



Envision Alachua Sector Plan/ Comprehensive Plan Amendment Application CPA-01-14 Staff Report

An analysis and recommendation on the request by Plum Creek Land Company for a Comprehensive Plan amendment to create the Envision Alachua Sector Plan

**County Commission Public Hearing
February 16, 2016**

This Staff Report and its Appendices, the application and other supporting documents are available on the web at:

<http://growth-management.alachuacounty.us/planning/plum-creek/>

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I. Executive Summary

The applicant, Plum Creek Land Company, has submitted a large-scale comprehensive plan amendment for approximately 52,745 acres in unincorporated Alachua County to create the Envision Alachua Sector Plan (EASP). The stated purpose of the amendment is a “request to amend the text and maps of the Alachua County Comprehensive Plan in order to provide significant conservation lands and agricultural lands in perpetuity, and provide opportunities for additional employment-oriented mixed use in eastern Alachua County on approximately 52,745 acres owned by Plum Creek.” (Page 1 of application, section titled “Description of Request”)(see Appendix 1 for Proposed Policies and Maps). The amendment proposes new **EASP Objective 10.1**, which states “Provide a land use and development framework for the Envision Alachua Sector Plan through the creation of a Long Term Master Plan (LTMP) with a 50-year planning horizon that serves the public interest of the citizens of Alachua County by guiding conservation and development practices in a manner that ensures adequate protection of resources while strengthening the economic viability of the eastern portion of Alachua County.” For the 52,745 acres, this amendment proposes to change the designation on the County’s adopted Future Land Use Map 2030 from the Rural/Agriculture and Preservation future land use designations to several proposed new future land use categories. The application also proposes new policies to govern the land within the Envision Alachua Sector Plan boundaries. The overall mix of uses for the Envision Alachua Sector Plan is proposed to include a maximum of 8,700 residential units, 11.2 million square feet of non-residential development (to include Research and Development, Office, Advanced Manufacturing and Commercial), Conservation land uses, Agriculture land uses, including continued silviculture, and Preservation lands (Land uses are described in more detail in Section III *Land Use Analysis* of the staff report).

In November 2015, the City of Hawthorne annexed 1,200 acres of Plum Creek Land Company property into the City and amended their comprehensive plan to allow 800 dwelling units and 3,000,000 square feet of non-residential development on the annexed property and on an additional 162 acres already located within the Hawthorne City limits.

A. Land Use

A major tenet of the Comprehensive Plan is an Urban Cluster line accompanied by strong planning provisions that ensure that development does not sprawl into the rural area, consuming land with agricultural, ecological, and historical significance. This application proposes to allow intense urban development, as outlined above, in a rural area of the County with farms, rural residences, many natural resources and four of the County’s historic Rural Clusters including Windsor, Campville, Grove Park and Rochelle. A development of this size and type would make it difficult to protect the rural character of those properties not within the Sector Plan boundaries.

The application and accompanying backup material do not support the density and intensity of land use that would be allowed by the proposed policies in the rural area that is the subject of this application. These urban land uses are not compatible with the surrounding rural area and lifestyle. The Envision Alachua Sector Plan application is proposing urban uses in an area that is primarily designated Rural/Agriculture on the Future Land Use Map 2030 (Map 3: Existing Land Use with Employment Oriented Mixed Use Overlay). This rural area of the County has no urban development and lacks existing or previously planned urban infrastructure, public facilities and services. This area of the County is also populated by farms and large lot rural residences served by private well and septic systems.

The first policy issue posed by the proposed Plum Creek Sector Plan is whether to allow urban development at this level of intensity and density outside of the Urban Cluster boundary inconsistent with the adopted policies in the Comprehensive Plan.

B. Natural Resources

A second major tenet of the Comprehensive Plan is strong protection of the natural environment while providing for economic development in the appropriate areas. The land uses in the Comprehensive Plan have been determined based on an analysis of balancing economic development, residential, recreation, and protection of agriculture, natural and historic resources. The Comprehensive Plan prohibits avoidable impacts to wetlands and development within the floodplains. The Plum Creek Sector Plan proposes policies that allow destruction of wetlands and important habitat and requires development in the floodplains, which leads to the conclusion that this is not the appropriate place for this type of development. (Map 12. Florida Ecological Greenways Network within the EASP Area). The effect of the proposed policies and resulting development on natural resources is summarized below and detailed in Section IV *Environmental Analysis* of this report).

The proposed amendment does not provide for the adequate protection of natural resources in an area of the County that has extensive and significant conservation resources protected under the County's adopted Comprehensive Plan. As stated, the County currently prohibits avoidable impacts to wetlands and floodplains. Furthermore, the proposed EASP policies would remove the County Commission's authority to determine if wetland impacts are appropriate and, if determined to be appropriate, to limit the extent of impacts. The County's wetland protection policies and implementing regulations serve a critical role in providing safeguards to maintain our community quality of life, protect water quality, quantity and aquifer recharge, manage stormwater and flooding, conserve habitat, and maintain resilience to future effects of global climate change (*i.e.*, extreme droughts and flooding) in our community. If implemented, proposed EASP policies would remove these safeguards by yielding local land use decision making authority to State and Federal environmental permitting agencies and allow 400 acres of wetlands to be filled by right without County review (proposed **EASP Policy 10.4.2.1**).

In addition, the soils in the proposed development area are not suitable for urban development. The most common soil in the SR 20 Job Center, which is the area proposed for the most intense uses, is Pomona sand (Map Unit #14 – USDA NRCS, 1985). This soil type is described as having *“severe limitations for urban uses, including absorption fields for septic tanks, dwellings, commercial buildings...roads and streets.”* The Soil Survey of Alachua County Florida also states that wetness is the major problem, with the water table often being within 10 inches of the surface for one to three months during the wet season.

The application lists a set of criteria for selecting proposed Conservation lands that includes: contribution to regional landscape linkages within Northern Florida; protection of large forested wetland systems to protect core habitat; contiguity with existing conservation lands; opportunity to “build upon” Alachua County’s Emerald Necklace; contribution to natural resources, watershed, and preserves such as Phifer Flatwoods; and enhancement of Lochloosa Creek’s connected wetland system to promote linkages for wildlife habitat (proposed **EASP Objective 10.0.1**). The proposed future land use map for the EASP does not appear to follow these criteria. More specifically, following the criteria listed above should have resulted in more aggressive conservation land allocation in the areas around Lochloosa Creek and east of Newnan’s Lake (Map 13: Location of EA-PRES land use and wildlife corridor).

Other issues are discussed in more detail in the environmental analysis (Section IV), including that the proposed amendments would create a significant demand for water and would allow intense development within the Orange Creek Basin Management Action Plan area and impaired watersheds of Newnan’s, Lochloosa and Orange Lakes. The amendments would also allow extensive urban development in a Strategic Ecosystem. Strategic Ecosystems are areas of the County given enhanced protection due to the presence of unique or abundant natural resources contributing to biodiversity, containing listed plant and animal species and presently maintaining ecological connectivity and integrity.

In the County’s current comprehensive planning process, natural resources are identified for protection prior to the design of the land development footprint of a proposed project. The beneficial outcome of the County’s land use planning framework is that the land development footprint avoids and minimizes damage to natural resources. In contrast, the proposal appears to put the land development footprint first with less regard to the protection of natural resources.

The second policy issue to consider is whether to allow intense urban development in an area that requires destruction of wetlands and protected habitat and development within floodplains inconsistent with the adopted policies in the Comprehensive Plan.

C. Public Facilities

A third major tenet of the Comprehensive Plan is controlled, fiscally sound growth. As detailed in Section V *Transportation Analysis* and Section VI *Public Facilities and Services Analysis*, this development would create a need for all public facilities and services, including major water and wastewater systems in an area of the County where urban facilities were not otherwise needed or planned. Though the applicant's analysis determines a need for water and sewer facilities, fire, schools, and roads, the proposed policies only consider a small portion of this need (proposed **EASP Capital Improvements Element (CIE) Table 5, EASP General Infrastructure Facilities Schedule of Capital Improvements**). The policies also state that the developer will pay for onsite public infrastructure and services and their portion of offsite infrastructure and services (proposed **EASP Policy 10.5.8 Infrastructure Financing**). But for this development, none of this would be needed in the foreseeable future. Provision of adequate facilities and services would be a substantial burden on the County's budget and would be premature at best.

This rural area lacks urban infrastructure and the proximity to existing urban infrastructure that would make provision of urban public facilities and services viable and efficient. A key issue for local governments in planning for urban growth in an area is the identification and establishment of a capital improvement program identifying projects and policies needed to serve the public. These facilities include those needed for services such as potable water supply, wastewater treatment, transportation and public schools. While this application makes provision for some capital improvement planning and analyzes the impact of the project in the data and analysis provided, the proposed Capital Improvement policies do not include the bulk of the potential impact and infrastructure that would be needed for the entire project but put this off until each Detailed Specific Area Plan, essentially the zoning stage.

Transportation. The coordination of natural resources, land use and transportation planning is a hallmark of the adopted Alachua County Comprehensive Plan. The applicant has provided a transportation study of the potential transportation impacts of the Envision Alachua Sector Plan (EASP) utilizing the existing Gainesville Metropolitan Area Countywide Transportation Model. The applicant's transportation study demonstrates that many area roadways will not meet their adopted levels of service if the development is constructed without adding additional infrastructure (Table 5. Roadways with Failing Level of Service due to Project Trips and Map 18. Potentially Failing Existing Roadway Segments at Buildout of EASP). The applicant does propose to add some infrastructure but the primary proposal for new transportation capacity is to widen SR 20 to six lanes which is not consistent with Comprehensive Plan policies that prohibit further six-laning of arterial roadways. The applicant's proposed Comprehensive Plan policy response to mobility issues is counter to the larger mobility goals of the Comprehensive Plan aimed at creating walkable mixed use areas within the existing urbanized framework of Alachua County.

The EASP proposes an areawide level of service for automobiles within the Envision Alachua-Employment Oriented Mixed Use (EA-EOMU) Land Use Category. Areawide level of service is unsuitable in the case of the EASP due to relatively remote location of the EA-EOMU land use and the challenges of constructing a gridded multimodal transportation system on property with significant areas of wetlands, floodplains and other sensitive ecological features. The policy response in the EASP application is not appropriate to address the projected level of service deficiencies identified by the applicant.

The addition of capital improvements to the transportation system proposed in the EASP amendment would either be insufficient to mitigate the impacts of the proposed development or would not be consistent with goals for a gridded transportation network. Adoption of the proposed amendment would undermine the mobility goals of infill and redevelopment of existing municipalities and the Urban Cluster as expressed within the structure of the Comprehensive Plan.

Fire. The applicant's analysis found a need for additional facilities and upgrades of Fire/EMS facilities. The analysis assumes no need for the first five years and therefore the applicant has not proposed any capital improvements for Fire facilities (proposed **EASP CIE Table 5 General Infrastructure Facilities Schedule of Capital Improvements**). There are no proposed policies that would phase construction in such a manner as to guarantee no need for Fire facilities through 2020. In addition, the full project needs to be planned for in the Comprehensive Plan. At buildout, the development is anticipated to generate approximately \$2.15 million in total fire impact fees. Based upon information included in the Fire/EMS Facility Analysis, the total capital cost to support the development would be \$11.3 million. This leaves a gap of nearly \$8.85 million dollars.

Schools. As analyzed in detail in Section VI.B.2. *Public Schools Coordination and Capacity* of this report, the application includes an analysis of public school capacity and needs associated with the residential development proposed in the application that identifies a projected need at buildout of three new elementary schools, one middle school, and one high school. However, the analysis uses adjacent school concurrency areas, and, for purposes of long-range planning, only the adopted school concurrency service area where residential development in the EASP would be located should be used. There are no policies proposed to provide for a Capacity Enhancement Agreement with the School Board as suggested by the Interlocal Agreement between the County and the School Board and the Public School Facilities Element of the County's Comprehensive Plan.

Water and Sewer. The applicant has analyzed the needs for new water and wastewater treatment facilities for the buildout of the development, though these needs have not been translated correctly into policy. The proposed Capital Improvements Program (CIP) table includes water supply and wastewater facilities needed through 2020. As found in the

applicant's analysis, this is based on an assumption that no development will take place prior to 2020. There are no policies proposed to support this assumption.

The applicant has analyzed necessary infrastructure and costs for the build out of the project but then based the proposed policies on an assumed number of residences constructed per year without including policies that would prescribe phasing of the development in this manner. Through 2030, 2,200 residential units are assumed in many of the infrastructure analyses. Only the transportation capital improvements amendments include facilities through buildout of the EASP. The proposed CIE amendments include necessary infrastructure for water and sewer through 2020. Fire/EMS, schools, and stormwater and solid waste, though analyzed by the applicant, have no proposed capital improvement policies associated with them.

Public facility and service planning is an important component of comprehensive planning. The application proposes policies that would allow 8,700 residential units and 11.2 million square feet of non-residential but does not propose policies that would account for full capital improvement provision for the impact of the development. These CIE amendments should include the full extent of facilities needed, including proposed funding sources, as part of the Long Term Master Plan comprehensive plan amendment process as the plan for infrastructure provision is an important component of consideration of the overall proposed Envision Alachua Plan. Infrastructure and service provision is one of the largest expenditures of Alachua County government and must be available for adequate consideration of a project of this size and impact. Though the applicant has analyzed the potential impacts on public facilities and infrastructure from buildout of this development, those analyses have not been appropriately translated into policy that staff can recommend supporting to the County Commission.

The third policy issue is whether or not to allow premature development of urban infrastructure and provision of services in an area of the County that is rural and environmentally sensitive when there are other more suitable locations for this type of development that already provide some level of infrastructure and services that could be expanded much more efficiently, more cost effectively and using fewer resources.

D. Conclusion

The applicant has provided extensive data and analysis for various aspects of this project including land use, natural resources, and public infrastructure. The Plum Creek application proposes intense mixed-use development on 5,555 acres in a rural area of the County on property that contains extensive wetlands, floodplains, and other protected natural resources. The development as proposed would violate the major tenets of the adopted Comprehensive Plan. This County's Comprehensive Plan was created through an extensive community visioning process. Controlled, fiscally sound growth and protection of our most valuable resources are major issues of importance to the County's citizens and these issues inform the majority of the

policies in the Plan. The Plum Creek proposal contains policies that would reduce protections and allow intense growth that is incompatible with this rural area of the County. If the County Commission were to determine that the Plum Creek Sector Plan should be approved despite the policy issues stated above, then there are major issues with the proposed language that would need to be fixed. Among those issues is that the proposed Comprehensive Plan language provides a very basic, general idea of how the development would ensue. There is no real phasing or timing proposed and there are no proposed policies to determine how each DSAP would connect and interact with the next DSAP or how the two distinct job centers (SR 20 and US 301) would interact with each other.

Staff has analyzed the Envision Alachua Sector Plan application including the supporting data and analysis and, based on the results of that analysis, is making a recommendation to the County Commission that it deny the proposed amendment.

II. Overview of Proposed EASP Comprehensive Plan Amendment and Sector Plan Requirements

A. Sector Plans

A sector plan, as described in Section 163.3245, Florida Statutes, is a long-range plan for properties of at least 15,000 acres that is intended to promote planning for conservation, development, and agriculture. Sector Plans, which are exempt from the Development of Regional Impact requirements under Section 380.06, F.S., are created through a two-step process. The first, the proposed Long-Term Master Plan (LTMP), is required to be reviewed as a Comprehensive Plan amendment. The second step, two or more Detailed Specific Area Plans (DSAP) to implement the Long Term Master Plan, are adopted as local government development orders and give greater detail to the policies in the Long Term Master Plan. A DSAP is essentially the detailed zoning requirements after the Long-Term Master Plan is adopted. Therefore, Alachua County has adopted regulations requiring DSAPs to be processed in the same way as Planned Development.

The Long-Term Master Plan comprehensive plan amendment is the subject of this application. Section 163.3245(3) (a), F.S. states that “In addition to the other requirements of this chapter, except for those that are inconsistent with or superseded by the planning standards of this paragraph, a long-term master plan pursuant to this section must include maps, illustrations and text supported by data and analysis to address the following:” (summarized below)

- Framework Map depicting at a minimum urban, agriculture, rural and conservation land uses
- Allowed uses in various parts of the planning area
- Maximum and minimum densities and intensities of use
- General development pattern in developed areas with graphic illustrations based on a hierarchy of places and functional place-making components
- General identification of:
 - Water supplies needed and available resources of water, including
 - water resource development, water supply development projects, water conservation measures needed to meet projected demand
 - Transportation facilities to serve the development, including guidelines to be used to establish each modal component intended to optimize mobility
 - Other regionally significant public facilities necessary to support the future land uses , which may include central utilities provided onsite within the planning area, and policies setting forth the procedures to mitigate project impacts on public facilities

- Regionally significant natural resources within the planning area based on the best available data and policies setting forth the procedures for protection or conservation of specific resources consistent with the overall conservation and development strategy for the planning area
- General principles and guidelines addressing:
 - Urban form, and the Interrelationships of future land uses
 - The protection, and as appropriate, restoration and management of lands identified for permanent preservation through recordation of conservation easements consistent with s. 704.06, which shall be phased or staged in coordination with detailed specific area plans to reflect phased or staged development within the planning area
 - Achieving a more clean, healthy environment,
 - Limiting urban sprawl
 - Providing a range of housing types
 - Protecting wildlife and natural areas
 - Advancing the efficient use of land and other resources
 - Creating quality communities of a design that promotes travel by multiple transportation modes
 - Enhancing the prospects for the creation of jobs
 - Facilitating intergovernmental coordination to address extrajurisdictional impacts from the future land uses

A long-term master plan comprehensive plan amendment, adopted pursuant to Section 163.3245, F.S., may be based upon a planning period longer than the generally applicable planning period of the local comprehensive plan, shall specify the projected population within the planning area during the chosen planning period, may include a phasing or staging schedule that allocates a portion of the local government's future growth to the planning area and are not required to demonstrate need based upon projected population growth or on any other basis.

The first part of Section 163.3245(3) (a), F.S., which states “**In addition to the other requirements of this chapter**, except for those that are inconsistent with or superseded by the planning standards of this paragraph, a long-term master plan pursuant to this section must include maps, illustrations and text supported by data and analysis to address the following...” (emphasis added) is referring to the requirements for comprehensive plan amendments found in Chapter 163.3177, F.S., and Chapter 163, Part II, F.S., generally. The detailed analysis of these requirements can be found later in the staff report in Section VII *Statutory Requirements for Comprehensive Plans and Plan Amendments and Sector Plans*.

State statutes allow for a jurisdiction to request that the Regional Planning Council hold a scoping meeting with the affected local government, surrounding jurisdictions that may be

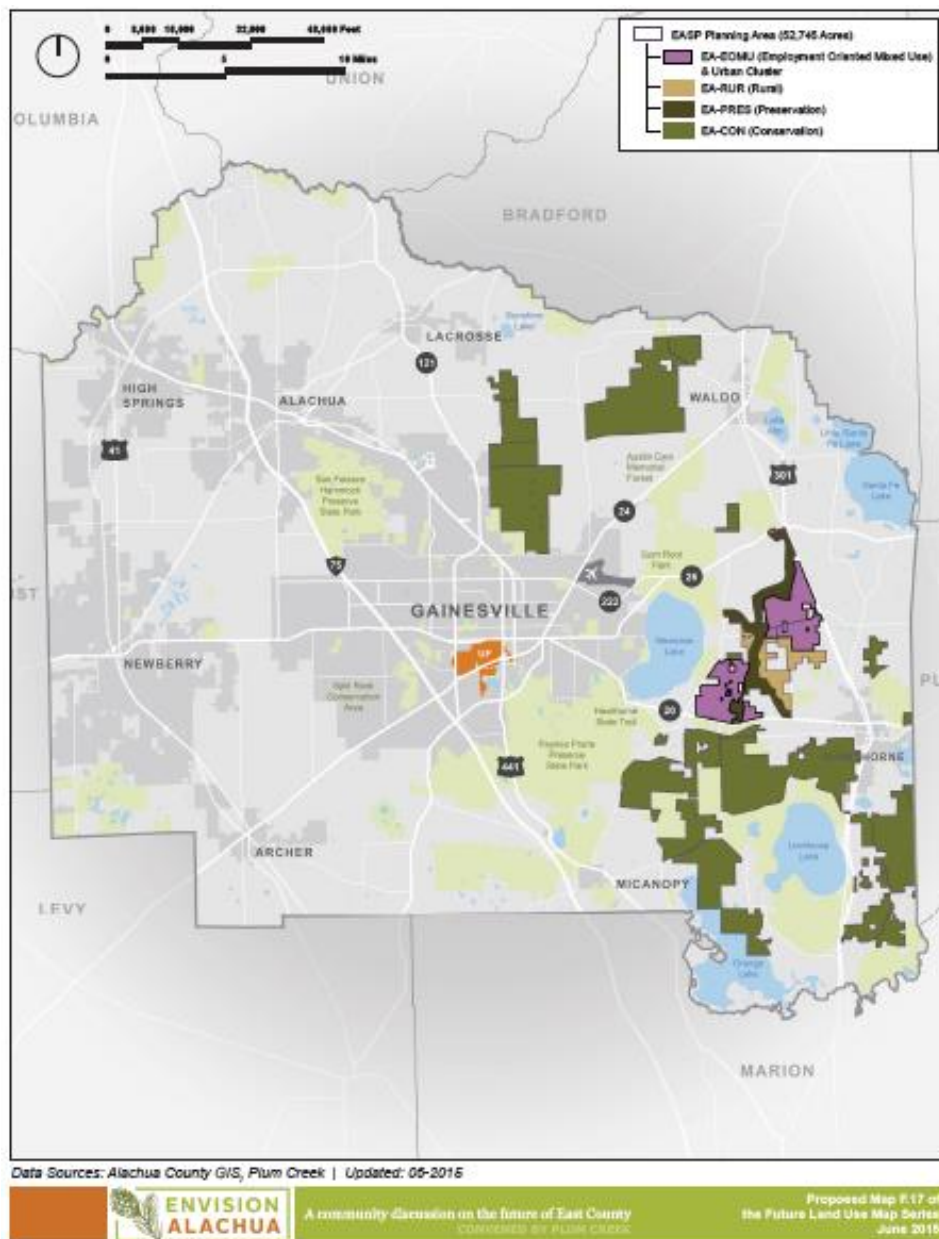
impacted, the Department of Economic Opportunity, the applicable Water Management Districts (St. Johns River and Suwannee River Water Management Districts in this case), the Department of Environmental Protection, the Department of State, the Department of Transportation, the Fish and Wildlife Conservation Commission and the Department of Agriculture and Consumer Services. Alachua County has adopted Sector Plan regulations into the Alachua County Unified Land Development Code in Chapter 402, Article 20 that require a scoping meeting for Sector Plan applications. This meeting was held on September 23, 2013. As a follow-up, the North Central Florida Regional Planning Council summarized the discussion at the scoping meeting and submitted this summary to the County and the Department of Economic Opportunity detailing their recommendations and comments from other agencies on issues that should be considered as part of this application (Appendix 2).

B. Proposed Land Use Categories

The proposed future land use categories for the amendment under consideration by the County are described below with locations shown on Map 1:

- **EA-EOMU (Envision Alachua Employment Oriented Mixed Use).**
 - Approximately 5,555 acres
 - The majority of the potential 8,700 residential uses and all of the 11.2 million square feet of non-residential would be within the proposed EA-EOMU designated property.
 - Proposed uses are found in proposed **EASP Policy 10.2.6.**, which states “...the full range of employment based uses including wholesale, warehousing, storage and distribution, research and development, and industrial/manufacturing uses; the full range of residential uses; supporting commercial uses (office, retail, hotel, and service uses); neighborhood-scale commercial uses; university campuses, public and private educational facilities, civic and public uses; recreation uses; agriculture uses and silvicultural uses; excavation and fill operations; and conservation uses. The range of allowable uses shall be broadly interpreted so as to allow those types of uses compatible with uses listed herein and consistent with the overall intent of the applicable policies.”
- **EA-CON (Envision Alachua Conservation)**
 - Approximately 41,691 acres total
 - 22,865 acres already under conservation easements with a Preservation land use designation to be designated EA-CON
 - 18,826 acres proposed to be designated EA-CON that are currently Rural/Agriculture

- Proposed uses are found in proposed **EASP Policy 10.2.4**, which states that permitted uses would be silviculture, public and private conservation, recreation and open space use, public and private wildlife preserves, hunting areas, game management and refuge areas, mitigation areas, water conservation and retention/detention areas, and low intensity agriculture uses.
- **EA-RUR(Envision Alachua Rural/Agricultural)**
 - Approximately 1,961 acres
 - Proposed uses are found in proposed **EASP Policy 10.2.5** which states that proposed uses would be consistent with the County’s policies for the Rural/Agriculture land use category including one unit per five acres density. This land use would also allow agricultural associated research facilities, public or private utilities including well fields, water and wastewater treatment facilities and other infrastructure including police and fire substations and would allow water conservation and water retention/detention areas for stormwater management.
- **EA-Pres (Envision Alachua Preservation)**
 - Approximately 3,538 acres
 - Proposed uses are found in proposed **EASP Policy 10.2.3**. This land use is intended for natural reserves or managed conservation lands and will be subject to a conservation easement. Four new road crossings will be allowed and impacts to wetlands for these crossings will be subject to state and federal wetland regulations, not County regulations. Development within the 100-year floodplain is allowed for these road crossings as well.



MAP 1: ENVISION ALACHUA SECTOR PLAN PROPOSED FUTURE LAND USE MAP

III.Land Use Analysis

A. Summary of Land Use Analysis

The adopted Alachua County Comprehensive Plan promotes new urban residential, commercial, industrial, and mixed use development within the Urban Cluster, where the necessary public services and infrastructure to serve urban development are readily available, or can be expanded in a cost-efficient and fiscally responsible manner. The Envision Alachua Sector Plan application is proposing urban uses in an area that is primarily designated Rural/Agriculture on the Future Land Use Map 2030. The proposed policies consider an additional two urban clusters in a rural area of the County that has no urban development and lacks existing or previously planned urban infrastructure, public facilities and services. There are extensive wetlands, poorly drained soils and 100-year floodplains throughout the area. In addition, the entire area is designated Strategic Ecosystem in the Comprehensive Plan. The proposed uses, intensities and densities of development for each of the two sub-areas in the Envision Alachua Employment Oriented Mixed Use area are urban uses that would require urban infrastructure and service levels. Given the environmental sensitivity of the area and the lack of urban infrastructure and services, this area is not appropriate for the scale of urban development that is proposed.

The area of the County proposed for development is also rural in nature with rural residences and farms on well and septic. The Rural Clusters of Windsor, Campville, Grove Park and Rochelle are adjacent or proximate to the Envision Alachua Employment Oriented Mixed Use area. Maintaining and preserving the character of these historic settlements and of this area of the County would be very difficult with the type of development proposed in the Envision Alachua Sector Plan.

The applicant has proposed amendments to a principle and strategy that contemplate new urban clusters. Two separate areas are marked as Urban Cluster on the proposed Future Land Use Map, the SR 20 Job Center and US 301 Job Center. The Urban Cluster designated on the current Future Land Use Map was so designated to encompass development and provision of public facilities and services through 2030 and beyond. It is unclear how the policies in the proposed Envision Alachua Sector Plan amendment would be consistent with the policies regulating the County's existing Urban Cluster. The two designations are not similar and the "proposed urban clusters" disregard the factors that went into designating the existing Urban Cluster and disregard the general principles, strategies and policies of the Comprehensive Plan. This application proposes intense residential, commercial and industrial uses well outside of the Urban Cluster in an environmentally sensitive area that lacks urban infrastructure and services. This is not a fiscally sound approach to development planning. The proposed Envision Alachua Sector Plan amendment would not meet the County's vision for efficient development that conserves natural resources while providing economic opportunity and growth potential.

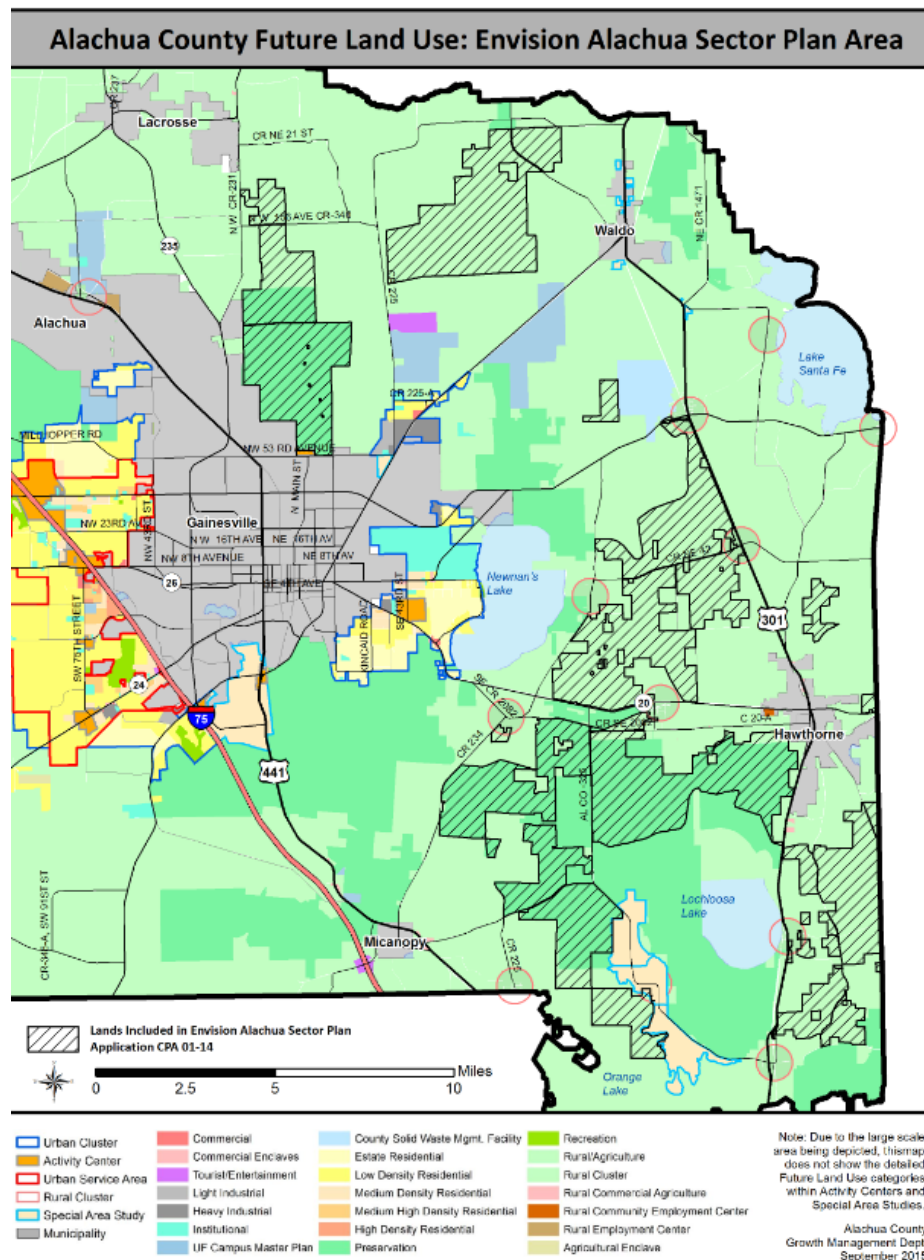
B. Analysis of Issues

1. Existing Land Use/Suitability of Area for the Proposed Uses

a. Existing Land Use

The majority of the property within the proposed Envision Alachua Sector Plan (EASP), located primarily in eastern Alachua County, is currently designated Rural/Agriculture on the Future Land Use Map 2030 (Map 2). Approximately 22,865 acres have an existing conservation easement and some of this property has a Preservation future land use designation. A small percentage of acres is located in the Rural Clusters of Windsor, Campville, Grove Park and Cross Creek.

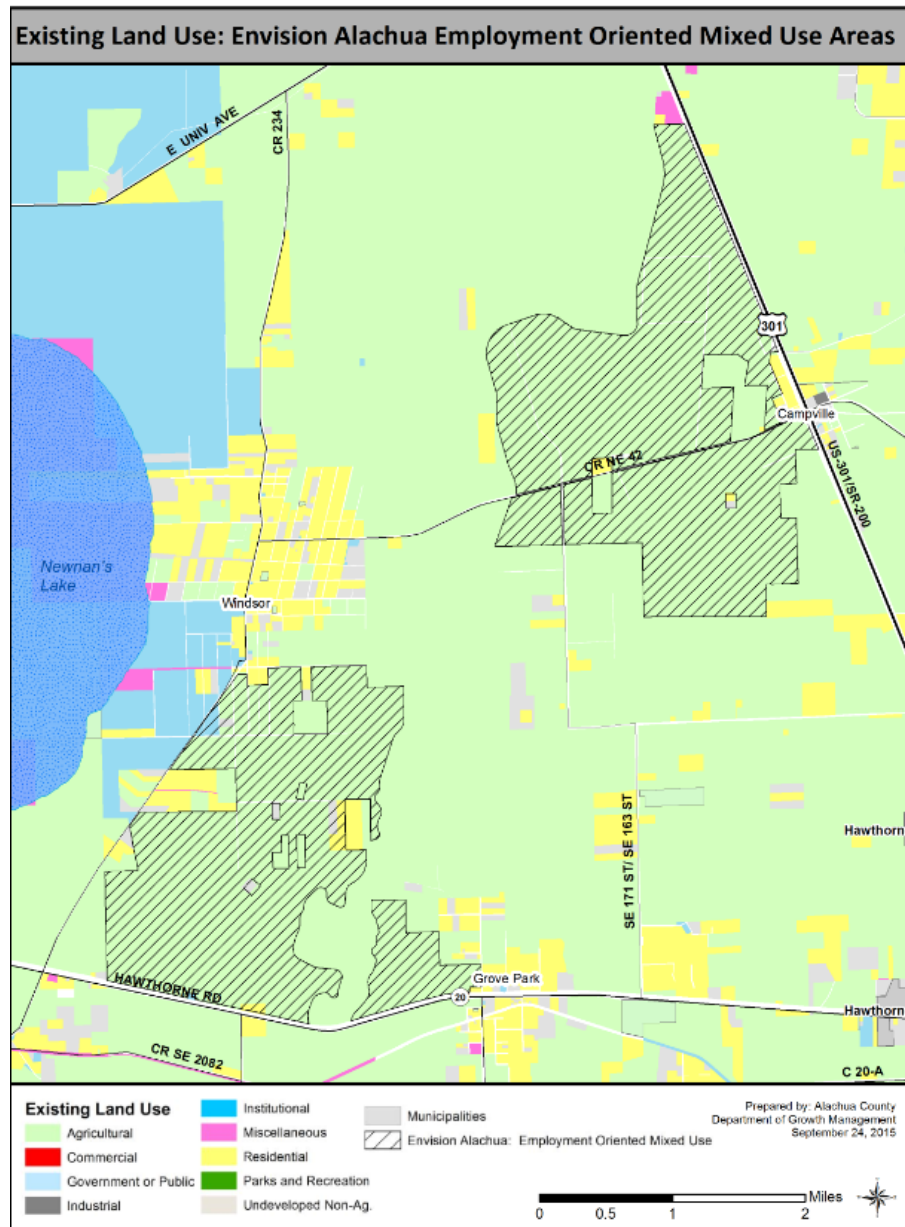
The application proposes a comprehensive plan amendment that contains four new land use designations as described earlier in the report in Section II B *Proposed Land Use Designations* (EA-EOMU, EA-CON, EA-RUR, EA-PRES), amendments to a principle and general strategy, a new general strategy, nine new objectives and approximately 91 new policies that would only apply to the land within the EASP boundaries. Excerpts of the proposed new strategies, objectives and policies are included in the staff review below. The full text of the proposed policies can be found in Section 3 of the application materials and in Appendix 1 of this report.



MAP 2: FUTURE LAND USE MAP WITH EASP OVERLAY

The four new proposed land use categories would apply only within the boundaries of the EASP. The area of the County where Plum Creek has proposed the EA-EOMU (Envision Alachua Employment Oriented Mixed Use) land use designation is primarily designated Rural/Agriculture on the Future Land Use Map 2030. Residential uses in the Rural/Agriculture land use areas are limited to a density of up to one dwelling unit per five acres. There are two Rural Clusters that are partly within the area proposed for mixed use, (EA-EOMU area): Campville and Grove Park and on directly adjacent to the boundary of the EA-EOMU (Windsor). These Rural Clusters have densities of up to one unit per acre within a small geographic boundary. These clusters are so designated to recognize and preserve historic rural settlements. The existing land uses within the EA-EOMU area bounded by US 301, State Road 20, County Road 234 and Lochloosa Creek are agriculture and scattered rural residential

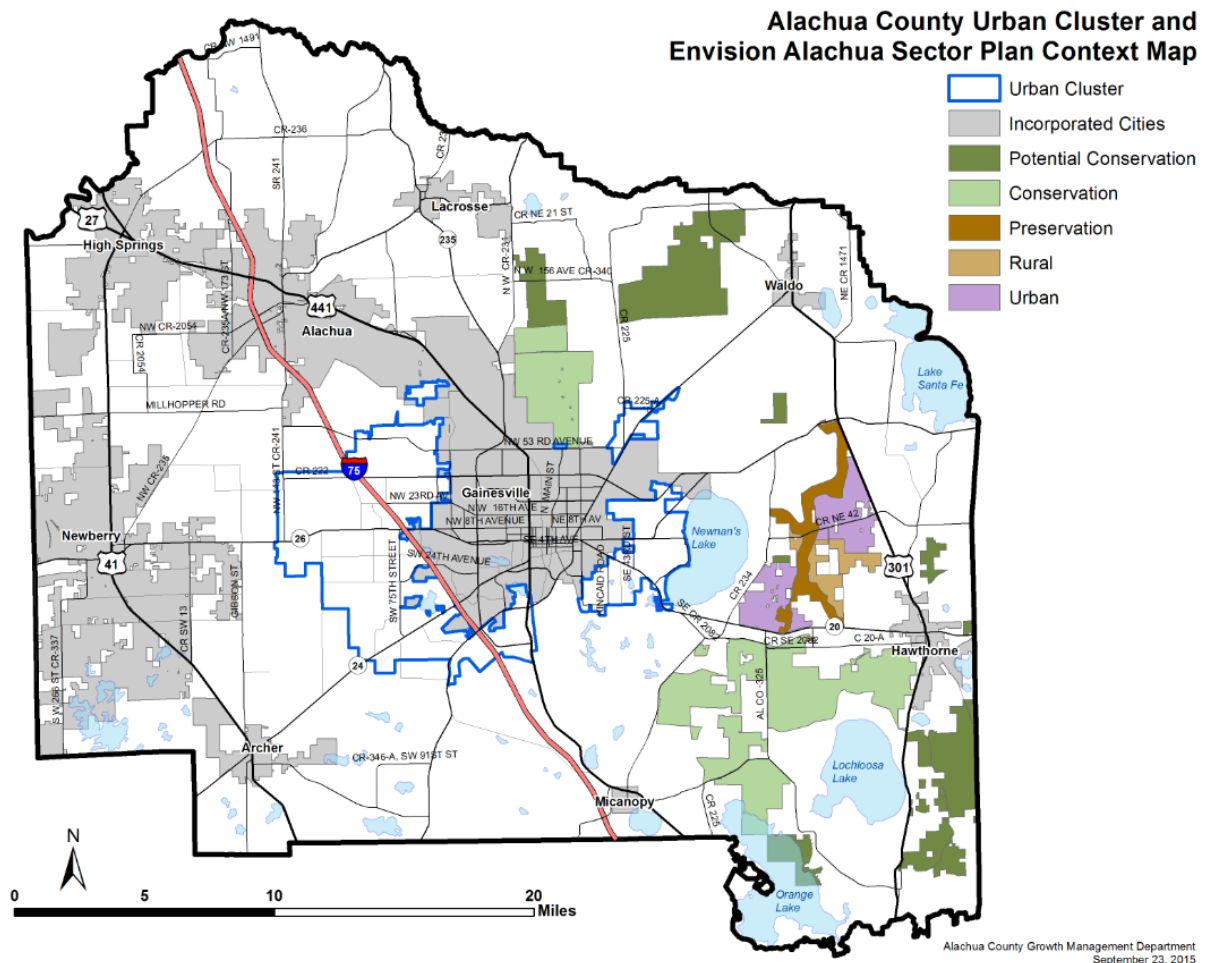
development (Map 3). The EASP contains significant areas of wetlands, floodplains, and poorly drained soils. Based on the information submitted by the applicant and County staff's evaluation, most of the land consists of an extensive mosaic of planted pine (approx. 63%) and wetlands (approx. 33%). Approximately 58% of the property is located within 100-year floodplains. All of the EA-EOMU area is identified and mapped in the Comprehensive Plan as Strategic Ecosystems because of its unique environmental quality and features. The environmental suitability of the property for the types of uses proposed is discussed in more detail in Section IV *Natural Resources Analysis* of this report.



MAP 3: EXISTING LAND USE WITH EMPLOYMENT ORIENTED MIXED USE OVERLAY

b. Urban Cluster

One of the fundamental land use strategies of the Alachua County Comprehensive Plan is to direct future urban development to locate within an urban growth area known as the Urban Cluster to maximize efficient use of land, separate urban and rural areas, and protect agricultural areas and natural resources. Defining a growth boundary is a central principle in land use planning in general. The Urban Cluster is designated on the Future Land Use Map and includes about 40,000 acres of unincorporated area generally surrounding and adjacent to the City of Gainesville at the geographical center of the County. The proposed designation of the “Employment Oriented Mixed Use” area as part of the Envision Alachua Sector Plan would potentially establish new urban land uses consisting of 8,700 residential dwelling units and 11.2 million square feet of non-residential development on 5,555 acres located at the closest point of the SR Job Center approximately four miles from the Urban Cluster (Map 4).

