

From: Victoria Alterman <valterma5858@icloud.com>

Sent: Wednesday, June 10, 2026 7:16 PM

To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>

Subject: Townhouse Project - Turtle Mound and White Road: Against this Project

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Mr. Altman,

I am a resident on 4525 White Road and I do not support this project. Our community is bound by two lane roads (White Road, Carrolwood Road and Turtlemound Road) with road shoulders that are actually deep drainage ditches. These drainage ditches are essential to prevent flooding in the area. Many homes flooded during Tropical Storm Fay and this area had significant work to prevent flooding. The townhouse project potentially reverses those gains.

Traffic is another significant issue in this community. The intersection at Aurora Road and Turtlemound is a 4-way stop. This intersection has significant traffic and multiple accidents on a regular basis. It really needs a traffic light to be safe with existing properties. Add 86+ households and it becomes deadly due to excessive use.

Although there are mobile homes and other dense developments in the area, we have reached our maximum capacity. Also, the area is also a designated rural, horse community. Additional dense housing developments do not fit with the current zoning and usage of properties.

Please reject this project.

Sincerely,
Victoria Alterman
4525 White Road
Melbourne, FL 32934
321-522-7812
Sent from my iPhone

From: Cheryl Askew <askewcheryl@yahoo.com>
Sent: Monday, June 8, 2026 11:55 AM
To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>
Subject: Defender homes case 26200008

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Hello,

My name is Cheryl Askew at 2625 Lakemont Rd , Melbourne 32934.

I'm am opposed to expanding the zoning on Turtle Mound Rd. I purposely bought into this lower density neighborhood in 2009 when no one else wanted it. I'm very concerned about the increase in traffic this would cause. We are already having heavy congestion on Lake Washington and speeding and accidents. I'm not aware that any studies were done to observe this but we are close to needing a traffic light just to get past Turtle mound. This was a quiet horse neighborhood that I am paying taxes on. Not a dense housing area.

Thank you

Cheryl

[Sent from Yahoo Mail for iPad](#)

From: deerwood@cfl.rr.com <deerwood@cfl.rr.com>
Sent: Saturday, June 6, 2026 5:45 PM
To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>
Subject: Opposed Turtle Mound Re Zoning

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

I am opposed to the request to change the zoning for 1800 Turtle Mound Rd to RU-2-6 for the same reasons set forth in my neighbor, Scott Schiffer's letter dated June 5, 2026.

Thank You,

Sharon Ayers
4305 Deerwood Tr.
Melb. 32934

From: Kitty Barker <barkerkitty1@gmail.com>

Sent: Wednesday, June 3, 2026 3:18 PM

To: Zoning <Zoning@brevardfl.gov>; LandDevelopment <LandDevelopment@brevardfl.gov>

Subject: Case#26Z00008 AND CASE 26S.02

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

I strongly oppose this project for Defender Homes Airway Heights LLC and have attached my formal letter stating my reasons.

Thank you

Kitty Barker

June 3, 2026

Subject: Formal Objection: Case 26Z00008 & Case 26S.02 – Defender Homes Airway Heights LLC

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board,

Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)

My name is Keturah Barker and I reside at 2604 Melissa CT, which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6 and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

1. Zoning Incompatibility

The surrounding area is an established lower-density rural residential community. Introducing multiple-family high-density housing directly contradicts the established neighborhood character, destroys the rural fabric of this corridor, and sets a damaging zoning precedent that will invite future high-density development throughout the area.

2. Traffic and Safety

Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create significant safety hazards for existing residents. I formally request that a comprehensive traffic impact study be required and made fully available to the public prior to any approval being considered by this Board.

3. Drainage, Wetlands, and Flooding

This sector has known and documented challenges with drainage, wetlands, and existing crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks for surrounding properties and damage sensitive local wetlands. Where applicable, Florida Department of Environmental Protection and United States Army Corps of Engineers jurisdiction over any wetlands on or adjacent to this property must be fully evaluated and disclosed before this rezoning is considered.

4. Infrastructure and Utility Capacity

The existing water, sewer, and emergency services infrastructure in this area was not designed to accommodate the demands of a high-density multi-family development. No approval should be granted without a full infrastructure capacity analysis confirming that existing systems can support this level of increased demand without negatively impacting current residents.

5. School Capacity

The addition of a high-density multi-family residential complex will place immediate and significant pressure on the enrollment capacity of local schools. The Board should require a school impact analysis prior to approval and coordinate with Brevard County Public Schools to assess whether existing facilities can absorb this growth.

6. Property Values

The proposed rezoning and resulting development will negatively impact the property values of surrounding residential homes. Residents have made long-term investments in this community based on its established rural residential character. Approving this rezoning undermines those investments and the reasonable expectations of the existing homeowners in this area.

I formally request the following:

That this objection be included in the official case file for Case 26Z00008 and Case 26S.02

That it be distributed to all Board members prior to the public hearing on June 15, 2026

That my opposition be noted in the official meeting minutes

That the Board require a full traffic impact study, infrastructure capacity analysis, school impact analysis, and wetlands evaluation before any vote is taken

That if the community has not had adequate time to organize and respond to this proposal, the Board grant a continuance to allow full public participation

Thank you for your time, service, and consideration of our community's safety, character, and integrity.

I also want to include my personal opinion concerning this project.

Please do not approve this rezoning request.

When previous owners sought to develop this property into smaller lots, they were denied. Multiple local builders have also attempted to change the zoning over the years but have been unsuccessful. You denied single-family home projects. Even the owners of the modular homes adjacent to this property were told no. Given that history, it is difficult to understand why this proposal is now being considered. I would hope it is not just a case of "big money gets what it wants." Do what is best for the area and abide by what the residents, who will be most affected by this, want.

Allowing this rezoning would have a significant negative impact on our community. The existing roads and infrastructure were not designed to handle the increased traffic that would result from a higher-density development. Residents already experience growing congestion, particularly in the Lake Washington, Turtle Mound Road and Wickham Road area, and additional development will only make these issues worse.

Many of us chose to live here because the Lake Washington area has maintained its rural character, open space, wildlife, and peaceful atmosphere. I have lived in this area since 1974 and have watched Melbourne grow dramatically. The Lake Washington community has long been known for its quiet estates, natural beauty, and abundant wildlife, and we want to preserve those qualities for future generations.

This area provides habitat for turtles, birds, wetlands, and other native wildlife that are steadily losing ground as development continues. Once these natural spaces are destroyed, they cannot be replaced.

There are already numerous aging or underutilized commercial properties and previously developed areas throughout Melbourne that could be revitalized and repurposed. Growth should be directed toward those locations rather than pushing higher-density development deeper into established neighborhoods and remaining green spaces.

Please protect the character of the Lake Washington area and deny this rezoning request.

If you care about: • Traffic congestion and safety • Protecting wildlife and natural habitat • Preserving the character of the Turtle Mound/Lake Washington area • Overdevelopment and loss of green space, DO NOT approve this multi-family project.

Sincerely,
Keturah A. Barker
2604 Melissa CT, Melbourne, FL 32934
321-288-8236
BarkerKitty1@gmail.com



From: Elana Breiner <elanabreiner@yahoo.com>

Sent: Friday, June 5, 2026 9:30 AM

To: Zoning <Zoning@brevardfl.gov>

Subject: Re: RU-2-6 Turtle Mound

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Attention Brevard County Zoning Official:

Good morning,

I will be unable to attend the hearing on June 15th due to work but wanted to provide my feedback briefly. I am opposed to the development of any multiple-family housing due to how it would significantly increase traffic in Melbourne.

The apartments and HOA/tiny lot housing developments that have occurred in and around this area over the past 5 years is more than enough.

Our roads and schools can barely accommodate this population as is.

Thank you,

Local Resident

Elana

From: kmbrown727@yahoo.com <kmbrown727@yahoo.com>

Sent: Tuesday, June 2, 2026 8:06 PM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Cc: David Brown <dabrown209@gmail.com>

Subject: Formal Objection: Case 26Z00008 & Case 26S.02 – Defender Homes Airway Heights LLC

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board,

Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)

We are Kimberly and David Brown, and we reside at 1640 Marcello Drive, which is located near the proposed development site. We am writing to formally register our strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. We urge the Board to deny the request to shift this property from RES 4 to RES 6 and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

1. Zoning Incompatibility

The surrounding area is an established lower-density rural residential community. Introducing multiple-family high-density housing directly contradicts the established neighborhood character, destroys the rural fabric of this corridor, and sets a damaging zoning precedent that will invite future high-density development throughout the area.

2. Traffic and Safety

Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create significant safety hazards for existing residents. I formally request that a comprehensive traffic impact study be required and made fully available to the public prior to any approval being considered by this Board.

3. Drainage, Wetlands, and Flooding

This sector has known and documented challenges with drainage, wetlands, and existing crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks for surrounding properties and damage sensitive local wetlands. Where applicable, Florida Department of Environmental Protection and United States Army Corps of Engineers jurisdiction over any wetlands on or adjacent to this property must be fully evaluated and disclosed before this rezoning is considered.

4. Infrastructure and Utility Capacity

The existing water, sewer, and emergency services infrastructure in this area was not designed to accommodate the demands of a high-density multi-family development. No approval should be granted without a full infrastructure capacity analysis confirming that

existing systems can support this level of increased demand without negatively impacting current residents.

5. School Capacity

The addition of a high-density multi-family residential complex will place immediate and significant pressure on the enrollment capacity of local schools. The Board should require a school impact analysis prior to approval and coordinate with Brevard County Public Schools to assess whether existing facilities can absorb this growth.

6. Property Values

The proposed rezoning and resulting development will negatively impact the property values of surrounding residential homes. Residents have made long-term investments in this community based on its established rural residential character. Approving this rezoning undermines those investments and the reasonable expectations of the existing homeowners in this area.

We formally request the following:

That this objection be included in the official case file for Case 26Z00008 and Case 26S.02

That it be distributed to all Board members prior to the public hearing on June 15, 2026

That my opposition be noted in the official meeting minutes

That the Board require a full traffic impact study, infrastructure capacity analysis, school impact analysis, and wetlands evaluation before any vote is taken

That if the community has not had adequate time to organize and respond to this proposal, the Board grant a continuance to allow full public participation

Thank you for your time, service, and consideration of our community's safety, character, and integrity.

Sincerely,

Kimberly and David Brown

1640 Marcello Drive

Melbourne, FL 32934

321-626-8845

Kmbrown727@yahoo.com

Subject: Formal Objection: Case 26Z00008 (Defender Homes Airway Heights LLC) (1800 Turtle Mound Road)

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board,

My name is Wendy Browning, my husband Ricou & I reside at 4080 Careywood Drive, which has been our home for the past 39 years. Carolwood Estates is our subdivision, located 0.3 miles from the proposed development site. I am writing to formally register our strongest possible objections to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road.

We urge the Board to please DENY :

- a) the request to shift this property from RES 4 to RES 6, and**
- b) the request to shift this property from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6).**

We have itemized the relevant facts to our objections as follows.

Environment & Background: Carolwood Estates is a 40-year-old neighborhood located off Turtlemound Road and Carolwood Drive, consisting of 60 homes, a public park, playground, pavilion and a lake. Our homes are all custom- built on one - two acres minimum. Our home values are in the \$600,000-\$1,200,000 range.

This proposed project located just 1/3 of a mile from our Subdivision would drastically affect not only our well-established property values, but also the feel of this entire area. The properties surrounding our subdivision comprise a rural community - with horses, livestock, built on parcels ranging from 1-5 acres in size.

This rural environment is a way of life for the 60 homes of Carolwood Estates – as well as our surrounding communities - and has been for 40 years.

Zoning and Property Value Incompatibility: Given all of the facts described above, the proposed encroachment of multiple-family, high-density housing into our area of well-established, multi-acre homesteads would cause severe & devastating impacts on our area and it's property values – which have been developed through **decades** of investment by our residents.

In addition, approval of such a nonconforming project – directly adjacent to our area would set forth damaging precedents for future zoning considerations.

Traffic and Safety: Neither Turtle Mound Road nor White Road are structurally designed to support any further traffic increases caused by multi-family densities on the already present heavy volume. Consequently, **safe** traffic flow in this area is already deteriorating due to the facts below.

Our community of Carolwood Estates has only one entrance / exit. This is via Carolwood Drive, with the east end directly intersecting Turtlemound Road. At present, Turtlemound Road is already suffering from increasing traffic volume and higher speeds due to:

- a) the overflow of commercial traffic from Wickham Road;
- b) the extension to Eau Gallie Blvd;
- c) the Amazon warehouse traffic, and
- d) the lack of ability to widen this area from the present single lanes.

The current traffic on Turtle mound Road backs up daily - at both the Aurora Road and the Lake Washington four-way stop intersections. Carolwood Drive - our subdivision's only entrance / exit road, located between these two difficult intersections - is already suffering from this increasing traffic volume, which makes it extremely difficult to leave our neighborhood at present.

Drainage and Wetland Preservation: This sector of Turtle Mound Road and White Road has presently-known challenges with drainage, wetlands, and existing local crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks and damage sensitive local wetlands. Many of the properties surrounding the proposed area already flood in heavy storms. The Turtle mound Road drainage ditch at present is unable to handle all the run off it receives during current rainy seasons.

Please include this objection in the official case file and distribute it to all board members prior to the upcoming public hearing on June 15, 2026. I request that my opposition be noted in the official meeting minutes. Thank you for your time, service, and consideration of the community's safety and integrity.

Sincerely,

Ricou and Wendy Browning
4080 Careywood Drive
Melbourne, Fl. 32934

321-432-5319

wendy.browning@icloud.com

From: Douglas Buerger <buerdg@gmail.com>

Sent: Friday, June 5, 2026 8:55 PM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Subject: Formal Objection: Case 26Z00008 & Case 26S.02 – Defender Homes Airway Heights LLC

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board,
Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)

My name is Douglas Buerger, and I reside at 1550 Marcello Drive which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6 and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

1. Zoning Incompatibility

The surrounding area is an established lower-density rural residential community. Introducing multiple-family high-density housing directly contradicts the established neighborhood character, destroys the rural fabric of this corridor, and sets a damaging zoning precedent that will invite future high-density development throughout the area.

2. Traffic and Safety

Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create significant safety hazards for existing residents. I formally request that a comprehensive traffic impact study be required and made fully available to the public prior to any approval being considered by this Board.

3. Drainage, Wetlands, and Flooding

This sector has known and documented challenges with drainage, wetlands, and existing crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks for surrounding properties and damage sensitive local wetlands. Where applicable, Florida Department of Environmental Protection and United States Army Corps of Engineers jurisdiction over any wetlands on or adjacent to this property must be fully evaluated and disclosed before this rezoning is considered.

4. Infrastructure and Utility Capacity

The existing water, sewer, and emergency services infrastructure in this area was not designed to accommodate the demands of a high-density multi-family development. No approval should be granted without a full infrastructure capacity analysis confirming that existing systems can support this level of increased demand without negatively impacting current residents.

5. School Capacity

The addition of a high-density multi-family residential complex will place immediate and significant pressure on the enrollment capacity of local schools. The Board should require a school impact analysis prior to approval and coordinate with Brevard County Public Schools to assess whether existing facilities can absorb this growth.

6. Property Values

The proposed rezoning and resulting development will negatively impact the property values of surrounding residential homes. Residents have made long-term investments in this community based on its established rural residential character. Approving this rezoning undermines those investments and the reasonable expectations of the existing homeowners in this area.

I formally request the following:

That this objection be included in the official case file for Case 26Z00008 and Case 26S.02

That it be distributed to all Board members prior to the public hearing on June 15, 2026

That my opposition be noted in the official meeting minutes

That the Board require a full traffic impact study, infrastructure capacity analysis, school impact analysis, and wetlands evaluation before any vote is taken

That if the community has not had adequate time to organize and respond to this proposal, the Board grant a continuance to allow full public participation

Thank you for your time, service, and consideration of our community's safety, character, and integrity.

Sincerely,

Douglas Buerger

1550 Marcello Drive

757-285-4677

buerdg@gmail.com

Subject: Formal Objection: Case 26Z00008 & Case 26S.02 – Defender Homes Airway Heights LLC

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board,

Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)

My name is Caroljean Canfield and I reside at 1584 Bonelli Ct., Melbourne, Fl. , which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6 and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

1. Zoning Incompatibility

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2. Traffic and Safety

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3. Drainage, Wetlands, and Flooding

This sector has known and documented challenges with drainage, wetlands, and existing crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks for surrounding properties and damage sensitive local wetlands. Where applicable, Florida Department of Environmental Protection and United States Army Corps of Engineers jurisdiction over any wetlands on or adjacent to this property must be fully evaluated and disclosed before this rezoning is considered.

4. Infrastructure and Utility Capacity

The existing water, sewer, and emergency services infrastructure in this area was not designed to accommodate the demands of a high-density multi-family development. No approval should be granted without a full infrastructure capacity analysis confirming that existing systems can support this level of increased demand without negatively impacting current residents.

5. School Capacity

The addition of a high-density multi-family residential complex will place immediate and significant pressure on the enrollment capacity of local schools. The Board should require a school impact analysis prior to approval and coordinate with Brevard County Public Schools to assess whether existing facilities can absorb this growth.

6. Property Values

The proposed rezoning and resulting development will negatively impact the property values of surrounding residential homes. Residents have made long-term investments in this community based on its established rural residential character. Approving this rezoning

undermines those investments and the reasonable expectations of the existing homeowners in this area.

I formally request the following:

That this objection be included in the official case file for Case 26Z00008 and Case 26S.02

That it be distributed to all Board members prior to the public hearing on June 15, 2026

That my opposition be noted in the official meeting minutes

That the Board require a full traffic impact study, infrastructure capacity analysis, school impact analysis, and wetlands evaluation before any vote is taken

That if the community has not had adequate time to organize and respond to this proposal, the Board grant a continuance to allow full public participation

Thank you for your time, service, and consideration of our community's safety, character, and integrity.

Sincerely,

Caroljean Canfield

1584 Bonelli Ct.

Melbourne, Fl.

Whitewind0376@gmail.com

954-464-6086

From: Darla Carter <Darla@durhamandsons.com>

Sent: Friday, June 5, 2026 10:30 AM

To: Commissioner, D4 <D4.Commissioner@brevardfl.gov>; Commissioner, D5 <D5.Commissioner@brevardfl.gov>; Commissioner, D2 <D2.Commissioner@brevardfl.gov>; Commissioner, D3 <d3.commissioner@brevardfl.gov>

Subject: Turtle mound Townhome development

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

I would like to make known my strong opposition to the Townhome development on Turtle mound being developed.

I have lived off Parkway since 1986. My whole family lives in the general area as well. We have watched the unwelcome development of many areas, but this one is just completely unacceptable. The wildlife habitats have already been decimated by development, and the flooding is bad already. The traffic on Turtle mound and Aurora in the mornings and afternoon is horrible already, I can't fathom adding all those townhomes and hundreds of cars to this already extremely congested area.

Are you making a list of people opposing this development? Please respond with your plan to note the opposition of the local families, and that my name has been placed on that list. If there is further action that I should take, please let me know that as well.

Thank you,

Darla Carter
4589 Parkway Dr
Melbourne, FL 32934

From: [Darla Carter](#)
To: [AdministrativeServices](#)
Subject: Turtle mound Townhome development
Date: Friday, June 5, 2026 3:15:06 PM

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

I would like to make known my strong opposition to the Townhome development on Turtle mound being considered by the Zoning Board. I could not find emails for the Zoning Board that is bringing this up for discussion June 15.

I have lived off Parkway since 1986. My whole family lives in the general area as well. We have watched the unwelcome development of many areas, but this one is just completely unacceptable. The wildlife habitats have already been decimated by development, and the flooding is bad already. The traffic on Turtle mound and Aurora in the mornings and afternoon is horrible already, I can't fathom adding all those townhomes and hundreds of cars to this already extremely congested area.

Is there a way for me to get email addresses so I can send this to them? Or can you forward it?

Thank you,

Darla Carter
4589 Parkway Dr
Melbourne, FL 32934

From: Mark Caulfield <mcaulfieldfla@gmail.com>

Sent: Tuesday, June 2, 2026 9:06 PM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Subject: Formal Objection: Case 26Z00008 (Defender Homes Airway Heights LLC) (1800 Turtle Mound Road)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Ms. Gilliam,

Please process the attached letter of formal objection in the above referenced matter, and let me know if you require anything further.

Thank you.

Mark F. Caulfield CPA, CGMA, MBA

250 Minorca Beach Way # 304 • New Smyrna Beach, FL 32169

4090 Careywood Drive • Melbourne, FL 32934

Tel: [321.288.3440](tel:321.288.3440) • mcaulfieldfla@gmail.com

Re: Formal Objection - Case 26Z00008 Defender Homes Airway Heights LLC - 1800 Turtle Mound Road

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board,

This letter is to formally register our **strongest** possible objections to the above referenced case – the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road.

This objection requests that your Board **DENY BOTH PROPOSALS** - the proposed request to shift the above property from RES 4 to RES 6, as well as the request to shift this property from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6).

Background

My wife & I reside at 4090 Careywood Drive in the Carolwood Estates subdivision, located just one block from the proposed development site. Carolwood is a very long-established, highly-recognized and sought after private community - consisting of approximately 60 custom-built, single-family homesteads located on one - two acre properties, with values as high as over \$1million.

The Carolwood Estates name has been well-known in the Brevard real estate industry for decades. In addition, the area surrounding Carolwood Estates consists of rural properties ranging from 1-5 acres, many with horse and livestock facilities.

Objections

1. **Incompatibility** - The above project proposes to build multi-family housing - adjacent to / and in **direct conflict** with our surrounding rural, multi-acre communities as described above. This is completely and unarguably incompatible with our longstanding, established homestead properties.
2. **Financial** - The potential consequences from this project on the residents of Carolwood and the surrounding rural areas would be far-reaching - beginning with the impact on our well-established **property values**. Such an incongruity encroaching on our homestead properties – located just one block away - clearly presents **financial risk to well over 100 residences**.
3. **Traffic and Safety** – The above project proposes to bring the impact of additional multi-family traffic to an area which presently suffers from **numerous significant traffic congestion and safety issues**:
 - a. The Turtlemound Road area already suffers significant traffic back-ups every day - at both of the 4-way stop intersections at Aurora Road **and** Lake Washington Road. This impacts both safety as well as emergency vehicles trying to drive on single-lane roads with **no shoulders**.
 - b. Turtle Mound Road and White Road are single-lane rural streets, clearly not capable of providing for further traffic increases. Turtle Mound lacks the ability for any widening from the present single lanes – with no shoulders.
 - c. Carolwood Estates has **one** entrance / exit - Carolwood Drive. As this street ends at the congestion of Turtlemound Road, our residents already experience a great deal of difficulty just to enter / exit our neighborhood.

- d. Our residents clearly see the progressively increasing safety impacts of higher traffic volume and greater speeds on Turtlemound Road as it is today. It is very obvious to us this area cannot afford the effects of significantly more cars & trucks on the present roads and traffic flow.
- e. **This Turtlemound Road area has already been forced to absorb higher traffic flow / greater safety risks due to:**
 - the extension of Turtlemound Road to Eau Gallie Blvd;
 - the increasing overflow of north-south traffic flow from Wickham Road, and
 - the additional impact from Amazon's warehouse trucks.

All of this – with no ability to widen the roads in this area from the present single lanes with no shoulders.

4. **Wetlands and Drainage**

The Turtle Mound Road area is already burdened with significant issues posed by water runoff and drainage, wetlands, and existing crown elevation. This proposal to increase the related population density certainly adds even more flood risk and wetland damage. The Turtlemound Road drainage ditch at present is unable to handle all the run off it receives during current rainy seasons.

5. **Future precedent** - In addition, approval of such a nonconforming project – directly adjacent to an area as recognized and regarded as the Carolwood Road communities - would set the risk for future similarly damaging precedents in zoning considerations.

Please process the above objections to this proposal with the official case file, and distribute copies to all board members for the Public Hearing on June 15, 2026. Our opposition is hereby requested to be noted in the official meeting minutes. Thank you.

Sincerely,

Mark & Cynthia Caulfield

321-288-3440 / mcaulfieldfla@gmail.com

From: Gabriella Davey <gtomasura@gmail.com>
Sent: Tuesday, June 2, 2026 5:07 PM
To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>
Subject: Rezoning Case 26S.02

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board
Re: Formal Objection to Case 26Z00008 & Case 26S.02 ([1800 Turtle Mound Road](#))

My name is Gabriella Davey, and I reside at 4640 Hidden Lakes Place, Melbourne, FL 32934, which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6, and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

Zoning Incompatibility: The surrounding area is established as a lower-density, rural residential community. Introducing multiple-family high-density housing destroys the established neighborhood character and sets a damaging zoning precedent.

Traffic and Safety: Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create safety hazards.

Drainage and Wetland Preservation: This sector has known challenges with drainage, wetlands, and existing local crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks and damage sensitive local wetlands.

Please include this objection in the official case file and distribute it to all board members prior to the upcoming public hearing on June 15, 2026. I request that my opposition be noted in the official meeting minutes. Thank you for your time, service, and consideration of the community's safety and integrity.

Sincerely,
Gabriella Davey

From: Jenna Denault <jenna67@gmail.com>

Sent: Friday, June 5, 2026 10:12 PM

To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>

Subject: Rezoning notice 26Z00008 - Turtle Mound Rd & White Rd

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

PLEASE do not allow an out of state apartment management company to rezone and crowd our local infrastructure. We do not need more packed communities. This company does not care about our community or our day to day lives, they live out of state. The infrastructure already can't handle the people we do have, and there are already drainage issues in the area. Around the Lake Washington area is one of the few remaining places zoned with some decent sized lots for people to own. We do NOT need to pack more people in like sardines! Please stop this!

I hope the community continues to reach out in regards to this proposal and is able to stop this. Thank you for your time.

Regards,
Jenna

From: [MaryAnna Draper](#)
To: [Commissioner, D4](#)
Subject: Proposed Rezoning
Date: Friday, June 5, 2026 10:40:30 AM

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Good morning Commissioner Feltner.

As one of your constituents, I am concerned about a proposed rezoning PZ# 26Z00023. Manav Mandir Inc. is proposing to struct 85 townhomes behind my small home/subdivision. I have concerns that I feel need to be addressed as I viewed their preliminary site plan. I am not opposing the rezoning, but I looking for some resolutions.

Thank you for your time!

Have a wonderful day!
MaryAnna Draper
256-617-2167

Sent from my iPhone

From: [Gianella, Janette](#) on behalf of [Commissioner, D5](#)
To: [AdministrativeServices](#)
Subject: FW: rezoning White Rd. & Turtle mound
Date: Thursday, June 4, 2026 2:27:08 PM

-----Original Message-----

From: Gregg Eddie <codyeddie@icloud.com>
Sent: Thursday, June 4, 2026 2:16 PM
To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>
Subject: rezoning White Rd. & Turtle mound

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

I am totally against any rezoning at this location, traffic has become bad enough with all the building and people, please just leave it alone.

Thank you for your attention to this matter.

Margaret & Tom Eddie

From: brett fannon <brettfannon@gmail.com>
Sent: Tuesday, June 2, 2026 9:25 AM
To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>
Subject: Rezoning of 1800 Turtle mound Rd Melbourne, FL

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Good morning county commissioner,
I wanted to send you an email in regards to the rezoning of 1800 turtle mound rd, Melbourne FL. As a second generation Floridan and also was born & raised off of Lake Washington rd - the rezoning is very unwanted by the community. It is very hard to witness this beautiful town continue to be expanded as more apartments come in. Regardless of the plans for the land - whether it is rentals, apartments, condos, etc - it is not wanted. Every piece of land in this area, let alone the state of Florida does not need to be developed just because it is vacant. The traffic in Melbourne has already gotten horrible, Imagine the traffic at every four way stop off of turtle mound. We don't want the roads expanded, we like this area as is.

Please stop the rezoning of this land and please stop another apartment, rental, or building from coming into this area.

Thank you so much,
Brett Fannon
brettfannon@gmail.com

From: Dr. Garrow <drgarrow@stepaheadpodiatry.com>
Sent: Tuesday, June 9, 2026 9:55 AM
To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>
Subject: Case (26Z00008) rezoning turtlemound and white road

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

To Whom It May Concern:

As a homeowner near the intersection of Aurora Road and Turtlemound Road, I object to the rezoning of the 14 acre property at the corner of Turtlemound Road and White Road Case (26Z00008) from rural residential to commercial residential. A multi family apartment, condo or low income housing will greatly increase traffic and make a busy intersection more dangerous than it already is, affect the property value and change the character of the neighborhood.

