.06(15)(d) and 380.06(16), Florida Statutes, addresses progress towards implementation and compliance with the Applicant commitments. Therefore, it is recommended that the Applicant commitments identified in this evaluation report be included in the local government development order.

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IV

EVALUATION OF REGIONAL IMPACTS

In accordance with the legislation and rules governing the review process, this section of the report discusses five major impact subject areas: Impacts on the economy of the region, impact on the public facilities of the region, impacts on the transportation facilities of the region, impacts on housing of the region, and impacts on the environment and natural resources of the region. Each subject area begins with a summary statement of impacts and is followed by a discussion of impact determination.

IMPACT ON THE ECONOMY OF THE REGION

This section evaluates the impacts of the project on the economy of the region. In this evaluation, consideration is limited to the direct effects on the economy.

APPLICABLE REGIONAL GOALS/POLICIES

Regional Goal 2.1. Attract new high-paying, value-added industries and expand existing businesses in the region.

Regional Goal 2.2. Raise the median family income of north central Florida households.

Regional Goal 2.5. Reduce the regional unemployment rate.

APPLICANT COMMITMENTS

None.

SUMMARY OF IMPACTS

The Substantial Deviation will result in 2,931 persons living on the project site. The residential portion of the project site is anticipated to be home to 314 elementary and secondary education students.

Upon completion, the project will have a favorable impact on employment opportunities of the region with larger favorable impacts on Alachua County. The Applicant expects 2,244 permanent full-time and part-time employees on the project site at completion.¹ Project site employees will earn approximately \$90.3 million per year in salaries, with an average annual salary of \$40,232.² It should be noted that the average wage for project site employees is higher than the average Alachua County average annual wage of \$37,173.³

Construction of the \$321.6 million project (excluding land costs) authorized by the Substantial Deviation will have a favorable impact on monetary flows and construction employment within the region. The Applicant estimates that approximately \$225.1 million of the project construction costs will be spent within the Alachua County while an additional \$22.5 million will be spent within the region outside of the County. The Applicant anticipates an average of 317 construction employees per year during Phase I and 437 construction employees during Phase II. The Applicant estimates that 35 percent of the project construction costs will consist of labor.

IMPACT DETERMINATION

The Council has reviewed the direct impacts of the project as determined by the Applicant. The direct impacts identified in this report are those determined by the Applicant for which the Council was able to review, verify, and concur. All impacts included in this report are those as identified by the Applicant unless otherwise noted.

JOBS

The direct jobs generated by the Substantial Deviation are distributed by jurisdiction based on the distribution of commuter origins of project site employees contained in the Application. Based on the Application's distribution, approximately 82.5 percent the permanent (non-construction) employees will reside in Alachua County while approximately 17.25 percent of employees commuting from locations outside Alachua County but within the region as presented in Table 3.

¹ SantaFe Development of Regional Impact Substantial Deviation, First Sufficiency Review and Application for Development Approval Update, February 10, 2009, page Q10-1-1.

² As reported in SantaFe Development of Regional Impact Substantial Deviation, First Sufficiency Review and Application for Development Approval Update, February 10, 2009, Table 10-3-10, Page Q-10-3-9). Average wage determined by dividing total reported annual wages in Table 10-3-10 by 2,244 employees.

³ The average annual Alachua County Salary as per, "Florida 2007 Annual Employment and Wages, County 4-digit North American Industry Classification System wages, Alachua County, All Ownerships, Agency for Workforce Innovation, Labor Market Statistics, Employment Survey-202 Program, in cooperation with the U.S. Department of Labor, Bureau of Labor Statistics.

TABLE 3

**PERMANENT EMPLOYMENT AT BUILDOUT
LOCATION OF RESIDENCE**

| PHASE | ALACHUA COUNTY | REMAINDER OF REGION | OUTSIDE OF REGION | TOTAL |
|------------------|---------------------------|--------------------------------|------------------------------|--------------|
| Phase I, Direct | 569 | 121 | 0 | 690 |
| Phase II, Direct | 1,282 | 272 | 0 | 1,554 |
| Total, Direct | 1,851 | 393 | 0 | 2,244 |

Source: North Central Florida Regional Planning Council, July 2010.

Derived From, SantaFe Development of Regional Impact Substantial Deviation, First Sufficiency Review and Application for Development Approval Update, February 10, 2009, Table 10-3-11.

POPULATION

The estimated current jurisdiction of residence of the population attributable to the direct impacts of the Substantial Deviation are allocated in Table 4 based on the Applicant's distribution of County of residence used in Table 3.

TABLE 4

**PERMANENT RESIDENTS AT BUILDOUT
LOCATION OF ORIGIN**

| PHASE | ALACHUA COUNTY | REMAINDER OF REGION | OUTSIDE OF REGION | TOTAL |
|------------------|---------------------------|--------------------------------|------------------------------|--------------|
| Phase I, Direct | 811 | 172 | 0 | 983 |
| Phase II, Direct | 1,607 | 341 | 0 | 1,948 |
| Total, Direct | 2,418 | 513 | 0 | 2,931 |

Source: North Central Florida Regional Planning Council, July 2010.

Derived From, SantaFe Development of Regional Impact Substantial Deviation, First Sufficiency Review and Application for Development Approval Update, February 10, 2009, Table 10-3-11.

IMPACT ON THE PUBLIC FACILITIES OF THE REGION

WASTEWATER

APPLICABLE REGIONAL GOALS/POLICIES

Regional Goal 2.6. Ensure adequate public utilities and facilities to serve business and industrial development throughout the region.

Regional Goal 4.3. Protect all sources of recharge to the Floridan Aquifer from all activities which would impair these functions or cause a degradation in the quality of the water being recharged in recognition of the importance of maintaining adequate supplies of high-quality groundwater for the region.

Regional Policy 4.3.6. Ensure that local comprehensive plans, Development of Regional Impacts, and requests for federal and state funds for development activities reviewed by the Council include adequate provisions for stormwater management and aquifer recharge protection in order to protect the quality and quantity of water contained in the Floridan Aquifer.

APPLICANT COMMITMENTS

- (1) Wastewater service will be provided to all building improvements within the project boundary via connection to centralized wastewater treatment system facilities owned and operated by Gainesville Regional Utilities (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q18-1).

SUMMARY OF IMPACTS

The Substantial Deviation is anticipated to generate approximately 523,000 gallons of wastewater per day when fully developed.

IMPACT DETERMINATION

The Applicant estimates wastewater generation rates for various uses proposed for the project by phase. The rates are based on standard generation rates provided in Chapter 64E, Florida Administrative Code. The generation estimates prepared by the Applicant have been reviewed by Gainesville Regional Utilities staff who compared projected wastewater generation by phase to projected available capacity. Gainesville Regional Utilities staff concluded that sufficient capacity will exist to provide wastewater treatment for the project through the Gainesville Regional Utilities centralized wastewater treatment system.

Based on current demand projections, existing facilities, budgeted capital improvements and anticipated facilities beyond the six year capital budget horizon, excess capacity, Gainesville Regional Utilities estimates surplus wastewater treatment capacity of 2.5 million gallons per day in 2010 and 0.71 million gallons per day in 2015.⁴ Table 5 provides wastewater generation rates and total generation by phase for the project, as provided by the Applicant.

Gainesville Regional Utilities notes that construction of wastewater collection facilities will be required to meet the demands of the project and that current Gainesville Regional Utilities extension policies require the developer to pay the majority of these costs.⁵

⁴ Letter dated December 12, 2007 from Jennifer McElroy, E.I., Gainesville Regional Utilities Strategic Planning, to Robert Walpole, P.E., Casseaux, Hewett & Walpole, Inc. See SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page 17-F-1

⁵ Letter dated December 12, 2007 from Jennifer McElroy, E.I., Gainesville Regional Utilities Strategic Planning, to Robert Walpole, P.E., Casseaux, Hewett & Walpole, Inc. See SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page 17-F-1

TABLE 5

**SANTAFE VILLAGE PROJECTED AVERAGE WASTEWATER GENERATION
DIRECT IMPACTS, BY PHASE, DISCRETE**

| PHASE/LAND USE | AVG DAILY RATE PER UNIT (gallons) | UNIT OF MEASURE | NO. OF UNITS | DEMAND (Gallons per Day) |
|-------------------------|--|------------------------|---------------------|---------------------------------|
| Existing | | | | |
| General Office | 0.15 | Sq. Ft. | 123,000.0 | 18,450.0 |
| Institutional | 0.24 | Sq. Ft. | 118,000.0 | 28,320.0 |
| Hospital | 225.00 | Bed | 139.0 | 31,275.0 |
| Existing, Total | | | | 78,045.0 |
| Phase I | | | | |
| Medical Office | 0.24 | Sq. Ft. | 12,750.0 | 3,060.0 |
| General Office | 0.15 | Sq. Ft. | 111,900.0 | 16,785.0 |
| Retail | 0.10 | Sq. Ft. | 70,700.0 | 7,070.0 |
| Restaurant | 1.50 | Sq. Ft. | 10,000.0 | 15,000.0 |
| Residential - Apartment | 175.00 | Dwelling Unit | 494.0 | 86,450.0 |
| Hotel | 200.00 | Room | 250.0 | 50,000.0 |
| Phase I Total | | | | 178,365.0 |
| Phase II | | | | |
| Medical Office | 0.24 | Sq. Ft. | 25,500.0 | 6,120.0 |
| General Office | 0.15 | Sq. Ft. | 208,820.0 | 31,323.0 |
| Institutional | 0.24 | Sq. Ft. | 91,000.0 | 21,840.0 |
| Retail | 0.10 | Sq. Ft. | 139,000.0 | 13,900.0 |
| Hospital | 225.00 | Bed | 99.0 | 22,275.0 |
| Residential - Apartment | 175.00 | Dwelling Unit | 979.0 | 171,325.0 |
| Phase II Total | | | | 266,783.0 |
| Total, All Phases | | | | 523,193.0 |

Source: North Central Florida Regional Planning Council, July 2009. Derived from SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page 18-A-2.

IMPACT ON THE PUBLIC FACILITIES OF THE REGION

STORMWATER MANAGEMENT

APPLICABLE REGIONAL GOALS/POLICIES

Regional Goal 4.3. Protect all sources of recharge to the Floridan Aquifer from all activities which would impair these functions or cause a degradation in the quality of the water being recharged in recognition of the importance of maintaining adequate supplies of high-quality groundwater for the region.

Regional Policy 4.3.6. Ensure that local comprehensive plans, Development of Regional Impacts, and requests for federal and state funds for development activities reviewed by the Council include adequate provisions for stormwater management and aquifer recharge protection in order to protect the quality and quantity of water contained in the Floridan Aquifer.

Regional Policy 4.6.13. Ensure that local government comprehensive plans, Development of Regional Impacts, and requests for federal and state funds for development activities reviewed by the Council include adequate provisions for stormwater management, including retrofit programs for known surfacewater runoff problem areas, and aquifer recharge protection in order to protect the quality and quantity of water contained in the Floridan Aquifer and surfacewater systems identified as natural resources of regional significance.

APPLICANT COMMITMENTS

- (2) The stormwater management system will be designed and constructed as described in the Application for Development Approval (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, pages Q19-1 through Q19-4).
- (3) Best management practices for erosion and sediment control measures shall be utilized as specified by the St. Johns River Water Management District (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q19-3).
- (4) Master stormwater management facilities serving the project shall be operated and maintained by a homeowners or property owners association, or a combination thereof (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q19-4).

SUMMARY OF IMPACTS

Although the project site is located within an Area of High Aquifer Recharge Potential, a Natural Resource of Regional Significance as identified in the North Central Florida Strategic Regional Policy Plan, significant adverse impacts to surfacewaters are not expected to occur, provided the Applicant complies with the commitments expressed above and elsewhere in the Substantial Deviation Application for Development Approval.

Significant adverse regional impacts to surfacewaters are not expected to occur provided the Applicant complies with the surfacewater management rules of the St. Johns River Water Management District and the condition on water quality monitoring presented in the Water section of this report. Adverse local impacts could occur if the owners/homeowners association responsible for maintaining the master drainage management facilities is inadequately established and/or inadequately funded.

IMPACT DETERMINATION

Approximately 35.8 percent (64.30 acres) of the project site will contain impervious surfaces, primarily from paved roadways and parking areas, and buildings.⁶ The Substantial Deviation Application for Development Approval also notes that the existing depressional areas of the site are part of the existing drainage system and will continue to function as such. The Substantial Deviation Application for Development Approval further states that some of the site will discharge stormwater off-site, but that post-development runoff will not exceed pre-development runoff characteristics.

The Substantial Deviation Application for Development Approval states that the project's drainage system will be constructed in conformance with the design standards of Alachua County and the St. Johns River Water Management District. Stormwater facilities will be operated and maintained by a future property owner or homeowner association or a combination thereof. Master drainage management facilities receiving stormwater discharge from development will be operated and maintained by an owners association. The Substantial Deviation Application for Development Approval does not address how the owners association will be funded in order to assure proper maintenance of the master drainage facilities.

⁶ SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q19-3.

IMPACT ON THE PUBLIC FACILITIES OF THE REGION

WATER SUPPLY

APPLICABLE REGIONAL GOALS/POLICIES

Regional Goal 2.6. Ensure adequate public utilities and facilities to serve business and industrial development throughout the region.

Regional Goal 4.2. Maintain an adequate supply of high-quality groundwater to meet the needs of north central Florida residents, in recognition of its importance to the continued growth and development of the region.

APPLICANT COMMITMENTS

- (5) Potable water service will be provided to all building improvements within the project boundary via connection to centralized water distribution facilities owned and operated by Gainesville Regional Utilities (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q17-1).
- (6) Water conservation, low impact development techniques to prevent pollution and runoff, and best management practices for water quality which minimize the use of pesticides and fertilizers as described in a memorandum dated June 16, 2008 from Genesis Group to the St. Johns River Water Management District will be utilized on the project site (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, Question 17, pages 1-17).

SUMMARY OF IMPACTS

The project is estimated to consume approximately 573,000 gallons of potable water per day at buildout. Significant adverse impacts to the regional water supply are not anticipated to occur as a result of the project.

IMPACT DETERMINATION

The Applicant estimates potable water consumption rates for various uses proposed for the project by phase. The rates are based on standard generation rates provided in Chapter 64, Florida Administrative Code, with the exception of apartment units, for which the Gainesville Regional Utilities generation rates are applied. The consumption estimates prepared by the Applicant have been reviewed by Gainesville Regional Utilities staff who compared projected potable water consumption by phase for the project to projected available capacity. Gainesville Regional Utilities staff concluded that based on demand projections, existing facilities, budgeted capital improvements, and anticipated facilities beyond the six year capital budget horizon used by Gainesville Regional Utilities, sufficient capacity will exist to provide potable water to the project through the Gainesville Regional Utilities centralized potable water system. Gainesville Regional Utilities notes that construction of water distribution facilities will be required to meet the demands of the project and that current Gainesville Regional Utilities extension policies require the developer to pay the majority of these costs.⁷

⁷Letter dated December 12, 2007 from Jennifer McElroy, E.I., Gainesville Regional Utilities Strategic Planning, to Robert Walpole, P.E., Casseaux, Hewett & Walpole, Inc. See SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page 17-F-1.

Based on current demand projections, existing facilities, budgeted capital improvements and anticipated facilities beyond the six year capital budget horizon, excess capacity, Gainesville Regional Utilities estimates surplus water treatment capacity of 8.0 million gallons per day in 2010, and 5.9 million gallons per day in 2015.⁸ Table 6 provides potable water consumption rates and total generation by phase for the project.

TABLE 6

**SANTAFE VILLAGE PROJECTED AVERAGE DAILY POTABLE WATER
GENERATION
DIRECT IMPACTS, BY PHASE, DISCRETE**

| PHASE/LAND USE | AVG DAILY FLOW PER UNIT (Gallons) | UNIT OF MEASURE | NO. OF UNITS | DEMAND (Gallons per Day) |
|----------------------------|--|------------------------|---------------------|---------------------------------|
| Existing | | | | |
| General Office | 0.16 | Sq. Ft. | 123,000.0 | 19,680.0 |
| Institutional | 0.26 | Sq. Ft. | 118,000.0 | 30,680.0 |
| Hospital | 248.00 | Bed | 139.0 | 34,472.0 |
| Existing, Total | | | | 84,832.0 |
| Phase I | | | | |
| Medical Office | 0.26 | Sq. Ft. | 12,750.0 | 3,315.0 |
| General Office | 0.16 | Sq. Ft. | 111,900.0 | 17,904.0 |
| Retail | 0.11 | Sq. Ft. | 70,700.0 | 7,777.0 |
| Restaurant | 1.65 | Sq. Ft. | 10,000.0 | 16,500.0 |
| Residential - Apartment | 192.50 | Dwelling Unit | 494.0 | 95,095.0 |
| Hotel | 220.00 | Room | 250.0 | 55,000.0 |
| Phase I Total | | | | 195,591.0 |
| Phase II | | | | |
| Medical Office | 0.26 | Sq. Ft. | 25,500.0 | 6,630.0 |
| General Office | 0.16 | Sq. Ft. | 208,820.0 | 33,411.2 |
| Institutional | 0.26 | Sq. Ft. | 91,000.0 | 23,660.0 |
| Retail | 0.11 | Sq. Ft. | 139,000.0 | 15,290.0 |
| Hospital | 248.00 | Bed | 99.0 | 24,552.0 |
| Residential - Apartment | 193.00 | Dwelling Unit | 979.0 | 188,947.0 |
| Phase II Total | | | | 292,490.2 |
| Total, All Phases | | | | 572,913.2 |

Source: North Central Florida Regional Planning Council, July 2009. Derived from SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page 17-A-2.

