



# Alachua County – Growth Management Staff Report

## Application CPA-01-20

**Staff Contact:** Gerald L. Brewington

**Staff Phone Number:** 352-374-5249 ext. 2220

**Planning Commission Hearing Date:** February 19, 2020

**Board of County Commissioners Hearing Date:** March 24, 2020

### Project Timeline

- Staff Report Distributed: February 14, 2020
- Planning Commission: February 19, 2020
- BoCC Transmittal Hearing: March 24, 2020

### Requested Action

A request by eda, agent, for Yadda Property Holdings LLC, owner, to amend the land use designations from Institutional, Warehouse/Distribution and Office to Medium Density Residential (greater than 4-8 dwelling units per acre), Conservation and Light Industrial on approximately 92.28 acres of land on tax parcel numbers 06233-014-006 and portions of 06233-014-055 and 06233-000-000 located on NW 98<sup>th</sup> Street south of 39<sup>th</sup> Avenue.

**Property Owner:** Yadda Property Holdings I, LLC

**Applicant/Agent:** eda

### Property Description

Address: 2700 Block of NW 98<sup>th</sup> St

Parcel Number: 06233-014-005

Section/Township/Range: 30/09/19

Land Use: Institutional, Warehouse/Distribution and Office

Zoning: AP, BW, RP

Acreage: 92.28

**Previous Requests**

None

**Zoning Violation History**

None

**Staff Recommendation**

Staff recommends that the Commission transmit the proposed land use amendments to the Department of Economic Opportunity in Tallahassee for their review and comment.

**PC Recommendation**

The Planning Commission (PC) voted to recommend that the Commission transmit the proposed land use amendments to the Department of Economic Opportunity in Tallahassee for their review and comment. However, the PC amended the portion of the staff recommendation that the southern parcel boundary with Haufler Estates be Light Industrial with a 100 foot wide natural vegetative buffer. In lieu of this recommendation, the PC voted to designate this area with a Conservation land use consistent with the applicant's request.

## Background and Analysis

The applicant is requesting to amend the land use designations on the parcels identified in this request from Warehouse/Distribution, Institutional and Office to Medium Density Residential, Light Industrial and Conservation on approximately 92.28 acres of land. This request is associated with a rezoning application (ZOM-01-20).

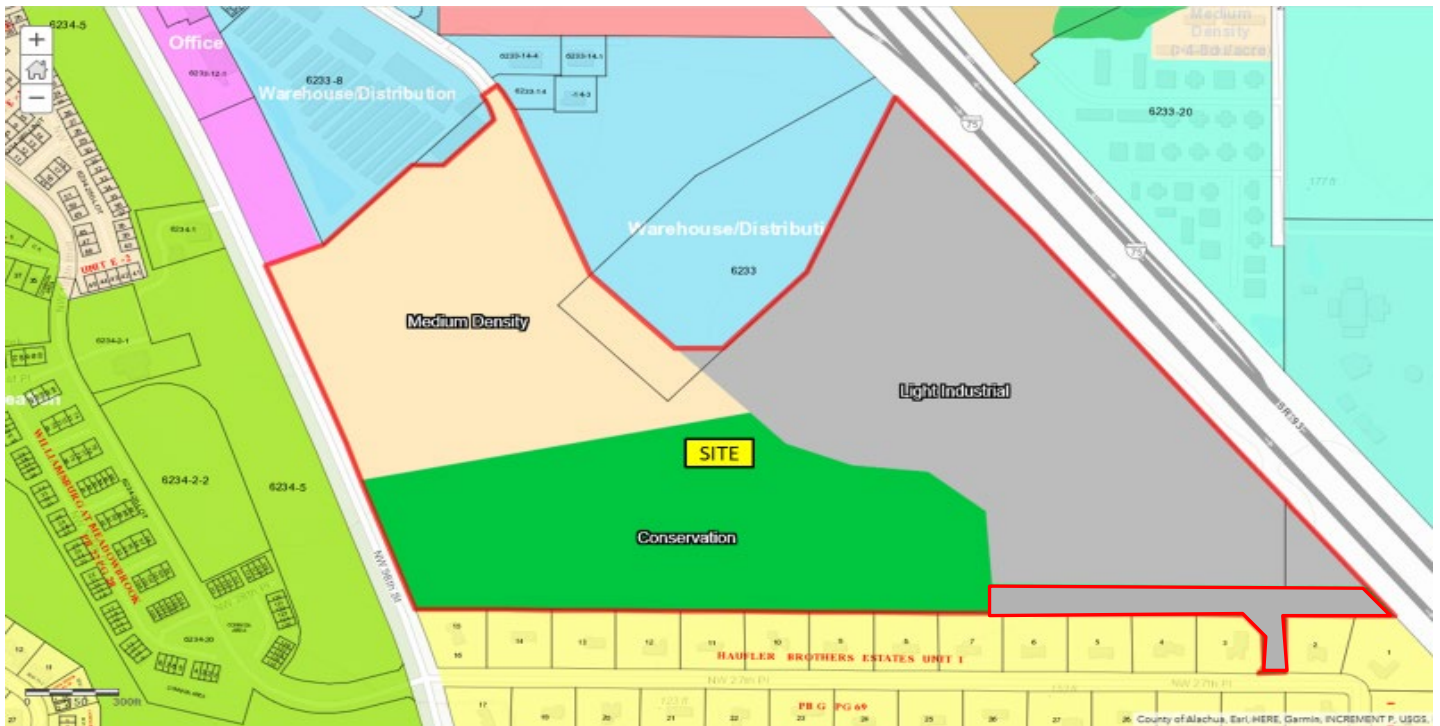
These parcels are part of the larger Springhills Activity Center although they do not lie within the Springhills Transit-Oriented Development (TOD) area. The anticipated uses with the proposed land use designations are a mix of light industrial (light manufacturing, offices and laboratories as well as warehousing), multi-family housing (with provision for other residential uses such as assisted living facilities) as well as a proposed Conservation land use designation to protect identified Significant Habitat found on the site.

While staff is supportive of the recommended changes, we cannot support the proposed Conservation land use in those areas that do not contain conservation resources (see Environmental Protection Department (EPD) comments at the end of the staff report). This area is indicated by red fill in Figure Three on Page 3 of this report. Recognizing that a buffer between non-residential and residential development mitigates potential adverse impacts, staff instead has proposed buffer language for this same area (a 100 foot wide buffer consisting of existing vegetation) that is reflected in the staff recommendations found at the end of this report. It is further recommended by staff that this area be given a Light Industrial designation similar to the property to the north in lieu of the applicant's requested Conservation land use designation.





**Figure 2 – Map Showing Applicant Proposed Land Use Amendments**



**Figure 3 – Map Showing Staff Proposed Land Use Amendments (Conservation Strip on SE Corner removed in favor of Light Industrial FLU with 100' natural vegetative buffer)**





Figure 4 – Map Showing Aerial View of Site

## **Comprehensive Plan Consistency**

The following is a staff analysis of the consistency of this application with the Alachua County Comprehensive Plan.

