



GULF COAST CONSERVANCY

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GENERAL COMMENT

After a review of the SunWest ADA, Responses to RAI 1 through 4, and the Tampa Bay Regional Planning Agency draft Final Report, it is crystal clear that SunWest Harbourtowne is a looming environmental disaster that will permanently alter the quality of life along the Nature Coast, and not for the better. It is equally clear that there is no demand for development of any kind in Northwest Pasco. In fact, all studies show that Pasco County is currently overbuilt, and has so many permitted but not yet constructed housing units that the glut may not be removed by 2028, even if economic recovery exceeds expectations.

While SunWest Harbourtowne touts itself as a “destination resort” the paucity of amenities proposed, versus those normally associated with a destination resort, was critically noted by the members of the DRC at the rezoning hearing. Even more alarming were statements by applicant’s representative that the project may need to be “phased” and that such few amenities as are proposed may have to be delayed until housing units are in place.

On its face, SunWest Harbourtowne is a residential subdivision, and one that is aimed at a vanishing market. There is no job base that will support purchasing multi-hundred thousand dollar homes within 40 miles of the project’s location, if in fact such a job base exists anywhere in Florida. Demand for second homes – a key element of SunWest’s marketing strategy- is declining rapidly. Even worse for their marketing strategy, retirees are moving to Florida in decreasing numbers each year. Those two markets are key to SunWest economic viability, but we already have, in the form of the Little Harbor development in Ruskin, an example of development over-reach that is in all likelihood the fate of SunWest should it be permitted.

Core assumptions in the Sunwest Harbourtowne application require massive changes that will fundamentally rewrite the 2006 Comprehensive Plan. In the face of demonstrated resistance on the part of the Department of Community Affairs to such massive rewrites, Pasco County should think long and hard before forwarding such drastic changes to DCA for review. The County should also rethink its policy of deferring to state agencies such as SWFWMD, where Pasco represent 1/14th of their area of concern, and FFWCC, where Pasco is only 1/67th. of decisions that require local knowledge to determine the best course of action for the County and its residents.

AMENDMENTS TO COMPREHENSIVE PLAN ELEMENTS REQUIRED TO APPROVE SUNWEST HARBOURTOWNE

Applicable sections of the Comprehensive Plan are printed in black. **GCC comments are printed in red. Italics and underlining are used for emphasis.**

CONSERVATION ELEMENT

The proposed Harbourtowne development is to be built in the designated Coastal Marshes Ecological Planning Unit. The Habitat Study identified eight unique areas in the County warranting special consideration because of their ecological significance that were classified as Ecological Planning Units (EPUs).

OBJECTIVE CON 1.1 NATURAL RESOURCES PROTECTION

Protect natural communities including uplands and wetlands, connect natural linkages, conserve viable populations of native plants and animals, protect habitat for listed species, protect water resources and wetland systems, protect unique natural resources, enhance resource-based recreational opportunities, and expand environmental education opportunities.

The project is not in compliance. It severs natural linkages, proposes building within critical bear habit, and may impact Black Hole (Isabella) Spring on the project site - one of only eight known localities of the Coastal lowlands cave crayfish. An active Bald eagle nest is located on the site within forested habitat. Development is planned to remove all acreage of the Dry prairie, Palmetto prairie, Pine flatwoods, Sand pine, Pine-mesic oak, Xeric oak and Temperate hardwoods upland habitats.

Policy CON 1.1.2 Impacts to Listed Species

Pasco County shall require the evaluation and management and/or mitigation of impact to animals listed as endangered, threatened, or species of special concern by requiring that proposed development sites be examined for the presence of plant and animal species listed as threatened, endangered, or of special concern by the Florida Fish and Wildlife Conservation Commission (FFWCC), or the U.S. Fish and Wildlife Service (USFWS).

