



July 26, 2023

Thomas A. Harowski, AICP  
Town of Howey-in-the-Hills  
101 N. Palm Ave., P.O. Box 128,  
Howey-In-The-Hills, Florida 34737

**RE: Mission Rise PUD**

Dear: Mr. Harowski

Enclosed please find responses to Staff's comments below in bold. The following items are resubmitted in response to Staff's comments:

1. Revised Conceptual Land Use Plan
2. Revised Project Narrative
3. Developer's Agreement
4. Lake County Schools APF Determination Letter

**VILLAGE MIXED USE CRITERIA:**

The Village Mixed Use classification has a set of specific criteria the development must meet. These are set out in Policy 1.1.1 and Policy 1.1.2 of the Future Land Use Element. Policy 1.1.4 includes essential information on open space and density calculation and Policy 1.2.2 sets out the minimum open space requirements. The criteria for VMU are reviewed below:

1. Residential development can occupy a maximum of 85% of the net land area of the project. (Net land area is the total land area of the project less wetlands and waterbodies. In this case the net land area is reported as 153 acres.) The maximum allowable land area to be devoted to residential development is 130 acres. Actual acreage assigned to residential use is not declared.

**RESPONSE: Residential development will occupy +/- 129 acres (84.3%) of the net land area. This is noted on Sheet 1 of the Conceptual Land Use Plan.**

2. Non-residential development must occupy 15% of the net land area but not more than 30% of the net land area. In previous development plans for the subject property, it was accepted that the property does not have reasonable commercial development potential, but other options for non-residential use are available. For example, a church site could be proposed. In one previous submittal the Town agreed to allow the land area devoted to a regional bicycle facility to count towards the non-residential component, and the current submittal appears to be offering that option again. In total the non-residential area of the plan must occupy 22.9 acres. The documentation submitted by the applicant claims a total of 23 acres of non-residential land, but a portion of the area claimed for non-residential use is ineligible. The proposal claims stormwater area (4.7 acres) and other open space (10.4 acres). Non-residentially qualified area must be for an actual use and not

for site activities that are required for engineering compliance or miscellaneous area that is not suitable for other use. The concept plan as submitted has 4.2 acres of qualified non-residential use of the 22.9 acres required. If the applicant proposes to submit the bicycle trail as a Town-wide civic and recreational use to meet the non-residential land component and this proposal is accepted as the non-residential component, the bicycle facility may not be applied to meet any of the open space or recreation requirements.

**RESPONSE: +/- 24.1 acres (15.7%) of non-residential acreage has been provided within the project. This includes the civic tract adjacent to SR 19 to be dedicated to the Town for public purpose, the amenity centers and the regional system of parks proposed along the N-S Spine Roadway. Any stormwater ponds with trails designated within these proposed park areas are not counted towards the open space calculations. The multi-use trail within the N-S Spine Roadway right-of-way will provide additional acreage towards this calculation.**

3. A minimum of 5.0% of the non-residential land area of the project needs to be devoted to public/civic buildings. The conceptual plan shows a 1.2-acre civic tract but does not specify the intended use or uses for the site. The site is located at the periphery of the project and therefore is less likely to be integrated into the project for use as a clubhouse or other resident-based facility. The site does have potential access from SR-19. The tract size meets the minimum requirement for civic area.

**RESPONSE: A +/- 1.2-acre tract for civic uses is proposed along SR 19 and is planned to be dedicated to the Town. The final use of this tract will be determined by the Town.**

4. Public recreation area is required at a minimum of 10% of the usable open space. (Open space that is not wetland or waterbodies). This requirement is calculated at a minimum of 3.0 acres. The concept plan shows public recreation at 7.2- acres, but the recreation sites are not clearly delineated on the plan as to what

areas are calculated. The plan shows four amenity areas totaling 4.6-acres, but the plan does not provide details on how the amenity areas are to be used.

**RESPONSE: The proposed public recreation areas have been designated on Sheet 1 of the Conceptual Plan. +/- 12.4 acres are proposed.**

5. Total open space is required to be a minimum of 25% of the project area. Wetland areas may account for only half of this requirement. Required open space is calculated on the gross project area or 60.8 acres in this case. Total open space is reported as 65.6 acres or 27% of the project area.

