

May 23, 2025  
Revised July 2, 2025

Ms. Helena Parola  
Interim Director  
City of Jacksonville Planning & Development Dept.  
214 North Hogan Street, Suite 300  
Jacksonville, FL 32202

**RE: DRI Development Order (DO) Amendment for Flagler Center DRI  
ETM No. 24-216-01**

Dear Helena:

Enclosed for your consideration is an application for a DRI Development Order (DO) Amendment to the Flagler Center DRI (f.k.a. Gran Park at Jacksonville) located in Duval County Florida. Also enclosed is a check for the application review fee in the amount of \$2,494.63.

The application contains all the necessary support information as required by the Department of Commerce application form including a traffic analysis to demonstrate the increase in the maximum allowed multi-family rights by a land use conversion will not result in additional external traffic.

The proposed changes to the Flagler Center DRI include: (i) revising Map H Conceptual Master Plan to add Residential as a permitted use on the Property; (ii) increase the maximum amount of multi-family residential development allowed by the land use conversion minimums and maximums table; (iii) extend by five (5) years the phase II, buildout, termination and downzoning protection dates for all lands in the DRI other than the Combined Parcel; (iv) extend by ten (10) years the buildout date for the Combined Parcel; and (v) extend by five (5) years the expiration date for the Combined Parcel.

We appreciate your consideration of this request. Let me know if you have any questions or need more information.

With Kind Regards,

**ENGLAND-THIMS & MILLER, INC.**

Raymond J. Spofford, AICP, CNU-A  
Vice President, Planning / Shareholder

Enclosures

cc: Ray Eubanks, Department of Economic Opportunity


STATE OF FLORIDA  
DEPARTMENT OF ECONOMIC OPPORTUNITY  
DIVISION OF COMMUNITY PLANNING & DEVELOPMENT  
The Caldwell Building, MSC 160  
107 East Madison Street  
Tallahassee, Florida 32399

**NOTIFICATION OF A PROPOSED CHANGE TO A PREVIOUSLY APPROVED  
DEVELOPMENT OF REGIONAL IMPACT (DRI)  
SUBSECTION 380.06(19), FLORIDA STATUTES**

Subsection 380.06(19), Florida Statutes, requires that submittal of a proposed change to a previously approved DRI be made to the local government, the regional planning agency, and the state land planning agency according to this form.

1. I, Raymond J. Spofford, the undersigned owner/authorized representative of Jax LC Owner 2, LLC; and Jax LC Owner 3, LLC, hereby gives notice of (developer) a proposed change to a previously approved Development of Regional Impact in accordance with Subsection 380.06(19), Florida Statutes. In support thereof, I submit the following information concerning the Flagler Center (f.k.a. Gran Park at Jacksonville) development, which information (original & current project names) is true and correct to the best of my knowledge. I have submitted today, under separate cover, copies of this completed notification to City of Jacksonville, to the Northeast Florida Regional - (local government) Planning Council, and to the Bureau of Community Planning, Department of Commerce.

June 3, 2025  
Date

  
\_\_\_\_\_  
Authorized Agent for Jax LC Owner 1, LLC; Jax  
LC Owner 2, LLC; and Jax LC Owner 3, LLC

2. Applicant (name, address, phone). **See attached Development Order Amendment Description.**
3. Authorized Agent (name, address, phone). **See attached Development Order Amendment Description.**
4. Location (City, County, Township/Range/Section) of approved DRI and proposed change. **See attached Development Order Amendment Description.**
5. Provide a complete description of the proposed change. Include any proposed changes to the plan of development, phasing, additional lands, commencement date, build-out date, development order conditions and requirements, or to the representations contained in either the development order or the Application for Development Approval. **See attached Development Order Amendment Description.**

Indicate such changes on the project master site plan, supplementing with other detailed maps, as appropriate. Additional information may be requested by the Department or any reviewing agency to clarify the nature of the change or the resulting impacts. **See attached Development Order Amendment Description.**

6. Complete the attached Substantial Deviation Determination Chart for all land use types approved in the development. If no change is proposed or has occurred, indicate no change. **See Exhibit B.**
7. List all the dates and resolution numbers (or other appropriate identification numbers) of all modifications or amendments to the originally approved DRI development order that have been adopted by the local government, and provide a brief description of the previous changes (i.e., any information not already addressed in the Substantial Deviation Determination Chart). Has there been a change in local government jurisdiction for any portion of the development since the last approval or development order was issued? If so, has the annexing local government adopted a new DRI development order for the project? **See attached Development Order Amendment Description.**
8. Describe any lands purchased or optioned within 1/4 mile of the original DRI site subsequent to the original approval or issuance of the DRI development order. Identify such land, its size, intended use, and adjacent non-project land uses within 1/2 mile on a project master site plan or other map. **None.**
9. Indicate if the proposed change is less than 40% (cumulatively with other previous changes) of any of the criteria listed in Paragraph 380.06(19)(b), Florida Statutes.

Do you believe this notification of change proposes a change which meets the criteria of Subparagraph 380.06(19)(e)2., F.S.

YES \_\_\_\_\_

NO   X

10. Does the proposed change result in a change to the buildout date or any phasing date of the project? If so, indicate the proposed new buildout or phasing dates. **See attached Development Order Amendment Description.**

11. Will the proposed change require an amendment to the local government comprehensive plan? **No.**

Provide the following for incorporation into such an amended development order, pursuant to Subsections 380.06 (15), F.S., and 73-40.025, Florida Administrative Code:

12. An updated master site plan or other map of the development portraying and distinguishing the proposed changes to the previously approved DRI or development order conditions. **See attached Exhibits B and C.**

13. Pursuant to Subsection 380.06(19)(f), F.S., include the precise language that is being proposed to be deleted or added as an amendment to the development order. This language should address and quantify:

- a. All proposed specific changes to the nature, phasing, and build-out date of the development; to development order conditions and requirements; to commitments and representations in the Application for Development Approval; to the acreage attributable to each described proposed change of land use, open space, areas for preservation, green belts; to structures or to other improvements including locations, square footage, number of units; and other major characteristics or components of the proposed change;
- b. An updated legal description of the property, if any project acreage is/has been added or deleted to the previously approved plan of development;
- c. A proposed amended development order deadline for commencing physical development of the proposed changes, if applicable;
- d. A proposed amended development order termination date that reasonably reflects the time required to complete the development;
- e. A proposed amended development order date until which the local government agrees that the changes to the DRI shall not be subject to down-zoning, unit density reduction, or intensity reduction, if applicable; and
- f. Proposed amended development order specifications for the annual report, including the date of submission, contents, and parties to whom the report is submitted as specified in Subsection 73C-40.025 (7), F.A.C.