The evaluation and management of impact to listed species has not been completed using the cumulative data from both the park/dredge and the residential development. A wide variety of federal- or state-listed species is known to occur on the site or in the immediate vicinity, or may be expected to occur based upon the habitat types present.

Policy CON 1.1.4 Protect Existing Conservation Lands

Pasco County shall protect all existing lands designated as Conservation on the Future Land Use Map, all conservation lands listed in the Recreation and Open Space Element, and all properties acquired through the County's ELAMP program, that have not yet been designated as Conservation Land Use as required by Policy 1.1.3. Pasco County shall review proposed adjacent land developments for potential adverse impacts and shall ensure that:

d. the quality of the habitat within the conservation lands is not permitted to degrade by the adjacent use.

The adjacent conservation lands (Aripeka Heights aka Berdeaux property) will be degraded by the traffic, noise, light intrusion among other impacts due to development.

Policy CON 1.1.5 Manatee Protection

Pasco County will coordinate with the U.S. Fish and Wildlife Service, the U.S. Army Corps of Engineers, the Florida Fish and Wildlife Conservation commission, and other state and federal agencies as appropriate to protect the endangered West Indian Manatee by requiring all development

within its range to adhere to established guidelines for protection of this species. These guidelines will be specified in development order conditions.

There are no means of enforcing these guidelines.

Policy CON 1.3.14 Public Infrastructure

Pasco County shall, where feasible and practicable, locate and design roadway improvements to minimize the acreage of adversely altered, jurisdictional wetland areas, minimize direct and indirect impacts on rivers, lakes, and streams, and minimize impacts *on endangered and threatened species and species of special concern*.

The development has not been shown to minimize impact to endangered and threatened species. Proposed development will reduce the amount of available habitat, likely affect bear reproduction, foraging, and movement, and increase road mortality and instances of human/bear conflicts. Additionally, development Of the Pasco Sunwest Park will further reduce suitable habitat for the species.

Policy CON 1.3.6 Wetland Impacts

Pasco County shall limit the removal, alteration, encroachment, dredging, filling, or changes to the natural hydro period or water quality (hereinafter collectively referred to as "impacts") within Category I wetlands to cases where no other feasible and practicable alternative exists that will permit a reasonable use of the land. The protection, preservation, and continuing viability of Category I wetlands shall be the prime objective of the basis for review of all proposed impacts within these areas.

Although the applicant still tries to maintain that the Pasco County Park is not part of this project, the project references a marina and boat lift to the canal. The canal will require over 2 miles of dredging, which the developer asserts he will pay for.

Policy CON 1.5.3 Protection of Wetlands

Pasco County shall protect wetlands within ecological planning units in accordance with Conservation Objective CON 1.3. Pasco County

Impacts to wetlands on the Sunwest Harbourtowne project will result from filling to meet roadway elevation standards for hurricane evacuation, roadway and utility corridors, clearing and replacing with landscape materials along wetland edges within the golf course, and other filling necessary to raise elevations for development within the 100-year floodplain.

Policy CON 1.5.5 Impacts to Listed Species

Pasco County shall require the evaluation and management and/or mitigation of impact to animals listed as endangered, threatened, or species of special concern within ecological planning units in accordance with Policy CON 1.1.2.

The evaluation and management of impact to listed species has not been completed using the cumulative data from both the park/dredge and the residential development.

Policy CON 1.6.2 Protection of Flood Plains

Pasco County shall protect the 100-year flood plain and other natural areas which have beneficial hydrological characteristics through the Flood Damage Prevention section of the Land Development Code. Such protection shall include, but not be limited to, prohibiting new development which would have adverse impacts upon the 100-year flood plain without mitigation, other than for roadways providing access across the 100-year flood plain.

The project is a new a development and is being built within the 100-year flood plain.

Policy CON 1.6.13 Prohibit Development Activities Causing Erosion, BMP

Prohibit development activities which would cause the erosion of shoreline areas and encourage the implementation of the Best Management Practices whose aim is to prevent the loss of surface water shoreline areas from erosive activities as set forth in the Pasco County Land Development Code.