**RESPONSE: +/- 65.4 acres of open space is proposed. Please note that any areas planned as amenities, stormwater, and the regional park system counted as non-residential areas, are not included in the open space calculation.**

#### **PUD/DEVELOPMENT AGREEMENT:**

1. The applicant states that they are seeking approval of the concept plan and will provide a development agreement at a later date. The Town policy is to include a development agreement as part of the zoning action with the conceptual plan included as an exhibit to the

agreement. The Town Clerk can provide some example agreements (The Reserve and/or Watermark are useful examples.) Section 4.10.09 of the land development code lists the minimum items that need to be included in the conceptual plan package. A review of this code section notes the following deficiencies:

- 4.10.09 N Residential: The plan lacks almost all this information.
- 4.10.09 O Non-Residential: As noted above the plan falls short of the non- residential land area. If the bike trail is proposed, the trail should look for opportunities for development outside the collector road right-of-way as is currently identified.
- 4.10.09 S Phasing schedule or note there are no phases.
- 4.10.09 U Will any of the project be gated.
- 4.10.09 V Proposed architectural style of the buildings.
- 4.10.09 AA Additional information that should be provided includes:
  - Typical cross-section for the collector road
  - Typical cross-section for local roads
  - Typical cross-section for the bike trail when not included in the road right- of-way.
  - More specific designation of the amenity areas as parks, courts, buildings, etc.

Please review the code section in its entirety to verify that all items have been provided either on the plan or in supplemental materials.

**RESPONSE: Please see the revised Conceptual Land Use Plan, where additional information has been provided to address the above deficiencies as follows:**

- **Residential – Please see the details provided on Sheet 1 and 5 of the Conceptual Land Use Plan.**
- **Non-residential – Please see Sheet 1 for the proposed non-residential uses details. Additional pedestrian trails are provided throughout the proposed regional park system adjacent to the N-S Spine Road. Detailed cross sections of the multi-use path and pedestrian pathways proposed are provided on Sheet 4 of the Conceptual Land Use Plan.**
- **Phasing schedule – Please see Sheet 2 of the Conceptual Land Use Plan.**
- **Gating – The project is not planned to be gated.**
- **Architectural style – Please see Sheet 1, where the proposed architectural style of the buildings is noted.**
- **Street cross sections – Please see Sheet 4 of the Conceptual Land Use Plan.**

#### **TRAFFIC IMPACT ASSESSMENT:**

It does not appear that the traffic consultant followed the procedures for the traffic impact assessment. The town has no record of a methodology submittal prior to undertaking the TIA. Please note the following concerns:

- The TIA is structured based on the net traffic increase for the parcel from a prior development proposal. The site has no concurrency commitment and there is no approved plan. Therefore, the TIA should be based on the full traffic generation of the proposed development.

**RESPONSE: Noted. The pending TIA will be based on full traffic generation for 592 single-family detached units.**

- The impact of the proposed project needs to include other projects that have been approved including The Reserve, Like Hills, Drake Point, Watermark and Talichet Phase 2. The Town can provide traffic studies for at least some of these projects.

**RESPONSE: Noted. A methodology for the TIA was submitted to the Town for review and has been approved accounting for this information.**

- A methodology letter needs to be submitted for review and approval by the Town.

**RESPONSE: A methodology letter was submitted to the Town for review and was approved per correspondence from the Town's Consulting Planner on 7/13/2023.**

- The balance of the traffic review will be suspended pending submittal of a revised TIA.

**RESPONSE: Noted. The TIA based on the approved methodology is expected to be completed in early August and will be submitted to the Town for review.**

## **ENVIRONMENTAL CONSIDERATIONS**

1. In reviewing the proposed plan, the Town will need to consider whether the full clear zone around the eagle's nest should be preserved rather than allowing residential development within the 660-foot area.

**RESPONSE: Noted. A full clear zone is proposed within 330' of the eagle's nest location. Federal permitting guidelines allow for development within 660' of the nest with mitigation measures.**

## **CONCEPT PLAN COMMENTS**

1. Actual lot sizes are a policy decision for the Planning Board and Town Council to approve. Please note that the Town has not been approving lot widths below 75 feet across recent project submittals, and at least some members of Council will have difficulty with 75-foot-wide lots.

**RESPONSE: Noted. A mix of 55'-wide and 75'-wide lots are proposed within this PUD. 75'-wide lots are typically proposed along the periphery of the project, when adjacent to other lower density residential development. If 55'-wide lots are proposed along the periphery, additional landscaped buffers are provided to ensure compatibility with the adjoining areas.**

2. The Town Council has been seeking more space between units than typically provided with 50-foot lots. The Council appears to be supporting unit spacing of 15 to 20 feet which would yield a side yard setback of 7.5 to 10 feet. The applicant should consider this factor as well.

