

BEST PRACTICES REPORT

ALACHUA COUNTY UNIFIED LAND DEVELOPMENT CODE (TITLE 40) UPDATE

Prepared for:

Alachua County Board of County Commissioners

Prepared by:

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142872000

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ACKNOWLEDGEMENTS

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INTRODUCTION & OVERVIEW

Introduction

Alachua County is located in North Central Florida bounded by Marion, Levy, Gilchrist, Columbia, Union, Bradford, Clay, and Putnam Counties (See **Map 1**). As of 2019, the estimated population was of 269,043¹.

Alachua County (“County”) adopted a major Comprehensive Plan update in November of 2019. The update included numerous policy revisions that require implementation in the Alachua County Land Development Regulations (Title 40, Alachua County Code) which are known as the Unified Land Development Code (ULDC or “Code”). The County’s ULDC was last comprehensively updated in 2005. Between 2005 and today, a significant number of amendments and revisions have been made to the ULDC to coincide with policy directives of the Alachua County Commission. As such, the County has initiated a project to holistically update the ULDC.

A well-prepared code will provide reliability during the development process by implementing the long-range vision set forth in the Comprehensive Plan. Similarly, when land development code regulations do not align with the community’s ideas, conflict with one another, or are out of date, the assured result is development that does not represent the desires of the overall community.

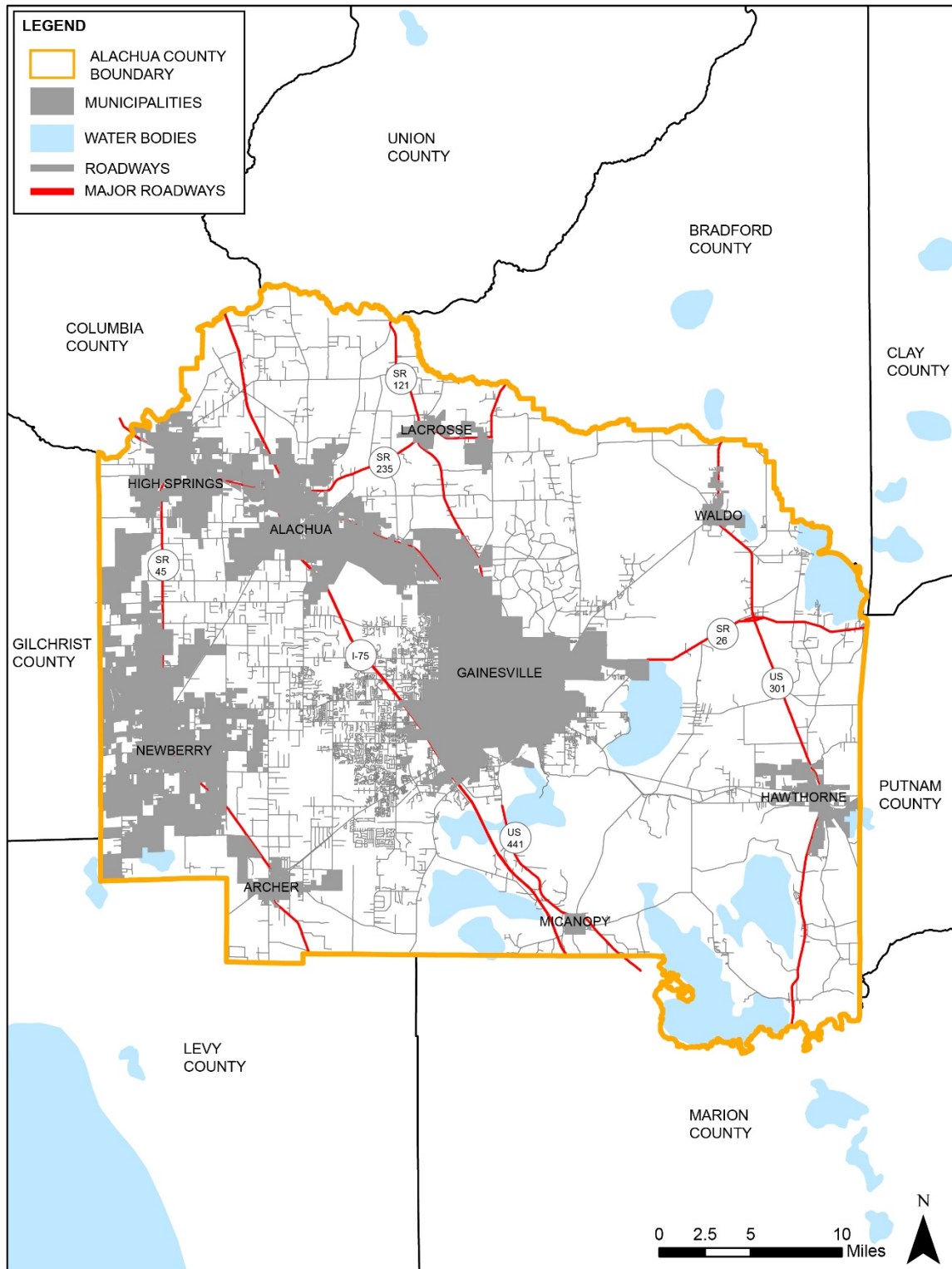
Overview

This Best Practices Report represents a comprehensive assessment of Title 40 of Alachua County’s ULDC and provides specific recommendations for making amendments to those regulations with the goal of providing more predictability, ease of use, and a better experience for users of the Code. The following benchmark standards for success can be used to guide the drafting of the County’s land development regulations, with the goal that the new standards lead to design implementation that coincides and furthers the vision of Alachua County. These benchmarks include:

- clear, concise and understandable review and approval standards that provide Staff, Boards and the County Commission the ability to be consistent in making determinations;
- meaningful citizen input prior to adoption;
- a logical organization for ease of use;
- illustrations that help to tell the story;
- standards and decision-making processes that are legally-defensible; and
- provisions for enforcement and administration of the ULDC that are realistic and achievable.

¹ U.S. Census, Vintage 2019 Population Estimates

The assessment of the ULDC is intended to be a non-biased review of current regulations. This report is a proactive effort to diagnose issues and make corrective changes to provide a current document that is user-friendly.



Map 1 – Alachua County Boundaries (Source: Kimley-Horn, April 2020) BACKGROUND

Title 40 of the ULDC contains the Alachua County Land Development Regulations. Other components of the ULDC will be reviewed during this process as background information and to help provide context. The ULDC update project seeks to complement the County's assets while at the same time directing growth in locations that are appropriate. Alachua County retained Kimley-Horn to facilitate this process and to work alongside County Growth Management Staff to complete the update.

ULDC Update Process

The schedule for the ULDC update project contains three (3) major steps:



Figure 1 - ULDC Update three (3) major steps

A. Data Collection

i. Existing Documents Review

The Alachua County ULDC update project began in November of 2019. Existing documents were gathered including the recently updated Comprehensive Plan, ULDC, County Charter, and other planning-related documents. This allowed us to gain a better understanding of existing policy directives, and an identification of some of the complexities and challenges that may arise during the ULDC update.

ii. Community Tour

A team of planning and zoning experts went on a tour of Alachua County with County Staff. This tour was conducted in January 2020 and was based upon representative projects within the County identified by County Staff. This tour allowed the team to understand from staff what they believe is working and not working when actually constructed in the field. The team was able to identify areas of the ULDC that may require some modifications to better represent what was envisioned in the ULDC standards.

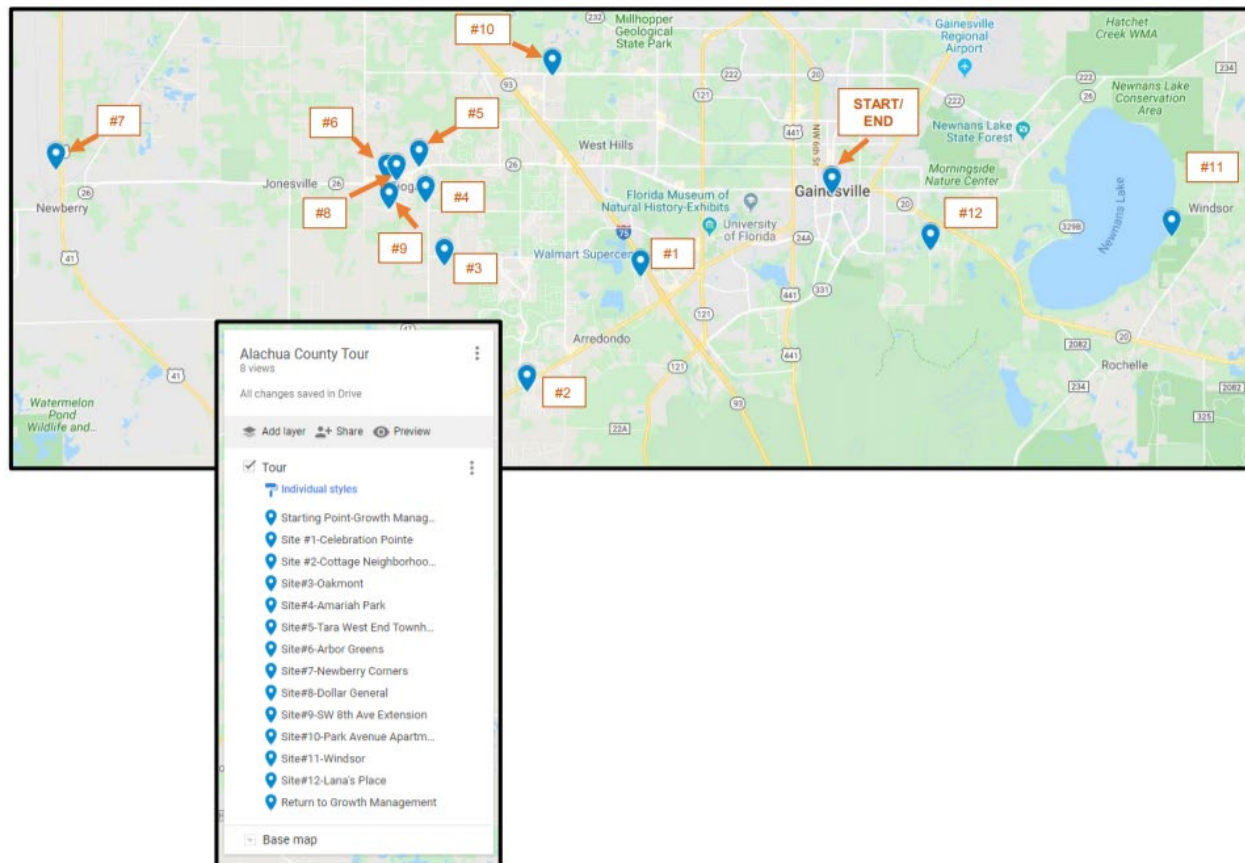


Figure 2 – Community Tour Map

B. Best Practices Report

i. Stakeholder Interviews

The team also conducted a series of stakeholder meetings and phone calls. These small group interviews were designed to keep the conversation focused to areas of particular interest of the stakeholders and included community partners such as utility providers, engineers, planners and related professionals, representatives from the environmental and climate change community, large property owners, Home Builders' Association members, and land use attorneys. There were also meetings with individual County department staff. Kimley-Horn also presented the project with a Kick Off Presentation to the Board of County Commissioners in January 2020.

This input provided the background and knowledge of what is currently working versus where improvements could be made based on disconnects among documents, inconsistencies, and practical applications of the regulations. Information collected through the community tour, comments from stakeholders, and data collection and analyses influenced the commentary within this report and the recommendations made herein.

ii. Website

The project team encourages all members of the public to participate by attending meetings, reviewing work product, and providing input. As part of public input, the Alachua County Growth Management Department is providing links to the ULDC materials to their website. A ULDC Update Survey is provided at www.growth-management.alachuacounty.us/Development/ULDCSurvey. Additionally, as dates become available for upcoming events, workshops, and presentations, and as work products are completed, they will be published on the site.



Figure 3 – Alachua County ULDC Update Survey

iii. Overview of the Best Practices Report

This Best Practices Report was prepared immediately following the adoption of the new Alachua County Comprehensive Plan. This Report works to synthesize the ULDC updates necessitated by the Comprehensive Plan update, along with goals identified by stakeholders that need to be accomplished throughout the ULDC update process. It provides the basis for the full update of the ULDC and a reference guide for future ULDC updates.

This Report is organized into three parts and an Appendix. Part I is this introduction and overview. Part II is an Assessment, which discusses the key goals and themes for the project, along with considerations and options for how the key goals can be achieved in the new ULDC. Part III includes the recommendations for next steps in the ULDC update project.

The new ULDC will help facilitate the community's vision for future growth and development as directed in the Comprehensive Plan and by the Alachua County Board of County Commissioners. With input from County staff, residents, business and property owners, and direction from the County Commission, the Assessment provides the framework for identifying the key themes that

need to be addressed in the ULDC to implement the Comprehensive Plan and accomplish other important community goals. The key themes include updating the ULDC will be:

- Encouragement of sustainable development practices with climate change in mind;
- Support of higher-density, walkable, mixed-use places in appropriate locations;
- Enhanced design and form standards for mixed-use, commercial, and multifamily development;
- Protection of agricultural land from urban development encroachment; and
- Support connections to various forms of open space, such as parks and natural resources.

This Assessment will serve as the roadmap for the drafting of the new ULDC.

I. Introduction and Overview
II. Assessment
Theme 1: Create a User-Friendly Unified Land Development Code
Theme 2: Areas of Focus Identified by County Staff
Theme 3: Implement the Comprehensive Plan
III. Recommended Next Steps
Appendix A – Amendment Matrix
Attachment A – Community Tour

Figure 4 – Overview of the Best Practices Report

II. ASSESSMENT

Theme 1: Create a User-Friendly Unified Land Development Code

It is important to understand that the current Alachua County ULDC does not need to be discarded and rewritten. Through the data analysis component and input sections of this process, it was evident that this was clearly an update process rather than a complete rewrite. There were multiple examples that demonstrated that many elements of the current regulations are working exactly the way County Staff and County Administration intends for them to work.

Outline of Current Alachua County ULDC - Title 40

Chapter 400:	General Provisions
Chapter 401:	Development Review Bodies
Chapter 402:	Development Application Review Procedures and Contents
Chapter 403:	Zoning Districts
Chapter 404:	Use Regulations
Chapter 405:	Special Districts and Activity Centers
Chapter 406:	Natural and Historic Resources Protection
Chapter 407:	General Development Standards
Chapter 408:	Nonconformities
Chapter 409:	Violations, Penalties and Enforcement
Chapter 410:	Definitions

Figure 5 Outline of Current Alachua County ULDC Title 40

A. Logical and Intuitive Structure

The current ULDC currently includes 11 chapters (Chapters 400 through 410). The chapters are each divided into articles, which are further divided into sections. The division of Title 40 – LAND DEVELOPMENT REGULATIONS is provided in the sidebar.

A common comment heard throughout the Data Collection of the ULDC Update was that the Code is currently not easy to use. It is unclear, bulky, and generally difficult to navigate. Specifically, the ULDC:

- Lacks definitions;
- Is difficult to understand due to terminology;
- Does not result in built projects reflective of the intent of the regulations;
- Has formatting that is challenging to understand;
- Does not include enough graphical representation and/or tables that clearly explain the regulations;
- Has irrelevant and/or antiquated regulations; and
- Is cumbersome.

A primary focus of the ULDC update will be to simplify the document, make it a better user experience, and less challenging for citizens, stakeholders, Elected Officials, and County Staff to use. The Alachua County ULDC should be organized in a manner that makes practical sense, allowing the user to easily navigate through it to find information quickly. Text should be presented in layman terms/plain English so that everyone can understand it and not leave much to interpretation; pictures/diagrams/flowcharts and other graphics should be included to illustrate zoning concepts and complex regulations. This goal will be to allow readers to easily understand the relationships between different parts of the Code.