### **Levels of Service**

The Alachua County Comprehensive Plan Capital Improvement Element requires that the public facilities and services needed to support development be available concurrent with the impacts of development and that issuance of a Certificate of Level of Service Compliance (CLSC) be a condition of all final development orders. ‘Concurrent’ shall mean that all adopted levels of service (LOS) standards shall be maintained or achieved within a specified timeframe. Per **Policy 1.2.4 and Policy 1.2.5 of the Capital Improvements Element** of the Alachua County Comprehensive Plan, LOS standards have been adopted for various types of public facilities.

### **Traffic**

Any residential or non-residential development on the site will require mitigation through the Multi-Modal Transportation Mitigation (MMTM) fee program.

### **Water and Sewer**

**Policy 1.2.4 (d) of the Capital Improvements Element** describes the minimum Level of Service standards for potable water and sewer. These are summarized in the following table:

	Peak Residential & Non Residential	Pressure	Storage Capacity
Potable Water	200 gallons/day/du	40 p.s.i.	½ peak day volume
Sanitary Sewer	106 gallons/day/du	N/A	N/A

There will be no impacts to water and sewer levels of service resulting from this request. The site will be served by municipal water and sewer service.

### **Drainage**

**Policy 1.2.4 (c) of the Capital Improvements Element** states that the minimum drainage LOS standard for non-residential development requires a floor elevation of one (1) foot above the 100-year/critical duration storm elevation or flood resistant construction. Any future development on this site will be required to meet this standard.

### **Emergency Services**

**Policy 1.2.5 (a) of the Capital Improvements Element** states that the LOS standard for fire services in the area inside the urban cluster is as follows:

- Initial unit response within 6 minutes for 80% of all responses within 12 months.
- The Land Development Regulations shall require that 100% of all development shall provide water supply served by hydrants.

All development will be required to meet these standards at the time of development plan approval.

### **Solid Waste**

The level of service (LOS) standard for solid waste disposal, used as the basis for determining availability of disposal capacity to accommodate the demand generated by existing and new development in Alachua County, is at a minimum, at 0.8 inbound tons per person per year at the Leveda Brown Environmental Park in 2018 and thereafter.

### **Schools**

The uniform, district-wide LOS standards shall be 100% of Program Capacity [see definition] for elementary, middle and high schools. This LOS standard shall apply to all concurrency service areas (CSA) as adopted in the Interlocal Agreement. These LOS standards shall be applied to School Concurrency Service Areas (SCSAs) as specified in the Public School Facilities Element. Public school facilities will be evaluated at the time of development plan review.

### **Recreation**

Recreation LOS Standards: The County shall adopt and maintain, at a minimum, the following level of service standards for recreation of: (1) 0.5 acres of improved activity-based recreation sites per 1000 persons in the unincorporated area of Alachua County; (2) 5.0 acres of improved resource-based recreation

sites per 1000 persons in the unincorporated area of Alachua County. Adopted LOS standards will not be exceeded by this request.

## **Future Land Use**

**Policy 1.3.8.2(a) (Urban Residential Policies)** states that *Multi family residential development outside a TND or TOD in the Medium Density Residential land use category shall have direct access to an arterial or collector (road) or alternate access if the access meets the following requirements and is approved by the Board of County Commissioners...*

The proposed Medium Density Residential land use designation found in the application is immediately adjacent to NW 98<sup>th</sup> Street, a local collector road. Any proposed development on this site will have direct access to this facility, consistent with this policy.

**Policy 1.3.8.4 (Urban Residential Policies)** states that *Medium density residential areas shall be located in the urban cluster.*

The proposed Medium density residential land use is located in the urban cluster, consistent with this policy.

**Policy 2.1.4 (Urban Activity Center Policies) of the Future Land Use Element** states that *a mixture of residential and non-residential land uses shall be provided in activity centers to reduce travel distances between different types of land uses and support pedestrian, bicycle and transit opportunities.* The proposed land use requests provide both residential (Medium Density Residential) and non-residential (Light Industrial) land use designations within the activity center boundaries, consistent with this policy. Numerous commercial properties are located in the activity center, primary in the northeast and southeast quadrants including restaurants, grocery shopping, banking and convenience stores. The allowance for residential development within the activity center boundaries promotes proximate and easy access to these establishments. The provision for light industrial development also provides for employment opportunities for nearby residential development.

**Policy 2.2.1(a)(1)a (Springhills Activity Center Policies) of the Future Land Use Element** states that *the Springhills Activity Center shall be designated a High Activity Center/Retail which shall have commercial activities as its primary use and office, **residential, warehouse/distribution** and institutional as secondary uses providing they are compatible with primary uses. The scale of these activities may be at a regional level of 300,000 – 1,000,000 square feet of gross leasable area.*

The proposed land use designations allow residential and light industrial uses per this section of the Plan. These uses are similar to those already found in this quadrant of the activity center (i.e. warehouses located immediately to the north of the proposed rezoning) or that are compatible by nature of their location with these uses (multi-family residential/assisted living adjacent to NW 98<sup>th</sup> Street). The location of the proposed Conservation land use on the south portion of the site as well as the provision for a 100 wide buffer vegetative buffer along the north boundary of Haufler Estates single family subdivision to the south provides a transition area between the proposed uses and existing residential development.

**Policy 4.1.1 (Industrial Policies) of the Future Land Use Element** states that *Industrial development shall be located in the urban cluster with the following limited exceptions...*

The proposed new Industrial land use designation is located within the Springhills Activity Center, which is located within the Urban Cluster, consistent with this policy.

**Policy 4.1.2 (Industrial Policies) of the Future Land Use Element states that** *a range of choice in land areas and locations for the different types of industry shall be provided to meet the anticipated expansion of industry in the County and to meet the objectives of the Economic Element of this Plan. Sufficient area for industrial land use shall be identified in appropriate locations on the Future Land Use Map in an effort to create a supply of land which has the proper zoning already in place, which is therefore immediately available for such uses. The County has identified a number of potential locations with suitable infrastructure, including parcels with rail access, **interstate access**, or proximity to cargo terminals, and suitable environmental characteristics for such uses.*

The parcels proposed for light industrial land use designation are immediately adjacent to the I-75 corridor, consistent with this policy of the Future Land Use Element.

**Policy 4.1.3 (Industrial Policies) of the Future Land Use Element states that** *Industrial locations and proposed uses shall be consistent with the Conservation and Open Space Policies of Alachua County.*

The proposed land use amendment will be consistent with all provisions of the Conservation and Open Space Element (COSE) of the Plan. The larger project site (92.28 acres) includes a 25% set aside of significant habitat that will receive a Conservation land use designation as part of this proposed amendment.

