

# City of Jacksonville, Florida

*Lenny Curry, Mayor*

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September 9, 2021

The Honorable Samuel Newby, President  
The Honorable Rory Diamond, LUZ Chair  
And Members of the City Council  
117 West Duval Street  
Jacksonville, Florida 32202

**RE: Planning Commission Advisory Report / Ordinance No. 2021-528/Application No. L-5538-21C**

Dear Honorable Council President Newby, Honorable Council Member and LUZ Chairman Diamond 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** Ordinance 2021-528 on September 9, 2021.

P&DD Recommendation	APPROVE
PC Issues:	None
<b>PC Vote:</b>	<b>5-0 APPROVE</b>

Joshua Garrison, Chair	Absent
Dawn Motes, Vice-Chair	Absent
David Hacker, Secretary	Absent
Marshall Adkison	Aye
Daniel Blanchard	Aye
Ian Brown	Aye
Alexander Moldovan	Aye
Jason Porter	Aye

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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 – September 3, 2021**

**Ordinance/Application No.:** 2021-528 / L-5538-21C  
**Property Location:** 5715 Old Kings Road  
**Real Estate Number(s):** 083552 0030  
**Development Area:** Suburban Development Area  
**Property Acreage:** 16.45 acres  
**Planning District:** District 5, Northwest  
**City Council District:** District 10  
**Applicant:** Paul Harden, Esquire  
**Current Land Use:** Light Industrial (LI)  
**Proposed Land Use:** Medium Density Residential (MDR)  
**Current Zoning:** Industrial Light (IL)  
**Proposed Zoning:** Residential Low Density-40 (RLD-40)

***RECOMMENDATION: APPROVE***

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

To develop as residential property.

**BACKGROUND**

The undeveloped 16.45 acre site is located on the north side of Old Kings Road, a minor arterial road, between Pickettville Road and Edgewood Avenue North. It is also at the north end terminus of Lane Avenue North, a collector road, at the intersection with Old Kings Road. The applicant is proposing an amendment to the Future Land Use Map series (FLUMs) from Light Industrial (LI) to Medium Density Residential (MDR) to develop the site for residential uses, with a companion rezoning application to change zoning from Industrial Light (IL) to Residential Low Density-40 (RLD-40). The companion rezoning, Ordinance 2021-529, is pending concurrently with this application.

The area surrounding the subject site is made up of a mix of uses, though most of the area contains single family homes. There are single-family residential areas south, east

and west of the property. There is a corner store west of the property at the intersection of Old Kings Road and Pickettville Road. The area north of the property is vacant and undeveloped. Given the residential uses to south, east and west of the subject site, the proposed amendment would be consistent with existing neighborhood uses.

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

North: Land Use: Heavy Industrial (HI)  
 Zoning: Industrial Business Park (IBP)  
 Property Use: Undeveloped land

South: Land Use: Low Density Residential (LDR)  
 Zoning: Rural Residential-Acre (RR-Acre), Commercial Neighborhood (CN), Residential Low Density-120 (RLD-120), and Residential Low Density-60 (RLD-60)  
 Property Use: Single Family Homes

East: Land Use: HI and LDR  
 Zoning: IBP and RR-Acre  
 Property Use: Single Family home and undeveloped land

West: Land Use: HI and LDR  
 Zoning: IBP and RR-Acre  
 Property Use: Single Family homes, a corner store, and undeveloped land

**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.

**Land Use Amendment Impact Assessment - Application Number L-5538-21C**

<b>Development Analysis 16.45 Acres – 716,562 sq. ft.</b>		
Development Boundary	Suburban Area	
Roadway Frontage Classification / State Road	Old Kings Road – Minor Arterial	
Plans and/or Studies	Northwest Vision Plan	
Site Utilization	Current: Vacant Timber	Proposed: To develop as residential property