My name is Shelly Garrow

My address is 1678 Sienna Dr Melbourne FL 32934

My phone # is 321-795-8444.

Case name/ number is Defender Homes Airway Heights LLC- Case 26Z00008

My email address is : sgarrow@stepaheadpodiatry.com

Please deny this petition.

Sincerely,

From: Michelle Tharp <teamtharp@gmail.com>
Sent: Tuesday, June 9, 2026 10:24 AM
To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>
Subject: Rezoning Case 26Z00008

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

To Whom It May Concern:

I own a home off Aurora Rd. near the intersection of Aurora Road and Turtle mound Road.

I firmly object to the rezoning of the 14 acre property at the corner of Turtle mound Road and White Road—Case 26Z00008 —from rural residential to commercial residential.

Building this kind of housing will greatly increase traffic and make the busy intersection at Turtle mound and Aurora more dangerous than it already is. It will affect the property value and is not in line with the current neighborhoods.

Please deny this petition.

Michelle Tharp Greaves
1677 Sienna Dr Melbourne FL 32934
321-480-1557.
Case name/ number is Defender Homes Airway Heights LLC- Case 26Z00008
teamtharp@gmail.com

Sent from my iPhone

From: lexee haines <lexee.haines1@gmail.com>
Sent: Sunday, June 7, 2026 11:43 AM
To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>
Subject: OPPOSED TO REZONING REQUEST

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

I am opposed to the request to change the zoning for 1800 Turtle Mound Road to RU-2-6 for the same reasons set forth in my neighbor, Scott Schiffer's, letter dated June 5, 2026.
Thank you.

From: [Don Hampton](#)
To: [Commissioner, D1](#); [Commissioner, D4](#); D2.commissioner@brevardfl.gov; [Commissioner, D3](#); [Commissioner, D5](#)
Subject: Rezoning of 1800 Turtle Mound rd. Melbourne
Date: Wednesday, June 10, 2026 8:49:52 AM

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Commissioner,

Our community needs your help in retaining our current living standards. We are not in favor of the proposed rezoning or multifamily buildings. We ask that you deny this application for 1800 Turtle Mound rd. Melbourne.

This rezoning will severely negatively impact the current area residence:

- A. Additional noise from residence, mail service, trash pick up, service trucks, etc.
- B. Much more traffic congestion, which is already over maximum capacity.
- C. Loose of Wetlands areas
- D. Additional negative stormwater drainage problems.
- E. Lower the current property values
- F. Much greater need for Police and Fire services

The closest interaction (225 ft. south) is a four way stop interaction at Aurora rd. and Turtle Mound rd. Currently at peak times it takes eight to ten minutes to pass through.

We are very strongly opposed to this rezoning and planned build.

Thank you for your consideration and assistance,
Donald and Joni Hampton
3635 Aurora rd.
Melbourne, Fl. 32934

From: Mark Harpold <mark.harpold@gmail.com>
Sent: Friday, June 5, 2026 1:05 PM
To: Prasad, Billy <Billy.Prasad@brevardfl.gov>
Subject: Case 26Z00008 and Case 26S.02

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Members of the Brevard County Planning and Zoning Board,
My name is Mark Harpold. I live at 4030 Careywood Dr. I want to share my deep concerns about the new plans for 1800 Turtle Mound Road (Case 26Z00008 and Case 26S.02). I strongly object to the changes that Defender Homes Airway Heights LLC is asking for.

Please deny the request to change this 14.37-acre property from RES 4 to RES 6, and from RR-1 to RU-2-6. This project does not fit our neighborhood. It will hurt our community in three major ways:

- **It ruins our quiet neighborhood.** Our area is a peaceful, rural community with low-density housing. Putting crowded multi-family buildings here will destroy the neighborhood character we love. It sets a bad example for future building plans.
- **It will make our roads dangerous.** Turtle Mound Road and White Road are small local roads. They cannot handle the massive amount of traffic this development will bring. More cars will cause bad traffic delays and make our streets unsafe.
- **It will cause flooding.** Our area already struggles with drainage and wetlands. Building lots of roads and roofs means rainwater cannot soak into the ground. This will cause flooding risks for nearby homes and harm our local wetlands.

Please add my letter to the official case file. I ask that you share my objections with all board members before the public hearing on June 15, 2026. Please also make sure my opposition is noted in the official meeting minutes.

Thank you for listening to the people who live here and for protecting our community.
Sincerely,

Mark Harpold
321-288-3039

mark.harpold@gmail.com

Send your objection directly to the Brevard County Planning and Zoning Board coordinator at Trina.Gilliam@BrevardFL.gov.

Subject: Formal Objection: Case 26Z00008 & Case 26S.02 – Defender Homes Airway Heights LLC

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board,

Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)

My name is, Angela Harris and I reside at 1629 Bonelli Court Melbourne FL, which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6 and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

1. Zoning Incompatibility

The surrounding area is an established lower-density rural residential community. Introducing multiple-family high-density housing directly contradicts the established neighborhood character, destroys the rural fabric of this corridor, and sets a damaging zoning precedent that will invite future high-density development throughout the area.

2. Traffic and Safety

Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create significant safety hazards for existing residents. I formally request that a comprehensive traffic impact study be required and made fully available to the public prior to any approval being considered by this Board.

3. Drainage, Wetlands, and Flooding

This sector has known and documented challenges with drainage, wetlands, and existing crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks for surrounding properties and damage sensitive local wetlands. Where applicable, Florida Department of Environmental Protection and United States Army Corps of Engineers jurisdiction over any wetlands on or adjacent to this property must be fully evaluated and disclosed before this rezoning is considered.

4. Infrastructure and Utility Capacity

The existing water, sewer, and emergency services infrastructure in this area was not designed to accommodate the demands of a high-density multi-family development. No approval should be granted without a full infrastructure capacity analysis confirming that existing systems can support this level of increased demand without negatively impacting current residents.

5. School Capacity

The addition of a high-density multi-family residential complex will place immediate and significant pressure on the enrollment capacity of local schools. The Board should require a school impact analysis prior to approval and coordinate with Brevard County Public Schools to assess whether existing facilities can absorb this growth.

6. Property Values

The proposed rezoning and resulting development will negatively impact the property values of surrounding residential homes. Residents have made long-term investments in this community based on its established rural residential character. Approving this rezoning undermines those investments and the reasonable expectations of the existing homeowners in this area.

I formally request the following:

That this objection be included in the official case file for Case 26Z00008 and Case 26S.02

That it be distributed to all Board members prior to the public hearing on June 15, 2026

That my opposition be noted in the official meeting minutes

That the Board require a full traffic impact study, infrastructure capacity analysis, school impact analysis, and wetlands evaluation before any vote is taken

That if the community has not had adequate time to organize and respond to this proposal, the Board grant a continuance to allow full public participation

Thank you for your time, service, and consideration of our community's safety, character, and integrity.

Sincerely,

Kevin Harris

1629 Bonelli Court, Melbourne FL 32934

321-223-3977

Mymellor@ yahoo .com

From: [Gianella, Janette](#) on behalf of [Commissioner, D5](#)
To: [AdministrativeServices](#)
Subject: FW: REZONING PETITION TURTLEMOUND RD.
Date: Thursday, June 4, 2026 2:32:11 PM
Attachments: [Zoning Petition.rtf](#)

-----Original Message-----

From: marianne humphrey <mahumphrey015@gmail.com>
Sent: Thursday, June 4, 2026 2:29 PM
To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>
Subject: REZONING PETITION TURTLEMOUND RD.

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

PETITION PLANNING AND ZONING COMMISSION/BOARD

Case File Number: Rezoning #26Z00008

Property Location: 1800 Turtlemound Road, Melbourne, FL 32934

Parcel Number: 27-36-14-01-00000.0-0033.01

Tax Number: 14.37 Acre - 2702763

June 3, 2026

Statement of Purpose:

We, the undersigned registered voters, property owners, and residents of Brevard County, Melbourne, FL, urge the planning and zoning commission to DENY the proposed rezoning of the aforementioned property parcel due to safety, increased traffic, congestion, water management strain, environmental impact, property value, and strain of fiscal city/county/resident finances and equestrian rights as well as our agriculture and “green” space.

1. Crime and Public Safety:

Additional low income apartment housing often correlates with increased calls for service. With the newest apartment structures already added to the area an increase of crime has already occurred IN this area.

Thus far, the Lake Washington neighborhood benefits from low crime rates still even with the increase. We are concerned about the potential rise in property crime, traffic related incidents, and overall strain on local law enforcement and the well needed other services that affect this area.

Increase in traffic flow during school bus/work commutes on Turtlemound will compound 100%! Children will not be safe.

Many of our residents have worked hard to enjoy our rural way of life, without crime, large lots, and peace mind. We are heavily taxed for our properties and want to maintain and preserve this area for what it was meant to be. We want to feel safe and chose to live in an area that provides that along with privacy. The proposed rezoning would bring more home invasions, property damage, and robberies/theft!

2. Infrastructure:

The proposed rezoning violates the once established neighborhood comprehensive plan. Where is the money coming from for necessary road expansions and improvements?

How will drainage infrastructure be upgraded and funded in this area that currently is already experiencing flooding due to many retentions ponds, poor canal maintainence, and lack of city/county response?

What is the plan and funding source for expanding police, fire, and rescue capabilities?

Will the developer cover all impact fees, or will existing taxpayers bear the burden?

This area was meant for wooded larger lots. Both deed and non-deed restricted homes where homeowners can expand and garden and enjoy wildlife. We have protected scrub-jays and tortoises all over the area.

3. Heavy traffic congestion.

It will cause an unacceptable increase in already heavy traffic congestion

The 4-way stop at Turtlemound/Lake Washington is already backed up by 15 cars. The new Amazon facility has already created major congestion through and on Eau Gallie/Turtlemound. The new Heritage Parkway has already created major congestion on Eau Gallie. The proposed apartments would clog an area that is has always been known for easy maneuvering and less congestion. This area is overcrowded now.

With the proposed amount of new people a new exit from I-95 and Lake Washington would be needed. This causes more taxation and fiscal commitment.

Most properties are septic vs. city sewer. This in itself is an issue.

4. Character and Density of the area.

This proposed rezoning is incompatible with the existing character and density of the area.

Introducing apartments into an equestrian, acreage-based neighborhood is likely to decrease property values to surrounding homes. Residents have invested significantly in maintaining the rural character of the area. Independent appraisals or studies on potential value impacts should be required. Overcrowding will reduce access and quality for existing families and equestrian activities. This will add burden to parks, businesses, medical services and emergency response. Rezoning fails to address critical infrastructure needs and poses clear risks to our quality of life, safety, and property values.

The county/city fails to maintain much of the waterways, overgrowth, streets, and signage as it is.

5. Saturated Apartment Market:

There are currently 8,000 completed apartments in Melbourne that remain unsold and empty, representing roughly 17% of all units built between 2020 and 2024.

Apartments in the general vicinity of the proposed rezoning has 5 apartment complexes already. Occupancy rate varies between 70-80%. Many offer free rent for 2 month and some pay moving expenses.

In the Palm Bay-Melbourne-Titusville area, an estimated 14.9% of apartment/housing units are unoccupied (ranking highest in US)

The Avocent - Eau Gallie East of Amazon Facility - 2 months rent free, \$500 towards moving expenses - much availability

Lake Point - Parkway/Wickham Road - 6 weeks rent free - much availability

Integra Heritage - Integra/John Rhodes - 2 months rent free - much availability

Eden Hertage Lakes - Heritage Lake Blvd - 2 months rent free - many units available
Springs Apartment - Hibiscus Blvd - \$4000 off if signed by June 30, \$3000 if after - many units available
Caribbean Isle - Wickham Road -many units available
The zoning committee needs to recognize that no more apartment housing is needed. There are plenty that remain empty as well as many incentives to draw individuals in. None are at full-capacity in the area in question!
The current zoning should be maintained! Brevard County has apartment saturation!
The builder out of Washington State is known for low-income housing.
We are against this for the type of area Lake Washington is known for.

Therefore, we respectfully request that the zoning board REJECT the application and maintain the current land use regulations for this parcel.

6/2/26-kh
CC: Rob Feltner, County Commissioner
Signatures Attached

From: sean hunt <transportersean@yahoo.com>
Sent: Tuesday, June 2, 2026 1:52 PM
To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>
Subject: Defender homes airway heights LLC - case 26Z00008

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Hello I'm formally objecting to this rezoning approval for land located at 1800 Turtle Mound. This change could allow up to 84 apartment units in an area not even remotely equipped to handle them for traffic, safety, not to mention they are incompatible with the surrounding uses. This area is a rural residential area with single family homes in mainly larger lots. Many have horse properties. The traffic on turtle mound is already very busy especially in rush hours with common accidents (I believe a serious accident happened the week of May 14th). The traffic at Aurora already backs up every daily rush hour so we cannot get out of our neighborhood with the gridlock and that's with stop signs. With lights it could be potentially worse. Additionally turtle mound is a fairly narrow two lane road. This road is not meant to handle this type of density or additional traffic. This would be a huge mistake to allow this and I hope the Planning and Zoning Board deny this rezoning request.

Sincerely,

William Sean Hunt
619-861-3578
3710 Trout Island Place
Melbourne, FL 32934

From: [Steven Jachec](#)
To: [Commissioner, D1](#); [Commissioner, D2](#); [Commissioner, D3](#); [Commissioner, D4](#)
Subject: Opposed to zoning change at 1800 Turtle Mound
Date: Saturday, June 6, 2026 9:47:29 AM

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Commissioners,

I am opposed to the request to change the zoning for 1800 Turtle Mound Road to RU-2-6 for the same reasons set forth by Scott Schiffer's letter dated June 5, 2026.

Thank you,
Steven Jachec, PhD, PE (registered Professional Engineer, Florida)

From: THOMAS JENKINS <tallenj56@gmail.com>

Sent: Thursday, June 4, 2026 5:21 PM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Subject: Fwd: Formal Objection: Case 26Z00008 & Case 26S.02--Defender Homes Airway Heights LLC

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

----- Forwarded message -----

From: THOMAS JENKINS <tallenj56@gmail.com>

Date: Thu, Jun 4, 2026 at 5:00 PM

Subject: Formal Objection: Case 26Z00008 & Case 26S.02--Defender Homes Airway Heights LLC

To: <Trina.Gilliam@brevardfl.gov>

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board,
Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)

Our names are Claire and Thomas Jenkins, and we reside at 3740 Tebaldi Pl Melbourne, FL 32934, which is located in the Veranda Place subdivision near the proposed development site. We are writing to formally register our strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. We urge the Board to deny the request to shift this property from RES 4 to RES 6 and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

1. Zoning Incompatibility

The surrounding area is an established lower-density rural residential community. Introducing multiple-family high-density housing directly contradicts the established neighborhood character, destroys the rural fabric of this corridor, and sets a damaging zoning precedent that will invite future high-density development throughout the area.

2. Traffic and Safety

Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create significant safety hazards for existing residents. We formally request that a comprehensive traffic impact study be required and made fully available to the public prior to any approval being considered by this Board.

3. Drainage, Wetlands, and Flooding

This sector has known and documented challenges with drainage, wetlands, and existing crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks for surrounding properties and damage sensitive local wetlands. Where applicable, Florida Department of Environmental Protection and United States Army Corps of Engineers jurisdiction over any wetlands on or adjacent to this property must be fully evaluated and disclosed before this rezoning is considered.

4. Infrastructure and Utility Capacity

The existing water, sewer, and emergency services infrastructure in this area was not designed to accommodate the demands of a high-density multi-family development. No approval should be granted without a full infrastructure capacity analysis confirming that existing systems can support this level of increased demand without negatively impacting current residents.

5. School Capacity

The addition of a high-density multi-family residential complex will place immediate and significant pressure on the enrollment capacity of local schools. The Board should require a school impact analysis prior to approval and coordinate with Brevard County Public Schools to assess whether existing facilities can absorb this growth.

6. Property Values

The proposed rezoning and resulting development will negatively impact the property values of surrounding residential homes. Residents have made long-term investments in this community based on its established rural residential character. Approving this rezoning undermines those investments and the reasonable expectations of the existing homeowners in this area.

We formally request the following:

That this objection be included in the official case file for Case 26Z00008 and Case 26S.02

That it be distributed to all Board members prior to the public hearing on June 15, 2026

That our opposition be noted in the official meeting minutes

That the Board require a full traffic impact study, infrastructure capacity analysis, school impact analysis, and wetlands evaluation before any vote is taken

That if the community has not had adequate time to organize and respond to this proposal, the Board grant a continuance to allow full public participation

Thank you for your time, service, and consideration of our community's safety, character, and integrity.

Sincerely,

Claire and Thomas Jenkins

3740 Tebaldi Pl. Melbourne, FL 32934

Veranda Place Subdivision

281-686-9702

tallenj56@gmail.com

From: [C.H. JONES](#)
To: [AdministrativeServices](#)
Cc: [Commissioner, D5](#)
Subject: Public Comments – Opposition to Multi-Family Development on Former Radio Station Parcel & Request for Traffic Study Data (June 15, 2026 P&Z Meeting) Item H.3 (26SS00002) and Item H.4 (26Z00008)
Date: Tuesday, June 9, 2026 3:01:15 PM

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

[P&Z Agenda Item H.3 \(26SS00002\)\(Tax Account 2702763\) \(District 5\)](#)

[P&Z Agenda Item H.4 \(26Z00008\)\(Tax Account 2702763\) \(District 5\)](#)

[Applicant: Defender Homes Airways Heights, LLC, a Washington State limited liability company](#)

Dear Brevard County Planning & Zoning Board Members:

My name is Claudia Haines Jones, and I am a resident within the Lake Washington area. I am writing to **strongly oppose** the proposed multi-family development on the former radio station parcel located near Turtle Mound Road and White Road. Based on the applications submitted by Defender Homes Airways Heights, LLC and the materials made available to the public on brevardfl.legistar.com, the proposed development is currently for development of this 14+ acre parcel for construction of manufactured homes with a proposed density of up to six (6) units per acre. Even though this parcel has never been developed, this type of development is not consistent with the rural residential character of this area. Notably, no information was provided to Staff concerning the impact to existing property values. (An analysis of impacts to existing values is required by Administrative Policy 3, Administrative Policies of the Future Land Use Element.)

I respectfully request that the Planning & Zoning Board **recommend denial** of the applications referenced above. I note in the Staff Comments to Item H.3 (26SS00002), the Staff concludes that "traffic from the proposed development will impact the surrounding area" but it is anticipated to remain within the Maximum Affected Volume (MAV). I ask that the Board require a comprehensive traffic impact study be completed and made available to the public for review before any further consideration of this project.

The scope of the existing traffic study was not disclosed to the public. My concerns include the following:

- **Lack of Adequate Traffic Analysis:** To date, there has been insufficient public information regarding the traffic impacts of a multi-family development on this site. I request that a detailed traffic study be provided to the public that includes, without limitation:
 - Existing traffic counts and Level of Service (LOS) on Turtle Mound Road, Aurora Road, Carolwood Drive, White Road and Lake Washington Road.
 - Projected trip generation on each of the roadways (referenced above) from the proposed multi-family development.
 - Analysis of cumulative peak-hour impacts to these roadways. Staff Comments included a daily average. Peak hour impacts are highly relevant.
 - Analysis of safety concerns at key intersections including: the very busy intersections of Aurora Road and Turtle Mound Road and the intersection of Turtle Mound Road and Lake Washington Road.
 - Identification of any required roadway improvements or mitigation measures. (Note:

existing stormwater drainage swales on Turtle Mound Road, Aurora Road and Lake Washington Road prevent (or severely limit) any proposed road widening.)

- **Incompatible Density:** A multi-family development of this scale would be inconsistent and grossly incompatible with the existing residential and rural character of the Lake Washington area.
- **Infrastructure and Safety Impacts:** Each of Turtle Mound Road, White Road, Aurora Road, Carolwood Drive, and Lake Washington Road are narrow, two-lane roadways that are not designed to accommodate the significant increase in daily and peak-hour traffic that would result from the proposed multi-family housing. None of these roads have shoulders. The adjoining and adjacent roadways were simply not designed to handle this level of spill over through traffic. Further, this raises serious concerns for resident safety and emergency vehicle access. (Note: there are no sidewalks on any of Turtle Mound Road, White Road, Aurora Road or Carolwood Road. Children walking to and from school bus stops are among the pedestrians on these roadways, all of which will be impacted by spill over through traffic.)
- **Preservation of Community Character:** Residents in this part of Brevard County have consistently expressed a desire to maintain the lower-density, residential nature of the Lake Washington area. Approving this rezoning would set a concerning precedent for future incompatible development, such as this project.

I urge the Planning & Zoning Board to require a full traffic impact study with the data outlined above and to recommend **denial** of the proposed multi-family development on the former radio station parcel--at a minimum--until such analysis is completed and reviewed. If, notwithstanding the absence of the requested detailed traffic impact study, the Planning & Zoning Board concludes that it has sufficient information to advance these applications, I urge you **recommend denial**. Residents choose to live in the Lake Washington area precisely because of its rural residential character. This project is clearly incompatible with the existing usages and character (negative factors expressly contemplated by Administrative Policy 3 and Administrative Policy 4), including what residents fear will be an exponential increase in the volume of traffic.

Thank you for your time and for your service on the Planning & Zoning Board.

Respectfully submitted,

Claudia Haines Jones 5325 Sand Lake Drive Melbourne, FL 32934 321-339-8901
CHJPA@proton.me

Sent with [Proton Mail](#) secure email.

Jeffrey A. Joyce

4055 Carolwood Dr
Melbourne, FL 32934
(415) 254-1258
jeff.joyce1@gmail.com

June 10, 2026

Thad Altman
150 5th Avenue, Suite D
Indiatlantic, FL 32903

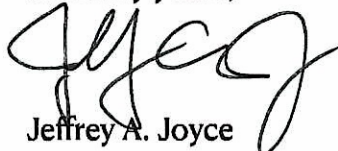
Dear Mr Altman,

I have recently been made aware of a potential rezoning of property directly adjacent to my primary residence. This has been my family's home since the mid 1980's as we moved to the equestrian area to enjoy the Brevard County countryside. Since then, the area has exploded with houses on one to two acre plots and the expanding infrastructure has not kept up. Long traffic lines at the Turtlemound Rd and Aurora Rd intersection and also on Turtlemound Rd and Lake Washington Rd intersection are frequent. A strong case could be made for a traffic light at either intersection.

The proposed rezoning at 1800 Turtlemound Road, which would allow multifamily housing well in excess of the minimum one acre lot standard, would only further exacerbate the already congested roadways. Pedestrian and bicycle traffic have also increased and the current residents now would be made much safer with a larger shoulder and/or sidewalk. The additional volume of traffic would require multi-lane roads on Turtlemound and Aurora Road(s); both of which already have strained pathways virtually incapable of being widened.

Please consider our current overburdened infrastructure and the impacts to our residents and neighborhood safety against the whims of overly ambitious developers.

Sincerely yours,



Jeffrey A. Joyce

From: [Ellie Kelly](#)
To: [AdministrativeServices](#)
Cc: [Commissioner, D2](#); [Commissioner, D3](#); [Commissioner, D4](#); [Commissioner, D5](#); [Commissioner, D1](#)
Subject: Re: Rezoning letter
Date: Monday, June 8, 2026 12:24:02 PM

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Commissioner [Altman / Adkinson / Feltner / Goodson / Delaney],

I am opposed to the request to change the zoning for 1800 Turtle Mound Rd to RU-2-6 for the same reasons set forth in my neighbor, Scott Schiffer's letter dated June 5, 2026. Thank you.

(previous email included letter from Scott Schiffer)

Eleanor M Kelly
1879 Fox Bay Dr, Melbourne, FL 32934
585-315-1342

On Mon, Jun 8, 2026 at 12:19 PM Ellie Kelly <elliekelly85@gmail.com> wrote:

Dear Commissioner [Altman / Adkinson / Feltner / Goodson / Delaney],

I write on behalf of residents of the Fox Bay community to respectfully submit the attached letter in opposition to Case Nos. 26SS00002 (Small-Scale Future Land Use Map Amendment) and 26Z00008 (Rezoning Application) concerning the property at 1800 Turtle Mound Road, Melbourne, Florida.

Our concerns relate to the proposed changes' consistency with the Brevard County Comprehensive Plan, compatibility with the established character of the surrounding neighborhood, and the adequacy of the supporting analysis in the staff report. The attached letter sets forth our objections in detail.

We appreciate the Board's consideration of our comments and respectfully request that both applications be denied. We welcome the opportunity to address the Board at the public hearing on this matter.

Respectfully submitted,

Eleanor M. Kelly
1879 Fox Bay Dr, Melbourne, FL 32934

585-315-1342

From: [Elle Kelly](#)
To: [AdministrativeServices](#)
Cc: d1.comm@brevardfl.gov; [Commissioner, D2](#); [Commissioner, D3](#); [Commissioner, D4](#); [Commissioner, D5](#)
Subject: Rezoning letter
Date: Monday, June 8, 2026 12:19:37 PM
Attachments: [Rezoning letter001.pdf](#)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Commissioner [Altman / Adkinson / Feltner / Goodson / Delaney],

I write on behalf of residents of the Fox Bay community to respectfully submit the attached letter in opposition to Case Nos. 26SS00002 (Small-Scale Future Land Use Map Amendment) and 26Z00008 (Rezoning Application) concerning the property at 1800 Turtle Mound Road, Melbourne, Florida.

Our concerns relate to the proposed changes' consistency with the Brevard County Comprehensive Plan, compatibility with the established character of the surrounding neighborhood, and the adequacy of the supporting analysis in the staff report. The attached letter sets forth our objections in detail.

We appreciate the Board's consideration of our comments and respectfully request that both applications be denied. We welcome the opportunity to address the Board at the public hearing on this matter.

Respectfully submitted,

Eleanor M. Kelly
1879 Fox Bay Dr, Melbourne, FL 32934
585-315-1342

Eleanor Kelly
Fox Bay Community Resident
1879 Fox Bay Drive
Melbourne, FL 32934
Tel.: (585) 315-1342
Email: elliekelly85@gmail.com

June 8, 2026

VIA EMAIL AND U.S. CERTIFIED MAIL RETURN RECEIPT REQUESTED

TO: Brevard County Planning & Zoning Board / Local Planning Agency
c/o Alice Randall
Administrative Services Brevard County Planning and Development Department
2725 Judge Fran Jamieson Way, Suite 114
Viera, Florida 32940
AdministrativeServices@BrevardFL.gov

AND Brevard County Board of County Commissioners
2725 Judge Fran Jamieson Way
Viera, Florida 32940

**RE: FORMAL OPPOSITION TO PROPOSED REZONING AND FUTURE LAND USE
MAP AMENDMENT Subject Property: 1800 Turtle Mound Road, Melbourne, Florida
Proposed Change: Zoning RR-1 → RU-2-6 | Future Land Use RES 4 → RES 6**

ID# 26SS00002 and 26Z00008

Dear Members of the Planning & Zoning Board and Board of County Commissioners:

I write as a homeowner and resident of the Fox Bay community, located directly across Turtle Mound Road from the above-referenced subject property (the "Subject Property"), to formally oppose the pending application to rezone the Subject Property from RR-1 (Rural Residential) to RU-2-6 (Low-Density Multiple-Family Residential) and to amend its Future Land Use Map ("FLUM") designation from RES 4 to RES 6.

I wish to be clear at the outset that I am not opposed to responsible residential development of the Subject Property. I am opposed to **RU-2-6 zoning** — a multifamily classification that goes far beyond what the surrounding neighborhood warrants, far beyond what the developer's own stated purpose requires, and far beyond what the established zoning pattern on this corridor supports.

The developer has represented that the purpose of this application is to develop a "single-family detached or single-family attached residential" community. I accept that representation. But accepting it makes the case for denial of RU-2-6 **stronger**, not weaker — because Brevard County's zoning code already provides two classifications that are fully compatible with the

surrounding neighborhood and fully adequate for the developer's stated purpose, neither of which is RU-2-6.

Those two classifications are:

- **EU-2 (Estate Use Residential)** — the **exact zoning classification of Fox Bay**, located directly across Turtle Mound Road. EU-2 produces single-family detached homes on lots as small as 9,000 square feet, with a minimum floor area of 1,500 square feet. On 14.27 acres, EU-2 zoning would support approximately 69 single-family homes — a robust, viable, and profitable development that mirrors the Fox Bay neighborhood in character, scale, and land use pattern. By contrast, the current RR-1 zoning permits a maximum of approximately 14 homes at one-acre minimum lots — meaning EU-2 would deliver five times the unit count of RR-1, without requiring the multifamily classification the developer is seeking.
- **RA-2-6 (Single-Family Attached Residential)** — the purpose-built Brevard County classification for single-family attached townhome development. RA-2-6 requires platting of individual lots and detailed site plans, permanently locking in the townhome form and preventing any future conversion to apartments. It accommodates the developer's stated townhome purpose while providing legal protection to the community.

