



**PROPOSED SMALL-SCALE  
FUTURE LAND USE MAP (FLUM) AMENDMENT**

**OVERVIEW**

**ORDINANCE: ORD # 2019-602**

**APPLICATION: L-5378-19C-6-2**

**APPLICANT: STEVE DIEBENOW, ESQ**

**PROPERTY LOCATION: 7 Bird Road**

**Acreage: 1.48**

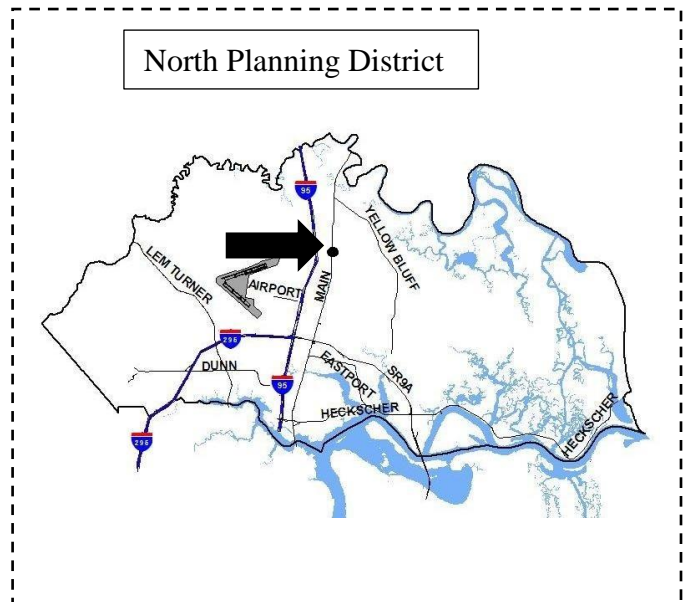
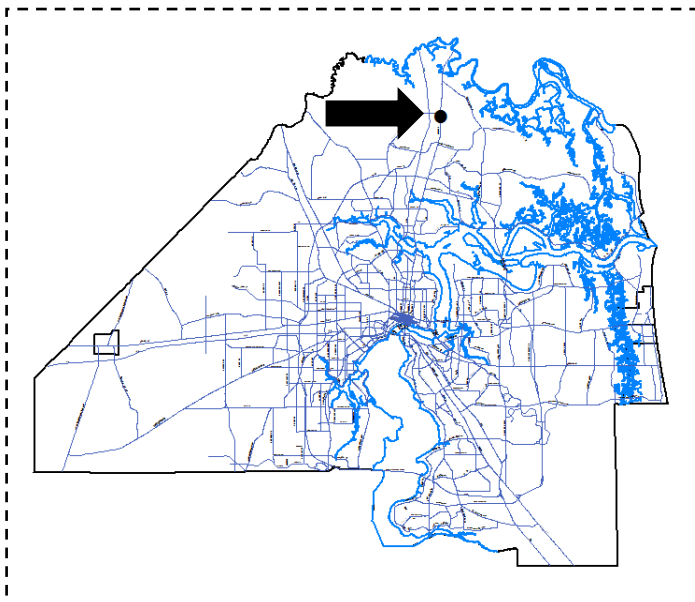
**Requested Action:**

	<b>Current</b>	<b>Proposed</b>
<b>LAND USE</b>	<b>LDR</b>	<b>CGC</b>
<b>ZONING</b>	<b>RLD-120</b>	<b>CCG-2</b>

Existing FLUM Category	Proposed FLUM Category	Existing Maximum Density (DU/Acre)	Proposed Maximum Density (DU/Acre)	Existing Maximum Intensity (FAR)	Proposed Maximum Intensity (FAR)	Net Increase or Decrease in Maximum Density	Non-Residential Net Increase or Decrease in Potential Floor Area
LDR	CGC	7 DU (5 DU/Acre)	N/A	N/A	22,564 sq. ft. (0.35 FAR)	Decrease 7 DU	Increase 22,564 sq. ft.

