

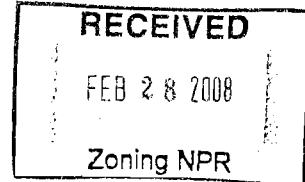
EPPERSON RANCH, LLC

2502 North Rocky Point Drive, Suite 1050, Tampa, FL 33607
Phone: 813-288-8078, Facsimile: 813-288-8178

Handwritten:
Mulligan
FYI
2-27-08

February 22, 2008

Ms. Corelynn Burns
Pasco County Growth Management Department
7530 Little Road, Suite 320
New Port Richey, FL 34654



Re: Promenade Town Center Master Plan

Dear Ms. Burns:

Our company recently purchased the Epperson Ranch property from Lennar Homes, Inc. that also includes the land area denoted as a part of the proposed Promenade Town Center Master Plan submitted to you from Heidt & Associates, Inc. on January 22, 2008. From an over-all perspective, we understand the importance for a unified master plan that is both applicable and consistent with the underlying land use and want to commend Crown Community Development for taking a lead role in this effort. However, as the new owner of the Epperson property and given our review of the plan as submitted, we do have objections to certain elements and representations.

As you may be aware, the Epperson property while under the previous ownership had received DRC approval as a DRI subject to final approval by the BOCC. At our request, the BOCC agenda was continued pending the resolution of numerous concerns contained in both the proposed Development Order (D.O.) and Development Agreement (D.A.). Several of these issues pertain to the Town Center and appear to conflict with the Master Plan regarding entitlements and infrastructure timing. Given the complexity of D.O. and D.A. issues of concern, it is very likely that the BOCC approval of this DRI may take several more months.

Regarding our specific objections to the Town Center Master Plan, they consist of the following points:

1. Exhibit A-2: We object to the roadway infrastructure construction commencement and completion dates as shown because there is no transportation analysis that supports them. From our standpoint, these improvements should be constructed based on (1), a transportation roadway capacity study and (2), real world market conditions and not artificial timing that appears to benefit one private party at the detriment of another private party. In our opinion, any information showing phased construction related dates, should be deleted.
2. Exhibit A-2 and Exhibit E-4: The D.A. requires us to construct and widen Curly Road to a 4-lane divided as currently being designed by the County. We object to both Exhibit A-2 and Exhibit E-4 as they indicate a significantly more extensive roadway design that is not included in the proportionate share calculations nor reflected in the currently approved design criteria of Curley Road.
3. Exhibit A-4: We object to the both the Entitlement and Actual entitlement counts as shown for the Epperson property as they do not reflect the entitlement counts stated in both the D.O. and the D.A. as 50,000 square feet of office, 209,000 square feet of commercial, 100 motel rooms, 200 multifamily du's, and 256 single-family attached du's. Exhibit A-4 should be revised to reflect the D.O. and D.A. entitlements counts for both categories.
4. Exhibit B-1: In the Legend, "(When Warranted)" should be replaced by "(If Warranted)".

5. Exhibit E-1: According to the legend, structured parking is shown to be only within our property and not the others. If by structured one means an elevated parking garage, then we strongly object to this potential obligation being shown within our property as it would put us at a competitive disadvantage in marketing the commercial and office parcels to future clients against Centex and Crown as they appear to have no structured parking requirements. Also, several parking areas with the Epperson portion are denoted as structured when they clearly are surface parking.

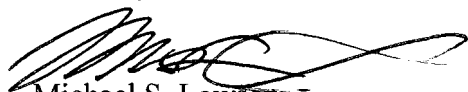
In addition to our items of objection denoted above, I would like to take this opportunity to discuss my perspective concerning Town Center planning. Having been in the residential development industry for nearly twenty-five years, I have had numerous occasions to utilize TND related elements in various communities. The difficulty many in my industry have faced with government mandated TND's is, if they are developed in their purest form, very few have been economically successful and end up being highly exclusive from both a home and commercial/retail pricing standpoint.

I would also like to emphasize that the BOCC needs to understand that a TND/Town Center master plan such as Promenade Town Center needs to serve two purposes. The first is to establish an elemental framework regarding the consistency of aesthetics, architectural harmony and symmetry. The second is to be fluid and flexible so that changes to the plan can be implemented as market conditions and social economic changes occur in the future.

I hope you will find my perspective helpful during your review of the master plan and would also appreciate that our objections as previously defined be implemented in a prompt manner.

Please feel free to contact me at your earliest convenience if you have any questions regarding this letter. I will also be very happy to meet with you and your staff if you believe that would be appropriate.

Sincerely,



Michael S. Lawson

Director of Land Development

cc: Samuel P. Steffey, II, Pasco County Growth Management Division
James Widman, P.E., Pasco County Engineering Services Division
Debra M. Zampetti, Pasco County Zoning/Code Compliance Division
Craig B. Weber, CKB Development, LLC
Wilhelm A. Nunn, Centex Homes – West Florida Division
Keith Bricklemyer, Bricklemyer Smolker & Bolves, P.A.
B. Patrick Gassaway, P.E., Heidt & Associates, Inc.
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