B. Improve Formatting and Referencing

CITY OF FLAGLER BEACH LAND DEVELOPMENT CODE CHAPTER III. – ZONING																																					
SECTION 3.02.02. - DESIGNATION OF ZONING DISTRICT.																																					
The designation of zoning districts is controlled by Land Use as depicted on the City of Flagler Beach Future Land Use Map 2035. Zoning designations must correspond with the underlying land use designations; i.e., residential zoning designation must have an underlying residential land use designation; commercial zoning have an underlying commercial land use; etc.																																					
SECTION 3.02.03. - ZONING MAP.																																					
The City's zoning districts are bounded as shown on the map entitled "Official Zoning Map", which is hereby made a part of the Land Development Code.																																					
The original maps, properly attested, are and shall remain on file in the office of the City Clerk.																																					
A record by date and number of all rezoning ordinances shall be a supplementary part of the Official Zoning Map.																																					
SECTION 3.02.04. - INTERPRETATION OF BOUNDARIES.																																					
1) DESIGNATION OF DISTRICT BOUNDARIES.																																					
The district boundary lines are intended generally to follow the centerlines of waterways, streets, and railroad rights-of-way, existing lot lines, legal section lines or county and municipal boundary lines, as shown in the zoning map; but where a district boundary line does not follow such a line, its position is shown on said zoning map by the scaled dimension expressing its distance in feet from a street centerline or other boundary as indicated. Where a district boundary line divides a lot																																					
<table border="1"> <tr> <th colspan="2">ZONING DISTRICTS ESTABLISHED</th></tr> <tr> <th colspan="2">Recreation and Open Space</th></tr> <tr> <td>P</td><td>Preservation</td></tr> <tr> <td>C</td><td>Conservation</td></tr> <tr> <td>REC</td><td>Recreation</td></tr> <tr> <th colspan="2">Residential</th></tr> <tr> <td>LDR</td><td>Low Density Residential</td></tr> <tr> <td>MDR</td><td>Medium Density Residential</td></tr> <tr> <td>HDR</td><td>High Density Residential</td></tr> <tr> <th colspan="2">Commercial</th></tr> <tr> <td>TC</td><td>Tourist Commercial</td></tr> <tr> <td>GC</td><td>General Commercial</td></tr> <tr> <td>HC</td><td>Highway Commercial</td></tr> <tr> <th colspan="2">Public Facilities</th></tr> <tr> <td>PF</td><td>Public Facilities</td></tr> <tr> <th colspan="2">Master Planned Development</th></tr> <tr> <td>MPD</td><td>Master Planned Development</td></tr> <tr> <td>REC/PD</td><td>Recreation/PD</td></tr> </table>		ZONING DISTRICTS ESTABLISHED		Recreation and Open Space		P	Preservation	C	Conservation	REC	Recreation	Residential		LDR	Low Density Residential	MDR	Medium Density Residential	HDR	High Density Residential	Commercial		TC	Tourist Commercial	GC	General Commercial	HC	Highway Commercial	Public Facilities		PF	Public Facilities	Master Planned Development		MPD	Master Planned Development	REC/PD	Recreation/PD
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Commercial																																					
TC	Tourist Commercial																																				
GC	General Commercial																																				
HC	Highway Commercial																																				
Public Facilities																																					
PF	Public Facilities																																				
Master Planned Development																																					
MPD	Master Planned Development																																				
REC/PD	Recreation/PD																																				

Figure 6 – Example of Modernized Formatting

The current format of the ULDC is difficult to navigate and use. This was a theme mentioned consistently during stakeholder interviews. While some indentation is used to distinguish sub-sections, there could be a stronger use of white space and paragraph alignment to help make a visual distinction between provisions. The document could also make use of chapter headers, referencing systems, and an index, as well as a glossary of abbreviations. The table of contents could be enhanced with greater detail.

To improve readability, modern codes use distinctive heading styles to more clearly distinguish various chapters, sections, subsections, paragraphs, and subparagraphs. When combined with better alignment, white space, tables, and graphics, the text becomes much easier to read and interpret. An excerpt from the City of Flagler Beach Land Development Code update, currently underway, demonstrates this refresh of style.

Additionally, updating how the standards are presented would offer the reader a break from the current monotony of the presentation of information. An example below shows the current standards in the ULDC, and a more up-to-date version of how the information could be presented.

Table 1 – Alachua County Current ULDC Table 403.09.1 – Standards for Multifamily Districts

Table 403.09.1
Standards for Multifamily Districts

Standards	Zoning District		
	R-2	R-2a	R-3
Density Range—Dwelling units per acre	4—8	8—14	14— 24
<i>Setbacks around the perimeter of the development:</i>			
Front, min. (ft)	25	25	25
Rear, min. (ft)	20	20	20
Interior side, min. (ft)	10	10 ¹	10 ¹
Street side, min. (ft)	25	25	25
<i>Building Standards:</i>			

Table 2 – Example of Proposed R-2 District Dimensional Standards

R-2 DISTRICT DIMENSIONAL STANDARDS		
Lot Standards (Minimum)		
A	Density Sq. Ft. Per Dwelling Unit	4-8
Setbacks (Minimum)		Feet
B	Front Yard (Feet)	25
C	Side Yard	10
D	Rear Yard	20
	Street Side, min (Feet)	25
Building Standards		
E	Building height, maximum	35 feet
F	Units Per Building, max ¹	8 units
1. This standard does not apply to assisted living facilities		

The ULDC could be updated to include:

- A detailed table of contents;
- An easy to understand referencing system;
- Detailed headers and footers which highlight the chapter number and topic on each page, allowing a reader to navigate to desired locations;
- Numerous cross-references;
- A robust definitions section to eliminate confusion and the need for interpretations; and
- A glossary of abbreviations.

The updated ULDC will include hyperlinks to cross-reference other chapters and sections of the ULDC. These links will reduce the amount of time a reader will have to spend looking through other sections of the document.

Finally, utilizing a strong hierarchy of articles and sections with a numbering system that is logical will be helpful to the user. The current ULDC is organized into 24 chapters, which are then divided into articles, divisions and sections. Generally, this layout is well-structured.

C. Simplify and Clarify Language

Using clear and precise language in the updated ULDC will create a better user experience. When standards are duplicative, inconsistent, and unclear, it is an open invitation for a variety of interpretations that creates uncertainty for applicants as well as County Staff, Boards, and Elected Officials. A focus on objective and clear standards will allow the users to consistently

apply them across projects throughout the County. All standards, procedures, and other language in the ordinance will be reviewed and where appropriate, modified with standards consistent with the Comprehensive Plan.

D. Graphics, Illustrations, and Flowcharts

While the current ULDC does include illustrations, graphics, flowcharts, and updated tables, the update will include enhanced, and additional such tools. Use of these will also help to eliminate the need for lengthy and repetitive text. The primary users of the ULDC are site planners, designers, landscape architects, and architects. These are highly visual individuals, who generally relate well to pictures and diagrams.

Incorporating more graphics will help to illustrate the intent of the regulations. A list of proposed graphics that might improve a user's experience with the ULDC will be provided to County staff for review throughout the ULDC update process.

i. Graphics and Illustrations

The current ULDC does include graphics and illustrations to convey regulatory concepts. On occasion, text misses an opportunity to visually communicate the desired intention behind various provisions. Increasing the number and type of graphics throughout the ULDC to help illustrate procedures, development form, and other zoning concepts (such as yard definitions, parking space dimensions, parking lot landscaping and other landscaping and screening requirements) would make the regulations more user-friendly. Consideration will also be given to using photographs of Alachua County projects demonstrating both preferred and discouraged development forms and patterns that might make the regulations more easily understandable.

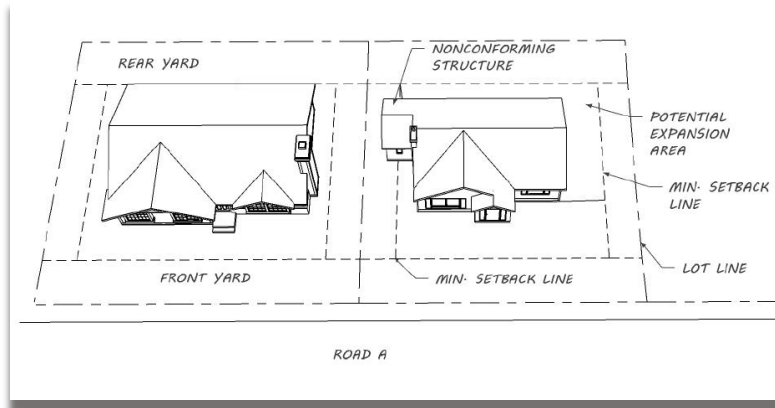


Figure 7 – Example of Illustration

ii. Flowcharts and Tables

Presenting information in flowcharts or tables makes it easier to understand and eliminates repetition and inconsistencies. Flowcharts can be used along with text in the procedures section of the regulations to graphically portray the process required for review of a specific type of development application. This technique allows the user to more easily understand the steps

necessary to go through the development approval processes. While the current ULDC does include procedural flowcharts, they can be modernized to be more attractive to the reader. Examples of a current flowchart in the ULDC and a proposed revised format of the same process is shown below.



Figure 8 – Current ULDC Text Amend. Flowchart



Figure 9 – Proposed ULDC Text Amend. Flowchart

The existing ULDC does use tables, though they are cumbersome and difficult to navigate. Not clearly labeled and lack repeating header rows that would follow across pages when printed. Tables should be consistently formatted throughout the ULDC for readability – use of highlights

for every other row that allows the reader to easily comprehend and follow along through the table would be a helpful addition.

It is also suggested that Article II, Use Table is consolidated as much as practical. All tables should be labeled according to the subsection in which they are located, so they can be referenced elsewhere in the document.

E. Reform the Use Table

One of the most important elements of a land development code is the schedule of uses. The current ULDC, C 404, Article II Use Table is outdated and somewhat challenging to maneuver through. Kimley-Horn suggests an update to this table to present the information in a different way. This update may not only include the format of the table in terms of a legend and headers for pages, but also looking at the mix of uses to determining if the categories could be more broad and flexible thereby making the overall table shorter. Inclusion of uses such as co-housing units, urban agriculture, and sustainable energy production facilities, should be considered. This task would be done following the consolidation, elimination, and additions to the zoning districts, as discussed in Theme 3.B. below. Following the identification of the categories, the definitions section would be updated to reflect the uses shown in the table.

F. Definitions

One of the main keys to a solid land development code is having a strong definitions section. A significant amount time will be spent reviewing current definitions within the ULDC (primarily located in Chapter 410 - DEFINITIONS) to determine their appropriateness, identify terms that are lacking, and reconciling with Florida Statute definitions related to community planning and development. There are also definitions located throughout the document as part of standards. These will all be consolidated into one “Definitions” section. The ULDC definitions will further be aligned with the Future Land Use Element Definitions section of the Comprehensive Plan. All uses in the updated Use Table will be defined in this section, as well. Where existing definitions need to be removed due to being antiquated or irrelevant, they will be deleted from the updated ULDC. Standards or references to specific zoning districts will not be included in the definitions section. Those are more appropriately placed as a use-specific standard for a zoning district(s).

G. Streamline Review Procedures

Consideration was given whether the existing Growth Management procedures needed to be streamlined. Following the stakeholder meeting with the development community, it was determined that no changes were needed. There were few to no concerns raised regarding how the Growth Management Department processes applications. Revisions to review procedures and processes may become apparent and necessary during the development of the proposed updates.

H. Inconsistencies, Duplications, and Usability Issues

Several inconsistencies, duplications, and usability issues were raised during the data collection and stakeholder interview parts of this process. An efficient way to present this information is

through an Amendment Matrix for this project. All comments and suggestions collected to date have been organized and categorized in an Amendment Matrix that provides the basis for the changes that will be proposed. As of the date of this report, 393 comments have been received. The Amendment Matrix is found in the Appendix.

Theme 2: Implement the Comprehensive Plan

A. Introduction

Local government land development codes are required to be consistent with Section 163.3202, Florida Statutes and implement an adopted Comprehensive Plan. Alachua County recently adopted their 2019-2040 Comprehensive Plan, which includes a number of goals, principles, strategies, objectives and policies. The fundamental goals that need to be addressed in the ULDC to implement the Comprehensive Plan are provided in the following table.

Table 3 – Comprehensive Plan Goals

COMPREHENSIVE PLAN GOALS	
Future Land Use Element:	1. Encourage the orderly, harmonious, and judicious use of land consistent with [the following] guiding principles.*
Transportation Mobility Element:	1. Establish a multi-modal transportation system that provides mobility for pedestrians, bicyclists, transit users, motorized-vehicle users, users of rail and aviation facilities, and is sensitive to the cultural and environmental amenities of Alachua County.
Housing Element:	1. To promote safe, sanitary, and affordable housing for all current and future Alachua County residents. 2. To maintain and improve the existing supply of affordable housing, and provide for the redevelopment of neighborhoods. 3. To ensure access to housing opportunities for those residents with specialized housing needs [Alachua County shall implement the following policies].*
Potable Water and Sanitary Sewer Element:	1. To provide adequate, safe, efficient, economical, reliable and environmentally sound system of potable water supply and sanitary sewer collection, treatment and disposal to meet the needs of the current and projected Alachua County population.
Solid Waste Element:	1. To provide clean, efficient, economical, and environmentally-sound management of solid waste in Alachua County.
Stormwater Element:	1. Protect natural drainage features and the quality of waters and protect new and existing developments in accordance with adopted Levels of Service for floodplain management, water quantity, and water quality.
Conservation Element:	1. To conserve, manage, and restore or enhance the natural and human-related resources of Alachua County to ensure long-term environmental quality for the future.
Recreation Element:	

COMPREHENSIVE PLAN GOALS	
1. To provide an integrated recreation and open space system for Alachua County.	
Intergovernmental Coordination Element:	
1. Coordinated and cooperative Comprehensive Planning, land development regulation, and service provision with agencies and governmental units affecting Alachua County.	
Capital Improvements Element:	
1. Provide and maintain, in a timely and efficient manner, adequate public facilities for both existing and future populations, consistent with available financial resources.	
Economic Element:	
1. Promote the economic prosperity of all citizens of Alachua County, address economic equity, and expand and diversify the County's tax base.	
Historic Preservation Element:	
1. Preserve, protect, enhance and support historic resources and properties and paleontological resources within Alachua County.	
Public School Facilities Element:	
1. The County shall collaborate with the School Board of Alachua County (SBAC) to plan for public school capacity to accommodate projected enrollment demand within the five year, ten year, and twenty year planning periods	
2. Provide adequate public school capacity to accommodate enrollment demand within the School Board's Five-Year District Facilities Work Program.	
3. Provide safe and secure public schools sited within well designed communities.	
4. Promote and optimize intergovernmental cooperation for effective future planning of public school system facilities.	
5. Monitoring and evaluation of Public School Facilities Element.	
Healthy Community Element:	
1. Preserve the health of Alachua County residents and promote health in all policies and service initiatives affecting all aspects of the built environment, by facilitating health care delivery, improving the equity and livability of the community, and providing all Alachua County residents opportunities for active living.	
Energy Element:	
1. Reduce greenhouse gas emissions and fossil fuel consumption; mitigate the effects of rising energy costs; and promote the long-term economic security of Alachua County through energy conservation, energy efficiency and renewable energy production.	
<i>* NOTE: Please refer to the Alachua County Comprehensive Plan 2019-2040 for additional details.</i>	

The sections that follow summarize specific plan policies that provide direction for the above goals to be met. The updated ULDC will provide the regulations that will implement the Comprehensive Plan.

Theme 3: Areas of Focus Identified by County Staff

County staff identified seven (7) specific areas of focus to be examined during the preparation of the Best Practices Report. This includes following:

- A. Protecting natural resources;
- B. Collapsing zoning districts to allow for adaptability of structures and uses;
- C. Eliminating parking minimums;
- D. Providing for additional affordable housing through infill development;
- E. Supporting multimodal design and human-scaled development;
- F. Encouraging redevelopment; and
- G. Supporting the agricultural economy.

The following represents findings and recommendations for these topics.

A. Protecting Natural Resources

Alachua County has extensive and detailed natural resource protection measures in their Land Development Code. A majority of the input received about natural resources revolved around tree protection and the most frequently cited issues are discussed below.

i. Tree Moving Versus Tree Removal

Currently, the tree protection scheme in Alachua County, in both the Comprehensive Plan and the Unified Land Development Code, follows the hierarchy of: 1) Retain, 2) Relocate, 3) Replant, and 4) Mitigate via payment. Arborists do not recommend transplanting very large trees and success rates are quite low. The default solution often becomes replanting. There are a number of possible changes which could make this situation better, and some of them may require a Comprehensive Plan text amendment, these include:

1. Change the applicability of the replant standard to apply only to smaller specimen trees that have a better chance of surviving the trauma of transplanting.
2. Add the standard that long-lived heritage trees cannot be removed as part of the development design process, unless otherwise approved by the County.
3. Remove the relocation option from the hierarchy of tree protection options. This would necessitate a change to the Comprehensive Plan.
4. Provide that at the discretion of the County Forester/Landscaping Inspector mitigation for the removal of native heritage trees shall be with preferred native tree species appropriate for the historic or current site conditions.

ii. Site work within undisturbed tree/canopy areas

Currently the ULDC limits disturbance of the ground cover in undisturbed tree/canopy preservation areas to “shallow discing” to a depth of no greater than 2 inches unless specifically approved otherwise by the County Forester/Landscaping Inspector. This practice allows for potential root damage by right. The County should consider a prohibition of all landscape

preparation in the undisturbed areas unless specifically approved otherwise by the County Forester/Landscaping Inspector.

iii. Tree Canopy Calculation and Location

As a standard practice the County considers canopy coverage calculation to end at the property line and canopy passing off property is not be counted in initial canopy and canopy hanging over the property from adjoining property is counted as initial canopy for the subject property. This practice needs to be codified in the ULDC.

Likewise, it has been standard practice that planted pine silviculture canopy does not count as original existing canopy but may be counted towards future canopy (especially if it is long leaf pine) as long as it can be considered a part of the best quality canopy on a site. This practice needs to be codified in the ULDC.

While current ULDC language requires the submittal of an aerial with the permit package it does not require the development plan to be overlain on it. By requiring this, tree canopy calculations will be more accurate and more reflective of need for clearing for the development. Also, where canopy measurement can be made from the aerials tree canopy should not be made by estimates made by tree diameter calculations. The County should consider making these changes.

iv. Tree Canopy Preservation in Transit Oriented Development (TOD), Traditional Neighborhood Development (TND) and Cottage Neighborhood (CN) Developments

The County's ULDC requires that a minimum five (5) percent of the tree canopy be retained for Transit Oriented Developments, Traditional Neighborhood Developments and Cottage Neighborhoods. However, there are no qualitative standards guiding which 5 percent is to be retained. As a result, the County is often left with inferior canopy protection in these cases. The County should consider adding qualitative standards for canopy protection for TOD, TND and CN developments.

v. Conform to Recent State Legislation

As part of this update, changes to state law need to be considered and incorporated where appropriate. Changes made in 2019 to trees and tree protection are discussed more fully below.