**See attached Development Order Amendment Description and Exhibit A.**

**FLAGLER CENTER**  
**Development Order Amendment Description**  
**May 23, 2025**  
**Revised July 2, 2025**

1.     **Applicant**

Paul M. Harden, Esq.  
1431 Riverplace Boulevard, Suite 901  
Jacksonville, FL 32207  
(904) 396-5731  
E-mail: [paul@hardenlawoffice.com](mailto:paul@hardenlawoffice.com)

England-Thims & Miller, Inc.  
Raymond J. Spofford, AICP, CNU-A  
14775 Old St. Augustine Road  
Jacksonville, Florida 32258  
Phone: (904) 642-8990  
E-mail: [spoffordr@etminc.com](mailto:spoffordr@etminc.com)

2.     **Owner**

Jax LC Owner 2, LLC and Jax LC Owner 3, LLC  
14000 Citicards Way, Jacksonville, FL 32258  
Jacksonville, Florida 32258

3.     **Tax Parcel Numbers**

A portion of 168126 2610 in Flagler Center and 168126 2810 (the “Property”)

4.     **Proposed Changes**

This application for a Development Order Amendment (the “Amendment Application”) to the Flagler Center DRI is submitted on behalf of Jax LC Owner 2, LLC and Jax LC Owner 3, LLC. This Amendment Application consists of a completed State of Florida Department of Economic Opportunity, Bureau of Community Planning Form DEO-BCP-PROPCHANGE-1 and this Development Order Description, as well as all referenced exhibits, including the specific, proposed ordinance changes to the Flagler Center DRI attached as Exhibit A to this Amendment Application.

The Flagler Center DRI Development Order was adopted by the Jacksonville City Council by Resolution 89-821-339 on September 26, 1989 and was subsequently amended by Ordinance 2001-497-E, adopted June 26, 2001, Ordinance 2001-1156-E, adopted December 11, 2001, Ordinance 2003-596-E, adopted June 10, 2003, Ordinance 2005-87-E adopted February 8, 2005, Ordinance 2007-1347-E adopted January 22, 2008, Ordinance 2012-455-E adopted August 28, 2012, Ordinance 2013-307-E adopted June 25, 2013, Ordinance 2015-548-E adopted September

8, 2015, Ordinance 2018-518-E adopted September 11, 2018, Ordinance 2019-0489-E adopted August 27, 2019, Ordinance 2020-346-E adopted September 8, 2020, and Ordinance 2021-200-E adopted May 25, 2021.

Flagler Center DRI has developed into a mixed use development consisting of light industrial, office, residential, hotel, retail and hospital uses. The proposed changes to the Flagler Center DRI Development Order include: (i) revising Map H Conceptual Master Plan to allow Mixed Use (MU) on the Property; (ii) increase the maximum amount of multi-family residential development allowed by the land use conversion minimums and maximums table; (iii) extend by five (5) years the phase II, buildout, termination and downzoning protection dates for all lands in the DRI other than the Combined Parcel; (iv) extend by ten (10) years the buildout date for the Combined Parcel; and (v) extend by five (5) years the expiration date for the Combined Parcel. Increasing the potential for multi-family dwelling units will allow for housing options in proximity to employees within the DRI without any increase in off-site traffic impacts.

This Development Order Amendment does not involve an increase or decrease of development rights. The current uses allowed within the Flagler Center DRI, with conversions made to date, are as follows:

Industrial	81 acres
Office	3,450,002 sq. ft. (including 600,000 sq. ft. from Bartram Park)
Commercial	200,000 sq. ft.
Hospital	500 Beds
Hotel	250 Rooms
Multi-Family Residential (MF)	3,115 Dwelling Units
Single Family Residential (SF)	79 Dwelling Units
Senior Care	30 Beds
Senior Housing	0 Dwelling Units

The proposed change would increase the maximum multi-family residential development allowed by the land use conversion minimums and maximums table. The current DRI Development Order approved land use minimums and maximums are listed below with the proposed change in a strikethrough and underline format:

	<u>Minimum</u>	<u>Maximum</u>
Industrial	45 acres	150 acres
Office (including 600,000 sq. ft. from Bartram Park)	2,500,000 sq. ft.	4,700,000 sq. ft.
Commercial	80,000 sq. ft.	220,000 sq. ft.
Hospital	250 Beds	500 Beds
Hotel	150 Rooms	300 Rooms
Multi-Family Residential (MF)	400 Dwelling Units	<del>3,200</del> <u>3,950</u> Dwelling Units
Single Family Residential (SF)	0 Dwelling Units	150 Dwelling Units
Senior Care (SC)	0 Beds	350 Beds
Senior Housing (SH)	0 Dwelling Units	500 Dwelling Units

### **Exhibit List**

Exhibit A	Proposed Development Order Revisions
Exhibit B	Current Map H Conceptual Master Plan
Exhibit C	Proposed Map H Conceptual Master Plan
Exhibit D	Authorization Letter
Exhibit E	Traffic Impact Analysis

## **Exhibit A**

**Section 1.** On page 6 of Exhibit B of Resolution 89-821-339 (Specific Conditions: Land Use) as subsequently amended, this section is hereby amended as follows:

The total amount of development, subject to limited conversion rights, is ~~75~~ 81 acres of Light Industrial development, ~~3,742,896~~ 3,450,002 square feet of Office development, 200,000 square feet of Commercial development, 500 Hospital Beds, 250 Hotel Rooms, ~~2,499~~ 3,115 Multi-Family Residential Dwelling Units, 79 Single Family Residential Dwelling Units, 30 Senior Care Beds, and 0 Senior Adult Dwelling Units.

The Applicant shall be allowed to interchange land use types at a conversion ratio of:

1 acre Lt. Industrial	=6,100 Sq. Ft. Office
1 acre Lt. Industrial	=795 Sq. Ft. Commercial
1 acre Lt. Industrial	=5.95 Hospital Beds
1 acre Lt. Industrial	= 33.0 Senior Care Bed
1 acre Lt. Industrial	= 26.889 Senior Adult Dwelling Unit
1,000 Sq. Ft. Commercial	=7,673 Sq. Ft. Office
1,000 Sq. Ft. Commercial	=1.25 acre Light Industrial
1,000 Sq. Ft. Commercial	=4.48 Hospital Beds
1,000 Sq. Ft. Commercial	=6.048 Multi-Family Dwellings
1,000 Sq. Ft. Commercial	=6.356 Hotel Rooms
1,000 Sq. Ft. Commercial	=3.693 Single Family Dwellings
1,000 Sq. Ft. Commercial	=16.955 Senior Care Bed
1,000 Sq. Ft. Commercial	=13.815 Senior Adult Dwelling Unit
1,000 Sq. Ft. Office	=130 Sq. Ft. Commercial
1,000 Sq. Ft. Office	=0.164 acre Light Industrial
1,000 Sq. Ft. Office	=1.22 Hospital Beds
1,000 Sq. Ft. Office	=2.403 Multi-Family Dwellings
1,000 Sq. Ft. Office	=2.525 Hotel Rooms
1,000 Sq. Ft. Office	=1.475 Single Family Dwellings
1,000 Sq. Ft. Office	=6.773 Senior Care Bed
1,000 Sq. Ft. Office	=5.519 Senior Adult Dwelling Unit
1 Hospital Bed	=0.168 acre Light Industrial
1 Hospital Bed	=819 Sq. Ft. Office
1 Hospital Bed	=223 Sq. Ft. Commercial
1 Hospital Bed	=1.968 Multi-Family Dwelling
1 Hospital Bed	=2.068 Hotel Rooms
1 Hospital Bed	=1.297 Single Family Dwelling
1 Hospital Bed	=5.955 Senior Care Bed
1 Hospital Bed	=4.852 Senior Adult Dwelling Unit
1 Multi-Family Dwelling	=165 Sq. Ft. Commercial
1 Multi-Family Dwelling	=416 Sq. Ft. Office