**Policy 4.1.4 (Industrial Policies) of the Future Land Use Element states that** *Industrial operations shall meet the performance standards established in the Unified Land Development Code in order to eliminate or, where possible, minimize impacts on public health and the environment.*

Any proposed development will undergo development plan review and will be required to meet all ULDC standards to mitigate or minimize potential impacts to surrounding development as required.

**Policy 4.2.1 (Industrial Policies) of the Future Land Use Element states that** *Industrial uses shall not be located adjacent to residential or agricultural areas without adequate buffering or integrating design and business practices to eliminate or minimize adverse impacts. Land use decisions concerning location of industrial uses shall take into consideration environmental justice.*

As part of the overall land use amendment for these parcels, a conservation area (with Conservation land use designation) is proposed along the southern parcel boundary adjacent to Haufler Estates (a single family residential community). In addition, staff are proposing text language within the Springhills Activity Center policies that would require a 100 foot wide natural vegetative buffer between the proposed Industrial land use and Haufler Estates, consistent with this policy.

**Policy 4.6.1 (Industrial Policies) of the Future Land Use Element states that** *Industrial development shall be located only in areas where adequate facilities and services exist or will be provided prior to occupancy. These facilities include, but are not limited to:*

- (a) roadways.*
- (b) fire service.*
- (c) water supply.*
- (d) street lighting.*



- (e) solid waste collection and disposal.*
- (f) sewage collection and disposal.*
- (g) storm water drainage and disposal.*
- (h) emergency medical service.*

The proposed location of the light industrial land use area is properly served by each of the necessary urban services and facilities described above. Level of Service standards found in the Plan will not be adversely impacted by the proposed land use amendment to Light Industrial.

**Policy 4.6.2 (Industrial Policies) of the Future Land Use Element states that** *New industrial development shall meet all of the requirements for adequate facilities based on the level of service standards for those facilities and concurrency provisions of the Plan.*

The proposed location of the light industrial land use area is properly served by each of the necessary urban services and facilities described above. Level of Service standards found in the Plan will not be adversely impacted by the proposed land use amendment to Light Industrial.

## **Conservation and Open Space Element**

**Objective 3.1 (Conservation Land Use Categories) of the Conservation and Open Space Element states that** *A conservation land use category shall be established to recognize and protect natural resources within privately owned lands in Alachua County utilizing appropriate regulatory, acquisition, and incentive mechanisms. Also, Policy 3.1.1 of the Conservation and Open Space Element states that Conservation areas shall consist of natural resources that, because of their ecological value, uniqueness and particular sensitivity to development activities, require stringent protective measures to sustain their ecological integrity. These areas shall include:*

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

The primary portion of the proposed Conservation land use area was mapped as an environmentally sensitive area, specifically identified as significant upland habitat. This land characteristic is appropriate for designation as conservation land use. Staff has recommended additional policy language within the Springhills Activity Center Policies to ensure that the full 25 percent upland protection policies of the planning parcel are carried through the development review process consistent with Unified Land Development Code Sec. 406.21(a).

**Policy 3.1.3 of the Conservation and Open Space Element states that** *Conservation areas shall be developed only in a manner consistent with protection of the ecological integrity of natural resources, and in accordance with standards which are outlined subsequently in this Element.*

The proposed Conservation land use area will provide appropriate permanent protection as deemed appropriate during subsequent development plan proposals. Examples of permanent protection include designations as Open Space on Development Plan or Conservation Easements.

## **Effect of the Proposed Amendments on Affordable Housing**

The proposed land use amendments will have no impact on the initial cost of housing, the long term cost of home ownership nor will there be any fiscal impacts to Alachua County or its taxpayers.

### **Staff Recommendation**

Staff recommends that the land use amendments be transmitted to the Department of Economic Opportunity (DEO) in Tallahassee for their review and comment with the bases and amended Comprehensive Plan language cited below (excised language is denoted with a ~~strickethrough~~ while new language is denoted with an underline):

## **Proposed Text Amendments (Future Land Use Element – Springhills Activity Center Policies)**

### *Policy 2.2.1 Activity Center Plan – Springhills*

#### *(a) Land Use*

*(1) Commercial mixed uses should be limited to the areas designated on the Activity Center Plan Map and shopping center should be developed in accordance with the standards of Sections 3.5, 3.6. and 3.7. of the Future Land Use Element. Tourist and entertainment areas shown on the Plan map should be restricted to retail commercial activities associated with a transient clientele. Limited retail and service commercial uses should be permitted in warehouse and distribution areas and in office areas where such retail uses are clearly accessory to and related to the principal uses or where the retail uses are provided to serve the businesses and employees within the development. Such retail uses shall be located internal to the development with no exposure outside the development being served. Floor area ratios (FAR) for office, warehouse/distribution and commercial uses shall not exceed 1.0 except as otherwise established herein.*

- a. The Springhills Activity Center shall be designated a High Activity Center/Retail which shall have commercial activities as its primary use and office, residential, warehouse/distribution, light industrial and institutional as secondary uses providing they are compatible with primary uses. The scale of these secondary activities may be at a regional level of 300,000 - 1,000,000 sq. ft. gross leasable area or more.*

~~*(7) The area identified as institutional in the southwest quadrant shall permit institutional or residential land uses according to the policies and standards contained in the Plan.*~~

*(7) The undeveloped portions of the southwest quadrant with Medium Density Residential, Warehouse/Distribution, Light Industrial and Conservation future land use designations shall be master planned and will include the following:*

- (a) Approval of the site as one Preliminary Development Plan (PDP) with allowance for multiple phases /Final Development Plan submittals in compliance with the PDP*
- (b) Provision of centralized open space based on site environmental characteristics, including a Conservation Management Area (CMA) management plan*
- (c) Master-planned stormwater facilities serving the entire project (spanning over multiple land use districts)*

**(d) No fewer than two fully functioning access points on different sides of the development shall be provided. Specific access point locations shall be determined during development plan review.**

**(e) Application of a 100-foot natural vegetative buffer along the southern property line of parcel 06233-014-005 except for transportation facility connections.**

**(f) Exemption from Activity Center design requirements (Policies 2.1.4 – 2.1.12) related to development in the Warehouse / Distribution and Light Industrial future land use areas.**

**(g) Exemption from TND requirements for development within the Warehouse / Manufacturing and Light Industrial future land use areas and Medium Density Residential future land use area for development under 150 units.**

(8) The development standards for the Warehouse/Distribution area in the southwest quadrant shall be as follows:

a. Lots fronting on N.W. 97th Boulevard ~~or NW 97th Court extension~~ shall have a front setback of 25 feet.

b. All uses developed in this area shall have a maximum Floor Area Ratio of .35 to 1.