The developer has requested neither. Instead, the developer has requested RU-2-6 — a multifamily residential classification that authorizes full apartment and condominium development, and that provides no legal guarantee that townhomes, rather than apartments, will ever be built on this site. This is acknowledged in the Staff Report for 26SS00002 where it states that while “[a]ccording to the Applicant, the intention is to develop a single-family subdivision with 86 lots with single-family detached or single-family attached residential homes ... **this representation is nonbinding on the applicant and their successors in interest.**”

The gap between what the developer says they want and what they are actually asking for is not a technicality. It is the central issue in this proceeding.

My objections, and my proposed alternatives, are set forth in full below.

I. PRELIMINARY NOTE REGARDING THE STAFF REPORT

Before turning to the substantive merits, the undersigned respectfully wishes to bring a factual matter to the Board's attention that may warrant clarification prior to the Board's deliberations.

Upon reviewing the staff report prepared for this hearing, it appears the report incorrectly describes the Subject Property as being located to the **east** of Turtle Mound Road. *See* Staff Comments, 26SS00002, p. 1; Staff Comments, 26Z00008, p. 2.¹ The Subject Property is in fact located to the **west** of Turtle Mound Road.

¹ In addition to the geographic error discussed above, the undersigned notes two further apparent typographical errors in the staff reports that, while less consequential to the substantive analysis, should be corrected in any revised

The undersigned raises this not as a criticism of staff, but out of genuine concern that this geographic error may have affected certain site-specific portions of the analysis. In particular, traffic circulation patterns and ingress/egress analysis, as well as drainage and stormwater flow analysis, are inherently dependent on the correct orientation and positioning of the subject property. If the reports' geographic description is inaccurate, those conclusions may not accurately reflect conditions at the actual site.

The undersigned respectfully requests that staff confirm the correct location of the Subject Property at the outset of the hearing, so that the Board may be satisfied that all site-specific findings in the report are grounded in the property's actual location before proceeding to deliberations.

II. BACKGROUND

The Subject Property consists of approximately 14.27 acres located at 1800 Turtle Mound Road, Melbourne, Florida, currently zoned RR-1 (Rural Residential) under Brevard County Code § 62-1336, with a Future Land Use Map designation of RES 4 (maximum 4 units per acre). The developer seeks both a rezoning to RU-2-6 and a FLUM amendment to RES 6 (maximum 6 units per acre), representing on the record that the intended use is a single-family townhome development.

The Subject Property was formerly the site of radio station WMEL-AM (920 kHz), which operated at 1800 Turtle Mound Road as a legal nonconforming use under the RR-1 zoning classification. The station's license and call sign were transferred in 2008 and the transmitter was physically relocated off-site to Eau Gallie Boulevard in Melbourne. The nonconforming use rights have been extinguished by abandonment under Florida law.

The applicant purchased this vacant property in October 2021 with full knowledge of its RR-1 zoning and RES 4 Future Land Use designation.

The Fox Bay community, located directly across Turtle Mound Road from the Subject Property, is zoned **EU-2 (Estate Use Residential)** and carries a Future Land Use Map designation of **RES 6**. Fox Bay was developed as a single-family residential neighborhood — not as a multifamily or townhome development — under those designations.

III. THE ESTABLISHED FACTS — A TALE OF TWO SIDES OF THE ROAD

Before addressing the legal and planning arguments, it is worth setting out the verified facts side by side, because they tell the story more clearly than any argument:

reports. First, the staff reports contain an incorrect plat book reference for the Subject Property, i.e., the reports cite Plat Book 8, Page 86, when the correct reference is Plat Book 6, Page 86. Second, the staff reports misidentify the Future Land Use designation for the East Surrounding Area, i.e., Fox Bay, as RES 4, when the correct designation is RES 6. The undersigned raises these errors solely to ensure the accuracy of the record and does not suggest they affect the substantive planning analysis presented in the body of this letter.

	Fox Bay	Subject Property
Side of Turtle Mound Rd	East	West
Current Zoning	EU-2	RR-1
Current FLUM	RES 6	RES 4
Proposed Zoning	—	RU-2-6
Proposed FLUM	—	RES 6
Min. Lot Size	9,000 sq ft	1 acre (RR-1)
Development Type	Single-family detached	Vacant (former radio station)

The developer is asking this Board to approve the same FLUM designation that Fox Bay carries — RES 6 — but a **fundamentally different and more intensive zoning classification** than Fox Bay has ever had. Fox Bay thrives as a single-family neighborhood under EU-2 / RES 6. The developer wants RU-2-6 / RES 6 — a multifamily classification that has nothing in common with the EU-2 zoning that governs the established neighborhood directly across the street.

IV. PRIMARY POSITION: DENY BOTH THE FLUM AMENDMENT AND THE REZONING

A. The FLUM Amendment Lacks Required Planning Justification

Under Florida law and established planning practice, a Future Land Use Map amendment must be supported by a demonstration of either a material change in conditions since the current designation was established, or a planning mistake in the original designation. The developer can demonstrate neither.

The corridor has not transformed since the current designation was established. The only change is that radio station located on the Subject Property closed approximately 18 years ago — a fact that does not constitute a changed condition sufficient to justify amending the Comprehensive Plan. The developer's desire to build more units than RES 4 allows is a business preference, not a planning justification.

The developer has designated this application as a Small-Scale Comprehensive Plan Amendment under Florida Statute § 163.3187, which applies to FLUM amendments involving 50 acres or fewer. The Subject Property at 14.27 acres qualifies under this threshold. The undersigned acknowledges that the small-scale process does not require advance transmittal to or pre-adoption review by the Florida Department of Commerce, and that this Board and the BOCC may adopt the amendment following a single public hearing without prior state approval.

The undersigned also wishes to note, for the record, that the small-scale designation does not alter the substantive planning standards this amendment must satisfy. Under Florida Statute § 163.3187(5), affected persons — including neighboring property owners such as the residents of Fox Bay — retain the right to petition the Division of Administrative Hearings within 30 days of adoption to challenge a small-scale amendment's compliance with Florida's growth management requirements. Under § 163.3187(5)(c), a small-scale amendment may not become effective until 31 days after adoption, and if timely challenged, may not become effective until the state land

planning agency or the Administration Commission issues a final order determining that the amendment is in compliance.

The undersigned raises these procedural realities not as a challenge to this Board's authority, but simply to ensure the record reflects that the residents of Fox Bay are familiar with the applicable process and intend to remain engaged throughout it. The undersigned respectfully encourages the Board to evaluate this amendment on its full planning merits, i.e., whether this amendment is consistent with Florida's growth management requirements and Brevard County's Comprehensive Plan, as the record developed in this proceeding will be the foundation for any further review.

B. The RR-1 Zoning Is Appropriate and Should Be Maintained

Under current RR-1 zoning, the minimum lot size is one acre, meaning the Subject Property's 14.27 acres can support a maximum of approximately 14 single-family homes — one per acre. That is the binding constraint of the RR-1 classification; the RES 4 Future Land Use designation sets a density ceiling of 4 units per acre, but the RR-1 zoning is the more restrictive standard and controls. Fourteen single-family homes on 14.27 acres is a low-density, rural residential outcome — precisely what the RR-1 classification was designed to produce, and precisely what the surrounding corridor reflects. The developer purchased this property knowing its designations. Self-created hardship — acquiring land at a price that only produces a return if more favorable zoning is granted — is not a valid basis for a rezoning under Florida law. The fact that 14 homes may be less profitable than 84 units is the developer's problem, not this community's problem to solve through a rezoning.

C. The Abandoned Nonconforming Use Provides No Basis for Upzoning

Radio station WMEL-AM operated at 1800 Turtle Mound Road as a legal nonconforming use. When the license was transferred in 2008 and the transmitter relocated off-site, the nonconforming use was permanently abandoned. The prior commercial broadcast use cannot be relied upon to justify greater residential intensity. If anything, its elimination is an opportunity to bring the Subject Property into full conformity with the surrounding residential character — not to exploit its prior nonconformity as a pretext for upzoning.

V. FIRST ALTERNATIVE: IF ANY CHANGES ARE CONSIDERED, APPROVE RES 6 FLUM ONLY WITH EU-2 ZONING

If this Board is inclined to consider any changes at all, the **first and most appropriate alternative** is to approve a FLUM amendment to RES 6 — acknowledging the existing RES 6 designation on the Fox Bay side of the road — but to pair that amendment exclusively with **EU-2 zoning**, mirroring the established classification of Fox Bay.

A. EU-2 Is the Exact Zoning of Fox Bay

EU-2 is not a novel or experimental zoning classification for this corridor. It is exactly what Fox Bay is zoned today. Applying EU-2 to the Subject Property would produce a development that is, by definition, compatible with the established neighborhood standard — because it would be

governed by the same rules, the same minimum lot sizes, the same setbacks, and the same permitted uses that govern every lot in Fox Bay.

Under EU-2 zoning, the Subject Property could support approximately 69 single-family detached homes on 9,000 square foot minimum lots across 14.27 acres. That is a robust, viable development — representing a six-fold increase over the 14 homes currently permissible under RR-1 zoning, and perfectly matched to the Fox Bay neighborhood pattern.

B. EU-2 Is More Protective Than Any Other Alternative

EU-2 is the most neighborhood-protective zoning alternative available, for three reasons:

First, it **permits only single-family detached dwellings** — there is no path to apartments, condominiums, or even townhomes under EU-2. The development form is permanently locked in as individual homes on individual lots, indistinguishable in character from Fox Bay.

Second, it **requires a minimum floor area of 1,500 square feet** per dwelling unit, ensuring that any homes built are of meaningful size and quality consistent with the existing neighborhood.

Third, it **carries a maximum building height of 35 feet**, consistent with the residential scale of Fox Bay and preventing the multi-story building forms that multifamily development can produce.

C. If the Developer Refuses EU-2, That Refusal Is Itself Telling

This Board should put the question directly to the developer on the record: *Will you accept EU-2 zoning — the same classification as Fox Bay — in lieu of RU-2-6?*

EU-2 would allow the developer to build approximately 69 single-family homes on this site under a RES 6 FLUM — a fully viable and profitable project by any standard. If the developer refuses EU-2, they have refused the exact zoning of the neighborhood directly across the street. That refusal tells this Board everything it needs to know about the true intent behind this application.

VI. SECOND ALTERNATIVE: IF EU-2 IS NOT ACCEPTED, CONSIDER RA-2-6 WITH A BINDING DEVELOPMENT PLAN

If this Board concludes that the developer's stated townhome purpose has independent merit that EU-2 cannot accommodate, the **second alternative** is to consider **RA-2-6 (Single-Family Attached Residential)** — the purpose-built Brevard County classification for townhome development — paired with a Binding Development Plan.

A. RA-2-6 Is the Correct Classification for Townhomes — Not RU-2-6

Brevard County Code § 62-1343 establishes the RA-2 series of zoning classifications specifically and exclusively for single-family attached residential development — the legal planning term for townhomes. The RA-2 classifications were designed precisely for this use. They require platting

of individual lots and detailed site plans tailored to townhome communities. They produce exactly what the developer says they want to build.

The developer has not requested RA-2-6. The developer has requested **RU-2-6 — a multifamily residential classification** that encompasses full apartment and condominium development. This appears to be a deliberate choice to obtain a classification that authorizes far more than townhome development requires or justifies.

B. The Critical Difference Between RU-2-6 and RA-2-6

The difference is fundamental, not semantic:

RU-2-6 (what the developer requests):

- A multifamily residential classification
- Permits full apartment buildings and condominium complexes as of right
- Permits townhomes as one option among many, with no requirement that they be built
- Carries no platting requirement that permanently locks in a townhome pattern
- Runs with the land — any future owner can build apartments without returning to this Board
- Permits building heights up to 45 feet when abutting comparable classifications

RA-2-6 (the townhome classification):

- A single-family attached residential classification designed exclusively for townhomes
- Permits only single-family attached dwellings — no apartments, no multifamily complexes
- Requires platting of individual lots — each unit is permanently locked in as a for-sale home
- Requires detailed site plan submitted simultaneously with platting
- Permanently prevents conversion to apartments regardless of future ownership
- Provides the neighborhood-protective development standards appropriate to townhome communities

If the developer's representation about townhomes is genuine, RA-2-6 gives them everything they need. The only thing RA-2-6 denies them is the future option of building apartments — and if they truly intend only townhomes, that should be no loss at all.

C. Required Conditions If RA-2-6 Is Considered

If this Board considers RA-2-6 as an alternative, the following minimum conditions should be required through a **Binding Development Plan**, enforceable against all future owners:

1. Maximum unit count not to exceed the density supportable under RES 6 at 6 units per acre
2. Maximum building height of 35 feet, consistent with EU-2 and the Fox Bay neighborhood scale
3. Minimum unit floor area of 1,500 square feet, consistent with EU-2 standards
4. Landscaping and buffering standards along the Turtle Mound Road frontage

5. A traffic impact study demonstrating that Turtle Mound Road can accommodate the development
6. Confirmation of adequate water, sewer, and infrastructure capacity

D. If the Developer Refuses RA-2-6 As Well, the Application Must Be Denied

If the developer rejects both EU-2 and RA-2-6 — the two classifications that are genuinely appropriate for this site and this neighborhood — this Board will have its answer. A developer who refuses the zoning classification of the neighboring community (EU-2) and the purpose-built townhome classification (RA-2-6) in favor of a multifamily classification (RU-2-6) is not planning a townhome community. They are preserving maximum future flexibility for the most intensive development this corridor has ever seen. This Board should deny the application in its entirety if that is the developer's position.

VII. RU-2-6 MUST BE DENIED UNDER ANY CIRCUMSTANCES

Regardless of what this Board decides on the FLUM amendment, and regardless of the developer's representations about townhomes, the rezoning to **RU-2-6 must be denied** for the following independent and cumulative reasons:

1. **It is the wrong classification.** RU-2-6 is a multifamily classification. EU-2 and RA-2-6 are the appropriate classifications for this site. There is no legitimate planning reason to grant a multifamily classification when single-family alternatives are fully adequate for the stated purpose.
2. **It provides no neighborhood protection.** A developer's verbal representation of townhome intent is not binding on future owners. Once RU-2-6 is on the books, apartments are permitted as of right — forever.
3. **It is incompatible with the established neighborhood zoning pattern.** Fox Bay — directly across the street — is EU-2. RU-2-6 is a fundamentally different and more intensive classification with no precedent on this corridor.
4. **It sets a dangerous corridor-wide precedent.** Approving RU-2-6 under RES 6 Future Land Use on this site could be used to justify multifamily rezoning applications throughout the Turtle Mound corridor.
5. **It exceeds the developer's stated purpose.** The developer says they want townhomes. RA-2-6 delivers townhomes. EU-2 delivers single-family homes. RU-2-6 delivers everything up to and including full apartment complexes. The excess is unexplained and unjustified.

VIII. INFRASTRUCTURE, TRAFFIC, AND PUBLIC SERVICES

A. Traffic Impact — No Study Has Been Submitted

It appears that the application has not been accompanied by a comprehensive traffic impact study. Regardless of whether the proposed development is apartments, townhomes, or single-family

homes — any significant residential development on a currently vacant 14-acre parcel requires this analysis. Before any rezoning or FLUM amendment is approved, the Board should require answers to the following questions on the record:

- What is the projected daily and peak-hour vehicle trip generation from the proposed development?
- Can Turtle Mound Road safely accommodate that volume, particularly at its intersections with Wickham Road, Aurora Road, and Eau Gallie Boulevard?

The absence of a traffic impact study is itself an independent basis for deferring or denying this application.

B. Potable Water and Sanitary Sewer — The Staff Report Confirms Capacity Has Not Been Verified

This is not a concern raised only by neighboring property owners. It is a deficiency identified by the **county's own staff**, in the staff report submitted for this hearing. The staff report states, in relevant part:

"The proposed development is within access to centralized sewer and centralized water from the City of Melbourne Utilities. However, the applicant has not submitted acknowledgement letters from the City of Melbourne to verify they have the capacity to provide service."

And further:

"Centralized public water service is within the boundaries of the property, and the applicant's request equals a density of 6 units per acre. The applicant has not provided acknowledgement letters from the City of Melbourne to verify that they have the capacity and availability to provide potable water and sanitary sewer to the proposed development."

These findings by county staff are unambiguous: the developer has not confirmed that the City of Melbourne can serve this project. This Board is being asked to approve a rezoning and FLUM amendment for a development whose utility feasibility has not been verified by the only entity capable of verifying it — the City of Melbourne itself.

Access is not capacity. The staff report confirms that centralized water and sewer are within access of or within the boundaries of the property. But the presence of a water main or sewer line near a property does not mean the municipal system has the capacity to serve 84 new residential connections at the requested density of 6 units per acre. Capacity is a separate and independent question — one that only the City of Melbourne can answer, and one that the developer has not asked them to answer.

This is a Florida concurrency requirement. Florida's Growth Management Act — Chapter 163, Florida Statutes — establishes the doctrine of concurrency: public infrastructure and services must be available concurrent with the impacts of new development. Potable water and sanitary sewer are among the core concurrency requirements under Florida law. A development cannot

responsibly be approved if adequate utility capacity has not been confirmed. The developer's failure to obtain acknowledgement letters from the City of Melbourne is not a minor paperwork deficiency — it is a failure to satisfy a fundamental prerequisite for development approval under Florida law.

The developer has not done basic due diligence. Filing a rezoning and FLUM amendment application without first confirming that the utility provider can serve the proposed project is not responsible development practice. This Board should not be placed in the position of approving a zoning entitlement whose utility feasibility is unconfirmed. The burden is on the developer — not the county and not the neighboring community — to demonstrate that this project can be served before asking for a rezoning.

Capacity verification must await resolution of the environmental constraints. As detailed in Section IX of this letter, the county's own NRM staff has identified significant wetland and SFHA constraints that may reduce the net buildable area of the Subject Property to a fraction of the 14.27-acre gross figure used in the developer's density calculations. The achievable unit count after accounting for those constraints may be substantially lower than 84 units. Utility capacity should be verified for the **net achievable density** — not for a gross acreage-based figure that the environmental constraints may make impossible to realize. Verifying capacity for 84 units before the wetland delineation and SFHA analysis are complete risks producing a misleading capacity determination that does not reflect what can actually be built on this site.

This Board should require — before taking any action on this application — written acknowledgement letters from the City of Melbourne Utilities confirming:

1. The available capacity of the City's water distribution system to serve the proposed development at the requested density of 6 units per acre on 14.27 gross acres.
2. The available capacity of the City's sanitary sewer collection and treatment system to serve the proposed development at the requested density.
3. The conditions, if any, under which the City will provide service — including any required infrastructure improvements, capacity reservation fees, or connection moratoriums that may affect project feasibility.
4. Whether the City's capacity confirmation is contingent on a specific unit count, and if so, whether a revised unit count resulting from environmental constraint analysis would require a new capacity determination.

The absence of these letters is an independent and sufficient basis for deferring this application until they are obtained and reviewed.

IX. ENVIRONMENTAL CONSTRAINTS, DRAINAGE, STORMWATER, AND CROWN ELEVATION IMPACTS

The environmental and drainage constraints affecting the Subject Property represent what may be the single most powerful independent basis for denial of this application — and critically, these constraints are not asserted only by neighboring property owners. They are identified in the **county's own staff report**, through comments submitted by Brevard County's Natural Resources

Management (NRM) department. The NRM comments confirm that this property is subject to a constellation of overlapping environmental and floodplain regulations that severely limit what can lawfully be built here — and that the developer has submitted no analysis demonstrating the proposed density is achievable within those constraints.

This Board should give the NRM comments their full weight. They are not the opinion of an objecting neighbor. They are the professional findings of the county's own environmental staff, and they raise fundamental questions about whether this project can be built at all at the density requested — questions that must be answered before any rezoning or FLUM amendment is approved.

A. The Staff Report's Own NRM Comments Confirm the Property Is Severely Constrained

The staff report submitted for this hearing contains the following findings from Brevard County's Natural Resources Management department, quoted directly:

"NRM comments identify several environmental and floodplain development constraints affecting the subject property. Pursuant to Section 62-3694(c)(1), residential land uses within wetlands are limited to no more than one (1) dwelling unit per five (5) acres. For subdivisions and multi-family developments exceeding five acres in size, Section 62-3694(c)(6) allows this limitation to be applied as a maximum percentage, restricting cumulative wetland impacts to no more than 1.8% of the total non-commercial and non-industrial acreage. Additionally, a majority of the property is located within a FEMA-designated Special Flood Hazard Area (SFHA A), as identified on the FEMA Flood Insurance Rate Map. Pursuant to Section 62-3724(3)(d), compensatory storage is required for fill exceeding that necessary to establish an upland buildable area greater than one-third (1/3) acre within the isolated floodplain. Chapter 62, Article X, Division 6 further provides that 'No site alteration shall adversely affect the existing surface water flow pattern,' while Section 62-3723(2) requires that development within floodplain areas not adversely impact adjoining properties."

This Board's own staff has identified five distinct and overlapping regulatory constraints on this property. The undersigned addresses each in turn below — and urges this Board to recognize that together, they raise a threshold question that must be answered before any rezoning is granted: **can this project actually be built at the requested density under applicable environmental law?**

B. Wetland Density Limitation — § 62-3694(c)(1) and (c)(6)

Section 62-3694(c)(1) limits residential land uses within wetlands to no more than one dwelling unit per five acres. On the Subject Property's 14.27 gross acres, if the entirety were wetland, the maximum permitted residential density under this provision would be approximately two to three dwelling units — not the 57 to 84 units the developer's application contemplates.

The staff report acknowledges the multifamily exception under § 62-3694(c)(6), which for subdivisions and multifamily developments exceeding five acres permits the wetland limitation to be applied as a maximum percentage, restricting cumulative wetland impacts to no more than 1.8% of the total non-commercial and non-industrial acreage. On 14.27 acres, 1.8% equals

approximately 0.257 acres — less than one-quarter of an acre of total permitted wetland impact across the entire development.

This constraint is of profound significance for the density analysis underlying this application. The developer's stated unit counts — whether up to 84 under the proposed RES 6, or the up to 57 units theoretically permitted under RES 4 FLUM density if zoning were changed to accommodate it (noting that RR-1 zoning itself limits the property to approximately 14 homes) — are calculated on the basis of gross acreage. They do not account for the reduction in net buildable area caused by wetland constraints. If the Subject Property contains significant wetland acreage — and the fact that NRM raised § 62-3694 strongly suggests it does — the actual buildable upland area available for development may be a small fraction of the 14.27-acre gross figure.

The developer has submitted no wetland delineation, no environmental survey, and no analysis of how the wetland density limitation affects the achievable unit count on this property. Until a formal wetland delineation is prepared by a qualified environmental consultant, reviewed by NRM, and incorporated into the density analysis, the unit counts presented to this Board are speculative and unreliable. This Board cannot responsibly approve a rezoning based on a density assumption that has not been tested against the wetland constraints the county's own staff has identified.

C. FEMA Special Flood Hazard Area — Zone A Covers a Majority of the Property

The NRM comments confirm that a majority of the Subject Property is located within a FEMA-designated Special Flood Hazard Area, Zone A. This is not a peripheral or minor constraint — it covers most of the site. The implications are severe and multi-layered:

- The property has a 1% annual chance of flooding — the so-called 100-year flood — and a 26% chance of flooding over the life of a 30-year mortgage
- All new construction must be elevated to or above the applicable Base Flood Elevation (BFE), requiring substantial fill across most of the site
- Flood insurance will be mandatory for any mortgage-financed purchase of units on this property, adding a recurring cost burden that affects marketability and affordability
- The Zone A designation triggers the compensatory storage requirement addressed in Sub-argument D below
- Combined with the wetland constraints identified in Sub-argument B, the SFHA coverage dramatically reduces the net area of the property that can be developed without regulatory conflict

The developer has submitted no FEMA flood zone analysis, no Base Flood Elevation determination, and no assessment of the finished floor elevation requirements that will govern construction. This information is essential to any honest evaluation of what can be built on this property and at what density.

D. Compensatory Storage Requirement — § 62-3724(3)(d) — A Potential Engineering Impossibility at the Requested Density

This is among the most technically significant constraints identified by NRM. Section 62-3724(3)(d) requires compensatory storage for fill exceeding that necessary to establish an upland buildable area greater than one-third (1/3) acre within the isolated floodplain. In plain terms: every cubic yard of fill the developer places within the SFHA beyond what is needed to create a one-third acre upland pad must be offset by an equal volume of compensatory stormwater storage elsewhere on the site.

The practical consequence on this property is potentially crippling to the developer's density ambitions. Consider the sequence:

- A majority of the site is in Zone A SFHA, meaning most of the site requires fill to achieve FEMA-required finished floor elevations.
- The more the developer fills, the more compensatory storage volume they must provide.
- Compensatory storage requires land — typically in the form of detention or retention ponds.
- But the wetland impact limitation of § 62-3694(c)(6) restricts the developer to disturbing no more than 0.257 acres of wetland total.
- And the SFHA coverage means that much of the remaining land is also constrained.

This creates a regulatory circularity: the developer needs fill to build, but fill requires compensatory storage, but compensatory storage requires land, but the available land is constrained by wetlands and SFHA coverage. The net result may be that even the lesser density of 14 to 84 units contemplated under various zoning scenarios is physically unachievable on this site at the upper ranges under applicable environmental regulations — regardless of what zoning classification this Board approves.

The developer has submitted no compensatory storage calculations, no floodplain fill volume analysis, and no engineering demonstration that the site can accommodate both the proposed development footprint and the compensatory storage volumes required by § 62-3724(3)(d). Approving a rezoning based on a density assumption that has not been tested against this constraint is not responsible land use planning — it is granting a zoning entitlement that may never be exercised because the project cannot be engineered to comply with existing law.

E. Prohibition on Adverse Alteration of Surface Water Flow — Chapter 62, Article X, Division 6

The staff report quotes Brevard County Code directly: "**No site alteration shall adversely affect the existing surface water flow pattern.**" This is an absolute prohibition — not a standard to be balanced, mitigated, or traded off, but a flat and unconditional requirement.

On a property where a majority of the land is in Zone A SFHA and significant wetlands are present, the existing surface water flow pattern almost certainly reflects the natural sheet flow, infiltration, and detention functions that the wetlands and floodplain provide. **This is not idle land — it is**

land that performs an active stormwater management function for the surrounding area, including Turtle Mound Road and the Fox Bay community to the east. Development that fills, grades, and covers this land with impervious surfaces — rooftops, driveways, internal roads, parking areas — will by definition alter those flow patterns.

This prohibition directly reinforces the crown elevation concerns raised throughout this letter. If the natural flow pattern currently moves water away from Fox Bay, holds it on the Subject Property, or disperses it through wetland infiltration, development that redirects that flow toward Turtle Mound Road and the Fox Bay community is a direct and unambiguous violation of Brevard County Code. The developer has submitted no surface water flow analysis, no pre-development drainage pattern mapping, and no post-development flow comparison. This Board should not approve development on a site with this level of environmental constraint without that analysis firmly in hand.

F. Prohibition on Adverse Impact to Adjoining Properties Within the Floodplain — § 62-3723(2)

Section 62-3723(2) requires that **development within floodplain areas not adversely impact adjoining properties.** The staff report confirms the Subject Property is predominantly within a SFHA. Fox Bay is the adjoining property. The legal obligation to protect Fox Bay from adverse floodplain development impacts is therefore not merely a general planning consideration — it is a specific, enforceable code requirement that applies directly to any development on this site.

Any development on a predominantly SFHA parcel that increases flood risk to adjoining properties, redirects stormwater toward those properties, reduces the natural floodplain storage capacity of the site, or accelerates runoff across Turtle Mound Road toward Fox Bay is a direct violation of § 62-3723(2). The burden is on the developer to demonstrate compliance — with engineering, not promises. That demonstration has not been made.

G. Crown Elevation and the 25-Year Flood Stage Standard — § 62-3756

Brevard County Code § 62-3756 mandates that streets shall be designed so that the lowest crown elevation is at or above the 25-year peak flood stage. Given that a majority of the Subject Property is in Zone A SFHA, the relationship between the proposed development's finished grades, the crown elevation of Turtle Mound Road, and the grades within Fox Bay is a critical engineering variable. If development fill raises the western side of Turtle Mound Road's drainage corridor while Fox Bay's eastern side remains at natural grade, stormwater that previously dispersed across the Subject Property may be redirected eastward across Turtle Mound Road into Fox Bay — directly increasing flood risk for Fox Bay homeowners in violation of both § 62-3756 and § 62-3723(2).

