



Alachua County – Growth Management Staff Report

Application Z25-000003

Application Details

Staff Contact

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Staff Phone Number

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Planning Commission Hearing Date

April 16, 2025

Board of County Commissioners Hearing Date

May 27, 2025

Requested Action

A request for a large-scale Comprehensive Plan amendment.

Property Owner

Gator Country, LLC and Bentley Properties Inc.

Property Description

Address: Located to the northwest of the SE Hawthorne Rd./Lakeshore Dr. intersection

Parcel Numbers: 16184-000-000, 16185-000-000, 16201-004-000, 16194-001-000, 16194-002-000 and 16194-000-000

Section/Township/Range: 12/10/20 & 13/10/20

Land Use: Estate Residential (up to 1 dwelling unit per 2 acres), Low Density Residential (1 to 4 dwelling units/acre) and Commercial

Zoning: R-1a, A, BR, BH and MB

Acreage: 82 +/-

Previous Requests

ZOX-02-05: Special Exception to allow a cocktail lounge/bar in an "MB" (Marine Business) Zoning District (on parcel 16194-002-000)

Zoning Violation History

None.

Applicant/Agent

Clay Sweger of eda, inc.

Project Timeline

- Submitted: February 24, 2025
- Staff Report Distributed: April 11, 2025
- Planning Commission Hearing: April 16, 2025

Staff Recommendation

Staff recommends that the Board of County Commissioners **transmit Z25-000003** to the Florida Department of Commerce for review and comment, with the bases as listed in the staff report.

Planning Commission Recommendation

The Planning Commission, acting as the Local Planning Agency, recommended that the Board of County Commissioners should **not transmit Z25-000003 (4-3 vote)**.

Background

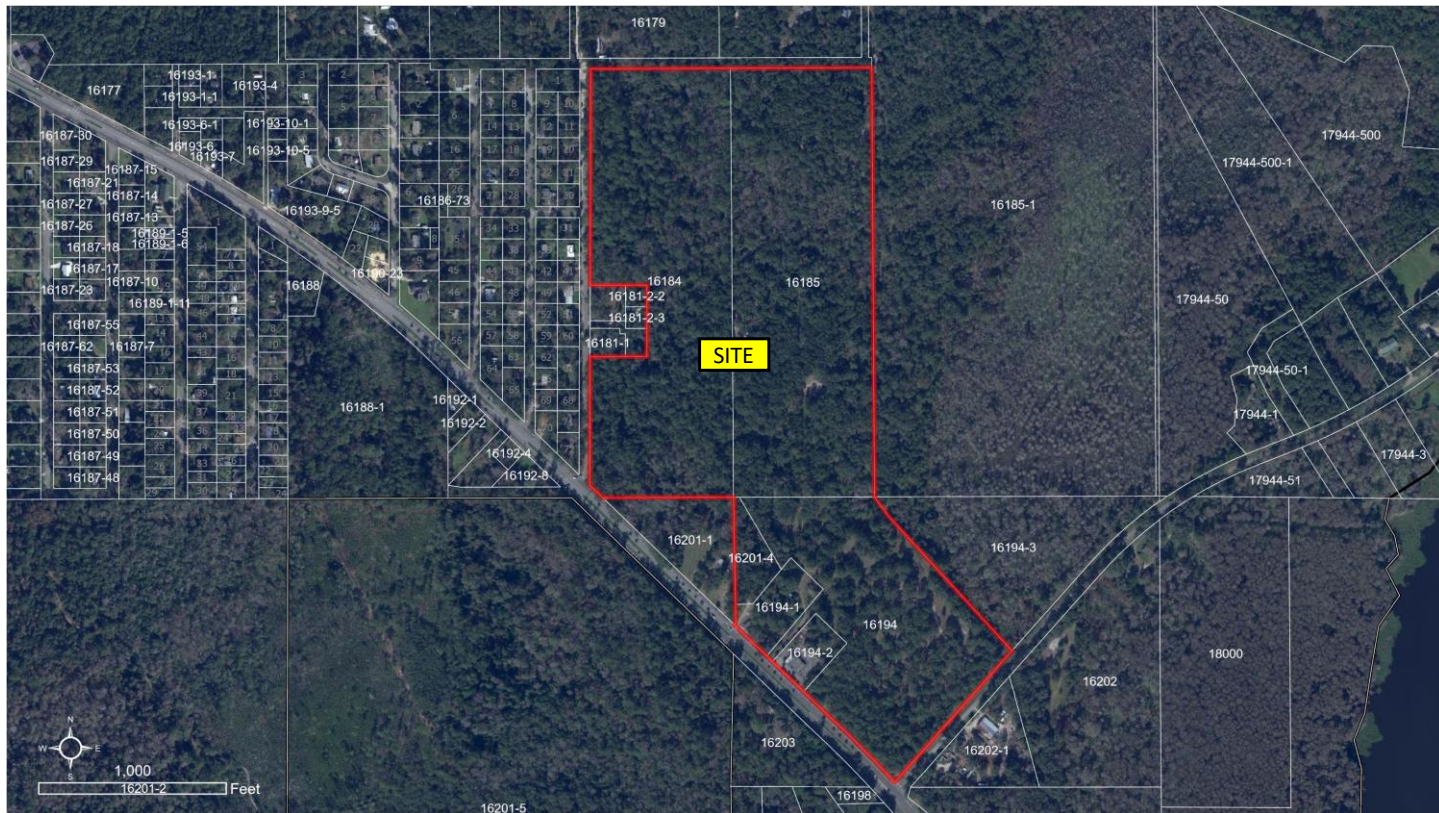


Figure 1: Aerial image of site

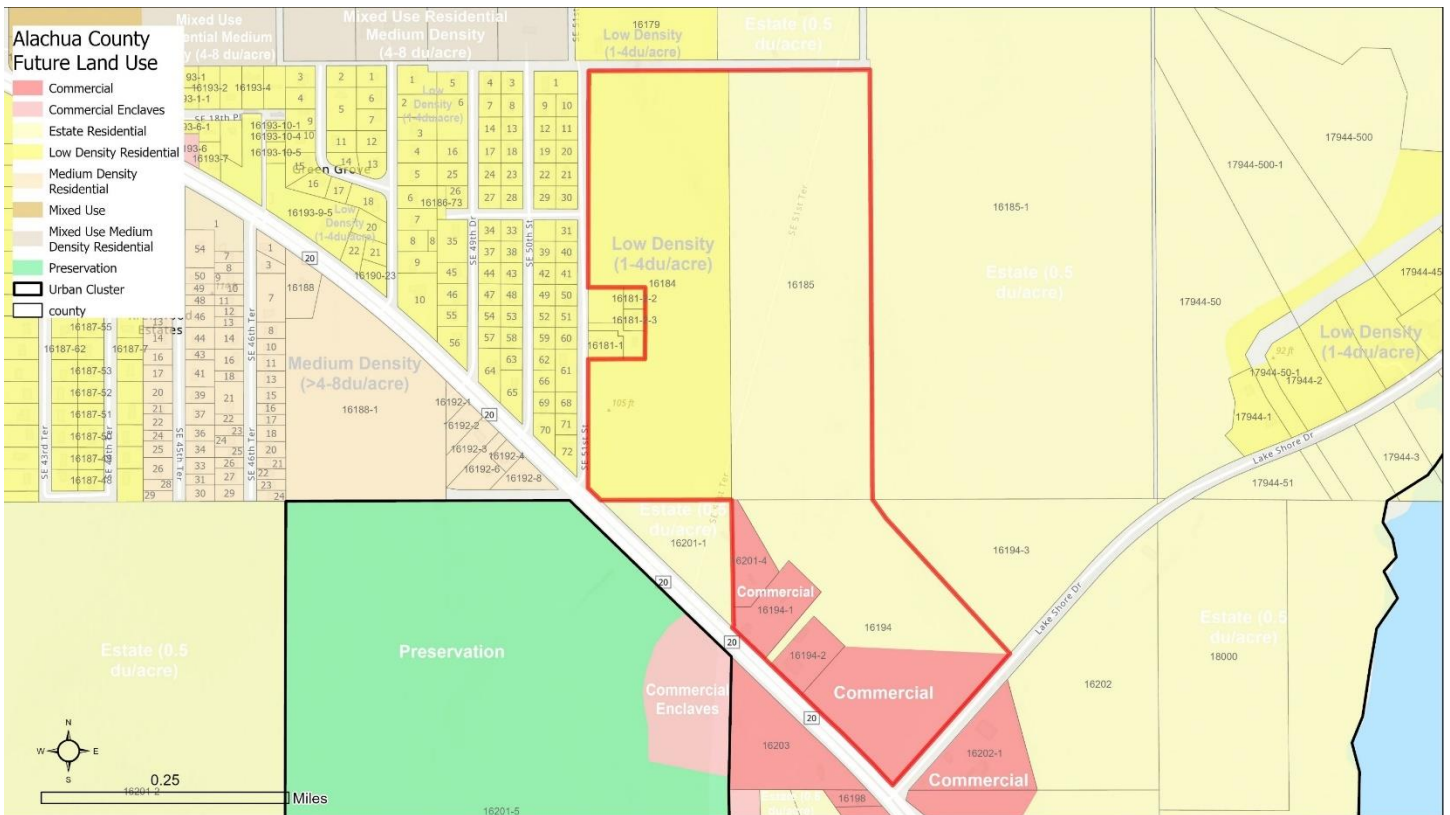


Figure 2: Future Land Use Map (Existing)