**PLANNING AND DEVELOPMENT DEPARTMENT’S RECOMMENDATION: APPROVAL**

**LOCATION MAPS:**



# DUAL MAP PAGE

## SMALL SCALE LAND USE APPLICATION L5378-19C



**Existing FLUM Land Use Categories:** Low Density Residential (LDR)

**Requested FLUM Land Use Category:** Community/General Commercial (CGC)



**Current Zoning District(s):** Residential Low Density-120 (RLD-120)

**Requested Zoning District(s):** Commercial Community General-2 (CCG-2)

# ANALYSIS

## Background:

The 1.48 acre amendment site is the eastern portion of a larger 2.6 acre parcel located at the northeast corner of the intersection of North Main Street (SR 5) (US 17) and Bird Road, a local roadway. The property is located in Planning District 6 and Council District 2. According to the Development Area Map in the Future Land Use Element, the site is located within the Suburban Development Area.

The applicant proposes a small-scale future land use map amendment from Low Density Residential (LDR) to Community/ General Commercial (CGC) and a rezoning from Residential Low Density-120 (RLD-120) to Commercial Community/ General-2 (CCG-2) to allow the owner to eliminate the split zoning and land use in order to permit commercial redevelopment of the property. The companion rezoning is pending concurrently with this land use amendment application pursuant to Ordinance 2019-603.

The western portion of the overall parcel is located on North Main Street (SR 5) (US 17), a principal arterial roadway. The site has southern frontage on a local roadway, Bird Road. The subject property contains two dilapidated structures. Single-family homes and mobile homes are located to the south and east of the site along Bird Road. North Main Street (SR 5) (US 17) and a railroad line lie to the west. Large vacant light industrial parcels are located to the west of the railroad tracks. To the north is a residential building.

There have been seven (7) similar proximate land use and zoning changes within 1 mile of the subject site. Ordinances 2006-203-E, 2008-143-E, 2009-0140-E, 2015-437-E, 2017-490-E, 2017-554-E and 2019-0154-E underwent land use amendments from LDR to CGC in order to eliminate the split land use and provide viable depth from Main Street to develop commercial uses. See Attachment E.

The Dual Map on page 2 and Attachment A – Land Utilization Map provide a detailed picture of the existing development pattern for the immediate area.

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

Adjacent Property	Land Use	Zoning District	Current Use(s)
North	LDR	RLD-120	Commercial business
South	CGC	PUD	Single family home
East	LDR	RLD-120	Mobile home
West	CGC	CCG-2	Non- residential structure

The proposed amendment does not include a residential component. Therefore, school capacity issues will not be negatively impacted.

## 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.

### **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 the purpose of 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 availability letter provided with the companion rezoning application, dated April 10, 2019, states that electric service and potable water are available at the site. An existing sewer force main is located within the North Main Street ROW (SR 5) (US 17). The site owner is planning on connecting to centralized water and sewer services.

Infrastructure Element  
Sanitary Sewer Sub-Element

Policy 1.2.6 Within the Suburban Boundary Map as defined in the Future Land Use and Capital Improvements Elements, new septic tanks will be forbidden pursuant to the Septic Environmental Protection Board – Rule 3; however, they may be permitted as interim facilities, provided the following requirements are satisfied:

1. Single family/commercial (estimated flows of 600 gpd or less):
  - a) Requirements of Chapter 64E-6, Florida Administrative Code (F.A.C.) are accommodated.
  - b) The collection system of a regional utility company is not available through gravity service via a facility within a right-of-way or easement which abuts the property.
2. Commercial (above 600 gpd):
  - a) Requirements of Chapter 64E-6, F.A.C. are accommodated.
  - b) The collection system of a regional utility company is not within 50 feet of the property.
3. Subdivision (commercial or single family):
  - a) Requirements of Chapter 64E-6, F.A.C. are accommodated.
  - b) The collection system of a regional utility company is greater than 1/4 mile from the proposed subdivision.
  - c) Each lot is a minimum of 1 acre unsubmerged property.
  - d) Alternative (mounded) systems are not required.

### **Transportation**

The Planning and Development Department completed a transportation analysis (see Attachment B) and determined that the proposed amendment has the potential to result in an increase of 913 new net daily external trips. This analysis is based upon the comparison of what potentially could be built on that site (as detailed in FLUE Policy 1.2.16 Development City of Jacksonville

Standards for Impact Assessment) 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.

#### Supplemental Transportation 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 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 3.

Existing available roadway capacity for the vehicle/truck mode for the entire zone was tested based on volume demand to capacity ratio (V/C), where the average daily traffic volumes determined from the most recent City of Jacksonville traffic count data were compared to the Maximum Service Volumes (MSV) from the current FDOT Quality/Level of Service Handbook

(2012) for each functionally classified roadway within the zone. A V/C ratio of 1.0 indicates the roadway network is operating at its capacity.