This concern is not speculative. It is the predictable consequence of filling a predominantly SFHA parcel adjacent to an existing residential community, and it is precisely the kind of impact that § 62-3723(2) and the surface water flow prohibition of Chapter 62, Article X, Division 6 are designed to prevent. No engineering analysis addressing this risk has been submitted with this application.

H. The Impervious Surface Problem — Compounding an Already Constrained Site

The Subject Property is currently vacant land — a stormwater absorption area with no significant impervious surfaces, performing a natural detention function that benefits the surrounding corridor. A development of even 14 to 84 residential units — depending on the zoning classification ultimately applied — will introduce substantial impervious coverage: rooftops, driveways, internal roads, sidewalks, and common area paving. Brevard County Code requires that post-development stormwater runoff rates not exceed pre-development rates. On a site where the pre-development condition includes significant wetlands and SFHA floodplain performing active natural stormwater functions, the baseline for this comparison is not zero — it is the substantial natural stormwater management capacity of the existing site. The developer must demonstrate that the proposed development can achieve a runoff-neutral outcome against that baseline. No such demonstration has been made.

I. The SJRWMD Environmental Resource Permit — A Separate Regulatory Gauntlet

Any stormwater management system serving this development should require an Environmental Resource Permit (ERP) from the St. Johns River Water Management District (SJRWMD) — a separate regulatory approval process entirely independent of the county's rezoning and site plan review. SJRWMD ERP review will scrutinize the wetland impacts, compensatory storage volumes, stormwater treatment design, and Indian River Lagoon water quality protection measures in detail. Given the site's documented wetland constraints, SFHA coverage, and shallow water table (2 to 8 feet in this region), SJRWMD ERP approval at the requested density is far from guaranteed. This Board should not approve a rezoning that assumes a density the SJRWMD permitting process may not allow.

J. The Overarching Conclusion: This Application Is Premature

The NRM comments in the staff report do not merely raise concerns about how this development should be designed. They raise a threshold question about whether this development can be built at the requested density at all under applicable environmental law. The convergence of wetland density limitations, SFHA compensatory storage requirements, surface water flow prohibitions, and adjoining property protection requirements may render the developer's proposed unit counts physically and legally unachievable on this site — regardless of what zoning classification this Board approves.

Granting a rezoning and FLUM amendment based on density assumptions that have not been tested against these constraints is putting the cart before the horse. It grants the developer a zoning entitlement worth substantial money while leaving the environmental questions to be resolved — or not — at site plan review, by which time the rezoning is already approved and the county's leverage to require meaningful project changes is severely diminished.

The right sequence is the reverse: resolve the environmental constraints first, determine the net buildable area and achievable density under applicable law, and then evaluate whether a rezoning and FLUM amendment are warranted for a project that can actually be built. The current application inverts that sequence to the developer's advantage and the community's detriment.

L. Minimum Documentation Required Before Any Approval

The undersigned respectfully urges this Board to require — as a condition of any further consideration of this application — the following documentation, each prepared by a qualified professional and reviewed by the appropriate county departments:

1. A **formal wetland delineation** prepared by a qualified environmental consultant and reviewed by NRM, identifying the precise acreage and location of all wetlands on the Subject Property and the resulting net buildable upland area available for development within the § 62-3694(c)(6) wetland impact limitation.
2. A **FEMA flood zone and Base Flood Elevation analysis** confirming the Subject Property's SFHA boundaries, applicable BFEs, and the finished floor elevation requirements that will govern construction.
3. A **compensatory storage analysis** prepared by a Florida-licensed professional engineer, calculating the fill volumes required to achieve FEMA-compliant finished floor elevations and the corresponding compensatory storage volumes required under § 62-3724(3)(d), and demonstrating that adequate land exists on the site to accommodate both development and compensatory storage at the proposed density.
4. A **surface water flow analysis** demonstrating that the proposed development will not adversely affect existing surface water flow patterns in violation of Chapter 62, Article X, Division 6, including a specific analysis of the crown elevation relationship between the Subject Property, Turtle Mound Road, and the Fox Bay community.
5. A **floodplain impact analysis** demonstrating that the proposed development will not adversely impact the adjoining Fox Bay community in violation of § 62-3723(2), including pre- and post-development flood surface comparisons.
6. A **stormwater management plan** demonstrating that post-development runoff rates will not exceed pre-development rates, accounting for the natural stormwater detention function currently performed by the site's wetlands and floodplain areas.
7. A **preliminary SJRWMD ERP feasibility assessment** confirming that the proposed development density and form can be engineered to meet SJRWMD Environmental Resource Permit requirements.

The absence of any of these studies in the current application is not a minor procedural gap. It is a fundamental failure to demonstrate that this development can be built without violating applicable environmental law, harming the Fox Bay community, or damaging the Indian River Lagoon. This application should not proceed until these questions are answered.

X. SUMMARY OF POSITIONS

To assist this Board in evaluating the arguments set forth above, I summarize my positions as follows:

Primary Position — Deny Both: Deny the FLUM amendment (RES 4 → RES 6) and deny the rezoning (RR-1 → RU-2-6). The current RR-1 zoning limits the property to approximately 14 single-family homes on one-acre lots — the appropriate, rural-residential outcome for this

corridor. The developer created its own hardship by purchasing land with knowledge of its zoning, and no changed conditions justify amending the Comprehensive Plan. The proposed six-fold density increase from 14 to 84 units is not a planning decision — it is a profit maximization decision, and it is not this community's burden to bear.

First Alternative — RES 6 FLUM with EU-2 Zoning: If any changes are considered, approve a FLUM amendment to RES 6 only if paired with EU-2 zoning — the exact classification of Fox Bay — producing single-family detached homes at a scale and character fully compatible with the established neighborhood. Ask the developer on the record whether they will accept EU-2. Their answer will be instructive.

Second Alternative — RES 6 FLUM with RA-2-6 Zoning and a Binding Development Plan: If EU-2 is not accepted, consider RA-2-6 zoning — the purpose-built townhome classification — paired with a Binding Development Plan specifying maximum unit count, maximum building height of 35 feet, minimum floor area of 1,500 square feet, traffic impact study requirements, and infrastructure capacity confirmation. Ask the developer on the record whether they will accept RA-2-6. Their answer will be equally instructive.

Absolute Red Line — Deny RU-2-6 Under Any Circumstances: RU-2-6 is the wrong classification for this site, provides no neighborhood protection, is incompatible with the EU-2 zoning of Fox Bay directly across the street, exceeds the developer's stated purpose, and sets a precedent that threatens the character of the entire Turtle Mound Road corridor. It must be denied regardless of what this Board decides on the FLUM amendment or on the alternative zoning classifications.

Threshold Requirement — Defer Any Action Until Minimum Submissions Are Complete: Regardless of the Board's ultimate position on the merits, this application should not be approved — or even fully deliberated — until the following minimum submissions have been received and reviewed by appropriate county staff: (1) written acknowledgement letters from the City of Melbourne Utilities confirming water and sewer capacity at the proposed density, as identified as missing in the staff report; (2) a formal wetland delineation reviewed by NRM; (3) a FEMA Base Flood Elevation determination and compensatory storage analysis; (4) a surface water flow and floodplain impact analysis demonstrating no adverse effect on Fox Bay; (5) a traffic impact study; and (6) a preliminary SJRWMD ERP feasibility assessment. The staff report itself identifies several of these as missing. This Board should not approve a rezoning whose environmental, utility, and traffic feasibility is unverified.

XI. CONCLUSION AND REQUEST FOR DENIAL

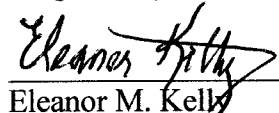
For all of the reasons set forth above, I respectfully but firmly urge this Board to recommend **denial** of the proposed rezoning from RR-1 to RU-2-6, and **denial** of the proposed FLUM amendment from RES 4 to RES 6, with the alternative positions set forth in Section X above available to this Board if it concludes that some form of development accommodation is warranted.

I respectfully request that this letter be made part of the official record of the proceedings concerning the Subject Property. I also request written notification of the date and time of any public hearing at which this application will be considered, and I intend to appear and testify in opposition at that hearing.

I further encourage my neighbors in the Fox Bay community and all affected property owners within 500 feet of the Subject Property to submit their own written opposition and to attend the public hearing. The Fox Bay community's EU-2 zoning and RES 6 FLUM designation give every Fox Bay homeowner a direct and personal stake in how this Board resolves the question of what RES 6 zoning means on Turtle Mound Road.

Thank you for your consideration.

Respectfully submitted,



Eleanor M. Kelly
Fox Bay Community Resident
1879 Fox Bay Drive
Melbourne, FL 32934
Tel.: (585) 315-1342
Email: elliekelly85@gmail.com

cc: *Commissioner Kim Adkinson, Brevard County Commission District 3, 2725 Judge Fran Jamieson Way, Viera, Florida 32940, D3.Commissioner@BrevardFL.gov*

Commissioner Thad Altman, Chair, District 5 Brevard County Board of County Commissioners, 2725 Judge Fran Jamieson Way, Viera, Florida 32940 D5.Commissioner@BrevardFL.gov

Commissioner Katie Delaney, District 1 Brevard County Board of County Commissioners, 2725 Judge Fran Jamieson Way, Viera, Florida 32940, D1.Commissioner@BrevardFL.gov

Commissioner Tom Goodson, District 2 Brevard County Board of County Commissioners, 2725 Judge Fran Jamieson Way, Viera, Florida 32940, D2.Commissioner@BrevardFL.gov

Commissioner Rob Feltner, District 4 Brevard County Board of County Commissioners, 2725 Judge Fran Jamieson Way, Viera, Florida 32940, D4.Commissioner@BrevardFL.gov

NOTE: This letter is submitted in opposition to the pending rezoning and FLUM amendment application ID# 26SS00002 and 26Z00008. The undersigned reserves the right to supplement this

letter with additional arguments, evidence, and testimony prior to and at any public hearing on this matter. Nothing in this letter should be construed as a waiver of any legal rights or remedies available to the undersigned or other affected property owners, including without limitation the right to file a petition with the Division of Administrative Hearings pursuant to Florida Statute § 163.3187(5) within 30 days of any adoption of a small-scale FLUM amendment by the Board of County Commissioners, and to seek a stay of effectiveness of any such amendment during the pendency of such a challenge.

From: Karin Kendust <karin.kendust@gmail.com>
Sent: Friday, June 5, 2026 8:53 AM
To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>
Subject: Proposed zoning issue

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

My name is Karin Kendust
4548 Deerwood Trail, Melbourne, FL 32934.
Regarding: The Rezoning Notice 26Z00008. {Public Hearing, 3 PM, June 15, 2026
I am writing to object to the proposed zoning change to RU-2-6 from RR-1 on a 14 acre parcel of property just North of Aurora Road and West of Turtlemound and known as the old WMEL radio station property. This developer is not from around here. He is from Washington state. He has no stake in this other than to make money. He knows nothing of the lifestyle of the Lake Washington area.
Please do not pass this zoning change request.
Please consider the following:

TRAFFIC ISSUE

The access to and from this property will be on to Turtlemound Road, very near the intersection of Turtlemound Road and Aurora Road (southbound). There is a four way stop sign that continues to get very backed up at all hours of the day but especially in the morning and afternoon as commuters and school children are making their way to work and school. It is not unusual to see 15 or more cars backed up at all 4 stop sign. Couple this with the traffic heading west from Turtlemound has a turn lane so double the cars exiting there. As it is now since the opening of Turtlemound at Eau Gallie Blvd., it has become worse.

If they are traveling North on Turtlemound road, there is a second four way stop sign (Lake Washington Road Intersection) with much the same scenario.

Turtlemound road already handles an excessive amount of traffic from commuters "cutting through" from Eau Gallie Blvd. to Post Road to get to the Post/Wickham (and in reverse to get from Post to EG) intersection and avoid traffic from EG to Post on Wickham road. Speeds in this area tend to be regularly faster than is legal and it has already become a hazard. IT has become a hazard already. I rarely see horses being ridden like I did (myself included) 15 or more years ago. It's not safe. Traffic is already TOO much.

PROPERTY VALUE

Please, please consider the impact of property values that will undoubtedly lower because of this multi-family development. When our street (Deerwood Trail) and the next street were annexed into the City of Melbourne 10 or so years ago, it was done so to obtain "city" water. It benefitted both the City of Melbourne and the residents. IT very positively impacted Property Value and it was done expressly with the requirement that the City of Melbourne create a zoning that was the same as we had with the County. It allowed for horses, some farm animals, keeping your RV and boat on your

property and such. If it benefits the area and impacts in a positive way, that is one thing. This is not a positive..

DRAINAGE

We have long-standing drainage issues in the area. Especially during the Hurricane/rainy season. This will again negatively impact this.

WILDLIFE ISSUE

I have lived in Lake Washington for 38 years. The majority of our neighbors in and around the Lake Washington area are long term or Permanent residents who have moved out there to enjoy the quiet lifestyle and wildlife. Most of us have intentionally left a large portion of our property wild to encourage wildlife to safely remain in the area. We are very protective of the area wildlife. In a regular week, many of us stop to allow wildlife to cross the road, build owl houses and leave wild areas for them. Developing this 14 acre tract for the purpose of multi housing would be a huge mistake and a disservice to the lifestyle that so many residents are here for. Please save this kind of development for the major roadways and areas that were intended for this. Not a quiet country area. Just to name a few we have: Generally a new "subdivision" comes in and it's cheaper to completely strip the land rather than leave the trees. We have seen this happen so many times and every bit of wildlife is wiped out. We are quickly forcing them all out. Owls, Gopher turtles, Sandhill cranes, squirrels, Rabbits, Hawks, Water Turtles, Snakes, Deer, Bobcats are all regular to the area. It is horse country, it needs to remain as it has always been. Quiet country living.

I will along with countless neighbors be attending this rezoning meeting.

Thank You,

Karin Kendust

From: Karin Kendust <karin.kendust@gmail.com>
Sent: Thursday, June 4, 2026 11:09 AM
To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>
Subject: Defender Homes Airway Heights LLS -Case 26Z00008

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

My name is Karin Kendust

4548 Deerwood Trail, Melbourne, FL 32934.

I am writing to object to the proposed zoning change to RU-2-6 from RR-1 on a 14 acre parcel of property just North of Aurora Road and West of Turtlemound and known as the old WMEL radio station property. This developer is not from around here. He is from Washington state. He has no stake in this other than to make money. He knows nothing of the lifestyle of the Lake Washington area.

Please do not pass this zoning change request.

Please consider:

TRAFFIC ISSUE

The access to and from this property will be on to Turtlemound Road, very near the intersection of Turtlemound Road and Aurora Road (southbound). There is a four way stop sign that continues to get very backed up at all hours of the day but especially in the morning and afternoon as commuters and school children are making their way to work and school. It is not unusual to see 15 or more cars backed up at all 4 stop sign. Couple this with the traffic heading west from Turtlemound has a turn lane so double the cars exiting there. As it is now since the opening of Turtlemound at Eau Gallie Blvd., it has become worse.

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Turtlemound road already handles an excessive amount of traffic from commuters "cutting through" from Eau Gallie Blvd. to Post Road to get to the Post/Wickham (and in reverse to get from Post to EG) intersection and avoid traffic from EG to Post on Wickham road. Speeds in this area tend to be regularly faster than is legal and it has already become a hazard.

PROPERTY VALUE

Please, please consider the impact of property values that will undoubtedly lower because of this multi-family development. When our street (Deerwood Trail) and the next street were annexed into the City of Melbourne 10 or so years ago, it was done so to obtain "city" water. It benefitted both the City of Melbourne and the residents. It very positively impacted Property Value and it was done expressly with the requirement that the City of Melbourne create a zoning that was the same as we had with the County. It allowed for horses, some farm animals, keeping your RV and boat on your property and such. It has become a hazard already and I rarely see horses being ridden like I did (myself included) 15 or more years ago. It's not safe.

DRAINAGE

From: Billy King <killngrill@bellsouth.net>

Sent: Wednesday, June 3, 2026 10:27 AM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Subject: Formal Objection: Case 26Z00008 (Defender Homes Airway Heights LLC)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Ms. Gilliam and Members of the Brevard County Planning and

Zoning Board,

Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road) My name is Billy King, and I reside at 4360 Nail Farm Rd. which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6, and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

Zoning Incompatibility: The surrounding area is established as a lower-density, rural residential community. Introducing multiple-family high-density housing destroys the established neighborhood character and sets a damaging zoning precedent.

Traffic and Safety: Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create safety hazards.

Drainage and Wetland Preservation: This sector has known challenges with drainage, wetlands, and existing local crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks and damage sensitive local wetlands.

Please include this objection in the official case file and distribute it to all board members prior to the upcoming public hearing on June 15, 2026. I request that my opposition be noted in the official meeting minutes. Thank you for your time, service, and consideration of the community's safety and integrity.

Sincerely,

Billy King,

321-427-7544, killngrill@bellsouth.net

Sent from my iPhone

From: Jennifer Kline <JKline@Neighborhoodloans.com>
Sent: Saturday, June 6, 2026 9:37 AM
To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>
Subject: FW: Opposition to zoning change of 1800 Turtle Mound Rd to RU-2-6

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

To Whom It May Concern,

As a resident at 3403 Palomino Rd, I am opposed to the request to change zoning for 1800 Turtle Mound Road to RU-2-6 for the same reasons set forth in the letter sent to you by Scott Schiffer dated 6/5/2026.



Jennifer Kline

Spacecoast Area Manager/Loan Officer

M: 321-684-1975 •
JKline@Neighborhoodloans.com •

306 E Strawbridge Ave Melbourne, FL 32901
Company NMLS# 222982 NMLS# 1574523

APPLY NOW

★ MY REVIEWS



Wire fraud is the fastest growing cyber-crime in the U.S. Neighborhood Loans and its DBAs will never send you wiring instructions outside of closing. When communicating on your transaction, please never hesitate to pick up the phone and call a known contact.

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From: [Keith K](#)
To: [AdministrativeServices](#)
Cc: keith.kow1@gmail.com; [Renee](#)
Subject: Objection to rezoning Case 26Z00008 & 6Z00008, Defender Homes Airway Heights LLC
Date: Monday, June 8, 2026 3:24:51 PM
Attachments: [Kowalske comments rezoning 26SS00002 and 26Z00008.docx](#)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

Subject: Formal Objection: Case 26Z00008 (Defender Homes Airway Heights LLC & ID # 26SS00002

Attached please my wife and I's objections to the proposed rezoning of 14.37 acre property on White Road and Turtlemound Road which is located directly across the street from our 1.5 Acre home located at 3955 White Road/Turtlemound property. We have lived in this location for over 27 years are extremely upset to learn that they are proposing to put Townhomes or Apartments with zero lot lines in a 1 Acre+ Residential area. Formal letter with our signatures are attached, please include this objection in the official case file and distribute it to all board members prior to upcoming public hearing on 15 June 2026. We request that our opposition be noted in the official meeting minutes.

Thank you for your assistance in this urgent matter.

Warm regards
Keith & Renee Kowalske
3955 White Road
Melbourne, Florida 32934

(321)591-4514
keith.kow1@gmail.com

Keith & Renee Kowalske
3955 White Road
Melbourne, Florida 2934

07 June 2026

Subject: **Formal Objection: Case 26Z00008** (Defender Homes Airway Heights LLC)
ID # **26SS00002**

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board,

Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)

My name is Renee Kowalske, and I reside at 3955 White Road, which is located directly across from my front door near the proposed development site. I am writing to formally register our **strong** objections to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. My husband's family has been residents of Melbourne, Florida for 106 years and my family has resided in Melbourne since 1960. When I was growing up it was a dream to move to the country and be surrounded in the local wildlife and horses of the Turtlemound/Lake Washington Area. 28 years ago we purchased our dream property on Turtlemound and White and built our dream home, we have lived her for 27 years and absolutely love this area. Ask any native Melbourne/Eau Gallie residents where the country is and they will all say Turtlemound and the Lake Washington area. We have beautiful bobcats that pass through our yard and we have seen several gopher turtles on the proposed property as well as Florida Scrub-Jays, Red Tail Hawks, Barred Owls, Great Horned Owls, pileated Woodpeckers and Eagles. Our yard is a certified "Wildlife Habitat recognized by the National Wildlife Federation (#202.035) as well as a Monarch Waystation. I am a member of the World Wildlife Federation and the National Audubon Society and have seen the endangered Florida Scrub-Jay's on the property that used to be the old radio station that Defender Homes Airway Heights, LLC is trying to destroy by adding Townhomes/Apartments that are not needed in this area. Florida Scrub-Jays are classified as Threatened under the Endangered Species Act. It is the only bird species found exclusively in Florida and has declined by 90% since the 1800's due to habitat loss, leaving fewer than 10,000 birds in the wild. We enjoy watching our friends and neighbors ride their horses down White Road and Turtlemound and bird watch, we both retired after 45 years of working in the Defense Sector on the Space Coast and enjoy the simple life of watching wildlife and bird watching on our peaceful property.

I have serious concern as to what will happen with flooding and the drainage situation that is already severely taxed. My neighbors at Village Glenn already have serious drainage problems when we have storms, I can't imagine what will happen to these poor residents. The traffic is very dangerous at the 4 way stop sign on Turtle mound and Aurora Road, there has been multiple accidents and one death in this area.

Keith & Renee Kowalske
3955 White Road
Melbourne, Florida 2934

I urge the Board to **deny the request** to shift this property from RES 4 to RES 6, and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community: Zoning Incompatibility: The surrounding area is established as a lower-density, rural residential community. Introducing multiple-family high-density housing destroys the established neighborhood character and sets a damaging zoning precedent. Traffic and Safety: Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create safety hazards. Drainage and Wetland Preservation: This sector has known challenges with drainage, wetlands, and existing local crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks and damage sensitive local wetlands. Please include this objection in the official case file and distribute it to all board members prior to the upcoming public hearing on June 15, 2026. I request that our opposition be noted in the official meeting minutes.

Thank you for your time, service, and consideration of the community's safety and integrity.

Sincerely,



Renee Kowalske
Renee.kow@gmail.com
(321) 223-1929



Keith Kowalske
Keith.kow1@gmail.com
(321) 591-4514

From: Brittany Kronebusch <bmkronebusch@gmail.com>

Sent: Tuesday, June 2, 2026 4:58 PM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Subject: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board
Re: Formal Objection to Case 26Z00008 & Case 26S.02 ([1800 Turtle Mound Road](#))

My name is Brittany Kronebusch, and I reside at 4620 hidden lakes place, which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6, and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

Zoning Incompatibility: The surrounding area is established as a lower-density, rural residential community. Introducing multiple-family high-density housing destroys the established neighborhood character and sets a damaging zoning precedent.

Traffic and Safety: Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create safety hazards.

Drainage and Wetland Preservation: This sector has known challenges with drainage, wetlands, and existing local crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks and damage sensitive local wetlands.

Please include this objection in the official case file and distribute it to all board members prior to the upcoming public hearing on June 15, 2026. I request that my opposition be noted in the official meeting minutes. Thank you for your time, service, and consideration of the community's safety and integrity.

Thank you,
Brittany Kronebusch

From: Drew Kronebusch <dkronebusch1@gmail.com>

Sent: Tuesday, June 2, 2026 11:26 AM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Subject: Formal Objection: Case 26Z00008 (Defender Homes Airway Heights LLC)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board

Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road) My name is Drew Kronebusch, and I reside at 4620 hidden lakes place, which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6, and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

Zoning Incompatibility: The surrounding area is established as a lower-density, rural residential community. Introducing multiple-family high-density housing destroys the established neighborhood character and sets a damaging zoning precedent.

Traffic and Safety: Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create safety hazards.

Drainage and Wetland Preservation: This sector has known challenges with drainage, wetlands, and existing local crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks and damage sensitive local wetlands.

Please include this objection in the official case file and distribute it to all board members prior to the upcoming public hearing on June 15, 2026. I request that my opposition be noted in the official meeting minutes. Thank you for your time, service, and consideration of the community's safety and integrity.

Sincerely,
Drew Kronebusch
Sent from my iPhone

From: Linda Lamb <ljl1849@aol.com>

Sent: Sunday, June 7, 2026 11:51 AM

To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>; Commissioner, D4 <D4.Commissioner@brevardfl.gov>; D3commissioner@BrevardFL.gov; D2commissioner@brevardFL.gov; Commissioner, D1 <D1.Commissioner@brevardfl.gov>

Subject: ReZoning Notice #26Z00008

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

I writing to let you know I am very AGAINST rezoning the old WMEL property on Turtle Mound Rd to allow apartment complex. We don't need another complex taking our green spaces. It would cause flooding in the trailer park to the west and we don't have the roads/sidewalks to sustain more traffic.

Please don't allow this to happen.

Thank you,

Linda Lamb
1849 Oakwood Trail
Melbourne, FL 32934
Resident of Brevard Country since 1968

From: Jennifer Lanford <jlaf129@yahoo.com>

Sent: Monday, June 8, 2026 12:09 PM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Subject: Formal Objection: Case 26Z00008 (Defender Homes Airway Heights LLC)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Ms. Gilliam and Members of the Brevard County Planning Zoning Board,

Re: Formal Objection to Case 26Z00008 and Case 265,02 (1800 Turtle Mound Road)

My name is Jennifer Lanford (phone number-321-536-4934) and I live at 4082 Janewood Lane, Melbourne, Florida 32934. I have been a resident at this address since 1995. My husband and I have raised our children here and now enjoy our grandchildren at our home in Carolwood Estates. I would like to formally object to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the Northwest corner of White Road and Turtle mound Road.

I urge the board to deny the request to shift this property from RES 4 to RES 6, and from Rural Residential (RR-1) to Low -Density Multiple -Family (RU-2-6), based on the following critical impacts to our community.

Traffic has doubled since the opening of Turtle mound Road to State Road 518. It is a 2 lane Road that daily gets backed up at Aurora Road and Lake Washington Road. Any given day you can sit in traffic from Waste Management trucks, Mail delivery vehicles, Amazon, school buses and basic travelers. This development will severely degrade local traffic flow and create safety hazards.

Our drainage system is stressed now with hurricanes and severe storms. It needs constant maintenance to keep draining run off from current properties. There have been several occasions over the years where we have had flooding in our area. We can't add to this by removing trees and brush and adding elevation to property and parking lot.

If you drive down Turtle mound Road, you see large residential properties, beautiful old Oak trees and a very county, relaxing atmosphere. There is not one building taller than 2 stories, Not one business nor apartment complex.

I deeply object to the request made by Defender Homes Airway Heights LLC to change our zoning and our community.

Sincerely,

Jennifer Lanford

4082 Janewood Lane

Melbourne, Florida 32934

From: pgl63@reagan.com <pgl63@reagan.com>

Sent: Friday, June 5, 2026 10:08 AM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Cc: MBaloha@gmail.com

Subject: Formal Objection: Case 26Z00008 & Case 26S.02 – Defender Homes Airway Heights LLC

Importance: High

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Subject: Formal Objection: Case 26Z00008 & Case 26S.02 – Defender Homes Airway Heights LLC

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board,
Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)
My name is Patrick G. Langan, and I reside at 1609 Bonelli Ct Melbourne, FL 32934, which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6 and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

1. Zoning Incompatibility

The surrounding area is an established lower-density rural residential community. Introducing multiple-family high-density housing directly contradicts the established neighborhood character, destroys the rural fabric of this corridor, and sets a damaging zoning precedent that will invite future high-density development throughout the area.

1. Traffic and Safety

Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create significant safety hazards for existing residents. I formally request that a comprehensive traffic impact study be required and made fully available to the public prior to any approval being considered by this Board.

1. Drainage, Wetlands, and Flooding

This sector has known and documented challenges with drainage, wetlands, and existing crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks for surrounding properties and damage sensitive local wetlands. Where applicable, Florida Department of Environmental Protection and

United States Army Corps of Engineers jurisdiction over any wetlands on or adjacent to this property must be fully evaluated and disclosed before this rezoning is considered.

1. Infrastructure and Utility Capacity

The existing water, sewer, and emergency services infrastructure in this area was not designed to accommodate the demands of a high-density multi-family development. No approval should be granted without a full infrastructure capacity analysis confirming that existing systems can support this level of increased demand without negatively impacting current residents.

