



# **Plum Creek Sector Plan/ Comprehensive Plan Amendment Application CPA-01-14 Workshop Staff Report**

*An analysis of the request by Plum Creek  
Land Company for a Comprehensive Plan  
amendment to create the Envision Alachua  
Sector Plan*

Public Workshops CPA-01-14  
September 2, 2014  
September 4, 2014  
September 16, 2014  
September 22, 2014

This is a report based on staff's analysis of the application submitted by Plum Creek Land Company for a comprehensive plan amendment to create the Envision Alachua Sector Plan. Four public workshops are scheduled to solicit public input and clarify issues. Upon completion of the workshops there may be additional information submitted or further analysis conducted and revisions to this report prior to the public hearings.

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## **Exhibits to Staff Report**

Exhibit 1 Information from Plum Creek Sector Plan Scoping Meeting of September 23,2013

Exhibit 2 Inventory Of Industrial, Commercial, and Office Lands

Exhibit 2 Proposed Development Program Policies for Employment Oriented Mixed Use Areas

Exhibit 4. List of Alachua County Comprehensive Plan Policies Referenced in the Natural Resource Analysis Section



## I. Summary of Staff Analysis

Staff has analyzed the Envision Alachua Sector Plan application including the supporting data and analysis and, based on the results of that analysis, is making a recommendation to the County Commission that it **deny** the proposed amendment. This recommendation is based on a review of the information and policies submitted by the applicant. This report was prepared for the County Commission public workshops on this application.

The application and accompanying backup material do not support the proposed density and intensity of land use that would be allowed by the proposed policies in the rural area that is the subject of this application. These urban land uses not compatible with the surrounding rural area and lifestyle. The proposed amendment also does not provide for the adequate protection of natural resources in an area of the County that has extensive and significant conservation areas protected under the County's adopted Comprehensive Plan. This rural area lacks urban infrastructure and the proximity to existing urban infrastructure that would make extension of urban public facilities and services viable and efficient. A key issue for local governments in planning for urban growth in an area is the identification and establishment of a capital improvement program identifying projects and policies needed to serve the public. These facilities include those needed for services such as potable water supply, wastewater treatment, transportation and public schools. The application for this amendment is lacking in this important component of comprehensive planning.

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

### **A. Sector Plans**

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

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

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

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

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

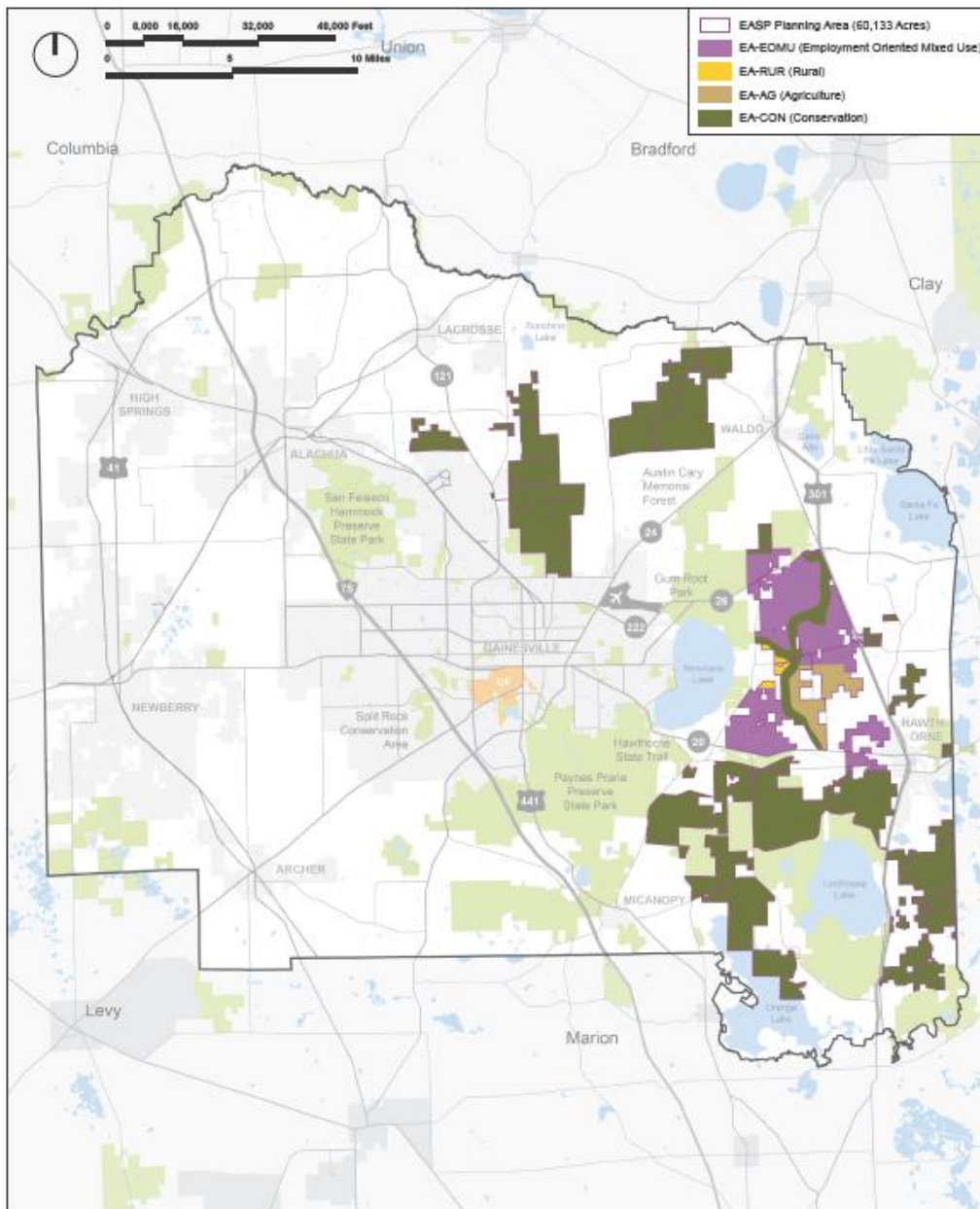
The first part of Section 163.3245(3) (a), F.S., which states “**In addition to the other requirements of this chapter**, a long-term master plan pursuant to this section must include maps, illustrations and text supported by data and analysis to address the following...” (emphasis added) is referring to the requirements for comprehensive plan amendments found in Chapter 163.3177, Florida Statutes, and Chapter 163, Part II, F.S., generally. The detailed

analysis of these requirements can be found later in the staff report in Section VII Statutory Requirements for Comprehensive Plans and Plan Amendments and Sector Plans.

State statutes allow for a jurisdiction to request that the Regional Planning Council hold a scoping meeting with the affected local government, surrounding jurisdictions that may be impacted, the Department of Economic Opportunity, the applicable Water Management Districts (St. Johns and Suwannee Water Management Districts in this case), the Department of Environmental Protection, the Department of State, the Department of Transportation, the Fish and Wildlife Conservation Commission and the Department of Agriculture and Consumer Services. Alachua County has adopted Sector Plan regulations into the Alachua County Unified Land Development Code in Chapter 402, Article 20 that require a scoping meeting for Sector Plan applications. This meeting was held on September 23, 2013. As a follow-up, the North Central Florida Regional Planning Council summarized the discussion at the scoping meeting and submitted this summary to the County and the Department of Economic Opportunity detailing their recommendations and comments from other agencies on issues that should be considered as part of this application (Exhibit 1).

## **B. Summary of Proposed Amendment**




The applicant, Plum Creek Land Company, has submitted this large-scale comprehensive plan amendment for approximately 60,136 acres in unincorporated Alachua County to create the Envision Alachua Sector Plan (EASP). The stated purpose of the amendment is a “request to amend the text and maps of the Alachua County Comprehensive Plan in order to provide significant conservation lands and agricultural lands in perpetuity, and provide opportunities for additional employment-oriented mixed use in eastern Alachua County on approximately 60,136 acres owned by Plum Creek.” (Page 1 of application, section titled “Reason for Request and Description of Request”) The amendment proposes new EASP Objective 10.1, which states “Provide a land use and development framework for the Envision Alachua Sector Plan through the creation of a Long Term Master Plan (LTMP) with a 50-year planning horizon that serves the public interest of the citizens of Alachua County by guiding conservation and development practices in a manner that ensures adequate protection of resources while strengthening the economic viability of the eastern portion of Alachua County.” For the 60,136 acres, this amendment proposes to change the designation on the County’s adopted Future Land Use Map 2030 from the Rural/Agriculture and Preservation future land use designations to several proposed new future land use categories that each have their own new policies. The overall mix of uses for the Envision Alachua Sector Plan is proposed to include a maximum of 10,500 residential units, 15.5 million square feet of non-residential development, and conservation and agriculture, including continued silviculture. The proposed future land use categories are shown on Map 1 and described below:



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

- EA-EOMU (Envision Alachua Employment Oriented Mixed Use). 
  - Approximately 11,393 acres
  - The majority of the potential 10,500 residential uses and all of the 15.5 million square feet of non-residential would be within the proposed EA-EOMU designated property.
  - Proposed uses are found in proposed EASP Policy 10.2.6., which states “the full range of employment based uses including wholesale, warehousing, storage and distribution, research and development, and industrial/manufacturing uses; the full range of residential uses; supporting commercial uses (office, retail, hotel,

and service uses); neighborhood-scale commercial uses; university campuses, schools, civic and public uses; recreation uses; agriculture uses; mining, excavation and fill operations; and conservation uses. The range of allowable uses shall be broadly interpreted so as to allow those types of uses compatible with uses listed herein and consistent with the overall intent of the applicable policies”.

- EA-CON (Envision Alachua Conservation) 
  - Approximately 46,101 acres total:
    - 22,885 acres already under conservation easements with a Preservation land use designation to be designated EA-CON
    - 23,216 acres proposed to be designated EA-CON that are currently Rural/Agriculture.
  - Proposed uses are found in proposed EASP Policy 10.2.5, which states that permitted uses would be silviculture, public and private conservation, recreation and open space use, public and private wildlife preserves, hunting areas, game management and refuge areas, mitigation areas, water conservation and retention/detention areas, and road crossings.
- EA-RUR(Envision Alachua Rural) 
  - Approximately 341 acres
  - Proposed uses are found in proposed EASP Policy 10.2.3, which states that proposed uses would be consistent with the County’s policies for the Rural/Agriculture land use category including one unit per five acres density. Proposed EASP Policy 10.6.1 would also allow continued or expanded mining operations by right prior to the Detailed Specific Area Plans being adopted. Mining is currently not occurring on site and new mining uses would require a special use permit approved by the County Commission in the Rural/Agriculture land use designation under current County policies but would be a permitted use under the proposed policies.
- EA-AG(Envision Alachua Agriculture) 
  - Approximately 2,321 acres
  - Proposed uses are found in proposed EASP Policy 10.2.4, which would allow the same permitted uses as those in the County’s Rural/Agriculture land use today including allowing uses by right



that currently require special County Commission approval such as mining, excavation and fill, research facilities, and industrial uses related to agriculture or agriculture products distribution. The density in this proposed land use is a maximum of one dwelling unit per 40 acres.

### **III. Land Use Analysis**

#### **A. Summary of Land Use Analysis**

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

The area of the County proposed for development is rural in nature with rural residences and farms on well and septic. The Rural Clusters of Windsor, Campville, Grove Park and Rochelle are adjacent to or close to the Envision Alachua Employment Oriented Mixed Use Area. Maintaining and preserving the character of these historic settlements and of this area of the County would be very difficult with the type of development proposed in the Envision Alachua Sector Plan. The Envision Alachua Sector Plan is not compatible with the rural character of this part of the County.

The applicant has submitted information indicating that there is a need for property designated for industrial use in Alachua County. Staff has analyzed the supply of undeveloped lands designated for industrial development in comprehensive plans of the County and cities in the County and found that there is a significant amount of such undeveloped industrial land. (see Exhibit 2 for detailed analysis.)

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

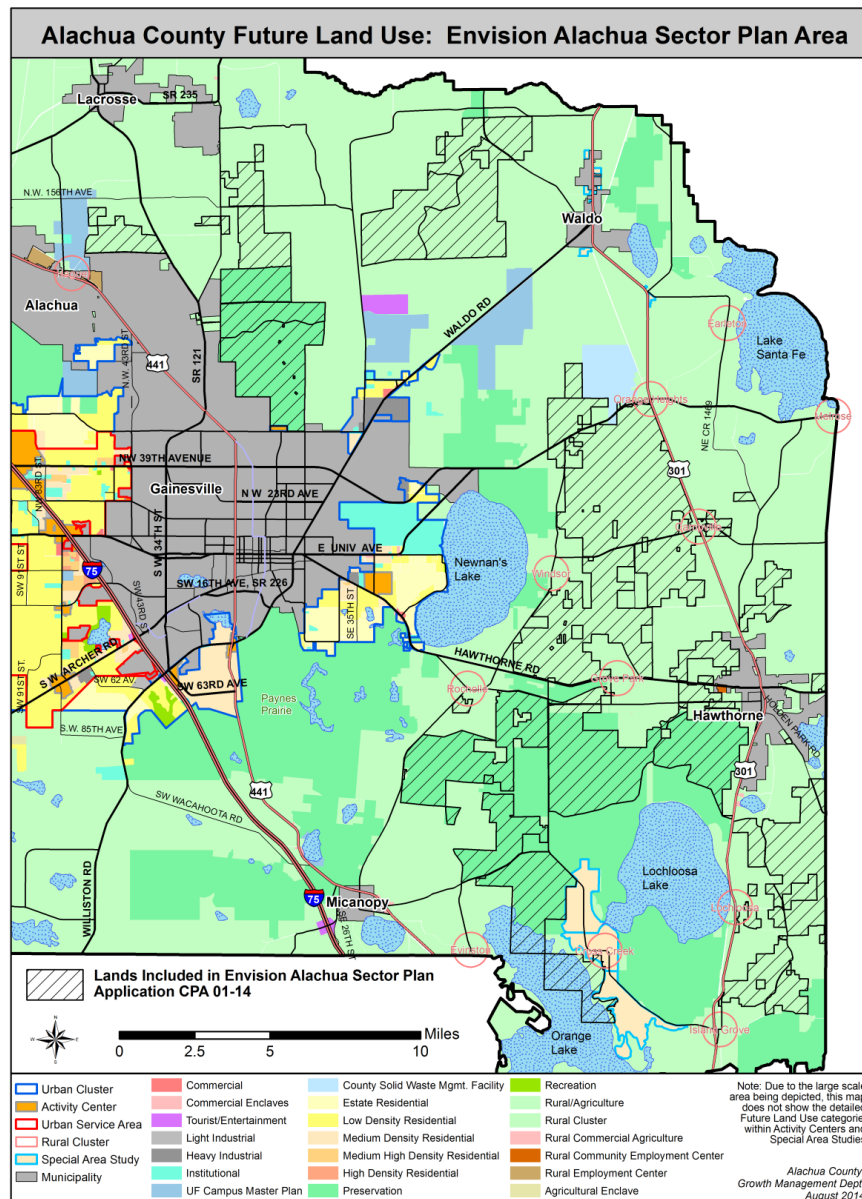
## **B. Analysis of Issues**

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

#### ***a. Existing Land Use***

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

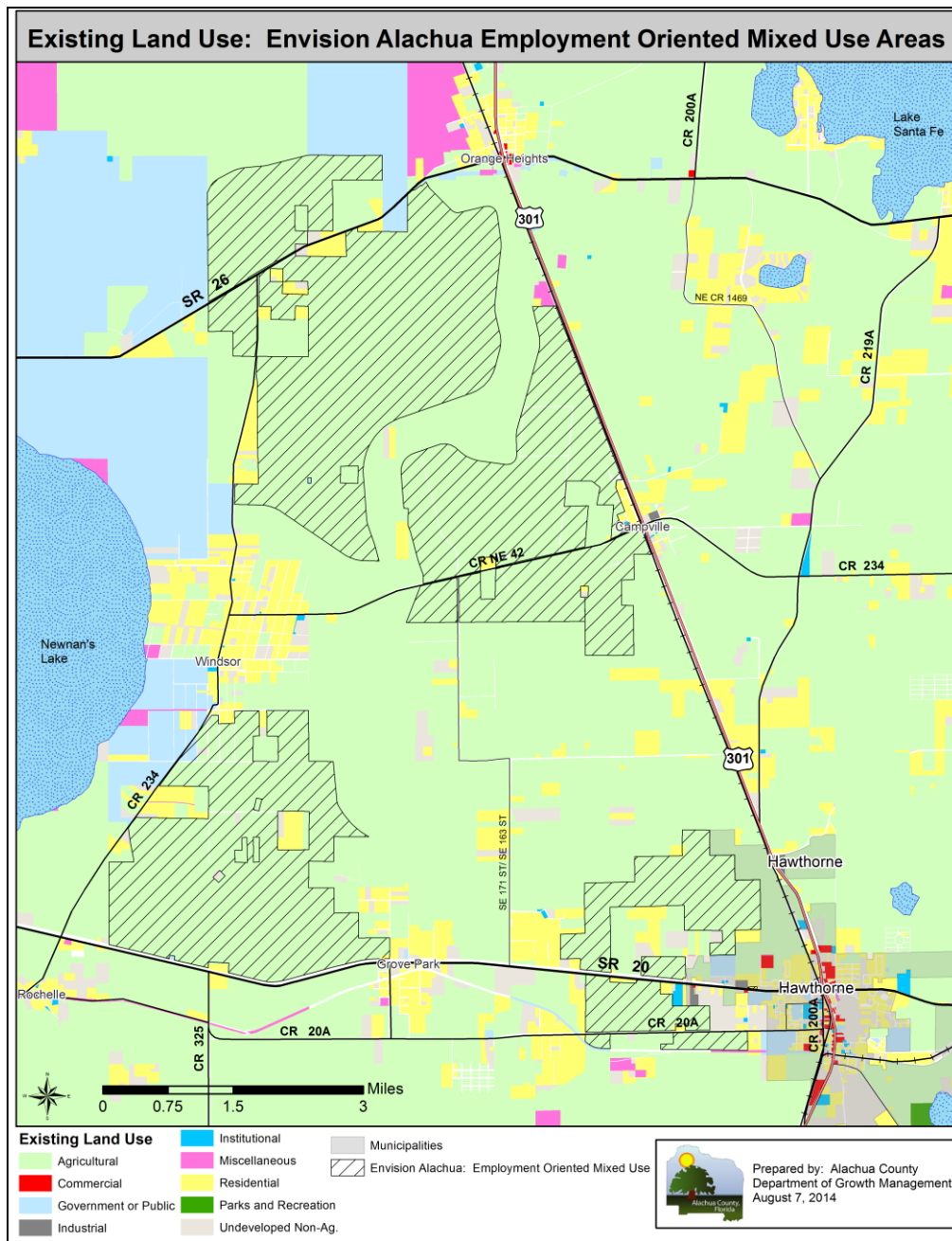
The application proposes a comprehensive plan amendment that contains four new land use designations as described in Section II Summary of Proposed Amendment (EA-EOMU, EA-CON, EA-RUR, EA-AG), a new general strategy, nine new objectives and approximately 110 new policies that would only apply to the land within the EASP boundaries. Excerpts of the proposed new strategies, objectives and policies are included in the staff review below. The full text of the proposed policies can be found in Section II.B of the application materials.



**MAP 2: FUTURE LAND USE MAP WITH EASP OVERLAY**

The four new proposed land use categories would apply only within the boundaries of the EASP. The area of the County where Plum Creek has proposed the EA-EOMU (Envision Alachua Employment Oriented Mixed Use) land use designation is primarily designated Rural/Agriculture on the Future Land Use Map 2030. Residential uses in the Rural/Agriculture land use areas are limited to a density of up to one dwelling unit per five acres. There are three Rural Clusters that are partly within the area proposed for mixed use, (EA-EOMU area): Windsor, Campville and Grove Park. These Rural Clusters have densities of up to one unit per acre within a small geographic boundary. These clusters are so designated to recognize and preserve historic rural settlements. The existing land uses within the EA-EOMU area bounded by US 301, State Road 20, County Road 234 and State Road 26 are agriculture and scattered rural residential development (see Map 3). The EASP areas contain significant areas of

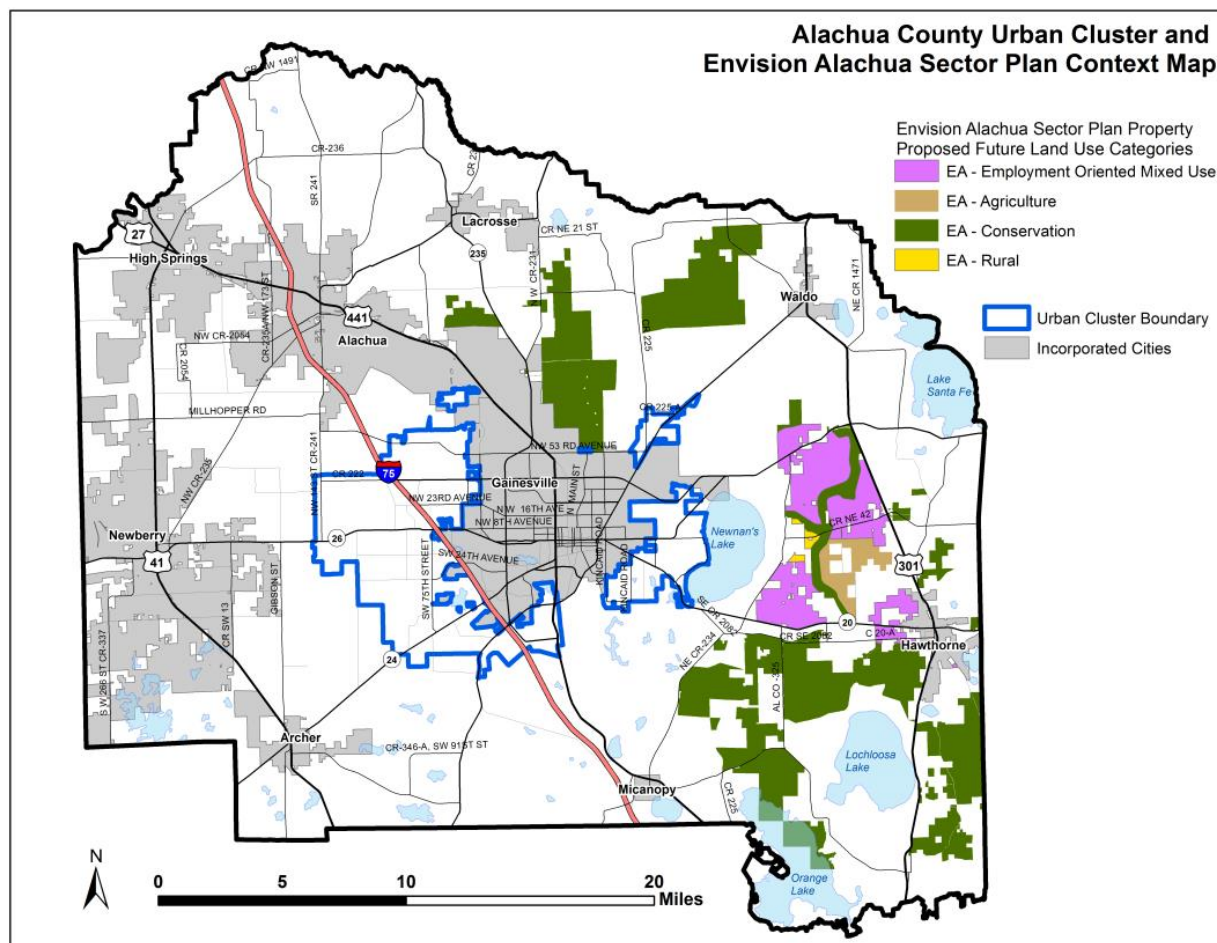
wetlands, floodplains, and poorly drained soils. Based on the information submitted by the applicant and County staff's evaluation, most of the land consists of an extensive mosaic of planted pine (approx. 67%) and wetlands (approx. 30%), with approximately half of the property located within 100-year floodplains. The majority of the subject area is identified and mapped in the Comprehensive Plan as Strategic Ecosystems because of its unique environmental quality and features. The environmental suitability of the property for the types of uses proposed is discussed in more detail in Section IV Natural Resources Analysis of this Report.



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

**b. Urban Cluster**

One of the fundamental land use strategies of the Alachua County Comprehensive Plan is to direct future urban development to locate within an urban growth area known as the Urban Cluster to maximize efficient use of land, separate urban and rural areas, and protect agricultural areas and natural resources. Defining a growth boundary is a central principle in land use planning in general. The Urban Cluster is designated on the Future Land Use Map and includes about 40,000 acres of unincorporated area generally surrounding and adjacent to the City of Gainesville, at the geographical center of the County. The proposed designation of the “Employment Oriented Mixed Use” area as part of the Envision Alachua Sector Plan would potentially establish new urban land uses consisting of 10,500 residential dwelling units and 15.5 million square feet of non-residential development on 11,393 acres located far outside of the Urban Cluster (see Map 4 below).



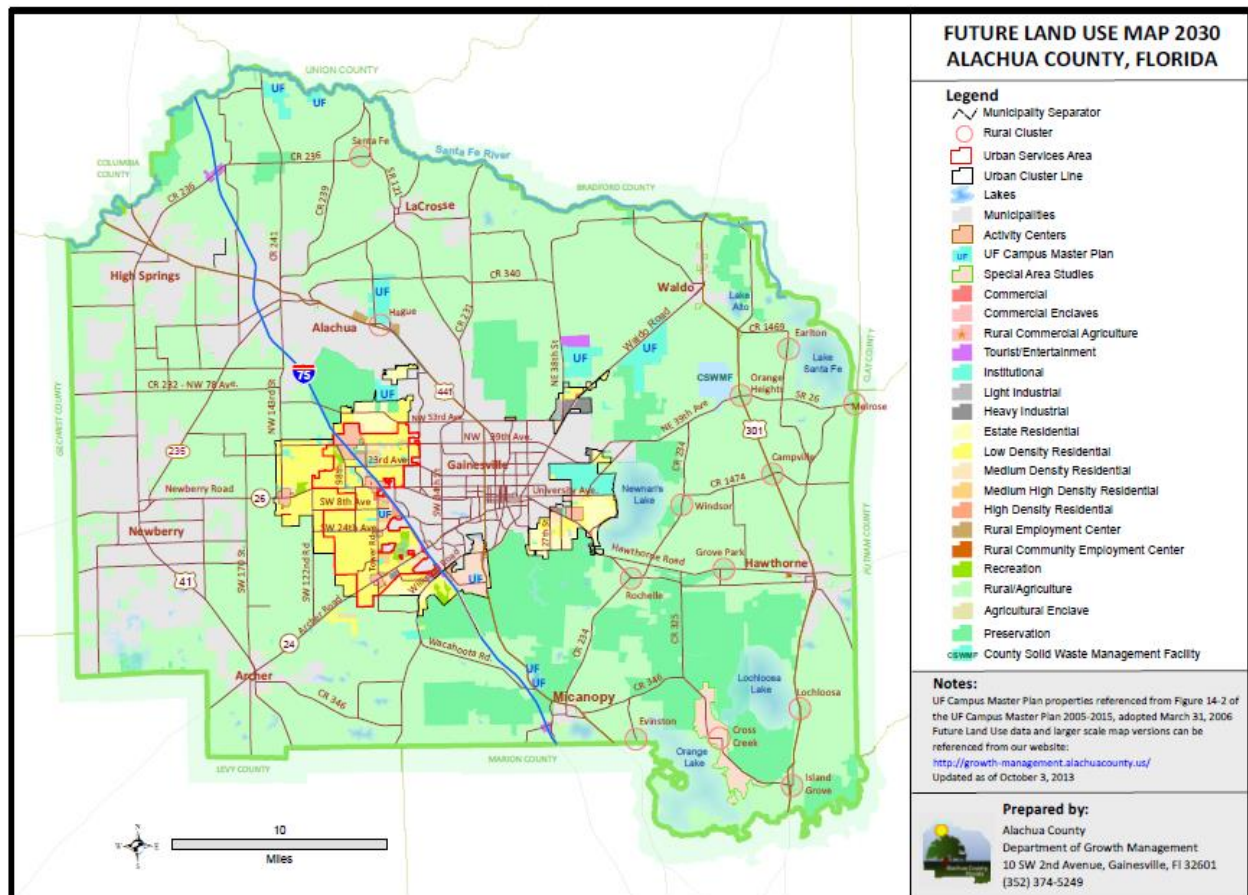
**MAP 3: URBAN CLUSTER AND ENVISION ALACHUA SECTOR PLAN CONTEXT MAP**

The establishment of the Urban Cluster boundary in the County's adopted Comprehensive Plan took into account a combination of factors, including the existing geographic extent of centralized water and sewer lines, the need to promote economic development in this area, the existence of a transportation network including public transit, and the presence of significant natural features such as karst topography to the west, and wetlands and conservation areas to the east and south, which limit the potential for new development. The following bullet points describe the basis for the Urban Cluster.

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



- New development is more cost effective in areas where the necessary public facilities and services to serve that development are already in place.



**MAP 4: ALACHUA COUNTY FUTURE LAND USE MAP 2030**

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

In addition, individual household energy consumption is greatly increased in developments outside of the urban area and even on the urban fringe. Numerous studies have found a reduction in energy consumption in urban, mixed use, multi-modal areas. One study, conducted by the U.S. Environmental Protection Agency, found that "individual households that shift from urban fringe to infill locations typically reduce Vehicle Miles Traveled (VMT) and emissions by



30-60%, and in typical U.S. cities, shifting 7-22% of residential and employment growth into existing urban areas could reduce total regional VMT, congestion and pollution emissions by 2-7%.” (Excerpted from *Evaluating the Fiscal Impacts of Development Part 1- Final Report and User’s Manual*, New Hampshire Office of Energy and Planning, June 2012)

The area proposed for development of the Envision Alachua Sector Plan is well outside of the Urban Cluster boundary as shown on Map 4. This rural area of the County is not appropriate for urban development and has no existing or planned urban infrastructure, public facilities or services. The proposed uses and intensities and densities of development for each of the five sub-areas in the Envision Alachua Employment Oriented Mixed Use area are urban uses that would require urban infrastructure, public facilities and service levels. In addition, a majority of the area proposed for the most dense and intense development is designated Strategic Ecosystem in the Comprehensive Plan because of its particular environmental sensitivity and uniqueness. The Comprehensive Plan contains a set of policies that proposed development within Strategic Ecosystems must follow. Below is a discussion of what could be developed today under the County’s policies for rural residential development and strategic ecosystems contrasted with what the proposed Envision Alachua Sector Plan policies would allow. In staff’s professional opinion, this area of the County is not suitable for the level of development that the proposed Envision Alachua Sector Plan would allow.

***c. Comparison of Potential Development Under the County’s Current Comprehensive Plan Policies***

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

## **Exercise: Potential Uses allowed under current code and policies and regulations vs. proposed uses**

Within the EASP, approximately 37,268 acres are available to develop at Rural/Agriculture land use densities based on a total application acreage of 60,133 acres, less 22,865 acres of lands with existing conservation easements (*i.e.*, with no development rights).<sup>1</sup> Of those 37,268 acres, approximately 32,667 acres are within designated strategic ecosystem and 4,601 acres are not.<sup>2</sup> Development potential is calculated slightly differently for the two areas.

### **Strategic Ecosystem:**

The maximum gross density allowed in Rural/Agriculture land use is one unit per five acres.<sup>3</sup> Therefore, the maximum development potential of the 32,667 strategic ecosystem acres is 6,533 units.<sup>4</sup> Approximately 9,646 acres of the 32,667 acres are wetlands and 23,021 acres are uplands.<sup>5</sup> For this exercise, it is assumed that within strategic ecosystems all wetlands are preserved along with one half of uplands.<sup>6</sup> As a result, approximately 21,157 acres of the 32,667 total strategic ecosystem acres would be preserved.<sup>7</sup> The remainder, approximately 11,510 upland acres, is available for development.<sup>8</sup> Further, assuming that the 11,510 acres would be developed according to clustering provisions under Future Land Use Element Policies 6.2.9 – 6.2.14,<sup>9</sup> an applicant would be entitled to a total of two units in addition to the number units based on the gross density, plus one additional unit per every 10 acres of conservation area set aside as open space.<sup>10</sup> Therefore, 8,650 units would be permitted on the 11,510 acres of developable land within strategic ecosystem.<sup>11</sup>

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<sup>1</sup> Acreages taken from application

<sup>2</sup> Acreages calculated by County staff

<sup>3</sup> Future Land Use Element Objective 6.2

<sup>4</sup>  $32,667 \text{ acres} \times 1 \text{ unit} / 5 \text{ acres} = 6533.4 = 6533 \text{ units}$  [Note: fractional units are rounded down]

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

<sup>6</sup> Conservation & Open Space Policies 4.7.4 and 4.10.5

<sup>7</sup>  $\text{Acres preserved} = \text{wetland acres} + \frac{1}{2} \text{ upland acres} = 9,646 \text{ wetland acres} + (\frac{1}{2})(23,021 \text{ upland acres}) = 9,646 + 11,510.5 = 21,156.5 = 21,157$

<sup>8</sup>  $\text{Acres available for development} = \text{total acres} - \text{acres preserved} = 32,667 - 21,157 = 11,510$

<sup>9</sup> Conservation & Open Space Element Policy 4.10.3

<sup>10</sup> Future Land Use Element Policy 6.2.10(d)

<sup>11</sup>  $\text{Total units} = \text{units allowed based on gross density} + 2 \text{ units} + \text{acres preserved} \times 1 \text{ unit} / 10 \text{ acres} = 6,533 + 2 + 21,157 \times 1/10 = 6,535 + 2,115.7 = 8,650.7 = 8,650$

### Non-Strategic Ecosystem:

Approximately 1,523 acres of the 4,601 acres of land estimated to not be within strategic ecosystem are below the safe upland line elevation of Orange Lake.<sup>12</sup> For the purpose of this exercise, these 1,523 acres are considered sovereign submerged lands with title held by the State and not by Plum Creek. As a result, no development rights are held by Plum Creek for these acres. The area potentially developable by Plum Creek, therefore, is calculated as the remaining 3,078 acres.<sup>13</sup> The maximum gross density allowed in Rural/Agriculture land use is one unit per five acres.<sup>14</sup> Therefore, the maximum development potential of the 3,078 non-strategic ecosystem acres is 615 units.<sup>15</sup> Rural / Agriculture cluster subdivisions are required to place a minimum of 50 percent of the total area in open space.<sup>16</sup> As a result, a minimum of 1,539 acres of the 3,078 total non-strategic ecosystem acres would be preserved (and an equal number developed).<sup>17</sup> The preserved area would include approximately 713 acres of wetlands,<sup>18</sup> an estimated 348 acres of required wetland buffers<sup>19</sup>, and an additional 478 acres of uplands.<sup>20</sup> A Rural Agriculture cluster subdivision on the 1,539 developable acres would be entitled to a total of two units in addition to the number units based on the gross density, plus one additional unit per every 10 acres of conservation area set aside as open space.<sup>21</sup> Therefore, 770 units might be permitted on the 1,539 acres of developable land within the non-strategic ecosystem area.<sup>22</sup>

Combined development for the two areas, under current county policies and regulations, without adjusting for other likely property or environmental constraints, would be approximately 9,420 residential units on 13,049 acres. No non-agricultural retail, commercial, or industrial uses would be allowed by right. A full analysis including engineering would be necessary to obtain the actual number of residential units that could be built on the property.

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<sup>12</sup> The 1,523 acres are based on a GIS shapefile feature supplied by Plum Creek. The 4,601 acres are based on calculations by County staff. The safe upland line elevation of Orange Lake (57.9' NAVD 88) is supplied by FDEP. In the absence of a formally determined ordinary high water line elevation for a water body, the safe upland line elevation is assumed, for regulatory purposes, as the boundary between sovereign and private lands.

<sup>13</sup> Acres available for development = total acres – acres of sovereign submerged lands = 4,601 – 1,523 = 3,078

<sup>14</sup> Future Land Use Element Objective 6.2

<sup>15</sup> 3,078 acres x 1 unit / 5 acres = 615.6 = 615 units [Note: fractional units are rounded down]

<sup>16</sup> Future Land Use Element Policy 6.2.12(a)

<sup>17</sup> Minimum acres preserved = total acres x ½ = 3,078 x ½ = 1,539

<sup>18</sup> Acreage calculated by County staff based on SJRWMD 2009 and SRWMD 2010 land use/land cover files, as appropriate.

<sup>19</sup> For purposes of this estimate, staff used a standard 75-foot buffer on all wetlands.

<sup>20</sup> For the purpose of the exercise, it is assumed that the additional 478 acres are a conservation resource (e.g., 100-year floodplain).

<sup>21</sup> Future Land Use Element Policy 6.2.10(d)

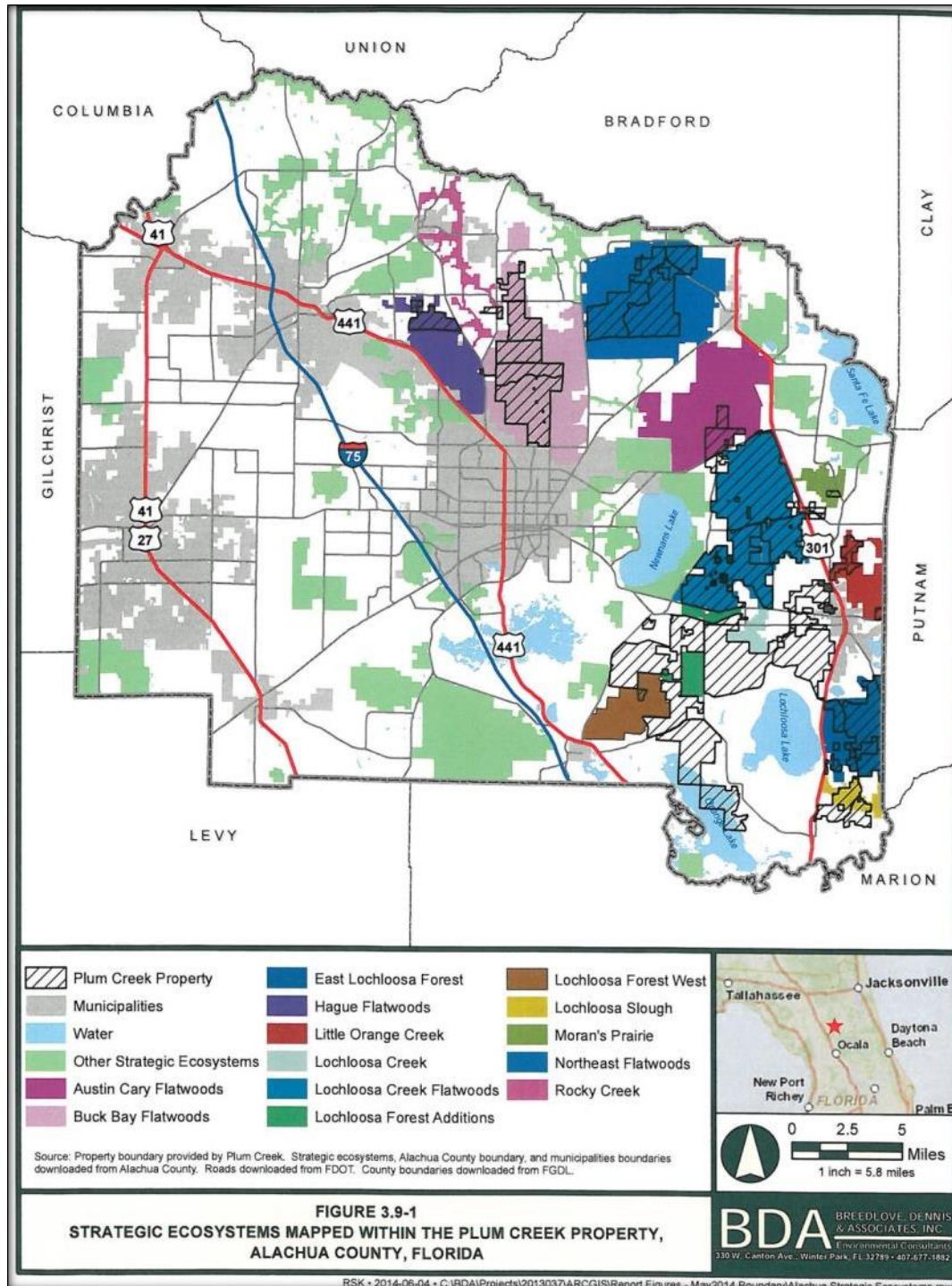
<sup>22</sup> Total units = units allowed based on gross density + 2 units + acres preserved x 1 unit / 10 acres = 615 + 2 + 1,539 x 1/10 = 617 + 153.9 = 770.9 = 770

Comprehensive Plan Policy 3.6.7 states “Development shall not be allowed at the maximum densities and intensities of the underlying zoning district, if those densities would be harmful to the natural resources.” The natural resources located throughout this Envision Alachua Sector Plan property create a fragmented property with limited access and these issues would be taken into account when reviewing development proposals. In addition, right-of-way and other subdivision requirements that must be met to develop this fragmented property would likely result in far fewer than 9,420 residential units being able to be developed and would create a situation in which development is not cost effective or feasible.

Contrast this development potential with the development potential possible in application, which is proposing 10,500 units and 15.5 million square feet of non-residential on 11,390 acres with additional 337 acres of EA-RUR (similar to existing Rural/Agriculture land use with maximum one unit per 5 acre residential densities) and 2,321 acres of EA-AG (allowing Ag with 1 per 40 acre residential unit densities). Numbers are shown in table below:

<b>Development Sub-Areas</b>	<b>Total Acreage</b>	<b>Residential</b>	<b>Non-Residential sq. ft.</b>
EA-EOMU	11,390	10,500 max	15.5 million
EA-RUR	337	67	0
EA-AG	2,321	58	0
<b>TOTAL</b>	<b>14,048</b>	<b>10,500 max</b>	<b>15.5 million</b>

So without getting into specific design standards and site locations, the applicant proposes 10,500 residential units and 15.5 million square feet. of non-residential uses on a total of 14,048 acres, while current policies and regulations would potentially allow up to a maximum of 9,420 units and zero non-residential on 13,049 acres. Based on this simplified number crunching, the applicant has proffered no significant difference in the amount of conservation set asides outside of their proposed development areas than what could currently be required under existing code requirements, but has requested an additional 1,000+ residential units and 15.5 million square feet. of non-residential with weaker wetland and floodplain protection standards.

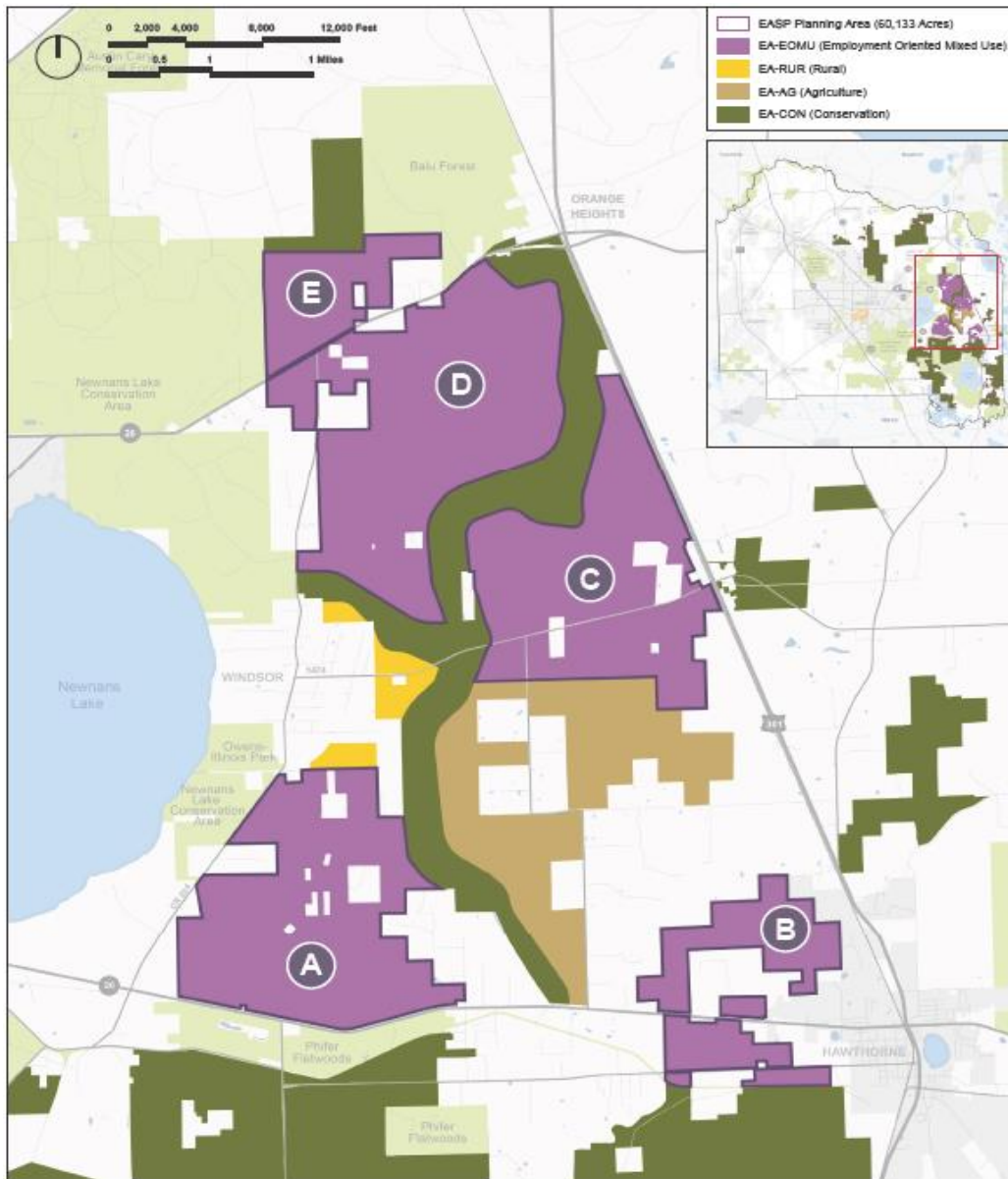


**MAP 5: STRATEGIC ECOSYSTEMS MAPPED WITHIN THE PLUM CREEK PROPERTY, ALACHUA COUNTY, FLORIDA, (TAKEN FROM APPLICANT'S SUBMITTED ENVIRONMENTAL DATA AND ANALYSIS, JUNE 2014)**

## **2. Proposed Development Program**

The Envision Alachua Employment Oriented Mixed Use (EA-EOMU) land use designation proposes a mix of manufacturing, commercial and residential uses in five areas within the boundaries of the proposed EA-EOMU designated property (see Map 7). The permitted uses within the proposed EA-EOMU land use designation would be “the full range of employment based uses including wholesale, warehousing, storage and distribution, research and development, and industrial/manufacturing uses; the full range of residential uses including accessory dwelling units; supporting commercial uses (office, retail, hotel, and service uses); neighborhood-scale commercial uses; university campuses, schools, civic and public uses; recreation uses; agriculture uses; mining, excavation and fill operations; and conservation uses. The range of allowable uses shall be broadly interpreted so as to allow those types of uses compatible with uses listed herein and consistent with the overall intent of the applicable policies”. (Proposed EASP Policy 10.2.6).

The following proposed program policies prescribe a Maximum Development Program Baseline, Permitted Uses/Density/Intensity and Mix of Uses for the five distinct Areas (A, B, C, D and E). As a note to proposed EASP Policies 10.3.1.1 (Area A), 10.3.2.1(Area B), 10.3.3.1(Area C), 10.3.4.1 (Area D) and 10.3.5.1(Area E) the application states “The maximum development program described for each EA-EOMU Area is not cumulative and shall be limited by the overall EASP development program as established by Policy 10.1.4”. Proposed EASP Policy 10.1.4 lists the maximum development program as 10,500 residential units and 15.5 million square feet of non-residential. These proposed policies list minimum and maximum residential densities, minimum and maximum floor area ratios and minimum and maximum acreage percentages for each use. The ranges for each use are quite large and staff has provided an analysis of the potential ranges in manufacturing use for Area B as an example. The program policies for each specific area can be found in Exhibit 3. The program policies for Area B are below with the analysis.