⁸ Letter dated December 12, 2007 from Jennifer McElroy, E.I., Gainesville Regional Utilities Strategic Planning, to Robert Walpole, P.E., Casseaux, Hewett & Walpole, Inc. See SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page 17-F-1

IMPACT ON THE PUBLIC FACILITIES OF THE REGION

SOLID WASTE

APPLICABLE REGIONAL GOALS/POLICIES

Regional Goal 2.6. Ensure adequate public utilities and facilities to serve business and industrial development throughout the region.

Regional Goal 4.3. Protect all sources of recharge to the Floridan Aquifer from all activities which would impair these functions or cause a degradation in the quality of the water being recharged in recognition of the importance of maintaining adequate supplies of high-quality groundwater for the region.

APPLICANT COMMITMENTS

- (7) A hazardous materials management plan will be prepared by the proposed hospital and associated laboratories prior to operation (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q12-2).

SUMMARY OF IMPACTS

Potential adverse impacts to the Floridan Aquifer, a major regional and statewide resource, as a result of solid waste impacts are not anticipated as a result of this project. All Class-1 solid waste generated by the project through project completion will be disposed at the Florida Department of Environmental Protection-approved Class-1 New River Regional Landfill located in Union County. No significant reduction in the life of the landfill is anticipated as a result of the project.

IMPACT DETERMINATION

The Applicant estimates that the project will generate approximately 9.89 tons of solid waste per day and 3,610 tons of solid waste per year. All Class-1 solid waste generated in Alachua County is deposited at the Alachua County Solid Waste Transfer Station. The solid waste transfer facility is able to accommodate approximately 1,000 tons of solid waste per day and 250,000 tons per year.⁹ The transfer station is able to accommodate all solid waste generated by the project as well as additional solid waste generated as a result of anticipated county population growth through the year 2019 (see Maximum Impact Scenario, Table 7).

⁹Telephone conversation between Steven Dopp, Senior Planner, North Central Florida Regional Planning Council and Thomas Keith, Assistant Public Works Director, Alachua County Public Works Department, July 12, 2010.

Alachua County currently has a contract with the New River Solid Waste Association to dispose all of its Class-1 solid waste from through December 2018 at its landfill located in Union County. The new River Solid Waste Authority estimates that its remaining landfill cells have approximately 1 million tons of remaining capacity. Once these cells are full, one or more new cells will need to be constructed at the landfill site. The Authority estimates that sufficient land exists at the landfill to accommodate solid waste from its current service area (Alachua, Baker, Bradford, Gilchrist, Levy, and Union counties) for the next 50 years.¹⁰

Based upon solid waste generation rates by land use provided by the Applicant, estimated solid waste generation of the direct impacts of the project, at buildout, will be responsible for generating approximately 3,610 tons of solid waste per year.

Table 7 presents a range of New River Regional Landfill solid waste estimates for the years 2010 through 2019. Solid waste generation by population growth attributable to the direct impacts of the project is not expected to have a significant impact on the landfill. Under the Maximum Impact scenario, the project is estimated to shorten the ability of the current cells at the New River Regional Landfill to accept solid waste by approximately two days. Under the Minimum Impact scenario, the project will not affect the remaining length of time that the existing landfill cells will be able to accept solid waste. As with the Maximum Impact scenario, the Moderate Impact scenario suggests that the project will shorten the ability of the current New River Regional Landfill to receive solid waste by approximately one day.

¹⁰Daryl O'Neil, Director, New River Solid Waste Authority, July 26, 2010.

TABLE 7

**ESTIMATED REMAINING CAPACITY OF
EXISTING CELLS AT NEW RIVER LANDFILL
UNDER THREE DIFFERENT SCENARIOS^a**

| YEAR | REMAINING CAPACITY (TONS) | | |
|------|--------------------------------|---------------------------------|--------------------------------|
| | MINIMUM IMPACT ^b | MODERATE IMPACT ^c | MAXIMUM IMPACT ^d |
| 2010 | 279,917 | 279,737 | 279,556 |
| 2011 | (5,995) | (6,536) | (7,078) |
| 2012 | (295,235) | (296,610) | (297,301) |
| 2013 | (587,805) | (589,610) | (591,415) |
| 2014 | (886,703) | (886,410) | (889,118) |
| 2015 | (1,182,930) | (1,186,720) | (1,190,511) |
| 2016 | (1,485,822) | (1,490,875) | (1,495,929) |
| 2017 | (1,792,378) | (1,798,876) | (1,805,373) |
| 2018 | (2,102,599) | (2,110,721) | (2,118,843) |
| 2019 | (2,416,484) | (2,426,411) | (2,436,338) |

Source: North Central Florida Regional Planning Council, July 2010.

^aThe per capita waste generation rate for Alachua County through the year 2019 is calculated base on the 0.73 tons per capita per year standard, as per Capital Improvements Element Policy 1.2.4.C of the Alachua County Comprehensive Plan.

^bThe "Minimum Impact" column assumes that all of the future resident population growth on the project site is included in the 2009 Florida Statistical Abstract medium population projections.

^cThe "Moderate Impact" column assumes that one-half of the future resident population growth on the project site is included in the 2009 Florida Statistical Abstract medium population projections.

^dThe "Maximum Impact" column assumes that none of the future resident population growth on the project site is included in the 2009 Florida Statistical Abstract medium population projections.

Sources: University of Florida, Bureau of Economic and Business Research, 2009 Florida Statistical Abstract, Table 1.41, Gainesville, FL, 2010.

SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, Q 20, page 3.

2001 - 2020 Alachua County Comprehensive Plan, Capital Improvements Element Policy 1.2.4.C, Gainesville, FL. 2010

Daryl O'Neil, New River Solid Waste Authority, July 26, 2010.

IMPACT ON THE PUBLIC FACILITIES OF THE REGION

ENERGY

APPLICABLE REGIONAL GOALS/POLICIES

Regional Goal 2.6. Ensure adequate public utilities and facilities to serve business and industrial development throughout the region.

APPLICANT COMMITMENTS

None.

SUMMARY OF IMPACTS

Adverse impacts of regional significance on energy supply are not anticipated as a result of the project.

IMPACT DETERMINATION

Gainesville Regional Utilities will provide the project site with electricity. The Applicant estimates projected peak-demand electrical demand for the project site as 22,688 kilowatts upon completion. The Applicant estimates average daily natural gas demand as 16,228 therms for the project upon completion. A letter dated June 17, 2008 from Ellen Underwood, New Service Supervisor for Gainesville Regional Utilities, states that the utility has adequate capacity to provide electrical and natural gas service to the project.¹¹

¹¹ Letter dated June 17, 2008 from Ellen Underwood, New Service Supervisor, Gainesville Regional Utilities, to Jason Melancon, Environmental Consulting and Technology. See SantaFe Village Development of Regional Impact Substantial Deviation Application for Development Approval, February 10, 2009, page 29-C-1.

IMPACT ON THE PUBLIC FACILITIES OF THE REGION

EDUCATION

APPLICABLE REGIONAL GOALS/POLICIES

Regional Goal 2.6. Ensure adequate public utilities and facilities to serve business and industrial development throughout the region.

APPLICANT COMMITMENTS

None.

SUMMARY OF IMPACTS

The direct impacts of the project are anticipated to generate 124 elementary school students, 101 middle school students, and 89 high school students. Students generated by the project can be reasonably accommodated by Alachua County public schools.

IMPACT DETERMINATION

A letter dated February 5, 2009 from Terry Tougaw, Director of Community Planning for Alachua County Schools, estimates the number of elementary, middle, and high school students generated by the project site. The letter notes that a new elementary school is planned for the Northwest Gainesville Concurrency Service Area during the ten-year planning period. Mr. Tougaw notes in the letter that the estimated demand can be accommodated within the first five years with existing capacity and can be accommodated over a ten-year period if the planned elementary school is constructed.¹²

¹² Letter dated February 5, 2009 from Terry Tougaw, Director of Community Planning, Alachua County Public Schools, to Ken Zeichner, AICP, Chief of Comprehensive Planning, Alachua County Growth Management Department. See SantaFe Village Development of Regional Impact Substantial Deviation Application for Development Approval, February 10, 2009, page 27-C-1.

IMPACT ON THE PUBLIC FACILITIES OF THE REGION

RECREATION AND OPEN SPACE

APPLICABLE REGIONAL GOALS/POLICIES

Regional Goal 2.6. Ensure adequate public utilities and facilities to serve business and industrial development throughout the region.

Regional Goal 4.5. Protect natural resources of regional significance identified in this plan as "Planning and Resource Management Areas".

APPLICANT COMMITMENTS

- (8) Approximately three acres of passive recreation areas will be provided on the project site in the form of a village green and a central passive-recreation area consisting of a combination of open space fields, wooded trails, gazebos and rain gardens (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q26-1)
- (9) The project site will contain approximately 53 acres of open space. In addition to the 53 acres, general open space surrounding existing and proposed buildings will be provided within the "Mixed Use" area shown on Map H (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q26-1).

SUMMARY OF IMPACTS

Significant adverse impacts are not anticipated to occur to regional recreation and open space as a result of the project.

IMPACT DETERMINATION

San Felasco Hammock State Park and Devil's Millhopper State Geological Site are the closest regional recreation and open spaces to the project site. No significant adverse impacts to these facilities have been identified by the Florida Department of Environmental Protection. Therefore, significant adverse impacts to regional recreation and open space are not anticipated to occur.

IMPACT OF THE PUBLIC FACILITIES OF THE REGION

HEALTH CARE

APPLICABLE REGIONAL GOALS/POLICIES

Regional Goal 2.6. Ensure adequate public utilities and facilities to serve business and industrial development throughout the region.

APPLICANT COMMITMENTS

None.

SUMMARY OF IMPACTS

Significant impacts to regional health care facilities are not anticipated as a result of the project.

IMPACT DETERMINATION

The project proposes to construct a hospital and medical facilities on the project site as well as healthcare-related offices. Additionally, the project site is located near (approximately three miles from) the North Florida Regional Medical Center a 278-bed hospital with a 24-hour emergency room. Additionally Shands Hospital at the University of Florida and a Veterans Administration Hospital are located within Alachua County.

IMPACT ON THE PUBLIC FACILITIES OF THE REGION

POLICE AND FIRE PROTECTION

APPLICABLE REGIONAL GOALS/POLICIES

Regional Goal 2.6. Ensure adequate public utilities and facilities to serve business and industrial development throughout the region.

APPLICANT COMMITMENTS

- (10) Onsite security patrol will be provided by the future SantaFe Village homeowners or property owners association, or a combination thereof (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q25-1).

SUMMARY OF IMPACTS

The direct impacts created by the project will require Alachua County to add four additional sworn officers by project completion in order to maintain the current ratio of sworn officers to unincorporated area residents. It is anticipated that Alachua County Fiore Rescue as well as the Gainesville Fire Department will respond to fires located on the project site.

IMPACT DETERMINATION

Law enforcement protection will be provided by the Alachua County Sheriff's Department. A May 23, 2008 letter from Sadie Darnell, Alachua County Sheriff, to Dawn Sonneborn, indicates that the Sheriff's Office estimates four additional officers will be required when the SantaFe Village Development of Regional Impact Substantial Deviation is fully developed.¹³

No fire station is planned for the project site. The nearest station is No. 16 on Fort Clarke Boulevard, which can respond to the project site in approximately six minutes. In a letter dated June 9, 2008 from Will Gray May, Jr., Director of Alachua County Public Safety, to Dawn Sonneborn, Chief May states that the nearest station is No. 16 on Fort Clarke Boulevard, which has a six-minute response time to the project site. The letter notes that additional fire response resources to a commercial building fire on the project site would be provided by a combination of Alachua County and Gainesville Fire Rescue Service stations.¹⁴

¹³Letter dated May 23, 2008 from Sadie Darnell, Sheriff, Alachua County Sheriff's Office to Dawn Sonneborn, AICP, Associate Vice President, Genesis Group. See SantaFe Village Development of Regional Impact Substantial Deviation Application for Development Approval, February 10, 2009, page 25-B-3.

¹⁴Letter dated June 9, 2008 from Will Gray May, Jr, Director of Public Safety, Alachua County Department of Public Safety, to Dawn Sonneborn, AICP, Associate Vice President, Genesis Group. See SantaFe Village Development of Regional Impact Substantial Deviation Application for Development Approval, February 10, 2009, page 25-B-1.

IMPACT ON PUBLIC TRANSPORTATION FACILITIES OF THE REGION

APPLICABLE REGIONAL GOALS/POLICIES

Regional Goal 5.1. Maintain a regional road network which operates at or above the minimum level of service standard contained in local government comprehensive plans for those segments located outside Transportation Concurrency Exception Areas.

Policy 5.1.6. Develop recommended local government development orders for Developments of Regional Impact which mitigate adverse impacts of the development upon regionally significant transportation facilities.

Policy 5.1.7. Mitigate adverse impacts of development upon regional transportation facilities.

Policy 5.1.8. Mitigate impacts created by development so as to maintain the minimum level of service standard on the Florida Intrastate Highway System (FIHS) as established by the Florida Department of Transportation.

Policy 5.1.9. Mitigate impacts created by development so as to maintain the minimum adopted level of service standard on non-FIHS roads identified in this plan as significant regional transportation facilities as established in local government comprehensive plans.

Policy 5.1.12. Direct future transportation improvements to aid in the management of growth and that promote economic development in designated areas.

Regional Goal 5.5. Increase the percentage of north central Florida residents using public transportation as a primary means of transportation.

Policy 5.5.1. Coordinate with the Gainesville Regional Transit System, the Metropolitan Transportation Planning Agency for the Gainesville Urbanized area, the University of Florida, the City of Gainesville, and Alachua County to provide opportunities through their respective plans and programs for a greater likelihood of increased public transit ridership.

APPLICANT COMMITMENTS

In Section H of the SantaFe Village Development of Regional Impact, First Sufficiency Response and Application for Development Approval Update, Separate Volume for Question 21, February 10, 2009, the Applicant agrees to the following commitments:

- (11) To create dedicated transit lanes by the Applicant from the site, south along NW 83rd Street to NW 23rd Avenue;
- (12) To create a transit corridor through the site from NW 83rd Street west to the adjacent PRIET property;
- (13) To fund its part of bus rapid transit service with 15-minute peak and 25-minute day long headways for 20 years through a Community Development District or other appropriate funding mechanism; and
- (14) To dedicate right-of- way to extend NW 83rd Street into the development as a primary access point and, where applicable, driveways to the existing roadway network will be provided to ensure that the overall roadway network will operate efficiently and remain consistent with the area's Comprehensive Plans and design requirements. These efforts will be coordinated with the City of Gainesville, Alachua County, and Florida Department of Transportation.

SUMMARY OF IMPACTS

The SantaFe Village Development of Regional Impact Substantial Deviation has identified a workable transportation plan – defined as all regional roadways and intersections operating at the adopted level of service standard. However, the Applicant will not construct all of the identified roadway modifications. Instead, the Applicant will pay a proportionate share fee that will be primarily used for a bus rapid transit system as discussed in the preceding section.

As determined by the Applicant, the SantaFe Village Development of Regional Impact Substantial Deviation is projected to generate 2,370 PM peak hour external vehicle trips at build-out in 2019.

ROADWAY IMPACTS

The traffic impact analysis prepared by the Applicant identified five roadway segments as being deficient in 2019 through Phase II. Table 8 lists the roadway modifications needed to maintain the adopted level of service standard.