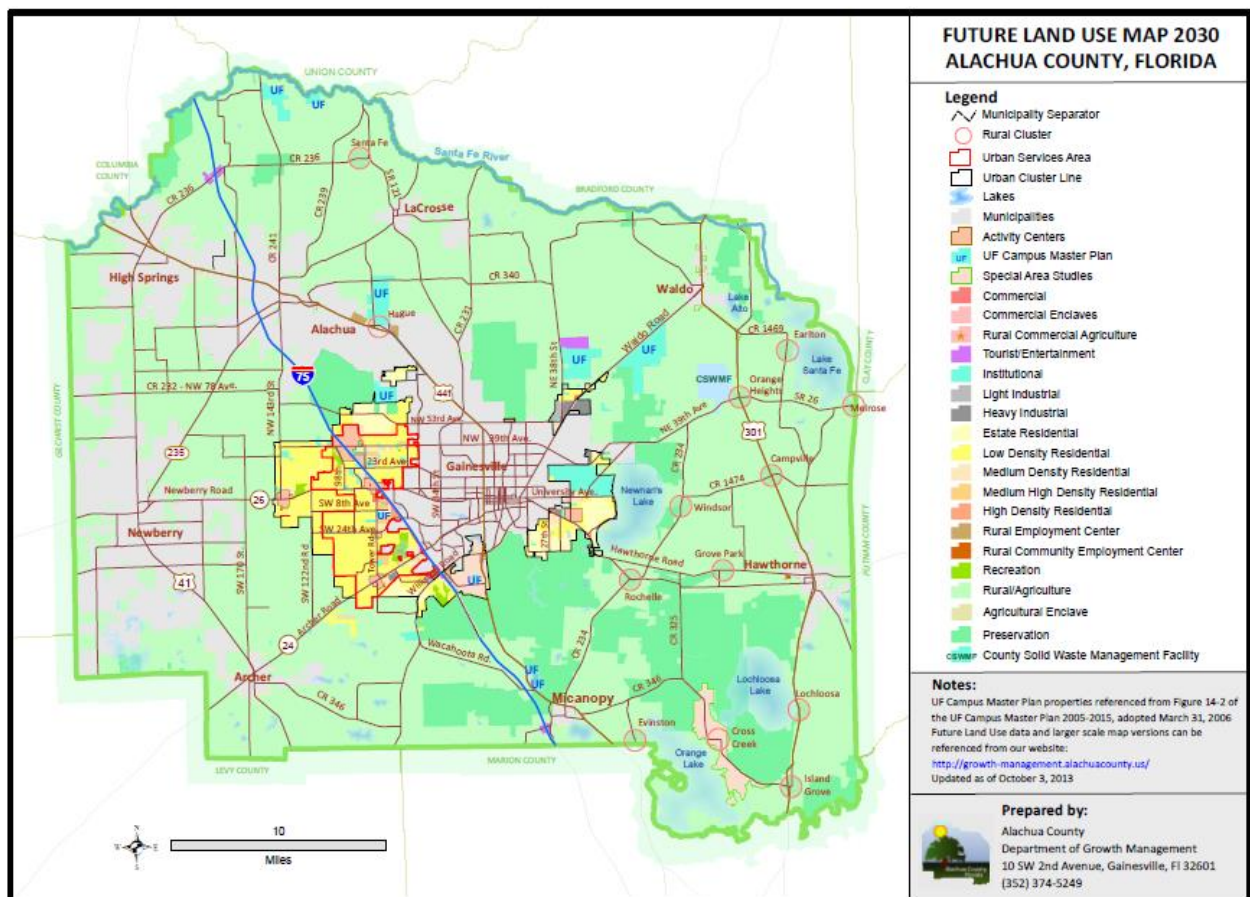


MAP 4: URBAN CLUSTER AND ENVISION ALACHUA SECTOR PLAN CONTEXT MAP

The establishment of the Urban Cluster boundary in the County’s adopted Comprehensive Plan took into account a combination of factors, including the existing geographic extent of centralized water and sewer lines, the need to promote economic development in this area, the existence of a transportation network including public transit, and the presence of significant

natural features such as karst topography to the west, and wetlands and conservation areas to the east and south, which limit the potential for new development. The following bullet points describe the basis for the Urban Cluster.

- The Urban Cluster recognizes an existing pattern of urban development and a system of urban infrastructure in the unincorporated areas adjacent to and surrounding the City of Gainesville. The City of Gainesville is the urban center of Alachua County and the Urban Cluster serves as a functional extension of Gainesville in terms of providing continuity in the urban land use pattern, as well as in service provision.
- Urban services and infrastructure, such as road networks, public transit, potable water, sanitary sewer, solid waste collection, law enforcement, fire rescue, emergency medical services, recreation, and public schools, are generally available within most areas of the Urban Cluster. These services and infrastructure can also be provided, maintained, or expanded more efficiently and economically within a compact and defined area; this provides for more efficient use of County resources as part of the capital improvements planning and budgeting process. The efficient provision and maintenance of infrastructure and other services has a direct effect on the long-term fiscal health and taxing levels of the County.
- Most of the Urban Cluster is more environmentally suitable for future urban development than the surrounding areas of unincorporated Alachua County. Much of the area surrounding the Urban Cluster boundary is a combination of public preservation lands, karst topography, aquifer high recharge areas, wetlands, floodplains or other natural resources that limit their suitability for new urban development.
- The Urban Cluster line provides separation of urban and rural areas, which helps to protect existing agricultural lands and rural residential areas from encroachment by urban development, which is often referred to as urban sprawl. This separation of urban and rural areas enables preservation of significant environmentally sensitive lands and historic resources within the rural areas of the County.
- The designation of the Urban Cluster is one mechanism used by Alachua County to discourage the proliferation of urban sprawl as required by Section 163.3177(6) (a) 9.a, F.S., which states, “The future land use element and any amendment to the future land use element shall discourage the proliferation of urban sprawl.”
- New development is more cost effective in areas where the necessary public facilities and services to serve that development are already in place.



MAP 5: ALACHUA COUNTY FUTURE LAND USE MAP 2030

By contrast, the Comprehensive Plan designates most of the areas outside the Urban Cluster as Rural/Agriculture land use (Map 5, green area). New urban development in the Rural/Agriculture land use areas is not planned or encouraged by the County's Comprehensive Plan. These areas are generally limited by policy to agricultural uses and rural residential uses with a maximum density of one dwelling unit per five acres. There are limited levels of public services and infrastructure provided or planned within the Rural/Agriculture areas. Extension of centralized potable water and sanitary sewer lines into the Rural/Agriculture areas are prohibited by policy, except in very limited instances.

In addition, individual household energy consumption is greatly increased in developments outside of the urban area and even on the urban fringe. Numerous studies have found a reduction in energy consumption in urban, mixed use, multi-modal areas. One study, conducted by the U.S. Environmental Protection Agency, found that "... individual households that shift from urban fringe to infill locations typically reduce Vehicle Miles Traveled (VMT) and emissions by 30-60%, and in typical U.S. cities, shifting 7-22% of residential and employment growth into existing urban areas could reduce total regional VMT, congestion and pollution emissions by 2-7%." (Excerpted from *Evaluating the Fiscal Impacts of Development Part 1- Final Report and User's Manual*, New Hampshire Office of Energy and Planning, June 2012)

The area proposed for development of the Envision Alachua Sector Plan is well outside of the Urban Cluster boundary as shown on Map 4. Through amendments to the Principles and General Strategies in the Comprehensive Plan the applicant is proposing to consider the urban land within the EOMU as an urban cluster. Two separate boundaries are defined and non-urban land is dispersed throughout. This rural area of the County is not appropriate for urban development and has no existing or planned urban infrastructure, public facilities or services. The proposed uses and intensities and densities of development for the two sub-areas in the Envision Alachua Employment Oriented Mixed Use area are urban uses that would require urban infrastructure, public facilities and service levels. In addition, all of the area proposed for the densest and most intense development is designated Strategic Ecosystem in the Comprehensive Plan. The Comprehensive Plan contains a set of policies that proposed development within Strategic Ecosystems must follow. Below is a discussion of what could be developed today under the County's policies for rural residential development and strategic ecosystems contrasted with what the proposed Envision Alachua Sector Plan policies would allow. In staff's professional opinion, this area of the County is not suitable for the level of development that the proposed Envision Alachua Sector Plan would allow.

c. Comparison of Potential Development Under the County's Current Comprehensive Plan Policies to Proposed Development Program

Policies in the Comprehensive Plan provide that clustered design is preferred for new residential subdivisions in Rural/Agriculture areas. New residential subdivisions of 25 or more lots in the Rural/Agriculture area must be designed as rural clustered subdivisions in order to preserve continued agriculture uses and protect conservation resources. A rural clustered subdivision design requires that a minimum of 50% of the property must be set aside as open space, with residential lots clustered on the other 50% of the property. New rural residential subdivisions that contain more than 100 lots may be allowed only after adoption of a comprehensive plan amendment based on a completed special area study that ensures natural resource protection and available public facilities. A special area study is an extensive public process and comprehensive plan amendment with public hearings and public participation. Such a study is required to address factors such as natural resource protection, stormwater, transportation impacts, community services, fire protection, and impacts on surrounding land uses.

Exercise: Potential Uses Allowed Under Current Policies and Regulations vs. Proposed Uses

Within the EASP, approximately 29,880 acres are available to develop at Rural/Agriculture land use densities based on a total application acreage of 52,745 acres, less 22,865 acres of lands with existing conservation easements (*i.e.*, with no development rights).¹ Of those 29,880 acres, approximately 27,040 acres are within designated strategic ecosystem and 2,840 acres are not.² Development potential is calculated slightly differently for the two areas.

Strategic Ecosystem:

The maximum gross density allowed in Rural/Agriculture land use is one unit per five acres.³ Therefore, the maximum development potential of the 27,040 strategic ecosystem acres is 5,408 units.⁴ Of the 27,040 acres, approximately 11,173 acres are wetlands and 15,867 acres are uplands.⁵ For this exercise, it is assumed that within strategic ecosystems all wetlands are preserved along with one half of uplands.⁶ As a result, approximately 19,107 acres of the 27,040 total strategic ecosystem acres would be preserved.⁷ The remainder, approximately 7,933 upland acres, is available for development.⁸ Further, assuming that the 7,933 acres would be developed according to clustering provisions under Future Land Use Element Policies 6.2.9 – 6.2.14,⁹ an applicant would be entitled to a total of two units in addition to the number units based on the gross density, plus one additional unit per every 10 acres of conservation area set aside as open space.¹⁰ Therefore, up to 7,318 units would be permitted on the 7,933 acres of developable land within strategic ecosystem assuming compliance with other Comprehensive Plan and ULDC development standards.¹¹

Non-Strategic Ecosystem:

Approximately 2,840 acres of land are not within strategic ecosystems. The maximum gross density allowed in Rural/Agriculture land use is one unit per five acres.¹² Therefore, the

¹ Acreages taken from application

² Acreages calculated by County staff

³ Future Land Use Element Objective 6.2

⁴ 27,040 acres x 1 unit / 5 acres = 5,408 units [Note: fractional units are rounded down]

⁵ Acreages calculated by County staff based on SJRWMD 2009 and SRWMD 2010 land use/land cover files, as appropriate.

⁶ Conservation & Open Space Policies 4.7.4 and 4.10.5

⁷ Acres preserved = wetland acres + ½ upland acres = 11,173 wetland acres + (½)(15,867 upland acres) = 11,173 + 7,933.5 = 19,106.5 = 19,107

⁸ Acres available for development = total acres – acres preserved = 27,040 – 19,107 = 7,933

⁹ Conservation & Open Space Element Policy 4.10.3

¹⁰ Future Land Use Element Policy 6.2.10(d)

¹¹ Total units = units allowed based on gross density + 2 units + acres preserved x 1 unit / 10 acres = 6,533 + 2 + 19,107 x 1/10 = 5,408 + 1,910.7 = 7,318.7 = 7,318

¹² Future Land Use Element Objective 6.2

maximum development potential of the 2,840 non-strategic ecosystem acres is 568 units.¹³ Rural / Agriculture cluster subdivisions are required to place a minimum of 50 percent of the total area in open space.¹⁴ As a result, a default minimum of 1,420 acres of the 2,840 total non-strategic ecosystem acres would be preserved (and an equal number would be available for development).¹⁵ A Rural Agriculture cluster subdivision on the 1,420 developable acres would be entitled to a total of two units in addition to the number of units based on the gross density, plus one additional unit for every 10 acres of conservation area set aside as open space.¹⁶ Therefore, a maximum of 712 units theoretically would be available in the absence of additional constraints.¹⁷ Additional constraints, however, do exist. Of the total 2,840 non-strategic ecosystem acres, approximately 2,385 acres are protected conservation resources.¹⁸ As a result, there are only 455 non-conservation acres available for clustered development. As the minimum lot size allowed in Rural/Agriculture Clustered Subdivisions generally is one acre,¹⁹ development would be limited to a maximum of 455 units instead of the 712 units theoretically allowed. Obtaining the actual unit number would require a detailed site analysis, however, and would probably result in even fewer units.

Combined development for the two areas, under current county policies and regulations, without adjusting for other likely property or environmental constraints, would be approximately 7,773 residential units on 8,388 acres. A full analysis including engineering would be necessary to obtain the actual number of residential units that could be built on the property. Comprehensive Plan Policy 3.6.7 states *“Development shall not be allowed at the maximum densities and intensities of the underlying zoning district, if those densities would be harmful to the natural resources.”* The natural resources located throughout this Envision Alachua Sector Plan property create a fragmented property with limited access and these issues would be taken into account when reviewing development proposals. In addition, right-of-way and other subdivision requirements that must be met to develop this fragmented property would likely result in far fewer than 7,773 residential units being able to be developed. No non-agricultural retail, commercial, or industrial development would be allowed by right.

Contrast this development potential with the EASP application, which is proposing 8,700 residential units and 11.2 million square feet of non-residential development on 5,555 acres

¹³ 2,840 acres x 1 unit / 5 acres = 568 units [Note: fractional units are rounded down]

¹⁴ Future Land Use Element Policy 6.2.12(a)

¹⁵ Minimum acres preserved = total acres x ½ = 2,840 x ½ = 1,420

¹⁶ Future Land Use Element Policy 6.2.10(d)

¹⁷ Total units = units allowed based on gross density + 2 units + acres preserved x 1 unit / 10 acres = 568 + 2 + 1,420 x 1/10 = 570 + 142 = 712

¹⁸ Approximately 2,056 acres of wetlands plus an estimated 329 acres of required wetland buffers (wetland acreage calculated by County staff based on SJRWMD 2009 and SRWMD 2010 land use/land cover files, as appropriate; buffer acreage based on a standard 75-foot buffer on all wetlands)

¹⁹ ULDC Chapter 407, Article 8 (Subdivision Regulations), Table 407.78.1

with an additional 1,961 acres of EA-RUR (similar to existing Rural/Agriculture land use with maximum one unit per five acre residential densities) that could provide 392 units or more based on clustering provisions. Numbers are shown in table below:

TABLE 1. PROPOSED EASP DEVELOPMENT ENTITLEMENTS

Development Sub-Areas	Total Acreage	Residential	Non-Residential sq. ft.
EA-EOMU	5,555	8,700 max	11.2 million
EA-RUR	1,961	392+	0
TOTAL	7,556	9,092+ max	11.2 million

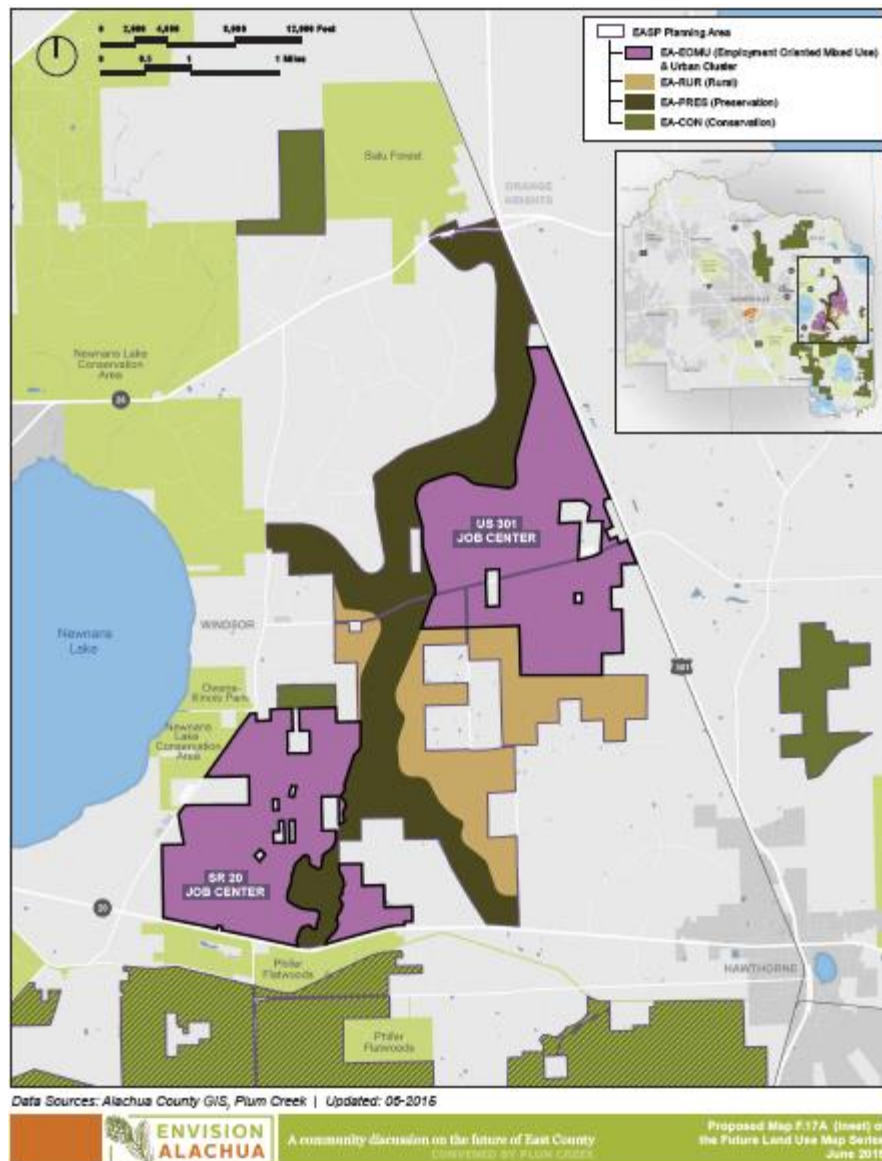
So, without getting into specific design standards and site locations, the applicant proposes 8,700 residential units and 11.2 million square feet of non-residential uses on a total of 5,555 acres, with additional rural/ag densities on 1,961 acres, while current policies and regulations would potentially allow up to a maximum of 7,773 units and zero non-residential on 8,388 acres. Based on this simplified number crunching, the applicant has proffered no significant difference in the amount of conservation set asides outside of their proposed development areas than what could currently be required under existing code requirements, but has requested an additional 1,000+ residential units and 11.2 million square feet of non-residential with weaker wetland and floodplain protection standards.

2. Proposed Development Program

The Envision Alachua Employment Oriented Mixed Use (EA-EOMU) land use designation proposes a mix of Research and Development, manufacturing, commercial and residential uses in two areas within the boundaries of the proposed EA-EOMU designated property (see Map 6). The permitted uses within the proposed EA-EOMU land use designation would be “the full range of employment based uses including wholesale, warehousing, storage and distribution, research and development, and industrial/manufacturing uses; the full range of residential uses including accessory dwelling units; supporting commercial uses (office, retail, hotel, and service uses); neighborhood-scale commercial uses; university campuses, public and private educational facilities, civic and public uses; recreation uses; agriculture and silvicultural uses; excavation and fill operations; and conservation uses. The range of allowable uses shall be broadly interpreted so as to allow those types of uses compatible with uses listed herein and consistent with the overall intent of the applicable policies”. (Proposed **EASP Policy 10.2.6**).

EASP policies are proposed that prescribe a maximum development program including permitted uses and density, intensity and mix of uses for the SR 20 Job Center (Proposed **EASP Policies 10.3.3.1, 10.3.3.2, 10.3.3.3**) and the US 301 Job Center (Proposed **EASP Policies 10.3.4.1, 10.3.4.2, 10.3.4.3**) in the EOMU. As a note to proposed **EASP Policies 10.3.3.1** and **10.3.4.1** the application states “The maximum development program described for the entire

land area assigned EA-EOMU is established by proposed **EASP Policy 10.3.1** and serves to limit the maximum development program that can be achieved within the SR 20 Job Center and the US 301 Job Center. Proposed **EASP Policy 10.3.1** lists the maximum development program as 8,700 residential units and 11.2 million square feet of non-residential. The potential ranges for each use are quite large and the specifics will be determined at each DSAP (proposed **EASP Policy 10.6.4**). There are policies proposed that would prohibit DSAPs with only residential uses (proposed **EASP Policy 10.6.4**) Proposed **EASP Policy 10.2.6.3** also limits the residential units to 1,500 until at least 1 million square feet of non-residential is built or under construction. This policy also contains a jobs-to-housing balance of 2.5 jobs per unit that must be met within each DSAP. Non-residential development could be built but residential would not be allowed to exceed the balance. In addition to the wide ranges of development potential that could be permitted, the proposed policies are written broadly to require the mix of uses though the actual existence of a mix of uses assumes that each DSAP would be built-out entirely.



MAP 6: ENVISION ALACHUA SECTOR PLAN PROPOSED EMPLOYMENT ORIENTED MIXED USE LAND USE DESIGNATION

3. Compatibility with Surrounding Areas

The subject area of the County is rural in nature with rural residences on well and septic and farms within the boundaries of, or adjacent to, the proposed Envision Alachua-Employment Oriented Mixed Use area. Rural homesites and farms on lots generally three acres and larger are also scattered throughout the eastern part of the County. The rural character of this part of the County extends into the neighboring counties of Putnam, Marion and Clay Counties. The Rural Clusters of Windsor, Campville, Grove Park and Rochelle are also either adjacent to or in close enough proximity to be substantially affected by urban development of this intensity and density. Maintaining and preserving the rural character of these historic settlements and of this area of the County would be very difficult with the type of development proposed in the

Envision Alachua Sector Plan. The Envision Alachua Sector Plan is not compatible with the rural character of this part of the County.

4. Internal Consistency with the Comprehensive Plan

a. Overview of the Comprehensive Plan

The Alachua County Comprehensive Plan is adopted by the Board of County Commissioners to guide economic growth, development of land, protection of natural resources, and the provision of public services and facilities in Alachua County. The Plan implements the community's vision through those policies that achieve and maintain the quality of life desired by residents and business owners in Alachua County. The Future Land Use Element serves as a guide for the sustainable development and use of land. This includes the determination of an efficient pattern and location of future land uses through the relationship between land use and the transportation system, the provisions of public facilities and services, and the protection of the natural environment. The Plan contains fifteen elements: future land use, transportation mobility, housing, potable water and sanitary sewer, solid waste, stormwater management, conservation and open space, recreation, intergovernmental coordination, capital improvements, economic, historic, public school facilities, community health, and energy. The Plan serves as a basis for development regulations, budgeting, and other measures that carry out the community's vision.

At the beginning of the Future Land Use Element there is a set of short statements about the Plan consisting of an overarching goal, four broad principles, and statements of three general strategies to implement those principles. These short statements summarize the basic principles upon which the Plan is based and the major themes and components of the Plan. These statements, principles and strategies are inter-related and consistent with each other and are translated into goals, objectives, policies and related maps within the fifteen elements of the Plan. The goals, objectives and policies focus on various aspects of development such as land use, provision of public facilities and services, protection of natural resources and other subjects such as intergovernmental coordination, energy conservation, protection of historic resources, community health and economic development. These policies prescribe decision making by the County primarily about where, what, and how future development and related infrastructure in the unincorporated area of the County is to be undertaken.

The Comprehensive Plan Principles and General Strategies are:

Goal

Encourage the orderly, harmonious, and judicious use of land consistent with the following guiding principles

Principles:

- Promote sustainable land development that provides for a balance of economic opportunity, social equity including environmental justice, and protection of the natural environment;
- Base new development upon the provision of necessary services and infrastructure. Focus urban development in a clearly defined area and strengthen the separation of rural and urban uses;
- Recognize residential neighborhoods as a collective asset for all residents of the County; and
- Create and promote cohesive communities that provide for a full range and mix of land uses.

This application proposes to amend Principle 2 (second bullet above) to read:

Base new development upon the provision of necessary services and infrastructure. Focus urban development in a clearly defined area and strengthen the separation of rural and urban uses

General Strategies to implement the Guiding Principles:

GENERAL STRATEGY 1

Minimize the conversion of land from rural to urban uses by maximizing the efficient use of available urban infrastructure, while preserving environmentally sensitive areas, according to the following:

- Designate and maintain on the Future Land Use Map an urban cluster that sets a boundary for urban growth.
- Provide incentives for higher average densities for residential development and mixed uses in the urban cluster, including density bonuses and transfer of development rights.
- Provide a range of urban residential densities with the highest densities located in or near urban activity centers, and lower densities located in outlying rural areas or areas of the County that have physical limitations to development.
- Utilize mechanisms such as land acquisition, conservation easements, variable lot sizes and conservation subdivisions.
- Preserve ecosystems of a given area and incorporate hazard-resilient land planning.
- Time development approval in conjunction with the economic and efficient provision of supporting community facilities, urban services, and infrastructure, such as streets, utilities, police and fire protection service, emergency medical service, mass transit, public schools, recreation and open space, in coordination with policies in the Capital Improvements Element.

GENERAL STRATEGY 2

Promote land development that maximizes the use of public investments in facilities and services, ensures a proper level of public services for all new development, and preserves existing amenities. Land use decisions shall be made consistent with public facility improvements which shall be provided in accordance with the following priorities:

- in areas where the lack of public facilities threatens the health and safety of the community;
- in urban areas that are lacking adequate public facilities to meet the needs of existing development and to encourage infill development, and mixed-use redevelopment;
- in new areas which are part of a planned expansion of public services to encourage growth; and
- to extend individual services to meet the demands created by a specific development.

GENERAL STRATEGY 3

Promote the spatial organization of neighborhoods, districts, and corridors through urban design codes, incorporating graphics that serve as predictable guides for community development. Implementation shall be through a combination of standard requirements and incentives, creating a planning framework that includes provisions to:

- Create neighborhoods that are compact, connected to adjacent development, have limited mixed uses at centers, and have interconnected, mixed modal streets with pedestrian, bicycle, and transit friendly areas.
- Integrate civic, institutional, and commercial activity in neighborhoods and districts, not isolated in remote, single-use complexes.
- Avoid large areas of single-use, similar densities, and similar types of units. A diverse mix of land uses, housing types and costs and densities shall be promoted. Identify locations or districts where special or single use activities shall be allowed or restricted (e.g., large scale retail or industrial areas).
- Link corridors that are regional connectors of neighborhoods and districts, ranging from parkways and transit lines to watersheds and greenways.
- Provide for infill where appropriate.

The Envision Alachua Sector Plan proposes changes to General Strategy 1 and proposes a new General Strategy 4. In addition, this application proposes to amend the definition of Urban Cluster. The proposed amendments to the strategies and the definition are below:

GENERAL STRATEGY 1

Minimize the unplanned conversion of land from rural to urban uses by maximizing the efficient use of ~~available~~ urban infrastructure, while preserving environmentally sensitive areas, according to the following:

- Designate and maintain on the Future Land Use Map ~~an~~ one or more urban clusters that sets a boundary for urban growth.
- Engage in the long-term planning for conservation, development, and agriculture for substantial geographic areas that include at least 15,000 acres on a regional scale through the Sector Planning process.
- Provide incentives for higher average densities for residential development and mixed uses in ~~the~~ an urban cluster, including density bonuses and transfer of development rights.

...

Urban Cluster. An area designated on the Future Land Use Map for urban development, which includes residential densities ranging from one unit per acre to 24 units per acre or greater, non-residential development, and is generally served by urban services. References to ‘the urban cluster’ within the Goals, Policies and Objectives of this Plan refer to ‘any’ urban cluster.

Proposed New General Strategy 4:

GENERAL STRATEGY 4

Promote land development that creates economic development opportunities to support and enhance the innovation economy of Alachua County. Implementation shall be through policies and processes that recognize the following components of the planning framework:

- Create economic progress opportunities that support and enhance the innovation economy, provide job opportunities and services at all economic levels, and ensure a robust and sustainable community.
- Protect and retain regionally significant lands for conservation, habitat protection and wildlife connectivity.
- Support the development of communities that have a balanced and compatible mix of land uses and employ environmentally sustainable development practices while conserving lands to protect ecosystems and wildlife corridors.
- Address long-term needs for water supply, water quality, and water conservation.
- Attract development that supports a sustainable economic future for residents at all wage and skill levels while being compatible with community goals for land conservation and natural resource protection.
- Maintain agriculture and silviculture as viable and sustainable economic activities.

- Develop partnerships with utility providers for planning and delivering required infrastructure.
- Are within a Sector Plan.

Seven of the eight bullet items in this new proposed strategy statement are in the form of action statements about policies and processes, *i.e.*, (1) “**create** economic progress opportunities to support and enhance the innovation economy, provide job opportunities....,” (2) “**protect and retain** regionally significant lands,” (3) “**support** the development of communities that have a balanced and compatible mix of land uses...while conserving lands to protect ecosystems...,” (4) “**address** long term needs for water supply....,” (5) “**attract** development that supports a sustainable economic future for residents at all wage and skill levels...,” (6) “**maintain** agriculture and silviculture as viable and sustainable economic activities;” (7) “**develop** partnerships with utility providers for planning and delivering required infrastructure” (*note numbers in parentheses have been added for reference*). The eighth bullet, *i.e.* “Are within a Sector Plan”, is unlike the other bulleted items and not in the form of an action statement about policies and processes. Much of this proposed new “general strategy” and the seven bullet action items listed are about subject matter that is already addressed in the County’s Comprehensive Plan in the principles and strategies adopted in the Plan and in the particular goals, objectives and policies that are within the elements of the Plan. As such, the proposed strategy appears to be redundant and unnecessary. Because the final bullet seems to limit this strategy to the proposed new EASP objectives and policies, the location of an additional strategy statement such as this in the section of the County’s Plan stating overall Goals, Principles, and General Strategies is misplaced since this section applies to the County’s Comprehensive Plan as a whole. Again, it is also unnecessary as all but the last bullet in proposed General Strategy 4 are reiterations of the County’s other General Strategies. If it is intended as a strategy just for the proposed **EASP Objective 10.1** and the related policies proposed to be added to the Future Land Use Element and the proposed **EASP Objective 1.2** and related policies proposed to be added to Transportation Mobility Element, the location of an additional strategy statement such as this in the section of the County’s Plan stating overall Goals, Principles and General Strategies is misplaced since this section applies to the County’s Comprehensive Plan as a whole.

Proposed **EASP Policy 10.1** states that “The Envision Alachua Sector Plan is consistent with the Future Land Use Element planning principles adopted by Alachua County which function to guide the County’s future land use policy” and then there are a series of four proposed **EASP sub-policies (10.1.1.1 through 10.1.1.4)** describing how the EASP “supports” these principles. Comprehensive plans and plan amendments must be internally consistent. As discussed above, the Principles adopted in the County Plan are linked with General Strategies to implement those principles, which in turn are translated into more specific Goals, Objectives and Policies and adopted future condition maps focusing on land use, public facilities and services, and protection of natural resources in the various elements of the Plan. All of these parts of the

Comprehensive Plan are inter-related and consistent with each other, as required by the Community Planning Act in Florida Statutes and the County's Comprehensive Plan:

"...The sections of the comprehensive plan containing the principles and strategies, generally provided as goals, objectives and policies shall describe how the local government's programs, activities and land development regulations will be initiated, modified, or continued to implement the plan in a consistent manner...." Section 163.3177 (1), F.S., and "...Coordination of the several elements of the local comprehensive plan shall be a major objective of the planning process. The several elements of the plan shall be consistent...." Section 163.3177 (2), F.S.

Future Land Use Element Policy 7.1.23:

"All amendments shall be considered... in light of the Basic Principles upon which the plan is based and shall be consistent with all elements of the plan."

Therefore, assessment of the consistency of the proposed EASP amendments is a question of their consistency with the Plan as a whole, not just consistency with a single general principle or principles. The items discussed in proposed **EASP Policies 10.1.1.1 through 10.1.1.4** must be consistent with the principles in the adopted Plan and with the strategies to implement those principles and the more specific goals, objectives and policies to guide future decisionmaking about where uses of certain intensities and densities are to be located, including how natural resources are to be protected, how necessary infrastructure services are to be provided, and how cohesive communities with a full range of mixed uses are to be achieved through "meaningful and predictable standards for ...development of land..." (Section 163.3177(1), F.S.) These types of issues and how the new maps, objectives and policies proposed by this amendment to the County's Plan relate to the adopted Plan as a whole, as well as whether the amendment is supported by appropriate and relevant data and analysis, are the focus of most of the balance of this staff report.

The Envision Alachua Sector Plan proposes new urban land uses in the rural area of the County outside of the Urban Cluster. In order to analyze these proposed uses in this location, it is necessary to explain how the County has determined types and amounts of land uses within the Urban Cluster. This explanation is provided below, followed by an analysis of the proposed Envision Alachua Sector Plan and current Comprehensive Plan policies.

b. Urban Cluster Capacity

The capacity of the Urban Cluster is evaluated as part of the periodic update of the Comprehensive Plan, to determine a sufficient and non-excessive amount of land within the Urban Cluster to accommodate urban land uses for a ten-year and twenty-year time frame. This evaluation compares the forecasted need for land for urban residential and non-residential development based on projected populations, average household size, residential vacancy rate, and market factors. By using no longer than a twenty-year time horizon, there is some

reliability of the population projections. An Evaluation and Appraisal Report (EAR) is completed every seven years, which translates into a major comprehensive plan amendment. Between the EARs there are opportunities for other revisions, including privately-initiated comprehensive plan amendments. The most recent analysis of the Urban Cluster capacity was completed as part of the [Evaluation and Appraisal Report \(EAR\) on the Comprehensive Plan adopted in 2009](#). This analysis indicated that there was sufficient land available in the Urban Cluster to accommodate the projected unincorporated population growth through the Year 2035.

The 2009 EAR indicated that there were 37,507 acres within the unincorporated Urban Cluster. Of the total acres in the Urban Cluster, 15,532 acres were undeveloped at the time. The analysis indicated that 13,081 new residential dwelling units would be needed within the Urban Cluster to accommodate the projected unincorporated population growth through the Year 2035 and that the Urban Cluster had sufficient capacity for approximately 28,328 new residential dwelling units. The 2009 analysis found that there was more than twice the required capacity for new development within the Urban Cluster to accommodate the projected population growth in unincorporated Alachua County through 2035.

It should be noted that the year 2035 countywide “Medium” population projections provided by the Bureau of Economic and Business Research have been subsequently reduced since the 2009 EAR analysis as a result of the recent economic downturn. Consequently, the number of new residential dwelling units needed to accommodate projected population growth within the Urban Cluster would be less today than was projected as part of the 2009 EAR. Also, the EAR Urban Cluster analysis did not take into account new Comprehensive Plan policies adopted in 2010 which provide the potential for additional residential density in the Urban Cluster through the allowance for mixed-use Transit Oriented Developments and Traditional Neighborhood Developments. The Transit Oriented and Traditional Neighborhood Development policies have increased the development potential within the Urban Cluster.

The majority of new development authorized as part of final development plans in the unincorporated area over the past 20 years has been located within the Urban Cluster. Between 1994 and 2014, there were 22,422 new residential units included as part of final development plans in the unincorporated area. Of the total residential units, 21,202 (95%) were located within the Urban Cluster and 1,220 (5%) were located outside the Urban Cluster in Rural/Agriculture areas or Rural Clusters (Figure 1).

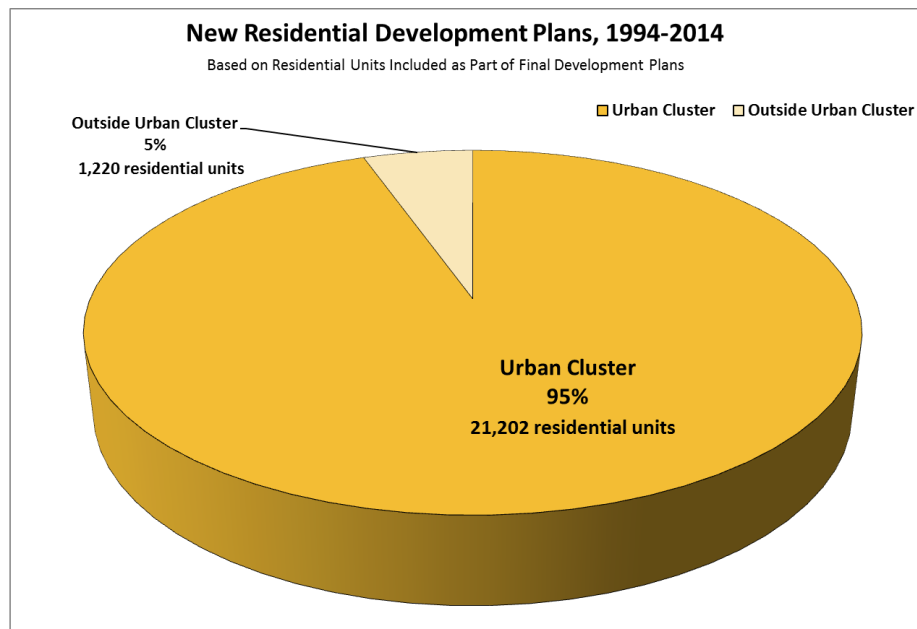


FIGURE 1: NEW RESIDENTIAL DEVELOPMENT PLANS, 1994 – 2014

Percentages based on the number of dwelling units included within final development plans in the unincorporated area between 1994 and 2014. Source: Alachua County Development Review Committee Database.

The number of actual single family permits issued in Unincorporated Alachua County for the past ten years is on Table 2.

TABLE 2. SINGLE FAMILY PERMITS ISSUED 2004 -2014, UNINCORPORATED ALACHUA COUNTY

Year	Urban	Rural
2014	148	34
2013	263	56
2012	175	42
2011	129	26
2010	162	48
2009	188	49
2008	186	72
2007	348	135
2006	495	207
2005	710	289
2004	620	275

Over the past 20 years, there has been approximately 3,404,498 square feet of new non-residential development included within final development plans in the unincorporated area. This includes commercial, industrial and office development. Of this total non-residential floor area, 3,177,342 (93%) was located within the Urban Cluster and 227,156 (7%) was located outside the Urban Cluster (Figure 2).

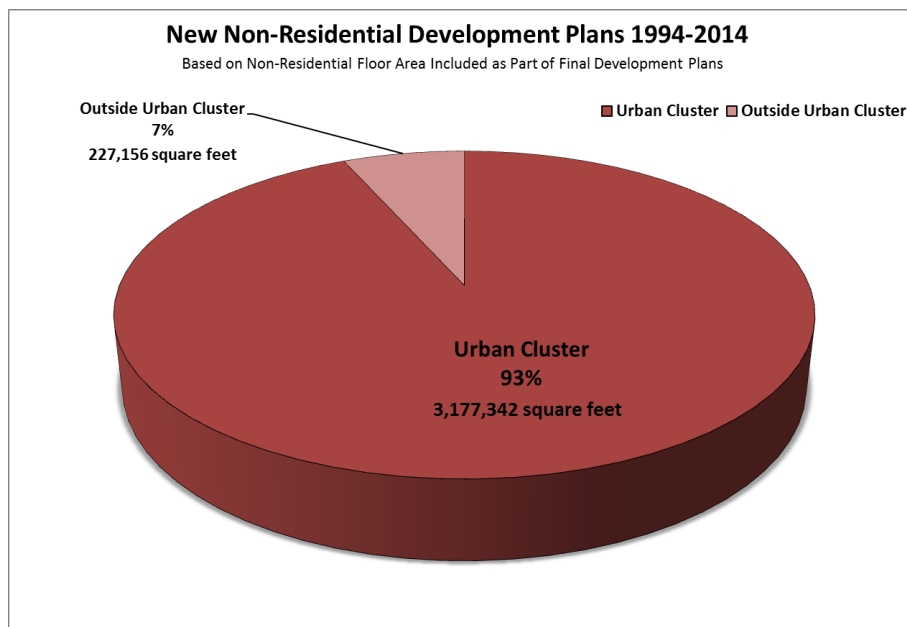


FIGURE 2: NEW NON-RESIDENTIAL DEVELOPMENT PLANS, 1994-2014

Percentages based on commercial, industrial, and office floor area included within final development plans in the unincorporated area between 1994 and 2014. Source: Alachua County Development Review Committee Database.

c. Analysis of Urban Cluster Expansion

Section 163.3177(1)(f)3, F.S., states “The Comprehensive Plan shall be based upon permanent and seasonal population estimates and projections, which shall either be those published by the Office of Economic and Demographic Research or generated by the local government based upon a professionally acceptable methodology. The plan must be based on at least the minimum amount of land required to accommodate the medium projections as published by the Office of Economic and Demographic Research for at least a 10-year planning period...” Future Land Use Element Policies 7.1.3 a – c provide a policy-based analytical framework for determining whether or not the County’s Comprehensive Plan contains a sufficient and non-excessive amount of land within the Urban Cluster to accommodate urban uses based on the population projections. Future Land Use Element Policy 7.1.3 must be analyzed for any proposed amendments to the Urban Cluster or amendments that would place urban land uses outside of the Urban Cluster as would the proposed Envision Alachua Sector Plan.