(9) The following buffers shall be required:

a. A buffer shall be maintained along the I-75 right-of-way, at depths to be determined on a site-by-site basis by ~~the Board of County Commissioners~~ **the applicable development review body** and shall provide visual and acoustical separation.

b. All the non-residential land lying within the Activity Center abutting residential land lying outside the Activity Center shall maintain a buffer of at least 50 feet. As it pertains to the southern ~~50-foot~~ buffer of the Southwest Quadrant, between the ~~Light Industrial Warehouse and Institutional~~ land uses within the Activity Center and the residential area located outside the Activity Center, **a 100-foot natural vegetative buffer shall be required along the southern property line of parcel 06233-014-005. the DRC shall evaluate the need for a larger buffer between these areas at such time as the property within the Activity Center is presented for site plan review.**

c. The ~~Institutional area and the~~ Office area along Northwest 98th Street in the southwest quadrant shall have a buffer of at least ~~25~~ **20** feet, except for ingress/egress points.

(10) No parking, storage, trash receptacles, or mechanical or utility equipment may be located between any building and I-75, unless approved with appropriate screening on a site-by-site basis during development review. Only one **freestanding** sign identifying the property in question may be located between any building and I-75, ~~or may be attached to any building facing I-75. with the exception of a second freestanding sign allowed if the related project has in excess of 500 linear feet of frontage along I-75.~~ More than one sign may be attached to a **shopping center non-residential building** facing I-75 if approved on a site-by-site basis during development review. In administering these buffer standards or requiring additional buffering, the Development Review Committee and the Board of County Commissioners shall consider the need for visual and acoustical separation for residential use and noise attenuation and shall consider the effectiveness of existing vegetation.

(11) Conservation areas shown on the Activity Center Land Use Plan are not to scale. These areas shall be field-located at the time of development review.

(12) The conservation area separating single-family residential land use from Warehouse/Distribution uses in the northeast quadrant shall be treated as an overlay district. This property may contain environmentally sensitive areas. During site plan review, the applicant shall be required to submit plans, soil borings, and other necessary information to determine if there are any environmentally sensitive areas. If so found, these areas shall remain designated Conservation. If not, development may occur utilizing the normal buffer requirements.

**~~(13) Development of Regional Impact (DRI) approved after the effective date of Ordinance 90-3 shall be consistent with the adopted Alachua County Comprehensive Plan.~~**

(13) An additional 2.4 acres shall be set aside within a Conservation Management Area contiguous with the Conservation Future Land Use in the Southwest Quadrant (Parcel 06233-014-005). This area shall be determined during the Development Review Process.

(14) The Activity Center concept is intended to incorporate a broad mixture of uses under specific design standards approved by the Board of County Commissioners.

**(b) Transportation**

(2) Access to 39th Avenue, ~~98th Street~~, and 91st Street shall be limited to the points indicated on the Activity Center Plan map. Existing development (i.e.: entrances approved as of December 1, 1984), may continue to have other access to these roads, but shall provide for alternate access in the event the property is redeveloped or the use of the property is expanded beyond that which existed on December 1, 1984. Alternative access shall include access through the internal street system or using frontage roads or service drives or other appropriate internal access. Any new development or redevelopment of parcels currently having direct access shall include provision of service drives. Any development of parcels lying between such parcels and ultimate access points shall provide for service drives or other alternative access. It is the intent of this Activity Center Plan that medians be constructed along 39th Avenue at least between 98th Street and 83rd Street and that the number of points at which median cuts are permitted be strictly limited, with consideration of projected traffic volumes and land uses within the Activity Center.

(3) ~~Direct access may be permitted to 98th Street, but shall be limited to one access point every 400 feet. Where necessary, individual parcels shall share access with adjoining parcels.~~ **Direct access may be permitted to NW 98th Street in accordance with Alachua County Access Management Standards and as permitted during development plan review**

**~~(8) The alignment of the NW 97th Court extension and the access roads to the Institutional area in the southwest quadrant shown on the Activity Center Plan Map are tentative only; actual alignments shall be determined by the Development Review Committee and redrawn on the Activity Center Map. All development within the southwest quadrant shall be interconnected to provide for pedestrian and vehicular circulation. Appropriate access points onto existing transportation facilities shall be evaluated during the development review process. The undeveloped portion of the southwest quadrant shall provide for no fewer than two fully functional access points on different sides of the development.~~**

~~(9) The transportation system within the site shall be developed in an interconnected manner to the maximum extent feasible. The internal transportation system shall be stubbed out to allow access and interconnections with adjacent properties both within and outside the DRI boundary. The~~

~~transportation system shall be designed so that multiple roads, bike paths and sidewalks can continue into any adjacent development in an effort to integrate adjacent properties and limit the impacts to the arterial roadway system. The exact number and location of streets, paths and sidewalks to be stubbed out will be determined during the site plan approval process. The transportation system within the site shall be developed in an interconnected manner to the maximum extent feasible. The internal transportation system shall be stubbed out to allow access and interconnections with adjacent properties both within and outside the Activity Center boundary. The transportation system shall be designed so that multiple roads, bike paths and sidewalks can continue into any adjacent development in an effort to integrate adjacent properties and limit the impacts to the arterial and collector roadway system. The exact number and location of streets, paths and sidewalks to be stubbed out will be determined during the development plan approval process. Where connecting to existing roadways, appropriate access management techniques and traffic calming shall be utilized to ensure continued safe operation of existing local, collector and arterial roadways.~~

**(d) Implementation**

~~(1) Use of the PD zoning category for each quadrant with an overall conceptual zoning master plan shall be required for the entire Springhills Development of Regional Impact (DRI) area in order to provide adequate buffer areas, sign and landscaping controls, and to ensure consistency with the intent of the Activity Center Plan. The Master Plan shall address the overall traffic circulation system, pedestrian and bicycle paths and circulation, mass transit accommodations, stormwater management, open space/recreation areas, conservation areas, and utility provisions, in a manner consistent with the Alachua County Board of County Commissioners adopted Design Standards for the DRI.~~



## **Bases**

**1. Policy 1.3.8.2(a) (Urban Residential Policies)** states that *Multi family residential development outside a TND or TOD in the Medium Density Residential land use category shall have direct access to an arterial or collector (road) or alternate access if the access meets the following requirements and is approved by the Board of County Commissioners...*

The proposed Medium Density Residential land use designation found in the application is immediately adjacent to NW 98<sup>th</sup> Street, a local collector road. Any proposed development on this site will have direct access to this facility, consistent with this policy.

**2. Policy 1.3.8.4 (Urban Residential Policies)** states that *Medium density residential areas shall be located in the urban cluster.*

The proposed Medium density residential land use is located in the urban cluster, consistent with this policy.

**3. Policy 2.1.4 (Urban Activity Center Policies) of the Future Land Use Element** states that *a mixture of residential and non-residential land uses shall be provided in activity centers to reduce travel distances between different types of land uses and support pedestrian, bicycle and transit opportunities.* The proposed land use requests provide both residential (Medium Density Residential) and non-residential (Light Industrial) land use designations within the activity center boundaries, consistent with this policy. Numerous commercial properties are located in the activity center, primary in the northeast and southeast quadrants including restaurants, grocery shopping, banking and convenience stores. The allowance for residential development within the activity center boundaries promotes proximate and easy access to these establishments. The provision for light industrial development also provides for employment opportunities for nearby residential development.

