

Report of the Jacksonville Planning and Development Department

Small-Scale Future Land Use Map Amendment – July 31, 2020

**Ordinance/Application No.:** 2020-332 / L-5428-20C

**Property Location:** 1541 and 1551 Riverside Avenue; 1715 and 1721 Memorial Park Drive; and 1729 Memorial Park Terrace

**Real Estate Number(s):** 090180-0000; 090181-0000; 090182-0000; 090183-0000; and 090188-0000

**Property Acreage:** 1.26 Acres

**Planning District:** District 1, Urban Core

**City Council District:** District 14

**Applicant:** Paul Harden, Esq.

**Current Land Use:** Residential-Professional-Institutional (RPI)

**Proposed Land Use:** Neighborhood Commercial (NC)

**Development Area:** Urban Priority Area

**Current Zoning:** Commercial Residential Office (CRO)

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

***RECOMMENDATION: APPROVE***

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

The land use amendment allows for infill use of existing structures consistent with the NC category and Riverside/Avondale Overlay.

**BACKGROUND**

The 1.26 acre subject site is located on the east side of Riverside Avenue, which is classified as a minor arterial road, just north of Memorial Park at Memorial Park Drive. The site consists of five (5) parcels, four (4) front the corner where Memorial Park Drive meets Riverside Avenue and the last sits to the southeast, fronting Memorial Park Terrace.

The applicant seeks an amendment to the Future Land Use Map series (FLUMs) of the Future Land Use Element (FLUE) of the 2030 Comprehensive Plan from RPI to NC in order to redevelop the site with neighborhood commercial uses. The site currently contains medical office buildings and a multi-family property. The site sits amongst other parcels designated as RPI and just north of a high-rise residential property, designated as High Density Residential (HDR), and east of Memorial Park, designated as Recreation and Open Space (ROS). A companion rezoning application is pending concurrently with the land use application via Ordinance 2020-333, which seeks to change the zoning district from CRO to PUD.

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

North: Land Use: RPI  
Zoning: PUD / CRO  
Property Use: bed and breakfast and residential

South: Land Use: RPI / HDR  
Zoning: CRO / Residential High Density-B (RHD-B)  
Property Use: office / multifamily

East: Land Use: RPI  
Zoning: CRO  
Property Use: offices and residential

West: Land Use: RPI / ROS  
Zoning: CRO / Public Buildings and Facilities-1 (PBF-1)  
Property Use: multifamily and city park

**IMPACT ASSESSMENT**

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

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

## Land Use Amendment Impact Assessment

<b>Development Analysis</b>		
Development Boundary	Urban Priority Area	
Roadway Frontage Classification / State Road	Riverside Avenue (minor arterial) / Memorial Park Drive (local)	
Plans and/or Studies	Urban Core Vision Plan	
Site Utilization	Current: medical offices	Proposed: NC uses
Land Use / Zoning	Current: RPI / CRO	Proposed: NC / PUD
Development Standards for Impact Assessment	<u>Current</u> Scenario 1: 0.5 FAR Scenario 2: 90% Residential at 30 DU/Acre and 10% Non-residential at 0.5 FAR	<u>Proposed</u> Scenario 1: 0.45 FAR Scenario 2: 90% Residential at 30 DU/Acre and 10% Non-residential at 0.45 FAR
Development Potential	<u>Current</u> Scenario 1: 27,442 Sq. Ft. Scenario 2: 34 DUs and 2,744 Sq. Ft.	<u>Proposed</u> Scenario 1: 24,698 Sq. Ft. Scenario 2: 34 DUs and 2,469 Sq. Ft.
Net Increase or Decrease in Maximum Density	None	
Net Increase or Decrease in Potential Floor Area	Scenario 1: Decrease of 2,744 Sq. Ft. Scenario 2: Decrease of 275 Sq. Ft.	
Population Potential	<u>Current</u> Scenario 1: Not applicable Scenario 2: 79 people	<u>Proposed</u> Scenario 1: Not applicable Scenario 2: 79 people
<b>Special Designation Areas</b>		
Aquatic Preserve	No	
Septic Tank Failure Area	No	
Airport Environment Zone	300 feet height and hazard zone for NAS JAX	
Industrial Preservation Area	No	
Cultural Resources	Florida Master Site File – Historic Structures; and Duval – National Historic Register Listed	
Archaeological Sensitivity	Low and High	
Historic District	Riverside-Avondale Historic District	
Coastal High Hazard/Adaptation Action Area	No	
Groundwater Aquifer Recharge Area	No – discharge	
Wellhead Protection Zone	No	
Boat Facility Siting Zone	No	
Brownfield	Brownfields Study Area	
<b>Public Facilities</b>		
Potential Roadway Impact	Scenario 1: Increase of 198 net new trips Scenario 2: Increase of 74 net new trips	
Potential Public School Impact	Scenario 1: Not applicable Scenario 2: Increase of 14 students	
Water Provider	JEA	
Potential Water Impact	Scenario 1: Decrease of 690.85 GPD Scenario 2: Decrease of 69.11 GPD	
Sewer Provider	JEA	
Potential Sewer Impact	Scenario 1: Decrease of 518.14 GPD Scenario 2: Decrease of 51.83 GPD	
Potential Solid Waste Impact	Scenario 1: Decrease of 4.39 tons per year Scenario 2: Decrease of 0.44 tons per year	
Drainage Basin/Sub-basin	Upstream of Trout River / St. Johns River	

