

SUFFICIENCY RESPONSE FOR: ENVISION ALACHUA SECTOR PLAN / COMPREHENSIVE PLAN AMENDMENT

MARCH 27, 2014

The Alachua County Staff prepared a letter dated February 14, 2014 requesting additional information as a part of their review and analysis for the Envision Alachua Sector Plan/Comprehensive Plan Amendment. This letter included nine (9) sections that have been lettered A – I in the attached response document for ease of future reference and response and included the following:

- A. *Sector Plan Statutory Requirements (163.3245, F.S.)*
 - A.1.a. *Employment Oriented Mixed Use (EOMU) definition: location, type, density and intensity of uses for the purpose of analyzing impacts on natural resources, transportation systems, and public facilities.*
 - A.1.b. *Hawthorne Reserve Area land use definition: proposed uses, intensities and densities and design.*
 - A.2. *Land Use Definitions (General): Minimum densities and intensities for land use categories*
 - A.3. *Growth Allocation: Proportion of County growth allocated to Envision Alachua through the planning period.*

- B. *Florida Statutes 163 Part II Comprehensive Plan Amendment Requirements*
 - B.a. *Impact of Amendment: Information to determine the impact of the amendment on public facilities, services, water supply, and natural resource.*
 - B.b. *Required Maps: Clarification of Policy 10.2.1 regarding required maps and map components.*

- C. *Comprehensive Plan Consistency Analysis*
 - Future Land Use Element Consistency: Consistency with first two General Strategies listed in the Future Land Use Element.*

- D. *Public Schools Analysis*
 - Current Available Data and Methodology: Update public school capacity analysis to 1) assess capacity within established School Concurrency Service Areas and 2) use current school multipliers and capacity numbers available from the School Board.*

- E. *Transportation*
 - E.1. *Study Area: Update analysis to apply 5% text to facilities outside the County jurisdiction where applicable.*
 - E.2. *Model Network Modification: Local road network.*
 - E.3. *LTMP Land Use Allocations: Transportation analysis consistent with the maximum land uses allowed under the proposed policies.*
 - E.4. *Other Modeling Issues*
 - E.4.a. *Centroid Connection: Justification for model choice for connection to internal road rather than CR 234.*
 - E.4.b. *ATYPE = 52: Justification for using rural facility type.*
 - E.5. *Analysis: Identify remedies to deficiencies identified by the analysis in the form of capital improvements or transit service and revised proposed policies accordingly.*

F. *Natural Resources*

F.1. Listed Specific Inventory: Revised analysis to apply the county's definition of "listed species"

F.2. Critical Ecological Corridors Map: Include analysis of this map.

F.3. Water Quality: Identify how the applicant will address water quality issues.

F.4. Wetlands: Include other available electronic data sets (in addition to the SJRWMD) in this analysis.

G. *Impacts on the Cost of Housing*

Section 402.05 (a) 18 Requirements: Provide evaluation of impacts as required by the Alachua County Land Development Code.

H. *Undefined terms*

H.1. Indirect Conflict

H.1.a. Identify current policies of the Plan that would not apply with the Planning Area.

H.2. Agro-industrial

H.2.a. Provide examples of agro-industrial uses.

H.3. Forestry / Silviculture: Explain the difference.

H.4. Resource Based Open Space (RBOS)

I. *General Edits*

A. SECTOR PLAN STATUTORY REQUIREMENTS (163.3245, F.S.)

STAFF COMMENT A.1.a:

Employment Oriented Mixed Use (EOMU) definition

The application generally depicts the urban, agricultural, rural, and conservation land uses and only very broadly specifies allowed uses in the four land use categories. The entire range of urban uses is listed as allowed throughout the 12,000+ acre Employment Oriented Mixed Use areas shown on the proposed Future Land Use Map for the Envision Alachua Sector Plan (EASP). In order to analyze the impact of this proposal on natural resources, transportation systems, and issues such as public facility needs including schools, fire/rescue, and EMS, more information is needed on the proposed location, type, density and intensity of uses within areas defined as Employment Oriented Mixed Use.

COMMENT SUMMARY:

A.1.a. Provide additional information regarding the location, type, density and intensity of uses for EOMU for the purpose of analyzing impacts on natural resources, transportation systems, and public facilities.

RESPONSE

Staff comment A.1.a references the statutory requirements for Sector Plans (163.3245(3)(a)1, F.S.) and indicates that the data is insufficient for the purposes of analyzing the impacts on various resources and services in the manner required by state statute. This comment is repeated in Staff Comment B.a. which references the requirements for Comprehensive Plan Amendments (163.3177, F.S.).

To provide an adequate response to both of these requests for additional information, this response will discuss each resource and facility separately and will

- Identify the statutory requirements for analysis for both the Sector Planning process and the Comprehensive Plan Amendment process;
- Identify the current data and analysis provided in the amendment application as submitted;
- Identify any policies within the proposed text amendment that establish standards, guidelines or other performance measures to insure the adequate review and protection of natural resources or the adequate review and provision of required services and facilities: and
- Identify and provide any data, analysis or other additional information that would be required to conduct the necessary review as required by statute and address the related requirements.

The general requirement for the provision of data and analysis for Sector Plans is as follows (underline added):

163.3245(3)(a)1, F.S

- (a) *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. *A framework map that, at a minimum, generally depicts areas of urban, agricultural, rural, and conservation land use; identifies allowed uses in various parts of the planning area; specifies maximum and minimum densities and intensities of use; and provides the general framework for the development pattern in developed areas with graphic illustrations based on a hierarchy of places and functional place-making components.*

RESPONSE (CONT.): STAFF COMMENT A.1.a.

Provide additional information regarding the location, type, density and intensity of uses for EOMU for the purpose of analyzing impacts on natural resources, transportation systems, and public facilities.

NATURAL RESOURCES

1. Statutory Requirements. The relevant statutory requirements for data and analysis with regard to Natural Resources are as follows:

163.3245(3)(a)5, F.S (Sector Plans)

5. *A general identification of 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.*

163.3177 (6)(a)8.b, F.S. (Comprehensive Plan Amendments)

8. *Future land use map amendments shall be based upon the following analyses:*
 - 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.*

With regard to natural resources, the requirements reflect that the depth of the data and analysis required is specifically related to the ability to 1) determine the suitability of the amendment for the proposed use based upon the natural resource characteristics of the site and 2) establish policies that will set forth the procedures for the protection or conservation of specific resources within the context of the Sector Planning Area.

2. Data & Analysis. The current amendment application provides the data and analysis for natural resources which includes the updated Environmental Data and Analysis Report included in this submittal, the Historic and Cultural Resources Data and Analysis Report, relevant sections of the Land Use Data and Analysis, and relevant sections of the Phase I Vision Document. The Environmental Report includes a general indication of each environmental resource: ecological setting, physiography, geology, topography, soils, vegetative communities, significant wetlands and surface waters, 100-year floodplain, strategic ecosystems, significant geologic feature, high aquifer recharge areas, wellfield protection areas, listed species potential occurrence, protected wildlife species (amphibians and reptiles, birds, and mammals), listed plants, Florida Natural Areas Inventory Species, and wildlife habitat and biodiversity models. Section 2.0 of the Environmental Report documents the overall environmental plan for the EASP including the process that led to development of the Long Term Master Plan Framework Map included in the application; and Section 4.0 also includes a synopsis of the environmental plan. The Land Use Data and Analysis Report includes a summary of the land planning process used in developing the Long Term Master Plan Framework Map including the Task Force Vision, the regional context, the Alachua County context, and the east Alachua context, the land use strategy, and the sector plan principles to limit urban sprawl, enhance opportunities for job creation, provide a range of housing types, protect wildlife and natural areas, promote efficient use of land and other resources, advance a more clean healthy environment, and create quality communities that promote multi-modal transport. The Phase I Summary, titled "Vision, Goals and Planning Principles", documents the Envision Alachua process of community participation that led creation of the Vision by the Task Force; this report includes the list of 15 goals, and associated planning principles for each goal, endorsed by the Task Force organized: economic development, agriculture, environmental conservation, water, energy and utilities, education, community planning, transportation, land use, health care, social and cultural development, recreation governance, planning process, and performance measurement.

3. Proposed Policies. The current amendment application includes specific policies that set forth the procedures for the protection or conservation of specific resources within the context of the Sector Planning Area. Specifically, the EASP provides alternate policies for the protection of conservation areas within the EA-EOMU Land Use because the existing policies do not anticipate development parcels on the scale of the EASP that can offer solutions that protect and enhance large natural systems of wetlands and uplands, rather than just protecting each wetland. Because the Urban Cluster has no large parcels that encompass landscape scale wetland ecosystems, the existing policies reflect protection of each wetland regardless of size.

RESPONSE (CONT.): STAFF COMMENT A.1.a.

Provide additional information regarding the location, type, density and intensity of uses for EOMU for the purpose of analyzing impacts on natural resources, transportation systems, and public facilities.

The amendment provides specific natural resource protection and development standards as part of the proposed map amendment and text amendment that considers the broader regional landscape setting within which the lands occur; protects key environmental linkages in the regional landscape through the adoption of an Envision Alachua Conservation Land Use (EA-CON) designation over 46,051 acres of land and requires an additional 30% open space (15% of which is to be Resource Based Open Space (RBOS)) within the urban mixed use district of EA-EOMU. In addition, the amendment requires that a management plan be prepared for the EA-CON and RBOS lands. The applicable policies include the following:

Policy 10.2.5. This policy establishes a Conservation land use (EA-CON) which is expressly delineated on the future land use map (as opposed to being defined by textual description and designated piecemeal after the fact) and which protects those lands by prohibiting residential uses, prohibiting transfers of density from these lands and limiting the uses within the Conservation land use in the same manner that is adopted in the Alachua County Comprehensive Plan (ACCP) with the following additions:

ACCP, Conservation Element, Policy 3.1.2

Within the EA-CON land use category ~~In conservation areas~~, silviculture uses employing the latest applicable best management practices of the Florida Department of Agriculture and Consumer Services shall be permitted, and the following uses, if otherwise consistent with the Comprehensive Plan, generally shall be permitted to the extent that they do not significantly alter the natural functions of the conservation area:

- (a) Public and private conservation, recreation and open space uses.
- (b) Public and private wildlife preserves, game management and refuge areas.
- (c) Mitigation Areas.
- (d) Water conservation and retention/detention areas that are determined to be appropriate for stormwater management.
- (e) Agricultural and Silvicultural uses, employing latest applicable best management practices.
- (f) Road crossings planned and designed using best management practices, including up to four crossings of Lochloosa Creek, to serve motorized vehicles, pedestrians, bicyclists, and utilities.

Policy 10.2.5.1 Conservation (EA-CON) Natural Resource Protection

Policy 10.2.5.2 Conservation (EA-CON) Timing of Conservation Covenants and Conservation Easements

Policy 10.2.5.3 Conservation (EA-CON) Management Plans

These policies establish the specific procedures for on-going protection of the resources within the EA-CON by requiring that a management plan be developed for these areas that establishes specific management goals and objectives which are consistent with respective habitat requirements and ecological communities, outline procedures and defines roles and responsibilities for managing these areas including the protection of species listed by FFWCC and USFWS. Specific minimum contents for the management plan are also included in these policies.

Policy 10.2.6.6 EA-EOMU Resource-Based Open Space (RBOS)

Policy 10.2.6.7 EA-EOMU RBOS Natural Resource Protection Mechanisms

Policy 10.2.6.8 EA-EOMU RBOS Ecological Monitoring

Policy 10.2.6.9 EA-EOMU RBOS Permitted Uses

Policy 10.2.6.10 EA-EOMU Wetlands Protection

Policy 10.2.6.11 EA-EOMU Wetlands Buffer Widths

Policy 10.2.6.12 EA-EOMU Development Activity

Policy 10.2.6.13 EA-EOMU Mitigation

Policy 10.2.6.14 EA-EOMU Floodplain

These policies establish standards and procedures for natural resource protection with the EA-EOMU future land use category using a 2 –pronged approach. The first prong is associated with the establishment of 15% of the total area with the EA-EOMU for resource protection as Resource-Based Open Space (RBOS), which would be designed to promote habitat connectivity and form linked networks to adjacent properties managed for conservation purposes and is allowed to include areas designated as flood plains, wetlands,

RESPONSE (CONT.): STAFF COMMENT A.1.a.

Provide additional information regarding the location, type, density and intensity of uses for EOMU for the purpose of analyzing impacts on natural resources, transportation systems, and public facilities.

mitigation areas, vegetative buffers, specialized habitat for flora or fauna, passive recreation areas and water resource development areas. The RBOS is not permitted to include individual yards, active open space or civic open space. The RBOS is also required to establish management plans as described in Policy 10.2.5.3. The second prong of natural resource protection in the EA-EOMU is associated with the general protection of resources overall. These include the protection of wetlands by requiring compliance with state and federal permitting requirements, further protecting those ecosystems from the potential of development impacts by complying with the buffers and minimum widths in Policy 10.3.2. that mirror the ACCP, Conservation Element Policy 3.6.8 with the following revision:

3.6.8 Development occurring along the edges of wetlands protected pursuant to state and federal environmental permits and other important natural resource areas identified during the DSAP process as entitled to protection conservation and preservation areas shall be designed to protect and minimize the impact of development on these conservation areas through the use of natural vegetative buffers.

(a) Buffer width shall be determined on a case-by-case basis depending on what is demonstrated to be scientifically necessary to protect the identified resource natural ecosystems from significant adverse impact. This determination shall be made in consideration of at least the following factors:

- 1) Type of development and associated potential for adverse site-specific and off-site impacts;*
- 2) Natural community type and associated hydrologic or management requirements;*
- 3) Buffer area characteristics and function;*
- 4) Presence of listed species of plants and animals.*

(b) Absent scientific information which demonstrates that a larger or smaller buffer width is appropriate, the following buffer widths shall apply for the resources set forth in the table below.

<i>Protected Resource</i>	<i>Buffer Distance (feet)</i>
<i>Surface waters and wetlands less than or equal to 0.5 acre that do not include OFWs or listed animal species as described elsewhere in this table</i>	<i>50 average, 35 minimum</i>
<i>Surface waters and wetlands greater than 0.5 acre that do not include OFWs or listed animal species as described elsewhere in this table</i>	<i>75 average, 50 minimum</i>
<i>Areas where federally and/or state regulated vertebrate wetland/aquatic dependent animal species have been documented within 300 feet of a surface water or wetland</i>	<i>100 average, 75 minimum</i>
<i>Outstanding Florida Waters (OFWs)</i>	<i>150 average, 100 minimum</i>

** If the buffer precludes all economically viable use of a particular property, development may be allowed within the buffer in accordance with policy 3.6.5, and where applicable, policies 4.6.6 and 4.7.4.*

(c) Buffers shall be measured from the outer edge of the regulated wetland or water body protected resource.

The second prong of protection in the EA-EOMU also includes the protection of floodplains by establishing standards for these areas as well.

RESPONSE (CONT.): STAFF COMMENT A.1.a.

Provide additional information regarding the location, type, density and intensity of uses for EOMU for the purpose of analyzing impacts on natural resources, transportation systems, and public facilities.

- Policy 10.3.1** Conservation Covenant / Conservation Easement: Draft
- Policy 10.3.2** Protection of Important Natural Resource Area Edges
- Policy 10.3.3** Protection of Strategic Ecosystems
- Policy 10.3.4** Protection of Sinkhole Basin
- Policy 10.3.5** Cultural Resource Assessment

These policies are specific to the context of the Sector Planning Area inasmuch as they focus on the protection of regional scale conservation areas, corridors and linkages. This amendment represents a rare chance to design for ecological sustainability at a regional scale, thereby reducing landscape fragmentation, conserving ecosystem integrity, and providing a framework within which to design a compact urban footprint and incorporate infrastructure efficiently.

RESPONSE (CONT.): STAFF COMMENT A.1.a.

Provide additional information regarding the location, type, density and intensity of uses for EOMU for the purpose of analyzing impacts on natural resources, transportation systems, and public facilities.

WATER SUPPLY

1. Statutory Requirements. The relevant statutory requirements for data and analysis with regard to Water Supply are as follows:

163.3245(3)(a)2, F.S (Sector Plans)

2. *A general identification of the water supplies needed and available sources of water, including water resource development and water supply development projects, and water conservation measures needed to meet the projected demand of the future land uses in the long-term master plan.*

163.3177 (6)(a)2.d, F.S. (Comprehensive Plan Amendments)

2. *The future land use plan and plan amendments shall be based upon surveys, studies, and data regarding the area, as applicable, including:
d. The availability of water supplies, public facilities, and services.*

With regard to water supply, the requirements reflect the depth of the data and analysis required is specifically related to the availability of water supplies for the proposed amendment which would include the identification of the water resource development and water supply development project and conservation measures that would be necessary to insure that the projected demand for the Sector Planning Area is met.

2. Data & Analysis. The current amendment application provides the data and analysis for water supply within the Water Supply Data and Analysis Report which includes water principles focused on conservation, forecasted water supply needs, conservation actions, and potential water supply sources and development projects.

3. Proposed Policies. The current amendment application includes specific policies that set forth the procedures for the conservation and protection of water resources, which provides supplemental protection provisions that are not included in the ACCP and introduces the Conservation-first strategy for water supply. Specific water conservation measures that are provided for within the proposed policies include the use of large water storage facilities for water harvesting and capturing, a ban on the use of potable water for individual residences with the EA-EOMU, the requirement of “Florida Friendly” plant species for landscaping with a preference for native species, treated wastewater for reuse and groundwater recharge, and the use of community design features such as building design, hardscapes and landscapes to insure that the community lives within a specified water budget.

- Policy 10.4.1** Water Supply Strategy
- Policy 10.4.2** Conservation – first Strategies for Water Supply
- Policy 10.4.3** Natural System Needs
- Policy 10.4.4** Wastewater as a Water Source
- Policy 10.4.5** Water Quality Improvement

RESPONSE (CONT.): STAFF COMMENT A.1.a.

Provide additional information regarding the location, type, density and intensity of uses for EOMU for the purpose of analyzing impacts on natural resources, transportation systems, and public facilities.

As a clarification and direct statement of the intentions regarding the water supply strategy within EA-EOMU, as opposed to the Agricultural and Rural land use designations, a revision to Policy 10.4.1 is proposed.

Policy 10.4.1 Water Supply Strategy

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

- a. *The use of large water storage facilities for water harvesting and capture shall be encouraged;*
- b. *State-of-the-art system components (e.g., water recycling) shall be incorporated where appropriate and feasible;*
- c. *Residential lots within the EA-EOMU shall not be irrigated with potable water except for a limited period during the initial establishment of landscaping;*
- d. *The priority for the use of reclaimed water shall be given to environmental restoration projects, industrial users and agricultural users;*
- e. *There shall be no individual wells for individual residences or businesses within the EA-EOMU. All wells within the EA-EOMU and the EA-AG shall be ~~regulated~~ monitored as part of the utility system;*
- f. *The use of "Florida Friendly" plant species shall be required for landscaping within the EA-EOMU, with a preference for native species;*
- g. *All Agriculture and Silviculture activities shall follow the most recent applicable best management practices.*

RESPONSE (CONT.): STAFF COMMENT A.1.a.

Provide additional information regarding the location, type, density and intensity of uses for EOMU for the purpose of analyzing impacts on natural resources, transportation systems, and public facilities.

TRANSPORTATION SYSTEMS

1. Statutory Requirements. The relevant statutory requirements for data and analysis with regard to Transportation Systems are as follows:

163.3245(3)(a)3, F.S (Sector Plans)

3. *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.*

163.3177 (6)(a)2.d, F.S. (Comprehensive Plan Amendments)

2. *The future land use plan and plan amendments shall be based upon surveys, studies, and data regarding the area, as applicable, including:
d. The availability of water supplies, public facilities, and services.*

With regard to transportation systems, the requirements reflect the depth of the data and analysis required is specifically related to the general identification of transportation facilities necessary to serve the long-term master plan and the availability of such facilities for the proposed amendment.

