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March 4, 2022

Tad Calkins, Director  
Brevard County Planning and Development  
2725 Judge Fran Jamieson Way  
Viera, FL 32940

**RE: Health First Wellness Village  
PUD/PDP Draft Application  
County staff review comments**

Dear Mr. Calkins:

We have received the review comments provided during the March 3, 2022 pre-application meeting. Please note the following response to comments numbered accordingly:

1. Need to add Health First Shared Services, Inc. to ownership block.  
**Response: The ownership block on the PDP has been revised.**
2. Need to specify company representative is representing both owners or you will need to submit authorized agent information for 2<sup>nd</sup> owner (Health First Shared Services, Inc.).  
**Response: The Sunbiz information has been added to the application package showing Michael Scialdone is listed on both corporations (Health First, Inc and Health First Shared Services, Inc) as EVP,CFO.**
3. Need completed/notarized/signed documents.  
**Response: Noted, to be provided with submittal.**
4. Please update the vicinity map to include information on adjacent development and subdivisions per Section 62-1448 (b)(2)(b)(4) of Brevard County Code.  
**Response: The vicinity map has been revised per comment.**
5. PUD request for heliport needs to be reviewed as similar to a Conditional Use Permit (CUP) for private heliport. See CUP requirements.  
**Response: The narrative has been revised to request a waiver from Sec 62-1944.5 Private heliports.**
6. Please remit noise contours for approach and takeoff flight paths.  
**Response: Please see response to comment 5.**
7. Please remit copy/approval of FAA review for capability.  
**Response: Please see response to comment 5.**
8. Please remit copy/approval from TICO Authority for airspace control around the Merritt Island airport.  
**Response: Please see response to comment 5.**

9. Both the waiver requests and the heliport request need justification submitted to explain why such waivers need to be reviewed/granted. PDP needs more analysis than simple waiver or exemption request.

**Response: Please see response to comment 5.**

10. Please provide architectural renderings to depict scale and scope of the project. Current submittal doesn't capture the complexity and integration of the site using the 2-level parking garage as a connecting feature.

**Response: The applicant will provide an architectural rendering as soon as it is completed and approved for submittal.**

11. Has it been decided whether the elevated helipad is preferred over the ground level site? Are both locations still viable? Please advise.

**Response: Both locations are still in consideration.**

12. Additional building height waivers need to be reevaluated as current data may not accurately reflect compliance with the building height definition identified below in comment #14.

**Response: The building height waivers have been reevaluated and revised based on the county staff review comments and the 3/3/2022 pre-app meeting.**

13. NRMD and site plan waivers are not part of the PUD waiver process. Those requests will need to be removed and applied at the site plan review stage. Only waivers from Chapter 62, Article VI & VIII are permitted to be requested as this project is not a DRI (Development of Regional Impact).

**Response: Removed.**

14. The legal description on the PDP graphic only identifies three (3) tax account numbers. Please update to add the fourth parcel.

**Response: PDP revised per comment.**

15. Building height is measured from the average elevation of the finished development grade of the building site. Additionally, only one level of parking is exempted from building height definition. You may need to add a waiver request to provide for a second level for parking exemption and recalculate your building height and setback waivers to be consistent with code allowances.

**Response: The waiver requests have been updated to assume a finished development grade and a waiver has been added to request an exemption for the second level of parking in the parking structure underneath the Wellness Village.**

16. Proposed setbacks do not match on PDP.

**Response: The PDP has been revised.**

Justification needs to be provided as to how the structures will be maintained with a zero setback.

**Response: The zero setback is for the retaining walls and access stairway, they typically require minimal maintenance and can be accessed from the applicants property and/or public right of way.**

*Building height.*

- (1) *Where a building or structure is constructed with a flat roof, the height of the building or structure shall be the vertical distance measured from the average elevation of the finished development grade of the building site to the finished elevation of the flat roof of the uppermost story, excluding elevator or mechanical equipment screens.*
- (2) *Where a building or structure is constructed with a hip roof or gabled roof, the height of the building or structure shall be the vertical distance measured from the average elevation of the finished development grade of the building site to the highest bearing point of the roof trusses or roof joists of an acceptable slope, which slope shall not exceed 45 degrees or 12-on-12, provided that any habitable space located within the confines of the acceptable slope shall be solely for the use of the occupants of the floor immediately below and not used as a separate occupancy. Church steeples, bell towers, or other similar features customarily used to identify a church shall be excluded from the height restriction, as long as the height at the top of the identifying feature as measured from finished development grade does not exceed 200 percent of the maximum height or height threshold.*
- (3) *Where one level of parking is provided under any principal building, excluding single family homes, building height shall be measured from the elevation of the lowest point of the structure of the first habitable floor to a point defined in either subsection (1) or (2) of this definition; provided, however, that setbacks, breezeway/visual corridor and fire protection requirements under this article shall be based on building height as measured from the average elevation of the finished development grade of the building site.*

17. Please verify that the Site Section Diagram identifying building heights is based upon the average elevation of the finished development grade of the building site. Currently base information starts at a "0" zero feet measurement. If this number needs to be adjusted, it will affect all buildings/structure heights on the property.