**RESPONSE: 55'- and 75'-wide lots are proposed. The 55'-wide lots will allow for a 7.5 side yard setback, as sought by the Town Council.**

3. The proposed bike trail will need to be extended along Number Two Road to the eastern property boundary to connect to another trail segment. This extension may be within the Number Two Road right-of-way if acceptable to Lake County.

**RESPONSE: The multi-use trail, which will act as a bike trail, has been extended along Number Two Road.**

4. The plan could take better advantage of the terrain by locating the multi-use trail outside of the collector road right-of-way when possible.

**RESPONSE: A system of parks with pedestrian trails are proposed along the length of the Collector Road which will meet the intent noted above. Please see Sheet 1 of the Conceptual Plan.**

5. Lake County will require additional right-of-way for Number Two Road and will be the permitting agency for the intersection and other external road improvements.

**RESPONSE: Noted. Right-of- way reservation has been coordinated with Lake County and demonstrated on Sheet 1 of the Conceptual Land Use Plan. As a collector roadway, 40' is needed from the centerline of the roadway, which results in reservation of approximately 7' on the Mission Rise property.**

6. The county may require additional right-of-way for Silverwood Lane.

**RESPONSE: At the 4/13/2023 DRC meeting, it was noted that Silverwood Lane is a private roadway, and no right-of-way reservation is needed.**

7. A proposed buffer along Silverwood Lane is noted. This buffer needs to be in a separate tract to prohibit direct lot access to Silverwood Lane. The full plan should provide a conceptual design for the buffer including width, proposed plantings and any fence or wall that might be proposed.

**RESPONSE: The buffer along Silverwood Lane will be provided in a separate tract. No direct lot access to Silverwood Lane is proposed. Details of all buffers are noted on Sheet 1 of the Conceptual Plan.**

8. Town code requires a buffer with a wall and landscaping along arterial and collector roads. Number Two Road will require this treatment as will the frontage on SR-19. (See Section 7.02.01.)

**RESPONSE: A 25' landscaped berm or 15' landscape buffer with 6' wall is proposed along Number Two Road and SR-19. Please see Sheet 1 of the Conceptual Plan.**

9. Access points for vehicular use are appropriately located, with the following notes.
  - Revels Road will need to be improved from the project boundary to the intersection with Orange Blossom Road. This is a public road and cannot be restricted to emergency use only.
  - The connection with The Reserve will need to be coordinated with the Hilltop Groves development plan to ensure the connection is in the proper location.
  - Can the southerly connection to Silverwood Lane be located so that it is not on the curve.
  - The Revels Road connection at SR 19 will need to be coordinated with The Reserve development plan.

**RESPONSE:** The emergency access to Orange Blossom Road to the south has been revised to remove any access restrictions. Based on input from neighbors received at the DRC meeting, it is anticipated that this connection may not be paved to deter traffic flow to the lower density residential area to the south.

Previously proposed access connections to the Reserve PUD to the east have been eliminated.

The southerly connection to Silverwood Lane at the curve has been eliminated. As Silverwood Lane is a private roadway, future connections to this roadway have been limited in the proposed Conceptual Plan.

Please see Sheet 1 of the Conceptual Plan for all the proposed updated access connections.

10. The design of the major collector needs to plan for a median and turn lanes at intersections. The requested cross-section will cover this item.

**RESPONSE:** Please see Sheet 1 of the Street Cross Sections. The N-S Spine Roadway typical cross section will allow for median and turn lanes at intersections.

11. Can the layout be modified to eliminate or limit the number of residential lots that directly access from the primary collector road? Where double frontage lots are proposed, these should be screened from the primary collector road and a separate tract provided to prevent access connections to the collector road.

**RESPONSE:** Yes, the layout has been modified to minimize lots having direct access from the N-S Spine Roadway. A 10' landscape tract has been proposed to provide screening for double frontage lots from the N-S Spine Roadway. Please see Sheet 1 of the Conceptual Plan.

12. Where a lot must access from the central collector road, the lot sizes need to be larger than 50-foot wide to minimize the number of driveways in this segment.

**RESPONSE:** No access from 55-foot lots to the N-S Spine Roadway have been proposed, please see Sheet 1 of the Conceptual Plan.

13. Will the road cross-section be wider where on-street parallel parking is proposed. What is the need for the on-street parking if the off-street parking requirements are met?

**RESPONSE:** On-street parking will be accommodated within a typical 50' right-of-way. Please see Sheet 2 of the Street Cross Sections.

14. Where 50-foot lots are proposed, access should be from an alley to avoid a continuous garage-scape street view. Paired one-way alleys may be workable.

**RESPONSE:** Any 55-foot lots that were previously shown to have access from the N-S Spine Roadway, have been designed with an alley to prevent continuous garage-scape views along this future collector roadway. Please see Sheet 1 of the Conceptual Plan.