In 2019 the Florida Legislature passed Chapter 2019-155, Laws of Florida amending Chapter 163, Florida Statutes preempting, in part, local government home rule with regards to regulating tree pruning, trimming or removal on residential property. Specifically, new Section 163.045, Florida Statutes prohibits local governments from requiring "notice, application, approval, permit, fee, or mitigation for the pruning, trimming or removal of a tree on residential property if the property owner obtains documentation from an arborist... or licensed landscape architect that the tree presents a danger to persons or property". This legislation prohibits a local government from requiring replanting in these circumstances. Alachua County's ULDC is not consistent with this new law.

Chapter 2019-155, Laws of Florida also modified Section 163.3209 regarding electric transmission and distribution line right-of-way maintenance. This section prohibits local governments from "require[ing] or apply[ing] any permits or other approvals or code provisions for or related to vegetation maintenance and tree pruning or trimming within the established right-of-way". However, prior to such routine maintenance "the utility shall provide the local government 5 business days advance notice. Such advance notice is not required for...work to restore electrical service, or to avoid imminent vegetation-caused outage or when performed at the request of a property owner adjacent to the right-of-way. Upon the request of the local government the electric utility shall meet with the local government to discuss and submit the utilities vegetative maintenance plan... ." "This section does not supersede local government ordinances or regulations governing the planting, pruning, trimming, or removal of specimen trees or historic trees or trees in designated canopied protection areas. This section shall not apply to local governments who, in conjunction with the utility, have developed a vegetative management plan for utility rights-of-way." The County's ULDC does not incorporate these provisions and should be updated to reflect these changes in State Law.

vi. Other Potential Changes

Information and comments gathered during the ULDC update process to date in the area of natural resource protection are extensive and varied. The issues above were the most common cited by many stakeholders. Below are several narrower and less cited issues that should be examined closely in the next phase of this update.

- Enhanced protection of long living specimen trees.
- Requirements for screening (usually fences) and then added requirement for landscaping outside the fence in what becomes no-man's land.
- Changes in buffering requirements to Outstanding Florida Waters.
- Updating and coordinating tree species lists with Gainesville Regional Utilities.
- Septic tank performance standards.

Most of the other issues identified are technical/scrivener in nature and will be dealt with in the next phase but not listed here. All input received to date can be found in the Amendment Matrix in Appendix A.

vii. National Best Practices

Texas A&M University has identified numerous best practices for tree protection. Among them are identification of Critical Root Zones and Tree Protection Zones. These concepts are inherent in the ULDC but are not clearly spelled out nor accompanied by graphical representations. The County should consider adopting these specific concepts and provide graphical representations such as below:

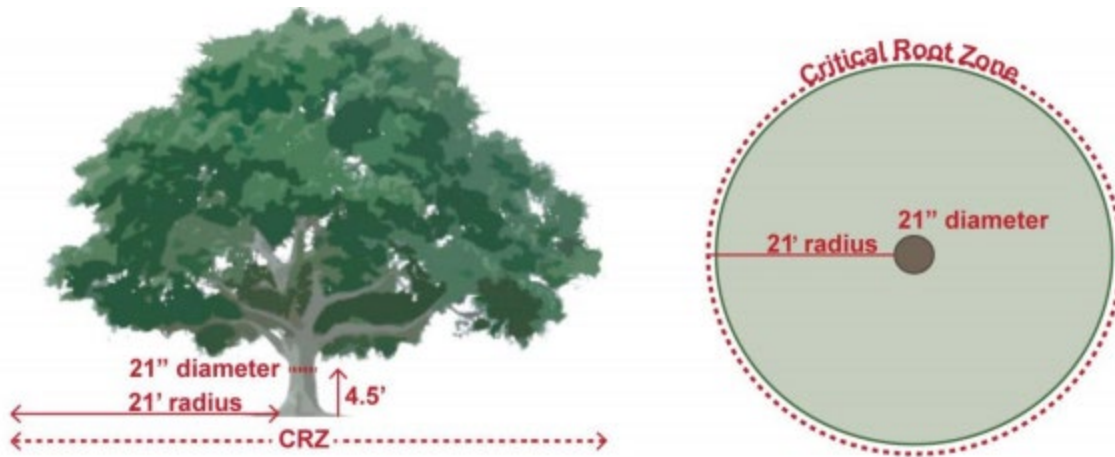


Figure 10 - Texas A&M Forest Service, Best Management Practices for Tree Protection. undated

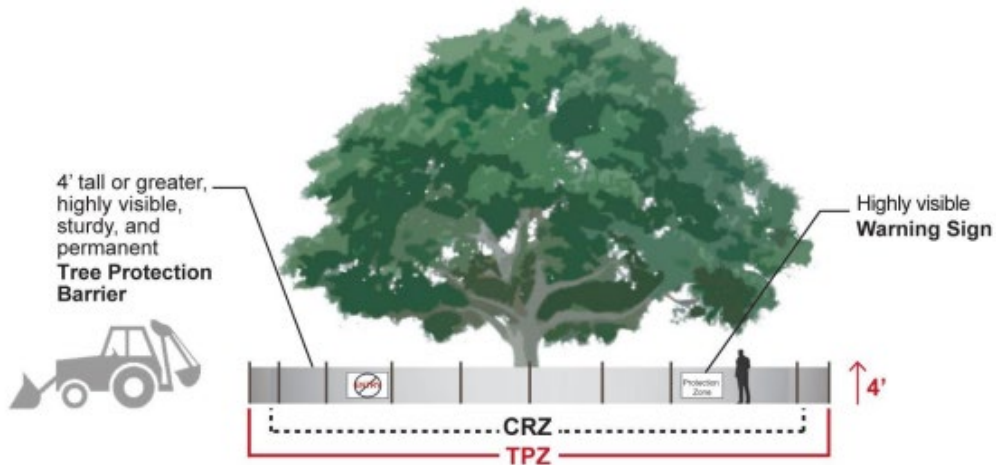


Figure 11 - Texas A&M Forest Service, Best Management Practices for Tree Protection. undated

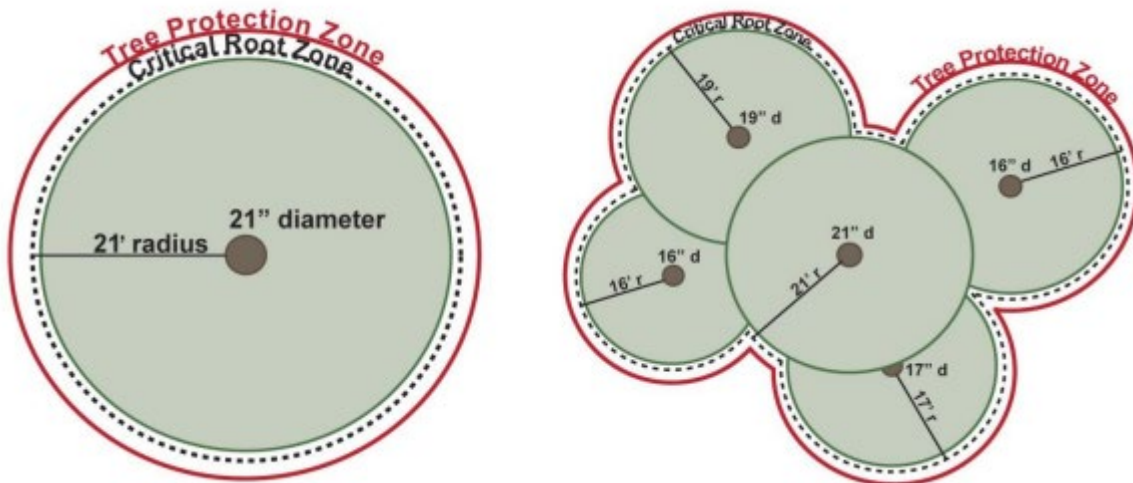


Figure 12 - Texas A&M Forest Service, Best Management Practices for Tree Protection. undated

Collapsing Zoning Districts or Standards to Allow for Adaptability of Structures and Uses

Alachua County has thirty-one (31) zoning districts and sub-districts. This provides for a very fine level of granularity that, in some cases, provides only a slight variation in densities and intensities between districts. Such a structure tends to be confusing to the regulated public but also can stifle flexibility by Alachua County. Below is an examination of the land uses and their zoning districts and sub-districts found in the Alachua County ULDC and their compatibility with the new Comprehensive Plan. Below are a series of recommendations to collapse certain zoning districts. By doing this, the County would be required to do a countywide administrative rezoning. This is a technical, non-substantive rezoning effort that is not uncommon in the planning realm. This rezoning would transition many properties in the County to new zoning districts that would be the most similar to their existing zoning districts. The most affected zoning districts proposed in this Report, would be the residential zoning districts. These changes are being proposed in an effort to simplify and reduce the number of zoning districts within the County.

An alternative zoning district realignment and in order to avoid countywide administrative rezoning, would be to collapse some zoning standards, such as density.

i. Use, Existing Land Use Category, and Existing Zoning District Assessment

Table 4 – Existing Land Use and Zoning Districts

EXISTING LAND USE AND ZONING DISTRICTS		
USE	LAND USE CATEGORY	ZONING DISTRICT
Rural/Agricultural	Rural/Agricultural	A Agriculture AG-TDR Agricultural (with Transfer of Development Rights) C-TDR Conservation (with Transfer of Development Rights)
	Rural Commercial-Agriculture	A-RB Agricultural Rural Business
Residential	Estate Residential	RE Single family, Estate Residential – 1du/2acres
	Low Density Residential	RE-1 Single family, Low Density – 2du/acre
		R1aa Single family, Low Density – 3du/acre
		R1a Single family, Low Density – 4du/acre
		R1c Single family, Low Density 4/du/acre

EXISTING LAND USE AND ZONING DISTRICTS			
USE	LAND USE CATEGORY	ZONING DISTRICT	
	Medium Density Residential	R1b	Single family, Medium Density – 8du/acre
		R2	Multiple family, Medium Density – 8du/acre
	Medium High Residential	R2a	Multiple family, Medium-High Density – 16du/acre
	High Density Residential	R3	Multiple family, High Density – 24du/acre
Commercial	Commercial Commercial Enclaves	AP	Administrative/Professional
		BP	Business and Professional
		BR	Business, Retail
		BR-1	Business, Tourist and Entertainment
		BH	Business, Highway
		BA	Business, Automotive
		BA-1	Business, Automotive
		MB	Business, Marine District
Industrial	Light Industrial	BW	Wholesale/Warehousing
		ML	Light Industrial
	Heavy Industrial	MS	Industrial Services and Manufacturing
		MP	Industrial Services and Manufacturing
Institutional	Institutional	--*	--*
Special Purpose Uses	Planned Development District, Rural Employment Centers, Rural Community Employment Centers	PD	Planned Development District
	Manufactured-Mobile Home Park District	RM	Manufactured-Mobile Home Park District
	Recreational Vehicle and Campgrounds District	RM-1	Recreational Vehicle and Campgrounds District
	Residential Professional District	RP	Residential Professional District

EXISTING LAND USE AND ZONING DISTRICTS			
USE	LAND USE CATEGORY	ZONING DISTRICT	
	Hospital/Medical District	HM	Hospital/Medical District
	Conservation District	C-1	Conservation District
	Preservation District	P	Preservation District

* Institution is not currently shown as a Zoning District in the ULDC.

1. Rural/Agricultural Districts

The following Rural/Agricultural districts currently exist within the ULDC:

A Agriculture

AG-TDR Agricultural (with Transfer of Development Rights)

C- TDR Conservation (with Transfer of Development Rights)

A-RB Agricultural Rural Business

The rural/agricultural districts in the Land Development Code implement discreet land uses and policies contained in the Comprehensive Plan and no changes are recommended.

Proposed New District
Existing District Proposed to be Deleted

PROPOSED LAND USE AND ZONING DISTRICTS			
USE	LAND USE CATEGORY	ZONING DISTRICT	
Rural/Agricultural	Rural/Agricultural	A	Agriculture
		AG-TDR	Agricultural (with Transfer of Development Rights)
		C- TDR	Conservation (with Transfer of Development Rights)
	Rural Commercial-Agriculture	A-RB	Agricultural Rural Business

2. Residential Districts

There are five separate zoning districts for low density residential implementing the Comprehensive Plan policy for low density residential of a maximum of 4 dwelling units per acre.

RE Single family, Estate Residential (1 du/2 acres)

RE-1 Single family, Low Density (2 du/acre)

R-1aa Single family, Low Density 3 du/acre)

R-1a Single family, Low Density (4 du/acre)

R-1c Single family, Low Density (4 du/acre)

As can be seen in the table above, the differences in density vary generally by only 1 dwelling unit and in one case there is no difference in density at all. Alachua County should consider collapsing the single-family low-density zoning districts, except for R-1c which is the only zoning district that allows for mobile homes. It is suggested that the R-1c District be renamed to LDR1 to be consistent with the rest of the Low Density Residential recommended nomenclature.

There are currently four medium and high density residential Zoning Districts listed in the ULDC:

R-1b Single family, Medium Density (8 du/acre)

R-2 Multiple family, Medium Density (8 du/acre)

R-2a Multiple family, Medium-High Density (14 du/acre)

R-3 Multiple family, High Density (24 du/acre)

A realignment of the multi-family zoning districts by eliminating the R-2 category may help to simplify the ULDC. However, these Zoning Districts follow land use categories and densities found in the Comprehensive Plan, therefore it is recommended that these zoning districts remain as is. It is suggested though, that the acronyms for the Medium, Medium High, and High Density districts be changed to MDR, MHDR, and HDR respectively to match the Zoning District names.

Proposed New District
Existing District Proposed to be Deleted

PROPOSED LAND USE AND ZONING DISTRICTS			
USE	LAND USE CATEGORY	ZONING DISTRICT	
Residential	Estate Residential	RE	Single family, Estate Residential – 1du/2acres
	Low Density Residential	LDR	Low Density Residential 1-4 du/acre
		RE-1	Single family, Low Density – 2du/acre
		R-1a	Single family, Low Density – 3du/acre
		R-1a	Single family, Low Density – 4du/acre
		R-1c LDR1	Single family, Low Density Residential 4/du/acre

PROPOSED LAND USE AND ZONING DISTRICTS				
USE	LAND USE CATEGORY	ZONING DISTRICT		
	Medium Density Residential	R-1b	<u>MDR1</u>	Single family, Medium Density Residential – 8du/acre
		R-2	<u>MDR2</u>	Multiple family, Medium Density Residential – 8du/acre
	Medium High Density Residential	R-2a	<u>MHDR</u>	Multiple family, Medium-High Density Residential – 16du/acre
	High Density Residential	R-3	<u>HDR</u>	Multiple family, High Density Residential – 24du/acre

3. Commercial Districts

There are eight (8) commercial zoning districts in the Land Development Code and while they generally implement various policies found in the Comprehensive Plan none of them are specifically cited in the Comprehensive Plan, with perhaps the exception of Highway Business.

- AP Administrative/Professional
- BP Business and Professional
- BR Business, Retail
- BR-1 Business, Tourist and Entertainment
- BH Business, Highway
- BA Business, Automotive
- BA-1 Business, Automotive
- MB Business Marine District

The two Business Automotive Zoning Districts (BA and BA-1) have identical lot dimensions, setbacks, building standards and identical allowed uses and could be considered for merger.

Similarly, Administrative/Professional (AP) and Business and Professional (BP) share similar dimensional characteristics with BP being allowed 45 feet in height while AP is restricted to 35 feet. These two districts share similar allowed uses with BP allowing the following uses not allowed in AP: nursing home, funeral home, educational facility, massage therapy, dance/art studio, gym, and bank.

Accordingly, the AP and BP districts could reasonably be considered for merger.

Finally, the differences between Business, Retail (BR) and Business, Tourist and Entertainment (BR-1) are very minor but each relates to specific land use categories in the Comprehensive Plan and there is no recommendation for merger.

Proposed New District
Existing District Proposed to be Deleted

PROPOSED LAND USE AND ZONING DISTRICTS		
USE	LAND USE CATEGORY	ZONING DISTRICT
Commercial	Commercial Commercial Enclaves	ABP Administrative/Business/Professional
		BP Business and Professional
		AP Administrative/Professional
		BR Business, Retail
		BR-1 Business, Tourist and Entertainment
		BH Business, Highway
		BA Business, Automotive
		BA-1 Business, Automotive
		MB Business, Marine District

4. Industrial Districts

The ULDC currently has the following four Industrial zoning districts:

- BW Wholesale/Warehousing
- ML Light Industrial
- MS Industrial Services and Manufacturing
- MP Industrial Services and Manufacturing

Typically, Wholesale/Warehousing (BW) and Light Industrial (ML) uses are complementary and are often found in proximity to each other or are co-located. Dimensional standards for these two districts are similar with ML being allowed 60 feet in height while BW is restricted to 40 feet. Allowed uses are similar with limited retail type uses being allowed in BW and wholesale and warehousing being a specific permitted use in ML. The County should consider merging these two zoning districts.

Likewise, both Industrial Services (MS) and Manufacturing Districts (MP) have identical dimensional standards and identical allowed uses. The County should consider combining these districts into a Heavy Industrial (HI) District.