<b>Development Analysis 16.45 Acres – 716,562 sq. ft.</b>		
Land Use / Zoning	Current: LI / IL	Proposed: MDR / RLD-40
Development Standards for Impact Assessment	Current: 0.40 FAR	Proposed: 15 DU / acre
Development Potential	Current: 286,624.8 square feet industrial	Proposed: 246 MF Units
Net Increase or Decrease in Maximum Density	Increase of 246 Units	
Net Increase or Decrease in Potential Floor Area	Decrease of 286,624.8 LI uses	
Population Potential	Current: Not Applicable	Proposed: 578 people
<b>Special Designation Areas</b>		
Aquatic Preserve	No	
Septic Tank Failure Area	No	
Airport Environment Zone	No	
Industrial Preservation Area	No	
Cultural Resources	No	
Archaeological Sensitivity	High and Low Sensitivity	
Historic District	No	
Coastal High Hazard/Adaptation Action Area	No	
Groundwater Aquifer Recharge Area	Discharge	
Wellhead Protection Zone	No	
Boat Facility Siting Zone	No	
Brownfield	No	
<b>Public Facilities</b>		
Potential Roadway Impact	379 Net new daily trips	
Potential Public School Impact	80 Total new students	
Water Provider	JEA	
Potential Water Impact	Increase of 48,007.4 gpd	
Sewer Provider	JEA	
Potential Sewer Impact	Increase of 36,005.6 gpd	
Potential Solid Waste Impact	Decrease of 248.94 tons per year	
Drainage Basin/Sub-basin	Trout River / Little Sixmile Creek	
Recreation and Parks	James Fields Park – southwest of site	
Mass Transit Access	Not served	
<b>Natural Features</b>		
Elevations	15' to 22'	
Land Cover	4340: Upland mixed coniferous/hardwood 1100: Residential, low density	
Soils	63: Sapelo fine sand, 0 to 2 percent slopes	

<b>Development Analysis 16.45 Acres – 716,562 sq. ft.</b>	
	66: Surrency loamy fine sand, depressional, 0 to 2 percent slopes
Flood Zones	Not applicable
Wetlands	Not applicable
Wildlife (applicable to sites greater than 50 acres)	Not applicable

## **Utility Capacity**

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

A JEA letter of service availability has been provided and is on file with the Planning and Development Department. The letter, dated March 23, 2021, identifies an available 12-inch water main along Old Kings Road. The JEA letter also provides that there is an 8-inch force main along Old Kings Road for sewage service.

The JEA letter provided special conditions for potable water and sewer connections.

Potable water connection:

“Connection point not reviewed for site fire protection requirements. Private fire protection analysis is required.”

Sewer connection:

“Connection to the JEA-owned sewer system for your project will require the design and construction of an onsite, JEA owned and maintained pump station, and a JEA dedicated force main (min. 4” dia.). Request a force main connection pressure letter through Step 2 of the SagesGov portal.”

## **Transportation**

Transportation Element Policy 1.2.1 of the 2030 Comprehensive Plan requires the use of the most current ITE Trip Generation Manual (10th Edition) to calculate the vehicular trips based on the maximum development potential for existing and proposed land uses. The subject site has a Light Industrial (LI) land use category on approximately 16.45 acres. The proposed land use amendment is to allow for Medium Density Residential (MDR) on the entire site.

In accordance with development standards for impact assessments established in the Future Land Use Element Policy 1.2.16, the existing LI land use category has a

development potential of 286,624.8 square feet of industrial space (ITE Land Use Code 110), which could generate 1,422 daily trips.

The proposed MDR land use category (ITE Code 220) has a development potential of 246 multi-family dwelling units, which could generate 1,801 daily trips.

If the land use is amended to allow for MDR development this will result in 379 net new daily trips on the roadway network.

### **Additional Information:**

**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 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 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 in Mobility Zone 9.