Although the applicant still tries to maintain that the Pasco County Park is not part of this project, the project references a marina and boat lift to the canal. The canal will require over 2 miles of dredging

Policy CON 1.6.8 Groundwater Protection Ordinance - Provisions

The County shall continue to enforce its Groundwater Protection Ordinance, which includes the following land use restrictions:

9. Discharges of any regulated substance or untreated stormwater into karst solution features, sinkholes, or drainage wells.
11. Excavation of waterways or drainage facilities that intersect the Floridian aquifer.
12. Excavation that removes or disturbs the confining unit located above the Floridian aquifer.

Exploration by cave divers has verified that pre-existing mining activity has penetrated through into the separation between the Surficial and Floridian aquifers.

Policy CON 1.6.16 Consideration of Groundwater Infiltration, BMP

Pasco County shall require, during the site plan review process, where feasible, consideration of the maintenance of groundwater infiltration through the use of site Best Management Practices.

Groundwater in the surficial aquifer system is essentially unconfined, connecting this water body to the mine-made lakes and the coastal waters. Rainfall permeates to the surficial aquifer as well. This surficial aquifer is also poorly separated from the Floridian aquifer, making it important to protect groundwater quality. The presence of sinkholes, siphons, springs and caves on and near the project site is evidence of this interconnection. Protection of ground and surface water quality is imperative in maintaining the health of the nearby seagrass beds, the aquatic plant communities, and the cave and spring ecosystems.

(From page 16 of the Tampa Bay Regional Final Report)

COASTAL ELEMENT

Policy COA 1.1.1 Protection of Natural Communities

Pasco County shall encourage preservation, restoration, and/or enhancement of altered natural communities in accordance with the Land Development Code.

The project does not protect natural communities. According to the Tampa Bay Regional Planning Council's final report on the DRI "development is planned to remove all acreage of the Dry prairie, Palmetto prairie, Pine flatwoods, Sand pine, Pine-mesic oak, Xeric oak and Temperate hardwoods upland habitats. Council policies address impacts to regionally-significant natural resources and state that they "shall be allowed only in cases of overriding public interest and when it is demonstrated and/or documented that the mitigation will successfully recreate the specific resource." (Page 11)

Policy COA 1.1.2 Seagrass Protection

Pasco County shall continue to implement the Seagrass Protection Zone Ordinance, which identifies or accomplishes the following:

- a. Specific sea grass protection zones,
 - b. Prohibits boating or other motorized vessel access in order to prevent damage to the seagrass,
 - c. Implements a signage program in the seagrass protection zones,
- and,

d. Establishes an education program for motorized vessels in the area. (Seagrass Protection Zone Ordinance, November 2003)

The Park & Dredge must address Seagrass protection and/or mitigation with enforceable regulations and long-term monitoring.

Policy COA 1.2.5 Limits on Wastewater Treatment Facilities

Pasco County shall limit the construction of wastewater treatment plant facilities within the Coastal High Hazard Area to expansion of existing plant facilities ...

Not only is the county prohibited from providing infrastructure to the high hazard coastal area, but there is no new construction of wastewater treatment facilities within the Coastal High Hazard Area.

OBJECTIVE COA 1.5 COASTAL CONSERVATION STRATEGY

Protect the environmental resources of the Coastal ecosystem within the Coastal Marshes Ecological Planning Unit (EPU) identified in the 2002 Habitat Study “Assessment of Measures to Protect Wildlife Habitat in Pasco County.”

The project is within an (EPU) Ecological Planning Unit and applicant has not published any habitat management plan protecting the identified environmental resources.

Policy COA 1.5.1 Protect Existing Conservation and Coastal Lands

Pasco County shall protect all existing lands designated as conservation or coastal lands on the Future Land Use Map by reviewing proposed adjacent land developments for potential adverse impacts.