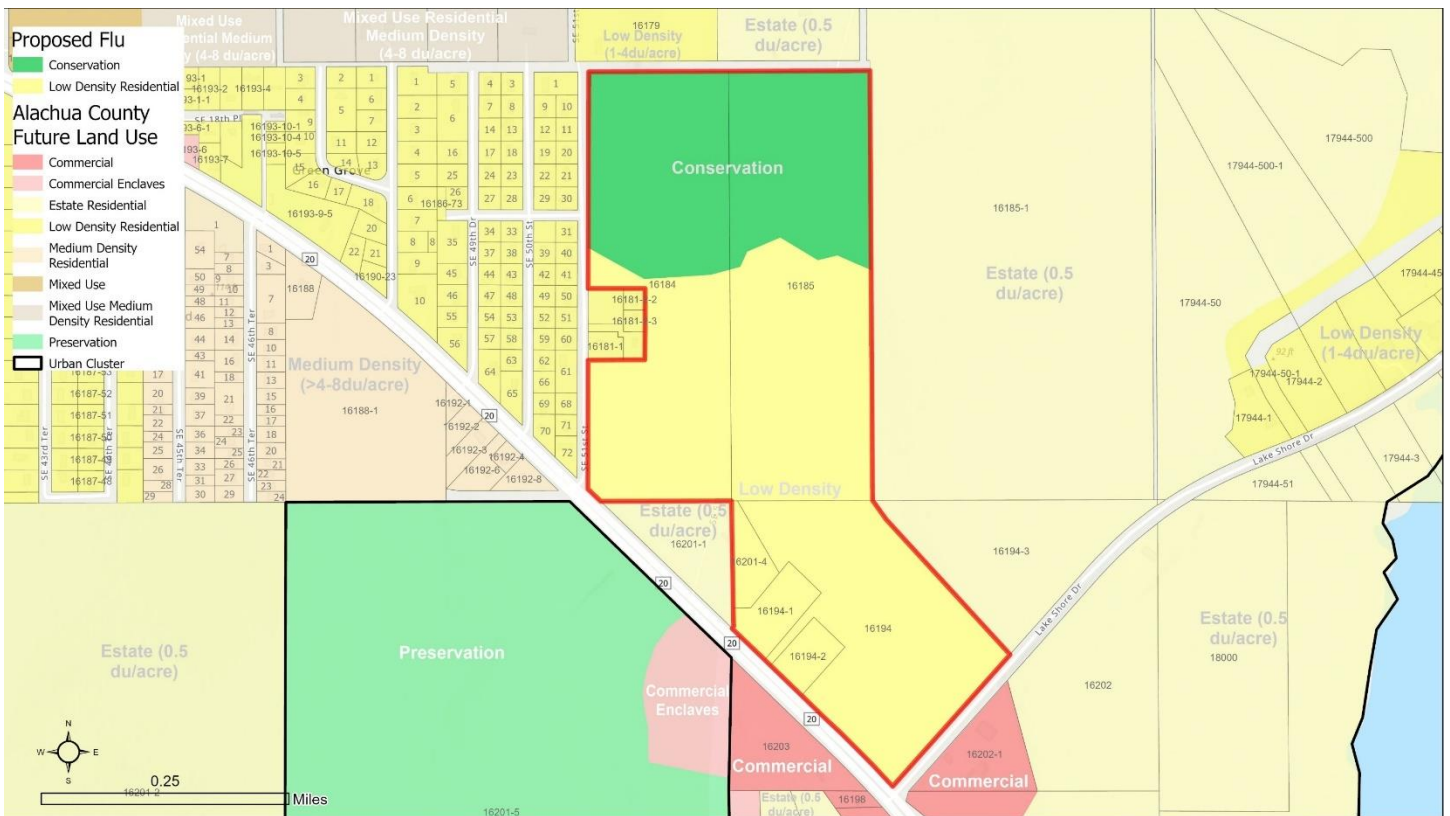


Figure 3: Future Land Use Map (Proposed)

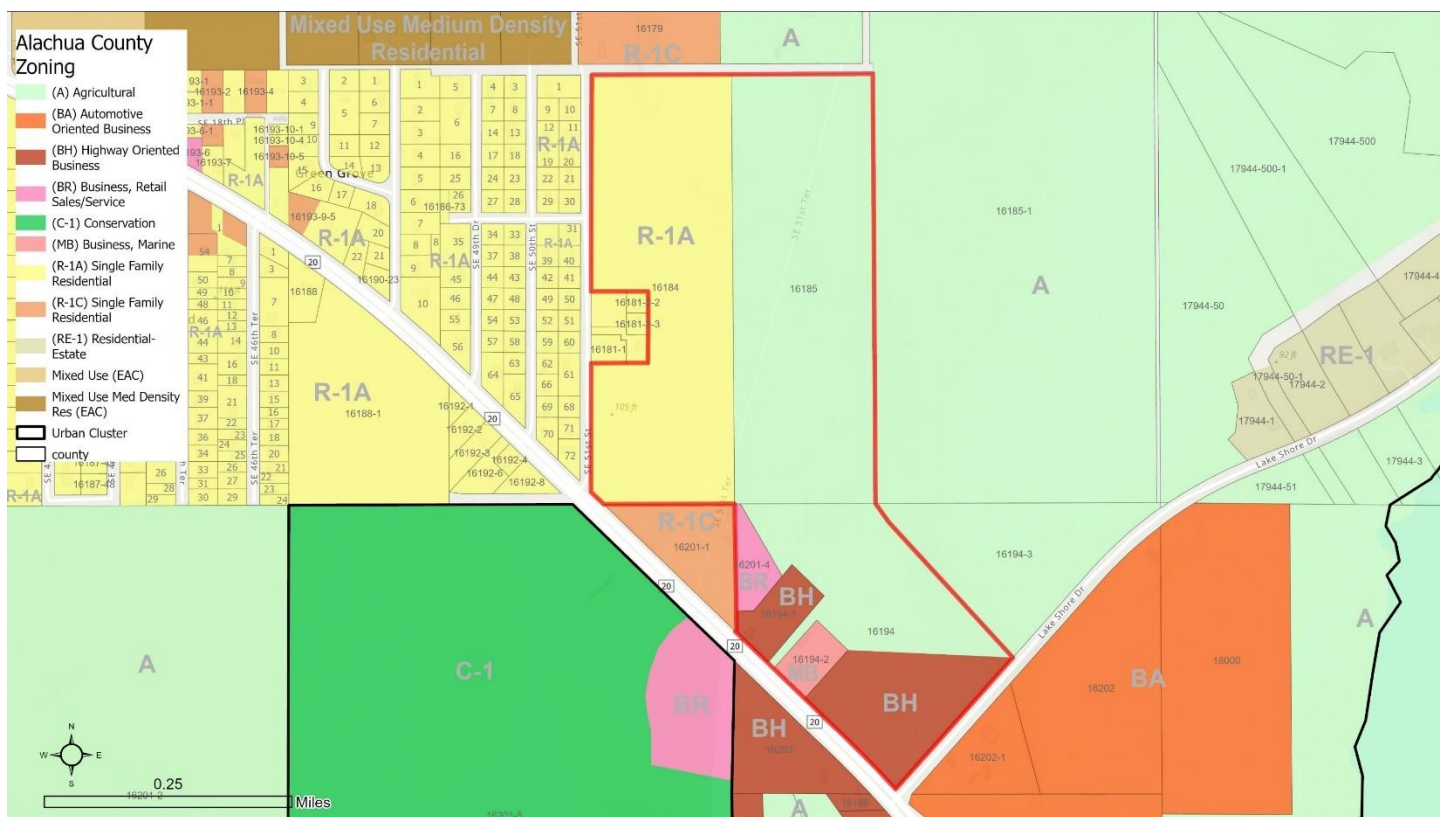


Figure 4: Zoning Map (Existing)

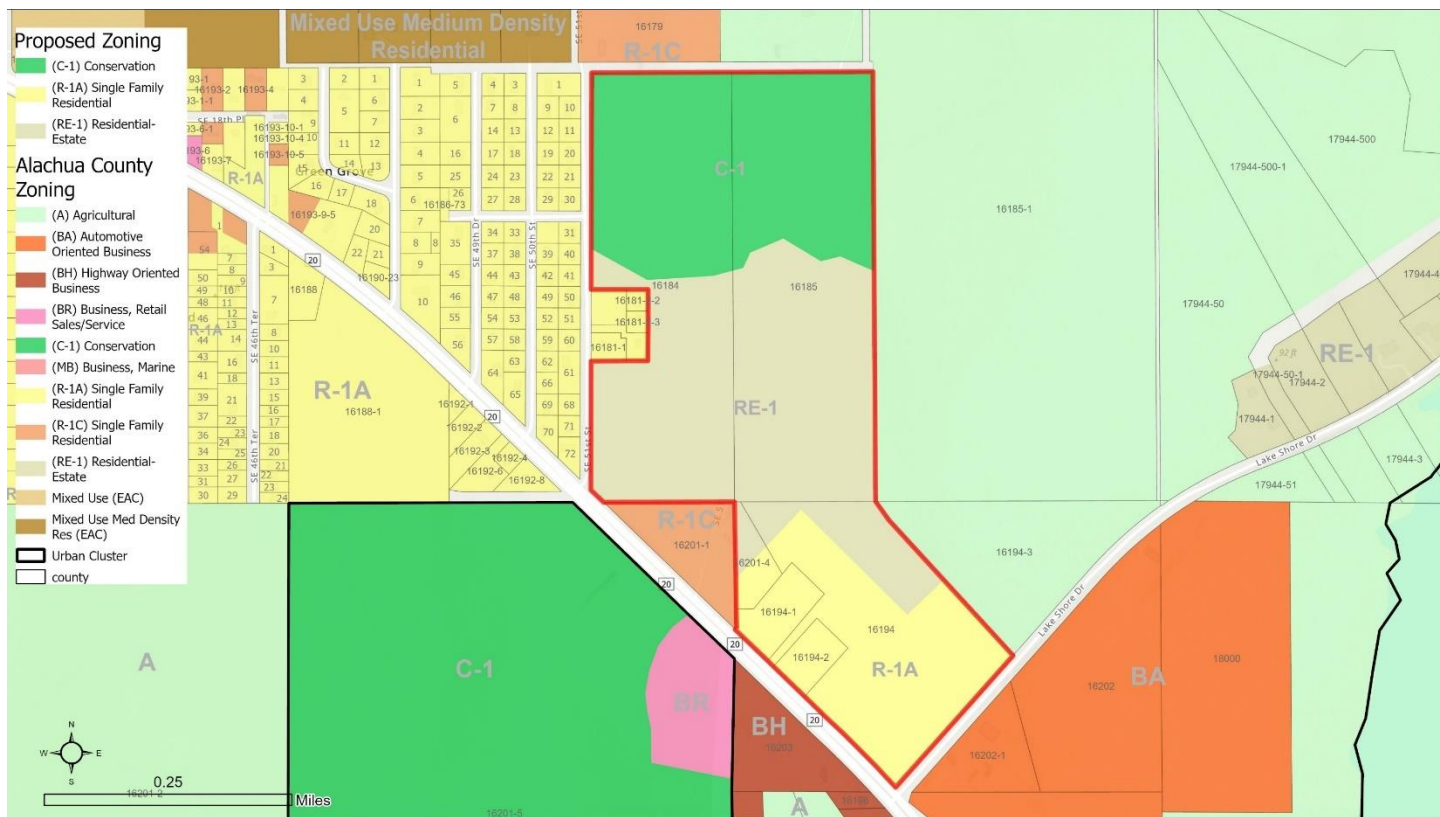


Figure 5: Zoning Map (Proposed)

