

# **Application Z25-000003**

## **Application Details**

### **Staff Contact**

Mehdi J. Benkhatar, AICP

### **Staff Phone Number**

352-374-5249 ext. 5261

### **Planning Commission Hearing Date**

April 16, 2025

### **Board of County Commissioners Hearing Date (transmittal)**

May 27, 2025

### **Board of County Commissioners Hearing Date (adoption)**

August 12, 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.

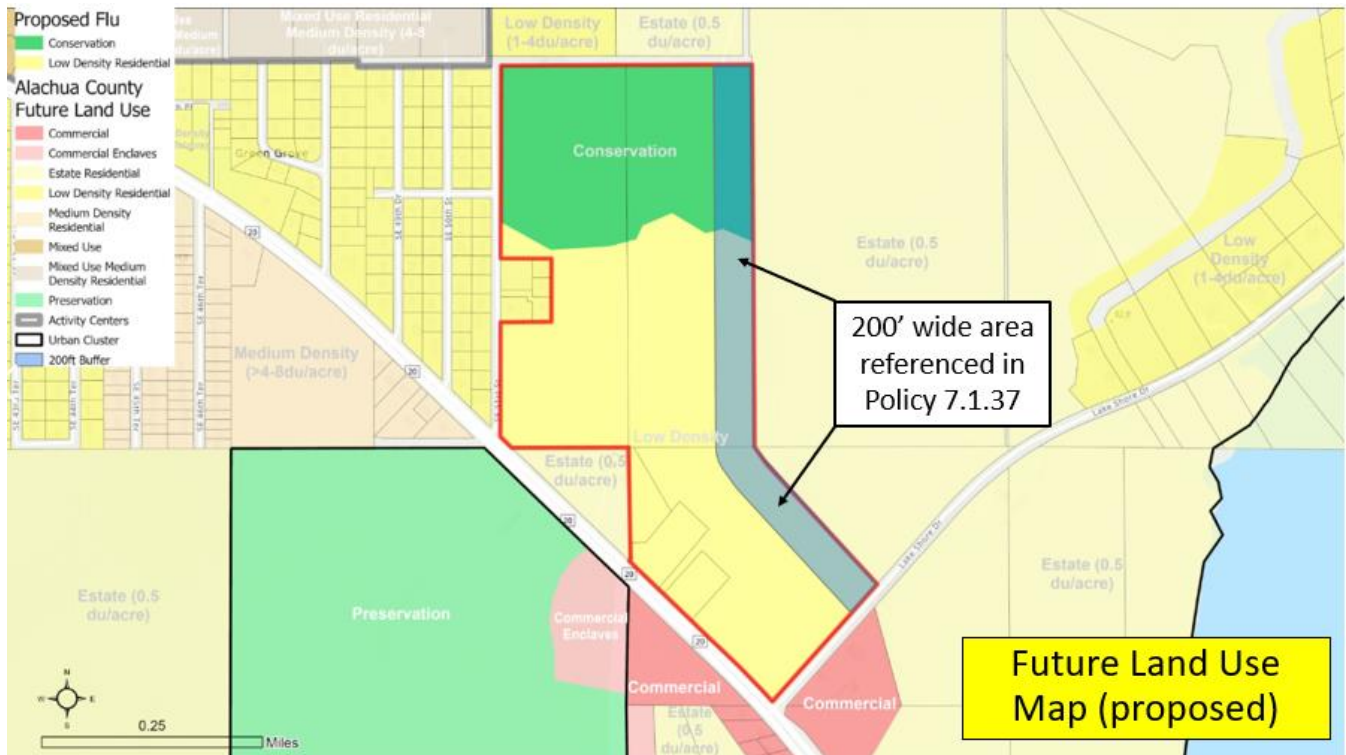
## Project Timeline

- Submitted: February 24, 2025
- Staff Report Distributed: April 11, 2025
- Planning Commission Hearing: April 16, 2025
- Board of County Commissioners Transmittal Hearing: May 27, 2025

## Staff Recommendation

Staff recommends that the Board of County Commissioners **approve** Z25-000003, with the bases as listed in the staff report and *with the addition of a text amendment to the Comprehensive Plan, Policy 7.1.37 of the Future Land Use Element as amended below. The strikethrough and underline of the text amendment show what has been changed since the transmittal to the Florida Department of Commerce and other reviewing agencies on 5/28/25.*

**Policy 7.1.37** The approximately 82-acre property on SE Hawthorne Road (SR 20) consisting of tax parcels 16184-000-000, 16185-000-000, 16201-004-000, 16194-001-000, 16194-002-000 and 16194-000-000 is designated Conservation and Low Density Residential on the Future Land Use Map with primary uses limited to single family detached residential at a maximum of 149 units. ~~The easternmost 200 feet of the proposed map change area shall not include~~ No roadways or residential lots shall be located within 200 feet of the eastern boundaries of parcels 16185-000-000 and 16194-000-000 (where abutting parcels 16185-001-000 and 16194-003-000). ~~and~~ This area will be limited to a combination of green spaces, stormwater management areas, tree preservation areas and necessary utility infrastructure and shall not be fenced to contribute to a larger off-site north-south greenway / wildlife corridor.



*Figure 1: Depiction of 200' area referenced in proposed FLUE Policy 7.1.37*

Based on comments from the Florida Department of Commerce during the review period following transmittal on 5/28/25, staff revised the language in proposed FLUE Policy 7.1.37 to provide more clarity as to the location of the proposed 200' area that will not contain residential lots or roadways.

### **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).

### **Board of County Commissioners Action (transmittal)**

The Board of County Commissioners voted (5-0) to **transmit Z25-000003** to the Florida Department of Commerce and other agencies for review and comment, with the bases as listed in the staff report, *with the addition of a text amendment to the Comprehensive Plan as follows:*

#### *Future Land Use Element*

**Policy 7.1.37** The approximately 82-acre property on SE Hawthorne Road (SR 20) consisting of tax parcels 16184-000-000, 16185-000-000, 16201-004-000, 16194-001-

000, 16194-002-000 and 16194-000-000 is designated Conservation and Low Density Residential on the Future Land Use Map with primary uses limited to single family detached residential at a maximum of 149 units. The easternmost 200 feet of the proposed map change area shall not include roadways or residential lots and will be limited to a combination of green spaces, stormwater management areas, tree preservation areas and necessary utility infrastructure and shall not be fenced to contribute to a larger off-site north-south greenway / wildlife corridor.