**4. Policy 2.2.1(a)(1)a (Springhills Activity Center Policies) of the Future Land Use Element** states that *the Springhills Activity Center shall be designated a High Activity Center/Retail which shall have commercial activities as its primary use and office, **residential, warehouse/distribution** and institutional as secondary uses providing they are compatible with primary uses. The scale of these activities may be at a regional level of 300,000 – 1,000,000 square feet of gross leasable area.*

The proposed land use designations allow residential and light industrial uses per this section of the Plan. These uses are similar to those already found in this quadrant of the activity center (i.e. warehouses located immediately to the north of the proposed rezoning) or that are compatible by nature of their location with these uses (multi-family residential/assisted living adjacent to NW 98<sup>th</sup> Street). The location of the proposed Conservation land use on the south portion of the site as well as the provision for a 100 wide buffer vegetative buffer along the north boundary of Haufler Estates single family subdivision to the south provides a transition area between the proposed uses and existing residential development.

**5. Policy 4.1.1 (Industrial Policies) of the Future Land Use Element** states that *Industrial development shall be located in the urban cluster with the following limited exceptions...*

The proposed new Industrial land use designation is located within the Springhills Activity Center, which is located within the Urban Cluster, consistent with this policy.

**6. Policy 4.1.2 (Industrial Policies) of the Future Land Use Element states that** *a range of choice in land areas and locations for the different types of industry shall be provided to meet the anticipated expansion of industry in the County and to meet the objectives of the Economic Element of this Plan. Sufficient area for industrial land use shall be identified in appropriate locations on the Future Land Use Map in an effort to create a supply of land which has the proper zoning already in place, which is therefore immediately available for such uses. The County has identified a number of potential locations with suitable infrastructure, including parcels with rail access, **interstate access**, or proximity to cargo terminals, and suitable environmental characteristics for such uses.*

The parcels proposed for light industrial land use designation are immediately adjacent to the I-75 corridor, consistent with this policy of the Future Land Use Element.

**7. Policy 4.1.3 (Industrial Policies) of the Future Land Use Element states that** *Industrial locations and proposed uses shall be consistent with the Conservation and Open Space Policies of Alachua County.*

The proposed land use amendment will be consistent with all provisions of the Conservation and Open Space Element (COSE) of the Plan. The larger project site (92.28 acres) includes a 25% set aside of significant habitat that will receive a Conservation land use designation as part of this proposed amendment.

**8. Policy 4.1.4 (Industrial Policies) of the Future Land Use Element states that** *Industrial operations shall meet the performance standards established in the Unified Land Development Code in order to eliminate or, where possible, minimize impacts on public health and the environment.*

Any proposed development will undergo development plan review and will be required to meet all ULDC standards to mitigate or minimize potential impacts to surrounding development as required.

**9. Policy 4.2.1 (Industrial Policies) of the Future Land Use Element states that** *Industrial uses shall not be located adjacent to residential or agricultural areas without adequate buffering or integrating design and business practices to eliminate or minimize adverse impacts. Land use decisions concerning location of industrial uses shall take into consideration environmental justice.*

As part of the overall land use amendment for these parcels, a conservation area (with Conservation land use designation) is proposed along the southern parcel boundary adjacent to Haufler Estates (a single family residential community). In addition, staff are proposing text language within the Springhills Activity Center policies that would require a 100 foot wide natural vegetative buffer between the proposed Industrial land use and Haufler Estates, consistent with this policy.

**10. Policy 4.6.1 (Industrial Policies) of the Future Land Use Element states that** *Industrial development shall be located only in areas where adequate facilities and services exist or will be provided prior to occupancy. These facilities include, but are not limited to:*

- (a) roadways.*
- (b) fire service.*
- (c) water supply.*
- (d) street lighting.*
- (e) solid waste collection and disposal.*
- (f) sewage collection and disposal.*

*(g) storm water drainage and disposal.*

*(h) emergency medical service.*

The proposed location of the light industrial land use area is properly served by each of the necessary urban services and facilities described above. Level of Service standards found in the Plan will not be adversely impacted by the proposed land use amendment to Light Industrial.

**11. Policy 4.6.2 (Industrial Policies) of the Future Land Use Element states that** *New industrial development shall meet all of the requirements for adequate facilities based on the level of service standards for those facilities and concurrency provisions of the Plan.*

The proposed location of the light industrial land use area is properly served by each of the necessary urban services and facilities described above. Level of Service standards found in the Plan will not be adversely impacted by the proposed land use amendment to Light Industrial.

**12. Objective 3.1 (Conservation Land Use Categories) of the Conservation and Open Space Element states that** *A conservation land use category shall be established to recognize and protect natural resources within privately owned lands in Alachua County utilizing appropriate regulatory, acquisition, and incentive mechanisms. Also, Policy 3.1.1 of the Conservation and Open Space Element states that Conservation areas shall consist of natural resources that, because of their ecological value, uniqueness and particular sensitivity to development activities, require stringent protective measures to sustain their ecological integrity. These areas shall include:*

*(a) Wetlands;*

*(b) Surface waters;*

*(c) 100-year floodplains;*

*(d) Listed species habitat;*

*(e) Significant geologic features; and*

*(f) Strategic ecosystems.*

The primary portion of the proposed Conservation land use area was mapped as an environmentally sensitive area, specifically identified as significant upland habitat. This land characteristic is appropriate for designation as conservation land use. Staff has recommended additional policy language within the Springhills Activity Center Policies to ensure that the full 25 percent upload protection policies of the planning parcel are carried through the development review process consistent with Unified Land Development Code Sec. 406.21(a).

**13. Policy 3.1.3 of the Conservation and Open Space Element states that** *Conservation areas shall be developed only in a manner consistent with protection of the ecological integrity of natural resources, and in accordance with standards which are outlined subsequently in this Element.*

The proposed conservation land use area will provide appropriate permanent protection as deemed appropriate during subsequent development plan proposals. Examples of permanent protection include designations as Open Space on Development Plan or Conservation Easements.