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

#### **Proposed EASP Policy 10.3.2.1 Area B Development Program**

The standards for measuring the maximum development program permitted within Area B shall be based upon the following:

##### **a. Maximum Development Program Baseline\***

Residential: 1,500 dwelling units\*\*

Non-residential\*\*\*:

Research & Development / Office 1.0 million square feet

Advanced Manufacturing 3.6 million square feet

Commercial 400,000 square feet

\* The maximum development program described for each EA-EOMU Area is not cumulative and shall be limited by the overall EASP development program as established in Policy 10.1.4.

\*\* Accessory dwelling units may be provided; however, such units shall be in addition to the maximum residential units noted above.

\*\*\* Facilities to serve the community including, but not limited to, schools, places of worship, government services, recreation, utilities, and civic facilities, shall be provided as needed. Floor area for such facilities shall be in addition to the maximum nonresidential square footage noted above.

#### **Proposed EASP Policy 10.3.2.2 Area B Permitted Uses/Density/Intensity**

Lands designated within Area B shall be permitted the full range of uses as described in Policy 10.2.6 with the densities and intensities as described below. R&D/Office and Advanced Manufacturing uses are not permitted south of SR 20.

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



### **Proposed EASP Policy 10.3.2.3 Area B Mix of Uses**

Area B 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 Area B Total Acres)</u>		
	<u>34%</u>	<u>(1)</u>
<u>Buildable Area</u> <u>(Percentage of Area B Acres Net of Open Space)</u>		
<u>Commercial</u>	<u>0%</u>	<u>20%</u>
<u>R&amp;D / Office</u>	<u>0%</u>	<u>15%</u>
<u>Manufacturing</u>	<u>40%</u>	<u>63%</u>
<u>Residential</u>	<u>25%</u>	<u>40%</u>
<u>Recreation (2)</u>	<u>5%</u>	<u>---</u>
<u>Civic</u>	<u>7%</u>	<u>---</u>

(1) An applicant may provide additional open space above and beyond the minimum open space requirement as a part of the DSAP process, however, the minimum open space standard reflects the requirement of the comprehensive plan with regard the amount of open space that shall be provided within Area B.

(2) Active Recreation uses are permitted to occur within the 100 year Floodplain. These recreational lands are supplemental to the passive recreation uses provided within the EASP Conservation Land Use.

### Staff Analysis of Area B Example:

Using the numbers in the tables above for manufacturing, the following ranges could be allowed within Area B.

	Area B Net Acreage*	Acres Designated for Manufacturing Uses**	Acres Converted to Square Feet	Potential Manufacturing Floor Area Using 0.15 FAR ***	Potential Manufacturing Floor Area Using 2.0 FAR ***
Manufacturing Uses on 40% of Net Acreage**	847	339	14,766,840 sf	2,215,026 sf	29,533,680 sf
Manufacturing Uses on 63% of Net Acreage**	847	534	23,261,040 sf	3,489,156 sf	46,522,080 sf

**TABLE 1: RANGE OF ALLOWABLE MANUFACTURING DEVELOPMENT WITHIN AREA B**

\* The total acreage of Area B as indicated in the application materials is 1,284. The net acreage is calculated by subtracting the minimum open space amount of 34% per proposed Policy 10.3.2.3 from the total acreage of Area B to arrive at a net acreage of 847.

\*\* Proposed Policy 10.3.2.3 provides a land use mix for Area B which indicates a minimum of 40% and a maximum of 63% of the total acreage of Area B would be designated for manufacturing uses.

\*\*\* Proposed Policy 10.3.2.2 provides a range of intensity for “advanced manufacturing” based on a floor area ratio (FAR) range from 0.15 up to 2.00.

Note: The total amount of manufacturing development in Area B is limited by the total development program of 15.5 million square feet of non-residential per Policy 10.1.4.a

The calculations above conclude that for Area B the manufacturing square feet could range from a low of 2,215,026 square feet to a high of 15.5 million square feet as limited by the maximum development program. Understanding the amount of the overall total development program that can go into each sub-area of the EA-EOMU is important in order to be able to assess the impacts of the development on natural resources, surrounding properties, transportation and other public facilities and services. Though some flexibility in development is needed and is appropriate, this extreme range of potential development in just this one example demonstrates that an accurate assessment of the total impacts of this development is not feasible.

In addition to the wide ranges of development potential that could be permitted, there are no proposed policies that dictate phasing within each sub-area. This means that a single use could be built first in a DSAP with no assurance when or if other uses would follow. The proposed policies are written broadly to require the mix of uses though the actual existence of a mix of uses assumes that each DSAP would be built-out entirely, which is not guaranteed.

### **Proposed EASP Policy 10.6.1 Permitted Uses Without a Detailed Specific Area Plan (DSAP)**

states “The following uses do not require the processing of a DSAP, and shall be allowed within the Planning Area prior to the adoption of a DSAP that changes the Permitted Uses within the DSAP area.” This list of proposed uses includes new, continued and expanded agriculture and silviculture uses; new, continued, and expanded farm manager and farmworker housing; and natural resource based operations, including continued and expanded mining operations and water quality improvement projects. This proposed EASP policy implies that the permitted uses within the EASP are not changed until the DSAP is processed. The long-term master plan is a comprehensive plan amendment that proposes to designate property with new Envision Alachua land uses, which would change the allowed uses at the time of the adoption of the Comprehensive Plan amendment not at some future zoning stage. The uses mentioned above would also be allowed uses within the proposed EA-EOMU areas. Section 163.3245(9), F.S. states “The adoption of a long-term master plan or a detailed specific area plan pursuant to this section does not limit the right to continue existing agricultural or silvicultural uses or other natural resource-based operations or to establish similar new uses that are consistent with the **plans** approved pursuant to this section.”[emphasis added]. Plans would include the Long-term Master Plan comprehensive plan amendment, not only the Detailed Specific Area Plan. The language proposed by the applicant above (proposed EASP Policy 10.6.1) would allow those agricultural and natural resources uses upon comprehensive plan amendment adoption. The language also proposes allowing continued and expanded mining operations which currently require a special use permit from the County Commission. The County staff is not aware of any current mining taking place on these properties. There are no special use permits issued to Plum Creek for this use and no resource-based industrial land use overlays on this property.

In the data and analysis section submitted as part of the application titled Land Use Data & Analysis: Addendum Appendix 2: EA-EOMU Land Use Suitability Scenarios, possible development scenarios for each of the five areas are given. Each of these scenarios, and others, could be built based on the proposed policies and they range in impact to wetlands and wetland buffers. Potential impacts to floodplains are not calculated. The scenarios are just examples in the backup material. If the amendment is adopted, they would not be mandated in policy and therefore the actual mix of uses or potential impacts to wetlands and other natural resources could be much different than the examples given in these scenarios.

### **3. Compatibility with Surrounding Areas**

The subject area of the County is rural in nature with rural residences on well and septic and farms within the boundaries of the proposed Envision Alachua-Employment Oriented Mixed Use area. Rural homesites and farms on lots generally three acres and larger also are scattered throughout the eastern part of the County. The rural character of this part of the County extends into the neighboring counties of Putnam, Marion and Clay Counties as well. The Rural

Clusters of Windsor, Campville, Grove Park and Rochelle are also either adjacent to or in close enough proximity to be substantially affected by urban development of this intensity and density. Maintaining and preserving the rural character of these historic settlements and of this area of the County would be very difficult with the type of development proposed in the Envision Alachua Sector Plan. The Envision Alachua Sector Plan is not compatible with the rural character of this part of the County.

#### **4. Internal Consistency with the Comprehensive Plan**

##### *(a) Overview of the Comprehensive Plan*

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

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

The Comprehensive Plan Principles and General Strategies are:

Goal

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

Principles:

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

General Strategies to implement the Guiding Principles:

**GENERAL STRATEGY 1**

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

- Designate and maintain on the Future Land Use Map an urban cluster that sets a boundary for urban growth.
- Provide incentives for higher average densities for residential development and mixed uses in the urban cluster, including density bonuses and transfer of development rights.
- Provide a range of urban residential densities with the highest densities located in or near urban activity centers, and lower densities located in outlying rural areas or areas of the County that have physical limitations to development.
- Utilize mechanisms such as land acquisition, conservation easements, variable lot sizes and conservation subdivisions.
- Preserve ecosystems of a given area and incorporate hazard-resilient land planning.
- Time development approval in conjunction with the economic and efficient

provision of supporting community facilities, urban services, and infrastructure, such as streets, utilities, police and fire protection service, emergency medical service, mass transit, public schools, recreation and open space, in coordination with policies in the Capital Improvements Element.

## **GENERAL STRATEGY 2**

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

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

## **GENERAL STRATEGY 3**

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

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

The Envision Alachua Sector Plan proposes a new general strategy to be included with the principles and general strategies already in the Comprehensive Plan.

#### **Proposed EASP General Strategy 4:**

##### **GENERAL STRATEGY 4**

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

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

Seven of the eight bullet items in this new proposed strategy statement are in the form of action statements about policies and processes, *i.e.*, (1) “**create** economic progress opportunities to support and enhance the innovation economy, provide job opportunities....,” (2) “**protect and retain** regionally significant lands,” (3) “**support** the development of communities that have a balanced and compatible mix of land uses...while conserving lands to protect ecosystems....,” (4) “**address** long term needs for water supply....,” (5) “**attract** development that supports a sustainable economic future for residents at all wage and skill levels....,” (6) “**maintain** agriculture and silviculture as viable and sustainable economic

activities;” (7) “**develop** partnerships for planning and delivering required infrastructure with utility providers” (*note numbers in parentheses have been added for reference*). The eighth bullet, *i.e.* “Are of sufficient size and land use composition to support a variety of employment opportunities and social activities”, is unlike the other bulleted items and not in the form of an action statement about policies and processes, and consequently it is unclear as a general guide for specific policies and processes.

Much of this proposed new “general strategy” and the seven bullet action items listed are about subject matter that is already addressed in the County’s Comprehensive Plan in the principles or strategies adopted in the Plan and in the particular goals, objectives and policies that are within the elements of the Plan. As such, the proposed strategy appears to be redundant and unnecessary. If it is intended as a strategy just for the proposed new EASP Objective 10.1 and the related policies proposed to be added to the Future Land Use Element and the proposed new EASP Objective 1.2 and related policies proposed to be added to Transportation Mobility Element, the location of an additional strategy statement such as this in the section of the County’s Plan stating overall Goals, Principles and General Strategies is misplaced since this section applies to the County’s Comprehensive Plan as a whole.

Proposed EASP Policy 10.1 states that “The Envision Alachua Sector Plan is consistent with the Future Land Use Element planning principles adopted by Alachua County which function to guide the County’s future land use policy” and then there are a series of four proposed EASP sub-policies (10.1.1.1 through 10.1.1.4) describing how the EASP “supports” these principles.

Comprehensive plans and plan amendments must be internally consistent. As discussed above, the Principles adopted in the County Plan are linked with General Strategies to implement those principles, which in turn are translated into more specific Goals, Objectives and Policies and adopted future condition maps focusing on land use, public facilities and services, and protection of natural resources in the various elements of the Plan. All of these parts of the Comprehensive Plan are inter-related and consistent with each other, as required by the Community Planning Act in Florida Statutes and the County’s Comprehensive Plan:

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



**Future Land Use Element Policy 7.1.23:**

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

Therefore, assessment of the consistency of the proposed EASP amendments is a question of their consistency with the Plan as a whole, not just consistency with a single general principle or principles. The items discussed in proposed EASP Policies 10.1.1.1 through 10.1.1.4 must be consistent with the principles in the adopted Plan and with the strategies to implement those principles and the more specific goals, objectives and policies to guide future decision-making about where uses of certain intensities and densities are to be located, including how natural resources are to be protected, how necessary infrastructure services are to be provided, and how cohesive communities with a full range of mixed uses are to be achieved through “meaningful and predictable standards for ...development of land” (s.163.3177((2), F.S.). These types of issues and how the new maps, objectives and policies proposed by this amendment to the County’s Plan relate to the adopted Plan as a whole, as well as whether the amendment is supported by appropriate and relevant data and analysis, are the focus of most of the balance of this staff report.

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

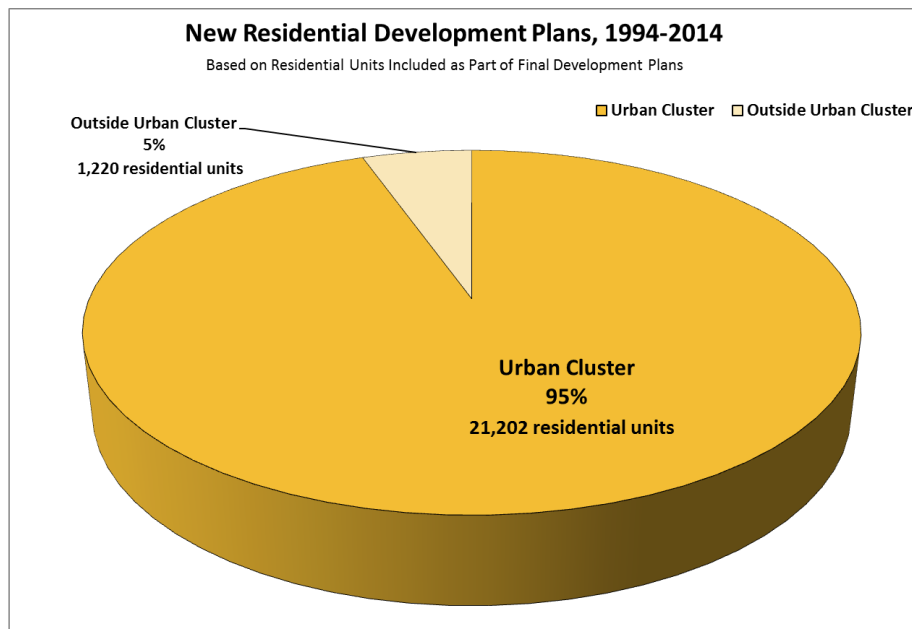
*(b)* Urban Cluster Capacity

The capacity of the Urban Cluster is evaluated as part of the periodic update of the Comprehensive Plan, to determine a sufficient and non-excessive amount of land within the Urban Cluster to accommodate urban land uses for a ten-year and twenty-year time frame. This evaluation compares the forecasted need for land for urban residential and non-residential development based on projected populations, average household size, residential vacancy rate, and market factors. By using no longer than a twenty-year time horizon, there is some reliability of the population projections. An Evaluation and Appraisal Report is completed every seven years, which translates into a major Comprehensive Plan amendment. Between the EARs there are opportunities for other revisions, including privately-initiated comprehensive plan amendments. The most recent analysis of the Urban Cluster capacity was completed as part of the [Evaluation and Appraisal Report \(EAR\) on the Comprehensive Plan adopted in 2009](#). This analysis indicated that there was sufficient land available in the Urban Cluster to accommodate the projected unincorporated population growth through the Year 2035.

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

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

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



**FIGURE 1: NEW RESIDENTIAL DEVELOPMENT PLANS, 1994 – 2014**

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

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

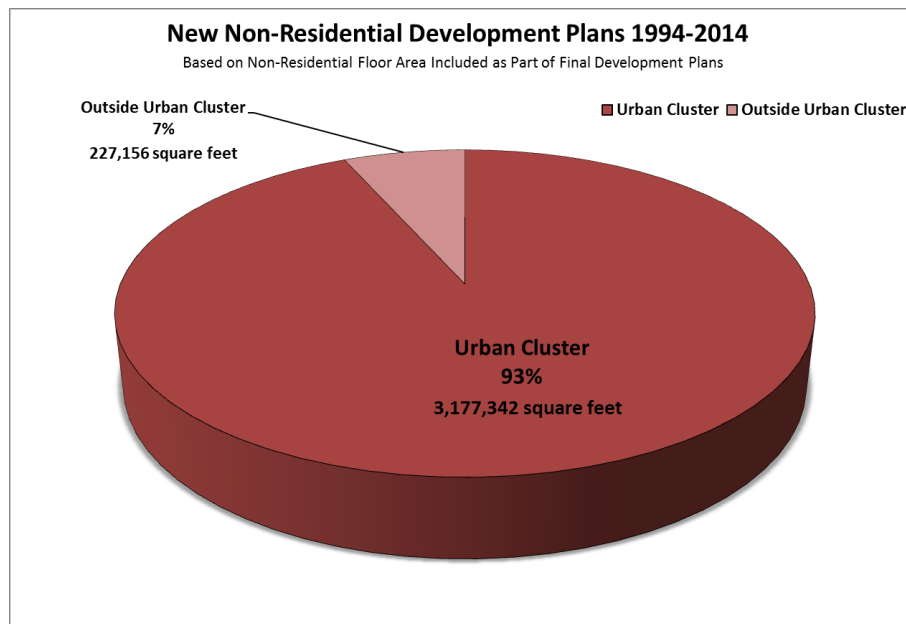
Year	Urban	Rural
2014	148	34
2013	263	56
2012	175	42
2011	129	26
2010	162	48
2009	188	49
2008	186	72
2007	348	135
2006	495	207
2005	710	289
2004	620	275

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

Table 2 shows higher numbers of both urban and rural single family permits from 2004 to 2006/2007. This time period coincides with the strong uptick in housing starts prior to the housing bubble bursting in the 2007 time period. Long-term population trends suggest a moderate rate of growth for new single family in the future. National and local trends are seeing a shift of population into the urban areas and into multifamily units. There is very little

demand for rural development as evidenced in these trends and as seen locally as shown on Table 2.

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



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

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

#### *(c) Analysis of Urban Cluster Expansion*

Policies throughout the Comprehensive Plan help define how those land use designations are to be developed and help define the Urban Cluster boundary. Future Land Use Element Policy 7.1.3 must be analyzed for any proposed amendments to the Urban Cluster or amendments that would place urban land uses outside of the Urban Cluster as would the proposed Envision Alachua Sector Plan.

Section 163.3177(1)(f)3, F.S., states that “The Comprehensive Plan shall be based upon permanent and seasonal population estimates and projections, which shall either be those published by the Office of Economic and Demographic Research or generated by the local government based upon a professionally acceptable methodology. The plan must be based on at least the minimum amount of land required to accommodate the medium projections as

published by the Office of Economic and Demographic Research for at least a 10-year planning period...” Future Land Use Element Policies 7.1.3 a – c provide a policy-based analytical framework for determining whether or not the County’s Comprehensive Plan contains a sufficient and non-excessive amount of land within the Urban Cluster to accommodate urban uses based on the population projections.

While it is a normal and customary part of planning to base land use designations on the need for a certain amount of available land within land use categories, Florida Statutes Section 163.3245 (3) (a) 7 states that “A long-term master plan [for a Sector Plan] adopted pursuant to this section is not required to demonstrate need based upon projected population growth or on any other basis.” Though the applicant is not required to demonstrate need based on this section of state statute, they have chosen to do so. Data and analysis was submitted that attempts to demonstrate a lack of sufficient industrial land uses within the Urban Cluster and a need for the industrial employment-oriented land uses on the subject property. Future Land Use Element Policies 7.1.3 a-c are policies that should be analyzed to determine whether there is a need to expand the Urban Cluster. Since the applicant has chosen to use need for industrial land use designations as a basis for this application, staff has analyzed that need, which is summarized below.

Future Land Use Element Policy 7.1.3 d is a locational policy that must be analyzed if the analysis of a- c has determined there is a need to expand the Urban Cluster.

#### *Future Land Use Element Policy 7.1.3*

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

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

The Comprehensive Plan amendment application for the Envision Alachua Sector Plan proposes policies that could potentially allow up to 15.5 million square feet of non-residential development, including a range of employment-based industrial land uses, within the designated Employment Oriented Mixed Use areas. The report provided by the applicant titled, "Industrial Lands Needs Analysis," dated February 17, 2014 and prepared by CHW, Inc., indicates that there is a deficiency of industrial-designated land within Alachua County, and that additional lands for employment-based land uses are needed. Though it is a bit unclear, the applicant apparently used for-sale industrial property as the basis for their analysis. Whether or not the property was currently for sale was not a factor in the County's analysis. The properties that are offered for sale or lease change constantly. Therefore, currently available inventory is not an appropriate basis to analyze a plan with a 50-year time horizon.

County staff has compiled the information found in Exhibit 2 on the quantity of industrial-designated lands in Alachua County. The information prepared by County staff indicates that there is a significant quantity of undeveloped land that is currently designated for industrial uses in the County, and that these lands are strategically located proximate to existing economic and physical infrastructure such as Gainesville Regional Airport, Interstate-75, railroad lines, communication networks, local road networks, and centralized potable water and sanitary sewer systems.

There are approximately 9,597 acres of industrial-designated lands countywide and, of that total, approximately 4,553 acres are presently undeveloped. The largest concentrations of industrial-designated lands are within the cities of Gainesville (3,240 acres designated and 1,380 acres undeveloped) and Alachua (2,759 acres designated and 1,463 acres undeveloped), and within the unincorporated area (1,907 acres designated and 962 acres undeveloped). The City of Hawthorne has 448 acres designated on its Future Land Use Map for industrial uses, and 368 acres of that is presently undeveloped. If these undeveloped, industrial-designated lands were to be developed with new industrial uses in the future, it would potentially generate a significant number of new jobs within Alachua County. Using the jobs multiplier used in the applicant's data and analysis to estimate employment generation for "advanced manufacturing" uses, a jobs multiplier of 1.2 jobs per 1,000 square feet, the potential for job creation is 23,799 on lands currently designated for industrial uses.

#### *Future Land Use Element Policy 7.1.3*

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

- (1) *revisions to density standards and land development regulations, or other measures, to accommodate greater population within the existing Urban Cluster*
- (2) *coordination with municipalities regarding possible reallocation of forecast need to the incorporated areas*
- (3) *phased expansion of the Urban Cluster*
- (c) *If the forecast need for one type of land use exceeds the supply of land for that particular use, a revision to the allocation of land uses within the Urban Cluster shall be considered before the Urban Cluster is expanded.*

The County's analysis in Exhibit 2, and the analysis completed as part of the latest Comprehensive Plan update in 2011, did not find that any of the land uses designated within the Urban Cluster were less than the forecast need for that land use. The applicant has failed to demonstrate a need for additional industrial land use designation within the County. It is unclear exactly how the applicant calculated industrial land acreages but even if it were calculated but if it were determined that need existed for industrial land, then, as required by Future Land Use Element Policy 7.1.3 (c) above, *a revision to the allocation of land uses within the Urban Cluster shall be considered before the Urban Cluster is expanded*. The applicant has not demonstrated that this reallocation of land within the Urban Cluster has been considered.

Though the County's review of the data and analysis submitted with the application and the County's own calculations of industrial land use availability shows an ample supply of industrially designated vacant property in the County, staff analyzed the locational policies found in Future Land Use Element Policy 7.1.3 (d) that are normally only considered once a need to expand the urban cluster has been determined. That analysis follows:

*Future Land Use Element Policy 7.1.3*

- (d) *If this methodology determines expansion of the Urban Cluster is warranted, the evaluation of appropriate location shall be subject to analysis including the following economic, infrastructure, transportation, and conservation and recreation criteria:*
  - (1) *rural character and viable agriculture land and the potential impact of expansion of the Urban Cluster on existing agricultural uses*

The Comprehensive Plan designates the unincorporated areas outside the Urban Cluster (rural areas) as a combination of agriculture, rural residential uses and large-scale preservation of environmentally-sensitive areas. Areas outside the Urban Cluster are not designated for future urban development or related public investment in urban infrastructure and services. Most of

the unincorporated rural area is designated as 'Rural/Agriculture' under the Comprehensive Plan. The Rural/Agriculture policies promote the continuance of viable agriculture in Alachua County, protection of rural character, and the preservation of open space and environmentally sensitive lands.

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

Most of the land used for agriculture within the proposed EA-EOMU designation is Plum Creek's timberland. Timber is considered an agricultural pursuit and is compatible with the rural character of the area. A multi-use development with 10,500 homes and 15.5 million square feet of non-residential would be a suburban or urban pattern of development and would not be compatible with the surrounding rural areas.

#### *Future Land Use Element Policy 7.1.3*

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

...

(2) *economic development considerations including affordable housing*

A major emphasis of the proposed policies and background material is economic development. An applicant submitted report titled *Plum Creek, UF and Economic Growth in the Gainesville Region* by Jim Dewey, Dave Denslow and Ray Schaud provides data and analysis which the applicant purports supports the philosophy that, if Plum Creek develops this property, "which



would provide 30,000 jobs above the current growth trend over 50 years”, “there is no reason based on the available data to think that Alachua could not achieve whatever growth path it chooses for itself over half a century.” The report also concludes that “over a horizon of 50 years, it makes little sense to imply anything is known with a high degree of certainty – there are too many things about the future that are crucial but unknown.” In other words, Plum Creek’s proposed land uses may provide economic development opportunity over the next 50 years or they may not, it is impossible to predict. Proposed EASP Policy 10.2.6.4 EA-EOMU Jobs to Housing Balance states in part that:

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

- a. Achieve a jobs-to-housing balance of 3 jobs per residential unit that is measured over the entire land use category (that is, jobs divided by residential units meets or exceeds 3.00 at total project build out).

The projected three jobs per residential unit equates to the 30,000 jobs used in the *Plum Creek, UF and Economic Growth in the Gainesville Region* report discussed above. The *Fiscal Impacts of the Envision Alachua Sector Plan for Alachua County* analysis by Fishkind & Associates Economic Consultants submitted with the application indicates that the number of employees for the development program at buildout is 27,362 (Appendix Table 1, Year 2067). Presumably, this number includes both full- and part-time employment. The same table indicates Full Time Equivalent (FTE) employees as 6,515. FTE employees represents the number of full time positions if one were to add all employment hours and divide by the standard work week. Based upon the 10,500 units proposed by the Sector Plan, the employment would be 2.6 employees per unit or 0.62 FTE employees per unit. (see full discussion of this Fiscal Impact report submitted by the applicant under Section VI FIAM Analysis of this Staff Report). The FIAM report, submitted as data and analysis to support the proposed policies, does not seem to be consistent with the proposed policies. In any case, both the *Fiscal Impacts of the Envision Alachua Sector Plan for Alachua County* report and the *Plum Creek, UF and Economic Growth in the Gainesville Region* report. Also submitted with the application as supporting material, are predicated on full buildout of the development, which is not guaranteed by policy or even likely, especially for a proposed plan with a 50 year time horizon.

In addition to determining whether this proposed amendment would or could generate almost 30,000 jobs, there are other aspects that the applicant’s report should have considered to be proper analysis. The costs to the County to provide urban service to this rural location and

environmental impact costs are not factored into the economic analysis. The applicant's report also does not take into account whether this type of growth would be more efficient and fiscally beneficial to the County and its citizens if proposed within the Urban Cluster. The best location for the proposed land uses, even within Plum Creek's own property, was not adequately evaluated. The report does not reach a solid conclusion with a high degree of certainty and the data does not support the proposed amendment to the County's current land use designations for the area.

The Principles and Strategies in the adopted Comprehensive Plan relating to promotion of economic opportunity and a sustainable and economic future of residents at all wage and skill levels are translated into more detailed policies primarily in the Future Land Use Element and the Economic Element of the adopted Comprehensive Plan.

One of the issues addressed in the 2009 Evaluation and Appraisal Report (pp. 138-151) on the Alachua County Comprehensive Plan was the changing nature of industrial uses in the 21<sup>st</sup> century and the relationship of those changes to the type and location of space for those uses sought by emerging types of businesses. A strategy identified in the EAR to address this change was to "update policies on Industrial and Office land use consistent with employer workforce needs and emerging Industrial and Office trends to facilitate recruiting of targeted industries to the County." Based on this, as part of the County's Comprehensive Plan update adopted in 2011 there were "changes to the Industrial policies ... to clarify and update the descriptions of the industrial future land use categories consistent with current industry trends." (EAR-Based Comprehensive Plan Update Data and Analysis-Future Land Use Element for Board of County Commissioners Adoption Hearing April 5, 2011 pp.5-7). This included Future Land Use Element Policy 4.3.1, added to the Comprehensive Plan in 2011, to provide for location within Transit Oriented Developments or Activity Centers in the Urban Cluster of "certain office and light industrial uses, such as research and development and experimental laboratories or the manufacturing or fabrication of products that have minimal off-site impacts." This adds to the potential for location of new Industrial uses above and beyond the 1,907 acres designated specifically for industrial uses on the County's Future Land Use map (including the Eastside Activity center located around State Road 20 and SE 43<sup>rd</sup> Street in the Urban Cluster, and 7,403 acres designated in municipal comprehensive plans (such as the undeveloped Business Industrial Park near Gainesville Regional Airport designated in the City of Gainesville's Comprehensive Plan and 448 acres designated for Industrial use, of which 368 acres is undeveloped, in Hawthorne).

Staff evaluated the application as it relates to the Comprehensive Plan *Objective 8.5 Plan East Gainesville* and subsequent policies. Plan East Gainesville is a comprehensive economic revitalization plan for the eastern urban areas of Gainesville and Alachua County. The Plan, originally developed in the early 2000s, was a cooperative effort of the Metropolitan

Transportation Planning Organization (MTPO), Alachua County, and the City of Gainesville that involved widespread public participation and input over the course of a few years. The planning process resulted in a special area plan for East Gainesville which balanced land development, environmental protection, and improved transportation mobility.

The Plan East Gainesville study area includes about 21,000 acres in unincorporated Alachua County and the City of Gainesville. The study area is generally bounded by the Gainesville Regional Airport on the north, Newnan's Lake on the East, Paynes Prairie on the south, and downtown Gainesville on the west. The University of Florida, Shands, and VA employment centers are also considered part of the study area as they relate to East Gainesville, primarily through transportation systems and access to employment.

The Plan East Gainesville Master Plan map and policies relating to the unincorporated area initiatives were adopted as part of the Alachua County Comprehensive Plan in 2006. Several of these Plan East Gainesville initiatives have been completed or are currently underway. An update of the Eastside Activity Center Plan was completed in 2009 for the area located north of the intersection of Hawthorne Road (State Road 20) and SE 43<sup>rd</sup> Street, and surrounding Eastside High School. The Eastside Activity Center Plan provides a policy framework to encourage the development of this area as a mixed use activity center for the eastern part of the Urban Cluster, including higher density residential, commercial, and employment-based land uses. The County's Comprehensive Plan also identifies a bus rapid transit route connecting the Eastside Activity Center with existing employment centers in Gainesville. The proposed sector plan is located several miles east of the eastern boundary of the Plan East Gainesville study.

Affordable housing is another component to consider as part of the Future Land Use Element Policy 7.1.3(d) (2). Affordable housing has not been proposed in the Sector Plan. Proposed EASP Policy 10.2.6.5 does state "Residential development within the EA-EOMU shall provide a range of residential options that expands the housing choices for existing and future residents of Alachua County,... and To provide for a greater range of choices of housing types in single-family residential areas, affordable housing, and the promotion of infill to new and existing neighborhoods while maintaining single family character, one accessory dwelling unit shall be allowed on single family residential lots." Neither of these proposed policies ensures the provision of affordable housing in this proposed development that would have the population size of all municipalities in the County added together except Gainesville. Adopted Housing Element Policy 1.1.4 states that *It is the policy of the Board of County Commissioners to promote the dispersion of newly built affordable housing units within developments throughout the entire County. This should include areas which are proximate to schools, shopping, employment centers, daycare facilities and transit corridors.* If this proposed amendment would eventually be reviewed as a Development of Regional Impact (DRI), an analysis of

affordable housing in the area would be required and, if found lacking, affordable housing would have to be provided by the developer. Sector Plans are, however, exempt from the DRI statutes. While affordable housing is not addressed in the sector plan statute, it is County policy to ensure that affordable housing is dispersed throughout the community (Housing Element Policy 1.1.4) and policies could be created to ensure that some of the proposed housing would be affordable. According to the proposed application, a range of jobs would be provided, including those at or near minimum wage. Absent a specific provision for affordable housing in this new development, future affordable housing is likely to continue to be concentrated nearby in areas such as East Gainesville and Hawthorne.

*Future Land Use Element Policy 7.1.3*

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

*...*

*(3) relationship to existing and planned future urban services and infrastructure*

Plum Creek's proposed EA-EOMU designated property is located approximately 4 miles outside of the closest Urban Cluster boundary and is separated from the cluster by Newnan's Lake.

There are no future urban services and infrastructure planned by the County for this area. While the *Public Facilities Needs Analysis* by CHW, Inc. and the *Transportation and Transit Analysis* by Kittelson and Associates, Inc., submitted as part of the data and analysis of the application, both find that the proposed development would create a need for public facilities and infrastructure including schools, water and sewer facilities, and roads, there are no proposed specific policies to provide for and fund these facilities. The proposed amendment to the Capital Improvements Element does include a short list of transportation improvements but no costs or funding sources are associated with them. Emergency services such as fire rescue and law enforcement needs are not included as a part of this analysis either so the applicant provided no data to determine the effect this amendment would have on emergency services provision. The impact of 10,500 dwelling units and 15.5 million square feet of non-residential would be substantial though, and would not be able to be covered by current County capabilities. In addition, significant extension of utilities into the rural area could provide an incentive for further sprawl on adjacent properties in these areas creating even more expansive inefficient and expensive provision of services. Further analysis is included in Section VI Public Facilities and Services.

*Future Land Use Element Policy 7.1.3*

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

*...*

*(4) access to the regional transportation network and multi-modal transportation systems*

Plum Creek's proposed EA-EOMU property is located on State Road 20, SR 26 and along US 301. There is currently no multi-modal transportation system serving the area. The Alachua County Mobility Plan has planned for a network of multi-modal transportation systems serving the urban area within the Urban Cluster. Effective delivery of enhanced transit, bicycle and other modes of transportation is typically associated with dense mixed-use development. The subject property is also isolated from existing Urban Cluster connections to existing bicycle/pedestrian facilities. The distances between the five proposed development nodes and to the nearest municipalities makes the provision of transit with reasonable headways very inefficient. Further analysis is included in Section V Transportation Analysis.

*Future Land Use Element Policy 7.1.3*

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

*...*

*(5) Conservation and Preservation land uses*

Adopted Policy 3.1.1 of the Conservation and Open Space Element (COSE) states *Conservation Areas shall consist of natural resources that, because of their ecological value, uniqueness and particular sensitivity to development require stringent protective measures to protect their ecological integrity.* Strategic Ecosystems (Conservation and Open Space Element Objective 4.10 and Policies 4.10.1-4.10.8) are one of these conservation areas that are so designated because of their native biodiversity, ecological integrity, rarity, functional connectedness, documented listed species, high vegetation quality and species diversity. Strategic Ecosystems have their own policy protections within the Conservation and Open Space Element of the Comprehensive Plan. The proposed EA-EOMU area is almost entirely within Strategic

Ecosystems and contains every item on the conservation area list: wetlands, surface waters, 100-year floodplains, listed species habitat, and significant geologic features. The proposed natural resource protection policies remove County authority to regulate wetlands in the areas proposed for the most intense development.

Proposed EASP General Strategy 4, discussed previously, has as a component purporting to protect and retaining regionally significant lands for conservation, habitat protection and wildlife connectivity. However, the proposed policies to meet this component of the strategy only require protection of state recognized regionally significant conservation lands and not those that are recognized as significant to Alachua County. In addition, proposed EASP Policy 10.0.1 discusses conservation lands within the Envision Alachua Sector Plan and states in part that the conservation lands were so designated ensuring sufficient lands to accommodate future needs of Alachua County for jobs creation centers and expanding population. The Objective goes on to state that Conservation Lands were identified in locations that would protect valuable natural resources, particularly those that support the long term economic and environmental objectives of Alachua County and then lists a set of criteria for identifying the conservation lands. The proposed future land use map for the EASP does not appear to follow these criteria. More specifically, following these specific criteria in the current policy, listed below, should have resulted in more aggressive conservation land allocation in the areas around Lochloosa Creek and east of Newnan's Lake. In addition, the criteria of ensuring sufficient lands to accommodate future needs of Alachua County for job creation centers and expanding population is not consistent with current County policy for defining conservation lands.

#### *Conservation and Open Space Policy 3.1.1*

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

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

The criteria listed in Conservation and Open Space Policy 3.1.1 for determining what is a conservation resource is not the same as the method proposed by the applicant and these two different methods of identifying lands to be considered conservation lands are potentially conflicting. They create two different objectives for identifying such lands without data to support the different identification in Envision Alachua lands versus similarly situated properties outside of the Sector Plan. The proposed area for urban land uses (Envision Alachua Employment Oriented Mixed Use area) also has a list of criteria of how they were located, one of which is “land suitability for concentrated, mixed-use economic development” (Proposed EASP Policy 10.0.2). There is no data to support this proposed language. For example, Area A on the proposed land use maps is the area that will have the most compact, mixed-use area within the Employment Oriented Mixed Use category that covers approximately 11,393 acres. Area A is also the area with the most wetlands and flood plains of all the areas within the EOMU.

The proposed natural resources protection policies vary by Area of the Envision Alachua Sector Plan. Areas D and E and part of C are protected consistent with adopted Comprehensive Plan policies. Proposed EASP Policy 10.3.1.4 titled *Area A Natural Resources Protection* states that “The County recognizes and determines that the concentration of development within Area A to accommodate a large-scale employment center is of overriding public interest. Therefore limited impacts to natural systems and wetlands within Area A are permitted and wetland acreage and function within Area A shall be protected through compliance with state and federal environmental permitting requirements.” This proposed policy also references the wetland buffer policy and states that any mitigation will be in accordance with state and federal environmental permit requirements. In addition, the policy states that development within the 100 year flood plain will be permitted provided there is no adverse impact as measured by an increase in peak stage or discharge outside of the EASP boundary.

Resource protection for Area B is provided in proposed EASP Policy 10.3.2.4 *Area B Natural Resources Protection*. This proposed policy states that current County regulations for wetlands will be applicable to Area B south of State Road 20 but not north of State Road 20 and that the County recognizes that development slated for Area B is of overriding public interest as to allow impacts to natural systems and wetlands consistent with state and federal regulations. This proposed policy also has the same language as Area A on wetland buffers, mitigation and floodplain impacts. This means that depending on whether a property is north of State Road 20 or south of State Road 20 different policies apply. There is no data and analysis or any known justification that would support adopting policies with differing standards for resource protection.

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

The County's Comprehensive Plan protects the diverse range of natural resources, and therefore Alachua County residents, by protecting air and water quality and species diversity, and it identifies six primary conservation areas and methods for protection, including wetlands, surface waters, 100-year floodplains, listed species habitat, significant geologic features and strategic ecosystems. Critical Ecological Corridors are mapped and protected through a range of tools including regulation, acquisition, and intergovernmental coordination to maintain critical habitat connections within the County and the region. The EASP site contains significant natural resources and is a critical area for both regionally and locally significant natural resources and ecosystems. The data and analysis provided to support the proposed amendments fails to adequately address potentially significant impacts to wetlands, floodplains, impaired water bodies, the Lochloosa Creek Headwaters Flatwoods Strategic Ecosystem, wildlife habitat and wildlife corridors. The proposed amendment has not included data and analysis that would support diverging from the current natural resource protections in the County as analyzed in Section IV Environmental Analysis section of this report. There is also an issue of the equity of applying different resource protection standards to similarly situated properties without data to support the application of those different standards.

*Future Land Use Element Policy 7.1.3*

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

(6) *planned recreation/open space or greenway systems*

The County currently does not have planned public recreation within this areas of the County. The application contains a *Public Facilities Needs Analysis* submitted by CHW, Inc. that looks at recreation levels of service county wide. The County's recreation master plan did not consider a potential population of 24,500 residents in this rural area of the County and, therefore, though the acreage of provided recreation may still meet levels of service, those recreation facilities may be 10 miles from the proposed development. There are notes in the *Public Facilities Needs Analysis*, which is submitted as backup data and analysis, that the recreational offerings will be



established during development review to ensure adequate supplies are present to meet demand. There are no proposed policies to support this.

### **C. Conclusion of Land Use Analysis**

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

While Section 163.3245(3) (a) 7, F.S., states that an applicant for a sector plan is not required to demonstrate need, the applicant has chosen to do so as relates to the industrial land use. Since the applicant has chosen to supply data and analysis on the need for industrial land in the County, staff has analyzed this assumption (Exhibit 2). Staff's analysis concludes that there is a significant amount of undeveloped industrial land within the Urban Cluster and within the municipalities in the County. The applicant, though using data and analysis attempt to demonstrate a need for additional industrial in the County, has not analyzed adopted Comprehensive Plan Policy 7.1.3 as it relates to reallocating land within the Urban Cluster or within incorporated municipalities to address a need prior to considering an expansion of the Urban Cluster.

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

## **IV. Environmental Analysis**

### **A. Summary of Environmental Analysis**

The **Envision Alachua Sector Plan** comprehensive plan amendment involves approximately 60,133 acres of land located in eastern Alachua County and includes map and text amendments to the Alachua County Comprehensive Plan. This Sector Plan, commonly known as Envision Alachua, contains lands owned and managed by the Plum Creek Timber Company, Inc. (Plum Creek) as of June, 2014.

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

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

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

- Inadequate safeguards to manage and permanently protect proposed conservation areas; and
- Long-term disruption to the local hydrology and water resources.

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

The EASP comprehensive plan amendment, if adopted by the County Commission, would replace or supersede many existing Comprehensive Plan environmental objectives and policies with new objectives and policies as listed in Appendix A. The affected environmental objectives and policies include:

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

## **B. Suitability Analysis**

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

### **1. Floodplains**

Existing County Comprehensive Plan policy (COSE Policy 3.1.1) recognizes 100-year floodplains as conservation resources which should be avoided by development. The proposed EA-EOMU area contains a total of approximately 2,959 acres of 100-year floodplain (26% of the total area). However, the applicant is proposing to locate their most intense development in the two areas within the EA-EOMU that have the highest percentage of floodplain area (Area A at 39%

and Area B at 42%, see Table 4 below) which would necessitate development within floodplains.

The proposed EASP amendment states that the County's Comprehensive Plan provisions would only apply to the EA-AG, EA-RUR, EA-EOMU Areas D and E and Area B south of State Road 20 (see Map 7 in the Land use Analysis Section). Proposed **EASP Policy 10.3.1.4.d** for Areas A would allow development within the floodplain: **states that** *"...Development within the 100-year floodplain shall be permitted to the extent that it does not result in adverse impacts as measured by an increase in peak stage or discharge outside of the EASP boundary. Compensating storage areas may be utilized on an EASP-wide basis to mitigate the potential for adverse impacts that could occur as a result of an increase in peak stage or discharge outside of the EASP boundary."* The same language is included in proposed **EASP Policies 10.3.2.4.d**

(re. Area B), **10.3.3.4.d** (re. Area C) **and 10.4.2.2** (Floodplain Development Standards).

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

The proposed language, if adopted, would thus exclude a significant portion of the EA-EOMU Land Use area from current 100-year floodplain protection standards, which prohibits the subdivision of land that would create new lots lacking sufficient buildable area outside of conservation areas (*i.e.*, floodplains).

There are no compelling or reasonable rationales offered to justify exempting proposed development in Area A, most of Area B, and Area C from current County floodplain protection policies (as well as wetland policies, which is addressed in following sections), while subjecting Area D, E, and other areas within the plan to current County floodplain (and wetland) protection policies.

In addition, it is unclear how the applicant will comply with compensatory storage requirements. Natural wetlands and floodplains should be avoided, but the applicant is not showing that this will be the case, nor providing any policies that direct development away from these flood prone areas. Based on the intensity of proposed uses, a significant amount of floodplain resources will be impacted.

## 2. Community Rating System (CRS)

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

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

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

The CRS program incentivizes local communities to reduce their flood risk by having programs that avoid development in the floodplain, avoid floodways, provide buffers etc. that protect floodplains. The overall goal of these programs is to reduce flooding risk by discouraging development in floodplains and building habitable structures that are higher than the 100-year floodplain. For development areas of the proposed Envision Alachua Sector Plan where the ground water table is generally very high, avoidance is a key to protect the natural areas and reducing the risk of flooding. The proposed EASP policies seek to control peak stage or discharge outside of the EASP boundary but do not specify requirements inside the EASP boundary. Analysis of the peak stage inside the EASP boundary is critical as the buildings proposed (10,500 homes and the 15.5 million square feet non-residential uses) and their related infrastructure (roads, etc.) have to be above the 100-year floodplain level to minimize flooding risk. The proposed EASP policies, if adopted, may result in a downgrading of the County's CRS Rating, which will in turn affect the insurance discount rate that County residents and businesses currently enjoy.

**Deficiency in proposed amendments:** Sec. 163.3177(f), Fla. Stat., requires that comprehensive plan amendments be based on appropriate data and analysis. No data and analysis was provided to support treating certain areas of the EASP differently from others with regards to

floodplain protection. Comprehensive plan policies must react to the data and analysis in an appropriate way and to the extent necessary, Sec. 163.3177(f), Fla. Stat. The proposed EASP floodplain policies are not based on data and analysis. The applicant did not include propose necessary policies. The applicant has not proposed specific policies to protect and maintain the natural functions of the floodplains, floodways and all other natural areas having hydrological characteristics of the 100-year flood elevation. The proposed EASP policies lack key components of the existing Comprehensive Plan (which is supported by data and analysis), such as watershed management, watershed planning, development of specific standards in areas of special flood hazard, connectivity of floodways, and provision of buffers within the special flood hazard areas.

### 3. Wetlands

According to the applicant’s analysis of SJRWMD land use/land cover data maps, the entire EASP area (60,133 acres) contains approximately 18,210 acres of wetlands and surface waters (30.3% of land area). Approximately 2,020 acres of wetlands exist within the 11,390 acres of the urban land use (EA-EOMU) designated in the proposed plan amendment (see Table 3), or about 18% of the land area within EA-EOMU. However, within the area identified for most intense development, Area A, wetlands comprise approximately 24% of the land area (see Table 3).

Development Area	Total Acreage	Estimated Wetlands	Uplands	% wetlands
Area A	2,893	688	2205	24%
Area B	1,284	288	996	22%
Area C	2,760	369	2391	13%
Area D	3,634	543	3091	15%
Area E	819	133	686	16%
Total	11,390	2,020	9370	18%

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

To achieve an accurate calculation of wetland area, the exact extent of wetlands has to be “groundtruthed,” *i.e.*, verified on-site by professional staff (using wetland delineation methodology in 62-340 F.S.), and oftentimes wetland maps vary across sources since they rely on aerial interpretation (remote sensing) which has a margin of error. Utilizing a variety of available surface water and wetland data and Federal Emergency Management Agency data, staff calculated a likely range of surface water and wetland acres and floodplain acres for each area within the EA-EOMU (Table 4).

Development Area	Total Acreage	Range of wetland acres	% range of wetlands	Floodplain acreage	% floodplains
Area A	2,893	665-984	23 – 33%	1,120	39%
Area B	1,284	281-388	22 – 30%	534	42%
Area C	2,760	332-494	12 – 18%	582	21%
Area D	3,634	514-741	14 – 20%	616	17%
Area E	819	126-180	15 – 22%	107	13%
Total	11,390	1,918 – 2,787	17% - 25% avg	2,959	26% avg

**TABLE 4: POTENTIAL RANGE OF SURFACE WATER AND WETLAND ACRES\* AND FLOODPLAIN ACRES\*\* FOR AREAS OF THE EOMU**

\*Sources: SJRWMD Land Use/Land Cover 2009 (hydric components), National Wetlands Inventory, National Hydrography Dataset, Alachua County Soil Survey (hydric components)

\*\*Source: 2006 Flood Insurance Rate Maps for floodplain acreage

Proposed **EASP Policy 10.4.2.1** would apply the provisions of the Alachua County Comprehensive Plan and associated Land Development Regulations relating to wetland protection for the EA-AG, EA-RUR, EA-EOMU Areas D and E and the portion of Area B south of State Road 20.