Proposed New District
Existing District Proposed to be Deleted

PROPOSED LAND USE AND ZONING DISTRICTS			
USE	LAND USE CATEGORY	ZONING DISTRICT	
Industrial	Light Industrial	LI	Light Industrial
		BW	Wholesale/Warehousing
		ML	Light Industrial
	Heavy Industrial	HI	Heavy Industrial
		MS	Industrial Services and Manufacturing
		MP	Industrial Services and Manufacturing

5. Institutional District

The County should consider developing an Institutional Zoning District. The Institutional use is identified in the Future Land Use Element of the Comprehensive Plan as a Land Use. It also appears on the legend of the Future Land Use Map as a Land Use. However, there is no associated Zoning District in the ULDC.

The Comprehensive Plan lists the following uses as appropriate for the Institutional Land Use category:

- Public and Private Educational Facilities (meeting the State of Florida compulsory education requirements), Day Care Centers and Nursery Schools.
- Community Services (e.g. civic and government facilities, fire and emergency services, law enforcement, health facilities, community service organizations, correctional facilities).
- Public Utility, Communication or Infrastructure Services (e.g. utility transmission and distribution facilities, landfills).
- Religious Facilities; and
- Cemeteries

Proposed New District
Existing District Proposed to be Deleted

PROPOSED LAND USE AND ZONING DISTRICTS			
USE	LAND USE CATEGORY	ZONING DISTRICT	
Institution	Institution	I	Institution

6. Special Purpose Districts

Special Purpose Zoning Districts include typical categories of Manufactured-Mobile Home Park District, Conservation District, Residential Professional District and Preservation District as well as atypical districts unique to Alachua County. These include Planned Development District, Recreational Vehicle and Campground District and Hospital/Medical District. The ULDC Special Purpose Districts currently include:

PD	Planned Development District
RM	Manufactured-Mobile Home Park District
RM-1	Recreational Vehicle and Campgrounds District
RP	Residential Professional District
HM	Hospital/Medical District
C-1	Conservation District
P	Preservation District

Based on the analysis of these districts, they are of limited distribution and no changes are recommended.

Proposed New District
Existing District Proposed to be Deleted

PROPOSED LAND USE AND ZONING DISTRICTS			
USE	LAND USE CATEGORY	ZONING DISTRICT	
Special Purpose Uses	Planned Development District, Rural Employment Centers, Rural Community Employment Centers	PD	Planned Development District
	Manufactured-Mobile Home Park District	RM	Manufactured-Mobile Home Park District
	Recreational Vehicle and Campgrounds District	RM-1	Recreational Vehicle and Campgrounds District
	Residential Professional District	RP	Residential Professional District
	Hospital/Medical District	HM	Hospital/Medical District
	Conservation District	C-1	Conservation District
	Preservation District	P	Preservation District

ii. Comprehensive Plan Land Use Classifications/ ULDC Zoning District Relationships
In order to facilitate an easy understanding of the relationship of the Land Use Categories found in the Comprehensive Plan and the Zoning Districts and to emphasize the relationship between those two documents the County may wish to consider a table similar to the one below:

Proposed New District
Existing District Proposed to be Deleted

PROPOSED LAND USE AND ZONING DISTRICTS			
USE	LAND USE CATEGORY	ZONING DISTRICT	
Rural/Agricultural	Rural/Agricultural	A	Agriculture
		AG-TDR	Agricultural (with Transfer of Development Rights)
		C- TDR	Conservation (with Transfer of Development Rights)
	Rural Commercial-Agriculture	A-RB	Agricultural Rural Business
Residential	Estate Residential	RE	Single family, Estate Residential – 1du/2acres
	Low Density Residential	LDR	Low Density Residential 1-4 du/acre
		RE-1	Single family, Low Density – 2du/acre
		R1aa	Single family, Low Density – 3du/acre
		R1a	Single family, Low Density – 4du/acre
		R1c	Single family, Low Density Residential 4/du/acre
	Medium Density Residential	R1b	Single family, Medium Density Residential – 8du/acre
		R2	Multiple family, Medium Density Residential – 8du/acre
	Medium High Density Residential	R2a	Multiple family, Medium-High Density Residential – 16du/acre
		MHD R	Multiple family, Medium-High Density Residential – 16du/acre

PROPOSED LAND USE AND ZONING DISTRICTS				
USE	LAND USE CATEGORY	ZONING DISTRICT		
	High Density Residential	R3	HDR	Multiple family, High Density Residential – 24du/acre
Commercial	Commercial Commercial Enclaves	ABP	Administrative/Business/Professional	
		AP	Administrative/Professional	
		BP	Business and Professional	
		BR	Business, Retail	
		BR-1	Business, Tourist and Entertainment	
		BH	Business, Highway	
		BA	Business, Automotive	
		BA-1	Business, Automotive	
		MB	Business, Marine District	
Industrial	Light Industrial	LI	Light Industrial	
		BW	Wholesale/Warehousing	
		ML	Light Industrial	
	Heavy Industrial	HI	Heavy Industrial	
		MS	Industrial Services and Manufacturing	
		MP	Industrial Services and Manufacturing	
Institution	Institution	I	Institution	
Special Purpose Uses	Planned Development District, Rural Employment Centers, Rural Community Employment Centers	PD	Planned Development District	
	Manufactured-Mobile Home Park District	RM	Manufactured-Mobile Home Park District	
	Recreational Vehicle and Campgrounds District	RM-1	Recreational Vehicle and Campgrounds District	

PROPOSED LAND USE AND ZONING DISTRICTS			
USE	LAND USE CATEGORY	ZONING DISTRICT	
	Residential Professional District	RP	Residential Professional District
	Hospital/Medical District	HM	Hospital/Medical District
	Conservation District	C-1	Conservation District
	Preservation District	P	Preservation District

B. Eliminating Parking Minimums

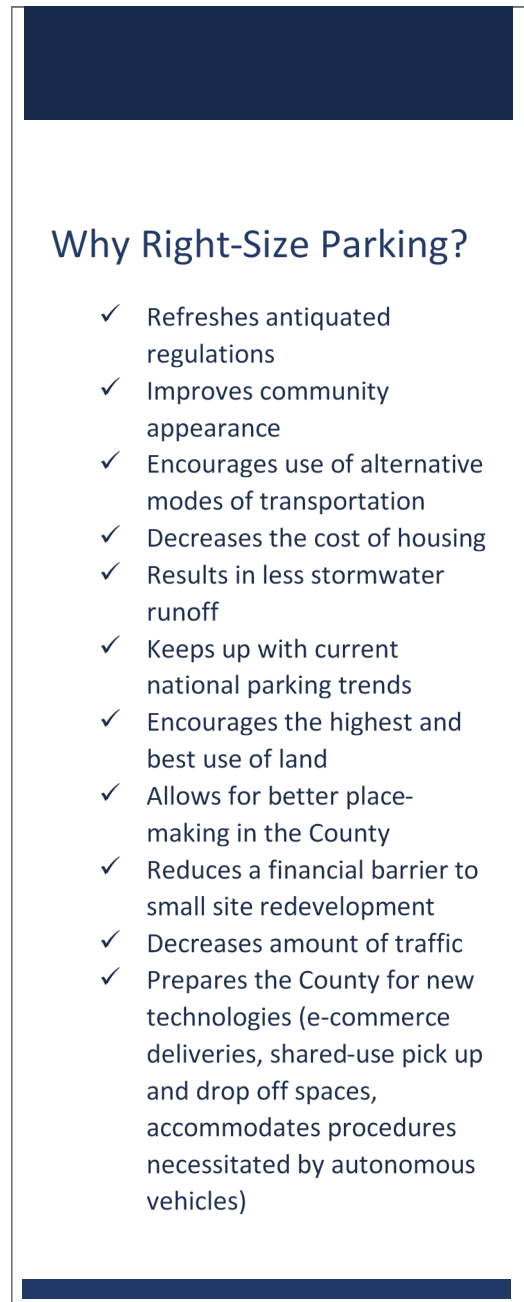


Figure 13 - Why Right-Size Parking?

Solving the issues related to parking within a community has long been discussed throughout the country. The invention of the automobile, coupled with the move to the suburbs, led to auto-dependency. Parking management became a real issue and planning departments bought in on the concept of regulating the amount of parking estimated for peak use of a space. There does not appear to be a “one size fits all” remedy, as each community has its own unique issues and overall objectives for how they want their community to look. Parking is often underutilized,

resulting in parking lots that sit empty much of the year. It is also expensive. The cost of construction for surface and/or parking garage parking spaces, coupled with the annual maintenance and taxes associated with those spaces, drives up the cost of the residential or nonresidential space it is serving. Those costs get pushed onto the user of the space. Sometimes that user is a small business who simply can't afford the cost of providing parking for its patrons and becomes discouraged from starting the business. Other times, it causes housing options to be unaffordable. Additionally, there is the consideration of opportunity lost by not using the property used as parking lots for its highest and best use.

Alachua County has been working to find the right solution for its parking needs. The current Alachua County ULDC contains provisions regarding remote parking (Section 404.82.3), shared parking (Section 407.17), and parking reductions or increases (Section 407.18). Having these options provides creative ways to find the necessary ratio of parking.

In reviewing the background documents, including the Comprehensive Plan and Land Development Code, the following analyses and recommendations can be made.

i. Eliminating Parking Minimums:

Required parking minimums in land development codes are arbitrary, at best. There is a movement throughout the country of communities considering eliminating their minimum parking requirements and allowing market demand drive how many parking spaces are needed for a given use.

Benefits for Eliminating Parking Minimums

- Potential to increase public transit ridership, walking, and bicycle use
- Provides an opportunity for more affordable housing options
- Reduces rents because developers do not have to provide the parking lot infrastructure or maintain upkeep
- Allows land to be used for higher value uses and/or other purposes
- Lends itself to redevelopment in areas that may have space for buildings but not the additional parking requirements that come along with the proposed use
- Supports Transportation Network Companies by reducing the number of available parking spaces

NATIONAL EXAMPLES:

Buffalo, New York: In 2017, Buffalo made a bold decision to adopt the Buffalo Green Code, moving from a traditional use-based code to a form-based code and essentially removed all parking requirements. Section 8.3.1A. of the Buffalo greencode Unified Development Ordinance states:

***"Off-Street Parking.** There are no provisions that establish a minimum number of off-street parking spaces for*

development. However, certain development proposals are required to complete a transportation demand management plan, [per Section 8.4], which can result in the provision of off-street parking. Where provided, off-street vehicle parking must comply with the standards of this section.”

Mountain View, California: Mountain View saw conventional parking standards as leading to congestion.

Fayetteville, Arkansas: In 2015, all minimum parking requirements for nonresidential properties in Fayetteville were eliminated.

Spartanburg, South Carolina: Eliminated parking standards in 2007, resulting in a renewed focus on pedestrians and away from cars and redevelopment because the barrier of required off-street parking was removed.

ii. Decoupling (Unbundling) Parking from Residential and/or Non-Residential Uses

One technique being used throughout the nation is that of decoupling or unbundling parking from residential uses. The idea behind the concept is that not every resident wants or needs a parking space. The parking space is built and the costs are passed onto the renter or owner of the unit whether they want use of a parking space or not. The County Commission adopted several policies related to this in the recent update of the Comprehensive Plan. Policies in the Comprehensive Plan that support these concepts follow.

Traditional Neighborhood Developments

Policy 1.6.8.(a): *“Innovative solutions to reduce parking requirements, decoupling parking from residential uses, provision of shared parking to serve multiple uses and alternative paving materials are allowed. Parking maximums and innovative solutions to address parking shall be established in the Land Development Regulations. Reduced landscaped requirements may be allowed for off-street parking provided interior to blocks.”*

Celebration Pointe Transit Oriented Development

Policy 1.9.3(e): *“Innovative solutions to reduce parking requirements, decoupling parking from residential uses, provision of shared parking to serve multiple uses and alternative paving materials are allowed. No off-street surface parking is required for any use. Off-street parking may be shared and pooled between uses throughout the development.”*

Urban Activity Center Policies

Policy 2.1.10(c): *“Parking standards which establish maximum limits on parking for various land uses, and include opportunities for shared parking arrangements where adjacent land uses within a mixed use area have different peak usage hours.”*

Policy 2.2.1(a)(2)(g)1.i.: *“Innovative solutions to reduce parking requirements, decoupling parking from residential uses, provision of shared parking to serve multiple uses and alternative paving materials are allowed. Reduced landscaped requirements may be allowed for off-street parking provided interior to blocks.*

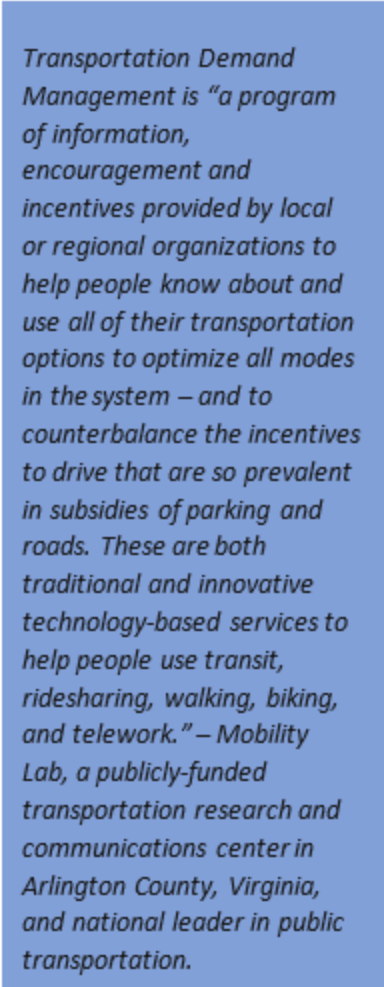
NATIONAL EXAMPLES:

Mountain View, California: Mountain View decoupled (or unbundled) parking requirements from residential uses, as well as commercial leases. They have placed their focus on shared parking and on pricing parking.

Arlington County, Virginia: Arlington County decoupled their parking in 2017 and implemented a TDM plan.



TRANSPORTATION DEMAND MANAGEMENT



Transportation Demand Management is “a program of information, encouragement and incentives provided by local or regional organizations to help people know about and use all of their transportation options to optimize all modes in the system – and to counterbalance the incentives to drive that are so prevalent in subsidies of parking and roads. These are both traditional and innovative technology-based services to help people use transit, ridesharing, walking, biking, and telework.” – Mobility Lab, a publicly-funded transportation research and communications center in Arlington County, Virginia, and national leader in public transportation.

Figure 14 - Transportation Demand

iii. Transportation Demand Management

The County Commission may consider a countywide Transportation Demand Management plan. A countywide TDM plan or policy may be useful to provide clear policy directives in other areas with constrained parking or anticipated development. While the ULDC already promotes increased density as well as transit-oriented and mixed-use development and shared parking, other ULDC updates could include revising parking requirements to include TDM and traffic mitigation requirements, coupled with parking maximums, and unbundled parking where appropriate.

The U.S. Department of Transportation, Federal Highway Administration (FHWA) also advocates for the use of TDMs. In the August 2012 publication of “**INTEGRATING DEMAND MANAGEMENT INTO THE TRANSPORTATION PLANNING PROCESS: A DESK REFERENCE**,” the FHWA provides suggestions regarding where and how TDM can be integrated into the planning process at the local level. Adding mitigation requirements for new developments, or including TDM as part of the development review process, should be considered as part of the ULDC update. The goal is to shift the behavior of drivers to place an emphasis on other modes of travel rather than simply the single occupancy vehicle.

TDM would also serve to support the policies of the Energy Element in the Comprehensive Plan, specifically those related to Objective 4.2. This Objective states “Reduce vehicle miles of travel and increase non-automobile mode share in accordance with the policies of the Transportation Mobility Element.” Further, Objective 4.3 states “Encourage alternative transportation options not dependent on fossil fuels.”

Alachua County is part of the Metropolitan Transportation Planning Organization for the Gainesville Urbanized Area (MTPO). The MTPO should be a key partner with the County in the establishment of TDM. The MTPO is currently undergoing an update to its long-range transportation plan (2045 Gainesville Metropolitan Area Long-Range Transportation Plan) which will be an opportune time to jointly coordinate with them regarding TDM. Outreach and coordination with the MTPO planning staff and team conducting the update will continue during the ULDC update.

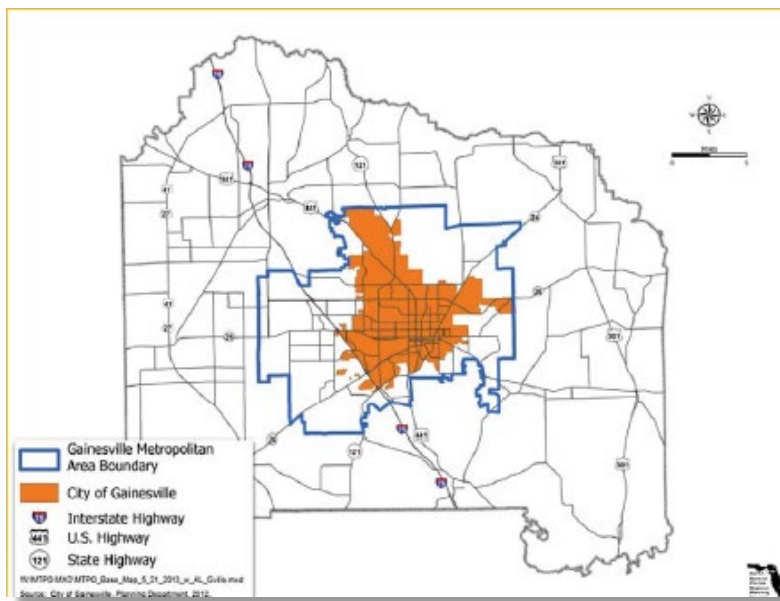


Figure 15 - Gainesville Metropolitan Area Boundary

C. Providing for Additional Affordable Housing Through Infill Development

i. Lack of Appropriate Zoning Tools Limits Housing Choices

Zoning districts that encourage high-quality, small footprint, one- to two-story, medium- to high-density housing types, like those which exist throughout Austin's walkable urban neighborhoods, are almost completely missing from the ULDC. Aside from a few tools that have been recently added in an attempt to address this, the overall system does not address or regulate for this important range of housing types—types that can provide diverse, affordable housing choices.

