

# City of Jacksonville, Florida

*Lenny Curry, Mayor*

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February 18, 2021

The Honorable Tommy Hazouri, President  
The Honorable Michael Boylan, LUZ Chair  
And Members of the City Council  
117 West Duval Street  
Jacksonville, Florida 32202

**RE: Planning Commission Advisory Report / Ordinance No. 2020-606/Application No. L-5460-20C**

Dear Honorable Council President Hazouri, Honorable Council Member and LUZ Chairman Boylan and Honorable Members of the City Council:

Pursuant to the provisions of Section 650.405 *Planning Commission Advisory Recommendation and Public Hearing*, the Planning Commission **APPROVED WITH RECOMMENDATIONS** Ordinance 2020-606 on February 18, 2021.

P&DD Recommendation

DENY

PC Issues:

The Commission recommended approval of the amendment with the following two recommendations:

- remove the western most portion of the application site (designated as a retention pond on the PUD site plan) from the land use and zoning applications, and
- revise the list of permitted uses in the companion PUD written description to remove those uses that are inconsistent with the proposed office development shown on the PUD site plan.

**PC Vote:**

**5-0 APPROVE WITH RECOMMENDATIONS TO REVISE THE LEGAL DESCRIPTION AND REMOVE NON-OFFICE USES FROM THE COMPANION PUD WRITTEN DESCRIPTION**

Joshua Garrison, Chair

Aye

Dawn Motes, Vice-Chair

Absent

David Hacker, Secretary

Absent

Marshall Adkison

Aye

Janiel Blanchard

Aye

Ian Brown

Aye

Alexander Moldovan	Aye
Jason Porter	Absent

If you have any questions or concerns, please do not hesitate to contact me at your convenience.

Sincerely,

*Kristen D. Reed*

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Report of the Jacksonville Planning and Development Department

Small-Scale Future Land Use Map Amendment – October 30, 2020

**Ordinance/Application No.:** 2020-606/ L-5460-20C

**Property Location:** 404 St. Johns Bluff Road, 0 St. Johns Bluff Road and 10657 Airport Terrace Drive

**Real Estate Number(s):** 163215-0000, 163411-0010, 163411-0020

**Property Acreage:** 2.3 Acres

**Planning District:** District 2

**City Council District:** District 2

**Applicant:** Patrick Krechowski

**Current Land Use:** 0.45 of an acre Low Density Residential (LDR) and 1.85 acres Residential-Professional-Institutional (RPI)

**Proposed Land Use:** Community General Commercial (CGC)

**Development Area:** Suburban Development Area

**Current Zoning:** Residential Low Density-60 (RLD-60) and Commercial, Residential and Office (CRO)

**Proposed Zoning:** Planned Unit Development (PUD)

**RECOMMENDATION:** **DENY**

**APPLICANT'S JUSTIFICATION FOR THE LAND USE MAP AMENDMENT**

Change land use from vacant/mobile home to PUD for outdoor vehicle storage.

**BACKGROUND**

The 2.3-acre subject site is located on the west side of St. Johns Bluff Road, a collector road, and is between Craig Drive and Airport Terrace Drive. The site consists of three (3) parcels, one (1) which has a split land use with LDR on the western most 0.45 of an acre and RPI on the eastern portion, which fronts St. Johns Bluff Road.

The applicant seeks an amendment to the Future Land Use Map series (FLUMs) of the Future Land Use Element (FLUE) of the 2030 Comprehensive Plan from RPI and LDR to

CGC in order to develop the site with an outdoor vehicle storage lot. A companion rezoning application is pending concurrently with the land use application via Ordinance 2020-607, which seeks to change the zoning district from RLD-60 and CRO to PUD. Currently the site has an older home and garage structure on the site. A fitness center, a church and undeveloped commercial uses are located to the south of the subject site. A row of six (6) single-family homes abuts the north property line. On the east side of St. Johns Bluff Road is Craig Executive Airport and almost directly across from the amendment site is a vehicle storage area on the airport property in the PBF land use category.