By contrast, proposed **EASP Policies 10.3.1.4, 10.3.2.4, and 10.3.3.4** would remove the County's authority to determine if wetland impacts are appropriate (COSE Policies 4.7.1, 4.7.4, & 4.7.7) within EA-EOMU Area A, Area B north of SR 20, Area C, and EA-CON where road crossings are proposed. Wetlands will be protected only through compliance with state and federal environmental permitting requirements. Map 8 shows the areas that will not be subject to County wetland protection standards or that will be partially not subject to County regulations under the proposed EASP policies.

State and Federal environmental permitting rules are, in certain ways, less effective at requiring avoidance and minimization of impacts to wetlands. State agencies, for example, must consider mitigation proposals from an applicant at the same time the agency is negotiating avoidance and minimization (Sec. 10.2.1 & Sec. 10.3, Applicant's Handbook, which is a regulatory publication used by FDEP and the Water Management Districts in implementing the Environment Resource Permitting Rule (62-330, F.A.C.)). The County appropriately segregates these considerations to ensure practicable alternatives to permitting impacts are fully explored prior to entertaining proposals for mitigation of unavoidable impacts. Even in a case where the County Commission determines that impacts to wetlands are unavoidable and compensatory mitigation efforts are appropriate, existing Comprehensive Plan policy limits the magnitude of impacts that may be approved by the Board (COSE Policy 4.7.4). State and Federal agency approvals are subject to no such limitations. Further, State agencies cannot require avoidance

and minimization if the “*applicant proposes mitigation that implements all or part of a plan that provides regional ecological value...*” (Sec. 10.2.1.2, Applicant’s Handbook). Under this provision, mitigation might not occur within the same project, the same local drainage basin, or even the same county. In addition, State rules provide less protection to isolated wetlands under one half acre in area (see Sec. 10.2.2.1, Applicant’s Handbook). Federal rules arguably provide no protection to isolated wetlands. The proposed plan amendment does not estimate or establish how many wetlands are intended to be impacted or demonstrate how impacts to these wetlands would be avoided or minimized.

The applicant (Land Use Data & Analysis: Addendum, June 2014) identifies three primary purposes for filling of non-critical wetlands: (1) to enable the creation of concentrated areas for higher density mixed use development, (2) to ensure connectivity to and between development areas, and (3) to accommodate rail spur access to manufacturing sites. The applicant does not define ‘non-critical’ or provide data and analysis for which wetlands would qualify as ‘non-critical.’

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

Proposed **EASP Policy 10.2.6.1** would remove the County’s authority to require undisturbed upland buffers adjacent to wetlands (COSE Policy 3.6.8). Federal and State permitting rules do not require buffers adjacent to wetlands. State agencies may accept narrow buffers (minimum 15 feet, average 25 feet) as one approach to address secondary impacts to the habitat function of wetlands, but these buffers are not mandatory (see Sec. 10.2.7(a), Applicant’s Handbook).

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

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

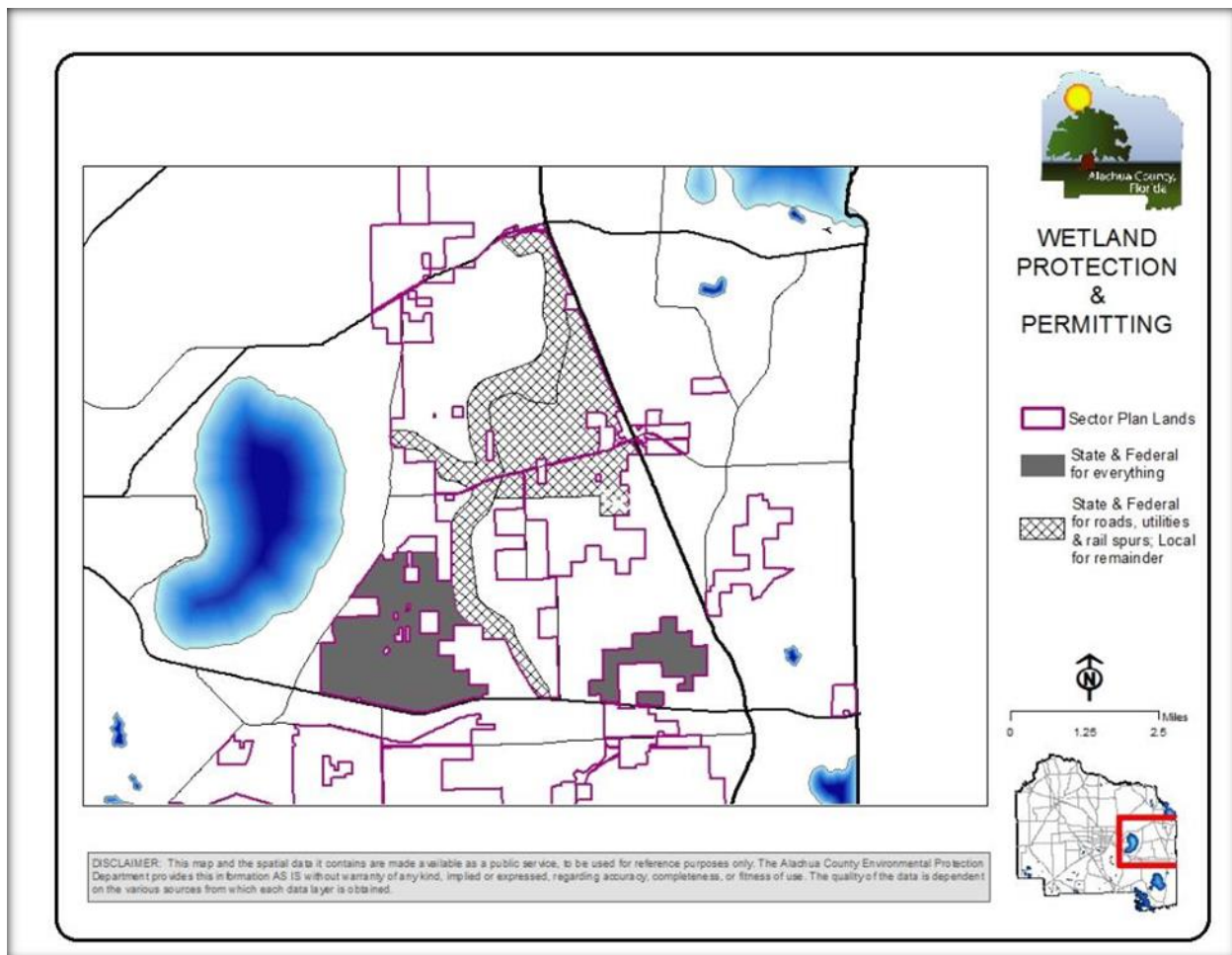
**Deficiency in proposed amendments:** Sec. 163.3177(f), Fla. Stat., requires that comprehensive plan amendments be based on appropriate data and analysis. No data and analysis was provided to support treating certain areas within the EASP differently from other areas within the EASP with regards to wetland protection. No data and analysis was provided to justify treating the EASP lands differently than similarly situated properties outside of the EASP. Comprehensive plan policies must react to the data and analysis in an appropriate way and to



the extent necessary, Sec. 163.3177(f), Fla. Stat. The proposed EASP wetland policies are not based on data and analysis.

#### REFERENCES:

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



**MAP 7: MAP OF EASP AREAS PROPOSED FOR ONLY FEDERAL AND STATE WETLAND PERMITTING REQUIREMENTS AND AREAS PARTIALLY PROPOSED FOR FEDERAL AND STATE WETLAND PERMITTING REQUIREMENTS**

#### **4. Soils/High Water Tables**

The applicant provided data and analysis of the soils within the EASP. The applicant's data and analysis states that the majority of the property (58%) has A/D class soils. Group A soils have a

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

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

According to the Alachua County Soil Survey (USDA NRCS, 1985), the majority of the soils in the EA-EOMU area (10,880 acres of the total 11,390 acres or approximately 95%) consists of somewhat poorly drained to very poorly drained soils (Table 5 and Map 9 and Map 10, below).

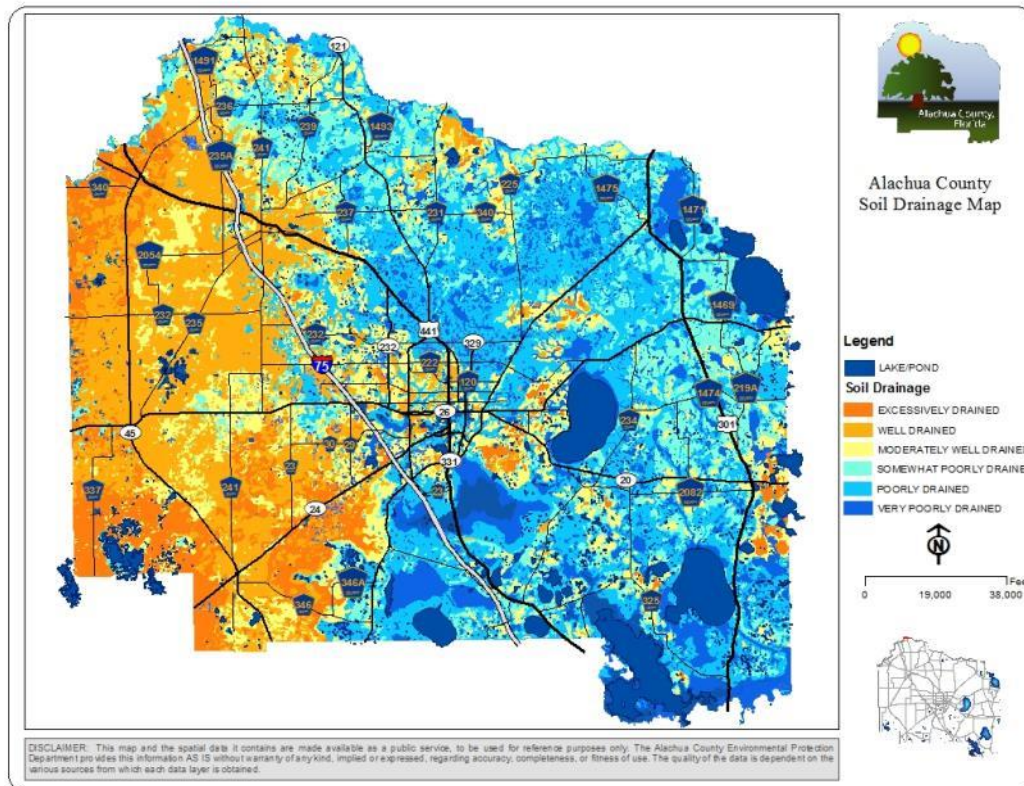
Development Area	Soil Drainage Class*	Acres	% of Area	
A	Moderately well drained	124.3	4.3%	95.77
	Somewhat poorly drained	445.3	15.4%	
	Poorly drained	1,584.7	54.8%	
	Very poorly drained	736.6	25.5%	
	Water	1.9	0.07%	
B	Moderately well drained	71.9	5.6%	94.4
	Somewhat poorly drained	407.5	31.7%	
	Poorly drained	521.5	40.6%	
	Very poorly drained	283.4	22.1%	
C	Moderately well drained	166.3	6.0%	94%
	Somewhat poorly drained	1429.8	51.8%	
	Poorly drained	824.5	29.9%	
	Very poorly drained	339.8	12.3%	
D	Moderately well drained	147.2	4.0%	96
	Somewhat poorly drained	2,138.6	58.9%	
	Poorly drained	910.7	25.1%	
	Very poorly drained	437.4	12.0%	
E	Somewhat poorly drained	184.6	22.6%	100
	Moderately poorly drained	541.3	66.1%	
	Very poorly drained	92.7	11.3%	

**TABLE 5: ACREAGE AND PERCENT OF EACH SOIL DRAINAGE CLASS BY DEVELOPMENT SUB-AREA WITHIN THE EOMU**

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

For example, the most common soil in Area A, which is the area proposed for the most intense uses, is Pomona sand (Map Unit #14 – USDA NRCS, 1985). This soil type is described as having "severe limitations for urban uses, including absorption fields for septic tanks, dwellings,

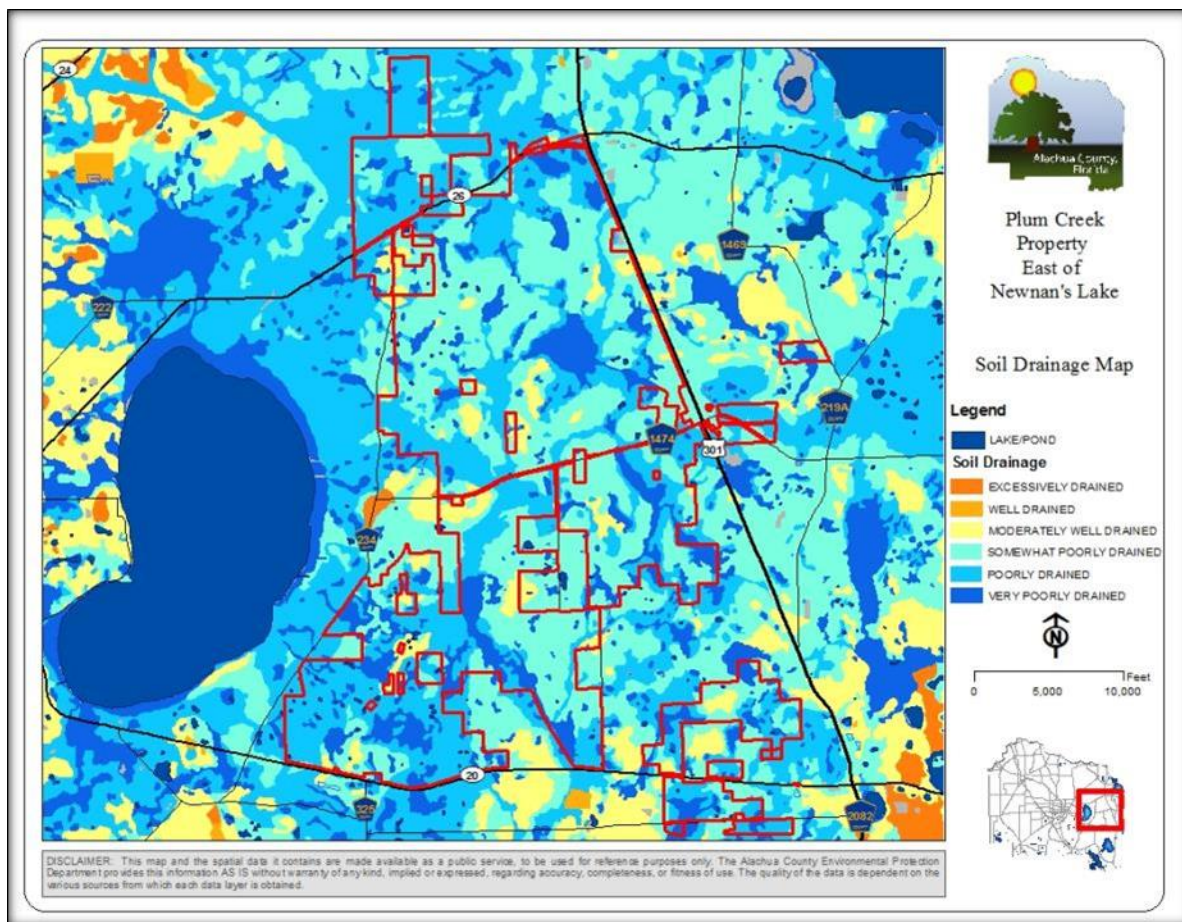
*commercial buildings...roads and streets.”* The Alachua County Soils Survey (USDA NRCS, 1985) also states that wetness is the major problem, with the water table often being within 10 inches of the surface for 1 to 3 months during the wet season. According to the Alachua County Soils Survey, the next most common soil in Area A is Sparr fine sand (Map Unit #50 – USDA NRCS, 1985) which has moderate to severe limitations for most urban uses (USDA NRCS, 1985).



**MAP 8: SOIL DRAINAGE MAP OF ALACHUA COUNTY**

The data and analysis offered by the applicant is not appropriate, as it did not consider the Alachua County Soils Survey. The applicant's proposed EASP policies do not react in an appropriate way to the severe limitations for urban uses exhibited by the majority of soils within the EA-EOMU, as determined by data and analysis conducted by staff.





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

**a. *Evapotranspiration, Surface Waters and Surficial Aquifer Water Levels***

Poorly drained soils have a high water table that supports surface waters and wetlands and their associated ecosystems. Even what appear to be 'isolated' wetlands are often interconnected just beneath the soil surface by the shallow water table. Evapotranspiration (ET) and direct evaporation from lakes (open water) are two of the primary water losses within the Orange Creek Basin. Evaporative loss from open water can be greater than ET from pine flatwoods. Evaporative losses in the large lakes in the Orange Creek Basin were reportedly equivalent to annual rainfall amounts of approximately 52 inches per year (Adkins and Rao, 1995).

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

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

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

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

#### REFERENCES:

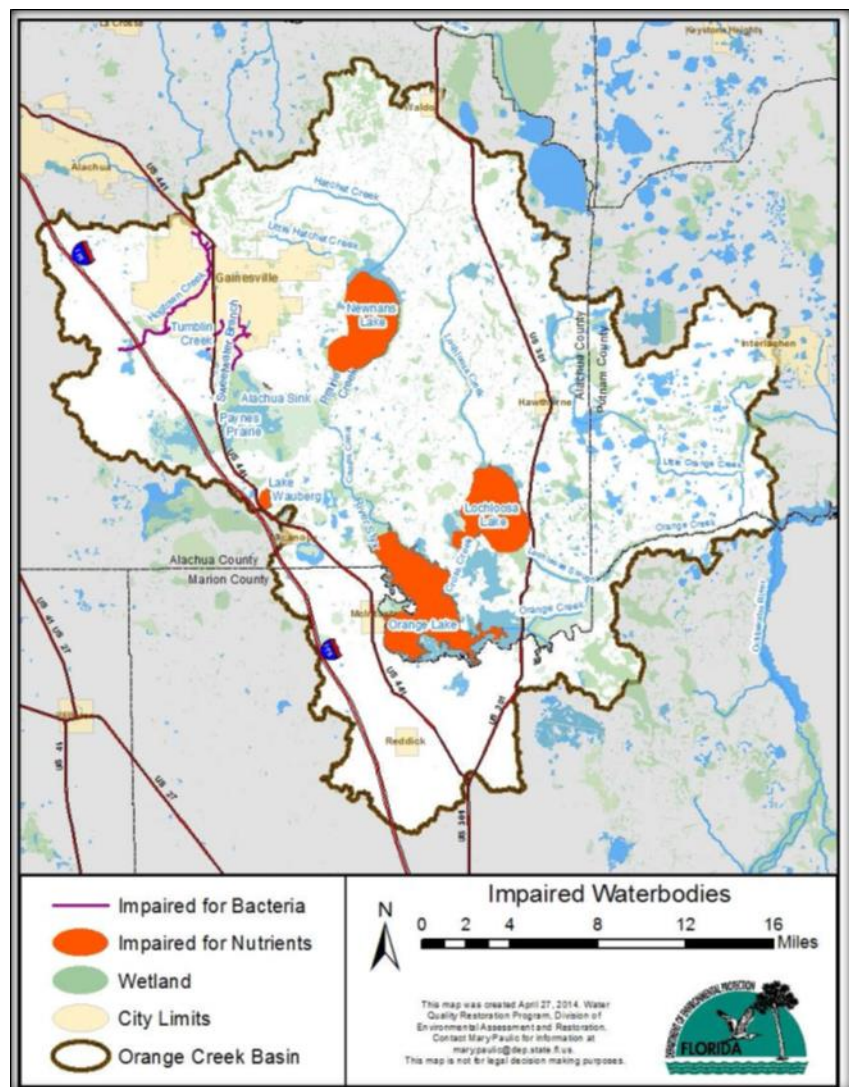
- Adkins, M. and D.V. Rao. 1995. A surface water hydrologic reconnaissance: upper Orange Creek Basin, north-central Florida. Technical Publication SJ95-4. St. Johns River Water Management District.
- USDA NRCS. 1985. Soil Survey of Alachua County, Florida. United States Department of Agriculture, Soil Conservation Service.

## 5. Surface Waters and Impaired Water Bodies

The proposed **Envision Alachua Sector Plan** application proposed that the County Commission amend the Comprehensive Plan to change the current land use designation of Rural/Agriculture over much of the applicant's property to a more intense land use designation within the 11,390 acre Envision Alachua Employment Oriented Mixed Use Area. Proposed land use changes within the Orange Creek Basin may increase nutrient loading to impaired waterbodies and further impact Lochloosa Lake, an Outstanding Florida Water.

The EASP is located in two major watersheds within the Orange Creek Basin, Lochloosa (encompassing Lochloosa Creek and its downstream receiving water Lochloosa Lake) and Newnan's Lake (Map 11). Newnan's and Lochloosa lakes have been determined by the Florida Department of Environmental Protection (FDEP) to be impaired waters under the Florida Watershed Restoration Act (Chapter 403.067, Florida Statutes [F.S.]) and the Impaired Surface Waters Rule (Rule 62-303, Florida Administrative Code) (FDEP, 2008). Both Newnan's Lake and Lochloosa Lake are impaired for nutrients (nitrogen and phosphorus, Figures 3 and 4).

A Total Maximum Daily Load (TMDL) was developed for Newnan's Lake in 2003 (Gao and Gilbert, 2003). A TMDL is a calculation of the maximum amount of a pollutant that a waterbody can receive and still meet water quality standards, and an allocation of that pollutant load among the various sources of that pollutant. A basin management action



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

plan (BMAP) outlining projects for water quality improvement in the Orange Creek basin was completed in 2007 and adopted in 2008 (FDEP, 2008). Although a TMDL has not been adopted for Lochloosa Lake, possible management actions to decrease nutrient loading to Lochloosa Lake were included in the 2007 BMAP because of the potential improvement in water quality (in Lochloosa Lake) that could improve water quality downstream in Orange Lake, which has a TMDL for phosphorus (FDEP, 2008). Development of the TMDL for Lochloosa Lake is currently underway and will be completed during Phase 2 of the BMAP implementation (FDEP, 2014a).

The 2007 BMAP recognizes the potential for land use change and the need to minimize effects (FDEP, 2008). In June 2014, the *Final Orange Creek Basin Management Action Plan Phase 2* (Phase 2 BMAP) was adopted by FDEP Secretarial Order, July 11, 2014. The Phase 2 BMAP states that “*Water resources in these watersheds are sensitive and development of the area provides unique challenges.*” and that “*There is the potential for water resources to be impacted by development.*” The EASP has the potential to adversely impact water resources and contribute to water quality impairment.

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

The proposed EASP policies do not adequately address the use of treated wastewater. Use of treated wastewater for environmental restoration can have adverse impacts and can lead to further negative water quality impacts. Proposed **EASP Policy 10.4.3.4** states “*...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 partnership.*” Wastewater, even if treated to advanced treatment standards with nutrient removal, still contains nitrogen and phosphorus that could adversely impact groundwater and surface water quality. Proposed **EASP Policy 10.5.2.1** states that there will be connection to a centralized sanitary sewer system for services by FDEP permitted

wastewater treatment plants. Advanced waste treatment with nutrient removal must be specifically addressed in the policies for the protection of groundwater and surface water quality (COSE 4.6.16).

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

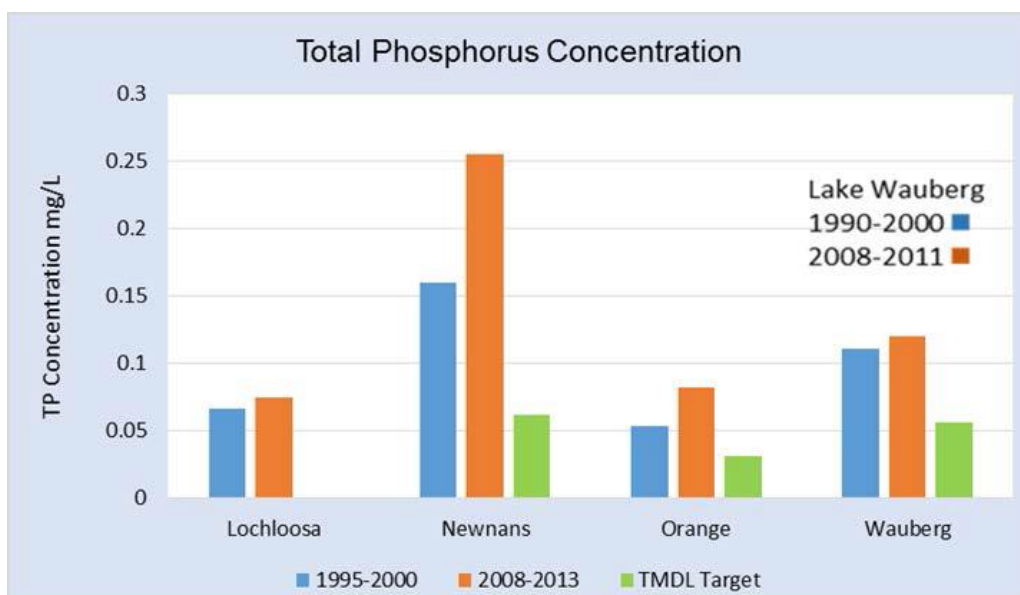


FIGURE 3. COMPARISON OF ANNUAL AVERAGE TP CONCENTRATION BETWEEN THE TMDL DATA PERIOD AND POST-BMAP DATA PERIOD (FROM FDEP, 2014).



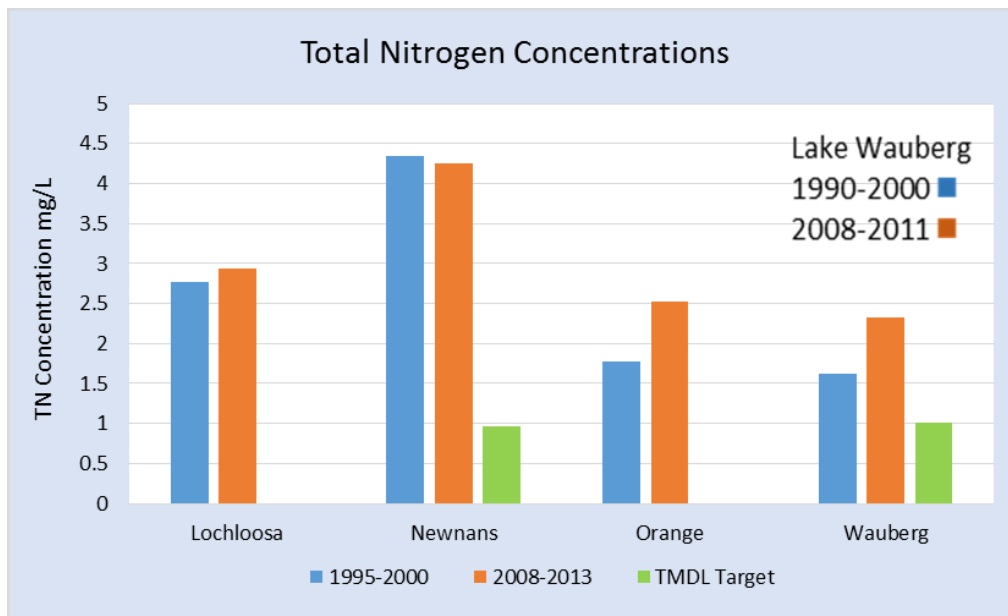


FIGURE 4. COMPARISON OF ANNUAL AVERAGE TN CONCENTRATION BETWEEN THE TMDL DATA PERIOD AND POST-BMAP DATA PERIOD (FROM FDEP 2014).

#### REFERENCES:

- Florida Department of Environmental Protection (FDEP). 2008. *Orange Creek Basin Management Action Plan*. Developed by the Orange Creek Basin Working Group in Cooperation with the Florida Department of Environmental Protection, Division of Water Resource Management, Bureau of Watershed Management, Tallahassee, Florida. May 27, 2008.
- Florida Department of Environmental Protection (FDEP). 2014. Basin Management Action Plan Phase 2 for the Implementation of Total Maximum Daily Loads adopted by the Florida department of Environmental Protection in the Orange Creek Basin. Prepared the Florida Department of Environmental Protection, Division of Environmental Assessment and Restoration, Water Quality Restoration Program, Tallahassee, Florida in cooperation with the Orange Creek Basin Working Group. June 2014.
- Gao, X., and D. Gilbert. 2003. Final Nutrient Total Maximum Daily Load for Newnan's Lake, Alachua County, Florida. Tallahassee, Florida. Watershed Assessment Section, Florida Department of Environmental Protection. September 22, 2003.

## 6. Phosphorus

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

**Deficiencies in proposed amendments:** Sec. 163.3177(f), Fla. Stat., requires that comprehensive plan amendments be based on appropriate data and analysis. The proposed amendments do not provide sufficient data and analyses to address concerns associated with development within potentially phosphorus rich soils, including development's potential to mobilize phosphorus through construction of stormwater management facilities, roads, and use of fill materials excavated and placed elsewhere onsite. Comprehensive plan policies must react to the data and analysis in an appropriate way and to the extent necessary, Sec. 163.3177(f), Fla. Statute. The applicant did not provide policies to address development in phosphorus rich soils.

## 7. Strategic Ecosystems

The EASP includes 32,667 acres of strategic ecosystems, as identified in the Alachua County Comprehensive Plan, which span all or portions of thirteen different strategic ecosystems (*see* Map 13). Strategic ecosystems are identified in the KBN/Golder Associates report, "Alachua County Ecological Inventory Project" (1996) as communities that add to the potential to promote connectivity and minimize fragmentation of natural systems and conservation features. Conservation and Open Space Element Objective 4.10 and associated policies are adopted in the Alachua County Comprehensive Plan to ensure that the ecological integrity of each strategic ecosystem is sufficiently protected.

Proposed **EASP Policy 10.4.1.4** states that "...the designation of 46,080 acres of land within the EASP as EA-CON land use fulfills requirements of Objective 4.10." Included in the 46,080 acres are 22,865 acres of property under existing conservation easements where development rights have already been removed. Thus, rather than analyze each strategic ecosystem to identify areas deserving protection based on overall integrity, the proposed amendment declares consistency by land use designation absent evaluation. This lack of analysis is not consistent

with Alachua County COSE Policy 4.10.5, which states that *“Each strategic ecosystem (SE) shall be preserved as undeveloped area, not to exceed 50% of the upland proportion of the property.”* Developed areas within strategic ecosystems shall be further designed in a manner which will reduce impacts to the remaining areas of the strategic ecosystem. COSE 3.6.10 states *“[T]he intensity of development on land adjacent to conservation and preservation areas shall be determined based on the unique characteristics of the conservation area. Land use shall be consistent with natural resource protection.”* And COSE 3.6.7 states *“Development shall not be allowed at the maximum densities and intensities of the underlying zoning district, if those densities would be harmful to natural resources.”* The County requires clustering of rural residential developments over 24 units and allows for density bonuses associated with clustering of properties and the permanent protection of conservation areas. The EASP, if adopted and developed, would significantly negatively affect the ecological integrity of Lochloosa Creek Headwaters Flatwoods Strategic Ecosystem. Based on proposed **EASP Policy 10.4.1.4** and lack of data and analyses for this strategic ecosystem, it appears that the applicant is proposing that the County sacrifice the long-term success of all strategic ecosystems between or near SR 20 and SR 26 in exchange for the designation of conservation over all other strategic ecosystems on lands in their ownership. Existing County policies are written specifically to make sure that ecological integrity of each strategic ecosystem is protected.

**Deficiencies of proposed amendments:** Sec. 163.3177(f), Fla. Stat., requires that comprehensive plan amendments be based on appropriate data and analysis. The proposed amendment simply declares that it is consistent with existing policy and do not provide appropriate data and analyses to address concerns about the protection of strategic ecosystems.

## **C. Protection of Natural Systems**

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

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

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

- Enhancement of Lochloosa Creek’s connected wetland system to promote linkages for wildlife habitat

The proposed future land use map for the EASP does not appear to follow these criteria. More specifically, following the criteria listed above should have resulted in more aggressive conservation land allocation in the areas around Lochloosa Creek and east of Newnan’s Lake.

**Proposed EASP Policy 10.4.1.4** Protection of Strategic Ecosystems states *“For the purposes of Objective 4.10 of the Conservation and Open Space Element, the EASP shall be considered as a total parcel area including 60,136 acres. The process of identifying the lands suitable for conservation and the designation of 46,080 acres of land within the EASP as EA-CON Land Use fulfills the requirements of Objective 4.10.”* However, this policy assumes that the process for identifying lands as EA-CON as outlined in proposed **EASP Objective 10.0.1** was followed and is acceptable. None of these criteria are clearly followed nor the related goals achieved by the conservation lands proposed by Plum Creek.

In addition to the areas designated as EA-CON, the proposed amendment does include open space provisions for each EOMU Area. The applicant defines open space *“as any natural, recreational, or common open areas, either publicly or privately owned, set aside, dedicated, designated, or reserved for the private use of enjoyment of owners or occupants of land adjoining such open space, or for the public at large”*(Proposed **EASP Policy 10.2.6.3.3**). This EASP policy goes on to state that *“When land development involves a parcel that contains conservation areas as provided in Policy 10.4.2.1, the open space requirements shall be fulfilled first with conservation areas, then with other allowable types of open space.”* This proposed EASP policy is very similar to the County’s current COSE Policy 5.2.3, which states *“When land development involves a parcel that contains conservation areas, the County’s open space requirements shall be fulfilled first with conservation areas, then with other allowable types of open space.”* Thus, the County’s open space requirements shall be fulfilled first with conservation areas, and then with other allowable types of open space. However, proposed EASP Policy 10.4.2.1 allows the applicant to impact wetlands without county approval, conflicting with the County’s requirement for protecting and avoiding wetland impacts when designating open space.

The proposed EASP amendments, if adopted, would allow development plan design to drive which conservation areas are preserved, rather than incorporating conservation areas protection policies within the overall design and designating development lands away from natural resources. It may be argued that concentrating development within a smaller footprint at the expense of conservation resources is an appropriate development strategy to minimize overall impacts. However, this false choice would not be necessary if a suitable location had been chosen at the outset for this type of urban land use.

## 1. Springs Protection

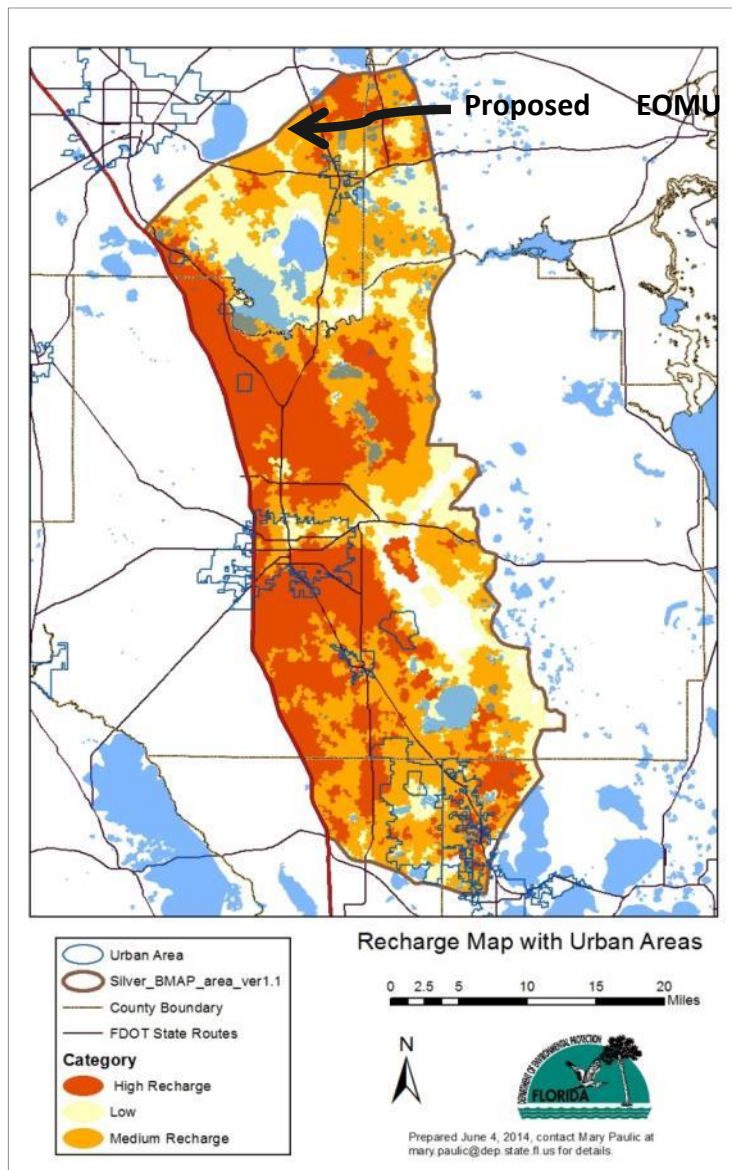
Magnesia Springs is located south of SR 20 and discharges to Lochloosa Creek. The description of Magnesia Springs from the St. Johns River Water Management District is as follows:

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

A portion of the EASP is located within the Silver Springs springshed (see Map 12) and the Silver Springs Basin Management Action Plan (BMAP) area (FDEP, 2014b). This designation must be considered when developing water use and nutrient management strategies for protection of groundwaters and surface waters. The applicant has not demonstrated there will be no adverse impact to springs. No discussion of springs was presented in the data and analysis.

### ***Minimum Flows and Levels***

There are currently no adopted Minimum Flows and Levels for springs in the SJRWMD Water Supply Planning Region 1. However, the Florida Department of Environmental Protection proposed Minimum Flows and



**MAP 11 SILVER SPRINGS BMAP AREA (FDEP, 2014B).**

Levels for the Lower Santa Fe and Ichetucknee rivers and priority springs are likely to affect the

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

#### REFERENCES:

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

Marella, R.L. 2014. Water Withdrawals, Use, and Trends in Florida, 2010. U.S. Geologic Survey Scientific Investigations Report 2014-5088. [ONLINE: <http://pubs.usgs.gov/sir/2014/5088/pdf/sir2014-5088.pdf>]

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

## **2. Strategic Ecosystems**

The applicant has stated that the areas for Conservation Land Use have been identified based upon their contribution to regional landscape linkages, contiguity with existing conservation lands and opportunity to contribute to the conservation and enhancement of natural resources, community watersheds, and natural preserves. However, the Conservation Land Use identified within the EA-EOMU appears to fall short of providing a regional landscape linkage (see *Habitat/Wildlife Corridors* section below for more details) and ignores the current Comprehensive Plan policies for protecting the Lochloosa Creek Headwaters Flatwoods Strategic Ecosystem.

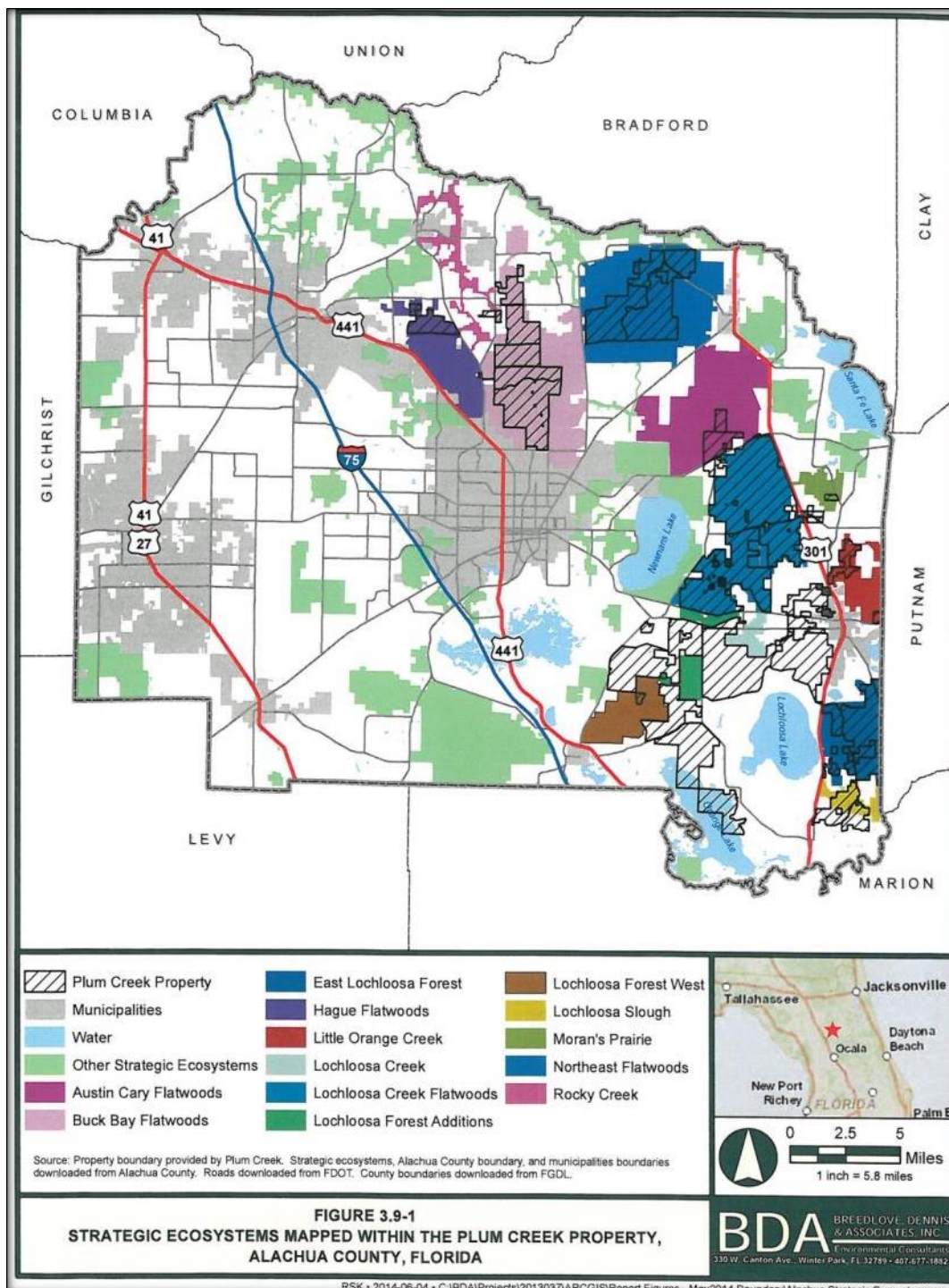
As mentioned previously in the staff report, the entire EASP area has an existing land use designation of Rural/Ag or Preservation and most of the EASP area is within mapped Strategic Ecosystems (Alachua County Comprehensive Plan 2011-2030 COSE Adopted Map #4). Map 13 below, is from the applicant's environmental data and analysis, Figure 3.9-1 showing strategic ecosystems mapped with the Plum Creek properties. On Map 13, areas designated as strategic

ecosystem are recognized as large, connected, environmentally-sensitive areas with specific development standards in place that require that any development within these systems to not negatively impact the ecological integrity of the system.

The applicant is proposing to place only the Lochloosa Creek corridor in Conservation land use with other conservation open space areas to be determined at the time of DSAP. This limited amount of designated conservation area is far less than current County regulations would require for the protection of the Lochloosa Creek Headwaters Flatwoods Strategic Ecosystem without a special area study demonstrating that this lesser amount of protection is warranted. The applicant's data and analysis provided no such study. The EASP, as proposed, would significantly negatively affect the ecological integrity of Lochloosa Creek Headwaters Flatwoods Strategic Ecosystem.

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





MAP 12: MAP OF STRATEGIC ECOSYSTEMS FROM APPLICANT'S ENVIRONMENTAL DATA AND ANALYSIS, FIGURE 3.9-1.

**Proposed EASP Policy 10.4.1.4 Protection of Strategic Ecosystems** states that the process of identifying the lands suitable for conservation and the designation of 46,080 acres of land within the EASP as EA-CON Land Use fulfills the requirements of this objective.



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

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

### **3. Habitat/ Wildlife Corridors**

The proposed wildlife corridor is approximately nine miles long and 2,000 ft. wide and mainly runs along Lochloosa Creek with a western branch connecting to the Newnan's Lake Conservation Area. The corridor is identified as EA-CON (Conservation Land Use).

The EASP area falls within one of the higher priority (Priority 3) corridors within the Florida Ecological Greenways Network (FEGN) (see Map 14). The FEGN is briefly discussed in the applicant's Environmental Data and Analysis. The FEGN has six priority levels. All priority levels of the FEGN are of statewide significance and are relevant to planning from statewide to local scales. In particular, the top three priority levels are of the highest statewide significance, with the most importance for providing a functionally connected network of public and private conservation lands across the state. Priority 3 areas provide significant alternate routes to Priority 1 Critical Linkages. Priority 3 areas are identified as large, intact, functionally connected landscapes potentially capable of providing the same functions as Priority 1 Critical Linkages.

Lands within the FEGN are described as opportunity areas for protecting large, intact, functionally connected landscapes of statewide to regional significance. Not all of the areas within the FEGN need to be included in designed wildlife/ecological corridors to achieve functional protection of these landscape features and the ecological functions they support. Staff recognizes that the FEGN is intended to serve as a general planning tool to guide conservation programs and planning and is not intended to be used as the basis for regulation nor replace data needed to ground-truth features of conservation significance. However,

inclusion within the FEGN warrants careful consideration of the design of proposed protected and developed features to ensure that the natural resource function of these FEGN features are maintained. In general, the higher priority corridors within the FEGN (at least Priority 1-Priority 3) were identified to provide various ecological connectivity functions, from the movement of individuals of fragmentation-sensitive species within home ranges, to dispersal movements of individual animals to provide population and genetic exchange between subpopulations, to providing opportunities for species to adapt to current and future environmental changes (T. Hctor, personal communication).

Proposed **EASP Policy 10.2.6.8** provides no buffer protection to lands identified for Conservation (only a 50' buffer for lands with existing conservation easements). Because this proposed policy is in direct conflict with the requirements of the Preservation Buffer Overlay District (Ch. 405, Article 8), staff assumes that, if proposed **EASP Policy 10.2.6.8** were adopted, it would override existing policy and regulations on this subject. The proposed policy does not address all relevant conservation resources that may be adjacent to EOMU edges.

Conservation (EA-CON) Land Use (proposed **EASP Policy 10.2.5**) would prohibit residential uses or transfer of density from conservation land use areas. Within EA-CON, the proposed EASP policies would permit silviculture and agriculture (employing State designated best management practices), as well as stormwater management facilities and road crossings (including up to four additional roadway crossings that will bisect the wildlife corridor). In addition, SR 20, SR 26, and CR 1474 may need to be expanded to meet the demands of the proposed development. The roadway expansions would impact property proposed to be designated conservation land use.

Proposed **EASP Policy 10.2.5.f.** states that four new road crossings of the EA-CON designated wildlife corridor would be planned and designed using 2013 Florida Department of Transportation Wildlife Crossing Guidelines. The applicant provided no policy language that would require the use of these guidelines. If followed, these guidelines suggest that no designs will be incorporated to accommodate the safe passage of wildlife through the corridor.