1 Multi-Family Dwelling	=0.51 Hospital Beds
1 Multi-Family Dwelling	=0.085 acre Light Industrial
1 Multi-Family Dwelling	=1.05 Hotel Rooms
1 Multi-Family Dwelling	=0.614 Single Family Dwelling
1 Multi-Family Dwelling	=2.818 Senior Care Bed
1 Multi-Family Dwelling	=2.296 Senior Adult Dwelling Unit
1 Hotel Room	=157 Sq. Ft. Commercial
1 Hotel Room	=395 Sq. Ft. Office
1 Hotel Room	=0.484 Hospital Beds
1 Hotel Room	=0.081 acre Light Industrial
1 Hotel Room	=0.952 Multi-Family Dwelling
1 Hotel Room	=0.584 Single Family Dwelling
1 Hotel Room	=2.682 Senior Care Bed
1 Hotel Room	=2.185 Senior Adult Dwelling Unit
1 Single Family Dwelling	=271 Sq. Ft. Commercial
1 Single Family Dwelling	=678 Sq. Ft. Office
1 Single Family Dwelling	=0.771 Hospital Beds
1 Single Family Dwelling	=0.139 acre Light Industrial
1 Single Family Dwelling	=1.712 Hotel Rooms
1 Single Family Dwelling	=1.629 Multi-Family Dwellings
1 Single Family Dwelling	=4.591 Senior Care Bed
1 Single Family Dwelling	=3.741 Senior Adult Dwelling Unit
1 Senior Care Bed	=59 Sq. Ft. Commercial
1 Senior Care Bed	=148 Sq. Ft. Office
1 Senior Care Bed	=0.168 Hospital Beds
1 Senior Care Bed	=0.03 acre Light Industrial
1 Senior Care Bed	=0.355 Multi-Family Dwelling
1 Senior Care Bed	=0.218 Single Family Dwelling
1 Senior Care Bed	=0.373 Hotel Rooms
1 Senior Care Bed	=0.815 Senior Adult Dwelling Unit
1 Senior Adult Dwelling Unit	=72 Sq. Ft. Commercial
1 Senior Adult Dwelling Unit	=181 Sq. Ft. Office
1 Senior Adult Dwelling Unit	=0.206 Hospital Beds
1 Senior Adult Dwelling Unit	=0.037 acre Light Industrial
1 Senior Adult Dwelling Unit	=0.435 Multi-Family Dwelling
1 Senior Adult Dwelling Unit	=0.267 Single Family Dwelling
1 Senior Adult Dwelling Unit	=0.458 Hotel Rooms
1 Senior Adult Dwelling Unit	=1.227 Senior Care Bed

Provided, however that the allowable land uses as converted, shall be within the following minimum and maximum amounts:

	Minimum	Maximum
Industrial	45 acres	150 acres
Office	2,500,000 sq. ft.	4,700,000 sq. ft. (including 600,000 sq. ft. from Bartram Park)
Commercial	80,000 sq. ft.	220,000 sq. ft.
Hospital	250 Beds	500 Beds
Hotel	150 Rooms	300 Rooms
Multi-Family_Residential (MF)	400 Dwelling Units	<del>3,200</del> 3,950 Dwelling Units
Single Family_Residential (SF)	0 Dwelling Units	150 Dwelling Units
Senior Care (SC)	0 Beds	350 Beds
Senior Housing (SH)	0 Dwelling Units	500 Dwelling Units

**Section 2.** The phase II, build out, termination and downzoning protection dates of the Flagler Center DRI Development Order is May 21, ~~2028~~ 2033 for all lands within the DRI other than the Combined Parcel. The buildout date for the Combined Parcel is November 24, ~~2023~~ 2033 and the expiration date for the Combined Parcel is March 25, ~~2030~~ 2035. ~~The termination and downzoning protection date of the Flagler Center DRI Development Order is May 23, 2033.~~

