

September 8, 2022

The Honorable Lauren Poe
Mayor, City of Gainesville
City Hall
200 East University Avenue
Gainesville, Florida 32601

Dear Mayor Poe:

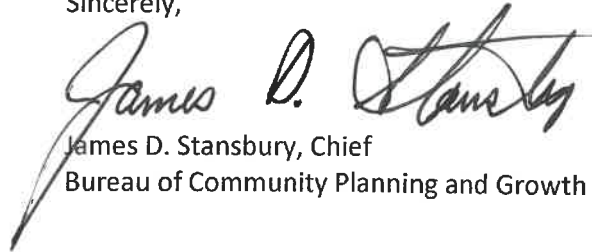
The Department of Economic Opportunity (“Department”) has reviewed the City of Gainesville’s proposed comprehensive plan amendment (Amendment No. 22-03ESR), received on August 11, 2022, pursuant to the expedited state review process in section 163.3184(2) - (3), Florida Statutes (F.S.). We have identified a comment related to adverse impacts to important state resources and facilities within the Department’s authorized scope of review. The Agency’s comment regarding these amendments is attached to this letter.

The City 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 City is reminded that:

- Section 163.3184(3)(b), F.S., authorizes other reviewing agencies to provide comments directly to the City. If the City 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plan amendments, must be held within 180 days of your receipt of agency comments or the amendment shall be deemed withdrawn unless extended by agreement with notice to the Department and any affected party that provided comment on the amendment pursuant to section 163.3184(3)(c)1.,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 rendered to the Department. Under section 163.3184(3)(c)2. and 4., F.S., the amendment effective date is 31 days after the Department notifies the City that the amendment package is complete or, if challenged, until it is found to be in compliance by the Department or the Administration Commission.

If you have any questions concerning this review, please contact Barbara Powell, Regional Planning Administrator, by telephone at (850) 717-8504 or by email at barbara.powell@deo.myflorida.com.

Sincerely,



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

JDS/ bp

Enclosure(s): Procedures for Adoption

cc: Andrew Persons, Director, City of Gainesville, Sustainable Development
Scott Koons, Executive Director, North Central Florida Regional Planning Council

Comment 1: The proposed amendment is internally inconsistent with the City's comprehensive plan pursuant to section 163.3177 (2), F.S. This inconsistency is of such a manner as to adversely impact the provision of affordable housing for all current and anticipated future residents of the City as required in section 163.3177(6), (f), 3., F.S. Affordable housing is an important state resource. Through the inconsistent planning approach in the City's comprehensive plan, the creation and preservation of this state resource is adversely impacted. The proposed amendment is inconsistent with Housing Element Policies 1.1.5. and 3.1.4. With the inconsistent policies resulting from this amendment, the comprehensive plan does not provide clear principles, guidelines, standards, and strategies that will create and preserve affordable housing within the City. The amendment's contradiction in policies will adversely impact the provision of adequate affordable housing in the City through countervailing planning policies. If adopted, the comprehensive plan will not provide cohesive, clear, meaningful, and predictable planning principles, guidelines, standards, and strategies that reflect, as needed, the creation and preservation of affordable housing. The amendment may endanger the elimination of substandard housing conditions, the provision of adequate sites, and the distribution of housing for a range of incomes and types, including mobile and manufactured homes.

The reliance on this ineffective approach to providing affordable housing in the community is a detriment to the City's overall efforts in this matter. This approach will distract from the City's need to address affordable housing in its comprehensive plan through a directed and focused planning strategy that will provide well-planned access to affordable housing in proximity to employment centers where jobs are available but, in some cases, unfilled because of a lack of accessible affordable housing. The amendment assumes that the allowance of denser development will provide access to affordable housing. However, the scattered location of this denser development is in no way guaranteeing efficient, effective, and directed access to affordable housing. Further, the City's Housing Element Policy 1.1.5 requires the University of Florida (UF) and the private sector be responsible for providing housing for college students. However, data provided by the City indicates that student renters have been the primary beneficiaries of new rental housing built since 2000. Solely increasing the amount of land available for additional density and multifamily housing does not ensure that the ever-increasing student population does not absorb the newly created rental housing rather than providing affordable housing for the City's workforce.