1. School Capacity

The addition of a high-density multi-family residential complex will place immediate and significant pressure on the enrollment capacity of local schools. The Board should require a school impact analysis prior to approval and coordinate with Brevard County Public Schools to assess whether existing facilities can absorb this growth.

1. Property Values

The proposed rezoning and resulting development will negatively impact the property values of surrounding residential homes. Residents have made long-term investments in this community based on its established rural residential character. Approving this rezoning undermines those investments and the reasonable expectations of the existing homeowners in this area.

I formally request the following:

That this objection be included in the official case file for Case 26Z00008 and Case 26S.02

That it be distributed to all Board members prior to the public hearing on June 15, 2026

That my opposition be noted in the official meeting minutes

That the Board require a full traffic impact study, infrastructure capacity analysis, school impact analysis, and wetlands evaluation before any vote is taken

That if the community has not had adequate time to organize and respond to this proposal, the Board grant a continuance to allow full public participation

Thank you for your time, service, and consideration of our community's safety, character, and integrity.

Sincerely,

Patrick G. Langan, MSgt USAF Retired
1609 Bonelli Ct Melbourne, FL 32934
623-521-0029 / pgl63@reagan.com

From: Susan Sheehan <ssheehan515@gmail.com>
Sent: Wednesday, June 3, 2026 1:52 PM
To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>
Subject: Case 26Z00008 Formal Objection

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Please find the attached letter objecting to zoning change for 1800 Turtle Mound Road. Defender Homes Airway Heights LLC.

Thank you
Susan Sheehan Lange

June 3, 2026

Subject: Formal Objection Case 26Z00008. Defender Homes Airway Heights LLC

Dear Ms Gilliam & Members of the Brevard County Planning & Zoning Board

RE: Formal Objection to Case 26Z00008 Case 265.02 1800 Turtle Mound Road, Melbourne

I am a thirty year resident of 4171 Careywood Drive, Carolwood Estates which is located near the proposed development. I have a strong objection to the proposed multi family development proposed on 1800 Turtle Mound Road and the zoning classification change requested by Defender Homes Airway Heights for the 14 acre parcel.

I urge the board to deny the request to change zoning from RES 4 to RES 6 from rural residential RR1 to low density family R6-2-6 based on critical issues affecting the community.

My concerns are the impact of increased vehicle traffic on Turtle Mound especially at the four way stops on Aurora and Lake Washington. Currently we are already experiencing long lines of vehicles at both intersections since the extension of Turtle Mound to Eau Gallie Blvd. The Amazon Warehouse is a great contributor to the traffic issues. If multifamily units are added to the traffic problem, it will be catastrophic in terms of the number of vehicles.

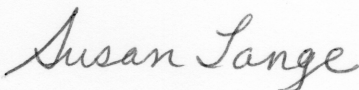
Another concern that I have is the decrease in property values and quality of rural life living near a multifamily complex. Many residents have lived in this area for years because of the quiet large acres lots. I would like to keep our quality of life and property values high.

Doesn't Melbourne have enough Multifamily complexes? Why add another to our rural area. Please keep 1800 Turtle Mound zoned as it is and not change it to a multi-family status.

Please include this objection in the official case file and distribute it to all board members prior to the upcoming public hearing on June 15, 2026. I request that my opposition be noted in the official meeting minutes.

Thank you for your consideration and hard work making Brevard County the great place I have called home for the last 55 years.

Sincerely,

A handwritten signature in cursive script that reads "Susan Lange".

Susan Sheehan Lange
ssheehan515@gmail.com
4171 Careywood Drive
Melbourne, FL. 32934
321-505-7077

From: Walter Lawrence <waltlawrence321@gmail.com>

Sent: Monday, June 8, 2026 4:19 PM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Cc: Walter Lawrence <waltlawrence321@gmail.com>; cyn.lawrence321@gmail.com

Subject: Subject: Formal Objection: Case 26Z00008 (Defender Homes Airway Heights LLC) (1800 Turtle Mound Road)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board,

My name is Walter Lawrence. My wife Cynthia and I live at 4065 Janewood Lane, Melbourne, FL 32934. We have lived here since 1993. Our subdivision, Carolwood Estates, is located 0.3 miles from the proposed development site.

I am writing to express our strongest opposition to the requested comprehensive plan amendment and zoning change for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road.

We respectfully urge the Board to deny both the request to change the property designation from RES 4 to RES 6; and the request to rezone the property from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6).

Our objections are based on the following concerns.

Maintaining a Rural Setting

Carolwood Estates is a 40-year-old neighborhood located off Turtlemound Road and Carolwood Drive. It includes 60 homes, a public park, a playground, a pavilion, and a lake. The homes are custom-built on lots of at least one to two acres.

This proposed project, located just one-third of a mile from our subdivision, would significantly affect the character of the surrounding area. The properties around our neighborhood form a rural community with horses, livestock, and homes on parcels ranging from one to five acres. This rural setting has defined the character of Carolwood Estates and the surrounding communities for more than 40 years.

Zoning Incompatible with a Rural Community

Introducing multiple-family, higher-density housing into an area of established multi-acre homesteads would have severe negative effects on the community's rural setting and properties built over the past decades.

Approving this nonconforming project next to our community would also set a harmful precedent for future zoning decisions.

Traffic and Public Safety Concerns

Neither Turtle Mound Road nor White Road is designed to handle additional traffic from higher-density, multiple-family development. As a result, traffic safety in this area is already declining and will deteriorate even faster. Carolwood Estates has only one entrance and exit: Carolwood Drive, which intersects Turtlemound Road at its east end. Over the past two years Turtlemound Road has already experienced significant increases in traffic volume and higher speeds due to:

- a) The overflow of commercial traffic from Wickham Road
- b) The extension Turtlemound road to Eau Gallie Boulevard
- c) Significant increase in traffic generated by the new Amazon warehouse
- d) The inability to widen the Turtlemound road beyond its current single lanes

Traffic on Turtlemound Road backs up daily at both the Aurora Road intersection and the Lake Washington four-way stop. Carolwood Drive, our subdivision's only entrance and exit, lies between these two congested points, making it increasingly difficult for residents to enter and leave the neighborhood safely.

Drainage and Wetland Preservation

This area of Turtle Mound Road and White Road already faces known drainage, wetland, and elevation challenges. Increased density and additional impervious surfaces would heighten flood risks and harm sensitive wetlands. I have personally seen many nearby properties that have already flooded during heavy storms, and the Turtlemound Road drainage ditch is currently unable to handle existing runoff during the rainy season.

Please include this objection in the official case file and provide it to all board members before the public hearing on June 15, 2026. I also request that our opposition be recorded in the official meeting minutes. Thank you for your time, service, and consideration in the preservation of our community's safety and character.

Sincerely,

Walter and Cynthia Lawrence

4065 Janewood Lane, Melbourne, Fl. 32934

321-698-2935

waltlawrence321@gmail.com

A Copy of this letter is attached here.

From: Christian Iezzi <chriskilla98@gmail.com>

Sent: Tuesday, June 2, 2026 9:18 PM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Cc: paul.alfrey@mlbfl.org; mark.larusso@mlbfl.org

Subject: Formal Objection: Case 26Z00008 & Case 26S.02 – Defender Homes Airway Heights LLC

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board,

Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)

My name is Christian Iezzi, and I reside at [4535 Carolwood Dr Melbourne, FL 32934], which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6 and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

1. Zoning Incompatibility

The surrounding area is an established lower-density rural residential community. Introducing multiple-family high-density housing directly contradicts the established neighborhood character, destroys the rural fabric of this corridor, and sets a damaging zoning precedent that will invite future high-density development throughout the area.

2. Traffic and Safety

Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create significant safety hazards for existing residents. I formally request that a comprehensive traffic impact study be required and made fully available to the public prior to any approval being considered by this Board.

3. Drainage, Wetlands, and Flooding

This sector has known and documented challenges with drainage, wetlands, and existing crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks for surrounding properties and damage sensitive local wetlands. Where applicable, Florida Department of Environmental Protection and

United States Army Corps of Engineers jurisdiction over any wetlands on or adjacent to this property must be fully evaluated and disclosed before this rezoning is considered.

4. Infrastructure and Utility Capacity

The existing water, sewer, and emergency services infrastructure in this area was not designed to accommodate the demands of a high-density multi-family development. No approval should be granted without a full infrastructure capacity analysis confirming that existing systems can support this level of increased demand without negatively impacting current residents.

5. School Capacity

The addition of a high-density multi-family residential complex will place immediate and significant pressure on the enrollment capacity of local schools. The Board should require a school impact analysis prior to approval and coordinate with Brevard County Public Schools to assess whether existing facilities can absorb this growth.

6. Property Values

The proposed rezoning and resulting development will negatively impact the property values of surrounding residential homes. Residents have made long-term investments in this community based on its established rural residential character. Approving this rezoning undermines those investments and the reasonable expectations of the existing homeowners in this area.

I formally request the following:

That this objection be included in the official case file for Case 26Z00008 and Case 26S.02

That it be distributed to all Board members prior to the public hearing on June 15, 2026

That my opposition be noted in the official meeting minutes

That the Board require a full traffic impact study, infrastructure capacity analysis, school impact analysis, and wetlands evaluation before any vote is taken

That if the community has not had adequate time to organize and respond to this proposal, the Board grant a continuance to allow full public participation

Thank you for your time, service, and consideration of our community's safety, character, and integrity.

7. Alternative Land Use Consideration

As an alternative to the proposed rezoning, I respectfully encourage the Board to consider maintaining the property's existing RR-1 Rural Residential zoning designation. If development under the current classification is not feasible, I would support exploring opportunities for acquisition by the City of Melbourne or another public entity for use as community green space, conservation land, passive recreation, or other public-purpose uses. Such alternatives would better preserve the character of the surrounding area while providing long-term benefits to current and future residents.

Sincerely,

Christian Iezzi

4535 Carolwood Dr

Melbourne, FL 32934

321-298-3067

From: Danielle Iezzi <danielle.lee.iezzi@gmail.com>
Sent: Friday, June 5, 2026 9:06 PM
To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>
Subject: Turtle Mound Rezone -Opposed

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

Please consider the following:

I am opposed to the request to change the zoning for 1800 Turtle Mound Road to RU-2-6 for the same reasons set forth by my neighbor Scott Schiffer's letter dated June 5, 2026.

Thank you ,
Danielle Iezzi

From: John Marcin <visionmaxxoptical@gmail.com>
Sent: Tuesday, June 9, 2026 4:28:52 PM
To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>
Subject: Rezoning of Old radio station property on Turtle mound

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Mr. Altman:

I am Dr. John Marcin, a resident in Aurora Woods on Aurora near the Turtle Mound intersection, and also owner of VisionMaxx on Wickham and Lake Washington. It has come to my attention that there is an effort to re-zone the old radio station property on Turtle Mound Road to a density of 6 units per acre. Throughout this residential area the current lot sizes are typically 1/2 to one acre, with some quite nice single family homes. The intersection of Turtle Mound and Aurora is extremely busy during peak hours already, and with the introduction of the Amazon distribution center it has become even moreso. There is absolutely no precedent for a population density as requested by this re-zoning, and will result in an untenable increase in traffic at this intersection, as well as a degradation of property values in this immediate area. If someone wants to create a nice, quality single-family housing development consistent with the other homes in the neighborhood, that's fine, but with the density requested in this re-zoning I am totally opposed to it for the above reasons.

Thank you for your time and your efforts.

Bambi McKlem
1879 Oakwood Trail
Melbourne Fl 32934
910-494-7608
bmcklem@yahoo.com

Subject: Formal Objection: Case 26Z00008 (Defender Homes Airway Heights LLC)

Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board

My name is Bambi McKlem, and I reside at 1879 Oakwood Trail Melbourne Florida 32934, which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defenders Homes Airway Height LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6, and from Rural Residential to (RR-1) to Low- Density Multiple-Family (RU-2-6), based on the critical impacts to our community.

Zoning Incompatibility: The surrounding area is established as a lower density, rural residential community. Introducing multiple family high -density housing destroys the established neighborhood character and sets a damaging zoning precedent.

Traffic and Safety: Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create safety hazards.

Drainage and Wetland Preservation: This sector has known challenges with drainage, wetlands, and existing local crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks and damage sensitive local wetlands.

Please include this objection in the official case file and distribute it to all board members prior to the upcoming public hearing on June 15, 2026. I request that my opposition be noted in the official meeting minutes.

Thank you for your time, your service, and consideration of the community's safety and integrity.

Sincerely,

Bambi McKlem

910-494-7608

bmcklem@yahoo.com

From: MJ M <mmikuen@gmail.com>

Sent: Wednesday, June 10, 2026 3:18 PM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Subject: Formal Objection:Case 26Z00008 (Defender Homes Airway Heights LLC)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board, Ron Bartcher, Henry Minneboo, Ana Saunders, Robert B. Wise, Jerrad Atkins, John Hopengarten, Robert P Brothers, Greg Nicklas, Mark Wadsworth, Ruth Amato, W Eric Michajlowicz, Neal Johnson, Debbie Thomas, EricaL Orriss, and Melissa Jackson,

Re: Formal Objections to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound road)

My name is Monica Mikuen I live at 4301 Careywood Drive and I reside near the proposed development site. I am writing to formally oppose the comprehensive plan amendment and zoning change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road.

I urge the Board to deny the request to change the property from RES 4 to RES 6 and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6) for the following reasons:

- **Zoning Incompatibility:** The area is a low-density rural residential community. Multi-family housing would alter the neighborhood's character and create a harmful zoning precedent.
- **Traffic and Safety:** Turtle Mound Road and White Road are not designed to handle the increased traffic generated by higher-density development, creating congestion and safety concerns.
- **Drainage and Wetlands:** The area already faces drainage and wetland challenges. Increased density and impervious surfaces will worsen flooding risks and harm sensitive wetlands.

Please include this objection in the official case file and provide it to all board members before the June 15, 2026 public hearing. I also request that my opposition be entered into the official meeting minutes.

Thank you for your time and consideration of our community's safety and character.

Sincerely,

Monica Mikuen

4301 Careywood Dr

Melbourne, Florida 32934

mmikuen@gmail.com

From: Dianne Baumert-Moyik <dmoyik@gmail.com>

Sent: Wednesday, June 3, 2026 12:13 PM

To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>

Cc: Seeta Durjan Begui <seetamedia@aol.com>

Subject: 1800 Turtle Mound Rd Rezoning Application; Higher density (6 units per acre than one acre lots)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Good afternoon Brevard County Commission Chairman Altman,

The attached notice is posted at 1800 Turtle Mound Rd. it is a 14.37 acre site zoned for one acre lots. The applicant is looking for a rezoning to a much higher density. It appears that the applicant wants to build six units per acre as per county code.

I would like to know what the site plan is proposing as the property owner currently operates owns and operates apartments in Washington State. I am opposed to changing the zoning character of that 14 acre site and residents living on Carolwood feel the same way.

Turtle Mound Rd is a residential roadway and already receives a high rate of traffic as a throughway from Eau Gallie to the south where a new Amazon distribution center opened and roads North for people trying to avoid Wickham. We repeatedly have accidents including a fatality at Aurora and Turtle Mound (just to the south of this site) as well as ongoing accidents at Lake Washington and Turtle Mound. A few years ago, I asked the County to install larger stop signs which they did. You can contact the Police Department for reports on this.

Dianne Baumert-Moyik
2445 Turtle Mound Rd
Melbourne, FL 32934
321-428-4755

REZONING NOTICE

26Z000008

The Brevard County Planning & Zoning Board will hold a public hearing at 3:00 P.M. on JUNE 15, 2026, at the Brevard County Government Center, 2725 Judge Fran Jamieson Way, Building C, Viera, FL, to consider the proposed zoning action on the property as indicated below:

Owner: Defender Homes Airway Heights, LLC

Present Zoning: RR-1

Acreage: 14.37 ACRES

Requested Action(s): RU-2-6 (Low-Density Multiple-Family)

The recommendations from the aforementioned public hearing will be presented to the County Commission at 5:00 P.M. on JULY 09, 2026, at the Brevard County Government Center, 2725 Judge Fran Jamieson Way, Building C, Viera. Interested parties are invited to appear and submit comments filed with the

5:10



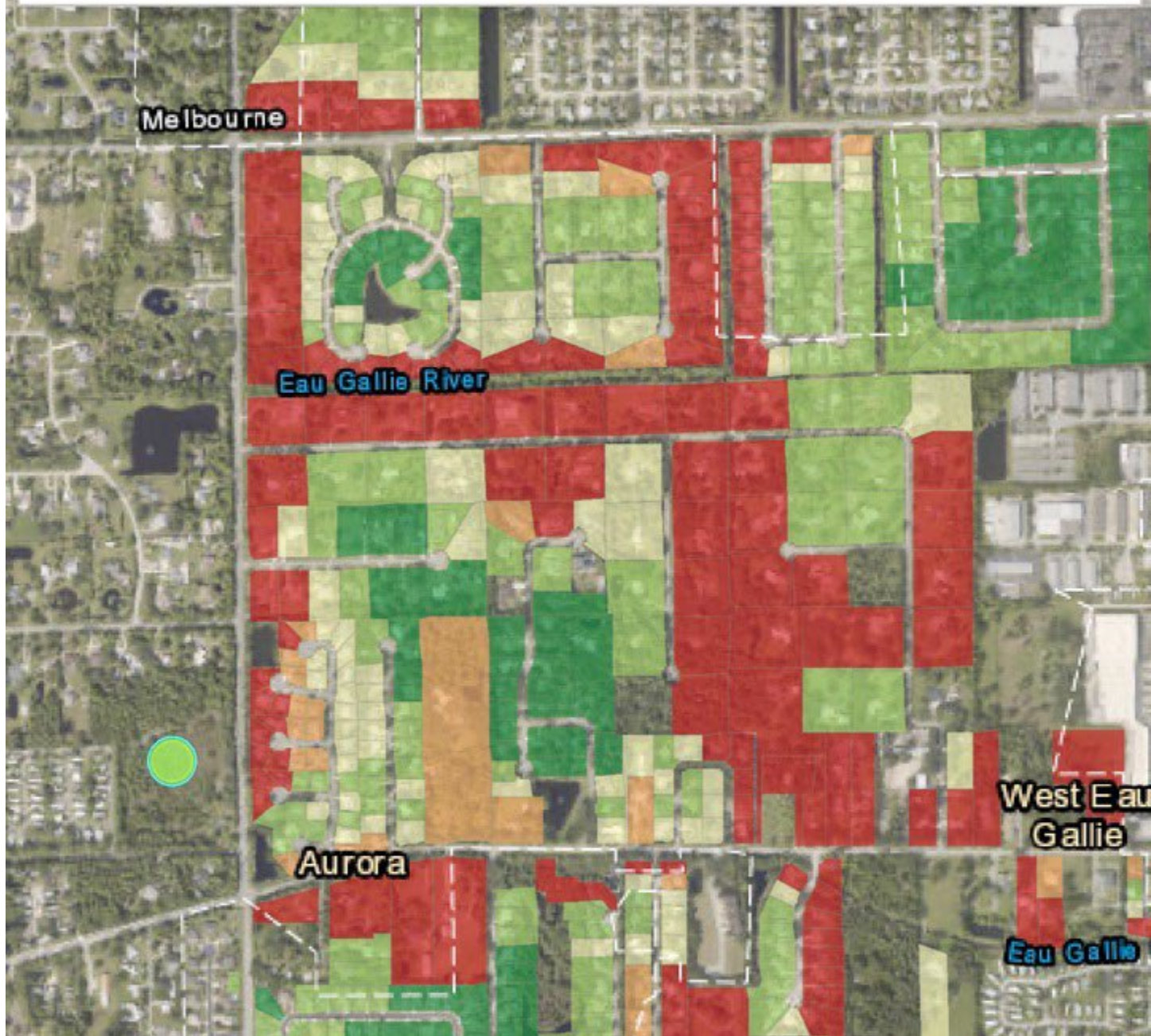
Septic Mapper



1800 TURTLE MOUND RD, MELBOURNE, FL, 32...



Search result





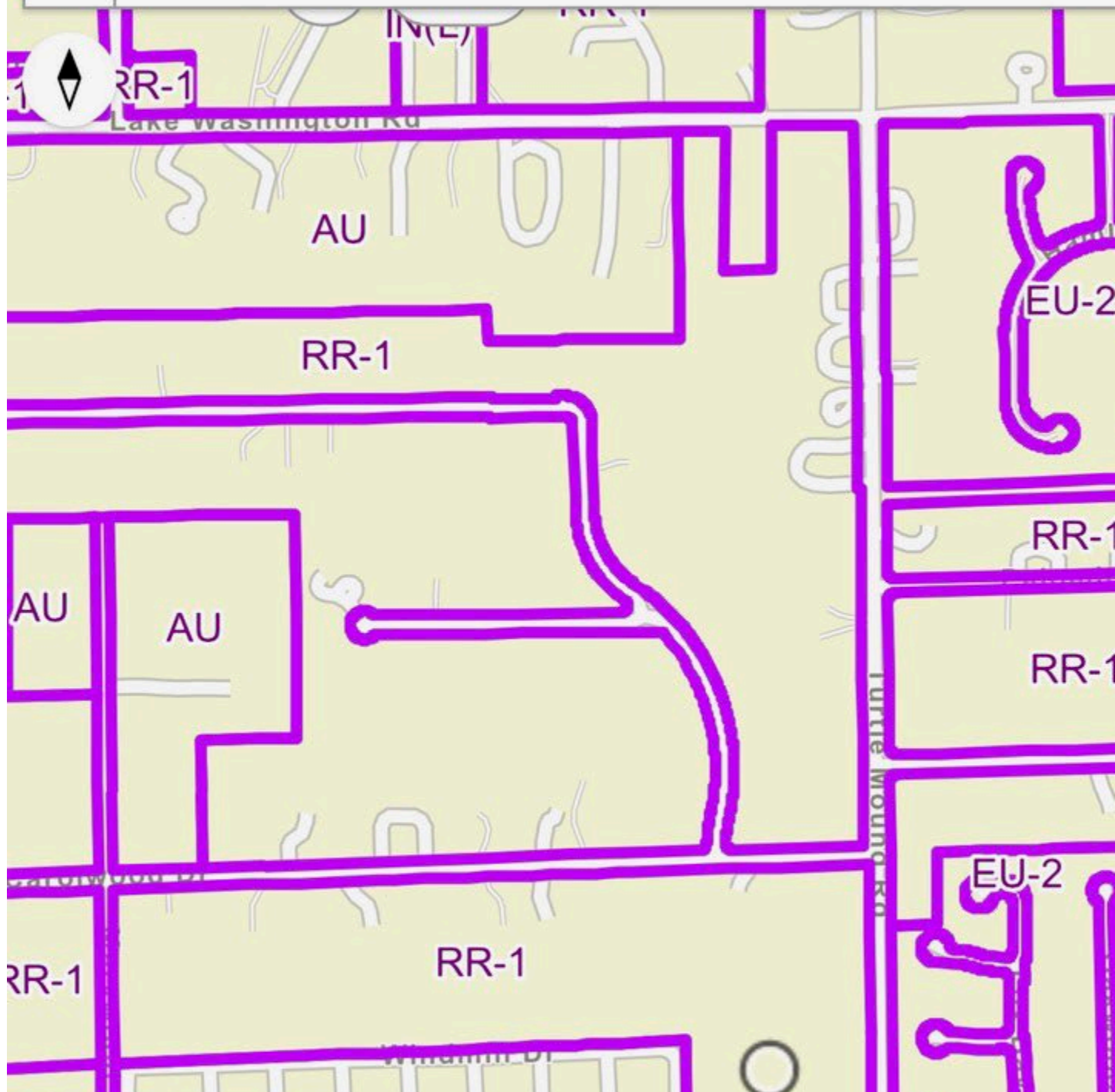
Zoning & Future Land

Em

Planning & Development Department Web Page



1800 TURTLE MOUND RD, MELBOURNE, FL, ...



From: [Dianne Baumert-Moyik](#)
To: [AdministrativeServices](#); [Commissioner, D1](#); [Commissioner, D5](#); [Commissioner, D3](#); [Commissioner, D2](#); [Commissioner, D4](#)
Cc: [Holton, Ashley](#); [City of Melbourne, FL](#); mike@mike4congress.com
Subject: PROTEST & OBJECTION to Rezoning 26Z00008 & FLUM Amendment 26SS00002 | Severe Flood and Wetland Violations at 1800 Turtle Mound Road
Date: Tuesday, June 9, 2026 12:29:16 PM
Attachments: [Density Example 14.37 acres.pdf](#)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

PROTEST & OBJECTION to Rezoning 26Z00008 & FLUM Amendment 26SS00002 | Severe Flood and Wetland Violations at 1800 Turtle Mound Road

Dear Members of the Brevard County Board of County Commissioners,

As a resident of the affected community, I am writing to formally enter my objection to application 26Z00008 and its companion Future Land Use Map amendment 26SS00002.

The applicant's proposal to jam an 86-unit high-density subdivision onto 14.37 acres of severely constrained land is a direct violation of Brevard County's environmental protections, floodplain ordinances, and neighborhood compatibility mandates. Using the county's own GIS mapping files and the expert findings of the Natural Resources Management Department (NRM), it is mathematically and physically impossible for this project to succeed without causing catastrophic drainage issues for surrounding families.

I urge you to deny this application based on the following undeniable factual evidence found in the official maps:

1. The Central Wetland Core Blocks High-Density Infrastructure The Wet Prairie Boundary: The SJRWMD FLUCCS Wetlands Map (image_3.png) and the NWI Wetlands Map (image_2.png) reveal a massive, irregular Freshwater Emergent Wetland footprint designated as Parcel 33.01 sitting squarely in the center-south of the property.

The 1.8% Impact Cap: The NRM report explicitly notes that for multi-family/subdivision parcels greater than five acres, Section 62-3694(c)(6) limits cumulative wetland impacts to a maximum of 1.8% of the total acreage.

Physical Impossibility: On a 14.37-acre property, a 1.8% allowance limits total wetland disturbance to a microscopic 0.25 acres. Looking at the vast blue and green footprint in image_2.png and image_3.png, it is a logistical impossibility to construct 86 separate home sites, driveways, sewer lines, and a heavy-vehicle neighborhood roadway layout while leaving 98.2% of this wet prairie completely untouched.

2. The Proposed Density Sits Entirely in a FEMA Flood Hazard Zone Majority Inundation: The FEMA Flood Zones Map (image_4.png) proves that a substantial majority of this property sits directly within Flood Zone A (indicated by the extensive pink shaded swath). Severe Runoff Threats to Abutting Neighbors: Pursuant to Section 62-3723(2), "Development within floodplain areas shall not have adverse impacts upon adjoining properties".

Furthermore, Chapter 62, Article X, Division 6 mandates that "No site alteration shall adversely affect the existing surface water flow pattern". Displaced Stormwater: The maps show that the entire western and southern boundaries of the site are choked by this active flood zone.

To pack 86 structures into this pink Zone A footprint, the developer must dump millions of pounds of fill dirt to build up the land. This will inherently create an artificial ridge, permanently displacing floodwaters and forcing severe stormwater runoff directly into the backyards of the established, lower-density single-family homes immediately abutting the property on Windmill Drive, Theresa Drive, and White Road.

3. Absolute Incompatibility with Surrounding Land Patterns No Local Precedent: The surrounding property maps clearly delineate the deep, spacious, acreage-style single-family home plats to the north and west. Zero Townhomes Within 1 Mile: The county's expert planning staff explicitly confirmed that "within a 1.0-mile radius of the subject property, there are no townhome zoning classifications or properties developed with townhomes". Violating Policy 1.6: Staff also explicitly declared that "the subject property is not considered transitional".