<b>Development Analysis</b>	
Recreation and Parks	Memorial Park and Riverside Park
Mass Transit Access	Route 16
<b>Natural Features</b>	
Elevations	5 feet
Land Cover	1400: Commercial and services
Soils	(69) Urban Land
Flood Zones	0.2% Annual Chance Flood Hazard (0.64 of an acre)
Wetlands	None
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 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).

The land use application indicates that JEA will provide water and sewer for the site. JEA provided a memo, dated July 3, 2020, stating that water and sewer mains are available for connection near the subject site, consistent with FLUE Policy 1.2.9, and final connection points will be determined during the service availability review.

### Transportation

The Planning and Development Department completed a transportation analysis, which is on file with the Planning and Development Department, and determined that the proposed amendment from RPI to NC has the development potential under scenario 1 as 100 percent non-residential and under scenario 2 as 90 percent residential with 10 percent non-residential uses. If the land use is amended to NC, development could result in an increase of 198 net new trips under scenario 1 or 74 under scenario 2. This analysis is based upon the comparison of what potentially could be built on that site versus the maximum development potential. Trips generated by the new development will be processed through the Concurrency and Mobility Management System Office.

#### Transportation Element

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

#### Capital Improvements Element

Policy 1.6.1 Upon adoption of the Mobility Plan implementing ordinance, the City shall cease transportation concurrency and use a quantitative formula for purposes of assessing a landowner's mobility fee for transportation impacts generated from a proposed development, where the landowner's mobility fee shall equal the cost per vehicle miles traveled

(A); multiplied by the average vehicle miles traveled per Development Area (B); multiplied by the daily trips (C); subtracted by any trip reduction adjustments assessed to the development.

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

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

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

Mobility needs vary throughout the city and in order to quantify these needs, the city was divided into 10 Mobility Zones. The Mobility Strategy Plan identifies specific transportation strategies and improvements to address traffic congestion and mobility needs for each mode of transportation. The project site is located in Mobility Zone 7.

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 7 is 0.66.

The subject site is accessible via Riverside Avenue (SR 211), an urbanized 2-lane divided arterial facility and is subject to Florida Department of Transportation (FDOT) review and access management requirements.

### **School Capacity**

The Planning and Development Department determined that the proposed amendment from RPI to NC has the development potential under scenario 1 as 100% non-residential and under scenario 2 as 90% residential with 10% non-residential uses. Under scenario 2, the proposed amendment could result in development of 34 multi-family dwelling units.

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

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

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

- Elementary School
  - Concurrency Service Area (CSA) 2
  - 2019/2020 enrollment: 6,397
  - Current utilization: 78%
  - New student development from amendment: 7
  - 5-year utilization: 76%
  - Available seats in CSA 2: 1,799
  - Available seats in adjacent CSA(s): 1 and 8 is 7,652
  
- Middle School
  - CSA 2
  - 2019/2020 enrollment: 2,605
  - Current utilization: 69%
  - New student development from amendment: 3
  - 5-year utilization: 82%
  - Available seats in CSA 2: 188
  - Available seats in adjacent CSA(s): 1 and 7 is 464
  
- High School
  - CSA 2
  - 2019/2020 enrollment: 3,232
  - Current utilization: 80%
  - New student development from amendment: 4
  - 5-year utilization: 88%
  - Available seats in CSA 2: 688
  - Available seats in adjacent CSA(s): 1 and 8 is 3,437