While it is a normal and customary part of planning to base land use designations on the need for a certain amount of available land within land use categories, Florida Statutes Section 163.3245 (3) (a) 7 states that “A long-term master plan [for a Sector Plan] adopted pursuant to this section is not required to demonstrate need based upon projected population growth or on any other basis.” The application proposes new urban uses in the rural area and considers this area an “urban cluster” held to the policies in the Plan that pertain to the current Urban Cluster. Though the applicant is not required to demonstrate need based on this section of

state statute, they have chosen to do so. Data and analysis was submitted that attempts to demonstrate a lack of sufficient industrial land uses within the Urban Cluster and a need for the industrial employment-oriented land uses on the subject property. Future Land Use Element Policies 7.1.3 a - c are policies that should be analyzed to determine whether there is a need to expand the Urban Cluster, which staff would consider this proposed amendment to be. If it is determined there is a need for additional lands to accommodate a specific use, Future Land Use Element Policy 7.1.3 d is a locational policy that must be analyzed if the analysis of a - c has determined there is a need to expand the Urban Cluster.

Future Land Use Element Policy 7.1.3

As part of the periodic update of the Comprehensive Plan and any proposed amendments to the Urban Cluster, determine a sufficient and non-excessive amount of land within the Urban Cluster to accommodate urban uses for a ten year and twenty year time frame.

(a) *The determination (methodology is shown in Appendix A) shall be based on a comparison of:*

- (1) *a forecast need for land for urban residential and non-residential development based on projected population, average household size, a residential vacancy rate, and a market factor. The market factor for the ten year time frame shall be 2.0. The market factor for the 20 year time frame shall be 1.5.*
- (2) *land available in the Urban Cluster for urban residential and non-residential uses. Mapping of environmentally sensitive areas shall be utilized as a factor for determining land availability*

(b) *If the comparison shows that the land available is less than the forecast need for land, the following measures shall be considered:*

- (1) *revisions to density standards and land development regulations, or other measures, to accommodate greater population within the existing Urban Cluster*
- (2) *coordination with municipalities regarding possible reallocation of forecast need to the incorporated areas*
- (3) *phased expansion of the Urban Cluster*

(c) *If the forecast need for one type of land use exceeds the supply of land for that particular use, a revision to the allocation of land uses within the Urban Cluster shall be considered before the Urban Cluster is expanded.*

(d) *If this methodology determines expansion of the Urban Cluster is warranted, the evaluation of appropriate location shall be subject to analysis including the following economic, infrastructure, transportation, and conservation and recreation criteria:*

- (1) *rural character and viable agriculture land and the potential impact of expansion of the Urban Cluster on existing agricultural uses.*

- (2) *economic development considerations including affordable housing*
- (3) *relationship to existing and planned future urban services and infrastructure*
- (4) *access to the regional transportation network and multi-modal transportation systems*
- (5) *Conservation and Preservation land uses*
- (6) *planned recreation/open space or greenway systems*

The proposed Comprehensive Plan amendment would designate new Urban Cluster areas within the existing rural areas of Alachua County. The new Urban Cluster areas would consist of the 5,555 acres of Employment Oriented Mixed Use areas shown on the proposed Future Land Use Map. The proposed **EASP Policy 10.3.1** indicates that these newly-designated Urban Cluster areas could potentially allow for the development of up to 8,700 residential units and 11.2 million square feet of non-residential development.

The capacity of the Urban Cluster is evaluated as part of the periodic update of the Comprehensive Plan, to determine a sufficient and non-excessive amount of land within the Urban Cluster to accommodate urban land uses for a ten-year and twenty-year time frame. This evaluation compares the forecasted need for land for urban residential and non-residential development based on projected populations, average household size, residential vacancy rate, and market factors. By using no longer than a twenty-year time horizon, there is some reliability of the population projections.

An Evaluation and Appraisal Report is completed every seven years, which translates into a major update of the Comprehensive Plan. In the time between Evaluation and Appraisal Reports, there are opportunities for other revisions, including through privately-initiated comprehensive plan amendments. The most recent analysis of the amount of land within the Urban Cluster to accommodate urban land uses was conducted as part of the 2009 Evaluation and Appraisal Report (EAR) and subsequent Comprehensive Plan update in 2011. As required by Future Land Use Element Policy 7.1.3(a), this analysis focused on the available residential land in the Urban Cluster to accommodate the projected population growth. The analysis indicated that approximately 13,081 new residential dwelling units would be needed within the Urban Cluster to accommodate the projected unincorporated population growth through the year 2035, and that the Urban Cluster had sufficient capacity for approximately 28,328 new residential dwelling units. The 2009 data indicated that there was more than twice the necessary capacity for new residential development within the Urban Cluster to accommodate the projected population growth in unincorporated Alachua County through 2035.

The 2009 EAR Urban Cluster analysis did not take into account the Comprehensive Plan policies that were adopted in 2010 which provide the potential for additional residential density in the

Urban Cluster through Transit Oriented Development and Traditional Neighborhood Development. The Transit Oriented and Traditional Neighborhood Development policies have increased the capacity of the Urban Cluster to accommodate new residential and non-residential development.

In addition to the 2009 Urban Cluster residential analysis, County staff compiled information on the amount of land designated for non-residential uses in Alachua County as of 2014. The information prepared by County staff indicates that there is a significant amount of undeveloped land that is currently designated for industrial, commercial, or office uses in the County, and that these lands are strategically located proximate to existing economic and physical infrastructure such as Gainesville Regional Airport, Interstate-75, railroad lines, communication networks, local road networks, and centralized potable water and sanitary sewer systems. The majority of these lands are located within incorporated cities or within the unincorporated Urban Cluster.

The countywide supply of undeveloped lands designated for non-residential use includes approximately 4,500 undeveloped acres designated for industrial uses, 3,700 undeveloped acres designated for commercial uses, and 252 undeveloped acres designated for office uses. If these undeveloped lands were to be developed with new industrial, commercial, and office uses in the future, this could potentially generate a significant number of new jobs within Alachua County (for further detail, see Appendix 3, Inventory of Industrial, Commercial, and Office Lands). The County's inventory of lands designated for non-residential uses in Appendix 3, and the analysis of the residential capacity of the Urban Cluster as part of the 2009 EAR, show that there is not a need for additional land designated for urban development in the County.

The application contains a document prepared by CHW, Inc., titled "Industrial Lands Needs Analysis", dated February 17, 2014. The applicant's analysis asserts that there is a deficiency of industrially-designated land within Alachua County, and that employment-oriented lands need to be increased. The applicant's report suggests that there is a lack of sites that are of sufficient size (defined by applicant as at least 500 acres) to accommodate large-scale industrial uses for "substantial job creation". The applicant's report does not indicate the basis for this 500-acre threshold and does not provide any evidence that there is a need or a market for industrial sites of this size in Alachua County. It is noted that the application does not contain any analysis of the need for additional lands for urban residential development.

It is staff's opinion that the applicant's industrial needs analysis does not provide a complete inventory of the available lands for industrial use in Alachua County, and therefore is not the best available data on industrial land use need. It appears as if only for-sale property was considered in the inventory of available industrial lands. Currently-for-sale inventory, however,

is not an appropriate basis to analyze a plan with a 50-year time frame, as properties that are offered for sale or lease are constantly changing.

Even if it were determined that a need existed for additional land designated for urban uses, Future Land Use Element Policy 7.1.3 (c) requires that *“a revision to the allocation of land uses within the Urban Cluster shall be considered before the Urban Cluster is expanded.”* The application proposes to designate new Urban Cluster areas outside of the existing Urban Cluster, but has not demonstrated that revisions to density standards, reallocation of the forecast need to the incorporated areas, or revision to the allocation of land uses within the Urban Cluster has been considered.

While the County’s review of available data on the amount of land designated for urban residential and non-residential uses shows an adequate supply of undeveloped land in the County, staff also analyzed the locational policies found in Future Land Use Element Policy 7.1.3 (d) that are normally only considered once a need to expand the urban cluster has been determined. That analysis follows.

Future Land Use Element Policy 7.1.3(d)1 states that rural character and viable agriculture land are issue to be analyzed in expansion of the urban cluster. The Comprehensive Plan designates the unincorporated areas outside the Urban Cluster (rural areas) as a combination of agriculture, rural residential uses and large-scale preservation of environmentally sensitive areas. Areas outside the Urban Cluster are not designated for future urban development or related public investment in urban infrastructure and services. Most of the unincorporated rural area is designated as ‘Rural/Agriculture’ under the Comprehensive Plan. The Rural/Agriculture policies promote the continuance of viable agriculture in Alachua County, protection of rural character, and the preservation of open space and environmentally sensitive lands.

The area of the County where Plum Creek has proposed the EA-EOMU (Envision Alachua Employment Oriented Mixed Use) designation primarily designated Rural/Agriculture on the adopted Future Land Use Map 2030. Residential land uses in the Rural/Agriculture areas are limited to a density of less than or equal to one dwelling unit per five acres. There are two Rural Clusters that are partially within this EA-EOMU area (Campville and Grove Park) that have limited opportunities for infill, typically on one acre lots. These rural clusters are partially surrounded by the proposed Envision Alachua Sector Plan property. Several private rural residential properties and farms are entirely surrounded by proposed EASP lands or the Plum Creek property annexed into Hawthorne. Other rural residences are adjacent to, or nearby, the EASP property. The areas of the Rural Clusters not owned by Plum Creek and these other private properties are not a part of the proposed Envision Alachua Sector Plan. The intense and dense urban land uses proposed would greatly increase traffic in these areas.

Most of the land used for agriculture within the proposed EA-EOMU designation is Plum Creek's timberland. Timber is considered an agricultural pursuit and is compatible with the rural character of the area. A multi-use development with 8,700 homes and 11.2 million square feet of non-residential would be a suburban or urban pattern of development and would not be compatible with the surrounding rural areas.

FLUE Policy 7.1.3(d)2 states that economic development including affordable housing should be considered in evaluating appropriate locations of new land uses. A major emphasis of the proposed policies and background material submitted with the application is economic development. An applicant-submitted report titled *Plum Creek, UF and Economic Growth in the Gainesville Region* by Jim Dewey, Dave Denslow and Ray Schaud provides data and analysis that is meant to support the philosophy that, if Plum Creek develops this property, "which would provide 30,000 jobs above the current growth trend over 50 years", "there is no reason based on the available data to think that Alachua could not achieve whatever growth path it chooses for itself over half a century." (p. 31) The report also concludes that "Over a horizon of 50 years, it makes little sense to imply anything is known with a high degree of certainty – there are too many things about the future that are crucial but unknown." (p. 31) In other words, Plum Creek's proposed land uses may provide economic development opportunity over the next 50 years or they may not, it is impossible to predict. Proposed **EASP Policy 10.2.6.3** states in part that:

The EA-EOMU shall create regional scale economic development opportunities that support and enhance the innovation economy of Alachua County and cohesive communities that support these economic opportunities through a mix of land uses. The DSAP approval process shall prohibit the establishment of a DSAP in which the EOMU contains only residential uses. The EA-EOMU shall:

- a. Achieve a jobs-to-housing balance of 2.5 jobs per residential unit that is measured over the entire land use category (that is, jobs divided by residential units meets or exceeds 2.5 at total project build out).

The applicant has revised their job projection numbers down from 3 to 2.5 per residential unit as a result of lowering the employees per square foot for each type of job and removing jobs and housing to the property proposed for annexation into Hawthorne. The projected three jobs per residential unit equates to the 30,000 jobs used in the *Plum Creek, UF and Economic Growth in the Gainesville Region* report discussed above, but the 30,000 job projection is too high because it has not been updated with the new jobs to housing balance of 2.5 jobs per residential unit and the applicant is now using a lower employee per square foot calculation. The *Fiscal Impacts of the Envision Alachua Sector Plan for Alachua County* analysis by Fishkind & Associates Economic Consultants submitted with the application indicates that the number of

employees for the development program at buildout is 25,848 (Appendix Table 1A, Year 2072). This assumes full build-out of the development.

In addition to determining whether this proposed amendment would generate almost 26,000 jobs, there are other aspects that the applicant's report should have considered. The costs to the County to provide urban service to this rural location and environmental impact costs are not factored into the economic analysis. The applicant's report also does not take into account whether this type of growth would be more efficient and fiscally beneficial to the County and its citizens if proposed within the Urban Cluster. The best location for the proposed land uses, even within Plum Creek's own property, was not adequately evaluated. The report does not reach a solid conclusion and the data do not support the proposed amendment to the County's current land use designations for the area.

The Principles and Strategies in the adopted Comprehensive Plan relating to promotion of economic opportunity and a sustainable and economic future of residents at all wage and skill levels are translated into more detailed policies primarily in the Future Land Use Element and the Economic Element of the adopted Comprehensive Plan. One of the issues addressed in the *2009 Evaluation and Appraisal Report* (pp. 138-151) on the Alachua County Comprehensive Plan was the changing nature of industrial uses in the 21st century and the relationship of those changes to the type and location of space for those uses sought by emerging types of businesses. A strategy identified in the EAR to address this change was to "update policies on Industrial and Office land use consistent with employer workforce needs and emerging Industrial and Office trends to facilitate recruiting of targeted industries to the County." Based on this, as part of the County's Comprehensive Plan update adopted in 2011, there were "changes to the Industrial policies ... to clarify and update the descriptions of the industrial future land use categories consistent with current industry trends."²⁰ This included Future Land Use Element Policy 4.3.1, added to the Comprehensive Plan in 2011, to provide for location within Transit Oriented Developments or Activity Centers in the Urban Cluster of "Certain office and light industrial uses, such as research and development and experimental laboratories or the manufacturing or fabrication of products that have minimal off-site impacts..." This adds to the potential for location of new Industrial uses above and beyond the 1,907 acres designated specifically for industrial uses on the County's Future Land Use map (including the Eastside Activity center located around State Road 20 and SE 43rd Street in the Urban Cluster, and 7,690 acres designated in municipal comprehensive plans (such as the undeveloped Business Industrial Park near Gainesville Regional Airport designated in the City of Gainesville's Comprehensive Plan. There are 448 acres designated for Industrial use, of which 368 acres is undeveloped, in Hawthorne).

²⁰ EAR-Based Comprehensive Plan Update Data and Analysis-Future Land Use Element for Board of County Commissioners Adoption Hearing April 5, 2011 pp.5-7

Staff evaluated the application as it relates to the Comprehensive Plan Objective 8.5 *Plan East Gainesville* and subsequent policies. Plan East Gainesville is a comprehensive economic revitalization plan for the eastern urban areas of Gainesville and Alachua County. The Plan, originally developed in the early 2000s, was a cooperative effort of the Metropolitan Transportation Planning Organization (MTPO), Alachua County, and the City of Gainesville that involved widespread public participation and input over the course of a few years. The planning process resulted in a special area plan for East Gainesville which balanced land development, environmental protection, and improved transportation mobility.

The Plan East Gainesville study area includes about 21,000 acres in unincorporated Alachua County and the City of Gainesville. The study area is generally bounded by the Gainesville Regional Airport on the north, Newnan's Lake on the East, Paynes Prairie on the south, and downtown Gainesville on the west. The University of Florida, Shands, and VA employment centers are also considered part of the study area as they relate to East Gainesville, primarily through transportation systems and access to employment. The County's Comprehensive Plan also identifies a bus rapid transit route connecting the Eastside Activity Center with existing employment centers in Gainesville. The portion of the proposed sector plan that is to be designated as mixed-use and where the jobs will be located is located five miles east of the eastern boundary of the Eastside Activity Center.

The Plan East Gainesville Master Plan map and policies relating to the unincorporated area initiatives were adopted as part of the Alachua County Comprehensive Plan in 2006. Several of these Plan East Gainesville initiatives have been completed or are currently underway. An update of the Eastside Activity Center Plan was completed in 2009 for the area located north of the intersection of Hawthorne Road (State Road 20) and SE 43rd Street, and surrounding Eastside High School. The Eastside Activity Center Plan provides a policy framework to encourage the development of this area as a mixed use activity center for the eastern part of the Urban Cluster, including higher density residential, commercial, and employment-based land uses.

Affordable housing is another component to consider as part of Future Land Use Element Policy 7.1.3(d) (2). Affordable housing has not been proposed in the Envision Alachua Sector Plan. Proposed **EASP Policy 10.2.6.4** does state "Residential development within the EA-EOMU shall provide a range of residential options that expands the housing choices for existing and future residents of Alachua County,... and to provide for a greater range of choices of housing types in single-family residential areas, affordable housing, and the promotion of infill to new and existing neighborhoods while maintaining single family character, one accessory dwelling unit shall be allowed on single family residential lots." These proposed policies do not ensure the provision of affordable housing in this proposed development that would have the population size of all municipalities in the County added together except Gainesville. Adopted Housing Element Policy 1.1.4 states that *'It is and shall be the policy of the Board of County*

Commissioners to promote the dispersion of newly built affordable housing units within developments throughout the entire County. This should include areas which are proximate to schools, shopping, employment centers, daycare facilities and transit corridors.' If this proposed amendment would eventually be reviewed as a Development of Regional Impact (DRI), an analysis of affordable housing in the area would be required and, if found lacking, affordable housing would have to be provided by the developer. Sector Plans are, however, exempt from the DRI statutes. While affordable housing is not addressed in the sector plan statute, it is County policy to ensure that affordable housing is dispersed throughout the community (Housing Element Policy 1.1.4) and policies could be created to ensure that some of the proposed housing would be affordable. According to the proposed application, a range of jobs would be provided, including those at or near minimum wage. Absent a specific provision for affordable housing in this new development, future affordable housing is likely to continue to be concentrated in areas such as East Gainesville and Hawthorne.

Plum Creek's proposed EA-EOMU designated property is located approximately four miles outside of the closest Urban Cluster boundary and is separated from the cluster by Newnan's Lake. Provision of significant urban infrastructure and services into the rural area could provide an incentive for further sprawl on adjacent properties in these areas creating even more expansive inefficient and expensive provision of services. Further analysis is included in Section VI Public Facilities and Services.

FLUE Policy 7.1.3(d)(4) considers access to the regional transportation network and multi-modal transportation systems. Plum Creek's proposed EA-EOMU properties are located on State Road 20 and along US 301. There is currently no multi-modal transportation system serving the area. The Alachua County Mobility Plan has planned for a network of multi-modal transportation systems serving the urban area within the Urban Cluster. Effective delivery of enhanced transit, bicycle and other modes of transportation is typically associated with dense mixed-use development. The subject property is also isolated from existing Urban Cluster connections to existing bicycle/pedestrian facilities. The distance between the two proposed development nodes and to the nearest municipalities makes the provision of transit with reasonable headways very inefficient. Further analysis is included in Section V Transportation Analysis.

FLUE Policy 7.1.3(d)(5) requires an analysis of conservation and preservation land uses when evaluating appropriate locations to expand the urban cluster. Adopted Policy 3.1.1 of the Conservation and Open Space Element (COSE) states *Conservation Areas shall consist of natural resources that, because of their ecological value, uniqueness and particular sensitivity to development require stringent protective measures to protect their ecological integrity.* Strategic Ecosystems (Conservation and Open Space Element Objective 4.10 and Policies 4.10.1-4.10.8) are one of these conservation areas that are so designated because of their native biodiversity, ecological integrity, rarity, functional connectedness, documented listed species, high vegetation quality, or species diversity. The proposed EA-EOMU areas are almost entirely

within Strategic Ecosystems and contain almost every resource on the conservation area list: wetlands, surface waters, 100-year floodplains, and listed species habitat. The proposed natural resource policies in this application remove County authority to regulate wetlands in the areas proposed for the most intense development. Proposed **EASP Policy 10.4.2.1** states, in part, that “In no event shall the filling of wetlands exceed a total of 400 acres within the entire EASP without approval of the County.” While this is a cap, it’s a large cap and can be exceeded with County approval. Once the Comprehensive Plan is amended and development has begun, it becomes much more difficult to not allow impacts to more wetlands. This cap is in addition to the potential impacts to wetlands in the area recently annexed into Hawthorne, which contains approximately 448 acres of wetlands and, as proposed, has no limit on what can be filled or otherwise impacted.

Proposed **EASP General Strategy 4**, discussed previously, has as a component protecting and retaining regionally significant lands for conservation, habitat protection and wildlife connectivity. However, the proposed policies to meet this component of the strategy only require protection of state recognized regionally significant conservation lands and not those that are recognized as significant to Alachua County. Proposed **EASP Policy 10.0.1.2** states that “Conservation Lands were identified in locations that would protect valuable natural resources, particularly those that support the long term economic and environmental objectives of Alachua County” and then lists a set of criteria for identifying the conservation lands. The proposed future land use map for the EASP does not appear to follow these criteria. More specifically, following these specific criteria in the current policy, listed below, should have resulted in more aggressive conservation land allocation in the areas around Lochloosa Creek and east of Newnan’s Lake.

Conservation and Open Space Policy 3.1.1

Conservation areas shall consist of natural resources that, because of their ecological value, uniqueness and particular sensitivity to development activities, require stringent protective measures to sustain their ecological integrity. These areas shall include:

- (a) Wetlands;*
- (b) Surface waters;*
- (c) 100-year floodplains;*
- (d) Listed species habitat;*
- (e) Significant geologic features; and*
- (f) Strategic ecosystems*

The criteria listed in Conservation and Open Space Element Policy 3.1.1 for determining what is a conservation resource is not the same as the method proposed by the applicant and these two different methods of identifying lands to be considered conservation lands are potentially conflicting. They create two different objectives for identifying such lands without data to support the different identification in Envision Alachua lands versus similarly situated properties outside of the Sector Plan. The proposed area for urban land uses (Envision Alachua Employment Oriented Mixed Use area) also has a list of criteria of how they were located, one of which is “land suitability for concentrated, mixed-use economic development” (proposed **EASP Policy 10.0.3**). Data was not presented to support this proposed language. For example, the SR 20 Job Center on the proposed land use maps is the area that will have the most compact, mixed-use area within the Employment Oriented Mixed Use category that covers approximately 5,555 acres. This location is also the area with the most wetlands and flood plains of all the areas within the EOMU.

The applicant has proposed natural resource protection policies that vary from the policies in the current Comprehensive Plan. Proposed **EASP Policies 10.3.3.4 and 10.3.4.4** allow “...limited impacts to natural systems and wetlands...to the extent authorized by state and federal permits”. The policies state that “Wetlands are defined by as those areas regulated as jurisdictional wetlands by the State of Florida...” Staff notes that state and federal methodologies for identifying jurisdictional extent differ. Proposed **EASP Policy 10.4.2.1** limits the overall wetland filling to 400 acres without additional County approval. Proposed EASP policies 10.3.3.4 and 10.3.4.4 also reference mitigation and state that wetlands and any required mitigation will be through compliance with state and federal environmental permitting requirements. How will federal permitting requirements be complied with if only those wetlands considered jurisdictional by the State of Florida are considered? In addition, the policies state that development within the 100-year floodplain will be permitted provided there is no adverse impact as measured by an increase in peak stage or discharge outside of the EASP boundary. There is no data and analysis or any known justification that would support adopting policies with differing standards for resource protection.

The stated intent of proposed **EASP Objective 10.4.1** Natural Resource Protection (General) is to protect large-scale conservation areas that reinforce regional and state-wide wildlife corridor and habitat linkages. This objective does not contemplate protection of local resources and conservation areas including strategic ecosystems.

The County’s Comprehensive Plan protects the diverse range of natural resources, and therefore Alachua County residents, by protecting air and water quality and species diversity, and it identifies six primary conservation areas and methods for protection, including wetlands, surface waters, 100-year floodplains, listed species habitat, and strategic ecosystems. Critical Ecological Corridors are mapped and protected through a range of tools including regulation, acquisition, and intergovernmental coordination to maintain critical habitat connections within

the County and the region. The EASP site contains significant natural resources and is a critical area for both regionally and locally significant natural resources and ecosystems. The data and analysis provided to support the proposed amendments fails to adequately address potentially significant impacts to wetlands, floodplains, impaired water bodies, the Lochloosa Creek Headwaters Flatwoods Strategic Ecosystem, wildlife habitat and wildlife corridors. The proposed amendment has not included data and analysis that would support diverging from the current natural resource protections in the County as analyzed in Section IV Environmental Analysis section of this report. There is also an issue of the equity of applying different resource protection standards to similarly situated properties without data to support the application of those different standards.

Planned recreation, open space and greenway systems are also to be considered when evaluating the location of an urban cluster expansion (FLUE Policy 7.1.3(d)(6)). The County currently does not have planned public recreation within the EASP. The application contains a public facilities needs analysis that looks at recreation levels of service county-wide. The County's recreation master plan did not consider a potential population of 19,140 residents (*Public Facilities Analysis: Envision Alachua Sector Plan/Comprehensive Plan Amendment, June 22, 2015, CHW*) in this rural area of the County and, therefore, though the acreage of provided recreation may still meet levels of service, those recreation facilities may be 10 miles from the proposed development. Proposed **EASP Policy 10.5.5.2** includes \$100,000 to fund a recreation master plan for the SR 20 Job Center to accommodate the need through 2030. As discussed in the Public Facilities and Services Analysis section of this staff report (section II), the County has adopted Recreation Element Policy 1.1.2 that states, in part, *The County shall adopt and maintain, at a minimum, the following level of service standards for recreation: (1) 0.5 acres of improved activity-based recreation sites per 1000 persons in the unincorporated area of Alachua County; 92) 5.0 acres of improved resource-based recreation sites per 1000 persons in the unincorporated area of Alachua County. The level of service standards shall consider the location of the site and the population within the service areas for the park types, as set forth in Table 1 of this Element* (Recreation Element Table 1 is included in Appendix 5 of this report). This table, titled *Recreation Site Classification for Alachua County*, lists types of parks needed based on location, size and population. This table could be used by Plum Creek to plan for recreation needs at this stage.

C. Conclusion of Land Use Analysis

One of the fundamental land use strategies of the Alachua County Comprehensive Plan is to direct future urban development to locate within the Urban Cluster to maximize efficient use of land, separate urban and rural areas, and protect agricultural areas and natural resources.

While Section 163.3245(3) (a) 7, F.S., states that an applicant for a sector plan is not required to demonstrate need, the applicant has chosen to do so as relates to the industrial land use. Since

the applicant has chosen to supply data and analysis on the need for industrial land in the County, staff has analyzed this assumption (Appendix 3). Staff's analysis concludes that there are approximately 4,500 acres of undeveloped industrial land in Alachua County, including the unincorporated area and all of the municipalities. Approximately 962 acres of this undeveloped industrial land are located in the unincorporated area. Most of these lands are strategically located proximate to existing urban areas and population centers, where infrastructure and public services are generally available to serve new development. The applicant, though using data and analysis to attempt to demonstrate a need for additional industrial lands in the County, has not analyzed adopted Comprehensive Plan Policy 7.1.3 as it relates to reallocating land within the Urban Cluster or within incorporated municipalities to address a need prior to considering an expansion of the Urban Cluster.

Adoption of the Envision Alachua Sector Plan would provide for intense residential, commercial and industrial uses well outside of the Urban Cluster in an environmentally sensitive area lacking urban infrastructure and services. This is not a fiscally sound approach to development planning. The proposed Envision Alachua Sector Plan amendment would not meet the County's adopted vision for efficient development that conserves natural resources while providing economic opportunity and growth potential.

IV. Environmental Analysis

A. Summary of Environmental Analysis

The revised 2015 Envision Alachua Sector Plan comprehensive plan amendment application involves approximately 52,745 acres of land located in eastern Alachua County and includes map and text amendments to the Alachua County Comprehensive Plan. The EASP contains lands owned and managed by the Plum Creek Timber Company, Inc. (Plum Creek) as of June, 2015.

In terms of size and scope, Plum Creek's EASP proposal is the largest Comprehensive Plan amendment Alachua County has ever received from a private applicant. In evaluating such a large-scale proposal, staff has summarized the significant environmental issues related to the EASP in the comments below. The complete text of all referenced Alachua County Comprehensive Plan policies can be found in Appendix 4.

In evaluating Plum Creek's application, staff has identified several major environmental concerns/issues. In summary, the proposed comprehensive plan amendments would result in:

- Significantly higher residential development than current Comprehensive Plan allows;
- Millions of square feet of non-residential development not currently allowed by the Comprehensive Plan;
- Demand for significant amounts of water and creation of a significant amount of wastewater and stormwater;
- Development in areas that contain significant expanses of floodplains and wetlands with policies that include removing County protection standards for highest use areas;
- Establishment of different protection standards for the same resources in different development areas within the EASP;
- Urban development on lands containing mostly poorly drained soils with high water tables;
- Urban development within the Orange Creek Basin Management Action Plan area and impaired watersheds of Newnan's and Lochloosa Lakes;
- Extensive urban development in a strategic ecosystem (County-recognized conservation resource);
- Intense urban uses within the heart of the County's Critical Ecological Corridor area and Priority 3 area of the Florida Ecological Greenways Network;
- Inadequate corridor design and safeguards to maintain regionally significant wildlife corridor;
- Long-term disruption to the local hydrology and water resources

The remaining text in this section will discuss these issues in more detail.

The EASP comprehensive plan amendments, if adopted by the County Commission, would replace or supersede many existing Comprehensive Plan environmental objectives and policies with new objectives and policies. Affected environmental objectives and policies include:

- COSE (Conservation & Open Space Element) Obj. 3.1 (Conservation Land Use Categories) and all associated policies (3.1.1 – 3.1.5)
- COSE Policy 3.2.1 (Preservation Land Use)
- COSE Obj. 3.6 (Resource Protection Standards) and associated policies (3.6.1, 3.6.3 – 3.6.15). Policy 3.6.8 is restated and slightly reworded in the application as **EASP Policy 10.4.1.3**.
- COSE Obj. 4.7 (Wetland Ecosystems) and all associated policies (4.7.1 – 4.7.12) for specific portions of the EASP area.
- COSE Obj. 4.8 (Floodplain and Floodways) and all associated policies (4.8.1 – 4.8.9)
- COSE Obj. 4.10 (Strategic Ecosystems) and all associated policies (4.10.1 – 4.10.8)

B. Suitability Analysis

This section of the report analyzes environmental parameters within the area for the proposed amendment, with specific information regarding conservation resources and the environmental suitability of proposed uses within the EASP area (Future Land Use Element Policy 7.1.3 d). For the purposes of this section, most of the analysis focuses on the area of the Envision Alachua Sector Plan that is proposed for the Employment Oriented Mixed Use (EA-EOMU) land use designation because the proposed development in this land use would have the greatest environmental impact of all the proposed land uses.

1. Floodplains

Existing County Comprehensive Plan policy (COSE Policy 3.1.1) recognizes 100-year floodplains as conservation resources which should be avoided by development. The applicant is proposing to locate their most intense development in the SR 20 Job Center (34.9% floodplain area) and the US 301 Job Center (24% flood plain area), which would necessitate development within floodplains.

Proposed **EASP Policy 10.3.3.4.d** for the SR 20 Job Center would allow development within the floodplain: *“...Development within the 100-year floodplain shall be permitted to the extent that it does not result in adverse impacts as measured by an increase in peak stage or discharge outside of the EASP boundary. Compensating storage areas may be utilized on an EASP-wide basis to mitigate the potential for adverse impacts that could occur as a result of an increase in peak stage or discharge outside of the EASP boundary.”* The same language is included in proposed **EASP Policy 10.3.4.4.d** for the US 301 Job Center. There is a concern about the interaction of floodplains within DSAPs and within EA-EOMU SR20 and US301 Job Centers as

these are within the EASP boundaries and the policies are pertaining to no increase in peak stage or discharge outside of the EASP boundary.

These policies would allow development in floodplains, which is not consistent with the County's current designation of 100-year floodplains as conservation resources. COSE Policy 3.6.4 states that *"The County shall prohibit subdivision of land after January 21, 1993 that would create new lots lacking sufficient buildable area, as defined by setback requirements and other development standards, outside of conservation areas."* Existing County policies are intended to prevent the creation of unsuitable lots, to minimize risk of flood damage to property, and prevent impacts to conservation resources. The proposed language, if adopted, would exclude all of the EA-EOMU Land Use area from current 100-year floodplain protection standards.

There are no compelling or reasonable rationales offered to justify exempting proposed development in these areas from current County floodplain protection policies (as well as wetland policies, which is addressed in following sections).

In addition, it is unclear how the applicant will comply with compensatory storage requirements. Natural wetlands and floodplains should be avoided, but the applicant is not showing that this will be the case, nor is the applicant providing any policies that direct development away from these flood prone areas. Based on the intensity of proposed uses, a significant amount of floodplain resources will be impacted. The language also states that 'compensating storage' would be allowed within or adjacent to EA-EOMU except in EA-PRES areas. Proposed **EASP Policy 10.2.4(d)** specifically allows stormwater management in the EA-CON land use area. Our current policies COSE 4.7.10, 4.6.17 and 3.1.2 (c) allow stormwater discharges into conservation areas including wetlands only if the natural function of the system will be maintained and that water quality, and biological health including vegetation and aquatic lifeforms will be maintained or improved. In addition, the owner of any such stormwater project must implement a maintenance and monitoring plan and post a performance bond or similar financial guarantee to assure implementation of the maintenance and monitoring plan. There are no policies proposed to ensure consistency with this requirement.

Proposed **EASP Policy 10.2.3.i** states that the Alachua County provisions for wetlands and floodplain will apply to the EA-PRES land use areas, except for the roadway crossings. Proposed **EASP Policy 10.2.3 (ii)** – Road crossings will comply with state and federal permitting requirements. It is unclear why County provisions would not apply to road crossings, especially in the Lochloosa Creek area. The crossings (proposed or existing logging roads) would need to be evaluated to meet the 'no rise' criteria. Roads should be raised at or above the base flood level as stated in our current Comprehensive Plan and ULDC.

Proposed **EASP Policy 10.3.3.3 a. (2)** states that Active Recreation uses are permitted to occur within the 100 year Floodplain. Active recreation is not defined. The only recreation that should be allowed within floodplains would be pervious, open field type recreation uses.

Proposed **EASP Policy 10.6.9 DSAP Stormwater** states that at DSAP the stormwater facilities will be master planned and that stormwater facilities will be required to be developed in a park-like manner and requires use of various Low Impact Development techniques. This policy should also discuss the locations of basins with respect to Conservation areas (EA-CON), Preservation areas (EA-PRES), floodplains, wetlands, floodways, creeks and other natural resources.

On page 9 of the Pegasus memorandum it is mentioned that the County only allows compensation storage within stormwater ponds. This is not a true statement as the County has permitted compensation storage outside of stormwater basins as long as they are hydraulically connected to the impacted flood plain. This also supports that a base flood elevation needs to be established in conjunction with the initial master plan for stormwater for all unnumbered 'A' zones in order to calculate the compensation storage volumes.

2. Community Rating System (CRS)

Alachua County has been a participant in the National Flood Insurance Program (NFIP) Community Rating System (CRS) since 1995. The National Flood Insurance Program's Community Rating System is a voluntary incentive program that recognizes and encourages community floodplain management activities that exceed the minimum NFIP requirements. As a result of Alachua County's flood insurance classification, flood insurance premium rates for Alachua County citizens and businesses are discounted to reflect the reduced flood risk from meeting the three goals of the CRS:

1. Reduce flood damage to insurable property;
2. Strengthen and support the insurance aspects of the NFIP, and
3. Encourage a comprehensive approach to floodplain management.

Alachua County currently holds a CRS Classification of 6, which enables residents and businesses in unincorporated Alachua County that carry flood insurance and are located in a Special Flood Hazard Area to receive a 20% discount on their insurance premiums (residents outside of a Special Flood Hazard Area who carry flood insurance receive a 10% discount to their premiums).

The CRS program incentivizes local communities to reduce their flood risk by having programs that avoid development in the floodplain, avoid floodways, provide buffers etc. that protect floodplains. The overall goal of these programs is to reduce flooding risk by discouraging development in floodplains and building habitable structures that are higher than the 100-year

floodplain. For development areas of the proposed Envision Alachua Sector Plan where the ground water table is generally very high, avoidance is a key to protect the natural areas and reduce the risk of flooding. The proposed EASP policies seek to control peak stage or discharge outside of the EASP boundary but do not specify requirements inside the EASP boundary. Analysis of the peak stage inside the EASP boundary is critical as the buildings proposed (8,700 homes and the 11.2 million square feet non-residential uses) and their related infrastructure (roads, etc.) have to be above the 100-year floodplain level to minimize flooding risk. The proposed EASP policies, if adopted, may result in a downgrading of the County's CRS Rating, which will in turn affect the insurance discount rate that County residents and businesses currently enjoy.

Section 163.3177(f), Fl. St., requires that comprehensive plan amendments be based on appropriate data and analysis. The applicant has briefly attempted to address this in the data and analysis submitted as Technical Memorandum Stormwater Management – Envision Alachua Sector Plan dated May 1, 2015. There are several missing elements in this memorandum including providing activities related to water quality, improvements, Basin Management Action Plans, and erosion and sedimentation control. As these elements are missing from the data and analysis, they are also not included as proposed policies.

No data and analysis was provided to support treating certain areas of the EASP differently from others with regards to floodplain protection, other than that the development envisioned in this application cannot be constructed without building in the floodplains. Comprehensive plan policies must react to the data and analysis in an appropriate way and to the extent necessary, Section 163.3177(f), Fl. St. The applicant has not proposed specific policies to protect and maintain the natural functions of the floodplains, floodways and all other natural areas having hydrological characteristics of the 100-year floodplain. The proposed EASP policies fail to address key components of the existing Comprehensive Plan (which is supported by data and analysis) and lack elements to address CRS requirements such as watershed management, watershed planning, development of specific standards in areas of special flood hazard, connectivity of floodways, and provision of buffers within the special flood hazard areas.

In addition, in the data submitted to support the application is a case study provided in the CHW Memorandum Envision Alachua Sector Plan – Stormwater Management Design and Floodplain Encroachment dated June 1, 2015 that show that due to the high groundwater table expected in Plum Creek areas the developed area will possibly be raised three to five feet and a combination of dry and wet stormwater basins will be used. The example showed that the net FEMA floodplain area would be reduced and the storage-volume would increase. The effect of reduction in net floodplain area could adversely affect the County's CRS rating. No policies have been proposed to address this issue.

3. Wetlands

According to the applicant's analysis of SJRWMD land use/land cover data maps, the entire EASP area (52,745 acres) contains approximately 17,200 acres of wetlands and surface waters (33% of land area). Approximately 1,379 acres of wetlands exist within the 5,555 acres of the urban land use (EA-EOMU) designated in the proposed plan amendment (see Table 3), or about 25% of the land area within EA-EOMU. However, within the area identified for most intense development, Area A, wetlands comprise approximately 31% of the land area (see Table 3).

TABLE 3. WETLAND AND UPLAND ACREAGES, PERCENTAGES, BY SUBAREAS (BASED ON DATA PROVIDED BY APPLICANT)

Development Area	Total Acreage	Estimated Wetlands	Uplands	% wetlands
SR 20 Job Center* (EA-EOMU)	2,540	779	1761	31%
US 301 Job Center (EA-EOMU)	3,015	600	2,415	20%
EA-RUR	1,961	469	1,492	24%
Total (EA-EOMU)	5,555	1,379	4,176	25%

*SR 20 Job Center wetlands were delineated by BDA and a portion has been verified on-site by County-contracted environmental consultants (ECT) (using wetland delineation methodology in 62-340 F.A.C.). The results of this verification and BDA response are provided in the Appendix 6. The estimated wetlands acres for US 301 Job Center and EA-RUR are based on a composite of mapped resources. These resources include: SJRWMD Land Use/Land Cover 2009 (hydric components), National Wetlands Inventory, National Hydrography Dataset, Alachua County Soil Survey (hydric components)

Proposed **EASP Policy 10.4.2.1** would apply the provisions of the Alachua County Comprehensive Plan and associated Land Development Regulations relating to wetland protection for the EA-RUR and EA-CON.

By contrast, proposed **EASP Policies 10.3.3.4** and **10.3.4.4** would remove the County's authority to determine if wetland impacts are appropriate (COSE Policies 4.7.1, 4.7.4, & 4.7.7) within EA-EOMU SR-20 Job Center Area, US301 Job Center Area, and EA-PRES where road crossings are proposed. Wetlands will be protected only through compliance with state and federal environmental permitting requirements. Map 7 shows the areas that will not be subject to County wetland protection standards or that will be partially not subject to County regulations under the proposed EASP policies.

State and Federal environmental permitting rules are, in certain ways, less effective at requiring avoidance and minimization of impacts to wetlands. State agencies, for example, must consider mitigation proposals from an applicant at the same time the agency is negotiating avoidance and minimization²¹ (Sec. 10.2.1 & Sec. 10.3, Applicant's Handbook, which is a

²¹ Environmental Resource Permit Applicant's Handbook Volume 1 (General and Environment). All Appendices, except A, B, D and E, are incorporated by reference in subsection 62-330.010(4), Florida Administrative Code. Effective October 1, 2013.

regulatory publication used by FDEP and the Water Management Districts in implementing the Environmental Resource Permitting Rule (62-330, F.A.C.)). The County appropriately separates these considerations to ensure practicable alternatives to permitting impacts are fully explored prior to entertaining proposals for mitigation of unavoidable impacts. Even in a case where the County Commission determines that impacts to wetlands are unavoidable and compensatory mitigation efforts are appropriate, existing Comprehensive Plan policy limits the magnitude of impacts that may be approved by the Board (COSE Policy 4.7.4). State and Federal agency approvals are subject to no such limitations. Further, State agencies cannot require avoidance and minimization if the *“applicant proposes mitigation that implements all or part of a plan that provides regional ecological value...”* (*supra* 21, Sec. 10.2.1.2). Under this provision, mitigation might not occur within the same project, the same local drainage basin, or even the same county. In addition, State rules provide less protection to isolated wetlands under one half acre in area (*supra* 21, Sec. 10.2.2.1). Federal rules do not provide protection to all wetlands.

The proposed plan amendment does estimate or establish how many wetlands are intended to be impacted, limiting direct impacts to 400 acres of wetlands without County approval, demonstrating that wetland impacts would not be avoided or minimized.

