

Florida Statutes requires that amendments to the future land use element discourage the proliferation of urban sprawl and provides guidance in two forms: 1) primary indicators that a plan or plan amendment does not discourage the proliferation of urban sprawl and 2) description of development pattern and urban form that shall be used to determine that a plan amendment discourages urban sprawl. These two sets of indicators form a method for determining the extent to which a plan amendment does or does not discourage urban sprawl. This assessment includes two (2) sections that address each of the statutory indicators as follows:

- A. *Primary Sprawl Indicators (163.3177(6)(a) 9.a, F.S.)*
- A.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.*
 - A.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.*
 - A.III *Promotes, allows, or designates urban development in radial, strip, isolated, or ribbon patterns generally emanating from existing urban developments.*
 - A.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.*
 - A.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.*
 - A.VI *Fails to maximize use of existing public facilities and services.*
 - A.VII *Fails to maximize use of future public facilities and services.*
 - A.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.*
 - A.IX *Fails to provide a clear separation between rural and urban uses.*
- B. *Development Pattern/Form that discourages Sprawl (163.3177(6)(a) 9.b, F.S.)*
- B.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.*
 - B.II *Promotes the efficient and cost-effective provision or extension of public infrastructure and services.*
 - B.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.*
 - B.IV *Promotes conservation of water and energy.*
 - B.V *Preserves agricultural areas and activities, including silviculture, and dormant, unique, and prime farmlands and soils.*

- B.VI Preserves open space and natural lands and provides for public open space and recreation needs.*
- B.VII Creates a balance of land uses based upon demands of the residential population for the nonresidential needs_of an area.*
- B.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.*

URBAN SPRAWL ANALYSIS SUMMARY

Although the statute only requires that an amendment meet a minimum of four of the eight development pattern or urban form criterion identified in 163.3177(6)(a) 9.b. to make a determination that an amendment discourages the proliferation of urban sprawl, this assessment demonstrates 1) that the revised EASP amendment does not exhibit the indicators of urban sprawl as described in 163.3177(6)(a) 9.a, and furthermore that 2) the revised EASP amendment exhibits all eight of the stated criterion to make the determination that the amendment discourages the proliferation of urban sprawl.

A. PRIMARY SPRAWL INDICATORS (163.3177(6)(a) 9.(a), F.S.)

STAFF COMMENT

This indicator was not specifically addressed in the preliminary staff comments.

INDICATOR:

A.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.

RESPONSE

The EASP plan amendment is proposed as a Sector Plan under Florida Statutes, 163.3245, and as such provides long-range planning for a substantial geographic area and emphasizes urban form and the protection of regionally significant resources. The EASP revised amendment includes approximately 52,745 acres of land in Eastern Alachua County, of which 3,538 acres are protected as Preservation Lands, 41,691 acres are protected as Conservation Lands with 22,865 acres in existing conservation easements and 18,826 acres in proposed new conservation areas and an additional 2,174 acres are protected as Open Space.

Urban land uses are proposed on 5,555 acres (11%) of the total revised amendment as Employment Oriented Mixed Use (EA-EOMU), which averages a minimum of 39 % of the EA-EOMU land be dedicated to open space uses, leaving a total of 3,381 as the maximum amount of lands available for urban development.

The EA-EOMU is an urban land use designation that is proposed to function as an urban cluster and requires a mix of land uses which are supported by minimum densities and intensities to insure that the development does not develop as low-intensity, low-density, or single-use development or uses.

MIX OF LAND USES POLICIES

Policy 10.3.3.3 SR 20 Job Center Mix of Uses (PARTIAL EXCERPT)

a. Composite Land use Mix.

The SR 20 Job Center shall be developed to accommodate a composite land use mix as described below.

	<u>Minimum</u>	<u>Maximum</u>
<u>Open Space (1)</u> <u>(Percentage of SR 20 Job Center Total Acres)</u>		
	<u>50%</u>	<u>(1)</u>
<u>Area Net of Open Space</u> <u>(Percentage of SR 20 Job Center Total Acres net of open space)</u>		
<u>R&D / Office</u>	<u>15%</u>	<u>30%</u>
<u>Manufacturing</u>	<u>0%</u>	<u>20%</u>
<u>Commercial</u>	<u>1%</u>	<u>20%</u>
<u>Residential</u>	<u>40%</u>	<u>75%</u>
<u>Recreation (2)</u>	<u>5%</u>	<u>---</u>
<u>Civic</u>	<u>5%</u>	<u>---</u>

RESPONSE (CONT.): INDICATOR A.I

Policy 10.3.4.3 US 301 Job Center Mix of Uses (PARTIAL EXCERPT)

a. Composite Land Use Mix

The US 301 Job Center shall be developed to accommodate a composite land use mix as described below.

	Minimum	Maximum
<i>Open Space (1)</i>		
<i>(Percentage of US 301 Job Center Total Acres)</i>		
	30%	(1)
<i>Buildable Area</i>		
<i>(Percentage of US 301 Job Center Total Buildable Acres)</i>		
<i>Commercial</i>	0%	10%
<i>R&D / Office</i>	0%	10%
<i>Manufacturing</i>	25%	50%
<i>Residential</i>	25%	60%
<i>Recreation (2)</i>	5%	---
<i>Civic</i>	7%	---

MINIMUM DENSITY AND INTENSITY POLICIES

Policy 10.3.3.2 SR 20 Job Center Permitted Uses / Density / Intensity

Lands designated within the SR 20 Job Center shall be permitted the full range of uses as described in Policy 10.2.6.

a. SR 20 Job Center densities and intensities

Use	Density (Dwelling Units / Gross Residential Acre) ²		Intensity FAR ²	
	Min	Max	Min	Max
<i>Mixed Use Research Park</i>				
<i>R&D / Office</i>	<i>n/a</i>	<i>(1)</i>	<i>0.50</i>	<i>2.00</i>
<i>Commercial</i>	<i>n/a</i>	<i>(1)</i>	<i>n/a</i>	<i>2.00</i>
<i>Residential</i>	<i>20</i>	<i>45</i>		
	<i>DU/AC</i>	<i>DU/AC</i>		
<i>Outside Mixed Jobs Use Center</i>				
<i>R&D / Office</i>	<i>n/a</i>	<i>(1)</i>	<i>0.20</i>	<i>0.50</i>
<i>Advanced Manufacturing</i>	<i>n/a</i>	<i>n/a</i>	<i>0.15</i>	<i>0.50</i>
<i>Commercial</i>	<i>n/a</i>	<i>n/a</i>	<i>0.20</i>	<i>0.35</i>
<i>Residential</i>	<i>3.0</i>	<i>7.0</i>		
	<i>DU/AC</i>	<i>DU/AC</i>		

(1) There is no maximum density within vertically mixed use structures. The maximum residential development is limited by the overall development program.

(2) Density / Intensity as calculated over the total acreage developed for each specified use within the SR 20 Job Center.

b. SR 20 Job Center Mixed Use Research Park

The SR 20 Job Center shall include a Mixed Use Research Park. The Mixed Use Research Park shall be a minimum of 300 contiguous acres and shall provide for a focused hub of urban development that includes a mix of both residential and non-residential uses. The Mixed Use Research Park shall require mixed-use development with active ground-floor uses focused along primary streets and available access to public transit, providing a compatible mix of employment, housing, shopping, and community civic uses, which will serve as a focal point for the SR 20 Job Center. The Mixed Use Research Park shall be located within 1.25 miles of SR 20.

RESPONSE (CONT.): INDICATOR A.I

Policy 10.3.4.2 US 301 Job Center Permitted Uses/Density/Intensity

Lands designated within the US 301 Job Center shall be permitted the full range of uses as described in Policy 10.2.6 with the densities and intensities as described below.

<u>Use</u>	<u>Density</u> <u>(Dwelling Units / Gross Residential Acre)²</u>		<u>Intensity</u> <u>FAR²</u>	
	<u>Min</u>	<u>Max</u>	<u>Min</u>	<u>Max</u>
<u>R&D / Office</u>	<u>n/a</u>	<u>(1)</u>	<u>0.20</u>	<u>1.00</u>
<u>Advanced Manufacturing</u>	<u>n/a</u>	<u>n/a</u>	<u>0.15</u>	<u>2.00</u>
<u>Commercial</u>	<u>7.0</u> <u>DU/AC</u>	<u>15 DU/AC</u>	<u>0.20</u>	<u>1.00</u>
<u>Residential</u>	<u>2.0</u> <u>DU/AC</u>	<u>7.0</u> <u>DU/AC</u>		

(1) There is no maximum density within vertically mixed use structures. The maximum residential development is limited by the overall development program.

2) Density/Intensity as calculated over the total acreage developed for each specified use within the US 301 Job Center.

The proposed policies include a linkage standard between jobs and housing and further requires that each Detailed Specific Area Plan (DSAP) include a phasing plan to assure compliance with the jobs to housing balance, which shall link increments of non-residential development to a maximum number of dwelling units allowed within each phase of development.

Policy 10.2.6.3 EA-EOMU Jobs to Housing Balance

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).
- b. Measurement for achieving the jobs-to-housing balance shall be based upon the following:
 - i. The jobs-to-housing balance shall be measured for development within each DSAP based upon the assumptions that the average amount of floor area per employee by land use is:

<u>R&D/Office</u>	<u>3.6 Employees / KSF or 1 Employee per 275 SF</u>
<u>Commercial</u>	<u>2.2 Employees/KSF or 1 Employee per 450 SF</u>
<u>Advanced Manufacturing</u>	<u>1.0 Employees / KSF or 1 Employee per 1,000 SF</u>

KSF = 1000 square feet of gross floor area, SF = square feet of gross floor area.

