

**Proposed Envision Alachua Sector Plan/Comprehensive Plan Amendment CPA-01-14
Major Policy Issue # 1 Urban Cluster Boundary November 2, 2015**

Alachua County Comprehensive Plan

- Protects rural and agricultural areas and conservation resources by focusing urban development in a clearly defined area to strengthen the separation between rural and urban uses. **(Future Land Use Element (FLUE) Principle 2, FLUE General Strategy 1, FLUE Objective 6.1, Policy 7.1.3).**
- Discourages sprawl and maximizes the efficient use of existing urban infrastructure by directing new development to areas of suitable infrastructure and compatible land uses and where existing multiple modes of transportation exist and can be easily expanded **(General Strategy 1, Transportation Mobility Element (TME) Principle 2 and 3, Economic Element Objective 1.3)**
- Encourages higher densities and interconnected communities in the Urban Cluster to maximize existing public infrastructure and services and conserve environmentally sensitive areas **(FLUE Objective 1.6 - TNDs and 1.7 TODs)**
- Promotes redevelopment and infill **(Economic Element Policy 1.1.9)**
- Promotes energy conservation – policies related to Urban Cluster, Strategic Ecosystems **(Energy Element Policy 3.3.1)**
- Provides for periodic determination of a sufficient and non-excessive amount of land within the Urban Cluster to accommodate urban uses. When needed, first revise density standards or reallocate land uses in Urban Cluster before expanding Cluster. If expansion of Cluster is warranted, then evaluate appropriate location based on rural character, viable agriculture, proximity to existing services and infrastructure, Conservation and Preservation. **(FLUE Policy 7.1.3)**
- Amendments shall be considered based on policies and objectives of the Future Land Use Element and 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. **(FLUE Policy 7.1.23)**
- Proposes a 20 year time frame with evaluation and updates.

Envision Alachua Proposed Policies

- Proposes amendments to principles, strategies and policies to allow multiple urban clusters in the eastern rural part of the County. **(Proposed changes to FLUE General Strategy 1, Proposed Land Use map)**
- Proposes 8,700 residential units and 11.2 million square feet of non-residential in the rural area **(Proposed Policy 10.3.1)**
- Revises County policy on minimizing the conversion of rural land to urban uses and to allow multiple Urban Clusters. **(Proposed changes to FLUE General Strategy 1)**
- Proposed language saying that any references to the Urban Cluster in the Plan include any Urban Cluster. **(proposed changes to Urban Cluster definition)**
- Promote land development that creates economic opportunity if it is a Sector Plan **(Proposed new General Strategy 4).**
- Creates Envision Alachua specific land use of mixed-use to include industrial, commercial, residential and redefined preservation and conservation with urban intensities and densities in the rural area **(Proposed Policy 10.2.6, Proposed Land Use map, Proposed Policies 10.3.1, 10.3.3.1, 10.3.3.2, 10.3.3.3, 10.3.4.1, 10.3.4.2, 10.3.4.3)**
- Employment Oriented Mixed Use areas will function as an Urban Cluster **(Proposed Policy 10.2.1)**
- Proposes a 50 year time frame **(Proposed Objective 10.1)**

**Policy Question:
Should the County allow urban development outside of the Urban Cluster?**

The current Comprehensive Plan was adopted through an extensive community process focusing on community goals for the conservation of natural resources, protecting the environment, future growth, land use compatibility and economic development. The Comprehensive Plan goals, objectives, policies and maps designating particular land uses are based on consideration of the entire County and the suitability of specific areas for specific uses within the County. Within the current Comprehensive Plan is the establishment of the Urban Cluster, the purpose of which is the following:

- Minimize the conversion of rural land to more dense uses that may increase the need for more services in those rural areas.
- Direct development to the Urban Cluster and municipalities and in doing so, maximize the efficient use of existing infrastructure and eliminate the impacts of adding new infrastructure.