2. Data & Analysis. The current amendment application provides the data and analysis for transportation facilities in the revised Transportation Data and Analysis Report included in this submittal. This report identifies future traffic demands, and improvement needs in 2035 with approval of the EASP; and identifies potential road improvements for buildout of the EASP. The applicant has prepared supplemental data and analysis in response to this comment and provides the data and analysis for transportation facilities in the attached document.

RESPONSE (CONT.): STAFF COMMENT A.1.a.

Provide additional information regarding the location, type, density and intensity of uses for EOMU for the purpose of analyzing impacts on natural resources, transportation systems, and public facilities.

WATER & WASTEWATER FACILITIES

1. Statutory Requirements. The relevant statutory requirements for data and analysis with regard to Water and Wastewater facilities are as follows:

163.3245(3)(a)4, F.S (Sector Plans)

4. *A general identification of 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 be used to mitigate the impacts of future land uses on public facilities.*

163.3177 (6)(a)2.d, F.S. (Comprehensive Plan Amendments)

2. *The future land use plan and plan amendments shall be based upon surveys, studies, and data regarding the area, as applicable, including:
d. The availability of water supplies, public facilities, and services.*

With regard to water and wastewater facilities, the requirements reflect the depth of the data and analysis required is specifically related to the general identification of public facilities necessary to serve the long-term master plan and the availability of such facilities for the proposed amendment.

2. Data & Analysis. The applicant has prepared supplemental data and analysis for water and wastewater facilities in response to this comment, which includes estimated demands for 2035 and for buildout of the EASP, and identifies additional facility improvements needed to serve these demands. These are contained within the updated Public Infrastructure Data and Analysis Report that is part of this submittal.

RESPONSE (CONT.): STAFF COMMENT A.1.a.

Provide additional information regarding the location, type, density and intensity of uses for EOMU for the purpose of analyzing impacts on natural resources, transportation systems, and public facilities.

STORMWATER

1. Statutory Requirements. The relevant statutory requirements for data and analysis with regard to Stormwater facilities are as follows:

163.3245(3)(a)4, F.S. (Sector Plans)

4. *A general identification of 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 be used to mitigate the impacts of future land uses on public facilities.*

163.3177 (6)(a)2.d, F.S. (Comprehensive Plan Amendments)

2. *The future land use plan and plan amendments shall be based upon surveys, studies, and data regarding the area, as applicable, including:
d. The availability of water supplies, public facilities, and services.*

With regard to stormwater facilities, the requirements reflect the depth of the data and analysis required is specifically related to the general identification of public facilities necessary to serve the long-term master plan and the availability of such facilities for the proposed amendment.

2. Data & Analysis. The current amendment application provides the data and analysis for stormwater facilities which includes the mapping of elevations and watersheds in the Land Use Data and Analysis Report; the mapping of topography, soils, 100-year floodplain, and vegetative communities in the Environmental Resources Data and Analysis Report; and the strategy of an integrated water resources management system described in the Water Supply Data and Analysis Report. The current adopted level of service standards is a development-based standard that would apply to development within the Sector Plan. For additional discussion related to the stormwater strategy overall, please refer to the response prepared for Item F.3.

RESPONSE (CONT.): STAFF COMMENT A.1.a.

Provide additional information regarding the location, type, density and intensity of uses for EOMU for the purpose of analyzing impacts on natural resources, transportation systems, and public facilities.

SOLID WASTE

1. Statutory Requirements. The relevant statutory requirements for data and analysis with regard to Solid Waste facilities are as follows:

163.3245(3)(a)4, F.S. (Sector Plans)

4. *A general identification of 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 be used to mitigate the impacts of future land uses on public facilities.*

163.3177 (6)(a)2.d, F.S. (Comprehensive Plan Amendments)

2. *The future land use plan and plan amendments shall be based upon surveys, studies, and data regarding the area, as applicable, including:
d. The availability of water supplies, public facilities, and services.*

With regard to solid waste facilities, the requirements reflect the depth of the data and analysis required is specifically related to the general identification of public facilities necessary to serve the long-term master plan and the availability of such facilities for the proposed amendment.

2. Data & Analysis. The applicant has prepared supplemental data and analysis for solid waste facilities in response to this comment which includes an estimate of solid waste generation in 2035 and at buildout of the EASP as well as an assessment of existing capacity; these data and analyses are contained within the updated Public Infrastructure Data and Analysis Report included in this submittal.

RESPONSE (CONT.): STAFF COMMENT A.1.a.

Provide additional information regarding the location, type, density and intensity of uses for EOMU for the purpose of analyzing impacts on natural resources, transportation systems, and public facilities.

PARKS & RECREATIONAL FACILITIES

1. Statutory Requirements. The relevant statutory requirements for data and analysis with regard to Parks and Recreational facilities are as follows:

163.3245(3)(a)4, F.S (Sector Plans)

4. *A general identification of 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 be used to mitigate the impacts of future land uses on public facilities.*

163.3177 (6)(a)2.d, F.S. (Comprehensive Plan Amendments)

2. *The future land use plan and plan amendments shall be based upon surveys, studies, and data regarding the area, as applicable, including:
d. The availability of water supplies, public facilities, and services.*

With regard to parks and recreational facilities, the requirements reflect the depth of the data and analysis required is specifically related to the general identification of public facilities necessary to serve the long-term master plan and the availability of such facilities for the proposed amendment.

2. Data & Analysis. . The applicant has prepared supplemental data and analysis for parks and recreational facilities in response to this comment which includes an estimate of the number of acres of activity-based and resource based recreational facilities needed to serve the population of the EASP in 2035 and at buildout, in accordance levels of service in the ACCP, and a comparison of the need with existing capacity. These are included in within the updated Public Infrastructure Data and Analysis Report included in this submittal.

RESPONSE (CONT.): STAFF COMMENT A.1.a.

Provide additional information regarding the location, type, density and intensity of uses for EOMU for the purpose of analyzing impacts on natural resources, transportation systems, and public facilities.

SCHOOLS

1. Statutory Requirements. The relevant statutory requirements for data and analysis with regard to Schools are as follows:

163.3245(3)(a)4, F.S (Sector Plans)

4. *A general identification of 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 be used to mitigate the impacts of future land uses on public facilities.*

163.3177 (6)(a)2.d, F.S. (Comprehensive Plan Amendments)

2. *The future land use plan and plan amendments shall be based upon surveys, studies, and data regarding the area, as applicable, including:
d. The availability of water supplies, public facilities, and services.*

With regard to schools, the requirements reflect the depth of the data and analysis required is specifically related to the general identification of public facilities necessary to serve the long-term master plan and the availability of such facilities for the proposed amendment.

2. Data & Analysis. The applicant has prepared supplemental data and analysis for school facilities in response to this comment which includes an estimate of the school-age population within the EASP in 2035 and at buildout of the EASP, as well as an analysis of the capacity of existing schools that serve the EOMU lands; these are contained within the updated Public Infrastructure Data and Analysis Report included in this submittal.

RESPONSE (CONT.): STAFF COMMENT A.1.a.

Provide additional information regarding the location, type, density and intensity of uses for EOMU for the purpose of analyzing impacts on natural resources, transportation systems, and public facilities.

FIRE/RESCUE AND EMS

1. Statutory Requirements. The relevant statutory requirements for data and analysis with regard to Fire/Rescue and EMS are as follows:

163.3245(3)(a)4, F.S. (Sector Plans)

4. *A general identification of 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 be used to mitigate the impacts of future land uses on public facilities.*

163.3177 (6)(a)2.d, F.S. (Comprehensive Plan Amendments)

2. *The future land use plan and plan amendments shall be based upon surveys, studies, and data regarding the area, as applicable, including:
d. The availability of water supplies, public facilities, and services.*

With regard to fire/rescue and EMS, the requirements reflect the depth of the data and analysis required is specifically related to the general identification of public facilities necessary to serve the long-term master plan and the availability of such facilities for the proposed amendment.

2. Data & Analysis. The applicant has prepared supplemental data and analysis for Fire/Rescue and EMS facilities in response to this comment which includes an analysis of facilities needed to serve the people and property that would occupy the EASP in 2035 and at buildout, based on level of service standards in the ACCP, as found in the updated Public Infrastructure Data and Analysis Report included in this submittal.

A. SECTOR PLAN STATUTORY REQUIREMENTS (163.3245, F.S.)

STAFF COMMENT A.1.b:

Hawthorne Reserve Area definition

In addition, there are policies defining how development incorporating these uses is to be designed throughout the Employment Oriented Mixed Use areas of the EASP except within the significant portion of the proposal within the Hawthorne Reserve Area. More information is needed on the proposed uses, intensities and densities, and design of this area of the EASP.

COMMENT SUMMARY:

A.1.b. Provide additional information regarding the proposed uses, intensities and densities and design for the Hawthorne Reserve Area.

RESPONSE

The proposed uses, intensities and densities described for the EA-EOMU land use designation are intended to apply within the Hawthorne Reserve Area. With regard to design standards for this area, it is intended that this area act as an extension of the existing and planned urban development patterns associated with the City of Hawthorne. As a clarification and direct statement of these intentions, the addition of an ADDITIONAL policy, Policy 10.2.6.15.1 is proposed.

Policy 10.2.6.15.1 EA-EOMU Design Standards for the Hawthorne Reserve Area

The Hawthorne Reserve Area shall be designed as an extension of the existing and planned urban patterns of development that are adjacent to this site. Site and building design, including scale, shall create a pedestrian-, bicycle- and transit-friendly environment. Architectural and site design techniques shall be used to promote walkable and bikeable communities.

- a. *The Hawthorne Reserve Area shall be consistent with the EA-EOMU requirements regarding permitted uses, minimum and maximum densities and intensities of use and the required mix of uses as defined in policies 10.2.6 and 10.2.6.3.*
- b. *The Hawthorne Reserve Area shall be consistent with the EA-EOMU requirements regarding the overall minimum open space requirements for the EA-EOMU as defined in policy 10.2.6.3. Although this requirement shall be measured over the entire land area assigned EA-EOMU as provided in policy 10.2.6.3, the lands within the Hawthorne Reserve Area shall support the satisfaction of this requirement by providing a minimum of 20% of the Hawthorne Reserve Area as open space.*
- c. *The site design shall conform to a compact development pattern, with opportunities for shopping and workplaces near residential neighborhoods;*
- d. *The site layout and orientation of buildings shall create a development that is designed around the pedestrian and bicyclist, creates an environment that promotes walking and bicycling as an alternative means of mobility, accommodates transit and connects activities within the EA- EOMU as well as to the adjacent urban areas within Hawthorne;*

RESPONSE (CONT.): STAFF COMMENT A.1.b.

A.1.b. Provide additional information regarding the proposed uses, intensities and densities and design for the Hawthorne Reserve Area.

PROPOSED POLICY 10.2.5.15.1 (CONT.)

RESPONSE

- e. *The location of residential uses within the Hawthorne Reserve will be located within a ¼ mile walking distance of recreation / open space / conservation lands. The area south of SR 20 shall be predominantly residential uses with support commercial uses along SR20. See Exhibit 10.6, Conceptual Site Design for Hawthorne Reserve Area.*

A. SECTOR PLAN STATUTORY REQUIREMENTS (163.3245, F.S.)

STAFF COMMENT A.2:

Land Use Definitions (General)

The application lists maximum densities and intensities along with a set of policies as to how these maximums may be exceeded, but minimum densities and intensities are not included.

Policy 10.6.6 states that “The DSAP shall provide detailed identification and analysis of the maximum and minimum densities and intensities of use and the distribution, extent, and location of future land uses.” Please provide this information as part of the application for the long-term master plan as required by statute.

COMMENT SUMMARY:

A.2. Provide minimum densities and intensities for land use categories.

RESPONSE

There are four future land use designations proposed as a part of this plan amendment application: Rural (EA-RUR); Agriculture (EA-AG); Conservation (EA-CON) and Employment Oriented Mixed Use (EA-EOMU).

EA-RUR: As provided in proposed Policy 10.2.3, the definition and standards for the EA-RUR future land use category are consistent with and mirror the Rural/Agriculture future land use category as currently defined in the Alachua County Comprehensive Plan, Future Land Use Element, Objective 6.2. The regulations for density and intensity for the EA-RUR future land use category is the same as is currently regulated for the county’s adopted Rural/Agriculture category which is a maximum residential density of one dwelling unit per five acres.

Policy 10.2.3 Rural (EA-RUR) – excerpt with emphasis added

The definition and standards of the EA-RUR land use category shall be consistent with the Rural/Agriculture land use category described in Objective 6.2 in effect as of the date of adoption of this amendment and shall have the density, intensity, and uses as follows:

*a. Areas identified as EA-RUR on the Future Land Use Map are for agricultural activities including forestry and other agricultural uses, (...) **New residential uses at a maximum density of one dwelling unit per five acres (...)***

EA-AG: As provided in proposed Policy 10.2.4, the EA-AG future land use category differs from the current agriculture related future land use category of the Alachua County Comprehensive Plan, the combined Rural/Agriculture category by restricting the residential density to a maximum of one dwelling unit per 40 acres (as opposed to the one dwelling unit per five acres permitted under the county’s current Rural/Agriculture future land use designation).

Policy 10.2.4 Agriculture (EA-AG) – excerpt with emphasis added

*Permitted uses with the EA-AG land use category on the Future Land Use Map include agricultural activities including forestry; silviculture; (...) **New residential uses at a maximum density of one dwelling unit per 40 acres shall be permitted.***

RESPONSE (CONT.): STAFF COMMENT A.2.

A.2. Provide minimum densities and intensities for land use categories.

RESPONSE

EA-CON: As provided in proposed Policy 10.2.5, residential uses are expressly prohibited within the EA-CON future land use category.

Policy 10.2.5 Conservation (EA-CON) excerpt

Lands assigned the EA-CON land use category shall not be permitted residential uses, and no transfer of density shall be allowed from lands designated as EA-CON.

EA-EOMU: As required for a mixed use future land use category per Chapter 163.3177(6)(a)3.h, proposed Policy 10.2.6.3 provides the percentage distribution among the mix of uses as well as both a minimum and maximum density for each use. As further clarification of this intent, a proposed revision of the proposed policy is provided below.

Chapter 163.3177(6)(a)3.h, Florida Statutes

h. Provide guidelines for the implementation of mixed-use development including the types of uses allowed, the percentage distribution among the mix of uses, or other standards, and the density and intensity of each use.

Policy 10.2.6.3 EA-EOMU Mix of Uses

The maximum density and intensity for each use within EA-EOMU is provided in the table below which shall be used for the purposes of measuring compliance with this policy for all of the lands assigned the EA-EOMU future land use designation as a whole. The lands within the EA-EOMU shall be developed to accommodate a composite land use mix over the entire land area assigned EOMU as described in Policy 10.1.4 and the density and intensities described below. The specific land use mix of an individual DSAP application shall include provisions for the specific mix within the DSAP to be determined at the time of DSAP approval.

<u>Use</u>	<u>Density</u> <i>(Dwelling Units / Gross Residential Acre)²</i>		<u>Intensity</u> <u>FAR</u>		<u>Land Area</u>
	<u>Max</u>	<u>Min</u>	<u>Max</u>	<u>Min</u>	
	<u>R&D / Office</u>	<u>(1)</u>	<u>n/a</u>	<u>2.0</u>	
<u>Advanced Manufacturing</u>	<u>(1)</u>	<u>n/a</u>	<u>2.0</u>	<u>0.15</u>	
<u>Residential</u>	<u>25</u>	<u>3.0</u>			
<u>Commercial</u>	<u>(1)</u>	<u>n/a</u>	<u>2.0</u>	<u>0.25</u>	
<u>Open Space (Minimum)³</u>					
- <u>RBOS⁴</u>	<u>---</u>	<u>----</u>	<u>----</u>	<u>----</u>	<u>15%</u>
- <u>Additional Open Space</u>					<u>15%</u>

¹ There is no maximum density within vertically mixed-use structures. The maximum residential development is limited by the overall development program, Policy 10.1.4.

² Gross Residential acreage is defined as the total parcel area used for the development of residential housing units.

³ The County shall not require more than the minimum open space required.

⁴ RBOS is Resource Based Open Space, See Policy 10.2.6.6.

RESPONSE (CONT.): STAFF COMMENT A.2.

A.2. Provide minimum densities and intensities for land use categories.

EA-EOMU - CONTINUED

RESPONSE

In addition to the specific table for density and intensity provided in Policy 10.2.6.3, the amount of development with the EA-EOMU is further defined, restricted and regulated through proposed Policy 10.1.4 as follows:

Policy 10.1.4 Development Program

The percentage distribution among the mix of uses within the EA-EOMU mixed use land use designation is provided through standards for measuring the maximum development program permitted within the Envision Alachua Planning Area which shall be based upon the following:

- a. *Maximum Development Program Baseline.*

<i>Residential:</i>	<i>10,500 homes*</i>
<i>Non-residential:</i>	<i>15.5 million square feet**</i>

(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 to subareas of the Planning Area through the Detailed Specific Area Plan (DSAP) process (See Objective 10.6). Over time, unused allocations shall not be deemed to be extinguished as subareas "build-out" and shall be permitted to shift to other subareas within the Planning Area through the process established for amendments to a DSAP(s).*
- e. ~~*Transfer of development rights. The development program shall be permitted to exceed the maximums set forth herein by an amount directly attributable to and resulting from the transfer of development rights for residential units or nonresidential floor area that may result from actions taken in the protection and conservation of other lands outside of the Envision Alachua Planning Area. For each acre of land acquired and placed under conservation easement in Alachua County, density may be increased 1 du or intensity may be increased 2,500-SF.*~~
- f. *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.*

Please note that the staff has also commented on the provisions associated with subsection e. Transfer of development rights. In response to these questions, this section is proposed to be deleted from the policy.

A. SECTOR PLAN STATUTORY REQUIREMENTS (163.3245, F.S.)

STAFF COMMENT A.3:

Growth Allocation

Section 163.3245 (a), F.S. states that the long-term master plan shall specify the projected population within the planning area during the chosen planning period, and may include a phasing or staging schedule that allocates a portion of the local government's future growth to the planning area through the planning period. The population projections identified on page 1 of the "Industrial Lands Needs Analysis" are not the most recent projections from BEBR. These projections appear to be based on the BEBR Medium projections for years 2008-2035, published in March 2009. The most recent projections, published in March 2013, are significantly lower than the projections from March 2009. Please update the population projections based on current Office of Economic and Demographic Research projections as required by the Sector Plan statute, and Chapter 163.3177, F.S. The population projections for the planning area appear to be based solely on multiplying persons per household by the number of residential units proposed. Please indicate the proportion of Alachua County's future growth that would be allocated to the Envision Alachua planning area through the planning period.

COMMENT SUMMARY:

A.3. Identify the proportion of County growth allocated to Envision Alachua through the planning period.

RESPONSE

The population projections have been updated as requested and are provided in an updated "Industrial Lands Needs Analysis" as attached.

For the purposes of preparing a Sector Plan, Chapter 163.3245(3)(a)7, F.S. provides that the long-term master plan "may" include phasing or staging that allocates a portion of the local government growth through the planning period. This amendment is not required to do that and does not attempt to do that.

In addition, the statute also provides that the long-term master plan is not required to demonstrate need based upon projected population growth or any other basis:

*Chapter 163.3245(3)(a)7, Florida Statutes **Emphasis Added***

*7. Identification of general procedures and policies to facilitate intergovernmental coordination to address extrajurisdictional impacts from the future land uses. A long-term master plan adopted pursuant to this section 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, and **may include** a phasing or staging schedule that allocates a portion of the local government's future growth to the planning area through the planning period. **A long-term master plan adopted pursuant to this section is not required to demonstrate need based upon projected population growth or on any other basis.***

As a part of the data and analysis for this plan amendment application, a document was submitted entitled "Plum Creek, UF, and Economic Growth in the Gainesville Region" prepared by Jim Dewey, Director Economic Analysis Program Bureau of Economic and Business Research University of Florida, Dave Denslow, Professor Emeritus Department of Economics University of Florida and Ray Schaub, Analyst Economic Analysis Program Bureau of Economic and Business Research University of Florida dated November 25, 2013. This document describes the role of creating a regional employment center at the scale proposed in this amendment as being a "game changer" for the Alachua County economy and as a response to large-scale technological change.