The result of the V/C ratio analysis for the overall Mobility Zone 3 is 0.51.

The proposed land use amendment based on impact assessment standards has the development potential of 22,564 SF of commercial space and generating approximately 979 daily vehicular trips onto the roadway network. Subject site is accessible via Bird Road, a 2-lane local roadway and intersects with Main Street (US 17). US 17 is the first functional classified roadway that could be impacted by the proposed development and will be subject to FDOT review and access management requirements.

### **Airport Environment Zone**

The site is located within the 150-foot Airport Height and Hazard Restriction Zone for Jacksonville International Airport. Zoning will limit development to a maximum height of less than 150', 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.

### **Archaeological Sensitivity**

According to the Duval County Preliminary Site Sensitivity Map, the subject property is located within an area of low sensitivity for the presence of archaeological resources. 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.

**IMPACT ASSESSMENT**

**APPLICATION L-5378-19C**

<b>DEVELOPMENT ANALYSIS</b>		
Development Boundary	Suburban	
Roadway Frontage Classification	Principal (US 17)	
Plans/Studies	North Vision Plan. Main & Dunn Corridor Study	
	<b>CURRENT</b>	<b>PROPOSED</b>
Site Utilization	Vacant	Commercial
Land Use/Zoning	LDR/RLD-120	CGC/CCG-2
Development Standards For Impact Assessment	5 DU per acre	0.35 FAR
Development Potential	7 DU	22,564 sq. ft.
Population Potential	18 people	N/A
<b>SPECIAL DESIGNATIONS AREAS</b>		
	<b>YES</b>	<b>NO</b>
Aquatic Preserve		X
Septic Tank Failure Area		X
Airport Environ Zone	X-150 ft.	
Industrial Preservation Area		X
Cultural Resources		X
Archaeological Sensitivity	X -Low	
Historic District		X
Coastal High Hazard/Adaptation Action Areas		X
Ground Water Aquifer Recharge Area		X Discharge
Well Head Protection Zone		X
Boat Facility Siting Zone		X
Brownfield		X
State Road (SR)	SR Name:	
<b>PUBLIC FACILITIES</b>		
Potential Roadway Impact	Increase of 913 net new daily trips	
Potential Public School Impact	N/A	
Water Provider	JEA	
Potential Water Impact	Decrease 1,862 gpd	
Sewer Provider	JEA	
Potential Sewer Impact	Decrease 1,397 gpd	
Potential Solid Waste Impact	Increase of 17.6 tons per year	
Drainage Basin / Sub-Basin	Broward River/Seaton Creek	
Recreation and Parks	Seaton Creek Historic Preserve	
Mass Transit	None	
<b>NATURAL FEATURES</b>		
Elevations	35 ft.	
Land Cover	1100 Residential low density	
Soils	32- Leon fine sand	
Floodzone	No	
Wetlands	No	
Wildlife (sites greater than 50 acres)	N/A	

## PROCEDURAL COMPLIANCE

Upon site inspection by the Planning and Development Department on August 27, 2019, the required notice of public hearing sign was posted. Sixteen (16) notices were mailed out to adjoining property owners and other interested parties informing them of the proposed land use change and pertinent public hearing and meeting dates.



The Citizen Information Meeting was held on September 11, 2019 and no speakers were present.

## CONSISTENCY EVALUATION

### 2030 Comprehensive Plan

Proposed amendment analysis in relation to the Goal, Objectives, and Policies of the 2030 Comprehensive Plan:

#### Future Land Use Element:

- Objective 1.1 Ensure that the type, rate and distribution of growth in the City results in compact and compatible land use patterns, an increasingly efficient urban service delivery system and discourages the proliferation of urban sprawl through implementation of regulatory programs, intergovernmental coordination mechanisms, and public/private coordination
- Policy 1.1.10 Gradual transition of densities and intensities between land uses in conformance with the provisions of this element shall be achieved through zoning and development review process.
- 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.

- Objective 3.2 Continue to promote and sustain the viability of existing and emerging commercial and industrial areas in order to achieve an integrated land use fabric which will offer a full range of employment, shopping, and leisure opportunities to support the City's residential areas.
- Policy 3.2.1 The City shall promote development of commercial and light/service industrial uses in the form of nodes, corridor development, centers or parks.
- 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.
- Objective 6.3 The City shall accommodate growth in Jacksonville by encouraging and facilitating new infill development and redevelopment on vacant, bypassed and underutilized land within areas that already have infrastructure, utilities, and public facilities, while addressing the needs of City residents.