TABLE 8

**2019 DEFICIENT ROADWAY SEGMENTS
(WITH THE PROJECT)**

| ROAD | SEGMENT | MODIFICATION |
|----------------|----------------------------------|------------------------|
| NW 39th Avenue | NW 98th Street to NW 83rd Street | Widen 4 Lane to 6 Lane |
| NW 39th Avenue | NW 51st Street to NW 13th Street | Widen 4 Lane to 6 Lane |
| Interstate 75 | Newberry Road to NW 39th Avenue | Widen 6 Lane to 8 Lane |
| NW 83rd Street | NW 23rd Avenue to NW 39th Avenue | Widen 2 Lane to 4 Lane |
| NW 43rd Street | Newberry Road to NW 53rd Avenue | Widen 4 Lane to 6 Lane |

Source: SantaFe Village Development of Regional Impact, First Sufficiency Response and Application for Development Approval Update, Separate Volume for Question 21, February 10, 2009, Exhibit 21-14 and Alachua County Transportation Analysis letter dated January 14, 2010, file entitled "SFV_FDOT_RoadwayMitigationAnalysis.

INTERSECTION IMPACTS

Assuming the roadway modifications identified in Table 8 were constructed, the impacted intersections were analyzed by the Applicant to determine whether additional intersection modifications are needed to maintain the adopted level of service standard and show that each movement would operate at a volume-to-capacity ratio of 0.99 or less. Table 9 provides a summary of the 31 intersections analyzed and identifies intersections that require modifications in addition to the roadway widenings listed in Table 8.

TABLE 9

INTERSECTION IMPACTS

| INTERSECTION NUMBER | INTERSECTION | MODIFICATIONS |
|------------------------------|--|---|
| REGIONAL ROAD NETWORK | | |
| 3 | NW 39th Avenue & Interstate 75 Southbound Off Ramp | No modifications required. |
| 4 | NW 39th Avenue & Interstate 75 Northbound Off Ramp | <u>Phase 1-</u> Construct westbound additional through lane. |
| 5 | NW 39th Avenue & NW 92nd Court | No modifications required. |
| 6 | NW 39th Avenue & NW 91st Street | <p><u>Phase 1-</u> Construct eastbound and westbound additional through lanes, change northbound shared left/thru/right to thru/right, remove northbound and southbound split timing.</p> <p><u>Phase 2-</u> Construct eastbound additional left turn lane, eastbound right turn lane, westbound right turn lane, southbound additional left turn lane.</p> |
| 7 | NW 39th Avenue & NW 83rd Street | <p><u>Phase 1-</u> Construct eastbound left and right turn lanes, westbound additional left turn lane.</p> <p><u>Phase 2-</u> Construct northbound additional left turn lane, northbound right turn lane, PM signal timing adjustment.</p> |

TABLE 9 (Continued)

INTERSECTION IMPACTS

| INTERSECTION NUMBER | INTERSECTION | MODIFICATIONS |
|----------------------------|------------------------------------|--|
| 8 | NW 39th Avenue & NW 51st Street | <p><u>Phase 1-</u> Construct westbound additional left turn lane, eastbound and northbound right turn lanes.</p> <p><u>Phase 2-</u> Construct AM and PM signal timing adjustment.</p> |
| .9 | NW 39th Avenue & NW 43rd Street | <p><u>Phase 1-</u> Construct southbound additional right turn lane.</p> <p><u>Phase 2-</u> Construct southbound additional left turn lane, AM and PM signal timing adjustments.</p> |
| 10 | NW 39th Avenue & NW 34th Street | <p><u>Phase 1-</u> Construct eastbound additional left turn lane.</p> <p><u>Phase 2-</u> Construct westbound and northbound additional left turn lanes, AM and PM signal timing adjustments.</p> |
| 11 | NW 39th Avenue & NW 29th Terrace | No modifications required. |
| 12 | NW 39th Avenue & NW 24th Boulevard | No modifications required. |
| 13 | NW 39th Avenue & NW 19th Street | No modifications required. |

TABLE 9 (Continued)

INTERSECTION IMPACTS

| INTERSECTION NUMBER | INTERSECTION | MODIFICATIONS |
|----------------------------|---|--|
| 14 | NW 39th Avenue & NW 13th Street | <u>Phase 1-</u> Construct eastbound and westbound additional left turn lanes, northbound additional two (2) left turn lanes, AM and PM signal timing adjustments. <u>Phase 2-</u> Construct southbound additional left turn lane. |
| 21 | Newberry Road & NW 143rd Street | <u>Phase 1-</u> AM and PM signal timing adjustments. |
| 22 | Newberry Road & NW 98th Street | No modifications required. |
| 23 | Newberry Road & Ft. Clarke Boulevard | <u>Phase 1-</u> Construct eastbound additional left turn lane, westbound right turn lane, AM and PM signal timing adjustments. |
| 24 | Newberry Road & Interstate 75 Southbound Off Ramp | <u>Phase 1-</u> Construct eastbound right turn lane, alter northbound existing shared thru/left and separate right to separate left and shared thru/right configuration. |
| 25 | Newberry Road & Interstate 75 Northbound Off Ramp | <u>Phase 1-</u> Construct northbound additional left turn lane, westbound right turn lane. |
| LOCAL ROADS | | |
| 1 | NW 39th Avenue & NW 143rd Street | No modifications required. |

TABLE 9 (Continued)

INTERSECTION IMPACTS

| INTERSECTION NUMBER | INTERSECTION | MODIFICATIONS |
|----------------------------|--|---|
| 2 | NW 39th Avenue & NW 98th Street | No modifications required. |
| 15 | NW 23rd Avenue & NW 98th Street | No modifications required. |
| 16 | NW 23rd Avenue & Ft. Clarke Boulevard | <u>Phase 1</u> - PM signal timing adjustment.. |
| 17 | NW 23rd Avenue & NW 83rd Street | No modifications required. |
| 18 | NW 23rd Avenue & NW 55th Street | <u>Phase 1</u> - Construct northbound left turn lane, remove northbound and southbound split timing, AM and PM signal timing adjustments. |
| 19 | NW 23rd Avenue & NW 51st Street | No modifications required. |
| 20 | NW 23rd Avenue & NW 43rd Street | <u>Phase 1</u> - Construct northbound additional left turn lane, eastbound, westbound and southbound right turn lanes. |
| 26 | NW 83rd Street & North Santa Fe College Road | No modifications required. |
| 27 | NW 83rd Street & South Santa Fe College Road | No modifications required. |
| 28 | NW 25th Place & NW 43rd Street | No modifications required. |
| 29 | NW 28th Lane & NW 43rd Street | No modifications required. |
| 30 | NW 51st Place & NW 43rd Street | No modifications required. |

TABLE 9 (Continued)

INTERSECTION IMPACTS

| INTERSECTION NUMBER | INTERSECTION | MODIFICATIONS |
|----------------------------|---------------------------------|--|
| 31 | NW 53rd Avenue & NW 43rd Street | <p><u>Phase 1-</u> Construct westbound additional two left turn lanes, northbound and southbound right turn lanes.</p> <p><u>Phase 2-</u> Construct northbound additional left turn lane, AM and PM signal timing adjustments.</p> |

Source: SantaFe Village Development of Regional Impact, First Sufficiency Response and Application for Development Approval Update, Separate Volume for Question 21, February 10, 2009, Exhibit 21-24 and 21-25.

SantaFe Village Development of Regional Impact Substantial Deviation, Third Sufficiency Review Response, Appendix B-1, January 4, 2010.

IMPACT DETERMINATION

The Council conducted an evaluation of the transportation impacts of the project in accordance with an agreed-upon transportation methodology entitled, SantaFe Health Park Transportation Methodology, which is contained in a document entitled, SantaFe Village Development of Regional Impact, First Sufficiency Review Response and Application for Development Approval Update, Separate Volume for Question 21, February 10, 2009, Appendix 21-E. The Applicant and the Council executed a transportation methodology for the SantaFe Village Development of Regional Impact Substantial Deviation on January 27, 2008. The Council has reviewed the transportation analysis provided by the Applicant and concludes that it is consistent with the transportation methodology.

METHODOLOGY

STANDARDS AND LEVELS OF SERVICE

Alachua County- The level of service standards that are used to evaluate the transportation impacts of this project within unincorporated Alachua County are contained in Alachua County’s adopted Comprehensive Plan – Transportation Element and shown in the following chart.

| TYPE OF FACILITY | | LEVEL OF SERVICE STANDARDS | | |
|-------------------|------------------------------|----------------------------|---------------|-------|
| | | URBANIZED | TRANSITIONING | RURAL |
| Intrastate | Limited Access Highway | C | C | B |
| | Controlled Access | C | C | B |
| Other State Roads | Other Multi-lane | D | C | B |
| | Two-Lane | D | D | D |
| Nonstate Roads | County-Maintained Facilities | D | D | D |

City of Gainesville- The level of service standards that are used to evaluate the transportation impacts of this project within the City of Gainesville are contained in the City of Gainesville’s adopted Comprehensive Plan- Transportation Element. According to this information, the standards are level of service C for all intrastate highways, level of service D for all other State roads and all County roads and level of service E for City roads. In addition, significant portions of the City are included within transportation concurrency exception areas.

PROPOSED TRANSPORTATION DEMAND MANAGEMENT STRATEGIES

According to page 21-41 of the SantaFe Village Development of Regional Impact, First Sufficiency Review Response and Application for Development Approval Update, Separate Volume for Question 21, February 10, 2009

“The SantaFe Village Development of Regional Impact is proposing a transit-based community that will make a substantial contribution toward a transition from a nearly completely auto-dependant development pattern within unincorporated Alachua County to one that is transit-based, a more sustainable land use pattern that ensures greater efficiency and effective utilization of community resources and facilities. The SantaFe Village companion comprehensive plan amendment application package provides policies that represent what may be the most complete implementation of the County’s policies favoring sustainability ever applied to a single site. In addition to proposing detailed design requirements ensuring high quality urban form, commitment to permanent and sustainable public transit, the SantaFe Village Comprehensive Plan Amendment requires that all of the Alachua County Transportation Concurrency Exception for Projects Promoting Public Transit policies contained in Transportation Mobility Element Polices 1.2.10-1.2.13 are met. Those policies also require adherence to the Traditional Neighborhood Development design requirements contained in the Future Land Use Element.

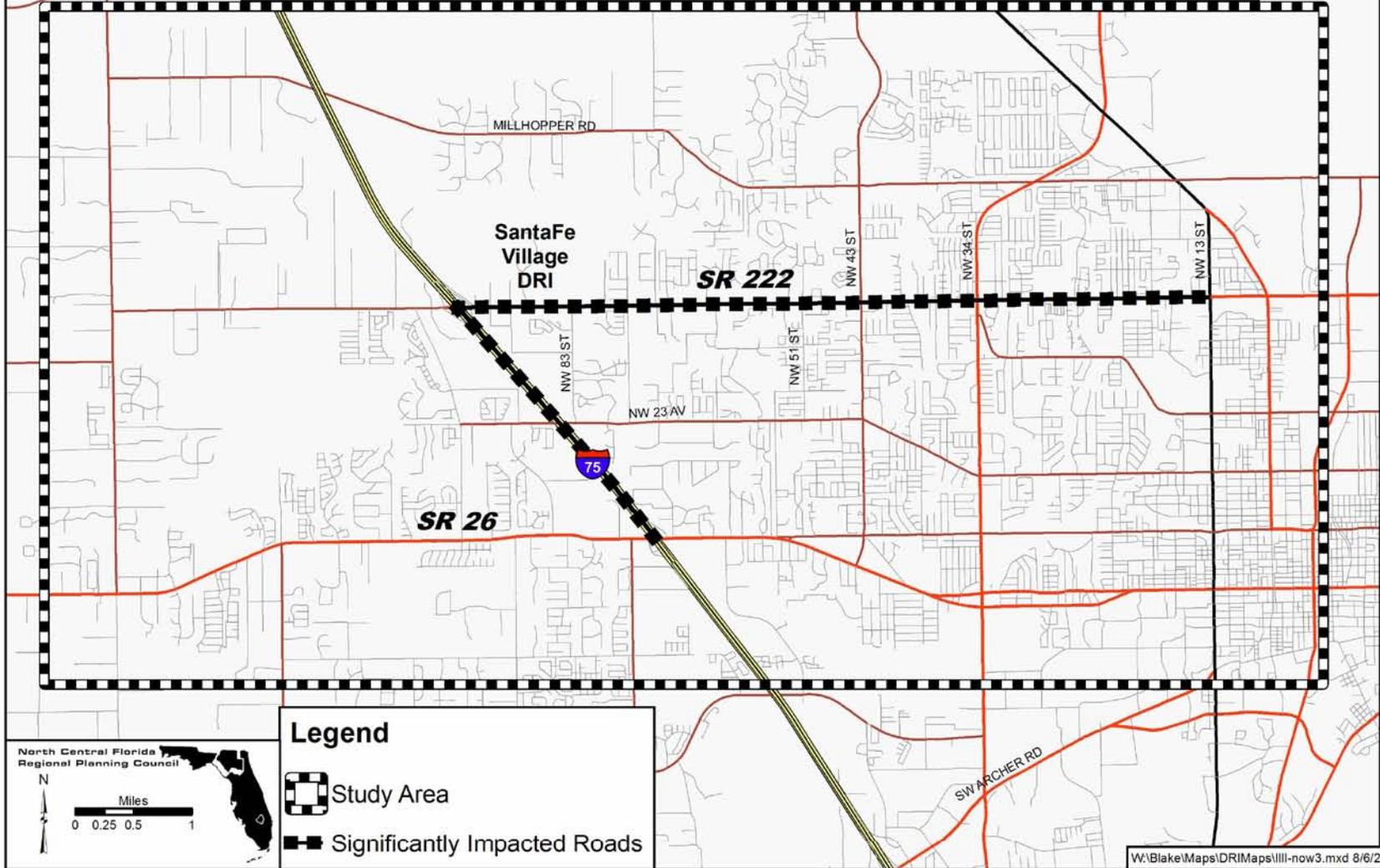
The draft SantaFe Village Development of Regional Impact development order requires creation of dedicated transit lanes by the Applicant from the site, south along NW 83rd Street to NW 23rd Avenue. It also requires creation of a transit corridor through the site from NW 83rd Street west to the adjacent PRIET property. The proposed Comprehensive Plan Amendment and draft development order require funding of bus rapid transit with 15 minute peak and 25 minute day long headways. The Applicant is required to fund its part of the service for 20 years through a Community Development District or other appropriate funding mechanism. These measures are being paired with the Comprehensive Plan Amendment recently approved by the Alachua Board of County Commissioners and the Florida Department of Community Affairs for the Newberry Village transit-oriented development within the Oaks Mall Activity Center, in order to establish effective rapid transit between the site, Santa Fe College, Newberry Village and the Oaks Mall.

Once implemented, this investment in transit will divert a significant number of automotive trips to transit. Detailed urban design standards are proposed with the SantaFe Village Comprehensive Plan Amendment and Development of Regional Impact development order that ensure creation of quality urban space. Extensive standards are provided to ensure pedestrian comfort and mobility. Sidewalks are required throughout as well as bicycle facilities.”