This application is a request to amend the future land use designation on parcels 16184-000-000, 16185-000-000, 16201-004-000, 16194-001-000, 16194-002-000 and 16194-000-000. A companion application, Z25-000004, is requesting a rezoning for the same parcels.

The applicant is seeking to amend the land use designations on the future land use map in anticipation of future residential development. If approved, the northern portion of the site would have a designation of Conservation, covering the portion of the site that is approximately aligned with the Eastside Greenway Strategic Ecosystem. The remainder of the site would be designated as Low Density Residential (1 to 4 units/acre).

With the existing land uses, the site has the potential for 131 dwelling units, as well as significant commercial potential. Using an assumption of 10,000 sq. ft. of non-residential per acre as a potential development scenario, this would result in 124,000 sq. ft. (12.4 acres of Commercial land use designation).

Existing FLU Map

FLU Designations	Acres (+/-)	Permitted DU/AC	Maximum Units	Permitted Non-Residential SF/AC	Maximum SF
Low Density Residential	27.8 Ac.	4 DU/AC	111 Units	0 SF/AC	0 SF
Estate Residential	41.1 Ac.	1 DU/2 AC	20 Units	0 SF/AC	0 SF
Commercial	12.4 Ac.	0 DU/AC	0 Units	10,000 SF/AC ⁽¹⁾	124,000 SF
Total	81.3 Ac.		131 Units		124,000 SF

⁽¹⁾ Assumes 10,000 SF per Acre.

Proposed FLU Map

FLU/Zoning Designations	Acres (+/-)	Permitted DU/AC	Maximum Units	Permitted Non-Residential SF/AC	Maximum SF
Low Density Residential	54.8 Ac.	4 DU/AC	219 Units	0 SF/AC	0 SF
Conservation	26.5 Ac.	1 DU/10AC	2 Units	0 SF/AC	0 SF
Total	81.3 Ac.		221 Units		0 SF

Summary of Net Change between Existing and Proposed FLU Map

	Residential Units	Non-Residential SF
Existing FLU Map	131 Units	120,400 SF
Proposed FLU Map	221 Units	0 SF
Net Change	+90 Units	- 124,000 SF

As shown in the last table above, the net change would result in 90 additional units and a complete loss of non-residential area. It should be noted that if this land use amendment is approved a subsequent rezoning will be necessary to implement the new land use designations. The applicant has submitted a companion rezoning application, Z25-000004, that requests rezoning the site in a way that would limit the potential number of dwelling units down to 149, much less than the maximum of 221.

Site description

The site consists of six parcels totaling approximately 82 acres located to the northwest of the SE Hawthorne Rd./Lakeshore Dr. intersection, in the southeastern portion of the Urban Cluster.

The existing future land use designation of the site includes a mix of Low Density Residential (1 to 4 dwelling units/acre), Estate Residential (up to 1 dwelling unit per 2 acres) and

Commercial. The zoning of the site includes R-1a and Agricultural in the norther portion of the site and a mix of commercial zoning districts along the portion fronting SE Hawthorne Rd. The site is mostly undeveloped, with the exception of some abandoned commercial buildings along SE Hawthorne Rd (on parcels 16194-001-000 and 16194-002-000). The northern portion of the site (a little over 30 acres) lies within the Eastside Greenway Strategic Ecosystem and contains wetlands.

To the north of the site are larger (5+ acre) parcels with single family residences. These parcels have Low Density Residential and Estate Residential future land use designations and a mix of zoning (R-1a, R-1c and A).

To the east of the site are two parcels with Estate Residential future land use designation and Agricultural zoning. These parcels are largely covered by wetlands and have a conservation easement. The Eastside Strategic Ecosystem also extends along these parcels bordering to the east (with a small portion extending into the southernmost parcel of this site). The topographic map (Figure 13 below) also shows the general slope of the land to run downward towards the east, toward wetlands on adjacent parcels.

To the southeast, across Lakeshore Dr., are parcels with a split of Estate Residential and Commercial future land use designations, with Commercial being located in the vicinity of the Lakeshore Dr./SE Hawthorne Rd. intersection. A tree service business is located on parcel 16202-001-000. This area is the only area within the eastern portion of the Urban Cluster with a Commercial future land use designation. Parcels to the south of the site (south of SE Hawthorne Rd.) have Commercial future land use and commercial zoning (BH) but no commercial uses. Further to the southwest, across the right-of-way for SE Hawthorne Rd./SR 20 (approximately 100 ft.) lies the boundary of Paynes Prairie Preserve State Park, owned by the State of Florida.

To the west of the site is the Green Grove subdivision with Low Density Residential future land use and R-1a zoning. Further the northwest (approximately 110 ft.) lies the boundary of the Eastside Activity Center, where County maintenance of SE 51st St. ends.



Figure 6 (left): View from Lakeshore Rd. looking south



Figure 7 (right): One of the abandoned commercial buildings on-site along SE Hawthorne Rd.



