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PROD. & UTIL. FAC.

August 31, 1981

Mr. Bryan Richter
Nuclear Regulatory Commission
Siting Analysis
Mail Stop AR 5200
Washington, DC 20555

Dear Bryan:

Please find enclosed the Council's comments on the St. Lucie County Comprehensive Plan. While the comments do not specifically recommend density reductions, they do suggest that adequate public facilities should be available based on the County's desired level of growth.

If you have further questions, please call.

Sincerely,

Sincerely,

Thomas J. Baird

Thomas J. Baird
Regional Planner

TJB:lb

Enclosure

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DOCKET NUMBER 60-389
PROD. & UTIL. FAC.

March 24, 1981

The Honorable Edward G. Enns, Chairman
St. Lucie County Board of Commissioners
2300 Virginia Avenue
Fort Pierce, FL 33450

Dear Chairman Enns:

Pursuant to the requirements of the Local Government Comprehensive Planning Act of 1975, Council reviewed the proposed Growth Management Policies Plan for St. Lucie County at its regular meeting on March 20. The following comments were approved by Council for forwarding to the County Commission for consideration prior to adoption of the Plan.

1. Required Elements

- The Plan contains policies dealing with all the element areas required by the Act, but does not contain various sections that are clearly identifiable as elements. Although it contains policies in each of the required element areas, the Policy Plan document may not meet the specific requirements for most or all of the elements required by the Act. The Plan consists primarily of policy statements and implementation strategies, many of which are similar in nature to policy statements. It contains no background detail or inventory of existing conditions which would highlight the problem the Plan is designed to address and which would provide justification for the policies which are contained in the Plan. The document also lacks specificity in assessing the County's current and future needs in various areas such as water, sewer, and recreation facilities. Further, there are no detailed recommendations as to how such needs will be met.

The Plan does make reference to almost two dozen background studies which are described as being used as input to the development of the Policy Plan. Many of these documents appear to contain the type of

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background information, assessment of problems and needs, and identification of facilities required for the solution of problems and needs that are required for the various elements by the Act. However, this information does not appear in the Plan nor has it apparently been incorporated by reference into the Plan. As a result, each of the Plan's elements consist primarily of several policy statements. This approach appears to be inadequate to meet the specific requirements of the Act for many of the mandated elements.

The Plan maps for the Sunshine/95 and Indrio areas depict shaded contours around the County airport. No information is provided regarding these contours or their implication for suitable land uses around the airport. In order to protect the future integrity of the airport and assure compatible development around it, the County may wish to include detailed information regarding noise contours around the airport and develop policies designed to prevent the development of incompatible land uses within these contours.

2. Overall Requirements

- The Plan does not contain any fiscal analysis as required by the Act. Specifically, the Plan should contain fiscal proposals for any elements of the Plan that would require the expenditure of public funds for capital improvements. The fiscal proposals should contain, at a minimum, the estimated cost of the improvements, a priority ranking relative to other proposed improvements, and proposed sources of financing.

3. Regional Interests

- Two major objectives of the comprehensive planning process are to encourage coordination of the various elements of the Comprehensive Plan and to encourage coordination of planning efforts between units of government. To accomplish these, the Act requires that the several elements of the Plan be consistent with each other and that the Plan contain a specific

policy statement indicating the relationship of the proposed development of the area to the plans of adjacent areas, the region and the State. The St. Lucie County Policy Plan fails to meet both these requirements with respect to the future development of Hutchinson Island.

Throughout the region there has been increasing concern over the proper management of growth on barrier islands. This concern has focused in large part on the question of adequate facilities and access to the islands, along with a corollary issue of sufficient evacuation capability in the event of hurricanes or other disasters. Evidence of this concern by this Council has been its actions regarding the Hollingsworth project and its authorization of a barrier island study by Council staff for Indian River County.

The St. Lucie County Plan fails to recognize these concerns with respect to Hutchinson Island and to establish clear guidelines for addressing such issues. In this respect, the Plan fails to analyze the impact of the proposed development of the Island on Indian River and Martin Counties. Further, the Plan fails to adequately demonstrate that the Land Use and Traffic Circulation elements are consistent with each other with respect to development of the Island. Both of these deficiencies are related to the failure of the Plan to analyze the capacity of the existing facilities serving the Island to support existing and proposed future development.

The recommendations and strategies of the Major Trafficways Plan do not indicate any proposed additional bridge capacity to the Island. This appears to be contrary to the findings in the Plan for Hutchinson Island and the Hutchinson Island Traffic Study, both of which served as input to the Policy Plan, that additional bridge facilities will be needed. The Hutchinson Island Traffic Study went so far as to recommend no additional development should occur on the Island due to capacity restrictions. The Plan clearly fails to demonstrate that the proposed level of development on the Island is consistent with existing bridge capacity.

The Plan also fails to analyze the impact of the proposed level of development on Martin and St. Lucie Counties. There is no indication that the levels of development proposed south of the Florida Power & Light Nuclear Power Plant are consistent with the highway and bridge capacities in northern Martin County or that these facilities are adequate to evacuate the Island in the event of a hurricane or nuclear accident. Further, there is no indication that the County's planning effort for the south part of the Island has been coordinated with Martin County's plans and policies.

The Plan also fails to analyze the impacts of medium and high intensity urban uses proposed for the major portion of the Island north of the Inlet. Specifically, fears that overdevelopment of the Island will overload evacuation facilities in Indian River County in the event of a major disaster are not addressed (see attached correspondence).

St. Lucie County should modify its Plan to recognize the limitations of existing bridge access to the Island. Development of the Island should be limited to that which can be adequately accommodated by the existing facilities. If the County wishes to accommodate a higher level of development, it should adopt specific plans to provide the additional facilities necessary to support that development. Any development beyond that which can be supported by existing facilities should not be allowed until those facilities can be expanded. The County should assure that all parts of the Plan and all future actions are consistent with its general land use policies that: "The County will encourage only the types, amounts, and intensities of land development that are consistent with road capacities, available community facilities, and market demands..."

4. Consistency with Regional Plans and Policies

- The policies enumerated in the Plan are generally consistent with Council's adopted policies, with clearly enumerated exceptions as contained in this report.

The Honorable Edward G. Enns, Chairman
St. Lucie County Board of Commissioners
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- Coastal zone management policies should be addressed, with specific attention given to endangered animals, particularly the green turtle.

Attached are resolutions from Indian River County and the City of Vero Beach which were presented at the Council meeting by members of each governmental entity.

If you need additional information or have any questions, please do not hesitate to contact me.

Yours truly,



Sam Shannon
Executive Director

SS:cs

Attachments