The applicant states that to be able to build compact development at the SR 20 and US 301 Job Centers, approximately 400 acres of wetlands would need to be impacted. The applicant goes on to state that without creating contiguous development areas of sufficient scale, which will require select filling of wetlands, the SR 20 and US 301 Job Centers will fail to reach their potential as economic progress engines for Alachua County. Based on their land use data and analysis (June 2015), the SR 20 Job Center conceptual land use scenario would require filling approximately 250 acres of wetlands to allow for higher density development form in the mixed use center and road crossings. The US 301 Job Center conceptual land use scenario would require an estimated 150 acres of filled wetlands. In combination, the impacts would result in a minimum of 400 acres of filled wetlands. Although staff recognizes the benefits of a compact development design, in staff’s opinion the need to destroy 400 acres to accommodate two 300-to-500-acre contiguous developed areas demonstrates how these area are not suitable for such urban uses. The policy states that no more than 400 acres may be impacted without County approval. This means that the first 400 acres may be impacted without any other County approval than this Comprehensive Plan amendment language and additional acres may be impacted if given County approval at a further stage such as DSAP or development plan approval.

The applicant (Land Use Data & Analysis: Addendum, June 2015) identifies three primary purposes for filling of non-critical wetlands: (1) to enable the creation of concentrated areas for higher density mixed use development, (2) to ensure connectivity to and between development areas, and (3) to accommodate rail spur access to manufacturing sites. The applicant does not

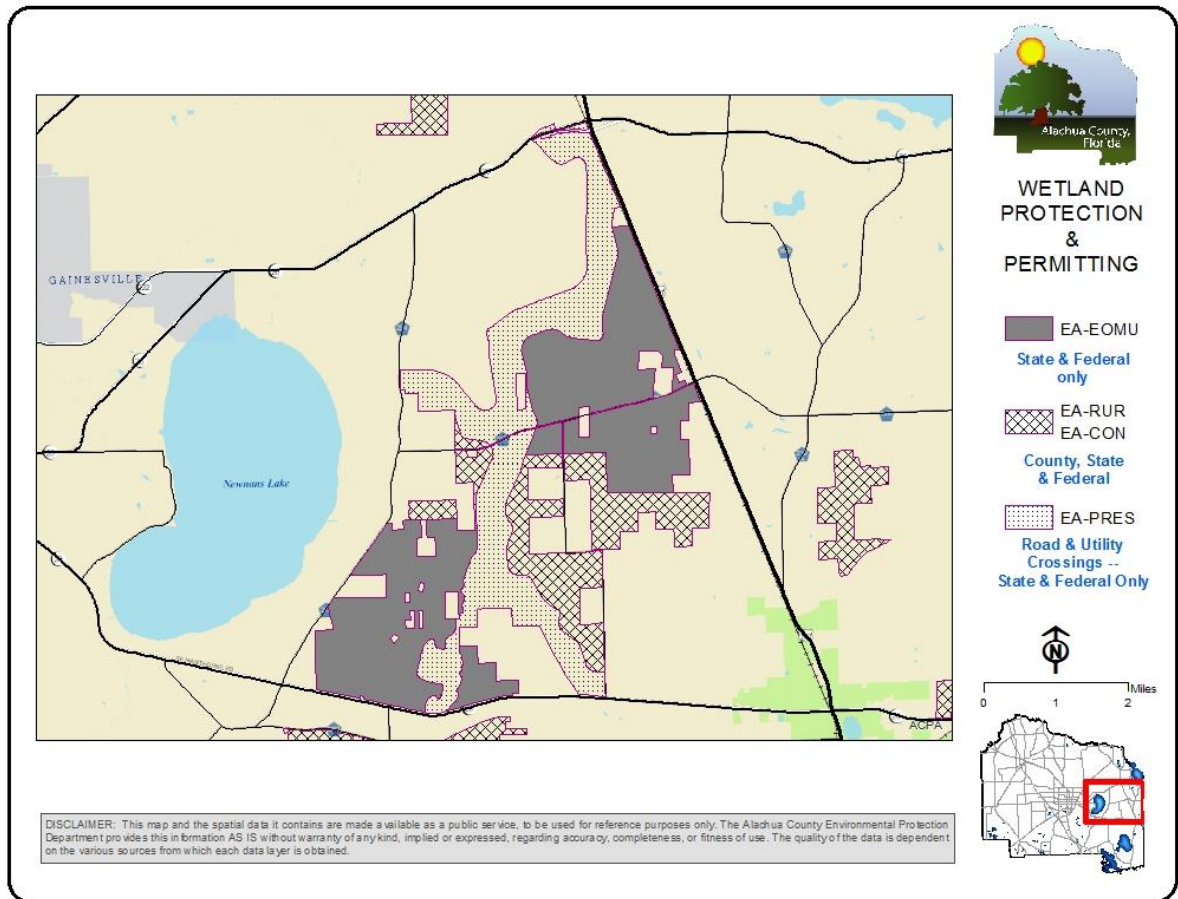
define ‘non-critical’ or provide data and analysis for which wetlands would qualify as ‘non-critical.’

If adopted by the Board, these proposed EASP policies would remove the County Commission’s authority to determine if wetland impacts are appropriate and, if determined to be appropriate, to limit the extent of impacts.

The County’s wetland protection policies and implementing regulations serve a critical role in providing safeguards to maintain our community quality of life, protect water quality, quantity and aquifer recharge, manage stormwater and flooding, conserve habitat, and maintain resilience to future effects of global climate change (*i.e.*, extreme droughts and flooding) in our community.

If implemented, proposed EASP policies would remove these safeguards by yielding local land use decision making authority to State and Federal environmental permitting agencies.

Deficiency in proposed amendments: Sec. 163.3177(f), Fla. Stat., requires that comprehensive plan amendments be based on appropriate data and analysis and that policies adopted react to that data in an appropriate way and to the extent necessary. No data and analysis was provided to support treating certain areas within the EASP differently from other areas within the EASP with regards to wetland protection. No data and analysis was provided to justify treating the EASP lands differently than similarly situated properties outside of the EASP. The proposed EASP wetland policies are not based on data and analysis.



MAP 7: EASP AREAS PROPOSED FOR ONLY FEDERAL AND STATE WETLAND PERMITTING REQUIREMENTS (FOR THE FIRST 400 ACRES OF WETLAND IMPACTS) AND AREAS PARTIALLY PROPOSED FOR FEDERAL AND STATE WETLAND PERMITTING REQUIREMENTS

4. Soils/High Water Tables

The applicant provided data and analysis of the soils within the EASP. The applicant's data and analysis states that the majority of the property (56%) has A/D class soils. Group A soils have a high infiltration rate (low runoff potential) and Group D soils have a very low infiltration rate (high runoff potential). When soils are assigned a dual hydrologic group, as in this case, the first letter applies to the drained condition and the second to the undrained condition. This means that, according to the applicant's data and analysis, the majority of the land within the EASP has low runoff potential when drained and high runoff protection when undrained.

Alachua County Comprehensive Plan COSE Policy 4.2.1 states that the "Characteristics of soil suitability and capability shall be considered in determining appropriate land uses." The policy references the Alachua County Soil Survey prepared by the United States Department of Agriculture Natural Resource Conservation Service (USDA NRCS) as a source for preliminary recommendations concerning soil suitability absent site-specific detailed soil analysis.

According to the Alachua County Soil Survey (USDA NRCS, 1985), the majority of the soils in the EA-EOMU area (5,239 acres of the total 5,555 acres or approximately 94%) consists of somewhat poorly drained to very poorly drained soils (Table 4 and Map 8 and Map 9, below).

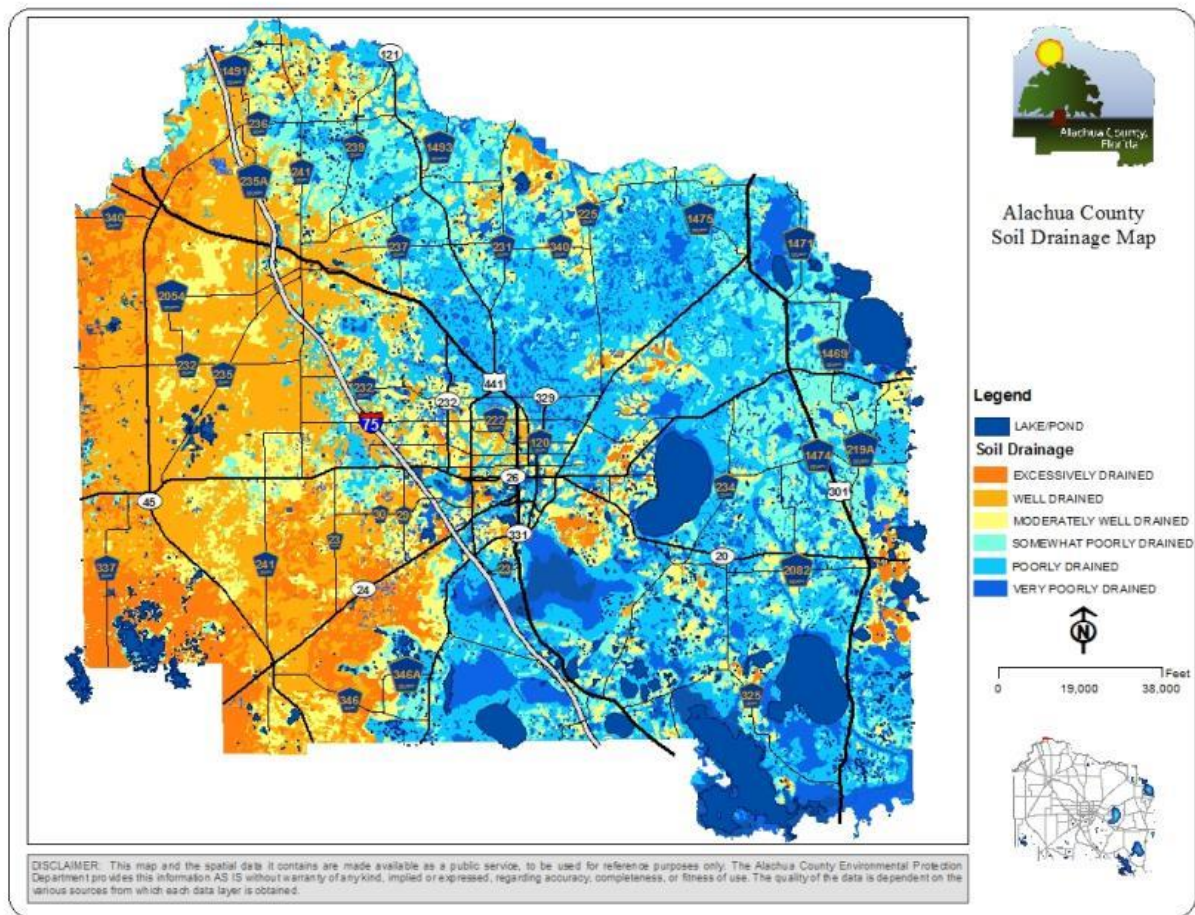
TABLE 4. ACREAGE AND PERCENT OF EACH SOIL DRAINAGE CLASS BY LAND USE TYPE

Development Area	Soil Drainage Class*	Acres	% of Area
SR20 Job Center (EA-EAMU)	Moderately well drained	127.73	5.03%
	Somewhat poorly drained	439.89	17.32%
	Poorly drained	1,421.60	55.99%
	Very poorly drained	548.99	21.62%
	Water	1	0.04%
US301 Job Center (EA-EAMU)	Moderately well drained	187.11	6.21%
	Somewhat poorly drained	1,535.93	50.94%
	Poorly drained	885.99	29.39%
	Very poorly drained	405.98	13.47%
EA-RUR	Excessively drained	0.84	0.04%
	Moderately well drained	187.42	9.58%
	Somewhat poorly drained	1,200.46	61.33%
	Poorly drained	324.63	16.59%
	Very poorly drained	244.01	12.47%
EA-CON	Excessively drained	362.52	0.93%
	Well drained	11.28	0.03%
	Moderately well drained	2,251.76	5.75%
	Somewhat poorly drained	6,482.32	16.54%
	Poorly drained	20,154.73	51.43%
	Very poorly drained	9,927.20	25.33%
EA-PRES	Moderately well drained	99.70	2.82%
	Somewhat poorly drained	843.40	23.84%
	Poorly drained	1,596.19	45.12%
	Very poorly drained	998.67	28.23%

*Data from 1985 United States Department of Agriculture Natural Resources Conservation Service Soils Report for Alachua County (USDA NRCS, 1985)

For example, the most common soil in the SR 20 Job Center, which is the area proposed for the most intense uses, is Pomona sand (Map Unit #14 – USDA NRCS, 1985). This soil type is described as having “*severe limitations for urban uses, including absorption fields for septic tanks, dwellings, commercial buildings...roads and streets.*” The Alachua County Soils Survey²² also states that wetness is the major problem, with the water table often being within 10 inches of the surface for 1 to 3 months during the wet season. According to the Alachua County Soils Survey, the next most common soil in the SR 20 Job Center is Sparr fine sand (Map Unit #50 – *supra* 22) which has moderate to severe limitations for most urban uses (*supra* 22).

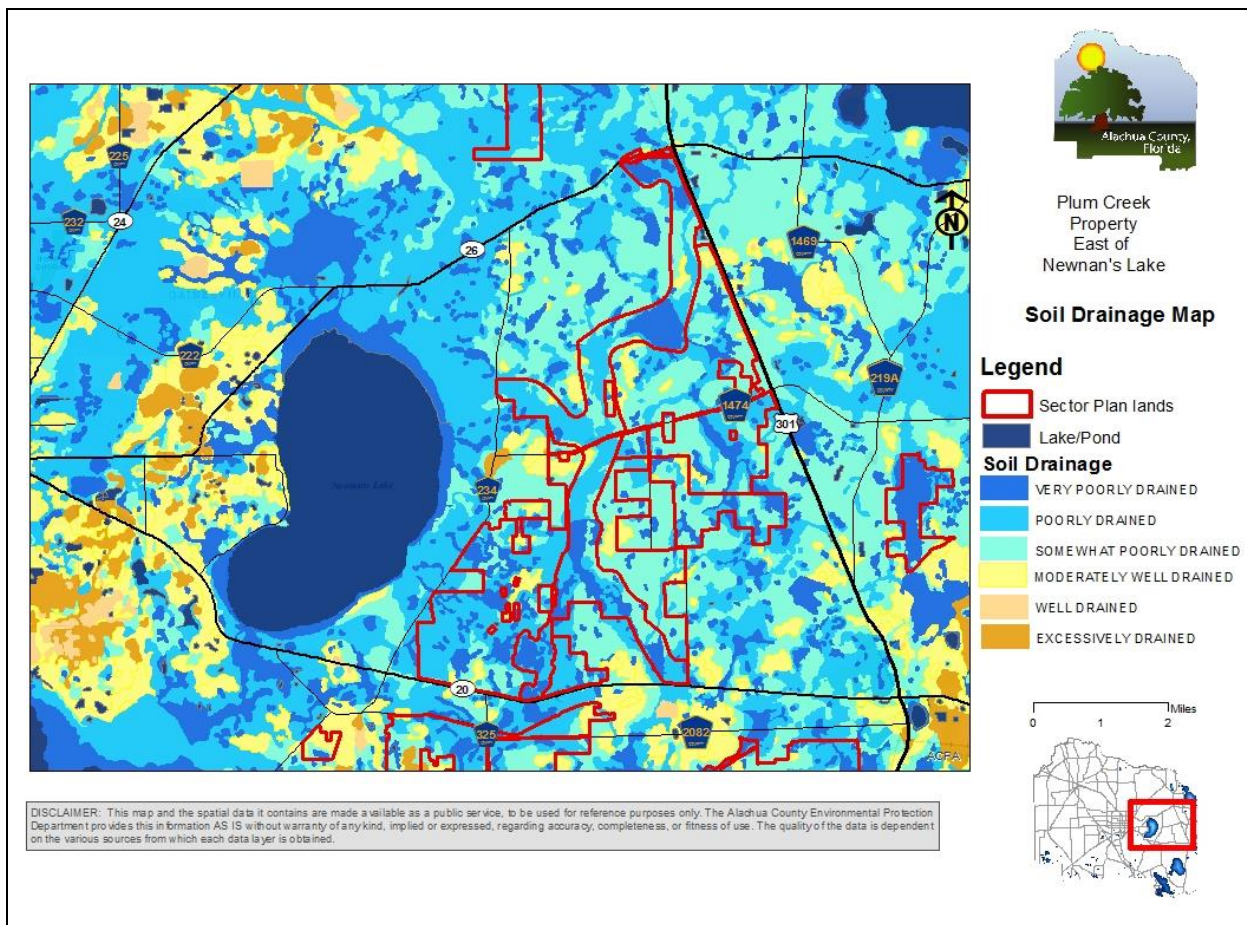
²² USDA NRCS. 1985. Soil Survey of Alachua County, Florida. United States Department of Agriculture, Soil Conservation Service.



MAP 8: SOIL DRAINAGE MAP OF ALACHUA COUNTY

The data and analysis offered by the applicant is not appropriate, as it did not consider the Alachua County Soils Survey. The applicant's proposed EASP policies do not react in an appropriate way to the severe limitations for urban uses exhibited by the majority of soils within the EA-EOMU, as determined by data and analysis conducted by staff. The resubmittal included a Preliminary Geological and Geotechnical Site Evaluation, GSE Engineering & Consulting June 2015, which stated that the groundwater table was typically encountered within three (3) feet of land surface in March 2015. March 2015 was a relatively dry period with below normal average rainfall for both February and March 2015²³. The report concluded that under drains or raised roadway beds would be needed if wet season high groundwater table did not meet state and local requirements for roadway design and that if roadway beds were raised the surrounding developed area, including common area, would typically require fill to provide adequate drainage.

²³ U.S. Climate Data for Gainesville Florida. 2015. Accessed September 4, 2015. <http://www.usclimatedata.com/climate/gainesville/florida/united-states/usfl0163/2015/3>



MAP 9: SOIL DRAINAGE MAP SHOWING THE ENVISION ALACHUA SECTOR PLAN PROPERTIES EAST OF NEWNAN'S LAKE

5. Evapotranspiration, Surface Waters and Surficial Aquifer Water Levels

Poorly drained soils have a high water table that supports surface waters and wetlands and their associated ecosystems. Even what appear to be 'isolated' wetlands are often interconnected just beneath the soil surface by the shallow water table. Evapotranspiration (ET) and direct evaporation from lakes (open water) are two of the primary water losses within the Orange Creek Basin. Evaporative loss from open water can be greater than ET from pine flatwoods. Evaporative losses in the large lakes in the Orange Creek Basin were reportedly equivalent to annual rainfall amounts of approximately 52 inches per year²⁴.

The areas proposed for the most intense development in the EASP have elevated seasonal high water tables. Treatment of stormwater in areas with elevated seasonal high water tables is often achieved by creating large and shallow wet stormwater basins. Development of large stormwater ponds has the potential to negatively impact surface waters and wetlands and contribute to water losses within the Orange Creek Basin in a number of ways. Construction of the pond itself can lower the surficial aquifer water levels. Open water of large stormwater

²⁴ Adkins, M. and D.V. Rao. 1995. A surface water hydrologic reconnaissance: upper Orange Creek Basin, north-central Florida. Technical Publication SJ95-4. St. Johns River Water Management District.

ponds, ditching, and other drainage alterations contributes to evaporative losses and can further decrease surficial aquifer water table levels. Additionally, the use of stormwater ponds for irrigation can lower surficial aquifer system water levels. Reductions in surficial aquifer system water levels result in shorter periods of wetland inundation or saturation, less baseflow for intermittent and perennial streams, negative impacts to in-stream plants and animals, and loss of surface water and wetland ecosystem function. The proposed EASP policies could require a substantial increase in large stormwater basins and drainage facilities that may drastically increase water losses due to evaporation.

Development consistent with the proposed EASP policies would substantially impact the natural character of the area and the water tables. Alachua County COSE Policy 4.2.5 states *“Development shall be designed to include retention of the natural character of seepage slopes and shallow ground water tables that have been demonstrated to be essential to the hydrologic support of associated conservation areas.”*

Deficiencies in the proposed amendments: The applicant has not demonstrated that the proposed intensity and density of an Urban Land Use is appropriate for a property with such extensive poorly drained soils. Sect. 163.3177(f), Fla. Stat., requires that comprehensive plan amendments be based on appropriate data and analysis. No data and analysis were provided to support intensifying the land use of this region, nor any policies to address the severe limitations for urban uses exhibited by the majority of soils within the EA-EOMU. The application did not include appropriate analysis of the concerns related to the surficial aquifer system and high water tables. Comprehensive plan policies must react to the data and analysis in an appropriate way and to the extent necessary, Sec. 163.3177(f), Fla. Stat. The proposed EASP policies do not adequately address the need to protect surficial aquifer system water levels, wetland hydroperiods, and levels/flows in Lochloosa Creek (including its tributaries), wetlands and other creeks within and in proximity to the EASP (as required by COSE Policy 4.2.5).

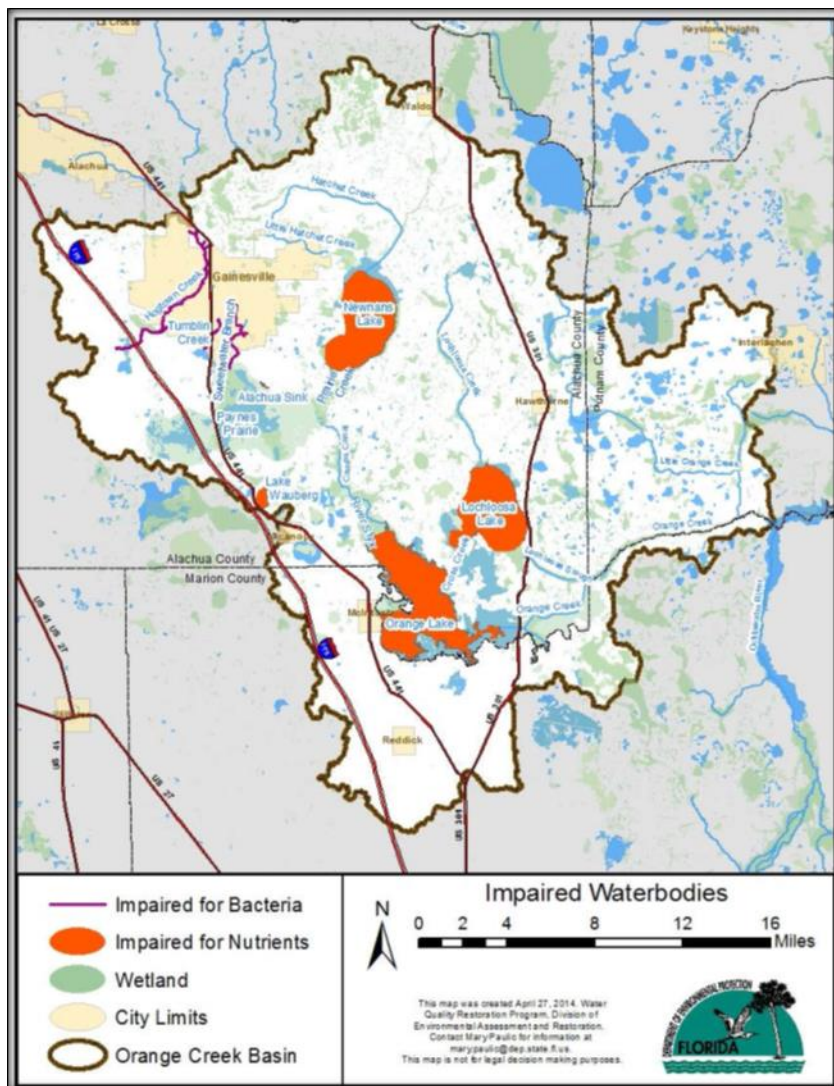
6. Surface Waters and Impaired Water Bodies

The proposed Envision Alachua Sector Plan application proposed that the County Commission amend the Comprehensive Plan to change the current land use designation of Rural/Agriculture over much of the applicant’s property to a more intense land use designation within the 5,555 acre Envision Alachua Employment Oriented Mixed Use (EOMU) areas. Proposed land use changes within the Orange Creek Basin may increase nutrient loading to impaired waterbodies and further impact Lochloosa Lake, an Outstanding Florida Water.

The EASP is located in two major watersheds within the Orange Creek Basin, Lochloosa (encompassing Lochloosa Creek and its downstream receiving water Lochloosa Lake) and Newnan's Lake (Map 10). Newnan's and Lochloosa lakes have been determined by the Florida Department of Environmental Protection (FDEP) to be impaired waters under the Florida Watershed Restoration Act (Section 403.067, F.S.) and the Impaired Surface Waters Rule (Rule 62-303, F.A.C.)²⁵. Both Newnan's Lake and Lochloosa Lake are impaired for nutrients (nitrogen and phosphorus, Figures 3 and 4).

A Total Maximum Daily Load (TMDL) was developed for Newnan's Lake in 2003²⁶ and Lochloosa Lake in 2015²⁷. A TMDL is a calculation of the maximum amount of a pollutant that a waterbody can

receive and still meet water quality standards, and an allocation of that pollutant load among the various sources of that pollutant. A basin management action plan (BMAP) outlining projects for water quality improvement in the Orange Creek Basin was completed in 2007 and



MAP 10: ORANGE CREEK BASIN BOUNDARY AND LOCATION OF BMAP WATERBODIES (FROM FDEP, 2014)

²⁵ Florida Department of Environmental Protection (FDEP). 2008. Orange Creek Basin Management Action Plan. Developed by the Orange Creek Basin Working Group in Cooperation with the Florida Department of Environmental Protection, Division of Water Resource Management, Bureau of Watershed Management, Tallahassee, Florida. May 27, 2008.

²⁶ Gao, X., and D. Gilbert. 2003. Final Nutrient Total Maximum Daily Load for Newnan's Lake, Alachua County, Florida, Tallahassee, Florida. Watershed Assessment Section, Florida Department of Environmental Protection. September 22, 2003.

²⁷ Magley, W. 2015. TMDL Report Lochloosa Lake (WBID 2738A) and Cross Creek (WBID 2754) TMDL for Nutrients and Documentation in Support of Development of Site Specific Numeric Interpretation of the Narrative Nutrient Criteria. Florida Department of Environmental Protection Division of Environmental Assessment and Restoration, Water Quality Evaluation and TMDL Program. March 15, 2015.

adopted in 2008 (*supra* 25). Although a TMDL had not been developed or adopted at that time for Lochloosa Lake, possible management actions to decrease nutrient loading to Lochloosa Lake were included in the 2007 BMAP because of the potential improvement in water quality (in Lochloosa Lake) that could improve water quality downstream in Orange Lake, which has a TMDL for phosphorus (*supra* 25).

The 2007 BMAP recognizes the potential for land use change and the need to minimize effects (*supra* 25). The June 2014 *Final Orange Creek Basin Management Action Plan Phase 2* (Phase 2 BMAP) was adopted by FDEP Secretarial Order, July 11, 2014. The Phase 2 BMAP states that *“Water resources in these watersheds are sensitive and development of the area provides unique challenges.”* and that *“There is the potential for water resources to be impacted by development.”* The EASP has the potential to adversely impact water resources and contribute to water quality impairment.

The resubmittal has no proposed EASP policies related to the extent necessary to the existing and potential water quality impairment issues of Lochloosa Lake. Formerly proposed EASP Policy 10.4.3.5 has been removed, this policy stated that prior to the first Detailed Special Area Plan (DSAP) an analysis will be conducted to identify one or more regionally significant water quality improvement projects that aim to reduce existing watershed impairment of Lochloosa Lake (to provide nutrient reduction below the existing baseline condition). The resubmittal does not address water quality impairment and improvement. Although Lochloosa Creek is stated in the applicant’s Environmental Data and Analysis to be “perhaps the most significant environmental feature of the property that is not under conservation easement,” there is no data and analysis regarding the impact of development on the creek. In Data and Analysis Section 3.7 (Significant Wetlands and Surface Waters) there is no discussion of current water quality or in-stream ecosystem health in Lochloosa Creek (including its tributaries) and other creeks within and surrounding the EASP area. There is also no discussion of current or potential impacts to Newnan’s Lake, Lochloosa Lake, and Orange Lake and their status as impaired waters.

The proposed EASP policies do not adequately address the use of treated wastewater. Use of treated wastewater for environmental restoration can have adverse impacts and can lead to further negative water quality impacts. The resubmittal removed proposed **EASP Policy 10.4.3.4** and added **EASP Policy 10.4.3.3** (Wastewater as a Water Source), which discusses wastewater reuse and groundwater recharge. Wastewater, even if treated to advanced treatment standards with nutrient removal, still contains nitrogen and phosphorus that could adversely impact groundwater and surface water quality. In the Water and Wastewater Data and Analysis Technical Memorandum (Water & Air Research, Inc. and CH2M) it is stated that *...all wastewater within the Plum Creek EASP area will be treated to a minimum of public-reuse standards* and that, *“This will allow the reclaimed water to be used for a variety of needs including industry, rapid infiltration, and irrigation of public area when needed.”* It further states

the constructed wetlands will be used for storage, reuse, and natural treatment recharge through passive infiltration and that *“During extended wet weather periods, Plum Creek will use existing natural wetlands or recharge areas onsite.”* Reclaimed water, including that treated for public reuse, contains nutrients (nitrogen and phosphorus) and may degrade water quality of natural systems and impact downstream or down gradient receiving waters. Reclaimed water must not adversely impact surface water or groundwater by increasing nutrient concentrations (COSE Policy 4.6.16). Wastewater discharging to surface waters and wetlands shall maintain or improve water quality, biological health and natural ecosystem function (COSE Policy 4.6.17 and ULCD Section 406.70 (b)). The Alachua County Code (ULDC Section 406.70 (e)) discourages the use of rapid infiltration basin unless the wastewater treatment process includes enhanced nutrient removal.

Proposed **EASP Policy 10.5.2** (Potable Water and Sanitary Sewer Centralized Services) states that there will be connection to a centralized sanitary sewer system for services by FDEP permitted wastewater treatment plants. Advanced waste treatment with nutrient removal must be specifically addressed in the policies for the protection of groundwater and surface water quality (COSE Policy 4.6.16). Proposed **EASP Policy 10.5.2** could allow package sewage treatment plants (facilities), which are prohibited under Alachua County policy (Potable Water and Sanitary Sewer Element 2.1.6).

Proposed **EASP Policy 10.4.3.3** Package sewage treatment facility effluent has higher nutrient concentrations, potentially making reuse or wetland treatment of reclaimed water a water quality concern. Larger centralized wastewater treatment facilities have higher treatment capabilities, which equates to lower nutrient levels in the reclaimed water.

Deficiencies in proposed amendments:

Sec. 163.3177(f), Fla. Stat., requires that comprehensive plan amendments be based on appropriate data and analysis. Data and analysis were not provided discussing potential impacts to the lakes and their status as impaired waters. Comprehensive plan policies must react to the data and analysis in an appropriate way and to the extent necessary, Sec. 163.3177(f), Fla. Stat. Specific policies were not proposed to protect water quality, in-stream biological communities, and flow in Lochloosa Creek (including its tributaries) and other creeks within and in proximity to the EASP, and to improve, or at a minimum not further degrade, water quality in Newnan’s and Lochloosa lakes.

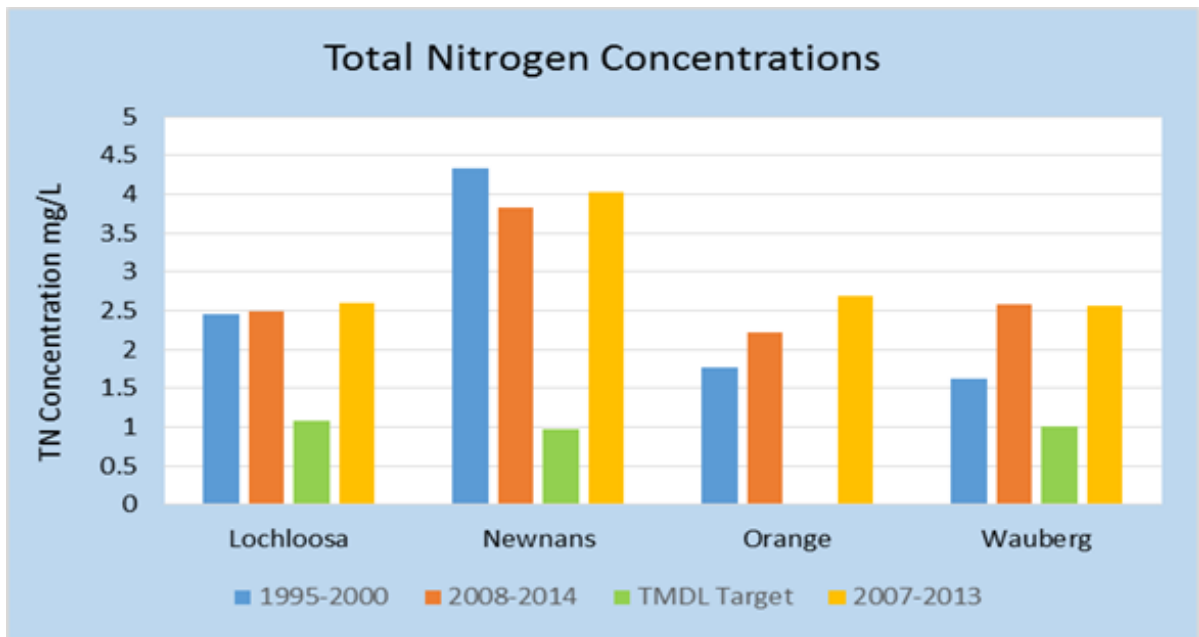


FIGURE 3. COMPARISON OF ANNUAL AVERAGE TN CONCENTRATION BETWEEN THE TMDL DATA PERIOD AND POST-BMAP DATA PERIOD²⁸.

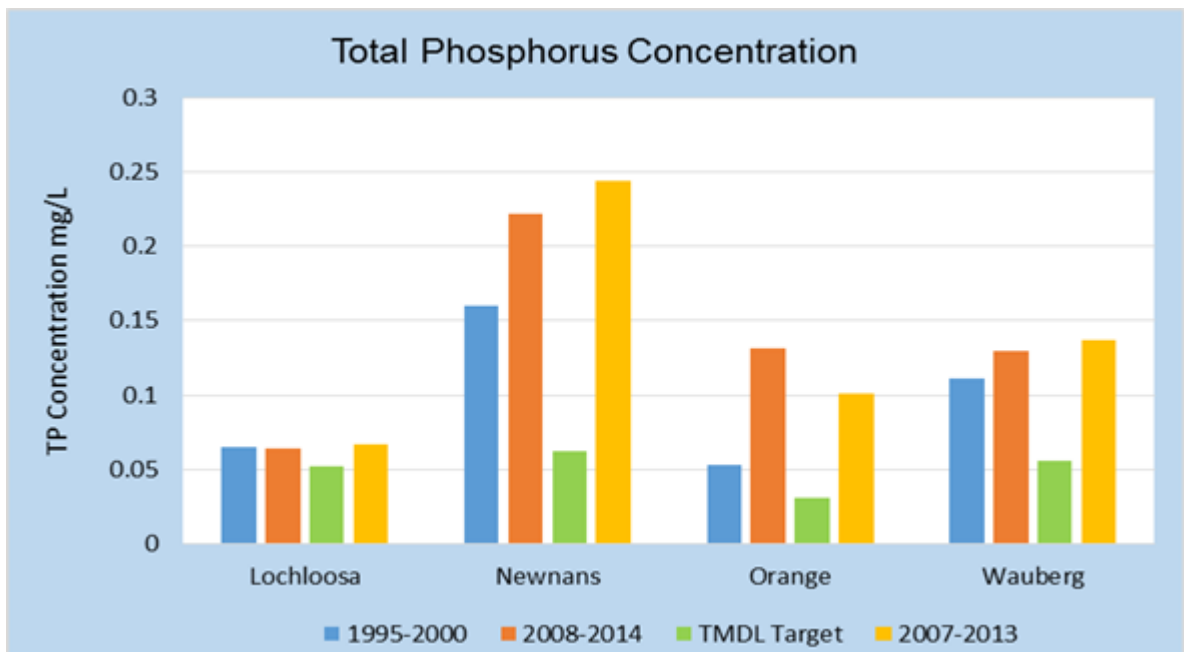


FIGURE 4. COMPARISON OF ANNUAL AVERAGE TP CONCENTRATION BETWEEN THE TMDL DATA PERIOD AND POST-BMAP DATA PERIOD (*SUPRA* 28).

²⁸ Florida Department of Environmental Protection (FDEP). 2015. 2015 Annual Progress Report for the Orange Creek Basin management Action Plan. Prepared the Florida Department of Environmental Protection, Division of Environmental Assessment and Restoration, Water Quality Restoration Program, Tallahassee, Florida in cooperation with the Orange Creek Basin Working Group. August 2015 Draft.

7. Phosphorus

Phosphorus is naturally occurring in the Hawthorn Group formations. Throughout the Newnan's Lake and Lochloosa Creek/Lake watersheds, areas that may contain soils with elevated phosphorus, such as incised creeks with exposed Hawthorn Group materials, have the potential to increase phosphorus concentrations in surface waters. Similarly, excavation of stormwater ponds, ditching and other drainage improvements in phosphorus rich soils can release phosphorus into surface waters. This can add to the phosphorus loading in Lochloosa Lake, the downstream receiving water for Lochloosa Creek (including its tributaries) and other creeks within and in proximity to the EASP. Increased surface water flows under storm event conditions from urban development have a greater potential to increase surface water concentrations of phosphorus. Absent site specific data, it is impossible to predict the level of impact from mobilization of phosphorus to downstream water resources.

The revised submittal provides additional data and analyses (Preliminary Geological and Geotechnical Site Evaluation, GSE Engineering & Consulting June 2015) to address concerns associated with development within potentially phosphorus rich soils. Excavations for stormwater, potable water and wastewater utilities have the potential to expose phosphorus rich materials. GSE Engineering & Consulting recommends that a soil management plan be implemented to address how these soils are used on site to reduce the potential for phosphorus leaching. Pegasus Engineering states (Data and Analysis Technical Memorandum May 1, 2015 Revised June 4, 2015) that a detailed subsurface investigation within the footprint of the proposed stormwater management ponds and compensating storage areas will be conducted and evaluated to avoid excavation into the Hawthorn Group formations. If the Hawthorn Group formations are encountered lining the pond or compensating storage areas could be evaluated. Pegasus also states that excavated Hawthorn Group materials will not be used as fill. The applicant did not provide policies to address development in phosphorus rich soils; however, COSE Policy 4.6.16 addresses phosphorus in fill material and encountered in excavations.

8. Strategic Ecosystems

The EASP includes 33,467 acres of strategic ecosystems, as identified in the Alachua County Comprehensive Plan, which span all or portions of seven different strategic ecosystems (Map 11). These areas include the 22,865 acres that are already protected under existing conservation easements where development rights have already been removed. Strategic ecosystems are identified in the KBN/Golder Associates report, "Alachua County Ecological Inventory Project" (1996) as communities that add to the potential to promote connectivity and minimize fragmentation of natural systems and conservation features. Conservation and Open Space Element Objective 4.10 and associated policies are adopted in the Alachua County

Comprehensive Plan to ensure that the ecological integrity of each strategic ecosystem is sufficiently protected.

Proposed **EASP Policy 10.4.1.4** states “The process of identifying the lands suitable for conservation and the designation of 3,538 acres of land within the EASP as EA-PRES Land Use and 18,826 acres of land as EA-CON Land Use fulfills the requirements of Objective 4.10.” The policy excludes the EA-RUR area that is currently within the Lochloosa Creek Flatwoods Strategic Ecosystem. The other remaining lands owned by Plum Creek and within this strategic ecosystem are not included in this application and no analysis has been completed to determine if areas within the excluded sections should be protected as part of this request. Since these areas have been excluded, staff concludes that these areas are subject to the existing County Comprehensive Plan policies. However, it is not clear since the **EASP Policy 10.4.1.4** states that the EA-PRES and EA-CON Land Use fulfills the requirements of Objective 4.10 of the existing Comprehensive Plan and proposed **EASP Policy 10.1.2.** states that *...c. All other goals, objectives and policies that do not directly or indirectly conflict with the EASP shall apply to the Planning Area. In the event that there is determined to be a direct or indirect conflict between Envision Alachua Sector Plan Objectives and Policies and the Goals, Objectives and Policies of the Alachua County Comprehensive Plan, the Envision Alachua Sector Plan Objectives and Policies shall control. ...*

The provided analysis is not consistent with Alachua County COSE Policy 4.10.5, which states that “Each strategic ecosystem (SE) shall be preserved as undeveloped area, not to exceed 50% of the upland proportion of the property.” Developed areas within strategic ecosystems shall be further designed in a manner which will reduce impacts to the remaining areas of the strategic ecosystem. COSE Policy 3.6.10 states “[T]he intensity of development on land adjacent to conservation and preservation areas shall be determined based on the unique characteristics of the conservation area. Land use shall be consistent with natural resource protection.” And COSE Policy 3.6.7 states “Development shall not be allowed at the maximum densities and intensities of the underlying zoning district, if those densities would be harmful to natural resources.” The County requires clustering of rural residential developments over 24 units and allows for density bonuses associated with clustering of properties and the permanent protection of conservation areas. The EASP, if adopted and developed, would significantly negatively affect the ecological integrity of Lochloosa Creek Headwaters Flatwoods Strategic Ecosystem.

C. Protection of Natural Systems

This section of the report analyzes the proposed amendments for impacts to and protection of natural resources.