The adjacent land use categories, zoning districts and property uses are as follows:

North: Land Use: RPI and LDR  
Zoning: CRO and RLD-60  
Property Use: Single family homes

South: Land Use: RPI and LDR  
Zoning: CRO and RLD-60  
Property Use: Undeveloped commercial lots and single-family homes

East: Land Use: Public Buildings and Facilities (PBF)  
Zoning: Public Buildings and Facilities -3 (PBF-3)  
Property Use: Outdoor storage at Craig Executive Airport

West: Land Use: LDR  
Zoning: RLD-60  
Property Use: Single family homes

## **IMPACT ASSESSMENT**

Potential impacts of a proposed land use map amendment have been analyzed by comparing the Development Impact Standards for the subject site's existing vs. proposed land use categories unless maximum density/intensity is noted on the Annotated FLUM or is in a site specific policy. Development Impact Standards are detailed in FLUE Policy 1.2.16, *Development Standards for Impact Assessment*. These standards produce development potentials as shown in this section.

Where there is not an associated site specific policy or note on the Annotated FLUM, the impact assessment incorporates supplemental information for non-residential land use categories that permit residential uses in order to assess the potential impacts. Supplemental information related to these impacts are depicted as scenario 2 in the Impact Assessment Baseline Review Table and, as relevant, in the analysis following the table.

## Land Use Amendment Impact Assessment

<b>Development Analysis</b>		
Development Boundary	Suburban	
Roadway Frontage Classification / State Road	Collector	
Plans and/or Studies	St Johns Corridor Study, Arlington-Beaches Vision Plan	
Site Utilization	Current: Single Family	Proposed: Commercial
Land Use / Zoning	Current: RPI and LDR/CRO and RLD-60	Proposed: CGC/PUD
Development Standards for Impact Assessment	Current: Scenario 1: 5 DU per acre and 0.5 FAR Scenario 2: 90% residential at 15 DU/Acre and 10% non-residential at .5 FAR.	Proposed: Scenario 1: 0.35 FAR Scenario 2: 80% 15 DU per acre and 20% 0.35 FAR
Development Potential	Current: Scenario 1: 2 DU and 40,293 sq. ft. Scenario 2: 24 DU and 4,029 sq. ft.	Proposed: Scenario 1: 35,065.8 sq. Scenario 2: 27 DU and 7,013.16 sq. ft.
Net Increase or Decrease in Maximum Density	Scenario 1: Decrease of 2 DU Scenario 2: Increase of 3 DU	
Net Increase or Decrease in Potential Floor Area	Scenario 1: Decrease of 5,227.2 sq. ft. Scenario 2: Increase of 2,984.16 sq. ft.	
Population Potential	Current: Scenario 1: 7 people Scenario 2: 69 people	Proposed: Scenario 1: N/A Scenario 2: 63 people
<b>Special Designation Areas</b>		
Aquatic Preserve	No	
Septic Tank Failure Area	No	
Airport Environment Zone	Yes Jacksonville Executive Airport 50 ft. height on eastside of property and 150 ft. on the west side. SE corner in noise contour zone 60DNL/ Airport Notice Zone	
Industrial Preservation Area	No	
Cultural Resources	No	
Archaeological Sensitivity	High	
Historic District	No	
Coastal High Hazard/Adaptation Action Area	No	

<b>Development Analysis</b>	
Groundwater Aquifer Recharge Area	Yes 0-4 inches
Wellhead Protection Zone	No
Boat Facility Siting Zone	No
Brownfield	No
<b>Public Facilities</b>	
Potential Roadway Impact	Scenario1 : 1,111 net new daily trips Scenario 2: 268 net new daily trips
Potential Public School Impact	Scenario 1: N/A Scenario 2: 7 students
Water Provider	JEA
Potential Water Impact	Scenario 1: Decrease 1872 gpd Scenario 2: Increase of 11,355 gpd
Sewer Provider	JEA
Potential Sewer Impact	Scenario 1: Decrease 1404 gpd Scenario 2: Increase of 8,516 gpd
Potential Solid Waste Impact	Scenario 1: Increase of 81.9 tons per year Scenario 2: Decrease 16.1 tons per year
Drainage Basin/Sub-basin	Downstream Trout River/Gin House Creek
Recreation and Parks	Jacksonville Arboretum
Mass Transit Access	Yes, on Atlantic Blvd
<b>Natural Features</b>	
Elevations	35 ft.
Land Cover	1200 Residential medium density
Soils	71 Urban Land Leon Boulogne complex
Flood Zones	No
Wetlands	No
Wildlife (applicable to sites greater than 50 acres)	N/A