# Background

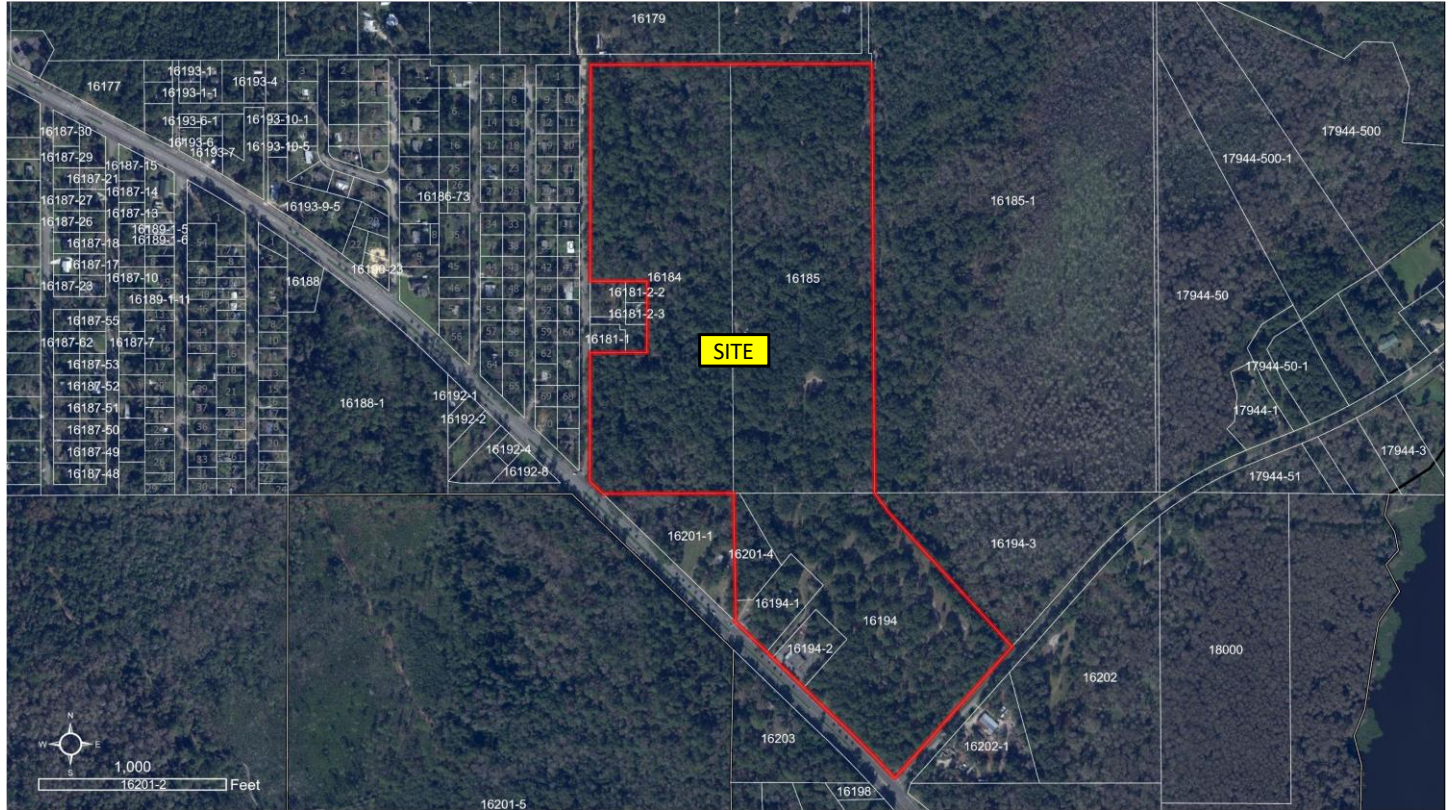


Figure 2: Aerial image of site



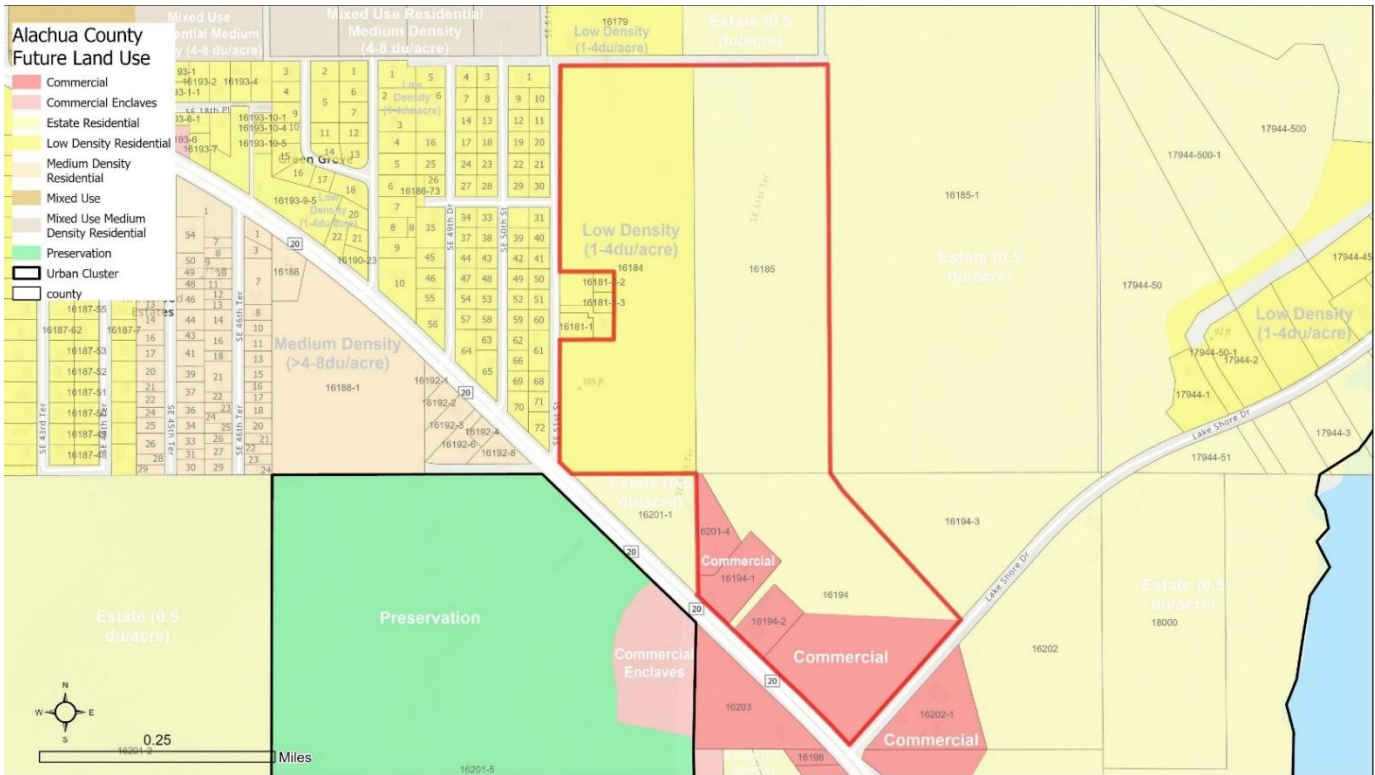


Figure 3: Future Land Use Map (Existing)

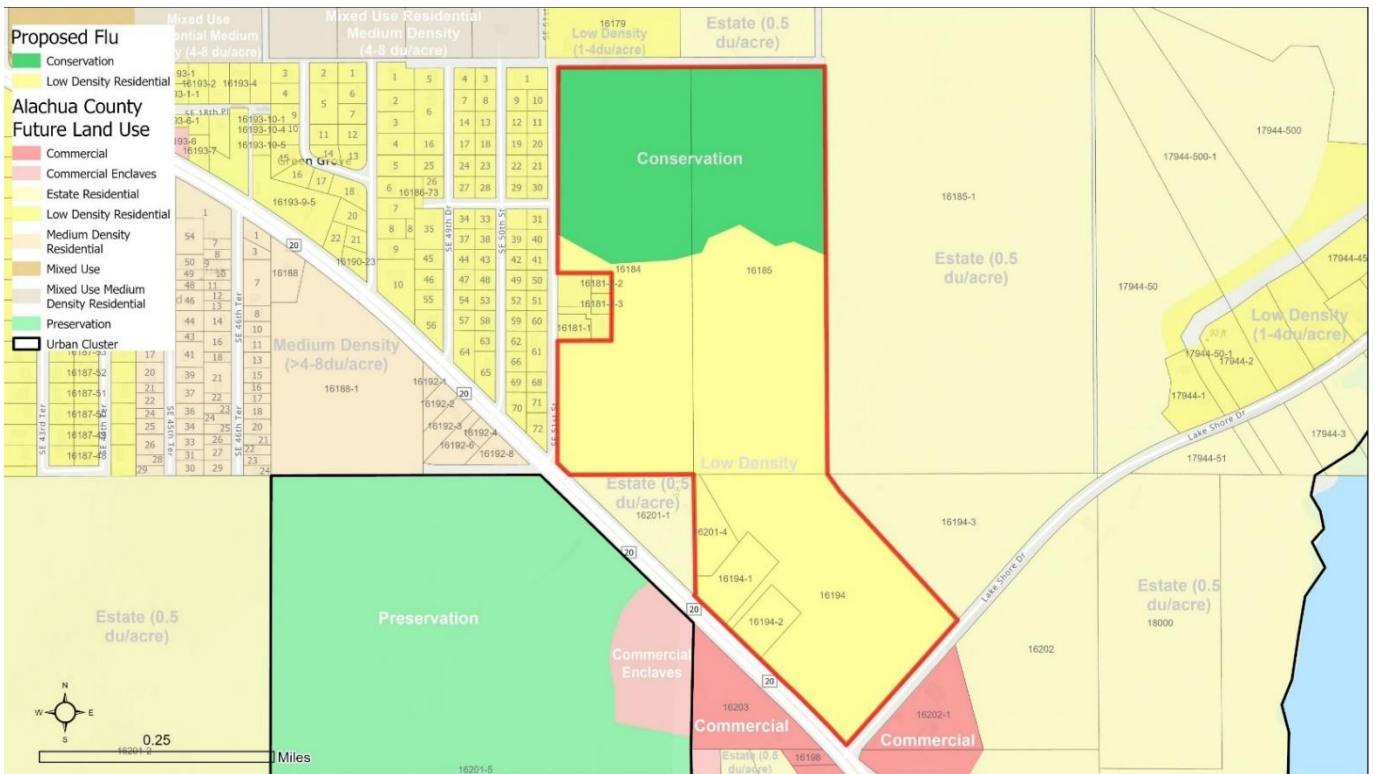


Figure 4: Future Land Use Map (Proposed)

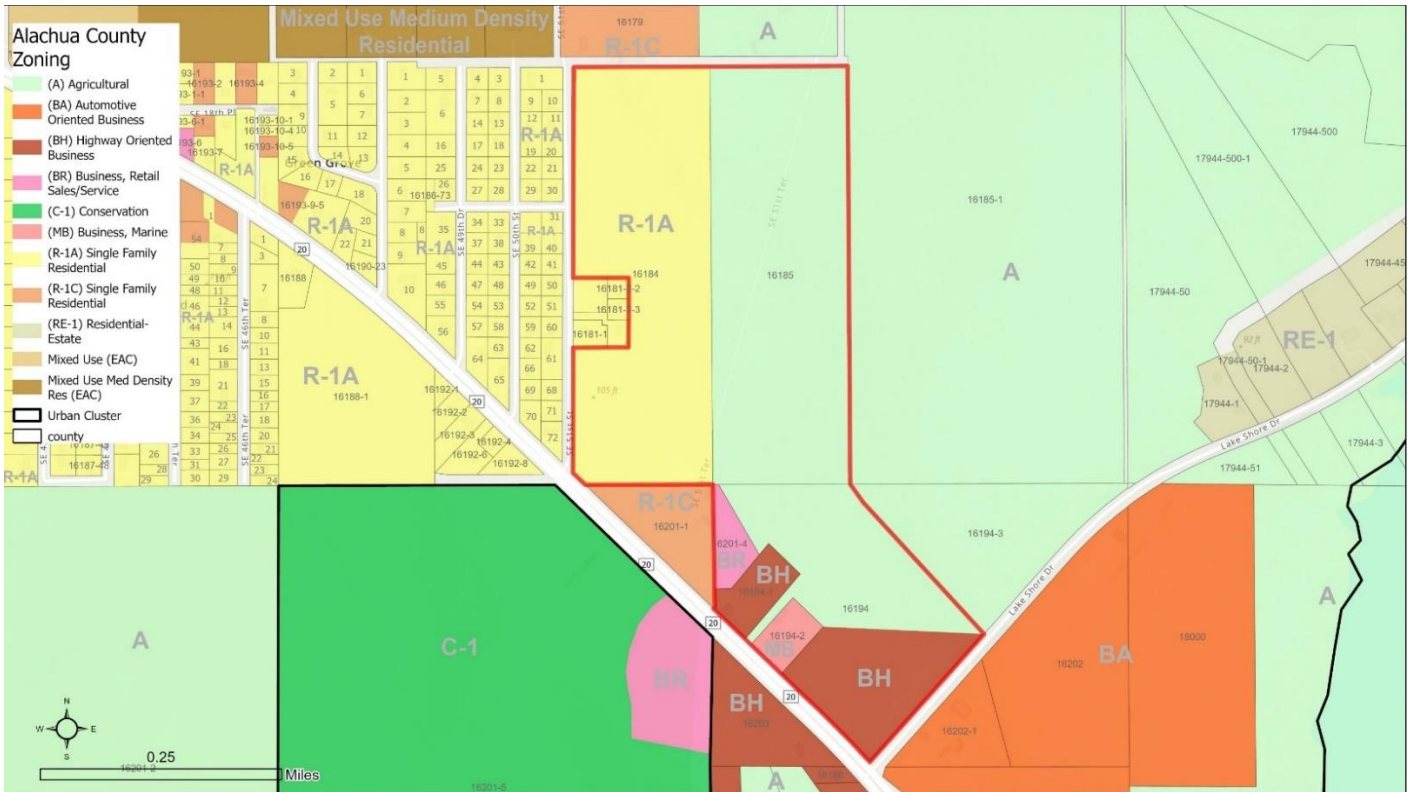


Figure 5: Zoning Map (Existing)