Part 1 of the proposed amendments to the Future Land Use Element, proposed **EASP 10.0 1. Conservation Lands** outlines criteria for selection of proposed conservation lands as follows:

- Contribution to regional landscape linkages within Northern Florida
- Protection of large forested wetland systems to protect core habitat
- Contiguity with existing conservation lands
- Opportunity to “build upon” Alachua County’s Emerald Necklace
- Contribution to natural resources, watershed, and preserves such as Phifer Flatwoods
- Enhancement of Lochloosa Creek’s connected wetland system to promote linkages for wildlife habitat

The proposed future land use map for the EASP does not appear to follow these criteria. More specifically, following the criteria listed above should have resulted in more aggressive conservation land allocation in the areas around Lochloosa Creek and east of Newnan’s Lake. The EA-PRES land use corridor area still lacks several components that would make it a viable and functional wildlife corridor. This issue is further discussed in the section titled *Habitat/Wildlife Corridors*.

In addition to the areas designated as EA-CON, the proposed amendment does include open space provisions for each EOMU Area. The applicant defines open space *“as any natural, recreational, or common open areas, either publicly or privately owned, set aside, dedicated, designated, or reserved for the private use of enjoyment of owners or occupants of land adjoining such open space, or for the public at large”* (proposed **EASP Policy 10.3.4.3**). This EASP policy goes on to state that *“When land development involves a parcel that contains wetland and wetland buffer areas pursuant to Policy 10.4.3.4.4, the open space requirements shall be fulfilled first with wetlands and wetland buffer areas, then with other allowable types of open space.”* This proposed EASP policy is very similar to the County’s current COSE Policy 5.2.3, which states *“When land development involves a parcel that contains conservation areas, the County’s open space requirements shall be fulfilled first with conservation areas, then with other allowable types of open space.”* Thus, the County’s open space requirements shall be fulfilled first with wetland and wetland buffer areas, and then with other allowable types of open space. However, proposed **EASP Policy 10.3.4.4** allows the applicant to impact wetlands without county approval, conflicting with the County’s requirement for protecting and avoiding wetland impacts when designating open space.

In the County’s current comprehensive planning process, natural resources are identified for protection prior to the design of the land development footprint of the proposed project. The beneficial outcome of the County’s land use planning framework is that the land development footprint avoids and minimizes damage to natural resources. In contrast, the proposal appears to put the land development footprint first with less regard to the protection of natural resources. For example, the proposal allows 400 acres of wetland loss in order to accommodate the applicant’s preferred land development footprint.

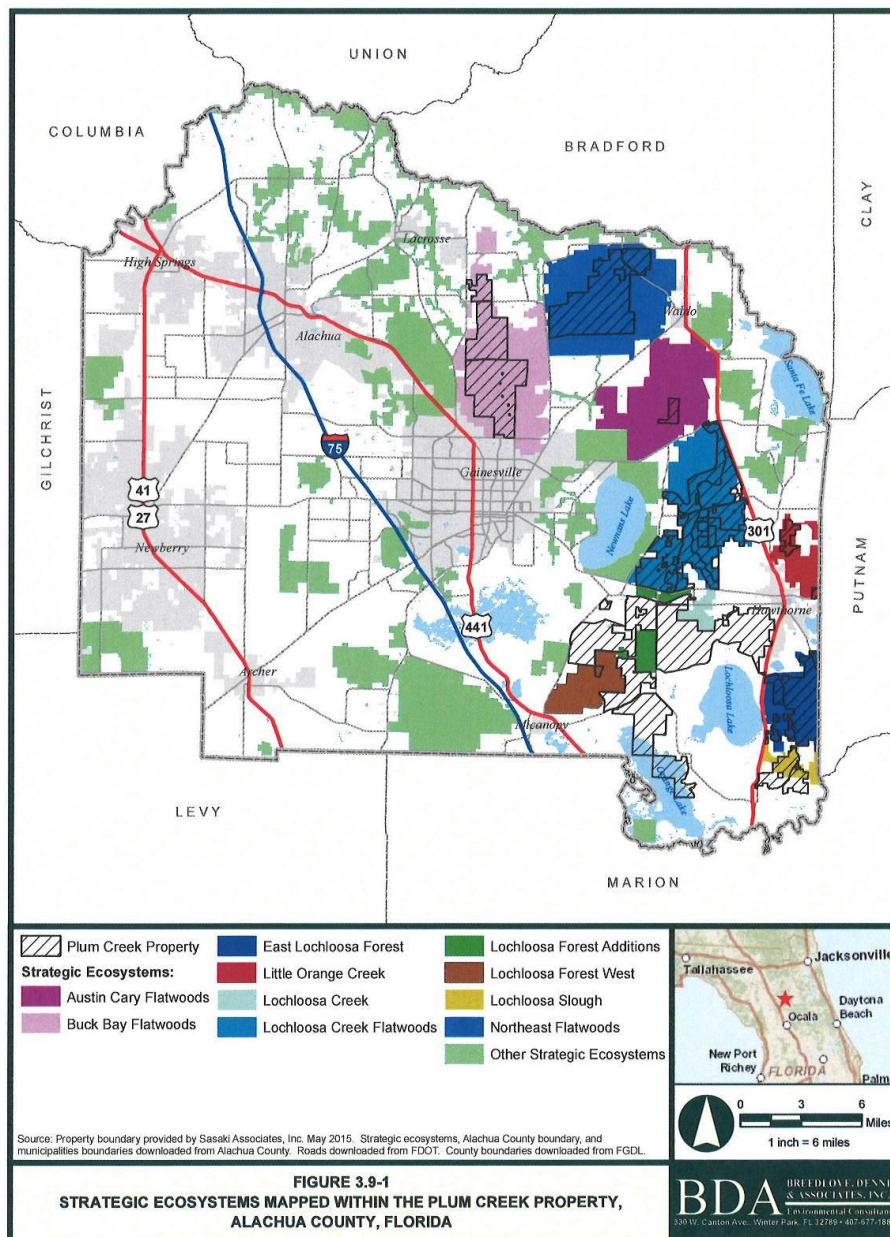
1. Strategic Ecosystems

As mentioned previously in the staff report, the entire EASP area has an existing land use designation of Rural/Ag or Preservation and most of the EASP area is within mapped Strategic Ecosystems (Alachua County Comprehensive Plan 2011-2030 COSE Adopted Map #4). Map 11, below, is from the applicant's environmental data and analysis, Figure 3.9-1 showing strategic ecosystems mapped with the Plum Creek properties. On Map 11, areas designated as strategic ecosystem are recognized as large, connected, environmentally-sensitive areas with specific development standards in place that require that any development within these systems to not negatively impact the ecological integrity of the system.

The applicant is proposing to place only the Lochloosa Creek corridor in Preservation land use with other conservation open space areas to be determined at the time of DSAP. This limited amount of designated conservation area is slightly less than current County regulations would require for the protection of the Lochloosa Creek Headwaters Flatwoods Strategic Ecosystem without a special area study demonstrating that this lesser amount of protection is warranted. The applicant's data and analysis provided no such study. Although the applicant is proposing 47% of the upland to be set aside as open space, they are requesting that up to 400 acres of wetland be removed without County review and approval. Therefore, staff still believes that the EASP, as proposed, would significantly negatively affect the ecological integrity of Lochloosa Creek Headwaters Flatwoods Strategic Ecosystem.

Based on proposed **EASP Policy 10.4.1.4** and lack of data and analysis for this strategic ecosystem, it appears that the applicant is sacrificing the long-term success of the strategic ecosystems between or near SR 20 and SR 26 in exchange for the designation of conservation over all other strategic ecosystems on lands in their ownership. Existing County policies are written specifically to make sure that ecological integrity of each Strategic Ecosystem is protected.

Proposed **EASP Policy 10.4.1.4 Protection of Strategic Ecosystems** states that the process of identifying the lands suitable for conservation and the designation of 18,826 acres as EA-CON and 3,538 acres within the EASP as EA-PRES Land Use fulfills the requirements of the existing strategic ecosystem COSE Objective 4.10.



MAP 11. STRATEGIC ECOSYSTEMS FROM APPLICANT'S ENVIRONMENTAL DATA AND ANALYSIS, FIGURE 3.9-1.

This proposed EASP policy assumes that the process for identifying lands as EA-CON as outlined in proposed **EASP Objective 10.0 1** is an acceptable method for identifying conservation lands. This Objective states in part that the conservation lands were so designated ensuring sufficient lands to accommodate future needs of Alachua County for jobs creation centers and population growth. The Objective goes on to state that Conservation Lands were identified in locations that would protect valuable natural resources, particularly those that support the long term economic and environmental objectives of Alachua County. None of these criteria are clearly followed in the proposed amendment to the future land use map, except perhaps the criteria of identifying lands for job creation. Adopted COSE Policy 3.1.1 states that conservation areas shall consist of natural resources that, because of their ecological value, uniqueness and

particular sensitivity to development activities, require stringent protective measures to sustain their ecological integrity.

Proposed **EASP Policy 10.4.1.4** and associated policies do not sufficiently address protection of all identified strategic ecosystems and are inconsistent with COSE Policy 3.6.3, 3.6.10, 4.10.1, 4.10.3, and 4.10.5 as it pertains to the impacts to Lochloosa Creek Headwaters Flatwoods Strategic Ecosystem.

2. Habitat/ Wildlife Corridors

The proposed wildlife corridor is approximately nine miles long and typically 1,900 ft. to 2,500 ft. wide and mainly runs along Lochloosa Creek with a western branch connecting to the Newnan's Lake Conservation Area. The corridor is identified as EA-PRES (Preservation Land Use) (Map 6 and Map 13).

The revised corridor consists of 3,538 acres of land designated as EA-PRES. This is an increase of approximately 905 acres from the 2014 application. This land based on best available data consists of approximately 1,966 acres of wetlands (approx. 55%) and 2,097 acres of floodplain. (approx.. 59%) (which includes the 1,966 acres of wetlands). The change in land use designation to Preservation, prior the land was designated Conservation, improved the management of these lands as a corridor by limiting silviculture and other agricultural uses. There is a new segment added that runs along the east side of the SR 20 Job Center (previously known as Area A) that connects to SR 20 across from the Phifer Flatwoods Preserve. Unfortunately, there is a portion of this segment that gets as narrow as 200 feet wide, reducing the quality and effectiveness of this new segment.

Most of the EASP area falls within one of the higher priority (Priority 3) corridors within the Florida Ecological Greenways Network (FEGN) (Map 12). The FEGN is briefly discussed in the applicant's Environmental Data and Analysis. The FEGN has six priority levels. All priority levels of the FEGN are of statewide significance and are relevant to planning from statewide to local scales. In particular, the top three priority levels are of the highest statewide significance, with the most importance for providing a functionally connected network of public and private conservation lands across the state. Priority 3 areas provide significant alternate routes to Priority 1 Critical Linkages. Priority 3 areas are identified as large, intact, functionally connected landscapes potentially capable of providing the same functions as Priority 1 Critical Linkages.

Lands within the FEGN are described as opportunity areas for protecting large, intact, functionally connected landscapes of statewide to regional significance. Not all of the areas within the FEGN need to be included in designed wildlife/ecological corridors to achieve functional protection of these landscape features and the ecological functions they support. Staff recognizes that the FEGN is intended to serve as a general planning tool to guide conservation programs and planning and is not intended to be used as the basis for regulation

nor replace data needed to ground-truth features of conservation significance. However, inclusion within the FEGN warrants careful consideration of the design of proposed protected and developed features to ensure that the natural resource function of these FEGN features are maintained. In general, the higher priority corridors within the FEGN (at least Priority 1-Priority 3) were identified to provide various ecological connectivity functions, from the movement of individuals of fragmentation-sensitive species within home ranges, to dispersal movements of individual animals to provide population and genetic exchange between subpopulations, to providing opportunities for species to adapt to current and future environmental changes (T. Hootor, personal communication).

Proposed **EASP Policies 10.3.3.5** and **10.3.4.5** provide only a 50' buffer to lands with existing conservation easements. Because this proposed policy is in direct conflict with the requirements of the Preservation Buffer Overlay District (Ch. 405, Article 8) and COSE Policy 3.6.8, staff assumes that, if proposed **EASP Policies 10.3.3.5** and **10.3.4.5** were adopted, it would override existing policy and regulations on this subject.

Preservation (EA-PRES) Land Use (proposed **EASP Policy 10.2.3**) would prohibit residential uses or transfer of density from conservation land use areas. Within EA-PRES, the proposed EASP policies would permit road crossings (including up to four additional roadway crossings that will bisect the wildlife corridor). In addition, SR 20 and CR 1474 may need to be expanded to meet the demands of the proposed development. The roadway expansions would impact property proposed to be designated preservation land use. Proposed **EASP Policy 10.2.3** states that four new road crossings of the EA-PRES designated wildlife corridor would be planned and designed using 2013 Florida Department of Transportation Wildlife Crossing Guidelines. The applicant did provide policy language that would require the use of these guidelines. However, based on our review of the guidelines, if followed, these guidelines appear to suggest that no designs will be incorporated to accommodate the safe passage of wildlife through the corridor.

The other conservation lands will have a designation of Conservation (EA-CON) and the proposed EASP policies (**EASP Policy 10.2.4**) for these areas would permit silviculture and low intensity agriculture (employing State designated best management practices), hunting, as well as stormwater management facilities.

The proposed EA-EOMU area and wildlife corridor are also within the Critical Ecological Corridors Map (adopted COSE Map #5). This Map is intended to show areas within in the County that should be prioritized to maintain the ecologically-functional linkages between ecological corridor core areas. These mapped areas have been prioritized as the most important areas to be linked in the open space network, or greenways system.

The proposed wildlife corridor along Lochloosa Creek does not meet the intended goals and strategies for the Critical Ecological Corridor Map because it lacks the design standards to be a

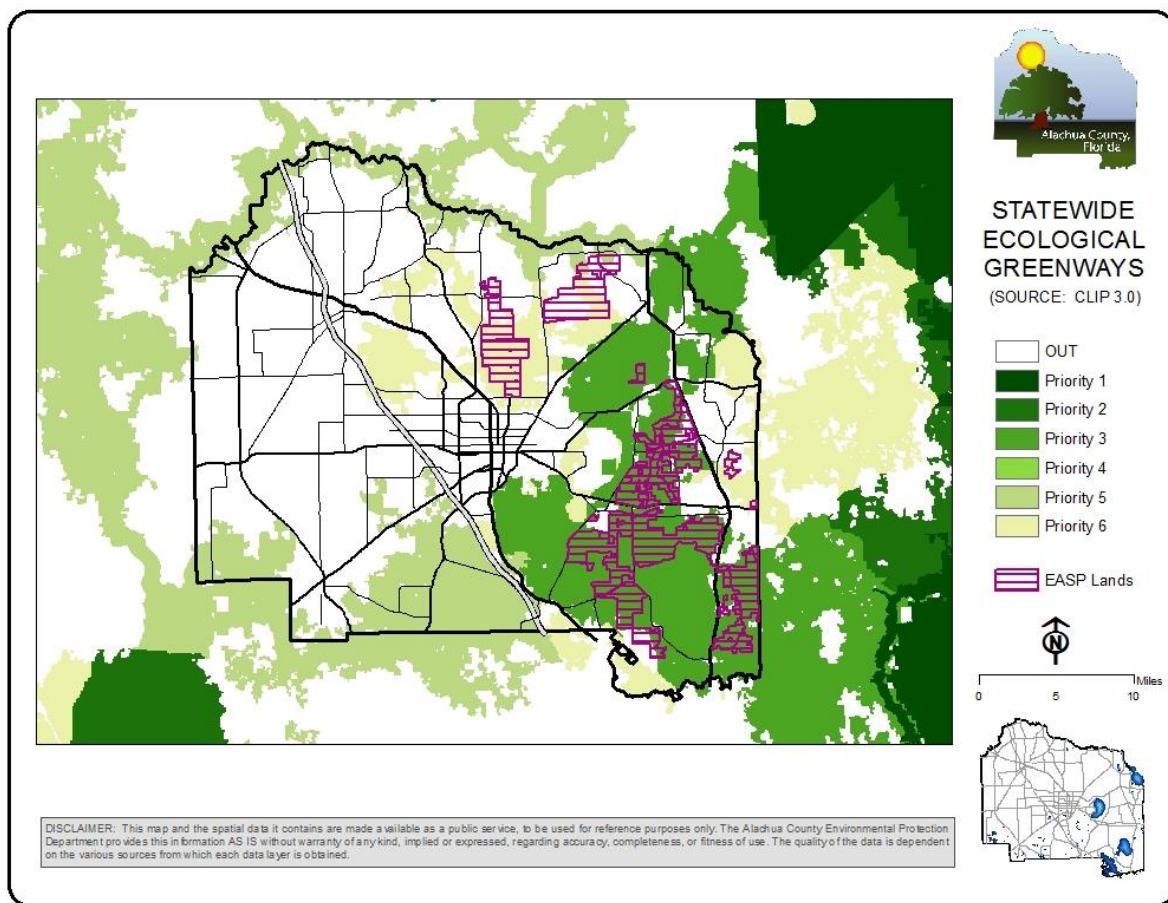
regional corridor based on its location and limited size (width) and allowance for additional road crossings. These concerns are further detailed below.



PHOTO 1. WILDLIFE CROSSING AT HAWTHORNE ROAD (SR20) AND LOCHLOOSA CREEK (TAKEN JULY 31, 2014).

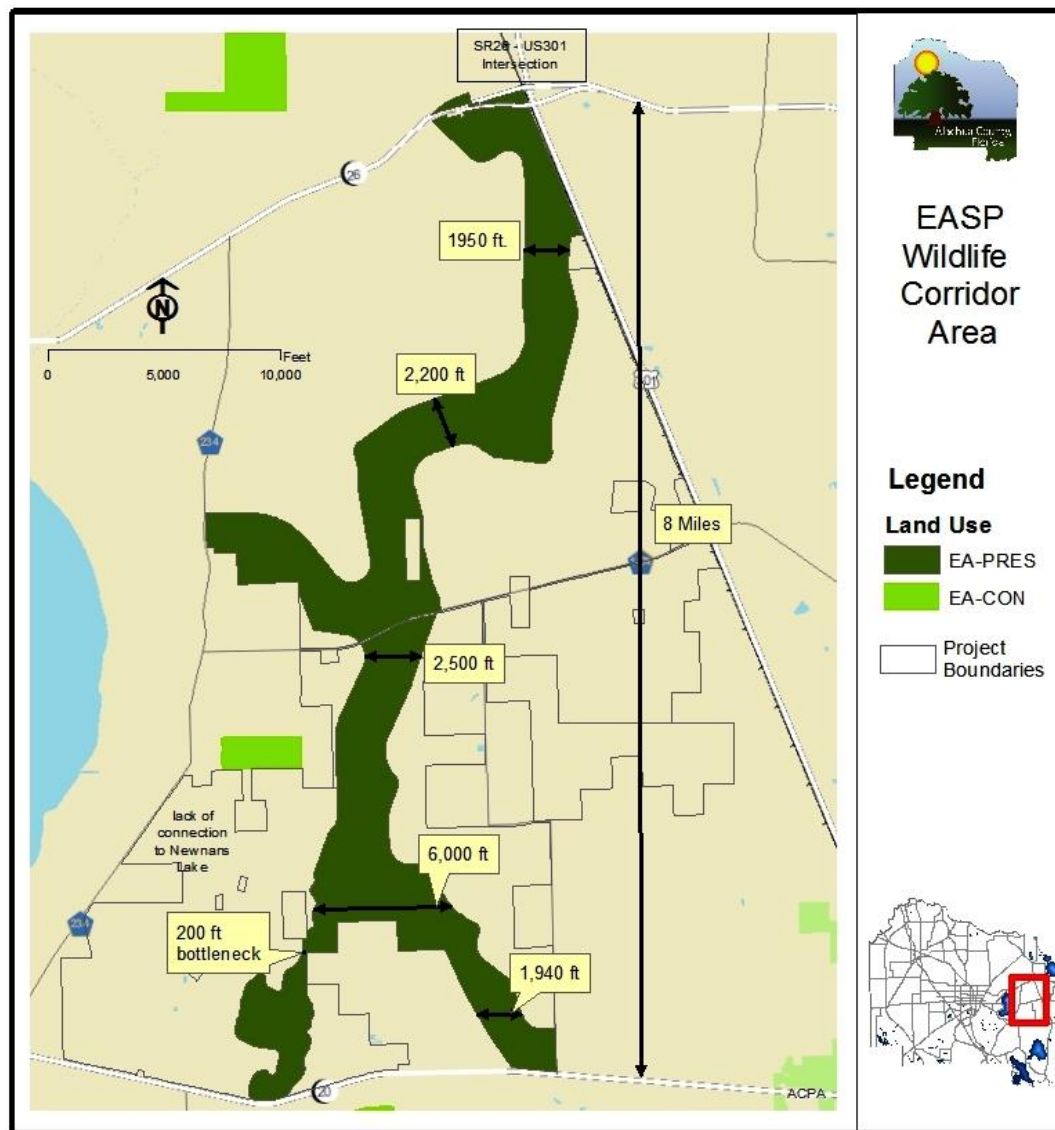
Construction of new roads and expansion of existing roads will increase wildlife mortality, cause fragmentation and degrade any effectiveness of the already inadequately designed corridor.

From a species perspective, wide-ranging species and other fragmentation-sensitive species require corridors that provide the opportunity to use either secure home ranges or to move safely between subpopulations. Shorter corridors (up to a few miles long) should be at least a quarter mile wide or so to support these functions. Longer, regional corridors or corridors designed to provide functional habitat for focal species would need to be significantly wider, with a minimum of a mile wide considered a basic standard and wider being preferred. For example, a minimum corridor intended to support a potentially functional home range of a female Florida black bear would ideally be at least two miles wide. Overall, corridors should also be wider as they get longer, with a minimum guideline for having corridors that are at least 1/10 as wide as they are long. For example, this would mean that the minimum width of a corridor that is 10 miles long would be 1 mile wide. (T. Hctor, personal communication).



MAP 12. FLORIDA ECOLOGICAL GREENWAYS NETWORK WITHIN THE EASP AREA

From the standpoint of providing functional habitat for all focal species, supporting ecological processes such as watershed functions and fire regimes, and facilitating adaptation to future environmental change, landscape-scale ecological connectivity is best achieved through the protection of large swaths of public and private rural land. Such broad ecological connections are often called landscape linkages, which can be defined as areas of habitat sufficiently wide and connected to both support populations of species of conservation interest and functional ecological processes while providing connectivity to other large blocks of habitat. Landscape linkages require designing the protection of broader, connected areas of conservation significance instead of narrower, linear corridors surrounded by intensive land uses. From this perspective, corridors or landscape linkages that are intended to serve all focal species and ecological functions over broad periods of time to facilitate both viable populations and adaptation to environmental change need to be on the scale of miles wide to achieve these functions.



MAP 13: LOCATION OF EA-PRES LAND USE AND WILDLIFE CORRIDOR

Deficiencies in proposed amendments: The proposed EA-PRES corridor location does not protect the currently designated strategic ecosystem or provide the necessary design features to demonstrate that it will function appropriately and effectively as a regionally significant ecological corridor.

Sec. 163.3177(f), Fla. Stat., requires that comprehensive plan amendments be based on appropriate data and analysis. The applicant has not demonstrated, based on the proposed land use plan and associated policies, how the proposed plan will “Support local and state conservation activities that enhance wildlife connectivity” (Application backup data and analysis submitted with the application, Planning Principles, Environmental Data & Analysis, pg. 6). There is also no discussion or justification of the conservation plan in regards to how it will accomplish the following:

“Landscape linkages contribute to the maintenance of wildlife populations and their viability by providing habitat and serving as conduits for dispersal and gene flow among populations, thus ensuring the long-term persistence of resident species. The LTMP Environmental Plan will protect vital landscape linkages within the Property and connections to regionally-significant ecological areas within Alachua County (Figure 2.3.3-1) and Northern Florida (Figure 2.3.3.-2).” (Landscape Linkages, Environmental Data & Analysis, pg. 10)

Given that large areas of a Florida Ecological Greenways Network Priority 3 linkage is proposed to be developed in this plan, there is no explanation how the proposed preservation/conservation areas will still achieve the conservation goals of *“maintaining wildlife populations and their viability by providing habitat and serving as conduits for dispersal and gene flow among populations.”* Lastly, the data and analyses provided do not address the impact of the urban wildland interface, habitat enhancement or the issues of the cumulative edge effect of such a narrow corridor with multiple road crossings.

3. Listed Species and Listed Species Habitat Protection

The applicant provided an analysis of Federally- and State-listed species and included FNAI (Florida Natural Areas Inventory) state rank of S1, S2 or S3 (rare) species that occur or are likely to occur within the property and within Alachua County. The likelihood of occurrence also was analyzed. Seventeen Federally- or State-listed animal species had a likelihood of occurrence based on the applicant’s data and analysis.

a. Local vs. Regionally Significant Resources

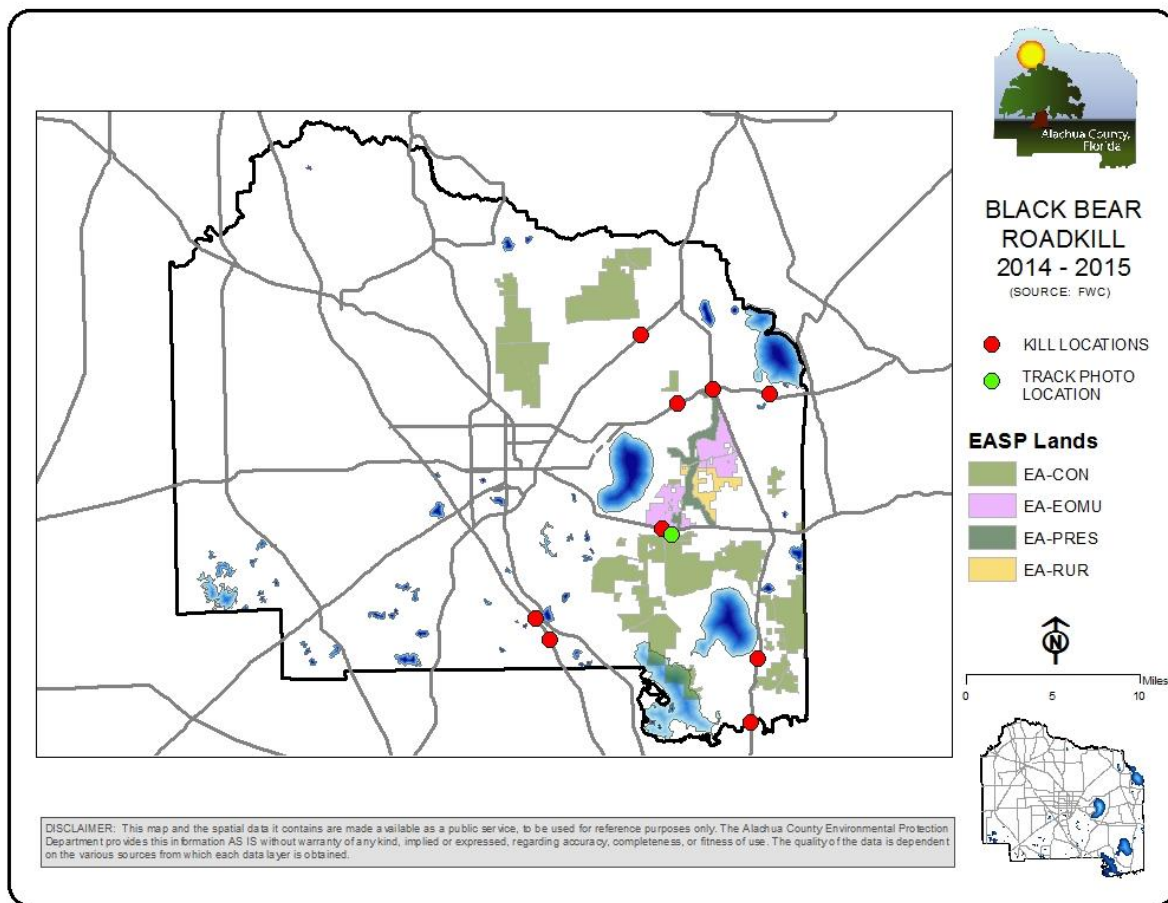
A fundamental difference between the existing resource protection policies and these proposed EASP policies is that the proposed policies only recognizes regionally significant conservation resources while not recognizing or identifying local conservation resources (see proposed **EASP Policy 10.1.1.1, 10.1.3, Obj. 10.4.1**). Proposed **EASP Policy 10.4.1.2** provides for the protection of species listed by FFWCC and USFWS. These proposed EASP policies are inconsistent with protection of local resources and protection of listed species as defined by the County, which includes S1 – S3 FNAI-listed species and their habitats (COSE Policy 3.1.1 and policies associated with COSE Obj. 4.9).



Proposed **EASP General Strategy 4** mentions ‘Protect and retain regionally significant lands for conservation, habitat protection and wildlife connectivity.’ Even though the additional conservation lands proposed by the applicant in northern and southeastern Alachua County could help to achieve habitat protection and wildlife connectivity goals, the proposed development would occur in the area most significant for protecting ecological connectivity in the County. The landscape around Lochloosa Creek serving as the keystone connection between the larger areas of existing and proposed conservation lands in the southern and northern portions of Alachua County and beyond. The proposed conservation corridor along Lochloosa Creek, surrounded by the very large areas of proposed new development, will not serve as a viable landscape-scale habitat for fragmentation-sensitive wildlife species or as a functional regionally-significant ecological corridor for these species.



Black bear tracks observed by county staff on Dec. 19, 2014 at the Phifer Flatwoods Preserve.



MAP 14. 2014-2015 BLACK BEAR ROADKILL DATA FOR ALACHUA COUNTY (SOURCE: FWC)

Deficiencies in proposed amendments: Comprehensive plan amendments must be internally consistent, Sec. 163.3177(2), Fla. Stat. and Alachua County Comprehensive Plan FLUE Policy 7.1.23. Proposed **EASP Policy 10.4.1.2**, Conservation Management Plans, provides for the protection of species listed by FFWCC and USFWS, but the selection of conservation areas does not appear to correlate with the protection of listed species. In addition, the proposed policy is inconsistent with protection of local resources and protection of listed species as defined by the County, which includes S1 – S3 FNAI-listed species and their habitats (COSE Policy 3.1.1 and policies associated with COSE Obj. 4.9).

4. Permanent Protection and Management of Conservation Areas

Proposed **EASP Policy 10.4.1.1** offers conservation easements over two types of areas, Permanent Preservation Areas and Permanent Conservation Areas. Permanent Preservation Areas include EA-PRES land areas at the time of approval of the first DSAP and with a management as outlined in **EASP Policy 10.4.2.1**. Lands identified as EA-CON will also be placed under a conservation easement. All conservation easements for either of these Areas will be transferred to the St. Johns River Water Management District and to a qualified conservation organization acceptable to the County and after review and approval as to form and content.

However, several proposed EASP policies limit protection strategies within EA-CON areas. Proposed **EASP Policy 10.2.4** specifically prohibits the County from applying additional conditions or restrictions on silviculture uses within EA-CON lands and allows for stormwater management and road crossings within these lands, including up to four additional crossings of Lochloosa Creek. Some of these areas arguably could remain in intensive industrial silviculture if the goal is not for habitat conservation, restoration, or enhancement. Others, like the EA-PRES corridor, require more stringent protection and management strategies to remain viable and sustainable.

Proposed **EASP Policy 10.4.1.2.1** states that *“The management plans shall be prepared by a group of knowledgeable persons appointed by the County and which shall include representatives of the landowners and grantees under the conservation easement and others with ecological, forestry and environmental land management expertise.”* Further, proposed **EASP Policy 10.4.1.2.c** states that *“The management plan shall be submitted to the holders of the easement within twelve months of the transfer of the easement”* and *“Implementation of the management plan will then be funded by the owner or its successors in interest,”* respectively. These proposed EASP policies bring up several questions and concerns:

1. Will an entity be willing to take an easement without having an approved management plan?
2. Will the County Commission agree to an easement without a finalized management plan, and if so can the Commission place conditions on the easement?
3. What if a management plan is not approved within 12 months of the easement transfer?
4. What if the easement holder disagrees with conditions in the management plan?

Staff is still not clear how these questions and issues will be addressed.

D. Water Supply Data and Analysis

The St. Johns River Water Management District (SJRWMD) is in the process of finalizing its 2014 Water Supply Plan²⁹. The draft Water Supply Plan includes planning level projected ranges of water demand through 2035, sustainable levels of fresh groundwater withdrawal and resulting deficits, and the methods and means to supply water to all users in a sustainable manner. This Plan is conceived to address the entire Water Management District, which is divided into four regions. Plum Creek’s Envision Alachua Sector Plan is within the SJRWMD Water Supply Planning Region 1 (Map 15). Region 1 is bound by Georgia on the north, the Atlantic Ocean on the east, Region 2 on the south, and the Suwannee River Water Management District (SRWMD)

²⁹ St. Johns River Water Management District (SJRWMD). 2014. District Water Supply Plan. Final draft.

on the west. This region also is included in the North Florida Regional Water Supply Partnership area, which also includes the eastern Suwannee River basin portion of the SRWMD. The Water Management Districts are currently collaborating in the development of a North Florida Regional Water Supply Plan and it is expected that the SJRWMD will update the Region 1 water supply section after the North Florida Regional Water Supply Plan is approved.

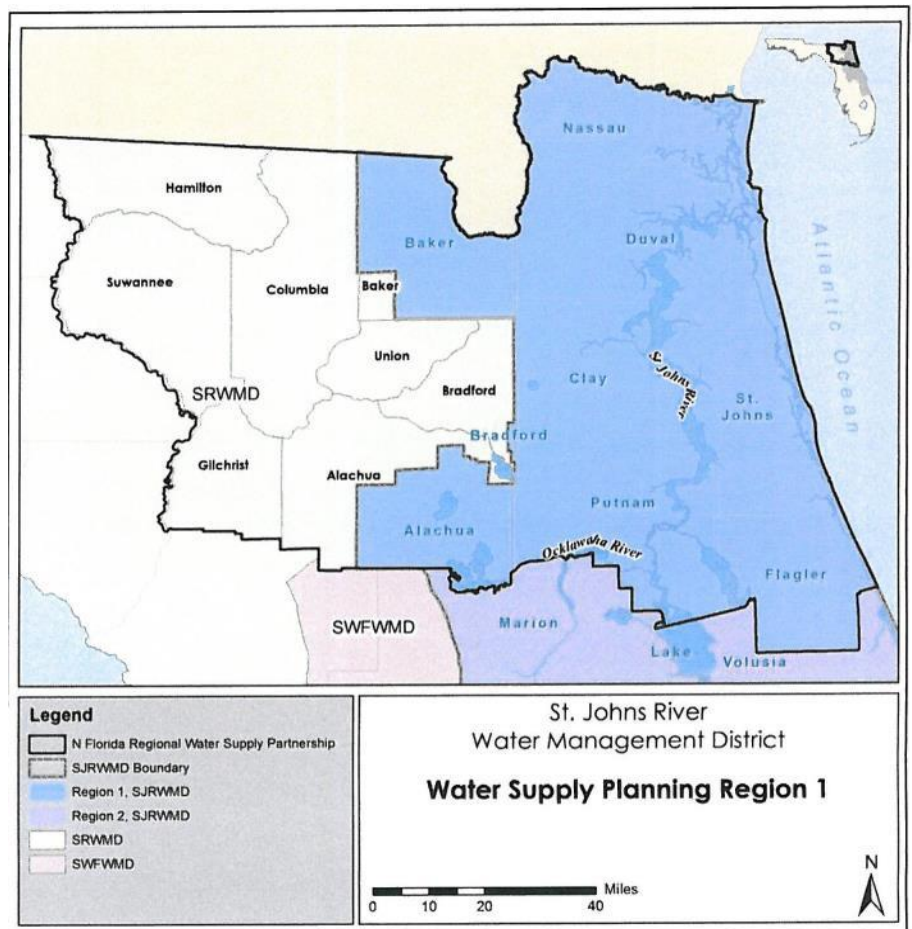
According to the SJRWMD Draft Water Supply Plan, the population in Region 1 is expected to increase by 690,000 people (40%) by 2035 and, assuming no further decrease in per capita consumption, water demand is expected to increase by 130 million gallons per day (MGD (30%) by 2035. Results of the water resource analysis performed by the SJRWMD indicate that fresh groundwater alone cannot supply the projected increase in water demand without unacceptable impacts to wetlands, minimum flows and levels, and spring flows. The groundwater demand projection for Region 1 (493 MGD) exceeds fresh groundwater availability by 74 MGD. In its report, the SJRWMD has identified a number of water conservation and alternative water supply projects necessary to make up for the projected deficit.

Section 163.3245(4)(b), F.S. has provisions relating to sector plans and regional water supply plans and consumptive use permitting by water management districts:

“Upon the long-term master plan becoming effective...the water needs, sources and water supply development projects identified in the adopted plans pursuant to subparagraphs (3)(a)(2)” (relating to long-term master plans) “and (b)(3)” (relating to detailed specific area plans), shall be incorporated into the applicable district and regional water supply plans.... .” Additionally “an applicant may request and the applicable district may issue consumptive use permits for the durations commensurate with the long-term master plan or detailed specific area plan, considering the ability of the master plan area to contribute to regional water supply availability and the need to maximize reasonable-beneficial use of the water resource. The permitting criteria in s.373.223 shall be applied based upon the projected population and the approved densities and intensities of use and their distribution in the long-term master plan; however the allocation of water may be phased over the permit duration to correspond to actual project needs....”

Section 163.3245 (3)(a)2., F.S. requires the long term master plan to include “a general identification of the water supplies needed and available sources of water, including water resource development and water supply projects, and water conservation measures needed to meet the projected demand of the future land uses in the long-term master plan.”

Staff cannot fully evaluate the applicant’s ability to meet the projected water demands without more specific information than has been provided.



MAP 15. SJRWMD WATER SUPPLY PLANNING REGION 1 (SJRWMD, 2014)

1. Plum Creek’s Envision Alachua Sector Plan Projected Water Demand

The **EASP Policy 10.4.3.1** outlines the applicant Water Supply Strategy for the sector plan. The policy highlights water conservation, harvesting, recycling, water use monitoring and Florida Friendly practices as the key components of the water supply strategy. Supporting data and analysis is provided in the Technical Memorandum: “Envision Alachua Sector Plan – Water and Wastewater Data and Analysis”. The Technical Memorandum provides more specific examples of the proposed water supply strategies and suggests the use of community covenants and restrictions and zoning master plans as potential enforcement mechanisms. Staff has concerns regarding the applicant’s ability for the long term enforcement of the suggested water conservation strategies. Staff recommends that the adopted water supply strategies be incorporated as part of the consumptive use permit(s) for the sector plan.

2. Plum Creek’s Envision Alachua Sector Plan Alternative Water Supplies

Section 3.5 of the Technical Memorandum: “Envision Alachua Sector Plan – Water and Wastewater Data and Analysis”, describes potential alternative water supply options in order to minimize the impacts of the EASP. The applicant’s analysis briefly evaluates different options including surface water, seawater/brackish groundwater and indirect and direct potable reuse

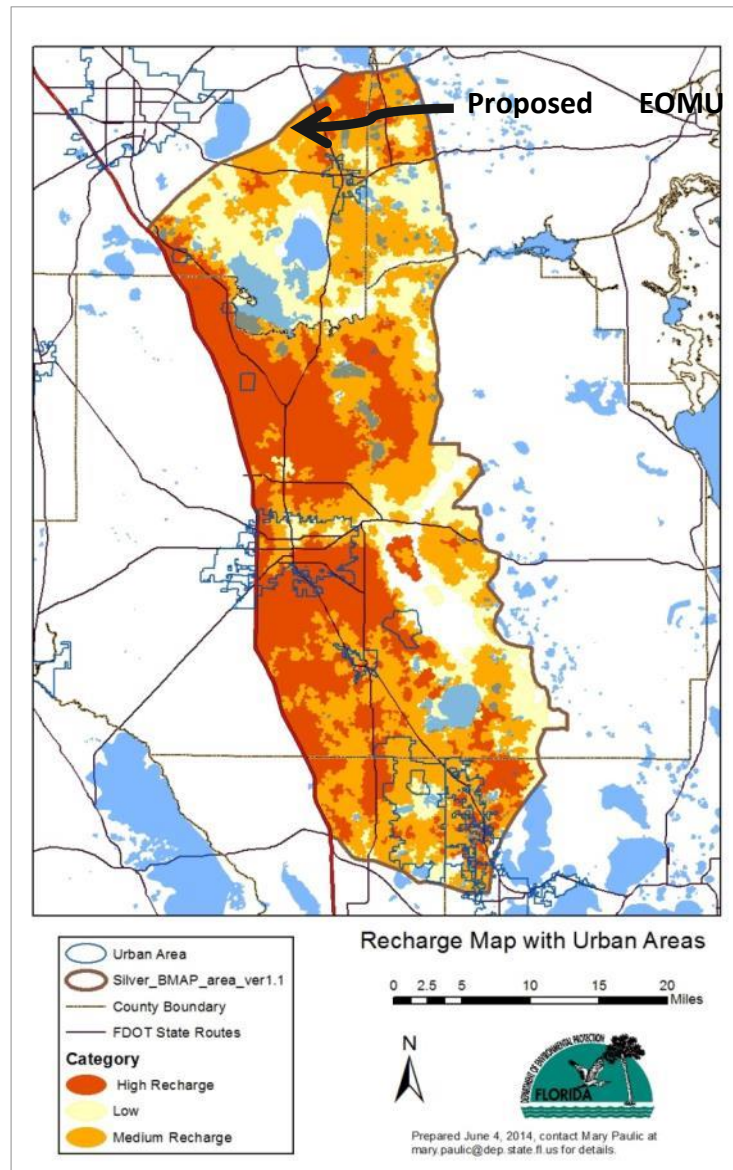
as potential alternative water supply options and concludes that the use of the Lower Floridan is an alternative and potentially reasonable water supply for this region. However, the report acknowledges the need for additional data in order to better define the feasibility of this option, specifically as it relates to water quality issues. Staff notes that the separation and degree of confinement between the Upper and Lower Floridan aquifer in Alachua County is uncertain and thus the Lower Floridan aquifer may not be an alternative water supply source in this area.