- ii. To promote an appropriate jobs to housing mix and the timing of residential and nonresidential uses during the development of the EA-EOMU areas of the EASP, the following requirements shall be met:
 - (a) Each DSAP shall be required to provide a phasing plan to assure compliance with the jobs to housing balance, which shall link increments of non-residential development to a maximum number of dwelling units allowed within each phase of development.
 - (b) Until a minimum of 1,000,000 square feet of non-residential development has been constructed or is under construction, residential development shall be limited to a maximum of 1,000 dwelling units that may be authorized to commence construction.

The County shall not accept a DSAP for filing if these minimum requirements are not met.

RESPONSE (CONT.): INDICATOR A.I

The amendment specifically prohibits a DSAP with single use residential uses within EA-EOMU.

Policy 10.6.4 DSAP Minimum Requirements (PARTIAL EXCERPT)

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:

c. Land Use Mix. Identification of land use mix by phase. The EASP prohibits a DSAP with single use residential uses within EA-EOMU.

This indicator of urban sprawl is not present in the revised EASP plan amendment.

A. PRIMARY SPRAWL INDICATORS (163.3177(6)(a) 9.(a), F.S.)

STAFF COMMENT

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).

INDICATOR:

A.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.

RESPONSE

The revised EASP amendment was designed to address the current lack of job opportunities proximate to lower income residential areas in east Alachua County. To insure a viable and stable economic center that would serve this area over time (the EASP projects a 50 year planning horizon) the amendment proposes two Job Centers that support a variety of possible employers. The proposed scale of the Jobs Centers creates an opportunity in Alachua County that doesn't currently exist to attract large employers that can serve as the catalytic tenants to energize a region's economy and to provide expansion opportunities for existing institutional prospects that are currently constrained by parcel size or adjacent uses.

The Data & Analysis for the amendment includes a more focused assessment of the lands within east Gainesville to determine the extent to which these lands could function to support the proposed EA-EOMU land uses.

East Gainesville & EASP. (Excerpt from Appendix 4 East Gainesville Analysis, Land Use Data & Analysis: Addendum, April 2015, Sasaki Associates, Inc.

East Gainesville and Envision Alachua present important and distinct opportunities for economic development. The vacant / undeveloped parcels in East Gainesville, be they publicly or privately owned, are well suited to infill opportunities. Because these parcels are comparatively dispersed and fragmented by existing development, conservation land, and wetlands, they will redevelop as infill opportunities in response to market demand, regulatory requirements, and the context of surrounding land uses. Envision Alachua could accommodate coordinated, large scale economic development opportunities in a planned context, maximizing the potential to attract companies which will seed, co-locate, and grow over time in one place.

RESPONSE (CONT.): INDICATOR A.II

Each of these assessments include supporting data and analysis that demonstrate that the type of economic development proposed under this plan amendment cannot be accommodated by other undeveloped lands in or near the existing urban cluster because these lands are not suitable for the proposed job centers.

This indicator of urban sprawl is not present in the revised EASP plan amendment.

A. PRIMARY SPRAWL INDICATORS (163.3177(6)(a) 9.(a), F.S.)

STAFF COMMENT

This indicator was not specifically addressed in the preliminary staff comments.

INDICATOR:

A.III. Promotes, allows, or designates urban development in radial, strip, isolated, or ribbon patterns generally emanating from existing urban developments.

RESPONSE

The urban development portion of the EASP is provided in the form of a mixed-use land use category that is proposed to function as a distinct urban cluster under the Alachua County Comprehensive Plan and the proposed standards for the patterns of development within the EASP do not permit radial, strip, ribbon patterns of development.

The proposed policies include specific standards that address the form of development to be provided in the EA-EOMU that include standards that address the patterns of development and maintain the principles of walkability.

Policy 10.3.2.2 EA-EOMU Circulation and Connectivity

Development with the EA-EOMU shall provide for interconnected, mixed-use development through specific site and design standards that create pedestrian and bicycle friendly communities, reduce per capita greenhouse gas emissions and vehicular trips on external roadways, and provide development patterns that are transit supportive.

The proposed policies also include standards that focus on the functional relationships between the mix of uses, including residential uses and employment, supporting commercial uses, recreation and open spaces and includes specific distance standards between these important uses to facilitate multi-modal transportation opportunities including walking, biking and transit.

Policy 10.3.2 EA-EOMU Design Standards - General

Site and building design, including scale, shall create a pedestrian-, bicycle- and transit-friendly environment. Architectural and site design techniques shall be used to promote walkable and bikeable communities.

- a) The site design shall conform to a compact development pattern, with opportunities for shopping and workplaces near residential neighborhoods;
- b) The site layout and orientation of buildings shall create a development that is designed around the pedestrian and bicyclist, creates an environment that promotes walking and bicycling as an alternative means of mobility, accommodates transit and connects activities within the EA-EOMU;
- c) Development shall be served by a connected internal street network such that use of existing rural roads is not required or convenient for internal travel.
- d) The location of residential uses within each sub-area of the EA-EOMU will ensure that a majority of housing is within a 1 / 2 mile radius of non-retail employment uses.
- e) The location of employment uses with the EA-EOMU will ensure that a majority of jobs created shall be located within a 1 / 2 mile radius of future transit access for a transit connection to east Gainesville or Hawthorne.

RESPONSE (CONT.): INDICATOR A.III

Policy 10.3.2.3 EA-EOMU Access to Civic Uses

The EA-EOMU shall include provisions to insure accessibility to civic uses as follows:

- a. The location of residential uses within the EA-EOMU will ensure that all residential uses are within a ¼ mile radius of recreation, open space or conservation lands;
- b. Food production shall be encouraged at the parcel level and some open spaces shall be adequately sized to accommodate community gardens;
- c. The County shall support the development of markets and programs within the EA-EOMU that promote the sale of locally produced agricultural goods, including but not limited to farmers markets, community gardens, farm to institution programs, and agritourism opportunities. The County shall partner with local community groups and organizations and other local governments to pursue funding sources for the development of a sustainable local food system.

This indicator of urban sprawl is not present in the revised EASP plan amendment.

A. PRIMARY SPRAWL INDICATORS (163.3177(6)(a) 9.(a), F.S.)

STAFF COMMENT

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).

INDICATOR:

A.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.

RESPONSE

Of the approximately 52,745 acres included in the revised EASP amendment, at least 47,403 acres (89%) will be maintained as Preservation, Conservation or Open Space lands.

Due to the size and location of this plan amendment, the amendment has been specifically designed to articulate and establish a regional approach to natural resource protection. The Environmental Data & Analysis Support Document prepared for the amendment points out that “The Plum Creek Envision Alachua Sector Plan represents a rare chance to design for ecological sustainability at a regional scale, thereby reducing landscape fragmentation, conserving ecosystem integrity, and providing a framework around which to design a compact urban footprint and incorporate infrastructure efficiently.” The policy framework that has been proposed ensures that this opportunity is fully realized by the amendment and that the policies adequately protect and conserve natural resources, such as wetlands, floodplains, native vegetation, environmentally sensitive areas, natural groundwater aquifer recharge areas, lakes, rivers, shorelines, and other significant natural systems through the following strategies:

1. Establish specific Future Land Use Map Designations for Preservation and Conservation Lands.

The proposed amendment establishes a Preservation (EA-PRES) future land use designation on 3,538 acres of land and a Conservation (EA-CON) future land use designation on 41,691 acres of land. These land use designations are both expressly delineated on the future land use map (as opposed to being defined by textual description and designated piecemeal after the fact) and protective of those lands by prohibiting residential uses, prohibiting transfers of density from these lands and limiting the uses within these areas.

2. Require a deed restriction for Preservation and Conservation lands that sets forth the land use limitations of each future land use designation within 90 days of the effective date of the EASP.

Policy 10.2.3.2 EA-PRES Deed Restrictions

Within 90 days of effective date of the EASP, a deed restriction shall be filed for lands within EA-PRES that sets forth the land use limitations as provided in the EA-PRES future land use category. This deed restriction shall remain in effect until such time as 1) the County reduces the development program of the EASP without the consent of the landowner or 2) the land owner provides formal notice to the County of abandonment of the EASP or 3) is replaced by a conservation easement applicable to the same property. The deed restriction shall include enforcement provisions providing standing to enforce to a non-governmental non-profit conservation organization.

Policy 10.2.4.2 EA-CON Deed Restrictions

Within 90 days of effective date of the EASP, a deed restriction shall be filed for lands within EA-CON that do not have a conservation easement in place on the date of the adoption of the EASP that sets forth the land use limitations as provided in the EA-CON future land use category. This deed restriction shall remain in effect until such time as 1) the County reduces the development program of the EASP without the consent of the landowner or 2) the land owner provides formal notice to the County of abandonment of the EASP or 3) is replaced by a conservation easement applicable to the same property. The deed restriction shall include enforcement provisions providing standing to enforce to a non-governmental non-profit conservation organization.

3. Require Conservation Easements for all lands protected from development, not just for those areas preserved as “permanent preservation.”