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

### Public School Facilities Element

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

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

### Supplemental School Information

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

- West Riverside Elementary School
  - CSA 2
  - Amendment student generation: 7
  - School Capacity including permanent spaces and portables: 420
  - Current enrollment 20 day county for 2019/2020: 318
  - Percent Occupied: 76%
  - 4-year projection: 75%
  
- Lake Shore Middle School
  - CSA 2
  - Amendment student generation: 3
  - School Capacity including permanent spaces and portables: 1,328
  - Current enrollment 20 day county for 2019/2020: 967
  - Percent Occupied: 73%
  - 4-year projection: 77%
  
- Robert E. Lee High School
  - CSA 2
  - Amendment student generation: 4
  - School Capacity including permanent spaces and portables: 1,844
  - Current enrollment 20 day county for 2019/2020: 1,708
  - Percent Occupied: 93%
  - 4-year projection: 99%

### **Archaeological Sensitivity and Cultural and Historic Resources**

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.

The subject site is located in the Riverside Avondale Historic District and as such, development is subject to review per Chapter 307.106 for Certificates of Appropriateness (COA) for exterior alterations, additions, demolitions, and changes to the site and property. Staff from the City's Historic Preservation Section reviewed the application (memo on file with the Planning and Development Department) and found that two of the parcels (1721 Memorial Park Drive and 1541 Riverside Avenue) are listed as contributing to the historic district; the remaining parcels are non-contributing. Contributing structures are held to the highest standard for renovation and demolition. Non-contributing structures are held to the standards for COA review but are not reviewed for full demolition.

#### **Brownfield Area**

The property is located within the Downtown Brownfield Pilot Area. The City of Jacksonville designated properties in the downtown area as a Pilot Program Brownfield Area by City Council Resolution Number 2000-125-A. The property owner may request the property be designated as a Brownfield Site. A Brownfield Site is property where the expansion, redevelopment, or reuse of the property may be complicated by the presence or potential presence of a hazardous substance, pollutant or contaminant. The property owner may qualify for tax credits.

#### **Airport Environment Zone**

The site is located within the 300-foot Height and Hazard Zone for the Naval Air Station Jacksonville (NAS JAX). Zoning will limit development to a maximum height of less than 300 feet, 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.



## **Flood Zones**

Approximately 0.64 of an acre of the subject site is within the 0.2% Annual Chance Flood Hazard flood zone. Flood zone designations are assigned by the Federal Emergency Management Agency (FEMA). FEMA defines the various flooding characteristics of different lands based on a 100-year storm. The 100-year storm or Special Flood Hazard Area (SFHA) refers to a flood occurring from a storm event that happens an average of every 100 years. This does not mean that a storm of this type will happen every 100-years. There is a 1-percent chance that a storm of this magnitude will occur in any given year.

The 0.2% Annual Chance Flood Hazard flood zone is defined as areas within the 500-year floodplain and outside of the SFHA. Flood insurance is not mandatory within these flood zones. The areas are deemed to be subject to moderate flood hazards. Any development within the floodplain will be required to comply with Chapter 652, the Floodplain Management Ordinance.

### **Conservation /Coastal Management Element (CCME)**

Policy 1.4.4 The City shall require all development within the 100-year flood plain to be in strict conformance with all applicable federal, State, regional and local development regulations.

Policy 2.7.1 The City shall continue to define the surface hydrology of the area to determine flood plain vulnerability and sensitivity, and will determine appropriate protection measures.

Policy 2.7.3 The City shall protect appropriate floodplain areas for the public benefit and restore degraded floodplain areas by:

- A. Land acquisition or conservation easement acquisition;
- B. Regulation, including setbacks, buffer zones, designated wildlife corridors, low density zoning, performance standards and open space requirements; and
- C. Incentives, including tax benefits and transfer of development rights.

## **PROCEDURAL COMPLIANCE**

Upon site inspection by the Planning and Development Department on July 9, 2020, the required notices of public hearing signs were not posted. The applicant was notified and proof of sign posting was provided on July 16, 2020. One hundred eight-eight (188) notices were mailed out to adjoining property owners informing them of the proposed land use change and pertinent public hearing and meeting dates.

The Citizen Information Meeting was held on July 20, 2020 via a virtual Zoom meeting. Four (4) members of the public and the applicant attended to discuss the proposed amendment. Those who attended were concerned with parking and related traffic issues; vehicular, pedestrian, and cyclist safety; scale of the proposed development; and specifics related to the PUD site plan.