In the absence of conditional overlays, the entire range of MF zoning districts, based on their site development standards, are completely ineffective in regulating or encouraging this compatible scale of infill.

ii. Missing Middle Options and Design Tools

Across the United States, communities are experiencing a phenomenon referred to as “the Missing Middle.” The Missing Middle refers to dwelling types that are seemingly non-existent in residential development patterns. The types of units are typically dwelling units of medium-density with a small building footprint. Examples include apartments, duplexes and fourplexes.

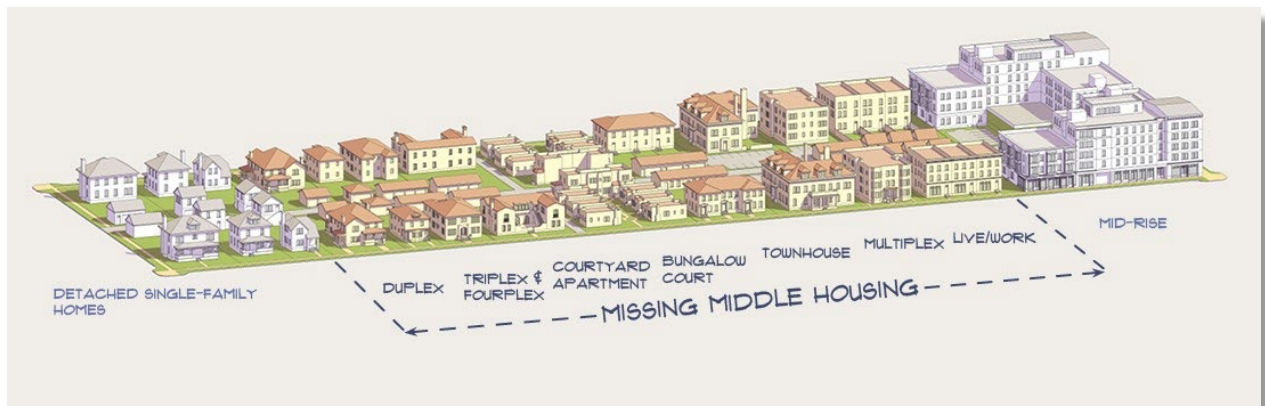


Figure 16 – Diagram of Missing Middle Housing Types. Source: Opticos Design, Inc.

The County Commission could consider providing incentives to encourage this type of housing that is currently lacking throughout the County. Recommendations could be made as to where this type of housing would be appropriate. The primary focus for consideration would be to encourage additional units where this range of housing types exist already, within or adjacent to single-family neighborhoods, and to remove barriers to allow these housing types to be developed within multi-family zoning districts. It will be the ultimate intent to ensure a compatible form while providing a greater diversity of housing choices at a broad range of price levels.

One consideration to help address the issue of lack of affordable housing is to supplement the regulations related to cottage homes, as seen in the 88th Street Cottages subdivision currently under construction adjacent to Longleaf off of Archer Road. Urban Homes, Secondary

Apartments and Small Lot Amnesty are concepts that could be considered by the County Commission to encourage these types of Missing Middle housing. However, these zoning tools only provide for a few types, rather than the full range of housing types at this scale. Form based codes were found to be the most effective way to encourage/regulate the missing middle in other jurisdictions. The application of a form based code need not cover the entire jurisdiction but may be applied to targeted areas and neighborhoods.



Figure 17 - Example of Multiplexes

“The City of Cincinnati adopted its comprehensive land use plan, Plan Cincinnati, in 2012. The plan identified walkable “centers of activity,” including the downtown and 10 urban neighborhoods, which are governed by a form-based code adopted in 2013. The remainder of the city is governed by a conventional zoning code. Cincinnati’s form-based code allows for a variety of housing types (e.g., cottage courts, duplexes and small multi-plexes) in predominantly single family neighborhoods, while preventing larger-scale multifamily structures of the same densities from being built in those locations. The form-based code sets forth a comprehensive, citywide approach to building footprint, mass and scale based on transect.”

“In 2015, the consolidated city-county government of Nashville and Davidson County adopted a comprehensive land use plan, NashvilleNext, implemented by a combination of conventional zoning districts and form-based urban design overlays tailored to specific neighborhoods and districts. The plan recognizes Missing Middle housing by name, and has been successful in encouraging it, particularly in areas governed by the urban design overlays. These form-based codes provide standards for diverse housing types such as rowhouses, stacked flats, and courtyard cottages. Transect-based policy allows sufficient densities by supporting rezonings that accommodate these housing types but constrains building size and scale to prevent the construction of larger multifamily buildings in predominantly single family neighborhoods.”

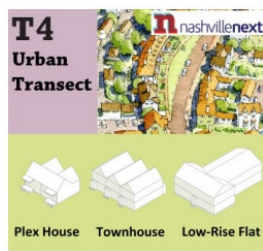


Figure 18 - T4 Urban Transect

There is no guarantee that builders will choose to apply these tools. That will depend on whether or not they are able to respond to the growing market demand for housing in walkable urban places, and if they can provide a range of housing choices or different affordable options in locations where it would be appropriate.

The update to the ULDC could include regulations that allow these types of design options in a wide range of zoning districts either through the application of form based principles or some other mechanism.

E. Supporting Multimodal Design and Human-Scaled Development

Supporting multimodal design and human-scaled development was a fifth area of focus identified by staff. Paring good street networks to move vehicles and pedestrians can be a challenge, especially at the County scale. It can be difficult to merge the rural street network with the urban interface. To be attractive to pedestrians, the network needs to be at a human-scale. To efficiently and effectively move vehicles, the network often loses its attractiveness. Smaller blocks are preferred by pedestrians; larger blocks with fewer access points are frequently a preferred option for those in or on vehicles.

Reviewing and reconciling the street network standards currently specified in Articles VII – Traditional Neighborhood and Transit Oriented Developments and Article XIII – Access Management and Street Network Standards will be a significant task associated with the proposed text amendments. The Alachua County Corridor Design Manual of November 2002 should also be part of this review and analysis. Understanding that differences in street network standards can lead to confusion by the public and County Staff alike, this part of the ULDC update will require a great deal of attention. Due to the complexities and sensitivities associated with street network planning and design, it may be that the Commission desires to have this area of focus workshopped further as a stand-alone issue.



Figure 19 - Alachua County Corridor Design Manual

F. Encouraging Redevelopment

i. Existing Approach

Redevelopment of existing developed areas that are blighted, that are of a use no longer compatible with the surrounding areas, that are an aggregation of smaller parcels or that are not fully contributing to the fabric of Alachua County should be encouraged. Redevelopment maximizes the use of existing infrastructure, reduces vehicle miles traveled, eliminates eyesores, reduces urban sprawl and contributes to the enhancement of nearby property values.

Redevelopment is specifically dealt with in Article XV of the Land Development Code although it is referenced throughout the rest of the Code. The current Code provides the opportunity for relief from certain standards such as buffers, landscaping and stormwater, at the discretion of the Board of County Commissioners, for sites where the existing impervious surface exceeds 40 percent. In all cases where relaxation of standards, either exists in the current code or is proposed in the update, is considered it should be accompanied by technical recommendations from staff guided by deviation limits. This would provide a measure of certainty to the regulated public wishing to avail themselves of redevelopment opportunities.

ii. Potential Additional Approaches

Redevelopment enhancement opportunities could include changes to the Land Development Code, Comprehensive Plan and County Economic Development Incentive policies.

Activity Center Policies in the Comprehensive Plan, particularly Policies 2.1.1 through 2.1.8 under Objective 2.1, contain redevelopment incentive concepts that selectively could be incorporated into other portions of the Comprehensive Plan and Unified Land Development Code to promote general redevelopment. In addition, stronger and additional Goals, Principles, General Strategies and Policies in the Comprehensive Plan could further enhance and reinforce the importance of redevelopment as a “first strategy” in development in the County. Changes in the Comprehensive Plan could provide an important policy framework for changes to the Land Development Code to incentivize redevelopment.

Review of land development policies in other jurisdictions throughout the country reveal, in addition to those types of standards relief noted above, three additional principal ways of incentivizing redevelopment in a jurisdiction. First is the opportunity to provide for increased densities and intensities of development. These enhanced densities and intensities should be in keeping with the general character and scale of the area and not overburden existing infrastructure. By providing increased densities and intensities the County will help offset some of the additional financial burden of undertaking gray field development. In addition to the flexible design standards contemplated in Section 407.05 of the existing ULDC, other considerations could include allowing current non-conforming uses to be rebuilt within the same footprint, additional building height, enhanced signage and reduced parking. The second opportunity is to provide for a mix of uses available for redeveloped sites. Providing a mix of uses, again keeping the general character and scale in mind, not only provides the opportunity for a

larger return on investment for the redeveloper it also provides public purpose benefits for the County by reducing vehicle miles traveled, promoting the opportunities for walkability and internal capture of trips. Finally, the County may also consider expedited permitting and providing an incentive for redevelopment by reducing certain permitting fees associated with redevelopment.

Finally, outside the scope of the Comprehensive Plan and Unified Land Development Code , the County could consider adopting certain economic development incentives to encourage redevelopment. For example, in areas the County wishes to spur redevelopment a full or partial rebate, for a specific period of time, of the ad-valorem taxes on the incremental value created by the redevelopment could be considered. The County could create a non-CRA Tax Increment Fund (TIF) to focus infrastructure investment in areas considered for redevelopment This TIF approach has been used successfully in Manatee and St. Johns Counties in Florida. In addition, the County could pursue Brownfield Grants from the EPA to “remediate” contaminated or perceived contaminated sites in order to make them more marketable.

The International Development Council considers expedited permitting, infrastructure improvements, tax increment financing, and other investment-oriented incentives as emerging best practices.

All of the incentives outlined above could be applicable County-wide, for areas with certain development characteristics or within certain geographical areas the County has a public purpose interest in redeveloping. However, for the most impact the County should consider defining a specific geographic area(s). Moreover, these incentives would seem naturally applicable to the older development on the east side of the County. This would have the dual benefit of potentially providing jobs in this historically underserved portion of Alachua County.

G. Supporting the Agricultural Economy

Much of Alachua County is rural in nature. As such, support of the agricultural community was one of the areas of interest County staff requested be examined in this report. Section 6.0 Rural and Agricultural Policies in the Future Land Use Element of the Comprehensive Plan place a high priority on the preservation and protection of agricultural and rural assets and recognize their economic importance and place in Alachua County.

According to the 2012 Census, Alachua County had 1,662 farms accounting for 187,985 acres (or 54% of land) within the County boundaries. The median farm size was 22 acres with 237 farms being less than 10 acres. 33 farms were over 1,000 acres in size. Total farm receipts in 2012 was \$102.5 million. This represents a significant portion of the economy in Alachua County, being the 4th ranked industry within the county for value added. Research shows that Alachua County agriculture has a value added impact of \$255.4 million.

Agriculture, natural resources, and related industries are the third largest employer in Alachua County. 37,147 jobs in Alachua County were related to agricultural operations, representing 23,4% of the total employment in the County.

Providing policies and regulations that encourage farming while discouraging non-agricultural land uses that are incompatible with farm operations, is an effective tool to preserve farming operations. The County currently has many such regulations in the ULDC. Additional language in the ULDC is required to implement Policy 6.1.5.4 of the Future Land Use Element (FLUE) of the Comprehensive Plan which that supports the agricultural economy. FLUE Policy 6.1.5.4: requires that standards be included to allow small scale agriculture uses, such as “aquaculture, apiculture, poultry and rabbit raising” in the Urban Cluster.

Strong agricultural zoning regulations offer many benefits. They discourage non-agricultural development on farmlands. Discourage the costly extension of roads, water, sewer and other utilities, and help to slow suburban sprawl. They also direct development to more appropriate areas that have public utilities. Agricultural zoning regulations that can maintain a critical mass of farmland is necessary to the vitality of the agricultural community and to support agricultural operations.

Alachua County’s ULDC should be explicit about protection of agricultural lands, resources and uses, not simply "rural areas" or other less specific language. Farms should not be regarded as holding areas for future development, but should be considered to be fully-developed as the "highest and best use." Agricultural areas should be zoned to permit a wide range of normal and customary farming activities, supplemental farm businesses, and other compatible activities. The Alachua County ULDC currently allows a wide variety of agricultural uses compatible with uses in many zoning districts such as agritourism and ecotourism, produce stands, agricultural processing, farmer’s markets, and community gardens. As part of the ULDC update, the agricultural and conservation uses specified in the Article II. Use Table will be examined to determine if they contemplate traditional and non-traditional uses. Other ways for the economic

viability of the Alachua County agricultural community should be explored. Additional ways to promote local food and agricultural resources should be built into the ULDC.

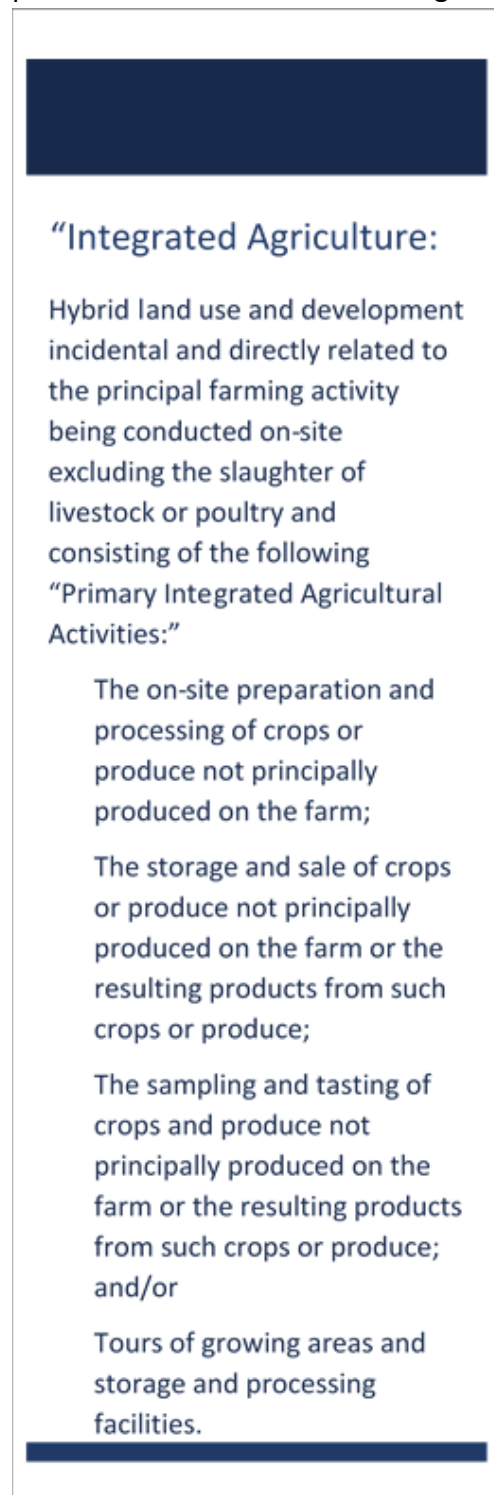


Figure 20 - Integrated Agriculture

Strategies for effective agricultural zoning ordinances throughout the country carry these similar characteristics:

- Regulations that non-agricultural lots are as small as possible.
- Non-farm residential developments are separated from the effective agricultural zone by physical distance, because routine agricultural practices can have effects that can cause odors, dust or noise to travel over lot lines. A good practice requires non-farm subdivisions to carry a deed restriction that runs with the land informing prospective lot purchasers of common farming activities that could be considered as nuisances by non-farmers.
- Ordinances encourage the retention of large agricultural tracts to maximize the efficient use of land. The minimum lot or parent tract size is typically 10-50 acres.
- Regulations discourage the creation of "gentlemen's farms" because small farms typically are not suited for long-term commercial agriculture.
- Regulations avoid allowing non-farm activities that are incompatible with agriculture such as retail uses or activities that create significant areas of impervious surfaces or traffic generation.
- Activities that support agriculture such as farm equipment repair, farm stands, nutrient management or breeding consulting, and similar activities are permitted by special exception to ensure that they do not limit the potential for productive farming practices.
- The extent and range of non-agricultural uses within the district should be limited and should support agricultural uses and activities, and other uses should be strictly regulated. The impact of new residential uses is limited by the use of setbacks and clustering.