## **Staff and Agency Comments**

**Department of Public Works:** No comments

### **Transportation Planning:**

#### **Trip Generation**

The range of potential uses for the site under both the existing and proposed future land use designations varies greatly. The applicant has provided an analysis of potential development scenarios under both the existing and proposed conditions, and Staff supports that analysis. However, the potential maximum development scenarios were not analyzed in the application. In the following analysis, FAR means Floor Area Ratio, or the ration of building area to property size. A maximum of 1.0 FAR is provided for in the policies related to this area. In order to analyze the maximum development scenario for the Institutional, a scenario was used that includes a high school on a portion of the property, and a Place of Worship. Each of the sizes was determined utilizing facilities in and around Gainesville. Under the existing future land use designations and limitations in the comprehensive plan, the maximum trip generation would be:

- Office Future Land Use (1.88 acres @ FAR of 1.0) - (ITE 710 - General Office @ 81.8 ksf) 865 daily trips
- Warehouse/Distribution (39.12 acres @ FAR of 1.0) - (ITE 130 Industrial Park @ 1,704 ksf) 4,102 daily trips
- Institutional
  - High School (210 ksf based on local analysis) 2,955 daily trips
  - Place of Worship (75 ksf based on local analysis) (ITE 560 Church) 478 daily trips
- Total Daily Trip Generation – 8,400 ADT

The proposed scenario is analyzed based on the same maximum FAR as the existing scenario. In addition, the proposed limitation on Traditional Neighborhood Development was taken into account.

- Light Industrial (38.43 acres @ FAR of 1.0) - (ITE 130 Industrial Park @ 1,674 ksf) 4,064 daily trip
- Medium Density Residential (4-9 du/ac = 197 units) (ITE 220 MF Low Rise @ 197 units) 1,448 daily trips
- Total Daily Trip Generation – 5,512 ADT

Based on this analysis, the proposed future land use designations and comprehensive plan policies would result in a reduction in trip generation.

#### **Text Analysis**

The applicant is proposing new language (Policy 2.2.1(a)(7)(c)) that would limit the number of access points for the property to two (2). In addition, the proposed Policy dictates the location of those connections as NW 97<sup>th</sup> Blvd and NW 98<sup>th</sup> Street. However, this seems to be inconsistent with the proposed Policy 2.2.1(b)(8) that proposes two access point on NW 98<sup>th</sup> Street. Staff is generally support of additional access points on NW 98<sup>th</sup> Street as it will reduce the number of turning movement at any single access point and likely create better traffic flow on NW 9<sup>th</sup> Street. However, given that there is substantial uncertainty about the layout of any development on the site, it would be better to use the County's existing Access Management criteria to determine where and how many connection points should be provided.

Proposed Policy 2.2.1(a)(7)(c) also specifically precludes connection to the south to the Haufler Brother's Estate Unit No. 1 subdivision. As originally platted, a future roadway was envisioned between lots 2 and 3 of the plat. Additionally, proposed Policy 2.2.1(b)(9) precludes connection to the subdivision to the south by indicating that no transportation system connections shall be constructed within the conservation land use areas. This would be understood to also mean that no alternative transportation connections could be made, such as sidewalks, multi-use paths or transit-only connections. This concept is generally inconsistent with existing Policy 1.1.8 which requires connection to adjacent stub-outs when provided. Reduced connections will result in increased traffic on collector and arterial streets, such as NW 23<sup>rd</sup> Avenue and NW 98<sup>th</sup> Street as users are required to utilize these roads to go from one development to another. Additionally, the prohibition of bicycle and pedestrian connection to the south as proposed is inconsistent with Policy 1.1.8(f) that requires bicycle and pedestrian circulation that connects to adjacent development.

Based on the above comments, Staff would propose the following changes to the policies as proposed in the application.

2.2.1(a)(7)(c) "No fewer than two fully function access points on different sides of the development shall be provided. Specific access point locations shall be determined during development plan review."

2.2.1(a)(7)(e) should no longer reference Warehouse / Distribution as this area is being changed to Light Industrial.

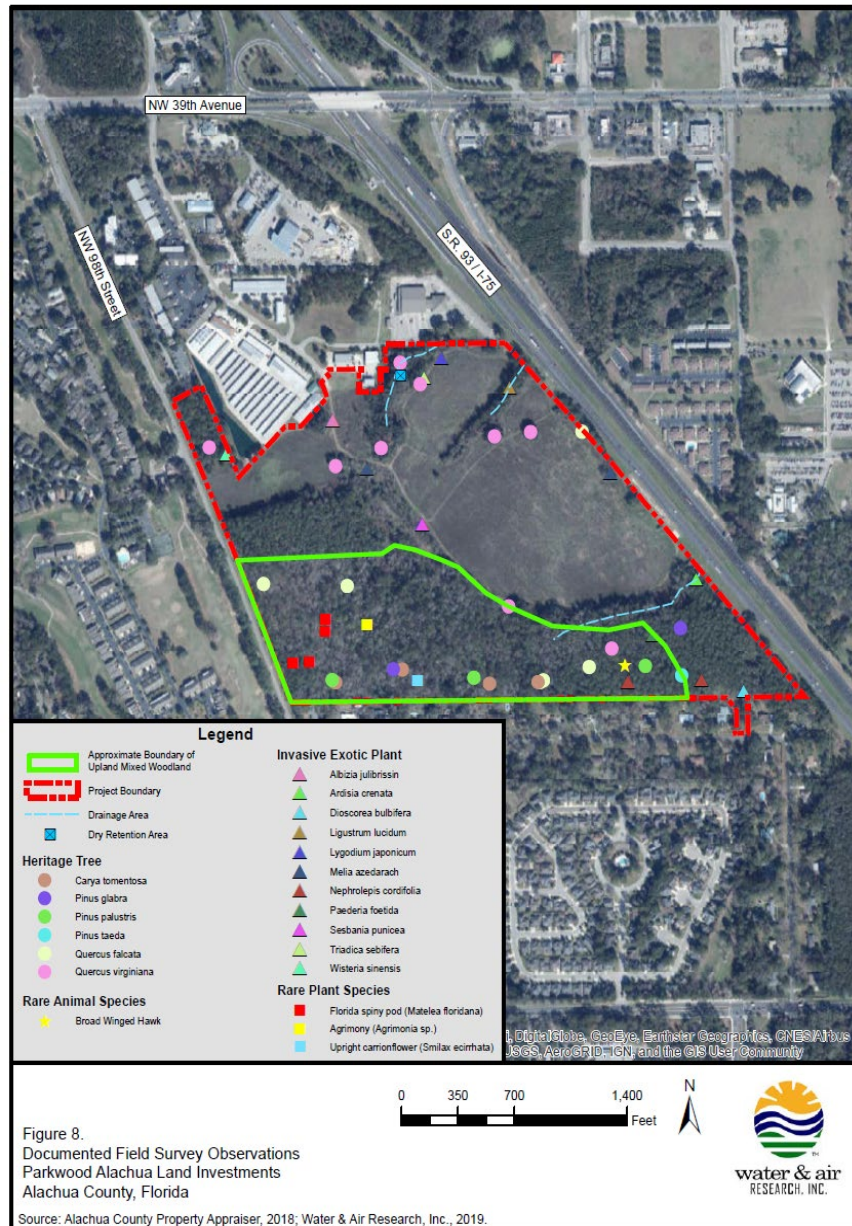
2.2.1(b)(3) "Direct access may be permitted to NW 98<sup>th</sup> Street in accordance with Alachua County Access Management Standards and as permitted during development plan review."