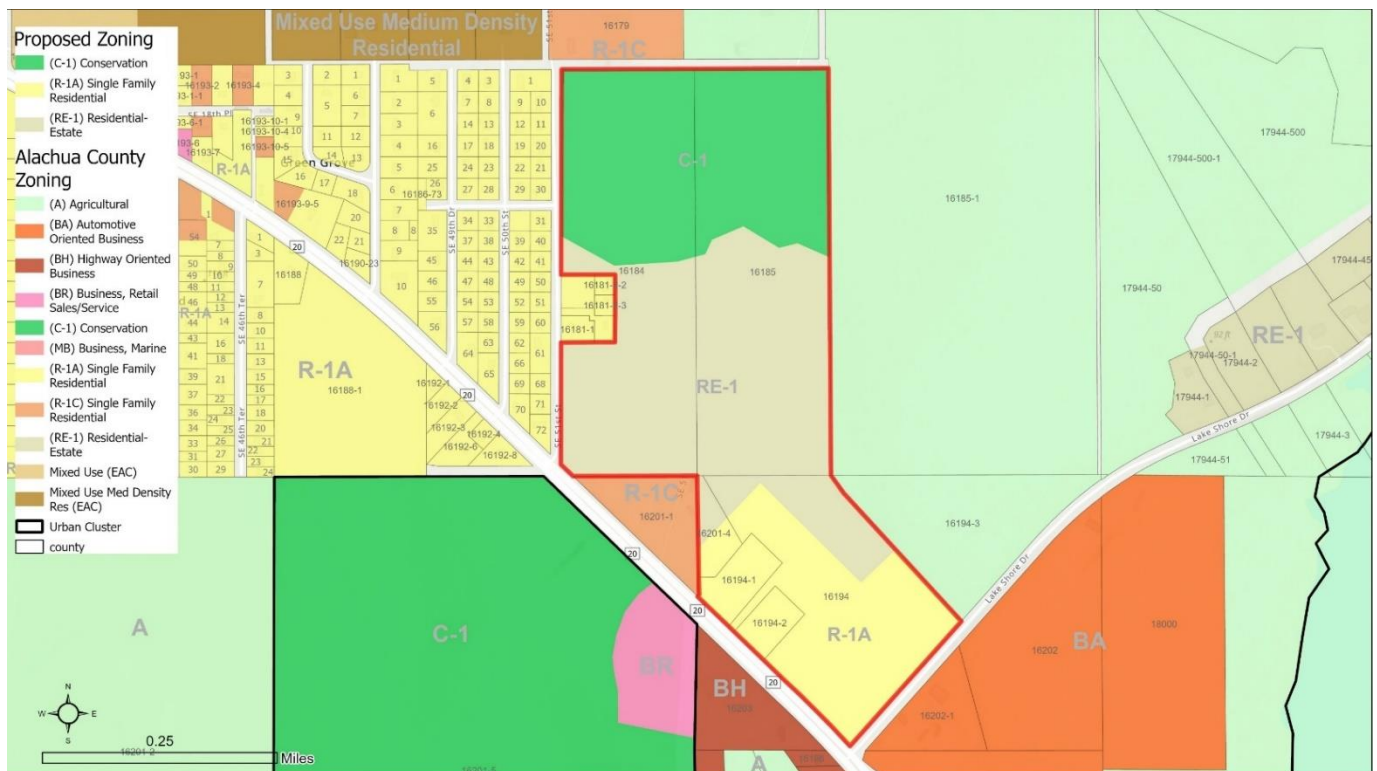


Figure 6: Zoning Map (Proposed in related Z25-000004 application)

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

| <b>FLU Designations</b> | <b>Acres (+/-)</b> | <b>Permitted DU/AC</b> | <b>Maximum Units</b> | <b>Permitted Non-Residential SF/AC</b> | <b>Maximum SF</b> |
|-------------------------|--------------------|------------------------|----------------------|--|-------------------|
| 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 <sup>(1)</sup>            | 124,000 SF        |
| <b>Total</b>            | <b>81.3 Ac.</b>    |                        | <b>131 Units</b>     |  | <b>124,000 SF</b> |

<sup>(1)</sup> 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        |
| <b>Total</b>            | <b>81.3 Ac.</b> |                 | <b>221 Units*</b> |                                 | <b>0 SF</b> |

\*This maximum is restricted to 149 units based on the proposed text amendment, Policy 7.1.37 of the Future Land Use Element (see page 2)

## Summary of Net Change between Existing and Proposed FLU Map

|                   | Residential Units | Non-Residential SF  |
|-------------------|-------------------|---------------------|
| Existing FLU Map  | 131 Units         | 124,000 SF          |
| Proposed FLU Map  | 149 Units         | 0 SF                |
| <b>Net Change</b> | <b>+18 Units</b>  | <b>- 124,000 SF</b> |

As shown in the last table above, the net change would result in 18 additional units and a complete loss of non-residential area. The applicant's companion rezoning application, Z25-000004, requests zoning districts that reflect this 149 unit limit.

## 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 51<sup>st</sup> St. ends.



*Figure 7 (left): View from Lakeshore Rd. looking south*



*Figure 8 (right): One of the abandoned commercial buildings on-site along SE Hawthorne Rd.*





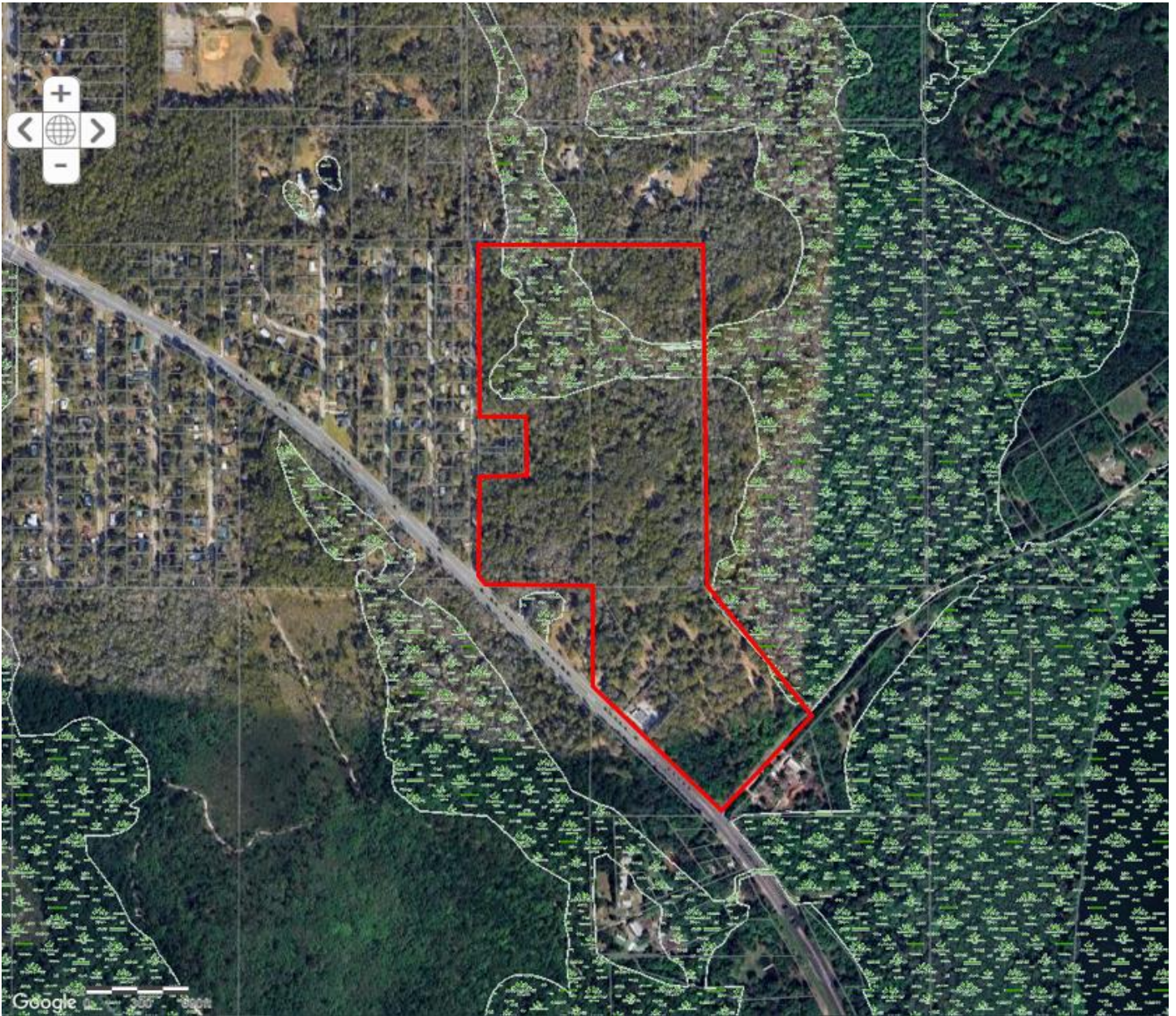
*Figure 9: View near central area of site*





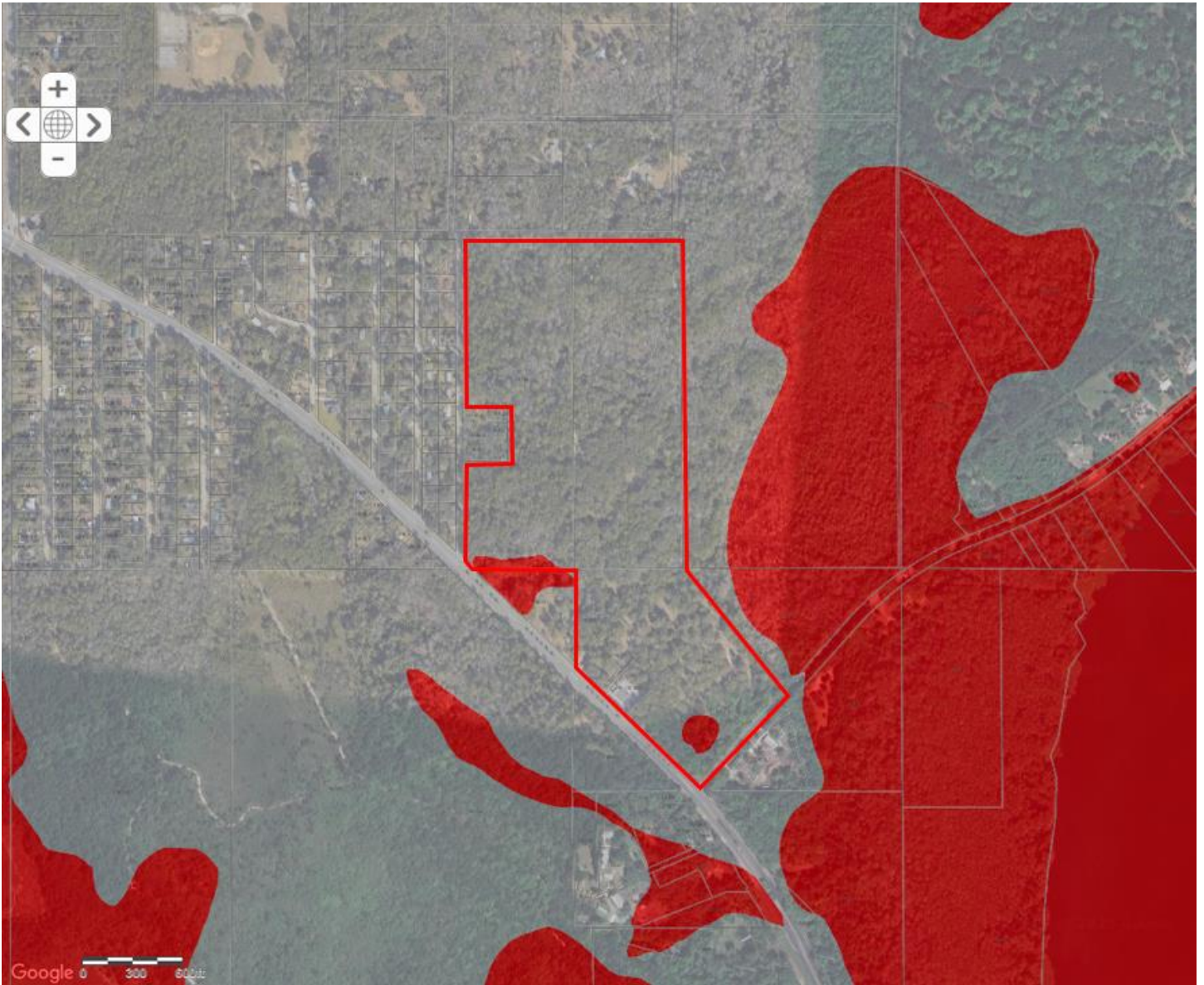
*Figure 10: Additional view from center of site*