Figure 8: View near central area of site



Figure 9: Additional view from center of site



Figure 10: Wetland Map

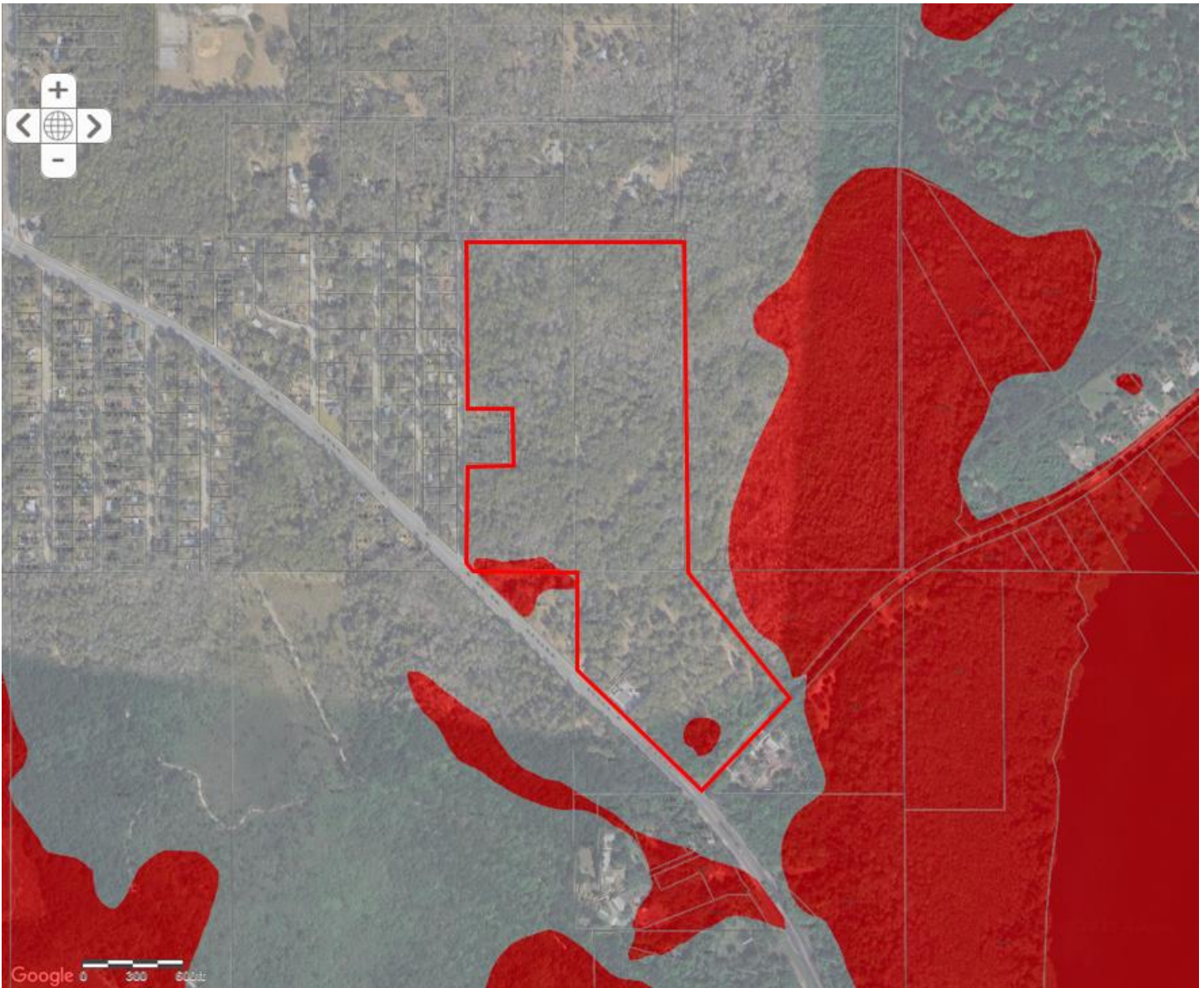


Figure 11: Flood Zone Map

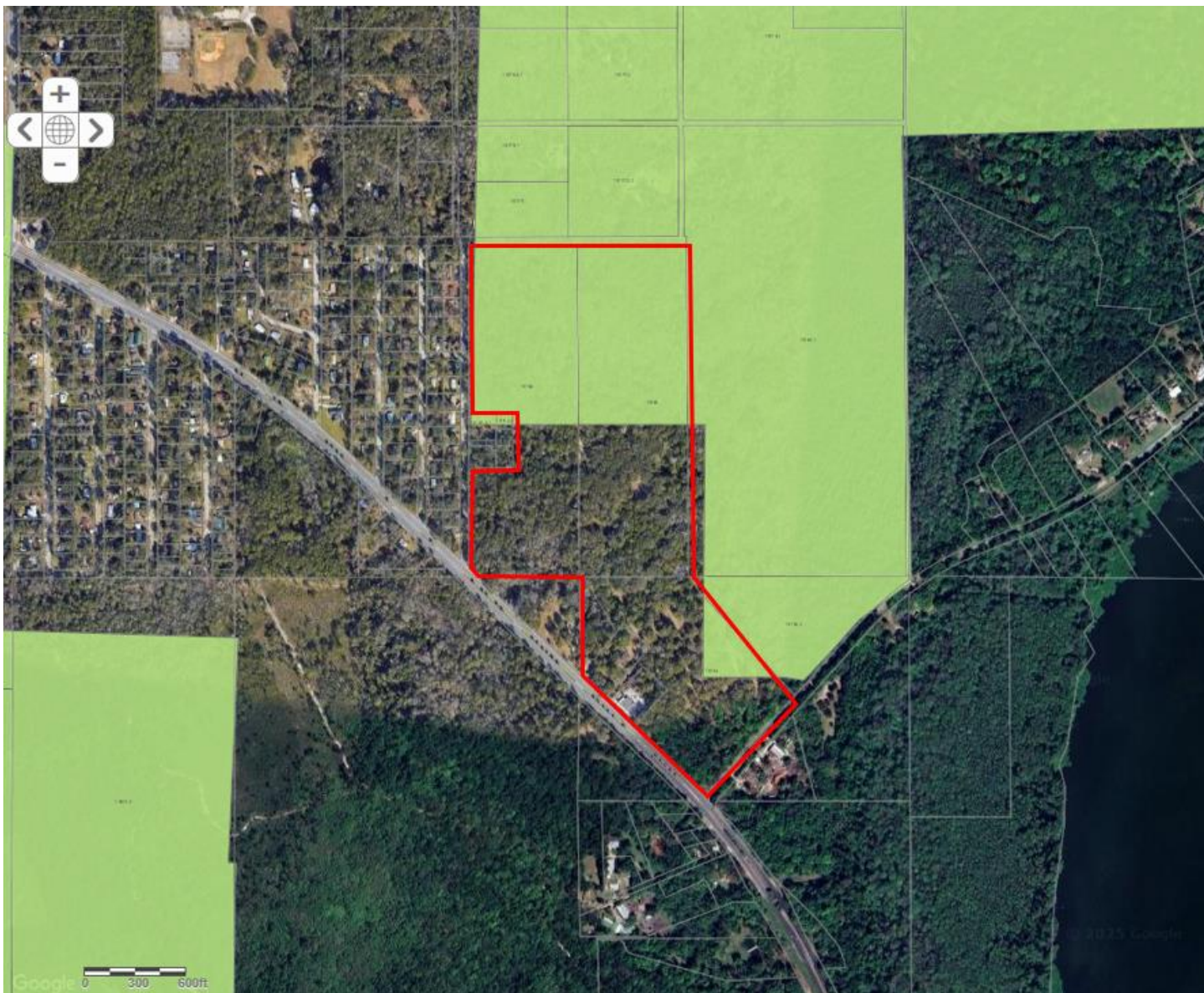


Figure 12: Strategic Ecosystem Map

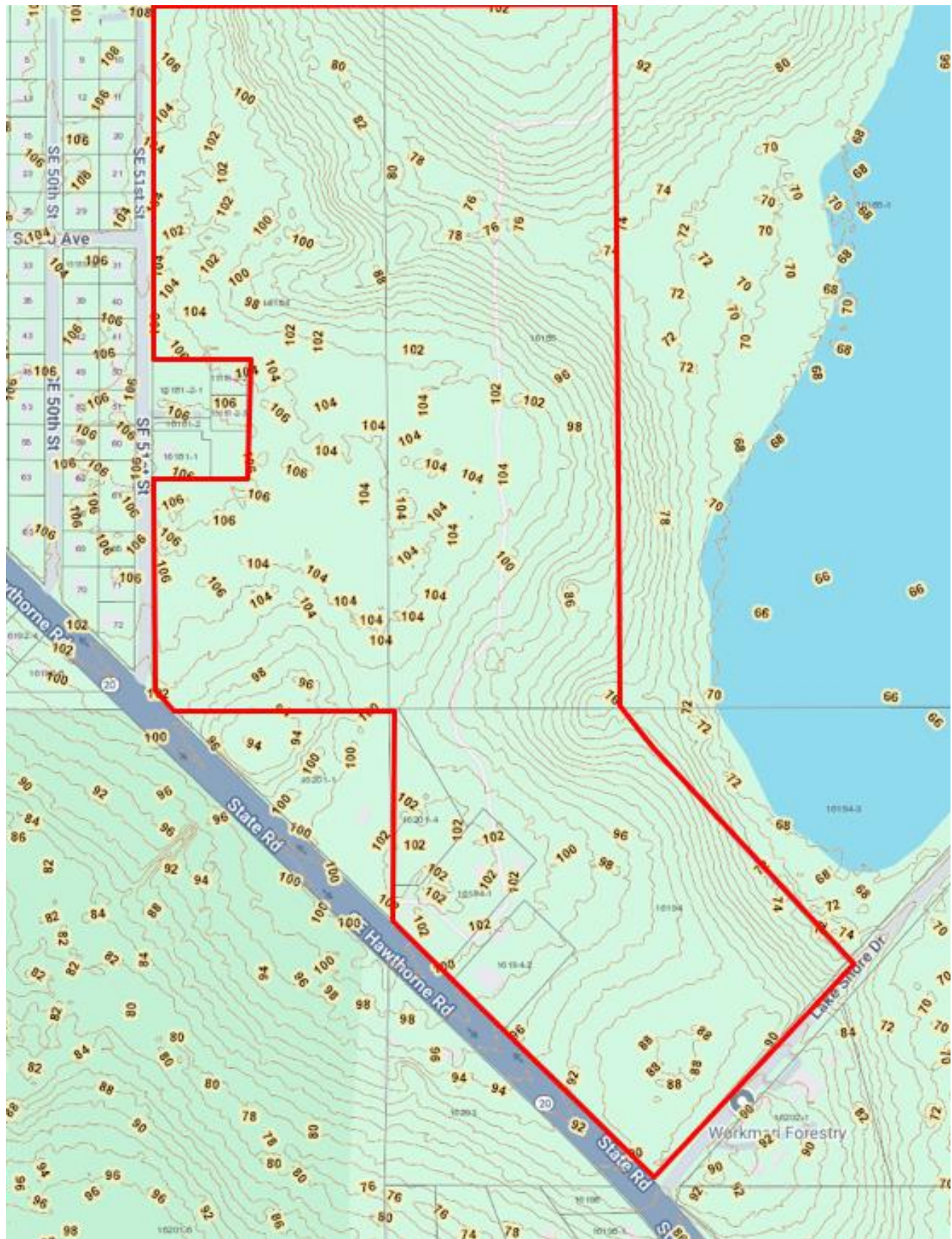


Figure 13: Topographic map

Evaluation of consistency with Florida Statute 163.3177

Florida Statute 163.3177(8) requires that comprehensive plan map amendments be based on the following analyses:

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

These analyses were made during staff's review of this application. As demonstrated in the "Levels of Service" section below, public facilities and services are adequately available to serve future development on this site if the amendment is approved. The applicant has provided an Environmental Resource Assessment that staff from the Alachua County Environmental Protection Department (ACEPD) has reviewed in order to analyze the suitability of the plan amendment considering the physical characteristics of the site, natural resources present and historic resources. Staff has concluded that the amendment is consistent with the protection of natural resources. Further details have been provided in ACEPD's comments (shown in Staff and Agency comments section below).

The amendment provides a relatively small increase in density (from 131 to 221 maximum units on an 82 acre site, or from 1.6 units/acre to 2.7 units/acre) that is likely the minimum amount needed to provide a feasible development on this site.

Florida Statute 163.3177(9) further states that future land use amendments shall discourage the proliferation of urban sprawl. Alachua County uses the boundary of the Urban Cluster to discourage urban sprawl. Land lying outside of this boundary is considered rural with much lower residential density than the urban densities found inside the boundary. Additionally, urban services such as centralized water and sewer lines may not be extended beyond this boundary without approval by the Board of County Commissioners and with specific justification. As this amendment lies within the Urban Cluster it can maximize the use of existing urban infrastructure. The Alachua County Comprehensive Plan encourages higher densities and mixture of land uses within the Urban Cluster that support a range of housing choices and a multimodal transportation

system. The site of the proposed amendment lies within the Urban Cluster and can implement the Comprehensive Plan's goals to discourage urban sprawl.