According to the Category Description of the Future Land Use Element (FLUE), Low Density Residential (LDR) in the Suburban Area is intended to provide for low density residential development. Principal uses include single family and multi-family dwellings; and commercial retail sales and service establishments when incorporated into mixed use developments which utilize the Traditional Neighborhood Development (TND) concept. LDR also permits housing densities of up to 7 dwelling units per acre when full urban services are available.

Future land use amendment requests for new Community/ General Commercial (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 are 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. Commercial retail sales and service, filling stations, and business and professional offices are some primary uses allowed within CGC.

North Main Street is a major arterial highway, and the existing land use and zoning designations along this portion of the highway have a commercial development trend. The proposed land use amendment would expand the existing CGC area to make the property more practical for commercial redevelopment as the 150 foot depth of the existing CGC land use designation limits the viable development area for the property. The land use change helps develop the commercial character of the area consistent with the North Jacksonville Vision Plan and is consistent with FLUE Objective 1.1 and 3.2.1 as it supports the development of a non-residential project in the North Planning District along this commercial corridor.

Plan amendment requests for new CGC designations are preferred in locations which are supplied with full urban services and which abut a roadway classified as an arterial or higher on the Functional Highway Classification Map. The overall project will include the western portion of the parcel already in CGC. Primary access to the site will be from Main Street North, a principal arterial roadway and Bird Road, a local roadway. However, Bird Road is a dead-end street, and traffic will not be flowing through adjacent residential neighborhoods. There are a large number of residential properties within walking distance of the proposed amendment. Therefore, the proposed amendment is consistent with the CGC Future Land Use Category preference for new designations and FLUE Policies 1.1.10, 3.2.1 and 3.2.4.

The site is vacant and contains a few dilapidated structures on both the amendment site as well as the western portion of the parcel currently in CGC. The site would provide infill development along the eastern side of Main Street North, which is an existing area for commercial development. The amendment to CGC would result in compatible land use patterns for the area and encourage the use of an underutilized property. This is consistent with FLUE Objective 3.2 and Objective 6.3.

Pursuant to FLUE Policy 1.2.9, the site will be served by centralized water and wastewater. The applicant has provided a JEA availability letter for the property, dated April 10, 2019 stating that the site has the ability to connect to the existing water connection through the front parcel. There is a sewer connection point located within the Main Street ROW (US-17) (SR-5).

### **Corridor Plan Consistency**

The amendment site is within the study area of the *North Jacksonville – Dunn Ave. & Main St. Corridor Revitalization Plan*. The site is located within District # 8 (Pecan Park District) of the Main Street segment of the plan. The plan states that this district serves as a transition between urbanizing districts to the south and more rural areas to the north. The plan calls for the intersection of Pecan Park Road and North Main Street (SR 5) (US 17) to become a node for place-making development. The site is 0.4 of a mile to the south of the intersection. The land use amendment is consistent with the intent of the corridor plan.

### **Vision Plan Consistency**

The site is also within the boundary of the *North Jacksonville Vision Plan*. Best practices for corridor redevelopment, as stated in the plan, are a response to the desires of the residents of North Jacksonville for a better community image and to be served by higher quality retail and commercial services, without having to drive great distances. This amendment is consistent with the plan as it is creating new commercial services within short driving or walking distance of local residents.

### **Strategic Regional Policy Plan**

The proposed amendment is consistent with the following Goal of the Strategic Regional Policy Plan:

Goal 2.3      An environment that is conducive to the creation and relocation of new businesses as well as the expansion of existing businesses in the northeast Florida region.