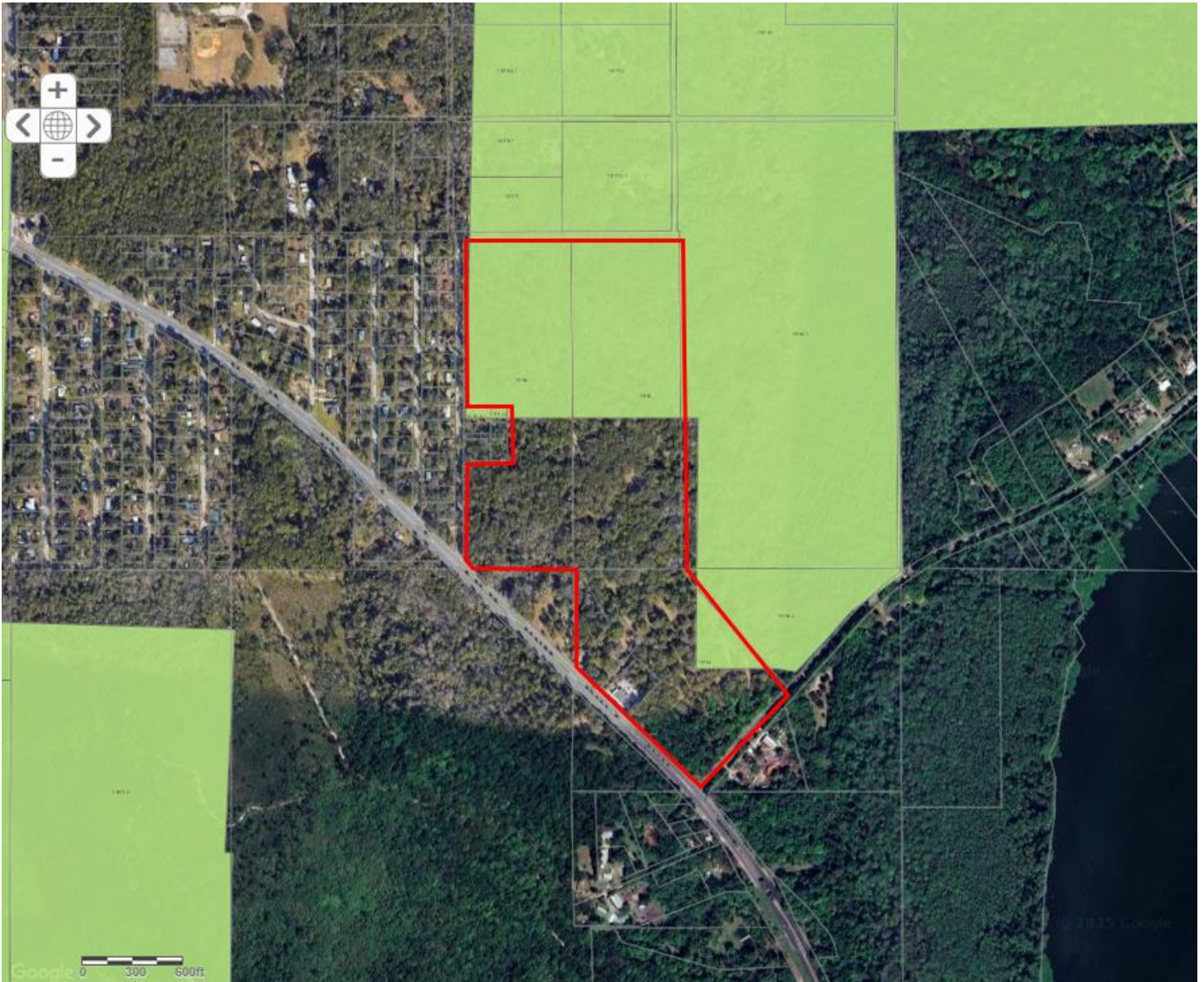


*Figure 11: Wetland Map*





*Figure 12: Flood Zone Map*



*Figure 13: Strategic Ecosystem Map*



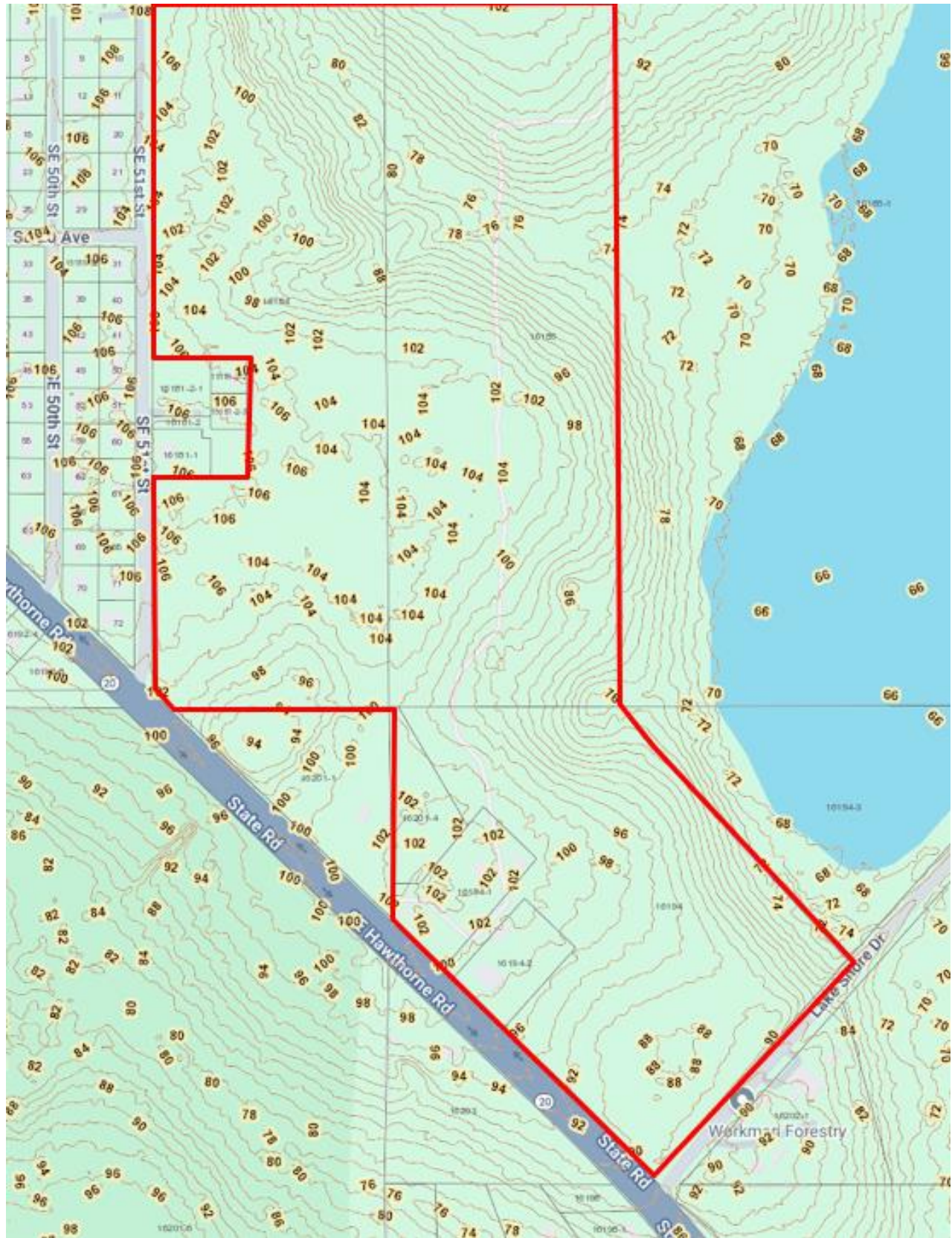


Figure 14: Topographic map

## **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 149 maximum units on an 82 acre site, or from 1.6 units/acre to 1.81 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, 11<sup>th</sup> Edition, an average of 2,084 daily trips would be expected with 221 units. However, with the proposed text amendment accompanying this application, the number of trips would be further reduced to 1,405 based on the maximum number of units (149). 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:

|                           | <b>Peak Residential &amp;<br/>Non Residential</b> | <b>Pressure</b> | <b>Storage Capacity</b> |
|---------------------------|---|-----------------|-------------------------|
| <b>Potable<br/>Water</b>  | 200 gallons/day/du                                | 40 p.s.i.       | ½ peak day volume       |
| <b>Sanitary<br/>Sewer</b> | 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 149. This results in a net increase of 18 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  | 149 | units X 0.12 Elementary School Multiplier | 18 | Student Stations |
| MIDDLE  | 149 | units X 0.06 Middle School Multiplier     | 9  | Student Stations |
| HIGH  | 149 | units X 0.09 High School Multiplier       | 14 | 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 149 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 15: Recreation surplus/deficiency for unincorporated county*

The additional number of units (18 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 43<sup>rd</sup> 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 **approve** Z25-000003, with the bases as listed in the staff report and *with the addition of the text amendment to the Comprehensive Plan, Policy 7.1.37 of the Future Land Use Element, as amended following transmittal to the Florida Department of Commerce and other reviewing agencies.*