This project is not in compliance. It is being developed within land that is currently designated as coastal lands on the Future Land Use Map and will have major adverse impacts.

Goal 2: Land Development shall be complementary to the natural character and existing public facility capacity of the coastal planning area.

This project is not complementary to the natural character and existing public facility capacity of the coastal planning area.

Policy COA 1.5.2 Wetland Protection

Wetlands within the Coastal ecosystem will be protected in accordance with the comprehensive conservation strategy identified in the Conservation Element.

The Sunwest development will not protect the wetlands within the Coastal ecosystem. From the Tampa Bay Regional Planning report page 15

“Impacts to wetlands on the Sunwest Harbortowne project will result from filling to meet roadway elevation Standards for hurricane evacuation, roadway and utility corridors, clearing and replacing with landscape materials along wetland edges within the golf course, and other filling necessary to raise elevations for development within the 100-year floodplain.

Policy COA 2.1.3 Prioritization of Shoreline Uses

Pasco County shall prioritize, consistent with adopted level of service standards, proposed uses according to the following order:

- a. Water-dependent uses, such as fish, shellfish, and wildlife production, recreation, ports, water-dependent industry and utilities, marinas and navigation.
- b. Water-related uses, such as certain utilities, commercials, and industrial uses.

- c. Water-enhanced used, such as certain recreational and commercial uses.
- d. Nonwater-oriented activities, e.g. residential uses, with no alteration of coastal resources.

Residential uses are the lowest priority and the project will alter coastal resources

Policy COA 2.1.4 Criteria for Marinas Adjacent to Conservation Areas, Preservation Areas or Environmentally Sensitive Areas

Pasco County shall base development approval for marinas adjacent to identified conservation areas, preservation areas, or environmentally sensitive areas upon criteria which shall include:

a. Preparation prior to development construction of an appropriate environmental impact statement identifying potential adverse impacts upon and mitigative measures for water quality, natural vegetation, wildlife and wildlife habitat, soils and shorelines, and air quality.

The full cumulative impact of the combined 2 projects of the residential development and park/dredge has not been studied.

b. Identification of adequate mitigation measures to be implemented to eliminate or significantly reduce potential adverse environmental impacts of marina development incorporated as conditions of development approval.

This issue has not been addressed bases on cumulative impacts.

c. Preparation prior to development of an appropriate monitoring plan to be implemented during and after development for the purpose of monitoring adverse impacts upon water quality, natural vegetation, wildlife and wildlife habitat, soils and shorelines, and air quality.

A monitoring plan for the full cumulative impact of the combined 2 projects of the residential development and park/dredge has not been developed.

e. Limitation of certain marina uses which 1) might pose a significant adverse impact to the conservation area, preservation area, or environmentally sensitive area adjacent to the proposed project; or 2) create a nuisance to residential areas adjacent to such conservation areas, preservation areas, or environmentally sensitive areas.

No plans for enforcement of use limitations have been submitted.

f. Preparation of appropriate boating management plan demonstrating adequate access and protection of public safety, including existing boat traffic.

A boating management plan for the full cumulative impact of the combined 2 projects of the residential development and park/dredge has not been developed.

Policy COA 2.1.5 Development Conditions for Marinas

Pasco County shall consider, at a minimum, the following conditions for the siting of marinas:

- e. Location in areas which require minimal submerged land alteration

The project is not in compliance, the accompanying dredge/Park project will alter submerged land.

i. Location outside of areas designated as Outstanding Florida Waters or areas approved as shellfish harvesting waters.

