Headwater Commercial Park
Preliminary Plat

The County issued comments based on a 1/6/25 (should be 2026) letter from NFPS. This letter provided two specific engineering items, one relating to 50-557(18) and one relating to 50-557(19).

Levy County Land Development Code Section 50-557 is the "Requirements for preliminary plats."
Section 50-557(18) - All floodprone areas will be shown, and shall comply with [section] 50-582 and article VI of this chapter.
Section 50-557(19) - Any subdivision in excess of five acres in size and located within a six-mile radius of the cities of Chiefland and Williston will identify and preserve sinkhole locations.
Section 50-582 – Storm Drainage.

(a) When deemed necessary by any department, commission or the board of county commissioners, a drainage design prepared by a state registered professional engineer may be required which will include detailed construction plans, supportive calculations and any additional information related or required therewith.

(b) The engineer's attention is directed to the following:
  (1) Where drainage runoff comes from outside the limits of the subdivision, it shall be included in the design.
  (2) Design storm intensity-frequency data shall be taken from the state department of transportation drainage manual for this zone or may be taken from storm intensity-frequency data published by another governmental agency if approved prior to use.
  (3) Culverts shall be designed for a ten-year storm frequency and all other facilities and structures shall be designed for a 25-year frequency.
  (4) The study shall include the effect of the subdivision on all downstream owners.
  (5) Special consideration shall be given to avoid problems from concentration on all downstream properties.

(c) Every lot platted for residential or any other use shall contain a nonfloodprone area which is adequate to accommodate all structures, drainfields and other improvements or land uses, and remain in compliance with the setbacks established by the county zoning ordinance, health department and other state agency rules, and schedule III, footnote 1 of the county zoning ordinance; unless no such lands exist on the property to be subdivided. All other floodprone areas shall be set aside for such uses, such as but not limited to public dedication as shall not be endangered by periodic or occasional inundation. All floodprone areas shall comply with article VI of this chapter. All floodprone areas shall be shown on the preliminary plat.

The applicant provided a revised Preliminary Plat and Mass grading Plans and calculations demonstrating the existing floodprone area was to be modified to proposed floodplone areas which met the requirements of all Chapter 50 codes.

The County has issued comments based on the revised Preliminary Plat and floodplain calculations dated 7/20/25 (should be 2026) in a letter from NFPS. This letter on referenced the Levy County Land Development code on one item when reiterating the need for 50-557(19) conformance. All of the other comments are not Levy County Land Development Code based, and therefore are not applicable. In order to support the County in the review of this Preliminary Plat, we offer the following draft responses:

1) The applicant proposes Stormwater Management Systems (SMS) outside the designated areas. SMS cannot be located within platted lots and must be completely contained within the common areas or SMS areas. The applicant must revise the Stormwater Management Plan (SMP) and Preliminary Plat to remove all SMS from within the proposed lots.
   RESPONSE: There is no code basis for this statement. Often stormwater facilities are located

on platted lots or other tracts and may be covered by a drainage easement. Levy County Land Development Code Section 50-582(c) requires "a nonfloodprone area which is adequate to accommodate all structures, drainfields and other improvements or land uses", which is what has been provided. Stormwater management facilities are allowed to be on platted lots.

2) The applicant has not provided soil borings for all proposed Stormwater Management System (SMS) areas. To accurately account for stormwater and calculate SMS, soil borings must be performed and accounted for, including Mean High Water Table.
RESPONSE: Maybe, however this plan is just for the floodplain calculations and recovery is N/A, therefore SMF specific borings are not required nor supported by a code basis since detailed construction plans are not necessary at this preliminary plat stage. For Preliminary Plat, the requirements are to demonstrate that there is adequate space on each lot. Detailed construction plans will be provided during the construction plan review stage, not for preliminary plat.

3) The applicant has not provided the Mean High Water Table or factored it into the stormwater calculations. Please provide accordingly.
RESPONSE: Maybe, however this plan is just for the floodplain calculations and MHWT is N/A, therefore provision is not required nor supported by a code basis. See the response to 2) above.

4) The project is located in a Special Flood Hazard Area (SFHA). The Base Flood Elevation (BFE) must be provided for all SFHAs. Please provide the calculations on how the BFE for each SFHA was derived. Please ensure to include volume compensation and recovery is included for SFHAs.
RESPONSE: The Base Flood Elevation for all SMFs was provided in the Stormwater Management Report with supporting calculations. Volume compensation and recovery are not applicable as the existing floodplain doesn't connect offsite and is being completely replaced by the provided individual floodplains. Recovery is not applicable to floodplain calculations.

5) The applicant has not factored in the proposed road in the Stormwater Management Plan (SMP), grading, or calculations. The proposed road must be included (including design of the road to ensure proper drainage) in the SMP.
RESPONSE: Incorrect. The proposed roadway is included in DA-8, see the Master Drainage Plan, Sheet C4.0. Regarding detailed design, see the response to 2) above.

6) There are no cross sections for any of the SMS. The applicant must provide cross sections for all SMS.
RESPONSE: Cross sections for the floodplain calculations are not required. The provision of cross sections is not supported by a code basis. See the response to 2) above.

7) Proposed drainage structures are not labeled. Are there any existing drainage structures that would be affected by the proposed site?
RESPONSE: No drainage structures proposed at this preliminary plat stage. Regarding detailed design, see the response to 2) above.