## 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

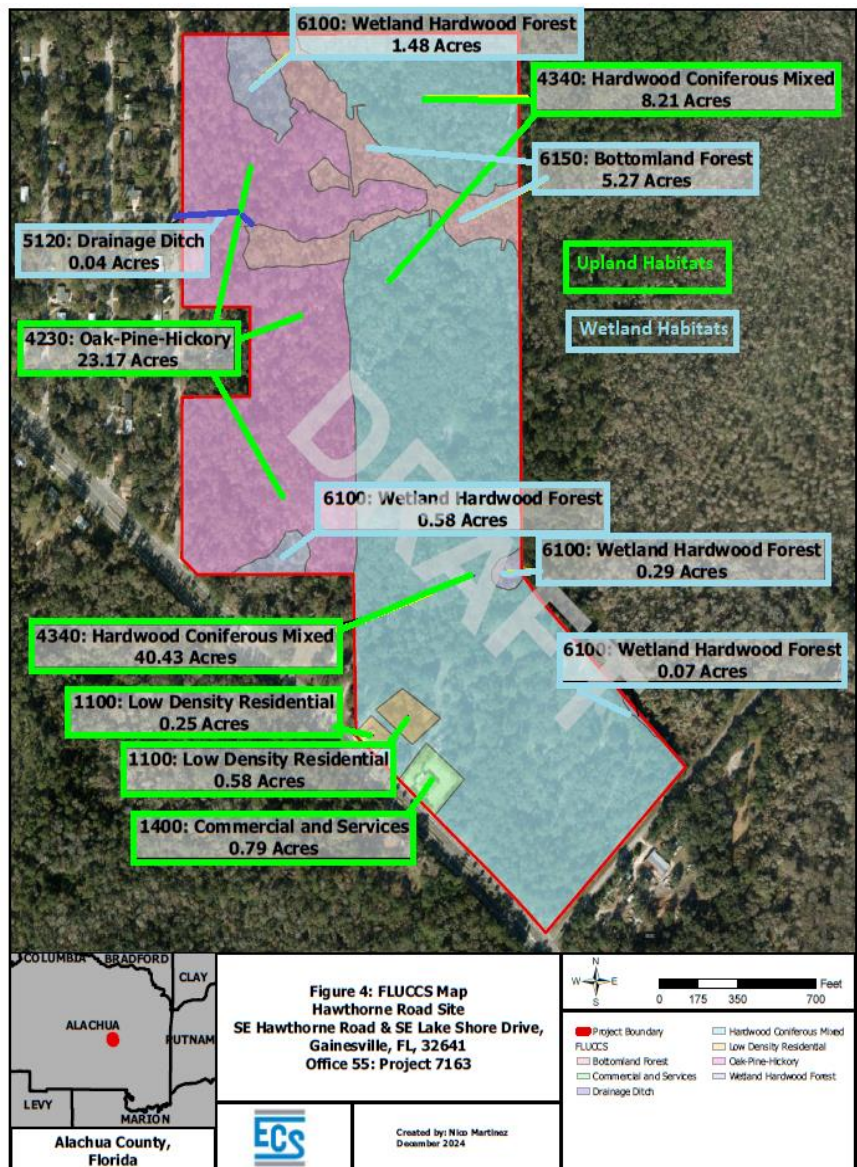
### Department of Environmental Protection

The natural resources of the 82-acre “subject site” were evaluated by an environmental consulting firm (ECS Florida, LLC) during dates between December 17<sup>th</sup> - 23<sup>rd</sup>, 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

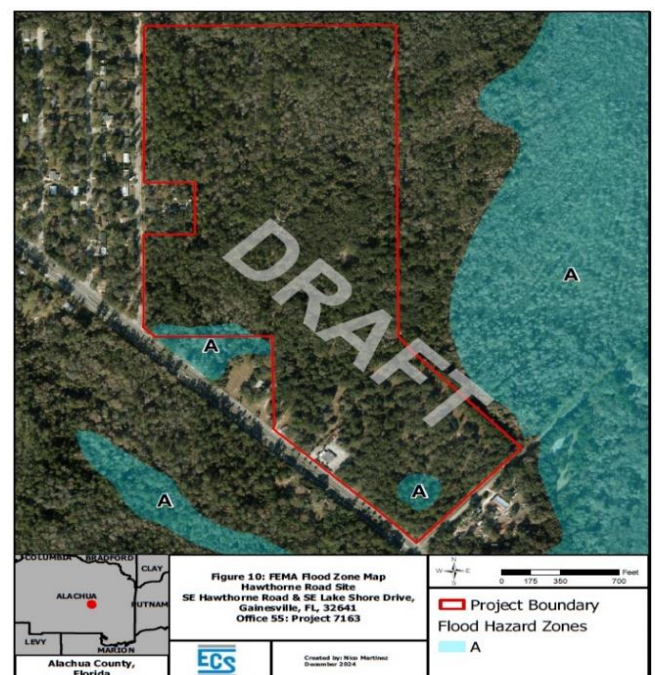
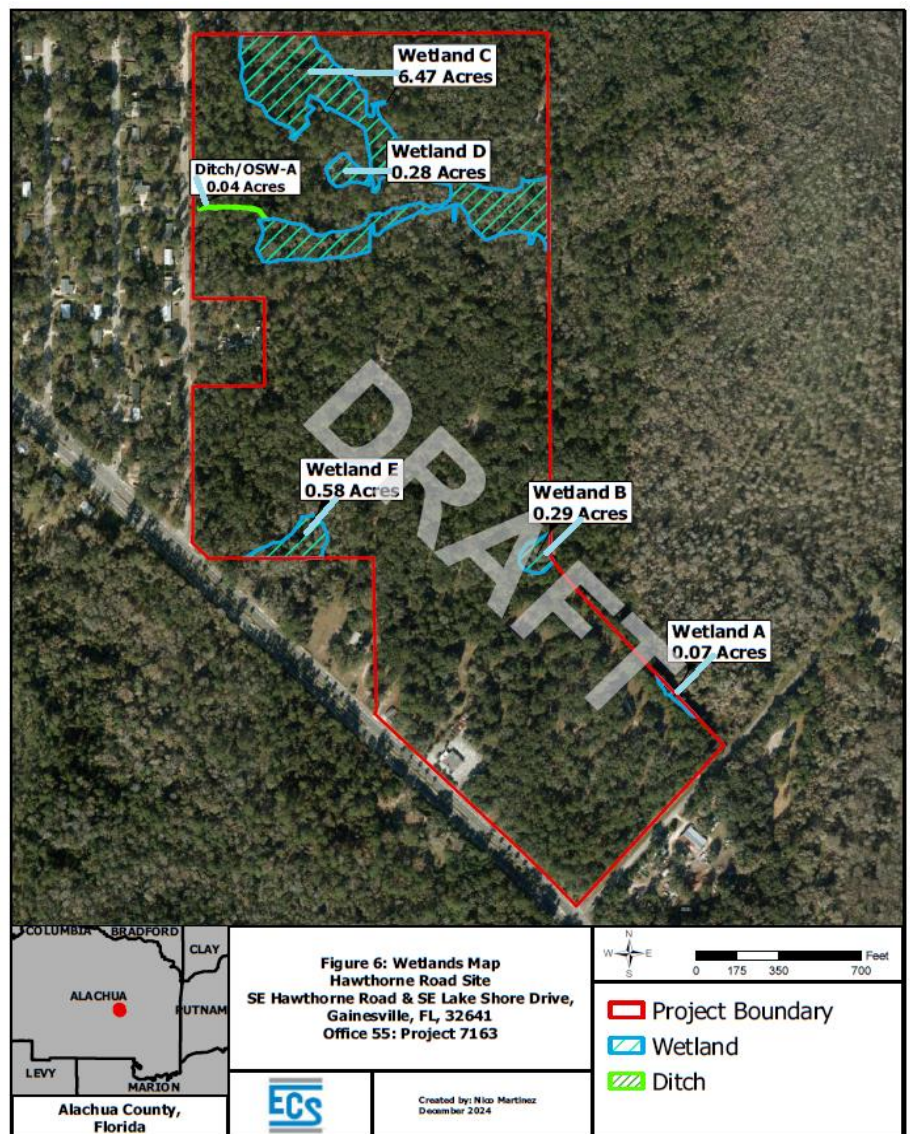




(*Chasmanthium spp*), cinnamon fern (*Osmundastrum cinnamomeum*), Virginia chain fern (*Woodwardia virginica*), arrowhead vine (*Syngonium podophyllum*), coral ardisia, and sphagnum (*Sphagnum spp*).

**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 a 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



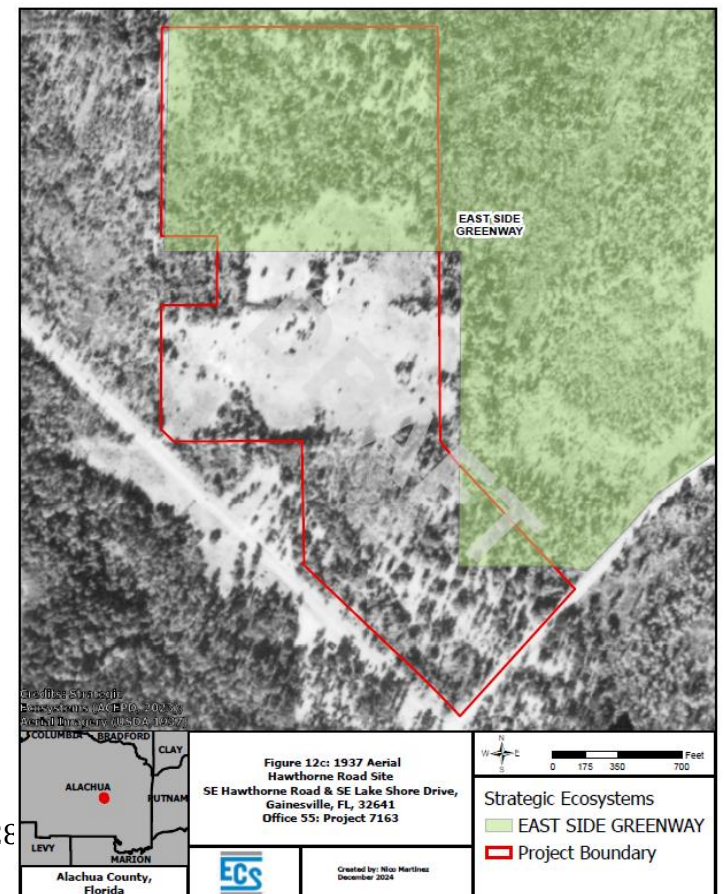
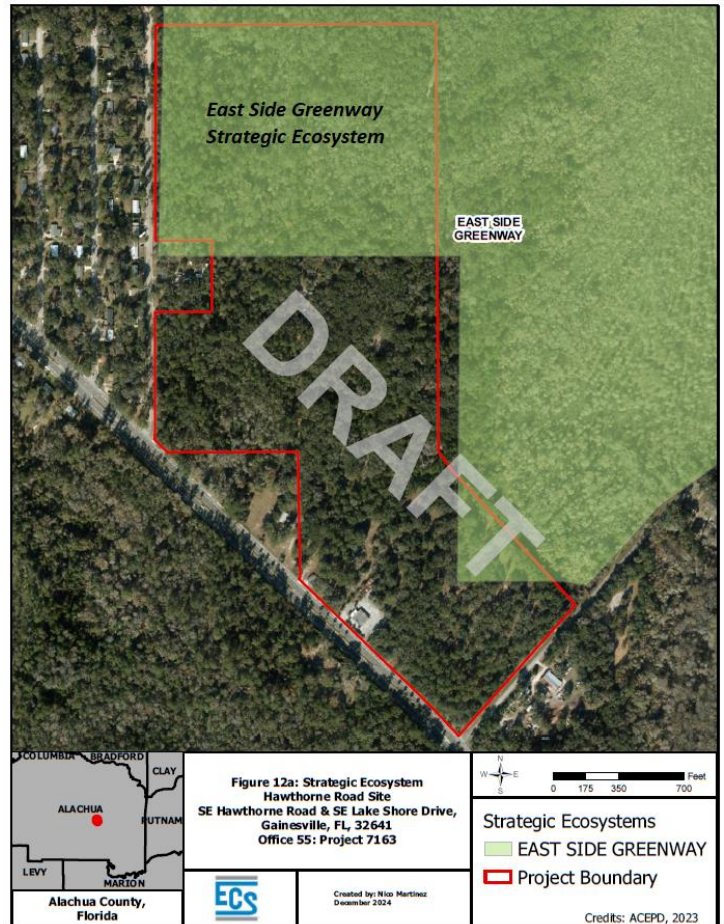


plan that will achieve the average 75 ft., min. 50 ft. wetland buffer requirements (ULDC, Section 406.43).