Illustration IV shows segments of the regional road network that are significantly and adversely impacted by the Year 2019 as identified by the Applicant and based upon information contained in Exhibit 21-21 of the document entitled SantaFe Village Development of Regional Impact, First Sufficiency Review Response and Application for Development Approval Update, Separate Volume for Question 21, February 21, 2009. These include the following:

- Interstate 75- Newberry Road north to NW 39th Avenue
- State Road 222- Interstate 75 east to NW 83rd Street
 (NW 39th Avenue)
- State Road 222- NW 51st Street east to U.S. 441 (NW 13th Street)
 (NW 39th Avenue)

ILLUSTRATION III
SantaFe Village DRI Substantial Deviation - Year 2019
Regional Road Network - All Segments of Significantly Impacted Roads

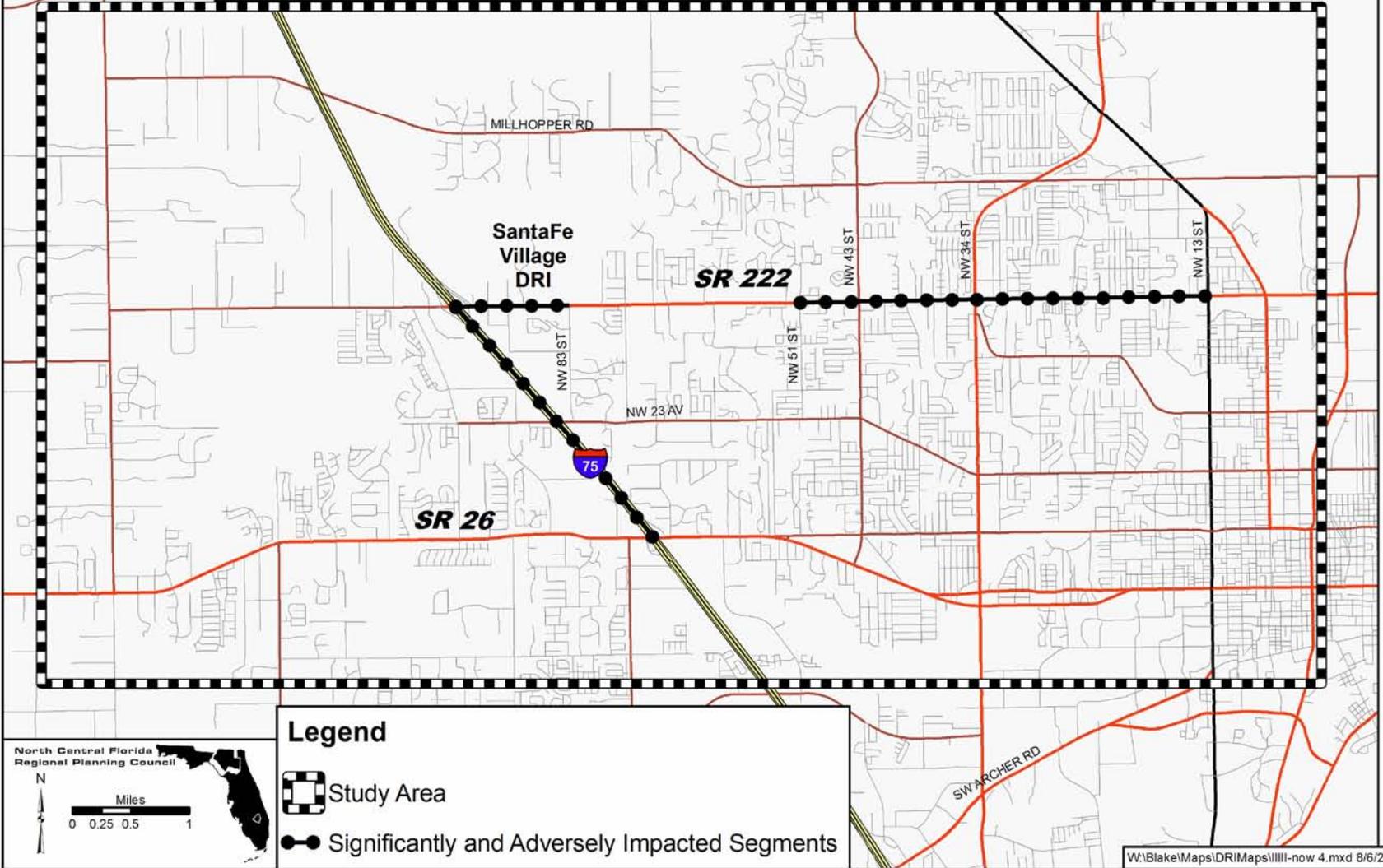


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ILLUSTRATION IV

SantaFe Village DRI Substantial Deviation - Year 2019

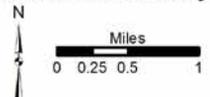
Regional Roads - Significantly and Adversely Impacted Segments



Legend

-  Study Area
-  Significantly and Adversely Impacted Segments

North Central Florida
Regional Planning Council



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REGIONAL ROAD NETWORK - INTERSECTIONS/INTERCHANGES

The procedures that are used to determine if modifications are needed at regional intersections include testing to determine if the impacts are both significant and adverse. These terms are defined, as follows:

significant- Development of Regional Impact traffic is determined to be *significant* if it uses five percent or more of the adopted peak hour level of service maximum service volume of the facility.

adverse- Development of Regional Impact traffic is determined to have an *adverse* impact when the facility is projected to be operating below the adopted level of service standard.

The procedures used to analyze intersections include the following three tests. If the results of the above tests are significant and adverse impact, the Development of Regional Impact is required to mitigate the turning movement or movements that are adversely affected.

- Test 1 -** Is a signalized intersection located on a portion of the State Highway System significantly impacted by a Development of Regional Impact?
- Test 2 -** Is the total Development of Regional Impact traffic in the intersection from Test 1 five percent or more of the total intersection capacity at the adopted level service standard?
- Test 3 -** For intersections that meet both Test 1 and 2, is a failing turning movement five percent or more of the lane group capacity for that movement at the adopted level of service?

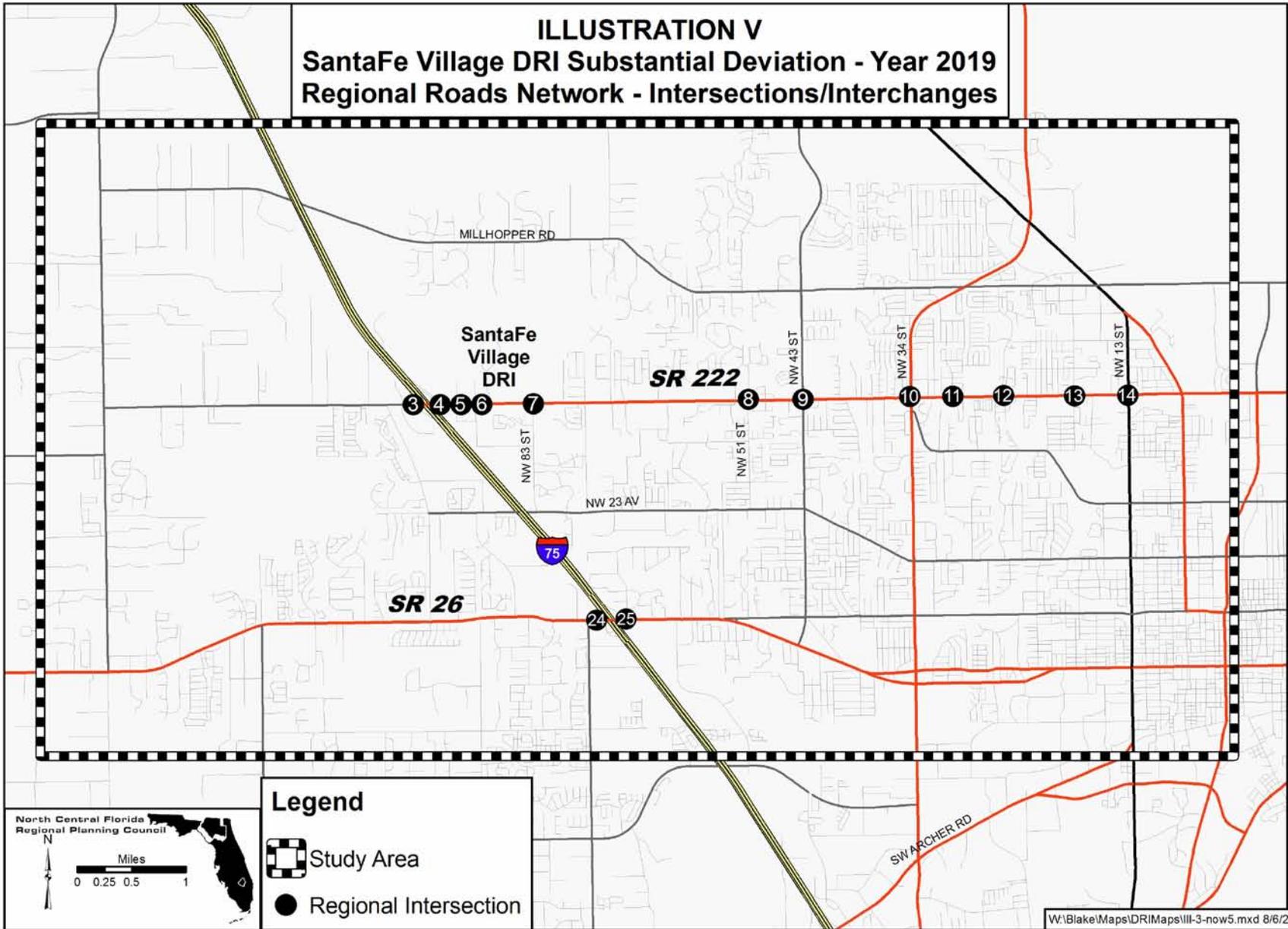
Intersections/Interchanges Analyzed

A detailed traffic operations analysis has been performed by the Applicant for the regionally significant intersections listed below and shown in Illustration V.

| | |
|------------------------------------|--|
| Interstate 75 | at Interstate 75 Southbound Off Ramp and NW 39th Avenue at Interstate 75 Northbound Off Ramp and NW 39th Avenue at Interstate 75 Southbound Off Ramp and Newberry Road at Interstate 75 Northbound Off Ramp and Newberry Road |
| State Road 222 (NW 39th Avenue) | at NW 92nd Court at NW 91st Street at NW 83rd Street at NW 51st Street at NW 43rd Street at NW 34th Street at NW 29th Terrace at NW 24th Boulevard at NW 19th Street at NW 13th Street |

ILLUSTRATION V

SantaFe Village DRI Substantial Deviation - Year 2019 Regional Roads Network - Intersections/Interchanges



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LOCAL ROAD NETWORK – ROADWAY SEGMENTS

Illustration VI shows local roads which are significantly impacted by this project based upon information contained in Exhibit 21-1 of the document entitled SantaFe Village Development of Regional Impact, First Sufficiency Review Response and Application for Development Approval Update, Separate Volume for Question 21, February 21, 2009. This network includes all segments of local roads that are being significantly impacted by the SantaFe Village Development of Regional Impact Substantial Deviation. These include the following:

| | |
|------------------------------------|---|
| NW 143rd Street | State Road 222 (NW 39th Avenue) to Newberry Road |
| NW 83rd Street | State Road 222 (NW 39th Avenue) to NW 23rd Avenue |
| NW 43rd Street | NW 53rd Avenue to Newberry Road |
| State Road 222 (NW 39th Avenue) | NW 143rd Street to Interstate 75 |
| NW 23rd Avenue | NW 98th Street to NW 43rd Street |
| Fort Clarke Boulevard | NW 23rd Avenue to Newberry Road |

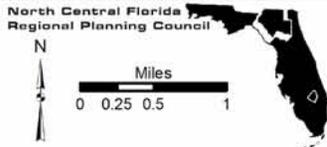
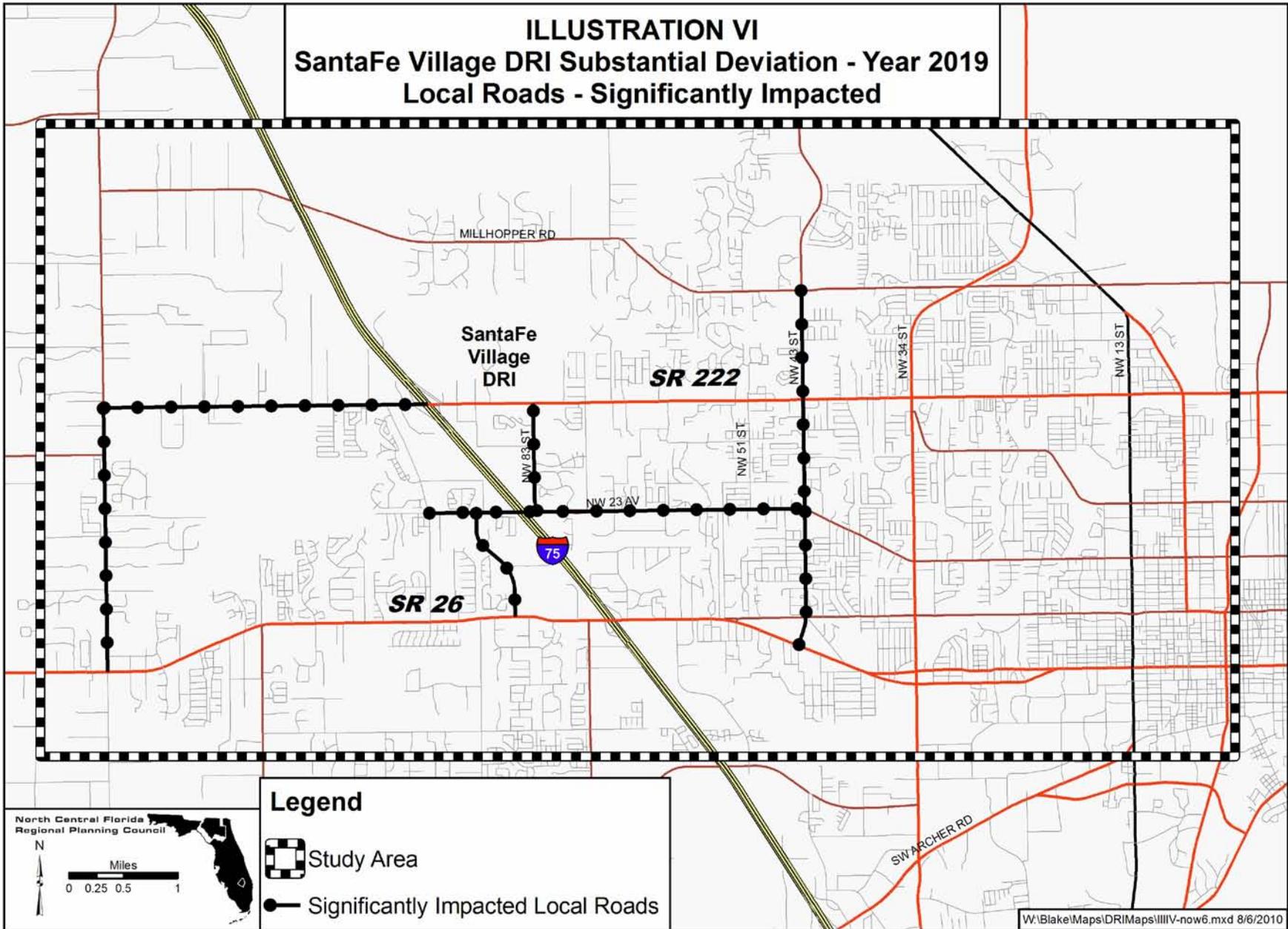
LOCAL ROAD NETWORK – INTERSECTIONS

A detailed traffic operations analysis has been performed by the Applicant for each of the locally significant intersections listed below and shown in Illustration VII.

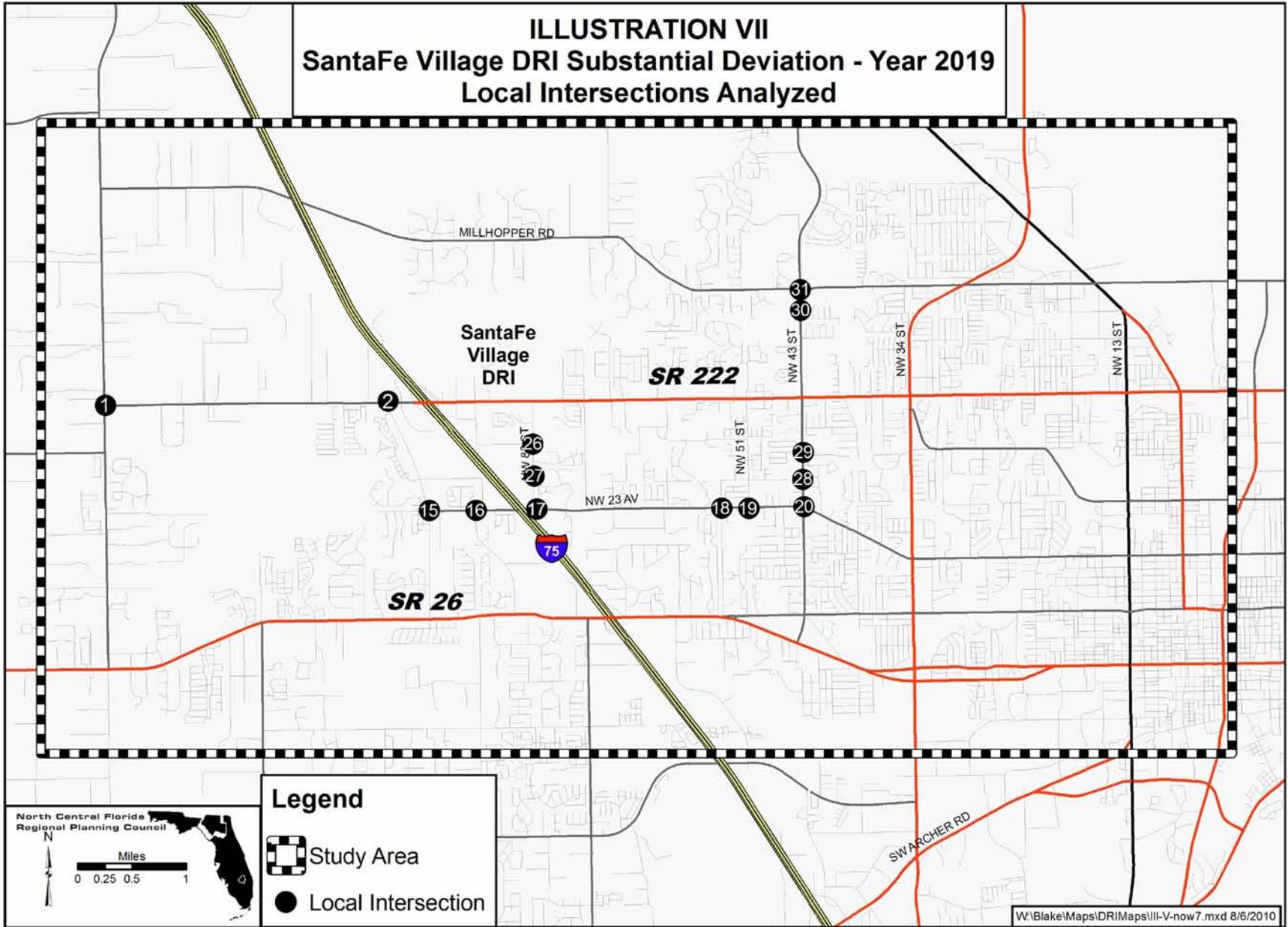
| | |
|------------------------------------|---|
| State Road 222 (NW 39th Avenue) | at NW 143rd Street at NW 98th Street |
| NW 23rd Avenue | at NW 98th Street at Fort Clarke Boulevard at NW 83rd Street at NW 55th Street at NW 51st Street at NW 43rd Street |
| W 83rd Street | at North Santa Fe College Road at South Santa Fe College Road |
| NW 43rd Street | at NW 25th Place at NW 28th Lane at NW 51st Place at NW 53rd Avenue |