The planned channel & marina are within 2 miles of the Pasco-Hernando county line, which is the southern edge of the approved scalloping zone. Without the impact from the proposed canal dredge, shellfish habitat will likely expand farther south along the Pasco coast

OBJECTIVE COA 2.2 DEVELOPMENT LIMITATIONS IN THE COASTAL HIGH HAZARD AREA

Policy COA 2.2.1 Coastal High Hazard Area

Pasco County shall continue to rely upon the Coastal High Hazard Area as designated in the Future Land Use Map Series (*Map 2-2: Coastal High Hazard Areas and Evacuation Routes*) as the mechanism to limit residential densities through currently adopted future land use designations and limiting future re-zoning actions to the lowest allowable urban residential densities within the adopted future land use designation for single family detached residential uses or to an MPUD for multi-family residential uses as permitted within the adopted future land use designation based upon the standards and guidelines of Policy FLU 1.3.3.

Zoning changes from a Coastal Land density of 1d/u per 40 gross acres to a MPUD is not limiting future re-zoning actions to the lowest allowable urban residential densities.

Policy COA 2.2.2 Coastal High Hazard Area: Infrastructure Limitations

Pasco County shall not provide nor allow either directly or indirectly infrastructure to be provided to serve the private development of offshore islands, coastal swamps, marshlands, and beaches. Pasco County shall prohibit County investments for public infrastructure within the Coastal High Hazard Area except for public recreation, natural and historic resource restoration or enhancement, or other facilities deemed necessary to serve existing development or due to overriding public interest as determined by the Board of County Commissioners.

This project does not serve an overriding public interest. Homeowner's insurance in Florida has become prohibitively expensive due to property vulnerability to weather events. Conversion of coastal land and adjacent uplands to private use also violates this provision.

Policy COA 3.1 Hurricane Evacuation: Maintain or reduce hurricane evacuation clearance times of 18 hours for an average response scenario within the hurricane vulnerability area.

100% of this project is in hurricane evacuation Level A (category 1 hurricane). This time frame is barely achievable if only Pasco evacuates. If Pinellas and Hillsborough evacuate simultaneously, the time would increase dramatically.

Policy COA 2.4.1 Prohibit Expenditures of County Funds for New Development in Coastal High Hazard Area

Pasco County shall prohibit the expenditure of County funds for the construction of facilities within the Coastal High Hazard Area which would open up new areas for development. This does not include public recreation, natural and historic resource restoration or enhancement, or other facilities deemed necessary to serve existing development or which are needed due to overriding public interest as determined by the Board of County Commissioners.

This policy prohibits the county from providing any physical infrastructure to this entire project area. It is a new project. It is a private project. Providing infrastructure would open up what's left of Pasco's coast to development. This policy extends to prohibition of service to infrastructure as well, for example, maintenance of any roads, stormwater structures, street lighting, buildings, etc. would constitute

spending County funds. Also, providing continuous water and/or sewer service to the project is also prohibited as there are costs associated with providing that service and it does not serve an overriding public interest.

Policy COA 3.2.7 Minimize Disturbance of Natural Resources

Pasco County shall continue to minimize the disturbance of natural resources which provide shoreline stabilization and protect landward areas from natural hazards through the Flood Damage Prevention Ordinance and the development review process.

The project will disturb natural resources. Locating homes adjacent to the inter-tidal zone will require alteration of natural resources that provide shoreline stabilization.

Policy COA 4.1.3 Protection of Historic and Archeological Resources Significant historical and archaeological sites, including but not limited to sites on the Florida Master Site file, shall be protected by implementing the following:

1. After identification of historical and archaeological resources, the County shall place such buildings, structures, sites, districts and zones on the Pasco County Register of Historical and Archaeological Resources as such Register is established by resolution.
2. For archaeological resources not listed on the Pasco County Register, as part of all site plan evaluations, development shall comply with State law and guidelines for the investigation of Archaeological sites and the lawful disposition of all artifacts found.
3. The County shall prevent the destruction or alteration of historic and archaeological resources listed on the Pasco County Register, the Florida Master Site File and the National Register of Historic Places by cross checking all requests for remodeling or demolition permits against these files. Where such resources are listed on the Pasco County Register, a certificate of appropriateness shall be required prior to such permit being granted. For resources listed on either the Florida or National lists, the appropriate procedures shall be followed.