Housing Element Policy 3.1.4. requires the City to help neighborhoods develop plans that address neighborhood character, stability, housing, safety, infrastructure, and historic resources. The City failed to analyze whether the addition of multifamily housing in existing stable neighborhoods is consistent with the plans developed pursuant to the Housing Element policy.

The City did not adequately identify the magnitude of the impact of increasing density from 8 units per acre to 15 units per acre on every parcel currently designated Single-Family. The provision of public facilities such as transportation, schools, potable water, wastewater, stormwater, etc., are connected to the quantity and type of housing. Section 163.3177(3)(a)2., F.S., requires the City's capital improvement element to estimate public facility costs, including a delineation of when facilities will be needed, the general location of the facilities, and projected revenue sources to fund the facilities. Allowing a density of 15 units per acre on numerous scattered parcels across the entirety of the City with no minimum density renders planning for future public facilities challenging. Moreover, increasing density on numerous vacant

lots throughout the City creates the possibility of incremental increases on the needs for services on scattered sites across the City and further complicates planning for public facilities. The proposed plan amendment is not meaningful and predictable as required in section 163.3177(1) F.S.

Section 163.31771, F.S., encourages local governments to adopt an ordinance to allow accessory dwelling units in any area zoned for single-family residential use if that unit will be rented at an affordable rate to an extremely-low-income, very-low-income, low-income, or moderate-income person or persons. The amendment does not address the alternative for addressing affordable housing by allowing accessory units that are affordable, in character, and compatible with single-family uses without the need for construction of denser development that may not be in character.

All the above planning considerations were not addressed with the proposed amendment. The amendment results in a scattered, unplanned, unfocused, and untenable approach to providing affordable housing. This approach may result in fewer opportunities for providing access to affordable housing by strategic properties located near employment opportunities being used for a denser residential use that is still not affordable. Furthermore, the unplanned location of these denser uses throughout the city has made planning for other public facilities, including water, sewer, roads, and schools untenable based on the lack of predictability of the density of the land use.

Recommendation: The amendment must be withdrawn while the City continues to consider a sound planning approach to providing access to affordable housing in a manner that will be strategic, and focused, and based upon sound planning principles that will actually provide guaranteed affordable housing that is accessible from the City's employment centers and not in such a careless way that will result in the opposite effect then the purpose it was proposed for.

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 the Department’s electronic amendment submittal portal “**Comprehensive Plan and Amendment Upload**”

(<https://floridajobs.secure.force.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.



Florida Department of Transportation

RON DESANTIS
GOVERNOR

2198 Edison Avenue MS 2806
Jacksonville, FL 32204-2730

JARED W. PERDUE, P.E.
SECRETARY

September 2, 2022

Andrew Persons, AICP, LEED GA
Director
City of Gainesville Department of Sustainable Development
P.O. Box 490, Station 11
Gainesville, Florida 32627

SUBJECT: City of Gainesville Proposed Comprehensive Plan Amendment (22-3ESR)

Dear Mr. Persons,

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, City of Gainesville 22-3ESR.

The City of Gainesville has transmitted a Future Land Use Element (FLUE) text amendment that proposes to remove the Single-Family (SF) Future Land Use Classification from the City of Gainesville Comprehensive Plan and changing all property currently designated SF to Residential Low-Density (RL). The SF designation allows for an average density of up to 8 dwelling units per acre whereas the RL designation allows for an average density of up to 15 dwelling units per acre. This change affects $\pm 8,430$ acres within the City of Gainesville, currently zoned Residential Single Family 1 to 4.

Based on FDOT's analysis, the proposed land use amendment could add up to 274,500 daily trips to the transportation network. The affected parcels are also spread throughout the City of Gainesville, potentially impacting every State Highway System (SHS) road segment. Therefore, it is expected that SHS could be significantly and adversely impacted by the proposed Comprehensive Plan Amendment.

To comprehensively assess the transportation impacts of the amendment, FDOT recommends that the Gainesville MPO/Alachua County Regional Transportation Model be updated to factor in the higher densities associated with the Comprehensive Plan Amendment, and to model the impacts to the network. The subsequent model run should identify the segments of the State Highway System that will be adversely impacted by this proposal, leading to the development of a mitigation plan.

