



April 30, 2019

Mr. Brandon Creagan, Planner
City of Fort Pierce Planning and Zoning Division
100 North U.S.1
Fort Pierce, FL 34950

RE: AGGREGATE RECYCLING FACILITY – RESPONSE LETTER TO TRC COMMENTS FOR REZONING AND CONDITIONAL USE – 2432-123-0001-000-8 – TRC PROJECT #18-04000025 – **APPLICATION HAS BEEN AMENDED TO A PLANNED DEVELOPMENT DISTRICT REQUEST**

Dear Mr. Creagan,

Pursuant to comments received from staff on December 20, 2018 based on the TRC meeting on December 20 for the submittal of November 30, 2018, please accept this letter as a written response. Also, included with this letter are the revised plans, which address the comments where applicable. For your convenience we have prepared our responses in **bold italics**.

Please note the Applicant has met with the City staff and it was determined the application will be modified to request a Planned Development District (PDD) Zoning for the subject site, Ft. Pierce Aggregate Recycling Planned Development (PD). The PD application allows code language to be written specifically for the subject site. Responses to the comments received on November 30th, 2018 have been modified accordingly to reflect the proposed PDD.

PLANNING AND ZONING COMMENTS – BRANDON CREAGAN:

1. The Lighting Plan (Sheet L1) shall be revised consistent with Section 22- 60(j)(1)(a) to reflects a minimum average foot-candle of 2.0 in lieu of the 1.5 foot-candles shown.
Response: The Lighting Plan has been revised and adjusted to the new PD site plan.

2. Revise the Landscape Plan (Sheet LP-1) to be consistent with Section 22-187, with particular attention to the proposed fencing and buffering landscaping. Clarify what is meant by the “300-foot Buffer Section.”
Response: The landscape plans have been revised to reflect the proposed PDD Code Language for the project. There are three typical sections as follows:
 - A. North & South buffers – perimeter fencing landscape buffers adjacent to the same Future Land Use as follows:
 1. Eight (8) foot chain link fence on property line;

2. Ten (10) foot wide landscape buffer;
 3. Trees thirty (30) feet on center;
 4. No shrubs or opaque screening.
- B. East/Northeast buffers – perimeter fencing and landscape buffers adjacent to residential or institutional land use and zoning as follows:
1. Twenty-four (24) foot wide landscape buffer;
 2. Eight (8) foot chain link fence with a 95% opaque screen;
 3. Seven (7) foot berm with a 3:1 slope (twenty-one (21) linear feet);
 4. Twelve (12) foot tall trees thirty (30) feet on center; plus
 5. Six (6) foot tall trees fifteen (15) feet on center;
 6. Shrubs – one (1) every two (2) linear feet to create a continuous hedge;
 7. Two (2) foot side swale at property line; and
 8. One (1) foot wide flat area at top prior to the eight (8) foot chain link fence attached with 95% opaque screen.
- C. West buffer – perimeter fencing and landscape buffers adjacent to east side of access easement as follows:
1. Ten (10) foot wide landscape buffer;
 2. Twelve (12) foot chain link fence with 95% opaque screen;
 3. Three (3) foot berm with a 3:1 slope for fifteen (15) feet of screening;
 4. Trees thirty (30) feet on center;
 5. Continuous hedge.
3. The proposed modular office shall require a Temporary Use Permit which shall be renewed on a yearly basis.
Response: Acknowledged. It will be submitted for building permit as a permanent structure.
4. Provide the anticipated days and hours of operation for the proposed facility by noon on December 31, 2018.
Response: The maximum working hours for the facility will be 7 AM to 7 PM Monday through Saturday, with a typical week consisting of concrete recycling and processing occurring on Monday through Thursday 7 AM to 7 PM. One day during the week, typically Friday will be used for maintenance and repairs on the equipment. On weeks where rain prevents recycling during some portion of the week, Saturdays may be used for either recycling or maintenance.
5. Provide a dust mitigation plan for the proposed facility by noon on December 31, 2018.
Response: Dust mitigation is discussed in the Statement of Use with support documentation.
6. A Re-plat shall be required prior to Planning Board review.
Response: Acknowledged and submitted at the same time as this resubmittal.

7. The following comments need to be addressed with the Planning Department prior to Planning Board review of the proposed development:

a) The operation shall submit and have approved by the Planning Department truck routes to and from the site.