3. Springs Protection

Magnesia Springs is located south of SR 20 and discharges to Lochloosa Creek. The description of Magnesia Springs from the St. Johns River Water Management District is as follows:

Magnesia Spring is a fourth-magnitude spring. The spring vent is located in the bottom of a deep, 60-foot by 75-foot oval-shaped pool with aquatic vegetation and algae. Two artesian wells on the side of the pool supplement the spring flow as it runs toward the west about 800 feet to Lochloosa Creek. The spring is located on private property.

A portion of the EASP is located within the Silver Springs springshed (see Map 16) and the Silver Springs Basin Management Action Plan (BMAP) area³⁰. This designation must be considered when developing water use and nutrient management strategies for protection of



MAP 16. SILVER SPRINGS BMAP AREA (FDEP, 2014B).

³⁰ Florida Department of Environmental Protection (FDEP). 2014b. Silver Springs BMAP area map showing Floridan aquifer recharge and urban areas. Prepared the Florida Department of Environmental Protection, Division of Environmental Assessment and Restoration, Water Quality Restoration Program, Tallahassee, Florida. June 4, 2014.

groundwaters and surface waters. The applicant has not demonstrated there will be no adverse impact to springs. No discussion of springs was presented in the data and analysis. The only mention in the Environmental Data and Analysis were related to species that were present in “springs” habitat or location.

4. Minimum Flows and Levels

The Florida Department of Environmental Protection proposed Minimum Flows and Levels (MFLs) for the Lower Santa Fe and Ichetucknee rivers and priority springs are likely to affect the future availability of fresh groundwater in portions of Region 1 (see next section on Water Supply Data and Analysis). According to the SJRWMD Water Supply Plan, although additional analyses are pending completion of the North Florida–Southeast Georgia groundwater model, preliminary analyses indicate that the Ichetucknee and Lower Santa Fe MFLs present a significant constraint to the future availability of fresh groundwater in portions of Region 1. Minimum Flows and Levels prevention/recovery strategies authorized by the water management district will be implemented for the Clay/Putnam Lakes (*i.e.*, lakes Brooks, Geneva, Grandin and Cowpen).

In June 2013, the Suwannee River Water Management District (SRWMD) Governing Board requested that the Florida Department of Environmental Protection (FDEP) adopt MFLs it proposed for the Lower Santa Fe and Ichetucknee Rivers and Priority Springs. The decision was based on the technical work conducted for the proposed MFLs by SRWMD staff, and the potential for cross-basin impacts originating outside of the SRWMD. SRWMD staff had also assessed the streamflows observed in the recent historical record and recent trends in the flow regime, and determined that a recovery strategy was required. The Lower Santa Fe and Ichetucknee Rivers and Priority Springs MFLs were adopted by DEP. The proposed DEP rule was ratified by the Legislature (HB 7081) and signed into law by Governor Scott with an effective date of June 10, 2015 (Chapter 2015-128, Laws of Florida).

The adopted MFL designation for the Lower Santa Fe River must be considered when developing water use strategies for protection of groundwaters and surface waters. The applicant has not demonstrated there will be no adverse impact to the Santa Fe River and associated springs. No discussion of MFLs was presented in policies or the data and analysis.

E. Conclusions of Environmental Analysis

In conclusion, the EASP site contains significant natural resources and is a critical area for both regionally and locally significant natural resources and ecosystems. The data and analysis and proposed policies fail to adequately address issues and concerns regarding water supply, water quality, wetlands, floodplains, strategic ecosystems, wildlife habitat, ecological corridors, and protection and management of preservation/conservation areas.

COSE Objective 4.5 deals with protecting “...the quality and quantity of groundwater and springs resources to ensure long-term public health and safety, potable water supplies from surficial, intermediate, and Florida aquifers, adequate flow to springs, and the ecological integrity of natural resources.” Also, as stated in COSE Policy 4.5.10, “Withdrawals of ground water have the potential to result in adverse impacts on potable water supply and natural ecosystems. Development shall occur only when adequate water supplies are concurrently available to serve such development without adversely affecting local or regional water sources or the natural ecosystem, as determined in accordance with local and state law.”

Based on the environmental constraints existing at the proposed site and the planned intensity of the development outlined in the sector plan, staff has significant reservations regarding the applicant’s ability to meet the requirements of COSE Policy 4.5.10.

The applicant has failed to provide the necessary data and analysis and has not followed the appropriate methodology for locating such intense development in the area proposed (see COSE Policy 3.6.3).

V. Transportation Analysis

A. Summary of Transportation Analysis

The coordination of natural resources, land use and transportation planning is a hallmark of the adopted Alachua County Comprehensive Plan. The applicant has provided a transportation study of the potential transportation impacts of the Envision Alachua Sector Plan (EASP) utilizing the existing Gainesville Metropolitan Area Countywide Transportation Model. The applicant's transportation study demonstrates that many area roadways will not meet their adopted levels of service if the development is constructed without adding additional infrastructure. The applicant's proposed comprehensive plan policy response to mobility issues is counter to the larger mobility goals of the Comprehensive Plan aimed at creating walkable mixed use areas within the existing urbanized framework of Alachua County.

The EASP proposes an areawide level of service for automobiles within the Envision Alachua-Employment Oriented Mixed Use (EA-EOMU) Land Use Category. Areawide level of service is unsuitable in the case of the EASP due to relatively remote location of the EA-EOMU land use and the challenges of constructing a gridded multimodal transportation system on property with significant areas of wetlands, floodplains and other sensitive ecological features. The policy response in the EASP application is not appropriate to address the projected level of service deficiencies identified by the applicant.

The addition of capital improvements to the transportation system proposed in the EASP amendment would either be insufficient to mitigate the impacts of the proposed development or would not be consistent with goals for a gridded transportation network. Adoption of the proposed amendment would undermine the mobility goals of infill and redevelopment of existing municipalities and the Urban Cluster as expressed within the structure of the Comprehensive Plan.

B. Overview of County Transportation Planning

1. Existing Transportation Infrastructure

In order to understand how the EASP proposes to address mobility, it is critical to become familiar with the existing transportation infrastructure in the vicinity of the EA-EOMU. Existing roadway infrastructure in the vicinity of the EASP falls, generally, into three categories. The first is State-maintained roadways. The second is major County roads. The final includes other County maintained roadways. It should be noted that all roadways discussed in this section are designed as rural sections that do not anticipate urban scale land uses with the exception of roadways within the City of Hawthorne. Each of the facilities is identified on Map 17. For the purposes of this section, the EA-EOMU project area is generally defined to include the area

between Newnan's Lake on the west, US 301 on the east, County Road 2082 on the south and State Road 26 on the north. The focus in this section is on the segments in the closest proximity to the proposed sector plan area but it is important to remember, the proposed development would impact additional segments of State- and county-maintained facilities throughout Alachua County and adjacent counties (namely, Putnam, Marion and Bradford) as illustrated in Map 17.

There are three State maintained roadways in the area: US 301, State Road 20 (Hawthorne Road) and State Road 26. Both US 301 and State Road 20 are divided four lane facilities with rural sections (swales), except in the City of Hawthorne where both facilities transition to curb-and-gutter. US 301 runs generally north to south through the eastern portion of Alachua County, connecting to Ocala to the south and Starke to the north. State Road 20 runs east to west from the Putnam County line through Hawthorne and into Gainesville. State Road 26, which also runs east to west through Alachua County, is a rural two-lane undivided roadway. Both SR 20 and SR 26 have overpasses at their crossings of US 301 to facilitate better traffic flow and to provide for decreased conflicts with the existing railroad that runs parallel to US 301.

Both US 301 and State Road 20 are designated Strategic Intermodal System (SIS) facilities. The SIS is a network of transportation infrastructure that is intended to facilitate the movement of people and freight through and between different economic regions of the State. These facilities include not only roadways, but also ports, airports and rail lines. SIS facilities have been designated to ensure that people and freight can move efficiently between different modes of travel (*e.g.*, from port to market) and to protect the economic vitality of the State and its various regions.

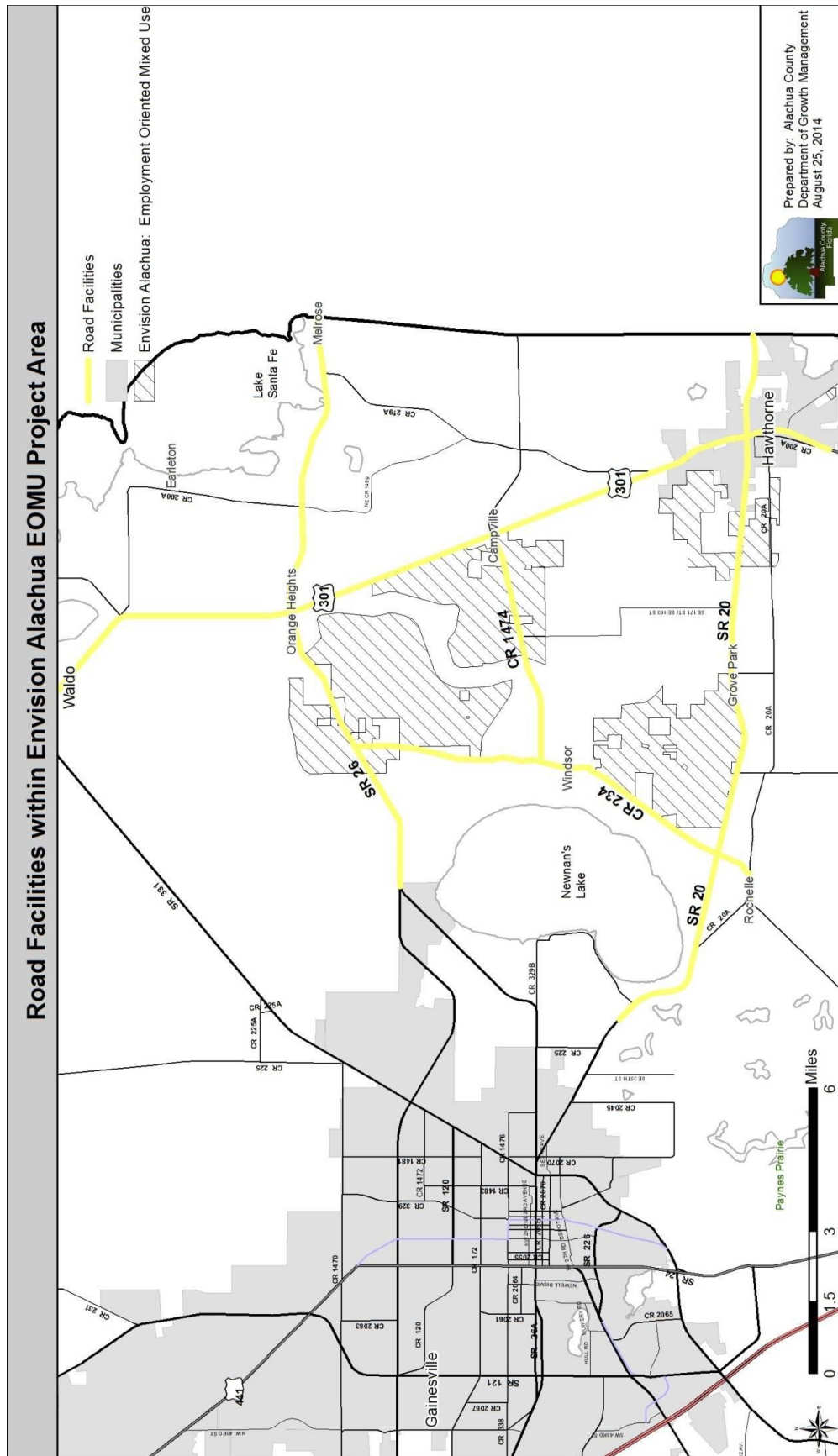
Major County-maintained roadways in the vicinity of the EASP include County Road 234, County Road 1474 and County Road 2082. County Road 234 runs from State Road 26 on its north end through the Windsor rural cluster to State Road 20 and beyond, eventually intersecting with US 441 at Micanopy. The facility is a 2-lane undivided rural roadway for its entire length with a constrained right-of-way through Windsor. County Road 1474 runs easterly from County Road 234 in Windsor to US 301 and on to the Putnam County Line. This roadway is also a 2-lane undivided rural roadway. County Road 2082 runs south of, and parallel to, State Road 20. It intersects State Road 20 south of Newnan's Lake and runs easterly across County Road 234, County Road 325 and finally into Hawthorne and its intersection with US 301. The facility is a rural 2-lane undivided roadway.



FIGURE 5. CR 234 NEAR WINDSOR RURAL CLUSTER AND SOUTHEAST 24TH AVENUE IN THE PROJECT AREA

In addition to the major County-maintained roads in the area, there are several local-type roads. These include Southeast 171st Street, Southeast 24th Avenue, Southeast 163rd Street, and Southeast 152nd Street. Each of these facilities is an undivided 2-lane rural facility. These facilities are not regularly monitored for traffic counts because they generally serve only local transportation needs and serve a relatively low number of residential uses. However, because of their location and potential to be impacted they are analyzed here. There are also a number of County-maintained graded roads in the area. These roadways are not enumerated individually here. However, they, too, provide transportation services to current residents surrounding the EASP area.

While there are a substantial number of roadways in the area, there are also other important transportation facilities. These include the CSX rail line that runs parallel to US 301 on the east side of the EASP area and, further away, the Gainesville Regional Airport, located west of the EASP area on State Road 222.



MAP 17. ROADWAYS IN VICINITY OF EA-EOMU AREA

2. Background: Alachua County Transportation Planning Structure

The Transportation Mobility Element of the Alachua County Comprehensive Plan is structured around a clear delineation around the community's expectations of mobility within urban areas vs mobility expectations in the County's rural/agricultural landscapes.

3. Transportation Planning Inside the Urban Cluster

In 2010, the County adopted Comprehensive Plan Amendment CPA-01-09, otherwise known as The Alachua County Mobility Plan. The Mobility Plan recognized the importance of planning for transportation and land use in a coordinated manner. A hallmark of the plan was planning for mobility using multiple modes of transportation, including automobile, transit, bicycle and pedestrian modes inside the Urban Cluster. A key revision to the Comprehensive Plan structure was an element of the Mobility Plan related to the planning and regulation of new development. The Mobility Plan amendment eliminated the strict road segment by road segment concurrency approach to transportation planning inside the Urban Cluster. Instead, the amendment provided that, inside the Urban Cluster Transportation Mobility Districts, automobile level of service would be determined on an areawide basis by averaging the maximum service volumes of the roadway system across parallel roadway corridors.

A second piece of the Mobility Plan was the identification of specific transportation improvements necessary to support anticipated growth in the Urban Cluster. In order to fund the transportation improvements called for in the Comprehensive Plan's Capital Improvements Element, the County adopted a Multi-Modal Transportation Mitigation (MMTM) Program for use within the Urban Cluster Transportation Mobility Districts. The MMTM is the method the County uses to fairly apportion the costs associated with identified new infrastructure to the growth and development necessitating the demand for the infrastructure.

4. Transportation Planning Outside the Urban Cluster

Outside of the Urban Cluster, the County uses a more traditional approach to transportation concurrency because demand for new capacity is reduced in the rural areas based on the adopted Future Land Use. Additionally, the County uses this approach in order to incentivize the fiscally efficient use of existing resources by focusing infrastructure improvements within urban infill and redevelopment areas. The applicable Comprehensive Plan policies regarding the process for amendment of the Future Land Use Element and related to level of service and impacts on the Transportation Mobility System in areas outside Urban Cluster can be found in **Transportation Mobility Element Objective 1.2:**

OBJECTIVE 1.2 - Transportation Management Outside of Urban Cluster Mobility Areas

To protect and support agricultural activities, preserve the character of rural communities and encourage development in areas where infrastructure can be provided in a financially feasible manner, developments outside the Urban Cluster as identified in the Comprehensive Plan shall be required to mitigate directly impacted roadways and impacts to roadways within the urban cluster.

TME Policy 1.2.1 *Alachua County shall adopt the following minimum level of service standards based on peak hour conditions for functionally classified roadways in order to maximize the efficient use and safety of roadway facilities:*

<i>Mode of Travel</i>	<i>Level of Service (LOS)</i>
<i>Motor Vehicle – SIS*</i>	<i>B</i>
<i>Motor Vehicle – Multi-lane**</i>	<i>C</i>
<i>Motor Vehicle – Two lane Arterial</i>	<i>C***</i>
<i>Motor Vehicle – Two lane Collector</i>	<i>C</i>

** Strategic Intermodal System, Florida Department of Transportation*

*** Four or more through lanes*

**** LOS D for:*

SR 24 (Archer Road) from SW 91st to Levy County

SR 121 (Williston Rd) from SW 62nd to Levy County

SR 26 from NE 39th (SR 222) to Putnam County

CR 241 (NW 143rd) from NW 39th to City of Alachua

SW 122nd (Parker Rd) from SW 24th to SR 24 (Archer Rd)

The Levels of Service (LOS) Standards established in **TME Policy 1.2.1** are the LOS standards reviewed by in EASP transportation study detailed below.

C. Sector Planning and Comprehensive Transportation Planning Requirements

As an element of a Sector Plan Comprehensive Plan Amendment, Section 163.3245(3)a.3, F.S. requires:

A general identification of the transportation facilities to serve the future land uses in the long-term master plan, including guidelines to be used to establish each modal component intended to optimize mobility.

In addition to this statutory requirement, amendments to the Future Land Use Element of the Comprehensive Plan outside the Urban Cluster that would increase the demands on the existing transportation system must include transportation facilities and services to provide

mobility to and within the proposed uses. **Transportation Mobility Element Policies 1.2.5 and 1.2.6** deal directly with this requirement:

TME Policy 1.2.5 *Amendments to the [Future Land Use Element](#) and/or Map will be coordinated with the Transportation Mobility Element and the [Capital Improvement Element](#) through the evaluation of the impact of additional traffic projected to result from proposed land use plan amendments. This evaluation shall include assessment of the impact on the level of service of affected roads based on the roadway functional classification and number of lanes.*

TME Policy 1.2.6 *No amendment to the [Future Land Use Element](#) shall be approved where this evaluation indicates that the level of service on affected roads would be reduced below the adopted level of service standards. Under these circumstances, any amendment to the [Future Land Use Map](#) shall be accompanied by corresponding amendments to identify roadway modifications needed to maintain adopted level of service standards, as well as the scheduling of such modifications in Alachua County's Five Year Capital Improvement Program.*

The transportation analysis provided by the applicant is discussed below and details the projected impact on the level of service that would result from the EASP amendment. Staff reviewed this analysis in light of the above policies.

1. Envision Alachua Transportation Study Methodology

Staff and the applicant reached agreement on the transportation study methodology through a methodology letter and a series of meetings. The transportation study was submitted as an element of the data and analysis of the EASP application. The analysis of the transportation components of the EASP are related to the Employment Oriented Mixed Use Land Use category (EA-EOMU). This is due to the fact that the impacts of the development generated within the EA-EOMU category would be the largest deviation from the currently adopted Future Land Use categories for the subject properties. The transportation analysis also includes the potential transportation impacts from development of the Plum Creek owned properties that are proposed to be annexed into the City of Hawthorne and developed at a density consistent with Area “B” of the original EASP application from 2013.

a. Study Area

The study area for the transportation study included regionally-significant and major County roadways where the assigned project trips exceed five percent (5%) of the daily generalized

service volume at the roadway's adopted level of service (LOS). This is a standard service area derived from the FDOT Transportation Site Impact Handbook and is an industry standard used for reviewing developments which are likely to have regional transportation impacts. The applicant did choose to evaluate significance separately for the Envision Alachua Sector Plan and the proposed City of Hawthorne development area.

b. Horizon Year

The horizon/buildout year for the Sector Plan Comprehensive Plan amendment is 2070. During the original application methodology, it was determined that the applicant should utilize the 2035 Alachua County transportation demand model to simulate the impacts of the development in the proposed Sector Plan. The EASP transportation study used the 2035 Alachua County Cost Feasible scenario and network from the Alachua County 2035 transportation demand model. In order to provide a breakdown of near term and longer term impacts, the applicant provided analysis results for a projected 2030 partial buildout and 2070 full buildout of the EASP development program.

2. Envision Alachua Transportation Study Results

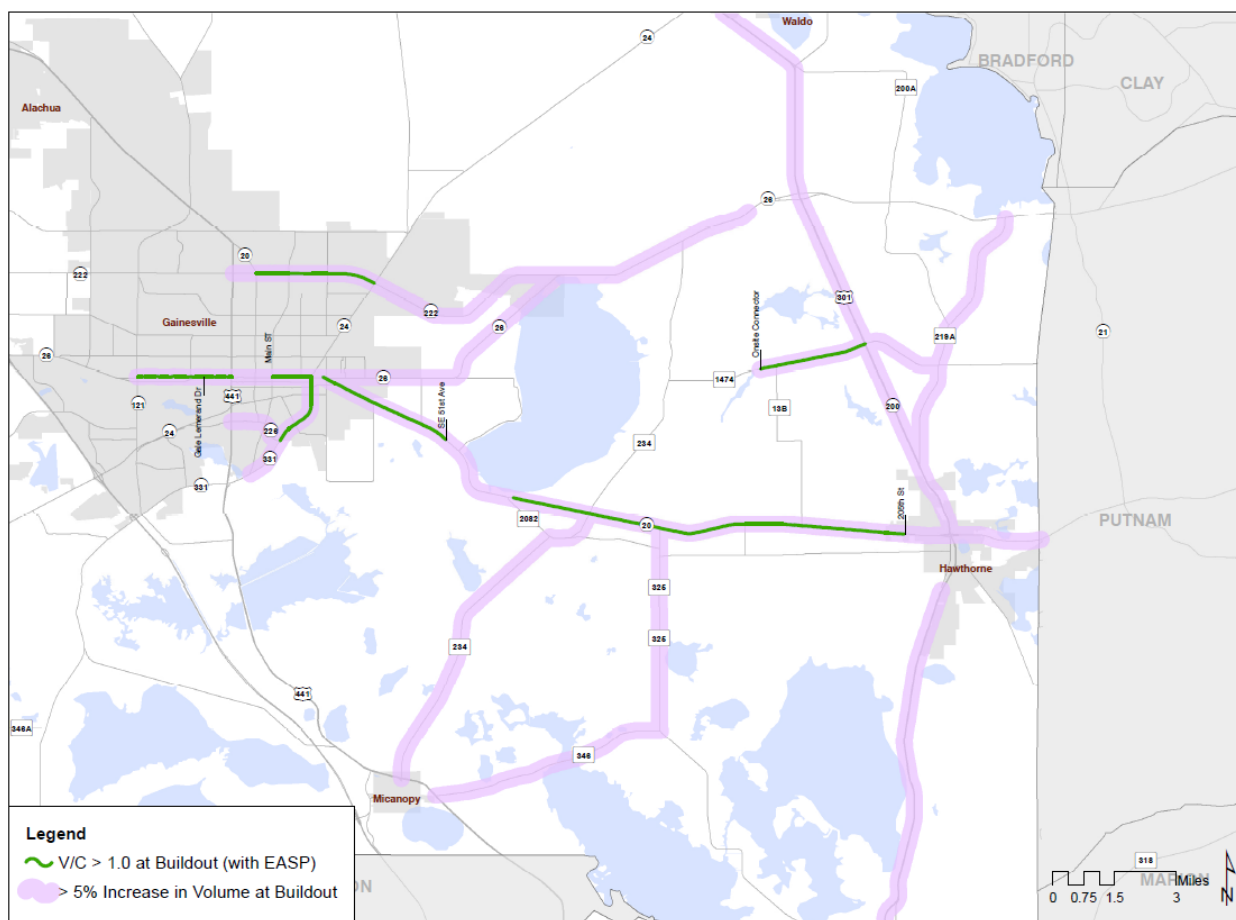
The applicant's transportation study provides the bulk of the data and analysis regarding the potential impacts of EASP amendment. The future roadway conditions are detailed in the study. Staff reviewed the study results in light of the TME Policy 1.2.5 and 1.2.6 described above. There are multiple roadways that would fall below their adopted level of service with the addition of project traffic without a specific policy or infrastructure investment. This is true both interim review of 2030 and to a greater extent in the projected buildout year of the 50 year Envision Alachua Sector Plan. The roadway segments projected to fail are detailed in Table 5 with the segments that fail due specifically to project traffic highlighted for emphasis.

TABLE 5. ROADWAYS WITH FAILING LEVEL OF SERVICE DUE TO PROJECT TRIPS

Roadway Segment		Future AADT without EASP	Future AADT with EASP	Percent Increase	>5% Increase?	Generalized Svc. Vol. at Adopted LOS	>5% and Exceeds Service Volume?
From	To						
SR 20							
SR 121	US 441/SR 20	53,460	54,779	2.5%	No	39,800	No
US 441/SR 20	SR 222/N 39th Ave	22,216	22,558	1.5%	No	32,110	No
Main St/SR 329	SR 24	30,509	35,930	17.8%	Yes	33,800	Yes
SR 24	SR 26	27,229	39,490	45.0%	Yes	53,445	No
SR 26	SE 51st	25,247	47,904	89.7%	Yes	39,800	Yes
SE 51st	CR 2082W	18,239	46,907	157.2%	Yes	49,600	No
CR 2082W	CR 325	17,372	46,196	165.9%	Yes	25,700	Yes
CR 325	205th St	15,377	27,530	79.0%	Yes	25,700	Yes
205th St	US 301	14,531	20,753	42.8%	Yes	52,400	No
US 301	Cherokee Dr	15,730	16,698	6.1%	Yes	52,400	No
Cherokee Dr	Putnam Co. Line	15,452	16,361	5.9%	Yes	25,700	No
SR 26							
SR 121/NW 34th St	Gale Lemerand Dr	38,792	41,067	5.9%	Yes	32,110	Yes
Gale Lemerand Dr	US 441/W 13th St	34,654	36,826	6.3%	Yes	33,800	Yes
US 441/W 13th St	Main St/CR 329	26,694	28,596	7.1%	Yes	33,800	No
SR 20	SE 51st Street	16,367	19,873	21.4%	Yes	65,600	No
SE 51st Street	SR 222	6,582	7,520	14.2%	Yes	24,400	No
SR 222	EASP N. Connector	9,854	13,807	40.1%	Yes	14,300	No
EASP N. Connector	US 301	9,649	5,774	-40.2%	No	14,300	No
US 301	Putnam Co. Line	10,599	10,986	3.7%	No	14,300	No
US 301/SR 200							
CR 325	S. Johnson Street	17,453	18,855	8.0%	Yes	25,700	No
SR 20	SE 223rd St	17,891	22,540	26.0%	Yes	40,700	No
SE 223rd St	SE 41st Ln	18,224	23,109	26.8%	Yes	40,700	No
SE 41st Ln	SR 26	15,372	20,353	32.4%	Yes	25,700	No
SR 26	NE 136th Ave	19,619	22,139	12.8%	Yes	25,700	No
SR 222							
NW 43rd St	SR 121/NW 34th St	42,826	44,076	2.9%	No	39,800	No
SR 121/NW 34th St	US 441/NW 13th St	31,344	32,262	2.9%	No	39,800	No
US 441/NW 13th St	SR 20	28,894	31,511	9.1%	Yes	39,800	No
SR 20	SR 24	37,882	41,263	8.9%	Yes	39,800	Yes
SR 24	Gainesville Airport	15,490	18,170	17.3%	Yes	39,800	No
Gainesville Airport	SR 26	7,138	10,567	48.0%	Yes	24,200	No

Roadway Segment		Future AADT without EASP	Future AADT with EASP	Percent Increase	>5% Increase?	Generalized Svc. Vol. at Adopted LOS	>5% and Exceeds Service Volume?
From	To						
SR 24							
SR 121/NW 34th St	SR 226/SW 16th Ave	80,503	82,751	2.8%	No	50,900	No
SR 20	SR 120/NW 23rd Ave	33,088	34,158	3.2%	No	41,790	No
SR 226/SR 24A							
SR 24	US 441/W 13th St	36,996	36,618	-1.0%	No	33,800	No
US 441/W 13th St	SR 329/Main St	30,221	31,771	5.1%	Yes	33,800	No
SR 329/Main St	SR 331/Williston Rd	9,876	12,298	24.5%	Yes	15,600	No
US 441/SR 25							
SR 226	SR 24	33,728	30,311	-10.1%	No	32,110	No
SR 331							
SR 121	US 441	31,870	33,280	4.4%	No	39,800	No
US 441	SR 329/Main St	27,266	28,525	4.6%	No	39,800	No
SR 329/Main St	SR 226	21,095	25,488	20.8%	Yes	39,800	No
SR 226	SR 26	28,217	35,227	24.8%	Yes	33,800	Yes
CR 234							
US 441	CR 2082	2,483	4,884	96.7%	Yes	8,400	No
CR 2082	SR 20	2,297	5,096	121.9%	Yes	8,400	No
SR 20	CR 1474	1,290	1,237	-4.1%	No	8,400	No
CR 325							
US 301	CR 346	2,292	1,426	-37.8%	No	8,400	No
CR 346	SR 20	2,128	4,420	107.9%	Yes	8,400	No
CR 346							
US 441	CR 325	1,003	1,796	79.1%	Yes	8,400	No
CR 219A							
US 301	CR 1469	2,563	5,796	126.2%	Yes	8,400	No
CR 1469	SR 26	2,436	5,493	125.5%	Yes	8,400	No
CR 1474							
Onsite Roadway	US 301/SR 200	91	13,094	14260.6%	Yes	8,400	Yes
US 301/SR 200	CR 219A	464	3,756	710.0%	Yes	8,400	No

The potential failing roadway segments are shown geographically in Map 18.



MAP 18. POTENTIALLY FAILING EXISTING ROADWAY SEGMENTS AT BUILDOUT OF EASP

The EASP application proposes several comprehensive plan policy responses to these projected level of service deficiencies. The proposed policy responses are discussed below.

3. Envision Alachua Transportation Mobility and Capital Improvements Policy Approach

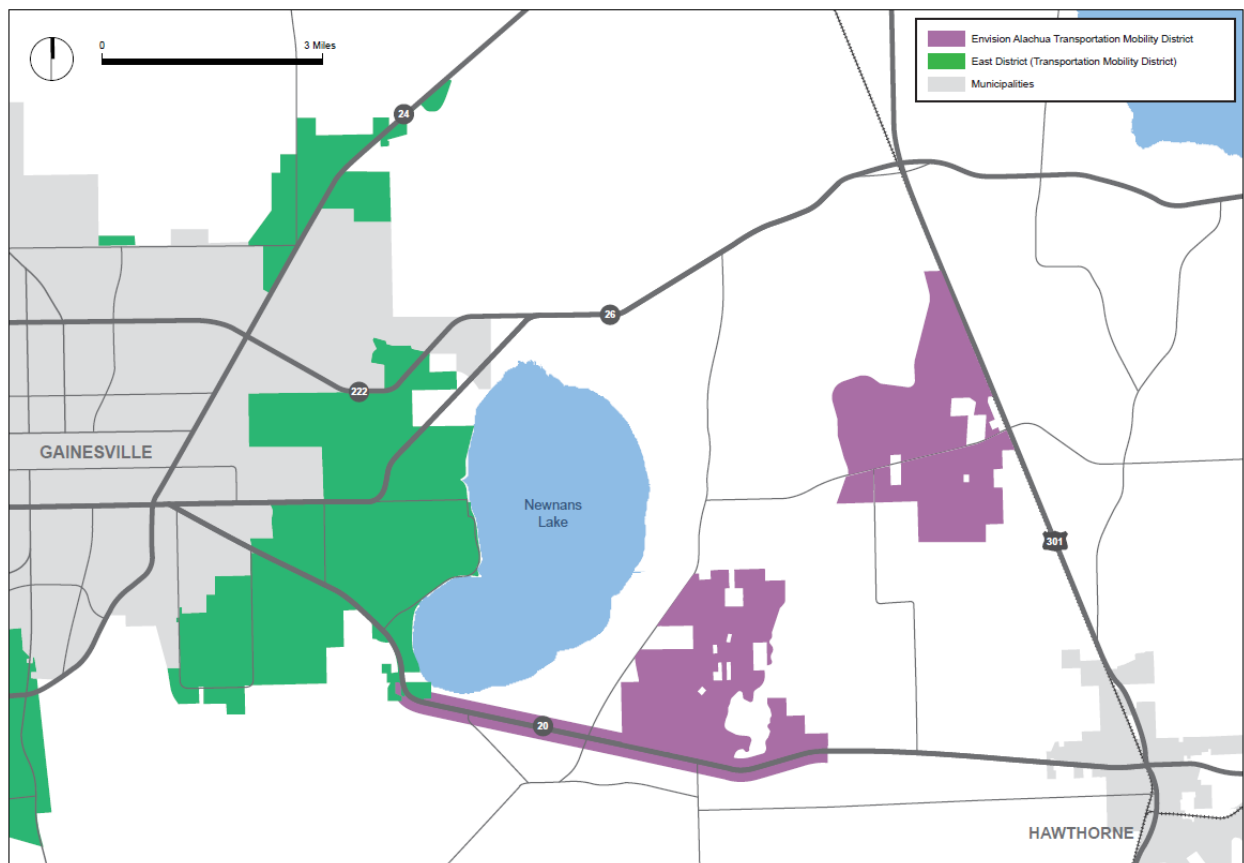
a. Level of Service

In response to the transportation study results that demonstrate multiple roadways failing to meet their adopted level of service with the adoption of project trips, the EASP proposes amendments to the Future Land Use Element, Transportation Mobility Element and Capital Improvements Element of the Comprehensive Plan. There are several policy responses to transportation that are proposed to deal with the proposed transportation impacts. The first of these is to designate an area corresponding to the proposed EA-EOMU land use category and portions of the Right of Way for State Road 20 as a Transportation Mobility District. This Transportation Mobility District is modeled after the Transportation Mobility Districts associated with the Urban Cluster in the adopted Comprehensive Plan.

The primary innovation of the Mobility District concept, as currently articulated in the Comprehensive Plan, was its utilization of multimodal level of service measures. As an element

of these multimodal levels of service, Transportation Mobility Districts utilize an areawide level of service for automobiles. Areawide level of service is a valid concept when there are parallel transportation facilities that can serve transportation demands, as there are existing and planned within the Urban Cluster. This gives travelers options to utilize parallel facilities when a corridor reaches congestion levels that are unacceptable to the traveler.

The areawide level of service concept has two primary issues when applied in the EASP. One issue is that internal to the EA-EOMU land use the need for collector roadway corridors spaced closely enough to provide a gridded roadway network conflicts with the ecological protection goals of the Comprehensive Plan. Depending on the final design of the development area, the construction of a functional gridded roadway network would produce significant disruption to ecological corridors and have impacts on the hydrology of the area. These impacts are discussed more fully **Section IV Natural Resource Protection Analysis** of this report. Secondly, the areawide level of service concept becomes problematic when applied to the major arterials that provide access to and from the EA-EOMU and the remainder of the community. A major issue with this proposal is that the applicant has proposed to include the segments of State Road 20 inside the Mobility District per Map 19.



MAP 19. ENVISION ALACHUA MOBILITY DISTRICT

Due to the presence of Newnan's Lake and other environmental constraints there is no potential for parallel facilities that can relieve State Roads 20 and 26 for the primary travel

demand pattern between Gainesville and the EA-EOMU area. The transportation study indicates that over 50% of the external project trips are using SR 20 for travel between the EA-EOMU and Gainesville. SR 20 and SR 26 are approximately 7 miles apart at County Road 234, the western boundary of the EA-EOMU. To truly provide for adequate parallel facilities to serve an urbanized population, parallel facilities would need to be spaced much more closely, on the order of one mile. This is not practical in the EASP portion of eastern Alachua County due to the presence of the natural boundary created by Newnan's Lake. Additionally the applicant proposes to reduce the level of service (LOS) for SR 20 from its currently adopted LOS "B" in a rural setting to a LOS "C" in urban setting.

b. EASP Impacts and Capital Improvement Planning

The applicable sector plan statute (Section 163.3245(3)a.3, F.S.) and Transportation Mobility Element Policies 1.2.5 and 1.2.6 require the identification of transportation facilities needed to serve the proposed development program in conjunction with the Future Land Use amendments that will produce the transportation demand. Additionally, funding sources need to be identified in order to apportion the costs of the needed infrastructure and any necessary transit services among the proposed development types.

There are multiple roadway segments which would be projected to not meet their adopted levels of service due to the addition of the EASP trips resulting from the EASP amendment. A subset of those roadway segments are those that fail with the addition of project trips and where project trips make up a significant portion of the maximum service volume of the roadway. The applicant has proposed **EASP Capital Improvements Element Table 4** in an attempt to address impacts on these roadways.

PART 3: PROPOSED AMENDMENTS TO THE CAPITAL IMPROVEMENTS ELEMENT

B. Addition of a new Capital Improvements Project Listing / Transportation, Table 4

TABLE 4: EASP Transportation Facilities Schedule of Capital Improvements,

<u>Project Name</u>	<u>Description</u>	<u>Funding Source⁵</u>	<u>FY 2016-2020¹</u>	<u>FY 2020-2035¹</u>	<u>EASP Buildout</u>
There are no programmed capital improvements required for Transportation Facilities within the FY 2016/2020 CIP for the EASP.					
<u>SR 20 Corridor & Gateway Design Concept Study</u>	<u>From the City of Hawthorne Limits to 5 Points Road</u>	<u>(3)</u>	<u>\$150,000⁴</u>		
<u>SR 20 Paratransit Service</u>	<u>Provide paratransit-type vehicles (15-18 passenger)²; 4 buses</u>	<u>(1)(2)(3)(5)(6)</u>		<u>\$392,000</u>	
<u>SR 20 Transit Service</u>	<u>Provide 6 buses (60 passengers per bus)³</u>	<u>(1)(2)(3)(4)(5)(6)</u>			<u>\$4,050,000</u>
<u>SR 20 from SE 27th Street to CR 325</u>	<u>Dedicated Transit Lanes / Additional 2 L; 7.5 miles</u>	<u>(1)(2)(3)(5)</u>			<u>\$39,257,161</u>
<u>CR 1474 from CR 20 Job Center connector to US 301</u>	<u>4L Urban; 2.5 miles</u>	<u>(1)(2)(3)</u>			<u>\$20,326,543</u>
<u>SR 222 from SR 20 to SR 24</u>	<u>Traffic signal retiming; 5 signals</u>	<u>(1)</u>			<u>\$25,000</u>
<u>SR 331 from SR 226 to SR 26</u>	<u>Traffic signal retiming; 6 signals</u>	<u>(1)</u>			<u>\$30,000</u>

¹ Construction Cost/Unit based on FDOT Cost Per Mile Models and engineering judgment. Signal retiming 'construction cost' includes engineering.

² Source: 2014 LYNX Transit Development Plan for paratransit-type vehicle plus 30% contingency.

³ Source: 2014 LYNX Transit Development Plan for 40-60 foot bus plus 10% contingency.

⁴ Estimated date, study will be completed within 12 months of the effective date of the first DSAP.

⁵ Funding Sources: (1) Multi-Modal Transportation Fee (Impact Fee / Mobility Fee / Proportionate Share); (2) Gas Tax; (3) Developer - means roadway constructed only in conjunction with a development; (4) Potential Partnership with Private Developers; (5) State & Federal - Potential Funds; (6) Fare Collections;

The majority of project traffic is projected to utilize SR 20 with dominate travel demand being that between the Envision Alachua/Plum Creek properties and the City of Gainesville. At buildout of the proposed development program, SR 20 would be operating at 191% of capacity at its currently adopted level of service. The applicant proposes a twofold approach to deal with this deficiency. In 2030, when the SR 20 would be projected to operate at 128% of capacity at its current adopted level of service, the applicant proposes that four paratransit type buses be purchased and an employer funded or flex type transit service be provided between the EASP and the City of Gainesville.

At the projected buildout of the development program, the roadway would clearly operate below its adopted level of service regardless of any transit or alternative traffic analysis. Table 4 proposes to increase the level of transit service as well as to widen SR 20 by two lanes. The additional two lanes are described as either being used as a dedicated transit facility or as two new general use motor vehicle lanes. It is unlikely that there would be sufficient transit demand to justify the additional two lanes on SR 20 as a dedicated transit facility due to the absence of the potential for transit supportive densities along SR 20 between Gainesville and the proposed EASP properties. The transition of SR 20 to a six lane general use motor vehicle facility would provide sufficient additional automotive capacity but the approach of widening arterials to six lanes is discouraged by the adopted Comprehensive Plan. Transportation Mobility Element Policy 1.1.6.3 details how the current adopted Transportation Mobility Districts prohibit the widening of arterials beyond six lanes.

Policy 1.1.6.3 With the exception of Interstate 75, roadways shall be limited to no more than a total of four (4) through motor vehicle lanes. All new bridges over Interstate 75 shall be four (4) lane roadways with provisions for transit, bicycle lanes, sidewalks and/or multi-use paths.

This policy is in keeping with the Comprehensive Plan goals of creating a gridded roadway network as opposed to the continual widening of arterial roadways beyond four lanes.

The proposals in Table 4 that detail a plan to retime signals to maintain level of service on SR 222 (NE/NW 39th Ave) and SR 331 (Williston Road) could have detrimental impacts on adjacent side street traffic. These side street impacts have not been fully analyzed to determine the overall network condition for these streets within the Gainesville urbanized area at the buildout condition.

The policy solutions in the EASP proposal to the impacts on the development EA-EOMU land uses are not consistent with the Comprehensive Plan's Mobility framework. The geographical and locational limitations of the proposed EA-EOMU properties would force the six-laning of a major state arterial roadway which is inconsistent with the Comprehensive Plan's guiding principles on mobility.

c. County Responsibilities LOS Mitigation

Proposed **EASP TME Policy 1.10.9** states that that the County should add projects to the Capital Improvements Element if the areawide level of service falls below adopted standards within the EA Mobility District.