The following excerpts are relevant to this response.

RESPONSE (CONT.): STAFF COMMENT A.3.

A.3. Identify the proportion of County growth allocated to Envision Alachua through the planning period.

“Plum Creek, UF, and Economic Growth in the Gainesville Region”- CONTINUED

RESPONSE

Excerpts – Emphasis Added

Page 2, Summary

*The Envision Alachua Sector Plan will propose approval of 14 million square feet of R&D, Office, and Manufacturing space on land owned by Plum Creek in eastern Alachua County. This workspace will eventually support 30,000 (or more) employees. **The vision is to change the composition of the region’s economic base to complement the University of Florida (UF), rather than simply to depend on it, so that most of these employees constitute new base employment above current trends.** This report has two main purposes. First, to project economic growth in Gainesville and Alachua County under the status quo economic structure—in which growth depends almost entirely on traditional sources of UF revenue which are likely to remain under pressure in coming decades. Second, to determine whether it is reasonable to think base employment could expand enough to fill the space Plum Creek proposes to develop over the next half century if UF, Plum Creek, the state of Florida, and local citizens, businesses, and government collaborate to achieve that goal.*

Page 5, Introduction

*State and local policies and investments play a crucial role in shaping the level and composition of growth in the long run. The future level and composition of economic activity cannot be taken as an input to such decision making, but rather as one of the things to be decided. Planning to continue past practices so as to provide for meeting the demands of trend growth goes a long way toward ensuring the trend continues, while **planning to meet the needs of a region growing faster and better than trend helps ensure the region will indeed do so.** To put it succinctly, if Gainesville collectively chooses to grow better and faster than it has in the past, it is more likely to do so.*

*This approach to thinking about Alachua county’s potential growth differs from the simpler but widely and successfully used trend extrapolation approach. This approach is exemplified by Rayer, Smith, and Tayman (2009), who state (on page 776) “Though simple in design, trend extrapolation techniques have been found to produce forecasts of total population that are at least as accurate as those produced by more complex methods” By contrast Glaeser et al. (2011) sum up the case for using the Rosen-Roback approach to modeling regional growth as follows (on page 34): **“To us, these findings support the view that regional and urban change is best understood not as the application of time-invariant growth processes, but rather as a set of responses by people and firms to large-scale technological change.** The responses are quite amenable to formal modeling, but only to formal models that respect the changing nature of transportation and other technologies.” To look at how a county, such as Alachua, or the larger Gainesville region, might grow differently in the future than in the past, conceptually the economic approach is essential. The trend method can do no more than estimate the chance of being an outlier conditional on behaving like a typical county. Using the Rosen-Roback model allows us to tap into an enormous body of theoretical and empirical literature and provides a framework for thinking about how local decisions impact deviations from past trends.*

*We make two basic arguments. First, **Gainesville and UF need a new engine of economic growth if they are to become a dynamic city and university at the forefront of the knowledge economy, rather than stagnating.** Second, despite the fact that projections that extrapolate from past trends suggest slow growth in coming decades, growth well above those projections is very possible—though not certain—with appropriate state and local policies and investments. The combination of UF, the land assembled by Plum Creek, and mild winters means **Alachua is well positioned to grow faster and better—if collaboration between interested parties, sufficient investment in infrastructure, and appropriate state and local policies toward business and development are achieved.***

For additional information, please refer to the full report as provided in the application.

B. FLORIDA STATUTES 163 PART II COMPREHENSIVE PLAN AMENDMENT REQUIREMENTS

STAFF COMMENT B.a:

Impact of Amendment

Florida Statutes Section 163.3177, F.S. includes requirements for Comprehensive Plans and Plan amendments.

The proposed Envision Alachua Sector Plan mentions most of these issues and others listed in Chapter 163.3177, F.S., however, many of the policies defer providing details or analyzing these issues until the DSAP or some later date. The information provided is not sufficient to determine the impact of the amendment on public facilities, services, water supply, and natural resources.

COMMENT SUMMARY:

B.a. Provide information necessary to determine the impact of the amendment on public facilities, services, water supply, and natural resources.

RESPONSE

The response for this comment has been combined and provided in association with the response for Staff Comment A.1.a.

After further review of the proposed policy series in the context of preparing the responses to the staff comments, ADDITIONAL policies are also proposed that 1) reflect the existing protections within the Alachua County Comprehensive Plan relating to the impacts of development on natural resources and 2) address the mechanisms for meeting the infrastructure needs as determined by the assessment.

NATURAL RESOURCES ADDITIONAL POLICIES. To clarify the intent to protect Natural Resources through Conservation Covenants and Conservation Easements over time, and to provide a more clear articulation of the timing requirements for each, a revision has been proposed to Policy 10.2.5.1 and a rewrite/replace for Policy 10.2.5.2. To clarify the distinction between natural resource protection policies that related to general protection efforts and those that are specifically applicable as a part of the development review and approval process, a revision to Objective 10.3 and the policy series that is a part of Objective 10.3 is proposed. This proposed revision relies upon the policy construction from the adopted Alachua County Comprehensive Plan within the Conservation and Open Space Element, as Objective 3.6 and its policies as well as within the Transportation and Mobility Element, as Objective 1.5 and its policies.

PHYSICAL INFRASTRUCTURE AND DSAP REVISIONS AND ADDITIONAL POLICIES. To further address this issue, a mechanism for ensuring adequate infrastructure is provided.

RESPONSE (CONT.): STAFF COMMENT B.a.

Provide information necessary to determine the impact of the amendment on public facilities, services, water supply, and natural resources.

1. NATURAL RESOURCES REVISIONS AND ADDITIONAL POLICIES

Policy 10.2.5 Conservation (EA-CON)

Lands assigned the EA-CON land use category shall not be permitted residential uses, and no transfer of density shall be allowed from lands designated as EA-CON. Changes that modify the boundaries and configuration of these areas shall be permitted due to science-based refinement of such areas by survey, by habitat evaluation, by other recognized assessment methodology, or by an environmental assessment and may be approved as an administrative amendment to the DSAP by the Planning Director or his/her designee. These boundary and configuration changes shall not result in any net decrease in the total acreage designated as Conservation Land Use.

Within the EA-CON land use category, silviculture uses employing the latest applicable best management practices of the Florida Department of Agriculture and Consumer Services shall be permitted, and the following uses generally shall be permitted to the extent that they do not significantly alter the natural functions of the conservation area:

- a. Public and private conservation, recreation and open space uses.
- b. Public and private wildlife preserves, game management and refuge areas.
- c. Mitigation Areas.
- d. Water conservation and retention/detention areas that are determined to be appropriate for stormwater management.
- e. Agricultural ~~and Silvicultural~~ uses, employing latest applicable best management practices.
- f. Road crossings planned and designed using best management practices, including up to four crossings of Lochloosa Creek, to serve motorized vehicles, pedestrians, bicyclists, and utilities.

Policy 10.2.5.1 Conservation (EA-CON) Natural Resource Protection

Areas designated as Conservation Land Use (EA-CON) shall be permanently protected, and maintained as undeveloped conservation, silviculture or agriculture areas or for natural resource protection and passive recreational uses and shall be subject to a conservation management plan enforced through the conservation covenants or easements. **It is the intent that through these policies these areas be protected, which protection shall be enforced over time through a combination of conservation covenants and conservation easements, and that ultimately, at build out, all lands designated as EA-CON shall be protected by conservation easement.** The management plan shall establish management objectives, outline procedures, and define the roles and responsibilities for managing these areas. The plan shall also provide for the protection of species listed by FFWCC and USFWS.

Policy 10.2.5.2 Conservation (EA-CON) Timing of Conservation Covenants and Conservation Easements

The following timing requirements will apply to lands within EA-CON:

- a. Lands within EA-CON that have a conservation easement in place on the date of adoption of the EASP shall be included in the management plan adopted within 12 months following receipt of state and federal environmental permits required for the first DSAP. Silviculture uses shall continue to be allowed under the terms of the existing conservation easements unless additional restrictions are a condition of state or federal environmental permits.
- b. Lands within EA-CON that do not have a conservation easement in place on the date of the adoption of the EASP shall be addressed within the DSAP process as follows:
 1. The proportion of EA-CON Land Use required to be included within any specific DSAP shall be in direct proportion to the total development program included within the DSAP; the total land area for development that is included within the DSAP; or the land area required for mitigation by state or federal permits for development within the DSAP, whichever amount is greater.

RESPONSE (CONT.): STAFF COMMENT B.a.

Provide information necessary to determine the impact of the amendment on public facilities, services, water supply, and natural resources.

Policy 10.2.5.2 (cont)

2. For lands that are included in the mitigation requirements for the state and federal environmental permits for a specific DSAP, a conservation easement shall be provided and will be transferred to the County and to a qualified conservation organization acceptable to the County and experienced in holding and maintaining conservation easements, subject to their acceptance after review and approval of the easement as to form and content, or to one or more entities specified by required environmental permits within 12 months of the effective date of the required state and federal environmental permits for that DSAP.
3. For EA-CON lands within each specific DSAP that are not included in the mitigation requirements for state and federal environmental permits, they will be included within a conservation covenant that will be transferred to the County and to a qualified conservation organization acceptable to the County and experienced in holding and maintaining conservation easements, subject to their acceptance after review and approval of the covenant as to form and content within 12 months of the effective date of the required state and federal environmental permits for that DSAP.
4. Conservation covenants shall be converted to conservation easements in an amount proportionate to the percentage of the development program constructed within the DSAP. The timing of conversion will be consistent with the timing of the status report for the DSAP which shall be regularly reported to the State through the statutorily required Evaluation and Appraisal Report (EAR) prepared and submitted by the County.
- c. Conservation covenants shall be consistent with the conservation purposes set forth in Sec. 704.06(1), Florida Statutes, except that the term shall run with the land for an initial term of ten years, which shall automatically be renewed every ten years thereafter so long as the maximum densities and intensities established in the Objective 10.1.4 shall remain in effect provided that a voluntary reduction in such densities and intensities sought by the applicant, grantor or its successors shall not affect the continued existence of the covenant.
- d. Both the County and the qualified conservation organization designated to receive the conservation easement and/or conservation covenant shall agree prior to accepting the easement or covenant that the boundaries of the easement or covenant may be adjusted on an acre for acre basis upon request of the holder of the fee interest in the land if the environmental value of the easement or covenant is not diminished by the boundary adjustment.

RESPONSE (CONT.): STAFF COMMENT B.a.

Provide information necessary to determine the impact of the amendment on public facilities, services, water supply, and natural resources.

OBJECTIVE 10.3.1 – NATURAL RESOURCE PROTECTION (GENERAL)

Protect and manage significant, interconnected, large-scale conservation areas and natural resource protection corridors that serve to support and reinforce regional and state-wide wildlife corridor and habitat linkages, thus forming a vital natural resource link in the “emerald necklace” around Gainesville and Alachua County.

Policy 10.3.1.1 Conservation Covenant / Conservation Easement: Draft

Within 60 days of the effective date of the EASP plan amendment, the property owner shall draft, (1) a conservation covenant and (2) a conservation easement in a format consistent with the provisions of Section 704.06, Florida Statutes, to be used for areas designated EA-CON and RBOS, in accordance with the provisions of Objective 10. The covenant and easement shall provide that any grantee may act to enforce the terms of the covenant or easement. The Conservation covenant and easement shall incorporate provisions for a conservation management plan which shall include conservation objectives and outcomes and a financial plan for meeting the obligations of the program over time.

Policy 10.3.1.2 Protection of Important Natural Resource Area Edges

Development occurring along the edges of wetlands protected pursuant to state and federal environmental permits and other important natural resource areas identified during the DSAP process as entitled to protection shall be designed to protect and minimize the impact of development on these areas through the use of natural vegetative buffers.

- a. Buffer width shall be determined on a case-by-case basis depending on what is demonstrated to be scientifically necessary to protect the identified resource from significant adverse impact. This determination shall be made in consideration of at least the following factors:
 - i. Type of development and associated potential for adverse site-specific and off-site impacts;
 - ii. Identified resource type and associated hydrologic or management requirements;
 - iii. Buffer area characteristics and function;
 - iv. Presence of listed species of plants and animals.
- b. Absent scientific information which demonstrates that a larger or smaller buffer width is appropriate, the following buffer widths shall apply for the resources set forth in the table below.

<u>Protected Resource</u>	<u>Buffer Distance (feet)</u>
<u>Surface waters and wetlands greater than 0.5 acre that do not include OFWs or listed animal species as described elsewhere in this table</u>	<u>75 average, 50 minimum</u>
<u>Areas where federally and/or state regulated vertebrate wetland/aquatic dependent animal species have been documented within 300 feet of a surface water or wetland</u>	<u>100 average, 75 minimum</u>
<u>Outstanding Florida Waters (OFWs)</u>	<u>150 average, 100 minimum</u>

- c. Buffers shall be measured from the outer edge of the regulated wetland or water body.

RESPONSE (CONT.): STAFF COMMENT B.a.

Provide information necessary to determine the impact of the amendment on public facilities, services, water supply, and natural resources.

Policy 10.3.1.3 Protection of Strategic Ecosystems

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 46,051 acres of land within the EASP as EA-CON Land Use fulfills the requirements of Objective 4.10.

Policy 10.3.1.4 Protection of Sinkhole Basin

The EASP shall protect the sinkhole and the significant features of the sinkhole basin. The sinkhole basin shall be designated as RBOS. The sinkhole within the EA-EOMU north and west of Lochloosa Creek is recognized as a significant geological feature, and the sinkhole area protected in accordance with ACCP Objective 4.4 shall be designated RBOS.

OBJECTIVE 10.3.2 – NATURAL RESOURCE PROTECTION (DEVELOPMENT STANDARDS)

Protect natural resources by requiring that all development activities be conducted in accordance with at least minimum resource protection standards. (NOTE: this objective mirrors objective 3.6, ACCP, Conservation and Open Space Element)

Policy 10.3.2.15 Cultural Resource Assessment

A Phase I cultural resource assessment survey shall occur prior to initiating any project related land clearing or ground disturbing activities that are not agriculturally related within the project area. The purpose of this survey will be to locate and assess the significance of any historic properties present. The resultant survey report must conform to the specifications set forth in Chapter 1A-46, Florida Administrative Code, and be forwarded to the Division of Historical Resources for comment and recommendation in order to complete the process of reviewing the impact of the proposed project on historic resources. Should significant resources be present, additional archaeological testing may be necessary, and/or protection and preservation of significant sites may be required.

Policy 10.3.2.2 Minimal Standards of Conformance

All development shall conform with the environmental regulations of federal, state, and local agencies as well as the Water Management Districts. (NOTE: this policy mirrors policy 3.6.1, ACCP, Conservation and Open Space Element)

Policy 10.3.2.3 Intergovernmental Coordination for Resource Protection

The County shall coordinate with adjacent counties and WMDs to conserve, appropriately use, or protect unique natural resources located within more than one local jurisdiction. (NOTE: this policy mirrors policy 3.6.2, ACCP, Conservation and Open Space Element)

Policy 10.3.2.4 Ensure Adequate Protection from Adjacent Uses

Within EA-AG and EA-RUR, 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. Within EA-EOMU parcels that include or are adjacent to EA-CON or RBOS 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 (NOTE: this policy mirrors policy 3.6.3, ACCP, Conservation and Open Space Element for EA-AG and EA-RUR and is refined to reflect the conservation definitions for EA-EOMU)

Policy 10.3.2.5 Minimum Buildable Area Requirements

Within EA-AG and EA-RUR, 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. (NOTE: this policy mirrors policy 3.6.4, ACCP, Conservation and Open Space Element) for EA-AG and EA-RUR.

RESPONSE (CONT.): STAFF COMMENT B.a.

Provide information necessary to determine the impact of the amendment on public facilities, services, water supply, and natural resources.

Policy 10.3.2.6 Site Design Standards and Resource Protection – EA-AG and EA-RUR

Within the EA-AG and EA-RUR future land use categories, development on land that includes conservation areas shall be sited and designed according to the following standards and consistent with policies under Objective 6.2 of the Future Land Use Element in the rural area:

- (a) The preservation of conservation areas shall be required on all development sites to the greatest extent possible, consistent with standards which are outlined subsequently in this Element.
- (b) Density or intensity shall be transferred from conservation areas to non-conservation portions of the property, to adjoining property under common ownership or management and within a unified development, or to other development receivership areas, at a rate consistent with that of the underlying zoning district, but not to exceed the maximum density allowed by the land use designation.
- (c) When there are no non-conservation areas to which density or intensity may be transferred, the development shall be clustered in the portion of the site that will result in the least environmental impact.
- (d) When connection to central sewer is not required, septic wastes shall be disposed of according to the Comprehensive Plan, land development regulations, and health department standards, and without adversely affecting ecosystem health.
- (e) Existing landscape connections to other conservation areas shall be maintained so that fragmentation is avoided. (NOTE: this policy mirrors policy 3.6.5, ACCP, Conservation and Open Space Element)

Policy 10.3.2.7 Supplemental Site Design Standards and Resource Protection – EA- EOMU

Within the context of the EA Sector Planning Area the primary focus of resource protection is provided for regional scale conservation areas, corridors and linkages. A secondary focus is provided for on-site development of land that includes conservation areas. Within the EA-EOMU development shall be sited and designed according to the following standards:

- (a) Preservation shall be required of wetlands protected pursuant to state and federal environmental permits and other important natural resource areas identified during the DSAP process as entitled to protection on all development sites consistent with standards, which are outlined in this Element.
- (b) Existing landscape connections to other conservation areas shall be maintained so that fragmentation is avoided.

Policy 10.3.2.8 Best Management Practices

- a. Within EA-AG and EA-RUR, development on land that includes or is adjacent to conservation or preservation areas, wetlands protected pursuant to state and federal environmental permits and other important natural resource areas identified during the DSAP process shall exhibit best environmental management practices with the emphasis on designing with nature, e.g. in the context of the natural features of the landscape, such as topographic and stormwater features, vegetative edges, and soil types, to avoid and minimize adverse environmental and visual impacts. The major criterion for approval shall be the continued functioning, with minimum disturbance, of the ecosystem which the development is impacting.
- b. Within EA-EOMU, development on land that includes or is adjacent to EA-CON, RBOS, wetlands protected pursuant to state and federal environmental permits and other important natural resource areas identified during the DSAP process shall exhibit best environmental management practices with the emphasis on designing with nature, e.g. in the context of the natural features of the landscape, such as topographic and stormwater features, vegetative edges, and soil types, to avoid and minimize adverse environmental and visual impacts. The major criterion for approval shall be the continued functioning, with minimum disturbance, of the ecosystem which the development is impacting. (NOTE: this policy is similar to policy 3.6.6, ACCP, Conservation and Open Space Element)

Policy 10.3.2.9 Managing Invasive Vegetation

The County shall encourage the control or elimination where feasible, of invasive vegetation within the protected area. (NOTE: this policy mirrors policy 3.6.9, ACCP, Conservation and Open Space Element)

Policy 10.3.2.10 Adjacent Density

The intensity of development on land adjacent to EA-CON land use and RBOS shall be determined based on the unique characteristics of the conservation area. Land use shall be consistent with natural resource protection. (NOTE: this policy is similar to policy 3.6.10, ACCP, Conservation and Open Space Element)

RESPONSE (CONT.): STAFF COMMENT B.a.

Provide information necessary to determine the impact of the amendment on public facilities, services, water supply, and natural resources.