If you have any questions, please do not hesitate to contact me by email: brian.austin@dot.state.fl.us or call: (904) 360-5664.

Sincerely,

A handwritten signature in blue ink that reads "Brian Austin".

Brian Austin
Transportation Planner
FDOT District Two

cc: Ben Naselius, FDOT Central Office, Office of Policy Planning
Ray Eubanks, DEO

From: [Chazulle, Elizabeth A](#)
To: [Swanigan, Alana C](#)
Subject: Fwd: [EXTERNAL] Gainesville 22-03ESR Proposed
Date: Tuesday, September 13, 2022 9:52:40 AM
Attachments: [image001.png](#)

Get [Outlook for iOS](#)

From: Plan_Review <Plan.Review@dep.state.fl.us>
Sent: Friday, September 9, 2022 4:54:24 PM
To: Persons, Andrew W. <personsAW@cityofgainesville.org>; Chazulle, Elizabeth A <chazulleea@cityofgainesville.org>; dcpexternalagencycomments@deo.myflorida.com <dcpexternalagencycomments@deo.myflorida.com>
Cc: Plan_Review <Plan.Review@dep.state.fl.us>; Fitzgibbons, Steve <sfitzgib@sjrwmd.com>
Subject: [EXTERNAL] Gainesville 22-03ESR Proposed

To: Andrew Persons, AICP, LEED GA, Director

Re: Gainesville 22-03ESR – 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. If your submittal is too large to send via email or if you need other assistance, contact Lindsay Weaver at (850) 717-9037.





From: [Chazulle, Elizabeth A](#)
To: [Swanigan, Alana C](#)
Subject: Fwd: [EXTERNAL] City of Gainesville proposed comprehensive plan amendment 22-03ESR
Date: Tuesday, September 13, 2022 9:53:35 AM
Attachments: [image001.png](#)

Get [Outlook for iOS](#)

From: Steve Fitzgibbons <SFitzgibbons@sjrwmd.com>
Sent: Thursday, September 8, 2022 4:16:33 PM
To: Persons, Andrew W. <personsaw@cityofgainesville.org>; Chazulle, Elizabeth A <chazulleea@cityofgainesville.org>
Cc: DCPexternalagencycomments@deo.myflorida.com <dcpexternalagencycomments@deo.myflorida.com>; Weaver, Lindsay <Lindsay.Weaver@FloridaDEP.gov>; Ben Glass, Community Affairs Manager <Ben.Glass@srwmd.org>
Subject: [EXTERNAL] City of Gainesville proposed comprehensive plan amendment 22-03ESR

Dear Mr. Persons and Ms. Chazulle,

St. Johns River Water Management District (District) staff have reviewed City of Gainesville proposed comprehensive plan amendment 22-03ESR 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.

Please note that all proposed and adopted comprehensive plan amendments can be submitted to the District by email at sfitzgibbons@sjrwmd.com.

Sincerely,
Steve Fitzgibbons

Steven Fitzgibbons, AICP
Intergovernmental Planner
Division of Strategic Planning and Initiatives
St. Johns River Water Management District
7775 Baymeadows Way, Suite 102
Jacksonville, FL 32256
Office (386) 312-2369
Website: www.sjrwmd.com
Connect with us: [Newsletter](#), [Facebook](#), [Twitter](#), [Instagram](#), [YouTube](#), [Pinterest](#)



www.sjrwmd.com/ePermit

We value your opinion. Please take a few minutes to share your comments on the service you received from the District by clicking this [link](#)

Notices

- Emails to and from the St. Johns River Water Management District are archived and, unless exempt or confidential by law, are subject to being made available to the public upon request. Users should not have an expectation of confidentiality or privacy.
- 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/>

From: [Chazulle, Elizabeth A](#)
To: [Swanigan, Alana C](#)
Subject: FW: [EXTERNAL] Gainesville 22-03ESR
Date: Wednesday, September 14, 2022 1:23:18 PM

Thank you,

Elizabeth Chazulle
Senior Executive Assistant
Department of Sustainable Development
City of Gainesville
PO Box 490 Station 11
Gainesville, FL 32627
Office (352) 727-2136
email chazulleea@cityofgainesville.org
www.cityofgainesville.org/planningdepartment

Note: Under Florida law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public-records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing.