Response: The traffic report by Pinder Troutman Consulting shows the projected routing of the project traffic on Exhibit 3A. Additionally, the report analysis shows that the roadway links and intersections surrounding the site are projected to operate at the adopted level of service standards with the proposed development. Therefore, the project is in conformance with the requirement of Chapter V – Adequate Public Facilities, of the St. Lucie County Land Development Code.

b) No melting or burning of materials onsite shall be allowed.

Response: Acknowledged

c) No outdoor storage, including recycled materials, shall be allowed onsite.

Response: As stated above, the application has been amended to a PDD Zoning with code language to specifically allow for Outdoor Storage since that is the nature of an aggregate recycling facility. Please see the revised Justification Statement for further discussion on this topic.

PLANNING COMMENTS BASED ON DISCUSSION WITH STAFF – TRAFFIC COMMENTS:

1. The scale of the property seems wrong on the map exhibits. Is it exaggerated? They thought we had the wrong property but I said that the relationship is about right – coming off a road and being rectangular.

Response: The maps in the Traffic Study are Not To Scale (NTS). The size of the property is slightly exaggerated for ease of identification.

2. In the tables (1) refers generally to WPB facility on the #2 exhibits. Staff has concerns and question on whether the numbers were run from that facility or modified to the proposed facility. The size of the parcels is different and Staff feels that the numbers should reflect the potential change in intensity.

Response: The trip generation information was obtained from a traffic count at the Applicant's existing West Palm Beach Recycling facility. The West Palm Beach (WPB) Facility operates at the same intensity and type of traffic as the proposed Ft Pierce facility. The Applicant has provided the data and stated that the Ft Pierce Recycling facility will be able to process recycled materials based on the mechanical equipment onsite and at the same rate as their WPB Facility. The intensity of use, and thus the traffic to the site, is not based on the acreage of the proposed site. Part of the Ft Pierce Recycling project includes 5 acres of outdoor storage yard for contractor storage which has been accounted for with a separate trip generation rate. Therefore the acreage of the WPB site and the Ft Pierce site should not be compared in terms of traffic generated by the site. In

addition, the revised site plan adds other uses thereby decreasing the actual site for recycling activity.

3. On the #3 exhibits, when there is a YES for impacts, staff wanted to know how or what the impacts look like. What is the ramification?

Response: On Exhibits 3B and 3C, roadway links which have a “YES” for a significant impact include roads where the project trips on the directly accessed Major Road (Selvitz Road) have a 1% or more impact (% of peak hour directional service volume). Also any other Major Road within the Radius of Development Influence which has a 5% or more peak hour directional impact of project trips based on the Level of Service volume will be considered to have a significant impact. This only means that these roads with a Significant Impact must be analyzed in the Link Analysis provided on Exhibit 6. The future peak hour traffic projections for the significantly impacted links are shown on Exhibit 6. All roadway links with a significant impact meet the Level of Service standards. There are no expected Level of Service failures to the area roadways based on the proposed construction of the facility.

4. There was a question from Staff as to why the Becker Parcel was used as it is residential.

Response: The Becker Parcel is an approved residential project in the City of Ft Pierce which is considered “Committed Development.” Since the project is approved, yet unbuilt, the proposed trips from the project were added to the roadway links analysis as background growth. These approved, yet unbuilt, projects are required to be added to the traffic study per the St. Lucie County TPO TIS Methodology and Procedures and the County’s Land Development Code.

ADVISORY COMMENTS

1. The Planning Department recommends that the applicant hold a community meeting with the school and adjacent residences prior to Planning Board review.

Response: A neighborhood meeting with held on January 22, 2019, please see the justification statement for an outline of the discussion.

2. The Planning Department recommends that the existing and proposed chain link fence be replaced with a minimum 8-foot masonry wall, particularly adjacent to the school and residences.

Response: The site plan has changed, moving the recycling activity further west with a greater distance between the residential and institutional uses on the east. As distance is a better buffer to visual and audible impacts, the proposed wall has been removed and replaced with 8’ tall fencing, a 95% opaque screen and placed on a 7’ tall earth mounted berm for a total of 15’ in height.

CITY ENGINEERING – JOHN R. ANDREWS:

Developer, Owner, Engineer, Contractor and other members of the Development Team must be aware, the above recommendation is based only on the construction requirements of the engineering plans and other engineering documentation approved by this department. The Development Team shall be responsible for the compliance with other City department requirements and all approved documents, as well as Local, State and Federal regulations. The development requirements for this project may necessitate additional construction requirements that are not subject to this department's review for approval.