Subject site is accessible via Old Kings Road Street, a minor arterial facility. The proposed MDR development is generating significant daily trips and the Transportation Planning Division recommends ongoing coordinating efforts with the Traffic Engineer to ensure that a traffic operational analysis is provided to address the specific external impacts as a result of this land use amendment.

### **School Impact**

Based on the impact assessment standards detailed in FLUE Policy 1.2.16, the 16.45 acre proposed land use map amendment has a development potential of 246 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.

The available seats in the CSA and adjacent CSAs include concurrency reservations.

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

- Elementary School
  - Concurrency Service Area (CSA): 1
  - 2020/2021 enrollment: 11,133
  - Current utilization: 60%
  - New student development from amendment: 41
  - 5-year utilization: 67%
  - Available seats in CSA 1: 6,179
  - Available seats in adjacent CSAs 2 & 8: 4,775
  
- Middle School
  - CSA 1
  - 2020/2021 enrollment: 7,607
  - Current utilization: 89%
  - New student development from amendment: 17
  - 5-year utilization: 98%
  - Available seats in CSA 1: 617
  - Available seats in adjacent CSAs 2 & 8: 606
  
- High School
  - CSA 1
  - 2020/2021 enrollment: 8,520
  - Current utilization: 84%
  - New student development from amendment: 22
  - 5-year utilization: 76%
  - Available seats in CSA 1: 956
  - Available seats in adjacent CSAs 2 & 8: 815

Capacity issues will be reviewed and processed through the City's 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 was provided by the Duval County School Board. This 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.

- Pickett Elementary School (ES #205)
  - CSA 1
  - Amendment student generation: 41
  - School capacity including permanent spaces and portables: 341
  - Current enrollment 20-day count for 2020/2021: 200
  - Percent occupied: 59%
  - 4-year projection: 67%
  
- Jean Ribault Middle School (MS #212)
  - CSA 1
  - Amendment student generation: 17
  - School capacity including permanent spaces and portables: 1,041
  - Current enrollment 20-day count for 2020/2021: 747
  - Percent occupied: 72%
  - 4-year projection: 69%
  
- Jean Ribault High School (HS #96)
  - CSA 1
  - Amendment student generation: 22
  - School capacity including permanent spaces and portables: 1,683
  - Current enrollment 20-day count for 2020/2021: 1,415
  - Percent occupied: 84%
  - 4-year projection: 85%

**Archaeological Sensitivity**

According to the Duval County Archaeological Predictive Model, the subject property is located within an area of low and 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.

### **Florida Master Site File – Historic Structures**

According to the department's GIS review of the subject site, there were possible historic structures located on the property. The site was evaluated by the Historic Preservation Section of the Community Planning Division, which found that findings from a previous site survey indicated that the particular structure on the property lacked real historical significance and did not warrant consideration for listing in the National Register of Historic Places.

As such, development of the site would not have a negative effect on historic or archaeological resources.

## **PROCEDURAL COMPLIANCE**

Upon site inspection by the Planning and Development Department on August 24, 2021, the required notices of public hearing signs were posted. 27 notices were mailed out to adjoining property owners informing them of the proposed land use change and pertinent public hearing and meeting dates.

A Citizen Information Meeting was held on August 16, 2021. No one from the public was present to speak on the amendment.

## **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.

Objective 1.1 Ensure that the type, rate, and distribution of growth in the City results in compact and compatible land use patterns, and increasingly efficient urban service delivery system and discourages proliferation of urban sprawl through implementation of regulatory programs, intergovernmental coordination mechanisms, and public/private coordination.

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 1.1.21 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 1.1.25 The City will encourage the use of such smart growth practices as:

- 1. Interconnectivity of transportation modes and recreation and open space areas;
- 2. A range of densities and types of residential developments;
- 3. A mix of uses including office, commercial, and residential which encourage internal capture of trips;
- 4. Use of the Development Areas;
- 5. Revitalization of older areas and the downtown, and
- 6. Purchase of land through the Preservation Project to remove it from development and preserve it as open space, recreation or conservation use.