Plum Creek’s proposal is for the creation of two new urban clusters through adoption of policies specific to Plum Creek lands. Key policy considerations of this proposal include:

- Recognition of new urban cluster areas and the impact of those new clusters on the existing Urban Cluster and municipalities.
- Precedents established for future development outside the existing urban cluster.
- Provision of new infrastructure needed to accommodate the resulting development and consideration of whether this causes County-wide impacts.

**Proposed Envision Alachua Sector Plan/Comprehensive Plan Amendment CPA-01-14
Major Policy Issue # 2 Impacts to Natural Resources November 2, 2015**

**Alachua County Comprehensive
Plan**

- “Development activity shall not be authorized in wetlands or wetland buffers unless certain criteria are met including that... the applicant has taken every reasonable step to avoid adverse impacts to wetlands.” Conservation and Open Space Element (COSE) **Objective 4.7, Policy 4.7.1, Policy 4.7.4, 4.7.5, 4.7.12**
- Comprehensive Plan requires that the County Commission review all proposed unavoidable impacts to wetlands that require mitigation. **COSE Policy 4.7.7**
- Comprehensive Plan requires that the land use be consistent with the ability of the physical properties of the soil to support that land use. **COSE Obj. 4.2, Policy 4.2.1**
- Comprehensive Plan requires the protection and maintenance of the natural functions of floodplains and floodways. **COSE Obj. 4.8, Policy 4.8.2, 4.8.3, 4.6.8**
- Comprehensive Plan requires that developments are designed to maintain the natural characteristics of areas with shallow ground water tables and be able to demonstrate that the hydrologic character of associated conservation areas and ground water quality are protected. **COSE Policy 4.2.5, 4.5.9, 4.6.4**
- Land uses that have the potential to pollute surface waters, impaired waters, and Outstanding Florida Waters, shall require higher standards of protection. **COSE Policy 4.6.16, 4.6.17, Stormwater Element Policy 3.1.1, 5.1.2**

**Policy Question:
Should the County allow avoidable
impacts to wetlands? Should any
wetland impacts be allowed without
further County review or approval?**

The Comprehensive Plan prohibits impacts to wetlands except where they are unavoidable and approved by the County Commission. The Envision Alachua Sector Plan anticipates and allows 400 acres of wetland impact without County review or implementation of avoidance strategies and additional impacts with County approval. While mitigation would be required for the larger state-protected wetlands, mitigation of wetland impacts is not equivalent to avoiding the impact. Impacts to smaller County-protected wetlands would not have to be mitigated under the proposed policies.

This approach of the current Comprehensive Plan has resulted in development that has protected wetlands and therefore provided the community with water quality benefits, flood control and habitat. This current level of protection of the wetlands is clear in the goals identified by the community in development of the Comprehensive Plan.

The Comprehensive Plan requires that developments are designed in a way that maintains the natural characteristics of areas with shallow ground water tables and be able to demonstrate that the hydrologic character of associated conservation areas and ground water quality are protected. The Comprehensive Plan also restricts or limits land uses that have the potential to pollute surface waters, impaired waters, and Outstanding Florida Waters and has requirements for higher standards of protection in these areas. The Envision Alachua Sector Plan proposal allows for impacts through increased land use intensities in these sensitive land areas. Key policy considerations include:

- Allowing impacts to wetlands for development whether those impacts are or are not avoidable and allowing the impacts without County review and approval.
- Allowing urban level development to occur within environmentally sensitive areas that include the watershed of impaired water bodies.
- Through precedent, allowing impacts to wetlands countywide.