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

The proposed wildlife corridor along Lochloosa Creek does not meet the intended goals and strategies for the Critical Ecological Corridor Map because it lacks the design standards to be a regional corridor based on its location and limited size (width) and allowable activities (*i.e.*, additional road crossings; silviculture Best Management Practices allow for clear cutting of

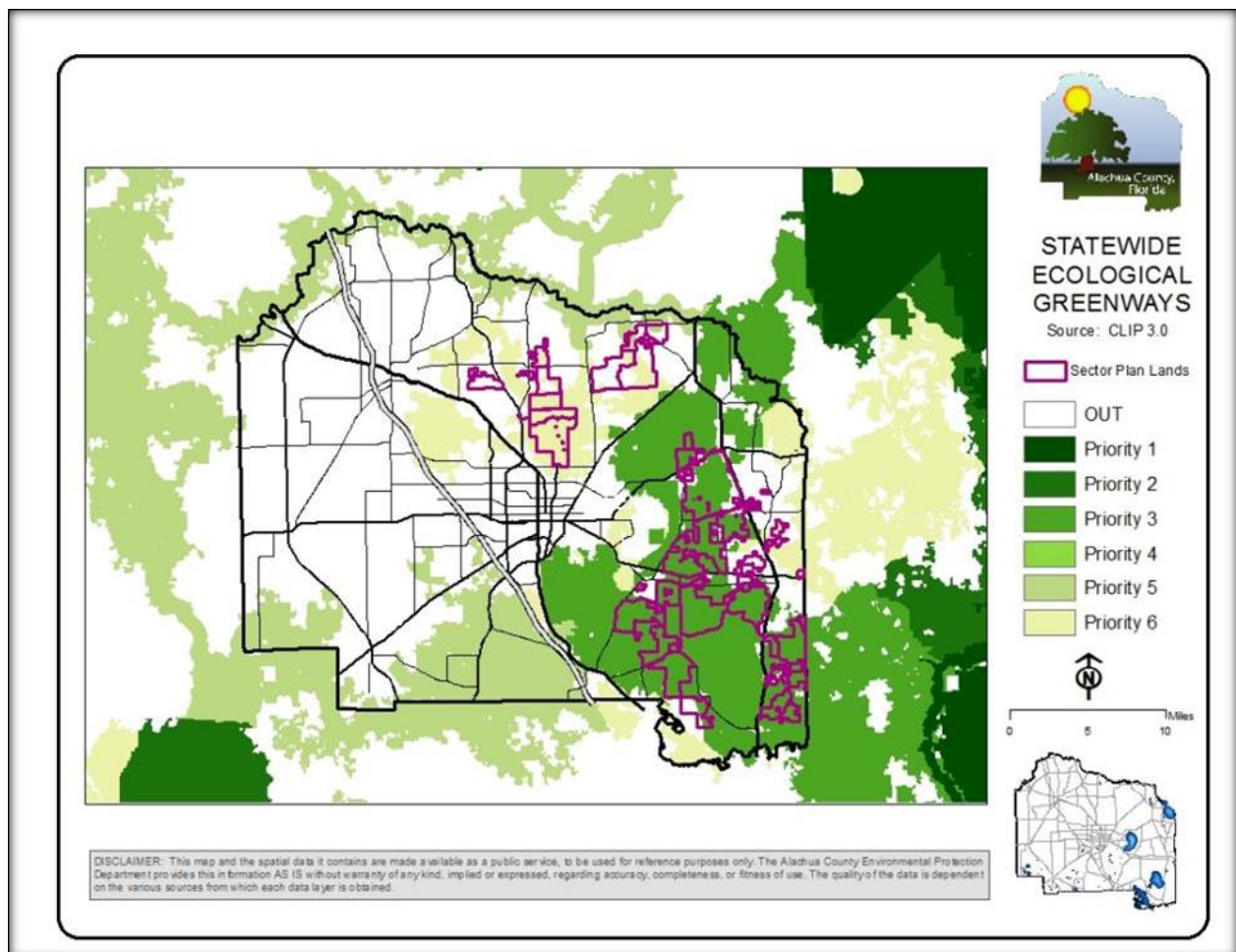
wetlands, which make up the majority of the corridor; and others). These concerns are further detailed below.



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

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

From the standpoint of providing functional habitat for all focal species, supporting ecological processes such as watershed functions and fire regimes, and facilitating adaptation to future environmental change, landscape-scale ecological connectivity is best achieved through the protection of large swaths of public and private rural land. Such broad ecological connections are often called landscape linkages, which can be defined as areas of habitat sufficiently wide and connected to both support populations of species of conservation interest and functional ecological processes while providing connectivity to other large blocks of habitat. Landscape



**MAP 13 FLORIDA ECOLOGICAL GREENWAYS NETWORK WITHIN THE EASP AREA**

linkages require designing the protection of broader, connected areas of conservation significance instead of narrower, linear corridors surrounded by intensive land uses. From this perspective, corridors or landscape linkages that are intended to serve all focal species and ecological functions over broad periods of time to facilitate both viable populations and adaptation to environmental change need to be on the scale of miles wide to achieve these functions.

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

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

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

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

Comprehensive plan policies must react to the data and analysis in an appropriate way and to the extent necessary, Sec. 163.3177(f), Fla. Stat. The proposed EASP policies would permit uses that are inconsistent with the results of an appropriate analysis of the available data.

#### **4. Listed Species and Listed Species Habitat Protection**

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



analyzed. Seventeen Federally- or State-listed animal species had a likelihood of occurrence based on the applicant's data and analysis.

### ***Local vs. Regionally Significant Resources***

A fundamental difference between the existing resource protection policies and these proposed EASP policies is that the proposed policies only recognizes regionally significant conservation resources while not recognizing or identifying local conservation resources (see proposed **EASP policy 10.1.1.1, 10.1.3, Obj. 10.3.**). Proposed **EASP Policy 10.4.1.2, Conservation Management Plans**, provides for the protection of species listed by FFWCC and USFWS. These proposed EASP policies are inconsistent with protection of local resources and protection of listed species as defined by the County, which includes S1 – S3 FNAI-listed species and their habitats (COSE Policy 3.1.1 and policies associated with COSE Obj. 4.9).

Proposed **EASP General Strategy 4** mentions 'Protect and retain regionally significant lands for conservation, habitat protection and wildlife connectivity.' Even though the additional conservation lands proposed by the applicant in northern and southeastern Alachua



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

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

County, which includes S1 – S3 FNAI-listed species and their habitats (COSE Policy 3.1.1 and policies associated with COSE Obj. 4.9).

## **5. Permanent Protection of Conservation Areas**

### ***a. Timing and Limitations of Permanent Protection***

Approximately 22,865 acres of lands included in the EASP are under existing conservation easements which removed development rights. Public agencies, most notably the St. John's River Water Management District, purchased these development rights using public funds between 1995 and 2009, and these lands are already recognized by the County as protected with a Preservation Land Use designation. The applicant is proposing to permanently remove the development rights from an additional 23,219 acres. The previous section outlined concerns related to the location and extent of the conservation corridor. This section details concerns related to the timing and management of all proposed conservation areas.

Proposed **EASP Policy 10.4.1.1**, Timing of Conservation Easements, states *"Permanent Preservation Areas. A conservation easement shall be provided **within 60 days of the effective date of a Detailed Special Area Plan (DSAP)** for land areas proposed for permanent preservation within all land use categories included in the DSAP."* The proposed EASP policy also states that other lands intended to be placed in conservation easements will be so placed at time of **site plan approval**.

This proposed EASP policy is not consistent with **Sec. 163.3245(3)(b)7, Fla. Stat.** which states that such easements **shall be effective before or concurrent with the effective date of the DSAP**.

### ***b. Management of Conservation Areas***

Proposed **EASP Policy 10.4.1.1** offers conservation easements over two types of areas, Permanent Preservation Areas and Permanent Conservation Areas. Permanent Preservation Areas include all wetlands within the DSAP protected under proposed **EASP Policy 10.4.2.1** intended for use as natural reserves or managed conservation lands for the preservation of natural resources in perpetuity. These Permanent Preservation Areas do not have a specific land use designation. For Permanent Conservation Areas, which will have a land use designation of EA-CON, a conservation easement will be provided at each individual site plan approval for any remaining conservation lands in the DSAP in direct proportion to the amount of development approved by the site plan. All conservation easements for either of these Areas will be transferred to the County or to a conservation organization after review and approval as to form and content.

However, several proposed EASP policies limit protection strategies within these conservation areas. Proposed **EASP Policy 10.2.5** specifically prohibits the County from applying additional conditions or restrictions on silviculture uses within EA-CON lands and allows for stormwater management and road crossings within these lands, including up to four additional crossing of Lochloosa Creek. Some of these areas arguably could remain in intensive industrial silviculture if the goal is not for habitat conservation, restoration, or enhancement. Others, like the EA-CON corridor, require more stringent protection and management strategies to remain viable and sustainable. The EA-CON corridor area along Lochloosa Creek, at a minimum, should be recognized as a Permanent Preservation Area (**EASP Policy 10.4.1.1.a.**) with management focused on the long-term success as a regionally-significant ecological corridor. Appropriate policies were not provided to accomplish this goal since EA-CON areas currently are recognized as Permanent Conservation Areas which, under proposed **EASP Policy 10.4.1.2.1.j.** prevents restrictions on silviculture and hunting. Intensive industrial silviculture land use in terms of “conservation” values have lower functional value (water quality degradation, impaired waters pollutant loading, surficial aquifer depletion due to evapotranspiration, wildlife habitat, sedimentation and erosion, flood storage displacement, and passive recreation opportunities) than lands managed for long-term forest habitat conservation.

Additionally, proposed EASP Policy 10.1.2.1 does not include specific provisions for protecting conservation easements from impacts of adjacent intensive land uses, including the designation of functional buffers adjacent to developed lands. There are no policies addressing wildfire mitigation associated with extensive urban-wildland interfaces that would be created by the proposed development.

Proposed **EASP Policy 10.4.1.2.3** states that *“...the management plans associated with the Conservation Easements shall be prepared by a group appointed by the County.”* Further, proposed **EASP Policies 10.4.1.2.2 and 10.4.1.2.4** state that “The management plan shall be submitted to the holders of the easement within twelve months of the transfer of the easement” and “Implementation of the management plan will then be funded by the owner or its successors in interest,” respectively. These proposed EASP policies bring up several questions and concerns:

1. Will an entity be willing to take an easement without having an approved management plan?
2. Will the County Commission agree to an easement without a finalized management plan, and if so can the Commission place conditions on the easement?



3. What if a management plan is not approved within 12 months of the easement transfer?
4. What if the easement holder disagrees with conditions in the management plan?
5. Does the reference to the 'owner' in **proposed EASP Policy 10.4.1.2.4** refer to the owner of the DSAP development area or the owner of the conservation area in the case that they are different.

Staff is still not clear how the DSAP development area owner/developer will be connected to the associated EA-CON and other conservation areas if they are not the owner of these lands as well. The applicant did not provide sufficient direction for implementation of these proposed policies at the DSAP stage in their proposed amendment. These proposed EASP policies are not an appropriate reaction to data and analysis. Comprehensive plan policies must react to the data and analysis in an appropriate way and to the extent necessary, Sec. 163.3177(f), Fla. Statute.



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

## D. Water Supply Data and Analysis

The St. Johns River Water Management District (SJRWMD) is currently in the process of finalizing its 2014 Water Supply Plan (SJRWMD, 2014). The draft Water Supply Plan includes planning level projected ranges of water demand through 2035, sustainable levels of fresh groundwater withdrawal and resulting deficits, and the methods and means to supply water to

all users in a sustainable manner. This Plan is conceived to address the entire Water Management District, which is divided into four regions. Plum Creek's Envision Alachua Sector Plan is within the SJRWMD Water Supply Planning Region 1 (see Map 15). Region 1 is bound by Georgia on the north, the Atlantic Ocean on the east, Region 2 on the south, and the Suwannee River Water Management District (SRWMD) on the west. This region also is included in the North Florida Regional Water Supply Partnership area, which also includes the eastern Suwannee River basin portion of the SRWMD. The Water Management Districts are currently collaborating in the development of a North Florida Regional Water Supply Plan and it is expected that the SJRWMD will update the Region 1 water supply section after the North Florida Regional Water Supply Plan is approved.

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

Under Florida Statute, section 163.3245(4)(b), has provisions relating to sector plans and regional water supply plans and consumptive use permitting by water management districts:

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

Section 163.3245 (3)(a)2., F.S. requires the long term master plan to include "a general identification of the water supplies needed and available sources of water, including water

resource development and water supply projects, and water conservation measures needed to meet the projected demand of the future land uses in the long-term master plan.”

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

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

The applicant provided projected water demand estimates for low, average and high water use in Exhibit 3-1 of the “Water Supply Data and Analysis Envision Alachua Sector Plan.” The total projected water demand is for the fifty year plan, based on projected land use and corresponding ranges of water use. According to the applicant’s estimates, the high water demand estimate reflects water usage that is typical of existing communities in Alachua County that do not strictly implement water conversation principles. Low water demand reflects communities that implement water conservation principles. All residential water use assumes no potable water will be used for irrigation. In order to meet the projected low water demands, the applicant has proposed a number of water conservation principles outlined in proposed **EASP Objective 10.4.3.1**. The applicant did not provide data and analysis comparing the EASP water demand under current land use and Comprehensive Plan policies with their proposed land use and Comprehensive Plan policy changes. This data and analysis is appropriate to determine how much additional water demand would be created by the proposed amendment over the current projected water use for the property.

EXHIBIT 3-1  
Projected Potable Water Demand

Land Use	Unit	Water Use, gal/unit-d			Number of Units	Total Usage, mgd		
		Low	Medium	High		Low	Medium	High
Advanced Manufacturing <sup>a</sup>	Acres	1,208	1,848	3,636	918 <sup>f</sup>	1.1	1.7	3.3
R&D, Office Facilities <sup>e</sup>	Square feet	0.02	0.04	0.05	6,000,000 <sup>f</sup>	0.14	0.26	0.32
Retail <sup>h</sup>	Square feet	0.018	0.02	0.03	1,000,000 <sup>f</sup>	0.018	0.022	0.033
Residential <sup>a</sup>	Capita	40	78	95	26,250 <sup>a</sup>	1.05	2.04	2.5
Schools <sup>b</sup>								
Elementary <sup>c</sup>	Student	10	15	20	1,670	0.017	0.025	0.033
Middle <sup>d</sup>	Student	10	20	30	840	0.008	0.017	0.025
High <sup>d</sup>	Student	10	20	30	1,176	0.012	0.024	0.035
<b>Total Water Demand</b>						<b>2.35</b>	<b>4.09</b>	<b>6.28</b>

<sup>a</sup> Assumes 2.5 people per household. Low water use is from *Wastewater Engineering – Treatment, Disposal, and Reuse* (Metcalf & Eddy, Inc., Third Edition, 1991). Average water use is based on an average wastewater flow of 70 gpcd and 90% capture of water flows. High water use from Envision Alachua Water Consumption Baselines, assumes 90<sup>th</sup> percentile of non-irrigated residence.

<sup>b</sup> Number of students assumes all 10,500 housing units are single family. Alachua County student generation calculation form (School Board of Alachua County 2009 – 2010 Five year District Facilities Plan) used to estimate the number of students.

<sup>c</sup> Assumes school with cafeteria *Wastewater Engineering – Treatment, Disposal, and Reuse* (Metcalf & Eddy, Inc., Third Edition, 1991).

<sup>d</sup> Assumes school with cafeteria, gym and showers *Wastewater Engineering – Treatment, Disposal, and Reuse* (Metcalf & Eddy, Inc., Third Edition, 1991).

<sup>e</sup> The following industry and domestic flows are assumed for low, average and high water use, respectively: 1,000 gal/ac-d and 8 gpcd, 1,500 gal/ac-d and 15 gpcd, 3,000 gal/ac-d and 25 gpcd *Wastewater Engineering – Treatment, Disposal, and Reuse* (Metcalf & Eddy, Inc., Fourth Edition, 2003). All water use estimates assume 10,000 employees and wastewater flow accounts for 90% of water flows.

<sup>f</sup> Information provided by Plum Creek. Advanced manufacturing acres based on 8 million sq ft and a 20% floor-area-ratio.

<sup>g</sup> The following is assumed for low, average and high water use, respectively: 7 gpcd, 13 gpcd, 16 gpcd *Wastewater Engineering – Treatment, Disposal, and Reuse* (Metcalf & Eddy, Inc., Third Edition, 1991). All water use estimates assume 18,000 employees.

<sup>h</sup> The following is assumed for low, average and high water use, respectively: 8 gpcd, 10 gpcd, 15 gpcd *Wastewater Engineering – Treatment, Disposal, and Reuse* (Metcalf & Eddy, Inc., Third Edition, 1991). All water use estimates assume 2,000 employees.

The applicant's data and analysis estimates residential water use ranging from 40 (low) to 95 (high) gallons per capita per day. The USGS Water Withdrawals, Use, and Trends in Florida, 2010 report (Marella 2014) reports the 2010 residential public-supply per capita use in Alachua County as 70 gallons per person per day. This value includes the use of potable water for irrigation. Assuming up to 50% of residential water use occurs outdoors, residential water use in the region in 2010 was roughly 35 gallons per person per day, excluding potable irrigation. This calculated value is consistent with the estimated residential low water use and it also indicates that the primary means to achieving the low estimate would be by limiting the amount of potable water used for irrigation, specifically through the adoption of the proposed **EASP Policy 10.4.3.1 Water Supply Strategy**. If potable water is used for establishing vegetation and during drought, the residential water use could exceed the estimated values in their forecasted water supply needs.

The applicant's data and analysis projects that over 50% of the water demand in the EASP will be from industrial and commercial land uses currently not allowed under the existing Comprehensive Plan (advanced manufacturing, research and development, office facilities, retail) and also states that the advanced manufacturing water use values are based on typical usage for no or little wet-process-type industries. The proposed amendments do not include specific policy language limiting the allowed industrial uses to only "no or little wet-process-type industries" or industries capable of utilizing large amounts of reclaimed water as outlined in proposed **EASP Policy 10.4.3.1 Water Supply Strategy**.

The applicant's data and analysis estimates a Total Water Demand range of 2.35 – 6.28 MGD. In order to achieve the low end of the proposed Total Water Demand (2.35 MGD) and to minimize the impacts of the EASP, the applicant is relying on the adoption by the County of the Water Conservation principles outlined in proposed **Objective 10.4.3**. However, the Water Management Districts have exclusive and preemptive authority for the regulation of water consumptive use permit under Sec. 373.217, Fla. Statute. The County may not be able to legally adopt some of the policies proposed by the applicant and without the adoption of these provisions it is not feasible to achieve the projected low water demand estimated by the applicant.

## **2. Plum Creek's Envision Alachua Sector Plan Alternative Water Supplies**

Section 5 of the "Water Supply Data and Analysis Envision Alachua Sector Plan" analyses potential alternative water supply options in order to minimize the impacts of the EASP. The applicant's analysis briefly and generically evaluates different options including indirect and direct potable reuse, surface water, seawater/brackish groundwater and the Lower Floridan aquifer as potential alternative water supply options and concludes that the use of the Lower Floridan is an alternative and reasonable water supply for this region. However, the report acknowledges the need for additional data in order to better define the feasibility of this option. Staff notes that the separation and degree of confinement between the Upper and Lower Floridan aquifer in Alachua County is uncertain and thus the Lower Floridan aquifer may not be an alternative water supply source in this area.

## **E. Conclusions of Environmental Analysis**

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

COSE Objective 4.5 deals with protecting *"...the quality and quantity of groundwater and springs resources to ensure long-term public health and safety, potable water supplies from surficial, intermediate, and Florida aquifers, adequate flow to springs, and the ecological integrity of natural resources."* Also, as stated in COSE Policy 4.5.10, *"Withdrawals of ground water have the potential to result in adverse impacts on potable water supply and natural ecosystems. Development shall occur only when adequate water supplies are concurrently*

*available to serve such development without adversely affecting local or regional water sources or the natural ecosystem, as determined in accordance with local and state law.”*

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

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

## **V. Transportation Analysis**

### **A. Summary of Transportation Analysis**

The coordination of natural resources, land use and transportation planning is a hallmark of the adopted Alachua County Comprehensive Plan. The applicant has provided a transportation study of the potential transportation impacts of the Envision Alachua Sector Plan (EASP) utilizing the existing Gainesville Metropolitan Area Countywide Transportation Model. The applicant's transportation study demonstrates that many area roadways will not meet their adopted levels of service if the development is constructed.

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

The addition of capital improvements to the transportation system proposed in the EASP amendment would not be sufficient to mitigate the impacts of the proposed development. Adoption of the proposed amendment would undermine the mobility goals of infill and redevelopment of existing municipalities and the Urban Cluster as expressed within the structure of the Comprehensive Plan.

### **B. Overview of County Transportation Planning**

#### **1. Existing Transportation Infrastructure**

In order to understand how the EASP proposes to address mobility, it is critical to become familiar with the existing roadway transportation infrastructure in the vicinity of the EA-EOMU. Existing roadway transportation infrastructure in the vicinity of the EASP falls, generally, into three categories. The first is State-maintained roadways. The second is major County roads. The final includes other County maintained roadways. It should be noted that all roadways discussed in this section are designed as rural sections that do not anticipate urban type uses with the exception of roadways within the City of Hawthorne. Each of the facilities discussed in this section of the Report is included in Table 6 with a list of pertinent data. Each facility is also identified on Map 16. For the purposes of this section, the EA-EOMU project area is generally defined to include the area between Newnan's Lake on the west, US 301 on the east, County

Road 2082 on the south and State Road 26 on the north. The segments identified in Table 6 represent those segments that are generally within the vicinity of the EASP. However, the amendment, as proposed, would impact additional segments of State and county-maintained facilities throughout Alachua County and adjacent counties (namely, Putnam, Marion and Bradford) as illustrated in Map 17.

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

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

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





**FIGURE 5. CR 234 NEAR WINDSOR RURAL CLUSTER**



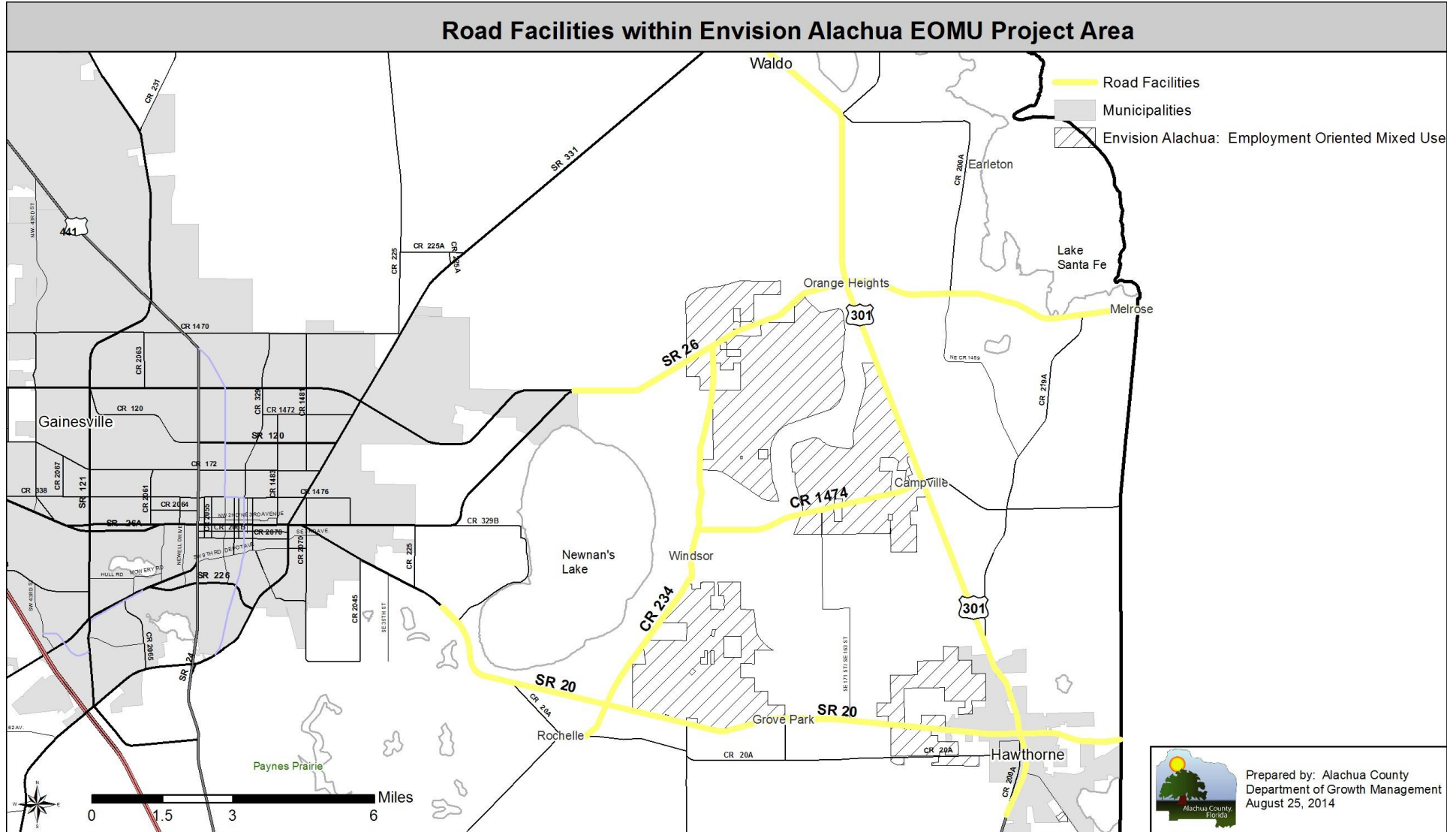
**FIGURE 6. SOUTHEAST 24TH AVENUE IN THE PROJECT AREA**

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

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

TABLE 6. EXISTING ROADWAY FACILITIES IN ENVISION ALACHUA CONTEXT AREA

<b>Roadway</b>				
<b>Description</b>	<b>Design</b>	<b>Maximum Service Volume (AADT)</b>	<b>Current Volume (Year)</b>	<b>2035 Volume</b>
<b>State Road 20 / Hawthorne Rd</b>				
SE 51 <sup>st</sup> to CR 2082W	4-lane Divided	49,600	8,700 (2013)	11,200 (FDOT LOS Report) 18,800 (LRTP Model)
CR 2082W to CR 325	4-lane Divided	49,600 (FDOT) 35,300 (Alachua County)	8,000 (2013)	10,400 (FDOT LOS Report) 18,200 (LRTP Model)
CR 325 to SE 205 <sup>th</sup> St	4-lane Divided	49,600 (FDOT) 35,300 (Alachua County)	7,200 (2013)	9,700 (FDOT LOS Report) 15,700 (LRTP Model)
SE 205 <sup>th</sup> St to US 301	4-lane Divided	29,300	7,200 (2013)	9,000 (FDOT LOS Report) 15,400 (LRTP Model)
<b>US 301</b>				
SE 75 <sup>th</sup> Ave to SR 20	4-Lane Divided	29,300	11,100 (2013)	13,500 (FDOT LOS Report) 16,800 (LRTP Model)
SR 20 to SE 233 <sup>rd</sup> St	4-Lane Divided	29,300	10,400 (2013)	12,900 (FDOT LOS Report) 18,600 (LRTP Model)
SE 233 <sup>rd</sup> St to SE 41 <sup>st</sup> Ln	4-Lane Divided	29,300	10,400 (2013)	12,900 (FDOT LOS Report) 18,800 (LRTP Model)
SE 41 <sup>st</sup> Ln to SR 26	4-Lane Divided	40,300 (FDOT) 25,700 (Alachua County)	10,400 (2013)	12,900 (FDOT LOS Report) 16,600 (LRTP Model)
SR 26 to NE 136 <sup>th</sup> Ave	4-Lane Divided	40,300 (FDOT) 25,700 (Alachua County)	9,700 (2013)	11,200 (FDOT LOS Report) 20,100 (LRTP Model)
<b>State Road 26</b>				
From SR 222 to US 301	2-Lane Undivided	8,400 (FDOT) 14,300 (Alachua County)	9,400 (2013)	11,000 (FDOT LOS Report) 10,200 (LRTP Model)
US 301 to Putnam County Line	2-Lane Undivided	8,400 (FDOT) 14,300 (Alachua County)	8,800 (2013)	10,300 (FDOT LOS Report) 10,400 (LRTP Model)
<b>County Road 234</b>				
CR 2082 to SR 20	2-Lane Undivided	8,400	597 (2014)	2,000 (LRTP Model)
SR 20 to CR 1474	2-Lane Undivided	8,400	851 (2014)	1,300 (LRTP Model)
CR 1474 to SR 26	2-Lane Undivided	8,400	818 (2014)	900 (LRTP Model)
<b>County Road 1474</b>				
CR 234 to US 301	2-Lane Undivided	8,400	441 (2014)	200 (LRTP Model)



Prepared by: Alachua County  
Department of Growth Management  
August 25, 2014

## **2. Background: Alachua County Transportation Planning Structure**

The Transportation Mobility Element of the Alachua County Comprehensive Plan is structured around the implementation of multimodal transportation systems within the Urban Cluster and State-maintained regional facilities, on the one hand, and the County-maintained rural roadways outside of the Urban Cluster, on the other.

## **3. Transportation Planning Inside the Urban Cluster**

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

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

## **4. Transportation Planning Outside the Urban Cluster**

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

### ***OBJECTIVE 1.2 - Transportation Management Outside of Urban Cluster Mobility Areas***

*To protect and support agricultural activities, preserve the character of rural communities and encourage development in areas where infrastructure can be provided in a financially feasible*

manner, developments outside the Urban Cluster as identified in the Comprehensive Plan shall be required to mitigate directly impacted roadways and impacts to roadways within the urban cluster.

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

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

*\* Strategic Intermodal System, Florida Department of Transportation*

*\*\* Four or more through lanes*

*\*\*\* LOS D for:*

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

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

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

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

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

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

## **C. Sector Planning and Comprehensive Transportation Planning Requirements**

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

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

In addition to this statutory requirement, amendments to the Future Land Use Element of the Comprehensive Plan outside the Urban Cluster that would increase the demands on the existing transportation system must include transportation facilities and services to provide mobility to and within the proposed uses. **Transportation Mobility Element Policies 1.2.5 and 1.2.6** deal directly with this requirement:

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

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

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

## **1. Envision Alachua Transportation Study Methodology**

Staff and the applicant reached agreement on the transportation study methodology through a methodology letter and a series of meetings. The transportation study was submitted as part of the data and analysis of the EASP application. The analysis of the transportation components of the Envision Alachua Sector Plan are related to the Employment Oriented Mixed Use Land Use category (EA-EOMU). This is due to the fact that the impacts of the development generated within the EA-EOMU category would be the largest deviation from the currently adopted Future Land Use categories for the subject properties.

### *(a) Study Area*

The study area for the transportation study included regionally-significant and major County roadways where the assigned project trips exceed five percent (5%) of the daily generalized service volume at the roadway's adopted level of service (LOS). This is a standard service area derived from the FDOT Transportation Site Impact Handbook and is an industry standard used for reviewing developments which are likely to have regional transportation impacts.

### *(b) Horizon Year*



The horizon year for the Sector Plan Comprehensive Plan amendment is 2065. Alachua County has a transportation demand model that was last validated in 2008 for use in the Metropolitan Planning Organization's 2035 Long Range Transportation Plan. This is the most up to date transportation model for Alachua County and best tool available to model the impacts of the development called for in the proposed Sector Plan. The EASP transportation study used the 2035 Alachua County Cost Feasible scenario and network from the Alachua County 2035 transportation demand model. In order to provide a breakdown of near term and longer term impacts, the applicant provided analysis results for a projected 2035 partial buildout (40%) and 2065 full buildout of the EASP development program.

## 2. Envision Alachua Transportation Study Results

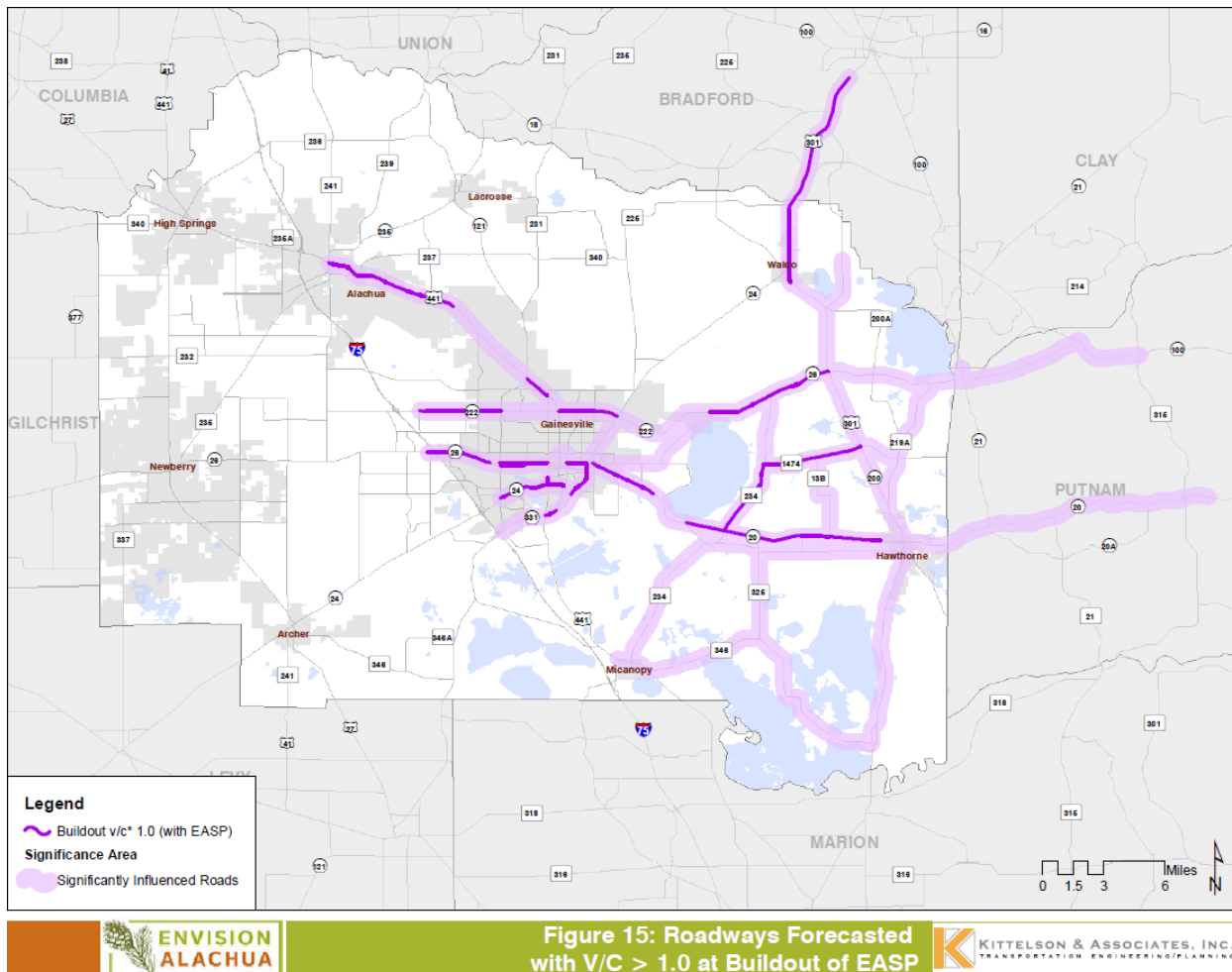
The applicant's transportation study provides the bulk of the data and analysis regarding the potential impacts of EASP amendment. The future roadway conditions are detailed in the study. Staff reviewed the study results in light of the **TME Policy 1.2.5** and **1.2.6** described above. There are multiple roadways that would fall below their adopted level of service with the addition of project traffic. This is true both in the horizon year of the 2035 model and to a greater extent in the projected buildout year of the 50 year Envision Alachua Sector Plan. The roadway segments projected to fail are detailed in the tables below with the segments which fail due specifically to project traffic (**highlighted** for emphasis).

Roadway Segment		2035 Adopted Number of Lanes	Generalized Svc. Vol. at Adopted LOS	2035 without EASP		2035 with EASP		Buildout with EASP	
From	To			AADT	# Add'l Lanes to Meet Std.	AADT	# Add'l Lanes to Meet Std.	AADT	# Add'l Lanes to Meet Std.
<b>SR 20</b>									
SR 235	CR 25A (South)	4	40,700	40,959	2	41,692	2	42,792	2
SR 121	US 441/SR 20	4	39,800	53,483	2	54,269	2	55,448	2
Main St/CR 329	SR 24	4	33,800	29,963	--	32,213	--	35,587	2
SR 26	SE 51st	4	39,800	25,300	--	34,740	--	48,900	2
CR 2082W	CR 325	4	25,700	17,368	--	29,426	2	47,514	2
CR 325	205th St	4	25,700	15,373	--	22,319	--	32,738	2
<b>SR 26</b>									
NW 76th Blvd	I-75	6	23,300	64,873	2	64,370	2	63,615	2
I-75	NW 8th Ave	6	59,900	71,282	2	71,256	2	71,218	2
NW 8th Ave	SR 26A	4	33,800	54,225	4	53,542	4	52,518	4
SR 26A	SR 121/NW 34th St	4	33,800	34,741	2	33,284	--	31,100	--
SR 121/NW 34th St	Gale Lemerand Dr	4	32,110	40,808	2	40,828	2	40,857	2
Gale Lemerand Dr	US 441/W 13th St	4	33,800	37,504	2	37,278	2	36,938	2
SR 222	US 301	2	14,300	9,767	--	14,644	2	21,961	2
<b>US 301/SR 200</b>									
NE 136th Ave	NE 160th Ave	4	25,900	34,744	2	35,069	2	35,556	2
NE 160th Ave	N City Limit (800' N of NE 177th Pl)	4	25,900	34,328	2	34,631	2	35,084	2
N City Limit (800' N of NE 177th Pl)	Bradford Co. Line	4	25,900	33,502	2	34,013	2	34,781	2
Bradford Co. Line	2000' S of 146th St.	4	25,700	45,650	2	46,347	2	47,393	2

Roadway Segment		2035 Adopted Number of Lanes	Generalized Svc. Vol. at Adopted LOS	2035 without EASP		2035 with EASP		Buildout with EASP	
From	To			AADT	# Add'l Lanes to Meet Std.	AADT	# Add'l Lanes to Meet Std.	AADT	# Add'l Lanes to Meet Std.
<b>SR 222</b>									
NW 83rd St	NW 43rd St	4	39,800	47,506	2	48,051	2	48,869	2
NW 43rd St	SR 121/NW 34th St	4	39,800	42,319	2	42,605	2	43,035	2
SR 20	SR 24	4	39,800	38,054	--	40,126	2	43,235	2
<b>SR 24</b>									
SR 121/NW 34th St	SR 226/SW 16th Ave	6	50,900	80,415	2	81,041	2	81,980	2
<b>SR 226/SR 24A</b>									
SR 24	US 441/W 13th St	4	33,800	37,056	2	37,139	2	37,263	2
<b>US 441/SR 25</b>									
SR 226	SR 24	4	32,110	32,629	2	32,304	2	31,817	--
<b>SR 26A</b>									
SR 121	SR 26	2	15,600	20,678	2	20,874	2	21,168	2
<b>SR 331</b>									
US 441	SR 329/Main St	4	39,800	39,541	--	40,337	2	41,531	2
SR 226	SR 26	4	33,800	29,123	--	32,325	--	37,129	2
<b>CR 234</b>									
SR 20	CR 1474	2	8,400	1,383	--	4,514	--	9,211	2
<b>CR 1474</b>									
CR 234	US 301/SR 200	2	8,400	688	--	3,974	--	8,903	2

The potential failing roadway segments are shown geographically in Map 17.





The applicant's transportation consultant provided an analysis section after a discussion of the study results which proposed policy responses to these deficiencies. The proposed policy responses are discussed below.

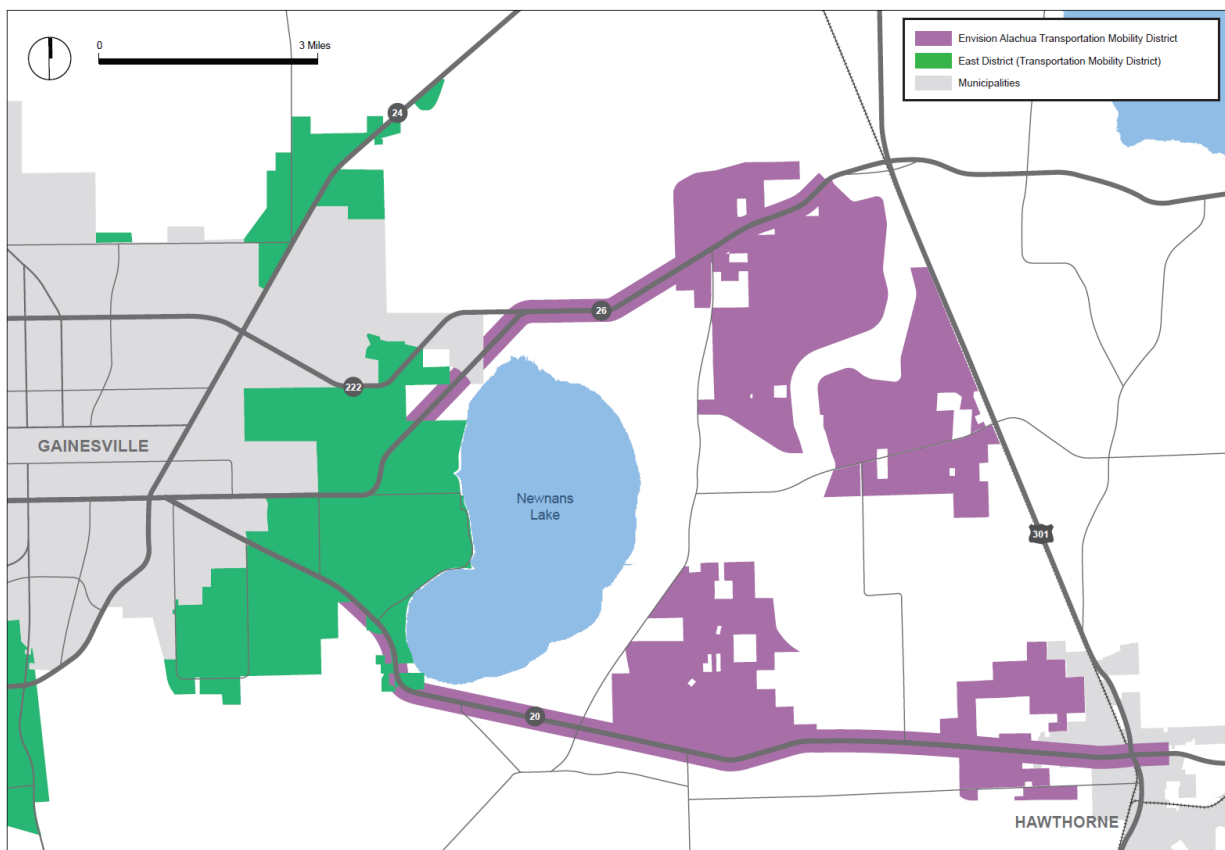
### 3. Envision Alachua Transportation Mobility and Capital Improvements Policy Approach

#### (a) Level of Service

In response to the transportation study results that show multiple roadways failing to meet their adopted level of service with the adoption of project trips, the EASP proposes amendments to the Transportation Mobility Element of the Comprehensive Plan. Instead of proposing to widen roadways to add capacity to meet the adopted level of service, these amendments instead propose to designate an area corresponding to the proposed EA-EOMU land use category and portions of State Roads 20 and 26 as a Transportation Mobility District. This Transportation Mobility District modeled after the Transportation Mobility Districts associated with the Urban Cluster in the adopted Comprehensive Plan.

The primary innovation of the Mobility District concept, as currently articulated in the Comprehensive Plan, was its utilization of multimodal level of service measures. As an element of these multimodal levels of service, Transportation Mobility Districts utilize an areawide level of service for automobiles. Areawide level of service is a valid concept when there are parallel transportation facilities that can serve transportation demands, as there are existing and planned within the Urban Cluster. This gives travelers options to utilize parallel facilities when a corridor reaches congestion levels that are unacceptable to the traveler.

The areawide level of service concept has two primary issues when applied in the EASP. One issue is that internal to the EA-EOMU land use the need for collector roadway corridors spaced closely enough to provide a gridded roadway network conflicts with the ecological protection goals of the Comprehensive Plan. Depending on the final design of the development area, the construction of a functional gridded roadway network would produce significant disruption to ecological corridors and have impacts on the hydrology of the area. These impacts are discussed more fully **Section IV Natural Resource Protection Analysis** of this report. Secondly, the areawide level of service concept becomes problematic when applied to the major arterials that provide access to and from the EA-EOMU and the remainder of the community. A major issue with this proposal is that the applicant has proposed to include the segments of State Road 20 and State Road 26 inside the Mobility District per Map 18.



Data Sources: Alachua County Transportation Mobility Districts and Transportation Concurrency Exception Areas (Alachua County Department of Growth Management), Alachua County GIS, Plum Creek | Updated: 11-2013



A community discussion on the future of East County  
CONVENED BY PLUM CREEK

Proposed Map 11.A of the Transportation Map Series  
December 2013

**MAP 18. ENVISION ALACHUA MOBILITY DISTRICT**

Due to the presence of Newnan's Lake and other environmental constraints there is no potential for parallel facilities that can relieve State Roads 20 and 26 for the primary travel demand pattern between Gainesville and the EA-EOMU area. The transportation study indicates that over 50% of the external project trips are using these two state facilities for travel between the EA-EOMU and Gainesville. These two facilities are approximately 7 miles apart at County Road 234, the western boundary of the EA-EOMU. To truly provide for adequate parallel facilities to serve an urbanized population, parallel facilities would need to be spaced much more closely, on the order of one mile. This is not practical in the EASP portion of eastern Alachua County due to the presence of the natural boundary created by Newnan's Lake.

County Road 234 between State Road 20 and County Road 1474 as well as County Road 1474 between County Road 234 and US 301 are not entirely contained within the EASP proposed EA Mobility District. It is unclear why they were not included by the applicant, but, in either case, the applicant is not proposing significant capacity enhancements on these County maintained facilities which are both projected not to meet their adopted levels of service due to the EASP project trips.

*(b)* EASP Impacts and Capital Improvement Planning

The applicable Sector Plan Statute **Section 163.3245(3)a3, F.S.** and **Transportation Mobility Element Policies 1.2.5** and **1.2.6** require the identification of transportation facilities needed to serve the proposed development program in conjunction with the Future Land Use amendments that will produce the transportation demand. Additionally, funding sources need to be identified in order to apportion the costs of the needed infrastructure and any necessary transit services among the proposed development types.

There are multiple roadway segments which would be projected to not meet their adopted levels of service due to the addition of the EASP trips resulting from the EASP amendment. A subset of those roadway segments are those that fail with the addition of project trips and where project trips make up a significant portion of the maximum service volume of the roadway. The applicant has proposed **EASP Transportation Mobility Element Policy 1.10.11** in an attempt to address impacts on these roadways.

### **Policy 1.10.11 Transportation Facility Improvements**

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

Roadway Segment	Description		Unit Measure	Quantity		Cost Estimate	
	2035 <sup>1</sup>	Build-out		2035 <sup>1</sup>	Build-out	2035 <sup>1</sup>	Build-out
Transportation <sup>2, 3</sup> (potential funding sources also include MMTD fees, gas tax revenues, etc.)							
CR 234 (SR 20 to CR 1474)	None	Traffic calming	various	-	TBD	\$0	TBD
SR 20 (SR 329 to US 301)	Extend Bus Service	Extend Bus Service	N/A	Extend Bus Service	-	TBD	TBD
SR 20 (CR 2082 to CR 235)	Reclassify to transitioning or urban	None	miles	3.3	-	\$0	\$0
SR 331 (US 441 to SR 329) & (CR 234 to US 301)	None	operational improvements <sup>5</sup>	various	-	TBD	\$0	TBD
CR 1474 (CR 234 to US 301)	None	operational improvements <sup>5</sup>	various	-	TBD	\$0	TBD

1. The year 2035 represents the project's development at 40% of complete build-out.

2. Improvements are identified for segments where the forecasted volumes with the EASP are higher than the generalized service volumes and at least 5% higher than the forecasted volumes in 2035 without the EASP.

3. Improvements may be considered to maximize roadway capacity *without* adding additional lanes. These improvements may include Transportation System Management (TSM) or Transportation Demand Management (TDM) techniques.