## **CONSISTENCY EVALUATION**

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

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

##### *Development Area*

*Urban Priority Area (UPA):* The UPA is the first tier Development Area and generally includes the historic core of the City and major connecting corridors. The intent of the UPA is to encourage revitalization and the use of existing infrastructure through redevelopment and infill development at urban densities that are highly supportive of transit and result in the reduction of per capita greenhouse gas emissions and vehicle miles traveled. Development is expected to employ urban development characteristics as further described in each land use plan category. The UPA does not include the Central Business District Land Use Category Boundaries.

- 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 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 1.1.12      Promote the use of Planned Unit Developments (PUDs), cluster developments, and other innovative site planning and smart growth techniques in all commercial, industrial and residential plan categories, in order to allow for appropriate combinations of complementary land uses, and innovation in site planning and design, subject to the standards of this element and all applicable local, regional, State and federal regulations.
- 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 1.1.22 Future development orders, development permits and plan amendments shall maintain compact and compatible land use patterns, maintain an increasingly efficient urban service delivery system and discourage urban sprawl as described in the Development Areas and the Plan Category Descriptions of the Operative Provisions.

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.

Policy 3.1.14 The City shall allow a broad mixture of supporting recreational, commercial, public facilities and services in mixed use residential developments utilizing the "Traditional Neighborhood Design" (TND) concept and in Locally Designated Historic Preservation Districts, in accordance with the standards and criteria in the Land Development Regulations without the application of nodal considerations and other location criteria in this 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 3.2.2 The City shall promote, through the Land Development Regulations, infill and redevelopment of existing commercial areas in lieu of permitting new areas to commercialize.

According to the Category Description within the Future Land Use Element (FLUE), RPI in the Urban Priority Area (UPA) is intended to provide compact medium to high density development. Development which includes medium to high density residential and professional office uses is preferred. Limited commercial retail and service establishments which serve a diverse set of neighborhoods are also encouraged in order

to reduce the number of Vehicle Miles Traveled. A combination of compatible uses should be organized vertically within a multistory building.

NC is a category primarily intended to provide commercial retail and service establishments which serve the daily needs of nearby residential neighborhoods. These uses shall generally be located within walking distance of residential neighborhoods in order to reduce the number of Vehicle Miles Traveled. NC designations in the UPA are preferred in locations which are supplied with full urban services; which abut a roadway classified as a collector or higher on the Functional Highway Classification Map; and which are compatible with adjacent residential neighborhoods. Sites with two or more property boundaries on transportation rights-of-way are considered preferred locations.

The subject site is located on Riverside Avenue, which is classified as a minor arterial road, and Memorial Park Drive, a local road, adjacent to Memorial Park in the Riverside-Avondale Historic District. The area has access to full urban services, including centralized water and sewer, mass transit, drainage, and parks and recreation, and a compact, gridded block system typical of the period in which the neighborhood was developed. The subject site is surrounded by a variety of neighborhood-scale uses, including residences, commercial, office, and recreation. The proposed NC designation would be compatible as it allows for the development of low intensity commercial uses to provide daily goods and services to nearby residences. For these reasons, the proposed land use amendment is consistent with FLUE Objective 1.1, Policies 1.1.22 and 3.1.14, and Goal 3.

The proposed amendment facilitates urban infill development and redevelopment which is encouraged within the Urban Priority Area and sustains the viability of this existing commercial node, while protecting the fabric and character of the surrounding area. As such, the proposed land use amendment is consistent with FLUE Objective 3.2 and Policy 3.2.2.

Given the popularity of the Riverside neighborhood and the land development and growth patterns of the area in recent years, the proposed amendment to NC is indicative of a need for low intensity commercial development, particularly given proximate compatible uses, the size and scale of surrounding development, and the City's mobility goals, consistent with FLUE Policies 1.1.5 and 1.1.21.

As previously mentioned, a companion rezoning application is pending concurrently with the land use application, which seeks to change the zoning district from CRO to PUD. The use of a PUD allows for appropriate combinations of complementary land uses and innovation in design consistent with Policy 1.1.12.

### **Vision Plan**

The application site lies within the boundary of the Urban Core Vision Plan. The plan does not identify specific recommendations for the subject site. However, the proposed land use amendment to NC appears to be consistent with Guiding Principles One and Four of

the Plan because it allows for the enhancement of an economic driver (Riverside Avenue corridor) while protecting the uniqueness of the historic Riverside neighborhood.