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 creek wetland floodplain.

### ***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







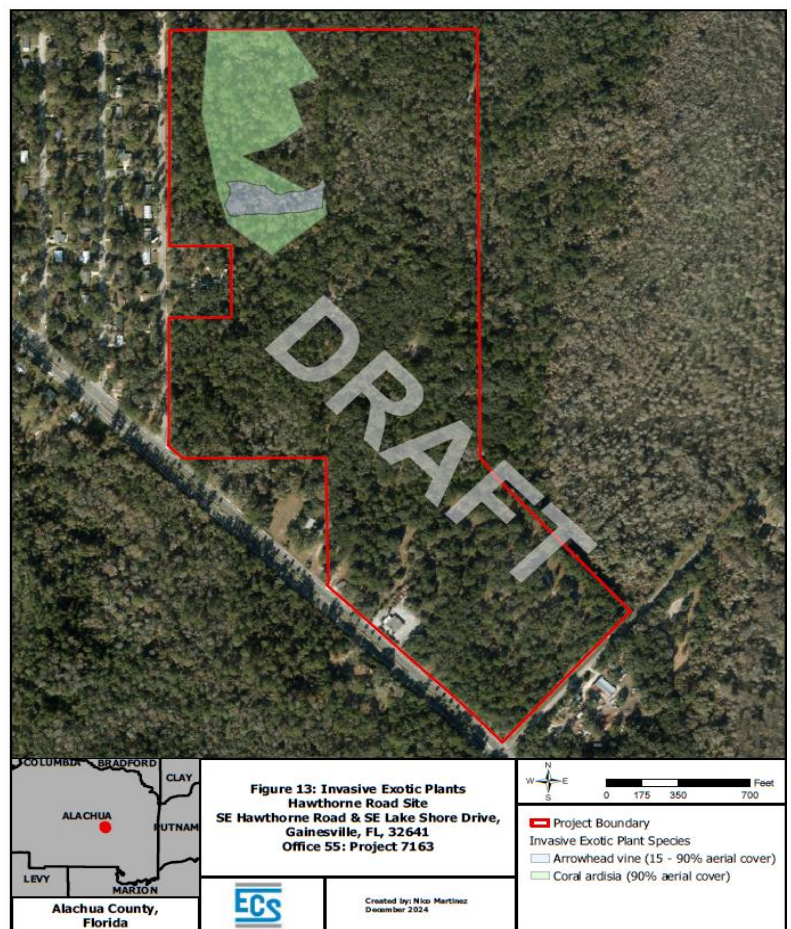
- *Community diversity, rarity, and ecological quality.*
- *Landscape connectivity and overall management potential.*

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.*





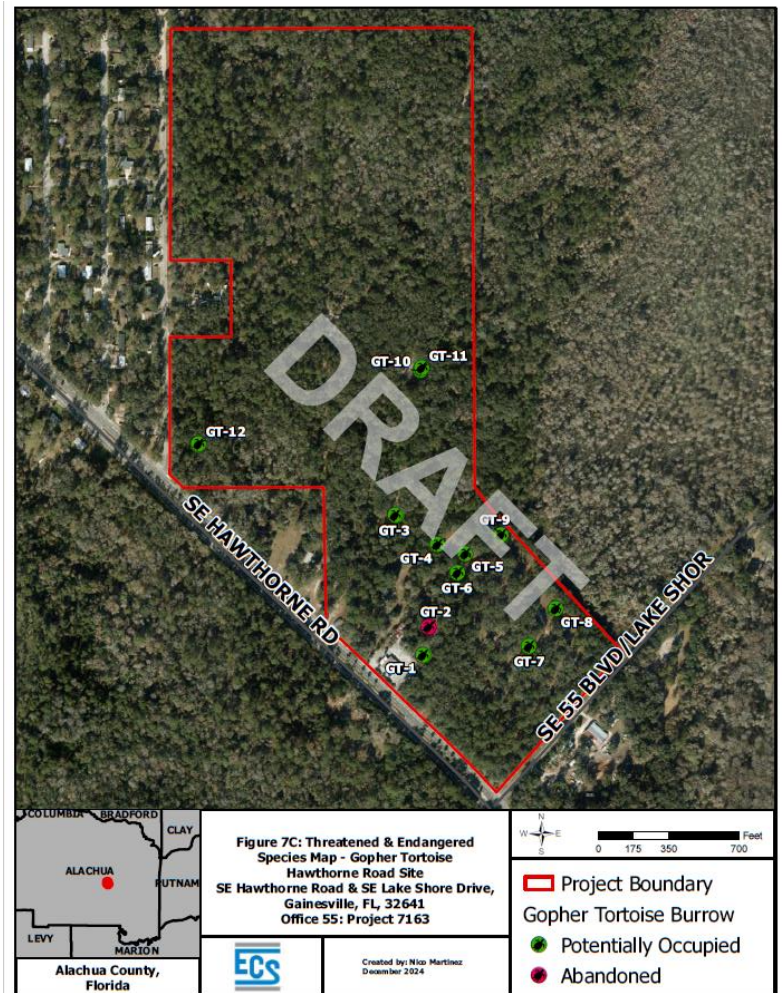
- \* Wildlife habitat value.
- \* Presence of listed or uncommon species.
- \* Grouping, contiguity, compactness of native vegetation.
- \* Proximity to other natural preserve areas and corridors.
- \* Impact by prohibited and invasive non-native vegetation.

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 (*Syngonium 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 the classification of these areas as SH. In addition, if the proposed project progresses, a “*Conservation Management Area (CMA) Management Plan*” will require eradication and management of 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 individuals GT’s. The habitat associated with the GT burrows (“*Hardwood Conifer Mix*”) are comprised 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, EPD and Florida Fish & Wildlife Conservation Commission (FWC) 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. The County and ECS received comments and recommendations from FWC (letter dated June 27, 2025) that reiterated regulations related to the following state & federally listed species:

\*Gopher tortoise (*Gopherus polyphemus*, State Threatened [ST]) burrows. • U.S. Fish and Wildlife Service (USFWS)

\*Consultation Area for the red-cockaded woodpecker (*Picoides borealis*, Federally Threatened [FT])

\* Potential habitat for the tricolored bat (*Perimyotis subflavus*, Proposed Federally Endangered) and eastern indigo snake (*Drymarchon couperi*, FT)

\* Potential habitat for the Florida black bear (*Ursus americanus floridanus* – Central Management Unit)

Additional comments were related to invasive species management and wildlife friendly fencing. EPD staff will coordinate with the applicant’s consultants to ensure FWC’s comments and recommendations are incorporated into the preliminary & final design



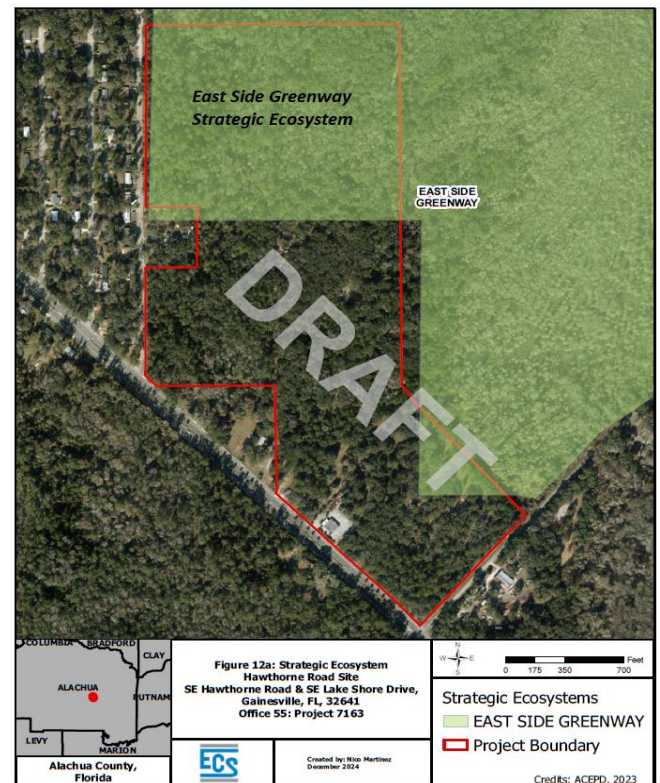
phase plans (PDP, FDP). Specific conditions will also be referenced in the Staff Reports prepared for the two phases.

## ***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 the referenced *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.

## AGENCY COMMENTS



June 27, 2025

The Honorable Charles Chestnut  
Chair, Alachua County  
Board of County Commissioners  
12 Southeast 1<sup>st</sup> Street, 2<sup>nd</sup> Floor  
Gainesville, Florida 32601

Dear Chair Chestnut,

FloridaCommerce has reviewed the Alachua County proposed comprehensive plan amendment (Amendment No. 25-03ESR), received on May 28, 2025, pursuant to the expedited state review process in Section 163.3184(2) and (3), Florida Statutes (F.S.). We have identified no comments related to adverse impacts to important state resources and facilities within FloridaCommerce's authorized scope of review.

We are, however, providing a technical assistance comment consistent with Section 163.3168(3), F.S. The technical assistance comment will not form the basis of a challenge. It is offered either as a suggestion which can strengthen the County's comprehensive plan in order to foster a vibrant, healthy community or is technical in nature and designed to ensure consistency with the Community Planning Act in Chapter 163, Part II, F.S. The technical assistance comment is:

Technical Assistance Comment: Policy 7.1.37: The proposed Policy 7.1.37 states, in part, the easternmost 200 feet of the proposed map change area shall not include roadways or residential lots and will be limited to a combination of green spaces, stormwater management areas, tree preservation areas and necessary utility infrastructure and shall not be fenced to contribute to a larger off-site north-south greenway/wildlife corridor. The eastern property boundary of the amendment area does not run directly north-south but traverses an irregularly shaped line with various areas of the property located farther east than other areas along this line. The County should consider revising the proposed Policy 7.1.37 to establish a meaningful and predictable measurement that clarifies that the 200-foot area shall extend westward from and along the entire eastern property boundary of the Future Land Use Map amendment adopted by Ordinance Number (*insert #*). Alternatively, the County should consider revising the proposed Policy 7.1.37 to adopt by reference a map depicting the location of the 200-foot area.