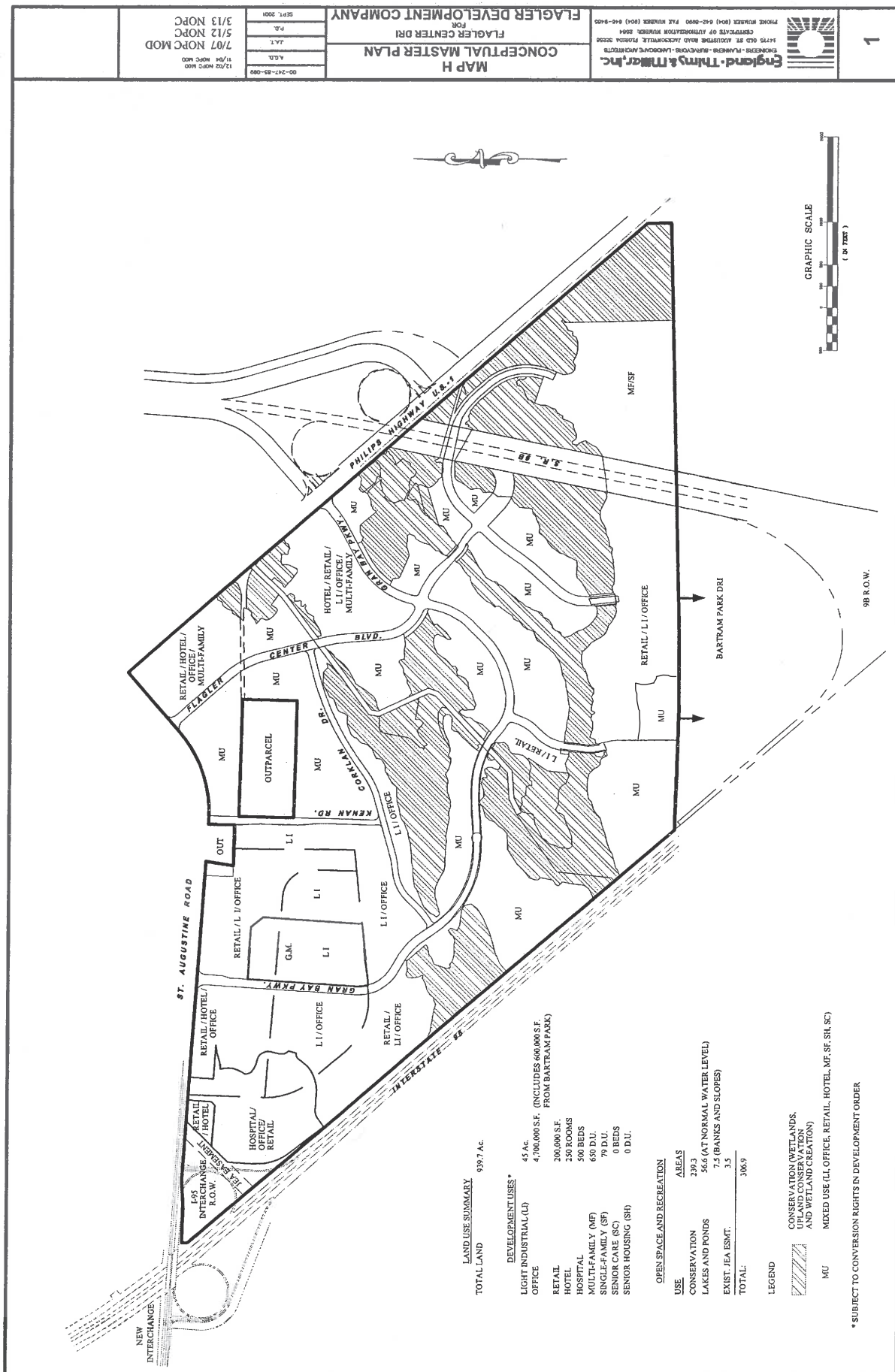
**Section 3.** The Council has reviewed the proposed change to the Flagler Center DRI and has determined that such changes do not constitute a substantial deviation as such term is defined in Section 380.06(19), Florida Statutes.

**Section 4.** This Ordinance supersedes any conflicting provisions of the previously approved development order, the application for development approval and any amendments, supplements or interpretations thereof previously issued by or on behalf of the City.

**Section 5.** This Ordinance shall become effective upon signature of the Mayor or upon becoming effective without the Mayor's signature.

## **Exhibit B**

### **Current Map H Conceptual Master Plan**



## **Exhibit C**

### **Proposed Map H Conceptual Master Plan**

**MAP H**  
**CONCEPTUAL MASTER PLAN**  
**FLAGLER CENTER DRI**



ETM  
ENGLAND-THIMS & MILLER

**Trusted  
Advisors,  
Creating  
Community**

14775 Old St. Augustine Rd.  
Jacksonville, Florida 32258  
(904) 642-8990  
www.etmhc.com  
REG-00002584 LC-0000316

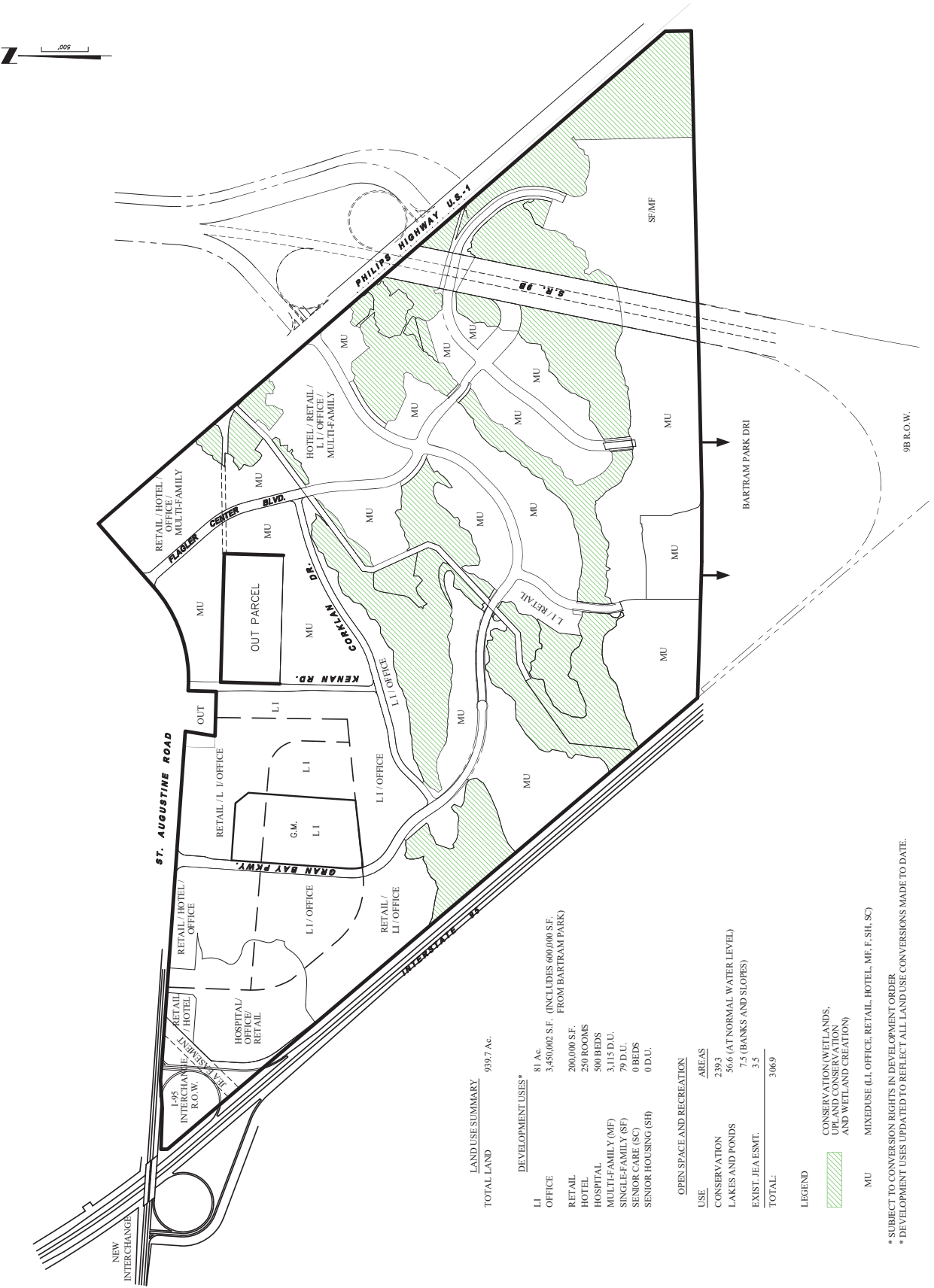
0316

ETM NO. 00-247	DRAWN BY: D	DESIGNED BY: A	CHECKED BY: J
----------------	-------------	----------------	---------------

REVISIONS:	24	DOM	ADD.	INT.
------------	----	-----	------	------

PLANS PREPARED UNDER THE DIRECTION OF:	

PLOTTED: May 29, 2025 - 9:20 AM, BY: The McGraw-Hill Companies



LAND USE SUMMARY  
TOTAL LAND 939.7 Ac.