Policy 10.3.2.11 Septic Tanks and Drainfields

Within EA-AG and EA-RUR, septic tanks and drainfields shall be sited in a manner to protect conservation areas, adjacent EA-CON, and adjacent RBOS from the discharge of improperly treated effluent. The use of alternative systems shall be required under appropriate circumstances to protect environmental health. (NOTE: this policy is similar to policy 3.6.11, ACCP, Conservation and Open Space Element)

Policy 10.3.2.12 Limiting Impacts on Resources

- a. *Within EA-AG and EA-RUR, utilities and transportation facilities shall be located, designed, constructed, and maintained to avoid, minimize and/or mitigate adverse impacts to conservation and preservation areas consistent with these policies. In the case of utilities or transportation infrastructure for which there is no prudent and feasible alternative that avoids adverse impacts to conservation and preservation areas, the project shall incorporate appropriate design features that enhance habitat connectivity, provide for the safe passage of wildlife, and provide other significant environmental benefits. Mitigation shall be required as for private developments.*
- b. *Within EA-EOMU, utilities and transportation facilities shall be located, designed, constructed, and maintained to avoid, minimize and/or mitigate adverse impacts to natural resource areas that are protected consistent with these policies. In the case of utilities or transportation infrastructure for which there is no prudent and feasible alternative that avoids adverse impacts to conservation and preservation areas, the project shall incorporate appropriate design features that enhance habitat connectivity, provide for the safe passage of wildlife, and provide other significant environmental benefits. Mitigation shall be required as for private developments. (NOTE: this policy is similar to the combined policy 1.5.1, ACCP, Transportation Mobility Element and 3.6.13, ACCP, Conservation and Open Space Element)*

Policy 10.3.2.13 Mitigation of Impacts

Alachua County shall require mitigation of significant adverse impacts on conservation and preservation areas, where applicable, within the County. Mitigation shall include funding for the acquisition and management, preservation, replacement, or restoration of significant ecological resources. (NOTE: this policy mirrors policy 3.6.14, ACCP, Conservation and Open Space Element)

Policy 10.3.2.14 Infrastructure used to enhance Natural Resources

Appropriate conservation, arboricultural, and horticultural standards shall be used in the design, construction, and maintenance of transportation facilities in order to promote energy conservation, enhance habitat connectivity, provide for the safe passage of wildlife, and improve scenic quality, consistent with Objectives 5.3 and 5.4 of the Conservation and Open Space Element. (NOTE: this policy mirrors policy 1.5.2, ACCP, Transportation Mobility Element)

Policy 10.3.2.15 Adjacent Density

The County shall identify and protect green infrastructure through the development review process by protecting conservation resources and natural areas and allow and encourage proven environmentally-friendly development techniques, like low impact development that minimize impacts to natural resources and water quality and maintain existing hydrologic conditions. (NOTE: this policy mirrors policy 3.6.15, ACCP, Conservation and Open Space Element)

RESPONSE (CONT.): STAFF COMMENT B.a.

Provide information necessary to determine the impact of the amendment on public facilities, services, water supply, and natural resources.

2. PHYSICAL INFRASTRUCTURE AND DSAP POLICY REVISIONS AND ADDITIONAL POLICIES

Policy 10.5.3 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 Funding for capital and operating costs for the required infrastructure for the EASP shall be assured, in part, 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 of the RBOS.

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:

- a. *Each DSAP shall describe the relationship between the developed area within the DSAP and the protection of existing and planned communities outside of the EASP as well as the relationship between the mix of uses provided within the DSAP, including the relationship between residential uses and employment, support commercial uses, community facilities, recreation and open spaces.*
- b. *Natural Resources Review and mitigation strategy where applicable;*
- c. *Identification of any necessary roadway crossings and utilities that would occur on Conservation Lands; ~~and~~*
- d. *Identification of the location of the RBOS; and*
- e. *Each DSAP shall demonstrate the adequate funding of infrastructure as required by Policy 10.5. 3 for each phase of each development and shall identify the financial strategy to construct and maintain all required infrastructure.*

The proportion of EA-CON Land Use required to be included within any specific DSAP shall be in direct proportion to the total development program included within the DSAP; the total land area for development that is included within the DSAP; or the land area required for mitigation by state or federal permits for development within the DSAP, whichever amount is greater.

NEW POLICIES

Policy 10.6.9 Infrastructure Financing Minimum Requirements (NOTE: Renumber all following policies)

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.

Policy 10.6.9.1 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.

B. FLORIDA STATUTES 163 PART II COMPREHENSIVE PLAN AMENDMENT REQUIREMENTS

STAFF COMMENT B.b:

Required Maps

Please clarify the statement in proposed Policy 10.2.1: “The adopted future land use map categories include Rural (EA-RUR), Agriculture (EA-AG), Conservation (EA-CON) and Employment Oriented Mixed Use (EA-EOMU). This Map series in conjunction with the implementation of the DSAP process serves as the Future Land Use Map and Conservation and Open Space Element Map series for the EASP. No additional land use overlays, text defined overlays, or other similar mechanism that limits or restricts the use of land other than the policies of Objective 10 shall apply.” [emphasis added]. This leaves the 60,000 acres within the Envision Alachua Sector Plan without maps of several items required for comprehensive plans or plan amendments by 163.3177, F.S. Note that the DSAP process is not the process provided by statute for amendments of a comprehensive plan.

COMMENT SUMMARY:

B.b. Clarification of Policy 10.2.1 regarding required maps and map components.

RESPONSE

With regard to the Future Land Use Map Series, it was the intent of this policy to rely upon the Alachua County Comprehensive Plan map series to reflect the future land use mapping requirements for the lands within this plan amendment with the exception of the specific future land use designations that are proposed to be created and assigned as a part of this amendment application. However, it was also the intent of this policy to establish that the land use assignments, policy provisions and regulatory restrictions contained within the Sector Plan Objective 10 would supersede any standards, restrictions or other regulatory provisions of the Alachua County Comprehensive Plan that are associated with the geographic limits of those additional maps.

Due to the size and location of this plan amendment, the future land use designations and the proposed policies have been specifically designed to articulate and establish a regional approach to natural resource protection. Thus, with regard to this policy the intent was 1) to acknowledge and accept the extent that these resources are located within the Sector Plan boundary and 2) that these are the resources that are being addressed by the policies of Objective 10, which provide an alternate method of resource protection than that which is currently provided for by the Alachua County Plan.

In an effort to clarify this intent, a proposed revision of this policy has been prepared which seeks to follow the format of the statutory requirement as provided in Chapter 163.3177(6)(a)10, F.S. for ease of review.

Chapter 163.3177(6)(a)10, Florida Statutes

10. *The future land use element shall include a future land use map or map series.*
 - a. *The proposed distribution, extent, and location of the following uses shall be shown on the future land use map or map series:*
 - (I) *Residential.*
 - (II) *Commercial.*
 - (III) *Industrial.*
 - (IV) *Agricultural.*

RESPONSE (CONT.): STAFF COMMENT B.b.

B.b. Clarification of Policy 10.2.1 regarding required maps and map components.

RESPONSE

Chapter 163.3177(6)(a)10, Florida Statutes (Cont.)

- (V) Recreational.
- (VI) Conservation.
- (VII) Educational.
- (VIII) Public.
- b. *The following areas shall also be shown on the future land use map or map series, if applicable:*
 - (I) *Historic district boundaries and designated historically significant properties.*
 - (II) *Transportation concurrency management area boundaries or transportation concurrency exception area boundaries.*
 - (III) *Multimodal transportation district boundaries.*
 - (IV) *Mixed-use categories.*
- c. *The following natural resources or conditions shall be shown on the future land use map or map series, if applicable:*
 - (I) *Existing and planned public potable waterwells, cones of influence, and wellhead protection areas.*
 - (II) *Beaches and shores, including estuarine systems.*
 - (III) *Rivers, bays, lakes, floodplains, and harbors.*
 - (IV) *Wetlands.*
 - (V) *Minerals and soils.*
 - (VI) *Coastal high hazard areas.*

Policy 10.2.1 Establish Future Land Use Map

The Envision Alachua Sector Plan Framework Map and the East Area Inset Map is hereby adopted as a part of the Alachua County Future Land Use Map Series, Map F.17 and Map F.17-A and includes areas for urban development. The EASP functions as a large-scale alternative to the Urban Cluster and Activity Centers concepts of the Alachua County Comprehensive Plan policies for managing and directing urban development. The adopted future land use map categories include Rural (EA-RUR), Agriculture (EA-AG), Conservation (EA-CON) and Employment Oriented Mixed Use (EA-EOMU). This Map series in conjunction with the implementation of the DSAP process serves as the Future Land Use Map and Conservation and Open Space Element Map series for the EASP. **The future land use map series for the EASP includes:**

- a. The future land use designations as depicted on Map F.17 and Map F.17-A.;
 - b. The multimodal transportation district boundaries as depicted on Map 11.A (Transportation Element); and
 - c. All maps for natural resources and resource conditions that are included in the Alachua County Comprehensive Plan.
- The policies and provisions related to wetland protection, floodplain protection, and the Strategic Ecosystem protection are specifically contained within the policies of Objective 10. No additional land use overlays, text defined overlays or other similar mechanism that limits or restricts the use of land other than the policies of Objective 10 shall apply.

C. COMPREHENSIVE PLAN CONSISTENCY ANALYSIS

STAFF COMMENT C:

Future Land Use Element

Consistency

Policy 7.1.23 of the Future Land Use Element requires that all amendments shall be considered based on the applicable policies and objectives of this element, 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. The consistency analysis does not specifically address how the application is consistent with the first two General Strategies listed in the Future Land Use Element that implement the Guiding Principles in the adopted Alachua County Comprehensive Plan. These General Strategies contain provisions relating to minimizing the conversion of land from rural to urban uses by maximizing the efficient use of available urban infrastructure, while preserving environmentally sensitive areas and promoting 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. Please provide analysis of the consistency of the Envision Alachua proposed comprehensive plan amendment with the general strategies of the adopted Comprehensive Plan.

COMMENT SUMMARY:

C. Address the consistency of the proposed amendment with first two General Strategies listed in the Future Land Use Element.

RESPONSE

As pointed out by the County in its sufficiency letter, Policy 7.1.23 of the Future Land Use Element of the Alachua County Comprehensive Plan (ACCP) requires that:

“all amendments shall be considered based on the applicable policies and objectives of this Element, 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.”

By its express terms, Policy 7.1.23 does not require consistency with the “General Strategies” listed in the Future Land Use Element. As indicated in the Plan, the General Strategies include three methods the County will use to accomplish the Basic Principles. The ACCP does not state, and thus it should not require, that strict adherence to the three listed strategies are the only possible methods of achieving consistency with the Basic Principles. The amendment is consistent with the four Basic Principles upon which the ACCP is based, and Applicant has previously provided the required analysis of consistency of the proposed amendment with the four Basic Principles.

Further addressing the consistency issue in order to be responsive to staff’s comment, the amendment furthers, and therefore is consistent with, the primary objectives in General Strategy 1 in the following ways:

- The concentration of development in limited areas and the permanent protection of conservation areas will maximize the efficient use of urban infrastructure while preserving environmental sensitive areas;
- The FLUM amendment will set a definite boundary for urban growth within the Employment Oriented Mixed Use area;
- Higher average densities and mixed uses are required;
- A range of urban residential densities with the highest densities located in close proximity to jobs and lower densities located in areas adjacent to existing rural development patterns and conservation areas is required; and
- Conservation easements are required on extensive land areas to provide long-term protection of resources and regional conservation linkages.

RESPONSE (CONT.): STAFF COMMENT C.

C. Address the consistency of the proposed amendment with first two General Strategies listed in the Future Land Use Element.

RESPONSE

The scope and scale of the major economic opportunities that will result from the successful development of the EASP are not possible within the existing Urban Cluster. If the County chooses to limit its economic growth opportunities to areas within the existing Urban Cluster, the benefits of the amendment cannot be achieved.

General Strategy 2 was designed with a built environment in mind, and directs priorities for public facility improvements consistent with a “catch up” or “don’t get further behind” objective. The EASP is structured to avoid deficiencies in public facilities and services from the outset. To the extent that General Strategy 2 is applicable to the EASP, the amendment is consistent with General Strategy 2 in the following manner:

- Except to the extent that existing infrastructure may have available capacity or can be expanded to accommodate needs associated with development of the EASP, all infrastructure required for development of the EASP will be designed and constructed specifically to serve development within the EASP; and
- There will be no deficient public facilities or services within the EASP because development approvals for DSAPs are contingent upon providing all needed facilities and services.

D. PUBLIC SCHOOLS ANALYSIS

STAFF COMMENT D:

Current Available Data and Methodology

The public schools analysis in the Envision Alachua Sector Plan application incorrectly uses capacities in adjacent School Concurrency Service Areas (SCSAs) for this planning assessment. The analysis also did not use current school multipliers and capacity numbers available from the School Board. These updated numbers were provided by Gene Boles on behalf of the School Board of Alachua County in their preliminary review of the Envision Alachua Sector Plan/Comprehensive Plan Amendment application, in the form of the attached strike-through and underline of the analysis. Please incorporate these updated numbers in your analysis.

COMMENT SUMMARY:

D. Update public school capacity analysis to 1) assess capacity within established School Concurrency Service Areas and 2) use current school multipliers and capacity numbers available from the School Board.

RESPONSE

The requested updates have been prepared and are included in the revised Public Infrastructure Analysis report.

E. TRANSPORTATION

STAFF COMMENT E.1:

Study Area

The applicant did not submit a finalized Transportation Study Methodology prior to submitting the Sector Plan Application. The comments below are based on the contents of the draft methodology from 10/2/2013 and comments made by the County at the subsequent meeting with County, FDOT and City of Gainesville staff on 10/7/2013.

Study Area. The agreed upon study area for the transportation analysis was all regionally significant roadways where project trips exceeded 5% of the maximum service volume of the roadway based on FDOT generalized tables. This 5% test was to continue outside County lines when applicable. The traffic study does not include this analysis of impacts outside of County lines.

COMMENT SUMMARY:

E.1. Update analysis to apply 5% test to facilities outside the County jurisdiction where applicable.

RESPONSE

Based on the February 21, 2014 meeting with Alachua County staff, a revised Transportation Data and Analysis report has been prepared and includes the analysis of facilities outside Alachua County within the five-percent area of significance. Please refer to Section 6 of the revised transportation data & analysis report for this evaluation.

E. TRANSPORTATION

STAFF COMMENT E.2:

Model Network Modification

At the methodology meeting on 10/7/2013, there was significant discussion of the addition of a new modeled north-south roadway that travelled through the project area from SR 20 to SR 26. Staff was amenable to this roadway being added if it was truly possible to construct such a continuous facility within the project area. After reviewing the information in the application related to property ownership patterns, enclaves, proposed land use mix and the inclusion of a wildlife corridor that would have to be traversed by this roadway multiple times it does not appear likely that a roadway with the characteristics modelled in the analysis is likely, practical or desirable. Additionally, there are no policies in the proposed Comprehensive Plan Amendment that would require this facility to be constructed or guarantee that if it were to be constructed that it would be the sole responsibility of the developer.

Staff does agree that if the development program is constructed, that there would need to be a robust local roadway network to carry the traffic but the modelled roadway is not an appropriate analog to the likely future condition. The modelled roadway should be removed. Staff is open to additional discussions regarding the modelling of feasible connections between TAZs that are in addition to the 2035 model network.

COMMENT SUMMARY:

E.2. Modify north-south roadway within the cost feasible network base.

RESPONSE

Based on the February 21, 2014 meeting with Alachua County staff, a revised Transportation Data and Analysis report has been prepared which utilizes a modified representative on-site roadway network in the travel demand model. This modified network was reviewed with Alachua County staff via web conference on February 25, 2014.

E. TRANSPORTATION

STAFF COMMENT E.3:

LTMP Land Use Allocations

There are numerous proposed policies under proposed FLU Policy 10.1.4 that would allow additional development program over and above that modelled in the analysis. Additionally, conversions would be allowed between land uses which would result in a different outcome than that envisioned in the transportation analysis. The transportation analysis needs to be consistent with the maximum land uses allowed under the proposed policies or the policies should be revised to be consistent with the analysis.

COMMENT SUMMARY:

E.3. Transportation analysis should be made consistent with the maximum land uses allowed under the proposed policies.

RESPONSE

At the February 21, 2014 meeting with County staff, the table below was presented comparing trip generation for the maximum programs that could result from use of the conversion provisions in Policy 10.4.1. Based on this discussion, the revised Transportation Data and Analysis report was prepared using the same development program as in the original submittal because the order-of-magnitude difference in trip generation estimates is not significant.

Alternative Development Scenario Trip End Generation Evaluation Envision Alachua Sector Plan

Scenario	Development Program		Daily Gross Trip Ends Generated	Gross Trip End Difference	
	Res.	Non-Res.		#	%
EASP	10,500	15,500,000	271,501	0	0.00%
EASP w/ 110% Res	11,550	12,875,000	252,957	-18,544	-6.83%
EASP w/ 110% Non-Res	9,880	17,050,000	282,620	11,119	4.10%

Scenario	K factor*	D factor*	Gross PHPD Project Trips
EASP	0.09	0.55	0
EASP w/ 110% Res	0.09	0.55	-918
EASP w/ 110% Non-Res	0.09	0.55	550

Note:

*Generalized Value for Order-of-Magnitude Estimate of Peak-Hour Trips

E. TRANSPORTATION

STAFF COMMENT E.4.a:

Centroid Connection

The centroid connector for TAZ 581 to the west connecting to County Road 234 does not connect directly to CR 234. Instead, there is a short 2 lane roadway segment modeled for the connection. It is not clear why this model choice was made as the use of a roadway rather than directly connecting the centroid connector may impact the model's assignment of trips to County Road 234. Please provide additional justification for this model choice.

COMMENT SUMMARY:

E.4.a. Provide justification for model choice for connection to internal road rather than CR 234.

RESPONSE

During the February 21, 2014 meeting with Alachua County staff, it was determined to use a centroid connector to CR 234 rather than a new internal road connection within the model. This revision was made in the revised Transportation Data and Analysis report.

E. TRANSPORTATION

STAFF COMMENT E.4.b:

ATYPE = 52

All roadways in the project area continue to be modeled with ATYPE = 52. This indicates a rural facility. In the study, it is indicated that one of the mitigation measures may be to transition from rural to urban or suburban sections for SR 20. Certainly those roadways associated directly with the development will be designed as something other than rural. Provide a justification for using this ATYPE in the area.

COMMENT SUMMARY:

E.4.b. Provide justification for using rural facility type or provide modifications where applicable.

RESPONSE

Based on the February 21, 2014 meeting with County staff and subsequent web conference with Alachua County staff on February 25, 2014, the revised Transportation Data & Analysis report was prepared using urban area types and modified facility types for the representative on-site roadway network as well as SR 20 between CR 234 and Lochloosa Creek and CR 1474 east of Lochloosa Creek. Appendix E illustrates the model network utilized in the revised report.

E. TRANSPORTATION

STAFF COMMENT E.5:

Analysis

The transportation analysis was tasked in the draft methodology with providing the general identification of transportation facilities to serve the future land uses of the LTMP consistent with the State Statute on Sector Plans and County standards regarding updates to the Comprehensive Plan. Specifically the draft methodology stated, “the transportation analysis is proposed to consist of comparing the facility needs from the 2035 LRTP Cost Feasible Plan assignment with the facility needs of an assignment representing the full build-out of the LTMP.” The analysis provided is insufficient in this respect. Where the revised analysis shows deficiencies in level of service, remedies to these deficiencies by way of capital improvements or transit service should be identified in the analysis and reflected in proposed policies.

COMMENT SUMMARY:

E.5. Identify remedies to deficiencies identified by the analysis in the form of capital improvements and revise proposed policies accordingly.