Additionally, regulations related to agriculture should be reviewed with a keen eye toward letting farmers be flexible and able to pivot as times change. Regulations should not be the same for farming operations as they are for commercial activities. Financial constraints, seasonality, location, size and type of agriculture should all be taken into consideration. For example, parking needs for a seasonal on-farm restaurant may not need to provide the same amount of parking or meet the same of-street parking requirements as traditional restaurant. Agricultural uses permitted by approval of a Special Exception, Special Use, or Limited Use approval should be reviewed and examined for necessity. New definitions such "Integrated Agriculture" and "Agripreneurism" may be considered to support the agricultural community, encourage its growth through flexibility and creativity, and secure its foothold as part of the fabric of Alachua County.

While the ULDC addresses many of these currently, during the full update of the ULDC, the Commission may wish to include additional standards to support, protect and preserve the economic benefits of agriculture in our community.

III. RECOMMENDED NEXT STEPS

The recommended next steps in the ULDC process involve beginning the process of the full ULDC Title 40 update. Working hand-in-hand with County staff, Kimley-Horn will work through the list of items identified in the Amendment Matrix in Appendix A. Each item will be considered and it will be determined if it is an item that should be addressed and if so, where and how. There may be comments that were received that are not appropriately addressed in the ULDC and they will be so noted in the expanded Amendment Matrix. There may be comments that are contradictory to policy directions that the County Commission has given that will also not warrant a change to the ULDC. These items will be identified in the expanded Amendment Matrix.

As detailed in the Introduction & Overview section, the overall work plan for this project consists of three steps:

1. Project Kick Off (Complete)
2. Review Existing Practices and Develop Best Practices Report (Current)
3. Draft ULDC Amendments and Public Outreach (April – September)

Once the land development code text has been updated and adopted and before making any necessary map amendments, an update to the zoning map will be required and should be initiated by County staff. Any countywide map amendment should be accompanied with an “opt-out” provision for property owners that don’t support a proposed zoning district change on their property.

- i. Unified Land Development Code Amendment Review/Revision Presentations

Using direction given by the Board of County Commissioners regarding this Best Practices Report Kimley Horn will work hand in hand with County Staff to begin proposing amendments to the ULDC. It is proposed that the presentations through the remainder of the ULDC update project are broken into manageable topical areas. The presentations will not concentrate on wordsmithing, review of all new graphics, or a line by line review of items shown in tables. Instead, the focus will be on the major topics and approaches as outlined below:

1. Zoning Districts and Use Regulations (Chapters 403 & 404)
2. Special Districts and Activity Centers and General Development Standards (Chapters 405 & 407)
3. Natural and Historic Resource Protection (Chapter 406)
4. General Provision, Administration and Procedures, Definitions, & Potential Zoning Map Amendments (Chapter 400, 401, 402, 408, 409, & 410)

Over the next three months, the Kimley-Horn team will work with County staff to methodically update the ULDC based on the feedback provided regarding the assessments of the major issues identified in this Report, as well as the comments received and recorded in the ULDC Update Amendment Matrix comments (see Appendix A).

Appendix A

Amendment Matrix

As of the date of this Best Practices Report 393 comments have been captured related to the ULDC update from the data collections efforts. Issues identified or comments provided by either internal or external stakeholders have been documented in this report which is the “Amendment Matrix.” The Amendment Matrix is used as a catalogue of all comments received and proposed action taken, if any. The Amendment Matrix is also available at the Alachua County Growth Management Department or on the County’s website.

ALACHUA COUNTY ULDC AMENDMENT MATRIX (APRIL 2020)

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
1.	N/A	Codifying ULDC. Add recommendations for appropriate codification frequency to Best Practices Report
2.	TITLE 40	Check and update lower cased references to chapters, sections, etc.
3.	Ch. 410.	Definitions - Add definitions, update, and revise
4.		Landscape installation for all development types. Clarifying existing language is for non-residential and providing separate standard for residential.
5.		Tree mitigation in general and also clarifying if trees can be cleared on lots (less than ¼ acre or certain size) with the construction permit. Developer has to pay for mitigation of these trees anyway. Also address mitigation of trees between 8 inches and 20-30 inches. Clarify mitigation requirements and process/decision making. Sedimentation and erosion issues? Gopher tortoise habitat inspection
6.		Areas between sidewalks and buildings for non-residential tend to contain nothing except AC units, and rocks or mulch. Suggest: Requiring building foundation plantings?

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
7.		Need to consolidate all landscaping/irrigation requirements in one article.
8.		<p>Buffers and screening – requirements for screening (usually fences), and then added requirement for landscaping outside the fence in what becomes no-man’s land.</p> <p>Possible solution 1: redefine screening to get rid of fences (also preferred for open space, so adjacent open spaces are not blocked off from one another).</p> <p>Possible solution 2: do not require landscaping outside of fence area.</p>
9.	Ch. 407.43(c)7.b.	Subsection was removed with a current code update and is no longer found in the MUNICode ULDC version.
10.		Fencing is often installed after irrigation and then bisects the irrigation system, which decreases the efficiency.
11.		There is still a trend of new development installing irrigation on every lot, we hoped this trend would decrease with the adoption of the Irrigation Design Code.
12.		The area between the sidewalk and the road is often irrigated turf which creates overspray and contributes to grass clippings (and likely fertilizer) in the road and storm drains. This area often has utilities/infrastructure, so will have to be considered.
13.		SJRWMD expressed concern regarding trend of irrigated highly maintained landscapes in and around retention basins. If these areas are fertilized this creates a water quality issue.
14.		Look at road cross sections, especially sidewalks and planting strips – example of Tara Estates – could have done one 8’ foot path but developer chose two 6-ft

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
		<p>sidewalks instead. Add 8-ft planting strip on either side and it becomes a concrete jungle with wasted landscape strips.</p> <p>Consider mandating the 8-ft path instead of allowing developer to choose the more impervious option? How would we deal with street trees?</p>
15.		<p>Canopy coverage calculation ends at the property line. Canopy passing off property should not be counted in initial canopy and canopy hanging over the property from adjoining property needs to be counted as initial canopy for the subject property.</p> <p>This has been an implementation standard not specifically addressed in the current ULDC and has been the interpretation for a number of years.</p>
16.		<p>Planted pine silviculture canopy does not count as original existing canopy but may be counted towards future canopy (especially if it is long leaf pine) as long as it can be considered a part of the best quality canopy on a site. Planted pine plantation canopy does not count against the property owner/developer and does not count as existing canopy.</p> <p>This has been an implementation standard not specifically addressed in the current ULDC and has been the interpretation for a number of years. This interpretation was made so as not to incentivize or discourage one form of agricultural pursuit over another prior to development of a property.</p>
17.		<p>It should be made clear that TNDs and TODs should have the best 5% retained (not just any 5%).</p>
18.		<p>Alternative compliance should be stated on the plans anytime it is used. The code section seeking to be modified should be stated on the plan.</p>

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
19.	406.12(d)3	<p>Add the following to 406.12(d)3<u>e</u>. - Silt fencing shall be placed on the development side of any required tree barricading.</p> <p>This is commonly commented upon in reference to drip line 406.12(a)5. protection and is in an attempt to better preserve the root system of protected trees.</p>
20.	406.12(c)2.a.	<p>Modify 406.12(c)2.a. to state – “The development plan shall be overlain on an aerial photograph from which the Initial canopy is calculated. Initial canopy shall not be estimated from the tree diameter unless the crown of an individual tree cannot be determined from the aerial. If the crown size is estimated, crown diameter shall be calculated by attributing one foot of radius credit for each inch of trunk diameter measured at 4.5 feet above average grade.”</p> <p>This is commonly commented upon in reference to drip line 406.12(a)5. protection and is in an attempt to better preserve the root system of protected trees. It also allows for a reasonably accurate measurement of crown spread without measuring the actual crown in the field. It also better protects the structural root system of trees that have a lean.</p>
21.	407.43.1(a)1 or 407.43.1(c)2.	<p>Clarify 407.43.1(a)1 or 407.43.1(c)2. - 11/19/15 It was determined by Steve Lachnicht (former GM Director) that sidewalks around the foundation of buildings are not considered "paved and unpaved paths not coincident with a street as per 407.43.1(a)1.” and do not need canopy trees on 40' centers. They are considered paved ground surface areas within parking areas when coincident with drive isles or parking stalls and shall be calculated into the 50% of paved ground surface areas under mature canopy in 20 years requirement 407.43.1(c)2.</p>
22.	406.13(b)	<p>Create an addition to 406.13(b)8. Planted palms shall only receive 2" of mitigation credit for each palm planted.</p>

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
		This has been an implementation standard not specifically addressed in the current ULDC and has been the interpretation for a number of years. It is my understanding that other jurisdictions do this and it is not to overly incentivize the planting of 10-12" palm trees with small crowns over the standard 1-2" broadleaf canopy tree.
23.	406.12(a)3.	Change "tat" to "that".
24.	406.12(c)1	Require notarized affidavit from all property owners. This has been a Department implementation standard since mid-2019 for all tree removal permits.
25.	406.12(d)3.b.	Change "construction" to "development" Construction activity is not defined in the ULDC and Development activity is defined.
26.	406.12(d)3.b.	Find and replace "construction activity" to "development activity"
27.	406.12(d)3.b.	Find and replace "Landscape" to "Landscaping"
28.	406.12(d)3.b.	Find and replace "County Forester/Landscape Inspector" with "County Forester/Landscaping Inspector"
29.	406.12(d)6.d.	Change to state "Landscape preparation in the undisturbed area shall be prohibited unless specifically approved otherwise by the County Forester/Landscaping Inspector." This change is designed to increase root system protection within the limited areas dedicated to onsite tree preservation.
30.	406.13 (a)1.	Change 1. "A tree may be relocated on site and if the tree is successfully relocated, no mitigation will be required by the County."

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
		This shifts the preferred method of preservation from onsite relocation to replanting. Replanting is the private industry preferred mitigation strategy. This is because relocation is cost prohibitive and the success rate of a relocated heritage size tree (20" diameter) is not guaranteed and the aftercare in terms of time and water of a tree that size is very high. This is counter to some of the other County policies that encourage water conservation.
31.	406.13 (a)3.	<p>Change "two" to "five"</p> <p>A tree such as a live oak may take 5+ years to die from the abuse from the transplanting. Live oaks would be the most likely tree to be transplanted in this area due to its higher mitigation cost of removal, its likelihood of transplant survival and its inherent value placed upon it by the citizenry.</p>
32.	406.13 (b)1.	Remove the word "regulated." It is redundant.
33.	406.13 (b)2.	Change "regulated" to "heritage." The verbiage following describes heritage not regulated.
34.	406.13 (b)4.	<p>Remove completely and replace with "At the discretion of the County Forester/Landscaping inspector mitigation for the removal of native heritage trees shall be with preferred native tree species appropriate for the historic or current site conditions."</p> <p>This allows the County and the private industry more flexibility in improving the diversity of the canopy within the County. Most of the trees being mitigated are secondary growth live oaks and laurel oaks due to the western Alachua County agricultural heritage, the trees that were in the County historically (prior to human activity) were more diverse and a different composition. This more diverse composition should be enhanced where possible and changed where</p>

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
		needed (such as in newly created stormwater management facilities).
35.	406.13 (c)1.	Add to the end of the sentence "...prior to issuance of a County Construction Permit." This adds clarification and specificity.
36.	406.15	<p>Table 406.15.1 Add "Small specimen trees" in front of "Less than 8 inches 2" in in order to state "Small specimen trees less than 8 inches 2".</p> <p>This is only if the Commission adopts the specimen tree designation modifications to Table 407.50.1 proposed by EPAC. Otherwise, delete the row in its entirety as trees less than 8" are not currently required to be surveyed and are also not considered "regulated" in other sections of the ULDC and their existence is next to impossible to regulate.</p>
37.	Table 406.16.1	<p>If the modifications to tree specimen tree designation modifications to Table 407.50.1 proposed by EPAC are adopted, shorten Table 406.16.1 to not include the trees incorporated into the modified tree table 407.50.1.</p> <p>Would reduce confusion and duplication and result in code clarity and brevity.</p>
38.	Table 406.16.2	<p>Change "Discouraged" to "Prohibited"</p> <p>These species are not commonly utilized by Landscape Architects. When they are proposed for use, they are easily discouraged from being used due to the current table and because alternatives are readily available in the nursery industry. Many species on the list are not available in the nursery industry due to their state recognized invasive qualities or their fall from favor with the nursery industry and the public.</p>

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
39.	Table 407.43.2 or 407.43(c)4	<p>Add asterisk (*) at bottom of Table 407.43.2 that states “* plant material specified in the table above are separate and distinct components of each 100 linear ft. of buffer planting” or add a column to Table 407.43.2 that states “total trees”. Or modify 407.43(c)4.</p> <p>This would add clarity and specificity to the intent of this section of code.</p>
40.	407.43(c)	<p>Add the following to #5. “Buffer material shall be spaced so as to occupy the entire width of the buffer so as to provide the greatest buffering.”</p> <p>This would add clarity and specificity to the intent of this section of code.</p>
41.	407.43.1(b)1.	<p>Change “or” to “and”</p> <p>This would result in greater shading of streets in larger subdivision entrances. Currently if a large subdivision proposes multiple lanes of traffic onto a County roadway, there is typically a median proposed. This large expanse of pavement may only require trees in the median according to current code. A smaller subdivision requires street trees along both sides of streets with a narrower entrance roadway and would have a resulting greater pavement coverage percentage. Requiring smaller subdivisions to have a higher standard of entrance canopy coverage.</p>
42.	407.43.1(c)3.	<p>Strike the word minimum “The minimum width of a terminal landscape”</p> <p>This would not differentiate between a terminal island and any other required island within a parking area and would make the language consistent with the referenced table 407.45.1.</p>

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
43.	Table 407.44.1	In "Tree Type" column... Add "Street" in front of the first word "Tree" To add clarity and specificity likely to the code sections original intent.
44.	407.44(c)2.	Add evergreen and or non-deciduous after "woody." This would prohibit the planting of deciduous (lose their leaves) shrubs. Most shrub specifications within the ULDC are required for buffering purposes and shrubs that lose their leaves do not buffer very well in the winter.
45.	Table 407.45.1	Add asterisk (*) at bottom of Table 407.45.1 "*" Minimum dimension in any direction is 8 feet unless otherwise specified." This is to provide clarity and allow as much separation from pavement as possible while allowing for the current street tree planting standard to not be changed.
46.	407.45(b)	Remove word "maximum." The word maximum would imply that some landscaping is allowed to die. This would be inconsistent with the current code section 407.47(a-d) that effectively states that all landscaping from an approved landscape plan is required to be replaced if and/or when it fails.
47.	407.45(b)6.	Add "biodegradable" before the word "Stakes" in the second sentence. Requires the tree bindings required to keep some newly planted tree upright to self-degrade. These bindings frequently do not get removed after instillation. The instillation company is frequently not the landscape maintenance company and the removal of the staking system falls through the cracks and is never removed. If removal does not occur, it

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
		binds into the tree as it grows and can cause the tree to die.
48.	407.47(d)	<p>Add “mature trees overgrowing driveways should be pruned <u>a maximum of 14 feet</u> to allow”</p> <p>This is consistent with fire rescue and DOT standards for clearance and sets a limit on what is considered normal raising of the canopy.</p>
49.	407.47(d)	<p>“Tree, shrub and Other Woody Plant Maintenance add “Management” – Standard Practices” add “(Pruning).”</p>
50.	410	<p>Definitions Tree, Heritage: Remove “nonnative trees”.</p> <p>This would only affect camphor trees and possibly a few select other invasive exotic tree species and possibly pecan trees which would typically be associated with a bona fide agricultural activity. The County would only rarely encounter one of these heritage nonnative trees and would typically encourage its removal.</p>
51.	407.43.1(c)8.	Remove or add criteria as the current code is unenforceable due to its lack of standards.
52.	407.43.4(d), 407.44(b)3, 407.45(b)4., and 407.45(b)8.	All of these sections are redundant and should be consolidated.
53.	407.45(b)7.	<p>Change to state “8 to 10” tall trunk protectors are required for all installed trees to protect the base of the trunk from mower and string trimmer damage.</p> <p>Numerous trees have been damaged from this activity even those trees within bedded/mulched areas.</p>
54.	407.40(c) and 407.46(a)5	These sections are redundant and should be consolidated.

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
55.	Table 407.50.1	Remove the column for “Maximum Height (feet).” It is not utilized for any code related purposes and the information is generally not useful and is likely inaccurate.
56.	Table 407.50.1	Remove “Additional Comments:” The statement is inaccurate.
57.	Table 406.43.1	Outstanding Florida Waters (OFWs) - Change from 150 to 200
58.	Ch. 406/Article VIII	Springs and High Aquifer Recharge Areas - Make changes provided from County in Word Doc. [KH NOTE: proposed edits are too large to enter into the Matrix]
59.	Ch. 406/Article XVI	Significant Geologic Features - Make changes provided from County in Word Doc. [KH NOTE: proposed edits are too large to enter into the Matrix]
60.	Ch. 406/Article XVII	Conservation Management Area - Make changes provided from County in Word Doc. [KH NOTE: proposed edits are too large to enter into the Matrix]
61.	Tree Protection Change to Tree Code	See EPAC proposed changes to tree code_090313draft - Make changes provided from County in Word Doc. [KH NOTE: proposed edits are too large to enter into the Matrix]
62.	Table 407.50.1	Update Table - Make changes provided from County in Word Doc.