There is no accompanying data and analysis in the application that demonstrates that the proposed improvements would be sufficient to meet the projected transportation demand. The policy calls for “operational improvements” on many major transportation facilities as opposed to adding additional lanes. Operational improvements, which typically consist of turn lane installation, signalization and other intersection and access management improvements, would be required for any development approval and would not in and of themselves mitigate the impacts of project traffic. The proposed EASP policy calls for an extension of bus service along State Road 20 but there is no data or analysis presented in the application as to when or how often this bus service would operate or to what extent this service would mitigate the significant projected congestion on this roadway.

Staff also has a particular concern for the unmitigated impacts on SR 26 between US 301 and State Road 222. The applicant's transportation study illustrates that this roadway would be projected to operate at 153% of its capacity at buildout of the EASP. This would necessitate widening of this particular facility to 4 lanes to meet the adopted level of service. Four-laning of State Road 26 is not included in the EASP amendment and therefore no data and analysis is provided as to the projected cost of this amendment or potential environmental impacts that would be associated with it.

The applicant's transportation study demonstrates that the proposed EASP comprehensive plan amendment would have significant and adverse impacts on the regional transportation system. Proposed **EASP TME Policy 1.10.11** and the associated table are not a sufficient policy response to the congestion and level of service deficiencies detailed in the transportation study.

*(c) County Responsibilities LOS Mitigation*

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

**Policy 1.10.9**      **LOS Mitigation**

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

The TME has an existing similar policy for the Transportation Mobility Districts of the Urban Cluster, **TME Policy 1.1.6.6**. In the adopted Comprehensive Plan this policy plays the role of a "failsafe" since adequate capacity projects were added to the Capital Improvements Element coincident with the adoption of the Transportation Mobility District concept. Since the applicant is not proposing adequate facilities to mitigate the impacts of the proposed development, the proposed policy governing the EA area would have negative fiscal impacts on the County, because the County would be required by its newly adopted policies to fund improvements to mitigate the impacts of the applicant's development.

*(d) Transportation Mobility Mitigation and Funding*

Although the EASP application does not call for any significant investment in the regional transportation system as detailed above, the applicant has proposed an EA-Mobility Fee in **EASP TME Policy 1.10.3** and a mechanism for Mobility Fee credit in **EASP TME Policy 1.10.4**.

**Policy 1.10.3      EA-Mobility Fee**

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

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

**Policy 1.10.4      EA Mobility Fee Credit**

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

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

The County's existing MMTM relies on the latter of those two options. Outside of certain undefined operational improvements, the proposed amendment has only called for an extension of bus service into the EASP area as expressed in proposed EASP **Transportation**

**Mobility Element Policy 1.10.11.** The frequency of bus service has not been proposed and it is unclear how or what percentage of the operations of the transit would be funded through the proposed Mobility Fee. A basis for the proposed Mobility Fee is not detailed sufficiently in the EASP amendment so the amount of the fee cannot be determined. As previously discussed, EASP traffic would be consuming available capacity in the area roadway network which would lead to travel demands and necessitate significant capacity expansions in the regional roadway network. The key to the success of any Mobility Fee concept is first planning for the transportation projects necessary to mitigate the impacts of new growth and then fairly apportioning the cost to the constituents of the new development. The proposed EASP policy framework does not adequately provide this structure.

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

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

**Policy 1.10.6**      **SIS Facilities Levels of Service**

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

There is no data and analysis in the application detailing how the mitigation measures in the existing published SIS Mitigation Report would translate to the impacts associated with the Envision Alachua Sector Plan Comprehensive Plan amendment. As discussed previously, it is not practical to construct parallel facilities to one of the major SIS facilities, State Road 20. The construction of parallel facilities was a key factor staff negotiated with the Florida Department of Transportation when the County adopted the existing SIS mitigation framework.

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



#### **Policy 1.10.7      Transportation – SR 20 Transition to an Urban Facility**

The County recognizes that the EASP will develop in an urban development form along SR 20 and will work with FDOT to transition the SIS facility designation from a rural facility to an urban facility consistent with the timing of that urban development. When appropriate, the existing SIS Mitigation Plan (Alachua County Growth Management Department January 26, 2010) may be amended, in consultation with FDOT, to reflect the change in land use character along SR20.

State Road 20 provides the primary east-west connection between Gainesville and Palatka and is a leg of the connection between Gainesville and the east coast. State Road 20 is a 65 MPH four lane divided highway. FDOT has a statutory mandate to protect the function of the SIS to provide for the movement of people and freight. Transitioning to an urban facility would decrease the emphasis on vehicular and freight throughput and would have the practical impact of increasing travel times on this major facility due to the increased levels of congestion due to EASP traffic.

### **D.      Other Transportation Policy Issues**

#### **1.      Urban Cluster and Consistency with Comprehensive Plan structure**

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

#### ***PRINCIPLE 3***

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

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

Recently approved development applications in the Celebration Pointe and Santa Fe Village TODs and the pending application of for the Springhills TOD contain considerable residential and non-residential development potential within the Urban Cluster that will be served by rapid



transit funded by the development through the MMTM and Transportation Improvement District programs.

## **2. Suitability of EASP Property for Urban Development**

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

## **3. Impacts on Other Regionally Significant Transportation Infrastructure**

**Section 163.3245(3)a 4, F.S.** also requires that Sector Plans identify “other regionally significant public facilities necessary to support the future land uses.” The North Central Florida Strategic Regional Policy Plan identifies, in Chapter V of the plan, regionally significant transportation infrastructure. In addition to all of the State Roads and US Highways previously mentioned, the Strategic Regional Policy Plan also identified the Gainesville Regional Airport, a Strategic Intermodal System facility, and the CSX rail line running along US 301 from the Bradford County Line to the Marion County Line as regionally significant transportation facilities. The applicant provided no data and analysis about the potential impacts of the Envision Alachua Sector Plan on these facilities.

## **E. Conclusions of Transportation Analysis**

Staff’s analysis of the proposed Envision Alachua Sector Plan and associated Comprehensive Plan Amendment above can be distilled into the following general conclusions:

1. The proposed amendment’s application of an areawide level of service is inappropriate due to physical and environmental constraints of the land making the construction of parallel transportation capacity impractical and ecologically inadvisable.
2. The proposed amendment would cause multiple elements of the transportation network to fall below their adopted levels of service.
3. The proposed amendment does not propose adequate transportation infrastructure necessary to support the Future Land Uses proposed.
4. The proposed amendment would have negative fiscal impacts on the County due to the need to provide for and maintain new capital transportation infrastructure and transit service to meet community level of service goals.

5. There is not an adequate basis in the proposed amendment for the implementation of a Mobility Fee.
6. The proposed amendment is generally inconsistent with **Transportation Mobility Element Principle 3** and its associated policies. The proposed amendment would have negative impacts on higher density infill and redevelopment within existing communities which are more readily served by transit, walking and biking.
7. The EA-EOMU is generally unsuitable for construction of an urban gridded multimodal transportation network due to its location and restrictions imposed upon development impacting sensitive natural resources.

## **VI. Public Facilities and Services Analysis**

### **A. Summary of Public Facilities and Services Analysis**

The estimated public facility costs, including a delineation of when facilities will be needed, the general location of the facilities, and projected revenue sources to fund the facilities are required by State Statute (Section 163.3177(3)(a), F.S.) at the Comprehensive Plan Amendment stage.

There are no policies being proposed with this amendment that specify the needed public facilities, the cost or the timing. These proposed policies are, therefore, not consistent with requirements in the County's Comprehensive Plan and Florida Statutes Section 163.3177 for Comprehensive plan amendments. Public facilities and infrastructure needed as a result of a proposed development should be identified, including timing and funding, in the Capital Improvements Element at the time of the proposed Comprehensive Plan amendment in order to be able to assess the true impacts of the proposed future urban land uses in the EASP on public facility needs prior to designating those uses on the Future Land Use Map that would greatly increase the allowable densities and add new commercial and industrial uses to this rural area.

### **B. General Public Facilities and Services Analysis**

#### **1. Proposed Policies**

Proposed EASP Policy 10.1.4 Development Program lists the maximum development program of 10,500 residential units and 15.5 million square feet of non-residential uses and includes a note that facilities to serve the community including schools, government services, and utilities shall be provided as needed. There is a Public Facilities Needs analysis included with the application that analyzes water and sewer, solid waste, schools, and recreation needs. This analysis identifies deficiencies in water and sewer (this area of the County is currently served by well and septic) and schools infrastructure and services. Other necessary infrastructure and service impacts including the impacts to emergency services (Fire Rescue and Law Enforcement) are not analyzed so there is no data to determine the impact of this development on those services. The cost of providing those services to the proposed development cannot be calculated without knowing the impact on current services. A development this size could not be served by current infrastructure and provision of services this rural area of the County and would require both capital investments and personnel in order to provide service to this proposed community at acceptable levels. The following public facilities policies have been proposed in this application:

[Proposed EASP] Policy 10.5.5 Financing

To ensure the provision of adequate public facilities that avoid inequitable burdens on parties outside the EASP, the portion of the cost of public facilities and infrastructure having a rational nexus to 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 funding mechanisms within the EASP. The CDDs, or other appropriate funding mechanism, shall be established in conjunction with a DSAP. 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. 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) parks and (7) schools (8) fire, emergency operations, EMS and Police, and (9) restoration of wetlands, uplands and ecological features.

[Proposed EASP] OBJECTIVE 10.6 – IMPLEMENTATION

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

[Proposed EASP] Policy 10.6.4 DSAP Minimum Requirements

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

...

- d. Each DSAP shall demonstrate the adequate funding of infrastructure as required by Policy 10.5.5 for each phase of each development and shall identify the financial strategy to construct and maintain all required infrastructure.

[Proposed EASP] Policy 10.6.6            Infrastructure Financing Minimum Requirements

The County reserves the right to condition the approval of development on the availability of funding for the necessary infrastructure to support the proposed development.

[Proposed EASP] Policy 10.6.6.1            Capital Improvements Element Future Amendment

Prior to development approval, the county shall amend its Capital Improvements Element to include the timing and funding of public facilities required by the DSAP.

When taken together, these policies state that “the portion of the cost of public facilities and infrastructure having a rational nexus to impacts of developments within the EASP shall be funded by the developer,” (Proposed EASP Policy 10.5.5) and that this funding shall be determined at the DSAP stage. Proposed EASP Objective 10.6 seems to imply that the specific public facilities needed will be determined at each DSAP. Proposed Policy 10.6.6 states that the County reserves the right to condition approval of development on adequate funding of infrastructure and that the proposed EASP Policy 10.6.6.1 states that the Capital Improvements Element will be amended prior to development approval to included timing and funding of public facilities required by the DSAP.

There are no policies being proposed with this amendment that specify which public facilities will be needed, when, and at what cost. By proposing a policy that states that the developer will pay the “rational nexus” cost of the infrastructure and by not having proposed any policies that specifically describe the needed facility, or the cost and timing of those facilities, it is impossible for the County to determine what the financial liability for the County would be in approving this proposed amendment. Another issue with these policies is that by proposing to determine the needed infrastructure at the DSAP stage, the ability to plan and budget for overall public facility needs in a coordinated manner would be eliminated. As discussed further in Section VII. Statutory Requirements for Comprehensive Plan Amendments and Sector Plans of this Staff Report, the estimated public facility costs, including a delineation of when facilities will be needed, the general location of the facilities, and projected revenue sources to fund the facilities are required by State Statute (Section 163.3177(3)(a), F.S.) at the comprehensive plan amendment stage. This is the only way to ensure that a determination of what the public facility needs are and what those total estimated costs would be for the developer and for the county is considered prior to any decisions being made on adopting these proposed amendments into the Comprehensive Plan.

## **2. Public Schools Coordination and Capacity**

### ***a. Summary***

The application includes an analysis of public school capacity and needs associated with the residential development proposed in the application which identifies projected deficits at buildout in public school capacity at the elementary (1,481 student stations), middle (782 student stations) and high school (808 student stations) levels in the adopted school concurrency service area where residential development in the EASP would be located, but proposed EASP Policy 10.6.11.3 on “Schools coordination” does not respond appropriately to that analysis.

No data and analysis is provided to support the new proposed EASP Policy 10.5.4 (which would effectively amend adopted Future Land Use Element Policy 5.3.7 on public school location) that would add the new “EA-EAMU” Future Land Use designation to the Future Land Use designations in the Urban Cluster currently identified in the adopted Comprehensive Plan as areas within which schools would be “an allowable” as opposed to “a conditional” use.

### ***b. Analysis of Public Schools Coordination and Capacity***

The adopted Public Schools Facilities Element (“PSFE”) provides that “[i]t is the objective of Alachua County to coordinate land use decisions” such as comprehensive plan amendments, “with school capacity planning” ( PSFE Objective 1.1 ), and “for purposes of coordinating land use decisions with school capacity planning, the School Concurrency Service Areas (SCSAs) that are established for high, middle, and elementary school as part of the Interlocal Agreement for Public School Facility Planning shall be used for school capacity planning....” (PSFE Policy 1.1.3). Additional policies in the PSFE outline several issues to be considered by the School Board and County in reviewing and coordinating land use decisions and school capacity planning.

The applicant provided an analysis of public school facility needs with the EASP application in two sections of the supporting material. One (the “Land Use Data and Analysis Addendum” prepared by Sasaki and Associates, provided in Section IV.A of the application) is a generalized analysis of school needs corresponding to “on-site population estimates” associated with the residential buildout proposed in the application and is not adjusted for existing public school capacity. The other analysis (“Public Facilities Needs, Comprehensive Plan Amendment for Envision Alachua Sector Plan Amendment” by CHW, provided in Section IV.D of the application) is an analysis based on current public school capacity and the proposed residential land uses. Both are discussed below.

The “Land Use Data and Analysis Addendum” provided in Section IV.A (Table 5, p.6) of the supporting material submitted with the EASP application provides a more generalized analysis of “projections of school needs” which does “not factor in existing capacity.” This analysis

identifies a need for seven schools<sup>23</sup> corresponding to the proposed number of residential units within the planning area.

The more specific analysis of public facilities needs provided with the application takes into account current public school capacity within the Hawthorne School Concurrency area (Section IV.D, p. 5) and states that “based on current public school capacity, the proposed residential land uses, if/when fully built-out, will result in a deficit of student stations “at each of the three school levels (Elementary, Middle, and High) in the Hawthorne School Concurrency Service Areas. The total deficit identified in this analysis based on the potential enrollment at buildout is 3,071 student stations, and the deficit in 2035 (based on assumption of 40% buildout of residential units) would be 1,228 student stations. The applicant’s analysis and breakdown by school-type, provided with the EASP application, is shown in the tables below (extracted from the application):

TABLE 5: PUBLIC SCHOOL LOS GENERATION RATES (STUDENT STATIONS)				
School-type	Dwelling Units	Student Multiplier <sup>1</sup>	Potential Enrollment from Development	
			2035 <sup>2</sup>	Build-out
Elementary	10,500	0.159	668	1,670
Middle	10,500	0.08	336	840
High	10,500	0.142	470.4	1,176
Totals	-	-	1474.4	3,686

<sup>1</sup> Source: Alachua County Public Schools Student Generation Rates for Residential Development, 2014  
<sup>2</sup> The year 2035 represents the project’s development at 40% of complete build-out.

TABLE 6: PUBLIC SCHOOL LOS (STUDENT STATIONS)				
CSA	Projected Demand		Surplus/Deficit	
	2035 <sup>2</sup>	Build-out	2035 <sup>2</sup>	Build-out
(Elementary) Hawthorne	668	1,670	-592.4	-1,481
(Middle) Hawthorne	336	840	-312.8	-782
(High) Hawthorne	470.4	1,176	-323.2	-808

<sup>1</sup> Source: 2013-2014 Alachua County School Board Five-Year District Facilities Work Program  
<sup>2</sup> The year 2035 represents the project’s development at 40% of complete build-out.

Source: CHW, “Memorandum on Public Facility Needs, Comprehensive Plan Amendment for Envision Alachua Sector” dated June 20, 2014 (Exhibit IV.D of Envision Alachua submitted June 24, 2014

The analysis provided with the EASP states, “continued coordination will occur between Plum Creek and the Alachua County Public Schools as the project moves forward, which may result in the dedication of land for new facilities.” (p. 5 of Section IV.D) However, this statement was not translated into policy and the County cannot hold the applicant to anything but what is in policy. The only policy in the proposed EASP on “schools coordination”, proposed Policy 10.6.11.3, says “the preferred option for providing public schools for residents shall be the

<sup>23</sup> It should be noted that the more generalized analysis by Sasaki and Associates states that “prevailing student generation rates within Alachua County” were used, but no specific source was identified for the “Students per 1,000 households” multipliers used in the table in Section IV.A and these differ some from the Student Multipliers used in the tables in Section IV.D which identifies the “Alachua County Public Schools Student Generation Rates for Residential Development, 2014” as the source.

existing facilities currently serving that area that have available capacity”. This policy does not respond in an appropriate way and to the extent necessary to the analysis provided with the application that identifies deficits at buildout and by 2035.

County staff notes that there are currently no plans included in the School Board’s adopted capital plans to provide new public school capacity in the Hawthorne School Concurrency Service area, and the applicant provided no analysis on the potential capital costs that would be associated with providing new public school capacity to address the deficits identified or potential revenue sources. The Public School Facilities Element of the adopted Comprehensive Plan includes several goals, objectives and policies relating to intergovernmental coordination requirements and processes for future planning of public school system facilities that would apply to decisions regarding location, design and capital planning for new public school sites and facilities including associated supporting infrastructure. These adopted policies include Goal 4 “Promote and Optimize Intergovernmental Cooperation For Effective Future Planning of Public School System Facilities” and related objective and policies, and standards and criteria to guide the location of future public schools , and Goal 3 to “Provide Safe and Secure Public Schools Sited Within Well Designed Communities” and related objectives and policies.

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

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

Proposed EASP Policy 10.5.4 Schools

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

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



centers, linkages by bicycle and sidewalks with surrounding residential uses, and health/ safety considerations. Areas that “shall be avoided when locating future educational facilities” are identified in adopted Future Land Use Element Policy 5.3.1 and include noise attenuation areas, environmentally sensitive areas, areas designated for Rural/Agriculture land use, existing or designated industrial districts, and “any area where the nature of existing or proposed adjacent land uses would endanger the safety of students or decrease the effective provision of education.” There is no analysis provided with the EASP relating to these kinds of considerations for location of schools in connection with the suitability or basis for identifying public schools as “an allowable use” within the proposed new “EA-EAMU” Future Land Use category. This proposed land use category would provide for a wide range of uses including Industrial uses, and is proposed to be designated on the Future Land Use Map for an area which, as detailed elsewhere in this staff report, is lacking in key urban infrastructure, such as urban transportation facilities and services, potable water and wastewater disposal and treatment facilities. The lack of such an analysis and basis for this proposed EASP Policy 10.5.4, which would be the basis for future decision making by the School Board and the County on the planning and location of new public school facility capacity, is significant given the identification in the supporting data and analysis provided with the EASP application (in section IV of the application material) of deficits in school capacity relative to new student stations needed for projected demand associated with the new residential units proposed as part of the EASP.

### **3. Potable Water and Sanitary Sewer Facilities**

The “Public Facilities Needs Analysis” (Section IV.D, p.2) submitted with the application identifies a need for new potable water and sanitary sewer public facility capacity to serve the proposed development in the planning area. According to the information provided with the application this development is projected to generate 4.09 mgd (million gallons per day of demand for potable water and “wastewater flows at buildout between medium and high values of 3.68 and 5.66 mgd” and an associated need for new wastewater treatment plant (WWTP) capacity of 5.1 mgd at buildout. The overall estimate of the cost of these needed potable water and sanitary facilities at buildout is identified in the application as \$96 million, of which \$39 million is for potable water facilities, and \$57 million is for wastewater treatment facilities. The background information submitted with the application indicates that the “capital facilities to serve this [potable water] demand will likely be an expansion of the Hawthorne water system and development of an additional water plant, including about five additional wells”, and “the capital facilities to serve these [wastewater] flows will likely be an expansion of the Hawthorne’s potable water and wastewater treatment facilities, and development of an additional wastewater plant with treatment to at least minimum public access standards.”

Although there is some general information in the material submitted with the application (discussed in more detail below) about City of Hawthorne facilities and construction plans “on the shelf for expansion when needed”, and two lines in a Table called “Capital Improvements

Projections” with general information for what is described as “various” “Potable Water Supply and Treatment” and “Wastewater Treatment and Reuse” projects in 2035 and “build-out”\*, there is no information provided on any specific projects to meet these water and wastewater facilities needs including proposed location, timing, and cost and funding, for specific projects<sup>24</sup> needed in the supporting materials submitted with the application, and there is no analysis of the suitability and feasibility of possible locations, timing and specific funding sources for those facilities as a means of serving new development proposed in the application. As discussed in the part of this staff report on “Permitted Uses and Development Program” (contained in Section III Land Use Analysis of the Staff Report) the proposed policies under Objective 10.3 “EA-EOMU Standards” would allow for a wide range of potential distribution, density and intensity of development within the different categories of uses proposed in the five areas within the EO-EOMU designation on the Future Land Use map. As a result of the unpredictability of where, what and when development would take place based on the proposed policies, it may be difficult to identify particular potable water and wastewater infrastructure projects to effectively and efficiently serve the proposed development program; however, the deferral of the identification of such substantial infrastructure projects (estimated to cost \$96 million by buildout), and consideration for inclusion in the County’s Capital Improvements Element until sometime “prior to development approval” as proposed by EASP Policy 10.6.6.1 (“Capital Improvement Element Future Amendment”) is not justified by this difficulty, and the lack of an overall plan for such needed facilities as part of the comprehensive plan will impair efficient and effective planning for such facilities.

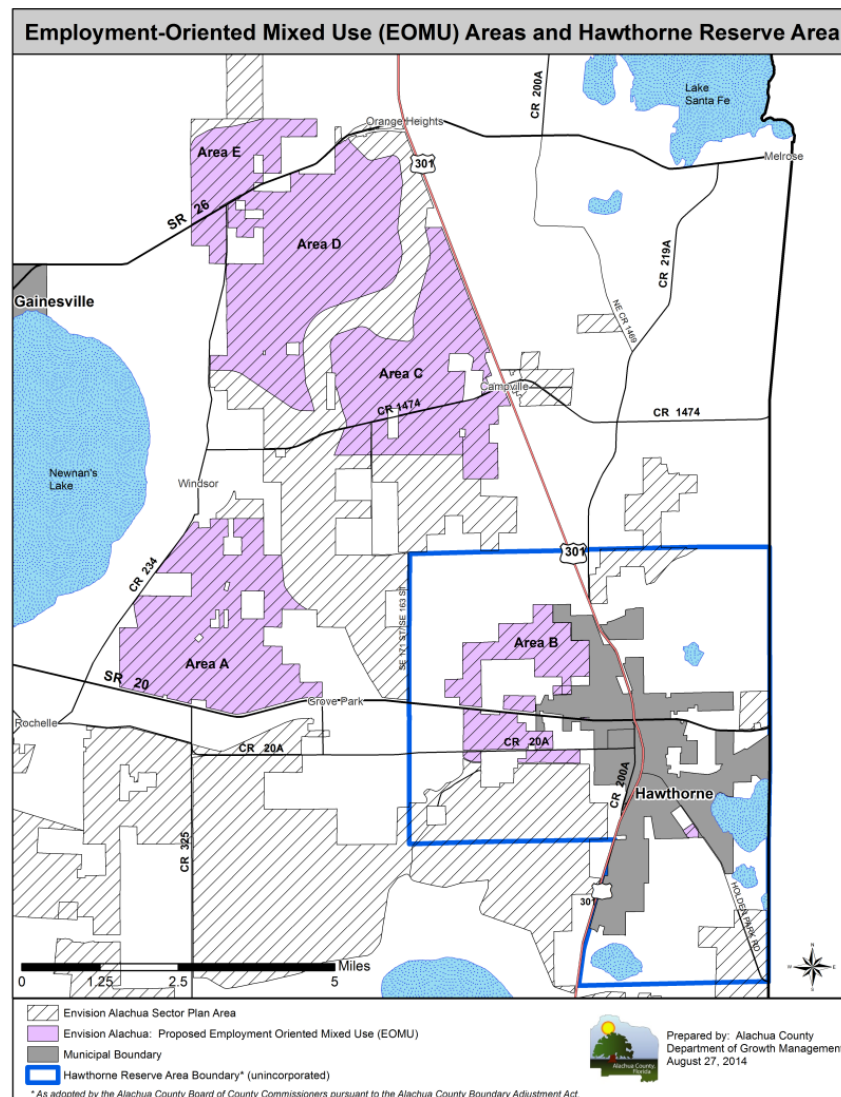
As detailed below, the analysis of the capacity of the City of Hawthorne facilities provided with the application is incomplete because it does not take into account demands on those facilities that will result from future development within the City of Hawthorne based on the City’s adopted Comprehensive Plan.

The only policy proposed for adoption as part the EASP application on centralized potable water and sanitary sewer facilities is proposed EASP Policy 10.5.2.2 “Potable Water and Sanitary Sewer- Hawthorne Reserve Area” which says “The preferred option for the provision of centralized potable water and sanitary sewer services to the lands within the Hawthorne Reserve Area shall be the City of Hawthorne” (see Map 19 showing portion of the proposed EO-EOMU area within the Hawthorne Reserve Area below). This proposed policy is not supported by complete data and analysis, and there is no policy in the EASP application proposed for adoption on how potable water and sanitary sewer service are expected to be provided to the

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<sup>24</sup> The description for Table 7. Capital Improvements Projections in section IV.D “Public Facilities Analysis” (p.6) identifies these two categories of projects (as well as other categories of facilities) for the two time horizons and overall costs in these two categories; footnotes to the table say “potable water improvements include water supply wells, treatment, storage, pumping, site pumping and electrical and trunk lines” and “sanitary sewer improvements include a new wastewater treatment plant, improvements to the Hawthorne plant, force mains and lift stations.” There is no breakdown of the costs of the various improvements in these two categories, their timing, or specific funding source. The Table lists potential funding sources lists says “include developer/CDD, connection fees, grants, impact fees, and special assessment fees.”

substantial amount of EASP development on land outside the Hawthorne Reserve Area. There is also a lack of appropriate policy proposed as required for sector plans (Section.163.3245(3)(a)7, F.S.) to address the interjurisdictional impacts associated with this proposed reliance in part on City of Hawthorne public facilities for potable water and wastewater treatment to serve uses proposed within the unincorporated area corresponding to the Hawthorne Reserve Area.



**MAP 19. EMPLOYMENT-ORIENTED MIXED USE AREAS AND HAWTHORNE RESERVE AREA**

The analysis of “Public Facilities Needs, Comprehensive Plan Amendment for Envision Alachua Sector Plan Amendment” by CHW, provided in Section IV.D of the application (p. 2) forecasts “a medium potable water demand at buildout of 4.09 MGD, and says “the capital facilities to serve this demand will likely be an expansion of the Hawthorne water system and development of an additional water plant, including about five additional wells.” The analysis states that “the generalized estimated total capital cost of these facilities is about \$39 million” of which “an estimated \$32 million would be required by 2035.”

The analysis of public facility needs provided with the application says that “sanitary sewer requirements are directly related to the amount of the project’s projected water demand” and that wastewater treatment plant capacity needed for the proposed EASP development is projected to be “5.1 MGD at build-out based on 1.25 of the projected sanitary sewer demand”, with 40% of this or 2.04 MGD needed in 2035. The estimated cost of sanitary sewer facilities identified in the application is “about \$57 million, of which an estimated \$39 million would be required by 2035 assuming flows increase in a straight-line fashion through buildout.” (Section IV.D, p. 2 and Table 7 of the application)

The analysis states that “as required by the Alachua County Comprehensive Plan, LOS standards must be maintained...therefore, at the DSAP adoption, the Alachua County Capital Improvements Element will be amended accordingly to demonstrate fiscal feasibility for LOS maintenance as outlined in the Financial Impact Analysis.”

The analysis states that “all wastewater treated within the Employment Oriented Mixed Use (EOMU) areas...will be treated to minimum public-access-reuse standards via onsite facilities, or, when feasible existing facilities (*i.e.*, City of Hawthorne).” (Section IV.D, p.2).

The above data and analysis and related policies raise issues relating to intergovernmental coordination and deferral of identifying public infrastructure and service needs in policy, including cost and timing, to later consideration for inclusion in the Capital Improvements Element of the County’s Comprehensive Plan.

A letter is provided from the Mayor of Hawthorne with the application stating that “the City of Hawthorne is able to provide water and wastewater services to the Employment Oriented Mixed Use lands adjacent to the City limits within the Envision Alachua Sector Plan.” This letter outlines available capacity of the City’s water facility (“Consumptive Use Permit for 92 million gallons annually with about 50% of available capacity at this time” County staff notes that Consumptive Use Permit #1674 that is online specifies categories of land use associated with specific amounts of groundwater withdrawal, which suggests further analysis of the CUP is warranted), and “wastewater treatment plant capacity of .200mgd” processing “an average of only about .054 mgd.” The letter notes, Hawthorne has “construction plans ‘on the shelf’ for expansion when needed...” and “anticipates further expansions of these systems as needed.” Based on additional information from City of Hawthorne staff, County staff understands that the design capacity of the current City of Hawthorne wastewater treatment plant would allow for expansion to provide an additional .3 mgd of wastewater treatment capacity.

This information relating to the ability of the City of Hawthorne to serve the portion of future development proposed by the EASP application in the area adjacent to city limits (or in Hawthorne’s Reserve Area as discussed in proposed Policy 10.5.2.2) is incomplete insofar as there is no analysis of projected demands on the Hawthorne water and sewer facilities to serve future development on unbuilt lands that are designated for industrial, commercial or residential uses within the adopted City of Hawthorne Comprehensive Plan. This includes for

example 368 acres of undeveloped land designated for industrial use identified by the City of Hawthorne Comprehensive Plan, and substantial undeveloped areas designated for commercial and residential use. A detailed analysis of the specific anticipated uses within these areas would be appropriate, but in the absence of such analysis, County staff has prepared an assessment based on available data of the potential demand just from the 368 acres of undeveloped lands designated for future industrial use in the Hawthorne Comprehensive Plan, as follows:

If the analysis of projected demand for water and projected wastewater flow for “advanced manufacturing”<sup>25</sup> provided in the “Water Supply Data and Analysis” by CH2MHill provides some indication of potential demand of the unbuilt Industrial uses designated in the Hawthorne Comprehensive Plan, then future water and sewer demand for development of these Industrial designated lands in Hawthorne could be estimated using the same method and demand multipliers utilized in the CH2MHill analysis. Using the “medium” multipliers for water use and wastewater flows associated with “advanced manufacturing” uses that were provided in the “Water Supply Data and Analysis” (1,848 gallons per acre per day of water and 1,663 gallons per acre per day of wastewater flow), the projected demand resulting from future development of the 368 acres of unbuilt industrial lands currently designated in the Hawthorne Comprehensive Plan would be about 0.68 mgd for potable water and 0.6 mgd for wastewater flow<sup>26</sup>. The projected water-use demand would be more than three times the design capacity of the existing Hawthorne potable water system. The projected wastewater flow would be more than ten times the 0.054 mgd on average that is currently processed, and would be three times the 0.200 mgd capacity of the existing Hawthorne Wastewater Treatment Plant according to information submitted with the application, and it would also exceed the .5 mgd future design capacity of the Hawthorne plant).<sup>27</sup>

The EASP proposed policies in the application do not respond adequately to data and analysis regarding Potable Water and Sanitary Sewer facilities needs for several reasons. As noted above, the information and analysis provided with the application on Hawthorne Potable Water and Sanitary Sewer facilities focuses only on capacity of the existing system and potential expansion, but does not take into account potential demands on those systems for new industrial and other development designated on the adopted Future Land Use map in the Hawthorne Comprehensive Plan. When this is recognized, data and analysis does not support proposed EASP Policy 10.5.2.2 on “Potable Water and Sanitary Sewer- Hawthorne Reserve

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<sup>25</sup> The CH2MHill analysis notes (Section IV.D.1, p3-3) “Advanced manufacturing water use values are based on typical usage for no or little wet-process-type industries” (Plum Creek Envision Alachua application, June 24, 2014, Section IV.D.1 page 3-3), so this may be a conservative analysis of potential demand for other industrial uses

<sup>26</sup> The CH2MHill analysis bases wastewater “flow” on 90% of potable water projections, but in terms of wastewater treatment *plant capacity*, “flow” may equate to a higher number- e.g. the CHW analysis (Exhibit IV.D, p. 2) submitted with the application uses a multiplier of 1.25 for purposes of WWTP plant capacity.

<sup>27</sup> Based on information from City of Hawthorne Public Works staff

Area” which says “The preferred option for the provision of centralized potable water and sanitary sewer services to the lands within the Hawthorne Reserve Area shall be the City of Hawthorne.”

Aside from the incomplete analysis of the potential capacity of the City Hawthorne facilities to serve the proposed EASP development “adjacent to” or within the Hawthorne Reserve Area, there is no analysis of the additional potable water and wastewater facilities that are identified in the application and recognized as likely needed to serve the substantial development proposed in other areas of the EASP/EOMU area outside the Hawthorne Reserve Area, and there are no policies or capital improvement projects proposed to address these facility needs.

The information provided with the application and the supplementary analysis by County staff indicates a need to address intergovernmental coordination issues related to coordination of how potable water and sanitary sewer facilities projected to be needed to serve the proposed development will be coordinated with the City of Hawthorne. The generic proposed EASP policy 10.6.11 which calls for the County to report on the status of conservation, the implementation of DSAPs, and job creation in the Planning area does not respond appropriately to this issue and does not satisfy the requirement for sector plans in the Community Planning Act, section 163.3245(3) (a) 7. F.S, which calls for “Identification of general procedures and policies to facilitate intergovernmental coordination to address interjurisdictional impacts from the future land uses.”

There are policies in the adopted Alachua County Comprehensive Plan which establish a general framework for addressing such intergovernmental coordination issues which were not addressed in the application. These include adopted Potable Water & Sanitary Sewer Element (PWSS) Objective 3.1.1 and related policies such as 3.1.2, which call for coordination of expansions in municipal potable water and sanitary sewer systems through mechanisms consistent with the Intergovernmental Coordination Element, and PWSS Policy 3.1.3 which calls for “a timing, staging, and capacity program in conjunction with municipalities...for expansion of potable water and sanitary sewer facilities into unincorporated service areas...in accordance with ICE[Intergovernmental Coordination Element], Policy 5.1.7” and states “The Capital Improvements Programs/Elements of Alachua County and municipalities shall specify such facility expansion programs.” These adopted policies in the County’s Comprehensive Plan have not been addressed as part of the EASP application.

The application identifies a total of \$96 million in needed potable water and sanitary sewer facility capacity at buildout associated with the proposed land uses, including \$39 million for potable water supply capacity and \$57 million for centralized sewer treatment capacity, but provides no information other than minimal information in Table 7 of Section IV.D of the application on the proposed projects, their location, or specific funding sources for the capital projects that would be needed to provide this capacity. The proposed EASP policies -EASP Policy 10.6.6.1 (Capital Improvement Element Future Amendment), EASP Policy 10.5.5 (Financing) and

EASP Policy 10.5.2.1 (Potable Water and Sanitary Sewer-EOMU which would require development “within the EA-EOMU” “to connect to a centralized potable water and sanitary sewer system for service by FDEP permitted potable water and wastewater treatment plants”- defer consideration of the capital improvement program to address these needs to development approval. There is also no analysis of these undefined projects for consistency with various policies in the County’s adopted Capital Improvement Element such as those under Objective 1.1 (“coordinate the timing and location of capital improvement projects with improvement projects of other agencies and jurisdictions and ensure the Capital Improvement Element is consistent other elements of the Comprehensive Plan”) and under those policies under Objective 1.5 on priorities for capital improvement projects consistent with fiscal capacity and priorities for elimination of deficiencies.

#### **4. Fiscal Impact Analysis Model**

In order to address the question of the County’s potential monetary liability in providing urban infrastructure and public services to the proposed development, the applicant has provided a Fiscal Impact Analysis Model (FIAM) to support the proposed Sector Plan comprehensive plan amendment. The FIAM utilizes existing County demographic and fiscal data to analyze the potential impacts a new development could have on the County’s capital and operational funding. The FIAM utilizes the County’s current funding levels for its services to assess what the costs of services to the proposed development will be. In addition, the FIAM provides an analysis of what anticipated County revenues would be based upon property taxes and other revenues. Expenses for services necessary to serve the development are related to the number of full time residents, the number of full time employees, the number of temporary visitors, or a combination of these factors. This review of the FIAM covers three areas, generally: Operating Revenue and Expenditures, Employment, and Capital Revenue.

##### *(a) Operating Revenue and Expenditures*

Appendix Table 6 of the report is a summary of the input variables used in the FIAM. For the purposes of analysis, the FIAM has assumed that the build-out of the Envision Alachua Sector Plan will occur in equal increments each year, beginning in 2016 and ending in 2066. Thus, approximately 2 percent of each development category is programmed each year. Appendix Table 6 of the FIAM includes a variable for property value growth rate and for inflation. The FIAM assumes that residential property values will increase at a rate of 1.5% while non-residential properties will increase at a rate of 2.0%.

Although not included in the report submitted by the applicant, the FIAM also assumes that County budgeted revenues and expenditures would grow by 1.5% each year, with an underlying assumption that this will be sufficient to fund existing services at their current level. However, as evidenced by the County’s reduction in positions and programs in the recent past, it is not clear that the cost of providing services will grow at the same rate as revenue. Generally, the

County's annual increase in cost of providing services has exceeded the growth of revenues necessary to support those services. As an example, the cost of maintenance of roadway infrastructure has been demonstrated to have exceeded the revenues available for this service. Thus, it is likely that revenue projections in excess of service costs, as provided in the FIAM, are overly optimistic.

The applicant's analysis also presumes that the County will continue to provide services at existing levels, and that new development will not create the need for new services. This is an unlikely presumption. As an example, the development of large-scale industrial uses may change the type of fire apparatus necessary to support the development. Also, the FIAM assumes that the cost of providing existing services to the proposed development will not exceed the cost of providing those services to existing development. There are several factors, however, that are not considered in the FIAM model that would contribute to higher cost of service provision to development within the Envision Alachua Sector Plan. One factor is the location of the proposed sector plan. Providing services to this rural location would be substantially more expensive than providing services within the Urban Cluster. A second factor affecting cost of service provision is that there is a strong possibility that full buildout of this development will not happen as assumed with the FIAM. A less than full buildout scenario would make service provision more expensive because the services would still have to be provided but the revenue would be much less than assumed in the model.

#### *(b) Employment*

The proposed policies do not respond appropriately and to the extent necessary to the data and analysis in the FIAM. The FIAM provides an estimate of employment within the proposed development based on specific ratios for each sector. Appendix Table 6 includes Office, Retail/Service, and Industrial/Manufacturing employee to thousand square foot ratios of 3.08, 1.67, and 0.8, respectively. Proposed EASP Policy 10.2.6.4.b.iv provides employee to thousand square foot ratios to be used to evaluate the provision of jobs. The Office, Commercial and Advanced Manufacturing ratios are 4.0, 2.5, and 1.2, respectively. The ratios identified in the FIAM and those from the proposed policy are not consistent.

The FIAM indicates that the number of employees for the development program at buildout is 27,362 (Appendix Table 1, Year 2067). Presumably, this number includes both full- and part-time employment. The same table indicates Full Time Equivalent (FTE) employees as 6,515. Full Time Equivalent employees represents the number of full time positions if one were to add all employment hours and divide by the standard work week. Based upon the 10,500 units proposed by the Sector Plan, the employment would be 2.6 employees per unit or 0.62 FTE employees per unit. Proposed EASP Policy 10.2.6.4.a of the Sector Plan identifies a "jobs-to-housing balance of 3 jobs per residential unit." The FIAM does not support the proposed EASP policy regarding job creation.



The number of full time employees is computed using the ratio of employees to full-time employees for Alachua County currently. Thus, the FIAM proposes that there will be no difference between the ratio of full- to part-time employees as a result of development in the proposed Envision Alachua Sector Plan as exists in Alachua County today. This is important because several of the service category costs identified in the FIAM are based upon the number of full-time employees. If the ratio of full-to-part-time employees were higher in the Sector Plan, it is almost certain that there would also be increased service delivery costs beyond what is proposed in the FIAM. This would result in a narrowing of the anticipated revenue excess projected by the applicant.

### *(c) Capital Revenue*

The FIAM indicates that the development will generate \$159,947,150 in transportation mitigation revenues over the 50-year project timeframe. It appears that the calculation of this revenue is loosely based on the existing adopted Multi-modal Transportation Mitigation for the Mobility Districts of the Urban Cluster and is not adjusted for inflation. However, although the proposed EASP Transportation Mobility Element Policy 1.10.3.a requires adoption of an “EA Mobility Fee,” the amount of the fee is not identified. Within the Urban Cluster, the MMTM is based upon the cost of improvements identified in the Capital Improvements Element that are necessary to support the growth of VMT over the planning horizon. However, because the proposed EASP TME Policy 1.10.11 does not identify costs of proposed enhancements it is impossible to determine whether an MMTM would cover any capital transportation costs caused by the development. Therefore, it is unclear that the necessary transportation mitigation revenues to cover the impacts of development will be realized.

The FIAM indicates that the development will generate \$2,774,000 in fire impact fees. The capital costs of a single fire station are likely to exceed the projected revenues generated through impact fees. As an example, Fire Rescue Station 17, the most recently constructed new facility, cost approximately \$1,600,000 in 2008. Current estimates for capital apparatus costs for a new fire rescue station are approximately \$1,000,000, including a rescue unit and a quint (fire truck). Thus, based on best available estimates, total capital costs for a new fire rescue station and apparatus would be approximately \$2,600,000 in current year dollars. Additionally, the full amount of impact fee revenue would not be available to the County until build-out of the development, *i.e.*, in 50 years. This means that, in the short term, the County would be required to fund some portion of a station. Further, the applicant has not provided data regarding what fire rescue capital would be required to serve the development at existing levels of service.

The FIAM, on Page 5, states that, “if additional fire stations are required to serve the new development, the Developer has agreed to fund the expenditures through increased impact fees and special district financing.” However, the applicant has not provided any policy language to support this statement. Proposed EASP Policy 10.5.5 indicates that the applicant

will fund the cost of public facilities having a rational nexus to the impact of development through a Community Development District, or other appropriate funding mechanism. Since impact fees are based on the rational nexus test it is unclear whether the applicant will provide the full funding necessary to support fire and Emergency Medical Services service for the development if the capital costs for these services exceed anticipated impact fee revenue. In addition, capital expenditures like a fire station must be built up front though the impact fees will be collected over time and only entirely collected if the development reaches full build-out. The upfront cost of building a station has the potential to be a substantial financial burden on the County.

### **C. Conclusion of Public Facilities and Services Analysis**

The proposed policies are not consistent with Section 163.3177, F.S. and with requirements in the County's Comprehensive Plan for comprehensive plan amendments. Public facilities and infrastructure needed as a result of a proposed development should be identified, including timing and funding, in an amendment to the Capital Improvements Element at the time of the proposed comprehensive plan amendment.

These related CIE amendments should be included as part of the Long Term Master Plan comprehensive plan amendment process as the plan for infrastructure provision is an important component of consideration of the overall proposed Envision Alachua Plan. Infrastructure and service provision is one of the largest expenditures of Alachua County government and, because that piece of the puzzle is not included for consideration with a land use amendment of this size and impact, staff cannot recommend approval of the proposed Envision Alachua Sector Plan.

The application includes an analysis of public school capacity and needs associated with the residential development proposed in the application which identifies projected deficits at buildout in public school capacity at the elementary (1,481 student stations), middle (782 student stations) and high school (808 student stations) levels in the adopted school concurrency service area where residential development in the EASP would be located, but proposed EASP Policy 10.6.11.3 on "schools coordination" does not respond appropriately and to the extent necessary to that analysis.

No data and analysis is provided to support the new proposed EASP Policy 10.5.4 (which would effectively amend adopted Future Land Use Element Policy 5.3.7 on public school location) that would add the new "EA-EAMU" Future Land Use designation to the Future Land Use designations in the Urban Cluster currently identified in the adopted Comprehensive Plan as areas within which schools would be "an allowable" as opposed to "a conditional" use.

The applicant's FIAM data and analysis was based on employment ratios for job generation that are different than those used in the proposed EASP policies. The applicant's analysis also contained a different jobs to housing generation number and make-up (part time versus full

time) than the proposed EASP policies, resulting in many more part time jobs produced by this proposed development than full time jobs. In addition, the Envision Alachua Sector Plan proposes a new multi-modal transportation district for the subject property but uses the County's current Multi-modal Transportation Mitigation fee. This current fee is not appropriate for the EASP area because it has been calculated for development within the Urban Cluster based on an analysis of needed facilities and construction costs adopted into the Capital Improvements Element to provide transportation mobility within the cluster. The FIAM analysis should have used a proposed MMTM fee based on projects that would be required to be constructed as a result of the proposed Sector Plan development.

It is unclear whether the job generation numbers and jobs to housing balance number is correct in the FIAM analysis or in the proposed policies in the application and it is unclear whether the applicant is proposing that impact fees and MMTM will be the only upfront costs provided by a future developer to fund infrastructure and services needed as a result of development of this proposed Sector Plan. The FIAM model is based on full build out of the development. There is too much uncertainty in the rates of development over the next 50 years to have confidence that this development would reach its maximum densities and intensities. Along with the uncertainties of the numbers used in the FIAM model, based on the proposed EASP policies related to public facilities and services needed as a result of this proposed amendment, the costs to the County for initial construction of infrastructure and long-term maintenance of that infrastructure and other provision of services could be substantial.

## VII. Statutory Requirements for Comprehensive Plan Amendments and Sector Plans

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

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

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

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

The proposed Envision Alachua Sector Plan is not consistent with this requirement for comprehensive plan amendments. The limited data provided by the applicant shows a need for public facilities and infrastructure to accommodate the demands of the development but no specific policies are provided to ensure its provision. The data also shows that this area of the County is environmentally sensitive containing all of the conservation qualities listed in the

Alachua County Comprehensive Plan including wetlands, habitats, and geologic features to name a few. The applicant has not provided adequate data or analysis that supports how and where they wish to locate most of this proposed development's intensity and density in relation to these natural resources. In fact, Area A is likely the most environmentally sensitive and wet areas of the 11,393 acre EOMU yet it may contain most of the proposed development. The applicant has not reacted in an appropriate way to the data they have collected for this application.

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

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

The applicant has not proposed a capital improvements element amendment for public facilities that would be necessitated by approval of this proposed development. As outlined above, this amendment to the capital improvements element should include estimated costs, timing, general location and projected revenue sources to fund the improvements. The applicant proposes scattered policies that generally list a few transportation improvements and speak to developer funding of some of the infrastructure but the proposed policies do not meet the intent of this section of state statute and only transportation facilities are included. Other facilities including portable water and sanitary sewer facilities, education, fire and rescue, emergency services, with timing and funding provisions, should have also been included in order to meet this section of statute.

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

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

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

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

Most of the applicant's property has been designated as a Strategic Ecosystem in the County's Comprehensive Plan for its unique environmental features and need of protection of those features as required by Section 163.3177(6) (a) (2)(c), F.S. This character of land was taken into account in the creation of the County's Comprehensive Plan that defined an Urban Cluster line as a strong boundary separating urban uses from rural and environmentally sensitive areas. The applicant does not take the character of this rural and environmentally sensitive land into account in proposing these intense urban uses across 11,393 acres of their property. There are no proposed policies specifically identifying provision of water supply facilities, or other public facilities or services that will be needed as a result of this development as required by the statutory provisions above. This proposed developed would be presumed to be urban sprawl as identified below in the discussion of Section 163.3177(6) (a) 9.a F.S. Though the proposed application does discuss the need for job creation and economic development in accordance with Section 163.3177(6)(a)(2)(i), it does not supply any data and analysis that supports the

provision of such intense uses on this property and does not analyze the rest of the County for potentially more suitable locations.