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.

Goal 3 To achieve a well balanced and organized combination of residential, non-residential, recreational and public uses served by a convenient

and efficient transportation network, while protecting and preserving the fabric and character of the City's neighborhoods and enhancing the viability of non-residential areas.

**Objective 3.1** Continue to maintain adequate land designated for residential uses which can accommodate the projected population and provide safe, decent, sanitary and affordable housing opportunities for the citizens. Protect single-family residential neighborhoods by requiring that any other land uses within single-family areas meet all applicable requirements described in the Development Areas and the Plan Category Descriptions of the Operative Provisions of the 2030 Comprehensive Plan and Land Development Regulations.

**Policy 3.1.6** The City shall provide for development of a wide variety of housing types by area, consistent with the housing needs characteristics and socioeconomic profiles of the City's households as described in the Housing Element.

**Recreation and Open Space Element (ROSE):**

**Policy 2.2.2** The City shall require that all new single family and multi-family developments (residential developments) dedicate land for public parkland (active recreation parks) or provide monetary contribution to the appropriate department.

**Policy 2.2.3** A residential subdivision development of 100 lots or more shall provide at least one acre of useable uplands for every 100 lots (and any fraction thereof), or 5% of the total useable uplands area to be platted, whichever is less, to be dedicated as common area and set aside for active recreation. There may be up to two areas for each 100 lots, and the areas shall be a minimum of 0.5 acres in size, unless otherwise approved by the Planning and Development Department, or by the City Council as part of a Planned Unit Development Zoning District.

**Policy 2.2.5** All multiple-family developments of 100 units or more shall provide 150 square feet of active recreation area per dwelling unit. There may be one area for each 100 units, or the areas may be combined, subject to approval by the Planning and Development.

**Pending Property Rights Element (Transmittal Ordinance 2021-334-E)**

**Goal 1** The City will recognize and respect judicially acknowledged and constitutionally protected private property rights in accordance with the Community Planning Act established in Chapter 163, Florida Statutes.

**Objective 1.1** Local decision making shall be implemented and applied with sensitivity for private property rights and shall not be unduly restrictive.

Policy 1.1.1 The City shall ensure that private property rights are considered in local decision making.

Policy 1.1.2 The following rights shall be considered in local decision making:

1. The right of a property owner to physically possess and control his or her interests in the property, including easements, leases, or mineral rights.
2. The right of a property owner to use, maintain, develop, and improve his or her property for personal use or for the use of any other person, subject to state law and local ordinances.
3. The right of the property owner to privacy and to exclude others from the property to protect the owner's possessions and property.
4. The right of a property owner to dispose of his or her property through sale or gift.

According to the Category Descriptions within the Future Land Use Element (FLUE), the Light Industrial (LI) land use category provides for the location of industrial uses which have fewer objectionable impacts than Heavy Industrial (HI) on residential areas such as noise, odor, toxic chemical and wastes.

Medium Density Residential (MDR) in the Suburban Area is intended to provide compact low to medium density mixed use development. Plan amendment requests for new MDR 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. MDR in the Suburban Development Area permits residential development of 7 DU/Acre to 20 DU/Acre when full urban services are available.

While the land use north of the site is HI, the area north of the site is zoned Industrial Business Park (IBP), which only allows for relatively low intensity industrial development. Per Section 656.321 of the Jacksonville City Code, permitted uses and structures in IBP districts are:

- (1) Medical and dental or chiropractor offices and clinics.
- (2) Hospitals.
- (3) Professional offices.
- (4) Business offices.
- (5) Banks (including drive-thru tellers) loan companies, mortgage brokers, stockbrokers and similar financial institutions.
- (6) Union halls.
- (7) Warehousing, wholesaling, distribution and similar uses, and light manufacturing, fabrication, assembling of components, printing and similar uses.
- (8) Manufacturer's agents and display rooms, offices of building trades contractor (not including outside storage or use of a vehicle in excess of one-ton capacity or any equipment, machinery, ditching machines, tractors, bulldozers or other heavy construction equipment).