Consistency with 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

The proposed amendment would result in the elimination of 12.4 acres with Commercial land use designation on the site. Using an assumption of 10,000 sq. ft. of commercial uses per acre (i.e. 124,000 sq. ft.) a shopping plaza (ITE code 821) could result in 11,717 daily trips. Single-family residential uses (ITE code 210) produce far fewer trips. As proposed, the rezoning would result in over 10,000 fewer daily trips compared with the shopping plaza scenario development. From data generated by the ITE Trip Generation Manual, 11th Edition, an average of 2,084 daily trips would be expected with 221 units. However, with the proposed rezoning application (Z25-000004) accompanying this application, the number of trips would be further reduced to 1,405 based on the maximum number of units (149) that would be possible with the zoning proposed. Development on the subject property will mitigate its impacts through the mobility fee program. Any necessary operational improvements will be analyzed during development plan review.

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

The site is located within the Urban Cluster and will be served by existing centralized water and sewer lines that run along SE Hawthorne Rd.

Drainage

Policy 1.2.4 of the Capital Improvements Element states that the minimum drainage LOS standard for residential development requires a floor elevation of one (1) foot above the 100-year/critical duration storm elevation. Development on this site would 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 rural area is as follows:

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

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

Solid Waste

Policy 1.2.4 (b) of the Capital Improvements Element states that the minimum level of service standard for solid waste disposal used for determining the availability of disposal capacity to accommodate demand generated by existing and new development, at a minimum, shall be 0.8 tons per person per year. LOS standards for solid waste will not be exceeded by this request.

Schools

Objective 2.2 of the Public School Facilities Element states that Alachua County in coordination with SBAC shall ensure that the capacity of public schools is sufficient to support final development plans for residential developments.

The maximum potential of dwelling units from the proposed large-scale Comprehensive Plan amendment would be 221. This results in a net increase of 90 dwelling units. The site is located in the Eastside High School Concurrency Service Area (CSA), the Lincoln Middle School CSA and the Gainesville East Alachua Elementary CSA. Based on the Alachua County School Board’s (ACSB) student multipliers this would yield the following number of student stations:

SINGLE FAMILY RESIDENTIAL DEVELOPMENT STUDENT GENERATION CALCULATIONS

ELEMENTARY	221	units X 0.12 Elementary School Multiplier	27	Student Stations
MIDDLE	221	units X 0.06 Middle School Multiplier	14	Student Stations
HIGH	221	units X 0.09 High School Multiplier	20	Student Stations

The ACSB states in its 2023 School Concurrency Report that student capacity within the Concurrency Service Areas for this site during the 2025-26 school year are as follows:

Elementary: 2,503 available stations (70% capacity)

Middle: 364 available stations (65% capacity)

High: 1,054 available stations (57% capacity)

Therefore, adequate capacity exists to meet the Level of Service (LOS) Standards for public schools (i.e. 100% of Program Capacity).

Recreation

The proposed land use amendment will maintain the County’s adopted level of service (LOS) for recreation. **Policy 1.2.4(a) of the Capital Improvements Element** states:

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 based recreation sites per 1000 persons in the unincorporated area of Alachua County.

The proposed amendment authorizes up to 221 dwelling units. The Alachua County Parks and Open Space Master Plan (2023) identifies the following:

Year	Unincorporated Alachua Co. Pop. Est.	Existing Activity-Based Acres	Acres Needed	Surplus/Deficiency Acres
2022	112,471	95	56	39
2027	116,036	95	58	37
2035	127,020	95	64	31

Year	Unincorporated Alachua Co. Pop. Est.	Existing Resource-Based Acres	Acres Needed	Surplus/Deficiency Acres
2022	112,471	611	562	49
2027	116,036	611	580	31
2035	127,020	611	635	-24

Figure 14: Recreation surplus/deficiency for unincorporated county

The additional number of units (90 additional from existing) that would be authorized if this amendment were to be approved would not cause a deficiency in the Recreation LOS.

General Strategy 1 of the Future Land Use Element identifies *...minimizing the conversion of land from rural to urban uses by maximizing the efficient use of available urban infrastructure, while preserving environmentally sensitive areas...* as a way to implement the County’s principles for the goal of encouraging “orderly, harmonious and judicious use of land”. The proposed amendment provides new opportunities for residential development with the eastern portion of the Urban Cluster, making use of available urban infrastructure, while designating the Eastside Greenway strategic ecosystem as Conservation.

Policy 1.5.1 of the Future Land Use Element states:

New residential development shall meet all of the requirements for adequate facilities based on the level of service standards adopted in this Plan for roads, potable water, sanitary sewer, solid waste, stormwater, public schools, recreation and open space facilities, and mass transit and the concurrency provisions of this Plan.

As identified in the Level of Service section above, the proposed amendment will meet all of the LOS standards adopted in this Plan.

Principle 3 of the Transportation and Mobility Element states:

Discourage sprawl and encourage the efficient use of the urban cluster by directing new development and infrastructure to areas where mobility can be provided via multiple modes of transportation.

The site of this amendment is located within the southeast portion of the Urban Cluster, at the intersection of SE Hawthorne Rd. and Lakeshore Dr. it is in close proximity to the Eastside Activity Center and Eastside High School. Existing RTS transit reaches SE 43rd Street, about $\frac{3}{4}$ mile to the west.

Policy 1.1.1 of the Housing Element states:

Alachua County shall, through the policies in the Future Land Use Element, provide areas for residential development which would be suitable for the development of affordable housing. These areas shall take into account the availability of infrastructure and land, the accessibility to employment and services, the proximity to shopping, daycare facilities, transit corridors, and the promotion of infill opportunities.

Policy 3.4.1 of the Conservation and Open Space Element states that all applications for land use change, zoning change and development approval shall be required to submit an inventory of natural resource information. In the land use and zoning context, the County shall use this information to determine whether the requested change is consistent with protection of natural resources. The applicant has submitted an Environmental Resources Assessment as part of the application materials. Alachua County Environmental Protection Department staff have reviewed this assessment and found that the application as proposed is consistent with the protection of natural resources (see staff comments below).

Policy 3.1.4 of the Energy Element states:

Promote energy-efficient land use patterns that reduce travel costs and encourage long-term carbon sequestration.

The proposed amendment promotes energy efficient land use patterns that reduce travel costs. The site is located within the Urban Cluster, abutting an arterial state road (SE Hawthorne Rd.). Approval of the amendment will help to provide residential opportunities for the eastern portion of the Urban Cluster.

Staff Recommendation

Staff recommends that the Board of County Commissioners **transmit Z25-000003** to the Florida Department of Commerce for review and comment, with the bases as listed in the staff report.

Bases

1. Policy 1.5.1 of the Future Land Use Element states:

New residential development shall meet all of the requirements for adequate facilities based on the level of service standards adopted in this Plan for roads, potable water, sanitary sewer, solid waste, stormwater, public schools, recreation and open space facilities, and mass transit and the concurrency provisions of this Plan.

The applicant has demonstrated that the proposed land use amendment would meet all of the requirements for adequate public facilities based on level of service standards as adopted in the Comprehensive Plan.

2. Policy 8.5.7 of the Future Land Use Element states that the County shall promote and incentivize redevelopment of areas already in development or impacted by prior development for the East Gainesville Urban Area. The site is located in the East Gainesville Urban Area and is impacted by prior commercial development along the southern portion of the site. The commercial uses have been abandoned for several years. This amendment provides a means to redevelop the site for residential development.

3. Policy 3.4.1 of the Conservation and Open Space Element states that all applications for land use change, zoning change and development approval shall be required to submit an inventory of natural resource information. In the land use and zoning context, the County shall use this information to determine whether the requested change is consistent with protection of natural resources. Staff from the Alachua County Environmental Protection Department have reviewed the application and found that the proposed amendment is consistent with the

protection of natural resources. Evaluation of specific protection strategies will be made when a development plan is proposed.

4. **Objective 3.1 of the Energy Element** is to promote energy-efficient land use patterns that reduce travel costs and encourage long-term carbon sequestration. The proposed amendment makes use of existing urban infrastructure and promotes infill within the Urban Cluster.