From: Persons, Andrew W. <personsaw@cityofgainesville.org>
Sent: Wednesday, September 14, 2022 1:22 PM
To: Chazulle, Elizabeth A <ChazulleEA@cityofgainesville.org>
Subject: FW: [EXTERNAL] Gainesville 22-03ESR

From: Runion, Morgan <Morgan.Runion@fldoe.org>
Sent: Tuesday, August 16, 2022 8:18 PM
To: Persons, Andrew W. <personsaw@cityofgainesville.org>;
DCPexternalagencycomments@deo.myflorida.com
Subject: [EXTERNAL] Gainesville 22-03ESR

Dear Mr. Persons,

The Office of Educational Facilities within the Florida Department of Education has reviewed the Gainesville 22-03ESR proposed comprehensive plan amendment in accordance with sections 163.3180 and 163.3184, Florida Statutes. Based on review of the submitted materials, staff have no comments on the proposed amendment. If you have any questions or need additional information, please contact me.

Sincerely,

Morgan Runion, AICP
Office of Educational Facilities
Florida Department of Education



FLORIDA DEPARTMENT *of* STATE

RON DESANTIS
Governor

CORD BYRD
Secretary of State

Andrew Persons, AICP, LEED GA
City of Gainesville
P.O. Box 490, Station 11
Gainesville, FL 32627

August 23, 2022

Re: DHR Project File No. 2022-2462 / Proposed Comprehensive Plan Amendment - DEO No. 22-03ESR - Gainesville (Ordinance 211357)

Dear Mr. Persons:

According to this agency's responsibilities under Section 163.3184(3)(b) Florida Statutes, we reviewed the above document to determine if proposed plan elements may adversely impact significant historic resources.

It is our understanding that the above proposed amendment covers many different parts of the city and are in different phases of planning. We would like to note that there are many cultural resources recorded in the Florida Master Site File (FMSF) in the above referenced amendment locations. In particular, there are several historic districts and contributing structures located throughout the city, some of which have previously been determined by this office to be eligible for listing in the NRHP. However, other sites within the amendment areas have not yet been evaluated to determine if they are eligible for the NRHP. In addition, there are parts of the city in the amendment areas that have not had cultural resource assessment surveys conducted to determine if unrecorded historical resources are present. These resources could be directly or indirectly affected by future activity. We recommend that any future plans should be sensitive to locating, assessing, and avoiding potential adverse impacts to these resources.

For any questions or assistance concerning our comments, please contact Jennifer Tobias, Historic Sites Specialist, at Jennifer.Tobias@dos.myflorida.com.

Sincerely,

Alissa S. Lotane
Director, Division of Historical Resources and State Historic Preservation Officer

From: [Glass, Ben](#)
To: [Chazulle, Elizabeth A](#)
Cc: [Persons, Andrew W.](#); [Swanigan, Alana C](#)
Subject: [EXTERNAL] RE: DEO22-3ESR
Date: Wednesday, September 14, 2022 1:37:19 PM
Attachments: [image003.png](#)

Apologies,

I responded to the DEO email and neglected to copy. The SRWMD has no comments.

Thanks,

Ben Glass
Legislative and Government Affairs Chief
Suwannee River Water Management District
9225 CR 49, Live Oak, FL 32060
386.362.1001
800.226.1066 (FL Toll Free)
Direct: 386.362.0433
Cell: 386.688.5000
www.mysuwanneeriver.com



Individuals lobbying the District must be registered as lobbyists (Section 112.3261, Florida Statutes).

From: Chazulle, Elizabeth A <ChazulleEA@cityofgainesville.org>
Sent: Wednesday, September 14, 2022 1:34 PM
To: Glass, Ben <Ben.Glass@srwmd.org>
Cc: Persons, Andrew W. <personsaw@cityofgainesville.org>; Swanigan, Alana C <SwaniganAC@cityofgainesville.org>
Subject: DEO22-3ESR

CAUTION: This email originated from outside of the District. Do not click links or open attachments unless you recognize and have verified the sender and know the content is safe.

Hi Ben,

I was wondering if you had a review that you wanted to submit for this item. We haven't received anything in the mail, so if you had one could you send it to me via email?