2.2.1(b)(8) "All development within the southwest quadrant shall be interconnected to provide for pedestrian and vehicular circulation. Appropriate access points onto existing transportation facilities shall be evaluated during the development review process. The undeveloped portion of the southwest quadrant shall provide for no fewer than two fully functional access points on different sides of the development."

2.2.1(b)(9) "The transportation system within the site shall be developed in an interconnected manner to the maximum extent feasible. The internal transportation system shall be stubbed out to allow access and interconnections with adjacent properties both within and outside the Activity Center boundary. The transportation system shall be designed so that multiple roads, bike-paths and sidewalks can continue into any adjacent development in an effort to integrate adjacent properties and limit the impacts to the arterial and collector roadway system. The exact number and location of streets, paths and sidewalks to be stubbed out will be determined during the development plan approval process. Where connecting to existing roadways, appropriate access management techniques and traffic calming shall be utilized to ensure continued safe operation of existing local, collector and arterial roadways."



## Department of Environmental Protection:



The subject site (116 acres) was evaluated during May, 2019 by two environmental staff employed by Water & Air Research, Inc. (W&AR). Their evaluation reported that within the 38-acre area delineated as “Upland Mixed Woodland” (right aerial, green boundary), “a portion of this natural community type may qualify as significant habitat based on the size and age of the dominant canopy tree species, wildlife habitat value, and the presence of listed and uncommon species.”

This documentation was followed by joint site evaluation conducted within the delineated area by the same staff from W&AR as well as EDA, ACGM and ACEPD. The results of the preliminary evaluation concluded the area qualifying as significant habitat did not extend as far southeast as depicted within the aerial, and the northwestern limits would require additional evaluation including survey of regulated trees within the most northern 200 ft. wide perimeter of the woodland area (page 2, top figure). The results of the tree survey confirmed the northern extent of the significant habitat was approximately the same boundary as depicted by W&AR. As a result, evaluation indicated that of the 38 acres within the



woodland area, an estimated 32.6 acres would be appropriately classified as significant habitat (delineated in purple, page 2 aerial).



## Conceptual Development Plan

Areas designated as significant habitat are very rare and unique within Alachua County, and as a result, there are very few development projects proposed within property that actually have the presence of significant habitat. Thorough evaluation of various design alternatives to avoid and minimize encroachment into these habitats are critical steps necessary for engineering design consultants. The only concept plan presented by EDA (right figure) was cross-referenced with the delineation of significant habitat and depicted on the aerial below. If implemented as proposed, the conceptual plan could result in removing an estimated six acres of significant habitat within the northwest area as well as some additional regulated trees north of the delineated habitat area. Minor modification of the delineated southeastern stormwater basin would result in avoiding encroachment within the significant habitat area (figure above), which has probably been revised since the area is now proposed for conservation land use.

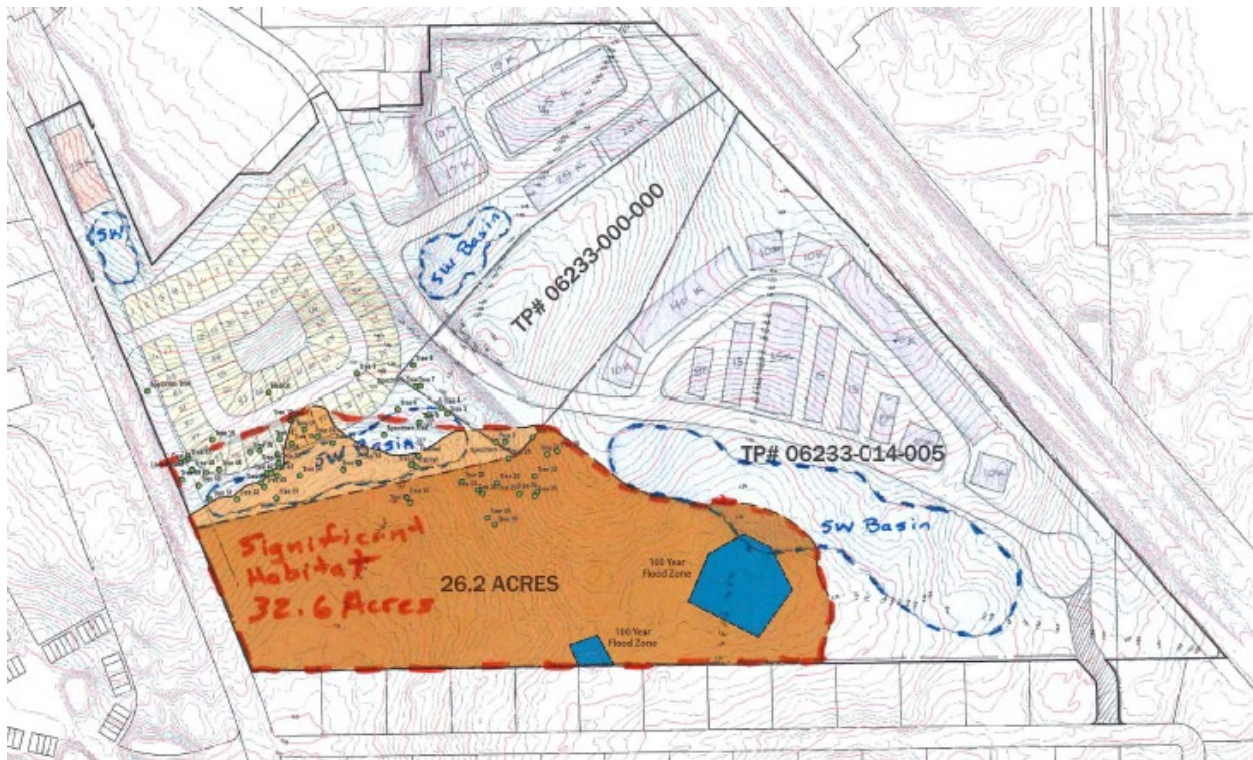
In July, staff from EDA, ACGM and ACEPD met to discuss the conceptual plan for the property. In the meeting, County staff expressed concerns and associated issues that would require additional evaluation and design considerations to adequately and appropriately demonstrate that reasonable alternatives would be considered and incorporated into the design. The following summarize these concerns and issues:

- At 116 acres, this is a substantially large tract with approximately half previously cleared of native habitat. Considering approximately 32 acres of significant habitat is contiguous and concentrated within the southwestern portion, no presence of wetland resources and the two small 100-year



flood zone areas are embedded in the significant habitat, this much available acreage would support multiple design options to achieve desired industrial and residential development goals while still protecting significant habitat.