**DEVELOPMENT USES\***

LI  
OFFICE  
RETAIL  
HOTEL  
HOSPITAL  
MULTI-FAMILY (MF)  
SINGLE-FAMILY (SF)  
SENIOR CARE (SC)  
SENIOR HOUSING (SH)

USE	AREAS
CONSERVATION	239.3
LAKES AND PONDS	56.6
EXIST. JEASMT.	7.5
TOTAL:	306.9

LEGEND

CONSERVATION (WETLANDS, UPLAND CONSERVATION AND WETLAND CREATION)

\* SUBJECT TO CONVERSION RIGHTS IN DEVELOPMENT ORDER  
\* DEVELOPMENT USES UPDATED TO REFLECT ALL LAND USE CONVERSIONS MADE TO DATE.

**Exhibit D**

**Affidavit of Property Ownership and Designation of Agent**



City of Jacksonville  
Planning & Development Department  
214 N. Hogan Street, Suite 300  
Jacksonville, Florida 32202

**AFFIDAVIT OF PROPERTY OWNERSHIP AND DESIGNATION OF AGENT**  
**Corporation/Partnership/Trust/Other Entity**

Jax LC Owner 1, LLC; Jax LC Owner 2, LLC; and Jax LC Owner 3, LLC

Owner Name

14000 Citicards Way, Jacksonville, FL 32258

Address(es) for Subject Property

168126 2710; 168126 2610; and 168126 2810

Real Estate Parcel Number(s) for Subject Property

Paul Harden and England-Thims & Miller, Inc.

Appointed or Authorized Agent(s)

DRI Development Order Amendment and PUD Minor Modifications to Flagler Center & Bartram Park PUDs

Type of Request(s)/Application(s)

STATE OF FLORIDA  
COUNTY OF ORANGE

BEFORE ME, the undersigned authority, this day personally appeared Christopher Wideman, hereinafter also referred to as "Affiant", who being by me first duly sworn, under oath, deposes and states as follows:


1. Affiant is the \_\_\_\_\_ of \_\_\_\_\_, a \_\_\_\_\_ (the "Entity") that is the owner and record title holder of the property described above and more specifically in the attached legal description (the "Subject Property"), which property is the subject of the above-noted request(s)/application(s) being made to the City of Jacksonville.\*
2. Affiant affirms that he/she is authorized to execute this Affidavit on behalf of the aforesaid Entity.
3. That I, the undersigned, as an authorized representative of the Entity, have appointed, and do hereby appoint, the above-noted person(s)/entity as agent(s) to act on behalf of said Entity in connection with the above-referenced request(s)/application(s). Said agent(s) is/are authorized and empowered to act as agent to file application(s) for land use amendment(s), rezoning(s), and/or other development permits for the Subject Property and, in connection with such authorization, to file such applications, papers, documents, requests and other matters necessary to effectuate and pursue such requested change(s) and/or development permit(s) and including appearances before all City boards, commissions or committees on behalf of the application(s). In authorizing the agent(s) named herein to represent the Entity, I attest that the application(s) is/are made in good faith.

PREVIOUS VERSIONS OF THIS FORM ARE OBSOLETE



4. Affiant further acknowledges that any change in ownership of the Subject Property and/or the designated agent(s) that occur prior to the date of final public hearing or City Council action on the application(s) associated herewith shall require that a new Affidavit of Property Ownership and Designation of Agent be submitted to the City of Jacksonville Planning and Development Department to reflect any such changes.
5. I acknowledge and affirm that I am familiar with the nature of an oath and with the penalties provided by the laws of the State of Florida for falsely swearing to statements under oath. Under penalty of perjury, I hereby declare that I have examined this Affidavit and to the best of my knowledge and belief, it is true, correct and complete.

**FURTHER AFFIANT SAYETH NAUGHT.**

  
Signature of Affiant  
Christopher Wideman  
Printed/Typed Name of Affiant

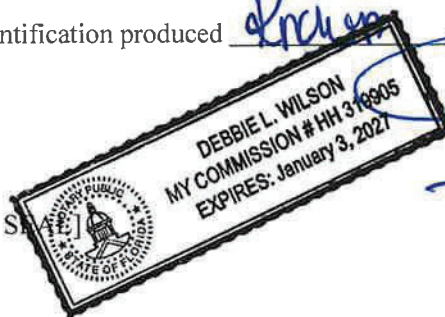
\* Affiant shall provide documentation illustrating that Affiant is an authorized representative of the entity-owner of the Subject Property. This may be shown through a corporate resolution, power of attorney, printout from Sunbiz.org, trust agreement, etc.

**NOTARIAL CERTIFICATE**

Sworn to and subscribed before me by means of ☒ physical presence or ☐ online notarization, this 13<sup>th</sup> day of May, 2025, by Christopher Wideman as Owner for Gayle Owner 1, 2 & 3, who is ☒ personally known to me or ☐ has produced identification and who took an oath.

Type of identification produced known

[NOTARY SEAL]



  
Notary Public Signature

Debbie L Wilson  
Printed/Typed Name – Notary Public

My commission expires: Jan 3, 2027

**NOTE: APPLICATIONS SUBMITTED WITH AN INCORRECTLY COMPLETED, INCOMPLETE, OR ALTERED AFFIDAVIT OF PROPERTY OWNERSHIP AND DESIGNATION OF AGENT FORM(S) WILL NOT BE PROCESSED.**

**PREVIOUS VERSIONS OF THIS FORM ARE OBSOLETE**

## **Exhibit E**

### **Traffic Impact Analysis**

# MEMORANDUM

---

To: Ray Spofford, AICP

From: Jeffrey A. Crammond, PE, PTOE, PTP

Date: May 12, 2025

Re: ***Flagler Center – 2025 NOPC***

As requested, I have reviewed the proposed change in the development rights to determine if there will be any increase in off-site traffic associated with the proposed 750 unit increase in the maximum number of multi-family units. The land use conversion table was established to allow the conversion between land uses on a trip neutral basis. However, the conversion table was based on gross trip and not net new trip leaving the property. Based the existing and proposed minimum and maximums I developed a series of three tables illustrating the calculation of net new external trips based on the procedures and methodologies contained in the 11<sup>th</sup> edition of the Trip Generation Manual and 3<sup>rd</sup> edition of the Trip Generation Handbook. The first table calculates daily and pm peak hour trips based on the approved land uses. The second (Scenario B) converts office space to achieve the additional 750 multi-family units. Scenario C converts retail uses to multi-family.