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

...

*e. Coordinate future land uses with the topography and soil conditions, and the availability of facilities and services.*

*f. Ensure the protection of natural and historic resources.*

*g. Provide for the compatibility of adjacent land uses.*

...

The applicant has not demonstrated that the proposed intensity and density of an urban land use is appropriate for a property with such extensive poorly drained soils as required by the statutory provision above. The majority of the soils (approximately 95% of the project area) in the EOMU area consists of somewhat poorly drained to very poorly drained soils, and are not suitable for urban uses. Alachua County Comprehensive Plan COSE Policy 4.2.1 states that the characteristics of soil suitability and capability shall be considered in determining appropriate land uses. As discussed previously, urban facilities and services are not currently available to this area in the type and amount that would be needed for the proposed development and they are not proposed in the Envision Alachua Comprehensive Plan amendment. As explained in detail in Section IV Natural Resources Analysis of this Report, this amendment does not ensure the protection of the natural resources and proposes to take the County's authority over resources regulation away in the areas proposed for the most intense development.

Florida Statutes Section 163.3177 (6) (a) 4. *The amount of land designated for future planned uses shall provide a balance of uses that foster vibrant, viable communities and economic development opportunities and address outdated development patterns, such as antiquated subdivisions. The amount of land designated for future land uses should allow the operation of real estate markets to provide adequate choices for permanent and seasonal residents and business and may not be limited solely by the projected population. The element shall accommodate at least the minimum amount of land required to accommodate the medium projections as published by the Office of Economic and Demographic Research for at least a 10-year planning period unless otherwise limited under s. 380.05, including related rules of the Administration Commission.*

The Alachua County Comprehensive Plan has been created to provide a balance of uses for a viable community and economic development. The amount of land designated for each future land use allows the operation of the real estate market and provides much more than the minimum amount of land required to accommodate the medium population projections. The future land uses in the Comprehensive Plan were designed to meet these statutory

requirements, taking into account the nature of the land, the proximity of residences to the services they need and the ability to provide services in an efficient and fiscally sound manner. The proposed Envision Alachua Sector Plan does not have enough data and analysis or proposed policies for staff to analyze the fiscal soundness of a development of this size. The location is uniquely environmentally sensitive and quite removed from the urban core, which substantially increases the cost of urban public service provision.

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

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

- (I) Promotes, allows, or designates for development substantial areas of the jurisdiction to develop as low-intensity, low-density, or single-use development or uses.*
- (II) Promotes, allows, or designates significant amounts of urban development to occur in rural areas at substantial distances from existing urban areas while not using undeveloped lands that are available and suitable for development.*
- (III) Promotes, allows, or designates urban development in radial, strip, isolated, or ribbon patterns generally emanating from existing urban developments.*
- (IV) Fails to adequately protect and conserve natural resources, such as wetlands, floodplains, native vegetation, environmentally sensitive areas, natural groundwater aquifer recharge areas, lakes, rivers, shorelines, beaches, bays, estuarine systems, and other significant natural systems.*
- (V) Fails to adequately protect adjacent agricultural areas and activities, including silviculture, active agricultural and Silvicultural activities, passive agricultural activities, and dormant, unique, and prime farmlands and soils.*
- (VI) Fails to maximize use of existing public facilities and services.*
- (VII) Fails to maximize use of future public facilities and services.*
- (VIII) Allows for land use patterns or timing which disproportionately increase the cost in time, money, and energy of providing and maintaining facilities and services, including roads, potable water, sanitary sewer, stormwater management, law enforcement, education, health care, fire and emergency response, and general government.*
- (IX) Fails to provide a clear separation between rural and urban uses.*



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

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

Florida Statutes for comprehensive plan amendments require that amendments discourage the proliferation of urban sprawl. Section 163.3177(6) (a) 9.a.F.S., above, lists indicators that a plan amendment does not discourage urban sprawl. Plum Creek's Envision Alachua Sector Plan is proposed outside of the Urban Cluster in the rural area. The proposal is to designate significant amounts of urban development to occur in rural areas at substantial distances from existing urban areas while not developing undeveloped lands that are available and suitable for development. (Urban Sprawl Indicator II above). As analyzed in this report previously, including in Section IV Natural Resources Analysis Section, the proposed application fails to adequately protect and conserve natural resources such as wetlands, floodplains, native vegetation, environmentally sensitive areas, natural groundwater aquifer recharge areas, lakes, wildlife corridors and other significant natural systems. (Urban Sprawl Indicator IV). 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). The proposed amendment also fails to provide a clear separation between urban and rural uses. (Urban Sprawl Indicator VI) There are enclaves within the EA-EOMU area that would remain rural and under the County's current regulations without adequate data to support surrounding rural uses with dense urban uses.

Florida Statutes states that a plan amendment would be determined to discourage sprawl if it can meet four of the criteria outlined above in Section 163.3177(6) (a) 9.b I – VII. The 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.

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.

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.

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.

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.

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.

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

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

## **VIII. Conclusion and Preliminary Staff Recommendation**

Staff has reviewed the Envision Alachua Sector Plan application, including the supporting data and analysis, and created this report for the County Commission workshops. Based on the evaluation of the application as submitted, staff is recommending denial of this proposed comprehensive plan amendment. The application and accompanying backup material do not support the proposed density and intensity that would be allowed by the proposed policies. The proposed amendment does not provide for the adequate protection of natural resources. This rural area, which the application proposes for large-scale urban uses, lacks urban infrastructure or the proximity to existing urban infrastructure that would make extension of urban public services viable and efficient. A key issue for local governments in planning for urban growth in an area is the identification and establishment of a capital improvement program identifying projects and policies needed to serve the public. These facilities include those needed for services such as potable water supply, wastewater treatment, transportation and public schools. There are no proposed policies providing commitments that any specific public facilities and services will be constructed or funded. In addition, the proposed intense urban land uses are not compatible with the surrounding rural area and lifestyle. The amendment would also render the Comprehensive Plan internally inconsistent.

Both development trends in the County and most population projections do not support the potential for full buildout of the residential uses proposed in the EASP area. Likewise, there has been a limited demand for new industrial development, as indicated by things such as development applications and approvals for such uses, in comparison to the unbuilt land designated for Industrial uses in areas that are more suitable in terms of the full range of public facility and infrastructure capacity for such development in the adopted Comprehensive Plans of the County and its cities. As concluded in the report submitted with the EASP application “Plum Creek, UF, and Economic Growth in the Gainesville Region”, “...over a horizon of 50 years, it makes little sense to imply anything is known with a high degree of certainty – there are too many things about the future that are crucial but unknown.” This recognizes the possibility that the new 15.5 million square feet of industrial and other non-residential uses proposed in the EASP might not be realized. This uncertainty about the likelihood that the proposed development in the EASP area will be fully built-out, highlights the risks from a fiscal and economic perspective that would result from a partial buildout of the development program this EASP plan amendment is intended to accommodate. Such a partial build out could create a situation where new capital facilities sized and located to meet the needs for potable water and wastewater system capacity, roads, and other public facilities and services at buildout will entail significant capital and maintenance costs, while the revenues projected based on a full buildout scenario are not realized, resulting in substantial negative fiscal and economic impacts.




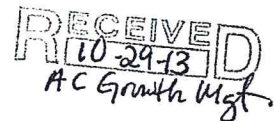
Exhibit # 1  
Information from Plum Creek  
Sector Plan Scoping Meeting  
September 23, 2013

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October 25, 2013

TO: Plum Creek Sector Plan Scoping Meeting Participants  
FROM: Scott R. Koons, AICP, Executive Director   
SUBJECT: Transmittal of Final Summary of Proceedings for the  
Plum Creek Sector Plan Scoping Meeting and  
Recommendations from Scoping Meeting Participants



A final summary of proceedings for the above-referenced scoping meeting is attached. Two comments were received regarding the draft summary. One change was made on page two to replace the referenced 10,500 projected jobs with 30,000 projected jobs. Another change was made on page five to note that Kris Cathey of the Florida Fish and Wildlife Conservation Commission requested that the long-term master plan provide additional information regarding allowable high-intensity agricultural uses, if any, as well as allowable low-intensity agricultural uses within agricultural lands identified as conservation areas.

Written comments and recommendations were received from Alachua County, Putnam County, the St. Johns River Water Management District, the Florida Department of Environmental Protection and the Florida Department of Transportation. In addition, pursuant to Subsection 163.2345, Florida Statutes, written recommendations adopted by the Council at its October 24, 2013 meeting on the issues requested by Alachua County are also included. All written comments and recommendations are included in Appendix C.

If you have any questions concerning this matter, please do not hesitate to call me at extension 101, or Steven Dopp, Senior Planner, at extension 109.

Attachment

v:\sector plans\plum creek\scoping meeting final sop cover memo.docx

Dedicated to improving the quality of life of the Region's citizens,  
by coordinating growth management, protecting regional resources,  
promoting economic development and providing technical services to local governments.

1



SUMMARY OF PROCEEDINGS OF THE  
PLUM CREEK SECTOR PLAN  
SCOPING MEETING

Multi-Purpose Meeting Room  
Gainesville Regional Utilities  
Gainesville, Florida

September 23, 2013  
9:30 a.m.

I. Opening Remarks, Agenda Review, and Introductions

Scott Koons, Executive Director of the North Central Florida Regional Planning Council, opened the Scoping Meeting 9:34 a.m. He stated that the purpose of the scoping meeting is to carry out the requirements specified in Section 163.3245, Florida Statutes, and reviewed the agenda for carrying out this purpose. A list of individuals and participating agencies attending the scoping meeting is attached.

II. Overview of the Sector Planning Process

Steven Dopp, Senior Planner for the North Central Florida Regional Planning Council, presented an overview of the sector planning process. He emphasized that sector plans are an alternative to the development of regional impact process. He noted that the long-term master plan portion of the sector plan is reviewed as a comprehensive plan amendment using the state coordinated review process. Mr. Dopp concluded by stating that participating agencies should submit any comments and recommendations they have on the project in writing to the Council by October 14, 2013 and that the Council will forward their comments and recommendations to Plum Creek, Alachua County and the Florida Department of Economic Opportunity.

Mari Daniels, Alachua County Planning Department, gave a brief overview of the Alachua County Comprehensive Plan amendment process. She stated that Alachua County requires a separate preapplication conference for the comprehensive plan amendment for the long-term master plan in addition to the scoping meeting. She noted that a neighborhood meeting is also required before the comprehensive plan amendment is submitted to the County. She stated that the local government development orders for the detailed specific area plans are anticipated to be similar to development of regional impact local government development orders.

Mr. Koons noted that, unlike a development of regional impact, there will not be a formal sufficiency review process for the long-term master plan. Therefore, he noted, it is important that participating agencies state their comments and concerns regarding the sector plan during the meeting today. He further stated it is important that agencies in attendance submit any comments and recommendations they have on the sector plan to the Council no later than October 14, 2013.

III. Overview of the Project

Daniel Iacofano, Chief Executive Office, MIG, consultant for Plum Creek, gave an overview of public outreach process for the project which has occurred up to this point in time. He noted that Plum Creek, on its own accord, implemented a community process involving a community task force and a technical advisory group which consisted of many of the agencies in attendance at the scoping meeting. He further notes that the formal process consisted of two phases, the first being a community vision and goals phase which started in the spring of 2011 and ended in

the spring of 2012. He stated that the second phase, currently underway, is the preparation of the long-term master plan. He further stated that additional information on the process can be found on the Envision Alachua website ([www.envisionalachua.com](http://www.envisionalachua.com)).

Mr. Iacofano noted that, in addition to the community task force and the technical advisory group, Plum Creek has also been working with the Design Studio, the University of Florida, Santa Fe College and the Gainesville Area Chamber of Commerce in the development of the Sector Plan.

Tim Jackson of Plum Creek gave an overview of the long-term master plan. Mr. Jackson stated that the long-term master plan implements the two primary goals which came out of the community process, job creation and conservation. He noted that a secondary goal of the sector plan is to provide housing within the development area for the persons who work within the development area. He noted that the development area consists of 60,000 acres of the 65,000 acres of land within Alachua County owned by Plum Creek. He further noted that the lands located north and west of the City of Hawthorne are anticipated to be developed as urban-oriented mixed uses while the area generally near the City of Waldo and Lake Lochloosa will contain conservation-oriented uses. He noted that other lands are intended to be in rural and agricultural uses. He further noted that, taking into account existing conservation lands, the sector plan is anticipated to enhance the connection of conservation lands between Paynes Prairie and Lake Lochloosa as well as Ocala National Forest and Osceola National Forest.

Mr. Jackson stated that, as of today, approximately 22,800 acres of the development area are in a conservation easement. He further stated that approximately 36,000 acres are in an rural/agriculture use, of which approximately 1,200 acres are located within the Hawthorne Urban Reserve. Mr. Jackson stated that approximately 23,000 additional acres of the development area are anticipated to be placed in a conservation easement. He noted that approximately 12,000 acres are anticipated to be developed as urban uses. He further noted that the exact locations for the various uses have yet to be determined.

Mr. Jackson stated that the scoping meeting material developed by the Council and mailed to attendees as part of the meeting packet includes information on preliminary allowable land uses and intensities of use (see Appendix B). He noted that, should the sector plan be constructed to its maximum allowable use as suggested by the preliminary urban land use program, the project will result in 30,000 jobs. He further noted that if every person who lived within the planning area worked within the planning area, the residents would represent approximately 40 percent of the employment base. He stated that approximately 60 percent of the workforce will come from somewhere else, such as the City of Hawthorne and East Gainesville. He described the East Gainesville - Hawthorne development area as an Economic Development Corridor.

Mr. Koons asked if there were any questions regarding the scope, size and general uses depicted on the general framework map discussed by Mr. Jackson. No questions were raised.



IV. Local Government and Agency Comments on Relevant Planning Issues to be Addressed and the Data and Resources Available to Assist in the Preparation of the Sector Plan

Mr. Koons noted that this section of the meeting is to address the information requirements of the long-term master plan. He further stated that he will seek questions and comments on each item identified in the Synopsis of Sector Plan Requirements which is included in the meeting packet (see Appendix B).

A. Long-term Master Plan

1. General

Mr. Jackson stated that the development/construction phase of the planning area is currently estimated to be 50 years. Mr. Jackson further stated that the maximum population of the entire planning area is currently based upon the projected 10,500 dwelling units. He also noted that detailed specific area plans will be submitted to the County to develop phases of the planning area over time.

2. Framework Map (Generalized Land Use Map)

Mr. Koons stated that the framework map is to identify at a minimum, urban, agricultural, rural and conservation land uses. Mr. Koons referred meeting participants to page 14 of the meeting packet which is the preliminary Framework Map.

No questions or comments were raised under this item.

3. General Identification of:

a. Water Supplies Needed and Available Resources of Water, Including Water Resource Development, Water Supply Development Projects, Water Conservation Measures Needed to Meet Projected Demand

Steve Fitzgibbons, St. Johns River Water Management District, noted that the District is concerned about available water supplies and requested that this issue be addressed in the long-term master plan. He provided the applicant a list of issues that the District is requesting the applicant to address in the long-term master plan (see Appendix C).

Brad McDonald, CH2M Hill, consultant for the applicant, stated that the applicant will consult with the District regarding minimum flows and levels and regional water supply planning.

Mike Castine, Alachua County Growth Management, requested that the applicant consult with the City of Hawthorne regarding potential impacts to the City of Hawthorne water supply and water wells.

Chris Bird, Alachua County Environmental Protection Department, noted that one of the data sources the Department has identified is the Orange Creek Basin Water Management Action Plan. He stated that the sector plan should tie in to the Basin Management Action Plan. He noted that Orange Lake, Lake Lochloosa and Newnans Lake are classified as Impaired. He further noted that the Basin Management Action Plan will soon undergo an update process.

- b. Transportation Facilities to Serve the Development, Including Guidelines to be Used to Establish Each Modal Component Intended to Optimize Mobility

Marlie Sanderson, Director of Transportation Planning, North Central Florida Regional Planning Council, stated that regionally significant transportation facilities are identified in the North Central Florida Strategic Regional Policy Plan. He further stated that the regionally significant transportation facilities located within or adjacent to the planning area include State Road 20, State Road 26, State Road 121, U.S. Highway 301 and the CSX rail line adjacent to U.S. Highway 301. He further stated that the regional planning council will be concerned about potential impacts of the development to these regionally significant transportation facilities.

Terry McKloski of URS Corporation, consultant for the Florida Department of Transportation, asked if there could be a follow-up meeting to discuss transportation impacts.

Mr. Koons responded affirmatively.

Mr. McKloski stated that he would wait until the transportation meeting to raise further comments.

Mr. Koons encouraged Mr. McKloski to discuss the concerns the Florida Department of Transportation has regarding transportation at the scoping meeting today.

David Rae of URS Corporation requested to be a part of the Detailed Specific Area Plan process in order to investigate transportation impacts for the Detailed Specific Area Plans.

Mr. Rae stated that he was concerned about potential project impacts on developments located in surrounding areas and adjacent counties.

Mr. Koons stated that the applicant has previously agreed to use the five percent trip threshold used in the Development of Regional Impact transportation methodology to determine the transportation impact area of the development.

Mr. Jackson confirmed the use of the five percent trip threshold to determine the transportation impact area as well as the use of the statewide transportation model to determine impacts on other jurisdictions.

- c. Other regionally significant public facilities necessary to support the project and policies setting forth the procedures to mitigate project impacts on public facilities.

Vicki McGrath, Alachua County Public Schools, stated that the school district anticipates a need for an additional two to three elementary schools, one middle school and one high school.

Steven Dopp, Senior Planner, North Central Florida Regional Planning Council, stated that the New River Regional Landfill is a regional facility identified in the North Central Florida Strategic Regional Policy Plan and that the Council will be concerned about potential impacts to the landfill as a result of the development.

- d. Regionally Significant Natural Resources Within the Planning Area Based on the Best Available Data and Policies Setting Forth the Procedures for Protection or Conservation of Specific Resources Consistent with the Overall Conservation and Development Strategy for the Planning Area



Mr. Dopp commended the applicant on considering the concept of ecosystem/habitat linkages between the planning area, Osceola National Forest and Ocala National Forest. He stated that the Council will be concerned about potential adverse impacts of the sector plan on Natural Resources of Regional Significance. Mr. Dopp further stated that the North Central Florida Strategic Regional Policy Plan identifies and maps Natural Resources of Regional Significance. He noted that Natural Resources of Regional Significance located within the planning area include the Floridan Aquifer, stream-to-sink recharge areas, regionally significant wetlands, the Lochloosa Conservation Area, Gum Root Park, Austin Carey Memorial Forest, Paynes Prairie and Santa Fe Swamp.

Kris Cathey, Florida Fish and Wildlife Conservation Commission, stated that the long-term master plan should emphasize the ecological corridor linkages discussed by the applicant. She stated that the corridors as well as key habitat areas are identified in the State Wildlife Action Plan. She further stated that the Commission will be concerned about potential impacts to high priority habitats, including natural pinelands and interior wetlands. She further stated that information regarding these areas is available online.

Ms. Cathey further requested that the long-term master plan provide additional information regarding allowable high-intensity agriculture uses, if any, which are to be allowed within agricultural lands identified as conservation areas. Ms. Cathey also requested that the long-term master plan provide additional information regarding allowable low-intensity agricultural uses to be allowed within agricultural lands identified as conservation areas.

Mr. Bird stated that he wanted to emphasize the impaired waters issue he previously identified. He noted that while although the existing Orange Creek Basin Management Action Plan does not anticipate the sector plan, it does make reference to new development not further degrading existing impaired water systems. Therefore, Mr. Bird requested the applicant to address how the development will not further degrade the existing impaired water systems identified in the Orange Creek Basin Management Action Plan.

4. General Principles and Guidelines Addressing:

No questions or comments were raised under this item.

5. Identification of General Procedures and Policies to Facilitate Intergovernmental Coordination to Address Extrajurisdictional Impacts

No questions or comments were raised under this item.

V. Local Government and Agency Comments on Topic Areas Identified by Alachua County

Mari Daniels, Alachua County Growth Management, distributed a document prepared by Alachua County staff entitled, Data Resources for Reference in Preparation of Application for a Sector Plan by Plum Creek.

Ms. Daniels stated that this section of the meeting is to address the topic areas identified by the County for which it has requested additional information. The topic areas are listed in the item identified as County-Identified Topic Areas which is included in the meeting packet (see Appendix B).

Ken Zeichner, Principal Planner, Alachua County Growth Management, noted that the County Comprehensive Plan currently calls for most of the projected County growth and development to be located within the Urban Cluster and that the sector plan is located outside the Urban Cluster. He further stated he was concerned how the proposed development would impact the provision of services, fiscal impacts, as well as a variety of other issues as the sector plan appears to diverge from some of the fundamental principles of the County Comprehensive Plan.

Michael Drummond, Alachua County Environmental Protection Department, encouraged the applicant to coordinate with the Florida Division of Historical Resources, use their databases on existing known historical and archaeological sites. He further stated that the North Central Florida Regional Planning Council has a database of cemeteries located within Alachua County.

Mr. Dopp requested that the Applicant address affordable housing impacts. He recommended the use of the North Central Florida Regional Planning Council affordable housing methodology to assess affordable housing impacts. He stated that the Council's affordable housing methodology is a modified version of the East Central Florida Regional Planning Council affordable housing Impact methodology. He further stated that an analysis of affordable housing impacts should not occur in the long-term master plan, but should occur for the detailed specific area plans. He noted that the long-term master plan should include a commitment to address affordable housing impacts using the North Central Florida Regional Planning Council methodology.

VI. Permitting/Licensing Agency Comments on Development Information Required for Permits/Approvals

Mr. Koons asked if any of the permitting agencies had any comments at this time regarding this agenda item.

Mr. Fitzgibbons noted that the development will require a consumptive use permit.

Shannon White, U.S. Army Corps of Engineers, recommended that the applicant identify jurisdictional wetlands in either the long-term master plan or the detailed specific area plans. However, she advised identifying jurisdictional wetlands as part of the long-term master plan as this will assist the applicant to better identify the information needed for developing the detailed specific area plans.

Mr. Jackson suggested that it may be too early to identify jurisdictional wetlands as part of the long-term master plan. He stated that it may be appropriate to include a policy in the long-term master plan regarding how and when jurisdictional wetlands are to be mapped and included in the detailed specific area plans.

Mr. Rae stated that the applicant will need access permits to the Florida State Highway System from the Florida Department of Transportation.

Russell Simpson, Florida Department of Environmental Protection, stated that the project will require one or more National Pollution Discharge Elimination System permits as well as other permits issued by the Department. He provided the applicant a list of those permits (see Appendix C).



## VII. Public Comments

Mr. Koons stated that one citizen, Charles Lee of the Florida Audubon Society, had submitted a request to speak form.

Mr. Lee stated that Florida Audubon is favorably impressed with the identification of conservation lands to be protected by easements in the Farmton Plan, located in both Brevard and Volusia Counties. He recommended that the County and the applicant look at the Farmton Plan as a model for developing the Plum Creek long-term master plan. Mr. Lee suggested looking at a Volusia County Comprehensive Plan amendment for the Farmton Plan in particular for use as a model to be followed. Mr. Lee noted that the application of conservation easements in Volusia County was especially noteworthy and could be used as a model for the Plum Creek Sector Plan.

Mr. Lee also commented on water supply and water conservation. He recommended that Florida Friendly landscaping and the avoidance of traditional landscape irrigation systems as well as other water conservation techniques be included as policies and guiding principles in the long-term master plan.

Mr. Koons asked if any other member of the public wished to speak.

No additional members of the public indicated a desire to speak.

## VIII. Concluding Remarks

Mr. Koons asked meeting participants who have not yet signed the meeting attendance sheet to do so before leaving the meeting. Mr. Koons also stated that the summary of proceedings will be mailed to all meeting participants for their review. He requested the reviewers forward any clarifications and omissions to the Council for inclusion in the final version of the meeting summary. He further requested that any written comments or recommendations which member participants have be forwarded to the Council no later than October 14, 2013 and that the Council will forward all comments and recommendations it receives to Plum Creek, Alachua County and the Florida Department of Economic Opportunity. He further noted that the Council will be forwarding its recommendations to Plum Creek, Alachua County and the Florida Department of Economic Opportunity following the October 24, 2013 Council meeting.

The meeting adjourned at 11:04 a.m.



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## **AGENDA**

### **SCOPING MEETING**

#### **Plum Creek Sector Plan**

Gainesville Regional Utilities  
General Purpose Meeting Room  
301 SE 4th Avenue  
Gainesville, FL

September 23, 2013  
9:30 a.m.

- I. Opening Remarks, Agenda Review and Introductions
- II. Overview of Sector Planning Process
- III. Overview of Project
- IV. Local Government and Agency Comments on Relevant Planning Issues to be Addressed and the Data and Resources Available to Assist in the Preparation of the Sector Plan (see attached synopsis of sector plan requirements)
- V. Local Government and Agency Comments on Topic Areas Identified by Alachua County (see attached list of County-identified topic areas)
- VI. Permitting/Licensing Agency Comments on Development Information Required for Permits/Approvals
- VII. Public Comments
- VIII. Concluding Remarks



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## SYNOPSIS OF SECTOR PLAN REQUIREMENTS, SECTION 163.3245, FLORIDA STATUTES

### SCOPING MEETING

#### Plum Creek

- IV. Reviewing Agency Comments on Relevant Planning Issues to be Addressed and the Data and Resources Available to Assist in the Preparation of the Sector Plan
  - A. Long-term Master Plan
    - 1. General
      - a. Identification of the planning period including build-out date
      - b. Projected population within the planning area
      - c. Phasing/staging schedule, if applicable
    - 2. Framework Map (Generalized Land Use Map)
      - a. Urban, agricultural, rural and conservation land uses
      - b. Allowed uses in various parts of the planning area
      - c. Maximum and minimum densities and intensities of use
      - d. General development pattern in developed areas with graphic illustrations based on a hierarchy of places and functional place-making components

3. General Identification of:

- a. Water supplies needed and available resources of water, including water resource development, water supply development projects, water conservation measures needed to meet projected demand
- b. Transportation facilities to serve the development, including guidelines to be used to establish each modal component intended to optimize mobility
- c. Other regionally significant public facilities necessary to support the project and policies setting forth the procedures to mitigate project impacts on public facilities.
- d. Regionally significant natural resources within the planning area based on the best available data and policies setting forth the procedures for protection or conservation of specific resources consistent with the overall conservation and development strategy for the planning area.

4. General Principles and Guidelines Addressing:

- a. Development patterns, urban form and interrelationships between land uses
- b. The protection and, as appropriate, restoration and management of lands identified for permanent preservation through recordation of conservation easements consistent with s. 704.06, Florida Statutes
- c. Achieving a cleaner and healthier environment
- d. Limiting urban sprawl
- e. Providing a range of housing types
- f. Protecting wildlife and natural areas
- g. Advancing the efficient use of land and other resources
- h. Creating quality communities of a design that promotes travel by multiple transportation modes
- i. Enhancing prospects for the creation of jobs

5. Identification of general procedures and policies to facilitate intergovernmental coordination to address extrajurisdictional impacts.

B. Other Issues



## Appendix C

## Page #

- Letter from Alachua County—Comments on the Scoping Meeting Summary dated 10/14/13 to NCFRPC 13
- Data Resources compiled by Alachua County Staff for Reference In Preparation of Application for a Sector Plan by Plum Creek 15
- Putnam County's comments on Plum Creek Sector Plan (10/09/13) 24
- St. John's River Water Management District comments to NCFRPC dated 9/23/13 (email to Steve Dopp) regarding Plum Creek Sector Plan scoping meeting 26
- FDEP-Northeast District-Jacksonville comments regarding Plum Creek Scoping meeting Potential Permit Requirements and Staff comments 28
- Letter dated 10/16/13 from Florida Dept of Transportation to NCFRPC (Marlie Sanderson) regarding Plum Creek Sector Plan-Methodology Comments 30
- North Central Florida Regional Planning Council dated 10/24/13 regarding Plum Creek Sector Plan Scoping Meeting Recommendations 33
- Plum Creek Sector Plan Scoping Meeting—Excerpts from Applicant Handbook Materials 37



SKSD  
**ALACHUA COUNTY**  
**DEPARTMENT OF GROWTH MANAGEMENT**

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Gregory A. Ferrone  
Building Official

Benny Beckham  
Zoning Administrator

October 14, 2013

Mr. Scott R. Koons, AICP  
North Central Florida Regional Planning Council  
2009 NW 67<sup>th</sup> Place  
Gainesville, Florida 32653

Re: Alachua County Comments on the Scoping Meeting Summary

Dear Mr. Koons,

Alachua County has reviewed the Scoping Meeting Summary and has no comments on the summary. As concerns the Long Term Master Plan, we reiterate that the proposed Plum Creek Sector Plan appears to diverge from the County's current Comprehensive Plan framework and each of the County identified topic areas need to be considered as the Comprehensive Plan amendment is prepared.

In addition, as mentioned at the Scoping Meeting, the applicant needs to be aware of the Orange Creek Basin Water Management Action Plan. The Sector Plan will need to address how the proposed development will not further degrade the existing impaired water systems identified in this Action Plan.

Please contact Missy Daniels at 352-374-5249 or [mdaniels@alachuacounty.us](mailto:mdaniels@alachuacounty.us) if you have any questions.

Sincerely,

  
Steven Lachnicht, AICP  
Director

xc: Betty M. Baker, County Manager  
Richard Hedrick, Interim Assistant County Manager  
Dave Wagner, County Attorney  
Missy Daniels, Growth Management  
Chris Bird, Environmental Protection Department  
Michael Fay, Interim Public Works Director  
Ed Bailey, Chief, Fire Rescue  
Todd W. Powell, Plum Creek



NORTH CENTRAL FLORIDA  
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## Outline of Major Topic Areas

1. Future Land Use
2. Transportation
3. Capital Improvements Planning
4. Water Quality and Stormwater Maintenance
5. Wastewater
6. Water Supply Planning
7. Natural Resources
8. Recreation
9. Intergovernmental Coordination
10. Economic Development
11. Historic Preservation
12. Affordable Housing
13. Energy/Sustainability
14. Public Safety
15. Solid Waste



**DATA RESOURCES FOR REFERENCE IN PREPARATION OF APPLICATION FOR  
A SECTOR PLAN BY PLUM CREEK**

*Compiled by Alachua County Staff for Scoping Meeting on September 23, 2013*

*The following is a listing of data resources available to assist in the preparation of the Comprehensive Plan Amendment application for a Sector Plan by Plum Creek. This is not intended as an exhaustive list of resources, and other resources may be available and relevant. Most of the data resources identified herein are part of the supporting data and analysis for the Alachua County Comprehensive Plan. The information is organized by topic areas that will need to be addressed as part of the application.*

**GENERAL**

**Alachua County Comprehensive Plan 2011-2030**

[http://growth-management.alachuacounty.us/comprehensive\\_planning/documents/2011\\_2030\\_Comprehensive\\_Plan.pdf](http://growth-management.alachuacounty.us/comprehensive_planning/documents/2011_2030_Comprehensive_Plan.pdf)

*The Alachua County Comprehensive Plan is a set of principles, general strategies, goals, objectives, policies and maps, adopted by the County Commission, to guide growth and development, resource protection, and provision of public services and facilities in Alachua County. Amendments to the Plan shall be considered based on these adopted provisions and shall be consistent with all Elements of the Plan and the applicable requirements of Florida Statutes Chapter 163 Part II. See attached Table of Contents for the Comprehensive Plan showing the adopted Elements with page numbers and maps, Appendix A.*

**Evaluation and Appraisal Report on the Alachua County Comprehensive Plan 2001-2020, as adopted by the Board of County Commissioners on August 11, 2009 (2009 EAR on Comprehensive Plan).**

[http://growth-management.alachuacounty.us/comprehensive\\_planning/comprehensive\\_plan\\_update/documents/EAR\\_Draft\\_Document\\_for\\_8-11-09\\_BoCC\(2\).pdf](http://growth-management.alachuacounty.us/comprehensive_planning/comprehensive_plan_update/documents/EAR_Draft_Document_for_8-11-09_BoCC(2).pdf)

*The 2009 Evaluation and Appraisal Report on the County's Comprehensive Plan provides data and analysis on a variety of issues, and served as the basis for the most recent update of the Alachua County Comprehensive Plan in 2011. Some of the topic areas addressed in the EAR include the following (also see attached Table of Contents for the EAR showing all topic areas, maps, and figures with page numbers, Appendix B):*

Land Use & Population Analysis\* (Ch. 3, pg. 33-50)  
Future Land Use (see EAR Table of Contents in Appendix B for various land use issues and analysis)  
Land Use/Transportation Linkages (pgs. 173-188)  
Natural Resources, generally (pgs. 98-104; 200-259)  
Water Supply and Water Quality (pgs. 203-204; 207-227; 230)  
Potable Water/Wastewater (pgs. 205-206; 228-229; 230)  
Air Quality (pgs. 200-203)

Recreation (pgs. 119-123)  
Intergovernmental Coordination (pgs. 105-114)  
Economic Development (pgs. 133-151; 156-158)  
Historic Preservation (pgs. 159-161)  
Affordable Housing (pgs. 162-172)  
Energy (pgs. 266-270)  
Solid Waste (pgs. 152-155)  
Public Safety (pgs. 124-129)  
Capital Improvements (pgs. 116-118)

*\* The "Medium" population projections used in the 2009 EAR were from March 2009. The analysis in the EAR included projections of unincorporated area population derived from the March 2009 countywide projections. The most recent Medium population projections from March 2013 indicate that the year 2035 population of Alachua County is projected to be about 33,000 less than the 2009 Medium projections.*

## Supporting Data and Analysis for the 2011-2030 Alachua County Comprehensive Plan Update Based on the 2009 Evaluation and Appraisal Report (2011-2030 Comprehensive Plan Data and Analysis)

[http://growth-management.alachuacounty.us/comprehensive\\_planning/documents/Data\\_and\\_Analysis\\_CP\\_2011\\_2030.pdf](http://growth-management.alachuacounty.us/comprehensive_planning/documents/Data_and_Analysis_CP_2011_2030.pdf)

*This is the supporting data and analysis document for the most recent update of the Alachua County Comprehensive Plan based on the EAR in 2011. The document is organized by Plan Element (if the applicable Element was updated), and supplements the Evaluation and Appraisal Report as supporting data and analysis for the 2011 Plan update. Data and analysis related to the following Plan Elements are included with reference to the page number where that Element starts (also see attached Table of Contents for the Supporting Data and Analysis for the 2011 Comprehensive Plan Update, Appendix C).*

Community Health Element (pg. 1)

Energy Element (pg. 8)

Future Land Use Element (pg. 17)

Housing Element (pg. 45)

Potable Water & Sanitary Sewer Element (pg. 49)

Solid Waste Element (pg. 53)

Stormwater Element (pg. 57)

Conservation and Open Space Element (pg. 61)

Recreation Element (pg. 85)

Intergovernmental Coordination Element (pg. 124)

Capital Improvements Element (pg. 132)

Economic Element (pg. 135)

## Supporting Data and Analysis for the 2001-2020 Alachua County Comprehensive Plan update based on the 1998 Evaluation and Appraisal Report (2001-2020 Comprehensive Plan Data and Analysis).

[http://growth-management.alachuacounty.us/comprehensive\\_planning/documents/Data\\_and\\_Analysis\\_CP\\_2001\\_2020.pdf](http://growth-management.alachuacounty.us/comprehensive_planning/documents/Data_and_Analysis_CP_2001_2020.pdf)

*This document is the data and analysis which served as a basis for the update of the Alachua County Comprehensive Plan based on the 1998 Evaluation and Appraisal Report. The amendments updating the Plan based on the 1998 EAR were adopted in 2002 and went into effect in 2005 following resolution of legal challenges. This document is organized by Plan Element.*

## Alachua County Unified Land Development Code (ULDC)

[http://growth-management.alachuacounty.us/land\\_development\\_code/documents/Unified\\_Land\\_Development\\_Code.pdf](http://growth-management.alachuacounty.us/land_development_code/documents/Unified_Land_Development_Code.pdf)

*The Unified Land Development Code (ULDC) is a collection of development regulations that implement the policies of the Comprehensive Plan. New development in the unincorporated area is required to meet the standards of the ULDC. Chapter 402 Article 7 identifies the procedures for Comprehensive Plan Amendments. Chapter 402 Article 20 identifies the specific requirements for Sector Plans and related applications for Comprehensive Plan Amendments, including requirements for internal consistency and supporting data and analysis.*

## POPULATION

**Alachua County "Medium" Population Projections: 2015-2040, from the State Office of Economic and Demographic Research, March 2013.**

[http://edr.state.fl.us/Content/population-demographics/data/Medium\\_Projections.pdf](http://edr.state.fl.us/Content/population-demographics/data/Medium_Projections.pdf)

*Countywide "Medium" population projections through the year 2040.*



## Florida Population Estimates for Counties and Municipalities: April 1, 2012

[http://edr.state.fl.us/Content/population-demographics/data/2012\\_Pop\\_Estimates.pdf](http://edr.state.fl.us/Content/population-demographics/data/2012_Pop_Estimates.pdf)

*This document provides the most recent estimates of current population for Florida Counties and municipalities (including Alachua County and its municipalities).*

## TRANSPORTATION

### 2009 EAR on Comprehensive Plan (see link and description under "General" header on page 1)

*Topics addressed in the EAR include "Land Use and Transportation" beginning on pg. 173.*

### FDOT Strategic Intermodal System Strategic Plan, updated 2010

<http://www.dot.state.fl.us/planning/sis/Strategicplan/>

### FDOT 5 Year Work Program, 2008-2013 and 2014-2018

<http://www2.dot.state.fl.us/fmsupportapps/workprogram/WorkProgram.aspx>

### FDOT District 2 Level of Service Report, 2011

<http://www.dot.state.fl.us/planning/systems/sm/los/districts/district2/>

### Florida Greenways and Trails System Plan 2013-2017

[http://www.dep.state.fl.us/gwt/FGTS\\_Plan/PDF/FGTS\\_Plan\\_2013-17\\_publication.pdf](http://www.dep.state.fl.us/gwt/FGTS_Plan/PDF/FGTS_Plan_2013-17_publication.pdf)

### Gainesville Year 2035 Long Range Transportation Plan, 2010

<http://ncfrpc.org/mtpo/LRTP.html>

## NATURAL RESOURCES

### 2009 EAR on Comprehensive Plan (see link and description under "General" header on page 1)

*Topics addressed in the EAR include:*

- *Connectivity of Preservation and Strategic Ecosystem Areas (Critical Ecological Corridors): pg. 98ff.*
- *Air Quality: pg. 200ff.*
- *Water Resources, including discussion of surface water, groundwater, regional water supply, and water supply concurrency: pg. 203ff.*

### 2011-2030 Comprehensive Plan Data and Analysis by Element (see link and description under "General" header on page 2)

- *See Conservation and Open Space Element Data and Analysis beginning on pg. 61. Topics addressed include:*
  - *"Water Resources", including discussion of surface water, groundwater, regional water supply, and water supply concurrency, beginning page 61*
  - *"Connectivity of Preservation and Strategic Ecosystem Areas - Ecological Corridors", beginning on pg. 70.*
  - *"Air Quality", beginning on page 75.*

**2001-2020 Comprehensive Plan Data and Analysis by Element (see link and description under "General" header on page 2)**

*See Conservation and Open Space Element Data and Analysis*

**Alachua County Critical Ecological Corridors Map (Map 5, Conservation and Open Space Element of Alachua County Comprehensive Plan)**

[http://growth-management.alachuacounty.us/gis/compplanmaps/Critical Ecological Corridors.pdf](http://growth-management.alachuacounty.us/gis/compplanmaps/Critical_Ecological_Corridors.pdf)

*See Comprehensive Plan Objective 6.3 ("Linked Open Space Network") and subsequent policies of the Conservation and Open Space Element relating to the Critical Ecological Corridors Map.*

**Alachua County Ecological Inventory Project, prepared by KBN, a Golder Associates Company, 1996.**

[http://growth-management.alachua.fl.us/comprehensive\\_planning/natural\\_and\\_historic\\_resources/documents/Alachua%20County%20Ecological%20Inventory%20Report.pdf](http://growth-management.alachua.fl.us/comprehensive_planning/natural_and_historic_resources/documents/Alachua%20County%20Ecological%20Inventory%20Report.pdf)

*This document provides an inventory and generalized mapping of significant natural areas in Alachua County. It is a basis for the "Strategic Ecosystem" designation and related policies in the Alachua County Comprehensive Plan.*

**Alachua County Strategic Ecosystems Map (Map 4, Conservation and Open Space Element of Alachua County Comprehensive Plan)**

[http://growth-management.alachuacounty.us/gis/compplanmaps/Strategic Ecosystems.pdf](http://growth-management.alachuacounty.us/gis/compplanmaps/Strategic_Ecosystems.pdf)

*See Comprehensive Plan Objective 4.10 and subsequent policies of the Conservation and Open Space Element relating to Strategic Ecosystems.*

**Alachua County Floridan Aquifer High Recharge Area Map (Map 2, Conservation and Open Space Element of Alachua County Comprehensive Plan)**

[http://growth-management.alachuacounty.us/gis/compplanmaps/Floridan Aquifer High Recharge Area Map.pdf](http://growth-management.alachuacounty.us/gis/compplanmaps/Floridan_Aquifer_High_Recharge_Area_Map.pdf)

*See Comprehensive Plan Objective 4.5.3 through 4.5.6 of the Conservation and Open Space Element relating to the Alachua County Floridan Aquifer High Recharge Area Map.*

**Alachua County Wetlands & Floodplains Map (Map E, Future Land Use Element of Alachua County Comprehensive Plan)**

[http://growth-management.alachuacounty.us/gis/compplanmaps/wetlands\\_floodplains.pdf](http://growth-management.alachuacounty.us/gis/compplanmaps/wetlands_floodplains.pdf)

*This map, adopted in the Comprehensive Plan as Map E of the Future Land Use Element Map Series, provides for generalized identification of 100-year floodplains and wetlands. See policies in the Alachua County Comprehensive Plan Conservation and Open Space Element relating to protection of wetlands and floodplain areas. Wetland locations shown on this map are based on a composite of several datasets, and the actual presence and location of wetlands is subject to ground-truthing.*



## **Alachua County Water Conservation Initiative Report, 2010**

<http://www.alachuacounty.us/Depts/EPD/Documents/WaterResources/WaterConservationInitiativeReport.pdf>

*The report identifies opportunities for more effective local government roles in increasing water conservation such as land use and low impact development incentives. It recognizes that effective water conservation requires cooperation, collaboration, and communication among citizens and all levels of government, business, and non-governmental organizations.*

## **Orange Creek Basin Management Action Plan**

<http://www.dep.state.fl.us/water/watersheds/docs/bmap/AdoptedOrangeCrkBMAP.pdf>

*The Orange Creek Basin Management Action Plan was developed for the Implementation of Total Maximum Daily Loads adopted by the Florida Department of Environmental Protection for Newnans Lake, Orange Lake, Lake Wauberg, Hogtown Creek, Sweetwater Branch, Tumblin Creek, and Alachua Sink.*

## **Florida Ecological Greenways Network Critical Linkages & Prioritization Results, 2008.**

[http://www.fgdl.org/metadataexplorer/full\\_metadata.jsp?docId=%7BFCD0733C-F359-4B7C-B420-FD26D4228220%7D&loggedIn=false](http://www.fgdl.org/metadataexplorer/full_metadata.jsp?docId=%7BFCD0733C-F359-4B7C-B420-FD26D4228220%7D&loggedIn=false)

*Link to GIS data and related metadata for the Florida Ecological Greenways Network.*

## **St. Johns River Water Management District Water Supply Plans**

<http://floridaswater.com/watersupply/planning.html>

*This is a link to general information about the ongoing St. Johns River Water Management District water supply planning process, including information for "Region 1", which includes Alachua, Baker, Bradford, Clay, Duval, Flagler, Nassau, Putnam and St. Johns counties. Water supply planning for this area is conducted as part of the North Florida Regional Water Supply Partnership (see link below) in coordination with the Suwannee River Water Management District. See related policies on water supply planning in the Alachua County Comprehensive Plan, Conservation and Open Space Element.*

## **North Florida Regional Water Supply Partnership**

<http://northfloridawater.com/>

*This is a link to information about the ongoing water supply planning efforts of the North Florida Regional Water Supply Partnership. The partnership includes the St. Johns River and Suwannee River water management districts, FDEP, and local governments, and intended to formalize coordination of water resource management in north Florida. See related policies on water supply planning in the Alachua County Comprehensive Plan, Conservation and Open Space Element.*

## **RECREATION**

### **2009 EAR on Comprehensive Plan (see link and description under "General" header on page 1)**

*Topics include "Recreation Facilities Level of Service and Intergovernmental Coordination", beginning on page 119.*



**2011-2030 Comprehensive Plan Data and Analysis by Element (see link and description under “General” header on page 2)**

*See Recreation Element Data and Analysis beginning on pg. 85, including analysis of the geographic accessibility of activity-based park facilities, including those owned or operated by the County, municipality, school board, and non-profit organizations.*

**Alachua County Recreation Facilities Level of Service Current Estimates and Projections**

*The most current level of service data for Alachua County activity-based and resource-based recreation facilities is available from the Alachua County Parks and Recreation Division.*

**Alachua County Recreation Master Plan, Phases I and II.**

<http://www.alachuacounty.us/Depts/PW/parksAndRecreation/Pages/CountywideRecreationMasterPlan.aspx>

**INTERGOVERNMENTAL COORDINATION**

**2009 EAR on Comprehensive Plan (see link and description under “General” header on page 1)**

*Topics in the EAR include “Comprehensive Plan and Countywide Visioning & Planning Process”, beginning on page 105.*

*As stated in the 2005 Countywide Vision and Conceptual Land Use Plan for the unincorporated areas of the County, “The plan captures the common goals articulated by each municipality to protect environmentally sensitive areas, preserve the unique identity of each community, direct future growth into existing urbanized areas, prevent inefficient, sprawling development between one community and the next, and preserve the rural character of the county. It also articulates specific recommendations for the character of development and preservation lands in the unincorporated areas.” See related policies in the Alachua County Comprehensive Plan Intergovernmental Coordination Element*

**2011-2030 Comprehensive Plan Data and Analysis by Element (see link and description under “General” header on page 2)**

*See Intergovernmental Coordination Element Data and Analysis beginning on pg. 124, which provides information about the Countywide Visioning and Planning Process.*

**Alachua County Annexation Reserve and Extra-Territorial Areas Map - updated in 2011.**

[http://growth-management.alachuacounty.us/gis/compplanmaps/Reserve\\_Areas\\_2011.pdf](http://growth-management.alachuacounty.us/gis/compplanmaps/Reserve_Areas_2011.pdf)

*Map adopted as “Map 1” of Alachua County Comprehensive Plan Intergovernmental Coordination Element.*

**ECONOMIC DEVELOPMENT**

**2009 EAR on Comprehensive Plan (see link and description under “General” header on page 1)**

*Topics include “Economic Development”, beginning on page 133.*

**2011-2030 Comprehensive Plan Data and Analysis by Element (see link and description under "General" header on page 2)**

*See Economic Element Data and Analysis beginning on page 135.*

## **HISTORIC PRESERVATION**

**2009 EAR on Comprehensive Plan (see link and description under "General" header on page 1)**

*Topics include "Historic Preservation", beginning on page 159.*

**Historic Structures Survey of Unincorporated Alachua County, prepared by Quatrefoil Consulting, 2000.**

<http://growth-management.alachua.fl.us/histstruct/infosys/>

*This survey documents almost 1000 historic structures, bridges and cemeteries in the County. The "Interactive GIS" link allows search of the data by Section, Township and Range. The 2000 Historic Survey recommended the Rural Clusters of Evinston, Rochelle, Grove Park and Island Grove to be nominated as Historic Districts. Survey funding provided by the Florida Department of State.*

**Old Florida Heritage Highway, a state scenic byway partnership with Florida DOT.**

[www.scenicus441.com](http://www.scenicus441.com)

*Designated a state scenic byway in June 2001, US 441 and several County roads around Paynes Prairie, Micanopy and Cross Creek are promoted for heritage tourism and include efforts by a new citizen support organization.*

## **AFFORDABLE HOUSING**

**2009 EAR on Comprehensive Plan (see link and description under "General" header on page 1)**

*Topics in the EAR include "Housing", beginning on page 162.*

**2011-2030 Comprehensive Plan Data and Analysis by Element (see link and description under "General" header on page 2)**

*See Housing Element Data and Analysis beginning on page 45.*

**Alachua County State Housing Initiatives Partnership (SHIP) Program Local Housing Assistance Plan, State Fiscal Years 2011-2012, 2012-2013, and 2013-2014.**

[http://growth-management.alachuacounty.us/formsdocs/H\\_SHIP\\_LHAP.pdf](http://growth-management.alachuacounty.us/formsdocs/H_SHIP_LHAP.pdf)

**Alachua County Department of Growth Management, *Affordable Housing Needs in Alachua County*, April 2008.**

**Florida Housing Data Clearinghouse, Shimberg Center for Affordable Housing, University of Florida.**

<http://flhousingdata.shimberg.ufl.edu/>

## **ENERGY/SUSTAINABILITY**

**2009 EAR on Comprehensive Plan (see link and description under "General" header page 1)**

*Topics in the EAR include "Energy", beginning on page 266, and "Land Use, Transportation, and Energy Linkage" beginning on page 184.*

**2011-2030 Comprehensive Plan Data and Analysis by Element (see link and description under "General" header on page 2)**

*See Energy Element Data and Analysis beginning on page 8.*

**Alachua County Energy Conservation Strategies Commission Executive Summary and Final Report. December, 2008.**

<http://issuu.com/msexton/docs/ecscfinalreport>

*This report contains analysis on a wide range of energy-related issues, with related recommendations and implementation strategies for energy resilience and sustainability in Alachua County.*

## **SOLID WASTE**

**2009 EAR on Comprehensive Plan (see link and description under "General" header on page 1)**

*Topics in the EAR include "Recycling and Waste Alternatives", beginning on page 152.*

**2011 Comprehensive Plan Data and Analysis by Element (see link and description under "General" header on page 2)**

*See Solid Waste Element Data and Analysis beginning on page 53.*

## **PUBLIC SAFETY**

**2009 EAR on Comprehensive Plan (see link and description under "General" header on page 1)**

*Topics in the EAR include "Public Safety", beginning on page 124.*

**Alachua County Fire and Emergency Medical Services Performance Update; prepared by Emergency Services Consulting and the Alachua County Fire Rescue Department; December 2012.**

*Available from Alachua County Fire Rescue Department.*

## **STORMWATER MANAGEMENT**

**2011-2030 Comprehensive Plan Data and Analysis by Element (see link and description under "General" header on page 2)**

*See Stormwater Element Data and Analysis beginning on page 57.*



## Stormwater Master Plan, 2010

<http://www.alachuacounty.us/Depts/PW/engineering/stormwaterManagementProgram/SWMasterPlan/Pages/StormwaterMasterPlan.aspx>

*This document provides data and analysis in support of a Stormwater Management Program for the unincorporated areas of Alachua County.*

## CAPITAL IMPROVEMENTS

### 2009 EAR on Comprehensive Plan (see link and description under "General" header on page 1)

*See Chapter 5 "General Levels of Service Analysis", beginning on page 74. This Chapter provides a generalized analysis of the adopted and actual levels of service for various public facilities including transportation, recreation, potable water and sanitary sewer, public school facilities, solid waste, and stormwater management. Note, that this data is from 2009 and there may be updated data available in some cases from applicable departments or agencies.*

### 2011-2030 Comprehensive Plan Data and Analysis by Element (see link and description under "General" header on page 2)

*See Water Supply Concurrency discussion on page 50, and Recreation Level of Service and capital facilities planning discussion on page 85.*

### Comprehensive Plan Public School Facilities and Capital Improvements Element Updates, adopted August 27, 2013

<http://meetingdocs.alachuacounty.us/documents/bocc/agendas/2013-08-27/EC3081B5-21F7-49D8-8587-E670CE91CE0D-F9E0AFBC-26DC-4A6B-9C09-902F36DEC129.HTM>

*Information on amendments to the Public School Facilities Element adopted in August 2013, which revised policies relating to the public school concurrency review process, level of service standards, proportionate share mitigation, clarification of terminology, and other amendments to comply with the Community Planning Act of 2011; and related amendments to the Capital Improvements Element policies. The adopted Public School Facilities Element in the Alachua County Comprehensive Plan also includes goals, objectives, and policies relating to coordination of long range land use and school capacity planning.*

PUTNAM COUNTY  
PLANNING & DEVELOPMENT SERVICES

SKS

P. O. Box 1486  
Palatka, FL 32178-1486  
Fax: 386-329-1213  
Email: [pzb@putnam-fl.com](mailto:pzb@putnam-fl.com)



Planning: 386-329-0491  
Zoning: 386-329-0316  
Building: 386-329-0307  
Codes Enforcement: 386-329-0317  
In FL Toll Free: 1-800-432-0364

October 9, 2013

Scott R. Koons, Executive Director  
North Central Florida regional Planning Council  
2009 NW 67<sup>th</sup> Place  
Gainesville, Florida 32653

NORTH CENTRAL FLORIDA  
RECEIVED

OCT 15 2013

REGIONAL PLANNING COUNCIL

RE: Plum Creek Sector Plan

Dear Mr. Koons:

Thank you for the opportunity to participate in Scoping Meeting for the Plum Creek Sector Plan in Alachua County. Putnam County has reviewed the Draft Summary of Proceedings for the Sector Plan Scoping Meeting. The County is in agreement with the draft summary. Regarding the long-term master plan Putnam County offers the following comments and recommendations.