- (9) Research, dental and medical laboratories, manufacturers of prosthetic appliances, dentures, eyeglasses, hearing aids and similar products.
- (10) Radio or television broadcasting offices or studios subject to Part 15 of the Zoning Code.
- (11) Vocational, technical, business, trade or industrial schools and similar uses.
- (12) Essential services, including water, sewer, gas, telephone, radio and electric, meeting the performance standards and development criteria set forth in Part 4.
- (13) Off-street parking lots for premises requiring off-street parking lots, meeting the performance standards and development criteria set forth in Part 4.
- (14) Textile Recycling Collection Bins meeting the development criteria and performance standards set forth in Part 4, Section 656.421 (Textile Recycling Bins).

The subject site will have a positive impact on the amount of land to accommodate residential uses, the proposed amendment from LI to MDR maintains a balance of uses in the area, and the zoning of the property north of the site provides for a compatible land use pattern. For these reasons, the proposed amendment is consistent with FLUE Goal 3, Policies 1.1.5 and 1.1.21.

The property is located on Old Kings Road, a minor arterial road, and at the corner of Old Kings Road and Lane Avenue North, a collector road. The subject site is also approximately 1,000 feet southeast of the corner of Old Kings Road and Pickettville Road, which is also a collector road. The proposed land use amendment promotes a balanced land development pattern consistent with FLUE Goal 3, Objective 1.1 and Policy 1.1.25 due to the mix of uses in the area. The proposed amendment to MDR would allow for increased housing options within the Suburban Area of the Northwest Planning District at a location served by centralized sewer and water. The amendment to MDR would provide a logical transition between allowed uses north of the site and would be compatible with Low Density Residential land uses South, East, and West of the subject site. The subject site itself is currently undeveloped and is proposed for infill with new housing options. Therefore, the amendment is consistent with FLUE Objectives 1.1, 3.1 and Policies 1.2.9 and 3.1.6.

Development of the site will be required to comply with ROSE Policies 2.2.2, 2.2.3, and 2.2.5, concerning the adequate provision of open space for residential developments in the Rural and Suburban Development Areas.

The proposed amendment does not hinder the private property rights of the owner of record; has no impact on the right of the property owner to possess or control his or her interest in the property; maintains the owner's ability to use, maintain, develop and improve the property; protects the owner's right to privacy and security; and maintains the ability of the property owner to dispose of the property at their discretion. Therefore, the amendment is consistent with PRE Goal 1, Objective 1.1 and Policies 1.1.1 and 1.1.2.

### **Vision Plan**

The subject property is located within the boundaries of the Northwest Vision Plan (2003). The Plan offers no specific recommendations for the location of the subject site. However,

the Plan does note the importance of having a mix of housing types with rehabilitation of existing structures and compatible new infill development at various densities. The proposed Amendment would allow for the development of additional housing stock on an undeveloped property. Therefore, the proposed land use change is consistent with the Northwest Vision Plan.