Response: The applicant acknowledges that they are in consultation with the other Federal, State and local government authorities having jurisdiction on the project and agree that the project will be designed and permitted in accordance with all of the applicable rules and statutes.

BUILDING DEPARTMENT:

No Comments at this time.

FPUA ELECTRIC & GAS ENGINEERING:

FPUA W/WW Engineering: Conditional use and rezoning approved:
Water and sewer are available to proposed site from a 12" water main and a 12" force main along Selvitz Road. The property would be required to install a commercial grinder station for connection to the force main. Final approval for development of site will require full plan submittal to FPUA for review and approval.

Response: The applicant acknowledges that it is proposing a commercial private grinder station and will provide the appropriate construction to connect to the existing water and sewer facilities. Prior to construction, construction plans designed, signed and sealed by a Florida licensed engineer will be submitted for review and approval to the FPUA.

ST. LUCIE COUNTY PLANNING & DEVELOPMENT SERVICES – KORI BENTON: Review Comments

1. The application doesn't appear to state the days/hours of operation for the proposed facility (Conditional Use). The City is encouraged to consider operation parameters which minimize potential impacts to adjacent residential/institutional uses, where appropriate.

Response: The hours of operation will be 7am to 7pm Monday through Saturday.

2. The Site Plan denotes a "Proposed Solid Wall/Fence along the north and east property line, however typical sections and/or height wasn't pronounced.

Response: Typical sections have been added to the landscape sheets for clarity. The proposed PDD code language is as following for the north and northeast buffers adjacent to residential or institutional land use and zoning as follows:

1. ***Twenty-four (24) foot wide landscape buffer;***

- 2. Eight (8) foot chain link fence with a 95% opaque screen;**
- 3. Seven (7) foot berm with a 3:1 slope (twenty-one (21) linear feet);**
- 4. Twelve (12) foot tall trees thirty (30) feet on center; plus**
- 5. Six (6) foot tall trees fifteen (15) feet on center;**
- 6. Shrubs – one (1) every two (2) linear feet to create a continuous hedge;**
- 7. Two (2) foot side swale at property line; and**
- 8. One (1) foot wide flat area at top prior to the eight (8) foot chain link fence attached with 95% opaque screen.**

3. How tall will aggregates and materials be stored? Is a condition of height restriction considered by Staff?

Response: The proposed PDD code is allowing a maximum of 30' for aggregate and materials to be stored.

4. What type of equipment (height, noise, positioning) is considered for the operation? Has the applicant provided detail of the process and example equipment?

Response: The statement of use has been modified to further detail the operations. Photos have been added. In addition, Staff has visited the West Palm operations to observe the dust and noise, or lack thereof, first hand. Email from Marty Sanders summarizing his findings has been attached to the revised Justification Statement.

5. Has the City engaged services from a Traffic Engineer to evaluate the traffic report, and the impacts to intersections of Selvitz & Edwards, or Glades Cut-off and Edwards. The City may consider defining a traffic routing plan for large trucks. Use of Edwards Road may be considered for avoidance.

Response: The Applicant's traffic report addresses this. See response Planning & Zoning 7.a.

6. Is the proposed "modular office" temporary? And if not, does it comply with the City's Site Plan & Design Review guidelines?

Response: The small modular office facility associated with the recycling is a permanent structure and will meet all codes.

With this resubmittal, the Applicant is proposing another permanent facility as a future Phase 2. This will comprise an office warehouse building of 15,491 s.f., 1st floor will be 3,589 s.f. of office and 8,448 s.f. of warehouse space; the 2nd floor will be 3,454 s.f. of warehouse space.

7. A neighborhood meeting is encouraged, if not already held/scheduled.

Response: A neighborhood meeting with held on January 22, 2019, please see the justification statement for an outline of the discussion.

General Note(s):

- The subject parcel appears to be non-conforming, not featuring any roadway/street frontage.
Response: Please see the attachment: Signed (Easement & Property) Document notating an access easement to Selvitz Road.
- The plan does not denote any plan(s) for refuse collection.
Response: A dumpster has been provided.
- Has the City considered how the proposed facility will be classified for Impact Fee assessment, as the “Impact Units” are exclusive from the proposed building square footage? Please coordinate with St. Lucie County to ensure appropriate fees are evaluated and applied at the time of permitting.
Response: Acknowledged.