Putnam County's primary interest is in the procedures and policies that will be in place to facilitate intergovernmental coordination to address extra-jurisdictional impacts from the land uses and development of the Plum Creek Sector Plan. Because of the proposed 50 year build-out and that statutorily detailed specific plans are approved by issuance of a local development order, the coordination process should not only encompass the long range plan incorporation into the local government comprehensive plan but also provide opportunity to adequately address extra-jurisdictional impacts during the specific plan approval process. It is the County's desire to see a specific process set forth in policy(ies) that would guarantee that any significant adverse impacts on adjacent local government resulting from development of the Sector Plan are adequately identified and mitigated.

The intergovernmental Coordination Element of the adopted Alachua County Comprehensive Plan contains Policy 1.1.4 which states:

Alachua County shall develop with the North Central Regional Planning Council, the Florida Department of Transportation, and the cities of Alachua, Archer, Gainesville, Hawthorn, High Springs, LaCrosse, Micanopy, Newberry, and Waldo; Bradford, Gilchrist, Levy, Marion, and Putnam Counties; Northeast Florida Regional Planning Council, and Withlacoochee Regional Planning Council coordination mechanisms to address inter-jurisdictional comprehensive planning issues.

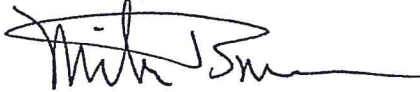
Putnam County is not aware that this coordination mechanism presently exists. The Plum Creek Sector Plan provides an opportunity for the various parties to come together to develop the coordination mechanisms for inter-jurisdictional planning issues both for the Sector Plan and the Comprehensive Plan.

Mr. Scott Koons  
Plum Creek Sector Plan  
Page 2

Putnam County is concerned with any impacts which may adversely impact the county, but the primary areas of concern are transportation impacts especially related to SR 20 and SR 26, groundwater withdrawals which could adversely impact the county and impact on recreational resources in the county.

Putnam County looks forward to working with all parties through the approval process of the Plum Creek Sector Plan. If you desire any clarification regarding this recommendation, please feel free to contact me and (386) 329-1293 or at [mike.brown@putnam-fl.com](mailto:mike.brown@putnam-fl.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Mike Brown', with a long horizontal flourish extending to the right.

Michael Brown  
Planner

cc: Ana Richmond, FDEO  
Brian Teeple, NEFRC  
Ed Lehman, NEFRC  
Mari Daniels, Alachua County Growth Management  
Richard Prindville, FDOT  
Steve Dopp, NCFRPC  
Todd Powel, Plum Creek



## Steve Dopp

---

**From:** Steve Fitzgibbons [SFitzgibbons@sjrwmd.com]  
**Sent:** Monday, September 23, 2013 2:10 PM  
**To:** Steve Dopp  
**Subject:** RE: Plum Creek Sector Plan Scoping Meeting, 9:30 a.m., September 23, 2013  
**Attachments:** Planning issues.docx

Steve,

As discussed at today's scoping meeting, attached to this email is the list of general planning issues for consideration.

Thank you,  
Steve

Steven Fitzgibbons, AICP  
Intergovernmental Planner  
Office of Communications and Intergovernmental Affairs  
St. Johns River Water Management District  
P.O. Box 1429  
Palatka, FL 32178  
Office (386) 312-2369  
E-mail: [sfitzgibbons@sjrwmd.com](mailto:sfitzgibbons@sjrwmd.com)  
Website: [floridaswater.com](http://floridaswater.com)  
Social media: [Newsletter](#), [Facebook](#), [Twitter](#), [You Tube](#)

---

**From:** Steve Dopp [mailto:[dopp@ncfrpc.org](mailto:dopp@ncfrpc.org)]  
**Sent:** Monday, September 09, 2013 3:09 PM  
**To:** [ana.richmond@deo.myflorida.com](mailto:ana.richmond@deo.myflorida.com); [bbaker@alachuacounty.us](mailto:bbaker@alachuacounty.us); [brad\\_carter@bradfordcountyfl.gov](mailto:brad_carter@bradfordcountyfl.gov); [pzb@putnam-fl.com](mailto:pzb@putnam-fl.com); [bteeple@ncfrpc.org](mailto:bteeple@ncfrpc.org); [micanopytown@bellsouthfl.com](mailto:micanopytown@bellsouthfl.com); [cbird@alachuacounty.us](mailto:cbird@alachuacounty.us); [fwcconservationplanningservices@myfwc.com](mailto:fwcconservationplanningservices@myfwc.com); Craig Parenteau; [Darrell.Smith@FreshFromFlorida.com](mailto:Darrell.Smith@FreshFromFlorida.com); [david\\_rae@urscorp.com](mailto:david_rae@urscorp.com); [dww@alachuacounty.us](mailto:dww@alachuacounty.us); Deborah Leistner; [ecb@alachuacounty.us](mailto:ecb@alachuacounty.us); [evause@cityofhawthorne.net](mailto:evause@cityofhawthorne.net); [bredfeldea@cityofgainesville.org](mailto:bredfeldea@cityofgainesville.org); [jhays@alachuacounty.us](mailto:jhays@alachuacounty.us); [Jillaine.owens@dep.state.fl.us](mailto:Jillaine.owens@dep.state.fl.us); Kim Worley; Kraig McLane; Laura ; [lee.niblock@marioncountyfl.org](mailto:lee.niblock@marioncountyfl.org); Mari Daniels; [MikeD@alachuacounty.us](mailto:MikeD@alachuacounty.us); Michael J. Fay; [moehلمان@wrpc.cc](mailto:moehلمان@wrpc.cc); [paul\\_myers@doh.state.fl.us](mailto:paul_myers@doh.state.fl.us); Ralph Hilliard; [randal\\_andrews@bradfordcountyfl.gov](mailto:randal_andrews@bradfordcountyfl.gov); [rich.budell@freshfromflorida.com](mailto:rich.budell@freshfromflorida.com); [huttonrh@gru.com](mailto:huttonrh@gru.com); [rleary@putnam-fl.com](mailto:rleary@putnam-fl.com); [rose.fagler@plumcreek.com](mailto:rose.fagler@plumcreek.com); [citymgr@cityofgainesville.org](mailto:citymgr@cityofgainesville.org); [russell.simpson@dep.state.fl.us](mailto:russell.simpson@dep.state.fl.us); [sdarnell@alachuasheriff.org](mailto:sdarnell@alachuasheriff.org); [samuel.martsof@marioncountyfl.org](mailto:samuel.martsof@marioncountyfl.org); [compplans@freshfromflorida.com](mailto:compplans@freshfromflorida.com); Sheena Chin-Green; Steve Fitzgibbons; [slachnicht@alachuacounty.us](mailto:slachnicht@alachuacounty.us); [pubwrk@cityofgainesville.org](mailto:pubwrk@cityofgainesville.org); [Terry\\_McKloski@URSCorp.com](mailto:Terry_McKloski@URSCorp.com); [thomas.hill@dot.state.fl.us](mailto:thomas.hill@dot.state.fl.us); [timjacksonconsult@gmail.com](mailto:timjacksonconsult@gmail.com); [timothy.parsons@dos.myflorida.com](mailto:timothy.parsons@dos.myflorida.com); [todd.powell@plumcreek.com](mailto:todd.powell@plumcreek.com); [tracy.suber@fldoe.org](mailto:tracy.suber@fldoe.org); [vicki.mcgrath@sbac.edu](mailto:vicki.mcgrath@sbac.edu)  
**Cc:** Scott Koons; Marlie Sanderson  
**Subject:** Plum Creek Sector Plan Scoping Meeting, 9:30 a.m., September 23, 2013

In accordance with the provisions of Section 163.3245(2), Florida Statutes, a scoping meeting for the above-referenced Sector Plan has been scheduled for September 23, 2013 at 9:30 a.m.

The meeting will be held at the following location (see attached map):

Gainesville Regional Utilities  
General Meeting Room  
301 SE 4th Avenue  
Gainesville, FL

**Water supply planning issues related to Section 163.3245(3)(a)(2), F.S.:**

1. Identify projected potable and nonpotable water demand.
2. Identify water conservation measures that will be implemented to will reduce potable and nonpotable water demand.
3. Identify potable and nonpotable water sources to meet projected water demand.
  - A. Identify existing (if any) potable and nonpotable water sources.
  - B. Identify any planned water resource development or water supply development projects that will be implemented.

**Water supply planning issues related to Section 163.3245(3)(a)(4), F.S.:**

4. Anticipated potable and nonpotable water supply entities.
5. Anticipated potable and nonpotable water service areas.
6. Implementation of nonpotable water distribution systems.

**Other issues related to water supply planning for consideration:**

7. Coordination of any water resource development or water supply development projects with SJRWMD's and/or SRWMD's regional water supply plans.  
<http://northfloridawater.com/>
8. Some land may be within areas where proposed withdrawals of groundwater may affect minimum flows and levels (MFLs) set by either SJRWMD or SRWMD.  
<http://floridaswater.com/minimumflowsandlevels/>  
<http://www.srwmd.state.fl.us/index.aspx?NID=55>
9. Areas shown on LTMP framework map located within SRWMD and SJRWMD. Joint consumptive use permit (CUP) review may be required depending on water supplier and water source.

**Issues related to natural resources, wetlands, and land management**

10. Address sections 163.3245(3)(a)(5) and (6), F.S.
11. Development guidelines relative to wetlands and surface waters outside designated conservation areas.
12. Newnans Lake and Lochlossa Lake TMDLs (TN and TP, and nutrients).
13. OFWs (e.g., Lochloosa Lake, Orange Lake).
14. Some LTMP land areas are adjacent to or near SJRWMD owned and managed land areas that are managed with natural resource land management practices, including prescribed fire. Address development guidelines relative to the proximity of SJRWMD owned and managed lands, including firewise principals.



## POTENTIAL PERMITS REQUIRED

### PLUM CREEK SCOPING MEETING

Permit Required	Permit Authority
Environmental Resource Permits would be required for Wetland filling, Road access, & Storm Water (impervious area increase, treatment, attenuation and floodplain regulation)	St. Johns River Water Management District
Notice of Intent to Use the Multi-Sector Generic Permit for Stormwater Discharge Associated with Industrial Activity. (NPDES Stormwater Program)	Florida Department of Environmental Protection (DEP)
Notice of Intent to Use the Generic Permit for Stormwater Discharge from large and Small Construction Activities (NPDES Stormwater Program)	Florida Department of Environmental Protection (DEP)
Site Clearing & Grubbing Permit	St. Johns River Water Management District
Waste Water System/Facility (Water Reclamation Facility)	Florida Department of Environmental Protection, Northeast District
Consumptive Water Use Permit	St. Johns River Water Management District
Permit to Construct Potable Water System for Non-transient Non-Community Public Water System (Drinking Water Facility/Water Treatment Plant)	Florida Department of Environmental Protection Northeast District
Irrigation Well-Drilling Permit	St. Johns River Water Management District
Test/Potable Well Drilling Permit	St. Johns River Water Management District
Building Permit	County Building Inspection Department
Rail Spur construction	FDOT
DOT Transportation Improvements	FDOT
Certificate of Land Development Regulation Compliance pursuant to Section 14.1-14.4 of the Land Development Code	County
Septic System Permit	Florida Department of Health County Office
Solid Waste Permit could be required if end user is responsible for waste disposal site	Florida Department of Environmental Protection Northeast District
Air Permit(s) could be required by end user (Only major emission sources require Title V permit =100 tons per year of regulated pollutants)	Florida Department of Environmental Protection Northeast District

# Northeast District Development of Regional Impacts (DRI) Review Response

SUBJECT: Plum Creek Scoping Meeting – September 23

<i>Please contact Russell Simpson at (904) 256-1653 or <a href="mailto:Russell.Simpson@dep.state.fl.us">Russell.Simpson@dep.state.fl.us</a> if further assistance is required.</i>	
Program/Reviewer	Staff Comments
<b><u>Air</u></b>	<p>DEP may have several Solid waste, Hazardous waste and Cleanup sites in the planned project area. As you design different phases of development, please review DEP's database and files for sites located within your planned activity. DEP, NED staff will be available for consultation and guidance for compliance with DEP's regulatory requirements.</p>
Brent Steele (904) 256-1565 (cc Rick Rachal and Ashwin Patel)	
<b><u>Waste</u></b>	
Solid Waste: Julia Boesch (904) 256-1577 (cc Ashwin Patel)	
Hazardous Waste: Vicky Valade (904) 256-1669	
Waste Cleanup: Rick Rachal (904) 256-1543 (cc Ashwin Patel)	
Tanks: Tim Dohany (904) 256-1681	
<b><u>Water</u></b>	
Potable Water: Blanche Waller (904) 256-1607	<p>The very large section on US 301 between Waldo and Hawthorne there are no large public water systems in this area. Using their proposed numbers of homes, "office" spaces, and industrial spaces, they would need 5.0 MGD of drinking water for average demand plus whatever would be needed for the retail area and schools. Without knowing what type of retail or how many schools, an estimate of average water usage cannot be calculated.</p> <p>This average demand would translate probably between 10-15 MGD maximum daily demand. Waldo or Hawthorne could not provide that amount of water. GRU could supply that amount of water as they are averaging 57% usage, which leaves about 23 MGD free for use, but this area is way outside the city limits and distribution piping would be very long, which is probably cost prohibitive. So they would probably need to build a water treatment plant and distribution system and permits would be required.</p>
Wastewater: Jeff Martin (904) 256-1614	GRU would really be the only WW service in the area. They would probably need to permit and build a domestic wastewater treatment plant.
Stormwater: Junhong Shi (904) 256-1645	Storm-water treatment, attenuation and floodplain regulation will most likely be required and covered by the Environmental Resource Permit(s) issued for these projects by the St. Johns River Water Management District.
Surface Water: Pat O'Connor (904) 256-1685	Alachua County has a robust environmental program and anyone dealing with surface water issues should ensure they coordinate with county staff accordingly. State requirements related to surface waters would generally only be associated if there is an industrial wastewater discharge.
Groundwater: Rob Martin (904) 256-1613	
<b><u>ERP</u></b>	
Matt Kershner: (904) 256-1649	





## *Florida Department of Transportation*

RICK SCOTT  
GOVERNOR

2198 Edison Avenue  
Jacksonville, Florida 32204-2730

ANANTH PRASAD  
SECRETARY

October 16, 2013

Marlie Sanderson  
Assistant Executive Director  
North Central Florida Regional Planning Council  
2009 NW 67th Place  
Gainesville, FL 32653-1603

**RE: Plum Creek Sector Plan, Methodology Comments**

Dear Mr. Sanderson,

This letter is provided to you as a follow up to our recent methodology meetings and discussions regarding the assessment of potential traffic impacts related to the Plum Creek Sector Plan. Our most recent discussion was held on October 7, 2013 and included representatives from Alachua County, the City of Gainesville, the North Central Florida Regional Planning Council and the Florida Department of Transportation. The Department notes that there are several issues that remain unresolved including internal capture assumptions, model platform and future network representation. Specific discussions regarding these concerns are provided below.

### **Internal Capture**

- The applicant's definition of internal capture includes trips that utilize the existing public roadway network for project trips that travel from one project TAZ to another project TAZ. While it is likely that there will be zone to zone travel within the project, internal capture reductions should only be for project trips that do not utilize the public roadway network.
- The methodology proposes to utilize the travel demand model to determine internal capture. The Department does not support this approach due to limitations of the GUATS model to provide sufficient productions and attractions. This is in part due to both the magnitude of the project and the location of the project on the periphery of the model. Further confusing the notion of internal capture is the zone to zone modeling approach posited by the applicant.

An estimate of internal capture using the ITE methodology was provided by the applicant. Results of this assessment significantly conflict with the model results. While both approaches for internal capture estimation (GUATS vs. ITE) have limitations, the Department suggested using the FDOT District

2 Internal Capture Report as a basis for establishing an acceptable internal capture rate for the development.

- The Gainesville model is inappropriate for modeling internal capture for this development. The model does not cover a large enough area to include the interaction with population areas within the commuter shed, or impact area, of this development (i.e. areas outside the model limits of Alachua County).

#### **Travel Demand / Project Distribution**

- The model does not cover a large enough area to include the interaction with population areas within the commuter shed of this development. Given the magnitude of the proposed job base, this development will attract significant work trips from the surrounding area. The GUATS model will not adequately forecast interactions with communities outside Alachua County.
- The Gainesville model does not supply enough productions and attractions to satisfy the demands of the sector plan. The GUATS model stream requires a balance of trips in order to forecast reasonable distributions. The methodology does not provide for adjustments to the external trips that are attracted to the development (EI and IE trips - Internal to External trips and External to Internal trips).
- The Applicant included a new six lane arterial in the GUATS model. This facility is intended to represent internal roadways and to provide connectivity for project TAZs. Discussions with the applicant indicate that the development does not intend to build a six lane facility but rather build a series of facilities that will ultimately provide project connectivity. The representation of this facility in the base model is inappropriate, particularly because it does not represent a committed network and it over represents project traffic interaction within the project area.

#### **Determination of Impacts Methodology**

- The applicant's methodology is to provide a 5 percent run out of project traffic similar to a DRI analysis. However, no methodology has been provided as to how the analysis will be performed. The Gainesville model does not provide for distribution outside of Alachua County. The sector plan is on the edge of the Gainesville model and therefore no distribution to the surrounding areas can be determined utilizing the current model structure. The Statewide model should be used for determining distribution to the surrounding commuter shed.

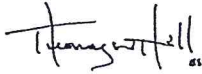
#### **Recommendations**

- Limit project internal capture rates to 30 percent. This is consistent with known capture rates for projects located in District Two. Additional allowances for higher capture rates may be considered through the DSAP process when more land use details are provided.
- Require the project to use the Statewide travel demand model because of the representation of outlying counties. The FDOT will provide assistance with this approach.

- Any internal roadway included in the model for distribution purposes must be committed projects by the developer.
- Project traffic impacts both inside and outside of Alachua County must be identified using the five percent threshold approach.

The Department appreciates the opportunity to participate and comment to the Plum Creek Sector Plan transportation methodology. I hope the information and discussion provided in this correspondence is helpful. We look forward to working with the Council, Alachua County and Plum Creek in finding an acceptable methodology for the proposed project. Please contact me if you have questions or require additional information at (904) 360-5647, or by email at [Thomas.Hill@dot.state.fl.us](mailto:Thomas.Hill@dot.state.fl.us)

Regards,

A handwritten signature in black ink, appearing to read "Thomas Hill", with a stylized flourish at the end.

Thomas Hill  
Growth and Development Administrator/DRI Coordinator  
Florida Department of Transportation  
Jacksonville Urban Office



## NORTH CENTRAL FLORIDA REGIONAL PLANNING COUNCIL

October 24, 2013

### Clearinghouse Committee Item #3 - Plum Creek Sector Plan Scoping Meeting Recommendations

#### INTRODUCTION

Pursuant to Subsection 163.3245(2), Florida Statutes, Alachua County requested, and the Council conducted a scoping meeting on September 23, 2013 for the Plum Creek Sector Plan. The purpose of a scoping meeting is to assist the Florida Department of Economic Opportunity and the County identify relevant planning issues to be addressed and the data and resources available to assist in the preparation of the sector plan. As part of the scoping meeting, the Council prepares a meeting summary and forwards recommendations received by the Council from local governments and state agencies which attended the scoping meeting to the County, Plum Creek and the Florida Department of Economic Opportunity.

Sector plans are large scale, consisting of 15,000 acres or more in area, long-range planning efforts for areas which local governments consider for adoption as amendments to local government comprehensive plans. Sector plans are an alternative to the Development of Regional Impact process. Similar to a Development of Regional Impact, sector plans are to protect regionally significant resources and facilities, including those regional facilities and resources which are not located in the local government of jurisdiction.

Sector plans are most similar to a Master Development of Regional Impact. A Master Development of Regional Impact consists of an Application for Master Development Approval, which governs the overall development of the project, and a series of Applications for Incremental Development Approval, which govern the specifics of the development of a portion of the project site and implement the development goals and policies contained in the Application for Master Development Approval. Sector plans consist of a long-term master plan and two or more detailed specific area plans. The long-term master plan establishes goals and policies for the development of the entire planning area while the detailed specific area plans implement the goals and policies contained in the long-term master plan for a portion of the planning area. The long-term master plan is reviewed by the Council as an amendment to the County Comprehensive Plan. However, detailed specific area plans are not reviewed by the Council.

#### PROJECT DESCRIPTION

The Plum Creek Sector Plan is anticipated to comprise approximately 60,000 of the 65,000 acres of land within Alachua County owned by Plum Creek. The construction phase of the sector plan is anticipated to last approximately 50 years. The subject property of the sector plan is generally located west of the City of Hawthorne (see attached map). The area generally located northwest of the City of Hawthorne is anticipated to be developed as urban-oriented mixed uses while the area generally near the City of Waldo and Lake Lochloosa will contain conservation-oriented uses. Currently, approximately 23,000 acres of the development area are in a conservation easement. Approximately 23,000 additional acres will be placed in a conservation easement. Approximately 3,000 acres will be in agricultural/rural use,

Approximately 13,000 acres are anticipated to be developed as urban uses. Preliminary development information for the sector plan indicates the planning area will contain approximately 6,000,000 square feet of research and development, office, and institutional uses, 8,000,000 square feet of manufacturing space, 10,500 dwelling units, and 1,000,000 square feet of retail commercial and service. Should the sector plan be constructed to its maximum allowable use, it is anticipated that the project will result in 30,000 jobs located on the project site (see attached).

## **EVALUATION**

Subsection 163.3245(2), Florida Statutes, specifies that, as part of the Scoping Meeting process, the Council shall make written recommendations to the Florida Department of Economic Opportunity and the County on the issues requested by the County. The County requested comments on the following issue areas:

1. Transportation
2. Capital Improvements Planning
3. Water Quality and Stormwater Maintenance
4. Wastewater
5. Water Supply Planning
6. Natural Resources
7. Recreation
8. Intergovernmental Coordination
9. Economic Development
10. Historic Preservation
11. Affordable Housing
12. Energy/Sustainability
13. Public Safety
14. Solid Waste

Council comments and recommendations on the above-referenced items are as follows.

### **Transportation**

Regionally significant transportation facilities identified in the North Central Florida Strategic Regional Policy Plan located within or adjacent to the planning area include U.S. Highway 301, State Road 20, State Road 26, State Road 121 and the CSX rail line adjacent to U.S. Highway 301. The Council is concerned about potential impacts of the development to these regionally significant transportation facilities. Therefore, it is recommended that the long-term master plan contain goals, policies and/or commitments which prevent, minimize and/or mitigate impacts to these regional transportation facilities as well as other regional transportation facilities identified in the regional plan in a manner consistent with the goals and policies of the regional plan.

Since the transportation impacts of the development may occur beyond the boundaries of the regional planning council (i.e., Clay, Marion and Putnam Counties), it is recommended that the long-term master plan contain goals, policies and/or commitments which prevent, minimize and/or mitigate impacts to regional transportation facilities identified in the strategic regional policy plans of the Northeast Regional Council and the Withlacoochee Regional Planning Council.

It is further recommended that the long-term master plan consider a light-rail connection from the development area to the City of Gainesville.

### **Capital Improvements Planning**

The New River Regional Landfill is a regional facility identified in the North Central Florida Strategic Regional Policy Plan. The Council is concerned about potential impacts to the landfill as a result of the sector plan. Therefore, it is recommended that the long-term master plan contain an analysis of impacts of the sector plan to the anticipated lifespan of the New River Regional Landfill.



### **Water Quality and Stormwater Maintenance**

See Natural Resources, below.

### **Wastewater**

No comments or recommendations.

### **Water Supply Planning**

See Natural Resources, below.

### **Natural Resources**

Natural Resources of Regional Significance identified and mapped in the North Central Florida Strategic Regional Policy Plan located within the planning area include the Floridan Aquifer, stream-to-sink recharge areas, regionally significant wetlands, the Lochloosa Conservation Area, Gum Root Park, Austin Carey Memorial Forest, Paynes Prairie and Santa Fe Swamp. The Council is concerned about potential adverse impacts to these Natural Resources of Regional Significance. Therefore, it is recommended that the long-term master plan contain goals, policies and/or commitments which prevent, minimize, and/or mitigate impacts to these Natural Resources of Regional Significance in a manner consistent with the goals and policies of the regional plan.

### **Recreation**

No comments or recommendations.

### **Intergovernmental Coordination**

It is recommended that the long-term master plan contain goals and policies which encourage coordination with the Cities of Gainesville and Hawthorne for the extension of centralized water and sanitary sewer service to the development area.

### **Economic Development**

No comments or recommendations.

### **Historic Preservation**

No comments or recommendations.



### **Affordable Housing**

The Council recommends using the North Central Florida Regional Planning Council affordable housing methodology to assess affordable housing impacts. The Council affordable housing methodology is a modified version of the East Central Florida Regional Planning Council affordable housing Impact methodology. The analysis of affordable housing impacts should not occur as part of the long-term master plan, but should occur for detailed specific area plans. The long-term master plan should include a commitment to address affordable housing impacts using the North Central Florida Regional Planning Council methodology, as amended. A copy of the Council affordable housing methodology can be downloaded at [http://www.ncfrpc.org/download/steve/NCFRPC\\_Affordable\\_Housing\\_Methodology/](http://www.ncfrpc.org/download/steve/NCFRPC_Affordable_Housing_Methodology/).

It is further recommended that the master development plan include language which directs that each detailed specific area plan should be treated as a stand-alone project for purposes of affordable housing impact analysis. More specifically, the cumulative unmet affordable housing need from the first detailed specific area plan should not be added to the cumulative unmet affordable housing need of subsequent detailed specific area plans.

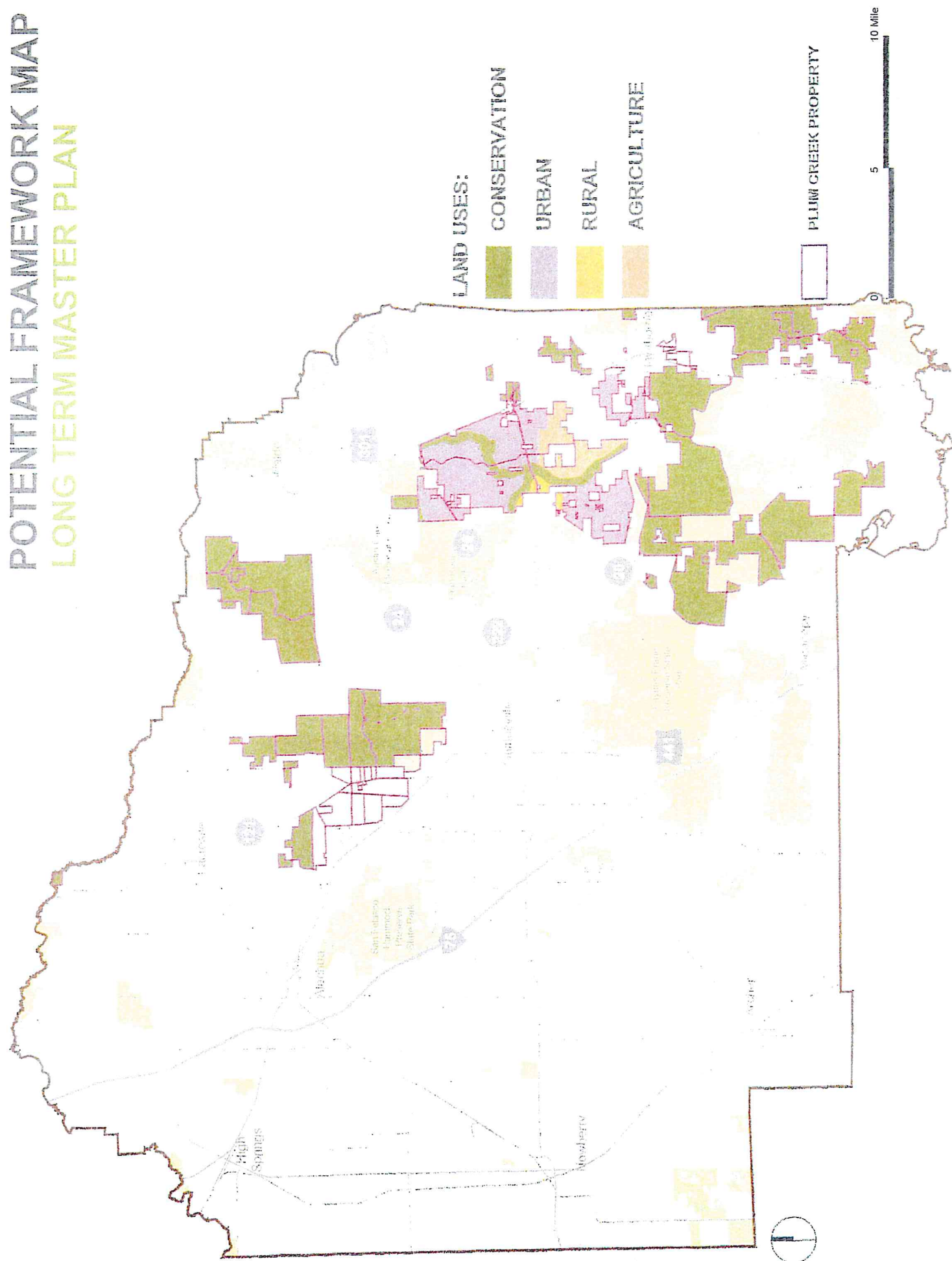
### **RECOMMENDATIONS**

It is recommended that these comments and recommendations be forwarded to Plum Creek, the County and the Florida Department of Economic Opportunity.

**Council Action:** At its October 24, 2013 meeting, the Council voted to adopt this report.

PLUM CREEK SCOPING MEETING  
EXCERPTS FROM APPLICANT HANDOUT MATERIALS

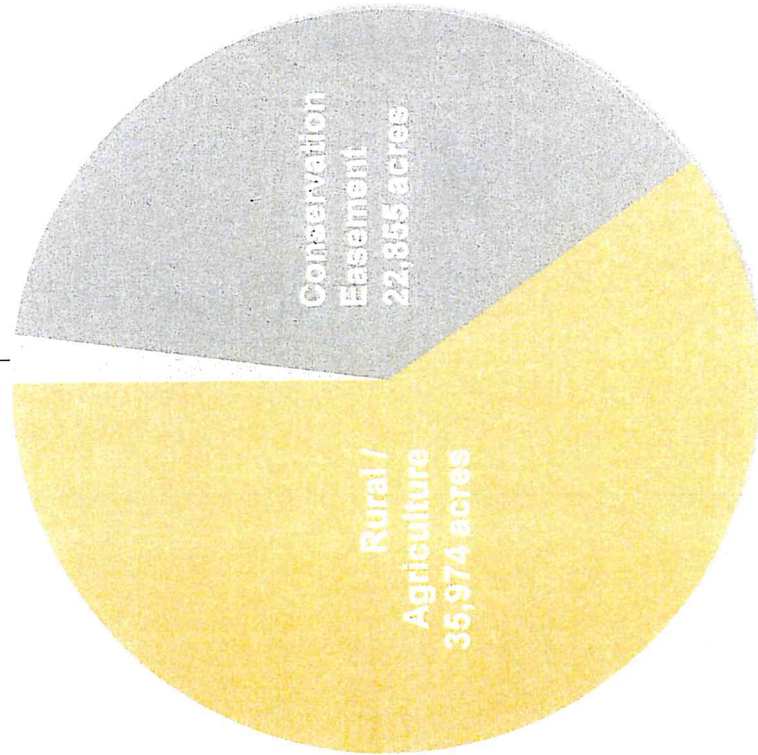
# POTENTIAL FRAMEWORK MAP LONG TERM MASTER PLAN



## Plum Creek Land Ownership: (60,116 acres)

**EXISTING**

Hawthorne Urban Reserve  
1,287 acres



## Long-Term Master Plan Framework: (60,116 acres)

**FUTURE**

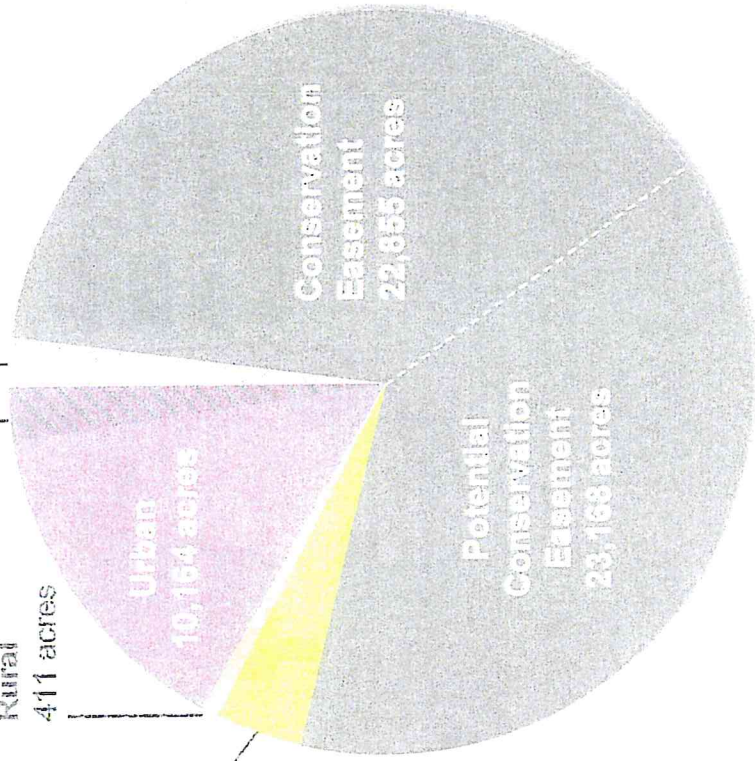
Urban Resource Based Open Space  
1,423 acres (included in Urban)

Hawthorne Urban Reserve  
1,287 acres

Agriculture  
2,231 acres

Rural  
411 acres

Urban  
10,164 acres





# PRELIMINARY ALLOWABLE LAND USES

Conservation	Agriculture	Rural	Urban
<ul style="list-style-type: none"> <li>• Preservation</li> <li>• Silviculture</li> <li>• Limited Ag consistent w/resource value</li> <li>• Environmental Services</li> <li>• Mitigation</li> <li>• Recreation</li> <li>• Roadway Connections</li> </ul>	<ul style="list-style-type: none"> <li>• 1 DU/40 acres</li> <li>• Silviculture</li> <li>• Conservation</li> <li>• Uses allowed in Rural/Ag Today</li> <li>• Environmental Services/Utilities</li> <li>• Related Research Facilities</li> <li>• Recreation</li> <li>• Roadway Connections</li> </ul>	<ul style="list-style-type: none"> <li>• Existing Zoning - Future Land Use</li> <li>• 1 DU/5 acres</li> <li>• Silviculture</li> <li>• Conservation</li> <li>• Recreation</li> <li>• Environmental Services/Utilities</li> <li>• Roadway Connections</li> </ul>	<ul style="list-style-type: none"> <li>• Uses allowed in the Urban Cluster</li> <li>• Agriculture</li> <li>• Conservation</li> <li>• Recreation</li> <li>• Silviculture</li> <li>• Environmental Services/Utilities</li> </ul>

# POTENTIAL URBAN LAND USE PROGRAM

## 50 YEARS

Urban Land Use	Program	Assumptions
<b>ECONOMIC DEVELOPMENT</b>		
• R&D/Office/Institutional	6,000,000 sf	Estimated 18,000 – 24,000 Jobs
• Advanced Manufacturing	8,000,000 sf	Estimated 6,000 – 12,000 Jobs
<b>COMMUNITY</b>		
• Residential	10,500 homes	3 jobs per household
• Retail/Service	1,000,000 sf	100 SF per household
• Schools		
• Civic Uses		Diverse community supporting uses
• Other community services		
<b>ENVIRONMENT</b>		
• Recreation & Open Space		35% open space



## **EXHIBIT 2: INVENTORY OF INDUSTRIAL, COMMERCIAL, AND OFFICE LANDS**

### **INTRODUCTION**

The proposed Comprehensive Plan Amendment for the Envision Alachua Sector Plan is proposing policies which could potentially allow for 15.5 million square feet of non-residential development, including a range of employment-based land uses within the designated Employment Oriented Mixed Use areas. The supporting data and analysis for the Envision Alachua Sector Plan application includes a report titled, “Industrial Lands Needs Analysis”, dated February 17, 2014 and prepared by CHW, Inc. This report asserts that there is a deficiency of industrial-designated land within Alachua County, and that employment-oriented lands need to be increased. The report emphasizes that there is lack of sites of at least 500 acres under common ownership for potential industrial use. It is noted that Florida Statutes Section 163.3245(3)(a)7 provides that, “A long-term master plan adopted pursuant to this section [Sector Plans] is not required to demonstrate need based upon projected population growth or on any other basis.”

The following information compiled by County staff provides an inventory of lands designated for industrial, commercial, and office uses on the Future Land Use Maps adopted as part of the Comprehensive Plans for Alachua County and each of its municipalities. This inventory utilizes the County’s Geographic Information Systems data, including Alachua County Property Appraiser tax parcels and Future Land Use Maps for Alachua County and each of its municipalities. The data prepared by County staff indicates that there is a substantial supply of undeveloped land that is currently designated for industrial, commercial, and office uses in Alachua County. This supply of undeveloped land includes approximately 4,500 acres designated for industrial uses, 3,700 acres designated for commercial uses, and 252 acres designated for office uses. Most of these lands are strategically located proximate to existing urban areas, where economic and physical infrastructure is generally available to serve new development. These lands have the potential to be developed with new industrial, commercial, and office uses, which could potentially generate new jobs within Alachua County.

### **INDUSTRIAL-DESIGNATED LAND SUPPLY**

The inventory of industrial-designated lands includes properties with Future Land Use Map designations which would allow for heavy industrial, light industrial, manufacturing, warehousing, distribution, research & development, business parks, or general employment-based uses. Table 1 and Map 1 below identify the total quantity and location of industrial-designated lands in the County and in each municipality. Table 2 and Map 2 identify those industrial-designated lands that are presently undeveloped and would be potentially available for new employment-based industrial development.

The data compiled by staff indicates that there are approximately 9,597 acres of industrial-designated lands countywide, and of that total, approximately 4,553 acres are presently undeveloped. As shown on Maps 1 and 2, most of the industrial-designated lands in Alachua County are strategically located proximate to existing economic and physical infrastructure such as Gainesville Regional Airport, Interstate-75, railroad lines, communication networks, local road networks, and centralized potable water and sanitary sewer systems. The largest concentrations of industrial-designated lands are within the cities of Gainesville (3,240 acres designated and 1,380 acres undeveloped) and Alachua (2,759 acres designated and 1,463 acres undeveloped), and within the unincorporated area (1,907 acres designated and 962 acres undeveloped). The City of Hawthorne has 448 acres designated on its Future Land Use Map for industrial uses, and 368 acres of that is presently undeveloped.