RESPONSE

The revised Transportation Data and Analysis report includes a comparison of estimated future roadway volumes to the generalized service volumes. Based upon the February 21, 2014 meeting with Alachua County staff, it was determined that the revised report would also identify potential roadway capital improvements, in the form of added number of lanes, to inform policies addressing deficiencies.

F. NATURAL RESOURCES

STAFF COMMENT F.1:

Listed Specific Inventory

Data and analysis for “listed” species of wildlife did not include all species known to occur in Alachua County that are ranked S1, S2 or S3 by the Florida Natural Areas Inventory. Please apply the county’s definition of “listed species” in preparing the analysis.

COMMENT SUMMARY:

F.1.Revise analysis to apply the county’s definition of “listed species”

RESPONSE

The Florida Natural Areas Inventory (FNAI) Tracking Lists of vertebrates, invertebrates, and plants in Alachua County are included in Appendix B of the revised Environmental Data & Analysis Report dated March 2014. Those species with a state ranking of S1, S2, or S3 that were not already discussed or listed in Table 3.13-1 of the Environmental Data & Analysis Report dated December 2013 have been highlighted.

The majority of species ranked S1-S3 by FNAI have not met the requirements for protection under federal or state law. Species of wildlife and plants listed for federal protection under provisions of the Endangered Species Act (ESA) of 1973, 16 United States Code 1531-1544, December 28, 1973, as amended 1976 – 1982, 1984, and 1988 (ESA) and species listed for state protection under Florida rule (68A-27.0001- 27.007, Florida Administrative Code [F.A.C.]) known to occur within Alachua County, Florida, are the species described as “listed” within Section 3.14 of the revised Environmental Data & Analysis Report dated March 2014 as they have federal and state regulatory significance which will need to be addressed during future state and federal permitting efforts.

The Alachua County Comprehensive Plan and associated code indicates that “Listed plant and animal species include those species identified in 50 CFR 17.11 and 17.12, Endangered and Threatened Wildlife and Plants, F.A.C. 5B-40.0055, Regulated Plant Index, F.A.C. 68A-27, Rules Relating to Endangered or Threatened Species, and those identified as S1, S2, or S3 by the Florida Natural Areas Inventory.” Therefore, brief descriptions of the habitat requirements and likelihood of occurrence on the Plum Creek Property for those 104 species of plants and animals ranked S1-S3 by FNAI with the potential to occur in Alachua County, and not discussed in Section 3.14 or listed in Table 3.14-1 as a state or federally listed species, have been included in Section 3.15 of the revised Environmental Data & Analysis Report dated March 2014.

RESPONSE (CONT.): STAFF COMMENT F.1.

Revise analysis to apply the county’s definition of “listed species”

The Plum Creek Envision Alachua Sector Plan includes more than 46,000 acres of conservation, or 76% of the Plum Creek Property. The proposed conservation areas include a variety of upland habitat types including pasture, herbaceous upland nonforested, shrub and brushland, pine flatwoods, upland coniferous forest, and mixed hardwood forests for utilization by various listed species in addition to the diverse wetland habitat to be protected including bay swamps, gum swamps, mixed wetland hardwoods, wetland coniferous forest, cypress, hydric pine flatwoods, wetland forested mixed, freshwater marshes, wet prairies, and mixed shrub wetlands. Therefore the intent of Objective 4.9 of the Alachua County Comprehensive Plan (adopted April 5, 2011) has been met by protecting a variety of upland and wetland plant and wildlife habitats to maintain and enhance species diversity within Alachua County.

F. NATURAL RESOURCES

STAFF COMMENT F.2:

Critical Ecological Corridors Map

Please include analysis of the county's adopted Critical Ecological Corridors map (Conservation & Open Space Element, Map 5) in Environmental Data & Analysis Section 2.0.

COMMENT SUMMARY:

F.2. Include analysis of the Critical Ecological Corridors Map.

RESPONSE

A map of the Critical Ecological Corridors within the Plum Creek Property has been included as Figure 3.13-1 in the revised Environmental Data & Analysis Report dated March 2014. This map is referenced in Policy 6.3.2 of the Alachua County Comprehensive Plan (adopted April 5, 2011); however, it is not referenced on the Environmental Resources Assessment Checklist, nor is it specifically referred to within the Alachua County Unified Land Development Code (amended August 27, 2013). This suggests the map is not regulatory, but rather used in planning efforts by Alachua County staff.

In a document prepared for the Board of County Commissioners Adoption Hearing on April 5, 2011, Alachua County staff responded to FWC comments on the amendment to Policy 6.3.2 by stating “The Critical Ecological Corridors Map and Policy 6.3.2 are intended to highlight the need to conserve and maintain the connectivity of habitats within the eastern portion of the County that connects Ocala and Osceola populations of black bear and other threatened species...” Most of the Plum Creek Property east of US Highway 301 is within the Secondary Range of the Ocala/St. Johns subpopulation of black bears as mapped by FWC, and is proposed for conservation (see Figure 3.14.3.1-1 in revised Environmental Data & Analysis Report dated March 2014).

Through the extensive Envision Alachua planning process, the importance of maintaining both local and regional environmental and wildlife linkages was emphasized, resulting in the proposed environmental framework map. The proposed 2,600-acre Lochloosa Creek corridor conserves connectivity between public lands in the eastern portion of Alachua County, maintaining the depicted Critical Ecological Corridor. Additionally, the portion of the property north of State Road 20 within the mapped Critical Ecological Corridor is also proposed for conservation.

F. NATURAL RESOURCES

STAFF COMMENT F.3:

Water Quality

Please provide analysis on how the applicant plans to address water quality issues associated with the project, including but not limited to wastewater and stormwater management and the Orange Creek Basin and Santa Fe River Basin Management Action Plans.

SUMMARY:

F.3. Identify how the applicant will address water quality issues.

RESPONSE

The Plum Creek Envision Alachua Sector Plan does not propose any changes to the current Alachua County Comprehensive Plan (adopted April 5, 2011) policies related to water quality. All applicable federal, state, regional, and local standards will be met during future permitting processes, including those set forth in the Orange Creek Basin and Santa Fe River Basin Management Action Plans (BMAPs). Specific details will be provided at the DSAP level. Plum Creek has proposed an integrated water resource management plan to be realized over the next 50 years as discussed in the Water Supply Data and Analysis Report dated December 9, 2013, prepared by CH2M Hill.

Given the Plum Creek Property is located within the Santa Fe River and Orange Creek watersheds, both with impaired water bodies and adopted BMAPs, the proposed stormwater management system must be able to reduce pollutant loads to current conditions, at a minimum, as required by the St. Johns River Water Management (SJRWMD) and Alachua County. The required percent reductions in pollutant loads envisioned based on existing and future land uses, suggests traditional stormwater ponds will not suffice. Therefore, in order to accomplish this in addition to flow attenuation and floodplain management, a multifaceted / integrated stormwater management system will be implemented. The following three (3) elements will be implemented in order to achieve no increase in pollutant loads to Newnans Lake, Lochloosa Creek, and Lochloosa Lake:

- Low Impact Development (LID) Techniques
- Stormwater Management Ponds
- Stormwater Reuse

RESPONSE (CONT.): STAFF COMMENT F.3.

Identify how the applicant will address water quality issues.

Low Impact Development Techniques

In order to effectively capture the pollutants from the "first flush" effect, and achieve the percent reduction goals, it is imperative that the stormwater management system encompass LID techniques, where feasible and applicable. The following LIDs are envisioned:

- The use of low impact stormwater design consisting of vegetated swales, where appropriate, based on slopes greater than 2% and buffers prior to discharge of treated stormwater;
- The use of bioretention areas or rain gardens;
- The integral use of shade trees and open areas to reduce the impacts of paved areas;
- Permeable pavements; and
- Narrowing street widths to the minimum width required to support traffic, on-street parking where appropriate, and emergency vehicle access.

Stormwater Management Ponds

Given the existing topography, groundwater conditions, and adjacent wetland features, it is envisioned that centrally located, large, wet detention ponds will be implemented. These ponds will provide several benefits ranging from focal points for passive recreational purposes and aesthetics to water quality treatment and flood protection volume. However, wet detention ponds alone will not provide sufficient removal of total nitrogen and phosphorous to offset the increase in pollutant loads. It should be noted that special construction features will be evaluated to prevent the additional nutrient loads from the subsurface Hawthorne formation.

Stormwater Reuse

To ensure that the pollutant load criteria are achievable, the remaining element of the multifaceted / integrated stormwater management plan will be the stormwater reuse component. This will involve stormwater pump stations to distribute the stormwater runoff to varying land uses in need of irrigation such as open spaces, agriculture, and possibly the manmade wetland system envisioned for the treated wastewater. A detailed water budget at the DSAP level will be required to balance the required pollutant load reductions and provide sufficient base flow to the downstream natural systems.

F. NATURAL RESOURCES

STAFF COMMENT F.4:

Wetlands

Source for wetlands analysis is solely SJRWMD land use data set. Please include other readily available electronic wetlands data sets (i.e., National Hydrographic Data, Alachua County Soil Survey, National Wetlands Inventory).

COMMENT SUMMARY:

F.4. Include other available electronic data sets for wetlands (in addition to the SJRWMD) in this analysis.

RESPONSE

F.S. 163.3245(3)(a)(5) requires “a general identification of regionally significant natural resources within the planning area based on the best available data”. The wetland analysis included in the Environmental Data & Analysis Report dated December 2013 utilized 2004 Suwannee River Water Management District (SRWMD) land use/land cover data (northern ~15% of Property) and a modification of the 2004 SJRWMD land use/land cover dataset. The mapped vegetative communities were updated to reflect the existing on-site land use cover types and approximate wetland boundaries based on selective groundtruthing and aerial photo-interpretation for the approximately 17,000 acres east of Newnans Lake in December 2011. While other wetland datasets were evaluated as part of the environmental analysis, only the most accurate and best data available was included in the submitted report. However, maps of wetlands data from the U.S. Geological Survey (USGS) National Hydrography Dataset (NHD), U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI), and Natural Resources Conservation Service (NRCS) Alachua County Soil Survey have been included as Figure 3.7.1-1, 3.7.1-2, and 3.7.1-3, respectively, in the revised Environmental Data & Analysis Report dated March 2014.

The modified land use data included within the Environmental Data & Analysis Report indicated approximately 17,057 acres of wetlands and 1,148 acres of surface water (18,205 acres of wetlands and surface water total). By comparison, the USGS NHD map, last revised in 2003 for Alachua County, includes 14,161 acres of wetlands and 2,403 acres of surface water (16,564 acres of wetlands and surface water total). The USFWS NWI map, based on 1984 aerials, includes 13,999 acres of wetlands and 2,544 acres of surface water (16,543 acres of wetlands and surface water total). The NRCS Alachua County Soil Survey, based on 1974 aerials and 1982 field work, indicate 15,728 acres of soils rated as Hydric (100%) or Predominantly Hydric (66-99%) likely to occur within wetlands and 2,491 acres were mapped as surface water (18,219 acres of wetlands and surface water total). Please note the total acreage of wetlands and surface water in the Environmental Data & Analysis Report is very similar to the NRCS mapped wetland and surface water acreage.

RESPONSE (CONT.): STAFF COMMENT F.4.

Include other available electronic data sets for wetlands (in addition to the SJRWMD) in this analysis.

Since beginning the Envision Alachua Sector Plan process, an update to both the SRWMD and SJRWMD land use/land cover dataset were released. The 2009 SJRWMD land use/land cover dataset was published in November 2011 based on 2009 color infrared aerial photography. The 2010-2011 SRWMD land use and cover dataset was published December 2012 based on 2010 or 2011 true color photography. Therefore the land use/land cover for the portion of the Property beyond the 17,000 acres that was previously groundtruthed and aerial photo-interpreted has been updated with the most current available data from the Water Management Districts (Figure 3.6-1 in revised Environmental Data & Analysis Report dated March 2014). The result is approximately 16,631 acres of wetlands and 1,583 acres of surface water (18,214 acres of wetlands and surface water total). The primary vegetative community change occurred within a portion of Orange Lake on the Property between the 2004 and 2009 SJRWMD datasets.

G. IMPACTS ON THE COST OF HOUSING

STAFF COMMENT G:

Section 402.05 (a) 18 Requirements

Section 402.05 (a) 18 requires an evaluation of the impacts of proposed comprehensive plan amendments on the initial cost of housing, the long-term cost of home ownership and the fiscal impacts to the County and the County taxpayers. Please provide this evaluation.

COMMENT SUMMARY:

G. Provide evaluation of impacts as required by the Alachua County Land Development Code.

RESPONSE

The conservation strategies incorporated into the water supply strategies have the potential to increase the initial cost of housing by requiring centralized services for all development, the requirement of “Florida Friendly” landscaping, and potential other design standards that would be required as a part of the DSAP process to insure that the water budget is maintained. While these requirements may have an initial cost for housing, it is expected that over the long term such conservation uses will decrease the long-term cost of home ownership by reducing water consumption per unit. There is no fiscal impact on the County and the County taxpayers.

Policy 10.4.1 Water Supply Strategy

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

- a. The use of large water storage facilities for water harvesting and capture shall be encouraged;*
- b. State-of-the-art system components (e.g., water recycling) shall be incorporated where appropriate and feasible;*
- c. Residential lots shall not be irrigated with potable water except for a limited period during the initial establishment of landscaping;*
- d. The priority for the use of reclaimed water shall be given to environmental restoration projects, industrial users and agricultural users;*
- e. There shall be no individual wells for individual residences or businesses. All wells within the EOMU shall be regulated as part of the utility system;*
- f. The use of “Florida Friendly” plant species shall be required for landscaping within the EA-EOMU, with a preference for native species;*
- g. All Agriculture and Silviculture activities shall follow the most recent applicable best management practices.*

Policy 10.4.2 Conservation – first Strategies for Water Supply

The EASP shall use conservation-first strategies within the EA-EOMU for water supply that include, but are not limited to, living within a water budget that recognizes supply limitations and reflects the value of the resource; minimizing water demand embedded within community design features such as buildings, hardscapes and landscapes; using Florida Friendly Landscaping principles to retain and/or establish landscapes that require no supplemental irrigation or nutrients (fertilization) beyond that provided by natural rainfall and possible minimal alternative water supply including reuse.

H. UNDEFINED TERMS

STAFF COMMENT H.1:

Indirect Conflict

Please clarify what is contemplated by the term “indirect conflict” as used in proposed Policy 10.1.2 and please provide a list of those current policies that would not apply in the Planning Area.

COMMENT SUMMARY:

H.1. Define Indirect Conflict;

H.1.a. Identify current policies of the Plan that would not apply with the Planning Area.

RESPONSE

An indirect conflict does not appear in the actual words of a goal, objective or policy but would, if applied, prevent, limit, or otherwise restrict another policy from being applied. Both a direct and an indirect conflict between two policies results in an inability to give meaning to both policies.

An example of a direct conflict is a requirement for a 50 foot buffer from a protected resource in one policy, but a 75 foot buffer from the same resource in another. Examples of an indirect conflict include: a policy that encourages walkable developments, contrasted with a policy that requires low-density, single use developments; a policy that requires parking behind buildings, contrasted with Crime Prevention Through Environmental Design policies; or a policy that requires strict adherence to concurrency LOS standards in all parts of a jurisdiction contrasted with policies encouraging urban infill.

RESPONSE: H.1.a

The Applicant has previously provided an extensive consistency analysis between provisions in the ACCP and the EASP amendment. In an effort to be responsive to this question, the Applicant provides a list of current ACCP policies that would not apply in the Planning Area beginning on page 54. A description of the application of policy by element is provided below, which notes that in most cases, policies do not apply to the amendment simply because they are not relevant to the EASP. Except where indicated below, provisions of the ACCP will apply to the EASP Planning Area.

Future Land Use Element: The land use designations within the EASP are unique to it and have been created with individualized authorized uses and development and design standards, and therefore most of the objectives and policies relating to generalized land use categories in the Future Land Use Element are not relevant to the Planning Area because the EASP will have its own land use categories. With the limited exceptions noted below, the Sector Plan amendment introduces alternative policy (ies) as a new standard for Planning at the Regional Landscape Scale and supersedes the following provisions of this element:

RESPONSE (CONT.): STAFF COMMENT H.1.a.

H.1.a. Identify current policies of the Plan that would not apply with the Planning Area.

Future Land Use Element (continued):

Land Use Categories that are not relevant to the EASP:

1.0 Urban Residential Policies

- Objectives 1.4 (Neighborhood Design and Site Standards) and 1.5 (Required Facilities) are general standards and will apply

2.0 Urban Activity Center Policies

3.0 Commercial Policies

- Objective 3.10 (Tourist/Entertainment Commercial Policies) and 3.11 (Rural Commercial Uses and Standards) are general standards and will apply

4.0 Industrial Policies

5.0 Institutional Policies

- Objective 5.1 (General), 5.2 (Location and Compatibility), 5.5 (Public Utility, Communication, or Infrastructure Services), 5.6 (Religious facilities) and 5.8 (Personal wireless service facilities) are general standards and will apply

6.0 Rural and Agricultural Policies

- Objective 6.1 (General) and Objective 6.4 (Rural clusters) will apply; Objective 6.2 will generally apply, but certain aspects have been superseded by the EASP amendments; Objective 6.3 (Rural Employment Centers) is not relevant to the EASP.

8.0 Special Area Studies

In addition, the following provisions in FLUE Section 7.0 Implementation, are not applicable to the Planning Area:

- Policy 7.1.3 is not applicable to the amendment, as it relates to expansions to the Urban Cluster, which is not relevant to approval of the amendment.
- Policy 7.1.6 is not applicable to the amendment to the extent that it requires that only lands within the Urban Cluster may have urban residential densities.
- Policy 7.1.23 is not applicable if it is interpreted to mean that alternate plan policies consistent with the goals of the ACCP may not be duly considered and adopted by the BOCC for a delineated subarea of the County.
- Policy 7.1.28 is not applicable if it is interpreted to require a separate Community and Neighborhood Planning program for implementation of the EASP.

FLUE Section 9.0 Transfer of Development Rights is not applicable because it allows for transfers only into areas within the existing Urban Cluster or municipalities. The Applicant will offer an amendment to eliminate this provision from the EASP.

Transportation Mobility Element: The Applicant has provided an alternative set of Objectives, Policies and standards, as well as proposed amendments to the Transportation Mobility Element (TME) creating a separate Transportation Mobility District, because the current plan is based primarily on achievement of mobility goals within the existing Urban Cluster. Within the current adopted TME, most of the provisions would not apply for this reason, as noted below:

Objective 1.1 (Urban Cluster Transportation Mobility Districts)

Objective 1.2 (Transportation Management Outside Urban Cluster Mobility Areas) Note: Applicable if amended

Objective 1.3 (untitled) Generally applicable, but development review standards for Detailed Area Specific Plans supersede process requirements

Objective 1.4 (untitled) With the amendment requested by the Applicant to include sector plans as an area designated for urban development, the EASP amendment is consistent with this Objective

Objective 1.5 (untitled) The Applicant will offer an amendment to the EASP to address these issues. (please see proposed policy additions, Policy 10.3.2.12 and Policy 10.3.2.14 on page 29 of this response.)

RESPONSE (CONT.): STAFF COMMENT H.1.a. H.1.a. Identify current policies of the Plan that would not apply with the Planning Area.

Housing Element: The EASP amendment does not propose policy or map amendments that supersede any of the adopted policies of the Housing Element.

Potable Water and Sanitary Sewer Element: The EASP amendment proposes text amendments that supersede the provisions of three of the adopted policies of the Potable Water and Sanitary Sewer Element:

Policy 2.1.4 - Although “community water systems” is undefined, central water is required in the EASP Planning Area.

Policy 3.1.5 and related Policy 3.1.6 – The provision of central water and sewer is required in the EA-EOMU and is not an “extension” as contemplated by Policy 3.1.5; the conditions listed in Policy 3.1.6 are not applicable to creation of the EA-EOMU land use category.