ILLUSTRATION VI SantaFe Village DRI Substantial Deviation - Year 2019 Local Roads - Significantly Impacted

IS



- Legend**
- Study Area
 - Significantly Impacted Local Roads



SUMMARY OF IMPACTS

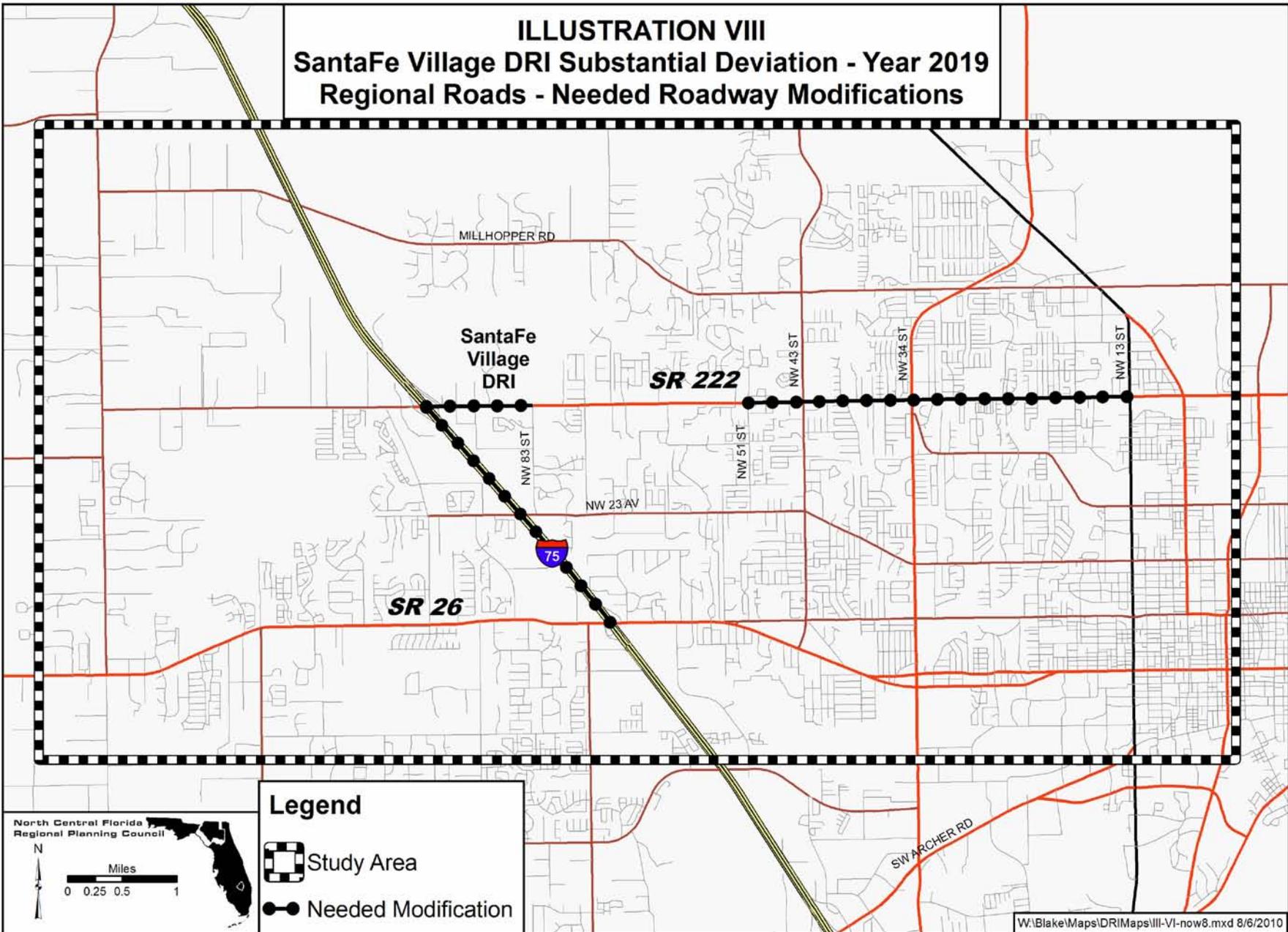
TRANSPORTATION MODIFICATIONS NEEDED AS A RESULT OF THIS PROJECT

This section discusses transportation modifications that are needed to maintain an acceptable level of service for both roadway segments and intersections through the Year 2019.

REGIONAL IMPACTS - ROADWAY SEGMENTS

Illustration IIX and Table 10 identify needed roadway segment modifications on the Regional Road Network through the Year 2019. This illustration and table include modifications that have been identified earlier in this report as projects that are required in order to maintain acceptable level of service standards. Applicant proportionate share costs are as determined by Alachua County Growth Management Department.

ILLUSTRATION VIII SantaFe Village DRI Substantial Deviation - Year 2019 Regional Roads - Needed Roadway Modifications



Legend

- Study Area
- Needed Modification

North Central Florida
Regional Planning Council

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TABLE 10
NEEDED ROADWAY MODIFICATIONS - REGIONAL
SANTAFE VILLAGE DEVELOPMENT FOR REGIONAL IMPACT SUBSTANTIAL
DEVIATION- YEAR 2019
(2010 DOLLARS)

| YEAR 2019 MODIFICATION | TOTAL COST | APPLICANT'S PROPORTIONATE SHARE COST |
|---|--------------|--|
| INTERSTATE 75 | | |
| Interstate 75- State Road 222 (NW 39th Avenue) south to Newberry Road- widen from six lanes to eight lanes | \$19,310,836 | \$3,450,733 |
| STATE ROAD 222 (NW 39TH AVENUE) | | |
| State Road 222 (NW 39th Avenue) – Interstate 75 southbound ramps to Interstate 75 northbound ramps – widen from four lanes to six lanes | \$1,716,254 | \$572,813 |
| State Road 222 (NW 39th Avenue) – Interstate 75 northbound ramps to NW 92nd Court – widen from four lanes to six lanes | \$1,343,155 | \$762,262 |
| State Road 222 (NW 39th Avenue) – NW 92nd Court to NW 91st Street – widen from four lanes to six lanes | \$1,266,535 | \$719,914 |
| State Road 222 (NW 39th Avenue) – NW 91st Street to NW 83rd Street – widen from four lanes to six lanes | \$3,954,845 | \$1,758,269 |
| State Road 222 (NW 39th Avenue) – NW 51st Street to NW 43rd Street – widen from four lanes to six lanes | \$3,805,606 | \$1,261,029 |
| State Road 222 (NW 39th Avenue) – NW 43th Street to NW 34th Street – widen from four lanes to six lanes | \$7,461,972 | \$1,470,318 |
| State Road 222 (NW 39th Avenue) – NW 34th Street to NW 29th Terrace – widen from four lanes to six lanes | \$2,835,549 | \$323,823 |
| State Road 222 (NW 39th Avenue) – NW 29th Terrace to NW 24th Boulevard – widen from four lanes to six lanes | \$3,432,507 | \$387,934 |
| State Road 222 (NW 39th Avenue) – NW 24th Boulevard to NW 19th Street – widen from four lanes to six lanes | \$4,924,901 | \$498,318 |
| State Road 222 (NW 39th Avenue) – NW 19th Street to NW 13th Street – widen from four lanes to six lanes | \$3,730,986 | \$377,514 |

Source: Alachua County Transportation Analysis letter dated January 14, 2010, file entitled FV_FDOT_RoadwayMitigationAnalysis.

REGIONAL IMPACTS - INTERSECTIONS ON REGIONAL FACILITIES

State Road 222 (NW 39th Avenue)

This section reports intersection analyses as prepared by the Applicant for State Road 222 (NW 39th Avenue) from Interstate 75 east to U.S. 441 (NW 13th Street). Appendix 21-C of the document entitled SantaFe Village Development of Regional Impact, First Sufficiency Review Response and Application for Development Approval Update, Separate Volume for Question 21, February 21, 2009 contains detailed intersection information for State Road 222.

Existing Intersection Conditions

Table 11 shows current overall intersection traffic conditions without the SantaFe Village Development of Regional Impact Substantial Deviation project study area. The current intersection level of service along State Road 222 (NW 39th Avenue) without the project ranges from Level of Service A to F.

TABLE 11

**INTERSECTION LEVEL OF SERVICE
SANTAFE VILLAGE DEVELOPMENT OF REGIONAL
IMPACT SUBSTANTIAL DEVIATION - EXISTING CONDITIONS**

| STATE ROAD 222 INTERSECTION | OVERALL INTERSECTION LEVEL OF SERVICE | |
|-----------------------------------|---------------------------------------|----|
| | AM | PM |
| Interstate 75 Southbound Off Ramp | B | A |
| Interstate 75 Northbound Off Ramp | C | D |
| NW 92nd Court | A | B |
| NW 91st Street | A | C |
| NW 83rd Street | C | C |
| NW 51st Street | F | D |
| NW 43rd Street | E | F |
| NW 34th Street | E | E |
| NW 29th Terrace | B | A |
| NW 24th Boulevard | C | B |
| NW 19th Street | B | C |
| NW 13th Street | F | F |

Source: SantaFe Village Development of Regional Impact, First Sufficiency Response and Application for Development Approval Update, Separate Volume for Question 21, February 21, 2009, Appendix 21-C.

Year 2019 Intersection Conditions Without the Project

Table 12 shows what overall intersection traffic conditions are projected to be in the Year 2019 without the SantaFe Village Development of Regional Impact Substantial Deviation project. The projected intersection level of service in the Year 2019 along State Road 222 (NW 39th Avenue) without the project ranges from Level of Service A to F.

TABLE 12
INTERSECTION LEVEL OF SERVICE
WITHOUT SUBSTANTIAL DEVIATION – YEAR 2019

| STATE ROAD 222 INTERSECTION | OVERALL INTERSECTION LEVEL OF SERVICE | |
|-----------------------------------|---------------------------------------|----|
| | AM | PM |
| Interstate 75 Southbound Off Ramp | C | A |
| Interstate 75 Northbound Off Ramp | E | E |
| NW 92nd Court | C | B |
| NW 91st Street | B | C |
| NW 83rd Street | C | C |
| NW 51st Street | F | E |
| NW 43rd Street | F | F |
| NW 34th Street | F | F |
| NW 29th Terrace | B | A |
| NW 24th Boulevard | C | B |
| NW 19th Street | C | C |
| NW 13th Street | F | F |

Source: Genesis Group Traffic Attachment C, SantaFe Village Development of Regional Impact Transportation Mitigation Analysis, November 11, 2009, Appendix A.

Year 2019 Intersection Conditions With the Project and Without Modifications

Table 13 shows what overall intersection traffic conditions are projected to be in the Year 2019 along State Road 222 (NW 39th Avenue) with the SantaFe Village Development of Regional Impact Substantial Deviation project and without any intersection modifications. The projected intersection level of service in the Year 2019 along State Road 222 (NW 39th Avenue) with the project and without modifications ranges from Level of Service A to F.

TABLE 13
INTERSECTION LEVEL OF SERVICE
WITH SUBSTANTIAL DEVIATION (WITHOUT MODIFICATIONS) -
YEAR 2019

| STATE ROAD 222 INTERSECTION | OVERALL INTERSECTION LEVEL OF SERVICE | |
|-----------------------------------|---------------------------------------|----|
| | AM | PM |
| Interstate 75 Southbound Off Ramp | B | A |
| Interstate 75 Northbound Off Ramp | F | F |
| NW 92nd Court | E | D |
| NW 91st Street | E | F |
| NW 83rd Street | F | F |
| NW 51st Street | F | F |
| NW 43rd Street | F | F |
| NW 34th Street | F | F |
| NW 29th Terrace | B | B |
| NW 24th Boulevard | B | B |
| NW 19th Street | C | C |
| NW 13th Street | F | F |

Source: Genesis Group Traffic Attachment B (Approved by Alachua County), SantaFe Village Development of Regional Impact Transportation Mitigation Analysis, November 20, 2009, Appendix C.

Year 2019 Intersection Conditions With the Project and With Modifications

Table 14 shows what overall intersection traffic conditions are projected to be in the Year 2019 along State Road 222 (NW 39th Avenue) with the SantaFe Village Development of Regional Impact Substantial Deviation project and with intersection modifications. The projected intersection level of service in the Year 2019 along State Road 222 (NW 39th Avenue) with the project and with modifications ranges from Level of Service A to D.

TABLE 14
INTERSECTION LEVEL OF SERVICE WITH
SANTAFE VILLAGE DEVELOPMENT FOR REGIONAL IMPACT SUBSTANTIAL
DEVIATION
(WITH MODIFICATIONS) - YEAR 2019

| STATE ROAD 222 INTERSECTION | OVERALL INTERSECTION LEVEL OF SERVICE | |
|-----------------------------------|---------------------------------------|----|
| | AM | PM |
| Interstate 75 Southbound Off Ramp | B | A |
| Interstate 75 Northbound Off Ramp | C | C |
| NW 92nd Court | B | B |
| NW 91st Street | C | D |
| NW 83rd Street | D | D |
| NW 51st Street | D | D |
| NW 43rd Street | D | D |
| NW 34th Street | D | D |
| NW 29th Terrace | B | A |
| NW 24th Boulevard | B | B |
| NW 19th Street | B | B |
| NW 13th Street | D | D |

Source: Genesis Group Traffic Attachment B (Approved by Alachua County), SantaFe Village Development of Regional Impact Transportation Mitigation Analysis, November 20, 2009, Appendix C.

COST ESTIMATES AND PROPORTIONATE SHARE

REGIONAL ROADWAY FACILITIES

Table 15 shows both total costs and proportionate share costs of regional roadway facilities as determined by the Alachua County Growth Management Department that are significantly and adversely impacted by the project.

TABLE 15

**PROPORTIONATE SHARE COSTS (2010 DOLLARS)
REGIONAL ROADWAY FACILITIES**

| LINK NUMBER | SEGMENT | PERCENT PROPORTIONATE SHARE | TOTAL COSTS | PROPORTIONATE SHARE COSTS |
|--|--|------------------------------------|---------------------|----------------------------------|
| STATE ROAD 222 (NW 39th AVENUE) | | | | |
| S-29(B) | I-75 SB Ramps to I-75 Northbound Ramps | 33.4% | \$1,716,254 | \$572,813 |
| S-29(C) | I-75 NB Ramps to NW 92nd Court | 56.8% | \$1,343,155 | \$762,262 |
| S-29(D) | NW 92nd Court to NW 91st Street | 56.8% | \$1,268,535 | \$719,914 |
| S-29(E) | NW 91st Street to NW 83rd Street | 44.5% | \$3,954,845 | \$1,758,269 |
| S-53(A) | NW 51st Street to NW 43rd Street | 33.1% | \$3,805,606 | \$1,261,029 |
| S-53-(B) | NW 43rd Street to NW 34th Street | 19.7% | \$7,461,972 | \$1,470,318 |
| S-53(C) | NW 34th Street to NW 29th Terrace | 11.4% | \$2,835,549 | \$323,823 |
| S-53(D) | NW 29th Terrace to NW 24th Boulevard | 11.3% | \$3,432,507 | \$387,934 |
| S-53(E) | NW 24th Boulevard to NW 19th Street | 10.1% | \$4,924,901 | \$498,318 |
| S-53(F) | NW 19th Street to NW 13th Street | 10.1% | \$3,730,986 | \$377,514 |
| INTERSTATE 75 | | | | |
| S-43 | Newberry Road to NW 39th Avenue | 17.9% | \$19,310,836 | \$3,450,733 |
| TOTAL | | | \$53,785,146 | \$11,582,927 |

Source: Alachua County Growth Management letter dated May 13, 2010 to the Florida Department of Community Affairs, Roadway Segment Transportation Mitigation Analysis, SantaFe Village Development of Regional Impact.