**Envision Alachua Proposed
Policies**

- The proposed policies state “In no event shall the filling of wetlands exceed a total of 400 acres within the entire EASP without approval of the County.” Wetlands in addition to these 400 acres could be impacted or destroyed upon further County Commission approval. **EASP Policy 10.4.2.1, 10.3.3.4, 10.3.4.4**
- Policies allow urban development on lands that contain mostly poorly drained soils with high water tables. **EASP Obj. 10.3, Policy 10.3.3.1, Policy 10.3.4.1**
- Project would demand significant amounts of water and create a significant amount of wastewater and stormwater; **EASP Policy 10.5.2**
- Development in areas that contain significant expanses of floodplains and wetlands with policies that include removing County protection standards for highest use areas. **EASP Policy 10.4.2.1, 3.3.1, 10.4.3.4.1**
- Establishes different protection standards for the same resources in different development areas within the EASP. **EASP Policy 10.4.2.1**
- Policies allow for urban development within the Orange Creek Basin Management Action Plan area and impaired watersheds of Newnan’s Lake and Lochloosa Lake, as classified by the Florida Department of Environmental Protection (FDEP). **EASP Policy 10.3.3.1, 10.3.4.1**

Proposed Envision Alachua Sector Plan/Comprehensive Plan Amendment CPA-01-14
Major Policy Issue # 3 Dedication of Conservation Resources November 2, 2015

Alachua County Comprehensive
Plan

- Comprehensive Plan requires that strategic ecosystems be evaluated and protected through land use planning and development review process based on the integrity of the ecological unit (**Conservation and Open Space Element (COSE) Policy 4.10.2**)
- Comprehensive plan requires that conservation resources (including wetlands and floodplains) be identified and protected first as open space. (**COSE Policy 5.2.3, 5.2.5, Future Land Use Element (FLUE) 6.2.5, 6.2.12**)
- Comprehensive Plan does not support the increase of density and intensity on parcels that contain or are adjacent to conservation resources unless adequate protection is insured. (**COSE Obj. 3.6, Policy 3.6.3, 3.6.5, 3.6.6, 3.6.7, 3.6.10, Economic Element Obj. 1.3**)
- Comprehensive Plan requires that adequate water supplies are available without causing adverse impacts on potable water supply and natural ecosystems (**COSE Policy 4.5.10**)
- Comprehensive Plan protects greenways and habitat for wildlife corridors and connectivity to prevent habitat fragmentation. The proposed area is within the heart of the County's Critical Ecological Corridor area and Priority 3 area of the Florida Ecological Greenways Network. (**COSE Policy 4.8.4, Obj. 4.9, Policy 4.9.2, Obj. 6.3**)

Envision Alachua Proposed
Policies

- The applicant proposes urban land uses in an area with significant conservation resources (wetlands, floodplains, strategic ecosystem). (**EASP Policy 10.2.6, Obj. 10.3**)
- Allows impacts that diminish wildlife connectivity and includes road crossings of their proposed Lochloosa creek wildlife corridor and additional wetland crossings without having to meet County regulations. (**EASP Policy 10.2.3**)
- Proposed amendments would allow development design to drive which conservation areas are preserved, rather than incorporating conservation area protection policies and locating development away from natural resources (**EASP Policy 10.2.6.1**)
- Extensive urban development in a strategic ecosystem (County-recognized conservation resource). (**EASP Policy 10.3.3.1, 10.3.4.1**)
- Intense urban uses within the heart of the County's Critical Ecological Corridor area and Priority 3 area of the Florida Ecological Greenways Network. (**EASP Policy 10.3.3.1, 10.3.4.1**)
- Proposes a new corridor design and map for regionally significant wildlife corridor; (**EASP Policy 10.2.1, 10.2.3, 10.2.3.1, 10.2.3.2, 10.2.3.3, 10.4.1.2, EASP Proposed Map F.17 and F.17A of the Future Land Use Map Series**)

Policy Question:
Should protection of Conservation
Resources be a determining factor in
development location and design?

The Comprehensive Plan requires protection of Strategic Ecosystems and other conservation resources. Development that contains or is adjacent to these conservation resources must first identify and protect the resources as open space.

The Comprehensive Plan protects greenways and habitat for wildlife corridors to prevent habitat fragmentation.

