

To: Sherry Willette, Zoning Coordinator, City of North Port  
 From: Sabal Trace Developments Partners, LLC ("Owner")  
 Re: Request for Brownfield Designation Pursuant to 376.80, F.S.  
 Date: September 14, 2020

Owner requests that the City of North Port designate Parcel 0999001010, located at 5456 Greenwood Ave., North Port, FL, 34287 (the "Property"), depicted below, as a "Brownfield Area" pursuant to the Florida Brownfields Redevelopment Act, 376.77, F.S. Owner is the owner of the Property. For the purposes of this designation, Owner requests that the Property be referred to as the "Sabal Trace Redevelopment Area"

The Property, comprising approximately 207 acres, is the location of the former Sabal Trace Golf & Country Club. The golf course opened around 1970, but has not operated in a number of years and is vacant. The Property is zoned "Planned Community Development (PCD)" with a future land use category of "Activity Center." The redevelopment plan (see below) includes the construction of approximately 500 residential homes on the residential tract, and redevelopment of the commercial tracts for a variety of permitted uses, including an assisted living facility, self-storage facility and other permitted retail/commercial uses. The total capital expenditure for the redevelopment is anticipated to exceed \$100M.



In support of the request for designation, Owner proposes to satisfy the criteria for designation set forth in 376.80(2)(c), F.S., as described below. For convenience, the statutory requirements for designation are bolded. The explanation of how each criterion will be met follow the statutory section in regular font.

**“376.80(2)(c) Brownfield area designation proposed by persons other than a governmental entity.—For designation of a brownfield area that is proposed by a person other than the local government, the local government with jurisdiction over the proposed brownfield area shall provide notice and adopt a resolution to designate the brownfield area pursuant to paragraph (1)(c) if, at the public hearing to adopt the resolution, the person establishes all of the following:”**

**“1. A person who owns or controls a potential brownfield site is requesting the designation and has agreed to rehabilitate and redevelop the brownfield site.”**

Response: Owner is the owner of the Property and agrees to rehabilitate and redevelop the Property. Following designation by the City, Owner will enter into a Brownfield Site Rehabilitation Agreement (“BSRA”) with the Department of Environmental Protection (“FDEP”) to complete site cleanup in conjunction with the redevelopment plan.

Site impacts include a combination of naturally occurring arsenic in site soils and groundwater, which is common based on the soil lithologies in this area of Florida, as well as impacts from arsenic containing pesticides used in golf course maintenance activities. Site assessment is proceeding under the direction of the FDEP. Major reports submitted to date include:

- Arsenic Contamination Investigation Report, prepared by A·C·T Environmental & Infrastructure, Inc. (“ACT”) dated March 19, 2019
- Site Assessment Report, prepared by ACT, dated Sept. 19, 2019; and
- Site Assessment Report Addendum, prepared by ACT, dated January 28, 2020

Copies of the above reports, as well as related documentation and correspondence is available through FDEP’s document portal link for the facility:

[https://prodenv.dep.state.fl.us/DepNexus/public/electronic-documents/COM\\_377198/facility!search](https://prodenv.dep.state.fl.us/DepNexus/public/electronic-documents/COM_377198/facility!search)

**“2. The rehabilitation and redevelopment of the proposed brownfield site will result in economic productivity of the area, along with the creation of at least 5 new permanent jobs at the brownfield site that are full-time equivalent positions not associated with the implementation of the brownfield site rehabilitation agreement and that are not associated with redevelopment project demolition or construction activities pursuant to the redevelopment of the proposed brownfield site or area....”**

Response: The residential redevelopment portion of the project (approximately 500 homes) is anticipated to create: 5-8 permanent jobs (including maintenance and landscape services staff, HOA and CDD management staff). The commercial redevelopment portion of the project will include a 300 bed assisted living facility (ALF) anticipated to generate 15-20 permanent jobs. The remaining commercial tracts will include a mixture of retail, office and self-storage, anticipated to include 6-8 building pads at 5 jobs each; approximately 30-40 permanent jobs. Upon complete project buildout, the total conservative anticipated job creation is 50-68. These jobs will be a mix of professional (salaried) and labor (hourly) wage earners.

**3. The redevelopment of the proposed brownfield site is consistent with the local comprehensive plan and is a permissible use under the applicable local land development regulations.**

Response: The Property is zoned “Planned Community Development (PCD)” with a future land use category of “Activity Center.” The redevelopment of the Property is a permitted use under the applicable local land development regulations.