**Response: The Site Section Diagram has been revised per the pre-application meeting and to provide clarification on building height vs design elevation.**

18. Hospital site does not appear to be utilizing understory parking so total building height will need to be utilized for setback building height waivers.

**Response: There is no understory parking under the hospital building.**

19. Since the parking structure is integrated into all buildings except for the hospital and the CUP (central utility plant), no separation distances between those other buildings need to be identified.

**Response: The building separation table has been revised.**

Separation distance between the CUP and hospital buildings need to be identified. Please provide the separation distance as it was not provided.

**Response: The building separation table has been revised.**

20. If building mounted communication equipment taller than 60-feet above ground level is utilized, you will need to comply with the lighting provision of Section 210-1 of Brevard County Code.

**Response: Comment noted, this requirement will be addressed during the design phase.**

21. Hospital setback height waiver of 2:1 (building height) requires a minimum setback of 300 feet from the RU-1-9 single-residential zoning boundary along the north side of E. Merritt Island Avenue. The setback waiver request is 19-feet, based upon 181' setback from the north property line and the 100' wide road right-of-way (E. Merritt Ave.).

**Response: This additional waiver request has been added.**

22. Please verify whether the coffee shop and education center buildings meet building height (over 35-foot height limit) setbacks from the bank (SE corner) property line.

**Response: The coffee shop and education center is part of the Wellness Village/parking garage structure. The waiver requests have been updated.**

23. Additional building height waivers to non-residential use located to the west and SE corner needs to be amended. Waivers to roadways is not applicable except for PUD perimeter setbacks.

**Response: These waiver requests have been removed from the narrative.**

24. The hospital building does not need an additional building height waiver to the west (complies at the proposed location).

**Response: This waiver has been removed.**

The CUP building needs a 4.5-foot additional building height waiver for additional building setback to the west.

**Response: Based on the revised PDP and average finished grade this waiver request no longer applies.**

The MOD building needs an 8.25-foot additional building height waiver to the west.

**Response: This waiver request has been revised based on the average finished grade elevation .**

25. Please verify the hospital to CUP building separation distance is at least 40-feet. If not, add waiver request for the shortage.

**Response: The CUP building separation distance exceeds 40 ft. This information has been added to the building separation table.**

26. Project front setback is 25-feet. As a double frontage lot, both E. Merritt Ave. and Highway 520 (E. Merritt Island Cswy.) are used as fronts and require a minimum 25-foot setback.

**Response: The waiver requests has been revised have been revised based on 25ft front setback for E. Merritt Ave and E. Merritt Island Cswy.**

Borman Drive can utilize a 15-foot side street setback.

**Response: The waiver requests has been revised have been revised based on 15ft side street setback for Borman Dr.**

The western and SE setbacks from adjacent commercial sites is 5-foot setbacks. Any waiver of these minimum setbacks needs to be applied for as part of the base zoning criteria as identified in the BU-1 commercial zoning classification as identified in Section 62-1446 (d) (8) of Brevard County Code.

**Response: A waiver request has been added.**

27. Zoning and other County departments reserves the right to provide additional comments.

**Response: Comment noted.**

**NRM Comments:**

1. The Board of Commissioners recently passed some policies related to the requirements of Perils of Flood by the Florida Statutes 163.178 (2)(f), considering among other issues, the implementation of Low Impact Development. The applicant may wish to incorporate some aspects of resiliency/LID strategies at design and engineering. This project also provides an opportunity to re-establish recharge of the aquifer. Please feel free to contact NRM to discuss potential opportunities.

**Response: Comment noted.**

The conceptual plan references a rooftop park and other landscaping. Due to the unique nature of the project, the applicant should work with staff to develop a landscape design that meets code prior to any engineering design. Rooftop and indoor plantings require several strategies for successful, long-term plant growth such as: Growing medium, Root barriers, Filter membrane/fabric, Drainage/storage layer, Insulation, Waterproof barrier, and Roof support.

**Response: Comment noted.**

**Traffic Engineering Comments:**

1. A Traffic Impact Study will be required. A methodology memorandum is strongly encouraged to facilitate an agreement between the Engineer and the Review Engineer on trip generation, trip distribution, analysis extent, analysis periods, and other items as applicable to the development prior to proceeding with the analysis. All trip generation must be based on the latest edition of the ITE Trip Generation Manual (11<sup>th</sup>).

**Response: A methodology memorandum has previously been submitted to BCTO, this will be updated based on the current PDP prior to starting the TIA.**

2. Trip generation credits will not be recognized for any land uses not in operation in 2019 or later.

**Response: Comment noted.**

3. There are operational concerns about the connection at SR 520, specifically regarding the geometry and proximity of the roundabout.

**Response: Comment noted, we will work with staff to address their concerns on the roundabout during the design and permitting phase.**

The PUD/PDP has been revised as noted above. If you require any additional information or have any questions, please contact me at (321) 775-6641 or by email [john.wilt@atkinsglobal.com](mailto:john.wilt@atkinsglobal.com).

Sincerely,  
**ATKINS**



John H. Wilt, P.E.  
Senior Engineer IV

Cc: Health First – Jonathan Flyte  
Kimberly Rezanka