The Envision Alachua Sector Plan (EASP) area proposed for urban level development is entirely within the Lochloosa Strategic Ecosystem. The EASP proposal also includes four new road crossings in addition to the roads already in the area through significant wildlife corridors. Key policy considerations with this proposal include:

- Allowing increased density and intensity within the Lochloosa Creek Strategic Ecosystem.
- Allowing additional roadway crossings to fragment the County's Critical Ecological Corridor.
- Allowing development location and design to be a key factor in determining which resources are protected.

**Proposed Envision Alachua Sector Plan/Comprehensive Plan Amendment CPA-01-14
Major Policy Issue # 4 Economic Impact November 2, 2015**

Alachua County Comprehensive Plan

- Alachua County shall encourage the development and expansion of business and industry in appropriate locations that make efficient use of existing public services and infrastructure. **(Economic Element Policy 1.3.2)**
- Alachua County shall adopt objective standards for timely decisions on applications for development approval for business and industrial uses that correspond to Alachua County's Comprehensive Plan and Zoning Ordinances. **(Economic Element Policy 1.3.1)**
- The Comprehensive Plan directs development to areas that will maximize the efficient use of existing infrastructure or where infrastructure can be easily expanded and where existing multiple modes of transportation exist **(General Strategy 1, Transportation Mobility Element (TME) Principle 2 and 3, Economic Element Objective 1.3)**
- The County's Comprehensive Plan promotes redevelopment and infill **(Economic Element Policy 1.1.9)**
- The Comprehensive Plan promotes energy conservation by allowing urban development in urban areas where existing services can be provided and the need for driving long distances to work, shop or play are reduced or eliminated **(Energy Element Policy 3.3.1, FLUE Objective 1.6 - TNDs and 1.7 TODs)**

Envision Alachua Proposed Policies

- Proposes 8,700 residential units and 11.2 million square feet of non-residential in the rural area **(Proposed Policy 10.3.1)**
- Proposes a new general strategy to promote land development that creates economic development opportunities to support the innovation economy if it is within a Sector Plan **(Proposed new General Strategy 4).**
- Creates new urban land uses in the rural area that require urban services **(Proposed Policy 10.2.6, Proposed Land Use map, Proposed Policies 10.3.1, 10.3.3.1, 10.3.3.2, 10.3.3.3, 10.3.4.1, 10.3.4.2, 10.3.4.3)**
- Proposed capital improvements for transportation through buildout **(Capital Improvements Element (CIE) proposed Table 4)** and water and wastewater facilities through 2020 **(CIE proposed Table 4 and 5).**
- Proposes to address all other needed infrastructure and water and wastewater facility needs beyond 2020 at each Detailed Specific Area Plan (DSAP) **(Proposed Policy 10.6.4)**
- Proposes policy stating developer will pay for all on-site infrastructure and their portion of off-site infrastructure **(Proposed Policy 10.5.8)**
- Proposes a 50 year time frame **(Proposed Objective 10.1)**

**Policy Question:
Should the County allow urban development of rural land instead of directing development to the Urban Cluster and municipalities?**

The County's Comprehensive Plan policies direct economic development including the expansion of business and industry to appropriate locations that maximize the efficient use of existing public infrastructure and services and that are near existing population centers.

The Plum Creek proposal includes 8,700 new residential units and 11.2 million square feet of non-residential creating a need for new urban public facilities and services, including major water and wastewater treatment facilities, in a rural area of the County. The proposal includes policies stating the developer will pay for on-site infrastructure and the development's portion of off-site infrastructure. Key policy decisions with this proposal include:

- Allowing significant urban level infrastructure and services to be developed in the rural area with potential County financial liability.
- Allowing economic development to be directed to areas outside of the Urban Cluster that would compete with economic development efforts in the Urban Cluster and municipalities that have suitable infrastructure currently in place.
- Ensuring that any resulting development allowed to occur in this area is supported by policies that implement the economic development opportunities envisioned and address land use form, mix of uses and timing, taking into consideration the need for this development and the impact on the County and municipalities.