REGIONAL INTERSECTION FACILITIES

Table 16 shows both total costs and proportionate share costs of regional intersection facilities as determined by the Alachua County Growth Management Department that are significantly and adversely impacted by the project.

TABLE 16
PROPORTIONATE SHARE COSTS (2010 DOLLARS)
REGIONAL INTERSECTION FACILITIES

| INTERSECTION NUMBER | INTERSECTION | PERCENT OF PROPORTIONATE SHARE | TOTAL COSTS | PROPORTIONATE SHARE COSTS |
|----------------------------|--------------------------------------|---------------------------------------|---------------------|----------------------------------|
| NW 39th AVENUE | | | | |
| 4 | at Interstate 75 Northbound Off Ramp | 54.8% | \$898,222 | \$492,108 |
| 6 | at NW 91st Street | 100.0% | \$534,838 | \$534,838 |
| 7 | at NW 83rd Street | 68.6% | \$385,354 | \$264,227 |
| 8 | at NW 51st Street | 19.1% | \$816,702 | \$155,611 |
| 9 | at NW 43rd Street | 17.5% | \$565,080 | \$98,643 |
| 10 | at NW 34th Street | 19.5% | \$1,133,541 | \$221,052 |
| 14 | at NW 13th Street | 2.3% | \$10,519,095 | \$239,135 |
| NEWBERRY ROAD | | | | |
| 23 | at Fort Clarke Boulevard | 6.6% | \$1,371,763 | \$91,085 |
| 24 | at Interstate 75 Southbound Off Ramp | 7.6% | \$863,019 | \$65,806 |
| 25 | at Interstate 75 Northbound Off Ramp | 16.8% | \$637,230 | \$107,081 |
| TOTAL | | | \$17,724,844 | \$2,269,586 |

Source: Alachua County Growth Management letter dated May 13, 2010 to the Florida Department of Community Affairs, Exhibit 2: Preliminary Opinion of Probable Cost/Proportionate Share Summary, Santa Fe Village Development of Regional Impact.

LOCAL ROADWAY FACILITIES

Table 17 shows both total costs and proportionate share costs of local roadway facilities as determined by the Alachua County Growth Management Department that are significantly and adversely impacted by the project.

TABLE 17
PROPORTIONATE SHARE COSTS (2010 DOLLARS)
LOCAL ROADWAY FACILITIES

| LINK NUMBER | SEGMENT | PERCENT PROPORTIONATE SHARE | TOTAL COSTS | PROPORTIONATE SHARE COSTS |
|-----------------------|--|------------------------------------|---------------------|----------------------------------|
| NW 39th AVENUE | | | | |
| S-29 (A) | NW 98th Street to I-75 Southbound Ramps | 8.9% | \$1,641,634 | \$145,342 |
| NW 83rd STREET | | | | |
| A-23 (A) | NW 23rd Avenue to South Santa Fe College Road | 19.6% | \$2,037,477 | \$399,659 |
| A-23 (B) | South Santa Fe College Road to North Santa Fe College Road | 22.8% | \$2,933,966 | \$669,546 |
| A-23 (C) | North Santa Fe College Road to State Road 222 (NW 39th Avenue) | 26.0% | \$3,178,463 | \$825,178 |
| NW 43rd STREET | | | | |
| A-3 (A) | Newberry Road to NW 8th Avenue | 7.8% | \$2,014,732 | \$157,842 |
| A-3 (B) | NW 8th Avenue to NW 23rd Avenue | 7.8% | \$7,461,972 | \$584,600 |
| A-3 (C) | NW 23rd Avenue to NW 25th Place | 1.6% | \$1,343,155 | \$21,388 |
| A-3 (D) | NW 25th Place to NW 28th Lane | 1.7% | \$1,492,394 | \$24,715 |
| A-3 (E) | NW 28th Lane to State Road 222 (NW 39th Avenue) | 1.7% | \$4,701,042 | \$77,852 |
| A-3 (F) | NW 39th Avenue to NW 51st Place | 9.7% | \$6,268,056 | \$610,836 |
| A-3 (G) | NW 51st Place to NW 53rd Avenue | 7.2% | \$1,193,915 | \$85,931 |
| TOTAL | | | \$34,266,806 | \$3,602,889 |

Source: Alachua County Growth Management letter dated May 13, 2010 to the Florida Department of Community Affairs, Roadway Segment Transportation Mitigation Analysis, SantaFe Village Development of Regional Impact.

LOCAL INTERSECTION FACILITIES

Local intersections are analyzed based upon peak hour directional traffic. Table 18 contains intersection cost information as determined by the Alachua County Growth Management Department for significantly impacted local roadways.

TABLE 18

**PROPORTIONATE SHARE COSTS (2010 DOLLARS)
LOCAL INTERSECTION FACILITIES**

| INTERSECTION NUMBER | INTERSECTION | PERCENT OF PROPORTIONATE SHARE | TOTAL COSTS | PROPORTIONATE SHARE COSTS |
|----------------------------|---------------------|---------------------------------------|--------------------|----------------------------------|
| NW 23rd AVENUE | | | | |
| 18 | at NW 55th Street | 16.3% | \$535,216 | \$87,498 |
| 20 | at NW 43rd Street | 13.1% | \$515,469 | \$67,544 |
| NW 53rd AVENUE | | | | |
| 31 | at NW 43rd Street | 5.0% | \$1,771,226 | \$88,333 |
| TOTAL | | | \$2,821,911 | \$243,375 |

Source: Alachua County Growth Management letter dated May 13, 2010 to the Florida Department of Community Affairs, Exhibit 2: Preliminary Opinion of Probable Cost/Proportionate Share Summary, Santa Fe Village Development of Regional Impact.

PROPORTIONATE SHARE

Section 163.3180, Florida Statutes, states that “A development of regional impact may satisfy the transportation concurrency requirements of the local government comprehensive plan, the local government concurrency management system, and s.380.06 by payment of a proportionate-share contribution for local and regionally significant traffic impacts if

1. The development of regional impact which, based on its location or mix of land uses, is designed to encourage pedestrian or other nonautomotive modes of transportation;
2. The proportionate-share contribution for local and regionally significant traffic impacts is sufficient to pay for one or more required mobility improvements that will benefit a regionally significant transportation facility;
3. The owner and developer of the development of regional impact pays or assures payment of the proportionate-share contribution; and
4. If the regionally significant transportation facility to be constructed or improved is under the maintenance authority of a governmental entity, as defined by s. 334.03(12), other than the local government with jurisdiction over the development of regional impact, the developer is required to enter into a binding and legally enforceable commitment to transfer funds to the governmental entity having maintenance authority or to otherwise assure construction or improvement of the facility.”

Section 163.3180, Florida Statutes, also states that “The proportionate-share contribution may be applied to any transportation facility to satisfy the provisions of this subsection and the local government comprehensive plan...”

Table 19 shows total proportionate share information for roadway segments and intersections as determined by the Alachua County Growth Management Department. The proportionate share as reported in Table 19 is 16.3 percent of total estimated costs.

TABLE 19
PROPORTIONATE SHARE (2010 DOLLARS)

| MODIFICATION | TOTAL ESTIMATED COSTS | SANTAFE VILLAGE DEVELOPMENT FOR REGIONAL IMPACT PROPORTIONATE SHARE |
|------------------|-----------------------|--|
| Roadway Segments | \$88,051,953 | \$15,185,817 |
| Intersections | \$20,546,755 | \$2,512,961 |
| TOTAL | \$108,598,708 | \$17,698,778 |

IMPACT ON HOUSING OF THE REGION

APPLICABLE REGIONAL GOALS/POLICIES

REGIONAL GOAL 1.1. Reduce the percentage of the region's very low-, low-, and moderate-income households spending 30.0 percent or more of their annual household income on housing.

Policy 1.1.1. Encourage the development of policies within local government comprehensive plans which provide incentives or otherwise provide for the construction of affordable housing units in a manner which results in a dispersal of affordable housing units throughout the urban areas of the local government's jurisdiction.

Policy 1.1.8. Encourage the use of the East Central Florida Housing Methodology in lieu of the Adequate Housing Standard Rule 9J-2.048, Florida Administrative Code, for the determination of adequate (affordable) housing demand and supply in the review of developments of regional impact.

APPLICANT COMMITMENTS

None.

SUMMARY OF IMPACTS

Phase I of the SantaFe Village Development of Regional Impact Substantial Deviation will not create a significant affordable housing impact. It is recommended that the following condition be added to the development order to assure that the affordable housing impacts of Phase II of the project are adequately addressed.

Prior to the initiation of Phase II, the Applicant shall re-assess the affordable housing impact of the project as per the affordable housing analysis agreement for the SantaFe Village Development of Regional Impact Substantial Deviation on March 1, 2009 entitled, "Agreement Between The North Central Florida Regional Planning Council, the Board of County Commissioners of Alachua County, Florida, and Santa Fe Healthcare, Inc. Regarding the Affordable Housing Analysis for an Application for Development Approval for the Santa Fe Healthpark Development of Regional Impact Substantial Deviation."

IMPACT DETERMINATION

The Applicant, the Council, and the County entered into an affordable housing analysis agreement for the SantaFe Village Development of Regional Impact Substantial Deviation on March 1, 2009. The agreement specifies the use of the East Central Florida Regional Planning Council affordable housing methodology while providing additional specificity which addresses methodological details for which the East Central Florida methodology is otherwise silent. The Council has reviewed the affordable housing analysis provided by the Applicant and concludes it is generally consistent with the agreement.

Table 20 matches the Phase I affordable housing demand to the available affordable housing supply. As can be seen in Table 20, the Applicant has identified an unmet need for eight very low-income households. The unmet need is below the significant unmet need threshold of 100 households. Therefore, while Phase I has an unmet need, it is not significant and does not require mitigation as per Rule 9J-2.048, Florida Administrative Code.

**TABLE 20
MATCHING AFFORDABLE HOUSING DEMAND TO SUPPLY**

| SALARY-INCOME RANGE (\$) | DEMAND | SUPPLY | UNMET NEED |
|---------------------------------|---------------|---------------|-------------------|
| Very Low Income | | | |
| 5,100 - 7,500 | 5 | 5 | 0 |
| 7,600 - 10,100 | 5 | 5 | 0 |
| 10,100 - 12,600 | 7 | 5 | 2 |
| 12,600 - 15,100 | 13 | 11 | 2 |
| 15,100 - 17,600 | 10 | 6 | 4 |
| 17,600 - 20,100 | 12 | 22 | 0 |
| 20,100 - 22,600 | 6 | 25 | 0 |
| Total, Very Low Income | 58 | 79 | 8 |
| Low Income | | | |
| 22,600 - 25,100 | 12 | 22 | 0 |
| 25,100 - 27,600 | 5 | 25 | 0 |
| 27,600 - 30,100 | 13 | 21 | 0 |
| 30,100 - 32,600 | 5 | 45 | 0 |
| 32,600 - 34,400 | 13 | 29 | 0 |
| 34,400 - 36,160 | 6 | 42 | 0 |
| Total - Low Income | 54 | 184 | 0 |
| Moderate Income | | | |
| 36,160 - 39,240 | 13 | 75 | 0 |
| 39,240 - 41,740 | 8 | 83 | 0 |
| 41,740 - 44,240 | 14 | 83 | 0 |
| 44,240 - 46,740 | 11 | 72 | 0 |
| 46,740 - 49,240 | 18 | 111 | 0 |
| 49,240 - 51,740 | 9 | 131 | 0 |
| 51,740 - 54,240 | 18 | 105 | 0 |
| Total - Moderate Income | 91 | 660 | 0 |
| Above Moderate Income | | | |
| 54,240 + | 7 | 152 | 0 |

Source: SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q24-16.

IMPACT ON THE ENVIRONMENT AND NATURAL RESOURCES OF THE REGION

AIR

APPLICABLE REGIONAL GOALS/POLICIES

None.

APPLICANT COMMITMENTS

- (15) During site preparation and construction, contractors will be required to adhere to air quality standards that include, but are not limited to, the use of the following fugitive dust control measures:
- (a) Contractors shall moisten soil or use resinous adhesives on barren areas, which areas shall include, at a minimum, all roads, parking lots and material stockpiles.
 - (b) Contractors shall use mulch liquid resinous adhesives with hydroseeding or sod on all landscape areas.
 - (c) Contractors shall promptly remove soil and other dust-generating materials deposited on paved streets by vehicular traffic, earth-moving equipment or soil erosion.
 - (d) Contractors shall utilize the best operating practices in conjunction with any burning resulting from land clearing, which may include the use of air curtain incinerators (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, Q22, page 1).

SUMMARY OF IMPACTS

Localized air pollution will be generated primarily as a result of vehicular emissions during operation of the project, and through dust created during construction activities. Air pollution associated with wind erosion during construction activity on the project site is not anticipated to have significant adverse impacts to regional air quality as a result of the Applicant's commitment to employing approved dust control measures as discussed under Applicant Commitments, above. Impacts to air quality associated with vehicle emissions are not anticipated to result in significant adverse impacts to air quality, based on the air quality analysis included in the SantaFe Village Development of Regional Impact Substantial Deviation Application for Development Approval.

Significant adverse impacts to the air quality of the region are not anticipated as a result of the construction and subsequent operation of the project. Localized air pollution will be generated primarily as a result of vehicular emissions during construction and operation of the project, and through dust created during construction activities. These sources of air pollution will be reduced through the road/intersection improvements identified in the transportation section and by the Applicant Commitments listed above to reduce fugitive dust.

IMPACT DETERMINATION

The SantaFe Village Development of Regional Impact Substantial Deviation Application for Development Approval notes that 31 intersections were identified for air quality screenings for Phase II total vehicle trips, including background traffic. The intersections were screened using the latest version of the Florida Department of Transportation screening model (COSCREEN98, revised 2004). The model contains and also automatically runs MOBILE 6.2 and CAL3QH3 2.0 to estimate worst-case carbon monoxide concentrations at receptors. If an intersection fails the COSCREEN98 screening test, detailed computer modeling must be conducted for that intersection to assess air quality. Failing the screening test only means that the intersection is a candidate for detailed computer modeling, not that there is or will be a future air quality problem. Passing the screening test means that there is almost no possibility of an air quality problem. The 1-hour standard is 35 parts per million. The 8-hour standard is 9 parts per million. Each of the 31 intersections passed the COSCREEN98 test. The modeling results are presented in Table 21, below.

TABLE 21

**ARI QUALITY MODELING RESULTS
TOTAL TRIPS - 2019**

| INTERSECTION | 1-HOUR CO CONCENTRATION (PPM) | | 8-HOUR CO CONCENTRATION (PPM) | |
|--------------------------------------|-------------------------------|-----------------|-------------------------------|-----------------|
| | AM PEAK TRAFFIC | PM PEAK TRAFFIC | AM PEAK TRAFFIC | PM PEAK TRAFFIC |
| NW 39th Ave & NW 143rd St | 5.4 | 5.0 | 3.3 | 3.0 |
| NW 39th Ave & NW 98th St | 5.8 | 7.1 | 3.5 | 4.3 |
| SR 222 & I-75 SB Ramps | 6.7 | 6.0 | 4.0 | 3.6 |
| SR 222 (NW 39th Ave) & I-75 NB Ramps | 6.8 | 8.1 | 4.1 | 4.9 |
| SR 222 & NW 92nd Ct | 9.5 | 8.5 | 5.7 | 5.1 |
| SR 222 & NW 91st St | 8.7 | 7.8 | 5.2 | 4.7 |
| SR 222 & NW 83rd St | 7.8 | 7.9 | 4.7 | 4.8 |
| SR 222 & NW 51st St | 9.0 | 8.2 | 5.4 | 4.9 |
| SR 222 & NW 43rd St | 8.3 | 8.5 | 5.0 | 5.1 |
| SR 222 & SR 121 (NW 34th St) | 7.8 | 7.7 | 4.7 | 4.6 |
| SR 222 & NW 29th Ter | 7.3 | 7.4 | 4.4 | 4.5 |
| SR 222 & NW 24th Blvd | 7.3 | 7.7 | 4.4 | 4.6 |
| SR 222 & NW 19th St | 7.7 | 7.8 | 4.6 | 4.7 |
| SR 222 & US 441 | 10.3 | 10.7 | 6.2 | 6.4 |
| NW 23rd Ave & NW 98th St | 6.3 | na | 3.8 | na |
| NW 23rd Ave & Ft Clark Blvd | 5.1 | 6.0 | 3.1 | 3.6 |
| NW 23rd Ave & NW 83rd St | 5.5 | 5.8 | 3.3 | 3.5 |
| NW 23rd Ave & NW 55th St | 6.3 | 6.7 | 3.8 | 4.0 |
| NW 23rd Ave & NW 51st St | 5.4 | 6.3 | 3.3 | 3.8 |
| NW 23rd Ave & NW 43rd Sr | 7.5 | 7.4 | 4.5 | 4.5 |
| SR 26 (Newberry Rd) & NW 143rd St | 7.5 | 7.4 | 4.5 | 4.5 |
| SR 26 & NW 98th St | 8.2 | 7.3 | 4.9 | 4.4 |
| SR 26 & Ft Clark Blvd | 6.9 | 6.7 | 4.2 | 4.1 |
| SR 26 & I-75 SB Ramps | 10.2 | 9.4 | 6.1 | 5.7 |
| SR 26 & I075 NB Ramp | 7.8 | 7.7 | 4.7 | 4.6 |
| NW 83rd St & North Rd | na | na | na | na |
| NW 83rd St & South Rd | 6.2 | na | 3.7 | na |
| NW 43rd St & NW 53rd Ave | 7.3 | 7.5 | 4.4 | 4.5 |
| NW 43rd St & NW 51st Pl | 7.6 | 7.7 | 4.6 | 4.6 |
| NW 43rd St & NW 28th Ln | 6.5 | 6.4 | 3.9 | 3.9 |
| NW 43rd St & NW 25th Pl | 7.5 | 7.2 | 4.5 | 4.3 |

Notes: ppm = Parts per Million). "na" = analysis is not necessary for intersections with approach volumes of less than 1,000 vehicles per hour.