ST. LUCIE COUNTY PUBLIC WORKS ENGINEERING – ROD REED:
Survey Review Comments

Note: The surveyor has changed with this resubmittal package.

1. Please add to the notes. “The expected use of the survey and map is commercial.
Response: Acknowledged
2. Please add to the notes. All measurements are in accordance with the United States standard, in feet.”
Response: Acknowledged
3. A reference to all bearings shown on a survey map or report must be **clearly stated, i.e., whether to “True North”; “Grid North as established by the NOS”; “Assumed North based on a bearing for a well-defined line, such as the center line of a road or right of way, etc.”; “a Deed Call for a particular line”; or “the bearing of a particular line shown upon a plat.”** References to Magnetic North should be avoided except in the cases where a comparison is necessitated by a Deed Call. **In all cases, the bearings used shall be referenced to some well-established and monumented line.** Please state if the bearings are assumed, grid etc., describe the monumentation used for the establishment of the bearing base, add the word “Florida” under survey note 2 before the words East Zone and add the verbiage “Bearing Base” above the bearing you are using for the bearing base. I can’t identify the line you are using.
Response: Acknowledged and clarified.
4. Please add the Legal Description contained in the Title Block to the space following the Type of Survey at the top of the Map and move the Property address to the Title Block. **This address is not consistent with the Property Description.**
Response: Acknowledged, an application for the permanent address has been submitted the City of Fort Pierce.

SCHOOL DISTRICT – MARTIN SANDERS

1. We recommend a wall as the appropriate buffer between the school and the project. Please provide a cross section along the property line to scale showing the buffer and the activity yard in relation to the school.

Response: With the reconfiguration of the Site Plan, moving all recycling activity westward, distance has become the effective buffer. An 8' fence is proposed with required landscape screening. There is a 500' setback with an enhanced 24' wide buffer comprising 15' non-vegetation screening and 2 times the number of trees.

2. The plans show the project discharging into an area on the School District's property. We have the following questions:
 - a. The topographic survey does not show a ditch at that location of the northeast corner of the site. Please provide topographic information showing the ditch.

Response: The survey has been updated to provide the topographic information for the ditch.

- b. Please provide the legal documentation of the outfall through the school site.

Response: The applicant's discharge is a historic route that has been in existence for at least 40 years and its existence and function has been recognized in all of the current permits for the adjacent properties.

3. What permits are required for the recycling facility from state or other federal agencies?

Response: A Florida Department of Environmental Protection Air General Permit to operate a nonmetallic mineral processing plant under the authority of Rule 62-210.310 of the Florida Administrative Code will be required for the equipment operating on this site. The equipment to be used on this site already has a permit in effect.

4. What methods will be used to prevent dust or other airborne material from impacting students on the athletic fields at Fort Pierce Central High School?

Response: The applicant will have watering truck stationed at the job site and the truck will place water on all of the travel lanes of the plant to minimize the potential of dust generation. Additionally, the processing areas will have additional dust control methods such as watering and wind curtains.

5. Has the applicant done any sediment transport study to determine the impact on the site?

Response: The applicant will utilize the Florida Department of Environmental Protections study "Evaluation of Current Design Stormwater criteria within the State of Florida" by Dr. Harvey Harper, PhD, PE and David Baker, PE. This study suggest that the standard treatments utilized will remove in excess of 90% of any potential sediment generated onsite. Additionally, the site will employ 150% of the standard treatments providing a percentage removal efficiency in the high 90s.

6. With the construction equipment working the recycling facility what is the anticipated noise levels at the property line?

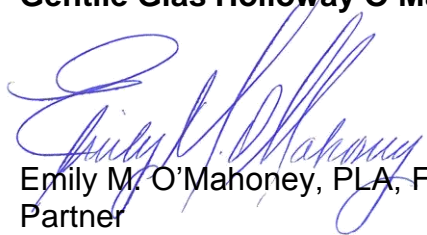
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Response: The noise levels occurring at the property line will be within the levels prescribed by Fort Pierce Ordinance 11-52.18 and the Florida State Statutes Chapter 403

Should you have any questions or concerns, please feel free to contact us at 561-575-9557 or emails at Emily@2gho.com or pat@2gho.com.

Respectfully,

Gentile Glas Holloway O'Mahoney & Associates, Inc.



Emily M. O'Mahoney, PLA, FASLA,
Partner