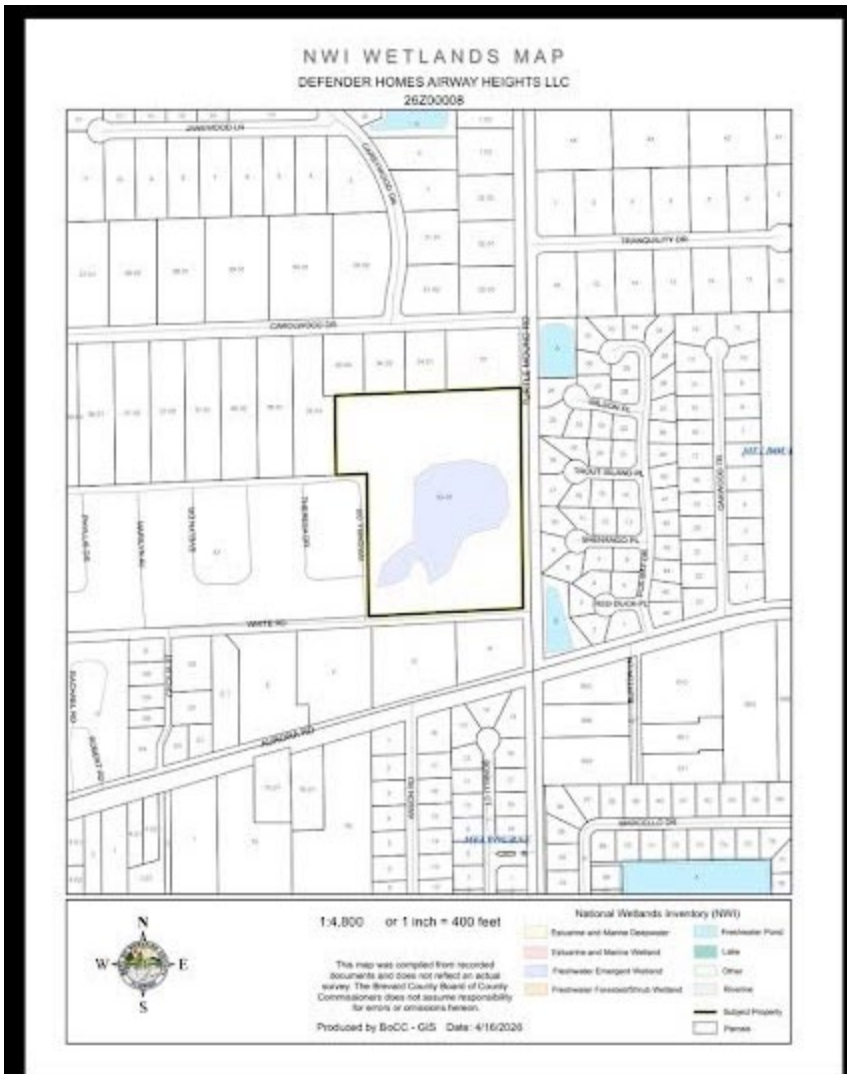
Forcing a dense, 86-unit urban grid into the middle of an established, historically low-density RES 4 area completely violates Future Land Use Element Administrative Policy #4's mandate to protect neighborhood character. The current Rural Residential (RR-1) classification allows for a safe, low-impact potential of 14 units, which naturally accommodates the severe environmental limits of the land without flooding out the neighbors.

Up-zoning this property to an RU-2-6 Multiple-Family classification to force an 86-unit footprint onto a protected wet prairie and an active FEMA flood zone is reckless and legally non-compliant. As expert planners and commissioners, your highest priority is to safeguard the public health, safety, and welfare of Brevard County residents. The physical facts on these maps prove this land cannot support this project.

I strongly urge you to uphold our Comprehensive Plan and deny applications 26Z00008 and 26SS00002.

Thank you for your consideration,
Dianne Baumert-Moyik, Paul Moyik and Alyssa Moyik
2445 Turtle Mound Rd
Melbourne, Fla 32934-7653
We live .7 miles from 1800 Turtle Mound Rd.

We have also attached a density comparison from the current zoning.



DEFENDER HOMES AIRWAY HEIGHTS LLC
26200008



26Z00008



DENSITY COMPARISON ON 14.38 ACRE SITE

1 HOME PER ACRE 14 HOMES



DENSITY: 1 UNIT / ACRE
TOTAL HOMES: 14
AVG. LOT SIZE: ~43,560 SQ FT (1 ACRE)
ROAD LENGTH: ~1,200 LF
OPEN SPACE: ~80%
CHARACTER: ESTATE LOTS, SPACIOUS, VERY PRIVATE

6 HOMES PER ACRE 86 HOMES



DENSITY: 6 UNITS / ACRE
TOTAL HOMES: 86
AVG. LOT SIZE: ~7,260 SQ FT
ROAD LENGTH: ~2,700 LF
OPEN SPACE: ~25-30%
CHARACTER: NEIGHBORHOOD SCALE, WALKABLE, CONNECTED

LOW DENSITY (1 HOME PER ACRE)



14 HOMES



~43,560 SQ FT
PER HOME



~1,200 LF
OF ROADS



~80%
OPEN SPACE



LOWER
POPULATION

SAME SITE
14.38
ACRES

MODERATE DENSITY (6 HOMES PER ACRE)



86 HOMES



~7,260 SQ FT
PER HOME



~2,700 LF
OF ROADS



~25-30%
OPEN SPACE



HIGHER
POPULATION

From: Susan Muniz <munizs84@yahoo.com>

Sent: Thursday, June 4, 2026 11:13 PM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Cc: Susan Muniz <munizs84@yahoo.com>

Subject: Formal Objection: Case 26Z00008 & Case 26S.02 – Defender Homes Airway Heights LLC

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board,

My name is Susan Muniz and I reside at 3692 Pascoli Pl, Melbourne FL 32934 which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6 and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

1. Zoning Incompatibility

The surrounding area is an established lower-density rural residential community. Introducing multiple-family high-density housing directly contradicts the established neighborhood character, destroys the rural fabric of this corridor, and sets a damaging zoning precedent that will invite future high-density development throughout the area.

2. Traffic and Safety

Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create significant safety hazards for existing residents. I formally request that a comprehensive traffic impact study be required and made fully available to the public prior to any approval being considered by this Board.

3. Drainage, Wetlands, and Flooding

This sector has known and documented challenges with drainage, wetlands, and existing crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks for surrounding properties and damage sensitive local wetlands. Where applicable, Florida Department of Environmental Protection and United States Army Corps of Engineers jurisdiction over any wetlands on or adjacent to this property must be fully evaluated and disclosed before this rezoning is considered.

4. Infrastructure and Utility Capacity

The existing water, sewer, and emergency services infrastructure in this area was not designed to accommodate the demands of a high-density multi-family development. No approval should be granted without a full infrastructure capacity analysis confirming that existing systems can support this level of increased demand without negatively impacting current residents.

5. School Capacity

The addition of a high-density multi-family residential complex will place immediate and significant pressure on the enrollment capacity of local schools. The Board should require a school impact analysis prior to approval and coordinate with Brevard County Public Schools to assess whether existing facilities can absorb this growth.

6. Property Values

The proposed rezoning and resulting development will negatively impact the property values of surrounding residential homes. Residents have made long-term investments in this community based on its established rural residential character. Approving this rezoning undermines those investments and the reasonable expectations of the existing homeowners in this area.

I formally request the following:

- That this objection be included in the official case file for Case 26Z00008 and Case 26S.02.
- That it be distributed to all Board members prior to the public hearing on June 15, 2026.
- That my opposition be noted in the official meeting minutes.
- That the Board require a full traffic impact study, infrastructure capacity analysis, school impact analysis, and wetlands evaluation before any vote is taken.
- That if the community has not had adequate time to organize and respond to this proposal, the Board grant a continuance to allow full public participation.

Thank you for your time, service, and consideration of our community's safety, character, and integrity.

Sincerely,

Susan Muniz
3692 Pascoli Pl, Melbourne FL 32934
(321) 749-5397
Munizs84@yahoo.com

From: Gordon Nelson <nelson@fit.edu>
Sent: Tuesday, June 9, 2026 3:44 PM
To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>
Subject: Defender Homes Airway Heights LLC Case 26Z00008

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Gordon Nelson, Ph.D.
2283 Hamlet Drive
Melbourne FL 32934
321-255-1163

nelson@fit.edu

This is to express my objection to Case 26Z00008 (1800 Turtle Mound Road).

The Turtle Mound Road area is what little remains of rural residential in Melbourne. North of Aurora Road should remain that way. Case 26Z00008 will be very much out of place. The character of the Turtle Mound/Lake Washington area needs to be preserved.

I am in the Hamlet which is near the SE intersection of Lake Washington and Turtle Mound. My lot is 0.37 acres. A nearby neighbor (2315 Polonius) is 0.47 acres. The Hamlet has a large landscaped entrance and a central pond. Houses in the central area have no fences. The bottom line is we are about 2 houses per acre. That gives an idea of how small 6 units per acre actually is. The Case 26Z00008 development alone is 84 units versus 50 in the Hamlet on our much larger site.

We already have traffic issues. In late afternoons coming south on Turtle Mound I get to Lake Washington, after waiting to make a left turn I frequently find traffic in the west bound lane backed up well past the entrance to the Hamlet. That means some in the west bound lane going to the Hamlet use the east bound lane to make the turn into the Hamlet (not a safe practice). I already know the problem which is why I come down Turtle Mound and not Wickham.

Today after lunch I went east on Lake Washington. The Wickham traffic light only allows east bound traffic 30 seconds to cross, which keeps half the cars waiting for a second light. That is made worse by the new Bank construction on the SW corner closing the ally west of the bank.

Another 150 cars on Turtle Mound will not help.

Will CaseZ00008 be connected to sewer? That many units on such a small location need to be on sewer not the badly engineered updated septic tanks.

An out of place development, more traffic, reduction in nearby open space, birds, wildlife, will not be helpful for area values.

I am a NO, NO. NO.

From: Lindsay Sanger Norton <lindsaysanger@gmail.com>

Sent: Friday, June 5, 2026 11:40 PM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Subject: Formal objections-Case 26Z00008 & Case 26S.02 – Defender Homes Airway Heights LLC

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board,

Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Rd.

My name is Lindsay Sanger Norton and I own and reside at 2280 Turtle Mound Rd., which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6 and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

1. Zoning Incompatibility

As a homeowner in the area and real estate professional this is concerning. The surrounding area is an established lower-density rural residential community. Introducing multiple-family high-density housing directly contradicts the established neighborhood character, destroys the rural fabric of this corridor, and sets a damaging zoning precedent that will invite future high-density development throughout the area.

2. Traffic and Safety

Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create significant safety hazards for existing residents. I formally request that a comprehensive traffic impact study be required and made fully available to the public prior to any approval being considered by this Board.

Traffic at my house is nearly impossible to get out in the morning or evening at peak traffic times already. There are many accidents at the 4 way stops already.

3. Drainage, Wetlands, and Flooding

This sector has known and documented challenges with drainage, wetlands, and existing crown elevations. Increasing density and adding impervious surfaces will exacerbate

flooding risks for surrounding properties and damage sensitive local wetlands. Where applicable, Florida Department of Environmental Protection and United States Army Corps of Engineers jurisdiction over any wetlands on or adjacent to this property must be fully evaluated and disclosed before this rezoning is considered.

4. Infrastructure and Utility Capacity

The existing water, sewer, and emergency services infrastructure in this area was not designed to accommodate the demands of a high-density multi-family development. No approval should be granted without a full infrastructure capacity analysis confirming that existing systems can support this level of increased demand without negatively impacting current residents.

5. School Capacity

The addition of a high-density multi-family residential complex will place immediate and significant pressure on the enrollment capacity of local schools. The Board should require a school impact analysis prior to approval and coordinate with Brevard County Public Schools to assess whether existing facilities can absorb this growth.

6. Property Values

The property values immediately come to mind as a real estate professional I know that this will be impactful. The proposed rezoning and resulting development will negatively impact the property values of surrounding residential homes. Residents have made long-term investments in this community based on its established rural residential character. Approving this rezoning undermines those investments and the reasonable expectations of the existing homeowners in this area.

I formally request the following:

That this objection to be included in the official case file for Case 26Z00008 and Case 26S.02.

That it be distributed to all Board members prior to the public hearing on June 15, 2026.

That my opposition be noted in the official meeting minutes.

That the Board require a full traffic impact study, infrastructure capacity analysis, school impact analysis, and wetlands evaluation before any vote is taken.

That if the community has not had adequate time to organize and respond to this proposal, the Board grant a continuance to allow full public participation.

Thank you for your time, service, and consideration of our community's safety, character, and integrity.

Thanks,

Lindsay Sanger Norton
2280 Turtle Mound Rd.
321-848-8379

From: [Chris Pastirik](#)
To: [Commissioner, D5; AdministrativeServices; Gilliam, Trina](#)
Subject: Formal Objection: Case 26Z00008 (Defender Homes Airway Heights LLC)
Date: Sunday, June 7, 2026 8:36:04 AM
Attachments: [Objection to case 26Z00008 \(Defender Homes Heights LLC\) A.docx](#)
[Objection to case 26Z00008 \(Defender Homes Heights LLC\) \(1\) B.docx](#)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Bambi McKlem

1879 Oakwood Trail
Melbourne FL 32934
910-494-7608

bmcklem@yahoo.com

Subject: Formal Objection: Case 26Z00008 (Defender Homes Airway Heights LLC)

Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board

My name is Bambi McKlem, and I reside at 1879 Oakwood Trail Melbourne Florida 32934, which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defenders Homes Airway Height LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6, and from Rural Residential to (RR-1) to Low- Density Multiple-Family (RU-2-6), based on the critical impacts to our community.

Zoning Incompatibility: The surrounding area is established as a lower density, rural residential community. Introducing multiple family high -density housing destroys the established neighborhood character and sets a damaging zoning precedent.

Traffic and Safety: Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create safety hazards.

Drainage and Wetland Preservation: This sector has known challenges with drainage, wetlands, and existing local crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks and damage sensitive local wetlands.

Please include this objection in the official case file and distribute it to all board members prior to the upcoming public hearing on June 15, 2026. I request that my opposition be noted in the official meeting minutes.

Thank you for your time, your service, and consideration of the community's safety and integrity.

Sincerely,
Bambi McKlem
910-494-7608
bmcklem@yahoo.com

Christopher Pastirik

1879 Oakwood Trail

Melbourne FL 32934

321.704.0881

cgpastirik@gmail.com

Subject: Formal Objection: Case 26Z00008 (Defender Homes Airway Heights LLC)

Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board

My name is Christopher Pastirik, and I reside at 1879 Oakwood Trail Melbourne Florida 32934, which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defenders Homes Airway Height LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6, and from Rural Residential to (RR-1) to Low- Density Multiple-Family (RU-2-6), based on the critical impacts to our community.

Zoning Incompatibility: The surrounding area is established as a lower density, rural residential community. Introducing multiple family high -density housing destroys the established neighborhood character and sets a damaging zoning precedent.

Traffic and Safety: Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create safety hazards.

Drainage and Wetland Preservation: This sector has known challenges with drainage, wetlands, and existing local crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks and damage sensitive local wetlands.

Please include this objection in the official case file and distribute it to all board members prior to the upcoming public hearing on June 15, 2026. I request that my opposition be noted in the official meeting minutes.

Thank you for your time, your service, and consideration of the community's safety and integrity.

Sincerely,

Christopher Pastirik

321.704.0881

cgpastirik@gmail.com

--

Chris Pastirik
1879 Oakwood Trl
Melbourne, FL 32934
321.704.0881

Christopher Pastirik
1879 Oakwood Trail
Melbourne Fl 32934
321.704.0881
cgpastirik@gmail.com

Subject: Formal Objection: Case 26Z00008 (Defender Homes Airway Heights LLC)

Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board

My name is Christopher Pastirik, and I reside at 1879 Oakwood Trail Melbourne Florida 32934, which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defenders Homes Airway Height LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6, and from Rural Residential to (RR-1) to Low- Density Multiple-Family (RU-2-6), based on the critical impacts to our community.

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Drainage and Wetland Preservation: This sector has known challenges with drainage, wetlands, and existing local crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks and damage sensitive local wetlands.

Please include this objection in the official case file and distribute it to all board members prior to the upcoming public hearing on June 15, 2026. I request that my opposition be noted in the official meeting minutes.

Thank you for your time, your service, and consideration of the community's safety and integrity.

Sincerely,
Christopher Pastirik
321.704.0881
cgpastirik@gmail.com

From: Melissa Pedrick <mpedrick68@gmail.com>

Sent: Monday, June 8, 2026 8:28 PM

To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>; Commissioner, D4 <D4.Commissioner@brevardfl.gov>; Commissioner, D3 <d3.commissioner@brevardfl.gov>; Commissioner, D2 <D2.Commissioner@brevardfl.gov>; Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Cc: Holton, Ashley <Ashley.Holton@brevardfl.gov>; Melissa Pedrick <mpedrick68@gmail.com>

Subject: Objection of Rezoning 1800 Turtle Mound Road

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

County Commissioners and Brevard County Planning and Zoning Board Coordinator,

I'm sending this email as an objection to the proposed rezoning of 1800 Turtle Mound Road, Melbourne, FL 32934 from RR-1 to RU-2-6 that will be discussed at the June 15, 2026 Brevard County Planning & Zoning Board.

I have lived in this area since 1979. My whole life this area has always been deemed horse country and the appeal of a minimum of one acre lots with a rural feel is the reason why I purchased my home in the Lake Washington area in 2016.

1. Turtle Mound Road/Aurora Roads are already congested from people using it as a shortcut to avoid Wickham Road. Adding the potential of 84 units with a couple hundred people will just compound this problem. Has a comprehensive traffic impact study been done to show the impacts?
2. Flooding – we all know how this area floods during storms. Add more concrete/asphalt to this corner and where will all the run-off go? The majority of this site lies within a significant wetland and floodplain. The majority of this property lies within a FEMA-designated Special Flood Hazard area.
3. Utilities capacity. Do we have the water capacity and sewer service to support the potential of 84 units?
4. I understand owners would like to develop their property. I have no issues if it was developed into a community that fits the area – minimum 1 acre lots with single family homes. It's quiet and rural out here. Adding apartments/townhomes will not have that rural quality of life Lake Washington area is known for.
5. If you have any knowledge of the area you govern, you are already aware of the type of people living in this area: retirees, business professionals, business owners. We all have the same things in common, a slower pace, rural atmosphere, pride in our property, and longevity. The kind of things renters don't have! We have money, we have

voices, we have the numbers and we have the time to make a difference. Catering and bowing to developers, particularly out of state developers, by changing the zoning will not end well for elected officials when election time comes around. We have had enough development in this area...just stop it already!

See you on June 15th.

Sincerely,

Melissa Pedrick

From: Kelly Rain <klrain@cfl.rr.com>

Sent: Monday, June 8, 2026 9:20 PM

To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>

Subject: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Subject: Formal Objection: Case 26Z00008 & Case 26S.02 – Defender Homes Airway Heights LLC

Dear Mr. Altman,

My name is Dr. Kelly Rain and I reside at 2590 Crooked Antler Dr. Melbourne 32934, which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6 and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

1. Zoning Incompatibility

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3. Drainage, Wetlands, and Flooding

This sector has known and documented challenges with drainage, wetlands, and existing crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks for surrounding properties and damage sensitive local wetlands. Where applicable, Florida Department of Environmental Protection and United States Army Corps of Engineers jurisdiction over any wetlands on or adjacent to this property must be fully evaluated and disclosed before this rezoning is considered.

4. Infrastructure and Utility Capacity

The existing water, sewer, and emergency services infrastructure in this area was not designed to accommodate the demands of a high-density multi-family development. No

approval should be granted without a full infrastructure capacity analysis confirming that existing systems can support this level of increased demand without negatively impacting current residents.

5. School Capacity

The addition of a high-density multi-family residential complex will place immediate and significant pressure on the enrollment capacity of local schools. The Board should require a school impact analysis prior to approval and coordinate with Brevard County Public Schools to assess whether existing facilities can absorb this growth.

6. Property Values

The proposed rezoning and resulting development will negatively impact the property values of surrounding residential homes. Residents have made long-term investments in this community based on its established rural residential character. Approving this rezoning undermines those investments and the reasonable expectations of the existing homeowners in this area.

I formally request the following:

That this objection be included in the official case file for Case 26Z00008 and Case 26S.02

That it be distributed to all Board members prior to the public hearing on June 15, 2026

That my opposition be noted in the official meeting minutes

That the Board require a full traffic impact study, infrastructure capacity analysis, school impact analysis, and wetlands evaluation before any vote is taken

That if the community has not had adequate time to organize and respond to this proposal, the Board grant a continuance to allow full public participation

Thank you for your time, service, and consideration of our community's safety, character, and integrity.

Sincerely,

Dr. Kelly Rain

2590 Crooked Antler Dr.

Melbourne 32934

(321) 543-6029

klrain@cfl.rr.com

From: [Gilliam, Trina](#)
To: [Kelly Rain](#)
Cc: [AdministrativeServices](#); [Craven, Tim](#); [Hughey, Derrick](#)
Subject: RE: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)
Date: Tuesday, June 9, 2026 1:03:03 PM

Good afternoon,

We have received your public comments. Administrative Services will ensure to include it in the rezoning packet for the Boards.

Best regards,

Trina Gilliam, MSURP
Planning and Zoning Manager
Brevard County Planning & Development Department
2725 Judge Fran Jamieson Way Bldg. A-114
Viera, FL 32940

Phone # (321-350-8273)

This office can only provide zoning and comprehensive plan information. You may wish to contact other County agencies to fully determine the development potential of this property. This letter does not establish a right to develop or redevelop the property and does not constitute a waiver to any other applicable land development regulations. At the time of development, this property will be subject to all such regulations. Under Florida law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing.

Registered users with an approved contractor license added, can apply for building permit applications, make payments and upload documents directly to your permit by using the online public portal.
Registered users of the online system without a contractor's license can schedule inspections.
Notice of Accessibility: If you require assistance to better access a document or information contained therein, please contact our office.

-----Original Message-----

From: Kelly Rain <klrain@icloud.com>
Sent: Monday, June 8, 2026 8:41 PM
To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>
Subject: Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Subject: Formal Objection: Case 26Z00008 & Case 26S.02 – Defender Homes Airway Heights LLC

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board,

My name is Dr. Kelly Rain and I reside at 2590 Crooked Antler Dr. Melbourne 32934, which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift

this property from RES 4 to RES 6 and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

1. Zoning Incompatibility

The surrounding area is an established lower-density rural residential community. Introducing multiple-family high-density housing directly contradicts the established neighborhood character, destroys the rural fabric of this corridor, and sets a damaging zoning precedent that will invite future high-density development throughout the area.

2. Traffic and Safety

Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create significant safety hazards for existing residents. I formally request that a comprehensive traffic impact study be required and made fully available to the public prior to any approval being considered by this Board.

3. Drainage, Wetlands, and Flooding

This sector has known and documented challenges with drainage, wetlands, and existing crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks for surrounding properties and damage sensitive local wetlands. Where applicable, Florida Department of Environmental Protection and United States Army Corps of Engineers jurisdiction over any wetlands on or adjacent to this property must be fully evaluated and disclosed before this rezoning is considered.

4. Infrastructure and Utility Capacity

The existing water, sewer, and emergency services infrastructure in this area was not designed to accommodate the demands of a high-density multi-family development. No approval should be granted without a full infrastructure capacity analysis confirming that existing systems can support this level of increased demand without negatively impacting current residents.

5. School Capacity

The addition of a high-density multi-family residential complex will place immediate and significant pressure on the enrollment capacity of local schools. The Board should require a school impact analysis prior to approval and coordinate with Brevard County Public Schools to assess whether existing facilities can absorb this growth.

6. Property Values

The proposed rezoning and resulting development will negatively impact the property values of surrounding residential homes. Residents have made long-term investments in this community based on its established rural residential character. Approving this rezoning undermines those investments and the reasonable expectations of the existing homeowners in this area.

I formally request the following:

That this objection be included in the official case file for Case 26Z00008 and Case 26S.02 That it be distributed to all Board members prior to the public hearing on June 15, 2026 That my opposition be noted in the official meeting minutes That the Board require a full traffic impact study, infrastructure capacity analysis, school impact analysis, and wetlands evaluation before any vote is taken That if the community has not had adequate time to organize and respond to this proposal, the Board grant a continuance to allow full public participation

Thank you for your time, service, and consideration of our community's safety, character, and integrity.

Sincerely,

Dr. Kelly Rain

2590 Crooked Antler Dr.

Melbourne 32934

(321) 543-6029

klrain@cfl.rr.com

From: Lisa Ream <lisakream1962@gmail.com>

Sent: Wednesday, June 3, 2026 9:55 AM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Subject: Subject: Formal Objection: Case 26Z00008 (Defender Homes Airway Heights LLC)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Ms. Gilliam,

My name is Lisa Ream, and I reside at 4185 Domain Ct., which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6, and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

Zoning Incompatibility: The surrounding area is established as a lower-density, rural residential community. Introducing multiple-family high-density housing destroys the established neighborhood character and sets a damaging zoning precedent.

Traffic and Safety: Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create safety hazards.

Drainage and Wetland Preservation: This sector has known challenges with drainage, wetlands, and existing local crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks and damage sensitive local wetlands.

Please include this objection in the official case file and distribute it to all board members prior to the upcoming public hearing on June 15, 2026. I request that my opposition be noted in the official meeting minutes. Thank you for your time, service, and consideration of the community's safety and integrity.

Sincerely,
Lisa Ream

From: debrarich@earthlink.net <debrarich@earthlink.net>

Sent: Thursday, June 4, 2026 11:51 AM

To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>

Subject: regarding rezoning of property at White Rd & Turtle mound Melbourne

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Just want to let you know that I am against the rezoning of this property.
We have enough traffic issues at the Aurora & Turtle mound intersection.

We do not need to increase the density in this area.
I learned about this from Nextdoor.

I appreciate your attention to this matter.
Debbie Rich

Sent using myEarthLink

From: Jeep Driver <jeepdriver1979@yahoo.com>
Sent: Tuesday, June 2, 2026 1:33 PM
To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>
Subject: Objection to rezoning

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

To:
Brevard County Planning and Zoning Board coordinator
From:
Life long resident
Archie Salters

Dear Sir,mam,
I strategically object to rezoning the 1800 block of Turlemound/ the old radio station pr0perty.

What is now rural and still spacious living zone where families have chosen to live for decades due to the space and slower pace of life in this area will drastically change and alter the home lofe of all its current people who reside there.

Properties wil be be devalued monetarily, but lore so devalued as to whom will want to buy there in the future..

Pleaaa add this objection to the list and please provide feed back for being added!

Thank you
Archie salters

From: [Schiffer](#)
To: [AdministrativeServices](#)
Cc: [Commissioner, D3](#); [Commissioner, D5](#); [Commissioner, D1](#); D2Commissioner@brevardfl.gov; [Commissioner, D4](#)
Subject: FORMAL OPPOSITION TO PROPOSED REZONING AND FUTURE LAND USE MAP AMENDMENT Subject Property: 1800 Turtle Mound Road, Melbourne, Florida Proposed Change: Zoning RR-1 → RU-2-6 | Future Land Use RES 4 → RES 6 ID# 26SS00002 and 26Z00008
Date: Friday, June 5, 2026 6:31:56 AM
Attachments: [26SS00002_26Z00008 - Objection to Rezoning by Fox Bay Resident.pdf](#)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Commissioner [Altman / Adkinson / Feltner / Goodson / Delaney],

I write on behalf of residents of the Fox Bay community to respectfully submit the attached letter in opposition to Case Nos. 26SS00002 (Small-Scale Future Land Use Map Amendment) and 26Z00008 (Rezoning Application) concerning the property at 1800 Turtle Mound Road, Melbourne, Florida.

Our concerns relate to the proposed changes' consistency with the Brevard County Comprehensive Plan, compatibility with the established character of the surrounding neighborhood, and the adequacy of the supporting analysis in the staff report. The attached letter sets forth our objections in detail.

We appreciate the Board's consideration of our comments and respectfully request that both applications be denied. We welcome the opportunity to address the Board at the public hearing on this matter.

Respectfully submitted,

Scott R Schiffer
1891 Fox bay Road
Melbourne, FL 32934

Scott R. Schiffer
Fox Bay Community Resident
1891 Fox Bay Drive
Melbourne, FL 32934
Tel.: (321) 961-7742
Email: sdm0sdm@gmail.com

June 5, 2026

VIA EMAIL AND U.S. CERTIFIED MAIL RETURN RECEIPT REQUESTED

TO: Brevard County Planning & Zoning Board / Local Planning Agency
c/o Alice Randall
Administrative Services Brevard County Planning and Development Department
2725 Judge Fran Jamieson Way, Suite 114
Viera, Florida 32940
AdministrativeServices@BrevardFL.gov

AND Brevard County Board of County Commissioners
2725 Judge Fran Jamieson Way
Viera, Florida 32940

**RE: FORMAL OPPOSITION TO PROPOSED REZONING AND FUTURE LAND USE
MAP AMENDMENT Subject Property: 1800 Turtle Mound Road, Melbourne, Florida
Proposed Change: Zoning RR-1 → RU-2-6 | Future Land Use RES 4 → RES 6**

ID# 26SS00002 and 26Z00008

Dear Members of the Planning & Zoning Board and Board of County Commissioners:

I write as a homeowner and resident of the Fox Bay community, located directly across Turtle Mound Road from the above-referenced subject property (the "Subject Property"), to formally oppose the pending application to rezone the Subject Property from RR-1 (Rural Residential) to RU-2-6 (Low-Density Multiple-Family Residential) and to amend its Future Land Use Map ("FLUM") designation from RES 4 to RES 6.