Staff and Agency Comments

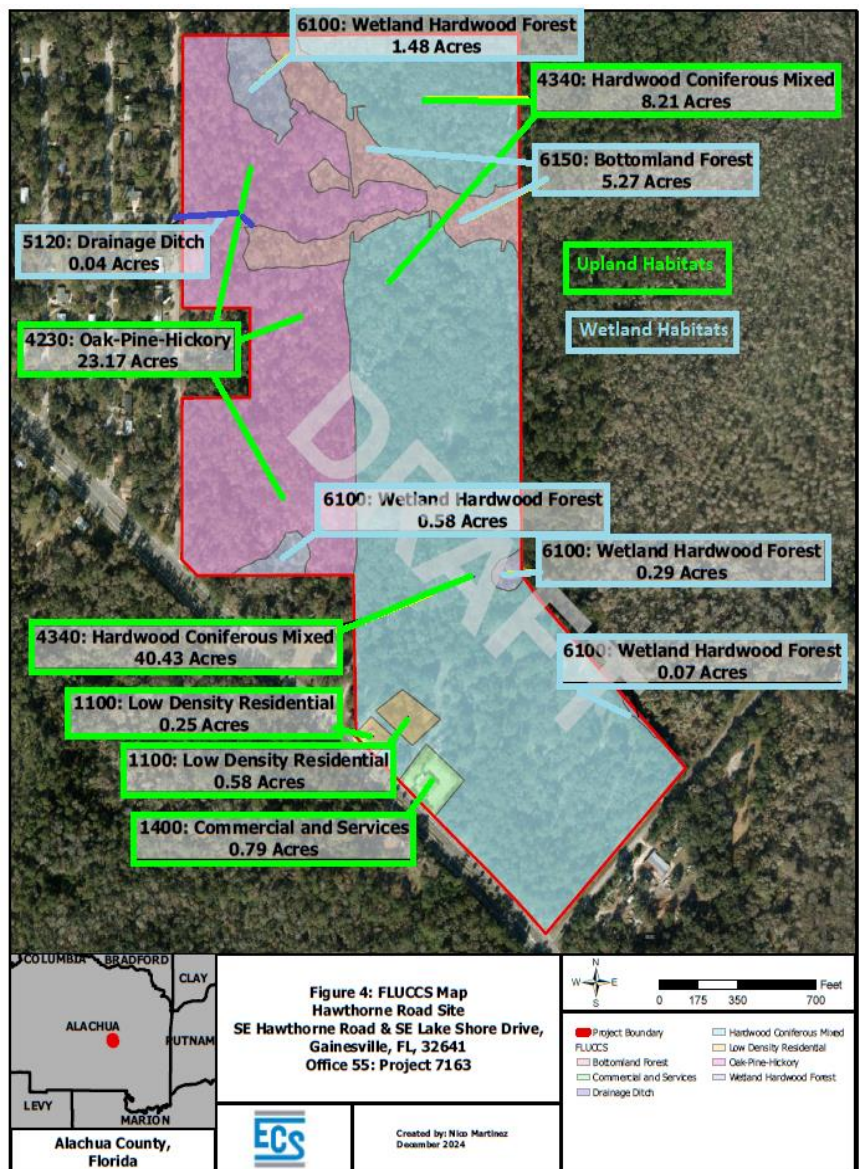
Department of Environmental Protection

The natural resources of the 82-acre “subject site” were evaluated by an environmental consulting firm (ECS Florida, LLC) during dates between December 17th - 23rd, 2024. As stated in the submitted environmental report, the “*purpose of the site visits were to evaluate for the occurrence and/or potential for occurrence and associated locations of jurisdictional wetlands and/or protected wildlife species (and their habitats).*”

Upland & Wetland Habitats

The subject site’s upland habitats (figure below, green highlight) have canopy vegetation dominated by live oak (*Quercus virginiana*) and loblolly pine (*Pinus taeda*); as well as hickory (*Carya glabra*) and southern magnolia (*Magnolia grandiflora*). The upland herbaceous ground cover vegetation includes species such as saw palmetto (*Serenoa repens*), beauty berry (*Callicarpa americana*), coral ardisia (*Ardisia crenata*), and air-potato (*Dioscorea bulbifera*).

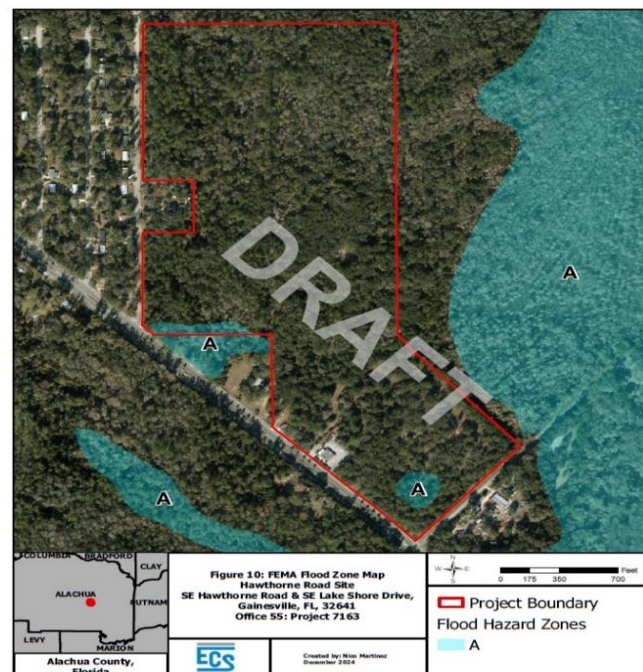
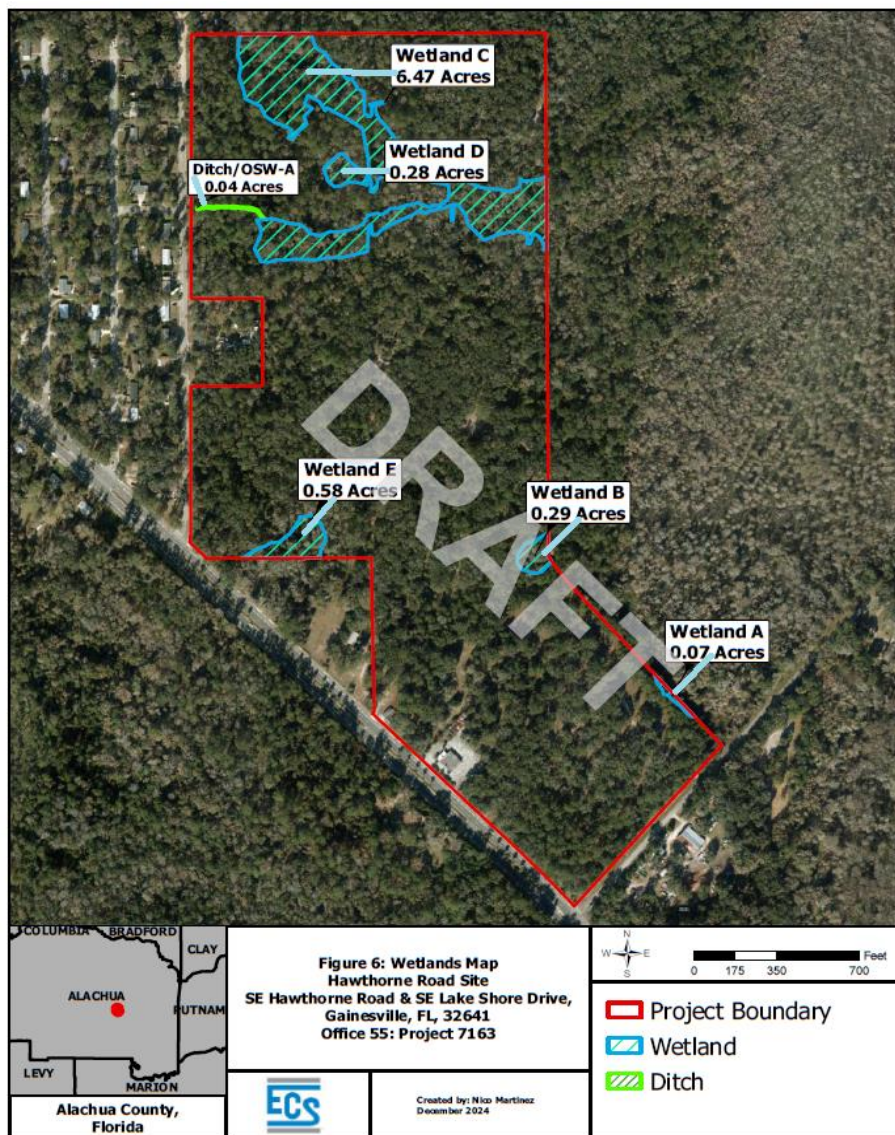
The site’s wetland habitat vegetation is dominated by water oak (*Quercus nigra*), laurel oak (*Quercus laurifolia*) and sweetgum (*Liquidambar styraciflua*) with a sub-canopy dominated by laurel oak. The



wetland herbaceous vegetation includes woodoats (*Chasmanthium spp*), cinnamon fern (*Osmundastrum cinnamomeum*), Virginia chain fern (*Woodwardia virginica*), arrowhead vine (*Syngonium podophyllum*), coral ardisia, and sphagnum (*Sphagnum spp*).

Wetlands, Surface Waters, 100-Year Flood Zone (ULDC - Sec. 406.42)

Alachua County’s ULDC wetland evaluation and delineation requirements follow the same uniform statewide methodology adopted by the FDEP and the WMD’s to delineate wetlands (FAC Rule 62-340.300) and surface waters (FAC Rule 62-340.600). ECS staff applied these methods for the subject site, resulting in the delineation of five wetlands and one surface water (ditch, OSW-A) within the subject site. EPD & ECS staff conducted a joint field review of the site and EPD staff concurred with the boundary delineations (right figure). The dominant wetland area (Wetland C – 6.5 acres) is associated with Lake Forest Creek and adjacent bottomland habitat that connects to other wetlands east to Newnans Lake. Preliminary discussions with the applicant and their engineering consultant (EDA, Inc.) indicate an objective of preparing a proposed