### Utility Capacity

The calculations to determine the water and sewer flows contained in this report and/or this spreadsheet have been by the City of Jacksonville Planning and Development Department and have been adopted by JEA solely for the purpose of preparing this report and/or this spreadsheet. The method of calculating water and sewer flows in order to properly size infrastructure established shall continue to be based on JEA's Water, Sewer and Reuse for New Development Projects document (latest edition).

The land use application indicates that JEA will provide water and sewer for the site. JEA provided a memo, dated September 23, 2020, stating that water and sewer mains are available for connection near the subject site, consistent with FLUE Policy 1.2.9.

## Transportation

The Planning and Development Department completed a transportation analysis, which is on file with the Planning and Development Department, and determined that the proposed amendment from LDR and RPI to CGC has the development potential under scenario 1 as 100 percent non-residential and under scenario 2 as 80 percent residential, and 20 percent non-residential. If the land use is amended to CGC, development could result in 1,111 new net vehicular trips under scenario 1 and an increase of 268 new net vehicular trips under scenario 2. This analysis is based upon the comparison of what potentially could be built on that site versus the maximum development potential. Trips generated by the new development will be processed through the Concurrency and Mobility Management System Office.

### Transportation Element

**Policy 1.2.1** The City shall use the Institute of Transportation Engineers *Trip Generation Manual*, latest edition, to determine the number of trips to be produced or attracted to a particular land use when assessing a traffic impact.

### Capital Improvements Element

**Policy 1.6.1** Upon adoption of the Mobility Plan implementing ordinance, the City shall cease transportation concurrency and use a quantitative formula for purposes of assessing a landowner's mobility fee for transportation impacts generated from a proposed development, where the landowner's mobility fee shall equal the cost per vehicle miles traveled (A); multiplied by the average vehicle miles traveled per Development Area (B); multiplied by the daily trips (C); subtracted by any trip reduction adjustments assessed to the development.

**Objective 2.4** of the Transportation Element (TE) of the 2030 Comprehensive Plan requires that the City shall coordinate the mobility circulation system with the future land uses shown on the Future Land Use Map series in order to ensure that roads, road improvements and other mobility alternative improvements are provided as necessary to support development in an economically efficient and environmentally sound manner.

**Policy 2.4.2** of the TE of the 2030 Comprehensive Plan requires that the City shall amend the adopted Comprehensive Plan to incorporate the data and analysis generated by a periodic regional transportation model and study and facilitate the implementation of the study recommendations.

These two Comprehensive Plan policies ensure that the transportation impact related to land use amendments are captured in the Long Range Transportation Plan (LRTP) that is conducted every 5 years. This analysis includes the cumulative effect of all land use amendments that were approved within this time period. This plan identifies the future transportation needs and is used to create cost feasible roadway needs that can be funded by the City's Mobility Strategy Plan.

Mobility needs vary throughout the city and in order to quantify these needs, the city was divided into 10 Mobility Zones. The Mobility Strategy Plan identifies specific transportation strategies and improvements to address traffic congestion and mobility needs for each mode of transportation. The project site is located in Mobility Zone 8.

Subject site is accessible via St. Johns Bluff Road and Airport Terrace Drive. St. Johns Bluff Road is a collector facility and the proposed development will have external traffic impacts on the roadway network. The Transportation Planning Division recommends ongoing coordinating efforts with COJ Traffic Engineer Division to ensure that a traffic operational analysis is provided to address the specific external impacts as a result of this land use amendment.

### **School Capacity**

The Planning and Development Department determined that the proposed amendment from LDR and RPI to CGC has the development potential under scenario 1 as 100% non-residential and under scenario 2 as 80% residential and 20 percent non-residential. Under scenario 2, the proposed amendment could result in development of 27 multi-family dwelling units.