Table 1 illustrates the calculation of net external traffic associated with the approved uses. As stated previously, there are three uses that have a significant impact on the number of internal trips. These include multi-family, office and retail uses. The Flagler Center DRI is primarily a non-residential development with significantly more potential for internal trips associated with the non-residential uses than the corresponding potential internal trips associated with the residential uses. Therefore, any increase in residential uses will help maximize the potential for internal traffic. Table 2 illustrates the trip generation for Scenario B where the office uses are decreased by 312,000 square feet and the number of multi-family units is increased by 750. The resulting number of new external trips decreases by 64 when compared to the approved uses.

# MEMORANDUM

---

The last scenario (Scenario C) assumes that the retail uses are decreased by 123,750 square feet and the number of multi-family units is increased by 750. The resulting number of external trips decreases by 147 when compared to the approved uses.

In summary, if we reduce retail or if we decrease office space to obtain the additional multi-family units, external traffic is expected to decrease slightly. Based on this analysis, the increase in the maximum number of multi-family units has the potential to decrease the net external traffic and therefore the impacts associated with the Flagler Center DRI.

**Table 1**  
**2025 NOPC**  
**Flagler Center (Gran Park at Bayard)**  
**Approved Uses Trip Generation Estimates**

Land Use	ITE Land Use Code	Size (Number of Units)	Independent Variable (Units)	Daily		PM Peak Hour			
				Estimation Method (Rate or Equation)	Gross Trip Ends	Estimation Method (Rate or Equation)	Gross Hour Trip Ends	Internal Hour Trip Ends	Net New Hour Trips
Industrial <sup>1</sup>	110	1,012,500	Sq. Ft.	$T = 3.79x + 57.96$	3,895	$\ln(T) = 0.69 \cdot \ln(x) + 0.43$	182	0	182
Single Family	210	79	DUs	$\ln(T) = 0.92 \cdot \ln(x) + 2.71$	837	$\ln(T) = 0.96 \cdot \ln(x) + 0.20$	81	9	72
Multi Family	220	3,115	DUs	$T = 7.56x - 40.86$	23,509	$\ln(T) = 0.89 \cdot \ln(x) - 0.02$	1,260	132	1,128
Hotel	310	250	Rooms	$T = 11.29x - 426.97$	2,396	$T = 0.75x - 26.02$	161	82	79
Hospital	610	500	Beds	$T = 12.30x + 3096.68$	9,247	$T = 2.08x - 104.00$	936	0	936
Office	710	3,450,002	Sq. Ft.	$\ln(T) = 0.97 \cdot \ln(x) + 2.50$	32,917	$\ln(T) = 0.95 \cdot \ln(x) + 0.36$	3,291	98	3,193
Retail	820	200,000	Sq. Ft.	$\ln(T) = 0.68 \cdot \ln(x) + 5.57$	9,632	$\ln(T) = 0.74 \cdot \ln(x) + 2.89$	908	141	767
							<b>Total Net New PM Peak Hour Trips</b>		<b>6,357</b>

Reference: ITE Trip Generation, 10<sup>th</sup> Edition, 2017.

## Table 2

[illegible]

Reference: ITE Trip Generation, 10<sup>th</sup> Edition, 2017.

<sup>1</sup> Building are for industrial development was assumed to be 12,500 sf per acre

<sup>2</sup> Multi-Family units equals 312,000 sf of office space (750 x 416 = 312,000)

**Table 3**

**Flagler Center (Gran Park at Bayard)  
Scenario C Trip Generation Estimates**

Land Use	ITE Land Use Code	Size (Number of Units)	Independent Variable (Units)	Daily Estimation Method (Rate or Equation)	Gross Daily Trip Ends	PM Peak Hour Estimation Method (Rate or Equation)	Gross P.M. Peak Hour Trip Ends	Internal P.M. Peak Hour Trip Ends	Net New PM Peak Hour Trips
Industrial	110	1,012,500	Acres	$T = 3.79x + 57.96$	3,895	$\ln(T) = 0.69 \cdot \ln(x) + 0.43$	182	0	182
Single Family	210	79	DUs	$\ln(T) = 0.92 \cdot \ln(x) + 2.71$	837	$\ln(T) = 0.96 \cdot \ln(x) + 0.20$	81	7	74
Multi Family	220	3,865	DUs	$T = 7.56x - 40.86$	29,179	$\ln(T) = 0.89 \cdot \ln(x) - 0.02$	1,527	129	1,398
Hotel	310	250	Rooms	$T = 11.29x - 426.97$	2,396	$T = 0.75x - 26.02$	161	90	71
Hospital	610	500	Beds	$T = 12.30x + 3096.68$	9,247	$T = 2.08x - 104.00$	936	0	936
Office	710	3,450,002	Sq. Ft.	$\ln(T) = 0.97 \cdot \ln(x) + 2.50$	32,917	$\ln(T) = 0.95 \cdot \ln(x) + 0.36$	3,291	87	3,204
Retail	820	76,250	Sq. Ft.	$\ln(T) = 0.68 \cdot \ln(x) + 5.57$	5,000	$\ln(T) = 0.74 \cdot \ln(x) + 2.89$	445	100	345
							<b>Total Net New PM Peak Hour Trips</b>		<b>6,210</b>
								<b>Net Change</b>	<b>-147</b>

Reference: ITE Trip Generation, 10<sup>th</sup> Edition, 2017.

<sup>1</sup> Building are for industrial development was assumed to be 12,500 sf per acre

<sup>2</sup> 750 Multi-Family units equals 123,750 sf of retail space (750 x 165 = 123,750)

# MEMORANDUM

---

To: Ray Spofford, AICP

From: Jeffrey A. Crammond, PE, PTOE, PTP

Date: June 12, 2025

Re: ***Flagler Center – 2025 NOPC***

As requested, I have reviewed the proposed change in the development rights to determine if there will be any increase in off-site traffic associated with the proposed 750 unit increase in the maximum number of multi-family units. The land use conversion table was established to allow the conversion between land uses on a trip neutral basis. However, the conversion table was based on gross trip and not net new trip leaving the property. Based the existing and proposed minimum and maximums I developed a series of three tables illustrating the calculation of net new external trips based on the procedures and methodologies contained in the 11<sup>th</sup> edition of the Trip Generation Manual and 3<sup>rd</sup> edition of the Trip Generation Handbook. The first table calculates daily and pm peak hour trips based on the approved land uses. The second (Scenario B) converts office space to achieve the additional 750 multi-family units. Scenario C converts retail uses to multi-family.

