



ALACHUA COUNTY DEPARTMENT OF GROWTH MANAGEMENT

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PO Box 357700
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Re: Sufficiency Review of the Envision Alachua Sector Plan/Comprehensive Plan Amendment Application

Dear Mr. Jackson,

Alachua County staff has begun review of the Plum Creek Sector Plan/Comprehensive Plan amendment submittal. In order for staff to complete the review and analysis of the application, there are several areas of completeness/sufficiency for which more information is needed.

Sector Plan Statutory Requirements (163.3245, F.S.)

Section 163.3245 (3)(a)1., F.S. requires as part of the long-term master plan that "a framework map shall be provided 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."

1. 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.

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.



2. 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.
3. 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.

Florida Statutes 163 Part II Comprehensive Plan Amendment Requirements

Florida Statutes Section 163.3177, F.S. includes requirements for Comprehensive Plans and Plan amendments. Some of those requirements include:

- Meaningful predictable standards for the use and development of land,
- Capital improvements element with a component that outlines principles for construction, extension or increase in public facilities including estimates of public facilities costs, timing of construction, location and revenue sources,
- Amendments shall be based on surveys, studies and data regarding the area including availability of water supplies, public facilities and services,
- Future land use map amendments shall include analysis of the availability of facilities and services including current and future capacity and needs,
- The future land use map or map series shall include:
 - proposed distribution, extent and location of uses including multi-modal district boundaries, floodplains, wetlands, minerals and soils, etc.;
 - a general location of existing and proposed transportation system features
 - sanitary sewer, solid waste, drainage, potable water and groundwater recharge including a description of general facilities required for solution of problems and needs and shall address coordinating the extension or increase in capacity of facilities to meet future needs.

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.

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.

Comprehensive Plan Consistency Analysis

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.

Public Schools Analysis

The Comprehensive Plan Public Schools Facilities Element Policy 1.1.3 and the Interlocal Agreement For Public School Facility Planning Section 6.3 provide for the analysis of Comprehensive Plan amendments distinct from concurrency reviews for individual development plans. Policy 1.1.3 specifically states:

For purposes of coordinating land use decision with school capacity planning, the School Concurrency Service Areas (SCSAs) that are established for high, middle and elementary schools as part of the Interlocal Agreements for Public School Facility Planning shall be used for school capacity planning. The relationship of high, middle and elementary capacity and students anticipated to be generated as a result of land use decisions shall be assessed in terms of its impact on (1) on the school systems as a whole and (2) on the applicable SCSA(s). *For purposes of this planning assessment, existing or planned capacity in adjacent SCSAs shall not be considered.* [emphasis added]

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.

Transportation

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.

1. 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.
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.
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.
4. Other Modelling Issues
 - a. 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.

- b. 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.
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 buildout 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.

Natural Resources

1. 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.
2. 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.
3. 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.
4. 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).

Impacts on the Cost of Housing

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.

Undefined terms

1. 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.
2. 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.
3. Please explain the difference between "forestry" and "silviculture" as both terms are used in proposed Policy 10.2.4.
4. Please define Resource Based Open Space (RBOS).

General Edits

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

Please ensure that all submitted maps, tables, etc. contain the same information on the electronic form.

We are available to meet to discuss the above issues. We look forward to receiving the information requested in this letter in order to have a complete application for our analysis and review.

Sincerely,



Missy Daniels, AICP
Senior Planner

xc: (by e-mail)

Betty M. Baker, County Manager
Michael J. Fay, Acting Assistant County Manager
David Wagner, County Attorney
Michele Lieberman, County Attorney's Office