**4. Notice of the proposed rehabilitation of the brownfield area has been provided to neighbors and nearby residents of the proposed area to be designated pursuant to paragraph (1)(c), and the person proposing the area for designation has afforded to those receiving notice the opportunity for comments and suggestions about rehabilitation. Notice pursuant to this subparagraph must be posted in the affected area.**

Response: The requirements of paragraph (1)(c) will be met by the Owner, in conjunction with actions by the City, as follows:

**(1)(c) Except as otherwise provided, the following provisions apply to all proposed brownfield area designations:**

**1. Notification to department following adoption.—A local government with jurisdiction over the brownfield area must notify the department ... of its decision to designate a brownfield area for rehabilitation for the purposes of ss. 376.77-376.86. The notification must include a resolution adopted by the local government body. The local government shall notify the department... of the designation within 30 days after adoption of the resolution.**

Response: The City will transmit copy of resolution approving designation of the Property to the Florida Department of Environmental Protection (FDEP), within 30 days of adoption.

**2. Resolution adoption.—The brownfield area designation must be carried out by a resolution adopted by the jurisdictional local government, which includes a map adequate to clearly delineate exactly which parcels are to be included in the brownfield area or alternatively a less-detailed map accompanied by a detailed legal description of the brownfield area. For municipalities, the governing body shall adopt the resolution in accordance with the procedures outlined in s. 166.041, except that the procedures for the public hearings on the proposed resolution must be in the form established in s. 166.041(3)(c)2.**

Response: City will adopt the resolution designating the Property as a brownfield area in accordance with the procedures outlined in s. 166.041, except that the procedures for the public hearings on the proposed resolution will be in the form established in s. 166.041(3)(c)2, F.S.

**3. Right to be removed from proposed brownfield area.—If a property owner within the area proposed for designation by the local government requests in writing to have his or her property removed from the proposed designation, the local government shall grant the request.**

Response: This section is not applicable, as the Owner proposes designation of only the Property owned by Owner.

**4. Notice and public hearing requirements for designation of a proposed brownfield area ... by a nongovernmental entity. Compliance with the following provisions is required before designation of a proposed brownfield area under ... paragraph (2)(c):**

**a. At least one of the required public hearings shall be conducted as closely as is reasonably practicable to the area to be designated to provide an opportunity for public input on the size of the area, the objectives for rehabilitation, job opportunities and economic developments anticipated, neighborhood residents' considerations, and other relevant local concerns.**

Response: Given public health considerations raised by large public gatherings in light of COVID-19, the first public hearing for the purpose of providing interested parties the opportunity to provide comments or suggestions about the potential designation of the Property will be held by means of communications media technology pursuant to Executive Order 20-69, issued by the Governor of

the State of Florida on March 20, 2020 (as extended by Executive Order 20-112, Executive Order 20-123, Executive Order 20-139, Executive Order 20-150 and Executive Order 20-179) and Section 120.54, Florida Statutes.

**b. Notice of a public hearing must be made in a newspaper of general circulation in the area, must be made in ethnic newspapers or local community bulletins, must be posted in the affected area, and must be announced at a scheduled meeting of the local governing body before the actual public hearing.**

Response:

- Notice of all public hearings will be published by Owner in the North Port Sun.
- The City will prepare and post signs at the Property required to provide notice of the public hearings.
- The City will announce the public hearings at a scheduled meeting of the City Council before the date and time of the actual public hearings.

**5. The person proposing the area for designation has provided reasonable assurance that he or she has sufficient financial resources to implement and complete the rehabilitation agreement and redevelopment of the brownfield site.**

Response: The development of the Central Parc project is being managed by GNP Development Partners, LLC. ("GNP") which is a member of the Owner/developer entity. GNP is a privately owned, boutique real estate investment and development firm based in central Florida, with projects throughout the United States. The firm has a track record of more than \$1 billion in investment, development and advisory and is currently developing over 500,000 SF. GNP offers a fully-integrated, national real estate platform with capabilities in development (as is the case here), principal investment and asset management. GNP's website <https://gnpdev.com/> shows this project as well as many other large scale projects by GNP throughout Florida and nationally, and provides further information about the GNP and its track record of successful developments.

**Sabal Trace Developments Partners, LLC,**  
a Florida limited liability company

  
by: Mark Gerenger, Vice President