**Strategic Regional Policy Plan**

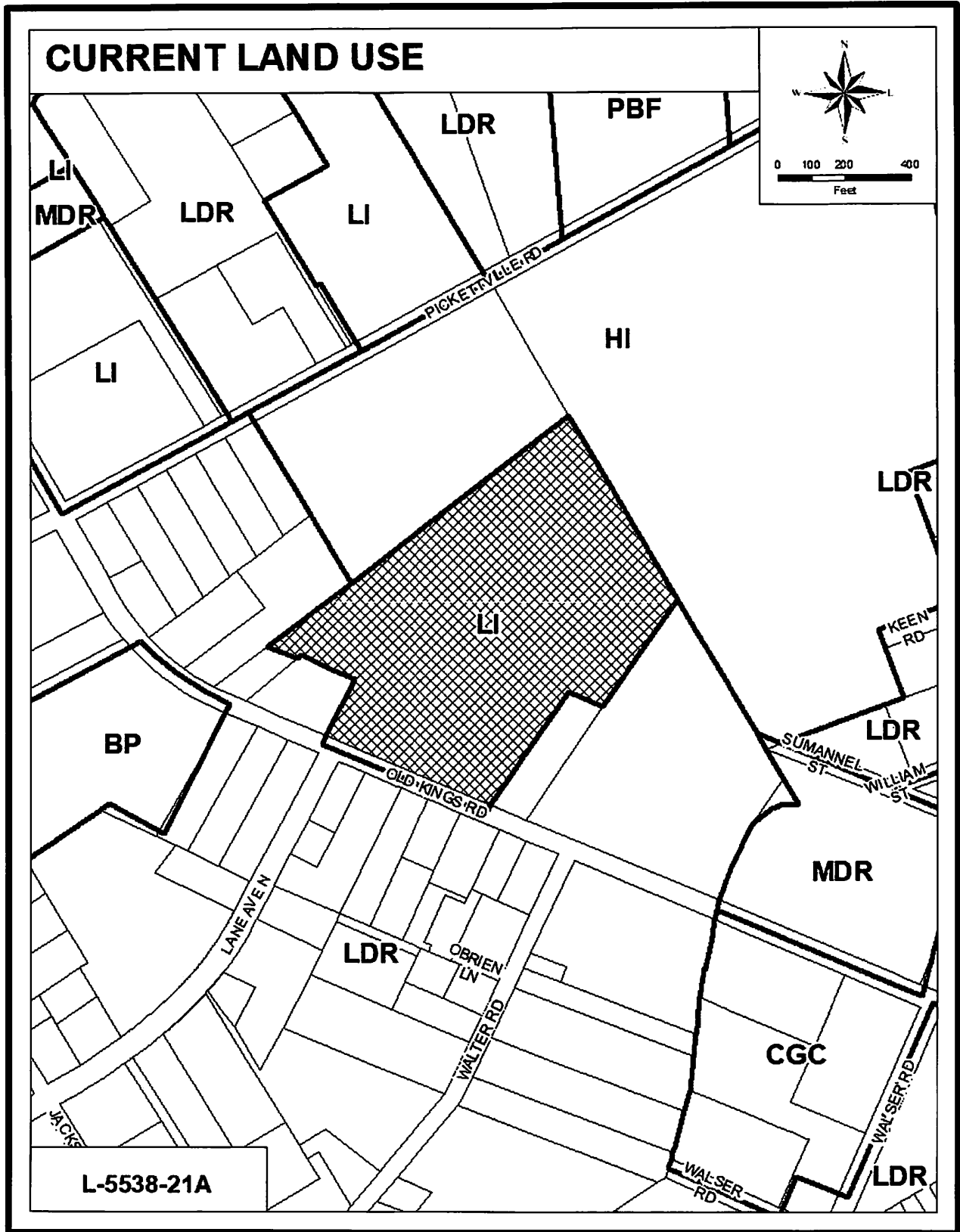
The proposed amendment is consistent with the following Objective and Policy of the Strategic Regional Policy Plan, Regional Health Subject Area:

**Objective:** Housing Options That Provide Choices to All of Our Residents and Promote Demographic and Economic Diversity as One Way to Ensure that Our Communities are Viable and Interesting Places for the Long Term.

**Policy 21:** The Region supports diverse and sufficient housing stock to provide choices for all households, from single persons to extended families with children.

The proposed land use amendment is consistent with Policy 21 of the Regional Health Subject Area as it encourages providing more housing options in the Northwest Planning District.

**CURRENT LAND USE MAP**





**LAND UTILIZATION MAP**