I wish to be clear at the outset that I am not opposed to responsible residential development of the Subject Property. I am opposed to **RU-2-6 zoning** — a multifamily classification that goes far beyond what the surrounding neighborhood warrants, far beyond what the developer's own stated purpose requires, and far beyond what the established zoning pattern on this corridor supports.

The developer has represented that the purpose of this application is to develop a "single-family detached or single-family attached residential" community. I accept that representation. But accepting it makes the case for denial of RU-2-6 **stronger**, not weaker — because Brevard County's zoning code already provides two classifications that are fully compatible with the

surrounding neighborhood and fully adequate for the developer's stated purpose, neither of which is RU-2-6.

Those two classifications are:

- **EU-2 (Estate Use Residential)** — the **exact zoning classification of Fox Bay**, located directly across Turtle Mound Road. EU-2 produces single-family detached homes on lots as small as 9,000 square feet, with a minimum floor area of 1,500 square feet. On 14.27 acres, EU-2 zoning would support approximately 69 single-family homes — a robust, viable, and profitable development that mirrors the Fox Bay neighborhood in character, scale, and land use pattern. By contrast, the current RR-1 zoning permits a maximum of approximately 14 homes at one-acre minimum lots — meaning EU-2 would deliver five times the unit count of RR-1, without requiring the multifamily classification the developer is seeking.
- **RA-2-6 (Single-Family Attached Residential)** — the purpose-built Brevard County classification for single-family attached townhome development. RA-2-6 requires platting of individual lots and detailed site plans, permanently locking in the townhome form and preventing any future conversion to apartments. It accommodates the developer's stated townhome purpose while providing legal protection to the community.

The developer has requested neither. Instead, the developer has requested RU-2-6 — a multifamily residential classification that authorizes full apartment and condominium development, and that provides no legal guarantee that townhomes, rather than apartments, will ever be built on this site. This is acknowledged in the Staff Report for 26SS00002 where it states that while “[a]ccording to the Applicant, the intention is to develop a single-family subdivision with 86 lots with single-family detached or single-family attached residential homes ... **this representation is nonbinding on the applicant and their successors in interest.**”

The gap between what the developer says they want and what they are actually asking for is not a technicality. It is the central issue in this proceeding.

My objections, and my proposed alternatives, are set forth in full below.

I. PRELIMINARY NOTE REGARDING THE STAFF REPORT

Before turning to the substantive merits, the undersigned respectfully wishes to bring a factual matter to the Board's attention that may warrant clarification prior to the Board's deliberations.

Upon reviewing the staff report prepared for this hearing, it appears the report incorrectly describes the Subject Property as being located to the **east** of Turtle Mound Road. *See* Staff Comments, 26SS00002, p. 1; Staff Comments, 26Z00008, p. 2.¹ The Subject Property is in fact located to the **west** of Turtle Mound Road.

¹ In addition to the geographic error discussed above, the undersigned notes two further apparent typographical errors in the staff reports that, while less consequential to the substantive analysis, should be corrected in any revised

The undersigned raises this not as a criticism of staff, but out of genuine concern that this geographic error may have affected certain site-specific portions of the analysis. In particular, traffic circulation patterns and ingress/egress analysis, as well as drainage and stormwater flow analysis, are inherently dependent on the correct orientation and positioning of the subject property. If the reports' geographic description is inaccurate, those conclusions may not accurately reflect conditions at the actual site.

The undersigned respectfully requests that staff confirm the correct location of the Subject Property at the outset of the hearing, so that the Board may be satisfied that all site-specific findings in the report are grounded in the property's actual location before proceeding to deliberations.

II. BACKGROUND

The Subject Property consists of approximately 14.27 acres located at 1800 Turtle Mound Road, Melbourne, Florida, currently zoned RR-1 (Rural Residential) under Brevard County Code § 62-1336, with a Future Land Use Map designation of RES 4 (maximum 4 units per acre). The developer seeks both a rezoning to RU-2-6 and a FLUM amendment to RES 6 (maximum 6 units per acre), representing on the record that the intended use is a single-family townhome development.

The Subject Property was formerly the site of radio station WMEL-AM (920 kHz), which operated at 1800 Turtle Mound Road as a legal nonconforming use under the RR-1 zoning classification. The station's license and call sign were transferred in 2008 and the transmitter was physically relocated off-site to Eau Gallie Boulevard in Melbourne. The nonconforming use rights have been extinguished by abandonment under Florida law.

The applicant purchased this vacant property in October 2021 with full knowledge of its RR-1 zoning and RES 4 Future Land Use designation.

The Fox Bay community, located directly across Turtle Mound Road from the Subject Property, is zoned **EU-2 (Estate Use Residential)** and carries a Future Land Use Map designation of **RES 6**. Fox Bay was developed as a single-family residential neighborhood — not as a multifamily or townhome development — under those designations.

III. THE ESTABLISHED FACTS — A TALE OF TWO SIDES OF THE ROAD

Before addressing the legal and planning arguments, it is worth setting out the verified facts side by side, because they tell the story more clearly than any argument:

reports. First, the staff reports contain an incorrect plat book reference for the Subject Property, i.e., the reports cite Plat Book 8, Page 86, when the correct reference is Plat Book 6, Page 86. Second, the staff reports misidentify the Future Land Use designation for the East Surrounding Area, i.e., Fox Bay, as RES 4, when the correct designation is RES 6. The undersigned raises these errors solely to ensure the accuracy of the record and does not suggest they affect the substantive planning analysis presented in the body of this letter.

	Fox Bay	Subject Property
Side of Turtle Mound Rd	East	West
Current Zoning	EU-2	RR-1
Current FLUM	RES 6	RES 4
Proposed Zoning	—	RU-2-6
Proposed FLUM	—	RES 6
Min. Lot Size	9,000 sq ft	1 acre (RR-1)
Development Type	Single-family detached	Vacant (former radio station)

The developer is asking this Board to approve the same FLUM designation that Fox Bay carries — RES 6 — but a **fundamentally different and more intensive zoning classification** than Fox Bay has ever had. Fox Bay thrives as a single-family neighborhood under EU-2 / RES 6. The developer wants RU-2-6 / RES 6 — a multifamily classification that has nothing in common with the EU-2 zoning that governs the established neighborhood directly across the street.

IV. PRIMARY POSITION: DENY BOTH THE FLUM AMENDMENT AND THE REZONING

A. The FLUM Amendment Lacks Required Planning Justification

Under Florida law and established planning practice, a Future Land Use Map amendment must be supported by a demonstration of either a material change in conditions since the current designation was established, or a planning mistake in the original designation. The developer can demonstrate neither.

The corridor has not transformed since the current designation was established. The only change is that radio station located on the Subject Property closed approximately 18 years ago — a fact that does not constitute a changed condition sufficient to justify amending the Comprehensive Plan. The developer's desire to build more units than RES 4 allows is a business preference, not a planning justification.

The developer has designated this application as a Small-Scale Comprehensive Plan Amendment under Florida Statute § 163.3187, which applies to FLUM amendments involving 50 acres or fewer. The Subject Property at 14.27 acres qualifies under this threshold. The undersigned acknowledges that the small-scale process does not require advance transmittal to or pre-adoption review by the Florida Department of Commerce, and that this Board and the BOCC may adopt the amendment following a single public hearing without prior state approval.

The undersigned also wishes to note, for the record, that the small-scale designation does not alter the substantive planning standards this amendment must satisfy. Under Florida Statute § 163.3187(5), affected persons — including neighboring property owners such as the residents of Fox Bay — retain the right to petition the Division of Administrative Hearings within 30 days of adoption to challenge a small-scale amendment's compliance with Florida's growth management requirements. Under § 163.3187(5)(c), a small-scale amendment may not become effective until 31 days after adoption, and if timely challenged, may not become effective until the state land

planning agency or the Administration Commission issues a final order determining that the amendment is in compliance.

The undersigned raises these procedural realities not as a challenge to this Board's authority, but simply to ensure the record reflects that the residents of Fox Bay are familiar with the applicable process and intend to remain engaged throughout it. The undersigned respectfully encourages the Board to evaluate this amendment on its full planning merits, i.e., whether this amendment is consistent with Florida's growth management requirements and Brevard County's Comprehensive Plan, as the record developed in this proceeding will be the foundation for any further review.

B. The RR-1 Zoning Is Appropriate and Should Be Maintained

Under current RR-1 zoning, the minimum lot size is one acre, meaning the Subject Property's 14.27 acres can support a maximum of approximately 14 single-family homes — one per acre. That is the binding constraint of the RR-1 classification; the RES 4 Future Land Use designation sets a density ceiling of 4 units per acre, but the RR-1 zoning is the more restrictive standard and controls. Fourteen single-family homes on 14.27 acres is a low-density, rural residential outcome — precisely what the RR-1 classification was designed to produce, and precisely what the surrounding corridor reflects. The developer purchased this property knowing its designations. Self-created hardship — acquiring land at a price that only produces a return if more favorable zoning is granted — is not a valid basis for a rezoning under Florida law. The fact that 14 homes may be less profitable than 84 units is the developer's problem, not this community's problem to solve through a rezoning.

C. The Abandoned Nonconforming Use Provides No Basis for Upzoning

Radio station WMEL-AM operated at 1800 Turtle Mound Road as a legal nonconforming use. When the license was transferred in 2008 and the transmitter relocated off-site, the nonconforming use was permanently abandoned. The prior commercial broadcast use cannot be relied upon to justify greater residential intensity. If anything, its elimination is an opportunity to bring the Subject Property into full conformity with the surrounding residential character — not to exploit its prior nonconformity as a pretext for upzoning.

V. FIRST ALTERNATIVE: IF ANY CHANGES ARE CONSIDERED, APPROVE RES 6 FLUM ONLY WITH EU-2 ZONING

If this Board is inclined to consider any changes at all, the **first and most appropriate alternative** is to approve a FLUM amendment to RES 6 — acknowledging the existing RES 6 designation on the Fox Bay side of the road — but to pair that amendment exclusively with **EU-2 zoning**, mirroring the established classification of Fox Bay.

A. EU-2 Is the Exact Zoning of Fox Bay

EU-2 is not a novel or experimental zoning classification for this corridor. It is exactly what Fox Bay is zoned today. Applying EU-2 to the Subject Property would produce a development that is, by definition, compatible with the established neighborhood standard — because it would be

governed by the same rules, the same minimum lot sizes, the same setbacks, and the same permitted uses that govern every lot in Fox Bay.

Under EU-2 zoning, the Subject Property could support approximately 69 single-family detached homes on 9,000 square foot minimum lots across 14.27 acres. That is a robust, viable development — representing a six-fold increase over the 14 homes currently permissible under RR-1 zoning, and perfectly matched to the Fox Bay neighborhood pattern.

B. EU-2 Is More Protective Than Any Other Alternative

EU-2 is the most neighborhood-protective zoning alternative available, for three reasons:

First, it **permits only single-family detached dwellings** — there is no path to apartments, condominiums, or even townhomes under EU-2. The development form is permanently locked in as individual homes on individual lots, indistinguishable in character from Fox Bay.

Second, it **requires a minimum floor area of 1,500 square feet** per dwelling unit, ensuring that any homes built are of meaningful size and quality consistent with the existing neighborhood.

Third, it **carries a maximum building height of 35 feet**, consistent with the residential scale of Fox Bay and preventing the multi-story building forms that multifamily development can produce.

C. If the Developer Refuses EU-2, That Refusal Is Itself Telling

This Board should put the question directly to the developer on the record: *Will you accept EU-2 zoning — the same classification as Fox Bay — in lieu of RU-2-6?*

EU-2 would allow the developer to build approximately 69 single-family homes on this site under a RES 6 FLUM — a fully viable and profitable project by any standard. If the developer refuses EU-2, they have refused the exact zoning of the neighborhood directly across the street. That refusal tells this Board everything it needs to know about the true intent behind this application.

VI. SECOND ALTERNATIVE: IF EU-2 IS NOT ACCEPTED, CONSIDER RA-2-6 WITH A BINDING DEVELOPMENT PLAN

If this Board concludes that the developer's stated townhome purpose has independent merit that EU-2 cannot accommodate, the **second alternative** is to consider **RA-2-6 (Single-Family Attached Residential)** — the purpose-built Brevard County classification for townhome development — paired with a Binding Development Plan.

A. RA-2-6 Is the Correct Classification for Townhomes — Not RU-2-6

Brevard County Code § 62-1343 establishes the RA-2 series of zoning classifications specifically and exclusively for single-family attached residential development — the legal planning term for townhomes. The RA-2 classifications were designed precisely for this use. They require platting

of individual lots and detailed site plans tailored to townhome communities. They produce exactly what the developer says they want to build.

The developer has not requested RA-2-6. The developer has requested **RU-2-6 — a multifamily residential classification** that encompasses full apartment and condominium development. This appears to be a deliberate choice to obtain a classification that authorizes far more than townhome development requires or justifies.

B. The Critical Difference Between RU-2-6 and RA-2-6

The difference is fundamental, not semantic:

RU-2-6 (what the developer requests):

- A multifamily residential classification
- Permits full apartment buildings and condominium complexes as of right
- Permits townhomes as one option among many, with no requirement that they be built
- Carries no platting requirement that permanently locks in a townhome pattern
- Runs with the land — any future owner can build apartments without returning to this Board
- Permits building heights up to 45 feet when abutting comparable classifications

RA-2-6 (the townhome classification):

- A single-family attached residential classification designed exclusively for townhomes
- Permits only single-family attached dwellings — no apartments, no multifamily complexes
- Requires platting of individual lots — each unit is permanently locked in as a for-sale home
- Requires detailed site plan submitted simultaneously with platting
- Permanently prevents conversion to apartments regardless of future ownership
- Provides the neighborhood-protective development standards appropriate to townhome communities

If the developer's representation about townhomes is genuine, RA-2-6 gives them everything they need. The only thing RA-2-6 denies them is the future option of building apartments — and if they truly intend only townhomes, that should be no loss at all.

C. Required Conditions If RA-2-6 Is Considered

If this Board considers RA-2-6 as an alternative, the following minimum conditions should be required through a **Binding Development Plan**, enforceable against all future owners:

1. Maximum unit count not to exceed the density supportable under RES 6 at 6 units per acre
2. Maximum building height of 35 feet, consistent with EU-2 and the Fox Bay neighborhood scale
3. Minimum unit floor area of 1,500 square feet, consistent with EU-2 standards
4. Landscaping and buffering standards along the Turtle Mound Road frontage

5. A traffic impact study demonstrating that Turtle Mound Road can accommodate the development
6. Confirmation of adequate water, sewer, and infrastructure capacity

D. If the Developer Refuses RA-2-6 As Well, the Application Must Be Denied

If the developer rejects both EU-2 and RA-2-6 — the two classifications that are genuinely appropriate for this site and this neighborhood — this Board will have its answer. A developer who refuses the zoning classification of the neighboring community (EU-2) and the purpose-built townhome classification (RA-2-6) in favor of a multifamily classification (RU-2-6) is not planning a townhome community. They are preserving maximum future flexibility for the most intensive development this corridor has ever seen. This Board should deny the application in its entirety if that is the developer's position.

VII. RU-2-6 MUST BE DENIED UNDER ANY CIRCUMSTANCES

Regardless of what this Board decides on the FLUM amendment, and regardless of the developer's representations about townhomes, the rezoning to **RU-2-6 must be denied** for the following independent and cumulative reasons:

1. **It is the wrong classification.** RU-2-6 is a multifamily classification. EU-2 and RA-2-6 are the appropriate classifications for this site. There is no legitimate planning reason to grant a multifamily classification when single-family alternatives are fully adequate for the stated purpose.
2. **It provides no neighborhood protection.** A developer's verbal representation of townhome intent is not binding on future owners. Once RU-2-6 is on the books, apartments are permitted as of right — forever.
3. **It is incompatible with the established neighborhood zoning pattern.** Fox Bay — directly across the street — is EU-2. RU-2-6 is a fundamentally different and more intensive classification with no precedent on this corridor.
4. **It sets a dangerous corridor-wide precedent.** Approving RU-2-6 under RES 6 Future Land Use on this site could be used to justify multifamily rezoning applications throughout the Turtle Mound corridor.
5. **It exceeds the developer's stated purpose.** The developer says they want townhomes. RA-2-6 delivers townhomes. EU-2 delivers single-family homes. RU-2-6 delivers everything up to and including full apartment complexes. The excess is unexplained and unjustified.

VIII. INFRASTRUCTURE, TRAFFIC, AND PUBLIC SERVICES

A. Traffic Impact — No Study Has Been Submitted

It appears that the application has not been accompanied by a comprehensive traffic impact study. Regardless of whether the proposed development is apartments, townhomes, or single-family

homes — any significant residential development on a currently vacant 14-acre parcel requires this analysis. Before any rezoning or FLUM amendment is approved, the Board should require answers to the following questions on the record:

- What is the projected daily and peak-hour vehicle trip generation from the proposed development?
- Can Turtle Mound Road safely accommodate that volume, particularly at its intersections with Wickham Road, Aurora Road, and Eau Gallie Boulevard?

The absence of a traffic impact study is itself an independent basis for deferring or denying this application.

B. Potable Water and Sanitary Sewer — The Staff Report Confirms Capacity Has Not Been Verified

This is not a concern raised only by neighboring property owners. It is a deficiency identified by the **county's own staff**, in the staff report submitted for this hearing. The staff report states, in relevant part:

"The proposed development is within access to centralized sewer and centralized water from the City of Melbourne Utilities. However, the applicant has not submitted acknowledgement letters from the City of Melbourne to verify they have the capacity to provide service."

And further:

"Centralized public water service is within the boundaries of the property, and the applicant's request equals a density of 6 units per acre. The applicant has not provided acknowledgement letters from the City of Melbourne to verify that they have the capacity and availability to provide potable water and sanitary sewer to the proposed development."

These findings by county staff are unambiguous: the developer has not confirmed that the City of Melbourne can serve this project. This Board is being asked to approve a rezoning and FLUM amendment for a development whose utility feasibility has not been verified by the only entity capable of verifying it — the City of Melbourne itself.

Access is not capacity. The staff report confirms that centralized water and sewer are within access of or within the boundaries of the property. But the presence of a water main or sewer line near a property does not mean the municipal system has the capacity to serve 84 new residential connections at the requested density of 6 units per acre. Capacity is a separate and independent question — one that only the City of Melbourne can answer, and one that the developer has not asked them to answer.

This is a Florida concurrency requirement. Florida's Growth Management Act — Chapter 163, Florida Statutes — establishes the doctrine of concurrency: public infrastructure and services must be available concurrent with the impacts of new development. Potable water and sanitary sewer are among the core concurrency requirements under Florida law. A development cannot

responsibly be approved if adequate utility capacity has not been confirmed. The developer's failure to obtain acknowledgement letters from the City of Melbourne is not a minor paperwork deficiency — it is a failure to satisfy a fundamental prerequisite for development approval under Florida law.

The developer has not done basic due diligence. Filing a rezoning and FLUM amendment application without first confirming that the utility provider can serve the proposed project is not responsible development practice. This Board should not be placed in the position of approving a zoning entitlement whose utility feasibility is unconfirmed. The burden is on the developer — not the county and not the neighboring community — to demonstrate that this project can be served before asking for a rezoning.

Capacity verification must await resolution of the environmental constraints. As detailed in Section IX of this letter, the county's own NRM staff has identified significant wetland and SFHA constraints that may reduce the net buildable area of the Subject Property to a fraction of the 14.27-acre gross figure used in the developer's density calculations. The achievable unit count after accounting for those constraints may be substantially lower than 84 units. Utility capacity should be verified for the **net achievable density** — not for a gross acreage-based figure that the environmental constraints may make impossible to realize. Verifying capacity for 84 units before the wetland delineation and SFHA analysis are complete risks producing a misleading capacity determination that does not reflect what can actually be built on this site.

This Board should require — before taking any action on this application — written acknowledgement letters from the City of Melbourne Utilities confirming:

1. The available capacity of the City's water distribution system to serve the proposed development at the requested density of 6 units per acre on 14.27 gross acres.
2. The available capacity of the City's sanitary sewer collection and treatment system to serve the proposed development at the requested density.
3. The conditions, if any, under which the City will provide service — including any required infrastructure improvements, capacity reservation fees, or connection moratoriums that may affect project feasibility.
4. Whether the City's capacity confirmation is contingent on a specific unit count, and if so, whether a revised unit count resulting from environmental constraint analysis would require a new capacity determination.

The absence of these letters is an independent and sufficient basis for deferring this application until they are obtained and reviewed.

IX. ENVIRONMENTAL CONSTRAINTS, DRAINAGE, STORMWATER, AND CROWN ELEVATION IMPACTS

The environmental and drainage constraints affecting the Subject Property represent what may be the single most powerful independent basis for denial of this application — and critically, these constraints are not asserted only by neighboring property owners. They are identified in the **county's own staff report**, through comments submitted by Brevard County's Natural Resources

Management (NRM) department. The NRM comments confirm that this property is subject to a constellation of overlapping environmental and floodplain regulations that severely limit what can lawfully be built here — and that the developer has submitted no analysis demonstrating the proposed density is achievable within those constraints.

This Board should give the NRM comments their full weight. They are not the opinion of an objecting neighbor. They are the professional findings of the county's own environmental staff, and they raise fundamental questions about whether this project can be built at all at the density requested — questions that must be answered before any rezoning or FLUM amendment is approved.

A. The Staff Report's Own NRM Comments Confirm the Property Is Severely Constrained

The staff report submitted for this hearing contains the following findings from Brevard County's Natural Resources Management department, quoted directly:

"NRM comments identify several environmental and floodplain development constraints affecting the subject property. Pursuant to Section 62-3694(c)(1), residential land uses within wetlands are limited to no more than one (1) dwelling unit per five (5) acres. For subdivisions and multi-family developments exceeding five acres in size, Section 62-3694(c)(6) allows this limitation to be applied as a maximum percentage, restricting cumulative wetland impacts to no more than 1.8% of the total non-commercial and non-industrial acreage. Additionally, a majority of the property is located within a FEMA-designated Special Flood Hazard Area (SFHA A), as identified on the FEMA Flood Insurance Rate Map. Pursuant to Section 62-3724(3)(d), compensatory storage is required for fill exceeding that necessary to establish an upland buildable area greater than one-third (1/3) acre within the isolated floodplain. Chapter 62, Article X, Division 6 further provides that 'No site alteration shall adversely affect the existing surface water flow pattern,' while Section 62-3723(2) requires that development within floodplain areas not adversely impact adjoining properties."

This Board's own staff has identified five distinct and overlapping regulatory constraints on this property. The undersigned addresses each in turn below — and urges this Board to recognize that together, they raise a threshold question that must be answered before any rezoning is granted: **can this project actually be built at the requested density under applicable environmental law?**

B. Wetland Density Limitation — § 62-3694(c)(1) and (c)(6)

Section 62-3694(c)(1) limits residential land uses within wetlands to no more than one dwelling unit per five acres. On the Subject Property's 14.27 gross acres, if the entirety were wetland, the maximum permitted residential density under this provision would be approximately two to three dwelling units — not the 57 to 84 units the developer's application contemplates.

The staff report acknowledges the multifamily exception under § 62-3694(c)(6), which for subdivisions and multifamily developments exceeding five acres permits the wetland limitation to be applied as a maximum percentage, restricting cumulative wetland impacts to no more than 1.8% of the total non-commercial and non-industrial acreage. On 14.27 acres, 1.8% equals

approximately 0.257 acres — less than one-quarter of an acre of total permitted wetland impact across the entire development.

This constraint is of profound significance for the density analysis underlying this application. The developer's stated unit counts — whether up to 84 under the proposed RES 6, or the up to 57 units theoretically permitted under RES 4 FLUM density if zoning were changed to accommodate it (noting that RR-1 zoning itself limits the property to approximately 14 homes) — are calculated on the basis of gross acreage. They do not account for the reduction in net buildable area caused by wetland constraints. If the Subject Property contains significant wetland acreage — and the fact that NRM raised § 62-3694 strongly suggests it does — the actual buildable upland area available for development may be a small fraction of the 14.27-acre gross figure.

The developer has submitted no wetland delineation, no environmental survey, and no analysis of how the wetland density limitation affects the achievable unit count on this property. Until a formal wetland delineation is prepared by a qualified environmental consultant, reviewed by NRM, and incorporated into the density analysis, the unit counts presented to this Board are speculative and unreliable. This Board cannot responsibly approve a rezoning based on a density assumption that has not been tested against the wetland constraints the county's own staff has identified.

C. FEMA Special Flood Hazard Area — Zone A Covers a Majority of the Property

The NRM comments confirm that a majority of the Subject Property is located within a FEMA-designated Special Flood Hazard Area, Zone A. This is not a peripheral or minor constraint — it covers most of the site. The implications are severe and multi-layered:

- The property has a 1% annual chance of flooding — the so-called 100-year flood — and a 26% chance of flooding over the life of a 30-year mortgage
- All new construction must be elevated to or above the applicable Base Flood Elevation (BFE), requiring substantial fill across most of the site
- Flood insurance will be mandatory for any mortgage-financed purchase of units on this property, adding a recurring cost burden that affects marketability and affordability
- The Zone A designation triggers the compensatory storage requirement addressed in Sub-argument D below
- Combined with the wetland constraints identified in Sub-argument B, the SFHA coverage dramatically reduces the net area of the property that can be developed without regulatory conflict

The developer has submitted no FEMA flood zone analysis, no Base Flood Elevation determination, and no assessment of the finished floor elevation requirements that will govern construction. This information is essential to any honest evaluation of what can be built on this property and at what density.

D. Compensatory Storage Requirement — § 62-3724(3)(d) — A Potential Engineering Impossibility at the Requested Density

This is among the most technically significant constraints identified by NRM. Section 62-3724(3)(d) requires compensatory storage for fill exceeding that necessary to establish an upland buildable area greater than one-third (1/3) acre within the isolated floodplain. In plain terms: every cubic yard of fill the developer places within the SFHA beyond what is needed to create a one-third acre upland pad must be offset by an equal volume of compensatory stormwater storage elsewhere on the site.

The practical consequence on this property is potentially crippling to the developer's density ambitions. Consider the sequence:

- A majority of the site is in Zone A SFHA, meaning most of the site requires fill to achieve FEMA-required finished floor elevations.
- The more the developer fills, the more compensatory storage volume they must provide.
- Compensatory storage requires land — typically in the form of detention or retention ponds.
- But the wetland impact limitation of § 62-3694(c)(6) restricts the developer to disturbing no more than 0.257 acres of wetland total.
- And the SFHA coverage means that much of the remaining land is also constrained.

This creates a regulatory circularity: the developer needs fill to build, but fill requires compensatory storage, but compensatory storage requires land, but the available land is constrained by wetlands and SFHA coverage. The net result may be that even the lesser density of 14 to 84 units contemplated under various zoning scenarios is physically unachievable on this site at the upper ranges under applicable environmental regulations — regardless of what zoning classification this Board approves.

The developer has submitted no compensatory storage calculations, no floodplain fill volume analysis, and no engineering demonstration that the site can accommodate both the proposed development footprint and the compensatory storage volumes required by § 62-3724(3)(d). Approving a rezoning based on a density assumption that has not been tested against this constraint is not responsible land use planning — it is granting a zoning entitlement that may never be exercised because the project cannot be engineered to comply with existing law.

E. Prohibition on Adverse Alteration of Surface Water Flow — Chapter 62, Article X, Division 6

The staff report quotes Brevard County Code directly: "**No site alteration shall adversely affect the existing surface water flow pattern.**" This is an absolute prohibition — not a standard to be balanced, mitigated, or traded off, but a flat and unconditional requirement.

On a property where a majority of the land is in Zone A SFHA and significant wetlands are present, the existing surface water flow pattern almost certainly reflects the natural sheet flow, infiltration, and detention functions that the wetlands and floodplain provide. **This is not idle land — it is**

land that performs an active stormwater management function for the surrounding area, including Turtle Mound Road and the Fox Bay community to the east. Development that fills, grades, and covers this land with impervious surfaces — rooftops, driveways, internal roads, parking areas — will by definition alter those flow patterns.