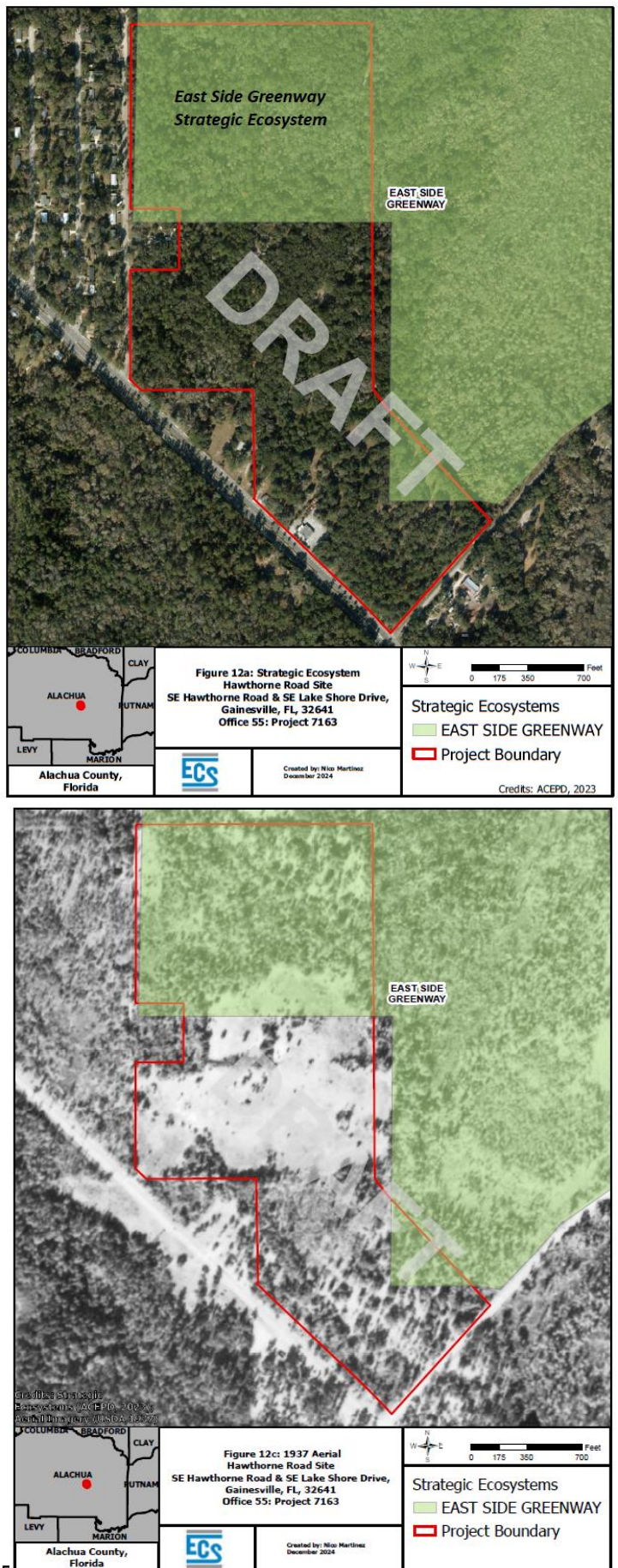


development plan that will achieve the average 75 ft., min. 50 ft. wetland buffer requirements (ULDC, Section 406.43).

As depicted on the right figure, the 100-Year Flood Zone “A” represents a small percentage of the subject site and doesn’t include the wetland associated with Lake Forest Creek.

Strategic Ecosystem (SE) ***(ULDC - Sec. 406.33)***

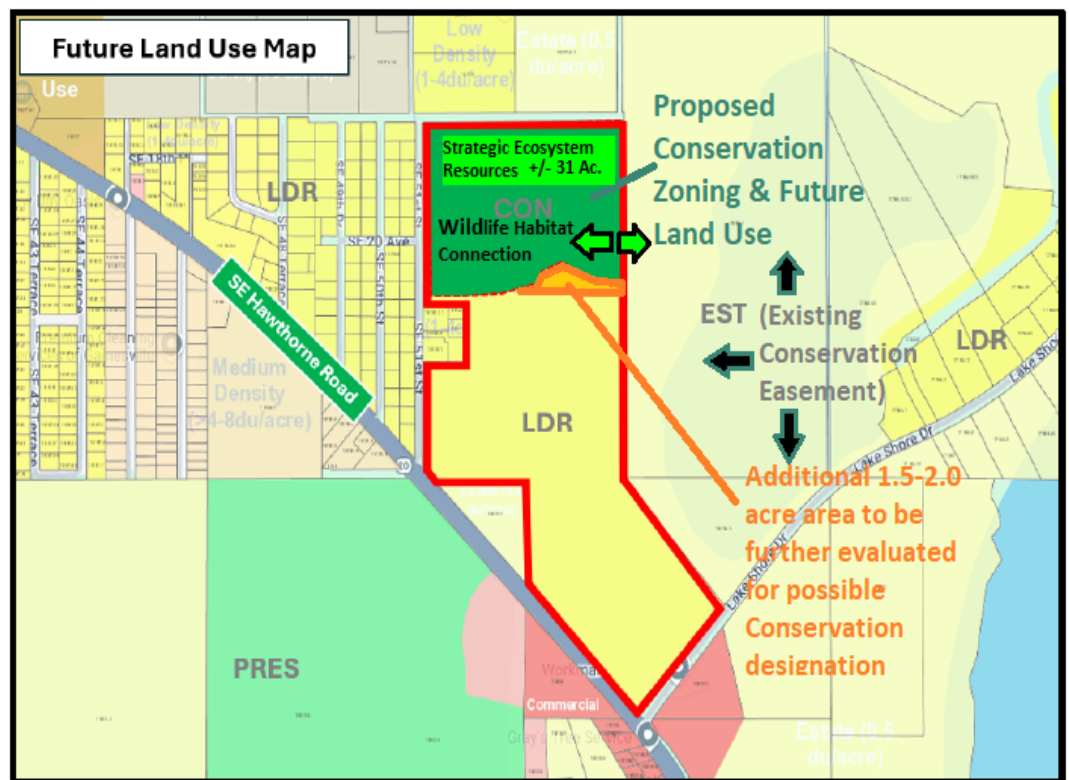
ECS staff utilized a combination of desktop analysis and field-based verification to evaluate the area designated within the *East Side Greenway Strategic Ecosystem* (SE) map overlay (right figure, 2024 aerial). The overlay map for this designated SE was generated based information compiled for the 1996 edition of the *Alachua County Ecological Inventory Project* (KBN/Golder). By reviewing various historical aerials dating back to the first overflight in 1937 (below), the periodic rotational pattern of primarily non-forested open fields followed by allowing natural regeneration of predominantly upland hardwood canopy within the southern half of the subject site were factors in excluding the southern extent of the SE map overlay across the subject site. Ground truth verification is required within delineated SE map overlays to verify the potential presence and extent of various natural habitats and ecosystem features that would appropriately qualify as strategic ecosystem



resources. When cross-referencing with the previous page, Forest Creek and associated forested wetland comprise 6.8-acres of the +/- 31 acres delineated in the SE map overlay. The remaining upland areas of the SE are comprised of “*Hardwood Conifer Mix*” in the northeast and “*Oak-Pine-Hickory*” in the northwest area of the subject site.

As referenced in the ULDC, the purpose of the designation and protection areas that has *Strategic Ecosystem* resources is “to protect, conserve, enhance, and manage the ecological integrity of natural systems in Alachua County that have aesthetic, ecological, economic, educational, historical, recreational, or scientific value due to the interrelationship of one or more landscape, natural community, or species scale characteristics. It is also the purpose of this Article to promote connectivity and minimize fragmentation of natural systems, and to protect wetlands, floodplains, and associated uplands in a broad systems context through resource-based

planning, including inter-jurisdictional and inter-agency coordination, across multiple parcels rather than individual parcel planning.” In addition to the various regulated natural resources referenced in Chapter 406 of the ULDC, there are other various features and factors that are evaluated in



determining the presence and extent of SE resources including but not limited to:

- *Vegetation value and species diversity, including exotic species presence.*
- *Habitat potential for endangered species and other wildlife.*
- *Hydrological characteristics, including connectivity to the Floridan Aquifer.*
- *Surface water and flood protection functions.*
- *Community diversity, rarity, and ecological quality.*
- *Landscape connectivity and overall management potential.*

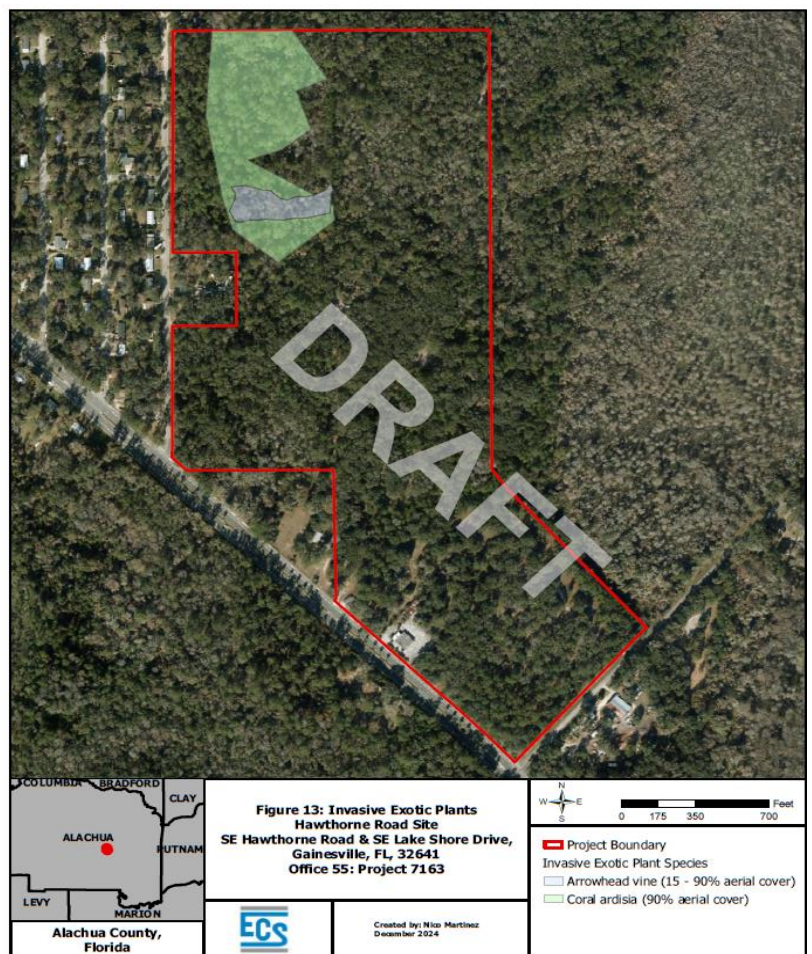
The above figure represents the location and preliminary southern boundary of the delineated SE resources within the SE overlay. As referenced on the figure, there is 1.5-2.0-acre area that has been historically cleared of tree canopy then regenerated tree canopy to be further evaluated for possible SE and Conservation classification. However, for current applications for Zoning and Future Land Use classifications of the subject site, the green-highlighted Conservation (CON) designation will not decrease in dimensions from the proposed Conservation future land use plan above. However, depending on the evaluation, dimensions may increase an additional 1.5-2.0- acres during Preliminary Design Phase evaluation (PDP).