The project will have a negative impact on the potentially significant Scheer Village archaeological site. Preservation, by redesign to avoid, is the preferred option.

RECREATION AND OPEN SPACE ELEMENT

REC Update 11-18-06

There is an interest in expanding access to coastal areas. However, due to the fact that the coastline is characterized by coastal wetlands and marshes, which are strictly protected, the provision of new sandy beaches is neither practical nor feasible. Consequently, coastal access is focused on areas that are left in its natural state with public access via trails/boardwalks. These areas maintain the integrity and functionality of the coastal wetlands/marshes as well as providing access for the public to observe the wide variety of wildlife and fish that utilize these coastal habitats. The primary opportunity to enhance coastal access is through coordination with the Florida Department of Environmental Protection and the ongoing development of the Werner-Boyce Salt Springs State Park, enhanced access to Anclote Key State Preserve, and the potential acquisition of the property in Holiday through Florida Communities Trust Florida Forever Program.

OBJECTIVE REC 1.4 PRIVATE DEVELOPMENT

Maximize private development assistance in providing parks and recreational opportunities to meet current and future parks and recreational demands.

SWFWMD land swap results in loss of 90 acre public nature park already developed with fishing lake, trail and parking lot with no mitigation.

Policy REC 1.4.1 Requirements for Adequate Land for Parks

Pasco County shall continue to implement Land Development Regulations that require private developers to provide land, construct, and maintain neighborhood parks as part of new developments or redevelopment activities that contain 25 dwelling units or more. In addition, the County shall consider expanding the requirement to include community parks.

The SunWest Park is not part of the project, but part of the settlement Pasco accepted in the mine bankruptcy agreement. It should not be considered in the decision to require public park space from the development. The developer should be required to replace the public access nature park lost by the land swap.

Policy REC 1.9.1 Preservation of Open Space

Pasco County shall continue to define and preserve as open space areas those areas designated as CON (Conservation Lands) on the Future Land Use Map, jurisdictional wetlands, including any associated buffers which may be established; significant habitats of threatened and endangered species; and any species management areas for species of special concern. Where appropriate, utilize such areas for passive recreation.

The project is not in compliance as it is not preserving areas designated as Con on the future land use map.

FUTURE LAND USE ELEMENT

OBJECTIVE FLU 1.2 NATURAL, HISTORIC, ARCHAEOLOGICAL AND CULTURAL RESOURCES

Pursuant to Article II, Section 7 of the Constitution of the State of Florida, the County shall ensure that natural, historic, archaeological and cultural resources are protected for the enjoyment of all citizens through provisions of the Pasco County Land Development Code and the Pasco County Comprehensive Plan policies. These resources shall expressly include, but not necessarily be limited to, those resources that meet one or more of the following standards:

c. Formally designated historic communities which have been identified as having a special character.

The historic fishing village of Aripeka, formally so designated by the Pasco Historical Commission and Board of County Commissioners in October 1993, will have its special character adversely affected if an additional 2500 homes, offices, and retail stores are juxtaposed to a community with a permanent population of approximately 400.

Policy FLU 1.2.1 Comprehensive Strategy for Conservation

Pasco County shall implement a regional strategy for the protection of environmentally sensitive lands that includes the following techniques:

- a. Regulations that protect listed species, Critical Linkages and wetlands;
- e. Conservation land use designations.

Sunwest development is being built in land that has a conservation land use designation. It is severing natural linkages, building within critical bear habit, and Black Hole (Isabella Spring) on the project site is one of only eight known localities of the Coastal lowlands cave crayfish. An active Bald eagle nest is located on the site within forested habitat. Development is planned to remove all acreage of the Dry prairie, Palmetto prairie, Pine flatwoods, Sand pine, Pine-mesic oak, Xeric oak and temperate hardwoods upland habitats.