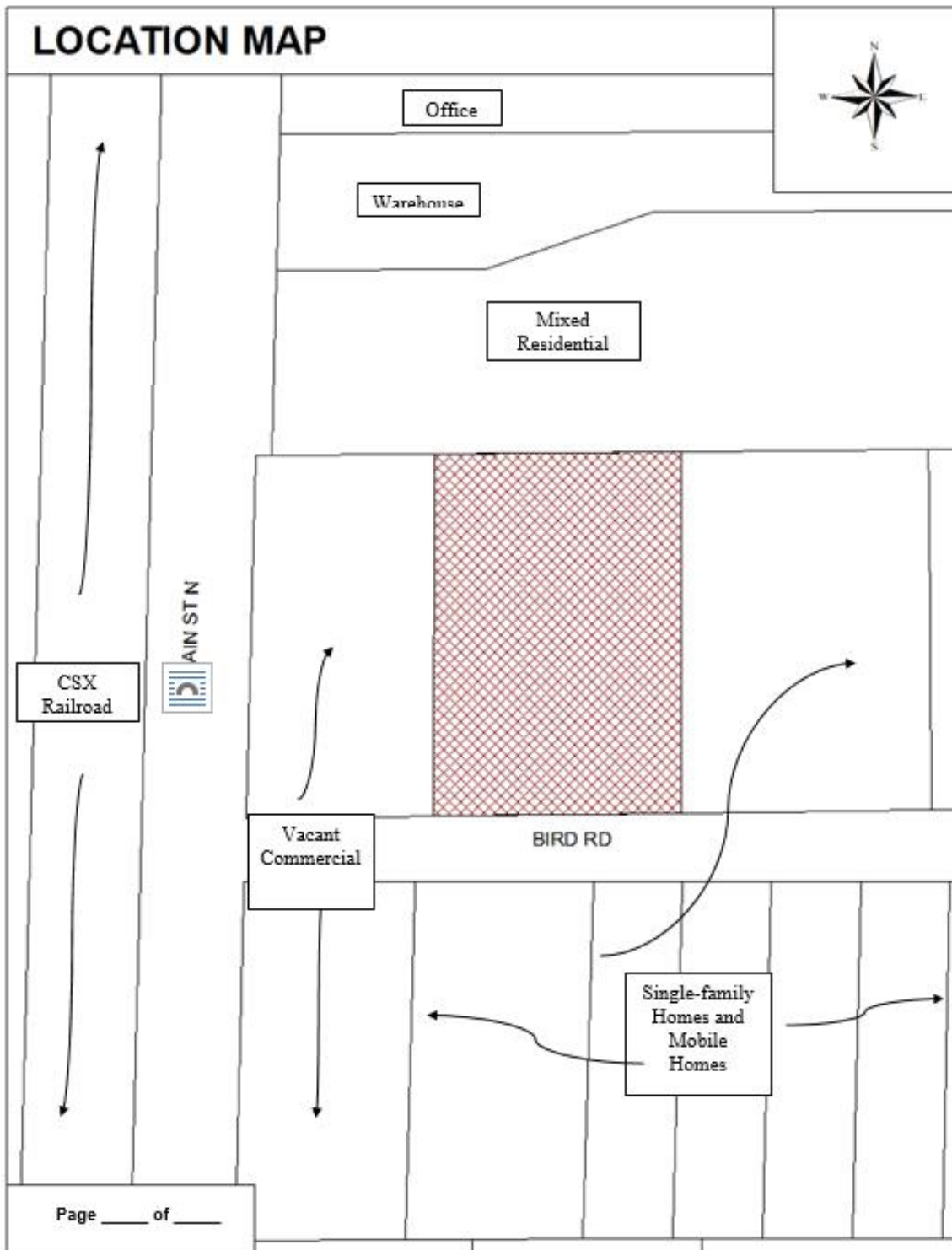
The proposed land use amendment is consistent with Policy 2.3 of the Northeast Florida Regional Council's Strategic Regional Policy Plan, as it would provide an additional location for the creation of new business opportunities in the northeast Florida region.

## **RECOMMENDATION**

The Planning and Development Department recommends **APPROVAL** of this application based on its consistency with the 2030 Comprehensive Plan and the Strategic Regional Plan.

# ATTACHMENT A

## Existing Land Utilization:



## ATTACHMENT B

### Transportation Review:

A trip generation analysis was conducted for Land Use Amendment L-5378-19C, located at the intersection of Bird Road and Main Street, and south of Pecan Park Road in the Suburban Development Area of Jacksonville, Florida. The subject site has an existing Low Density Residential (LDR) land use category. The proposed land use amendment is to allow for Community General Commercial (CGC) on approximately 1.48 +/- acres.

Transportation Element Policy 1.2.1 of the 2030 Comprehensive Plan requires the use of the most current ITE Trip Generation Manual (10<sup>th</sup> Edition) to calculate the vehicular trips based on the maximum development potential for existing and proposed land uses. In accordance with development standards for impact assessments established in the Future Land Use Element Policy 1.2.16, the existing LDR land use category development impact assessment standard is 5-single family dwelling units per acre, resulting in a development potential of 7 homes (ITE Land Use Code 210), generating 66 new daily vehicular trips. The proposed the CGC land use category development impact assessment standards result in a development potential of 22,564 SF of commercial space (ITE Land Use Code 820), generating 979 new daily vehicular trips. This will result in 913 net new daily vehicular trips if the land use is amended to allow for CGC development, as shown in Table A.