Policy 10.4.1.1 Timing of Conservation Easements (PARTIAL EXCERPT)

Conservation easements within the EASP will be required as a part of each specific DSAP approval process as follows:

- a. Permanent Preservation Areas. A conservation easement shall be provided for EA-PRES land areas at the time of approval of the first DSAP. Said conservation easement shall be provided and will be transferred to the St. Johns River Water Management District and to a qualified conservation organization acceptable to the County and experienced in holding and maintaining conservation easements, subject to their acceptance after review and approval of the easement as to form and content.
 - b. Permanent Conservation Areas. A conservation easement shall be provided at the time of individual development plan approval for EA-CON lands in the DSAP that are not covered by a conservation easement in direct proportion to the percentage of the nonresidential development proposed in the DSAP relative to the total amount of nonresidential development authorized in Policy 10.3.1 or the percentage of residential units proposed in the DSAP relative to the total number of residential units authorized in Policy 10.3.1, whichever percentage is greater. Said conservation easement shall be provided and will be transferred to the St. Johns River Water Management District and to a qualified conservation organization acceptable to the County and experienced in holding and maintaining conservation easements, subject to their acceptance after review and approval of the easement as to form and content. For subsequent DSAP applications, the minimum requirement shall be evaluated as a cumulative proportional relationship.
4. Establish DSAP minimum requirements that insure that there is a proportional relationship between the lands that will be protected through conservation easements to the total development program that is included in each DSAP. (See Policy 10.4.1.1 Excerpt above).
 5. Establish specific provisions for natural resource protection for wetlands that insures that there will be no net loss of wetland function. Impacts to natural systems and wetlands while permitted, are limited to the extent that they are authorized by state and federal permits and to a maximum acreage over the entire EASP.

Policy 10.3.3.4 SR 20 Job Center Natural Resources Protection (partial excerpt)

a. Wetlands Protection

- i. Wetlands are defined as those areas regulated as jurisdictional wetlands by the State of Florida as of the date of adoption of this amendment.
- ii. The SR 20 Job Center shall be designed such that there will be no net loss of wetland function.
- iii. The County recognizes and determines that the concentration of development within the SR 20 Job Center to accommodate a large-scale employment center is of overriding public interest. Therefore limited impacts to natural systems and wetlands within the SR 20 Job Center are permitted to the extent authorized by state and federal permits, and shall be limited by Policy 10.4.2.1.
- iv. Wetland acreage and function within the SR 20 Job Center shall be protected through compliance with state and federal environmental permitting requirements. Obtaining the appropriate state and federal environmental permits and compliance with the policies of Objective 10 of the Future Land Use Element shall constitute compliance with the Comprehensive Plan and the land development regulations of Alachua County for the purposes of wetland protection. To minimize encroachment into wetland areas, existing forestry roadways shall be given priority in design, street layout and siting considerations.

b. Wetlands Buffers

Wetland ecosystems protected as provided in Policy 10.3.3.4.a. shall be further protected from potential development impacts by buffers with minimum widths established in Policy 10.4.1.3.

RESPONSE (CONT.): INDICATOR A.IV

c. Mitigation

Any development activity permitted within an onsite, or affecting an offsite, wetland or buffer shall be mitigated in accordance with state and federal environmental permit requirements.

Policy 10.4.2.1 Wetlands Protection

The provisions of the Alachua County Comprehensive Plan relating to wetlands protection, and associated implementing regulations, shall be applicable to EA-RUR and EA-CON. Standards relating to wetland protection for EA-EOMU shall be as provided in Policies 10.3.3.4, and 10.3.4.4, and standards for EA-PRES shall be as provided in Policy 10.2.3. In no event shall the filling of wetlands exceed a total of 400 acres within the entire EASP without approval of the County.

Policy 10.3.4.4 US 301 Job Center Natural Resources Protection (Partial Excerpt)

a. Wetlands Protection

- i. Wetlands are defined as those areas regulated as jurisdictional wetlands by the State of Florida as of the date of adoption of this amendment.
- ii. The US 301 Job Center shall be designed such that there will be no net loss of wetland function.
- v. The County recognizes and determines that the creation of development within the US 301 Job Center to accommodate rail-based advanced manufacturing is of overriding public interest. Therefore, limited impacts to natural systems and wetlands for the purpose of advanced manufacturing facilities, creating rail spurs, and for the construction of internal roads and road connections are permitted to the extent authorized by state and federal permits and shall be limited by Policy 10.4.2.1.
- iii. Wetland acreage and function within the US 301 Job Center shall be protected through compliance with state and federal environmental permitting requirements. Obtaining the appropriate state and federal environmental permits and compliance with the policies of Objective 10 of the Future Land Use Element shall constitute compliance with the Comprehensive Plan and the land development regulations of Alachua County for the purposes of wetland protection. To minimize encroachment into wetland areas, existing forestry roadways shall be given priority in design, street layout and siting considerations.

b. Wetlands Buffers

Wetland ecosystems protected as provided in Policy 10.3.4.4.a, shall be further protected from potential development impacts by buffers with minimum widths established in Policy 10.4.1.3.

c. Mitigation

Any development activity permitted within an onsite, or affecting an offsite, wetland or buffer shall be mitigated consistent with state and federal environmental permit requirements.

6. Establish specific provisions for natural resource protection for water resources.

Policy 10.4.3.1 Water Supply Strategy

Policy 10.4.3.1 Water Supply Strategy

The lands within the EASP shall be managed and developed to incorporate state of the art water conservation, treatment and delivery technology as defined by the following water supply strategy components:

- a. Use conservation-first strategies within the EA-EOMU for water supply that recognizes supply limitations and reflects the value of the resource;
- b. The use of large water storage facilities for water harvesting and capture shall be encouraged;
- c. State-of-the-art system components (e.g., water recycling) shall be incorporated where appropriate and feasible;
- d. The priority for the use of reclaimed water shall be given to environmental restoration projects, industrial users and agricultural users;
- e. All wells within the EA-EOMU and the EA-RUR shall be monitored as part of a utility system;
- f. The use of "Florida Friendly" plant species shall be required for landscaping within the EA-EOMU, with a preference for native species.

This indicator of urban sprawl is not present in the revised EASP plan amendment.

A. PRIMARY SPRAWL INDICATORS (163.3177(6)(a) 9.(a), F.S.)

STAFF COMMENT

This indicator was not specifically addressed in the preliminary staff comments.

INDICATOR:

A.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.*

RESPONSE

The revised EASP amendment specifically protects adjacent agricultural areas and activities, including silviculture, active agricultural and silvicultural activities, passive agricultural activities, and dormant, unique, and prime farmlands and soils by insuring long-term compatibility with adjacent areas through specific rural edge protection standards between existing rural uses and the EA-EOMU.

Policy 10.3.3.5 SR 20 Job Center Protection of Rural Edges
Development within the SR 20 Job Center shall be designed to protect and separate the urban uses of the SR 20 Job Center from areas outside the EASP as well as adjacent preservation or conservation lands. The developed lands within the SR 20 Job Center shall be located and managed in a manner that helps to create and maintain such edges. The edge conditions shall be managed based upon the following standards:

- a. There shall be no extension of water and sewer utility services from within the SR 20 Job Center to areas outside of the EASP.
- b. Development shall be served by a connected internal street network that is designed to reduce the travel time for internal EASP travel between the SR 20 Job Center and the US 301 Job Center in order to limit EASP internal trips through Windsor.
- c. Future development within the SR 20 Job Center that is immediately adjacent to lands assigned the Rural/Agriculture Future Land Use Category shall be comparable to the built adjacent residential development, or be consistent with those uses allowed by the adopted Comprehensive Plan, or shall be separated from the property boundary by a natural buffer of at least 100' in width. 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
- d. Future development within the SR 20 Job Center adjacent to lands in public ownership and protected by a conservation easement as of the adoption date of this amendment shall be separated by a natural buffer of at least 50'.

Policy 10.3.4.5 US 301 Job Center Protection of Rural Edges
Development within the US 301 Job Center shall be designed to protect and separate the urban uses of the US 301 Job Center from areas outside the EASP as well as adjacent preservation or conservation lands. The developed lands within the US 301 Job Center shall be located and managed in a manner that helps to create and maintain such edges. The edge conditions shall be managed based upon the following standards:

- a. There shall be no extension of water and sewer utility services from within the US 301 Job Center to areas outside of the EASP.

RESPONSE (CONT.): INDICATOR A.V

- b. Development shall be served by a connected internal street network such that the use of existing rural roads outside the boundaries of the EASP are not required or convenient for internal travel.*
- c. Future development within the US 301 Job Center that is immediately adjacent to lands assigned the Rural/Agriculture Future Land Use Category shall be comparable to the built adjacent residential development, or be consistent with those uses allowed by the adopted Comprehensive Plan, or shall be separated from the property boundary by a natural buffer of at least 100' in width. 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. Property located on the opposite side of US 301 shall not be considered to be adjacent.*
- d. Future development within the US 301 Job Center adjacent to lands in public ownership and protected by a conservation easement as of the adoption date of this amendment shall be separated by a natural buffer of at least 50'.*

In addition, the revised EASP amendment also maintains these uses within the EASP. Agricultural and silvicultural uses are permitted within the EA-RUR and the EA-EOMU land use classifications and are permitted with limitations within the EA-CON land use classification.

This indicator of urban sprawl is not present in the revised EASP plan amendment.

A. PRIMARY SPRAWL INDICATORS (163.3177(6)(a) 9.(a), F.S.)

STAFF COMMENT

This indicator was not specifically addressed in the preliminary staff comments.

INDICATOR:

A.VI. *Fails to maximize use of existing public facilities and services.*

RESPONSE

The revised EASP amendment maximizes the use of existing transportation facilities (including existing rail lines) by:

1. Locating development along SR 20 and US 301, facilities with excess capacity that is sufficient to accommodate projected development within the EASP through the ACCP horizon year 2030.
2. Locating the US 301 Job Center adjacent to an existing rail line and is envisioned as a multi-use campus featuring advanced manufacturing and industrial uses which utilize the area's connections to US 301 and the railroad as describe in Policy 10.3.4.

The revised EASP amendment maximizes the use of existing school facilities by establishing a priority for the use of existing school capacity.