Thank you,

Elizabeth Chazulle
Senior Executive Assistant
Department of Sustainable Development
City of Gainesville
PO Box 490 Station 11
Gainesville, FL 32627
Office (352) 727-2136
email chazulleea@cityofgainesville.org
www.cityofgainesville.org/planningdepartment

Note: Under Florida law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public-records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing.

All E-mail sent to and from this address may be public records. The Suwannee River Water Management District does not allow use of the District E-mail system and other equipment for non-business related purposes.



Serving Alachua
Bradford • Columbia
Dixie • Gilchrist • Hamilton
Lafayette • Levy • Madison
Suwannee • Taylor • Union Counties

2009 NW 67th Place, Gainesville, FL 32653-1603 • 352.955.2200

August 31, 2022

Mr. Andrew Persons, AICP, Director
Department of Sustainable Development
City of Gainesville
P.O. Box 490, Mail Station 12
Gainesville, FL 32627-0490

RE: Regional Review of City of Gainesville Comprehensive Plan
Draft Amendment City Item No. LD22-000038TCH
DEO No. 22-3ESR

Dear Andrew:

At its regularly scheduled meeting held August 25, 2022, the Council reviewed the above-referenced item. Subsequent to their review, the Council voted to adopt the enclosed report.

If you have any questions concerning this matter, please do not hesitate to contact Lauren Yeatter, AICP, Senior Planner, at 352.955.2200, extension 113.

Sincerely,

Scott R. Koons, AICP
Executive Director

Enclosure

xc: Ray Eubanks, Florida Department of Economic Opportunity

v:\gainesville\2022\gville 22-3csr.txt\gville 22-3csr.txt.ltr.docx

**FLORIDA REGIONAL COUNCILS ASSOCIATION
LOCAL GOVERNMENT COMPREHENSIVE PLAN AMENDMENT REVIEW FORM 01**

Regional Planning Council: North Central Fl
Review Date: 8/25/22
Amendment Type: Draft Amendment

Regional Planning Council Item No.: 124
Local Government: City of Gainesville
Local Government Item No.: LD22-000038 TCH
State Land Planning Agency Item No.: 22-3ESR

Date Mailed to Local Government and State Land Planning Agency: 8/26/22 (estimated)

Pursuant to Section 163.3184, Florida Statutes, Council review of local government comprehensive plan amendments is limited to adverse effects on regional resources and facilities identified in the strategic regional policy plan and extrajurisdictional impacts that would be inconsistent with the comprehensive plan of any affected local government within the region. A written report containing an evaluation of these impacts, pursuant to Section 163.3184, Florida Statutes, is to be provided to the local government and the state land planning agency within 30 calendar days of receipt of the amendment.

DESCRIPTION OF AMENDMENT

City item LD22-000038 TCH amends Policy 4.1.1 of the City’s Comprehensive Future Land Use Element by eliminating the Single Family classification (up to 8 dwelling units per acre) and changing the Future Land Use Plan Map designation of all property currently designated Single Family (up to 8 dwelling units per acre) to Residential Low Density (up to 15 dwelling units per acre) (See attached.)

1. ADVERSE EFFECTS TO SIGNIFICANT REGIONAL RESOURCES AND FACILITIES IDENTIFIED IN THE STRATEGIC REGIONAL POLICY PLAN

City item LD22-000038 TCH is a city-wide amendment. Interstate 75, U.S. Highway 441, State Road 20, State Road 24, State Road 24A, State Road 26, State Road 26A, State Road 120, State Road 121, State Road 222, State Road 226 and State Road 331 located within the city limits are part of the Regional Road Network as identified and mapped in the North Central Florida Strategic Regional Policy Plan. The City Transportation Mobility Element contains objectives and policies which implement one or more practices consistent with Transportation Planning Best Practices contained in the North Central Florida Strategic Regional Policy Plan. Regional Plan Transportation Element Policy 5.1.1 states that within municipalities where local government comprehensive plans contain goals and policies which implement Transportation Planning Best Practices, adverse impacts to the Regional Road Network are adequately mitigated and local government plans and plan amendments are not subject to a Regional Planning Council determination impacts to the Regional Road Network. Therefore, significant adverse transportation impacts to the Regional Road Network are adequately mitigated.