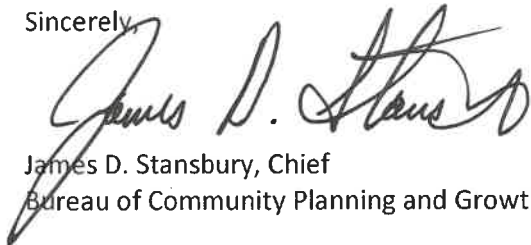
The County should act by choosing to adopt, adopt with changes, or not adopt the proposed amendment. For your assistance, we have enclosed the procedures for adoption and transmittal of the comprehensive plan amendment. In addition, the County is reminded that:

- Section 163.3184(3)(b), F.S., authorizes other reviewing agencies to provide comments directly to the County. **If the County receives reviewing agency comments and they are not resolved, these comments could form the basis for a challenge to the amendment after adoption.**

- **The second public hearing**, which shall be a hearing on whether to adopt one or more comprehensive plan amendments, **must be held within 180 days** of your receipt of agency comments or the amendment shall be **deemed withdrawn** unless extended by agreement with notice to FloridaCommerce and any affected party that provided comment on the amendment pursuant to Section 163.3184(3)(c)1., F.S.
- **The adopted amendment must be transmitted to FloridaCommerce within ten working days after the final adoption hearing or the amendment shall be deemed withdrawn pursuant to section 163.3184(4)(e)2., F.S.** Under Section 163.3184(3)(c)2. and 4., F.S., the **amendment effective date** is 31 days after FloridaCommerce notifies the County that the amendment package is complete or, if challenged, until it is found to be in compliance by FloridaCommerce or the Administration Commission.

If you have any questions concerning this review, please contact Scott Rogers, Regional Planning Administrator, by telephone at (850)-717-8510 or by email at [Scott.Rogers@Commerce.fl.gov](mailto:Scott.Rogers@Commerce.fl.gov).

Sincerely,



James D. Stansbury, Chief  
Bureau of Community Planning and Growth

JDS/sr

Enclosure(s): Procedures for Adoption

cc: Ben Chumley, Principal Planner, Alachua County Department of Growth Management  
Scott Koons, Executive Director, North Central Florida Regional Planning Council

**SUBMITTAL OF ADOPTED COMPREHENSIVE PLAN AMENDMENTS**  
**FOR EXPEDITED STATE REVIEW**

Section 163.3184(3), Florida Statutes

**NUMBER OF COPIES TO BE SUBMITTED:** Please submit electronically using FloridaCommerce's electronic amendment submittal portal "**Comprehensive Plan and Amendment Upload**" (<https://flcom.my.salesforce-sites.com/cp/>) or submit three complete copies of all comprehensive plan materials, of which one complete paper copy and two complete electronic copies on CD ROM in Portable Document Format (PDF) to the State Land Planning Agency and one copy to each entity below that provided timely comments to the local government: the appropriate Regional Planning Council; Water Management District; Department of Transportation; Department of Environmental Protection; Department of State; the appropriate county (municipal amendments only); the Florida Fish and Wildlife Conservation Commission and the Department of Agriculture and Consumer Services (county plan amendments only); and the Department of Education (amendments relating to public schools); and for certain local governments, the appropriate military installation and any other local government or governmental agency that has filed a written request.

**SUBMITTAL LETTER:** Please include the following information in the cover letter transmitting the adopted amendment:

\_\_\_\_\_ State Land Planning Agency identification number for adopted amendment package;

\_\_\_\_\_ Summary description of the adoption package, including any amendments proposed but not adopted;

\_\_\_\_\_ Identify if concurrency has been rescinded and indicate for which public facilities. (Transportation, schools, recreation and open space).

\_\_\_\_\_ Ordinance number and adoption date;

\_\_\_\_\_ Certification that the adopted amendment(s) has been submitted to all parties that provided timely comments to the local government;

\_\_\_\_\_ Name, title, address, telephone, FAX number and e-mail address of local government contact;

\_\_\_\_\_ Letter signed by the chief elected official or the person designated by the local government.



**ADOPTION AMENDMENT PACKAGE:** Please include the following information in the amendment package:

\_\_\_\_\_ In the case of text amendments, changes should be shown in strike-through/underline format.

\_\_\_\_\_ In the case of future land use map amendments, an adopted future land use map, **in color format**, clearly depicting the parcel, its future land use designation, and its adopted designation.

\_\_\_\_\_ A copy of any data and analyses the local government deems appropriate.

**Note:** If the local government is relying on previously submitted data and analysis, no additional data and analysis is required;

\_\_\_\_\_ Copy of the executed ordinance adopting the comprehensive plan amendment(s);

Suggested effective date language for the adoption ordinance for expedited review:

"The effective date of this plan amendment, if the amendment is not timely challenged, shall be 31 days after the state land planning agency notifies the local government that the plan amendment package is complete. If the amendment is timely challenged, this amendment shall become effective on the date the state land planning agency or the Administration Commission enters a final order determining this adopted amendment to be in compliance."

\_\_\_\_\_ List of additional changes made in the adopted amendment that the State Land Planning Agency did not previously review;

\_\_\_\_\_ List of findings of the local governing body, if any, that were not included in the ordinance and which provided the basis of the adoption or determination not to adopt the proposed amendment;

\_\_\_\_\_ Statement indicating the relationship of the additional changes not previously reviewed by the State Land Planning Agency in response to the comment letter from the State Land Planning Agency.

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**Alachua County 25-03ESR Proposed**

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**From** Plan\_Review <Plan.Review@dep.state.fl.us>

**Date** Wed 6/25/2025 5:23 PM

**To** Mehdi J. Benkhatar <mbenkhatar@alachuacounty.us>; dcpextex@commerce.fl.gov  
<dcpextex@commerce.fl.gov>

**Cc** Plan\_Review <Plan.Review@dep.state.fl.us>

**CAUTION:** This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

**To:** Mehdi Benkhatar, Planner III

**Re:** Alachua County 25-03ESR – Expedited State Review of Proposed Comprehensive Plan Amendment

The Office of Intergovernmental Programs of the Florida Department of Environmental Protection (Department) has reviewed the above-referenced amendment package under the provisions of Chapter 163, Florida Statutes. The Department conducted a detailed review that focused on potential adverse impacts to important state resources and facilities, specifically: air and water pollution; wetlands and other surface waters of the state; federal and state-owned lands and interest in lands, including state parks, greenways and trails, conservation easements; solid waste; and water and wastewater treatment.

Based on our review of the submitted amendment package, the Department has found no provision that, if adopted, would result in adverse impacts to important state resources subject to the Department's jurisdiction.

Please submit all future amendments by email to [Plan.Review@FloridaDEP.gov](mailto:Plan.Review@FloridaDEP.gov). If your submittal is too large to send via email or if you need other assistance, contact Lindsay Weaver at (850) 717-9037.



## *Florida Department of Transportation*

RON DESANTIS  
GOVERNOR

2198 Edison Avenue MS 2806  
Jacksonville, FL 32204-2730

JARED W. PERDUE, P.E.  
SECRETARY

June 18, 2025

Mehdi Benkhatar, AICP  
Planner III  
Alachua County Department of Growth Management  
10 SW 2<sup>nd</sup> Ave., 3<sup>rd</sup> Floor  
Gainesville, FL 32601-6294

### **SUBJECT: Alachua County Proposed Comprehensive Plan Amendment (25-03ESR)**

Dear Mr. Chumley,

Pursuant to Section 163.3184(3), Florida Statutes, (F.S.) in its role as a reviewing agency as identified in Section 163.3184(1)(c), F.S., the Florida Department of Transportation (FDOT) reviewed proposed amendment, Alachua County 25-03ESR.

#### **Amendment Summary**

The proposed amendment consists of a Future Land Use Map (FLUM) amendment with a matching text amendment reflecting the map amendment change, which consists of an approximately 82 acre property being redesignated from Low Density Residential, Estate Residential and Commercial to Low Density Residential & Conservation.

This amendment is anticipated to increase the maximum permitted dwelling units on the project site by 90 while reducing commercial intensity by 124,000 sq. ft. As such, it is expected that such a newly proposed buildout can result in approximately 10,000 fewer daily trips compared to current land-use standards. The project site is adjacent to SR-20 Segment 20,14, which currently has an LOS rating of "B", with an maximum service volume (MSV) of 4,350 vehicles & a peak service volume of 941 vehicles in 2023. As the maximum proposed build-out would only generate an approximate of 209 daily trips alongside the adjacent state facility, this amendment is not anticipated to adversely impact any state facilities.

#### **Comments**

FDOT has no comments or technical recommendations.

We appreciate the opportunity to review the proposed comprehensive plan amendments and request that a copy of the adopted amendments, along with the supporting data and analysis, be transmitted within ten working days after the second public hearing for FDOT review.

If you have any questions, please do not hesitate to contact me by email:  
[jacob.linton@dot.state.fl.us](mailto:jacob.linton@dot.state.fl.us) or call: (904) 360-5547.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Linton', with a stylized flourish at the end.

Jacob Linton  
Planner II  
FDOT District Two





## Florida Fish and Wildlife Conservation Commission

### Commissioners

**Rodney Barreto**  
Chairman  
Coral Gables

**Steven Hudson**  
Vice Chairman  
Fort Lauderdale

**Preston Farrior**  
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Executive Director  
**Roger A. Young**  
Executive Director

**Charles "Rett" Boyd**  
Assistant Executive Director

**George Warthen**  
Chief Conservation Officer

**Jessica Crawford**  
Chief of Staff

Division of Habitat and  
Species Conservation  
Melissa Tucker  
Director

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800-955-8771 (T)  
800 955-8770 (V)

MyFWC.com

June 27, 2025

Mehdi Benkhatar  
Alachua County Department of Growth Management  
10 SW 2<sup>nd</sup> Ave., 3<sup>rd</sup> Floor  
Gainesville, Florida, 32601-6294  
[mbenkhatar@alachuacounty.us](mailto:mbenkhatar@alachuacounty.us)

Re: Alachua County 25-03ESR (County Amendment Z25-000003), Comprehensive Plan Amendment

Dear Mr. Benkhatar:

Florida Fish and Wildlife Conservation Commission (FWC) staff reviewed the above-referenced comprehensive plan amendment package and provides the following comments and recommendations for your consideration in accordance with Chapter 163.3184, Florida Statutes. While there are no objections to the amendment, the following technical assistance information is provided to assist the Department of Commerce, the County, and any applicants during the amendment review and future project planning.