Policy 10.5.4 Public School Facilities

To provide adequate school facilities to meet the needs of the EASP, the following standards and protocol shall apply to the DSAP application process:

- a. *An ongoing dialogue and coordination shall be established with the Alachua County School Board to plan for adequate school facilities based on anticipated growth within the area.*
- b. ***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.***
- c. *Through the DSAP review and approval process, ensure that new residential development shall meet all of the requirements for adequate facilities based on the level of service standards adopted in this Plan for public schools.*
- d. *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-EOMU future land use category.*

The revised EASP amendment maximizes the use of existing Fire/EMS services and facilities by supporting and prioritizing the conversion of the existing Windsor Volunteer Fire Department, St. #30 to a full station with EMS as the method of service for the SR 20 Job Center.

RESPONSE (CONT.): INDICATOR A.VI.

The revised EASP amendment establishes policies and standards for the provision of public facilities and services to serve the EASP.

OBJECTIVE 10.5 – PHYSICAL INFRASTRUCTURE

Address long-term needs for physical infrastructure within the Envision Alachua Planning Area. All new residential development shall meet the requirements for adequate facilities as established or referenced in Objective 1.5, Future Land Use Element

Alachua County does not provide water or wastewater facilities.

This indicator of urban sprawl is not present in the revised EASP plan amendment.

A. PRIMARY SPRAWL INDICATORS (163.3177(6)(a) 9.(a), F.S.)

STAFF COMMENT

This indicator was not specifically addressed in the preliminary staff comments.

INDICATOR:

A.VII. *Fails to maximize use of future public facilities and services.*

RESPONSE

Future public facilities and services planned and programmed within the Alachua County Comprehensive Plan are specifically designed to accommodate the current framework of the Plan and do not establish additional excess capacity that would be available for future development outside of the framework of the adopted Plan. This indicator is not applicable to this amendment.

A. PRIMARY SPRAWL INDICATORS (163.3177(6)(a) 9.(a), F.S.)

STAFF COMMENT

The proposed amendment lacks any specific policies requiring provision of public facilities and services and, 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 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).

INDICATOR:

A.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.

RESPONSE

The revised EASP amendment insures a compact and efficient development form that does not increase the cost in time, money, and energy of providing and maintaining facilities and services and includes a variety of policies that are designed to achieve significant economic progress and that results in a development pattern that consumes as a whole fewer resources than conventional suburban development patterns, including reduced consumption of energy (through a reduction of vehicle miles travelled), land and water supply.

Policy 10.2.6.1 EA-EOMU Statement of Land Use Efficiencies

The state and regional goals achieved through the Envision Alachua Sector Plan are made possible by the efficiencies of energy, land and water achieved by the functional placemaking components of the EA-EOMU. The County recognizes that concentration of development in key areas in order to accommodate large-scale employment centers and conservation of significant natural lands as EA-PRES, EA-CON and as Open Space (as defined in Policies 10.3.3.3.b and 10.3.4.3.b), prevents urban sprawl, supports the creation of compact, mixed-use development and is determined to be of overriding public interest. Therefore, in order to achieve these purposes, limited impacts to natural systems and wetlands within the EA-EOMU may occur to the extent they are authorized by the policies of Objective 10.3 and state and federal environmental permits.

The land pattern policies are summarized in the response to Indicator III.

With regard to establishing policies, standards and provisions for public facilities, the amendment includes policies to address each of the applicable facilities as follows:

OBJECTIVE 10.5 – PHYSICAL INFRASTRUCTURE

Policy 10.5.1 Transportation

Policy 10.5.1.1 Transportation Facilities Intergovernmental Coordination

Policy 10.5.1.2 Transportation Capital Improvements

Policy 10.5.2 Potable Water and Sanitary Sewer Centralized Services

Policy 10.5.2.1 Potable Water and Sewer Service Facilities Intergovernmental Coordination

Policy 10.5.2.2 Potable Water Service Capital Improvements

Policy 10.5.2.3 Sanitary Sewer Service Capital Improvements

Policy 10.5.3 Stormwater Level of Service Standard

Policy 10.5.3.1 Stormwater Facilities Intergovernmental Coordination

Policy 10.5.3.2 Stormwater Capital Improvements

RESPONSE (CONT.): INDICATOR A.VIII.

<u>Policy 10.5.4</u>	<u>Public School Facilities</u>
<u>Policy 10.5.4.1</u>	<u>Public School Facilities Intergovernmental Coordination</u>
<u>Policy 10.5.4.2</u>	<u>Public School Facilities Capital Improvements</u>
<u>Policy 10.5.5</u>	<u>Recreation and Open Space</u>
<u>Policy 10.5.5.1</u>	<u>Recreation Facilities Intergovernmental Coordination</u>
<u>Policy 10.5.5.2</u>	<u>Recreation Facilities Capital Improvements</u>
<u>Policy 10.5.6</u>	<u>Police, Fire and Emergency Medical Services Protection</u>
<u>Policy 10.5.6.1</u>	<u>Public Safety Intergovernmental Coordination</u>
<u>Policy 10.5.6.2</u>	<u>Public Safety Capital Improvements</u>
<u>Policy 10.5.7</u>	<u>Solid Waste</u>
<u>Policy 10.5.7.1</u>	<u>Solid Waste Intergovernmental Coordination</u>
<u>Policy 10.5.7.2</u>	<u>Solid Waste Facilities Capital Improvements</u>
<u>Policy 10.5.8</u>	<u>Infrastructure Financing</u>

This indicator of urban sprawl is not present in the revised EASP plan amendment.

A. PRIMARY SPRAWL INDICATORS (163.3177(6)(a) 9.(a), F.S.)

STAFF COMMENT

The proposed amendment also fails to provide a clear separation between urban and rural uses. (Urban Sprawl Indicator VI [sic]) There are enclaves within the EA-EOMU area that would remain rural and under the County's current regulations without adequate data to support surrounding rural uses with dense urban uses.

INDICATOR:

A.IX. Fails to provide a clear separation between rural and urban uses.

RESPONSE

The amendment establishes specific policies and standards to protect rural edges and separate the rural adjacencies from the urban development of the EA-EOMU Job Centers.

Policy 10.3.3.5 SR 20 Job Center Protection of Rural Edges

Development within the SR 20 Job Center shall be designed to protect and separate the urban uses of the SR 20 Job Center from areas outside the EASP as well as adjacent preservation or conservation lands. The developed lands within the SR 20 Job Center shall be located and managed in a manner that helps to create and maintain such edges. The edge conditions shall be managed based upon the following standards:

- a. There shall be no extension of water and sewer utility services from within the SR 20 Job Center to areas outside of the EASP.
- b. Development shall be served by a connected internal street network that is designed to reduce the travel time for internal EASP travel between the SR 20 Job Center and the US 301 Job Center in order to limit EASP internal trips through Windsor.
- c. Future development within the SR 20 Job Center that is immediately adjacent to lands assigned the Rural/Agriculture Future Land Use Category shall be comparable to the built adjacent residential development, or be consistent with those uses allowed by the adopted Comprehensive Plan, or shall be separated from the property boundary by a natural buffer of at least 100' in width. 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
- d. Future development within the SR 20 Job Center adjacent to lands in public ownership and protected by a conservation easement as of the adoption date of this amendment shall be separated by a natural buffer of at least 50'.

Policy 10.3.4.5 US 301 Job Center Protection of Rural Edges

Development within the US 301 Job Center shall be designed to protect and separate the urban uses of the US 301 Job Center from areas outside the EASP as well as adjacent preservation or conservation lands. The developed lands within the US 301 Job Center shall be located and managed in a manner that helps to create and maintain such edges. The edge conditions shall be managed based upon the following standards:

- a. There shall be no extension of water and sewer utility services from within the US 301 Job Center to areas outside of the EASP.

RESPONSE (CONT.): INDICATOR A.IX.

- b. Development shall be served by a connected internal street network such that the use of existing rural roads outside the boundaries of the EASP are not required or convenient for internal travel.
- c. Future development within the US 301 Job Center that is immediately adjacent to lands assigned the Rural/Agriculture Future Land Use Category shall be comparable to the built adjacent residential development, or be consistent with those uses allowed by the adopted Comprehensive Plan, or shall be separated from the property boundary by a natural buffer of at least 100' in width. 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. Property located on the opposite side of US 301 shall not be considered to be adjacent.
- d. Future development within the US 301 Job Center adjacent to lands in public ownership and protected by a conservation easement as of the adoption date of this amendment shall be separated by a natural buffer of at least 50'.

This indicator of urban sprawl is not present in the revised EASP plan amendment.

B. FORM DISCOURAGING SPRAWL (163.3177(6)(a) 9.(b), F.S.)

STAFF COMMENT

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 every 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.

CRITERION:

B.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.

RESPONSE

The Environmental Data & Analysis document prepared for the revised EASP amendment by Breedlove, Dennis & Associates, Inc. includes the following vision for protecting the natural resources and ecosystems within the EASP as developed by through the Envision Alachua planning process activities, including Task Force meetings, Technical Advisory Group meetings, and Community Workshops.

Environmental Vision: Support the development of communities that have a balanced and compatible mix of land uses and environmentally sustainable development practices while conserving lands to protect ecosystems, wildlife corridors, and working landscapes.

Environmental Conservation Goal: Protect and retain lands for conservation, habitat protection, and wildlife connectivity.