Significant adverse impacts are not anticipated to occur to Natural Resources of Regional Significance, as the City Comprehensive Plan contains adequate policy direction consistent with the regional plan to mitigate adverse impacts to natural resources.

2. EXTRAJURISDICTIONAL IMPACTS INCONSISTENT WITH THE COMPREHENSIVE PLANS OF LOCAL GOVERNMENTS WITHIN THE REGION

The City Comprehensive Plan, as amended, is not anticipated to create significant adverse impacts to adjoining local governments.

Request a copy of the adopted version of the amendment?

Council Action: At its August 25, 2022 meeting, the Council voted to adopt this report.

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Not Applicable	<input type="checkbox"/>		<input type="checkbox"/>



Alachua County Board of County Commissioners

Marihelen Wheeler, *Chair*
Anna Prizzia, *Vice Chair*
Charles S. Chestnut, IV
Ken Cornell
Raemi Eagle-Glenn

Administration
Michele L. Lieberman
County Manager

August 26, 2022

Via email: poel@cityofgainesville.org

The Honorable Lauren Poe, Mayor
City of Gainesville
P.O. Box 490, Station 19
Gainesville, FL 32627-0490

RE: Comments on Proposed Comprehensive Plan Amendment Transmitted for Expedited State Review (DEO Reference Number 22-3 ESR/City Legislative Matter 211357)

Dear Mayor Poe:

Thank you for the opportunity to review and comment on the City's proposed Comprehensive Plan Amendment referenced above through the Expedited State Review process pursuant to Chapter 163.3184, Florida Statutes. The County received the City's letter dated August 6, 2022 with the transmitted amendments on August 12, 2022.

The County appreciates the City's intent behind the proposed amendment to address affordable housing and equity issues within our community, however, the County is concerned about the potential for widespread impacts that could result from this amendment, and that these impacts have not been identified or considered as part of the supporting data and analysis for the amendment.

The proposed Comprehensive Plan amendment would eliminate the Single Family Residential Future Land Use Category from the City's Comprehensive Plan. It would also change the Future Land use designation of all areas within the City currently having the Single Family Residential designation to the Low Density Residential designation.

The Single Family Residential designation that is proposed to be eliminated allows for only single family detached dwellings at a maximum density of 8 units per acre. The Low Density Residential Future Land Use designation, which would replace the Single Family Residential designation, allows for single family residential, zero lot line development, and small scale multi-family development at a maximum density of 15 units per acre. This proposed change would affect several thousand acres of land distributed throughout the City and would allow for potential significant increases in residential density within these areas.

In accordance with Section 163.3184, Florida Statutes, County comments on proposed Comprehensive Plan amendments shall be in the context of the relationship and effect of the proposed plan amendments on the County Plan.

Florida Statutes Section 163.3177(1)(f) provides in part that comprehensive plan amendments shall be based upon relevant and appropriate data and an analysis by the local government. The City has not provided data and analysis on the full extent of potential impacts of the proposed amendment. Specifically, data and analysis has not been provided regarding how the proposed amendment would impact land use compatibility with surrounding existing and future land uses, and particularly for those areas that are within unincorporated Alachua County. Also, no data and analysis has been provided on the need for publicly funded infrastructure, facilities, and services, some of which are owned, operated and maintained by Alachua County within or adjacent to some of the affected areas. In the absence of appropriate data and analysis, the potential impacts of the proposed amendment on Alachua County cannot be determined.

We recommend that the City delay consideration of adoption of this Comprehensive Plan amendment until the full extent of its potential impacts have been identified and evaluated through appropriate data and analysis. The proposed amendment should then react appropriately to the data and analysis in accordance with Section 163.3177(1)(f), Florida Statutes.

If you have any questions or would like to discuss this matter, please contact me.

Sincerely,



Marihelen Wheeler, Chair
Alachua County Commission
Chr22.040

MW/JH/bc

cc: Board of County Commissioners
Michele Lieberman, County Manager
Sylvia Torres, County Attorney
Mari K. Daniels, Acting Assistant County Manager
D. Ray Eubanks, Florida Department of Economic Opportunity
Scott Koons, North Central Florida Regional Planning Council Executive Director
City of Gainesville Mayor and Commissioners
Cynthia Curry, City of Gainesville Interim City Manager
Andrew Persons, City of Gainesville Sustainable Development Department Director