Source: Santa Fe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, September 10, 2009, Table 22-D5.

IMPACT ON THE ENVIRONMENT AND NATURAL RESOURCES OF THE REGION

VEGETATION AND WILDLIFE

APPLICABLE REGIONAL GOALS/POLICIES

Regional Goal 4.4. Protect all listed species located in north central Florida.

Regional Policy 4.4.4. Endangered species and their habitats shall be protected.

Regional Policy 4.4.5. When a land use designation change is proposed or an increase in allowable land use density or intensity is proposed, species of special concern, and their habitat, known to exist on site shall be protected. Protection should include, but not necessarily be limited to, the following:

- a) conservation easements;
- b) on- and off-site mitigation banks;
- c) tax breaks;
- d) transferable densities;
- e) management agreements; and,
- f) agriculture and silviculture best management practices.

Regional Policy 4.4.8. Direct those land uses that are not consistent with the protection and maintenance of listed species and their habitats away from such resources.

Regional Policy 4.4.10. Detailed surveys and/or specific site assessments for listed plant and animal species, as well as habitat used by listed species shall be conducted in accordance with Rule 9J-2.041, Florida Administrative Code, for developments undergoing regional review as a Development of Regional Impact in order to evaluate the impacts of such developments on said species and habitats.

APPLICANT COMMITMENTS

- (16) In the event that gopher tortoise burrows are found within 25 feet of areas impacted by development, a gopher tortoise relocation permit will be obtained from the Florida Fish and Wildlife Conservation Commission prior to their relocation (SantaFe Village Development of Regional Impact Substantial Deviation Responses to March 9, 2008 Sufficiency Review, June 5, 2009, page 6).
- (17) The Applicant proposes to transplant specimens of the Southern lady fern to a seepage wetland located along the northeast portion of the project site which is proposed for preservation (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, Q12, page 9).

SUMMARY OF IMPACTS

Significant adverse impacts are not anticipated to occur to listed wildlife species and their habitat.

IMPACT DETERMINATION

A listed species survey identified four gopher tortoise burrows on the project site. Only one listed species may be located on the project site. No other listed species or listed species habitats were identified on the project site.

The only listed plants observed on the project site were the cinnamon fern and the Southern lady fern. Both species are located in forested wetlands which will not be developed. The Applicant proposes to transplant specimens of the Southern lady fern to a seepage wetland located along the northeast portion of the project site which is proposed for preservation. The Application for Development Approval notes that Southern lady ferns will survive in seepage wetland habitat.

IMPACT ON THE ENVIRONMENT AND NATURAL RESOURCES OF THE REGION

WETLANDS

APPLICABLE REGIONAL GOALS/POLICIES

Regional Goal 4.6. Maintain the quantity and quality of the region's surfacewater systems in recognition of their importance to the continued growth and development of the region.

APPLICANT COMMITMENTS

- (18) All wetlands located on the project site will be preserved in their entirety, including buffers ranging from an average of 50 feet for wetlands less than or equal to 0.5 acres in size to an average of 75 feet for wetlands greater than 0.5 acres in size (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, Q13 page 29).

SUMMARY OF IMPACTS

Adverse impacts to wetlands identified in the regional plan as Natural Resources of Regional Significance are not anticipated as a result of this development.

IMPACT DETERMINATION

The closest wetlands identified in the regional plan as natural resources of regional significance are Paynes Prairie State Preserve and Gum Root Swamp, which are located approximately 6.0 and 8.5 miles, respectively, from the project site. The Applicant proposes to preserve all wetlands located on the project site. Therefore, significant adverse impacts to wetlands are not anticipated as a result of the project.

IMPACT ON THE ENVIRONMENT AND NATURAL RESOURCES OF THE REGION

WATER

APPLICABLE REGIONAL GOALS/POLICIES

Regional Goal 4.3. Protect all sources of recharge to the Floridan Aquifer from all activities which would impair these functions or cause a degradation in the quality of the water being recharged in recognition of the importance of maintaining adequate supplies of high-quality groundwater for the region.

Regional Policy 4.3.6. Ensure that local comprehensive plans, Development of Regional Impacts, and requests for federal and state funds for development activities reviewed by the Council include adequate provisions for stormwater management and aquifer recharge protection in order to protect the quality and quantity of water contained in the Floridan Aquifer.

Regional Policy 4.6.13. Ensure that local government comprehensive plans, Development of Regional Impacts, and requests for federal and state funds for development activities reviewed by the Council include adequate provisions for stormwater management, including retrofit programs for known surfacewater runoff problem areas, and aquifer recharge protection in order to protect the quality and quantity of water contained in the Floridan Aquifer and surfacewater systems identified as natural resources of regional significance.

APPLICANT COMMITMENTS

- (7) A hazardous materials management plan will be prepared by the proposed hospital and associated laboratories prior to operation (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q12-2).
- (19) The project site will not contain facilities that use or store large quantities of hazardous materials that can be spilled and result in stormwater and ultimately groundwater contamination (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, Q14 page 8).

SUMMARY OF IMPACTS

Significant adverse impacts to the Floridan Aquifer are not anticipated to occur as a result of project.

IMPACT DETERMINATION

The project site is located within an Area of High Aquifer Recharge Potential to the Floridan Aquifer, based upon the St. Johns River Water Management District's map entitled, Recharge Areas of the Floridan Aquifer, Alachua County, Florida. Both the Floridan Aquifer and Areas of High Aquifer Recharge to the Floridan Aquifer are recognized in the regional plan as Natural Resources of Regional Significance.

Information included in the Application for Development Approval indicates that the top of the Floridan Aquifer on the project site is approximately 50 feet above mean sea level. Examination of well logs on the project site indicate that the top of the limestone is at approximately 42 feet below sea level. Depth to groundwater measures taken at the time of well installation indicate an average depth of 102 feet. Lithographic and groundwater depth information indicate the Floridan Aquifer is confined on the property as evidenced by clays noted in the three irrigation wells on the project site.

Stormwater runoff from the site will be directed to natural depressions, some of which have the potential to develop sinkholes. The Applicant has developed a sinkhole response plan which indicates what measures will be taken by the Applicant in the event of a sinkhole occurring on the project site. The plan calls for inspection of suspect depressional areas for the likelihood of a sinkhole collapse, notification of appropriate governmental authorities in the event of sinkhole formation, the use of soils, fill materials, concrete or cement grouting to stabilize a collapsed sinkhole, and the use of appropriate building foundation stabilization if needed. A copy of the sinkhole response plan is included in the Application for Development Approval for the Substantial Deviation.

IMPACT ON THE ENVIRONMENT AND NATURAL RESOURCES OF THE REGION

SOILS

APPLICABLE REGIONAL GOALS/POLICIES

None.

APPLICANT COMMITMENTS

- (20) Vegetative buffers or native and planted vegetation will be provided and/or retained along building site boundaries (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q15-2).
- (21) Standard erosion control devices will be utilized during construction within all graded areas. A Soil Erosion and Sediment Control Plan will be prepared consistent with local, state and federal regulations (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q15-2).
- (22) Exposed and disturbed areas will be re-vegetated and landscaped with native vegetation following construction activities (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q15-2).

SUMMARY OF IMPACTS

Significant adverse regional impacts to the soils of the area are not anticipated as a result of this project provided that the Applicant Commitments 19, 20 and 21 identified above and as further described in the Substantial Deviation Application for Development Approval are included in the local government development order.

IMPACT DETERMINATION

Most of the upland portions of the site where development will occur are covered with sandy soils which present few limitations to construction activity. The Applicant will reduce the potential for soil erosion to occur by taking the mitigative measures identified above.

IMPACT ON THE ENVIRONMENT AND NATURAL RESOURCES OF THE REGION

FLOODPLAINS

APPLICABLE REGIONAL GOALS/POLICIES

None.

APPLICANT COMMITMENTS

- (23) No structures, roadways or utilities will be constructed in the post-development 100-year flood prone area (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, Q16 page 1).

SUMMARY OF IMPACTS

Construction of the project is not expected to adversely impact on downstream development.

IMPACT DETERMINATION

The Flood Insurance Rate Map of Alachua County identifies the project site as located within Flood Zone X. Flood Zone X represents land areas located outside of a special flood hazard area. This zone corresponds to areas outside the one percent annual chance of floodplain, areas of one percent annual chance of sheet flow flooding wherever average depths are less than one foot, areas of one percent annual chance of stream flooding wherever the contributing drainage area is less than one square mile, or areas protected from the one percent annual chance flood by levees.

IMPACT ON THE ENVIRONMENT AND NATURAL RESOURCES OF THE REGION

HISTORICAL AND ARCHAEOLOGICAL SITES

APPLICABLE REGIONAL GOALS/POLICIES

APPLICANT COMMITMENTS

- (24) The Applicant will follow procedures outlined in Appendix 30-B (see “Unanticipated Discoveries of Archaeological and Historic Sites, Including Human Remains”) of the Application for Development Approval if new historical or archaeological discoveries are made during project construction (SantaFe Village Development of Regional Impact Substantial Deviation, First Sufficiency Review Response and Application for Development Approval Update, February 10, 2009, page Q30-2).

SUMMARY OF IMPACTS

Adverse impacts to historical or archaeological sites are not anticipated as a result of the project.

IMPACT DETERMINATION

No historical or archaeological sites eligible for listing on the National Registers of Historic Places are known to exist on the project site. Additionally, the Division of Historical Resources notes that development of the subject property will have no effect on known historical and/or archaeological sites.

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V

CONSISTENCY WITH THE NORTH CENTRAL FLORIDA STRATEGIC REGIONAL POLICY PLAN

The North Central Florida Strategic Regional Policy Plan is a long-range guide for the physical and economic development of a planning region which identifies regional goals and policies. It is not just a plan for the regional planning council. It is a plan for the region. The plan contains regional goals and policies designed to promote a coordinated program of regional actions directed at resolving problems identified in the trends and conditions statements contained within each strategic regional subject area. The required strategic regional subject areas are affordable housing, economic development, emergency preparedness, natural resources of regional significance, and regional transportation. The plan also identifies and addresses regional facilities and Natural Resources of Regional Significance which could be adversely affected by development activities.

Applicable regional plan goals and policies have been cited under each regional resource/facility impact evaluation section. Affected regional facilities and Natural Resources of Regional Significance are similarly cited.

The application of the goals and policies of the regional plan should result in a balancing of the beneficial and adverse impacts that might be created by a proposed development of regional impact. The application of the goals and policies of the plan should not necessarily result in a finding of inconsistency should one feature of the project be inconsistent with one regional goal or policy. Regional consistency review, therefore, examines the Substantial Deviation within the context of the five elements of the regional plan.

AFFORDABLE HOUSING

Phase I of the project does not create a significant affordable housing impact as per Rule 9J-2.048, Florida Administrative Code. Determination of the Phase II affordable housing impacts will be determined, and, should Phase II result in a significant affordable housing impact, will be mitigated by the Applicant in a manner consistent with the affordable housing analysis agreement for the SantaFe Village Development of Regional Impact Substantial Deviation on March 1, 2009 entitled, "Agreement Between The North Central Florida Regional Planning Council, the Board of County Commissioners of Alachua County, Florida, and Santa Fe Healthcare, Inc. Regarding the Affordable Housing Analysis for an Application for Development Approval for the Santa Fe Healthpark Development of Regional Impact Substantial Deviation." Therefore, the Substantial Deviation is consistent with the Affordable Housing Element of the North Central Florida Strategic Regional Policy Plan provided the Council-recommended condition addressing affordable housing is included in the local government development order.

ECONOMIC DEVELOPMENT

The Economic Development Element of the regional plan contains goals and policies to reduce the regional unemployment rate and to create more high-paying jobs in the region. The Substantial Deviation, at buildout, will have a favorable impact on the economy of the region. It is anticipated that at one year after project completion, the direct impacts of the project will result in an additional 2,244 full-time and part-time permanent jobs on the project site.

The project will also expand the tax base of Alachua County and the region. Therefore, the Substantial Deviation is consistent with the Economic Development Element of the North Central Florida Strategic Regional Policy Plan.

EMERGENCY PREPAREDNESS

The Emergency Preparedness Element of the regional plan contains goals and policies addressing coastal storms and their associated flooding as well as the management of hazardous materials releases. The project site is located outside of the riverine 100-year floodplains and areas subject to coastal flooding. The SantaFe Village Development of Regional Impact Substantial Deviation Application for Development Approval states that no industrial, hazardous, medical or other special wastes are anticipated to be generated at the project site. However, should development occur which generates such wastes, the applicable development will comply with the Alachua County Hazardous Materials Code. Therefore, the Substantial Deviation is consistent with the Emergency Preparedness Element of the North Central Florida Strategic Regional Policy Plan provided that the Applicant commitments addressing hazardous waste identified in the Recommendations section of this report are included in the local government development order.

NATURAL RESOURCES OF REGIONAL SIGNIFICANCE

Listed species and their habitats are recognized in the regional plan as Natural Resources of Regional Significance. Adverse impacts for listed plant species are not anticipated. The Applicant has committed to transplant specimens of Southern lady fern, the only listed plant species found on the project site, to a seepage wetland located along the northeastern portion of the project site which is proposed for preservation. Additionally, the project site is located within an Area of High Recharge Potential to the Floridan Aquifer, a Natural Resource of Regional Significance identified and mapped in the North Central Florida Strategic Regional Policy Plan. The Applicant has committed to a number of measures which should preclude and/or mitigate adverse impacts to the water quality and quantity of the Floridan Aquifer. Therefore, the Substantial Deviation is consistent with the Natural Resources of Regional Significance Element of the North Central Florida Strategic Regional Policy Plan provided that the Applicant commitments to vegetation and wildlife identified in the Recommendations section of this report are included in the local government development order; and the Applicant commitments to wastewater, stormwater management, wetlands, water, and soils identified in the Recommendations section of this report are included in the local government development order.

REGIONAL TRANSPORTATION

The Substantial Deviation will significantly impact the regional road network serving the northwest section of the Gainesville Urbanized Area. The Substantial Deviation is consistent with the Regional Transportation Element of the North Central Florida Strategic Regional Policy Plan provided that the Applicant commitments to transportation identified in the Recommendations section of this report are included in the local government development order.

CONCLUSION

The Substantial Deviation will be consistent with the North Central Florida Strategic Regional Policy Plan provided all the Council recommended conditions and all Applicant commitments contained in the Recommendations section of this evaluation report are included in the local government development order.

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APPENDIX A

COMMENTS FROM OTHER AGENCIES

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St. Johns River Water Management District

Kirby B. Green III, Director • David W. Fiek, Assistant Executive Director

4049 Reid Street • P.O. Box 1429 • Palatka, FL 32178-1429 • (386) 329-4500
On the Internet at floridaswater.com.

August 2, 2010

Scott R. Koons, AICP
Executive Director
North Central Florida Regional Planning Council
2009 NW 67th Place, Suite A
Gainesville, FL 32653-1603

RE: SantaFe Village Development of Regional Impact Substantial Deviation
Recommended Development Order Conditions

Dear Mr. Koons:

The St. Johns River Water Management District (SJRWMD) is in receipt of your July 26, 2010, memorandum requesting recommended development order conditions for the SantaFe Village Development of Regional Impact (SantaFe Village DRI) Substantial Deviation Application for Development Approval (ADA). SJRWMD staff recommend the following conditions for the SantaFe Village DRI amended development order:

Water supply and conservation

1. In addition to transportation infrastructure, any land use conversion shall also be based on potable water usage and the availability of potable water supply and related facilities.