Policy 1.10.9 LOS Mitigation

Should the Areawide LOS for motor vehicles within a Transportation Mobility District fall below adopted LOS standards, then the County shall as a part of its annual update to the Capital Improvements Element either identify additional motor vehicle capacity projects or increase peak-hour transit frequencies and provide off-peak transit service with at least 30 minute headways along Express Transit Corridors.

The TME has an existing similar policy for the Transportation Mobility Districts of the Urban Cluster, **TME Policy 1.1.6.6**. In the adopted Comprehensive Plan this policy plays the role of a “failsafe” since adequate capacity projects were added to the Capital Improvements Element coincident with the adoption of the Transportation Mobility District concept. The applicant is proposing additional facilities to mitigate the impacts of the proposed development, however, there is an additional proposed policy that may cause some portion of the cost of those facilities to be the responsibility of the County rather than the developers of the EASP. It is clear in proposes **EASP Policy 10.5.8**.

Policy 10.5.8 Infrastructure Financing

- a. All on-site infrastructure shall be funded by the developer, its successors and assigns. A portion of off-site infrastructure shall be funded by the developer, its successors and assigns as described in Policy 10.5.8.b.
- b. To ensure that the provision of adequate public facilities for the EASP, based on the level of service standards adopted in this Plan, avoids inequitable burdens on parties outside the EASP, the portion of the capital cost of public facilities and infrastructure incurred as a result of the impacts of developments within the EASP shall be funded by the developer, its successors and assigns, including, without limitation through establishment of one or more Community Development Districts (“CDD” formed in accordance with Chapter 190, Florida Statutes) or other appropriate non-general fund revenue source funding mechanisms as may be identified within each DSAP analysis for the provision of infrastructure.

Proposed **EASP Policy 10.5.8(b)** makes it clear that the EASP properties are only responsible for “a portion” of offsite infrastructure necessary for the construction of the EASP. This would include items such as the proposed six laning of SR 20. The traffic generated by the EASP will

utilize a majority of the new capacity on a six lane SR 20 but not the entirety of it. With the policy written as proposed, other funding sources would have to be identified to construct that project even though the modelling suggests this roadway would not need to be widened but for the construction of the EASP land uses. The proposed policy governing the EA area would have negative fiscal impacts on the County, because the County would be required by to fund the balance of any needed offsite infrastructure project that does not meet the strict legal nexus as defined by the applicant.

d. Transportation Mobility Mitigation and Funding

The applicant has proposed an EA-Mobility Fee in **EASP TME Policy 1.10.3** and a mechanism for Mobility Fee credit in **EASP TME Policy 1.10.4**.

Policy 1.10.3 EA-Mobility Fee

An EA Mobility fee shall be adopted to ensure that a development funds mobility and fully mitigates its impact to the transportation system.

- a. Development shall satisfy its transportation concurrency obligations through payment of the EA Mobility fee.
- b. No development shall receive a final development plan approval where the development impacts a roadway operating below the adopted LOS, except through the proportionate share ordinance or until such time as the EA Mobility fee is adopted that address the traffic impact of the development.
- c. Modes of transportation to be addressed by the EA Mobility fee shall be consistent with the modes identified in Policy 1.10.5.
- d. The EA Mobility fee should reflect the potential to reduce impact to the major roadway network through an increase in internal capture of trips and increase in pedestrian, bicycle and transit mode share.

Policy 1.10.4 EA Mobility Fee Credit

Developments within the EA-EOMU may receive EA Mobility fee credit for the construction of non-site related infrastructure, purchase of buses and funding of transit. Where the cost of the required improvements is greater than the EA Mobility fee, the Developer may seek reimbursement for the additional funds expended from a Community Development District (CDD) or future development projects within the EA-EOMU.

A Mobility Fee is similar to a Transportation Impact Fee. The County has used elements of the Mobility Fee concept previously in the formation of its Multi-Modal Transportation Mitigation program. Mobility Fees typically rely on the legal foundations for Impact Fees that have been expressed in case law over many years. In order to have a valid Mobility Fee program for the EASP, the County would have to determine the basis for the fee. The two traditional types of bases are either a development's consumption of capacity or a development's proportionate share of necessary improvements to mitigate growth as detailed in the Comprehensive Plan.

The County's existing MMTM relies on the latter of those two options. As stated previously, if the EASP is approved, there is offsite infrastructure that will be required to serve the development which could be deemed above and beyond the developers' responsibility due to the excess capacity that would be generated. This would require some portion of necessary infrastructure to fall outside the legal nexus required in the adoption of the Mobility Fee. Additionally it is not clear that the Plum Creek properties within the City of Hawthorne that would be contributing to the travel demand would also be participating in any adopted Mobility Fee.

e. Strategic Intermodal System (SIS) Impacts and State Road 20

The County's Mobility Plan Comprehensive Plan update of 2010 introduced a specific mitigation plan to deal with the State's SIS facilities that were within the Urban Cluster area. Proposed **EASP TME Policy 1.10.6** proposes to utilize this document for the mitigation of impacts to State Road 20 and US 301, the two nearby impacted SIS facilities.

Policy 1.10.6 SIS Facilities Levels of Service

The LOS for SIS facilities within the EA Mobility District shall be addressed through the Strategic Intermodal System (SIS) Mitigation Plan (Alachua County Growth Management Department January 26th, 2010). The SIS Mitigation Plan identifies mitigation measures such as the construction of parallel roadways serving similar travel demand patterns, dedicated transit lane(s), access management and transit service. Mitigation projects, consistent with the SIS Mitigation Plan, shall be included in the Multi-Modal Transportation Capital Improvements Program. The SIS Mitigation Plan may be amended, in consultation with FDOT, during updates to the Capital Improvements Element.

There is no data and analysis in the application detailing how the mitigation measures in the existing published SIS Mitigation Report would translate to the impacts associated with the Envision Alachua Sector Plan Comprehensive Plan amendment. As discussed previously, it is not practical to construct parallel facilities to either of the major SIS facilities. The construction of parallel facilities was a key factor staff negotiated with the Florida Department of Transportation when the County adopted the existing SIS mitigation framework. As also discussed previously six laning of SR 20 would be inconsistent with Mobility District framework which prohibits the expansion of roadways beyond four lanes except for Interstate 75.

Proposed **EASP TME Policy 1.10.7** introduces the concept of transitioning State Road 20 to an Urban Facility.

Policy 1.10.7 Transportation – SR 20 Transition to an Urban Facility

The County recognizes that the EA-EOMU will develop in an urban development form along SR 20 and will work with FDOT to transition the SIS facility designation from a rural facility to an urban facility consistent with the timing of that urban development. A SR 20 Corridor & Gateway Design Concept Study shall be completed by the developer within 12 months of the effective date of the first DSAP. When appropriate, the existing SIS Mitigation Plan (Alachua County Growth Management Department January 26, 2010) may be amended, in consultation with FDOT, to reflect the change in land use character along SR20.

FDOT has a statutory mandate to protect the function of the SIS to provide for the movement of people and freight. Transitioning to an urban facility would decrease the emphasis on vehicular and freight throughput and would have the practical impact of increasing travel times on this major facility due to the increased levels of congestion due to EASP traffic.

D. Other Transportation Policy Issues

1. Urban Cluster and Consistency with Comprehensive Plan structure

Principle 3 of the **Transportation Mobility Element** of the Comprehensive Plan expresses one of the overriding rationales for the Urban Cluster.

PRINCIPLE 3

DISCOURAGE SPRAWL AND ENCOURAGE THE EFFICIENT USE OF THE URBAN CLUSTER BY DIRECTING NEW DEVELOPMENT AND INFRASTRUCTURE TO AREAS WHERE MOBILITY CAN BE PROVIDED VIA MULTIPLE MODES OF TRANSPORTATION

The proposed EASP amendment would be generally inconsistent with this principle and its subsequent policies. The Urban Cluster is in close proximity to the employment opportunities within the City of Gainesville and is connected through an existing and planned gridded roadway network. Additionally, recently adopted policies regarding Traditional Neighborhood Development (TND) and Transit Oriented Development (TOD) have led to increased infill opportunities in close proximity to the existing and planned gridded network where goals for rapid transit service are attainable.

Recently approved development applications in the Celebration Pointe TOD, Santa Fe Village TOD and the Springhills TOD contain considerable residential and non-residential development potential within the Urban Cluster that will be served by rapid transit funded by the development through the MMTM and Transportation Improvement District programs.

2. Suitability of EASP Property for Urban Development

Staff has provided analysis in other sections of this report on the relative unsuitability of large portions of the EA-EOMU area for urban and suburban scale development. The location of the subject property in relation to existing urban areas and the natural resource protection requirements and hydrology of the subject property have a particular impact on the ability of any development on this property to be truly urban in scale with a gridded transportation network that is consistent with multimodal mobility goals of the Comprehensive Plan and Sector Plan requirements.

3. Impacts on Other Regionally Significant Transportation Infrastructure

Section 163.3245(3)a 4, F.S. also requires that Sector Plans identify “other regionally significant public facilities necessary to support the future land uses.” The North Central Florida Strategic Regional Policy Plan identifies, in Chapter V of the plan, regionally significant transportation infrastructure. In addition to all of the State Roads and US Highways previously mentioned, the Strategic Regional Policy Plan also identified the Gainesville Regional Airport, a Strategic Intermodal System facility, and the CSX rail line running along US 301 from the Bradford County

Line to the Marion County Line as regionally significant transportation facilities. The applicant provided no data and analysis about the potential impacts of the Envision Alachua Sector Plan on these facilities.

E. Conclusions of Transportation Analysis

Staff's analysis of the proposed Envision Alachua Sector Plan and associated comprehensive plan amendment above can be distilled into the following general conclusions:

1. The proposed amendment's application of an areawide level of service is inappropriate due to physical and environmental constraints of the land making the construction of parallel transportation capacity impractical and ecologically inadvisable.
2. The proposed amendment would cause multiple elements of the transportation network to fall below their adopted levels of service.
3. The policy solutions to the transportation deficiencies are not appropriate and are inconsistent with Urban Mobility District policies relating to the prohibition on new six lane arterial roadways.
4. The proposed amendment would have negative fiscal impacts on the County due to the need to provide for and maintain new capital transportation infrastructure and transit service to meet community level of service goals that would be not be necessary except for the development of EASP but fall outside the legal nexus of a Mobility Fee.
5. The proposed Mobility Fee does not require mitigation of Plum Creek properties which are being annexed into the City of Hawthorne.
6. The proposed amendment is generally inconsistent with **Transportation Mobility Element Principle 3** and its associated policies. The proposed amendment would have negative impacts on higher density infill and redevelopment within existing communities which are more readily served by transit, walking and biking.
7. The EA-EOMU is generally unsuitable for construction of an urban gridded multimodal transportation network due to its location and restrictions imposed upon development impacting sensitive natural resources.

VI. Public Facilities and Services Analysis

A. Summary of Public Facilities and Services Analysis

The estimated public facility costs, including a delineation of when facilities will be needed, the general location of the facilities, and projected revenue sources to fund the facilities are required by state statute (Section 163.3177(3)(a), F.S.) at the comprehensive plan amendment stage. The applicant has provided data and analysis and proposed some policies that specify the needed public facilities, the cost and the timing. Most of the specifics and funding source determination is put off until the DSAP stage however. All of the public facilities and infrastructure needed as a result of a proposed development should be identified, including timing and funding, in the Capital Improvements Element at the time of the proposed comprehensive plan amendment. These needed facilities and costs, especially future costs to the County should be part of the capital improvements planning in order to be properly assess the true impacts of the proposed future urban land uses in the EASP prior to designating those uses on the Future Land Use Map that would greatly increase the allowable densities and add new commercial and industrial uses to this rural area. Analysis of these facilities was based on a phasing of development throughout the fifty year plan, though no policies are proposed to require that phasing other than proposed **EASP Policy 10.3.4.1 b.** that states that *No development activity can occur within the US 301 Job Center before 2030*. There is a general jobs-to-housing balance policy (proposed **EASP Policy 10.2.6.3**) that would require measurement of jobs to housing within each DSAP but this in no way limits the amount of development within each DSAP. As long as the 2.5 jobs per residential unit balance is being met, based on the proposed policies, the entire SR 20 Job Center could be developed in any timeframe, which would include 7,000 housing units.

B. General Public Facilities and Services Analysis

1. Proposed Policies

Proposed **EASP Policy 10.3.1** EA-EOMU Development Program lists the maximum development program of 8,700 residential units and 11.2 million square feet of non-residential uses and includes a note that facilities to serve the community including schools, government services, and utilities shall be provided as needed. There is a Public Facilities Needs analysis included with the application that analyzes water and sewer, solid waste, schools, Fire/EMS, solid waste and recreation needs. This analysis identifies deficiencies in water and sewer (there is no central water and sewer in the area; homes and other uses in this area such as farms are served by well and septic), Fire/EMS, schools infrastructure and potentially recreation. However, as detailed below, there are issues with the analysis, in the case of schools, or with the potential financial liability of the County in the future. The data and analysis supplied by the applicant was not translated into policy in a manner that would allow the County Commission to consider

the total impact of the provision of these public facilities and services. The public facilities capital improvement amendments are found in Tables 4 and 5 of the Capital Improvements Element changes in the applicant's proposed text (Appendix 1) and Section 3 of the application. Transportation Improvements have been provided with various funding sources through buildout of the application. The proposed table of scheduled capital improvements for Water and Sewer facilities includes improvements through 2020 and is based on an assumption of no population prior to 2020, though there are no policies proposed to support this. No stormwater, Fire/EMS, Recreation or Solid Water improvements have been proposed. Developer funding for a Recreation Master Plan, but no specific facilities, has also been proposed. The following public facilities financing policies have been proposed for any needed infrastructure.

[Proposed EASP]Policy 10.5.8 Infrastructure Financing

- a. All on-site infrastructure shall be funded by the developer, its successors and assigns. A portion of off-site infrastructure shall be funded by the developer, its successors and assigns as described in Policy 10.5.8.b.(emphasis added)
- b. To ensure that the provision of adequate public facilities for the EASP, based on the level of service standards adopted in this Plan, avoids inequitable burdens on parties outside the EASP, the portion of the capital cost of public facilities and infrastructure incurred as a result of the impacts of developments within the EASP shall be funded by the developer, its successors and assigns, including, without limitation through establishment of one or more Community Development Districts ("CDD" formed in accordance with Chapter 190, Florida Statutes) or other appropriate non---general fund revenue source funding mechanisms as may be identified within each DSAP analysis for the provision of infrastructure. (emphasis added)
- c. The CDDs, or other appropriate funding mechanism, shall be established in conjunction with the approval of each DSAP.
- d. A developer's agreement shall be entered between the County and developer of the site prior to approval of a Development Plan, addressing details of the development-phasing schedule and the level of the funding commitments of the CDDs, or other appropriate funding mechanisms.
- e. For the purpose of this Policy, the term "public facilities and infrastructure" includes the following: (1) water and water supply systems, (2) stormwater management systems, (3) roads, (4) transit system, (5) sewer and wastewater systems, (6) recreation facilities (7) schools (8) fire, emergency operations, EMS and Police, and (9) restoration and management of wetlands, uplands and ecological features.

[Proposed EASP] OBJECTIVE 10.6 – IMPLEMENTATION

The DSAPs implement the LTMP by providing specific requirements regarding the development program, design standards, and public infrastructure impacts and requirements, as defined by FS 163.3245. Each DSAP shall guide conservation and development activities in the portion of the Planning Area to which it applies and shall be prepared consistent with the Objectives and Policies of provided herein, Section 402.134 of Article 20 of the ULDC, and FS 163.3245.

[Proposed EASP] **Policy 10.6.4** DSAP Minimum Requirements

All DSAPs required to implement the approved LTMP shall be processed as a Planned Development rezoning, as outlined in Article 14, Rezoning, Planned Development District, of the ULDC (§403.17). In addition, each DSAP shall also provide the following: ...

- f. Adequate Infrastructure Review that includes:
 - i. Identification of the facilities necessary to meet the adopted levels of service for infrastructure as adopted in the Comprehensive Plan.
 - ii. An analysis describing the timing, location, and design of proposed
 - iii. capital improvements required to meet the adopted levels of service for infrastructure as adopted in the Comprehensive Plan.
 - iii. An amendment of the Capital Improvements Element to adopt the capital improvements required to meet the adopted levels of service for infrastructure as adopted in the Comprehensive Plan.
- g. Recreation Master Plan. For any DSAP within the EA---EOMU that includes residential uses, the DSAP shall include a Parks and Recreation Master Plan that establishes an urban standard of service for the residential portions of the EA---EOMU. The Master Plan will identify the necessary capital improvements, the source of funding for capital construction and on---going management and shall include an improvements phasing plan that is coordinated with the construction of residential development within the EA- -- EOMU and shall address the following:
 - i. Parks program overall at build---out.
 - ii. Establishing standards for determining the location of future parks within the EA---EOMU or adjacent EA---CON or EA---RUR which specifically address accessibility to residences, adjacencies to any proposed school locations, ability of the location to address recreation programming changes over time, parking, utilities, long---term maintenance and how the park will interact with any environmental constraints of the location.

- h. Adequate Provision of Public Schools that includes:
- i. Identify the facilities necessary to mitigate the impacts of the future residential land uses on public schools;
 - ii. Require that each DSAP include an amendment of the Capital Improvements Element and the Alachua County School Board's 5--year district facilities work plan to adopt the capital improvements necessary to mitigate the impacts on public school facilities;
 - iii. Require that future school sites designated in the DSAP be suitable for development as a public school and be served with the necessary infrastructure, such as water, sanitary sewer, electrical power, high---speed internet service and transportation facilities and that they are consistent with the public school siting provisions of this Plan and the Interlocal Agreement for Public School Facility Planning; and
 - iv. When it is not possible to avoid soil conditions on a public school site that would require remediation in order to permit vertical construction, such remediation will be included in the applicant's capital improvements plan for mitigation of the impacts on public schools.
- i. Financing of Infrastructure. Each DSAP shall demonstrate the adequate funding of infrastructure as required by Policy 10.5.8 for each phase of each development and shall identify the financial strategy to construct and maintain all required infrastructure.

[Proposed EASP] **Policy 10.6.6** Infrastructure Financing Minimum Requirements

The County reserves the right to deny a DSAP if adequate funding is not available for the necessary infrastructure to support the proposed development, or require as a condition of the approval of development that adequate funding sources be identified and programmed.

[Proposed EASP] **Policy 10.6.6.1** Capital Improvements Element Future Amendment to Meeting adopted levels Of services

All projects, timing/phasing and financing mechanisms for capital projects required to meet the adopted levels of service for public facilities as adopted in the Comprehensive Plan shall be included as part of the annual update of the Capital Improvements Program (CIP) and Capital Budget as they are identified for funding/construction within the current 5 Year Capital Program. Prior to development approval for any phase or portion of the EASP, the county shall amend its Capital Improvements Element to include the timing and funding of public facilities required by the DSAP for that phase or portion

of development. This provision shall not be construed to require the contribution of County funds for the construction of any capital improvement project.

Proposed **EASP Policy 10.6.6.1** would leave the County Commission no discretion in adopting amendments to the CIP as it requires the County Commission to amend the CIP prior to development plan to include the timing and funding of public facilities needed by a DSAP. This means that the County Commission adopts the Long-term Master Plan (the comprehensive plan amendment) and then the Planned Development for the property prior to amending the CIP.

There are no policies being proposed with this amendment that specify which public facilities will be needed, when, and at what cost beyond the initial 5-year time frame (through 2020) except for transportation projects. By proposing a policy that states that the developer will pay the cost of the on-site infrastructure and a portion of the off-site infrastructure but not having proposed any policies that specifically describe the full needed facilities, or the cost and timing of those facilities, it is impossible for the County to determine what the financial liability for the County would be in approving this proposed amendment. The EASP is separated by private properties and distance that new infrastructure would have to cross. This would be off-site. The six-laning of SR 20 is needed because of this development according to the applicant's analysis. SR 20 is entirely off-site of the EASP. While project traffic causes a need for additional lanes on this road it would not consume that entire additional capacity. According to proposed **EASP Policy 10.5.8** above, only the portion attributable to this development would be paid for by the applicant. This would place a substantial financial burden on the County, even though the road would not need new capacity but for this proposed development. The fact that the County has policies against six-laning roadways is another issue and discussed further in the transportation analysis. Another issue with these policies is that by proposing to determine the needed infrastructure at the DSAP stage, the ability to plan and budget for overall public facility needs in a coordinated manner would be eliminated. As discussed further in Section VII. *Statutory Requirements for Comprehensive Plan Amendments and Sector Plans* of this staff report, the estimated public facility costs, including a delineation of when facilities will be needed, the general location of the facilities, and projected revenue sources to fund the facilities are required by state statute (Section 163.3177(3)(a), F.S.) at the comprehensive plan amendment stage. This is the only way to ensure that a determination of what the public facility needs are and what those total estimated costs would be for the developer and for the County is considered prior to any decisions being made on adopting these proposed amendments into the Comprehensive Plan.

2. Public Schools Coordination and Capacity

a. Summary

The application includes an analysis of public school capacity and needs associated with the residential development proposed in the application that identifies projected deficits at buildout in public school capacity at the elementary, middle and high school levels. A series of tables with data and analysis were provided by CHW with the application focusing on three time frames (2016-2020; 2030 and 2070) but these incorrectly use capacity in adjacent school concurrency areas in the analysis. For purposes of long-range planning, only the adopted school concurrency service area where residential development in the EASP would be located should be used, as discussed in depth in the section below on “Analysis of Public Schools Coordination and Capacity.”

Although the detailed analysis of Public School Facility needs provided with the application overstates the capacity in the area relevant to where the Plan amendment is proposed and therefore understates potential need for projected student stations, the text of the analysis identifies a projected ultimate need for additional public schools at buildout, stating: “The ACPS CIP will not likely be available until fall, but the presented need will likely match previous ACPS projections and planning figures... indicat[ing] that three (3)* elementary schools, one (1) middle school, and one (1) high school will be required to support the proposed 8,700 dwelling units.” (CHW, p. 29). (*Note that on the previous page it is stated that “ACPS staff has advised Plum Creek representatives to include two elementary school sites.” (CHW, p.28)) Based on the generalized facility costs per gross square feet and square footage per different school types from the Florida Department of Education cited in the CHW data and analysis, the estimated capital costs associated with these needs would be \$20.68 million per elementary school, \$38.16 million per middle school and \$35.295 million per high school. (Based on information provide in Table 8: Projected Public School Facility Costs, CHW, p. 28.)

The proposed **EASP Policy 10.5.4.2** addressing public school facilities capital improvement needs which indicates there is no projected need for the 2030 time period is based on the incorrect planning analysis of the capacity for the relevant planning area for the period through the year 2030, as well as assumptions regarding phasing or timing of residential development which are not provided for in the proposed policies. In addition although there is some discussion in the data and analysis about potential provision of land by Plum Creek for needed new public school facilities, the amendment proposed by the applicant does not translate this into policy, through for example a Capacity Enhancement Agreement which is what the County’s Comprehensive Plan and the Interlocal Agreement for Public School Facility Planning identify as a means of addressing such long range planning needs.

Policies proposed in the EASP relating to funding which include references to potential funding sources such as “Educational Facilities Benefit Districts”, “a portion of off-site infrastructure...to

be funded by the developer as a result of impacts of development within the EASP”, potential Community Development Districts, and statements that “this... shall not be construed to require the contribution of County funds for any capital improvement projects” do not paint a clear picture of how the capital costs of needed new public school facilities will ultimately be addressed.

The proposed new **EASP Policy 10.5.4** would provide for public and educational facilities to be “allowable uses in the EA-EAMU future land use category” “in addition to the locations provided for in Policy 5.3.7.” of the adopted Future Land Use Element. In the County’s Comprehensive Plan public schools are recognized as “an allowable use” in urban residential land use areas located within the Urban Cluster, and as “conditional uses” in other land use categories. The County Plan identifies several areas that “shall be avoided when locating future educational facilities”, including among others, areas designated for Rural/Agriculture land use, existing or designated industrial districts, and “any area where the nature of existing or proposed adjacent land uses would endanger the safety of student or decrease the effective provision of education.” Future Land Use Element Objective 5.3 of the County Plan identifies several factors to be considered relative to compatibility of schools with other uses, adequacy of transportation facilities, consistency of school sites with natural resource protection policies, and the Public Schools Facility Element, Policy 1.1.4, “Criteria for Land Use Decision”, provides for the School Board to address similar considerations in evaluating land use decisions. There is no analysis provided within the EASP application relating to such considerations of suitability for location of schools.

b. Analysis of Public Schools Coordination and Capacity

The first Goal of the Public School Facilities Element (PSFE) in the Comprehensive Plan is for the County to collaborate with the School Board on public school capacity planning, and Objective 1 and related policies of the PSFE details the processes for coordination on land use planning decisions, such as comprehensive plan amendments, with the School Board’s long range public school capacity planning. (This goal and related objectives and policies focusing on long range comprehensive planning decisions are in contrast to Goal 2 of the PSFE and related objectives and policies which focus on capacity in the near term and decisions on final development orders to ensure that adequate capacity is available to meet the regulatory requirements associated with concurrency.) As provided in Policy 1.1.3 of the PSFE, the School Concurrency Service Areas (SCSAs)- established in the Interlocal Agreement For Public School Facility Planning (ILA) between the School Board and the County- are the “Geographic Basis for School Capacity Planning”. Both this policy and Section 6.3 of the ILA provide that these SCSAs “shall be used for school capacity planning” and “*for purposes of this planning assessment, existing and planned capacity in adjacent concurrency service areas shall not be considered.*” (Emphasis added)

The Comprehensive Plan and ILA call for assessment of school system capacity and students anticipated to be generated as a result of comprehensive plan amendments both in terms of the impact on the school system as a whole and on the applicable SCSAs for the elementary, middle and high school levels, which in the case of this comprehensive plan amendment is the Hawthorne CSA. This issue was discussed with School Board staff and consultant, and CHW, in connection with the analysis submitted for the application by Plum Creek in 2014, and the final version accompanying the June 2014 version of the Plan Amendment application by Plum Creek included an assessment that was generally consistent with the capacity assessment requirements of Section 6.3 of the ILA. Section 4, pp. 22-29 of “The Public School Facility Analysis” prepared by CHW for Plum Creek and submitted with the most recent revised plan amendment application does not focus on the long range planning assessment requirements called for by the PSFE and ILA in connection with comprehensive plan amendments. Instead the analysis of Public School facility needs starts (on p. 22) with a section headed “Alachua County Public Schools (ACPS) Concurrency Standards” which refers to the policies in the County’s Comprehensive Plan on how “the concurrency requirement may be satisfied”. CHW’s report quotes Policy 1.3.2 of the Capital Improvement Element of the County’s Comprehensive Plan (mirroring Policy 2.4.6 of the PSFE) which defines the “concurrency availability standard” for use in reviewing applications for final development orders, rather than comprehensive plan amendments. As required by Florida Statutes relating to Public School Concurrency this policy provides that final development orders may not be denied based on concurrency requirements where adequate school facilities will be in place or under construction within three years as provided in the School Board’s Five Year District Facilities Work Program, or adequate school facilities are or will be available in an adjacent SCSA within 3 years as provided in the School Board’s Five Year District Facilities Work Program.

Assessing existing and planned public school capacity in the School Concurrency Service Area where a comprehensive plan amendment is located as called for by the Public School Facility Element and Interlocal Agreement provides the opportunity for the School Board and affected local governments to identify and address long range capital facilities planning needs for public school facilities in proximity to area impacted as part of the comprehensive planning process. However, the data and analysis included in the CHW report starts instead with “2014-15 Public School Program Capacity” which includes as “available capacity” all of the schools in several SCSAs including the East Gainesville CSA, and Waldo CSA as well as the Lincoln and Bishop CSA’s for Middle School, in addition to the Hawthorne CSA in which the proposed East Alachua Sector Plan is located, and shows “available capacity” in these schools of 895 at the Elementary level, 698 at the Middle School level, and 982 at the High School level. The available capacity shown in the table for the schools that are in just the Concurrency Service Area in which the Plum Creek proposal is located is just 204 for Shell Elementary; -31 for Hawthorne Middle School and 263 for Hawthorne High School. (The text on p. 25 of the CHW report notes the absence of capacity numbers from ACPS at the time of the report taking into account changes such as the closing of Waldo Community School, its respective CSA, and modifications to Duval Elementary

within the East Gainesville CSA.) The subsequent “Public School Facilities Level of Service Evaluation-Identification of Public School Facility Needs” (Section 4.4. starting on p.27 and “Table 7A: 2016-2020 Projected Public School Facility Needs” and “Table 7b: 2030 Projected Public School Facility Needs” and “Table 7C: 2070 Projected Public School Facility Needs”) uses this program capacity for the schools in multiple concurrency services areas (although there is some inconsistency in the tables, perhaps due to a transcription error, which shows “available capacity” at the Elementary School level of 995, while Table 6 shows 895). Based on an assumption of 2,200 new residential units through 2030, Table 7B shows a projected student generation of 267 at the Elementary level, Middle School student generation of 131, and generation of 181 students at the High School level (p. 27 citing “Alachua County Public Schools, May 2015” as source); Tables 7B then indicates that based on current (as of May 2015) available capacity of 995 at Elementary Level, 698 at Middle School level, and 982 at High School level, no additional “required schools” or “required acres” for schools are needed through 2030.

Based on buildout through year 2070 there are 8,700 new residential units proposed. There will also be a need to take into account the impact of the Hawthorne Plan Amendment, which proposes 800 new residential units, on Public School Capacity needs in the eastern part of Alachua County. There are currently no plans included in the School Board’s adopted capital plans to provide new public school capacity in the Hawthorne School Concurrency Area.

The CHW report includes various information in tables and text about needed new capacity and costs. Table 7.C of the CHW report on p.28 identifies a need for 2 new Elementary Schools, 1 new Middle School, and 1 High School to provide adequate capacity; text on p. 28 of the CHW analysis notes various changes underway such as closure of Waldo and modification of Duval and states “ACPS staff still project that the EA-EOMU development program will require two additional (2) elementary schools, one (1) additional middle school, and one (1) additional high school to support the proposed 8,700 dwelling units, as noted in their review of the 2015 EASP development program.” In Section 4.5 “Capital Improvement Needs”, the CHW report says: “From the School Boards Report, ‘Plum Creek is seeking approval... [t]he project proposes 10,500 single-family entitlements... ACPS staff has reviewed the proposal and has advised Plum Creek representatives to include two elementary school sites, one middle school site, and one high school site in the development plans.’ This projection remains accurate and was confirmed in last May 2015.” (CHW, p. 28) Then on p. 29 of the CHW Public Facilities report it states that “Based on existing student capacity and enrollment data, Tables 3A though (sic) C indicate that three (3) elementary schools, one (1) middle school, and one (1) high school will be required to support the proposed 8,700 dwelling units. More specific projections will be possible once ACPS publishes revised student capacity data that reflects ...plans to close the Waldo Community School and Duval Elementary School.” This analysis does not appear to take into account the proposed 800 residential units in the former area of the Sector Plan now proposed to be annexed into Hawthorne.

Table 8 on p.28 of the CHW Public Facilities Analysis identifies “projected public school facility costs per Gross Square Feet based on “Average # of Student Stations” and “Average Gross Square Foot (GSF)” citing the Florida Department of Education New Construction Report, Calendar Year 2013; Facility Costs per GSF of \$188, \$159 and \$181 for Elementary (110,000 GSF), Middle (240,000 GSF), and High (195,000 GSF) Schools respectively are shown. By County staff calculations this translates into capital costs of \$20,680,000 per Elementary School, \$38,160,000 per Middle School, and \$35,295,000 per High School. Table 8 also indicates O&M Costs per GSF of \$4.87, citing FDOE, Annual Plant Maintenance and Operations Cost Information, Alachua County, 2013-2014 as source, which provides an indication of the funding needs that will be associated with providing additional public school capacity and operations to serve the proposed new development.

Proposed policies dealing with school facilities include **EASP Policy 10.5.4.2 (a.)** on Public School Facilities Capital Improvements (p.57) which includes a table “2030 Preliminary List of Capital Improvements” which says “None projected” for Public Schools (and lists “Educational Benefit District and Proportionate Share Funding” as “Possible Funding Sources”). Policy 10.5.4 on Public School Facilities (p.56) calls for “ongoing dialogue and coordination to be established with the Alachua County School Board to plan for adequate facilities based on anticipated growth within the area” and states that “the preferred option for providing public schools for residents shall be the existing facilities currently serving the area that have available capacity first and providing additional school locations and facilities second” , and that “public and private educational facilities shall... be an allowable use in the EA-EOMU future land use category.” Proposed **EASP Policy 10.5.4.1** on Public Schools Facilities Intergovernmental Coordination on p. 57 addresses Intergovernmental Coordination related to “timing and location of capital improvement projects... through the DSAP process.”

Proposed **EASP Policies 10.6.4.h.** address requirements for Detailed Specific Area Plans (“DSAPs”) relating to “Adequate Provision of Public Schools”. DSAPs would be considered by the County as a Planned Development Rezoning, based on an application at some point subsequent to approval of the Sector Plan amendment to the Comprehensive Plan. The proposed policies call for the DSAP to “identify the facilities necessary to mitigate the impacts of future residential land uses on schools” and “include an amendment of the (County’s) Capital Improvements Element and Alachua County School Board’s 5-year district facilities work plan to adopt the capital improvements necessary...”, and also address public school siting requirements for “future school sites designated in the DSAP”, and remediation of soil conditions where required. Given the lengthy time horizon associated with site selection for new public schools, the need to coordinate school locations with infrastructure such as roads and potable water and wastewater facilities, the process for obtaining authorization from the State to construct new public schools, some additional framework for addressing the public school facility needs, such as a “capacity enhancement agreement”, should be considered. Financing of infrastructure is also addressed in proposed **EASP Policy 10.6.4.i.**, which cross-

references the requirements of proposed **EASP Policy 10.5.8** that provides for “a portion of off-site infrastructure” to “be funded by the developer...as a result of the impacts of developments within the EASP... .” Proposed **EASP Policy 10.6.6.1** elaborates on the required amendments to the Capital Improvements Element, which includes statement that “this... shall not be construed to require the contribution of County funds for any capital improvement project.”

Some concerns with the proposed policies include: the Table “2030 Preliminary List of Capital Improvements” under proposed **EASP Policy 10.5.4.2** stating that for Public Schools there are “none projected”, which is apparently based on the flawed data and analysis in the CHW report that is not consistent with the requirements of the County’s Public School Facility Element (PSFE) and the implementing Interlocal Agreement for Public School Facilities Planning between the School Board, the County and nine municipalities, which state that adjacent School Concurrency Service Areas are not to be considered for long-range planning assessments. The analysis provided by the applicant includes capacity not just in the Hawthorne School Concurrency Area in which this proposed comprehensive plan amendment is located, but adjacent concurrency service areas including the area encompassing Waldo Elementary and the East Gainesville and other concurrency service areas including schools west of Newnans Lake and as far west as NE 15th Street and 39th Ave. (Rawlings Elementary School), NE 9th St and NE 16th Ave. (Bishop Middle School), SE 15th St (Lincoln Middle School).

In addition, the assumption of 2,220 new residential units through the year 2030 is not consistent with the maximum of 7,000 new residential units that would be allowed in the SR 20 Job Center (proposed **EASP Policy 10.3.3.1**) as there is no policy with a timing provision limiting development approvals to after 2030 as there is for the SR 301 Job Center. Additional concerns with the proposed policies include the lack of mention of “Capacity Enhancement Agreements” which the PSFE and ILA encourage as a means of addressing long range needs, and deferral of this issue to Detailed Specific Area Plans. There is also discussion in the data and analysis, and with School Board staff, potential provision of land by Plum Creek for needed new school facilities, but this is not translated into policy. There are also questions relating to the consistency of proposed general proposed **EASP Policy 10.6.6.1** stating that it “shall not be construed to require the contribution of County funds for any capital improvement project” on the one hand, and on the other hand the listing of “Educational Benefit District” in the table under proposed **EASP Policy 10.5.4.2. (a)** as a possible funding source, along with “proportionate share funding” which by its terms would cover only a portion of needed facilities. Input from the School Board is needed on the siting criteria as called for under Section 6.4 of the ILA in relation to various provisions of proposed **EASP Policy 10.6.4.h.** including things such as remediation of soil conditions, and considerations relating to compatibility of potential school site and facility locations within the EOMU mixed land use category which could include various commercial and industrial land uses.

Alachua County School Board comments are located in Appendix 7. The School Board noted the issues with the improper use of adjacent school concurrency areas for planning purposes and the need for Capacity Enhancement Agreements between the developer, the School Board and Alachua County. The School Board's analysis, based on the applicant's breakdown of residential units and timing, found a need for two elementary schools, one middle school and possibly one high school to address the potential need caused by this development. The School Board also noted that any school sites should satisfy the Alachua County Public School specifications and meet the siting criteria established by the Interlocal agreement." Finally, the School Board comment's concluded with the statement that this proposed Comprehensive Plan amendment "does not adequately capture the specifics of the above recommendations with regard to the number and general location of school sites nor the process for implementation."

c. Proposed EASP New Policy on School Location as an Allowable Use in EA-EAMU

The proposed EASP application proposes to add the "EA-EAMU future land use category" to the Future Land Use categories within which public and private educational facilities would be "allowable uses":

Proposed **EASP Policy 10.5.4** Schools "In addition to the locations provided for in Policy 5.3.7, Future Land Use Element, public and private educational facilities *shall also be allowable uses* in the EA-EAMU future land use category." (italics added)

Adopted Future Land Use Element Policy 5.3.7(a) provides for public educational facilities as allowable uses in areas designated on the Future Land Use Map for urban residential land use designations located within the Urban Cluster, and as conditional uses in activity centers, institutional areas outside the urban cluster, and other land use categories. This adopted policy and others under Future Land Use Element Objective 5.3 regarding schools are based on general principles in the Comprehensive Plan regarding location of urban uses and public facilities and considerations regarding different types and levels of schools and their compatibility with other uses, appropriate transportation facilities (e.g. paved public roads) from which access to and from schools should be provided, consistency of school sites with natural resource protection policies in the Conservation and Open Space Element, colocation to the extent possible with other public facilities such as parks, libraries and community centers, linkages by bicycle and sidewalks with surrounding residential uses, and health/ safety considerations.

Areas that "shall be avoided when locating future educational facilities" are identified in adopted Future Land Use Element Policy 5.3.1 and include noise attenuation areas, environmentally sensitive areas, areas designated for Rural/Agriculture land use, existing or designated industrial districts, and "any area where the nature of existing or proposed adjacent land uses would endanger the safety of students or decrease the effective provision of

education.” There is no analysis provided with the EASP relating to these kinds of considerations for location of schools in connection with the suitability or basis for identifying public schools as “an allowable use” within the proposed new “EA-EAMU” Future Land Use category. This proposed land use category would provide for a wide range of uses including Industrial uses, and is proposed to be designated on the Future Land Use Map for an area which, as detailed elsewhere in this staff report, is lacking in key urban infrastructure, such as urban transportation facilities and services, potable water and wastewater disposal and treatment facilities. The lack of such an analysis and basis for this proposed **EASP Policy 10.5.4**, which would be the basis for future decision making by the School Board and the County on the planning and location of new public school facility capacity, is significant given the identification in the supporting data and analysis provided with the EASP application (in section V of the application material) of deficits in school capacity relative to new student stations needed for projected demand associated with the new residential units proposed as part of the EASP.

3. Potable Water and Sanitary Sewer Facilities

The water and wastewater data and analysis “Technical Memorandum” from Water and Air Research submitted with the application dated June 17, 2015 identifies a need for new potable water and sanitary sewer public facilities to serve the proposed development in the planning area. The overall estimate of the cost of these needed potable water and sanitary facilities at buildout is identified in the application as approximately \$27 million for the water supply and treatment and approximately \$67 million for the wastewater facilities, though this number does not include costs for the distribution system within the EASP. Maps provided in the memorandum show potential location of water treatment facilities (p. 109 Water & Wastewater Data and Analysis) and wastewater treatment facilities (p. 29 of memorandum). The distribution lines would have to run through environmentally sensitive areas based on these maps, including through the Lochloosa Creek area proposed for Preservation land use.

The application contains tables in the proposed Future Land Use Element (**EASP Policy 10.5.2.2 and Policy 10.5.2.3**) that are labeled 2030 Preliminary List of Capital Improvements and contain three columns each, “Project Name/Description” “Estimated Project Cost” and “Possible Funding Sources” It is unclear what this policy would require the applicant to construct or finance. There is also a proposed Capital Improvements Element table *Table 5: EASP General Infrastructure Facilities Schedule of Capital Improvements* that contains Project Description, FY Projects and Funding Source through 2020. This table is clearer as to what is required by the applicant. One issue with this proposal (and most of the other infrastructure analyses) is this analysis also uses the population projections based on 2,200 residential units being constructed from 2020 to 2030 and there is no policy that would require that only 2,200 units be constructed within this timeframe.

Proposed **EASP Policy 10.5.2 (Potable Water and Sanitary Sewer Centralized Services)** states that there will be connection to a centralized sanitary sewer system for services by FDEP permitted wastewater treatment plants. Conservation and Open Space Element Policy 4.6.16 in the currently adopted Comprehensive Plan requires that advanced waste treatment with nutrient removal must be specifically addressed in the policies for the protection of groundwater and surface water quality. Proposed **EASP Policy 10.5.2** could allow package sewage treatment plants (facilities), which are prohibited by Alachua County Potable Water and Sanitary Sewer Element Policy 2.1.6. The data and analysis provided by the applicant does not appear to be proposing a package treatment facility. The policies that were proposed as a result of that data and analysis are not clear on that issue.