Significant Habitat (SH) ***(ULDC - Sec. 406.17, 406.20)***

As referenced in the ULDC, the purpose of the “*Significant Habitat*” classification is “*to protect the **natural upland plant communities** which have the potential to maintain healthy and diverse populations of plants or wildlife, to preserve the ecological values and functions of significant plant and wildlife habitats, to provide for habitat corridors and minimize habitat fragmentation, in order to maintain and enhance the diversity and distribution of plant and animal species which are of aesthetic, ecological, economic, educational, historical, recreational, or scientific value to the County and its citizens.*”

Significant Habitat areas are designated based on consideration and assessment of factors referenced in the ULDC:

- * *Quality of native ecosystem.*
- * *Overall quality of biological diversity.*
- * *Wildlife habitat value.*
- * *Presence of listed or uncommon species.*



- * Grouping, contiguity, compactness of native vegetation.
- * Proximity to other natural preserve areas and corridors.
- * Impact by prohibited and invasive non-native vegetation.

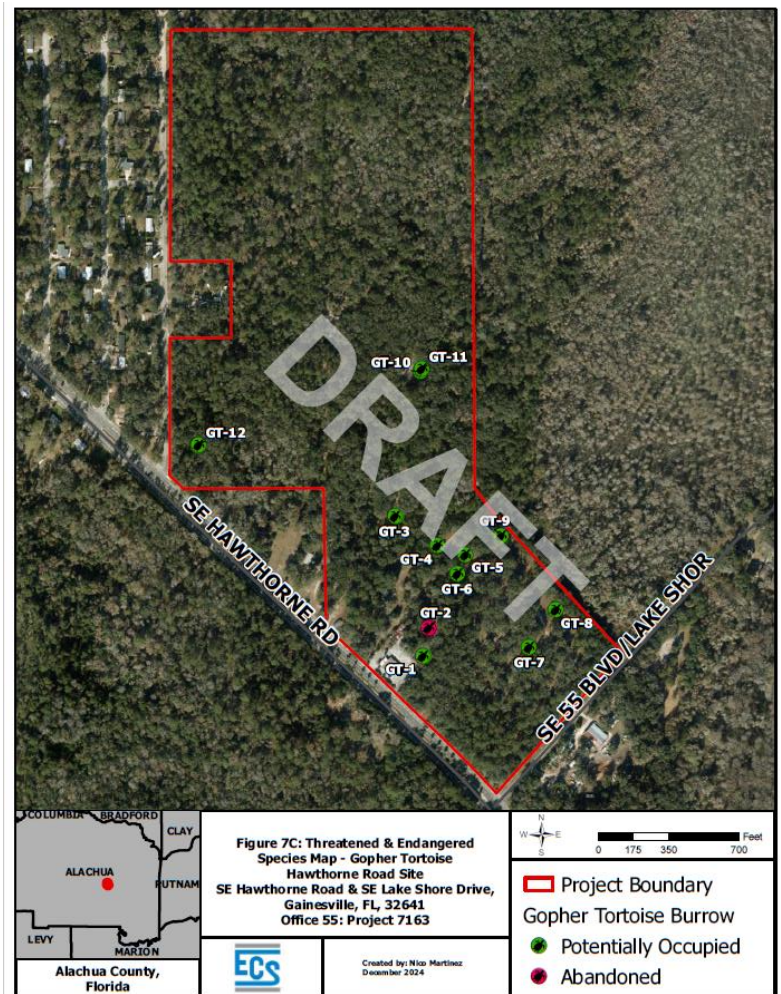
Based on EPD staff review of the site, the upland habitat within the designated SE overlay map qualify for classification as *Significant Habitat*. Even though there are upland areas further south of the SE overlay map boundary have some quality tree canopy specimens, there is limited diversity of desired tree species, insufficient native herb coverage, and reduced inter-relationship with wetland habitats to classify the southern half of the subject site as *Significant Habitat*. As referenced on the above figure, there are primarily

two invasive exotic plants located within the northwestern portion of the SE; Arrowhead vine (*Synгоніum podophyllum*) and Coral ardisia (*Ardisia crenata*). The coverage of these exotic species decreases the function and benefits of the associated habitat to reduce the overall classification as *Significant Habitat*.

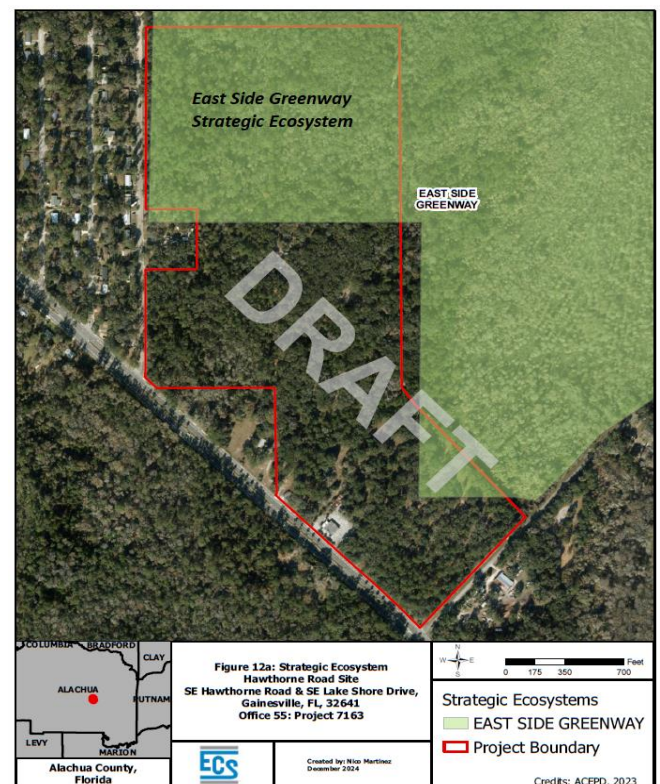
However, there are other referenced factors that would still qualify to classify these areas as SH. In addition, if the proposed project progresses, a “*Conservation Management Area (CMA) Management Plan*” will require eradication and management of these and other exotic and nuisance vegetative species.

Listed Species Habitat (LSH) ***(ULDC - Sec. 406.24)***

As referenced in the ECS report and depicted on the right aerial, there are gopher tortoise burrows (*Gopherus polyphemus*, FL Status -Threatened) reported in the southern half of the subject site. The designation of “*Listed Species Habitat*” shall be delineated based on



consideration and assessment similar to those factors utilized to designate “*Significant Habitat*.” However, evaluation extends further to include if/where the habitat is typically associated with the documented listed species and if/where the anticipated listed species population on the subject site represents a high quantity with minimal risk for being retained on-site. In general, individual gopher tortoises (GT’s) are anticipated to construct and regularly utilize two or more burrows. One burrow is the primary living quarters and the second is typically close to the primary burrow and utilized as an escape from potential predators and resting when foraging a further distance from the primary burrow. Recognizing the burrow survey doesn’t represent total coverage of the subject site, in general the dozen located burrows can anticipate to have 50% occupancy which would result in approximately six individual GT’s. The habitat associated with the GT burrows (“*Hardwood Conifer Mix*”) are comprised of opportunistic hardwoods (e.g. laurel oak) and pines with minor grass/sedge ground coverage that regenerated between periods of rotational tree management. Even though this habitat supports the presence of some individual GT’s, it is not typically associated with this species. On-site protection measures of the GT’s will be evaluated by ECS, FWC, and EPD staff to evaluate and determine the appropriate measures to ensure survivorship. This may result in requiring the applicant to obtain FWC permit approval to relocate the GT’s to approved Conservation Banks. All GT and any other listed species shall comply with applicable State and County regulations, performance standards, and management guidelines.



Conservation Management Area (CMA) ***(ULDC - Sec. 406.95)***

During PDP phase, the locations and boundaries of designated CMA’s are evaluated for the presence of appropriate intact vegetation, including canopy, understory, and groundcover where applicable, in functional, clustered arrangement, with logical contiguous boundaries to eliminate or minimize fragmentation to the greatest extent practicable. Where alternative sites exist, the site or sites selected for onsite protection shall be the

best suited to preserve ecological integrity, maximize use by wildlife and maintain the long-term viability of natural plant or animal communities. The determination are primarily based upon the following conditions:

- * *Function and value of natural resources;*
- * *Quality and condition of natural resources;*
- * *Protectability and manageability;*
- * *Size and shape (emphasis should be on avoiding enclaves of development or areas; fragmented by development; and, on providing, where appropriate, adequate buffers from the secondary impacts of development and adequate wildlife corridors);*
- * *Contiguity with adjacent existing habitat, functional wetland system, floodplain, or habitat corridor;*
- * *Existing species population sizes and life history requirements;*
- * *Proximity and accessibility to other populations of the same species;*
- * *Compatibility of conservation with adjacent land uses; and*
- * *Recommendations from the Florida Fish and Wildlife Conservation Commission and other appropriate agencies.*

As previously depicted, if this proposed project proceeds into the PDP phase, with possibly the exception of the 1.5-2.0 acres along the southeastern SE boundary, the anticipated CMA designation would be the associated +/- 31 acres depicted within the SE overlay (above figure). If that occurs, the protection and enhancement of the associated habitats will be addressed within a *CMA Management Plan* and associated *Conservation Easement*.

Department of Public Works

PW has no issues to allowing the CPA/rezoning.

The following comments will need to be addressed at Development Review Committee review level.

The parcel has FEMA designated 100-year flood plain on the property and will be evaluated per Chapter 406 Article VII Flood Hazard areas of the Land development Code.

The property will be evaluated for stormwater basin requirements for stormwater quantity per Chapter 407 Article IX Stormwater Management of the Land development Code .

The driveway connections to SE 51st Street and Lakeshore Drive will be evaluated per Chapter 407 Article XIII Access Management and Street network standards of the Land development Code.

Transportation

No comment.

Fire/Rescue

No comment.