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
		[KH NOTE: proposed edits are too large to enter into the Matrix]
63.	401.20(d)(10)	Reference incorrection states 402.142(c)(1) - Should this be 407.73(f)1?
64.	Table 402.44.1	All Development Types - Proposed developed area of parcel contains Strategic Ecosystem. May add threshold for tree removal.
65.	403.02(b)	Will be changes with new Open Space language.
66.	404.96.(a)(2)	Add Citations to Florida Administrative Code Reference.
67.	404.108	May propose new rules to address boathouses and terminal platforms instead of the walkway.
68.	405.15(c)	Exhibit is missing for 405.15.2
69.	Ch. 405/Article VIII	Preservation Buffer Overlay District lacks recently updated language approved by BoCC in the fall of 2019 - Add updated language.
70.	Ch. 406.02.	Verify all references are correct (a-i).
71.	Ch. 406.50(h)	Rule 62-312.090 has been repealed – Update
72.	Ch. 406.50(l)	Clarify that this doesn't mean you can build an SMF in a low quality wetland.
73.	Ch. 406.59.1	The following additional standards apply to development activities within high aquifer recharge areas.... Change high aquifer recharge areas to Karst Sensitive Areas.
74.	Ch. 406.59.1(f)	Are we ready to apply this standard (coordinate with Health Dept)? Why just one acre or smaller?
75.	Ch. 406.66(b)(1)(a.)	Look at F.S. 373.316 reference

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
76.	Ch. 406.90(b)(3)	Outstanding Florida Springs Priority Focus Areas – slightly less protective.
77.	Ch. 406.92(a)	For Shane to review and make edits to clarify that this does not mean excavating and backfilling with archer sand.
78.	Ch. 406.102(a)	Clearing, grading, and filling may be prohibited within the setback area unless the applicant can demonstrate that “conservation resources” Look at conservation resources.
79.	Ch. 406.103(a)(2)	Add a reference to SFR permit (to address Cross Creek residences that have to go to DRC)
80.	Ch. 407.41	Possibly add objective regarding a climate change component (shading, heat island effect)
81.	Ch. 407.43(c)(6)	Need to provide more flexibility on screening and address open space/wildlife connectivity, have a mechanism to exempt screening where it makes sense (especially since you are then required to landscape outside a fence)
82.	Ch. 407.43(c)(6)(c.)	Needs to provide some flexibility (example, cattery site where they will be required to install a fence and landscaping around a shed).
83.	Ch. 407.91(b)	Update references to codes and chapters
84.	Ch. 407.94(d)(2)	Change (3) and (4) to (e.) and (f.)
85.	Ch. 407.94(d)(3)	Add references to Section 77.27
86.		Specify whether power is allowed on vacant property
87.	Ch 404.62(j)(2)	Remove reference to HBB affidavit
88.		Clean up language in FHEs relating to residual less than 5 acres

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
89.	404.142(c)(1)a	Delete 404.142(c)(1)a
90.		Discuss requirement for 250' of frontage as it applies to individual lot splits in urban residential areas.
91.		Specify that individual platted lots may not be divided unless expressly provided for on the plat.
92.		Specify that a replat is not required to combine two platted lots.
93.		Discuss whether to require combining lots if building across both.
94.		Look into whether court ordered lot splits override local land development regulations and address in Code if needed.
95.		Incorporate a use category for service-oriented businesses with allowable districts and standards.
96.		Review lot of record definition and compare to other jurisdictions to see if there is a better approach.
97.	407.73(g)	Look at lot reconfiguration language and consider additional flexibility for variance lots and nonconforming lots.
98.	Ch. 401	Clarify that approving body approves revised plans.
99.	402.61	Scrivener's error - Update to two years vs one year (consistent with 402.60. scrivener's error)
100.	Ch. 402	Expiration of Preliminary Development Plans
101.	Ch. 402	Improving neighborhood meeting times and notifications – different communication styles. The Board wants us to look at changing when we allow neighborhood meetings to occur.

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
102.	Ch. 402	90-day insufficiency/development review fee valid for one year.
103.	Ch. 402	Family homestead subdivisions cross references?
104.	Ch. 402	402.15 Florida Statute references. Some references have changed.
105.	Ch. 403	Density definition.
106.	Ch. 403	Blending densities across zoning districts (Wimberley example)
107.	Ch. 403	Consolidating zoning districts
108.	Ch. 404	Education facilities and places of worship - require DRC for change of use instead of admin review? Reference to administrative development plans for change of use to a permitted or limited use except where DRC approval is required [401.20 (b)15]
109.	Ch. 404	Excavation and Fill – clarify if rest of code (open space, tree retention, landscaping, etc.) applicable, or have specific provision that buffers satisfy open space, tree canopy, etc.
110.	Ch. 405	Preservation buffer development application – Admin plan? (cross reference Chapter 401?).
111.	Ch. 405	Clarify materials required for wetland buffer or preservation buffer applications (survey, etc.).
112.	Ch. 406	Trees
113.	Ch. 406	Tree mitigation – clarifying if trees can be cleared on lots with construction permit. Clarify mitigation requirements and process/decision making. Sedimentation and erosion issues Gopher tortoise habitat.
114.	407.64 (d)2.c	Delete - TND within USA maximum of 250 sf (Comp Plan)

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
115.	407.65 (d)(2)c	Delete - TOD within USA max of 500 sf (Comp Plan)
116.	Ch. 407	Lot split in urban cluster - change requirement for 250 feet of frontage.
117.	Ch. 407	Clarify if allowed to split lots in platted subdivision – pre and post 1991.
118.	Ch. 407	Internal roads in rural/ag subdivision – clarify if internal road required for all subdivisions or allowing driveway connection to county road for minimum number of lots?
119.	Ch. 407	Building elevations – require more glazing? Specify location of glazing
120.	407.109	Exception to sewer language – require recorded deed restriction prior to CP instead of within 30 days of approval.
121.	Ch. 407	Timing of landscape installation for all development types.
122.	Ch. 407	Clarify that following language is for non-residential. Provide different timeframe for residential. <u>No final certificate of occupancy shall be issued until the County has granted final approval and acceptance of the installed landscape as well as the protection of existing native vegetation.</u> Final approval shall include as-built landscape plan certification from a registered landscape architect certifying that the landscaping is installed and functioning as intended, that prohibited and discouraged non-native vegetation listed in Table 406.16.2 has been removed, and that all of the provisions of this Chapter have been met. The land owner shall submit a Certificate of Compliance, in a form acceptable by the Director, to the County as a condition of issuance of a Certificate of Occupancy.
123.	TND/TOD	Parking/streets in front of buildings adjacent to existing streets (Park Ave.)

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
124.	N/A	Add variance that BoCC can approve that if all economic value of a property is taken when the Code is applied they can apply for a variance from the BoCC.
125.	Comp Plan	FLUE 2.1.7 removes parking standards for activity centers
126.	Comp Plan	FLUE 2.1.10 removes development standards for activity centers
127.	Comp Plan	FLUE 4.4.3 adds standards for R & D activities
128.	Comp Plan	FLUE 5.4.5.3(a) adds standards for nursing home/ALF
129.	Comp Plan	FLUE 5.5.4 adds standards for R & D activities
130.	Comp Plan	FLUE 7.1.33 adds alternative standards to TND design for development in the Urban Cluster
131.	Comp Plan	FLUE 8.5.2 requires special area planning process for East Gainesville Urban Area
132.	Comp Plan	Transportation/Mobility Element Principle 4 removes transportation concurrency
133.	Comp Plan	Transportation/Mobility Element 1.4.1 adds requirement for electric charging stations in new multifamily, TND/TOD
134.	Comp Plan	Transportation/Mobility Element 1.8.3 adds requirement for report on fatalities/serious injuries on County roads
135.	Comp Plan	Housing Element 1.1.3 requires periodic updates to Housing Study
136.	Comp Plan	Housing Element 2.4.6 amends ULDC to allow adaptive reuse of vacant structures for affordable housing

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
137.	Comp Plan	Stormwater Element 3.1.1 implements advanced stormwater treatment code based on LID
138.	Comp Plan	Conservation & Open Space Element 4.5.21 requires ULDC updates for reduction in permanently irrigated areas
139.	Comp Plan	Conservation & Open Space Element 4.7.7 requires DRC approval of FDP for BoCC-approved wetland mitigation plan
140.	Comp Plan	Conservation & Open Space Element 5.2.1 reduces open space from 20% to 10%
141.	Comp Plan	Conservation & Open Space Element 5.2.2 provides alternative options for protection of conservation resources
142.	Comp Plan	Conservation & Open Space Element 5.2.3 requires contiguous, peripheral open space
143.	Comp Plan	Conservation & Open Space Element 5.7.10 adds standards for R & D waste-to-energy facilities
144.	Comp Plan - TND	PD zoning requirement eliminated - FLUE (1.6.1(c))
145.	Comp Plan - TND	Maximum non-residential area per residential unit increased from 200 to 250 - FLUE (1.6.5.2(c))
146.	Comp Plan - TND	LID now required in "Sensitive Karst Areas" - FLUE (1.6.6.6 and 1.6.7.4)
147.	Comp Plan - TOD	Requirement for PD zoning eliminated - FLUE (1.7.1(d))
148.	Comp Plan - TOD	Maximum non-residential area per residential unit increased from 400 to 500 - FLUE (1.7.5.3(c))
149.	Comp Plan - Activity Centers	Archer/34 th FLUE (2.2.4) and NW 53 rd Ave/441 - FLUE (2.2.5) eliminated from Comp Plan

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
150.	Comp Plan - Eastside Activity Center	Changes to specific development standards for density, FAR, etc. FLUE - (2.2.10)
151.	Comp Plan - Office Policies	Some changes in allowable uses and terminology – FLUE (3.9, 3.9.1)
152.	Comp Plan - Light Industrial Policies	Some changes in allowable uses and terminology FLUE (4.3, 4.3.1)
153.	Comp Plan - Waste-to-Energy Facilities/Incineration	Specific types of activities prohibited, with exceptions and standards to be adopted in ULDC - FLUE (4.4.3, 5.5.4)
154.	Comp Plan - ALF and Nursing Homes	Consolidation of these uses and their allowable future land use designations in Comp Plan – FLUE (5.4.5.3)
155.	Comp Plan - Utilities in Right of Way	Design priorities for transportation facilities FLUE - (7.1.32)
156.	Comp Plan - TND Design Standards	Certain TND standards, which were previously required in Urban Service Area, are now required in all of Urban Cluster – FLUE (7.1.33)
157.	Comp Plan - Urban Service Area	Eliminated from Comp Plan FLUE (Obj. 8.6 and related policies)
158.	Comp Plan - Transfer of Development Rights	Eliminated option for reduction of open space for TDR receiving areas (9.1.3(a)).
159.	Comp Plan - Research & Development Definition	Added new definition (FLUE definitions)
160.	Comp Plan - Transportation Concurrency	Repealed (multiple policies) - Transportation Mobility Element
161.	Comp Plan - Mobility Districts	Terminology change to “Urban” Mobility Districts (Obj. 1.1 and related policies) and new “Rural” Mobility Districts (Obj. 1.2 and related policies) - Transportation Mobility Element

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
162.	Comp Plan - LOS "Guidelines"	Changes to LOS Guidelines for Urban and Rural Mobility Districts (1.1.4 and 1.2.1) - Transportation Mobility Element
163.	Comp Plan - TCEPPPT	Transportation Concurrency Exception for Projects that Promote Public Transportation (TCEPPPT) Eliminated in Comp Plan (1.1.9 and related policies) - Transportation Mobility Element
164.	Comp Plan - Electric Vehicle Charging Stations	Required for new multifamily, TND, TOD (1.4.1) - Transportation Mobility Element
165.	Comp Plan - Future Traffic Circulation Corridors Map	Eliminated from Comp Plan (Map 10)
166.	Comp Plan	Relaxation of Impact Fees eliminated as an affordable housing incentive (1.2.2) – Housing Element
167.	Comp Plan	Provide for non-traditional housing alternatives, such as cohousing (1.2.7) – Housing Element
168.	Comp Plan	Regulatory incentives for development of housing units affordable to very low and extremely low-income households (1.2.8) – Housing Element
169.	Comp Plan	Establish expedited conceptual plan review process for affordable housing developments applying for Low-Income Housing Tax Credits (1.2.9) – Housing Element
170.	Comp Plan	Amend land development regulations to allow for adaptive reuse to facilitate the repurposing of existing vacant structures for affordable housing for very low and extremely low-income households (2.4.6) – Housing Element
171.	Comp Plan	New definitions of "cohousing" and "extremely low income" (Housing Element definitions)
172.	Comp Plan - Waste-to-Energy Facilities/Incineration	Specific types of these activities prohibited, with exceptions and standards to be adopted in ULDC

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
		(1.2.5, also see FLUE 4.4.3 and 5.5.4) – Solid Waste Element
173.	Comp Plan	County shall implement an “advanced stormwater treatment code” based on Low Impact Design (LID) principles, including provisions for the Sensitive Karst Area, OFW, and impaired waters (3.1.1) – Stormwater Management Element
174.	Comp Plan	“Low Impact Design” (LID) replaces former references to “Low Impact <i>Development</i> ” throughout Comp Plan – Stormwater Management Element
175.	Comp Plan	LID BMPs required for development in Sensitive Karst Areas (5.1.6) – Stormwater Management Element
176.	Comp Plan	New definitions of “Low Impact Design”, “Sensitive Karst Areas”, and “Best Management Practices” (for Stormwater) (Stormwater Element Definitions) – Stormwater Management Element
177.	Comp Plan	When septic systems must be installed within surface water and wetland buffers they must be located and designed to minimize impacts to regulated resources as determined in the LDRs and Water Quality Code. (3.6.5(d)) – Conservation & Open Space Element
178.	Comp Plan	Changes to OFW buffer requirement (3.6.8(b)) – Conservation & Open Space Element
179.	Comp Plan	Use of physical barriers during land use planning and development review if necessary to reduce particulate air pollution (4.1.5(c)) – Conservation & Open Space Element
180.	Comp Plan	New “Outstanding Florida Springs Priority Focus Areas” and related policies (4.5.4 – 4.5.6) – Conservation & Open Space Element

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
181.	Comp Plan	Continue to update ULDC for reduction in permanently irrigated areas for new development (4.5.21) – Conservation & Open Space Element
182.	Comp Plan	“Enhanced nitrogen reduction septic tank systems” may be required in highly sensitive areas, such as in proximity to OFWs, impaired waters, springs priority focus areas, and other areas (4.6.16(h)) – Conservation & Open Space Element
183.	Comp Plan	Requires BoCC approval of any development having significant adverse impacts to wetlands and wetland buffers, and mitigation proposals; DRC approval of a final development plan ensuring implementation of BoCC approved mitigation plan; other related changes (4.7.7). – Conservation & Open Space Element
184.	Comp Plan	Various changes to Open Space requirements (Obj. 5.2 and related policies and Energy Element 6.3.5) – Conservation & Open Space Element
185.	Comp Plan	5.7.10 (adds standards for R & D waste-to-energy facilities) – Conservation & Open Space Element
186.	Comp Plan	New Greenways Master Plan (Obj. 7.1 and policies, and map): <i>Need to incorporate into ULDC?</i> Conservation & Open Space Element
187.	Comp Plan	New definition of “Resilient Landscaping” (COSE Definitions) Conservation & Open Space Element
188.	Comp Plan	Recreation Master Plan Update shall be used to update level of service standards, land development regulations and park impact fees. (1.1.10) - <i>This may or may not require ULDC change at this time depending on the timing of the Master Plan Update relative to the ULDC update.</i> – Recreation Element
189.	Comp Plan	Revised fire level of service guidelines (1.2.5(a)) – Capital Improvements Element

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
190.	Comp Plan	Revised transportation level of service standards (now “guidelines”, not-concurrency) (1.2.5(e)) – Capital Improvements Element
191.	Comp Plan	Transportation Concurrency Exception for Projects that Promote Public Transportation (TCEPPPT) eliminated (1.3.2(c)) – Capital Improvements Element
192.	Comp Plan	Transportation Concurrency Backlog Authority process eliminated from Comp Plan (Obj. 1.10) – Capital Improvements Element
193.	Comp Plan	Continue to include local health agencies in developing County planning policies and development standards for the built environment in order to address health impacts (1.3.3.1) – Community Health Element
194.	General	Consolidate and simplify zoning categories and development regulations to promote greater integration of land uses and compact, walkable mixed use urban development in the Urban Cluster, taking into account open space, landscaping and utility requirements. (from BoCC Evaluation & Appraisal notification letter to FDEO 3/13/18)
195.	407.90.	A waiver from particular requirements of this article may be granted by the County Engineer where a building addition... “Strike building addition” replace with “development”
196.		All structures adjacent to stormwater management facilities shall be designed with a minimum finished floor elevation of one foot above the design high water elevation of the basin and shown as such on all related development plans and plats.
197.	407.91.(e)(11)	Add “except as approved by the County Engineer” after “..development plans and plats.”