The Envision Alachua Sector Plan spells out very few policies in only specified and relatively small areas that differ from the requirements of the Comprehensive Plan. Exceptions are made only for job generating development and road crossings. In those limited circumstances, the environmental protection afforded by the EASP must meet all state and federal environmental requirements. The impacts to wetlands will be subject to state and federal permitting requirements and area limited to no more than 400 acres (2.3%) in total, out of an estimated 17,200 acres of wetlands in the EASP. In the case of the County's strategic ecosystem policies, the EASP provides more acreage under protection and in a more sustainable pattern than a strict interpretation of the County's plan. In the case of the County's strategic ecosystem policies, the EASP lands not currently protected by a conservation easement and not proposed as EA-Rural use, that are located within a Strategic Ecosystem on Map 4, shall be considered as a total parcel area of 25,088 acres. Within this parcel there are approximately 16,658 acres of upland within seven (7) Strategic Ecosystems, of which a minimum of 13,401 acres (80%) will remain undeveloped. Within six (6) Strategic Ecosystems, 100% of the uplands will remain undeveloped, and within one Strategic Ecosystem (Lochloosa Creek Flatwoods) at least 47% will remain undeveloped.

RESPONSE (CONT.): CRITERION B.I

The policy framework that has been proposed ensures that this opportunity is fully realized by the amendment and that the policies 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 through the following strategies:

1. Establish specific Future Land Use Map Designations for Preservation and Conservation Lands.

Of the approximately 52,745 acres included in the EASP amendment, at least 47,403 acres (89%) will be maintained as Preservation, Conservation or Open Space lands. The proposed amendment establishes a Preservation (EA-PRES) future land use designation on 3,538 acres of land and a Conservation (EA-CON) future land use designation on 41,691 acres of land. These land use designations are both expressly delineated on the future land use map (as opposed to being defined by textual description and designated piecemeal after the fact) and which protects those lands by prohibiting residential uses, prohibiting transfers of density from these lands and limiting the uses within these areas.

2. Require a deed restriction for Preservation and Conservation lands that sets forth the land use limitations of each future land use designation within 90 days of the effective date of the EASP.

Policy 10.2.3.2 EA-PRES Deed Restrictions

Within 90 days of effective date of the EASP, a deed restriction shall be filed for lands within EA-PRES that sets forth the land use limitations as provided in the EA-PRES future land use category. This deed restriction shall remain in effect until such time as 1) the County reduces the development program of the EASP without the consent of the landowner or 2) the land owner provides formal notice to the County of abandonment of the EASP or 3) is replaced by a conservation easement applicable to the same property. The deed restriction shall include enforcement provisions providing standing to enforce to a non-governmental non-profit conservation organization.

Policy 10.2.4.2 EA-CON Deed Restrictions

Within 90 days of effective date of the EASP, a deed restriction shall be filed for lands within EA-CON that do not have a conservation easement in place on the date of the adoption of the EASP that sets forth the land use limitations as provided in the EA-CON future land use category. This deed restriction shall remain in effect until such time as 1) the County reduces the development program of the EASP without the consent of the landowner or 2) the land owner provides formal notice to the County of abandonment of the EASP or 3) is replaced by a conservation easement applicable to the same property. The deed restriction shall include enforcement provisions providing standing to enforce to a non-governmental non-profit conservation organization.

3. Require Conservation Easements for all lands protected from development, not just for those areas preserved as “permanent preservation.”

Policy 10.4.1.1 Timing of Conservation Easements (PARTIAL EXCERPT)

Conservation easements within the EASP will be required as a part of each specific DSAP approval process as follows:

- a. Permanent Preservation Areas. A conservation easement shall be provided for EA-PRES land areas at the time of approval of the first DSAP. Said conservation easement shall be provided and will be transferred to the St. Johns River Water Management District and to a qualified conservation organization acceptable to the County and experienced in holding and maintaining conservation easements, subject to their acceptance after review and approval of the easement as to form and content.
- b. Permanent Conservation Areas. A conservation easement shall be provided at the time of individual development plan approval for EA-CON lands in the DSAP that are not covered by a conservation easement in direct proportion to the percentage of the nonresidential development proposed in the DSAP relative to the total amount of nonresidential development authorized in Policy 10.3.1 or the percentage of residential units proposed in the DSAP relative to the total number of residential units authorized in Policy 10.3.1, whichever percentage is greater. Said conservation easement shall be provided and will be transferred to the St. Johns River Water Management District and to a qualified conservation organization acceptable to the County and experienced in holding and maintaining conservation easements, subject to their acceptance after review and approval of the easement as to form and content. For subsequent DSAP applications, the minimum requirement shall be evaluated as a cumulative proportional relationship.

4. Establish DSAP minimum requirements that insure that there is a proportional relationship between the lands that will be protected through conservation easements to the total development program that is included in each DSAP. (See Policy 10.4.1.1 Excerpt above).

5. Establish specific provisions for natural resource protection for wetlands that insures that there will be no net loss of wetland function. Impacts to natural systems and wetlands are limited, but they are permitted to accommodate the overriding public interest of creating large-scale employment centers that are designed as compact, multi-use and walkable communities. The filling of wetlands for such a purpose is specifically limited to a maximum of 400 acres over the entire EASP.

Policy 10.3.3.4 SR 20 Job Center Natural Resources Protection (partial excerpt)

a. Wetlands Protection

- i. Wetlands are defined as those areas regulated as jurisdictional wetlands by the State of Florida as of the date of adoption of this amendment.
- ii. The SR 20 Job Center shall be designed such that there will be no net loss of wetland function.
- iii. The County recognizes and determines that the concentration of development within the SR 20 Job Center to accommodate a large-scale employment center is of overriding public interest. Therefore limited impacts to natural systems and wetlands within the SR 20 Job Center are permitted to the extent authorized by state and federal permits, and shall be limited by Policy 10.4.2.1.
- iv. Wetland acreage and function within the SR 20 Job Center shall be protected through compliance with state and federal environmental permitting requirements. Obtaining the appropriate state and federal environmental permits and compliance with the policies of Objective 10 of the Future Land Use Element shall constitute compliance with the Comprehensive Plan and the land development regulations of Alachua County for the purposes of wetland protection. To minimize encroachment into wetland areas, existing forestry roadways shall be given priority in design, street layout and siting considerations.

b. Wetlands Buffers

Wetland ecosystems protected as provided in Policy 10.3.3.4.a. shall be further protected from potential development impacts by buffers with minimum widths established in Policy 10.4.1.3.

c. Mitigation

Any development activity permitted within an onsite, or affecting an offsite, wetland or buffer shall be mitigated in accordance with state and federal environmental permit requirements.

Policy 10.4.2.1 Wetlands Protection

The provisions of the Alachua County Comprehensive Plan relating to wetlands protection, and associated implementing regulations, shall be applicable to EA-RUR and EA-CON. Standards relating to wetland protection for EA-EOMU shall be as provided in Policies 10.3.3.4, and 10.3.4.4. and standards for EA-PRES shall be as provided in Policy 10.2.3. In no event shall the filling of wetlands exceed a total of 400 acres within the entire EASP without approval of the County.

Policy 10.3.4.4 US 301 Job Center Natural Resources Protection (Partial Excerpt)

a. Wetlands Protection

- i. Wetlands are defined as those areas regulated as jurisdictional wetlands by the State of Florida as of the date of adoption of this amendment.
- ii. The US 301 Job Center shall be designed such that there will be no net loss of wetland function.
- v. The County recognizes and determines that the creation of development within the US 301 Job Center to accommodate rail-based advanced manufacturing is of overriding public interest. Therefore, limited impacts to natural systems and wetlands for the purpose of advanced manufacturing facilities, creating rail spurs, and for the construction of internal roads and road connections are permitted to the extent authorized by state and federal permits and shall be limited by Policy 10.4.2.1.
- iii. Wetland acreage and function within the US 301 Job Center shall be protected through compliance with state and federal environmental permitting requirements. Obtaining the appropriate state and federal environmental permits and compliance with the policies of Objective 10 of the Future Land Use Element shall constitute compliance with the Comprehensive Plan and the land development regulations of Alachua County for the purposes of wetland protection. To minimize encroachment into wetland areas, existing forestry roadways shall be given priority in design, street layout and siting considerations.

b. Wetlands Buffers

Wetland ecosystems protected as provided in Policy 10.3.4.4.a. shall be further protected from potential development impacts by buffers with minimum widths established in Policy 10.4.1.3.

c. Mitigation

Any development activity permitted within an onsite, or affecting an offsite, wetland or buffer shall be mitigated consistent with state and federal environmental permit requirements.

RESPONSE (CONT.): CRITERION B.I

6. Establish specific provisions for natural resource protection for water resources.

Policy 10.4.3.1 Water Supply Strategy

The lands within the EASP shall be managed and developed to incorporate state of the art water conservation, treatment and delivery technology as defined by the following water supply strategy components:

- a. Use conservation-first strategies within the EA-EOMU for water supply that recognizes supply limitations and reflects the value of the resource;
- b. The use of large water storage facilities for water harvesting and capture shall be encouraged;
- c. State-of-the-art system components (e.g., water recycling) shall be incorporated where appropriate and feasible;
- d. The priority for the use of reclaimed water shall be given to environmental restoration projects, industrial users and agricultural users;
- e. All wells within the EA-EOMU and the EA-RUR shall be monitored as part of a utility system;
- f. The use of "Florida Friendly" plant species shall be required for landscaping within the EA-EOMU, with a preference for native species.

The first criterion 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" has been met by the revised EASP amendment.

B. FORM DISCOURAGING SPRAWL (163.3177(6)(a) 9.(b), F.S.)

STAFF COMMENT

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. Due to the distances from existing urban services and the environmental sensitivity of the area, extension of urban services to this 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.

CRITERION:

B.II. Promotes the efficient and cost-effective provision or extension of public infrastructure and services.