Table 1. Lands with Industrial Future Land Use Designations

Jurisdiction	Acres
Alachua	2,759
Archer	185
Gainesville	3,240
Hawthorne	448
High Springs	164
LaCrosse	12
Micanopy	37
Newberry	806
Waldo	39
Unincorporated	1,907
<b>Countywide Total</b>	<b>9,597</b>

*Figures include the acreage of tax parcels that have industrial Future Land Use Map designations as provided in the Comprehensive Plans of each jurisdiction. Acreage figures at left include both developed and undeveloped lands.*

Map 1. Lands with Industrial Future Land Use Designations

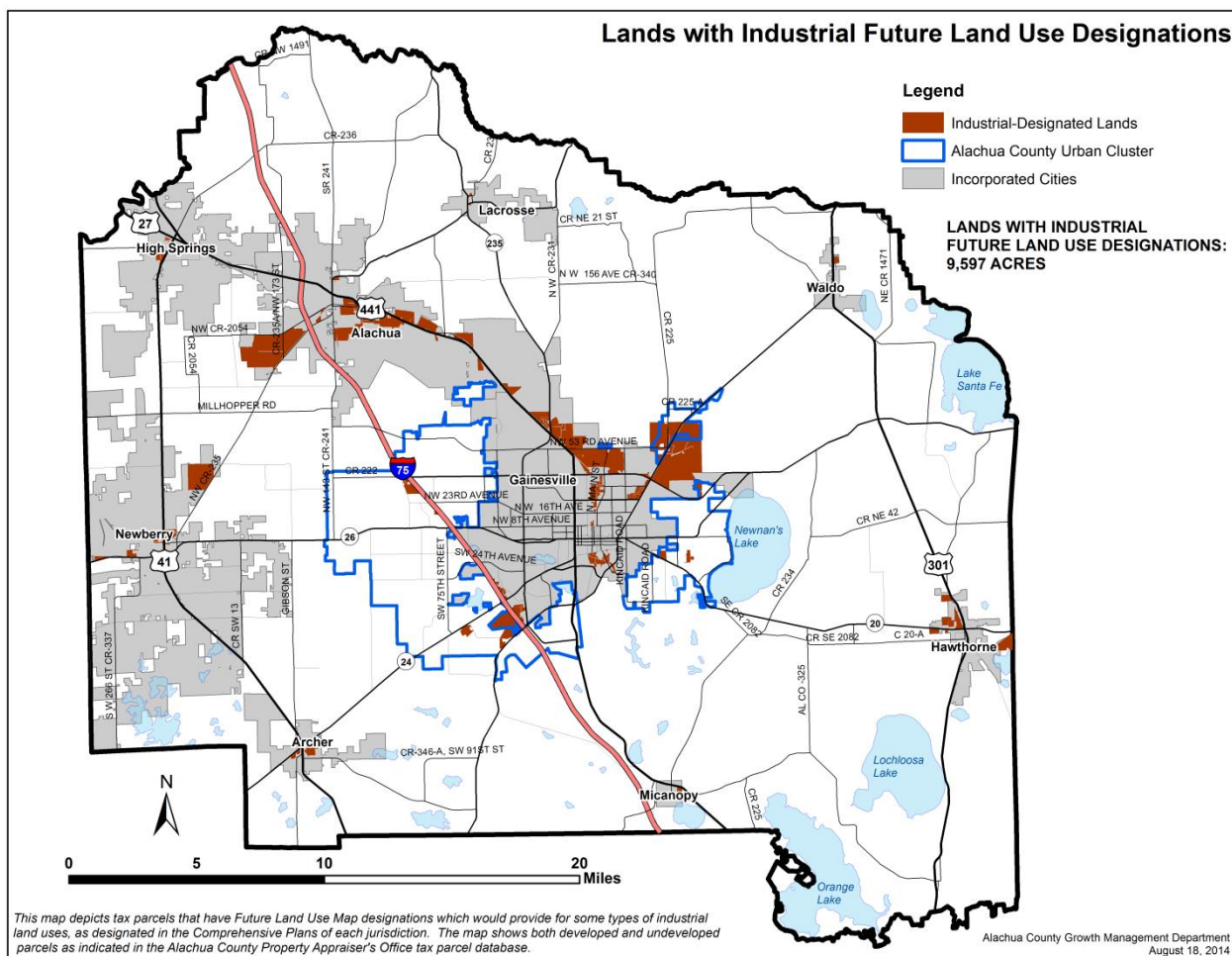
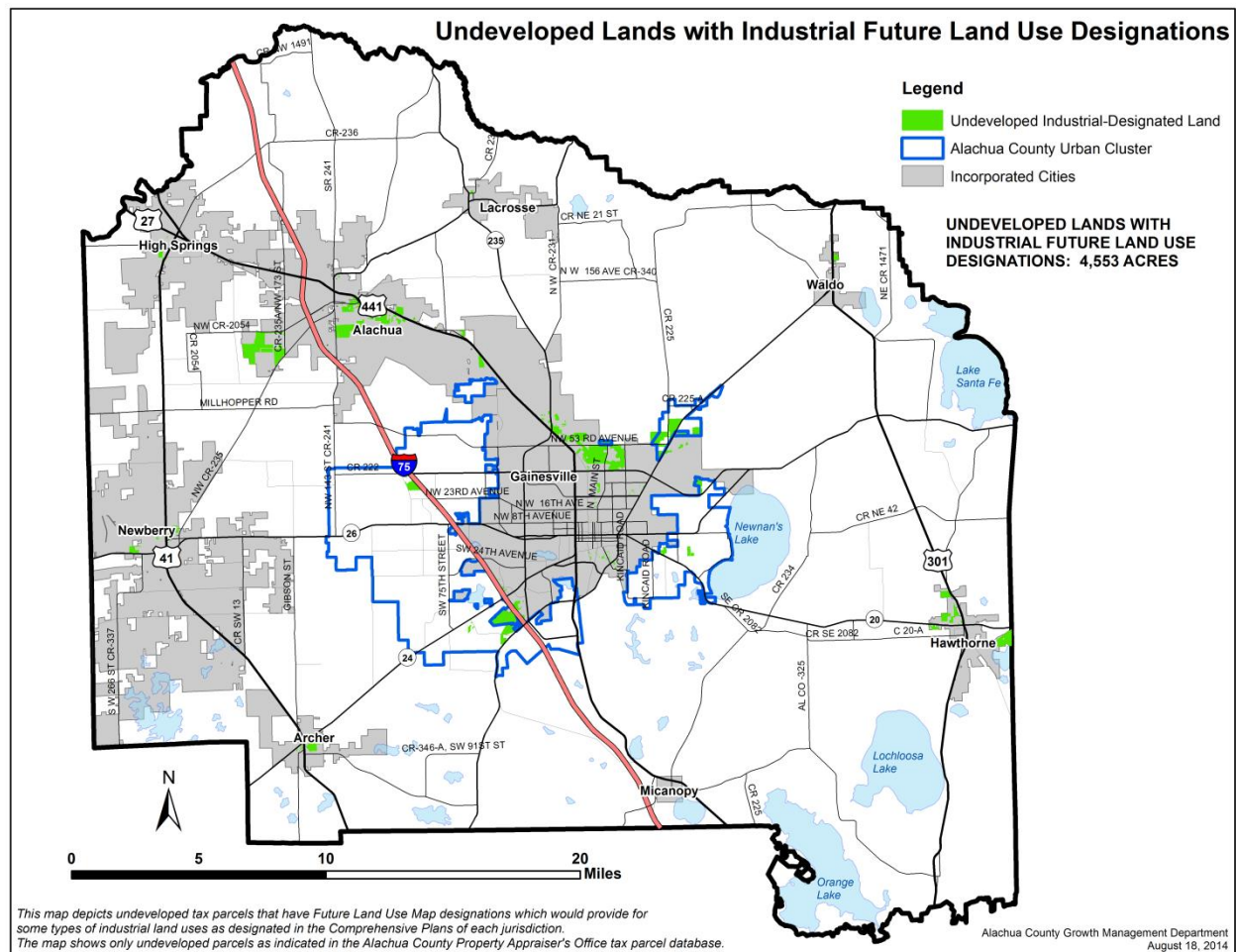


Table 2. Undeveloped Lands with Industrial Future Land Use Designations

Jurisdiction	Acres
Alachua	1,463
Archer	152
Gainesville	1,380
Hawthorne	368
High Springs	62
LaCrosse	9
Micanopy	0
Newberry	120
Waldo	37
Unincorporated	962
<b>Countywide Total</b>	<b>4,553</b>

*Figures include the acreage of undeveloped tax parcels that have an Industrial Future Land Use Map designation as provided in the Comprehensive Plans of each jurisdiction. The map shows only undeveloped parcels as indicated in the Alachua County Property Appraiser's Office tax parcel database.*

Map 2. Undeveloped Lands with Industrial Future Land Use Designations



The applicant's data and analysis indicates that there is a lack of sites that are of sufficient size (defined by applicant as at least 500 acres) to accommodate large-scale industrial uses for "substantial job creation". The applicant's data and analysis does not indicate the basis for this 500-acre threshold and does not provide any evidence that there is a need or a market for industrial sites of this size in Alachua County. As a point of reference as to the acreage, the 1.2 million square-foot Wal-Mart distribution center in Alachua is located on a 230-acre site; the 1 million square-foot Dollar General distribution center is located on a 204-acre site.

In Alachua County, there are 507 tax parcels (4,553 acres) that are undeveloped and designated for industrial uses on County and City Future Land Use Maps. There is a variety of parcel sizes in this inventory, including some larger parcels which could potentially accommodate new industrial development. Information on the sizes of undeveloped tax parcels with industrial future land use designations is provided in Table 3. According to this countywide data, there are 13 tax parcels in the 30 to 50 acre range; 14 tax parcels in the 50 to 100 acre range; 6 tax parcels in the 100 to 200 acre range, and 3 tax parcels that are greater than 200 acres. The City of Hawthorne has 6 undeveloped industrial-designated parcels that are 30 acres or greater, 3 of which are greater than 50 acres (these parcels are included in the countywide numbers). In addition to the existing supply of larger industrial-designated parcels, it is also possible to assemble smaller parcels to create sites of sufficient size for larger-scale industrial development.

Table 3. Range of Sizes for Undeveloped Tax Parcels with Industrial Future Land Use Designations

Acreage Range	Number of Parcels
0 to 5	390
>5 to 10	42
>10 to 30	36
>30 to 50	13
>50 to 100	14
>100 to 200	6
>200	3

- 507 total tax parcels (countywide) are undeveloped with industrial Future Land Use designations.
  - Average (Mean) Parcel Size: 9.0 acres
  - Median Parcel Size: 1.2 acres

#### Industrial Development Potential and Employment Generation

The currently-undeveloped lands designated for industrial uses in the County have the potential to accommodate new industrial uses, which could generate new employment opportunities within Alachua County. The potential quantity of industrial floor area on these undeveloped lands can be estimated using the data on undeveloped industrial-designated acreage and a standard floor area ratio. Then, using the estimated floor area and a multiplier for job generation, it is possible to estimate the potential number of new jobs that could be generated. For purposes of these estimates, a floor area ratio (FAR) of 0.1 was used (i.e., building floor area would comprise 10% of a site), which is representative of typical industrial-type development in this area. A jobs multiplier of 1.2 jobs per 1,000 square feet was used to estimate the number of jobs; this is the jobs multiplier used in the applicant's data and analysis to estimate employment generation for "advanced manufacturing" uses. Table 4 below provides information on the estimated quantity of new industrial

development that could occur on undeveloped industrial-designated lands, and the potential employment generation resulting from this new development.

Table 4. Job Creation Potential of Undeveloped Lands Currently Designated for Industrial Land Uses

Jurisdiction	Undeveloped Lands Designated for Industrial Use* (Acres)	Conversion of Acres to Square Feet	Floor Area of Potential Industrial Development**	Potential Jobs Generated **
Alachua	1,463	63,728,280	6,372,828	7,647
Archer	152	6,621,120	662,112	795
Gainesville	1,380	60,112,800	6,011,280	7,214
Hawthorne	368	16,030,080	1,603,008	1,924
High Springs	62	2,700,720	270,072	324
LaCrosse	9	392,040	39,204	47
Micanopy	0	0	0	0
Newberry	120	5,227,200	522,720	627
Waldo	37	1,611,720	161,172	193
Unincorporated	962	41,904,720	4,190,472	5,029
<b>Countywide Total</b>	<b>4,553</b>	<b>198,328,680</b>	<b>19,832,868</b>	<b>23,799</b>

\* Based on lands designated for industrial use on County and municipal Future Land Use Maps in adopted Comprehensive Plans.

\*\* Based on development of industrial-designated lands at a Floor Area Ratio of 0.1.

\*\*\* Based on multiplier of 1.2 Jobs Per 1,000 square feet, as identified in Envision Alachua Sector Plan proposed Policy 10.2.6.4.iv for "advanced manufacturing" uses.

It is estimated that the supply of undeveloped industrial-designated lands in the County (4,553 acres) could accommodate nearly 20 million square feet of new industrial development. This includes just over 6 million square feet each in the Cities of Alachua and Gainesville, and just over 4 million square feet in the unincorporated County. It is also estimated that the undeveloped industrial-designated lands in the City of Hawthorne (368 acres) could accommodate about 1.6 million square feet of new industrial development. These estimates are based on gross acreage figures and standard floor are ratios; there are site-specific factors that will affect the development potential of individual properties such as road access, stormwater management, environmental suitability, and local land development code standards.

If all of the undeveloped industrial-designated lands were to be developed with new industrial uses, this could potentially generate nearly 24,000 new jobs in Alachua County. Nearly 15,000 of these new jobs would be in the Cities of Alachua and Gainesville, and about 5,000 would in the unincorporated area, based on the locations of industrial-designated land. In the City of Hawthorne, there is the potential for creation of nearly 2,000 new jobs based on the quantity of currently-designated industrial lands that are undeveloped.

Based on the data provided above, there is a significant quantity of undeveloped land that is currently designated for industrial uses in the County. These lands are strategically located proximate to existing economic and physical infrastructure in the community. If these undeveloped industrial-designated lands were to be developed with new industrial uses, this could potentially generate a significant number of new jobs within Alachua County.

## **COMMERCIAL AND OFFICE-DESIGNATED LAND SUPPLY**

In addition to the lands designated for industrial uses identified in the previous section, there are lands designated in the Alachua County and Municipal Comprehensive Plans for commercial and office uses which have the potential to accommodate new development and generate new jobs. A similar inventory of countywide lands designated for commercial and office uses has been compiled, with estimates of the potential new development that could occur and the number of jobs generated. This inventory includes properties with Future Land Use Map designations which would allow for a variety of commercial uses such as retail, general office, medical office, tourism-oriented uses, professional services, and personal services. The inventory suggests that there is a substantial supply of undeveloped land which is designated for commercial and office uses, which if developed with new commercial and office uses, could generate a significant number of jobs in the County.

### **Commercial-Designated Land**

Table 5 below identifies the total quantity of commercial-designated lands in the County and in each municipality. This inventory suggests that there is nearly 9,000 acres that are currently designated for commercial land uses, and that just over 3,700 acres of that are currently undeveloped. The largest concentrations of commercial-designated land are located in Gainesville and unincorporated Alachua County; the Cities of Alachua, High Springs, and Newberry also have significant quantities of land designated for commercial uses. The City of Hawthorne has 232 acres designated on its Future Land Use Map for commercial uses, with 135 acres of that being currently undeveloped.

Using the amount of undeveloped acreage designated for commercial uses, staff estimated the amount of commercial floor area that could be developed based on a standard floor area ratio of 0.1. Then, using the estimated quantity of commercial floor area, staff estimated the number of jobs that could be generated based on the employment multiplier for “commercial” uses (2.5 jobs per 1,000 square feet) identified in the Envision Alachua proposed Policy 10.2.6.4.iv. Based on these calculations, it is estimated that future development in currently-designated commercial areas could generate about 40,000 new jobs countywide. These estimates are based on gross acreage figures and standard floor area ratios; there are site-specific factors that will affect the development potential of individual properties such as road access, stormwater management, environmental suitability, and local land development code standards.



Table 5. Commercial-Designated Lands, Estimated Floor Area of Development, and Jobs Generated

<b>COMMERCIAL</b>					
<b>Jurisdiction</b>	<b>Total Acres Designated for Commercial Uses*</b>	<b>Acres Undeveloped</b>	<b>Conversion of Acres to Square Feet</b>	<b>Estimated Floor Area of Commercial Development**</b>	<b>Estimated Jobs Generated***</b>
Alachua	1,166	862	37,548,720	3,754,872	9,387
Archer	51	8	348,480	34,848	87
Gainesville	3,364	254	11,064,240	1,106,424	2,766
Hawthorne	232	135	5,880,600	588,060	1,470
High Springs	990	529	23,043,240	2,304,324	5,761
LaCrosse	16	5	217,800	21,780	54
Micanopy	125	73	3,179,880	317,988	795
Newberry	774	655	28,531,800	2,853,180	7,133
Waldo	90	23	1,001,880	100,188	250
Unincorporated	2,158	1,199	52,228,440	5,222,844	13,057
<b>TOTAL</b>	<b>8,966</b>	<b>3,743</b>	<b>163,045,080</b>	<b>16,304,508</b>	<b>40,761</b>

\* Based on lands designated for commercial use on County and municipal Future Land Use Maps in adopted Comprehensive Plans. This includes some mixed use categories which would allow for commercial uses.

\*\* Based on development of commercial-designated lands at an overall Floor Area Ratio of 0.10.

\*\*\* Based on multiplier of 2.5 Jobs Per 1,000 square feet, as identified in Envision Alachua Sector Plan proposed Policy 10.2.6.4.iv for "commercial" uses.

### Office-Designated Land

Office uses are typically allowable within most commercial Future Land Use categories designated in local Comprehensive Plans, however, Gainesville and unincorporated Alachua County have mapped areas that are specifically designated for office uses. Table 6 below identifies the total quantity of office-designated land in the County, including those areas in Gainesville and the unincorporated County. This inventory suggests that there is about 1,100 acres that are currently designated for office land uses, and that about 252 acres of that are currently undeveloped.

Using the amount of undeveloped acreage designated for office uses, staff estimated the amount of office floor area that could be developed based on a standard floor area ratio of 0.1. This estimate is based on gross acreage figures and standard floor area ratios for new development; there are site-specific factors that will affect the development potential of individual properties such as road access, stormwater management, environmental suitability, and local land development code standards. Using the estimated quantity of office floor area, staff estimated the number of jobs that could be generated based on the employment multiplier for "R&D/Office" uses (4.0 jobs per 1,000 square feet) identified in the Envision Alachua proposed Policy 10.2.6.4.iv. Based on these calculations, it is estimated that future development in currently-designated office areas could generate almost 4,400 new jobs countywide.

Table 6. Office-Designated Lands, Estimated Floor Area of Development, and Jobs Generated

<b>OFFICE</b>					
<b>Jurisdiction</b>	<b>Total Acres Designated for Office Uses*</b>	<b>Acres Undeveloped</b>	<b>Conversion of Acres to Square Feet</b>	<b>Estimated Floor Area of Office Development**</b>	<b>Estimated Jobs Generated***</b>
Gainesville	740	78	3,397,680	339,768	1,359
Unincorporated	385	174	7,579,440	757,944	3,032
<b>TOTAL</b>	<b>1,125</b>	<b>252</b>	<b>10,977,120</b>	<b>1,646,568</b>	<b>4,391</b>

\* Based on lands designated specifically for office use on County and municipal Future Land Use Maps in adopted Comprehensive Plans.

\*\* Based on development of office-designated lands at an overall Floor Area Ratio of 0.10

\*\*\* Based on multiplier of 4.0 Jobs Per 1,000 square feet, as identified in Envision Alachua Sector Plan proposed Policy 10.2.6.4.iv for "R&D/Office" uses.

#### Parcel Size Ranges for Commercial and Office-Designated Lands

In Alachua County, there are 829 tax parcels that are undeveloped and designated for commercial uses on County and City Future Land Use Maps. There is a variety of parcel sizes in this inventory, ranging from less than one acre up to over 100 acres. Information on the sizes of undeveloped tax parcels with commercial future land use designations is provided in Table 7. According to this countywide data, the majority of parcels are less than 5 acres, although there is a supply of parcels in the higher acreage ranges. There are 18 tax parcels in the 30 to 50 acre range; 10 tax parcels in the 50 to 100 acre range; and 5 tax parcels in the 100 to 200 acre range.

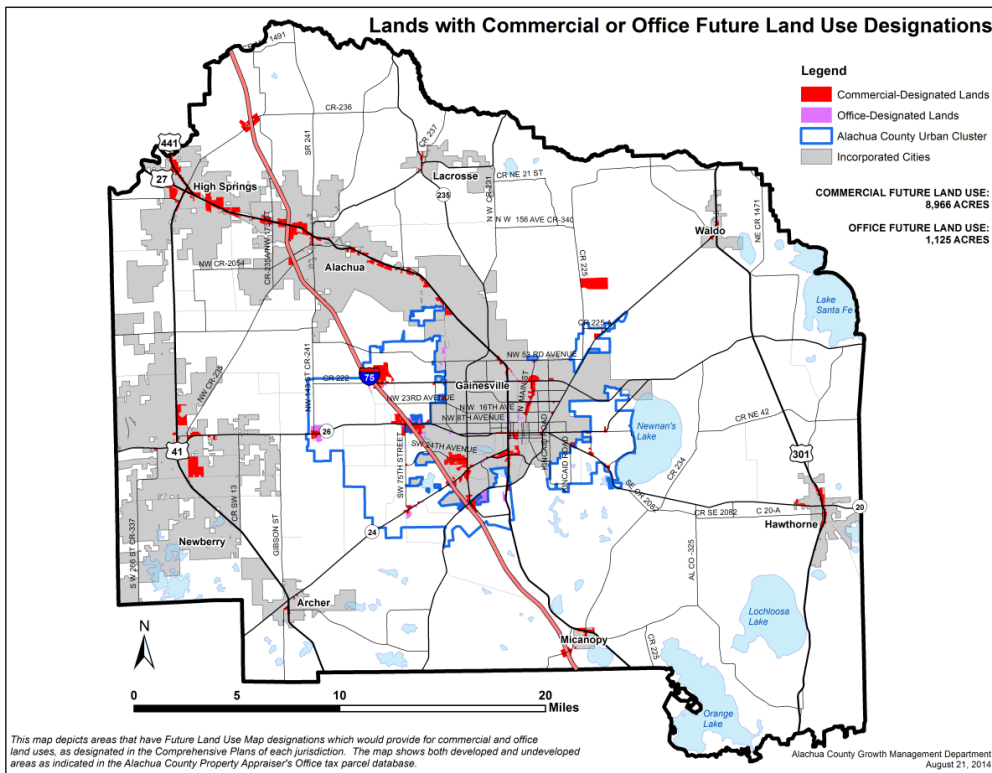
For office-designated lands, there are 135 total tax parcels that are currently undeveloped. The vast majority of the undeveloped office-designated parcels are less than 5 acres, although there are a few in the medium acreage ranges.

Table 7. Parcel Size Ranges for Undeveloped Commercial and Office Designated Lands

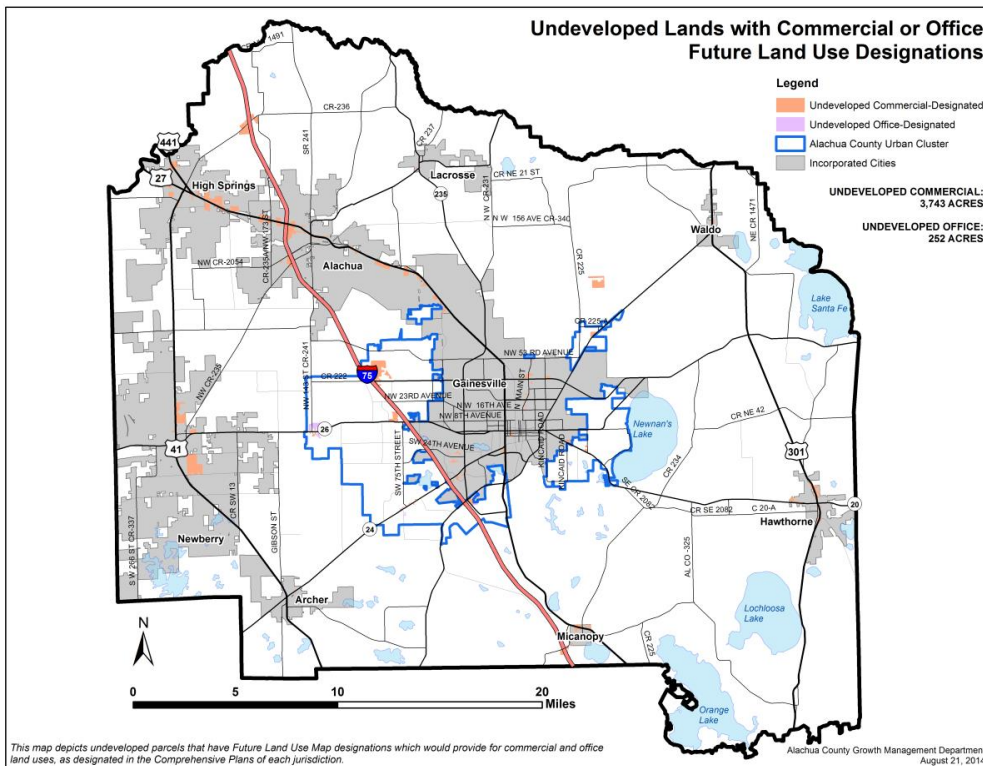
<b>Acreage Range</b>	<b>Number of Undeveloped Parcels: Commercial</b>	<b>Number of Undeveloped Parcels: Office</b>
0 to 5	705	126
>5 to 10	48	4
>10 to 30	43	3
>30 to 50	18	1
>50 to 100	10	1
>100 to 200	5	0
>200	0	0

- 829 total tax parcels (countywide) are undeveloped with commercial Future Land Use designations.
- 135 total tax parcels (countywide) are undeveloped with office Future Land Use designations.

Map 3. Lands with Future Land Use Designation for Commercial or Office Uses



Map 4. Undeveloped Lands with Future Land Use Designation for Commercial or Office Uses



## Exhibit 3 Proposed Development Program Policies for EOMU Areas

These are excerpted policies for the total potential development program, residential unit counts, square feet and minimum and maximum densities and intensities for each distinct sub-area of the Envision Alachua Employment Oriented Mixed Use land use category. The full policies related to each sub-area and the rest of the application can be found in Section II.B of the application.

### **Policy 10.1.4 Development Program**

The standards for measuring the maximum development program permitted within the Envision Alachua Planning Area shall be based upon the following:

a. Maximum Development Program Baseline.

Residential: 10,500 homes\*

Non-residential: 15.5 million square feet\*\*

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

\* Accessory dwelling units may be provided; however, such units shall be in addition to the maximum residential units noted above.

\*\* Facilities to serve the community including, but not limited to, schools, places of worship, government services, recreation, utilities, and civic facilities, shall be provided as needed. Floor area for such facilities shall be in addition to the maximum nonresidential square footage noted above.

b. Conversions. The development program shall be flexible to allow for minor adjustments in land uses over the course of the estimated 50-year planning period to respond to changing market conditions. Conversions of residential units to nonresidential floor area, and conversions of nonresidential floor area to residential units, shall be permitted based on the following standard: 1 dwelling unit = 2500 square feet of nonresidential floor area. Conversions shall be limited such that the maximum increase in the number of residential units or the floor area of nonresidential space shall not exceed 10% of the maximums set forth in 10.1.4. above.

c. Measurement. Non-residential Square footage shall be measured based upon areas under roof (heated and cooled).

d. Allocation of development rights within the Planning Area. The development program maximums set forth herein shall be allocated

## Exhibit 3 Proposed Development Program Policies for EOMU Areas

to Areas of the Planning Area as provided in the policies of Objective 10.3. Over time, unused allocations shall not be deemed to be extinguished as Areas “build-out” and shall be permitted to shift to other Areas within the Planning Area consistent with the maximum development program established for each Area in the policies of Objective 10.3.

The square footage of any development that is included within the EASP Planning Area that is subsequently included within a Campus Master Plan and separately mitigated shall be in addition to the maximum development program in Policy 10.1.4.

### **Policy 10.3.1.1 Area A Development Program**

The standards for measuring the maximum development program permitted within Area A shall be based upon the following:

#### a. Maximum Development Program Baseline\*

Residential: 7,000 dwelling units\*\*

Non-residential\*\*\*:

Research & Development / Office 6.0 million square feet

Advanced Manufacturing 2.0 million square feet

Commercial 1.0 million square feet

\* The maximum development program described for each EA-EOMU Area is not cumulative and shall be limited by the overall EASP development program as established in Policy 10.1.4.

\*\* Accessory dwelling units may be provided; however, such units shall be in addition to the maximum residential units noted above.

\*\*\* Facilities to serve the community including, but not limited to, schools, places of worship, government services, recreation, utilities, and civic facilities, shall be provided as needed. Floor area for such facilities shall be in addition to the maximum nonresidential square footage noted above.

### **Policy 10.3.1.2 Area A Permitted Uses/Density/Intensity**

## Exhibit 3 Proposed Development Program Policies for EOMU Areas

Lands designated within Area A 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) <sup>2</sup>		Intensity FAR <sup>2</sup>	
	Min	Max	Min	Max
Mixed Use Jobs Center				
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		
Outside Mixed Jobs Use Center				
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 Area A.

### **Policy 10.3.1.3 Area A Mix of Uses**

Area A shall be developed to accommodate a composite land use mix as described below.

	Minimum	Maximum
Open Space (1) (Percentage of Area A Total Acres)		
	41%	(1)
Area Net of Open Space (Percentage of Area A Total Acres net of open space)		
R&D / Office	15%	30%
Manufacturing	0%	20%
Commercial	1%	20%
Residential	40%	75%
Recreation (2)	5%	---



## Exhibit 3 Proposed Development Program Policies for EOMU Areas

Civic	5%	---
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(1) An applicant may provide additional open space above and beyond the minimum open space requirement as a part of the DSAP process, however, the minimum open space standard reflects the requirement of the comprehensive plan with regard the amount of open space that shall be provided within Area A.

(2) Active Recreation uses are permitted to occur within the 100 year Floodplain. These recreational lands are supplemental to the passive recreation uses provided within the EASP Conservation Land Use.

### **Policy 10.3.2.1 Area B Development Program**

The standards for measuring the maximum development program permitted within Area B shall be based upon the following:

#### a. Maximum Development Program Baseline\*

Residential: 1,500 dwelling units\*\*

Non-residential\*\*\*:

Research & Development / Office 1.0 million square feet

Advanced Manufacturing 3.6 million square feet

Commercial 400,000 square feet

\* The maximum development program described for each EA-EOMU Area is not cumulative and shall be limited by the overall EASP development program as established in Policy 10.1.4.

\*\* Accessory dwelling units may be provided; however, such units shall be in addition to the maximum residential units noted above.

\*\*\* Facilities to serve the community including, but not limited to, schools, places of worship, government services, recreation, utilities, and civic facilities, shall be provided as needed. Floor area for such facilities shall be in addition to the maximum nonresidential square footage noted above.

### **Policy 10.3.2.2 Area B Permitted Uses/Density/Intensity**

## Exhibit 3 Proposed Development Program Policies for EOMU Areas

Lands designated within Area B shall be permitted the full range of uses as described in Policy 10.2.6 with the densities and intensities as described below. R&D/Office and Advanced Manufacturing uses are not permitted south of SR 20.

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

### **Policy 10.3.2.3 Area B Mix of Uses**

Area B 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 Area B Total Acres)</u>		
	<u>34%</u>	<u>(1)</u>
<u>Buildable Area</u> <u>(Percentage of Area B Acres Net of Open Space)</u>		
<u>Commercial</u>	<u>0%</u>	<u>20%</u>
<u>R&amp;D / Office</u>	<u>0%</u>	<u>15%</u>
<u>Manufacturing</u>	<u>40%</u>	<u>63%</u>
<u>Residential</u>	<u>25%</u>	<u>40%</u>
<u>Recreation (2)</u>	<u>5%</u>	<u>---</u>
<u>Civic</u>	<u>7%</u>	<u>---</u>

## Exhibit 3 Proposed Development Program Policies for EOMU Areas

(1) An applicant may provide additional open space above and beyond the minimum open space requirement as a part of the DSAP process, however, the minimum open space standard reflects the requirement of the comprehensive plan with regard the amount of open space that shall be provided within Area B.

(2) Active Recreation uses are permitted to occur within the 100 year Floodplain. These recreational lands are supplemental to the passive recreation uses provided within the EASP Conservation Land Use.

### **Policy 10.3.3.1 Area C Development Program**

The standards for measuring the maximum development program permitted within Area C shall be based upon the following:

#### a. Maximum Development Program Baseline\*

Residential: 5,000 dwelling units\*\*

Non-residential\*\*\*:

Research & Development / Office 3.0 million square feet

Advanced Manufacturing 5.0 million square feet

Commercial 500,000 square feet

\* The maximum development program described for each EA-EOMU Area is not cumulative and shall be limited by the overall EASP development program as established in Policy 10.1.4.

\*\* Accessory dwelling units may be provided; however, such units shall be in addition to the maximum residential units noted above.

\*\*\* Facilities to serve the community including, but not limited to, schools, places of worship, government services, recreation, utilities, and civic facilities, shall be provided as needed. Floor area for such facilities shall be in addition to the maximum nonresidential square footage noted above.

### **Policy 10.3.3.2 Area C Permitted Uses/Density/Intensity**

Lands designated within Area C shall be permitted the full range of uses as described in Policy 10.2.6 with the densities and intensities as described below.

## Exhibit 3 Proposed Development Program Policies for EOMU Areas

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

### **Policy 10.3.3.3 Area C Mix of Uses**

Area C 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 Area C Total Acres)</u>		
	<u>30%</u>	<u>---</u>
<u>Buildable Area</u> <u>(Percentage of Area C Total Buildable Acres)</u>		
<u>Commercial</u>	<u>0%</u>	<u>10%</u>
<u>R&amp;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>

(1) An applicant may provide additional open space above and beyond the minimum open space requirement as a part of the DSAP process, however, the minimum open space standard reflects the requirement of the comprehensive plan with regard the amount of open space that shall be provided within Area C.

## Exhibit 3 Proposed Development Program Policies for EOMU Areas

(2) Active Recreation uses are permitted to occur within the 100 year Floodplain. These recreational lands are supplemental to the passive recreation uses provided within the EASP Conservation Land Use.

### **Policy 10.3.4.1 Area D Development Program**

The standards for measuring the maximum development program permitted within Area D shall be based upon the following:

#### a. Maximum Development Program Baseline\*

Residential: 2,000 dwelling units\*\*

Non-residential\*\*\*:

Research & Development / Office 1.5 million square feet

Advanced Manufacturing 1.5 million square feet

Commercial 300,000 square feet

\* The maximum development program described for each EA-EOMU Area is not cumulative and shall be limited by the overall EASP development program as established in Policy 10.1.4.

\*\* Accessory dwelling units may be provided; however, such units shall be in addition to the maximum residential units noted above.

\*\*\* Facilities to serve the community including, but not limited to, schools, places of worship, government services, recreation, utilities, and civic facilities, shall be provided as needed. Floor area for such facilities shall be in addition to the maximum nonresidential square footage noted above.

### **Policy 10.3.4.2 Area D Permitted Uses/Density/Intensity**

Lands designated within Area D 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) <sup>2</sup>		Intensity FAR <sup>2</sup>	
	Min	Max	Min	Max

## Exhibit 3 Proposed Development Program Policies for EOMU Areas

R&D / Office	n/a	(1)	0.20	0.50
Advanced Manufacturing	n/a	n/a	0.15	0.50
Commercial	7.0 DU/AC	15 DU/AC	0.20	0.50
Residential	0.20 DU/AC	4.0 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 Area D.

### **Policy 10.3.4.3 Area D Mix of Uses**

Area D 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 Area D Total Acres)</u>		
	<u>30%</u>	<u>---</u>
<u>Buildable Area</u> <u>(Percentage of Area D Acres Net of Open Space)</u>		
<u>Commercial</u>	<u>0%</u>	<u>10%</u>
<u>R&amp;D / Office</u>	<u>0%</u>	<u>10%</u>
<u>Manufacturing</u>	<u>0%</u>	<u>10%</u>
<u>Residential</u>	<u>0%</u>	<u>93%</u>
<u>Recreation (2)</u>	<u>5%</u>	<u>---</u>
<u>Civic</u>	<u>2%</u>	<u>---</u>

(1) An applicant may provide additional open space above and beyond the minimum open space requirement as a part of the DSAP process, however, the minimum open space standard reflects the requirement of the comprehensive plan with regard the amount of open space that shall be provided within Area D.

(2) Active Recreation uses are permitted to occur within the 100 year Floodplain. These recreational lands are supplemental to the passive recreation uses provided within the EASP Conservation Land Use.

### **Policy 10.3.5.1 Area E Development Program**



## Exhibit 3 Proposed Development Program Policies for EOMU Areas

The standards for measuring the maximum development program permitted within Area E shall be based upon the following:

### a. Maximum Development Program Baseline\*

Residential: 500 dwelling units\*\*

Non-residential\*\*\*:

Research & Development / Office 500,000 square feet

Advanced Manufacturing 500,000 square feet

Commercial 50,000 square feet

\* The maximum development program described for each EA-EOMU Area is not cumulative and shall be limited by the overall EASP development program as established in Policy 10.1.4.

\*\* Accessory dwelling units may be provided; however, such units shall be in addition to the maximum residential units noted above.

\*\*\* Facilities to serve the community including, but not limited to, schools, places of worship, government services, recreation, utilities, and civic facilities, shall be provided as needed. Floor area for such facilities shall be in addition to the maximum nonresidential square footage noted above.

### **Policy 10.3.5.2 Area E Permitted Uses/Density/Intensity**

Lands designated within Area E 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) <sup>2</sup>		Intensity FAR <sup>2</sup>	
	Min	Max	Min	Max
R&D / Office	n/a	(1)	0.20	0.50
Advanced Manufacturing	n/a	n/a	0.15	0.50
Commercial	7.0 DU/AC	15 DU/AC	0.20	0.50
Residential	0.20 DU/AC	4.0 DU/AC		

## Exhibit 3 Proposed Development Program Policies for EOMU Areas

(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 Area E.

### **Policy 10.3.5.3 Area E Mix of Uses**

Area E 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 Area E Total Acres)</u>		
	<u>30%</u>	<u>---</u>
<u>Buildable Area</u> <u>(Percentage of Area E Acres Net of Open Space)</u>		
<u>Commercial</u>	<u>0%</u>	<u>10%</u>
<u>R&amp;D / Office</u>	<u>0%</u>	<u>10%</u>
<u>Manufacturing</u>	<u>0%</u>	<u>10%</u>
<u>Residential</u>	<u>0%</u>	<u>93%</u>
<u>Recreation (2)</u>	<u>5%</u>	<u>---</u>
<u>Civic</u>	<u>2%</u>	<u>---</u>

(1) An applicant may provide additional open space above and beyond the minimum open space requirement as a part of the DSAP process, however, the minimum open space standard reflects the requirement of the comprehensive plan with regard the amount of open space that shall be provided within Area E.

(2) Active Recreation uses are permitted to occur within the 100 year Floodplain. These recreational lands are supplemental to the passive recreation uses provided within the EASP Conservation Land Use.

## **Exhibit 4 List of Alachua County Comprehensive Plan Policies Referenced in the Natural Resource Analysis Section**

**COSE Policy 3.1.1** Conservation areas shall consist of natural resources that, because of their ecological value, uniqueness and particular sensitivity to development activities, require stringent protective measures to sustain their ecological integrity. These areas shall include:

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

**COSE Policy 3.6.3** Parcels that include or are adjacent to conservation or preservation areas shall not receive planning and zoning designations that are higher in density or intensity than the currently adopted designations unless adequate natural resources protection is ensured.

### **Soils:**

**COSE Policy 4.2.1** Characteristics of soil suitability and capability shall be considered in determining appropriate land uses. Preliminary recommendations concerning soil suitability can be found in the Alachua County Soil Survey prepared by the United States Department of Agriculture Natural Resources Conservation Service (USDA NRCS). To insure that the soils at the development site can support the development, the County will require the developer to submit detailed information on soils which may require an independent soil analysis with detailed information on soils.

**COSE Policy 4.2.5** Development shall be designed to include retention of the natural character of seepage slopes and shallow ground water tables that have been demonstrated to be essential to the hydrologic support of associated conservation areas. Specific standards to accomplish this shall be included in the development regulations. In the interim, the Development Review Committee shall require measures that execute this policy.

## **Exhibit 4 List of Alachua County Comprehensive Plan Policies Referenced in the Natural Resource Analysis Section**

### **Strategic Ecosystems:**

**COSE Policy 4.10.1** Conserve strategic ecosystems that are determined through ground-truthing using the KBN/Golder report as a guide to maintain or enhance biodiversity based on an overall assessment of the following characteristics:

- (a) Natural ecological communities that exhibit:
  - (1) Native biodiversity within or across natural ecological communities.
  - (2) Ecological integrity.
  - (3) Rarity.
  - (4) Functional connectedness.
- (b) Plant and animal species habitat that is:
  - (1) Documented for listed species.
  - (2) Documented for species with large home ranges.
  - (3) Documented as a special wildlife migration or aggregation site for activities such as breeding, roosting, colonial nesting, or over-wintering.
  - (4) High in vegetation quality and species diversity.
  - (5) Low in non-native invasive species.
- (c) Size, shape, and landscape features that allow the ecosystem to be restored to or maintained in good condition with regular management activities, such as prescribed burning, removal of exotic vegetation, or hydrological restoration.

The Alachua County 2001 digital orthophotographic series (for purposes of this policy, the date of this photography is March 1, 2001) shall presumptively establish the baseline condition of the strategic ecosystem property as of the effective date of this policy. The County shall adopt land development regulations that set forth additional guidance for the determination of whether and the extent to which strategic ecosystems exist on a property.

**COSE Policy 4.10.3** If an applicant seeks development prior to the County's creation of a special area plan for a particular strategic ecosystem, the applicant has two avenues for pursuing development. A special area study may be conducted at the applicant's expense. Alternatively, if the applicant demonstrates that the ecological integrity of the strategic ecosystem will be sufficiently protected, the applicant may proceed according to the clustering provisions in policies under Objective 6.2 of the Future Land Use Element.

## **Exhibit 4 List of Alachua County Comprehensive Plan Policies Referenced in the Natural Resource Analysis Section**

**COSE Policy 4.10.4** Management strategies for strategic ecosystems shall be developed with landowners in conjunction with special area plans or cluster developments and may include, but are not limited to:

- (a) Prescribed burning.
- (b) Control of invasive species.
- (c) Silvicultural activities according to BMPs, with particular emphasis on maintenance and improvement of water quality, biological health, and the function of natural systems.
- (d) Reduction in the intensity of site preparation activities, including bedding and herbicide application.
- (e) Provision for listed species habitat needs, including restricting, at appropriate times, intrusions into sensitive feeding and breeding areas.
- (f) Cooperative efforts and agreements to help promote or conduct certain management activities, such as cleanups, maintenance, public education, observation, monitoring, and reporting.
- (g) Land acquisition.

**COSE Policy 4.10.5** Each strategic ecosystem shall be preserved as undeveloped area, not to exceed 50% of the upland portion of the property without landowner consent and in accordance with the following:

- (a) Upland areas required to be protected pursuant to policies for significant geological features and wetland and surface water buffers shall be counted in calculation of the 50% limitation, however, the extent of protection of significant geological features and wetland and surface water buffers shall not be reduced by this limitation.
- (b) This limitation shall not apply to 100-year floodplains and wellfield protection areas, which are addressed independently through policies under Objectives 4.8 and 4.5, respectively.
- (c) This limitation shall not restrict in any way state and federal agency protections.

### **Surface Waters & Wetlands:**

**COSE Policy 4.6.4** The natural hydrologic character and function of surface waters, including natural hydroperiods, flows found in floodways, flows that connect wetlands with other wetlands and surface waters, and wildlife habitat and connectivity, shall be protected. Land

## **Exhibit 4 List of Alachua County Comprehensive Plan Policies Referenced in the Natural Resource Analysis Section**

development regulations shall specify criteria for site design including limits on and mitigation for filling and excavation. In addition, the County shall establish an appropriate review and approval process that provides for regulation of water control structures including but not limited to indirect impacts from land development activities.

**COSE Policy 4.6.16** Land uses that have the potential to pollute surface waters (are located adjacent to surface waters and that contribute significant nutrient loadings) shall be identified and regulated using the following measures to protect water quality and biological health.

- (a) Buffers to surface waters shall be increased for activities which have been associated with surface water quality and biological health problems such as landfills, composting facilities, wastewater treatment percolation ponds or rapid infiltration basins (RIBs), spray fields, golf courses, dairies, row crops, septage or biosolids land application sites, septage stabilization facilities, and onsite sewage treatment systems or septic systems.
- (b) The implementation of best management practices shall be required in buffers to surface waters to control nutrient loadings, including retrofitting if needed to maintain water quality and biological health.
- (c) The use of pesticides and fertilizers shall be discouraged in buffers.
- (d) The use of reclaimed water shall be regulated to conform with environmentally sound practices and not allowed to adversely impact surface water or groundwater by increasing nutrient concentrations. Nutrients present in the reclaimed water shall not be discharged in a manner that will cause impairment of surface waters, cause an imbalance of flora and fauna in the aquatic ecosystem, or cause eutrophication of the receiving waters. Land development regulations shall be adopted that include setbacks to surface waters for the use of reclaimed water for irrigation that are protective of the aquatic ecosystem.
- (e) All fill material used onsite shall be free of phosphatic Hawthorn Group sediments or other phosphorous rich materials that may leach phosphorus causing surface water quality degradation and lake eutrophication.
- (f) Any excavation that would lead to exposure of Hawthorn Group sediments or other phosphorus rich materials that could leach and adversely impact groundwater or surface water shall be mitigated by covering, backfilling or using other techniques to reduce phosphorus leaching.
- (g) Fertilizer shall be regulated in buffers to surface waters to ensure that excess nitrogen and phosphorus are not leached into surface water bodies causing water quality degradation and/or lake eutrophication.



## **Exhibit 4 List of Alachua County Comprehensive Plan Policies Referenced in the Natural Resource Analysis Section**

- (h) The use of performance based treatment systems may be required in highly sensitive areas, such as in proximity to Outstanding Florida Waters, impaired waters, in springsheds where karst features are prominent and conduit flow is known to exist, or where the lot sizes are small and do not allow for adequate nutrient reduction to be met at the property boundary. These systems shall be designed and permitted under a defined performance standard criterion (e.g. Secondary or Advanced Secondary treatment standards). This measurable performance standard can be adopted as a risk based mitigation strategy for site specific concerns.

**COSE Policy 4.7.1** Wetlands of all sizes shall be regulated without exception.

**COSE Policy 4.7.4** Development activity shall not be authorized in wetlands or wetland buffers except when all of the following conditions are met:

- (a) The applicant has taken every reasonable step to avoid adverse impact to the wetland and buffer; and
- (b) The applicant has taken every reasonable step to minimize adverse impact to the wetland and buffer; and
- (c) The applicant has provided appropriate mitigation for adverse impact to the wetland and buffer; and
- (d) The applicant shows that one of the following circumstances applies:
  - (1) Minimal impact activity; or
  - (2) Overriding public interest; or
  - (3) All economically beneficial or productive use of the property is otherwise precluded.

The development impact area shall not exceed the rate of one-half (½) acre per ten acres of conservation area, including the footprint of principal and accessory structures and parking, allowing for reasonable access. Notwithstanding the above, mitigated impact may be allowed to any isolated poor quality wetland that is less than 0.25 acre in size, provided the total impact area is not greater than or equal to 0.25 acre per development. Poor quality shall be defined in the land development regulations based on factors relative to ecological value.

**COSE Policy 4.7.7** Any development activity permitted within an onsite, or affecting an offsite, wetland or buffer shall be mitigated at the expense of the landowner. Mitigation proposals shall be submitted to the BoCC for review in the form of a mitigation and monitoring plan, according to a natural resources permit process to be articulated in the land development regulations. Final Board of County Commissioners approval of a mitigation and monitoring plan

## **Exhibit 4 List of Alachua County Comprehensive Plan Policies Referenced in the Natural Resource Analysis Section**

must be received prior to wetland or buffer alteration. The Land Development Regulations shall authorize that the Board of County Commissioners shall approve, deny or approve with conditions any natural resources permit. In order to be considered, the mitigation and monitoring plan must ensure the long term viability of the mitigation project, advance the County's natural resources conservation objectives and policies, and meet the following minimum guidelines:

- (a) Mitigation shall include any one or a combination of: monetary compensation, or acquisition, restoration, enhancement, or preservation of wetlands, other surface waters or uplands.
- (b) Preservation shall not be considered when protection of the resource proposed for preservation is already ensured by federal, state, water management district, or local regulations.
- (c) Mitigation shall be determined by applying the Uniform Mitigation Assessment Method (UMAM), pursuant to Chapter 62-345, F.A.C.
- (d) Mitigation shall be permitted only within the boundaries of Alachua County and, to the maximum extent practicable, within the local watershed in which the impact occurs.
- (e) Alachua County shall prioritize receiving areas for mitigation within the county, and investigate the feasibility of implementing a local mitigation banking system.
- (f) Wetland mitigation activity conducted by a public agency may not be utilized for wetland mitigation credit by private persons unless approved by Alachua County.
- (g) The landowner shall post a performance bond or similar financial guarantee to assure implementation of the mitigation and monitoring plan.
- (h) No mitigation credits will be given for onsite preservation of wetlands.

## **Exhibit 4 List of Alachua County Comprehensive Plan Policies Referenced in the Natural Resource Analysis Section**

### **Floodplains:**

#### **COSE OBJECTIVE 4.8 - FLOOD PLAINS AND FLOODWAYS**

Protect and maintain the natural functions of floodplains, floodways, and all other natural areas having hydrological characteristics of the one hundred (100)-year flood elevation. Natural functions include water purification, flood hazard mitigation, water supply, and wildlife habitat and connectivity.

**Policy 4.8.1** The County shall encourage and contribute to watershed management through a variety of programs to include education initiatives, enforcement of wetland and surface water setbacks, and interagency partnerships and workshops.

**Policy 4.8.2** The County shall encourage watershed planning and shall:

- (a) Define 100-year floodplains and floodways as conservation areas;
- (b) Continue to maintain, and enhance where possible, the current biodiversity in floodplains of the County;
- (c) Continue to cooperate with the Water Management Districts and other appropriate agencies in expanding or enhancing existing natural habitats associated with floodplains;
- (d) Recognize floodplains in the land development regulations as unique resources requiring protection and conservation;
- (e) Develop specific criteria for slope protection and erosion control in floodplains and along natural banks and shores; and
- (f) Enforce erosion control regulations to reduce sedimentation in floodplains resulting from development activities.

**Policy 4.8.9** Shallow wells, solid waste disposal sites, septic tank drainfields, and sewage treatment plants shall be located to prevent inundation by floodwaters.