Solid Waste Element: The EASP amendment does not propose policy or map amendments that supersede any of the adopted policies of the Solid Waste Element.

Stormwater Management Element: The EASP amendment proposes text amendments that supersede the provisions of one of the adopted policies of the Stormwater Element: a portion of Policy 3.1.1 relating to levels of service. Consistent with current County practice, the amendment permits development within the 100-year floodplain to the extent that it does not result in adverse impacts as measured by an increase in peak stage or discharge outside the EASP boundary. Compensating storage is allowed 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 EASP boundaries. Development within the EASP Planning Area will be consistent with and governed by the portions of Policy 3.1.1 relating to Water Quality.

Conservation and Open Space Element: Specifically, the EASP provides alternate policies for the protection of conservation areas within the EA-EOMU Land Use because the existing policies do not anticipate development parcels on the scale of the EASP that can offer solutions that protect and enhance large natural systems of wetlands and uplands, rather than just protecting each wetland. Because the Urban Cluster has no large parcels that encompass landscape scale wetland ecosystems, the existing policies reflect protection of each wetland regardless of size. The amendment provides specific natural resource protection and development standards as part of the proposed map amendment and text amendment that considers the broader regional landscape setting within which the lands occur, and also protects key environmental linkages in the regional landscape. In addition, the EASP amendment designates conservation lands at the outset of the process, instead of at the “back end” of the development approval process as called for in the ACCP, and complies with the strategic ecosystem policies by designating 75% of the total land area of the EASP as EA-CON. Accordingly, the amendment provides alternative approaches to meeting the conservation goals established by Alachua County, and supersedes the following policies:

Objective 3.1 (Conservation Land Use Category)

Objective 3.2 (Preservation Land Use Category)

Objective 3.4 (Development Review Process) Note: Inventory and notification requirements are applicable, but the process will be addressed as part of DSAP reviews.

Objective 3.6 (Resource Protection Standards) The Applicant will offer an amendment to the EASP to address these issues.

Objective 4.7 (Wetland Ecosystems) These policies apply to lands with EA-AG, EA-CON and EA-RUR land uses.

Objective 4.8 (Flood Plains and Floodways) See explanation of proposed EASP amendment in Stormwater Management Element, above.

Objective 4.10 (Strategic Ecosystems)

RESPONSE (CONT.): STAFF COMMENT H.1.a.

H.1.a. Identify current policies of the Plan that would not apply with the Planning Area.

Recreation Element: The EASP amendment does not propose policy or map amendments that supersede any of the adopted policies of the Recreation Element.

Intergovernmental Coordination Element: The EASP amendment does not propose policy or map amendments that supersede any of the adopted policies of the Intergovernmental Coordination Element.

Capital Improvements Element: The EASP amendment proposes text amendments that supersede the provisions of one of the adopted policies of the Capital Improvements Element: Policy 1.9.3. This policy contains a cross-reference to Objective 3.6 of the Conservation and Open Space Element. The applicant has provided an amendment to the EASP that will supersede Objective 3.6 with policies specifically applicable to the Planning Area.

Economic Element: The EASP amendment does not propose policy or map amendments that supersede any of the adopted policies of the Economic Element.

Historic Preservation Element: The EASP amendment does not propose policy or map amendments that supersede any of the adopted policies of the Historic Preservation Element.

Public Schools Element: The EASP amendment does not propose policy or map amendments that supersede any of the adopted policies of the Public Schools Element.

Community Health Element: The EASP amendment does not propose policy or map amendments that supersede any of the adopted policies of the Community Health Element.

Energy Element: The EASP amendment does not propose policy or map amendments that supersede any of the adopted policies of the Energy Element.

FUTURE LAND USE ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable	Not Relevant & Not Applicable		
1.1		Urban Residential Policies - General			
	1.1.1		✓		
	1.1.2		✓		
	1.1.3				✓
	1.1.4		✓		
	1.1.5		✓		✓
	1.1.6	✓			
1.2		Location, Mix of Uses, and Implementation Consistent with Market Demand			
	1.2.1				✓
	1.2.1.1				✓
	1.2.1.2				✓
	1.2.2				✓
	1.2.3				✓
	1.2.4				✓
1.3		Density			
	1.3.1	✓			
	1.3.2	✓			
	1.3.2.1		✓		✓
	1.3.2.2		✓		
	1.3.3				✓
	1.3.4		✓		
	1.3.5		✓		
	1.3.6			✓	
	1.3.6.1			✓	
	1.3.6.2			✓	
	1.3.7		✓		
	1.3.7.1		✓		
	1.3.7.2		✓		
	1.3.7.3		✓		
	1.3.8		✓		
	1.3.8.1		✓		
	1.3.8.2		✓		
	1.3.8.3		✓		
	1.3.8.4		✓		
	1.3.9		✓		
	1.3.9.1		✓		
	1.3.9.2		✓		

FUTURE LAND USE ELEMENT

			ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
			Relevant & Applicable	Not Relevant & Not Applicable		
		1.3.10		✓		
		1.3.10.1		✓		
		1.3.10.2		✓		
		1.3.10.3		✓		
		1.3.10.4		✓		
1.4	Neighborhood Design and Stie Standards					
		1.4.1	✓			
		1.4.1.1	✓			
		1.4.1.2	✓			
		1.4.1.3	✓			
		1.4.1.4	✓			
		1.4.2	✓			
1.5	Required Facilities					
		1.5.1	✓			
		1.5.2	✓			
		1.5.3	✓			
1.6	Traditional Neighborhood Development					
		1.6.1		✓		
		1.6.2		✓		
		1.6.3		✓		
		1.6.4		✓		
		1.6.4.1		✓		
		1.6.4.2		✓		
		1.6.4.3		✓		
		1.6.4.4		✓		
		1.6.4.5		✓		
		1.6.4.6		✓		
		1.6.4.7		✓		
		1.6.5		✓		
		1.6.5.1		✓		
		1.6.5.2		✓		
		1.6.5.3		✓		
		1.6.5.4		✓		
		1.6.5.5		✓		
		1.6.5.6		✓		
		1.6.5.7		✓		
		1.6.5.8		✓		

FUTURE LAND USE ELEMENT

			ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
			Relevant & Applicable	Not Relevant & Not Applicable		
		1.6.5.9		✓		
		1.6.5.10		✓		
		1.6.5.11		✓		
		1.6.5.12		✓		
		1.6.5.13		✓		
		1.6.5.14		✓		
		1.6.6		✓		
		1.6.6.1		✓		
		1.6.6.2		✓		
		1.6.6.3		✓		
		1.6.6.4		✓		
		1.6.6.5		✓		
		1.6.6.6		✓		
		1.6.6.7		✓		
		1.6.6.8		✓		
		1.6.6.9		✓		
		1.6.7		✓		
		1.6.7.1		✓		
		1.6.7.2		✓		
		1.6.7.3		✓		
		1.6.7.4		✓		
		1.6.7.5		✓		
		1.6.7.6		✓		
		1.6.7.7		✓		
		1.6.7.8		✓		
		1.6.7.9		✓		
		1.6.7.10		✓		
		1.6.7.11		✓		
		1.6.7.12		✓		
		1.6.7.13		✓		
		1.6.8		✓		
	1.7	Transit Oriented Development				
		1.7.1		✓		
		1.7.2		✓		
		1.7.3		✓		
		1.7.4		✓		
		1.7.5		✓		

FUTURE LAND USE ELEMENT

			ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
			Relevant & Applicable	Not Relevant & Not Applicable		
		1.7.5.1		✓		
		1.7.5.2		✓		
		1.7.5.3		✓		
		1.7.5.4		✓		
		1.7.5.5		✓		
		1.7.6		✓		
		1.7.7		✓		
		1.7.8		✓		
		1.7.8.1		✓		
		1.7.8.2		✓		
		1.7.9		✓		
		1.7.10		✓		
2.1	Urban Activity Center Policies - General					
		2.1.1		✓		
		2.1.2		✓		
		2.1.3		✓		
		2.1.4		✓		
		2.1.5		✓		
		2.1.6		✓		
		2.1.7		✓		
		2.1.8		✓		
		2.1.9		✓		
		2.1.10		✓		
		2.1.11		✓		
		2.1.12		✓		
2.2	Activity Center Plans					
		2.2.1		✓		
		2.2.2		✓		
		2.2.3		✓		
		2.2.4		✓		
		2.2.5		✓		
		2.2.6		✓		
		2.2.7		✓		
		2.2.8		✓		
		2.2.9		✓		
		2.2.10		✓		
3.1	Commercial Policies - General					

FUTURE LAND USE ELEMENT

			ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
			Relevant & Applicable	Not Relevant & Not Applicable		
		3.1.1	✓			
		3.1.2		✓		
		3.1.3	✓			
		3.1.4	✓			
		3.1.5	✓			
		3.1.6		✓		
		3.1.7	✓			✓
3.2	Location and Compatibility					
		3.2.1				✓
		3.2.2				✓
		3.2.3				✓
		3.2.4				✓
3.3	Required Facilities and Services					
		3.3.1				✓
		3.3.2				✓
3.4	Roadway Commercial Policies and Standards					
		3.4.1				✓
		3.4.2				✓
		3.4.3				✓
		3.4.4				✓
3.5	Regional Shopping Center Policies and Standards					
		3.5.1				✓
3.6	Community Shopping Center Policies and Standards					
		3.6.1				✓
3.7	Neighborhood Shopping Center Policies and Standards					
		3.7.1				✓
3.8	Neighborhood Convenience Commercial Policies and Standards					
		3.8.1				✓
3.9	Office Policies and Standards					
		3.9.1		✓		
3.10	Tourist/Entertainment Commercial Policies					
		3.10.1	✓			
		3.10.2	✓			
3.11	Rural Commercial Uses and Standards					
		3.11.1	✓			
		3.11.2	✓			
4.1	Industrial Policies - General					

FUTURE LAND USE ELEMENT

			ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
			Relevant & Applicable	Not Relevant & Not Applicable		
		4.1.1				✓
		4.1.2				✓
		4.1.3				✓
		4.1.4				✓
4.2	Location and Compatibility					
		4.2.1				✓
		4.2.2				✓
		4.2.3				✓
		4.2.4				✓
4.3	Light Industrial					
		4.3.1				✓
4.4	Heavy Industrial					
		4.4.1		✓		
		4.4.2		✓		
4.5	Design and Site Standards					
		4.5.1				✓
		4.5.2				✓
		4.5.3				✓
4.6	Required Facilities and Services					
		4.6.1	✓			
		4.6.2	✓			
5.1	Institutional Policies - General					
		5.1.1	✓			
		5.1.2	✓			
5.2	Location and Compatibility					
		5.2.1	✓			
		5.2.2	✓			
5.3	Educational Facilities					
		5.3.1				✓
		5.3.2				✓
		5.3.3				✓
		5.3.4				✓
		5.3.5				✓
		5.3.6				✓
		5.3.7				✓
		5.3.8				✓
		5.3.9				✓

FUTURE LAND USE ELEMENT

			ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
			Relevant & Applicable	Not Relevant & Not Applicable		
		5.3.10				✓
5.4	Community Services					
		5.4.1				✓
		5.4.1.1				✓
		5.4.1.2				✓
		5.4.2				✓
		5.4.2.1				✓
		5.4.3				✓
		5.4.3.1				✓
		5.4.4				✓
		5.4.4.1				✓
		5.4.5				✓
		5.4.5.1				✓
		5.4.5.2				✓
		5.4.5.3				✓
		5.4.5.4				✓
		5.4.6				✓
		5.4.7				✓
5.5	Public Utility, Communication, or Infrastructure Services					
		5.5.1	✓			
		5.5.2	✓			
		5.5.3	✓			
		5.5.4	✓			
5.6	Religious Facilities					
		5.6.1	✓			
5.7	Cemetaries					
		5.7.1				✓
5.8	Personal Wireless Service Facilities					
		5.8.1	✓			
6.1	Rural and Agricultural Policies - General					
		6.1.1	✓			
		6.1.2	✓			
		6.1.3	✓			
		6.1.4	✓			
		6.1.5	✓			
		6.1.5.1	✓			
		6.1.5.2	✓			

FUTURE LAND USE ELEMENT

			ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
			Relevant & Applicable	Not Relevant & Not Applicable		
		6.1.5.3	✓			
		6.1.5.4	✓			
		6.1.6	✓			
		6.1.7	✓			
		6.1.8	✓			
6.2	Rural/Agriculture					
		6.2.1	✓			
		6.2.1.1	✓			
		6.2.2	✓			
		6.2.3	✓			
		6.2.4	✓			
		6.2.5	✓			
		6.2.5.1	✓			
		6.2.6	✓			
		6.2.6.1	✓			
		6.2.7	✓			
		6.2.8	✓			
		6.2.9	✓			
		6.2.10	✓			
		6.2.11	✓			
		6.2.12	✓			
		6.2.13	✓			
		6.2.14	✓			
6.3	Rural Employment Centers					
		6.3.1		✓		
		6.3.2		✓		
		6.3.3		✓		
		6.3.4		✓		
		6.3.5		✓		
		6.3.5.1		✓		
6.4	Rural Clusters					
		6.4.1	✓			
		6.4.2	✓			
		6.4.3	✓			
		6.4.4	✓			
		6.4.5	✓			
		6.4.6	✓			

FUTURE LAND USE ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable	Not Relevant & Not Applicable		
7.1 Implementation - General					
	7.1.1	✓			
	7.1.2	✓			
	7.1.3		✓		
	7.1.4	✓			
	7.1.5	✓			
	7.1.6		✓		
	7.1.7	✓			
	7.1.8	✓			
	7.1.9	✓			
	7.1.10	✓			
	7.1.11	✓			
	7.1.12	✓			
	7.1.13	✓			
	7.1.14	✓			
	7.1.15	✓			
	7.1.16	✓			
	7.1.17	✓			
	7.1.18	✓			
	7.1.19	✓			
	7.1.20	✓			
	7.1.21	✓			
	7.1.22	✓			
	7.1.23		✓		
	7.1.24	✓			
	7.1.25	✓			
	7.1.26	✓			
	7.1.27	✓			
	7.1.28		✓		
	7.1.29	✓			
	7.1.30	✓			
8.1 Special Area Study - North Main Street					
	8.1.1		✓		
	8.1.1.1.		✓		
	8.1.2		✓		
	8.1.2.1		✓		
	8.1.2.2		✓		

FUTURE LAND USE ELEMENT

			ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
			Relevant & Applicable	Not Relevant & Not Applicable		
		8.1.2.3		✓		
		8.1.2.4		✓		
		8.1.2.5		✓		
8.2	Special Area Study - Cross Creek Village					
		8.2.1		✓		
		8.2.2		✓		
		8.2.3		✓		
		8.2.3.1		✓		
		8.2.3.2		✓		
		8.2.4		✓		
		8.2.4.1		✓		
		8.2.4.2		✓		
		8.2.4.3		✓		
		8.2.4.4		✓		
		8.2.4.5		✓		
		8.2.4.6		✓		
		8.2.4.7		✓		
		8.2.4.8		✓		
8.3	Special Area Study - Waldo/301					
		8.3.1		✓		
		8.3.2		✓		
		8.3.2.1		✓		
		8.3.2.2		✓		
		8.3.2.3		✓		
		8.3.3		✓		
		8.3.3.1		✓		
		8.3.3.2		✓		
		8.3.4		✓		
		8.3.4.1		✓		
		8.3.5		✓		
8.4	Special Area Study - Idylwild/Serenola					
		8.4.1		✓		
		8.4.2		✓		
		8.4.2.1		✓		
		8.4.2.2		✓		
		8.4.2.3		✓		
		8.4.2.4		✓		

FUTURE LAND USE ELEMENT

			ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
			Relevant & Applicable	Not Relevant & Not Applicable		
		8.4.2.5		✓		
		8.4.2.6		✓		
		8.4.2.7		✓		
		8.4.3		✓		
		8.4.3.1		✓		
		8.4.3.2		✓		
		8.4.4		✓		
		8.4.4.1		✓		
		8.4.4.2		✓		
		8.4.4.3		✓		
		8.4.4.4		✓		
8.5 Special Area Study - Plan East Gainesville						
		8.5.1		✓		
		8.5.2		✓		
		8.5.3		✓		
		8.5.4		✓		
		8.5.5		✓		
		8.5.6		✓		
		8.5.7		✓		
		8.5.8		✓		
		8.5.9		✓		
		8.5.10		✓		
8.6 Special Area Study - Urban Service Area						
		8.6.1		✓		
		8.6.2		✓		
		8.6.3		✓		
		8.6.4		✓		
		8.6.5		✓		
		8.6.6		✓		
9.1 Transfer of Development Rights						
		9.1.1		✓		
		9.1.2		✓		
		9.1.3		✓		
		9.1.4		✓		
TOTALS		358	94	200	3	64

TRANSPORTATION MOBILITY ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable	Not Relevant & Not Applicable		
1.1 Urban Cluster Transportation Mobility Districts					
	1.1.1		✓		
	1.1.2		✓		
	1.1.3		✓		
	1.1.4		✓		
	1.1.5		✓		
	1.1.6		✓		
	1.1.6.1		✓		
	1.1.6.2		✓		
	1.1.6.3		✓		
	1.1.6.4		✓		
	1.1.6.5		✓		
	1.1.6.6		✓		
	1.1.6.7		✓		
	1.1.6.8		✓		
	1.1.6.9		✓		
	1.1.6.10		✓		
	1.1.6.11		✓		
	1.1.6.12		✓		
	1.1.6.13		✓		
	1.1.6.14		✓		
	1.1.6.15		✓		
	1.1.6.16		✓		
	1.1.7		✓		
	1.1.8		✓		
	1.1.9		✓		
	1.1.9.1		✓		
	1.1.9.2		✓		
	1.1.9.3		✓		
	1.1.9.4		✓		
	1.1.9.5		✓		
	1.1.10		✓		
	1.1.10.1		✓		
	1.1.10.2		✓		
	1.1.10.3		✓		
	1.1.10.4		✓		
1.2 Transportation Management Outside of Urban Cluster Mobility Areas					

TRANSPORTATION MOBILITY ELEMENT

			ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
			Relevant & Applicable	Not Relevant & Not Applicable		
		1.2.1				✓
		1.2.2				✓
		1.2.3				✓
		1.2.4				✓
		1.2.4.1				✓
		1.2.4.2				✓
		1.2.4.3				✓
		1.2.4.4				✓
		1.2.4.5				✓
		1.2.4.6				✓
		1.2.4.7				✓
		1.2.5				✓
		1.2.6				✓
1.3						
		1.3.1	✓			
		1.3.2	✓			
		1.3.3		✓		
		1.3.4	✓			
		1.3.5		✓		
		1.3.6		✓		
		1.3.7	✓			
		1.3.8	✓			
1.4						
		1.4.1				✓
		1.4.1.1	✓			
		1.4.1.2	✓			
		1.4.1.3	✓			
		1.4.1.4	✓			
1.5						
		1.5.1			✓	
		1.5.2			✓	
1.6						
		1.6.1	✓			
		1.6.2	✓			
		1.6.3	✓			
		1.6.4	✓			
		1.6.5	✓			

TRANSPORTATION MOBILITY ELEMENT

			ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
			Relevant & Applicable	Not Relevant & Not Applicable		
		1.6.6	✓			
		1.6.7	✓			
		1.6.8	✓			
		1.6.9	✓			
		1.6.10	✓			
		1.6.11	✓			
		1.6.12	✓			
1.7						
		1.7.1	✓			
		1.7.2	✓			
		1.7.3	✓			
		1.7.4	✓			
		1.7.5	✓			
		1.7.6	✓			
		1.7.7	✓			
1.8						
		1.8.1	✓			
		1.8.2	✓			
1.9						
		1.9.1	✓			
		1.9.2	✓			
		1.9.3	✓			
1.1	TRANSIT					
		1.1.1	✓			
		1.1.2	✓			
		1.1.3	✓			
		1.1.4	✓			
1.2						
		1.2.1		✓		
		1.2.2		✓		
1.3						
		1.3.1		✓		
		1.3.2		✓		
2.1	AVIATION					
		2.1.1		✓		
		2.1.2		✓		
		2.1.3		✓		