RESPONSE

The amendment insures a compact and efficient development form that does not increase the cost in time, money, and energy of providing and maintaining facilities and services and includes a variety of policies that are designed to achieve significant economic progress and that consumes as a whole fewer resources than conventional suburban development patterns, including reduced consumption of energy (through a reduction of vehicle miles travelled), land and water supply.

Policy 10.2.6.1 EA-EOMU Statement of Land Use Efficiencies

The state and regional goals achieved through the Envision Alachua Sector Plan are made possible by the efficiencies of energy, land and water achieved by the functional placemaking components of the EA-EOMU. The County recognizes that concentration of development in key areas in order to accommodate large-scale employment centers and conservation of significant natural lands as EA-PRES, EA-CON and as Open Space (as defined in Policies 10.3.3.3.b and 10.3.4.3.b), prevents urban sprawl, supports the creation of compact, mixed-use development and is determined to be of overriding public interest. Therefore, in order to achieve these purposes, limited impacts to natural systems and wetlands within the EA-EOMU may occur to the extent they are authorized by the policies of Objective 10.3 and state and federal environmental permits.

The land pattern policies are summarized in the response to Indicator III.

With regard to establishing policies, standards and provisions for public facilities, the revised EASP amendment addresses the provision of adequate infrastructure and does not allow development if there are service or infrastructure deficiencies. The amendment includes policies to address each of the applicable facilities as follows:

OBJECTIVE 10.5 – PHYSICAL INFRASTRUCTURE

Address long-term needs for physical infrastructure within the Envision Alachua Planning Area. All new residential development shall meet the requirements for adequate facilities as established or referenced in Objective 1.5, Future Land Use Element.

Policy 10.5.1 Transportation

Policy 10.5.1.1 Transportation Facilities Intergovernmental Coordination

Policy 10.5.1.2 Transportation Capital Improvements

Policy 10.5.2 Potable Water and Sanitary Sewer Centralized Services

Policy 10.5.2.1 Potable Water and Sewer Service Facilities Intergovernmental Coordination

Policy 10.5.2.2 Potable Water Service Capital Improvements

Policy 10.5.2.3 Sanitary Sewer Service Capital Improvements

RESPONSE (CONT.): CRITERION B.II.

Policy 10.5.3 Stormwater Level of Service Standard
Policy 10.5.3.1 Stormwater Facilities Intergovernmental Coordination
Policy 10.5.3.2 Stormwater Capital Improvements
Policy 10.5.4 Public School Facilities
Policy 10.5.4.1 Public School Facilities Intergovernmental Coordination
Policy 10.5.4.2 Public School Facilities Capital Improvements
Policy 10.5.5 Recreation and Open Space
Policy 10.5.5.1 Recreation Facilities Intergovernmental Coordination
Policy 10.5.5.2 Recreation Facilities Capital Improvements
Policy 10.5.6 Police, Fire and Emergency Medical Services Protection
Policy 10.5.6.1 Public Safety Intergovernmental Coordination
Policy 10.5.6.2 Public Safety Capital Improvements
Policy 10.5.7 Solid Waste
Policy 10.5.7.1 Solid Waste Intergovernmental Coordination
Policy 10.5.7.2 Solid Waste Facilities Capital Improvements

Policy 10.6.4 DSAP Minimum Requirements (Partial Excerpt)

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 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.

The amendment also provides clear direction for the financing of the capital cost of public facilities to be established at the time of each DSAP, to be from a non-general fund revenue source and reserves the County's right to deny or condition the approval of a DSAP if adequate funding is not available for the necessary infrastructure to support the development.

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.
- 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.

Policy 10.6.6 Infrastructure Financing Minimum Requirements

The County reserves the right to deny a DSAP or condition the approval of development if adequate funding is not available for the necessary infrastructure to support the proposed development.

The second criterion that the amendment "Promotes the efficient and cost-effective provision or extension of public infrastructure and services" has been met by the revised EASP amendment.

B. FORM DISCOURAGING SPRAWL (163.3177(6)(a) 9.(b), F.S.)

STAFF COMMENT

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 Area A with a walkable, mixed-use town center but the proposed design policies are general and would not necessarily result in a walkable community, especially as there are no proposed phasing requirements within DSAP development. The policies for the other areas (B, C, D, and E) do not require the same mix of uses in proximity to each other that would provide the mix of uses and compactness that would meet this criterion and are no policies to direct how the mobility between these separated sub-areas would be accomplished.

CRITERION:

B.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.

RESPONSE

The urban development portion of the EASP is provided in the form of a mixed-use land use category that is proposed to function as distinct urban cluster under the Alachua County Comprehensive Plan and the proposed standards for the patterns of development within the EASP do not permit radial, strip, ribbon patterns of development.

The proposed policies include specific standards that address the form of development to be provided in the EA-EOMU that include standards that address the patterns of development and maintain the principles of walkability.

Policy 10.3.2.2 EA-EOMU Circulation and Connectivity
Development with the EA-EOMU shall provide for interconnected, mixed-use development through specific site and design standards that create pedestrian and bicycle friendly communities, reduce per capita greenhouse gas emissions and vehicular trips on external roadways, and provide development patterns that are transit supportive.

The proposed policies also include standards that focus on the functional relationships between the mix of uses, including residential uses and employment, supporting commercial uses, recreation and open spaces and includes specific distance standards between these important uses to facilitate multi-modal transportation opportunities including walking, biking and transit.

Policy 10.3.2 EA-EOMU Design Standards - General
Site and building design, including scale, shall create a pedestrian-, bicycle- and transit-friendly environment. Architectural and site design techniques shall be used to promote walkable and bikeable communities.

- a. The site design shall conform to a compact development pattern, with opportunities for shopping and workplaces near residential neighborhoods;
- b. The site layout and orientation of buildings shall create a development that is designed around the pedestrian and bicyclist, creates an environment that promotes walking and bicycling as an alternative means of mobility, accommodates transit and connects activities within the EA-EOMU;
- c. Development shall be served by a connected internal street network such that use of existing rural roads is not required or convenient for internal travel.
- d. The location of residential uses within each sub-area of the EA-EOMU will ensure that a majority of housing is within a 1 / 2 mile radius of non-retail employment uses.
- e. The location of employment uses with the EA-EOMU will ensure that a majority of jobs created shall be located within a 1 / 2 mile radius of future transit access for a transit connection to east Gainesville or Hawthorne.

RESPONSE (CONT.): CRITERION B.III

Policy 10.3.2.3 EA-EOMU Access to Civic Uses

The EA-EOMU shall include provisions to insure accessibility to civic uses as follows:

- a. The location of residential uses within the EA-EOMU will ensure that all residential uses are within a ¼ mile radius of recreation, open space or conservation lands;
- b. Food production shall be encouraged at the parcel level and some open spaces shall be adequately sized to accommodate community gardens;
- c. The County shall support the development of markets and programs within the EA-EOMU that promote the sale of locally produced agricultural goods, including but not limited to farmers markets, community gardens, farm to institution programs, and agritourism opportunities. The County shall partner with local community groups and organizations and other local governments to pursue funding sources for the development of a sustainable local food system.

In addition to the general policies for EA-EOMU, each Job Center has additional requirements for minimum densities and intensities of development and the SR 20 Job Center has an additional requirement for a Mixed Use Research Park.

Policy 10.3.3.2 SR 20 Job Center Permitted Uses/Density/Intensity

Lands designated within the SR 20 Job Center shall be permitted the full range of uses as described in Policy 10.2.6.

- a. SR 20 Job Center densities and intensities

Use	Density (Dwelling Units / Gross Residential Acre) ²		Intensity FAR ²	
	Min	Max	Min	Max
<i>Mixed Use Research Park</i>				
R&D / Office	n/a	(1)	0.50	2.00
Commercial	n/a	(1)	n/a	2.00
Residential	20 DU/AC	45 DU/AC		
<i>Outside Mixed Jobs Use Center</i>				
R&D / Office	n/a	(1)	0.20	0.50
Advanced Manufacturing	n/a	n/a	0.15	0.50
Commercial	n/a	n/a	0.20	0.35
Residential	3.0 DU/AC	7.0 DU/AC		

(1) There is no maximum density within vertically mixed use structures. The maximum residential development is limited by the overall development program.

(2) Density/Intensity as calculated over the total acreage developed for each specified use within the SR 20 Job Center.

- b. SR 20 Job Center Mixed Use Research Park

The SR 20 Job Center shall include a Mixed Use Research Park. The Mixed Use Research Park shall be a minimum of 300 contiguous acres and shall provide for a focused hub of urban development that includes a mix of both residential and non-residential uses. The Mixed Use Research Park shall require mixed-use development with active ground-floor uses focused along primary streets and available access to public transit, providing a compatible mix of employment, housing, shopping, and community civic uses, which will serve as a focal point for the SR 20 Job Center. The Mixed Use Research Park shall be located within 1.25 miles of SR 20

RESPONSE (CONT.): CRITERION B.III.

Policy 10.3.4.2 US 301 Job Center Permitted Uses / Density / Intensity

Lands designated within the US 301 Job Center shall be permitted the full range of uses as described in Policy 10.2.6 with the densities and intensities as described below.

Use	Density (Dwelling Units / Gross Residential Acre) ²		Intensity FAR ²	
	Min	Max	Min	Max
<u>R&D / Office</u>	<u>n/a</u>	<u>(1)</u>	<u>0.20</u>	<u>1.00</u>
<u>Advanced Manufacturing</u>	<u>n/a</u>	<u>n/a</u>	<u>0.15</u>	<u>2.00</u>
<u>Commercial</u>	<u>7.0</u> <u>DU/AC</u>	<u>15 DU/AC</u>	<u>0.20</u>	<u>1.00</u>
<u>Residential</u>	<u>2.0</u> <u>DU/AC</u>	<u>7.0</u> <u>DU/AC</u>		

(1) There is no maximum density within vertically mixed use structures. The maximum residential development is limited by the overall development program.

