

6. Mr. Dorworth Letter

June 6, 2018

Tina Williamson, AICP
Development Services
Director of Development Services
1101 E. First Street
Sanford, FL 32771-1468

Ms. Williamson,

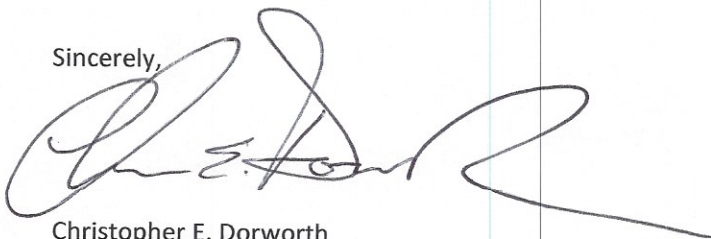
We are in receipt of, and have reviewed, the River Cross- Text Amendment LSFLUA Project # 18-20500016 and PD Rezone Comment Document dated May 24, 2018.

We anticipated a technical document that included a thoughtful review, demonstrating objectivity and providing constructive comments that would provide direction as we advance the planning process for this important project. To our disappointment, it was clear that the report was reverse-engineered to support perceived political opposition to the plan rather than a good faith review of the proposal. This estimation was solidified at the Development Review Committee (DRC) meeting held on May 30, 2018 when we were given just 25 minutes, five more than were originally scheduled, to discuss 62 comments and 39 pages of staff/consultant opinions. We were provided no clear answers at DRC with respect to the few staff comments we had time to answer, and are confident we will not be provided with even a hypothetical path to success from staff.

This Comment Document does not represent an objective review of the proposed River Cross plan and components. The Rural Boundary Charter Language is devoid of any standards for amending the boundary and the subsequent standards developed by the County lack objectivity. Based on the staff report and comment memoranda, it is clear that many of the criteria within the Comprehensive Plan for amending the Rural Boundary are unachievable for any applicant. Though we recognize that the County lacks precedent for dealing with such Rural Boundary amendment requests, it was clear from the staff report that any codified criteria are likely to change during our review and approval process. For example, the "Locational Analysis of Amendments" includes a standard that reads *"Availability of facilities and services, and the orderly, efficient and cost-effective provision of service, given that the level of service for potable water and sanitary sewer in the Rural Area is on-site service, and that availability of public school capacity in the Rural Area is limited."* Despite an initial letter dated April 13, 2018 which states that the County has *"adequate unreserved capacity to serve"*, staff has since backtracked from this position and increased their standard for "availability" as it relates to River Cross. This is merely one example of many instances where staff demonstrates acrobatic-like flexibility in the interpretation of County standards and Policies in an attempt to oppose the River Cross project.

In conclusion, we lack confidence in staff's willingness to provide a fair and objective review of our applications. A subsequent response to the Comment Document would be futile and we therefore request to be scheduled for consideration at the July meeting of the Planning and Zoning Commission.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'Chris E. Dorworth', with a long horizontal flourish extending to the right.

Christopher E. Dorworth
River Cross Owner and Founder