- There were no surface and storm water modeling or design options presented to verify evaluation of stormwater treatment facilities or alternatives. As depicted on the concept plan, the proposed stormwater basin location for the northwest residential area would result in the majority of the encroachment into the significant habitat area. Contours for the site indicate sufficient locations for alternative designs to minimize and possibly avoid this encroachment by conveying stormwater to other locations, such as enlarging the proposed industrial stormwater basin and incorporating surface water attenuation into the significant habitat area. This could reduce the acreage necessary for basins while retaining surface/storm water attenuation that has been and currently being provided in the significant habitat area.



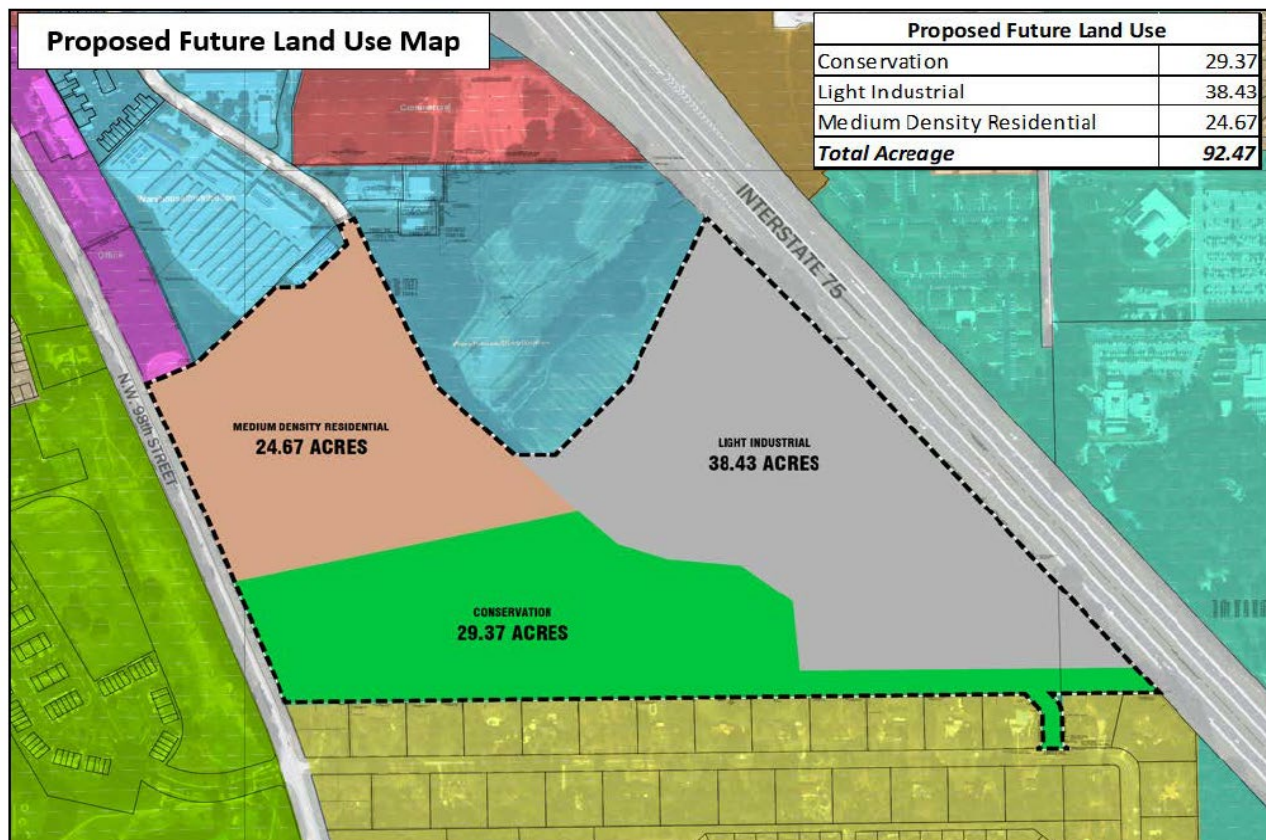
- EDA has indicated the 11-acre internal parcel (PN 06233-000-000, previous aerial) owned by Yadda Property Holdings, LLC has a drainage easement previously conveyed to FDOT. Staff requested documentation provided by FDOT to verify if development-related facilities can be proposed within this area. For instance, the potential of a joint-use stormwater basin facility would be another option to avoid significant habitat encroachment. Since the concept plan includes a proposed access road through this parcel, documentation will be necessary from FDOT to address R/W easement and structure requirements.
- EDA and County staff concur that due to the function and benefits of this particular significant habitat, it would be appropriate and justified to at least protect enough area to achieve the 25% requirement of the upland portion of the subject property [(ULDC Section 406.21 (a))]. With a planning parcel of 116 acres, that would equate to protection of 29 acres of significant habitat. As

noted on the land use map (right), the applicant has proposed to place 29.37 acres into a “conservation” land use classification.

- However, of this proposed area, approximately 2.8 acres is associated with a 100-ft. wide vegetated buffer located along the southeastern property boundary. Even though placing a narrow buffer along the property boundary into a conservation land use provides some benefits to be evaluated for conservation land use classification, the habitat functions and benefits of this proposed buffer will not be near as comparable as to those provided by the significant habitat. As a result, the total estimate of 26.6 acres of significant habitat proposed within conservation land use would still be lacking approximately 2.4 acres of fulfilling the 25% requirement.
- There are indications it may be necessary to install utilities along the eastern R/W of NW 98<sup>th</sup> Street to provide service for this proposed project. In turn, this may require removing additional significant habitat than indicated in the concept plan. Thus, in addition to the acreage shortfall referenced above, there would be more justification to incorporate design revisions to protect additional significant habitat to adequately and appropriately compensate for encroachment that may be deemed necessary for utilities.

## Recommendation Options

For proposed development projects in the land use and rezoning phase, it is unusual for an application to propose placing an area within a conservation land use without conducting the appropriate and necessary alternatives analysis to determine if and where facilities can be designed to avoid and minimize encroachment into natural resources. However, there are recommended options provided for the applicant and staff to evaluate and discuss:



- Implement conservative approach to include all the estimated 32.6 acres of significant habitat within the conservation land use and zoning classifications. This provides a baseline condition for the applicant and EDA to evaluate design options, as well as additional safeguard assurance that the 29 acres of preservation (25% code requirement) can still be achieved if it is determined during design phase that significant habitat encroachment will be necessary for structures, facilities and/or utilities. If it becomes apparent that encroachment is necessary, the designated conservation zoning and future land use can be revised to reflect the final design.
- Conduct additional field evaluation to delineate and survey boundary limits to ensure a minimum 29 acres of the higher quality significant habitat is designated within the conservation zoning and land use areas. The currently proposed significant habitat conservation area is approximately 26.6 acres, therefore an additional 2.4 acres within the northwest area would be necessary to achieve the 25% requirement. However, because revisions can be expected during the design phase to ensure the 29 acres of protection, it is probable this option would still require boundary revisions to the proposed Conservation zoning and future land use areas.