TRANSPORTATION MOBILITY ELEMENT

			ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
			Relevant & Applicable	Not Relevant & Not Applicable		
		2.1.4		✓		
2.2						
		2.2.1		✓		
		2.2.2		✓		
2.3						
		2.3.1		✓		
		2.3.2		✓		
		2.3.3		✓		
		2.3.4		✓		
TOTALS		105	37	52	2	14

HOUSING ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable(1)	Not Relevant & Not Applicable		
1.1					
	1.1.1	✓			
	1.1.2	✓			
	1.1.3	✓			
	1.1.4	✓			
	1.1.5	✓			
	1.1.6	✓			
	1.1.7	✓			
	1.1.8	✓			
	1.1.9	✓			
	1.1.10	✓			
	1.1.11	✓			
	1.1.12	✓			
	1.1.13	✓			
	1.1.14	✓			
	1.1.15	✓			
1.2					
	1.2.1	✓			
	1.2.2	✓			
	1.2.3	✓			
	1.2.4	✓			
	1.2.5	✓			
	1.2.6	✓			
1.3					
	1.3.1	✓			
	1.3.2	✓			
	1.3.3	✓			
	1.3.4	✓			
	1.3.5	✓			
	1.3.6	✓			
1.4					
	1.4.1	✓			
	1.4.2	✓			
	1.4.3	✓			
	1.4.4	✓			
	1.4.5	✓			

HOUSING ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable(1)	Not Relevant & Not Applicable		
	1.4.6	✓			
	1.4.7	✓			
	1.4.8	✓			
2.1					
	2.1.1	✓			
	2.1.2	✓			
	2.1.3	✓			
	2.1.4	✓			
	2.1.5	✓			
2.2					
	2.2.1	✓			
	2.2.2	✓			
	2.2.3	✓			
	2.2.4	✓			
	2.2.5	✓			
2.3					
	2.3.1	✓			
	2.3.2	✓			
	2.3.3	✓			
	2.3.4	✓			
	2.3.5	✓			
	2.3.6	✓			
	2.3.7	✓			
	2.3.8	✓			
	2.3.9	✓			
	2.3.10	✓			
2.4					
	2.4.1	✓			
	2.4.2	✓			
	2.4.3	✓			
	2.4.4	✓			
	2.4.5	✓			
3.1					
	3.1.1	✓			
	3.1.2	✓			
	3.1.3	✓			

HOUSING ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable(1)	Not Relevant & Not Applicable		
	3.1.4	✓			
	3.1.5	✓			
	3.1.6	✓			
3.2					
	3.2.1	✓			
	3.2.2	✓			
	3.2.3	✓			
	3.2.4	✓			
	3.2.5	✓			
3.3					
	3.3.1	✓			
	3.3.2	✓			
	3.3.3	✓			
	3.3.4	✓			
TOTALS	75	75			
<p>(1) The EASP does not include any policies that are in direct or indirect conflict with this goal, or any objective or policy associated with this goal. To the extent that these objectives and policies are applicable to any other land development application in Alachua County, they are applicable to the EASP.</p>					

WATER AND WASTEWATER ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable	Not Relevant & Not Applicable		
1.1					
	1.1.1	✓			
	1.1.2	✓			
	1.1.3	✓			
	1.1.3.1	✓			
	1.1.3.2	✓			
	1.1.3.3	✓			
	1.1.3.4	✓			
	1.1.4	✓			
	1.1.5	✓			
2.1					
	2.1.1		✓		
	2.1.2		✓		
	2.1.3	✓			
	2.1.3.1	✓			
	2.1.4				✓
	2.1.5	✓			
	2.1.6	✓			
	2.1.7	✓			
3.1					
	3.1.1	✓			
	3.1.2	✓			
	3.1.3	✓			
	3.1.4		✓		
	3.1.5				✓
	3.1.6				✓
4.1					
	4.1.1	✓			
	4.1.2	✓			
5.1					
	5.1.1	✓			
	5.1.2	✓			
	5.1.3	✓			
6.1					
	6.1.1	✓			
	6.1.2	✓			

WATER AND WASTEWATER ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable	Not Relevant & Not Applicable		
	6.1.3	✓			
	6.1.3.1	✓			
	6.1.3.2	✓			
	6.1.4	✓			
7.1					
	7.1.1	✓			
	7.1.2	✓			
	7.1.3	✓			
	7.1.4	✓			
	7.1.4.1	✓			
8.1					
	8.1.1	✓			
	8.1.2	✓			
	8.1.3	✓			
	8.1.4	✓			
	8.1.5	✓			
	8.1.6	✓			
	8.1.7	✓			
TOTALS	46	40	3	0	3

SOLID WASTE ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable (1)	Not Relevant & Not Applicable		
1.1					
	1.1.1	✓			
	1.1.2	✓			
	1.1.3	✓			
	1.1.4	✓			
1.2					
	1.2.1	✓			
	1.2.2	✓			
	1.2.3	✓			
	1.2.4	✓			
	1.2.5	✓			
	1.2.6	✓			
1.3					
	1.3.1	✓			
	1.3.2	✓			
	1.3.2.1	✓			
	1.3.3	✓			
	1.3.4	✓			
1.4					
	1.4.1	✓			
	1.4.2	✓			
1.5					
	1.5.1	✓			
	1.5.2	✓			
	1.5.3	✓			
	1.5.4	✓			
	1.5.5	✓			
	1.5.6	✓			
	1.5.7	✓			
	1.5.8	✓			
	1.5.9	✓			
	1.5.10	✓			
	1.5.11	✓			
	1.5.12	✓			
1.6					

SOLID WASTE ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable (1)	Not Relevant & Not Applicable		
	1.6.1	✓			
	1.6.2	✓			
	1.6.3	✓			
1.7					
	1.7.1	✓			
	1.7.2	✓			
	1.7.3	✓			
	1.7.4	✓			
	1.7.5	✓			
	1.7.6	✓			
1.8					
	1.8.1	✓			
	1.8.2	✓			
TOTALS	40	40			

(1) The EASP does not include any policies that are in direct or indirect conflict with this goal, or any objective or policy associated with this goal. To the extent that these objectives and policies are applicable to any other land development application in Alachua County, they are applicable to the EASP.

STORMWATER ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable	Not Relevant & Not Applicable		
1.1					
	1.1.1	✓			
	1.1.2	✓			
	1.1.3	✓			
2.1					
	2.1.1	✓			
	2.1.2	✓			
	2.1.3	✓			
	2.1.4	✓			
3.1					
	3.1.1				✓
	3.1.2	✓			
	3.1.3	✓			
	3.1.4	✓			
	3.1.5	✓			
4.1					
	4.1.1	✓			
	4.1.2	✓			
5.1					
	5.1.1	✓			
	5.1.2	✓			
	5.1.3	✓			
	5.1.4	✓			
	5.1.5	✓			
	5.1.6	✓			
	5.1.7	✓			
	5.1.8	✓			
	5.1.9	✓			
	5.1.10	✓			
	5.1.11	✓			
	5.1.12	✓			
6.1					
	6.1.1	✓			
	6.1.2	✓			
	6.1.3	✓			
	6.1.4	✓			

STORMWATER ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable	Not Relevant & Not Applicable		
7.1					
	7.1.1	✓			
	7.1.2	✓			
	7.1.3	✓			
	7.1.4	✓			
	7.1.5	✓			
TOTALS	35	34			1

CONSERVATION AND OPEN SPACE ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable	Not Relevant & Not Applicable		
1.1	Conservation Strategies				
	1.1.1	✓			
1.2	Conservation as Priority				
	1.2.1	✓			
	1.2.2	✓			
2.1	Informaiton System				
	2.1.1	✓			
	2.1.2	✓			
2.2	Education and Outreach				
	2.2.1	✓			
	2.2.2	✓			
	2.2.3	✓			
	2.2.4	✓			
	2.2.5	✓			
	2.2.6	✓			
	2.2.7	✓			
	2.2.8	✓			
2.3	Resource Areas Planning				
	2.3.1	✓			
	2.3.2	✓			
3.1	Conservation Land Use Categories				
	3.1.1				✓
	3.1.2				✓
	3.1.3				✓
	3.1.4				✓
	3.1.5				✓
3.2	Preservation Land Use Categories				
	3.2.1				✓
	3.2.2				✓
	3.2.3				✓
3.3	Future Land Use Map				
	3.3.1	✓		✓	
	3.3.2	✓			
	3.3.3	✓			
	3.3.4	✓			
3.4	Development Review Process				
	3.4.1				✓

CONSERVATION AND OPEN SPACE ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable	Not Relevant & Not Applicable		
	3.4.2			✓	
	3.4.3			✓	
	3.4.4			✓	
3.5	Development Regulations				
	3.5.1		✓		
	3.5.2		✓		
	3.5.3		✓		
3.6	Resource Protection Standards				
	3.6.1				✓
	3.6.2				✓
	3.6.3				✓
	3.6.4				✓
	3.6.5				✓
	3.6.6				✓
	3.6.7				✓
	3.6.8				✓
	3.6.9				✓
	3.6.10				✓
	3.6.11				✓
	3.6.12				✓
	3.6.13				✓
	3.6.14				✓
	3.6.15				✓
4.1	Air Resources				
	4.1.1	✓			
	4.1.2	✓			
	4.1.3	✓			
	4.1.4	✓			
	4.1.5	✓			
	4.1.6	✓			
	4.1.7	✓			
	4.1.8	✓			
	4.1.9	✓			
4.2	Soils and Slopes				
	4.2.1	✓			
	4.2.2	✓			
	4.2.3	✓			

CONSERVATION AND OPEN SPACE ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable	Not Relevant & Not Applicable		
	4.2.4	✓			
	4.2.5	✓			
	4.2.6	✓			
	4.2.7	✓			
	4.2.8	✓			
4.3	Mineral Resources				
	4.3.1	✓			
	4.3.2	✓			
	4.3.3	✓			
	4.3.4	✓			
	4.3.5	✓			
	4.3.6	✓			
	4.3.7	✓			
4.4	Geological Resources				
	4.4.1	✓			
	4.4.2	✓			
	4.4.3	✓			
	4.4.4	✓			
	4.4.5	✓			
	4.4.6	✓			
	4.4.7	✓			
4.5	Groundwater and Springs				
	4.5.1	✓			
	4.5.2	✓			
	4.5.3	✓			
	4.5.4	✓			
	4.5.5	✓			
	4.5.6	✓			
	4.5.7	✓			
	4.5.8	✓			
	4.5.9	✓			
	4.5.10	✓			
	4.5.11	✓			
	4.5.12	✓			
	4.5.13	✓			
	4.5.14	✓			
	4.5.15	✓			

CONSERVATION AND OPEN SPACE ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable	Not Relevant & Not Applicable		
	4.5.16	✓			
	4.5.17	✓			
	4.5.18	✓			
	4.5.19	✓			
	4.5.20	✓			
	4.5.21	✓			
	4.5.22	✓			
4.6	Surface Water Systems				
	4.6.1	✓			
	4.6.2	✓			
	4.6.3	✓			
	4.6.4	✓			
	4.6.5	✓			
	4.6.6	✓			
	4.6.7	✓			
	4.6.8	✓			
	4.6.9	✓			
	4.6.10	✓			
	4.6.11	✓			
	4.6.12	✓			
	4.6.13	✓			
	4.6.14	✓			
	4.6.15	✓			
	4.6.16	✓			
	4.6.17	✓			
	4.6.18	✓			
	4.6.19	✓			
	4.6.20	✓			
	4.6.21	✓			
	4.6.22	✓			
	4.6.23	✓			
	4.6.24	✓			
4.7	Wetland Ecosystems				
	4.7.1	✓			✓(1)
	4.7.2	✓			✓(1)
	4.7.3	✓			✓(1)
	4.7.4	✓			✓(1)

CONSERVATION AND OPEN SPACE ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable	Not Relevant & Not Applicable		
	4.7.5	✓			✓(1)
	4.7.6	✓			✓(1)
	4.7.7	✓			✓(1)
	4.7.8	✓			✓(1)
	4.7.9	✓			✓(1)
	4.7.10	✓			✓(1)
	4.7.11	✓			✓(1)
	4.7.12	✓			✓(1)
4.8	Flood Plain and Floodways				
	4.8.1	✓			✓(1)
	4.8.2	✓			✓(1)
	4.8.3	✓			✓(1)
	4.8.4	✓			✓(1)
	4.8.5	✓			✓(1)
	4.8.6	✓			✓(1)
	4.8.7	✓			✓(1)
	4.8.8	✓			✓(1)
	4.8.9	✓			✓(1)
4.9	Biodiversity				
	4.9.1	✓			
	4.9.2	✓			
	4.9.3	✓			
	4.9.4	✓			
	4.9.5	✓			
	4.9.6	✓			
	4.9.7	✓			
	4.9.8	✓			
	4.9.9	✓			
	4.9.10	✓			
	4.9.11	✓			
	4.9.12	✓			
4.10	Strategic Ecosystem				
	4.10.1				✓
	4.10.2				✓
	4.10.3				✓
	4.10.4				✓
	4.10.5				✓

CONSERVATION AND OPEN SPACE ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable	Not Relevant & Not Applicable		
	4.10.6				✓
	4.10.7				✓
	4.10.8				✓
5.1	Energy Development and Conservation				
	5.1.1	✓			
	5.1.2	✓			
	5.1.3	✓			
	5.1.4	✓			
	5.1.5	✓			
	5.1.6	✓			
5.2	Open Space				
	5.2.1	✓			
	5.2.2	✓			
	5.2.3	✓			
	5.2.4	✓			
	5.2.5	✓			
	5.2.6	✓			
	5.2.7	✓			
5.3	Scenic Quality				
	5.3.1	✓			
	5.3.2	✓			
	5.3.3	✓			
	5.3.4	✓			
	5.3.5	✓			
	5.3.6	✓			
	5.3.7	✓			
	5.3.8	✓			
	5.3.9	✓			
5.4	Vegetation Management				
	5.4.1	✓			
	5.4.2	✓			
	5.4.3	✓			
	5.4.4	✓			
	5.4.5	✓			
	5.4.6	✓			
	5.4.7	✓			
	5.4.8	✓			

CONSERVATION AND OPEN SPACE ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable	Not Relevant & Not Applicable		
	5.4.9	✓			
	5.4.10	✓			
	5.4.11	✓			
	5.4.12	✓			
	5.4.13	✓			
5.5	Agricultural and Silvicultural Practices				
	5.5.1	✓			
	5.5.2	✓			
	5.5.3	✓			
	5.5.4	✓			
	5.5.5	✓			
	5.5.6	✓			
	5.5.7	✓			
	5.5.8	✓			
	5.5.9	✓			
5.6	Wildfire Mitigation				
	5.6.1	✓			
	5.6.2	✓			
	5.6.3	✓			
	5.6.4	✓			
	5.6.5	✓			
	5.6.6	✓			
	5.6.7	✓			
	5.6.8	✓			
5.7	Hazardous Materials				
	5.7.1	✓			
	5.7.2	✓			
	5.7.3	✓			
	5.7.4	✓			
	5.7.5	✓			
	5.7.6	✓			
	5.7.7	✓			
	5.7.8	✓			
	5.7.9	✓			
6.1	Program Overview				
	6.1.1		✓		
	6.1.2		✓		

CONSERVATION AND OPEN SPACE ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable	Not Relevant & Not Applicable		
	6.1.3		✓		
6.2	Alachua County Forever				
	6.2.1		✓		
	6.2.2		✓		
	6.2.3		✓		
	6.2.4		✓		
	6.2.5		✓		
	6.2.6		✓		
	6.2.7		✓		
6.3	Linked Open Space Network				
	6.3.1	✓			
	6.3.2	✓			
	6.3.3	✓			
	6.3.4	✓			
	6.3.5	✓			
	6.3.6	✓			
	6.3.7	✓			
6.4	Other Acquisition Programs				
	6.4.1	✓			
	6.4.2	✓			
	6.4.3	✓			
6.5	Acquisition Toolbox				
	6.5.1	✓			
	6.5.2	✓			
	6.5.3	✓			
	6.5.4	✓			
	6.5.5	✓			
	6.5.6	✓			
6.6	Management				
	6.6.1	✓			
	6.6.2	✓			
	6.6.3	✓			
	6.6.4	✓			
	6.6.5	✓			
	6.6.6	✓			
	6.6.7	✓			
	6.6.8	✓			

CONSERVATION AND OPEN SPACE ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable	Not Relevant & Not Applicable		
	6.6.9	✓			
	6.6.10	✓			
	6.6.11	✓			
TOTALS	265	217	13	4	53
<p>(1) These policies are applicable to the EA-AG, EA-CON and EA-RUR Land Uses. The EASP provides alternate policies for EA-EOMU Land Use because the existing policies do not anticipate development parcels on the scale of the EASP that can offer solutions that protect and enhance large natural systems of wetlands and uplands, rather than just protecting each wetland.</p>					

RECREATION ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable(1)	Not Relevant & Not Applicable		
1.1					
	1.1.1	✓			
	1.1.2	✓			
	1.1.3	✓			
	1.1.4	✓			
	1.1.5	✓			
	1.1.6	✓			
	1.1.7	✓			
	1.1.8	✓			
1.2					
	1.2.1	✓			
	1.2.2	✓			
	1.2.3	✓			
	1.2.4	✓			
	1.2.5	✓			
	1.2.6	✓			
	1.2.7	✓			
1.3					
	1.3.1	✓			
	1.3.2	✓			
	1.3.3	✓			
	1.3.4	✓			
	1.3.5	✓			
	1.3.6	✓			
	1.3.7	✓			
	1.3.8	✓			
	1.3.9	✓			
1.4					
	1.4.1	✓			
	1.4.2	✓			
	1.4.3	✓			
	1.4.4	✓			
	1.4.5	✓			
	1.4.6	✓			
	1.4.7	✓			
	1.4.8	✓			
	1.4.9	✓			

RECREATION ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable(1)	Not Relevant & Not Applicable		
	1.4.10	✓			
1.5					
	1.5.1	✓			
	1.5.2	✓			
	1.5.3	✓			
	1.5.4	✓			
1.6					
	1.6.1	✓			
	1.6.2	✓			
	1.6.3	✓			
1.7					
	1.7.1	✓			
	1.7.2	✓			
	1.7.3	✓			
	1.7.4	✓			
	1.7.5	✓			
	1.7.6	✓			
	1.7.7	✓			
TOTALS	48	48			
<p>(1) The EASP does not include any policies that are in direct or indirect conflict with this goal, or any objective or policy associated with this goal. To the extent that these objectives and policies are applicable to any other land development application in Alachua County, they are applicable to the EASP.</p>					

INTERGOVERNMENTAL COORDINATION ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable (1)	Not Relevant & Not Applicable		
1.1					
	1.1.1	✓			
	1.1.2	✓			
	1.1.3	✓			
	1.1.4	✓			
	1.1.5	✓			
	1.1.6	✓			
	1.1.7	✓			
	1.1.8	✓			
	1.1.9	✓			
	1.1.10	✓			
2.1					
	2.1.1	✓			
	2.1.2	✓			
	2.1.3	✓			
	2.1.4	✓			
	2.1.5	✓			
	2.1.6	✓			
	2.1.7	✓			
	2.1.8	✓			
	2.1.9	✓			
3.1					
	3.1.1	✓			
	3.1.2	✓			
	3.1.3	✓			
	3.1.4	✓			
	3.1.5	✓			
4.1					
	4.1.1	✓			
	4.1.2	✓			
5.1					
	5.1.1	✓			
	5.1.2	✓			
	5.1.3	✓			
	5.1.4	✓			
	5.1.5	✓			
	5.1.6	✓			

INTERGOVERNMENTAL COORDINATION ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable (1)	Not Relevant & Not Applicable		
	5.1.7	✓			
	5.1.8	✓			
	5.1.9	✓			
	5.1.10	✓			
	5.1.11	✓			
6.1					
	6.1.1	✓			
	6.1.2	✓			
	6.1.3	✓			
	6.1.4	✓			
	6.1.5	✓			
7.1					
	7.1.1	✓			
	7.1.2	✓			
	7.1.3	✓			
	7.1.4	✓			
	7.1.5	✓			
	7.1.6	✓			
	7.1.7	✓			
	7.1.8	✓			
	7.1.9	✓			
	7.1.10	✓			
8.1					
	8.1.1	✓			
	8.1.2	✓			
TOTALS	54	54			

(1) The EASP does not include any policies that are in direct or indirect conflict with this goal, or any objective or policy associated with this goal. To the extent that these objectives and policies are applicable to any other land development application in Alachua County, they are applicable to the EASP.