This prohibition directly reinforces the crown elevation concerns raised throughout this letter. If the natural flow pattern currently moves water away from Fox Bay, holds it on the Subject Property, or disperses it through wetland infiltration, development that redirects that flow toward Turtle Mound Road and the Fox Bay community is a direct and unambiguous violation of Brevard County Code. The developer has submitted no surface water flow analysis, no pre-development drainage pattern mapping, and no post-development flow comparison. This Board should not approve development on a site with this level of environmental constraint without that analysis firmly in hand.

F. Prohibition on Adverse Impact to Adjoining Properties Within the Floodplain — § 62-3723(2)

Section 62-3723(2) requires that **development within floodplain areas not adversely impact adjoining properties**. The staff report confirms the Subject Property is predominantly within a SFHA. Fox Bay is the adjoining property. The legal obligation to protect Fox Bay from adverse floodplain development impacts is therefore not merely a general planning consideration — it is a specific, enforceable code requirement that applies directly to any development on this site.

Any development on a predominantly SFHA parcel that increases flood risk to adjoining properties, redirects stormwater toward those properties, reduces the natural floodplain storage capacity of the site, or accelerates runoff across Turtle Mound Road toward Fox Bay is a direct violation of § 62-3723(2). The burden is on the developer to demonstrate compliance — with engineering, not promises. That demonstration has not been made.

G. Crown Elevation and the 25-Year Flood Stage Standard — § 62-3756

Brevard County Code § 62-3756 mandates that streets shall be designed so that the lowest crown elevation is at or above the 25-year peak flood stage. Given that a majority of the Subject Property is in Zone A SFHA, the relationship between the proposed development's finished grades, the crown elevation of Turtle Mound Road, and the grades within Fox Bay is a critical engineering variable. If development fill raises the western side of Turtle Mound Road's drainage corridor while Fox Bay's eastern side remains at natural grade, stormwater that previously dispersed across the Subject Property may be redirected eastward across Turtle Mound Road into Fox Bay — directly increasing flood risk for Fox Bay homeowners in violation of both § 62-3756 and § 62-3723(2).

This concern is not speculative. It is the predictable consequence of filling a predominantly SFHA parcel adjacent to an existing residential community, and it is precisely the kind of impact that § 62-3723(2) and the surface water flow prohibition of Chapter 62, Article X, Division 6 are designed to prevent. No engineering analysis addressing this risk has been submitted with this application.

H. The Impervious Surface Problem — Compounding an Already Constrained Site

The Subject Property is currently vacant land — a stormwater absorption area with no significant impervious surfaces, performing a natural detention function that benefits the surrounding corridor. A development of even 14 to 84 residential units — depending on the zoning classification ultimately applied — will introduce substantial impervious coverage: rooftops, driveways, internal roads, sidewalks, and common area paving. Brevard County Code requires that post-development stormwater runoff rates not exceed pre-development rates. On a site where the pre-development condition includes significant wetlands and SFHA floodplain performing active natural stormwater functions, the baseline for this comparison is not zero — it is the substantial natural stormwater management capacity of the existing site. The developer must demonstrate that the proposed development can achieve a runoff-neutral outcome against that baseline. No such demonstration has been made.

I. The SJRWMD Environmental Resource Permit — A Separate Regulatory Gauntlet

Any stormwater management system serving this development should require an Environmental Resource Permit (ERP) from the St. Johns River Water Management District (SJRWMD) — a separate regulatory approval process entirely independent of the county's rezoning and site plan review. SJRWMD ERP review will scrutinize the wetland impacts, compensatory storage volumes, stormwater treatment design, and Indian River Lagoon water quality protection measures in detail. Given the site's documented wetland constraints, SFHA coverage, and shallow water table (2 to 8 feet in this region), SJRWMD ERP approval at the requested density is far from guaranteed. This Board should not approve a rezoning that assumes a density the SJRWMD permitting process may not allow.

J. The Overarching Conclusion: This Application Is Premature

The NRM comments in the staff report do not merely raise concerns about how this development should be designed. They raise a threshold question about whether this development can be built at the requested density at all under applicable environmental law. The convergence of wetland density limitations, SFHA compensatory storage requirements, surface water flow prohibitions, and adjoining property protection requirements may render the developer's proposed unit counts physically and legally unachievable on this site — regardless of what zoning classification this Board approves.

Granting a rezoning and FLUM amendment based on density assumptions that have not been tested against these constraints is putting the cart before the horse. It grants the developer a zoning entitlement worth substantial money while leaving the environmental questions to be resolved — or not — at site plan review, by which time the rezoning is already approved and the county's leverage to require meaningful project changes is severely diminished.

The right sequence is the reverse: resolve the environmental constraints first, determine the net buildable area and achievable density under applicable law, and then evaluate whether a rezoning and FLUM amendment are warranted for a project that can actually be built. The current application inverts that sequence to the developer's advantage and the community's detriment.

L. Minimum Documentation Required Before Any Approval

The undersigned respectfully urges this Board to require — as a condition of any further consideration of this application — the following documentation, each prepared by a qualified professional and reviewed by the appropriate county departments:

1. A **formal wetland delineation** prepared by a qualified environmental consultant and reviewed by NRM, identifying the precise acreage and location of all wetlands on the Subject Property and the resulting net buildable upland area available for development within the § 62-3694(c)(6) wetland impact limitation.
2. A **FEMA flood zone and Base Flood Elevation analysis** confirming the Subject Property's SFHA boundaries, applicable BFEs, and the finished floor elevation requirements that will govern construction.
3. A **compensatory storage analysis** prepared by a Florida-licensed professional engineer, calculating the fill volumes required to achieve FEMA-compliant finished floor elevations and the corresponding compensatory storage volumes required under § 62-3724(3)(d), and demonstrating that adequate land exists on the site to accommodate both development and compensatory storage at the proposed density.
4. A **surface water flow analysis** demonstrating that the proposed development will not adversely affect existing surface water flow patterns in violation of Chapter 62, Article X, Division 6, including a specific analysis of the crown elevation relationship between the Subject Property, Turtle Mound Road, and the Fox Bay community.
5. A **floodplain impact analysis** demonstrating that the proposed development will not adversely impact the adjoining Fox Bay community in violation of § 62-3723(2), including pre- and post-development flood surface comparisons.
6. A **stormwater management plan** demonstrating that post-development runoff rates will not exceed pre-development rates, accounting for the natural stormwater detention function currently performed by the site's wetlands and floodplain areas.
7. A **preliminary SJRWMD ERP feasibility assessment** confirming that the proposed development density and form can be engineered to meet SJRWMD Environmental Resource Permit requirements.

The absence of any of these studies in the current application is not a minor procedural gap. It is a fundamental failure to demonstrate that this development can be built without violating applicable environmental law, harming the Fox Bay community, or damaging the Indian River Lagoon. This application should not proceed until these questions are answered.

X. SUMMARY OF POSITIONS

To assist this Board in evaluating the arguments set forth above, I summarize my positions as follows:

Primary Position — Deny Both: Deny the FLUM amendment (RES 4 → RES 6) and deny the rezoning (RR-1 → RU-2-6). The current RR-1 zoning limits the property to approximately 14 single-family homes on one-acre lots — the appropriate, rural-residential outcome for this

corridor. The developer created its own hardship by purchasing land with knowledge of its zoning, and no changed conditions justify amending the Comprehensive Plan. The proposed six-fold density increase from 14 to 84 units is not a planning decision — it is a profit maximization decision, and it is not this community's burden to bear.

First Alternative — RES 6 FLUM with EU-2 Zoning: If any changes are considered, approve a FLUM amendment to RES 6 only if paired with EU-2 zoning — the exact classification of Fox Bay — producing single-family detached homes at a scale and character fully compatible with the established neighborhood. Ask the developer on the record whether they will accept EU-2. Their answer will be instructive.

Second Alternative — RES 6 FLUM with RA-2-6 Zoning and a Binding Development Plan: If EU-2 is not accepted, consider RA-2-6 zoning — the purpose-built townhome classification — paired with a Binding Development Plan specifying maximum unit count, maximum building height of 35 feet, minimum floor area of 1,500 square feet, traffic impact study requirements, and infrastructure capacity confirmation. Ask the developer on the record whether they will accept RA-2-6. Their answer will be equally instructive.

Absolute Red Line — Deny RU-2-6 Under Any Circumstances: RU-2-6 is the wrong classification for this site, provides no neighborhood protection, is incompatible with the EU-2 zoning of Fox Bay directly across the street, exceeds the developer's stated purpose, and sets a precedent that threatens the character of the entire Turtle Mound Road corridor. It must be denied regardless of what this Board decides on the FLUM amendment or on the alternative zoning classifications.

Threshold Requirement — Defer Any Action Until Minimum Submissions Are Complete: Regardless of the Board's ultimate position on the merits, this application should not be approved — or even fully deliberated — until the following minimum submissions have been received and reviewed by appropriate county staff: (1) written acknowledgement letters from the City of Melbourne Utilities confirming water and sewer capacity at the proposed density, as identified as missing in the staff report; (2) a formal wetland delineation reviewed by NRM; (3) a FEMA Base Flood Elevation determination and compensatory storage analysis; (4) a surface water flow and floodplain impact analysis demonstrating no adverse effect on Fox Bay; (5) a traffic impact study; and (6) a preliminary SJRWMD ERP feasibility assessment. The staff report itself identifies several of these as missing. This Board should not approve a rezoning whose environmental, utility, and traffic feasibility is unverified.

XI. CONCLUSION AND REQUEST FOR DENIAL

For all of the reasons set forth above, I respectfully but firmly urge this Board to recommend **denial** of the proposed rezoning from RR-1 to RU-2-6, and **denial** of the proposed FLUM amendment from RES 4 to RES 6, with the alternative positions set forth in Section X above available to this Board if it concludes that some form of development accommodation is warranted.

I respectfully request that this letter be made part of the official record of the proceedings concerning the Subject Property. I also request written notification of the date and time of any public hearing at which this application will be considered, and I intend to appear and testify in opposition at that hearing.

I further encourage my neighbors in the Fox Bay community and all affected property owners within 500 feet of the Subject Property to submit their own written opposition and to attend the public hearing. The Fox Bay community's EU-2 zoning and RES 6 FLUM designation give every Fox Bay homeowner a direct and personal stake in how this Board resolves the question of what RES 6 zoning means on Turtle Mound Road.

Thank you for your consideration.

Respectfully submitted,



Scott R. Schiffer
Fox Bay Community Resident
1891 Fox Bay Drive
Melbourne, FL 32934
Tel.: (321) 961-7742
Email: sdtm0sdtm@gmail.com

cc: *Commissioner Kim Adkinson, Brevard County Commission District 3, 2725 Judge Fran Jamieson Way, Viera, Florida 32940, D3.Commissioner@BrevardFL.gov*

Commissioner Thad Altman, Chair, District 5 Brevard County Board of County Commissioners, 2725 Judge Fran Jamieson Way, Viera, Florida 32940 D5.Commissioner@BrevardFL.gov

Commissioner Katie Delaney, District 1 Brevard County Board of County Commissioners, 2725 Judge Fran Jamieson Way, Viera, Florida 32940, D1.Commissioner@BrevardFL.gov

Commissioner Tom Goodson, District 2 Brevard County Board of County Commissioners, 2725 Judge Fran Jamieson Way, Viera, Florida 32940, D2.Commissioner@BrevardFL.gov

Commissioner Rob Feltner, District 4 Brevard County Board of County Commissioners, 2725 Judge Fran Jamieson Way, Viera, Florida 32940, D4.Commissioner@BrevardFL.gov

NOTE: This letter is submitted in opposition to the pending rezoning and FLUM amendment application ID# 26SS00002 and 26Z00008. The undersigned reserves the right to supplement this

letter with additional arguments, evidence, and testimony prior to and at any public hearing on this matter. Nothing in this letter should be construed as a waiver of any legal rights or remedies available to the undersigned or other affected property owners, including without limitation the right to file a petition with the Division of Administrative Hearings pursuant to Florida Statute § 163.3187(5) within 30 days of any adoption of a small-scale FLUM amendment by the Board of County Commissioners, and to seek a stay of effectiveness of any such amendment during the pendency of such a challenge.

From: Jacob Smith <personal.jms2000@gmail.com>
Sent: Tuesday, June 2, 2026 10:35 PM
To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>
Subject: Rezoning Notice 26Z00008 - 1800 Turtle Mound Road

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Commissioner Altman,

My name is Jacob Smith and I am a resident of your 5th District. The Brevard County Planning and Zoning Board is hearing out the request to rezone 1800 Turtle Mound Road to be for low-density multiple-family.

It is unacceptable for this location to be zoned for anything other than rural residence. This region of Melbourne does not have the infrastructure to support so many dwellings being constructed. Traffic through this area of Turtle Mound is already very bad, through many parts of the day, supporting the commutes of so many neighborhoods into the business districts of the city and out to the highway.

I ask that you please support your constituents with ensuring this rezoning is not approved.

Jacob Smith
2567 Woodsmill Drive
Melbourne, FL 32934

From: Jean Smith <jeansmith750@msn.com>
Sent: Friday, June 5, 2026 9:24 PM
To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>
Subject: Proposed building turtlemound Road

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

I live on Pepper Drive, which is in the trailer park directly behind the old radio station. To develop this land the way it is being proposed as preposterous, the traffic alone would be ridiculous. There are enough speeders on White Street as it is and to add more traffic to Turtlemound and Aurora Road is just asking for problems.

Jean Smith
24 Pepper Dr
Melbourne FL 32934
321-591-6979
Sent from my iPhone

From: [Smith, Susan](#)
To: [AdministrativeServices](#)
Cc: [Commissioner, D2](#)
Subject: Public Comments - Defender Homes Airway Heights LLC
Date: Friday, June 5, 2026 4:33:24 PM
Attachments: [Turtlemound Townhome development.msg](#)
[FORMAL OPPOSITION TO PROPOSED REZONING AND FUTURE LAND USE MAP AMENDMENT Subject Property 1800 Turtle Mound Road Melbourne Florida Proposed Change Zoning RR-1 → RU-2-6 Future Land Use RES 4 → RES 6 ID# 26SS00002 and 26Z00008.msg](#)
[FORMAL OPPOSITION TO PROPOSED REZONING AND FUTURE LAND USE MAP AMENDMENT Subject Property 1800 Turtle Mound Road Melbourne Florida Proposed Change Zoning RR-1 → RU-2-6 Future Land Use RES 4 → RES 6 ID# 26SS00002 and 26Z00008.msg](#)
[image003.png](#)

Good Afternoon,

Please find the attached public comment emails and below phone calls the district 2 Commissioner's office has received for Defender Homes Airway Heights LLC – application numbers 26SS00002 and 26Z00008.

- On 6/4/2026, received phone call from George Alexander with opposition
- On 6/5/2026, received phone call from Gizelle Towers with opposition

Thank you and have a great day,



Susan Smith
Legislative Aide
Brevard County Commissioner Tom Goodson District 2
2575 North Courtenay Parkway Suite 200
Merritt Island, FL 32953
Ph: (321) 454-6601
E-mail: Susan.Smith@brevardfl.gov

From: Krista Soboh <knsoboh@gmail.com>

Sent: Monday, June 8, 2026 3:58 PM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Subject: Opposed to the propose rezoning by Defender Homes Airway Heights LLC, Case Case 26Z00008

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Defender Homes Airway Heights LLC — Case 26Z00008)

Dear County Commissioners,

I am writing to express my **opposition** to the proposed rezoning of the 14 acre property at the corner of Turtlemound Rd and White Road from rural residential to multi-family residential. I would like my opposition to be part of the official record. This proposed zoning changes would allow for condominiums, apartments and possibly low income housing.

I own a home in this neighborhood and my address is 1597 Sienna Dr. Melbourne, Florida where I live less than half a mile from the proposed changes. I have lived in this area for the last 20 years. Over this time there has been a growth in new single family construction that has increased the value of my property. Unfortunately, these proposed changes would allow for the possibility of low income housing next to million dollar homes in gated communities. This makes homeowners wishing to protect their most valuable assets very angry. The thought of bringing condominiums, apartments and possibly low income housing to the area would bring more traffic, crime and congestion to our quiet neighborhoods and would sadly diminish our communities property values.

They would cut trees, try to change the roads, build parking lots and bring more congestion. Honestly, we did not sign up to live next to an urban parking lot, we chose a pastoral setting. My neighbors and I love the peace in our neighborhood which is why we are fighting passionately to protect the county from changing the zoning. Some years ago, a developer attempted to change the zoning. We expressed our outraged then and won. **We are now fighting again against the proposed changes in land use and we will not give up.** We are invested in our community and we will never accept developers bringing changes, solely because they want to make a quick profit!

Sincerely,

Krista Soboh

1597 Sienna Dr.
Melbourne, FL 32935
321-210-2017

From: Ann Strahlo <annstrahlo@yahoo.com>

Sent: Tuesday, June 2, 2026 11:25 AM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Subject: Formal Objection: Case 26Z00008 (Defender Homes Airway Heights LLC)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board

Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)

My name is Ann Strahlo, and I reside at 4241 Careywood Drive, Melbourne, which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6, and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

Zoning Incompatibility: The surrounding area is established as a lower-density, rural residential community. Introducing multiple-family high-density housing destroys the established neighborhood character and sets a damaging zoning precedent.

Traffic and Safety: Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create safety hazards

Drainage and Wetland Preservation: This sector has known challenges with drainage, wetlands, and existing local crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks and damage sensitive local wetlands.

Please include this objection in the official case file and distribute it to all board members prior to the upcoming public hearing on June 15, 2026. I request that my opposition be noted in the official meeting minutes. Thank you for your time, service, and consideration of the community's safety and integrity.

Sincerely,
Ann Strahlo
321.223.4852

From: Jacob Strahlo <jacobstrahlo@yahoo.com>

Sent: Tuesday, June 2, 2026 8:09 PM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Subject: Formal Objection: Case 26Z00008 (Defender Homes Airway Heights LLC)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board,

My name is Jacob Strahlo, and I reside at 4241 Carewood Drive, which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6, and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

- Zoning Incompatibility: The surrounding area is established as a lower-density, rural residential community. Introducing multiple-family high-density housing destroys the established neighborhood character and sets a damaging zoning precedent.
- Traffic and Safety: Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create safety hazards.
- Drainage and Wetland Preservation: This sector has known challenges with drainage, wetlands, and existing local crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks and damage sensitive local wetlands.

Along with the impacts stated above, I was born and raised a few streets down from the proposed development site and have seen the slow degradation and over-development of our community in my lifetime alone. What very few green spaces we have left in Melbourne are of vital importance and should be preserved to their greatest potential. While development is inevitable, please consider "Keeping Brevard Beautiful", and preventing another apartment complex or similar structure to sit alongside neighborhoods that have existed for generations and played tremendous roles in the childhoods of many and community that has made Melbourne and specifically the Lake Washington area, to be so highly appreciated.

Please include this objection in the official case file and distribute it to all board members prior to the upcoming public hearing on June 15, 2026. I request that my opposition be noted in the official meeting minutes. Thank you for your time, service, and consideration of the community's safety and integrity.

Sincerely,
Jacob Strahlo
(321) 604-5873
jacobstrahlo@yahoo.com

From: Bill Strahlo <bill.strahlo@gmail.com>

Sent: Friday, June 5, 2026 5:53 PM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Subject: Formal Objection:Case 26Z00008 (Defender Holmes Airway Heights LLC

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board

Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)

My name is William Strahlo, and I reside at 4241 Careywood Drive, which is located near the proposed development site. I am writing to formally register my very strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6, and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

Zoning Incompatibility: The surrounding area is established as a lower-density, rural residential community. Introducing multiple-family high-density housing destroys the established neighborhood character and sets a damaging zoning precedent.

Traffic and Safety: Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create safety hazards.

Drainage and Wetland Preservation: This sector has known challenges with drainage, wetlands, and existing local crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks and damage sensitive local wetlands.

Please include this objection in the official case file and distribute it to all board members prior to the upcoming public hearing on June 15, 2026. I request that my opposition be noted in the official meeting minutes. Thank you for your time, service, and consideration of the community's safety and integrity.

Sincerely, William Strahlo, 321-536-4155, bill.strahlo@gmail.com.

From: Wendy Taylor <wendy622000@yahoo.com>
Sent: Friday, June 5, 2026 11:41 AM
To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>
Subject: Stop R-U-2-6 1800 Turtle mound Road

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

June 5, 2026

Commissioner Thad Altman
Brevard County Board of County Commissioners
2725 Judge Fran Jamieson Way
Viera, FL 32940

Re: Opposition to Proposed Zoning Change — Old Radio Station Property, Turtle mound Road

Dear Commissioner Altman,

I am writing as a resident of the Lake Washington area to formally oppose the proposed rezoning of the former radio station property on Turtle mound Road from single-family to multi-family residential. My primary concerns are:

- Drainage
- Traffic — Multi-family development would generate significantly more vehicle trips, placing additional strain on Turtle mound Road and the surrounding road network.
- Neighborhood Character — This is an established single-family community. Rezoning would fundamentally alter its character and set a troubling precedent for further changes throughout the area.

I respectfully request that the Board deny the proposed rezoning. I ask that this letter be entered into the public record for the relevant hearing.

Respectfully,

Wendy Taylor
3209 Fairview Drive
Melbourne FL 32934
Lake Washington Area Resident

From: Linda Thomas <miclin22@yahoo.com>

Sent: Tuesday, June 9, 2026 2:57 PM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Subject: Objection to case #26Z00008 zoning case Defender Homes

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Hello

We strongly want to object to Defender Homes zoning request case #26z00008 Defender homes wanting to change the zoning to multi family . Aurora road has a low income housing at the west end the far east end and one right at intersection of just east of wickham. We are trying to maintain our property values. The 4 way stop at Turtlemound and Aurora rd is very busy at morning and evening commutes

We have some very nice little sub divisions where we feel safe with neighbors that are respectable and care about their properties.

Defender homes airway heights LLC case # 26Z00008

Please consider the existing home owners in this matter Thank You Linda K Thomas Michael W Thomas

1687 Sienna Dr
Melbourne Fl 32934
321-298 -0020
321-298-0092

From: donna turner <donnat1947@gmail.com>

Sent: Tuesday, June 9, 2026 12:45 PM

To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>

Subject: Formal Objection: Case 26Z00008 & Case26S.02 Defender Homes Airway Heights LLC

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board,
Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)
My name is Donna Turner and I reside at 3450 Heartwood Ln, Melbourne, which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6 and from the Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6) based on the following critical impacts to our community:

1. Zoning incompatibility

The surrounding area is an established lower-density rural residential community. Introducing multiple-family high-density housing directly contradicts the established neighborhood character, destroys the rural fabric of this corridor, and sets a damaging zoning precedent that will invite future high-density development throughout the area.

2. Traffic and Safety

Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create significant safety hazards for existing residents. I formally request that a comprehensive traffic impact study be required and made fully available to the public prior to any approval being considered by this Board.

3. Drainage, Wetlands, and Flooding.

This sector has known and documented challenges with drainage, wetlands, and existing crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks for surrounding properties and damage sensitive local wetlands. Where applicable, Florida Department of Environmental Protection and United States Army Corps of Engineers jurisdiction over any wetlands on or adjacent to this property must be fully evaluated and disclosed before rezoning is considered.

4. Infrastructure and Utility Capacity

The existing water, sewer, and emergency services infrastructure in this area was not designed to accommodate the demands of a high-density multi family development. No approval should be granted without a full infrastructure capacity analysis confirming that existing systems can support this level of increased demand without negatively impacting current residents.

5. School Capacity

The addition of a high-density multi-family residential complex will place immediate and significant pressure on the enrollment capacity of local schools. The Board should require a school impact analysis prior to approval and coordinate with Brevard County Public Schools to assess whether existing facilities can absorb this growth.

6. Property Values

The proposed rezoning and resulting development will negatively impact the property values of surrounding residential homes. Residents have made long-term investments in this community based on its established rural residential character. Approving this rezoning undermines those investments and the reasonable expectations of the existing homeowners in this area.

I formally request the following:

That this objection be included in the official case file for Case 26Z00008 and Case 26S.02

That it be distributed to all Board members prior to the public hearing on June 15, 2026

That my opposition be noted in the official meeting minutes

That the Board require a full traffic impact study, infrastructure capacity analysis, school impact analysis, and wetlands evaluation before any vote is taken

That if the community has not had adequate time to organize and respond to this proposal, the Board grant a continuance to allow full public participation

Thank you for your time, service, and consideration of our community's safety, character, and integrity.

Sincerely,

Donna Turner

3450 Heartwood Lane, Melbourne 32934

321-223-3424

donnat1947@gmail.com

From: teresa weber <terrypharmaceuticalrep@yahoo.com>
Sent: Tuesday, June 2, 2026 11:33 AM
To: Gilliam, Trina <Trina.Gilliam@brevardfl.gov>
Subject: Formal objection: case 26Z00008(defender homes Airway Heights LLC)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Teresa and Gerard Weber

4075 Janewood Lane

Melbourne fl 32934

Subject: Formal Objection: Case 26Z00008

(Defender Homes Airway Heights LLC)

Dear Ms. Gilliam and Members of the Brevard County Planning and Zoning Board
Re: Formal Objection to Case 26Z00008 & Case 26S.02 (1800 Turtle Mound Road)

My name is Teresa Weber and I reside at 4075 Janewood Lane Melbourne 32934, which is located near the proposed development site. I am writing to formally register my strong objection to the comprehensive plan amendment and zoning classification change requested by Defender Homes Airway Heights LLC for the 14.37-acre property at the northwest corner of White Road and Turtle Mound Road. I urge the Board to deny the request to shift this property from RES 4 to RES 6, and from Rural Residential (RR-1) to Low-Density Multiple-Family (RU-2-6), based on the following critical impacts to our community:

Zoning Incompatibility: The surrounding area is established as a lower-density, rural residential community. Introducing multiple-family high-density housing destroys the established neighborhood character and sets a damaging zoning precedent.

Traffic and Safety: Turtle Mound Road and White Road are not structurally designed to support the heavy trip distributions generated by multi-family densities. This project will severely degrade local traffic flow and create safety hazards.

Drainage and Wetland Preservation: This sector has known challenges with drainage, wetlands, and existing local crown elevations. Increasing density and adding impervious surfaces will exacerbate flooding risks and damage sensitive local wetlands.

Please include this objection in the official case file and distribute it to all board members prior to the upcoming public hearing on June 15, 2026. I request that my opposition be noted in the official meeting minutes. Thank you for your time, service, and consideration of the community's safety and integrity.

Sincerely, Teresa and Gerard Weber, 321-795-4485, terrypharmaceuticalrep@yahoo.com

[Yahoo Mail: Search, Organize, Conquer](#)

From: [Hank](#)
To: [AdministrativeServices](#)
Subject: Fwd: Rezoning letter
Date: Monday, June 8, 2026 9:39:31 AM
Attachments: [26SS00002_26Z00008 - Objection to Rezoning by Fox Bay Resident.pdf](#)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

I am opposed to the request to change the zoning for 1800 Turtle Mound rd to RU-2-6 for the same reasons set forth in my neighbor, Scott Schiffer's letter dated June 5 2026. Thank you.

Henry J Wielgosz
1837 Fox Bay Drive
Melbourne FL 32934

Dear Commissioner [Altman / Adkinson /
Feltner / Goodson / Delaney],

I write on behalf of residents of the Fox Bay community to respectfully submit the attached letter in opposition to Case Nos. 26SS00002 (Small-Scale Future Land Use Map Amendment) and 26Z00008 (Rezoning Application) concerning the property at 1800 Turtle Mound Road, Melbourne, Florida.

Our concerns relate to the proposed changes' consistency with the Brevard County Comprehensive Plan, compatibility with the established character of the surrounding neighborhood, and the adequacy of the supporting analysis in the staff report. The attached letter sets forth our objections in detail.

We appreciate the Board's consideration of our comments and respectfully

request that both applications be denied.
We welcome the opportunity to address
the Board at the public hearing on this
matter.

Respectfully submitted, Henry J. Wielgosz

From: [Gianella, Janette](#) on behalf of [Commissioner, D5](#)
To: [AdministrativeServices](#)
Subject: FW: Rezoning
Date: Friday, June 5, 2026 1:20:41 PM

-----Original Message-----

From: Tessie Willems <tessiewillems101@aol.com>
Sent: Friday, June 5, 2026 1:01 PM
To: Commissioner, D5 <D5.Commissioner@brevardfl.gov>
Subject: Rezoning

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

We are against the rezoning of the 14.6 acres on turtle mound and aurora. There are gopher turtles located in the woods. The four way stop can't handle anymore traffic. Me and my children almost get in a car accident once a week due to the amount of traffic flow. We live on Carolwood and have enough through traffic. This would just cause more. No more houses/apartments/ condos etc need to be placed there. Thank you Sent from my iPhone