2) Density / Intensity as calculated over the total acreage developed for each specified use within the US 301 Job Center.

The proposed policies include a linkage standard between jobs and housing and further requires that each Detailed Specific Area Plan (DSAP) include a phasing plan to assure compliance with the jobs to housing balance, which shall link increments of non-residential development to a maximum number of dwelling units allowed within each phase of development.

Policy 10.2.6.3 EA-EOMU Jobs to Housing Balance

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:

- c. Achieve a jobs-to-housing balance of 3 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).
- d. Measurement for achieving the jobs-to-housing balance shall be based upon the following:
 - iii. The jobs-to-housing balance shall be measured for development within each DSAP based upon the assumptions that the average amount of floor area per employee by land use is:

<u>R&D / Office</u>	<u>3.6 Employees / KSF or 1 Employee per 275 SF</u>
<u>Commercial</u>	<u>2.2 Employees / KSF or 1 Employee per 450 SF</u>
<u>Advanced Manufacturing</u>	<u>1.0 Employees / KSF or 1 Employee per 1,000 SF</u>

KSF = 1000 square feet of gross floor area, SF = square feet of gross floor area.

- iv. To promote an appropriate jobs to housing mix and the timing of residential and nonresidential uses during the development of the EA-EOMU areas of the EASP, the following requirements shall be met:
 - (c) Each DSAP shall be required to provide a phasing plan to assure compliance with the jobs to housing balance, which shall link increments of non-residential development to a maximum number of dwelling units allowed within each phase of development.
 - (d) Until a minimum of 1,000,000 square feet of non-residential development has been constructed or is under construction, residential development shall be limited to a maximum of 1,000 dwelling units that may be authorized to commence construction.

The County shall not accept a DSAP for filing if these minimum requirements are not met.

RESPONSE (CONT.): CRITERION B.III.

This linkage policy establishes a standard for the phasing of development that will support and reinforce the proposed and desired mix of uses.

Policy 10.3.3.3 SR 20 Job Center Mix of Uses (PARTIAL EXCERPT)

a. Composite Land use Mix.

The SR 20 Job Center shall be developed to accommodate a composite land use mix as described below.

	<u>Minimum</u>	<u>Maximum</u>
<u>Open Space (1)</u> <i>(Percentage of SR 20 Job Center Total Acres)</i>		
	<u>50%</u>	<u>(1)</u>
<u>Area Net of Open Space</u> <i>(Percentage of SR 20 Job Center Total Acres net of open space)</i>		
<u>R&D / Office</u>	<u>15%</u>	<u>30%</u>
<u>Manufacturing</u>	<u>0%</u>	<u>20%</u>
<u>Commercial</u>	<u>1%</u>	<u>20%</u>
<u>Residential</u>	<u>40%</u>	<u>75%</u>
<u>Recreation (2)</u>	<u>5%</u>	<u>---</u>
<u>Civic</u>	<u>5%</u>	<u>---</u>

Policy 10.3.4.3 US 301 Job Center Mix of Uses (PARTIAL EXCERPT)

a. Composite Land Use Mix

The US 301 Job Center shall be developed to accommodate a composite land use mix as described below.

	<u>Minimum</u>	<u>Maximum</u>
<u>Open Space (1)</u> <i>(Percentage of US 301 Job Center Total Acres)</i>		
	<u>30%</u>	<u>(1)</u>
<u>Buildable Area</u> <i>(Percentage of US 301 Job Center Total Buildable Acres)</i>		
<u>Commercial</u>	<u>0%</u>	<u>10%</u>
<u>R&D / Office</u>	<u>0%</u>	<u>10%</u>
<u>Manufacturing</u>	<u>25%</u>	<u>50%</u>
<u>Residential</u>	<u>25%</u>	<u>60%</u>
<u>Recreation (2)</u>	<u>5%</u>	<u>---</u>
<u>Civic</u>	<u>7%</u>	<u>---</u>

The third criterion that the amendment “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” has been met by the revised EASP amendment.

B. FORM DISCOURAGING SPRAWL (163.3177(6)(a) 9.(b), F.S.)

STAFF COMMENT

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 beyond what would be allowed today. 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 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.

CRITERION:

B.IV. Promotes conservation of water and energy.

RESPONSE

Florida Statutes Section 163.3177(6) (a) 9.b. states that a 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 eight specific criterion of development form. Criterion B.IV, promotes conservation of water and energy is a statement related to the urban form of the EASP amendment.

The revised EASP amendment insures a compact and efficient development form that promotes the conservation of water and energy and includes a variety of policies that are designed to achieve significant economic progress and that consumes as a whole fewer resources than conventional suburban development patterns, including reduced consumption of energy (through a reduction of vehicle miles travelled), land and water supply.

Policy 10.2.6.1 EA-EOMU Statement of Land Use Efficiencies
The state and regional goals achieved through the Envision Alachua Sector Plan are made possible by the efficiencies of energy, land and water achieved by the functional placemaking components of the EA-EOMU. The County recognizes that concentration of development in key areas in order to accommodate large-scale employment centers and conservation of significant natural lands as EA-PRES, EA-CON and as Open Space (as defined in Policies 10.3.3.3.b and 10.3.4.3.b), prevents urban sprawl, supports the creation of compact, mixed-use development and is determined to be of overriding public interest. Therefore, in order to achieve these purposes, limited impacts to natural systems and wetlands within the EA-EOMU may occur to the extent they are authorized by the policies of Objective 10.3 and state and federal environmental permits.

The land pattern policies are summarized in the response to Criterion B.III.

The revised amendment also includes specific policies related to water resource protection as follows.

OBJECTIVE 10.4.3 – WATER RESOURCE PROTECTION

Address long-term needs for water supply, water quality and water conservation within the Envision Alachua Planning Area based upon overall system stewardship and conservation of water.

Policy 10.4.3.1 Water Supply Strategy

The lands within the EASP shall be managed and developed to incorporate state of the art water conservation, treatment and delivery technology as defined by the following water supply strategy components:

- a. *Use conservation-first strategies within the EA-EOMU for water supply that recognizes supply limitations and reflects the value of the resource;*
- b. *The use of large water storage facilities for water harvesting and capture shall be encouraged;*
- c. *State-of-the-art system components (e.g., water recycling) shall be incorporated where appropriate and feasible;*
- d. *The priority for the use of reclaimed water shall be given to environmental restoration projects, industrial users and agricultural users;*
- e. *All wells within the EA-EOMU and the EA-RUR shall be monitored as part of a utility system;*
- f. *The use of “Florida Friendly” plant species shall be required for landscaping within the EA-EOMU, with a preference for native species*

Policy 10.4.3.2 Stormwater as a Water Source

Stormwater shall be treated as a resource that will be an integral element of the total water source system. The capture of treated stormwater for reuse and groundwater recharge purposes will be evaluated to determine how it can be used as efficiently as possible considering timing of the various resource options and partnerships within the region.

Policy 10.4.3.3 Wastewater as a Water Source

Wastewater shall be treated as a resource that will be an integral element of the total water source system. The capture of treated wastewater for reuse and groundwater recharge purposes will be evaluated to determine how it can be used as efficiently as possible considering timing of the various resource options and partnerships within the region.

In addition to the policies included in the revised EASP amendment, Plum Creek has consistently supported and suggested additional policies to address specific water conservation measures that would ensure the water quality and supply for these lands can be managed and sustained over the long term. Due to concerns expressed by County staff regarding the County’s authority and capacity to legally enforce some of these limitations, Plum Creek will place these restrictions in recorded, legally enforceable deed restrictions and covenants, including:

- Prohibiting use of drinking and reclaimed water for residential irrigation
- Achieving 100-percent water reclamation
- Requiring all agriculture to use current BMP’s, including water conservation measures
- Limiting wells within the developed land strictly to those that are part of a utility system.

The fourth criterion that the amendment “*Promotes conservation of water and energy*” has been met by the revised EASP amendment.

B. FORM DISCOURAGING SPRAWL (163.3177(6)(a) 9.(b), F.S.)

STAFF COMMENT

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 23,000 acres of silviculture under conservation easements that would allow continued agriculture operations but no residential development or commercial development. The 11,393 acres in the EA-EOMU that is currently in silviculture would be developed and, therefore, these agricultural areas and activities will not be preserved.

CRITERION:

B.V. Preserves agricultural areas and activities, including silviculture, and dormant, unique, and prime farmlands and soils.

RESPONSE

The revised EASP amendment permits agricultural and silvicultural uses within the EA-RUR (1,961 acres) and the EA-EOMU land use classifications. Agricultural and silvicultural uses are also permitted with limitations within the EA-CON land use classification which includes an additional 18,826 acres of land that are proposed to be placed under conservation easement as a part of the EASP.

The amendment retains Rural/Agricultural Lands in locations that maintain and enhance the rural development form and landscape that define the edges of the urbanizing areas. The amendment continues to permit agricultural and silvicultural uses within the EA-CON with limitations. All lands within the Envision Alachua Sector Plan currently use best management practices certified by the Sustainable Forestry Initiative (SFI). SFI uses 115 science-based indicators and certification is conducted by independent third-party auditors. SFI standards require protection of wildlife habitats, biodiversity, water quality and soil quality of our forests. Although SFI standards allow clear-cut harvest of up to 250 acres at one time, Plum Creek averages less than 70 acres per clear cut. SFI standards require that the area be replanted within 18 months.