Policy FLU 1.2.5 Flood Plain Protection

Pasco County shall continue to require the identification of the 100-year floodplain on any proposed development site prior to the issuance of a development order. Development shall be limited within the 100-year floodplain in order to minimize property damage from a 100-year storm event. These restrictions and limitations shall include:

b. Restrict land filling and grade changes where such activity will cause erosion or inhibit flood waters;

Development is not being limited and land filing will be allowed to meet roadway elevation standards for hurricane evacuation, roadway and utility corridors, clearing and replacing with landscape materials along wetland edges within the golf course, and other filling necessary to raise elevations for development within the 100-year floodplain.

Policy FLU 1.3.1 Coastal High Hazard Area: Development Limitations

Pasco County shall continue to rely upon the Coastal High Hazard Area as designated in the Future Land Use Map Series (*Map 2-2: Coastal High Hazard Area and Evacuation Routes*) as the mechanism to limit residential densities through currently adopted future land use designations and limiting future re-zoning actions to the lowest allowable urban residential densities within the adopted future land use designation for single family detached residential uses or to an MPUD for multi-family residential uses as permitted within the adopted future land use designation based upon the standards and guidelines of Policy FLU 1.3.3.

Sunwest is being built in the Coastal High Hazard Area and is not limiting residential densities. Rather they propose to transfer high density residential into the velocity (V) zone shown of the FEMA FIRM map.

Policy FLU 1.3.2 Coastal High Hazard Area: Infrastructure Limitations

Pasco County shall not provide nor allow either directly or indirectly infrastructure to be provided to serve the private development of offshore islands, coastal swamps, marshlands, and beaches. Pasco County shall prohibit County investments for public infrastructure within the Coastal High Hazard Area except for public recreation, natural and historic resource restoration or enhancement, or other facilities deemed necessary to serve existing development or due to overriding public interest as determined by the Board of County Commissioners.

This project does not serve an overriding public interest. Homeowner's insurance in Florida has become prohibitively expensive due to property vulnerability to weather events. Another problem is the loss of coastal land and uplands to private ownership with no public recreation, natural and historic resource mitigation, restoration or enhancement.

HOUSING ELEMENT

Policy HSG 1.1.2 Comprehensive Plan Amendments

Comprehensive Plan amendment requests for additional residential acreage and/or density increases must be supported by residential growth trends and goals, objectives and policies of the Future Land Use Element.

The Sunwest project is not in compliance since the request for increased density is not supported by local growth trends. To the contrary, both Pasco County and the Nature Coast as a whole both have excessive inventory of unsold homes and have many more homes permitted but not yet built.

Policy HSG 1.1.3 Encourage Residential Infill in Urban Areas

Pasco County shall continue to encourage infill residential development on vacant land within established subdivisions where supporting infrastructures such as water and sewer lines and

transportation systems are already in place, subject to compliance with the goals, objectives and policies of this Comprehensive Plan,

Sunwest is not in compliance, as supporting infrastructures are not in place.

TRANSPORTATION ELEMENT

OBJECTIVE TRA 3.4 NATURAL RESOURCE CONSIDERATIONS

Ensure that all transportation improvements are conducted in a manner which minimizes adverse impacts on important natural resources.

Policy TRA 3.4.3 Roadway Improvements to Minimize the Acreage of Adversely Altered Wetland

Pasco County shall, where feasible and practical, locate and design roadway improvements to minimize the acreage of adversely altered jurisdictional wetland areas; minimize direct and indirect impacts on rivers, lakes, and streams; and minimize adverse impacts on **endangered and threatened species and on species of special concern**.

Impacts to wetlands on the Sunwest Harbourtowne project will result from filling to meet roadway elevation standards for hurricane evacuation, roadway and utility corridors, clearing and replacing with landscape materials along wetland edges within the golf course, and other filling necessary to raise elevations for development within the 100-year floodplain.