15. Is there any intent to consider housing options such as assisted living or nursing home?

**RESPONSE: Assisted living or nursing home housing types are not proposed within this PUD.**

16. The parcel has an opportunity to create a significant park area in the open space adjacent to Wetland Area 1 and link with bicycle and pedestrian trails.

**RESPONSE: A system of parks are planned adjacent to the N-S Spine Roadway that will include a regional multimodal trail. Please see page 1 of the Conceptual Plan for the proposed layout. The open space adjacent to Wetland Area 1 will be designed as one such park area.**

17. Each neighborhood area should contain some type of appropriate park facility.

**RESPONSE: Please see Sheet 1 of the Conceptual Plan, amenity areas have been distributed across the project.**

18. The amenity areas will need to be better defined to verify compliance with VMU standards.

**RESPONSE: Please see Sheet 1 of the Conceptual Plan, where amenity details have been provided.**

19. Does the plan propose phasing of the development. If so, please locate the proposed phases.

**RESPONSE: Intended phasing of the project is noted on Sheet 2 of the Conceptual Plan.**

20. What is the intended civic use? How does the location at the SR 19 end of the project benefit the overall project?

**RESPONSE: The civic tract is planned to be dedicated to the Town. The final use of this parcel is to be determined by the Town.**

## **ENGINEERING REVIEW COMMENTS**

1. The submitted traffic analysis is just a comparison between the old PUD (400 DUs) and the proposed PUD (592 DUs). It needs to be a Tier 2 TIA per the requirements of the Lake-Sumter MPO Traffic Impact Study Methodology and Guidelines (2022). Submit a methodology for review and approval prior to proceeding with the TIA.

**RESPONSE: Noted. A traffic methodology was submitted to the Town for review and was approved per correspondence with the Town's Consulting Planner on 7/13/2023. The TIA is expected to be completed in early August and will be submitted to the Town for review.**

2. Provide a proposed Developer's Agreement for review

**RESPONSE: The proposed Developer's Agreement has been included in this resubmittal.**



3. The main N-S spine road and realigned Revels Road should be a 2 lane divided boulevard using the same design section as Hillside Grove (Reserve) shown below. It shouldn't have driveway connections or on-street parking. It should have full pedestrian accommodation including the bike trail and raised crosswalks/speed tables at key points along its length connecting the trail and sidewalks to amenity, open space, and park areas.

**RESPONSE:** Please see the proposed cross section for the N-S Spine Road on Sheet 4 of the Conceptual Land Use Plan. Please note that the proposed cross section has been designed differently than that within the Hillside Grove (The Reserve) PUD to take advantage of the Mission Rise Property's natural site conditions and create a regional multi-use trail and park system.

4. The Binding Development Concept Plan should include the typical cross section for the N-S spine road and realigned Revels Road.

**RESPONSE:** Please see the proposed cross section for the N-S Spine Road on Sheet 4 of the Conceptual Land Use Plan.

5. The project will require turn lanes (or a roundabout) on SR 19 at Revels Road and turn lanes on Number 2 Road at the entrance.

**RESPONSE:** Noted. Any transportation improvements needed to mitigate the impacts of the development will be provided by the Developer/Property Owner as determined by the traffic study.

6. The project will need to dedicate additional right-of-way to meet county standards along it's frontage of Number 2 Road.

**RESPONSE:** Right-of- way reservation has been coordinated with Lake County and demonstrated on Sheet 1 of the Conceptual Land Use Plan. As a collector roadway, 40' is needed from the centerline of the roadway, which results in reservation of approximately 7' on the Mission Rise property.

7. The developer will be responsible for extending water and sewer lines to serve the project.

**RESPONSE:** Noted.

8. The project should provide an on-site source for irrigation water.

**RESPONSE:** Noted.

9. The project will need irrigation lines separate from the potable water lines.

**RESPONSE:** Noted.

10. Show the FEMA floodprone line on the conceptual plan.

**RESPONSE:** FEMA Flood Zones have been shown on Sheet 1 of the Conceptual Plan.



Thank you in advance for your consideration of the above information. If you require further information, please do not hesitate to contact me at 607.216.2390 or [rlopes@rviplanning.com](mailto:rlopes@rviplanning.com)

Sincerely,

**RVi Planning + Landscape Architecture**



**Rhea Lopes, AICP**  
Project Manager

Enclosures

cc: Alexis Crespo, RVi Planning + Landscape Architecture  
Jason Humm, ASF TAP FL I LLC  
Jonathan Huels. Lowndes Law Group

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