Plum Creek has indicated its willingness to use alternative forestry practices on lands within the EASP that are not currently subject to a conservation easement in order to further protect water quality standards. Due to legal concerns expressed by County staff, rather than include such standards in the proposed amendment, Plum Creek will consider placing requirements for alternative forestry practices in recorded deed restrictions, legally enforceable by the County and a third party environmental organization.

The fifth criterion that the amendment “*Preserves agricultural areas and activities, including silviculture, and dormant, unique, and prime farmlands and soils*” has been met by the revised EASP amendment.

B. FORM DISCOURAGING SPRAWL (163.3177(6)(a) 9.(b), F.S.)

STAFF COMMENT

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.

CRITERION:

B.VI. Preserves open space and natural lands and provides for public open space and recreation needs.

RESPONSE

Of the approximately 52,745 acres included in the EASP amendment, at least 47,403 acres (89%) will be maintained as Preservation, Conservation or Open Space lands. In addition, a minimum of 5% of the lands assigned EA-EOMU (a minimum of 188 acres) is required to be Recreation lands.

Recreation needs are further addressed by specific policies and guidelines that describe how a future parks master plan will be established for this area consistent with the timing and needs of residential development of the area.

Policy 10.5.5 Recreation and Open Space

To provide adequate recreation and open space facilities to meet the needs of the EASP, the DSAP process shall ensure that new residential development shall meet all of the requirements for adequate facilities based on the level of service standards adopted in this Plan. The DSAP application shall include a Parks and Recreation Master Plan that establishes an urban standard of service for the residential portions of the EA-EOMU that is phased and coordinated with the construction of residential development within the EA-EOMU.

Policy 10.5.5.1 Recreation Facilities Intergovernmental Coordination

The timing and location of capital improvement projects shall be coordinated through the DSAP process for each phase of development with any affected municipalities in Alachua County, the School Board of Alachua County, the Regional Transit System (RTS), the Florida Department of Transportation (FDOT), other applicable state and federal permitting agencies and surrounding counties. A copy of each DSAP application shall be provided to reviewing agencies, adjacent cities and adjacent counties. 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

Policy 10.6.4 DSAP Minimum Requirements (PARTIAL EXCERPT)

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:

- 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

RESPONSE (CONT.): CRITERION B.VI.

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 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.

There are 47 strategic ecosystems mapped within Alachua County according to the Alachua County Ecological Inventory studies of 1987 and 1996. The Envision Alachua Sector Plan (EASP) includes 10 of these mapped strategic ecosystems. These include portions of the Austin Cary Flatwoods, Buck Bay Flatwoods, East Lochloosa Forest, Little Orange Creek, Lochloosa Creek, Lochloosa Creek Flatwoods, Lochloosa Forest Additions, Lochloosa Forest West, Lochloosa Slough, and Northeast Flatwoods. Of the 10 strategic ecosystems mapped within the EASP, nine (Austin Carrie Flatwoods, Buck Bay Flatwoods, East Lochloosa Forest, Little Orange Creek, Lochloosa Creek, Lochloosa Forest West, Lochloosa Forest Additions, Lochloosa Slough, and Northeast Flatwoods) are proposed for conservation in their entirety, with no land use change proposed, therefore exceeding the Comprehensive Plan policy 4.10.5 requirement that “Each strategic ecosystem shall be preserved as undeveloped area, not to exceed 50% of the upland portion of the property without landowner consent”.

The EASP lands not currently protected by a conservation easement and not proposed as EA-Rural use, that are located within a Strategic Ecosystem on Map 4, shall be considered as a total parcel area of 25,088 acres. Within this parcel there are approximately 16,658 acres of upland within seven (7) Strategic Ecosystems, of which a minimum of 13,401 acres (80%) will remain undeveloped. Within six (6) Strategic Ecosystems, 100% of the uplands will remain undeveloped, and within one Strategic Ecosystem (Lochloosa Creek Flatwoods) at least 47% will remain undeveloped.

The sixth criterion that the amendment “*Preserves open space and natural lands and provides for public open space and recreation needs*” has been met by the revised EASP amendment.

B. FORM DISCOURAGING SPRAWL (163.3177(6)(a) 9.(b), F.S.)

STAFF COMMENT

The proposed policies would require a mix of uses in Area A with an urban center. The other areas allow a mix of uses but would not require the same urban character and walkability.

CRITERION:

B.VII. *Creates a balance of land uses based upon demands of the residential population for the nonresidential needs of an area.*

RESPONSE

One of the key objectives of the EASP is to provide large-scale employment centers that are proximate to existing lower income residential areas in East Alachua County. During the Envision Alachua processes one of the issues that was identified was the current disparity between west Gainesville and east Gainesville with respect to income, jobs, access to quality education, and access to goods and services. The EASP focuses on creating an overall balance of land uses within the context of East Alachua County. Therefore the applicable policies, including the jobs to housing balance criteria, are designed to focus on the creation of jobs over residential – establishing opportunities for the existing residents to have access to jobs in close proximity to their homes.

The EA-EOMU is an urban land use designation that is proposed to function as an urban cluster and requires an overall development program, a mix of land uses (which are supported by minimum densities and intensities), as well as a jobs to housing balance standard that is designed to insure that the development creates a balance of land uses within the community in which it is being developed.

Policy 10.3.1 EA-EOMU Development Program

The standards for measuring the maximum development program permitted within the EA-EOMU shall be based upon the following:

a. Maximum Development Program.

Residential: 8,700 homes*

Non-residential: 11.2 million square feet**

(R&D/Office/Advanced Manufacturing/Commercial)

RESPONSE (CONT.): CRITERION B.VII.

The proposed policies include a linkage standard between jobs and housing and further requires that each Detailed Specific Area Plan (DSAP) include a phasing plan to assure compliance with the jobs to housing balance, which shall link increments of non-residential development to a maximum number of dwelling units allowed within each phase of development.

Policy 10.2.6.3 EA-EOMU Jobs to Housing Balance

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 3 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).
- b. Measurement for achieving the jobs-to-housing balance shall be based upon the following:
 - i. The jobs-to-housing balance shall be measured for development within each DSAP based upon the assumptions that the average amount of floor area per employee by land use is:

<u>R&D/Office</u>	<u>3.6 Employees / KSF or 1 Employee per 275 SF</u>
<u>Commercial</u>	<u>2.2 Employees/KSF or 1 Employee per 450 SF</u>
<u>Advanced Manufacturing</u>	<u>1.0 Employees / KSF or 1 Employee per 1,000 SF</u>

KSF = 1000 square feet of gross floor area, SF = square feet of gross floor area.

- ii. To promote an appropriate jobs to housing mix and the timing of residential and nonresidential uses during the development of the EA-EOMU areas of the EASP, the following requirements shall be met:
 - (a) Each DSAP shall be required to provide a phasing plan to assure compliance with the jobs to housing balance, which shall link increments of non-residential development to a maximum number of dwelling units allowed within each phase of development.
 - (b) Until a minimum of 1,000,000 square feet of non-residential development has been constructed or is under construction, residential development shall be limited to a maximum of 1,000 dwelling units that may be authorized to commence construction.

The County shall not accept a DSAP for filing if these minimum requirements are not met.

The amendment specifically prohibits a DSAP with single use residential uses within EA-EOMU.

Policy 10.6.4 DSAP Minimum Requirements (PARTIAL EXCERPT)

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:

- c. Land Use Mix. Identification of land use mix by phase. The EASP prohibits a DSAP with single use residential uses within EA-EOMU.

The seventh criterion that the amendment “Creates a balance of land uses based upon demands of the residential population for the nonresidential needs of an area” has been met by the revised EASP amendment.

B. FORM DISCOURAGING SPRAWL (163.3177(6)(a) 9.(b), F.S.)

STAFF COMMENT

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.

CRITERION:

B.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](#)*

RESPONSE

The currently adopted future land use designation for the area covered by the EASP permits a residential density of 1 dwelling unit per 5 acres. Although the ACCP provides for various limitations on timing of such development, the Plan currently permits the development of single use residential development over large expanses of land. Even if such residential development were ‘clustered’ as is identified in the Plan as the preferred design for new rural residential subdivisions, such development would still constitute sprawl at build out. Rural clustering and timing provisions for rural development as provided in the ACCP at the permitted density of 1 unit per 5 acres merely functions as an interim measure to limit development over the comprehensive plan’s planning horizon but is not a sufficient longer term planning form to address sprawl.

Sprawl is by definition “low-density development on the edges of cities and towns that is poorly planned, land-consumptive, automobile-dependent, designed without regard to its surroundings.” The State of Florida’s definition of urban sprawl is: a development pattern characterized by low density, automobile-dependent development with either a single use or multiple uses that are not functionally related, requiring the extension of public facilities and services in an inefficient manner, and failing to provide a clear separation between urban and rural uses. The EASP is the opposite of sprawl.

During Phase I of Envision Alachua, the Community Task Force identified a preference for compact development patterns (as opposed to the current zoning of one residential unit per five acres), making more lands available for economic development, large scale environmental conservation, agriculture, and timber to maximize the achievement of community goals and minimize water and energy use. The EASP’s compact development pattern makes more lands available for economic development while at the same time achieving large-scale environmental conservation and maintaining areas for agriculture and timber to maximize community goals and minimize water and energy use. Sprawl is what will most likely occur on the land over the next 50 years if this plan is not approved.

The EASP is a Sector Plan under 163.3245, F.S and provides for an innovative development pattern that is structured to provide and support future economic development in East Alachua County that:

RESPONSE (CONT.): CRITERION B.VIII.

- Creates 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 economy;
- Supports 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; and
- Promotes and encourages long-term planning for conservation, development, and agriculture on a landscape scale as identified within Chapter 163.3245, F.S.

The eighth criterion that the amendment “*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](#)*” has been met by the revised EASP amendment.