Proposed **EASP Policy 10.4.3.3** that states that wastewater shall be treated as a resource...for capture of treated wastewater for reuse and groundwater recharge is problematic if a package treatment facility is used. Package sewage treatment facility effluent has higher nutrient concentrations, potentially making reuse or wetland treatment of reclaimed water a water quality concern. Larger centralized wastewater treatment facilities have higher treatment capabilities, which equates to lower nutrient levels in the reclaimed water. Again, the data and analysis and the proposed Table 5 in the Capital Improvements Element do not appear to be planning on use of package treatment facilities but the policies do not reflect this however.

4. Recreation Facilities

The data and analysis of Recreation facilities provided by CHW reviews basic policies adopted in the Alachua County Comprehensive Plan relating to Recreation Level of Service Standards for activity-based recreation and resource-based recreation. These standards establish minimum level of service standards of “0.5 acres of improved activity-based recreation sites per 1000 persons in the unincorporated area of Alachua County” and “ 5.0 acres of improved resource-based recreation sites per 1000 persons in the unincorporated area of Alachua County”, which is established by Policy 1.1.2 of the Recreation Element.

The CHW Public Facilities analysis states that the Workshop Staff Report identified issues associated with the required Data & Analysis for Recreation as follows:

- The estimated public facility costs, including a delineation of when facilities will be needed, the general location of the facilities, and projected revenue sources to fund the facilities are required by state statute (Section 163.3177(3)(a), F.S.) at the Comprehensive Plan Amendment stage;
- The County currently does not have planned public recreation within this area of the County; and

- The County's recreation master plan did not consider a potential population proposed in the Amendment within this rural area of the County.

The CHW Public Facilities analysis states that "The current Alachua County Parks Master Plan was completed in 2002 and was prepared by HHI. The Master Plan provided for 8 parks planning sectors for which specific measures were created. The sector" that includes the lands owned by Plum Creek was programmed as a rural area under the Parks Master Plan." It then goes on to say, "Given that the County has been slow to implement the recommendations identified in this Master Plan, it has been determined that the 2002 Plan provides a sufficient framework to guide the County for the foreseeable future in the urban areas." (CHW, p. 12).

The CHW Recreation Facility analysis also provides a Table (Table 4, p.11 of CHW's analysis), below, showing the following inventory of recreation facilities in the eastern portion of unincorporated Alachua County, the "Eastern Alachua County" and "Hawthorne Park Planning Districts" that were analyzed as part of the 2002 County Parks Master Plan.:

Table 4: Existing Alachua County Park Facilities

Activity-Based Parks	Acres	Resource-based Parks	Acres
Copeland	5	Earl P. Powers	12.47
Grove Park	4.32	Lake Alto	22.33
Gainesville/Hawthorne Rail Trail	195.6	Lochloosa Park	1.1
Total Activity-based Parks	204.92	Melrose Boat Ramp	0.25
		M.K. Rawlings	12
		Owens-Illinois Park	21.57
		Santa Fe Lake Park	24.98
		Waldo Canal	10.15
		Gainesville/Hawthorne Rail Trail	± 20
		Total Resource-based Parks	124.85

Based on this inventory and the existing population estimate of 8,067 "in the study area", and using an additional projected population of EA-EOMU population of 4,840 residing in an additional 2,200 residential units assumed to be built during the years 2020-2030, the CHW recreation facility analysis concludes: These planning boundaries currently have a surplus of activity- and resource-based parks. As seen in Table 4A, by 2030, the EASP development will require 2.24 and 22.4 acres of activity- and resource-based facilities, respectively. This additional demand is well within the area's available facility capacity." (p.16, CHW) Then, based on an assumption of buildout of 8,700 total new residential units through 2070 within the SR20 and CR301 Jobs Centers, corresponding to a population of 19,140 at buildout, the CHW analysis identifies a Total Need EA-EUMO recreation need of 105.27 acres, "include[ing] one Trail (minimum 20 acres) and one Regional Park (minimum 180 acres" (CHW, Table 5.C.1), and assuming no change in other population in the area, indicates "residual capacity" of 191 activity

based recreation acres, and a deficit of 11 acres of Resource Based Capacity. (CHW, Table 5.C.2, p. 16)

This CHW analysis bases population projections on an assumed residential unit count of 2,200 between 2020 and 2030. There is no policy basis for this assumption. The SR 20 Job Center can have up to 7,000 residential units according to proposed **EASP Policy 10.3.3.1** without limitation in policy for when those units may be built (other than a jobs-to housing balance policy which means if you built all 7,000 units at once you would build all the non-residential as well). This 2,200 unit assumption is used throughout the public facilities analyses. It may or may not be a reasonable assumption but it has no basis in policy. The proposed policies do provide for \$100,000 of developer funded money to be provided for a Recreation Master Plan for the SR 20 Job Center in FY 2017 and \$100,000 of developer funded money in 2019 for a Windsor-Hawthorne Mixed Use Trail Concept Study (Proposed Table 5 in the Capital Improvements Element). Proposed **EASP Policy 10.6.4.g.** states that each DSAP that includes residential uses will have a Parks and Recreation Master Plan that establishes an urban standard of service and identifies necessary capital improvements, the source of funding for capital construction and on-going management, and shall include a phasing plan coordinated with the residential development. Alachua County currently has a recreation impact fee that was not based on the potential of a “new town” with a population of 19,140 people in an area lacking urban recreational infrastructure. The fee may not cover new recreational needs for such a “new town” that has a 50 year uncertain time horizon for buildout. It is unclear what the cost would be to the County to provide recreational infrastructure meeting the Comprehensive Plan’s level of service standards. The County has adopted Recreation Element Policy 1.1.2 that states *The County shall adopt and maintain, at a minimum, the following level of service standards for recreation: (1) 0.5 acres of improved activity-based recreation sites per 1000 persons in the unincorporated area of Alachua County; 92) 5.0 acres of improved resource-based recreation sites per 1000 persons in the unincorporated area of Alachua County. The level of service standards shall consider the location of the site and the population within the service areas for the park types, as set forth in Table 1 of this Element* (see Appendix 5 Recreation Element Table 1). This table titled Recreation Site Classification for Alachua County lists types of parks needed based on location, size and population. This table could be used by Plum Creek to plan for recreation needs at this stage.

5. Fire and Emergency Services

The applicant has proposed several Policies that address Fire and Emergency Medical Services Protection.

[Proposed **EASP**] **Policy 10.5.6 Police, Fire and Emergency Medical Services Protection**

To provide adequate police, fire and emergency medical services protection to meet the needs of the EASP, the DSAP process shall ensure that new development shall meet all

of the requirements for adequate facilities based on the level of service standards adopted in this Plan.

[Proposed **EASP**] **Policy 10.5.6.1** Public Safety Intergovernmental Coordination

The timing and location of capital improvement projects shall be coordinated through the DSAP process for each phase of development with the appropriate public safety agencies and departments. A copy of each DSAP application shall be provided to each of these agencies. The DSAP shall include an analysis describing the timing, location, and design of proposed capital improvements required to meet the adopted levels of service for infrastructure as adopted in the Comprehensive Plan.

[Proposed **EASP**] **Policy 10.5.6.2** Public Safety Capital Improvements

a. 2030 Capital Improvements Program

To accommodate the projected EASP development through 2030 the following preliminary list of capital improvements has been identified to meet the adopted levels of service for general public safety services as adopted in the Comprehensive Plan.

2030 PRELIMINARY LIST OF CAPITAL IMPROVEMENTS		
<u>Project Name/Description</u>	<u>Estimated Project Cost</u>	<u>Possible Funding Source(s)</u>
<u>Windsor Volunteer Fire Department, St. #30</u> <u>Conversion to full station with EMS</u> <ul style="list-style-type: none"><u>New vehicle truck and EMS</u><u>New Station</u>	<u>±\$2M building</u> <u>±\$0.35M vehicle</u>	<u>Impact Fees, MSTU</u>

b. 5 Year Capital Improvements Program

All projects, timing/phasing and financing mechanisms for capital projects required to meet the adopted levels of service for general public safety services as adopted in the Comprehensive Plan shall be included as part of the annual update of the Capital Improvements Program (CIP), and Capital Budget as they are identified for funding/construction within the current 5 Year Capital Program.

Proposed **EASP Policy 10.5.6** establishes that the EASP is required to meet adopted level of service standards for Fire and EMS services as part of the DSAP process. The Policy identifies the level of service as that “adopted in this Plan.” Policy 1.2.1(c) of the Capital Improvement Element identifies fire and EMS as Category “C” public facilities. For Category “C” facilities, the County has adopted level of service guidelines that are for advisory purposes only according to Policy 1.2.5 of the CIE. Therefore, since these are only guidelines, it is not clear that any fire protection enhancements would be proposed to serve the EASP. As written, the Policy has the

potential to allow substantial urban-type development in an area that has limited fire response times.

Existing guidance documents for Fire/EMS service delivery for the County include the Fire and EMS Performance Update produced for the Board in 2012. This document built on the Fire/EMS Services Master Plan produced for the County in 2004. In the area of the EASP, the Update identifies one new station in the vicinity of the SR 20/CR 234 intersection. No other fire or EMS improvements are proposed by the Update east of Newnan's Lake³¹. The Update did not anticipate the development of the EASP.

The applicant has provided an analysis of the Fire and EMS improvements required to support the needs of the development based upon the level of service guidelines for development in the Urban Cluster. According to the analysis, County Staff have indicated that the Grove Park Station (or a station at the SR 20/CR 234 intersection) would be sufficient to provide coverage for the SR 20 Job Center and the US 301 Job Center. Additionally, the conversion of the Orange Heights Rescue station to a full fire/rescue station could also provide appropriate response levels for the US 301 Job Center.

With somewhat of a deviation from the recommendation from staff, the applicant proposes to upgrade the existing Windsor Volunteer Station 30 to a full station with EMS prior to 2030. This improvement is forecasted to cost \$2.35 million for vehicle and building costs with an additional \$1.5 million in capital costs for personnel equipment. For buildout, the development is proposed to require the expansion of the Orange Heights Rescue Station #8 and the establishment of a new station, either at the Grove Park site or at a new site closer to the SR 20/CR 234 intersection. These two projects combined have a capital cost of \$4.75 million for buildings and vehicles and \$2.7 million for personnel capital costs, according to the applicant.

Based upon the development scenario submitted with the application Staff generated a rough estimate of fire impact fees generated by the development with the following assumptions:

- The current fire impact fee of \$76 per 1,000 sq. ft. of new development stays in effect;
- Single family residential units have a maximum of 2,600 sq. ft.;
- Multi-family units have 1,000 sq. ft. each; and
- All non-residential development is subject to the fee.

Using these assumptions the development would be anticipated to generate approximately \$430,000 in fire impact fees by 2030 if the development proceeds in accordance with the Fiscal

³¹ Although the Fire and EMS Performance Update identifies the movement of Station 25 from Grove park to Hawthorne as an improvement, this has already been done by the County.

Impact Analysis Model. If the slightly different scenario included in the Fire/EMS Facility Analysis is used, the development would generate approximately \$471,200. In either case, these amounts fall well short of the required \$3.85 million required prior to 2030.

For buildout the development is anticipated to generate approximately \$2.15 million in total fire impact fees. Based upon information included in the Fire/EMS Facility Analysis, the total capital cost to support the development would be \$11.3 million. This leaves a gap of nearly \$8.85 million dollars.

The sole improvement proposed within the Policies is the improvement of the Windsor Volunteer Station. The funding sources identified for enhancement of this facility are impact fees and MSTU. These are the same funding sources the County has available today for capacity enhancement. To date, the County has not utilized the MSTU to develop new stations. Further, as noted above, the impact fees generated by the development are not sufficient to cover the full cost of a new Station. However, if the County were to elect not to develop the improvement, it is unlikely the County could stop development because the Policy 10.6.6 only references *infrastructure necessary to serve the development*. If fire facilities only have advisory guidelines instead of standards it is questionable whether that infrastructure is truly 'necessary.'

6. Fiscal Impact Analysis Model

In order to address the question of the County's potential monetary liability in providing urban infrastructure and public services to the proposed development, the applicant has provided a Fiscal Impact Analysis Model (FIAM) to support the proposed Sector Plan comprehensive plan amendment. In addition to the Envision Alachua Sector Plan, the FIAM provides analysis of a related development within the City of Hawthorne. The results from the proposed to be annexed portion of the development are not considered in this section of the staff report. Instead, only that portion in the unincorporated area has been reviewed.

The FIAM utilizes existing County demographic and fiscal data to analyze the potential impacts a new development could have on the County's capital and operational funding. The FIAM attempts to estimate the future cost of providing existing service levels to the proposed development. To do this, the FIAM evaluates the County's current expenditures for its services. In addition, the FIAM provides an analysis of anticipated County revenues based upon ad valorem taxes and other revenues. Expenses for services necessary to serve the development are related to the number of full time residents, the number of full time employees, the number of temporary visitors, or a combination of these factors. This review of the FIAM covers two areas, generally: Operating Revenue and Expenditures and Capital Revenue.

a. Operating Revenue and Expenditures

Appendix Table 6 of the FIAM report is a summary of the input variables used in the FIAM. For the purposes of analysis, the FIAM has assumed that the build-out of the Envision Alachua Sector Plan will occur in equal increments each year, beginning in 2021 and ending in 2072. Thus, approximately 2 percent of each development category is programmed each year. Appendix Table 6 of the FIAM includes a variable for property value growth rate and for inflation. The FIAM assumes that residential property values will increase at a rate of 1.5% while non-residential properties will increase at a rate of 2.0%.

Although not included in the report submitted by the applicant, staff understands that the FIAM also assumes that the cost of providing the existing County services would grow by 1.5% each year, with an underlying assumption that this will be sufficient to fund existing services at their current level. However, as evidenced by the County's reduction in positions and programs in the recent past, it is not clear that the cost of providing services will grow at the same rate as revenue. Generally, the County's annual increase in cost of providing services has exceeded the growth of revenues necessary to support those services. As an example, the cost of maintenance of roadway infrastructure has been demonstrated to have exceeded the revenues available for this service. Thus, it is likely that revenue projections in excess of service costs, as provided in the FIAM, are overly optimistic.

The applicant's analysis also presumes that the County will continue to provide services at existing levels, and that new development will not create the need for new or expanded services. This is an unlikely presumption. As an example, the development of large-scale industrial uses may change the type of fire apparatus or training necessary to support the development. Also, the FIAM assumes that the cost of providing existing services to the proposed development will not exceed the cost of providing those services to existing development.

There are several factors, however, that are not considered in the FIAM model that would contribute to higher cost of service provision to development within the Envision Alachua Sector Plan. One factor is the location of the proposed sector plan. Providing services to this currently-rural location would be substantially more expensive than providing services within the Urban Cluster where the infrastructure already exists. A second factor affecting cost of service provision is that given the speculative 50 year time horizon, there is a strong possibility that full buildout of this development will not happen as assumed with the FIAM. A less than full buildout scenario would make service provision more expensive because the services would still have to be provided but the revenue would be much less than assumed in the model.

b. Capital Revenue

The FIAM indicates that the development will generate \$116,310,344 in transportation mitigation revenues over the 50-year project timeframe. The report indicates that the calculation of this revenue is loosely based on the existing adopted Multi-modal Transportation Mitigation for the Mobility Districts of the Urban Cluster. Although the proposed **EASP TME Policy 1.10.3** requires adoption of an “EA Mobility Fee,” the amount of the fee is not identified. Within the Urban Cluster, the MMTM is based upon the cost of improvements identified in the Capital Improvements Element that are necessary to support the growth of VMT over the planning horizon. The table proposed as Table 4 identifies only \$64,423,704. Thus, it is unlikely that, if an EA Mobility Fee is adopted, it would create revenues as shown in the FIAM.

The FIAM indicates that the development will generate \$2,173,600 in fire impact fees. As identified in the analysis of Fire and Rescue Services, above, the capital costs of a single fire station are likely to exceed the projected revenues generated through impact fees. As an example, Fire Rescue Station 17, the most recently constructed new facility, cost approximately \$1,600,000 in 2008. Current estimates for capital apparatus costs for a new fire rescue station are approximately \$1,000,000, including a rescue unit and a fire truck. Thus, based on best available estimates, total capital costs for a new fire rescue station and apparatus would be approximately \$2,600,000 in current year dollars. Additionally, the full amount of impact fee revenue would not be available to the County until build-out of the development, *i.e.*, in 50 years. This means that, in the short term, the County would be required to fund some portion of a station.

The FIAM, on Page 5, states that, “if additional fire stations are required to serve the new development, it is assumed that these facilities will be funded through increased impact fees, special assessments or special district financing..” However, for fire and rescue services the applicant has identified only two funding sources in proposed **EASP Policy 10.5.6.2**. Those two funding sources are Impact Fees and MSTU. Since impact fees are based on the rational nexus test it is unclear whether the applicant will provide the full funding necessary to support fire and Emergency Medical Services service for the development if the capital costs for these services exceed anticipated impact fee revenue. In addition, capital expenditures like a fire station must be built up-front though the impact fees will be collected over time and only entirely collected if the development reaches full build-out. The upfront cost of building a station has the potential to be a substantial financial burden on the County.

C. Conclusion of Public Facilities and Services Analysis

Section 163.3177, F.S. and the County’s Comprehensive Plan require that public facilities and infrastructure needed as a result of a proposed development should be fully identified, including timing and funding, in an amendment to the Capital Improvements Element at the time of the proposed comprehensive plan amendment.

The applicant has analyzed necessary infrastructure and costs for the build out of the project but then based the proposed policies on an assumed number of residences constructed per year without including policies that would prescribe phasing of the development in this manner. Through 2030 2,200 residential units are assumed in many of the infrastructure analyses. The proposed CIE amendments include necessary infrastructure for water and sewer through 2020. Only the transportation capital improvements amendments includes facilities through buildout of the EASP. Fire/EMS, schools, and stormwater and solid waste, though analyzed by the applicant, have no proposed capital improvement policies associated with them.

In addition, proposed **EASP Policy 10.5.8(b)** makes it clear that the EASP properties are only responsible for “a portion” of offsite infrastructure necessary for the construction of the EASP. As an example, this would include items such as the proposed six laning of SR 20. The traffic generated by the EASP will utilize a majority of the new capacity on a six lane SR 20 but not the entirety of it. With the policy written as proposed, other funding sources would have to be identified to construct that project even though the modelling suggests this roadway would not need to be widened but for the construction of the EASP land uses. The proposed policy governing the EASP area would have negative fiscal impacts on the County, because the County would be required to fund the balance of any needed offsite infrastructure project that does not meet the strict legal nexus as defined by the applicant.

The application includes data and analysis that show that additional fire stations will be needed to serve the proposed development. The funding sources proposed are Impact Fees and MSTU. Since impact fees are based on the rational nexus test it is unclear whether the applicant will provide the full funding necessary to support Fire and Emergency Medical Services service for the development if the capital costs for these services exceed anticipated impact fee revenue. In addition, capital expenditures like a fire station must be built up-front though the impact fees will be collected over time and only entirely collected if the development reaches full build-out.

The EASP proposes an areawide level of service for automobiles within the Envision Alachua-Employment Oriented Mixed Use (EA-EOMU) Land Use Category. Areawide level of service is unsuitable in the case of the EASP due to relatively remote location of the EA-EOMU land use and the challenges of constructing a gridded multimodal transportation system on property with significant areas of wetlands, floodplains and other sensitive ecological features. The policy response in the EASP application is not appropriate to address the projected level of service deficiencies identified by the applicant.

As detailed in the Transportation Analysis section, the addition of capital improvements to the transportation system proposed in the EASP amendment would either be insufficient to mitigate the impacts of the proposed development or would not be consistent with goals for a gridded transportation network. Adoption of the proposed amendment would undermine the

mobility goals of infill and redevelopment of existing municipalities and the Urban Cluster as expressed within the structure of the Comprehensive Plan.

The application includes an analysis of public school capacity and needs associated with the residential development proposed in the application that identifies projected deficits at buildout in public school capacity at the each level but uses adjacent school concurrency areas in the analysis. For purposes of long-range planning, only the adopted school concurrency service area where residential development in the EASP would be located should be used. There are no policies proposed to provide for a Capacity Enhancement Agreement with the School Board as suggested by the ILA and the Public School Facilities Element of the County's Comprehensive Plan.

These CIE amendments should include the full extent of facilities needed, including proposed funding sources, as part of the Long Term Master Plan comprehensive plan amendment process as the plan for infrastructure provision is an important component of consideration of the overall proposed Envision Alachua Plan. Infrastructure and service provision is one of the largest expenditures of Alachua County government and must be available for adequate consideration of a project of this size and impact. Though the applicant has analyzed the potential impacts on public facilities and infrastructure from buildout of this development, that analyses has not been appropriately translated into policy that staff can recommend supporting to the County Commission.

VII. Statutory Requirements for Comprehensive Plan Amendments and Sector Plans

Proposed **EASP Policy 10.1.3** Envision Alachua Long Term Master Plan (General) states that the proposed policies for the Envision Alachua Sector Plan address requirements of state law. The list in this proposed policy found below is a general description of the items required by Section 163.3245(3) (a) 1-7, F.S.:

- a. Future Land Use designations contained on a Framework Map;
- b. Water supply;
- c. Transportation;
- d. Regionally significant facilities;
- e. Regionally significant natural resources;
- f. General development principles and guidelines; and
- g. General procedures and policies to facilitate intergovernmental coordination.

These criteria have been discussed throughout the staff report in the sections specific to the topic. These criteria will be discussed in more detail below. This statutory provision begins by saying *In **addition to the other requirements of this chapter**, except for those that are inconsistent with or superseded by the planning standards of this paragraph, a long-term master plan pursuant to this section must include maps, illustrations, and text supported by data and analysis to address the following: [1-7].* (emphasis added) The “other requirements of this chapter” is referring to the other requirements in Chapter 163, F. S. for comprehensive plan amendments. Sector plan long-term master plans are proposed comprehensive plan amendments. These general requirements for comprehensive plan amendments are primarily found in Section 163.3177, F.S., *Required and optional elements of comprehensive plan; studies and surveys*. The relevant provisions of this statute are outlined and analyzed below.

Florida Statutes Section 163.3177(f) All mandatory and optional elements of the comprehensive plan and plan amendments shall be based upon relevant and appropriate data and an analysis by the local government that may include, but not be limited to, surveys, studies, community goals and vision, and other data available at the time of adoption of the comprehensive plan or plan amendment. To be based on data means to react to it in an appropriate way and to the extent necessary indicated by the data available on that particular subject at the time of adoption of the plan or plan amendment at issue. (emphasis added)

The proposed Envision Alachua Sector Plan is not consistent with this requirement for comprehensive plan amendments. The proposed infrastructure policies except transportation are not inclusive of the whole project. There is a potential substantial cost for local government to provide services and infrastructure above the need “caused by the development” though the infrastructure would not be needed but for the development. The data also shows that this area of the County is environmentally sensitive containing all of the conservation qualities listed in the Alachua County Comprehensive Plan including wetlands and protected plant and animal habitats. The applicant has not provided adequate data or analysis that supports how and where they wish to locate most of this proposed development’s intensity and density in relation to these natural resources. In fact, the SR 20 Job Center is the most environmentally sensitive and wet area of the 5,555 acre EOMU yet it is proposed to contain most of the proposed development. The applicant has not reacted in an appropriate way to the data they have collected for this application.

Florida Statutes Section 163.3177(3)(a) *The comprehensive plan shall contain a capital improvements element designed to consider the need for and the location of public facilities in order to encourage the efficient use of such facilities and set forth:*

- 1. A component that outlines principles for construction, extension, or increase in capacity of public facilities, as well as a component that outlines principles for correcting existing public facility deficiencies, which are necessary to implement the comprehensive plan. The components shall cover at least a 5-year period.*
- 2. Estimated public facility costs, including a delineation of when facilities will be needed, the general location of the facilities, and projected revenue sources to fund the facilities.*
- 3. Standards to ensure the availability of public facilities and the adequacy of those facilities to meet established acceptable levels of service.*
- 4. A schedule of capital improvements which includes any publicly funded projects of federal, state, or local government, and which may include privately funded projects for which the local government has no fiscal responsibility. Projects necessary to ensure that any adopted level-of-service standards are achieved and maintained for the 5-year period must be identified as either funded or unfunded and given a level of priority for funding.*

The applicant has proposed general capital improvements amendments for public facilities that would be necessitated by approval of this proposed development. As outlined above, this amendment to the capital improvements element should include estimated costs, timing, general location and projected revenue sources to fund the improvements. Many of the infrastructure needs as determined by the applicant in their data and analysis are not included

in the proposed policies. Fire/EMS, schools, solid waste and stormwater have no proposed capital improvements projects through 2020 though there are no policies that would prohibit impacts to these systems in that timeframe.

Florida Statutes Section 163.3177 (6) (a) 2. *The future land use plan and plan amendments shall be based upon surveys, studies, and data regarding the area, as applicable, including:*

- a. The amount of land required to accommodate anticipated growth.*
- b. The projected permanent and seasonal population of the area.*
- c. The character of undeveloped land.*
- d. The availability of water supplies, public facilities, and services.*
- e. The need for redevelopment, including the renewal of blighted areas and the elimination of nonconforming uses which are inconsistent with the character of the community.*
- f. The compatibility of uses on lands adjacent to or closely proximate to military installations.*
- g. The compatibility of uses on lands adjacent to an airport as defined in s. 330.35 and consistent with s. 333.02.*
- h. The discouragement of urban sprawl.*
- i. The need for job creation, capital investment, and economic development that will strengthen and diversify the community's economy.*

Florida Statutes Section 163.3177 (6) (a) 8. *Future land use map amendments shall be based upon the following analyses:*

- a. An analysis of the availability of facilities and services.*
- b. An analysis of the suitability of the plan amendment for its proposed use considering the character of the undeveloped land, soils, topography, natural resources, and historic resources on site.*
- c. An analysis of the minimum amount of land needed to achieve the goals and requirements of this section.*

All of the property proposed as EA-EOMU for urban uses has been designated as a Strategic Ecosystem in the County's Comprehensive Plan for its unique environmental features and need of protection of those features as required by Section 163.3177(6) (a) (2)(c), F.S. This character of land was taken into account in the creation of the County's Comprehensive Plan that defined an Urban Cluster line as a strong boundary separating urban uses from rural and environmentally sensitive areas. The applicant does not take the character of this rural and environmentally sensitive land into account in proposing these intense urban uses across 5,555 acres of their property. This proposed developed would be presumed to be urban sprawl as identified below in the discussion of Section 163.3177(6) (a) 9.a F.S. Though the proposed

application does discuss the need for job creation and economic development in accordance with Section 163.3177(6)(a)(2)(i), it does not supply any data and analysis that supports the provision of such intense uses on this property and does not provide sufficient data or analyze the rest of the County for potentially more suitable locations. The eastside of Gainesville was analyzed by the applicant and the data summarizes that the parcels in East Gainesville are dispersed and fragmented by existing development, conservation land and wetlands and they will develop as infill opportunities in response to market demand regulatory requirements and the context of the surrounding uses. No data provided supports why a sought after industry needs large swaths of land that are also separated by conservation land and wetlands (i.e., Plum Creek property). The rest of the County was analyzed for industrial uses (see Section 4.c. *Urban Cluster Expansion* of the staff report). County staff's analysis concludes that there are other suitable locations for industrial uses proximate to existing homes, transportation and other services.

Florida Statutes Section 163.3177(6) (a) 3. *The future land use plan element shall include criteria to be used to:*

...

- e. Coordinate future land uses with the topography and soil conditions, and the availability of facilities and services.*
- f. Ensure the protection of natural and historic resources.*
- g. Provide for the compatibility of adjacent land uses.*

...

The applicant has not demonstrated that the proposed intensity and density of an urban land use is appropriate for a property with such extensive poorly drained soils as required by the statutory provision above. The majority of the soils (approximately 95% of the project area) in the EOMU area consists of somewhat poorly drained to very poorly drained soils, and are not suitable for urban uses. Alachua County Comprehensive Plan COSE Policy 4.2.1 states that the characteristics of soil suitability and capability shall be considered in determining appropriate land uses. As explained in detail in Section IV Environmental Analysis of this report, this amendment does not ensure the protection of the natural resource and would remove the County's authority to determine if wetland impacts are appropriate in the areas proposed for the most intense development.

Florida Statutes Section 163.3177 (6) (a) 4. *The amount of land designated for future planned uses shall provide a balance of uses that foster vibrant, viable communities and economic development opportunities and address outdated development patterns, such as antiquated subdivisions. The amount of land designated for future land uses should allow the operation of real estate markets to provide adequate choices for permanent and seasonal residents and*

business and may not be limited solely by the projected population. The element shall accommodate at least the minimum amount of land required to accommodate the medium projections as published by the Office of Economic and Demographic Research for at least a 10-year planning period unless otherwise limited under s. 380.05, including related rules of the Administration Commission.

The Alachua County Comprehensive Plan has been created to provide a balance of uses for a viable community and economic development. The amount of land designated for each future land use allows the operation of the real estate market and provides much more than the minimum amount of land required to accommodate the medium population projections. The future land uses in the Comprehensive Plan were designed to meet these statutory requirements, taking into account the nature of the land, the proximity of residences to the services they need and the ability to provide services in an efficient and fiscally sound manner. The Envision Alachua Sector Plan is proposed in a location that is uniquely environmentally sensitive and quite removed from the urban core, which substantially increases the cost of urban public service provision. Development of this size in this location would not be efficient or fiscally sound.

Florida Statutes 163.3177 (6) (a) 9.a., F.S., *the future land use element and any amendment to the future land use element shall discourage the proliferation of urban sprawl.*

a. The primary indicators that a plan or plan amendment does not discourage the proliferation of urban sprawl are listed below. The evaluation of the presence of these indicators shall consist of an analysis of the plan or plan amendment within the context of features and characteristics unique to each locality in order to determine whether the plan or plan amendment:

- (I) Promotes, allows, or designates for development substantial areas of the jurisdiction to develop as low-intensity, low-density, or single-use development or uses.*
- (II) Promotes, allows, or designates significant amounts of urban development to occur in rural areas at substantial distances from existing urban areas while not using undeveloped lands that are available and suitable for development.*
- (III) Promotes, allows, or designates urban development in radial, strip, isolated, or ribbon patterns generally emanating from existing urban developments.*
- (IV) Fails to adequately protect and conserve natural resources, such as wetlands, floodplains, native vegetation, environmentally sensitive areas, natural groundwater aquifer recharge areas, lakes, rivers, shorelines, beaches, bays, estuarine systems, and other significant natural systems.*

- (V) *Fails to adequately protect adjacent agricultural areas and activities, including silviculture, active agricultural and Silvicultural activities, passive agricultural activities, and dormant, unique, and prime farmlands and soils.*
- (VI) *Fails to maximize use of existing public facilities and services.*
- (VII) *Fails to maximize use of future public facilities and services.*
- (VIII) *Allows for land use patterns or timing which disproportionately increase the cost in time, money, and energy of providing and maintaining facilities and services, including roads, potable water, sanitary sewer, stormwater management, law enforcement, education, health care, fire and emergency response, and general government.*
- (IX) *Fails to provide a clear separation between rural and urban uses.*

Florida Statutes Section 163.3177(6) (a) 9.b. *The future land use element or plan amendment shall be determined to discourage the proliferation of urban sprawl if it incorporates a development pattern or urban form that achieves four or more of the following:*

- (I) *Directs or locates economic growth and associated land development to geographic areas of the community in a manner that does not have an adverse impact on and protects natural resources and ecosystems.*
- (II) *Promotes the efficient and cost-effective provision or extension of public infrastructure and services.*
- (III) *Promotes walkable and connected communities and provides for compact development and a mix of uses at densities and intensities that will support a range of housing choices and a multimodal transportation system, including pedestrian, bicycle, and transit, if available.*
- (IV) *Promotes conservation of water and energy.*
- (V) *Preserves agricultural areas and activities, including silviculture, and dormant, unique, and prime farmlands and soils.*
- (VI) *Preserves open space and natural lands and provides for public open space and recreation needs.*
- (VII) *Creates a balance of land uses based upon demands of the residential population for the nonresidential needs of an area.*
- (VIII) *Provides uses, densities, and intensities of use and urban form that would remediate an existing or planned development pattern in the vicinity that constitutes sprawl or if it provides for an innovative development pattern such as transit-oriented developments or new towns as defined in s. 163.3164.*

Florida Statutes for comprehensive plan amendments require that amendments discourage the proliferation of urban sprawl. Section 163.3177(6) (a) 9.a.F.S., above, lists indicators that a plan amendment does not discourage urban sprawl. Plum Creek's Envision Alachua Sector Plan is proposed outside of the Urban Cluster in the rural area. The proposal is to designate significant amounts of urban development to occur in rural areas at substantial distances from existing urban areas while not developing undeveloped lands that are available and suitable for development. (Urban Sprawl Indicator II above). As analyzed in this report previously, including in Section IV Natural Resources Analysis Section, the proposed application fails to adequately protect and conserve natural resources such as wetlands, floodplains, native vegetation, environmentally sensitive areas, natural groundwater aquifer recharge areas, lakes, wildlife corridors and other significant natural systems. (Urban Sprawl Indicator IV). As the property is quite a distance from the urban services and facilities already in place, the amendment would allow for land use patterns and especially timing that would disproportionately increase the cost in time, money, and energy of providing and maintaining facilities and services, including roads, potable water, sanitary sewer, stormwater management, law enforcement, education, health care, fire and emergency response, and general government. (Urban Sprawl Indicator VIII). The proposed amendment also fails to provide a clear separation between urban and rural uses. (Urban Sprawl Indicator VI) There are enclaves within the EA-EOMU area that would remain rural and under the County's current regulations. The applicant has proposed **EASP Policy 10.3.3.5** to address the protection of rural edges. This policy includes not extending water and sewer beyond the SR 20 and US 301 Job Center EASP boundaries, the future development shall be comparable to adjacent residential development or consistent with the Comprehensive Plan or separated by a natural buffer of 100 feet. This policy also includes a provision that "...Compatibility with adjacent uses may also be satisfied by affirmative acknowledgement of the adjacent property owner(s) that they have no objection to the more intense adjacent development of the EASP through an instrument recorded in public land records." An acknowledgement does not protect neighboring uses. Placing a new town into a wet, rural area does not allow for protection of that rural area but assumes that that area of the County is ready for substantial development and conversion from rural to urban uses.

Florida Statutes states that a plan amendment would be determined to discourage sprawl if it can meet four of the criteria outlined above in Section 163.3177(6) (a) 9.b I – VII. The applicant provided an analysis of the sprawl statutes in Section 5.b.iii. of the application. Staff has also analyzed the sprawl statutes and compares the two below.

The first criteria, that the amendment *Directs or locates economic growth and associated land development to geographic areas of the community in a manner that does not have an adverse impact on and protects natural resources and ecosystems* cannot be met by this application. This area of the County is environmentally sensitive and contains all of the conservation land use listed in the County's Comprehensive Plan. As analyzed in Section IV Natural Resources

Section, the applicant is proposing policies that would lessen the regulation of those resources in the areas proposed for the most intense development.

The applicant provides an analysis that the area proposed for development will meet state and federal guidelines for the resources. This lessens the protection of natural resources required by the Alachua County Comprehensive Plan. As described in the applicant's sprawl analysis, there are several policies that deal with protection of the resources in this area including conservation easements and deed restrictions. A more appropriate area of the County would not need so many alternate protection policies. There are suitable areas of the County where development can happen without requiring any policies that allow wetlands and floodplain development inconsistent with County policy and good planning and development practices.

The second criterion for discouragement of urban sprawl *promotes the efficient and cost-effective provision or extension of public infrastructure and services*. The proposed area for development is outside of the Urban Cluster in an area that does not currently have urban facilities or services that would be needed for this development. The applicant states in their sprawl analysis that the amendment proposes efficient land use patterns and provision of infrastructure. However, due to the distances from existing urban services and the environmental sensitivity of the area, extension (or creation of) urban services to this area and throughout the area would not be efficient or cost-effective. The Urban Cluster boundary and policies to keep urban development within that boundary allow the County to provide efficient and cost-effective provision of services.

Criteria III for discouragement of urban sprawl is *Promotes walkable and connected communities and provides for compact development and a mix of uses at densities and intensities that will support a range of housing choices and a multimodal transportation system, including pedestrian, bicycle, and transit, if available* will possibly be met internally in a portion of the development. There are general policies proposed that would allow a future developer to develop the SR 20 Job Center with a walkable, mixed-use town center but meeting these design standards will be difficult. Walkable, multi-modal areas need interconnected, gridded patterns of development that would be difficult given the wetlands, floodplains and other protected natural resources throughout the proposed development area. There are also no policies to direct how the mobility between these separated sub-areas would be accomplished. The proposal is to supply needed jobs to east Alachua County. Assuming those jobs are to satisfy existing need, those needing the jobs are going to have to travel long distances to get to the jobs with very limited public transportation options.

Criteria IV for discouragement of urban sprawl is *Promotes conservation of water and energy*. The application contains proposed policies that would not allow residential irrigation and would require other water conservation methods and contains proposed general policies that discuss energy efficient building techniques. Even with conservation techniques, this type of intense

commercial and residential development, not currently allowed in the rural area, would increase water usage greatly. In addition, though the development itself may be built with energy conservation techniques, the distance from the urban area and other parts of the County that the proposed jobs centers intend to serve would increase the need for cars and buses to travel greater distances to bring employees and residents to and from the new community and other established services and destinations within the urban area of the County and the City of Gainesville.

Criteria V for discouragement of urban sprawl is *Preserves agricultural areas and activities, including silviculture, and dormant, unique, and prime farmlands and soils*. This proposed development intends to place approximately 18,826 acres of silviculture under conservation easements that would allow continued agriculture operations but no residential development or commercial development. The 5,555 acres in the EA-EOMU that is currently in silviculture would be developed as intense urban uses though and this would not be compatible with keeping the existing agriculture in the area on adjacent private properties. This is in addition to the property proposed for annexation into the city of Hawthorne that is also surrounded by farms and rural residences. Allowing a development of this size to proceed in a rural, agriculture area would open the door for future development and sprawl that would threaten the agriculture nature of this part of the County.

Criteria VI for discouragement of urban sprawl is *Preserves open space and natural lands and provides for public open space and recreation needs*. This proposed development is on land designated Strategic Ecosystem for the unique environmental resources found on the site. The proposed policies would not recognize current protections in the Comprehensive Plan for Strategic Ecosystems. The proposed policy includes a provision for a recreation master plan but no discussion of facilities or cost of those facilities. The County has adopted guidelines for recreational needs based on park type, distance, and population that the developer could use to more adequately plan at this stage. (Recreation Element Table 1: *Recreation Site Classification for Alachua County* is included in Appendix 5).

Criteria VII for discouragement of urban sprawl is *Creates a balance of land uses based upon demands of the residential population for the nonresidential needs of an area* and Criteria VIII is *Provides uses, densities, and intensities of use and urban form that would remediate an existing or planned development pattern in the vicinity that constitutes sprawl or if it provides for an innovative development pattern such as transit-oriented developments or new towns as defined in s. 163.3164*. The proposed policies would require a mix of uses in the SR Job Center with an urban center. The proposed development would not be remediating an existing or planned development pattern for the area that would constitute sprawl. Any development that could happen under current Comprehensive Plan requirements would be clustered, would not allow destruction of the wetlands and environmental resources, would meet all of the protections for

Strategic Ecosystems in the Comprehensive Plan and would not require the extension of urban services into the rural area.

Based on this analysis of the indicators in (a) and (b) of this section of statute, the proposed Envision Alachua Sector Plan does not discourage the proliferation of urban sprawl as required by state statute for comprehensive plan amendments.

VIII. Conclusion

Staff has reviewed the Envision Alachua Sector Plan application, including the supporting data and analysis. Based on the evaluation of the application, staff is recommending denial of this proposed comprehensive plan amendment. The application and accompanying backup material do not support the proposed density and intensity that would be allowed by the proposed policies. The proposed amendment does not provide for the adequate protection of natural resources. This rural area, which the application proposes for large-scale urban uses, lacks urban infrastructure or the proximity to existing urban infrastructure that would make provision of urban public services viable and efficient. A key issue for local governments in planning for urban growth in an area is the identification and establishment of a capital improvement program identifying projects and policies needed to serve the public. These facilities include those needed for services such as potable water supply, wastewater treatment, transportation and public schools. The proposed capital improvements policies except for transportation only cover through 2020 with no policies to limit development during that time frame. In addition, the proposed intense urban land uses are not compatible with the surrounding rural area and lifestyle. The amendment proposes policies that are inconsistent with the adopted plan and are contrary to the basic tenets of the Plan that include efficient timely provision of public facilities and services to further economic development while protecting the County's natural resources.

Both development trends in the County and most population projections do not support the potential for full buildout of the residential uses proposed in the EASP area. Likewise, there has been a limited demand for new industrial development, as indicated by things such as development applications and approvals for such uses, in comparison to the unbuilt land designated for Industrial uses in the County and its cities in areas that are more suitable in terms of the full range of public facility and infrastructure capacity for such development. As concluded in the report submitted with the EASP application "Plum Creek, UF, and Economic Growth in the Gainesville Region", "...over a horizon of 50 years, it makes little sense to imply anything is known with a high degree of certainty – there are too many things about the future that are crucial but unknown." This recognizes the possibility that the new 11.2 million square feet of industrial and other non-residential uses proposed in the EASP might not be realized. This uncertainty about the likelihood that the proposed development in the EASP area will be fully built-out, highlights the risks from a fiscal and economic perspective that would result from a partial buildout of the development program this EASP plan amendment is intended to accommodate. Such a partial build out could create a situation where new capital facilities sized and located to meet the needs for potable water and wastewater system capacity, roads, and other public facilities and services at buildout will entail significant capital and maintenance costs, while the revenues projected based on a full buildout scenario are not realized, resulting in substantial negative fiscal and economic impacts.