8) Overall site drainage patterns are unclear, recommend showing additional drainage arrows throughout the drawing.
RESPONSE: See the Master Drainage Plan and the Mass Grading Plans which clearly show the existing and proposed contours. Drainage would proceed perpendicular to the contours. No additional flow arrows will be provided at this stage. Regarding detailed design, see the response to 2) above.

9) Proposed contours seem to terminate unexpectedly, please review for tie in locations.
RESPONSE: Incorrect, contours terminate to existing contours. Regarding detailed design, see the response to 2) above.

10) Drainage structure pipe sizes are not shown, please label.
RESPONSE: No drainage structures or drainage pipes are proposed, therefore no labels are required. Regarding detailed design, see the response to 2) above.

11) Is there a reason for the separation of the "DRA-DRAW", "DRA #9", and "DRA #10" storm water facilities. If not, please consolidate.
RESPONSE: Yes, Mass grading design intent as the receiving areas do not connect. The design is apparent. Drainage area consolidation is not a review item.

12) Storm water facilities should show a freeboard of at least 1' from the maximum staging anticipated from the critical storm, please review pond tops.
RESPONSE: There is no code basis for this statement. Regarding detailed design, see the response to 2) above.

13) Stormwater facilities should have details for an emergency overflow weir on the berm to avoid blow outs in possible failures.
RESPONSE: There is no code basis for this statement. Regarding detailed design, see the response to 2) above.

14) Is the proposed design intended to treat all proposed site areas. If not a Pre-existing conditions versus Post-condition analysis should be performed to demonstrate that the runoff generated from the site development does not exceed the pre conditions.
RESPONSE: No treatment is proposed. The submitted information is a floodplain calculation to obtain preliminary plat approval. There is no code basis for this statement. Regarding detailed design, see the response to 2) above.

15) Was there a specific methodology used in the pond placement and design over the site. The amount of pond proposed seem to be an unnecessary maintenance complication after construction.
RESPONSE: The ponds were placed based on the EORs expertise. This is not a review item.

16) Report narrative does not provide adequate explanation of the existing conditions of the site. (Flood zones, existing drainage patterns...) The same issue arises concerning the proposed design conditions, specifically concerning pond types used in treatment.
RESPONSE: The is no treatment proposed as the submitted information is a floodplain calculation to achieve preliminary plat approval. There is no code basis for this statement. Regarding detailed design, see the response to 2) above.

17) Would like to see some narrative explaining the storm water design process, describe the need for multiple small ponds versus larger combined facility.
RESPONSE: There is no code basis for this statement.

18) Was there an analysis showing that the 100 year 24 hour storm event is the critical storm event. 100 year 8 hour tends to show a shorter time of duration creating a higher intensity overwhelming pipe sizes.
RESPONSE: The 100-yr, 24-hour storm event is the designated floodplain event. When detailed design for the construction plans is performed, the applicable storm events will be analyzed for peak stages, pre/post discharge, etc. Code and industry standards are to separately calculate pipe sizing based on a specific event intensity (see 50-582(b)(3)), not an entire storm event. There is no code basis for this statement. Regarding detailed design, see the response to 2) above.

19) Treatment calculation not found in the drainage documentation.
RESPONSE: Correct. Treatment is not proposed at this stage as the calculations were for floodplain review only. Regarding detailed design, see the response to 2) above.

20) The applicant must demonstrate compliance with Section 50-557(19) of the LDC which requires any subdivision in excess of five acres in size and located within a six-mile radius of the cities of Chiefland and Williston will identify and preserve sinkhole locations.
RESPONSE: This is a repeat comment and is requesting the applicant to "demonstrate compliance" which is not required by the Levy County Land Development Code. The Code requires identification and preservation. As there are no sinkholes shown, the Code basis was met. Compliance would be only required if there were sinkholes. Does Levy County Planning want a note on the preliminary plat stating no sinkholes exist?

NFPS statement: Based upon the above comments, the preliminary plat, stormwater plans, and stormwater calculations are insufficient for review. Approval of the preliminary plat is accompanied by the approval of the stormwater management plans and calculations. Thus, the stormwater plans and calculations must of sufficient detail to meet the criteria established by Suwannee River Water Management District and Chapter 50-582 of the LDC.

RESPONSE: This statement is not correct. This submittal is for the preliminary plat only. To support the preliminary plat, a proposed Mass Grading plan with supporting floodplain calculations was provided. These calculations were not submitted for construction plan review, they were submitted to demonstrate that a plan exists for revision of the isolated on-site floodplain revising the floodprone areas in order to demonstrate that the preliminary plat provides sufficient areas on each platted lot for the required infrastructure per 50-582. The County's Land Development Code does not require approval of the detailed construction plans for approval of the preliminary plat, they require conformance to the expectations of 50-582 – Storm Drainage. While Section 50-557(18) requires compliance with Section 50-582, it is specific to 50-582(c) with an understanding of the 'study' referenced in 50-582(b) during the preliminary plat stage. Compliance with Section 50-582(a) during the preliminary plat stage is to provide supportive calculations, while detailed construction plans meeting other Code and State requirements is reserved for the construction plan review. Thus, the preliminary plat is approvable since it meets all the requirements of the Levy County Land Development Code. This request does not include the approval of stormwater management plans and calculations, the floodplain analysis was provided to support the platted lot requirements in 50-582(c).