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
198.	407.97	"The following information, plans and supporting data must be included with the applicant's final development plan..." Add "; the County Engineer may grant waivers to this section in accordance with Section 407.90"
199.	407.97(c)(5)	Correct the spelling of "identification"
200.	407.97(d)	"Soils report that includes borings, water table encountered, estimation of seasonal high water table, and estimated soil permeability/hydraulic conductivity"... Add "of each soil stratum included in the analysis."
201.	407.68.(d)(1)	See TND & TOD Word Doc from Public Works. [KH NOTE: proposed edits are too large to enter into the Matrix]
202.	407.69 (a)	Add Article XIII Chapter 407
203.	404.100(e)	Strike "USGS" and "or USGS topographic map"
204.	406.56(b)(1)(g.)	After "...develop a manufactured home park...." Add "or commercial development of TND/TOD"
205.	407.86(c)	Rename subsection (c) - Approval and Acceptance for maintenance of right-of-way
206.	407.86(c)(2).	See Sec. 407.86 Word Doc from Public Works. [KH NOTE: proposed edits are too large to enter into the Matrix]
207.	407.86(d)	Rename subsection – strike "for maintenance"
208.	407.86(d)(1)a.	See Sec. 407.76 Word Doc from Public Works [KH NOTE: proposed edits are too large to enter into the Matrix]

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
209.	407.86(d)(2)	Delete 407.86(d)(2)
210.	Article XXII	<p>Add an Article XXIIA Construction Permits Section 402.140.A General Provisions</p> <p>(a) <i>Consistency and compliance.</i> All Construction permits shall be consistent with and comply with the following:</p> <p>(1) The Comprehensive plan;</p> <p>(2) This ULDC;</p> <p>(3) All other applicable federal, state and county laws, codes and requirements.</p> <p>(b) <i>Improvement of property prior to issuance of a Construction permit.</i> When a construction permit is required, site work, site clearing, grading, improvement of property or construction of any type shall not be commenced prior to the issuance of the issuance of the construction permit.</p>
211.		We need to add to the Code update list addressing a five-year cumulative impact for substantial improvements in flood hazard areas to either Section 406.53.5(b) and/or Substantial Improvement definition in 410.
212.		<p>Consider additional stakeholders:</p> <p>ACT</p> <p>Sierra Club</p> <p>Environmental</p> <p>Social Justice</p> <p>Business Interests</p> <p>Women for Wise Growth</p> <p>Gainesville Citizens for Better Transportation</p> <p>Environmental Protection Advisory Committee</p> <p>League of Women's Voters</p>
213.		Housing Affordability needs to be considered
214.		School equity (referenced quality assessment done for schools that is linked to Zillow and ranked housing as 1/10 based on quality of schools. What can be done to avoid this in the future?)

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
215.		How can we bridge the divide between East and West Alachua County?
216.		Aquifer is vulnerable due to the Code Scarp on the east side. Septic tanks are an issue. If you are on the west side of the County you are on advanced septic. Need to consider regulations for septic tanks.
217.		Conservation Clinic at UF Law School can help with questions or sticky points
218.		Remove five-year cumulative impact for substantial improvements in flood hazard areas to either Section 406.53.5(b) and/or Substantial Improvement definition in 410.
219.		Remove as much rigidity and provide as much flexibility as possible.
220.	407.05	We need to clarify allowances for driveways and similar concrete slabs in our allowable projections section. The way the Code is technically read currently they are not allowed, but we never prohibit someone from pouring a concrete driveway or parking pad in their setback. What we've done to keep it non-permanent in the past for patios and similar pads is to say they can use removable pavers so it's not really considered permanent, but I would rather be clearer and just allow it or not. The allowable projections section is 407.05.
221.		Conflicts between ULDC, Green Book and Corridor Design Manual.
222.		TND Standards and Corridor Design Manual standards should be combined to make a unified set of standards.
223.		Look to see what other communities are doing in terms of acceptance of roads.

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
224.		Consider what other communities are doing in terms of Special Assessment Districts (that would be a function of the County government but would help to fund ongoing maintenance etc. in subdivisions (examples may be Charlotte Co. and Marion Co.)
225.		Look at what other communities are doing regarding stubbing out for future connections (example 39 th Street Skilled Nursing Facility)
226.		Consider adding language that ROW cannot be encumbered with any easements before County acceptance (ie. GRU blanket easement)
227.		Look at Stormwater Code (Article 77 of County Code) – see how it is referenced in the ULDC and ensure its current
228.		Rather than citing a specific reference by volume or date, just put “current edition”
229.		May need to define what are collector roads and what are local roads
230.		Add local road standards – can be controlled at the local level
231.		Article XIII Access Management – left turn storage lanes (would require an applicant to provide a speed study – look to see what other communities are doing)
232.		Give County Engineer authority to permit waivers as much as possible (Article IX and other locations)
233.	XXII Building Permits	Add section on Construction Permits
234.	Section 404.100	Remove reference to USGS

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
235.		Urban Service Area Standards should be designed by TND Standards; make a distinction for non-TND projects
236.		Adopted 8-10 Urban Service Area – Design everything in area as a TND project. Not clear what standards apply to what projects.
237.		Tree preservation – Look to see if there is any impact to the dripline or any way to keep the larger trees. Consider mitigating and making a plant basin.
238.		Zoning Districts – Comment to consider combining MS & MP. RP is not useful and BR-1 & BA-1 are not used frequently.
239.		Community uses – need design standards / building designs.
240.		Sign issues – Last updated 6 months ago
241.		Review GRU standards for accessory dwelling units (i.e. car washes, RVs / tiny homes).
242.		Consider fixing TND standards.
243.		Corridor Design Manual – Consider changing language of collector definition; replace “functions as a collector” to “is a collector”
244.		Process Chapter 402 – Many application standards are duplicative. Consider simplifying the language.
245.		Consider looking at how other jurisdictions do quantity credit for LID BMPs and develop alternative approaches.
246.		Septic systems in water quality code should require better treatment in higher charge areas. Also review who will review septic permits and county-wide septic codes.

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
247.		New TND and TOD new codes increase impervious surface. If parking is needed, add a structure.
248.		Incentivize affordable housing
249.		Draft Tree Code – Increase recapture clause. Incentivize to provide different layers of canopies. Save long-living large trees.
250.		Light pollution – Have directional lighting.
251.		Enact standards for electric car plugins / charging stations.
252.		See if Article 12 of WWTF needs to be updated.
253.		Collector roadways violate engineering minimum technical standards. There is no way to waive Greenbook collector roadways.
254.		Add a section for construction permits on Comp Plan.
255.		Update Corridor Design Manual 2002 to eliminate conflicts with the Greenbook, make amendments to Greenbook . Corridor Manual never met Greenbook standards.
256.		GRU feels the need to have control over easements to maintain facilities
257.		Need better communication with buildings proposed in TNDs & TODs pertaining to determining connection fees and collection. (example – Celebration Pointe not knowing future developments)
258.		The County requires electrical boxes to be covered and GRU needs to have clearance for ventilation from utilities for safety reasons.

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
259.		Water and gas line issues when there is no setback from the PUE.
260.		When buildings are right against watermain then GRU has to move the waterline and then causes further issues.
261.		Lacking communication between GRU and the County.
262.		Issues with getting building permits.
263.		City permits are easier to get than County Public Works permits which causes GRU to not be able to tell customer when the issue can be fixed.
264.		Look into ROW use permitting
265.		Look at standards for electric car charging stations.
266.		Look to see if any changes are needed for wellfield protection areas.
267.		Look into specific piping and pipe sizes required for water lines.
268.		In mixed-use residential there are problems with electric design. Facing is changing a lot and when have to extend electric to other buildings GRU/Developer is losing a lot of money and causes the need for more transformers.
269.		In residential development space restraints are the biggest concern.
270.		Suggest give GRU the ability to comment in development review process for phasing.
271.		Comp Plan & ULDC are too restrictive for TNDs

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
272.		Sign regulations feet & length, guidelines too restrictive need to create flexibility in the Code.
273.		Adding requirements that do not work for all areas make it hard to have affordable development with all restrictions and end up hurting the project.
274.		Having to preserve to dripline leads to more trees being taken out – counterproductive result.
275.		Tree canopy retention conflicts where open space is going. Need to line up better.
276.		Tree canopy retention works against rural cluster.
277.		TND ordinance is restrictive.
278.		The new Comp Plan is like an ULDC itself. So little that can be done in the ULDC since the Comp Plan is so restrictive.
279.		TND is going to cause all new developments to look the same.
280.		Need more flexibility for better design.
281.		Issue with sidewalk widths.
282.		Incentives are very low in TNDs
283.		Feels there is still a potential conflict with new proposed stormwater ordinance. Suggest making a variance available to have open space in stormwater retention area.
284.		Developers run from requirements in TNDs rather than developing.
285.		Tree list is extremely specific and will cause all development to look the same.

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
286.		The amount of soil borings needed are excessive for stormwater basins.
287.		There is no room for imagination in the Code.
288.		Single-family residential setbacks are good.
289.		Cottage Neighborhoods are good, great incentives, and allows for double the density.
290.		No development allowed under existing canopy. A lot of developers want to keep their trees but cannot. Look into alternative methods.
291.		Define a buildable area under existing canopies.
292.		Define a buildable lot.
293.		Semi-good: Tree calculations are consistent with method of canopy retention.
294.		Unclear on documentation for development on how often it needs to be provided to the County.
295.		Principles of Code end up in silos of pieces and are not blended like developers are striving for.
296.		Very important to have predictability, timing, and consistency.
297.		Staff should be able to approve final PDP and DRC should only be one public hearing at the beginning.
298.		Possibly reduce criteria for stormwater management
299.		Stormwater requirements cause diminishing returns.
300.		County wants more affordable housing, but Code requirements prohibit it.

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
301.		Dripline for existing tree protection is excessive and leads to more removal/mitigation.
302.		Tree canopy rules hinder density within the Urban Cluster.
303.		Open space contiguous along perimeter – need clarification and flexibility.
304.		Remove requirement in Comp Plan that all developments need to meet TND requirements.
305.		Code requires a lot of impervious area with wide sidewalks.
306.		Utilities and County Code need to be on the same page.
307.		TND does not provide for “Back of House” operations and logistics.
308.		Do not get credit for existing canopy on residential lots.
309.		Standardize mitigation costs for trees.
310.		Irrigation code – Irrigation permitting process need to clarify when it is done, process is confusing to clients.
311.		Scheduling neighborhood workshops should have more flexibility.
312.		If PDP is adopted, why does each phase have to show 20% of open space?
313.		Need to increase density for benefit of the climate.
314.		Setting limits and using direct measurement for water.

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
315.		Cottage home projects – response to affordable housing and success on density.
316.		Developers cannot find any more parcels similar to the ones needed for cottage home projects.
317.		Should be allowed to do stormwater basin without irrigation.
318.		Should have decommissioning plan for removing irrigation.
319.		Start building communities that that do not need irrigation to save on water.
320.		Meter private water wells to monitor consumption.
321.		Suggest developer pay impact fee is they exceed their limit of water and energy.
322.		Issues with DRC process – goes back and forth with client then have to take to a Public Hearing.
323.		Lack of enforcement on existing development's irrigation
324.		Will not allow a second meter for a pool and residents are forced to pay sewer fees for a pool.
325.		Fertilizer and Pesticides code is not working and is being abused.
326.		Need to look at reclaimed water exemption benefits for landscaping.
327.		It is not being followed up if replacement trees are surviving.
328.		Suggest fining people who are not following the fertilizer, pesticide, and soil codes.

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
329.		Suggest taking soil borings from utility easements and test soil borings at a lab.
330.		Parking lot Requirements: Need to think of long-term effects Trees are being placed in a hostile environment The code currently focuses on canopy not placement Need to implement incentives for saving trees in these areas
331.		Incentivize rainwater gardening installation.
332.		Propose no irrigation in backyards.
333.		Propose smaller front yards and larger backyards.
334.		Landscaping before Certificate of Completion it is hard to address the impacts. Suggestion to require a landscaping bond, Phase completion plan, and inspections after each phase.
335.		To help avoid clear cutting provide tax abatement incentive, have stricter heritage tree (i.e. Live Oak) restrictions.
336.		Placement of trees should be on sheet set and on site, suggest expanding an acceptable variety of trees, and try to keep the landscaping similar to the areas natural setting and surrounding area.
337.		Collector Roadways violate engineering minimum technical standards.
338.		Would like to see technical standards – i.e. Type of pipe, pavement design.
339.		Review how other communities are handling acceptance of roadways.
340.		Look into giving County Engineer authority to grant waivers.

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
341.		Add data references.
342.		Need clearer language for regular public access easement on private lands.
343.	Table 402.44.1	Threshold changes to table – Make changes provided by County in word document.
344.		Each community is unique. Some communities in the SW section – built and then forgotten. Seems that promises were not kept.
345.		Need to develop for gentrification
346.		Create opportunities for people to stay in their neighborhoods.
347.		Pay attention to public participation process. Not good to have private meeting notices right before the holidays, etc. This is not public engagement.
348.		Information is not easy to digest for the average citizen: 1. Streamline 2. Make user friendly – not everyone has computers 3. Can be overwhelming
349.		Suggest cut sheets/brochures for hot topic items.
350.		Biggest impediments for affordable housing: 1. Access to affordable land 2. More density in non-urban area would help facilitate access to affordable housing 3. Tree ordinance, mitigation for affordable housing can't be the cost of tree removal/study 4. Offset some of the issues with relaxed standards
351.		Long distance to services on the east side of the County – would be better to have services closer because not everyone has a vehicle.

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
352.		Consider a land bank partnership between the City & County.
353.		Need to reduce urban sprawl.
354.		Tree requirement 20% is high.
355.		Design guidelines too prescriptive.
356.		Mixed use is volatile – needs more flexibility.
357.		Maximize development within Urban Cluster to not move Cluster line – does not work with tree canopy requirements.
358.		Best open space to save often ends up being where stormwater should go. Should be a variance allowed in these situations. Absolutes make it difficult.
359.		Open space being contiguous on the perimeter is an issue. More interpretation needs to be done – cannot have a road running through it. Be careful how staff is interpreting the intent – needs to be consistent for staff.
360.		Open space requirements work fine for smaller projects, but on a 200 acre parcel a developer would still have to add more parks throughout because the rest of the project will be rooftops/asphalt. Works for 20-30 acres projects.
361.		Allow flexibility that allows a case to be made if something else works better on a given project.
362.		Open space on perimeter is to be used by the public. It is better to be placed in an area on the development take makes sense.

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
363.		Form vs. Function: Image of “perfect Block” should be removed 1. Prohibits a lot of uses because of deliveries. 2. 70% Block becomes an issue. 3. Other form-based codes address these issues better.
364.		TND standards won’t work for gas stations.
365.		TND standards are now in Comp Plan for all projects over 15 acres.
366.		Minimum density requirements in TND is hard to meet.
367.		Tree canopy cover, density, standards too stringent.
368.		Pull technical standards out of ULDC – give to public works – Ramon is reasonable and flexible.
369.		8 soil borings/acre is too demanding.
370.		Minimum Parking Requirements – On Street Parking 1. Is a maximum off-street parking requirement. 2. This incentivizes creating the street especially parallel parking.
371.		Parking really works within TND requirements.
372.		Street design works in TND – probably do not need them.
373.		TND – On all 4 sides of a block – 8’-10’ sidewalks okay where it makes sense.
374.		Wider sidewalks create more impervious area that isn’t necessary.
375.		Additional sidewalks conflict with stormwater requirements.

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
376.		GRU and County standards need to get them in sync.
377.		TND-Parallel streets internal to development with external streets, i.e. Park Place – do not make sense. - Duany A Streets and B Streets.
378.		Having the parallel street does keep parking and patrons out front.
379.		Not getting credit for preserving trees on lot.
380.		Trees on lot 400 sq. ft – single family lots.
381.		The way tree mitigation is calculated, it's consistent with message of canopy protection.
382.		Walking the site with arborists is good because it creates record.
383.		Ranking of trees could be eliminated.
384.		Cost of mitigation falls on consultant and is not well defined for consistency. Repayment for square inch should be consistent.
385.		Confusing how review of irrigation plan happens – process is not clear. Like the flexibility.
386.		Principles of what the Code is hoping to achieve is fine but end up in silos. i.e. open space over here, building over here, etc.
387.		BoCC does not need to review small projects – rely on staff. 1. Issue to allow staff more authority. 2. No more than one public hearing.
388.		Lack of definition – Phased Projects – Adopted PDP shows where open space is going to be – being asked to meet 20% open space in each phase. If it is shown on the overall it shouldn't be required by phase. (Tioga saw this issue.)

	CHAPTER/SECTION/OTHER REFERENCE	PROPOSED AREA OF CONCERN
389.		Consider the possibility of reducing criteria for stormwater – 100 year SRWMD Criteria. Has huge negative impact – highest stormwater requirement.
390.		Comprehensive Plan has FLUM Series that includes a Strategic Ecosystem Overlay. ULDC implements that to a certain extent. Consider tweaking it to allow solar facilities as a Special Exception. This can be seen as a way to bank large properties for 20+ years with no impact to the SEO. There is technology available to allow native vegetation to grow under the panels and be good for pollinators (wiregrass is a good example). Solar facilities won't be locating in wetlands so this self-regulates by not impacting wetlands. This would also help protect the County against a partial regulatory taking. Should not be a use by right because it should be reviewed for appropriateness; Special Use Permit is too subjective; Special Exception seems appropriate.
391.		Review Special Area Study section. Seems onerous on the applications. It seems it was designed to be a stop growth measure. It might be a good opportunity to create win-win situations between the County and the applicant. A third party could be at the table for conservation components. Consider it like a supped-up developer's agreement.
392.	Section 402-131	Sector plans now required to be a minimum of 5,000 (per FS 163.3245(1))
393.	Article XX – Sector Plans	Cross-check all F.S. references.