The proposed development was analyzed in accordance with the adopted level of service standards (LOS) for school capacity as established in the Interlocal Agreement (ILA) and the Public Schools and Facilities Element. The ILA was entered into in coordination with the Duval County Public School System (DCPS) and the other municipalities within Duval County.

School concurrency LOS is the methodology used to analyze and to determine whether there is adequate school capacity for each school type (elementary, middle, and high school) to accommodate a proposed development. The LOS (105% of permanent capacity) is based on Concurrency Service Areas (CSAs), not the closest school in the area for elementary, middle and high schools, as well as on other standards set forth in the City of Jacksonville School Concurrency Ordinance.

In evaluating the proposed residential development for school concurrency, the following results were documented:

- Elementary School
  - Concurrency Service Area (CSA) 5
  - 2019/2020 enrollment: 8,816
  - Current utilization: 89%
  - New student development from amendment: 4
  - 5-year utilization: 94%
  - Available seats in CSA 5: 181
  - Available seats in adjacent CSA(s): 3 and 4 is 850
  
- Middle School
  - CSA 5
  - 2019/2020 enrollment: 2,529



- Current utilization: 90%
- New student development from amendment: 1
- 5-year utilization: 88%
- Available seats in CSA 5: 22
- Available seats in adjacent CSA(s): 3 and 4 is 234
- High School
  - CSA 5
  - 2019/2020 enrollment: 7,771
  - Current utilization: 100%
  - New student development from amendment: 2
  - 5-year utilization: 98%
  - Available seats in CSA 5: 64
  - Available seats in adjacent CSA(s): 3 and 4 is 95

The analysis of the proposed residential development reveals no deficiency for school capacity within the CSA and adjacent CSAs. Potential school capacity impacts will be addressed through the Concurrency and Mobility Management System Office.

**Public School Facilities Element**

**Policy 2.3.2** The City will coordinate with DCPS to establish plan review procedures to manage the timing of Future Land Use Map amendments and other land use decisions so that these decisions coordinate with adequate school capacity.

**Policy 2.3.3** The City will take into consideration the DCPS comments and findings on the availability of adequate school capacity in the evaluation of comprehensive plan amendments, and other land use decisions as provided in Section 163.3177(6)(a), F.S. and development of regional impacts as provided in 1380.06, F.S

**Supplemental School Information**

The following additional information regarding the capacity of the assigned neighborhood schools is provided by the Duval County School Board. This information is not based on criteria utilized by the City of Jacksonville School Concurrency Ordinance. Note that the percentage occupied may not appear correct due to ESE space requirements.

- Lone Star Elementary School
  - CSA 5
  - Amendment student generation: 4
  - School Capacity including permanent spaces and portables: 713
  - Current enrollment 20 day county for 2019/2020: 460
  - Percent Occupied: 65%
  - 4-year projection: 65%
- Landmark Middle School

- CSA 5
  - Amendment student generation: 1
  - School Capacity including permanent spaces and portables: 1,665
  - Current enrollment 20 day county for 2019/2020: 1,335
  - Percent Occupied: 80%
  - 4-year projection: 75%
- Sandalwood High School
    - CSA 5
    - Amendment student generation: 2
    - School Capacity including permanent spaces and portables: 2,813
    - Current enrollment 20 day county for 2019/2020: 2,879
    - Percent Occupied: 102%
    - 4-year projection: 109%

**Airport Environment Zone**

The site is located within the 50 and 150 foot Height and Hazard Zone for the Jacksonville Executive Airport. Zoning will limit development to a maximum height of less than 50 or 150 ft, unless approved by the Jacksonville Aviation Authority or the Federal Aviation Administration. Uses located within the Height and Hazard Zone must not create or increase the potential for such hazards as electronic interference, light glare, bird strike hazards or other potential hazards to safe navigation of aircraft as required by Section 656.1005.1(d).

**Future Land Use Element**

Objective 2.5 Support and strengthen the role of Jacksonville Aviation Authority (JAA) and the United States Military in the local community, and recognize the unique requirements of the City's other airports (civilian and military) by requiring that all adjacent development be compatible with aviation-related activities.