CAPITAL IMPROVEMENT ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable	Not Relevant & Not Applicable		
1.1					
	1.1.1	✓			
	1.1.2	✓			
	1.1.3	✓			
	1.1.4	✓			
	1.1.5	✓			
1.2					
	1.2.1	✓			
	1.2.2	✓			
	1.2.3	✓			
	1.2.4	✓			✓(1)
	1.2.5	✓			
1.3					
	1.3.1	✓			
	1.3.2	✓			✓(1)
	1.3.3	✓			
1.4					
	1.4.1		✓		
	1.4.2		✓		
	1.4.3		✓		
	1.4.4		✓		
1.5					
	1.5.1		✓		
	1.5.2		✓		
1.6					
	1.6.1		✓		
	1.6.2		✓		
	1.6.3		✓		
	1.6.4		✓		
	1.6.5		✓		
	1.6.6		✓		
	1.6.7		✓		
	1.6.8		✓		
	1.6.9		✓		
	1.6.10		✓		
	1.6.11		✓		
	1.6.12		✓		

CAPITAL IMPROVEMENT ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable	Not Relevant & Not Applicable		
	1.6.13		✓		
1.7					
	1.7.1		✓		
	1.7.2		✓		
	1.7.3		✓		
	1.7.4		✓		
1.8					
	1.8.1	✓			
	1.8.2	✓			
	1.8.3	✓			
	1.8.4	✓			
1.9					
	1.9.1	✓			
	1.9.2	✓			
	1.9.3				✓
	1.9.4	✓			
1.10					
	1.10.1		✓		
	1.10.2		✓		
	1.10.3		✓		
	1.10.4		✓		
	1.10.5		✓		
1.11					
	1.11.1	✓			
	1.11.2	✓			
	1.11.3	✓			
	1.11.4	✓			
	1.11.5	✓			
TOTALS		54	25	28	0
					3
(1) The proposed amendment to Policy 1.2.4 only revises a portion of the policy, the remainder is applicable to the EASP.					

ECONOMIC ELEMENT

			ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
			Relevant & Applicable(1)	Not Relevant & Not Applicable		
1.1 Economic Diversity and Sustainability						
		1.1.1	✓			
		1.1.2	✓			
		1.1.3	✓			
		1.1.4	✓			
		1.1.5	✓			
		1.1.6	✓			
		1.1.7	✓			
		1.1.8	✓			
		1.1.9	✓			
		1.1.10	✓			
1.2 Economic Development Strategy						
		1.2.1	✓			
		1.2.2	✓			
		1.2.3	✓			
		1.2.4	✓			
		1.2.5	✓			
		1.2.6	✓			
		1.2.7	✓			
		1.2.8	✓			
		1.2.9	✓			
		1.2.10	✓			
		1.2.11	✓			
		1.2.12	✓			
		1.2.13	✓			
		1.2.14	✓			
		1.2.15	✓			
		1.2.16	✓			
		1.2.17	✓			
		1.2.18	✓			
1.3 Environmental Quality and Resource Conservation						
		1.3.1	✓			
		1.3.2	✓			
		1.3.3	✓			
1.4 Education and Employment						
		1.4.1	✓			

ECONOMIC ELEMENT

			ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard	
			Relevant & Applicable(1)	Not Relevant & Not Applicable			
		1.4.2	✓				
		1.4.3	✓				
		1.4.4	✓				
1.5	Expand Economic Opportunities and Reduce Poverty						
		1.5.1	✓				
		1.5.2	✓				
		1.5.3	✓				
		1.5.4	✓				
		1.5.5	✓				
		1.5.6	✓				
		1.5.7	✓				
		1.5.8	✓				
		1.5.9	✓				
		1.5.10	✓				
		1.5.11	✓				
1.6	Livable Communities						
		1.6.1	✓				
		1.6.2	✓				
		1.6.3	✓				
TOTALS		49	49				
<p>(1) The EASP does not include any policies that are in direct or indirect conflict with this goal, or any objective or policy associated with this goal. To the extent that these objectives and policies are applicable to any other land development application in Alachua County, they are applicable to the EASP.</p>							

HISTORIC PRESERVATION ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable (1)	Not Relevant & Not Applicable		
1.1					
	1.1.1	✓			
	1.1.2	✓			
	1.1.3	✓			
	1.1.4	✓			
	1.1.5	✓			
	1.1.6	✓			
2.1					
	2.1.1	✓			
	2.1.2	✓			
	2.1.3	✓			
	2.1.4	✓			
	2.1.5	✓			
	2.1.6	✓			
	2.1.7	✓			
	2.1.8	✓			
3.1					
	3.1.1	✓			
	3.1.2	✓			
	3.1.3	✓			
	3.1.4	✓			
4.1					
	4.1.1	✓			
	4.1.2	✓			
	4.1.3	✓			
5.1					
	5.1.1	✓			
TOTALS	22	22			
<p>(1) The EASP does not include any policies that are in direct or indirect conflict with this goal, or any objective or policy associated with this goal. To the extent that these objectives and policies are applicable to any other land development application in Alachua County, they are applicable to the EASP.</p>					

PUBLIC SCHOOL FACILITIES ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable (1)	Not Relevant & Not Applicable		
1.1 Coordinate Land Use and School Capacity					
	1.1.1	✓			
	1.1.2	✓			
	1.1.3	✓			
	1.1.4	✓			
	1.1.5	✓			
	1.1.6	✓			
	1.1.7	✓			
	1.1.8	✓			
	1.1.9	✓			
2.1 Implement School Concurrency					
	2.1.1	✓			
	2.1.2	✓			
2.2 Level of Service Standard					
	2.2.1	✓			
	2.2.2	✓			
	2.2.3	✓			
2.3 School Concurrency Service Areas					
	2.3.1	✓			
	2.3.2	✓			
	2.3.3	✓			
2.4 School Concurrency Review Process					
	2.4.1	✓			
	2.4.2	✓			
	2.4.3	✓			
	2.4.4	✓			
	2.4.5	✓			
	2.4.6	✓			
	2.4.7	✓			
	2.4.8	✓			
	2.4.9	✓			
2.5 Proportionate Share Mitigation					
	2.5.1	✓			
	2.5.2	✓			
	2.5.3	✓			
	2.5.4	✓			
2.6 Adoption of SBAC Five-Year Work Program					

PUBLIC SCHOOL FACILITIES ELEMENT

			ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
			Relevant & Applicable (1)	Not Relevant & Not Applicable		
		2.6.1	✓			
3.1	School Location and Site Design					
		3.1.1	✓			
		3.1.2	✓			
		3.1.3	✓			
3.2	Encourage Schools as Focal Points of Community Planning & Design					
		3.2.1	✓			
3.3	Consider Compatibility of Uses Adjacent to Public Schools					
		3.3.1	✓			
3.4	Coordinate with SBAC on Reduction of Hazardous Walking Conditions					
		3.4.1	✓			
3.5	School Siting Standards					
		3.5.1	✓			
3.6	School Development Standards					
		3.6.1	✓			
3.7	Coordinate Supporting Infrastructure					
		3.7.1	✓			
4.1	School Board Representation					
		4.1.1	✓			
		4.1.2	✓			
4.2	Joint Meetings					
		4.2.1	✓			
		4.2.2	✓			
4.3	Coordinate Student Enrollment and Population Projections					
		4.3.1	✓			
		4.3.2	✓			
		4.3.3	✓			
		4.3.4	✓			
		4.3.5	✓			
4.4	School Site Selection, Expansions and Closures					
		4.4.1	✓			
		4.4.2	✓			
		4.4.3	✓			
		4.4.4	✓			
5.1	Coordinate the Comprehensive Plan with School Facilities Plans					
		5.1.1	✓			
		5.1.2	✓			

PUBLIC SCHOOL FACILITIES ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable (1)	Not Relevant & Not Applicable		
	5.1.3	✓			
TOTALS		56	56		

(1) The EASP does not include any policies that are in direct or indirect conflict with this goal, or any objective or policy associated with this goal. To the extent that these objectives and policies are applicable to any other land development application in Alachua County, they are applicable to the EASP.

COMMUNITY HEALTH ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable (1)	Not Relevant & Not Applicable		
1.1					
	1.1.1	✓			
	1.1.2	✓			
	1.1.3	✓			
	1.1.4	✓			
	1.1.5	✓			
	1.1.6	✓			
	1.1.7	✓			
	1.1.8	✓			
1.2					
	1.2.1	✓			
	1.2.2	✓			
	1.2.3	✓			
	1.2.4	✓			
	1.2.5	✓			
1.3					
	1.3.1	✓			
	1.3.1.1	✓			
	1.3.1.2	✓			
	1.3.1.3	✓			
	1.3.1.4	✓			
	1.3.2	✓			
	1.3.2.1	✓			
	1.3.2.2	✓			
	1.3.2.3	✓			
	1.3.2.4	✓			
	1.3.2.5	✓			
	1.3.2.6	✓			
1.4					
	1.4.1	✓			
	1.4.2	✓			
	1.4.3	✓			
1.5					
	1.5.1	✓			
	1.5.1.1	✓			
	1.5.1.2	✓			
	1.5.1.3	✓			

COMMUNITY HEALTH ELEMENT

		ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
		Relevant & Applicable (1)	Not Relevant & Not Applicable		
TOTALS	32	32			
<p>(1) The EASP does not include any policies that are in direct or indirect conflict with this goal, or any objective or policy associated with this goal. To the extent that these objectives and policies are applicable to any other land development application in Alachua County, they are applicable to the EASP.</p>					

ENERGY ELEMENT

			ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
			Relevant & Applicable (1)	Not Relevant & Not Applicable		
1.1	Reduction Goals					
		1.1.1	✓			
		1.1.2	✓			
		1.1.3	✓			
2.1	Community					
		2.1.1	✓			
		2.1.2	✓			
		2.1.2.1	✓			
		2.1.2.2	✓			
		2.1.2.3	✓			
		2.1.3	✓			
2.2	County Government					
		2.2.1	✓			
		2.2.2	✓			
		2.2.3	✓			
		2.2.4	✓			
3.1						
		3.1.1	✓			
		3.1.2	✓			
		3.1.3	✓			
		3.1.3.1	✓			
		3.1.3.2	✓			
		3.1.4	✓			
		3.1.5	✓			
3.2						
		3.2.1	✓			
		3.2.2	✓			
		3.2.2.1	✓			
		3.2.2.2	✓			
		3.2.3	✓			
		3.2.4	✓			
3.3						
		3.3.1	✓			
4.1						
		4.1.1	✓			
		4.1.2	✓			
		4.1.3	✓			

ENERGY ELEMENT

			ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
			Relevant & Applicable (1)	Not Relevant & Not Applicable		
4.2						
	4.2.1		✓			
	4.2.2		✓			
	4.2.3		✓			
	4.2.4		✓			
4.3						
	4.3.1		✓			
	4.3.2		✓			
	4.3.3		✓			
5.1						
	5.1.1		✓			
	5.1.2		✓			
	5.1.3		✓			
	5.1.4		✓			
	5.1.5		✓			
	5.1.6		✓			
	5.1.7		✓			
5.2						
	5.2.1		✓			
	5.2.2		✓			
	5.2.3		✓			
6.1						
	6.1.1		✓			
	6.1.2		✓			
	6.1.3		✓			
	6.1.4		✓			
6.2						
	6.2.1		✓			
	6.2.2		✓			
6.3						
	6.3.1		✓			
	6.3.2		✓			
	6.3.3		✓			
	6.3.4		✓			
	6.3.5		✓			
6.4						
	6.4.1		✓			

ENERGY ELEMENT

			ACCP Policies Not Superseded by EA Sector Plan Policies		EA Sector Plan incorporates existing plan policies into the Sector Plan policies	EA Sector Plan introduces alternative policy(ies) as a standard
			Relevant & Applicable (1)	Not Relevant & Not Applicable		
		6.4.2	✓			
		6.4.3	✓			
7.1						
		7.1.1	✓			
		7.1.2	✓			
7.2						
		7.2.1	✓			
		7.2.2	✓			
8.1						
		8.1.1	✓			
		8.1.2	✓			
		8.1.3	✓			
		8.1.4	✓			
		8.1.5	✓			
9.1						
		9.1.1	✓			
		9.1.2	✓			
		9.1.3	✓			
		9.1.4	✓			
TOTALS		74	74			

(1) The EASP does not include any policies that are in direct or indirect conflict with this goal, or any objective or policy associated with this goal. To the extent that these objectives and policies are applicable to any other land development application in Alachua County, they are applicable to the EASP.

H. UNDEFINED TERMS

STAFF COMMENT H.2:

Agro-industrial uses

Please define “agro-industrial” uses (proposed Policy 10.2.4) as that term is not found in Alachua County’s current comprehensive plan or land development regulations. Provide examples.

COMMENT SUMMARY:

H.2. Define Agro-industrial uses;

H.2.a. Provide examples of agro-industrial uses.

RESPONSE

The intent was to permit industrial uses that are related to the agricultural uses on the land. In an effort to clarify this intent, a proposed revision of Policy 10.2.4 has been prepared as follows:

Policy 10.2.4 Agriculture (EA-AG)

Permitted uses with the EA-AG land use category on the Future Land Use Map include agricultural activities including forestry; silviculture; mining, excavation and fill operations; ~~agro-industrial uses~~; and other agricultural uses, such as cattle grazing, cultivation of field crops, vegetable crops, dairies and those commercial or other uses on a limited scale serving or ancillary to agricultural activities, such as associated research facilities, farm equipment and supplies, sales or service, farmers’ markets, agritourism activities, composting, limited agricultural processing as provided in Policy 6.1.8 of the Future Land Use Element, **limited industrial uses related to agriculture** and agricultural products distribution. Rural residential uses, home-based businesses, heritage tourism and ecotourism activities, resource-based recreation and outdoor activity-based recreation, water conservation and retention/detention areas that are determined to be appropriate for stormwater management are also allowed. Other uses involving animals not normally associated with agricultural activities, which would be suitable in the EA-RUR areas, such as animal sanctuaries, kennels, and commercial animal raising are permitted. New residential uses at a maximum density of one dwelling unit per 40 acres shall be permitted.

H. UNDEFINED TERMS

STAFF COMMENT H.3:

Forestry / Silviculture

Please explain the difference between “forestry” and “silviculture” as both terms are used in proposed Policy 10.2.4.

COMMENT SUMMARY:

H.3. Explain the difference between forestry and silviculture.

RESPONSE

For the purposes of this land use policy there is no practical distinction between forestry and silviculture. In an effort to clarify this intent, a proposed revision of Policy 10.2.4 has been prepared which deletes the term “forestry”:

Policy 10.2.4 Agriculture (EA-AG)

Permitted uses with the EA-AG land use category on the Future Land Use Map include agricultural activities including ~~forestry~~; silviculture; mining, excavation and fill operations; ~~agro-industrial uses~~; and other agricultural uses, such as cattle grazing, cultivation of field crops, vegetable crops, dairies and those commercial or other uses on a limited scale serving or ancillary to agricultural activities, such as associated research facilities, farm equipment and supplies, sales or service, farmers’ markets, agritourism activities, composting, limited agricultural processing as provided in Policy 6.1.8 of the Future Land Use Element, ~~limited industrial uses related to agriculture~~ and agricultural products distribution. Rural residential uses, home-based businesses, heritage tourism and ecotourism activities, resource-based recreation and outdoor activity-based recreation, water conservation and retention/detention areas that are determined to be appropriate for stormwater management are also allowed. Other uses involving animals not normally associated with agricultural activities, which would be suitable in the EA-RUR areas, such as animal sanctuaries, kennels, and commercial animal raising are permitted. New residential uses at a maximum density of one dwelling unit per 40 acres shall be permitted.

H. UNDEFINED TERMS

STAFF COMMENT H.4:

Resource Based Open Space (RBOS)

Please define Resource Based Open Space (RBOS).

COMMENT SUMMARY:

H.4. Define Resource Based Open Space.

RESPONSE

The Resource Based Open Space (RBOS) is defined in Policy 10.2.6.6. as provided below:

Policy 10.2.6.6 EA-EOMU Resource-Based Open Space (RBOS)
Areas shall be identified through the DSAP process to create the RBOS as a means to further protect and enhance environmental systems. RBOS areas shall be designed to the extent practicable to eliminate or minimize fragmentation and promote habitat connectivity and the formation of linked networks to adjacent properties managed for conservation purposes. RBOS shall not include parcels identified for development (including, but not limited to individual yards, active open space, or civic open space). RBOS lands may include areas set aside for ecological preservation, enhancement and restoration, nature trails, conservation education programs, observation decks and similar facilities including lakes used for detention and retention of surface water. RBOS may include, flood plains, wetlands, mitigation areas, vegetative buffers, specialized habitat for flora or fauna, passive recreation areas, and water resource development areas, and shall be designated during the development review process. At least 15% of the total area within the EA-EOMU shall be designated as RBOS during the DSAP process. RBOS shall have a public access plan for trails, boardwalks, and environmental education areas, and for passive recreational use where appropriate.

Because the term Resource Based Open Space is introduced in the policies prior to Policy 10.2.6.6 where it is defined, a proposed revision to Policy 10.2.5.3 (the first place in the text of the policies where the term is used) has been prepared which directs the reader to the appropriate policy for the definition.

Policy 10.2.5.3 Conservation (EA-CON) Management Plans (excerpt)
Management Plans are required for EA-CON lands not later than one year of inclusion of those lands within a state or federal environmental permit mitigation plan. Implementation of a conservation management plan shall be adequately funded by the owner, or its successors in interest. The conservation management plan shall set resource protection standards and management protocols designed to ensure the long-term maintenance of the ecology of Conservation and Resource Based Open Space (RBOS) areas (see Policy 10.2.6.6 for RBOS definition).

I. GENERAL EDITS

STAFF COMMENT I:

Resource Based Open Space (RBOS)

1. Proposed Policy 10.2.6.11 references proposed Policy 10.3.3. The reference should be to Policy 10.3.2. Please correct.
2. Two maps in the Transportation Data & Analysis section have the Conservation and Agriculture Land Use labels reversed (Fig. 1. Framework Map; Fig. 2. TAZ Structure). Please correct.
3. The following maps and tables did not print correctly:

p. 23, Soils Map

p. 26, Vegetative Communities

pp. 28-32, Table 3.7-1 Existing Conservation Easements

COMMENT SUMMARY:

General edits.

RESPONSE

ITEM 1.

The requested revision has been made.

Policy 10.2.6.11 EA-EOMU Wetlands Buffers

Wetland ecosystems protected pursuant to federal and state permits shall be further protected from potential development impacts by buffers with minimum widths established in Policy 10.3.23.

ITEM 2.

The two maps have been corrected and are included in the attached revised Transportation Data and Analysis Report.

ITEM 3.

The referenced maps and tables have been corrected to enable them to print and are included in the attached revised Environmental Data and Analysis Report.