### Project Description

The applicants, Gator Country LLC and Bentley Properties, Inc., propose to amend the future land use designation from Low Density Residential, Estate Residential, and Commercial, to Low Density Residential and Conservation designations on an 82-acre property in Alachua County. The proposed change would increase the maximum number of residential units from approximately 131 to 221. The site is located on the north side of Southeast Hawthorne Road, and on the west side of Lake Shore Drive. The proposed project site contains approximately 48.6 acres of mixed hardwood-coniferous, 23.2 acres of oak-pine-hickory, 5.3 acres of bottomland forest, and 2.4 acres of mixed wetland hardwoods. The remaining approximately 2.5 acres include transportation, commercial and services, and low density residential landcovers.

### Potentially Affected Resources

The applicants provided results of site evaluations conducted by ECS Florida, LLC, December 17-23, 2024. The survey results indicated the site contains potentially occupied gopher tortoise (*Gopherus polyphemus*, State Threatened [ST]) burrows. ECS Florida, LLC recommends the applicant conduct 100% pre-construction surveys for gopher tortoise, and to obtain a relocation permit if tortoises are present. FWC staff conducted a geographic information system (GIS) analysis of the project area. The analysis found that the project area is located near, within, or adjacent to:

- U.S. Fish and Wildlife Service (USFWS) Consultation Area for the red-cockaded woodpecker (*Picoides borealis*, Federally Threatened [FT])
- Potential habitat for the tricolored bat (*Perimyotis subflavus*, Proposed Federally Endangered) and eastern indigo snake (*Drymarchon couperi*, FT)
- Potential habitat for the Florida black bear (*Ursus americanus floridanus* – Central Management Unit)

- Existing Conservation Areas: Paynes Prairie Preserve State Park (Florida Department of Environmental Protection) and Palm Point Nature Park (City of Gainesville)

## Comments and Recommendations

### Gopher Tortoise

Due to the documented presence of gopher tortoises on site, FWC staff recommends that the applicant refer to the *Gopher Tortoise Permitting Guidelines* (revised April 2023) (<http://www.myfwc.com/license/wildlife/gopher-tortoise-permits/>) for permitting guidance. Specifically, the permitting guidelines include methods for avoiding impacts (such as preservation of occupied habitat) as well as options and state requirements for minimizing, mitigating, and permitting potential impacts of the proposed activities. Any commensal species observed during burrow excavation should be handled in accordance with Appendix 9 of the *Guidelines*. For questions regarding gopher tortoise permitting, contact Jessica Folsom by phone at (850) 921-1020 or at [Jessica.Folsom@MyFWC.com](mailto:Jessica.Folsom@MyFWC.com).

### Florida Black Bear

The FWC has received 21 reports of human-bear conflicts within a 5-mile radius of the project site since 2015. Florida black bears are frequent in this area which is within the Central BMU identified in the 2019 Bear Management Plan. While black bears tend to shy away from people, they are adaptable and will take advantage of human-provided food sources. This includes sources that are currently available near this site, sources that may be available during construction, and sources available after construction including unsecured garbage, pet food, and bird seed. Once bears become accustomed to finding food around people, their natural wariness is reduced to the point that there can be an increased risk to public safety or private property.

Proactive planning may help prevent or reduce future conflicts with bears. Site designs for larger developments should locate conservation areas along the borders of developed areas, to avoid encouraging bears to forage within developed areas (<http://myfwc.com/wildlifehabitats/managed/bear/crossings/>). If a homeowners' association or community covenants are planned, by-laws that would require residents to take measures to prevent attracting bears into the neighborhood are recommended. Sample by-law language used by other Florida communities is available at (<http://myfwc.com/wildlifehabitats/managed/bear/living/community-group/bylaw/>).

During construction, construction sites should be kept clean, with refuse that might attract bears kept separate from construction debris and stored securely in bear-resistant containers or removed daily from the construction site before dark. Refuse that might attract bears includes all food and drink-related materials, as well as any items with strong scents like cleaning agents. Once the development is completed, residents should be provided with bear-resistant garbage cans as part of their regular waste service and any larger waste storage containers should also be bear-resistant. Providing residents with information on how to avoid human-bear conflicts is also recommended. This information can include:

- Options for keeping garbage secure which can include using bear-resistant garbage containers, modifying regular containers to be bear-resistant, or keeping containers secure in a garage or sturdy shed and then placing garbage on the curb the morning of pick-up rather than the night before (<http://myfwc.com/wildlifehabitats/managed/bear/living/attractants/>);
- Removing bird and wildlife feeders, or modifying them to exclude bears (<http://myfwc.com/wildlifehabitats/managed/bear/wildlife-feeders/>);

- Using electric fencing to secure outdoor attractants like fruiting trees/shrubs, gardens, compost, and small livestock (<https://myfwc.com/media/1886/electricfence.pdf>);
- Proper composting in bear range (<https://myfwc.com/media/1888/howtocompostinbearcountry.pdf>);
- Keeping pets safe (<https://myfwc.com/wildlifehabitats/wildlife/bear/living/protect-pets/>); and
- Cleaning and securing barbeque grills.

Information should also include guidelines for how residents should respond to bears in the area, such as:

- What to do if they encounter a bear, whether from a distance or at close range,
- How to keep pets and livestock safe in bear range, and
- When and how to contact the FWC regarding a bear issue.

FWC staff is available to assist with residential planning to incorporate the above features. Additional information about Florida black bears can be found on FWC's website at <http://www.myfwc.com/wildlifehabitats/managed/bear>.

#### Invasive Species Management

The proposed amendment indicates that approximately 26.5 acres of land are being considered for conservation land. The *Transmittal Package* indicates arrowhead vine (*Syngonium podophyllum*) and coral ardisia (*Ardisia crenata*) are present within the proposed conservation lands, which are both Class I invasive plants as categorized by the Florida Invasive Species Council (FISC).

Category I plants disrupt the native plant community, and removal and/or treatment are recommended. The University of Florida's Institute of Food and Agricultural Science's (IFAS) publishes helpful guides for identification and control of exotic, invasive plants within Florida, that may assist in control of these species. The guide to *Identification and Control of Coral Ardisia (Ardisia crenata): A Potentially Toxic Plant* can be found at:

<https://edis.ifas.ufl.edu/publication/AG281> and the guide to *Wildland Weeds: Arrowhead Vine, Syngonium podophyllum* can be found at: <https://edis.ifas.ufl.edu/publication/IN530>.

To reduce the potential for negative effects of invasive plants on the site and to adjacent properties, FWC staff recommends:

- Decontamination of equipment before performing management activities onsite,
- Development of a vegetation management plan to guide invasive, nonnative plant management that includes the use of herbicides, mechanical treatments, groundcover restoration and fire,
- Consideration of an early detection and rapid response (EDRR) approach to controlling nonnative, invasive plant species. FWC's invasive plant resources (<http://myfwc.com/wildlifehabitats/invasive-plants/>) may assist the applicant in developing this plan. An EDRR increases the likelihood that localized invasive populations will be found, contained, and eradicated before they become widely established, avoiding the need for costly long-term control efforts, and
- Coordination with managers of adjacent conservation lands to encourage collaborative resource sharing and synchronized management.

#### Wildlife Friendly Fencing

Fencing serves an important function for wild spaces including controlling the movement of wildlife, delineating property boundaries, and preventing trespassing. For the proposed conservation lands, the *Transmittal Package* did not indicate whether or what type of site fencing



will be used. The installation of excessive fencing that impedes wildlife movement across the landscape is discouraged. FWC staff recommends the following design considerations, where fencing is necessary, to minimize the potential for wildlife entrapment, injury, or death:

- Avoid the use of woven wire fencing or maintain 12 inches between the top and adjacent barbwire strand,
- Adjust the height of the top wire so that it is no more than 40 to 42 inches high,
- Replace the top one or two strands and the bottom strand with smooth wire or a wood rail,
- Leave 12 inches between the top two wires and at least 18 inches between the bottom wire and the ground, and
- Increase visibility of smooth/barbwire by adding small sections of white PVC pipe or metal tags which will alert wildlife to the barrier.

Additional information on wildlife-friendly fencing can be found in the FWC Landowner Assistance Program guide to *Wildlife-Friendly Fencing* at (<https://myfwc.com/media/26928/wildlife-friendly-fencing.pdf>).

#### Federal Species

This site may also contain habitat suitable for the federally listed species identified above. FWC staff recommends coordination with the USFWS Florida Ecological Services Office (ESO) as necessary for information regarding potential impacts to these species. The USFWS ESO can be contacted at [FW4FLESRegs@fws.gov](mailto:FW4FLESRegs@fws.gov).

FWC staff appreciates the opportunity to provide input on this project and look forward to working with the applicant throughout the permitting process. For specific technical questions regarding the content of this letter, please contact Melissa Lannan by phone at (850) 274-3039, or by email at [Melissa.Lannan@MyFWC.com](mailto:Melissa.Lannan@MyFWC.com). All other inquiries may be sent to [ConservationPlanningServices@MyFWC.com](mailto:ConservationPlanningServices@MyFWC.com).

Sincerely,



Josh Cucinella  
Land Use Planning Program Administrator  
Office of Conservation Planning Services

jc/ml

Alachua County 25-03ESR\_63107\_06272025

cc: Donna Harris, Florida Department of Commerce, [donna.harris@commerce.fl.gov](mailto:donna.harris@commerce.fl.gov)  
[DCPexter@Commerce.fl.gov](mailto:DCPexter@Commerce.fl.gov)  
Chrissy Carr, ECS Florida, LLC, [CCarr@ecslimited.com](mailto:CCarr@ecslimited.com)  
Jason Adams, ECS Florida, LLC, [JAdams2@ecslimited.com](mailto:JAdams2@ecslimited.com)

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## Alachua County proposed comprehensive plan amendment 25-03ESR

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From Steve Fitzgibbons <SFitzgibbons@sjrwmd.com>

Date Mon 6/23/2025 10:01 AM

To Mehdi J. Benkhatar <mbenkhatar@alachuacounty.us>; Chris Dawson <cdawson@alachuacounty.us>

Cc dcpexter@commerce.fl.gov <dcpexter@commerce.fl.gov>

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Dear Mehdi Benkhatar,

St. Johns River Water Management District (District) staff have reviewed Alachua County proposed comprehensive plan amendment 25-03ESR in accordance with the provisions of Chapter 163, Florida Statutes. Based on review of the submitted materials, District staff have no comments on the proposed amendment.

If you have any questions or need additional information, please contact me.

Sincerely,  
Steve Fitzgibbons

Steven Fitzgibbons, AICP  
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St. Johns River Water Management District  
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[www.sjrwmd.com/ePermit](http://www.sjrwmd.com/ePermit)

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- Individuals lobbying the District must be registered as lobbyists (§112.3261, Florida Statutes). Details, applicability and the registration form are available at <http://www.sjrwmd.com/lobbyist/>