Table 1 illustrates the calculation of net external traffic associated with the approved uses. As stated previously, there are three uses that have a significant impact on the number of internal trips. These include multi-family, office and retail uses. The Flagler Center DRI is primarily a non-residential development with significantly more potential for internal trips associated with the non-residential uses than the corresponding potential internal trips associated with the residential uses. Therefore, any increase in residential uses will help maximize the potential for internal traffic. Table 2 illustrates the trip generation for Scenario B where the office uses are decreased by 312,000 square feet and the number of multi-family units is increased by 750. The resulting number of new external trips decreases by 64 vph when compared to the approved uses.



# MEMORANDUM

---

The last scenario (Scenario C) assumes that the retail uses are decreased by 123,750 square feet and the number of multi-family units is increased by 750. The resulting number of external trips decreases by 147 vph when compared to the approved uses.

In summary, if we reduce retail or if we decrease office space to obtain the additional multi-family units, external traffic is expected to decrease slightly. Based on this analysis, the increase in the maximum number of multi-family units has the potential to decrease the net external traffic and therefore the impacts associated with the Flagler Center DRI.



## Table 2

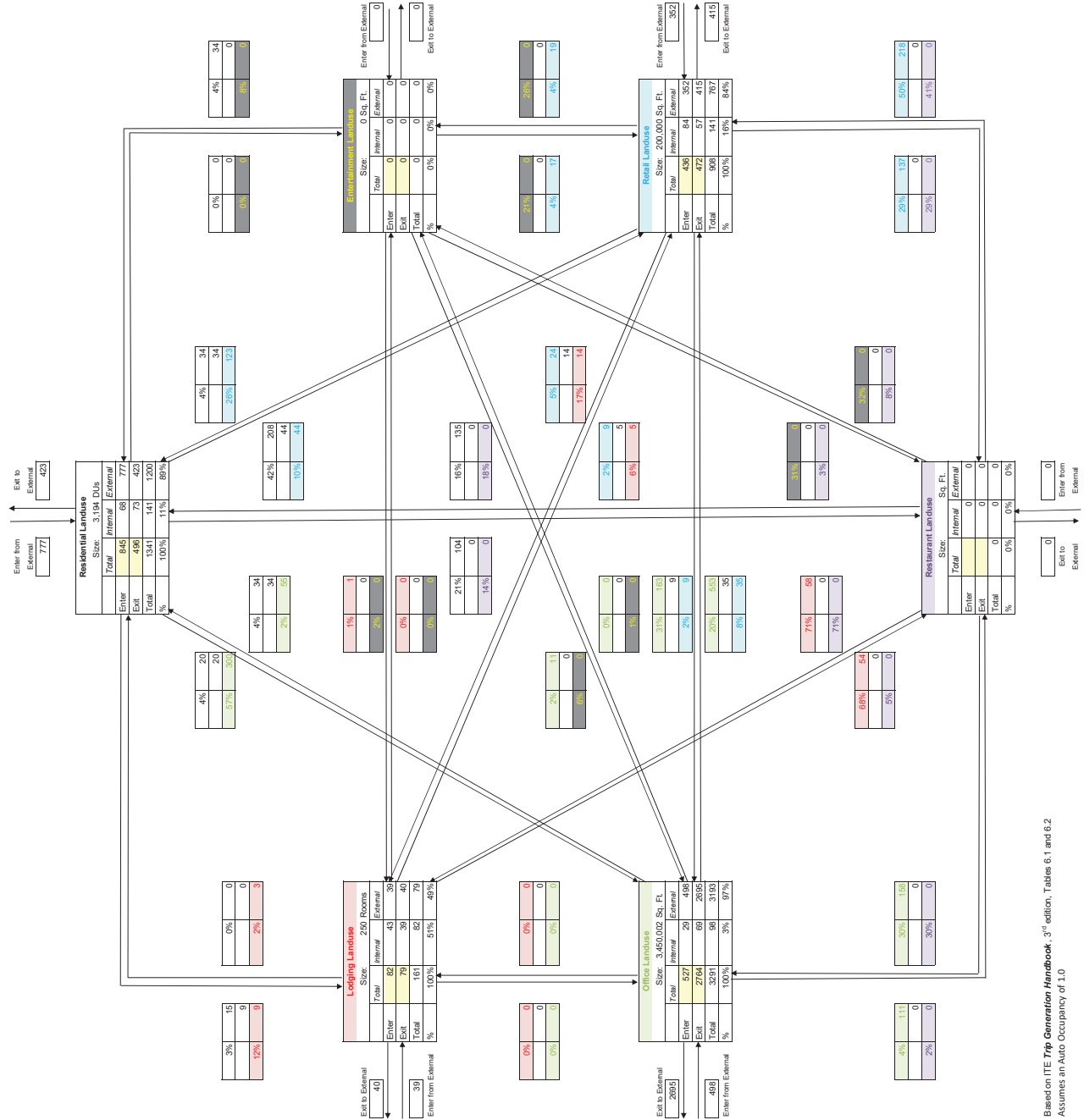
[illegible]Reference: ITE Trip Generation, 10<sup>th</sup> Edition, 2017.

<sup>1</sup> Building are for industrial development was assumed to be 12,500 sf per acre

<sup>2</sup> Multi-Family units equals 312,000 sf of office space (750 x 416 = 312,000)