OBJECTIVE TRA 3.6 WETLANDS PROTECTION (Consistent with CON OBJ. 1.3)

Pasco County shall protect wetlands and the natural function of wetlands by implementing the following policy:

Policy TRA 3.6.1 Public Infrastructure (Consistent with CON 1.3.14)

Pasco County shall, where feasible and practicable, locate and design roadway improvements to minimize the acreage of adversely altered, jurisdictional wetland areas, minimize direct and indirect impacts on rivers, lakes, and streams, and minimize impacts on endangered and **threatened species and species of special concern**.

Sunwest will impact wetlands, coastal lands, endangered and **threatened species and species of special concern**. A cumulative impact analysis has not been conducted on the combined impacts of the development and park/dredge.

PUBLIC FACILITIES ELEMENT

Policy DGR 5.1.19 Cumulative Impacts Analysis

By 2009, the County shall assess the effectiveness of a cumulative impacts analysis for stormwater management within the development review process.

A cumulative impact analysis has not been conducted on the combined impacts of the development and park/dredge.

Policy DGR 5.5.2 Protection of Natural Drainage Features for Stormwater Management

Pasco County shall protect natural-drainage features, such as streams, lakes, wetlands, and estuaries, and the natural function of these features for conveyance, storage, and treatment of stormwater run-off.

Approximately 85 percent of the Sunwest Harbourtowne site is within the 100-year floodplain. The entire site is within the Coastal High Hazard Area, susceptible to coastal storm surge and flooding. It is unclear how development of the site will occur while providing compensation for the loss of 100-year flood storage capacity, as the entire site will have to be elevated to accommodate the level of development planned, natural ground level is currently little higher than sea level, and the groundwater table is essentially the same as, or higher, than sea level.

Policy DGR 6.3.3 Prohibition on Drainage of Wetlands

Pasco County shall prohibit the drainage of wetlands and submerged lands unless permitted by the appropriate agencies (i.e., the Southwest Florida Water Management District, and the Florida Department of Environmental Protection).

Southwest Florida Water Management District is a co-applicant on the DRI, how can they also permit for it?

Policy DGR 6.3.4 Preservation of Wetland and Transitional Vegetation

Pasco County shall preserve wetland and transitional vegetation located in flood plain, buffer zones, Critical Linkages and native habitat areas as defined by the Conservation and Coastal Zone Elements.

The project is planned within the Coastal zone. Impacts to wetlands on the Sunwest Harbourtowne project will result from filling to meet roadway elevation standards for hurricane evacuation, roadway and utility corridors, clearing and replacing with landscape materials along wetland edges within the golf course, and other filling necessary to raise elevations for development within the 100-year floodplain.

Policy DGR 6.3.5 Prohibition on Altering Natural Watercourses

Pasco County shall prohibit the widening, straightening, stabilizing, or otherwise altering of natural watercourses except in cases of overriding public interest.

Both the existing drainage canal and proposed channel are currently in the process of being permitted to be dredged and extended over 2.5 miles. The waterway as it exists is adequate to support the planned public use. Additional waterway alteration is proposed for the sole purpose of accommodating the proposed SunWest Harbourtowne development.

ECONOMIC ELEMENT

Goal 1: Provide an Economic Development Program and Strategy that:

- Focuses on the retention, expansion, and relocation of primary and target businesses; and
- Is designed to encourage business growth to better distribute the tax burden from residential uses to primary and target business uses.

Policy ED 1.2.2 Target Businesses Incentive Program

b. Exclude hotel/motel development and to exclude a regional mall or factory outlet mall from the list of qualified businesses;

A hotel/motel is currently planned for the development.

Employment The applicant estimates that, upon completion, the Sunwest Harbourtowne commercial, office, retail, golf, and marina components will create approximately 775 permanent jobs consisting of

418 in retail trades, 200 in office employment, 125 in hotel employment, and 32 jobs between the golf course and marina.

These professions are not listed on the Pasco County Economic Development list of targeted industry. All pay little more than minimum wage.