A very small portion of the amendment site section of the site is within the 60-64.99 Day-Night Sound Level (DNL) noise contour range. As such this area is within the Civilian Influence Zone for Jacksonville Executive Airport. In accordance with Section 656.1010, the plat for a subdivision shall indicate which lots are located within a Civilian Influence Zone. No person shall sell, transfer, or lease land within a Civilian Influence Zone, unless the prospective owner, transferee or lessee has been given a disclosure of airport proximity in writing, at the time of contract of sale, transfer, or lease.

**Future Land Use Element**

Objective 2.5 Support and strengthen the role of Jacksonville Aviation Authority (JAA) and the United States Military in the local community, and recognize the unique requirements of the City's other airports (civilian and military) by requiring that all adjacent development be compatible with aviation-related activities.

Policy 2.5.5C Within the 60DNL or higher area as depicted on Map L-22, entertainment assembly uses are only permitted in PUD developments or pursuant to preliminary site development reviews in accordance with Section 656.1003 that were approved prior to March 27, 2007 or those uses meeting the nonconforming uses definition in Section 656.1008 of the City of Jacksonville Zoning Code. All other uses are allowed subject to disclosure requirements.

Policy 2.5.6 To ensure safety and education of citizens occupying properties that are located near military and civilian airports, the City requires disclosure of airport proximity to prospective owners or lessees in the Military and Civilian Influence Zones depicted on Map L-22.

### **Aquifer Recharge**

The site is located within an area identified as being in the 0 to 4 inch per year aquifer recharge area. This range is below the threshold of 12 inches or more per year which would constitute a prime recharge area as defined in the Infrastructure Element – Aquifer Recharge Sub-Element (IE-AR). Prime aquifer recharge areas are the primary focus of groundwater resource protections. However, development resulting from the proposed land use amendment will be reviewed during the site plan review and permitting process for compliance with the land development regulations that have been established to protect groundwater resources. Such regulations address issues such as drainage systems, septic systems, and landscape/irrigation regulations.

### **Infrastructure Element**

Policy 1.2.8 Within two years of establishment by the SJRWMD and the Water Resources Management Plan of prime recharge areas for the Floridian Aquifer, the Planning and Development Department shall prepare maps of such designated areas showing the special zoning and land use consideration the City has established for such areas as designated by the latest update of the Floridian Aquifer Recharge GIS grid coverage.

### **Archaeological Sensitivity**

According to the Duval County Archaeological Predictive Model, the subject property is located within an area of high sensitivity for the presence of archaeological resources. Projects that move forward through the Site Review process may be required to perform a Professional Archaeological Reconnaissance Survey on the portion of the site that is in a high sensitivity area. If archaeological resources are found during future development/redevelopment of the site, Section 654.122 of the Code of Subdivision Regulations should be followed.

### **Historic Preservation Element**

Policy 1.2.6 The Planning and Development Department shall maintain and update for planning and permitting purposes, a U.S.G.S. series of topographic maps upon which recorded archaeological sites are shown.

## **PROCEDURAL COMPLIANCE**

Upon site inspection by the Planning and Development Department on October 14, 2020, the required notices of public hearing signs were posted. Thirty-six (36) notices were mailed out to adjoining property owners informing them of the proposed land use change and pertinent public hearing and meeting dates.

The Citizen Information Meeting was held on October 19, 2020 for the adoption of the small-scale land use amendment. Other than the applicant, no members of the public were present.

## **CONSISTENCY EVALUATION**

### **Consistency with 2030 Comprehensive Plan Goals, Objectives and Policies**

#### **Future Land Use Element (FLUE)**

##### *Development Area*

*Suburban Area (SA):* The SA is the third tier Development Area and generally corresponds with the urbanizing portions of the City in areas that have usually been developed after consolidation. Development should generally continue at low densities with medium density development at major corridor intersections and transit stations. Development at these locations should promote a compact and interconnected land development form and is therefore encouraged to employ urban development characteristics as further described in each land use plan category.