(The applicant stated in the June 4, 2009, response to sufficiency comments that it agrees with this recommendation.)

2. All available lower-quality sources of water, including stormwater, surface water, and/or reclaimed water, must be distributed for use or used throughout the DRI in place of higher-quality water sources, when deemed feasible, pursuant to SJRWMD rules and applicable state law.

(The applicant indicated in the February 2009 ADA update that stormwater will be used for irrigation, where possible.)

3. No Floridan aquifer wells shall be used for irrigation. Groundwater from the surficial aquifer may only be used on a temporary basis until reclaimed water is available or on-site stormwater and surface water facilities are developed.

GOVERNING BOARD

| | | | |
|---|---|--|------------------------------------|
| W. Leonard Wood, CHAIRMAN FERNANDINA BEACH | Hersey "Herky" Huffman, SECRETARY ENTERPRISE | Hans G. Tanzler III, TREASURER JACKSONVILLE | Douglas C. Bourmique VERO BEACH |
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| | | | John A. Mikos ORLANDO |

Letter to Scott R. Koons
August 2, 2010
Page 2 of 3

4. The developer shall implement the practices described in the water conservation and water quality plan prepared by Genesis Group on June 16, 2008, that was included in the February 2009 ADA update. This plan describes water conservation practices, low impact development techniques, and best management practices to conserve water and to maintain water quality.
5. Multifamily residential units and nonresidential multi-unit structures shall use submeters for potable water.
6. Single nonresidential units shall have separate meters for potable and nonpotable water.
7. Only U.S. Environmental Protection Agency ENERGY STAR or WaterSense-labeled high-efficiency, water-conserving devices, fixtures, and appliances shall be installed in all residential and nonresidential buildings and structures.

(The February 2009 ADA update indicates that water-conserving plumbing fixtures will be used.)

8. Best management practices cited by the University of Florida in the Institute of Food and Agricultural Sciences' *A Guide to Florida-Friendly Landscaping™* shall be followed for landscape installation, irrigation, and fertilizer and pesticide applications. These best management practices include the following:
 - a. Landscape design to minimize the impacts of fertilizer applications
 - b. Preferred plant materials
 - c. Appropriate type of fertilizer to avoid the release of excess nutrients
 - d. Rate and frequency of fertilizer and pesticide applications
 - e. Watering schedules consistent with SJRWMD's landscape irrigation rule
 - f. Design and maintenance of drainage control systems
9. A water-conserving approach shall be used throughout the landscaped areas of the development. Irrigated turf grass shall not exceed 60% of the landscaped area, (except for active play areas and parks) and site-appropriate plant species shall be used in the landscaped areas. Landscaped area is defined as any pervious area within the proposed development that will be altered due to the development, exclusive of pervious area within wetlands, wetland buffers, vegetative buffers between land uses, stormwater systems, and required preservation areas. Refer to SJRWMD's *Waterwise Florida Landscapes*, available online at floridaswater.com/waterwiselandscapes; or other comparable guides.

(The applicant committed in its February 2009 ADA update to use waterwise principles in the design of landscaping and irrigation systems.)

10. Separate irrigation zones shall be required for turf and non-turf areas throughout all land uses (residential and nonresidential) to avoid irrigation of landscaped areas when irrigating the turf zone(s). Landscaped areas shall not be irrigated using a high-volume irrigation system. All irrigation systems shall use a rain sensor or soil moisture sensor (per *Florida Statutes*) to override unnecessary irrigation events.

Letter to Scott R. Koons
August 2, 2010
Page 3 of 3

11. The developer will participate in SJRWMD's Florida Water StarSM (FWS) program.

(The applicant committed to participate in the FWS program in a June 4, 2009, memorandum to SJRWMD from Genesis Group that was included in the June 4, 2009, sufficiency review response. The commercial and community design standards of the FWS program, which are currently being developed by SJRWMD, will be applicable to this DRI.)

Potable and nonpotable water infrastructure

12. A distribution system for nonpotable water (i.e., storm water, surface water, or reclaimed water) shall be installed and maintained throughout the entire project area concurrent with development of the project for all land uses in the project (residential and nonresidential). The nonpotable distribution system shall be developed in parallel to the potable water system and maintained for utilization when sufficient quantities of storm water, surface water, or reclaimed water are available for irrigation. Irrigation systems installed in the development shall be designed to accept nonpotable water.
13. The developer shall commit to the timing and funding of potable water and nonpotable water projects that are needed to support the development.

Stormwater management

14. The stormwater management system shall be designed as a stormwater reuse system, when feasible, to maximize the amount of surface water that will be available for irrigation needs throughout the development.

Please be advised that this letter does not substitute for or constitute permit review. We appreciate the opportunity to provide recommendations for the SantaFe Village DRI substantial deviation ADA. If the applicant or you have any questions, please contact SJRWMD Policy Analyst Cathleen Foerster, AICP, at (386) 329-4436 or cfoerste@sjrwmd.com.

Sincerely,



Jeff Cole, Director
Office of Communications and Governmental Affairs

JC/cf

cc: G. Brian Wheeler, Genesis Group
Ana Richmond, Florida Department of Community Affairs
Jim Quinn, Florida Department of Environmental Protection
Kraig McLane, St. Johns River Water Management District
Geoff Sample, St. Johns River Water Management District

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Florida Department of Environmental Protection

Northeast District Office
7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32256-7590

Charlie Crist
Governor

John DeMung
U.S. Governor

Michael W. Sole
Secretary

August 10, 2010

Mr. Scott Koons
Executive Director
North Central Florida Regional Planning Council
2009 NW 67 Place, Suite A
Gainesville, FL 32553-1603

RE: Santa Fe Village DRI ADA Review

Dear Mr. Koons,

The Northeast District office of the Florida Department of Environmental Protection has reviewed the Santa Fe Village DRI Report. Based on the information provided, the Department reiterates the following comments and recommendations that have been offered on this project:

Wetlands

According to the plans, all wetlands will be maintained in their natural state, without enhancement. Therefore, no ERP permit other than a stormwater authorization will be required, if there are no impacts to wetlands.

Hazardous Waste

The total volume of hazardous waste generation expected from this project is minimal, and the capacity for disposal of hazardous waste that would be generated by this project is not a significant concern for the Department's Hazardous Waste section. Contractors and transporters will also be readily available for the amount of hazardous waste generated. If the project proceeds as described, no hazardous waste permits will be required. The notification of hazardous waste activities to the DEP is required only if the amount of hazardous waste generated exceeds 100 kg/month (or 1 kg/month of acute hazardous waste).

Applicable statutes and rules for hazardous waste, used oil, and universal waste:
Sections 403.708, 403.727 and 403.751, Florida Statutes; Chapters 62-710, 62-730, 62-737 and 62-740; and Title 40 Code of Federal Regulations Parts 260 – 270, Part 273 and Part 279.

State of Florida
Department of Environmental Protection

Potable Water

A review of our records indicates that Gainesville Regional Utility (GRU) has the capacity and the resources to supply the estimated potable water demand for the complete DRI project. Based on these records, the GRU (Murphree WTP) currently has a capacity of 54 million gallons per day (MGD), and is operating at approximately 55-60% of the plant's capacity. The owner or developers of this project, in coordination with GRU, must obtain the necessary permits or approval to construct the on-site potable water distribution system at the Santa Fe Health Park, and for the service connection with the GRU Water System for potable water service in compliance with Chapter 62-555, Florida Administrative Code (F.A.C.). The approval of the construction permit(s) must be obtained from the City of Gainesville as the Department has delegated this permitting process to the City of Gainesville through an interagency agreement. The construction, operation and maintenance of the water distribution system must be in compliance with the potable water permitting guidance established in Chapter 62-555, F.A.C.: Permitting, Construction, Operation, and Maintenance of Public Water Systems. However, the Department does not anticipate any significant concerns with this part of the project.

Surface Water/Stormwater

According to information submitted, there will not be any stormwater discharges into the Santa Fe River. Wastewater will be sent to the existing Kanapaha WWTP, and will not have the potential to adversely affect the Santa Fe River.

Solid Waste

The response included a letter from the Alachua County Public Works Department's Division of Solid Waste Management that indicated it has the ability, by means of a contract with the New River Solid Waste Association, to handle the disposal of solid waste generated from the site; therefore, a solid waste permit is not required.

Tanks

The Department's response is based solely in regards to regulated Storage Tanks and Petroleum Contamination issues on-site, or in the immediate vicinity. Based on our review of several DEP tools (FIRST, STCM and Webpoint), the following comments are provided in response to the general information in Question 36 – Petroleum Storage Facilities of the DRI Application.

Section A of Question 36 discusses the presence of four (4) emergency generator storage tanks within the DRI property boundary. Two of the tanks, based on the description in Section A, are not regulated by DEP's storage tank program (AvMed Center North – 250 gallon propane tank and Hospice House – 250 gallon aboveground diesel tank). Therefore, our office is unable to provide you with any information concerning these tanks systems.

Based on the description in Section A, the other two (2) generator tanks are regulated by DEP. The 10,000 gallon underground diesel tank at Shands Hospital at Vista is registered with DEP (01/9700274). The tank system is inspected annually under a contract with the Alachua County Environmental Protection Department (ACEPD). The last inspection was conducted on August 6, 2008, and there are currently no open tank system violations on record. In addition, there have been no reports of contamination related to this tank system.

Section B of Question 36 of the DRI Application discusses the additional fuel tanks to be provided. The proposed 10,000 and 1,000 gallon diesel underground tank systems will be regulated by DEP. A 30-day prior notification of their installation must be provided to the ACEPD along with 48-hour confirmation prior to notification. In addition, the tank systems must be installed by a licensed Pollutant Storage System Contractor and the tank system components used must be approved for use in the State of Florida.

There are several other storage tank systems that appear to be just outside of the DRI property boundary. These systems are as follows: Clay Electric (01/8943113) – 8616 NW 39th Avenue; Southern Bell (01/8520319) – 9010 NW 39th Avenue; and Publix (01/9810248) – 9200 NW 39th Avenue. Based on the Department's records, none of these facilities have had petroleum discharges that require cleanup.

Groundwater

In accordance with Rule 62-520, F.A.C., the proposed development shall comply with Groundwater Requirements, where applicable. In accordance with Chapters 373.250 and 403.064, F.S., the encouragement and promotion of water conservation, and reuse of reclaimed water, as defined by the Department, are state objectives and are considered to be in the public's interest. The proposed development shall comply with local reuse programs. In order to provide optimum utilization of our limited water resources, plans should be incorporated into the proposed development's utilities infrastructure for reuse of reclaimed water in the irrigation systems, if available, or when it becomes available.

Wastewater

For the wastewater portion, this facility will connect to the Wastewater Treatment Facility (WWTF) at GRU. The key for their connection and operation will be that they must meet GRU's pre-treatment standards. The standards are stringent because the WWTF has public access reuse and falls under the UIC program (injection wells). The collection system permitting is handled by GRU, unless this project requires a 12-inch diameter or greater pipe size, then a DEP permit is required.

Office of Greenways and Trails

Trails

The Florida Department of Environmental Protection's Office of Greenways & Trails notes the importance of including bicycle/pedestrian facilities within the design plans of this project/community. Specifically, dedicated shared-use paths/trails provide the optimum setting for the safe and efficient use of non-motorized modes of transportation through master-planned residential communities and commercial centers. Trails are in high demand among homebuyers. According to the National Association of Homebuilders, trails are now the number one community amenity desired by prospective homeowners nationwide. Large-scale development projects continue to represent one of the most promising opportunities for public-private partnerships aimed at furthering Florida's expansion of an interconnected statewide system of trails.

Ecological Greenways

The Office of Greenways & Trails sees tremendous potential in partnering with developers of large scale projects to ensure true environmental integrity through the retention or creation of valuable ecological corridors (greenways). In a rapidly growing state such as Florida, the private sector is an essential component in efforts to avoid not only habitat loss, but habitat fragmentation as well. While open-space natural areas are indeed important, greenway corridors connecting such open spaces are equally important for ensuring the continued availability of many critical 'ecosystem services', from flood protection to stormwater management and treatment. In addition to these services, greenways have the potential to positively impact the economic value of the project. Specifically, studies indicate that closer proximity to greenways and conservation corridors increases property values (National Recreation and Park Association). It appears that portions of the development are within a Level 6 Ecological Greenway.

Santa Fe Village DRI ADA
August 10, 2010
Page Five

Thank you for the opportunity to review this response. If you need any further information, please contact Beth Weatherford at 904-807-3209, or via her email address at beth.weatherford@dep.state.fl.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory J. Strong". The signature is written in a cursive style with a horizontal line extending from the end.

Gregory J. Strong
District Director

GS/BW/vic

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Florida Department of Transportation

CHARLIE CRIST
GOVERNOR

2198 Edison Avenue
Jacksonville, Florida 32204-2730

STEPHANIE C. KOPELOUSOS
SECRETARY

August 18, 2010

Scott Koons, Executive Director
North Central Florida Regional Planning Council
2009 NW 67th Place
Gainesville, FL

RE: Santa Fe Village DRI, Substantial Deviation

Dear Mr. Koons:

The Florida Department of Transportation has been actively involved with the review and discussion of the Santa Fe Village DRI. Throughout the review process, the FDOT has expressed concerns that the proposed mitigation plan does not sufficiently address the impacts of this development proposal to the regional roadway network.

The Santa Fe development has stated that due to policies in the comprehensive plan in effect when the DRI application originated, that the development is part of a Transportation Concurrency Exemption for Projects Promoting Public Transportation (TCEPPPT) and that the requirements of statute F.S. 163.3180 do not apply because it refers to concurrency. The FDOT disagrees with the applicant's interpretation of statutes and in particular objects to the proposed mitigation plan.

Please note that the FDOT's review of the DRI analysis indicates that two interchanges will fail, inclusive of the proposed interchange modifications, with development of the Santa Fe Village DRI. SR 26 and I-75, as well as SR 222 and I-75 cannot accommodate projected project related traffic volumes and result in traffic stacking on the mainline of I-75. This is unacceptable and has the potential to further exasperate safety and operational conditions at these heavily utilized intersections.

The Department has found no analysis in the supporting documentation to uphold the claim that the applicant's proposed public transportation mitigation plan, as set forth in the TCEPPPT requirements, will alleviate impacts to the SIS. Furthermore, the applicant has been unwilling to work with the Department to gain our concurrence on any mitigation for the SIS facilities impacted by the Santa Fe DRI as set forth in F.S. 163.3180 (e).

www.dot.state.fl.us

The FDOT has consistently supported the use of public transportation. Our concern is the applicant is using a proportionate share cost of roadway facilities to determine their share of funding public transportation. This assessment falls short of paying for the public transportation system needed to offset the impact of the development. The applicant contends that they are exempt from concurrency and therefore exempt from the proportionate share requirements. However, the supporting documentation for this DRI analysis refers to the applicant proportionate share numerous times.

The end result is the applicant is proposing a plan that is not tied to the transit capacity required to support the TCEPPPT. Rather, the applicant is proposing to provide a proportion of the development's impacts of the DRI to a transit plan that is unsupported by technical data. Therefore, the proposed transit is what can be bought based on the roadway impact analysis (a portion of the amount) not on providing a comparable and viable public transportation project necessary to serve project trip demands.

The Alachua County Comprehensive Plan established the base policies to create the TCEPPPT. However, there has not been a corresponding analysis of data and transportation needs that indicates the level of public transit necessary to support the plan. In addition, no analysis in support of the effectiveness of the proposed mitigation for Santa Fe Village has been included with the proposed development plan. In short, the applicant has not provided any data to suggest their transit mitigation plan is sufficient to serve their needs.

A development of regional impact by nature of its size will have transportation impacts well beyond those that can be served by local transit. The Santa Fe Village DRI application provides one segment of a larger transit plan as its mitigation. The success of this plan is completely dependent upon the contributions of other developments to complete the route. At a minimum, the Santa Fe Village DRI development order must be tied to the development order of these other contributing developments to ensure a cohesive plan is in place that provides meaningful and practical connections.

The Department appreciates the opportunity to review the Santa Fe Village DRI Substantial Deviation transportation analysis and looks forward to working with the project applicant to find an acceptable resolution to the issues identified in this review. Thank you for your time and consideration in this matter and should you or the applicant have any questions or require additional information, please contact me by phone at (904) 360-5647 or by email at thomas.hill@dot.state.fl.us.

Sincerely,

A handwritten signature in black ink that reads "Thomas Hill". The signature is written in a cursive style with a small "es" at the end of the last name.

Thomas Hill
Growth Management Administrator/DRI Coordinator
Florida Department of Transportation, District 2

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North Central Florida Regional Planning Council

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