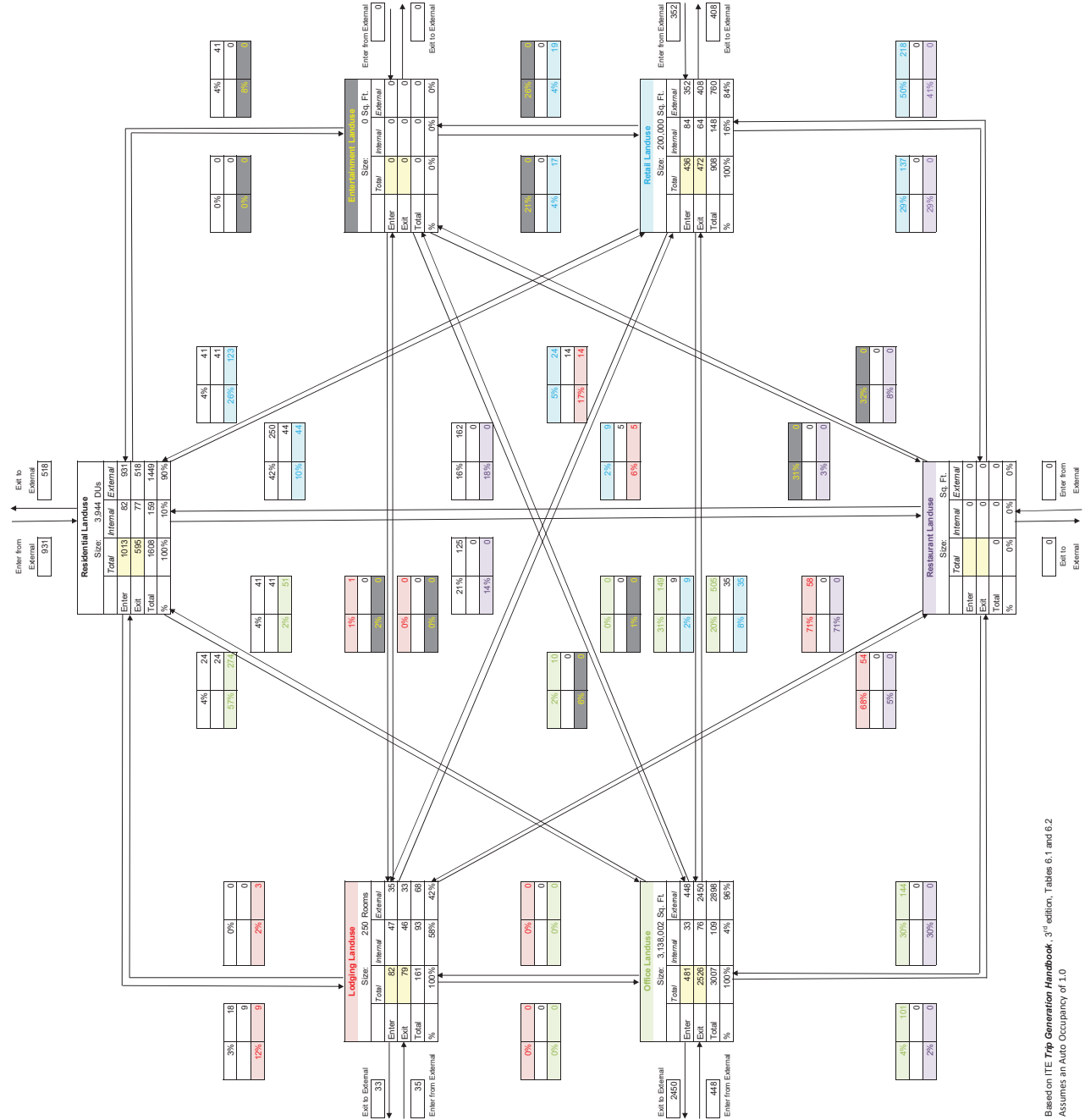


PM Peak Hour  
Approved Uses Trip Generation Estimates  
Internal Capture Matrix



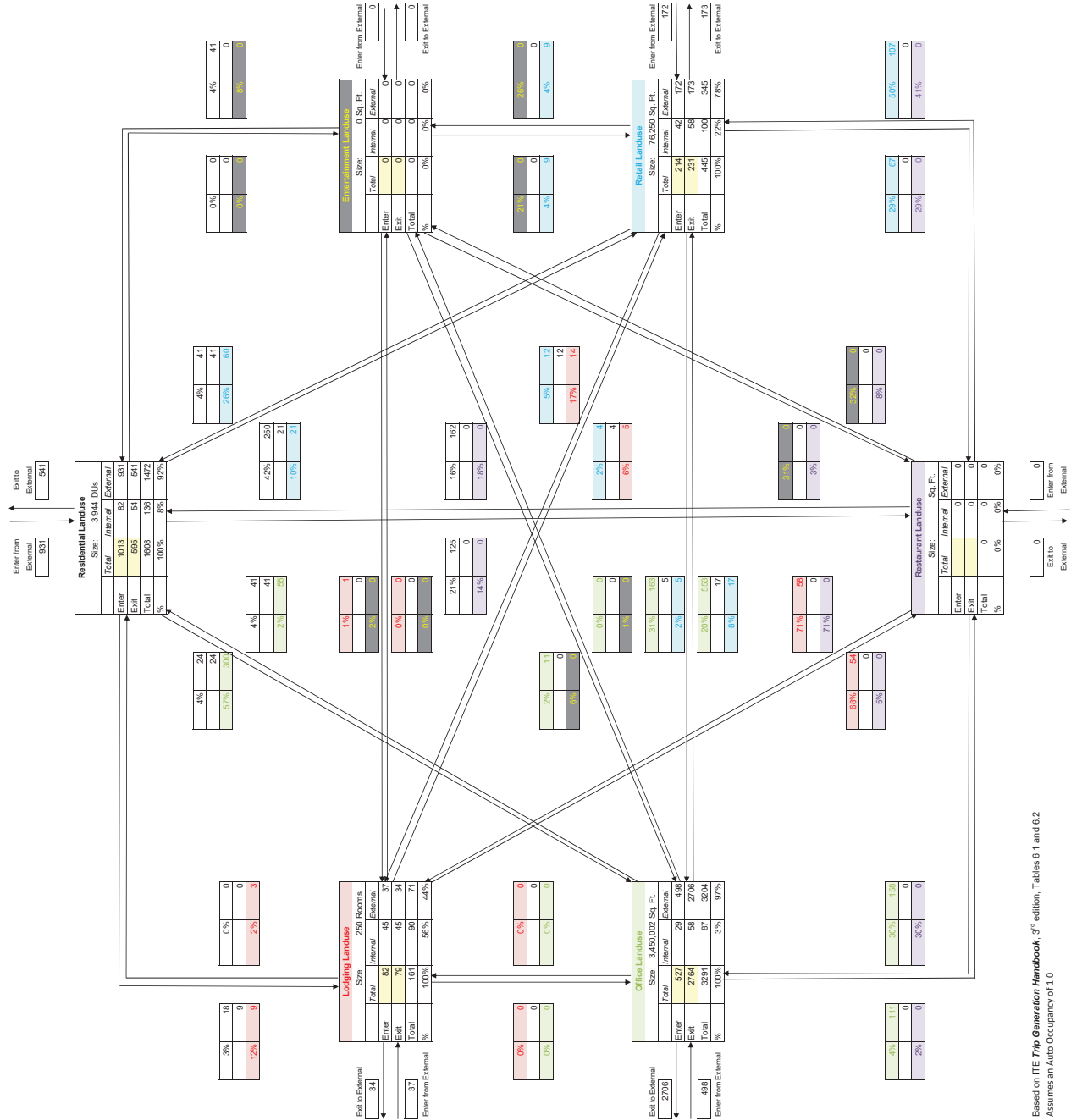
Based on ITE Trip Generation Handbook, 3rd edition, Tables 6.1 and 6.2  
Assumes an Auto Occupancy of 1.0

PM Peak Hour  
Scenario B Trip Generation Estimates  
Internal Capture Matrix



Based on ITE *Trip Generation Handbook*, 3<sup>rd</sup> edition, Tables 6.1 and 6.2  
Assumes an Auto Occupancy of 1.0

PM Peak Hour  
Scenario C Trip Generation Estimates  
Internal Capture Matrix



Based on ITE Trip Generation Handbook, 3<sup>rd</sup> edition, Tables 6.1 and 6.2  
Assumes an Auto Occupancy of 1.0