- Policy 1.1.5            The amount of land designated for future development should provide for a balance of uses that:
- A. Fosters vibrant, viable communities and economic development opportunities;
  - B. Addresses outdated development patterns;
  - C. Provides for sufficient land for future uses that allow for the operation of real estate markets to provide adequate choices for permanent and seasonal residents and businesses and is not limited solely by the projected population.
- Policy 1.1.11           Encourage that new non-residential projects be developed in designated nodal and corridor development areas as provided in the Plan Category Descriptions of the Operative Provisions, in appropriate commercial infill locations, or as a Transit Oriented Development (TOD), as described in this element.
- Policy 1.1.21           Future amendments to the Future Land Use Map series (FLUMs) shall include consideration of their potential to further the goal of meeting or exceeding the amount of land required to accommodate anticipated growth and the projected population of the area and to allow for the operation of real estate markets to provide adequate choices for permanent and seasonal residents and business consistent with FLUE

Policy 1.1.5. The projected growth needs and population projections must be based on relevant and appropriate data which is collected pursuant to a professionally acceptable methodology. In considering the growth needs and the allocation of land, the City shall also evaluate land use need based on the characteristics and land development pattern of localized areas. Land use need identifiers include but may not be limited to, proximity to compatible uses, development scale, site limitations, and the likelihood of furthering growth management and mobility goals.

Policy 1.2.9 Require new development and redevelopment in the Central Business District, Urban Priority Area, Urban Area, and Suburban Area to be served by centralized wastewater collection and potable water distribution systems when centralized service is available to the site. New septic tanks in this area maybe permitted only as interim facilities pursuant to the requirements of the Sanitary Sewer Sub-Element.

Policy 3.1.3 Protect neighborhoods from potential negative impacts by providing a gradation of uses and scale transition. The Development Regulations shall be amended to provide for an administrative process to review and grant, when appropriate, relief from the scale transition requirements.

Policy 3.2.3 The City shall prohibit the expansion or replacement of commercial uses that do not meet applicable locational criteria of the 2030 Comprehensive Plan and have an adverse impact on adjoining or nearby uses. Consider office and high density residential development as a viable alternative in land use reviews.

Policy 3.2.4 The City shall permit expansion of commercial uses adjacent to residential areas only if such expansion maintains the existing residential character, does not encourage through traffic into adjacent residential neighborhoods, and meets design criteria set forth in the Land Development Regulations.

Policy 4.1.8B The City shall evaluate all proposed amendments to the Comprehensive Plan as to their compliance with the area's vision plan and any existing neighborhood plans and studies. Priority shall be given to those amendments with the greatest potential to further the goals and objectives of the vision plans and neighborhood plans and studies.

Low Density Residential (LDR) is a category intended to provide for low density residential development at up to 7 dwelling units per acre. Generally, single-family detached housing should be the predominant development typology in this category Mixed use developments utilizing the Traditional Neighborhood Development (TND) concept, which

is predominantly residential but includes a broad mixture of secondary recreational, commercial, public facilities and services may also be permitted.

RPI in the Suburban Area is intended to provide low to medium density development at up to 20 dwelling units per acre. Development which includes medium density residential and professional office uses is preferred. Plan amendment requests for new RPI designations are preferred in locations which are supplied with full urban services and in locations which serve as a transition between commercial and residential land uses.

CGC in the Suburban Area is intended to provide development in a nodal development pattern. Plan amendment requests for new CGC designations are preferred in locations which are supplied with full urban services; abut a roadway classified as an arterial or higher on the Functional Highway Classification Map; and which located in areas with an existing mix of non-residential uses. Nodal sites with two or more boundaries on a transportation right-of-way shall be considered preferred locations for these uses.

The land use amendment site is located across from Craig Executive Airport to the east, which extends from Atlantic Boulevard north to Monument Road and has a land use category of Public Building and Facilities (PBF). The western side of St. Johns Bluff Road is predominately RPI land uses with Neighborhood Commercial (NC) and CGC existing near the intersections of Atlantic Boulevard, Monument Road, and Lone Star Road. Along the west side of St. Johns Bluff Road the commercial uses are predominately office and warehouse uses with several vacant commercial lots, which transition to single-family residential uses to the west.

Consistent with FLUE Policy 1.2.9, the subject site is served by city water and sewer services. According to a JEA letter dated September 23, 2020 there is a 12-inch water main and 4-inch sewer main, approximately 775 feet south of the property, in the St. Johns Bluff Road right-of-way.