<b>Table A</b>						
<b>Trip Generation Estimation</b>						
Current Land Use	ITE Land Use Code	Potential Number of Units (X)	Estimation Method (Rate or Equation)	Gross Trips	Less Pass-By Trips	Net New Daily Trip Ends
LDR	210	7 SF Dus	T = 9.44 (X)	66	0.00%	66
					<b>Total Section 1</b>	<b>66</b>
Proposed Land Use	ITE Land Use Code	Potential Number of Units (X)	Estimation Method (Rate or Equation)	Gross Trips PM/Daily	Less Pass-By Trips	Net New Daily Trip Ends
CGC	820	22,564 SF	T = 84.46 (X) / 1000	1,906	48.62%	979
					<b>Total Section 2</b>	<b>979</b>
					<b>Net New Daily Trips</b>	<b>913</b>

*Source: Trip Generation Manual, 10th Edition, Institute of Engineers*

## ATTACHMENT B(cont)

### **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.

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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 3.


Existing available roadway capacity for the vehicle/truck mode for the entire zone was tested based on volume demand to capacity ratio (V/C), where the average daily traffic volumes determined from the most recent City of Jacksonville traffic count data were compared to the *Maximum Service Volumes (MSV)* from the current *FDOT Quality/Level of Service Handbook (2012)* for each functionally classified roadway within the zone. A V/C ratio of 1.0 indicates the roadway network is operating at its capacity.

The result of the V/C ratio analysis for the overall Mobility Zone 3 is **0.51**.

The proposed land use amendment based on impact assessment standards has the development potential of 22,564 SF of commercial space and generating approximately 979 daily vehicular trips onto the roadway network. Subject site is accessible via Bird Road, a 2-lane local roadway and intersects with Main Street (US 17). US 17 is the first functional classified roadway that could be impacted by the proposed development and will be subject to FDOT review and access management requirements.

# ATTACHMENT C

## Land Use Amendment Application:

 APPLICATION FOR SMALL-SCALE LAND USE AMENDMENT TO THE FUTURE LAND USE MAP SERIES - 2030 COMPREHENSIVE PLAN			
Date Submitted:	4/9/19	Date Staff Report is Available to Public:	9-13-19
Land Use Adoption Ordinance #:	2019-602	Planning Commission's LPA Public Hearing:	9-19-19
Rezoning Ordinance #:	2019-803	1st City Council Public Hearing:	9-24-19
JPDD Application #:	L-5378-19C	LUZ Committee's Public Hearing:	10-1-19
Assigned Planner:	Jody McDaniel	2nd City Council Public Hearing:	10-8-19

**GENERAL INFORMATION ON APPLICANT & OWNER**

<b>Applicant Information:</b> STEVE DIEBENOW, ESQ  ONE INDEPENDENT DRIVE, STE. 1200 JACKSONVILLE, FL 32202 Ph: 9043011269 Fax: 9043011279 Email: SDIEBENOW@DMPHLAW.COM	<b>Owner Information:</b> DUNN JAX LLC  8650-12 OLD KINGS ROAD SOUTH JACKSONVILLE, FL 32217
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**DESCRIPTION OF PROPERTY**

<b>Acreage:</b> 1.48 <b>Real Estate #(s):</b> 108348 0000	<b>General Location:</b> NORTHEAST CORNER OF MAIN ST N AND BIRD RD
<b>Planning District:</b> 6 <b>Council District:</b> 2 <b>Development Area:</b> <b>Between Streets/Major Features:</b> MAIN STREET N and N/A	<b>Address:</b> 7 BIRD AVE

**LAND USE AMENDMENT REQUEST INFORMATION**

**Current Utilization of Property:** VACANT  
**Current Land Use Category/Categories and Acreage:**  
LDR 1.48

**Requested Land Use Category:** CGC  
**Surrounding Land Use Categories:** CGC,LDR

**Applicant's Justification for Land Use Amendment:**  
  
TO ELIMINATE THE SPLIT USE AND ZONING ON THE PARCEL TO PERMIT REDEVELOPMENT OF THE PROPERTY.