The more intensive commercial uses allowed in CGC are not likely to be compatible with the low-density residential area abutting the site. According to the 2030 Comprehensive Plan, more intense commercial uses such as those found in the Community/General Commercial (CGC) and Neighborhood Commercial (NC) land use category are preferred to develop in "nodal" patterns at the intersections of roadways. Such uses generate volumes of traffic that can best be handled at intersections, rather than at mid-block sites. CGC does encourage corridor development but a more detailed corridor study identified nodal development as appropriate at this location. The St. Johns Bluff Corridor Study echoes the Comprehensive Plan by encouraging more intense commercial uses like those allowed in CGC and NC to be developed in nodal patterns at the intersection of roadways. CGC is not compatible with the low-density residential and existing office uses in the area. The corridor study states requests that increase the intensity of use should not be promoted. Therefore, the amendment to CGC is inconsistent with FLUE Policies 1.1.5, 1.1.11, 3.2.3, and 4.1.8B.

The change of the LDR portion of the split lot to CGC is an intrusion into the neighborhood. The expansion of CGC into an established LDR area fails to result in a compatible land use pattern that provides for a graduation of uses and transition between densities and intensities of land uses. A more appropriate transition is achieved with the existing RPI land use category. The primary and secondary uses allowed under either BP or RPI are appropriate transitions between the corridor and the residential uses to the west of the corridor. Commercial strip development and many industrial uses are not compatible with the low density residential and commercial office uses already existing. The proposed change to CGC intensifies the type of commercial usage allowed and may have an adverse impact on adjoining residential uses to the north and west. Therefore, the proposed amendment is inconsistent with FLUE Policies 1.1.21, 3.1.3, 3.2.4 and 4.1.8B.

### **Greater Arlington/ Beaches Vision Plan**

The application site lies within the boundary of the Greater Arlington/Beaches Vision Plan. The plan does not identify specific recommendations for the subject site; however, the proposed land use amendment to CGC is inconsistent with Guiding Principle Two, Objective 2.1.3 of the Plan promoting neighborhood stability. The proposed infill development does not cultivate neighborhood stability because it does not protect the abutting residential area from incompatible uses. The Plan states that the paramount goal is the enhancement of neighborhoods. Existing neighborhoods must be protected and the community needs to have confidence that new growth will enhance their quality of life and not detract from it. Therefore, the amendment is inconsistent with the Vision Plan.

### **St. Johns Bluff Corridor Study**

The segment of the corridor north of Atlantic Boulevard is generally less intensely developed than the southern segment. In order to preserve the more mixed-use character of this segment, the Study states CGC uses should not be expanded beyond the existing parcels in the corridor. An additional measure that will serve to preserve the character of the corridor is limiting commercial/retail uses to the RPI and BP land use categories. Commercial uses in the RPI land use category should be restricted to those uses allowed in the CRO or CN zoning districts. Those retail uses that include such features as drive-throughs, gas pumps or car washes should be limited to those locations that are at the intersection of two roadways and not mid-block. The few intersections along the corridor that could be considered "nodes" as necessary for retail/commercial development are already developed as, or designated, for commercial development. NC and CGC land uses should be restricted to the nodes where such uses already exist. Therefore, the amendment is inconsistent with the Corridor Study.

### **Strategic Regional Policy Plan**

The proposed amendment is inconsistent with the following Objective and Policy of the Strategic Regional Policy Plan:

Objective: Improve Quality of Life and Provide Quality Places in Northeast Florida

Policy 3: Local governments are encouraged to offer incentives or make development easier in areas appropriate for infill and redevelopment.

Due to the property's location, the site is considered infill development along St. Johns Bluff corridor. The development pattern of St. Johns Bluff Road contains less intense commercial uses. The land use amendment change to CGC makes the site an inappropriate location for the more intense commercial uses allowed in this land use category. Therefore, the proposed amendment is inconsistent with Policy 3 of the Strategic Regional Policy Plan.



# LOCATION AND CURRENT LAND USE MAP



# FIELD UTILIZATION MAP