**UTILITIES**

<b>Potable Water:</b> JEA	<b>Sanitary Sewer:</b> JEA
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**COMPANION REZONING REQUEST INFORMATION**

**Current Zoning District(s) and Acreage:**  
RLD-120 1.48

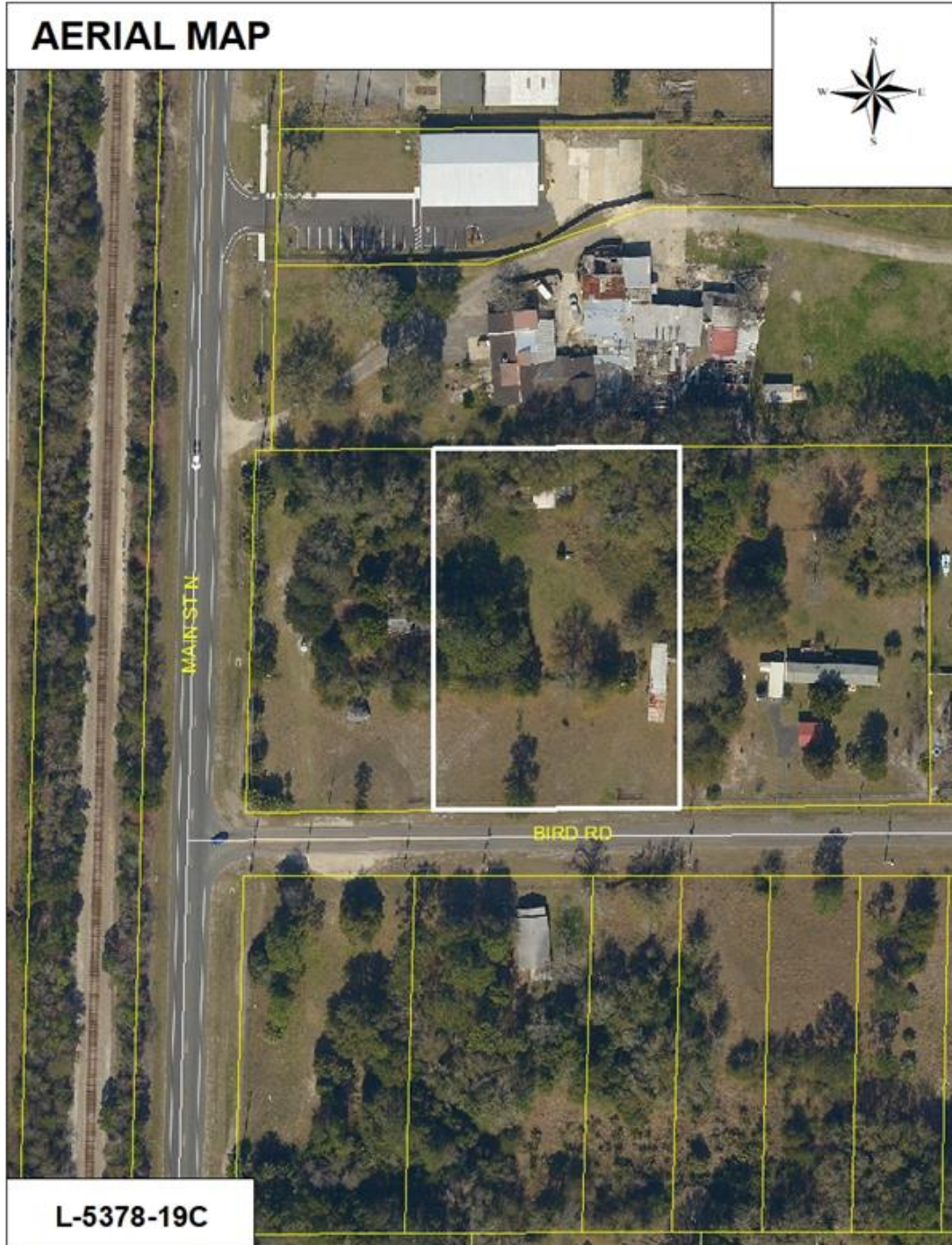
**Requested Zoning District:** CCG-2

Additional information is available at 904-255-7888 or on the web at <http://maps.coj.net/luzap/>



# ATTACHMENT D

Aerial:





# ATTACHMENT E

## Land Use Changes from LDR to CGC