*Guiding Principle One: Capitalize on the Urban Core's Uniqueness*  
*Guiding Principle Four: Provide for Economic Growth*

**Strategic Regional Policy Plan**

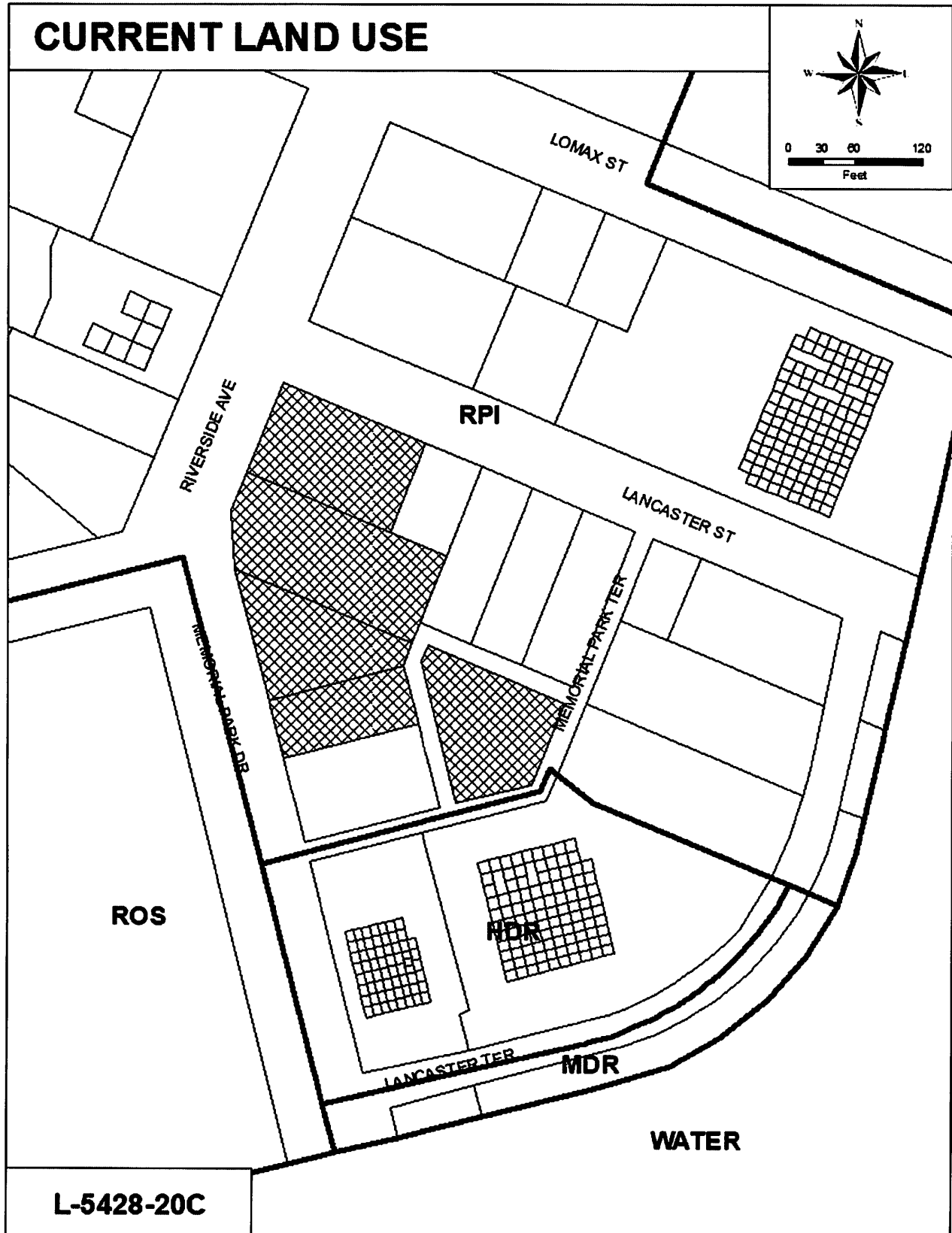
The proposed amendment is consistent with the following Objective and Policy of the Strategic Regional Policy Plan:

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

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

The proposed land use amendment would create opportunities for more low intensity commercial development, maintaining the land development pattern of the Riverside neighborhood and providing for redevelopment of an infill site. Therefore, the proposed amendment is consistent with Policy 3 of the Strategic Regional Policy Plan, Communities and Affordable Housing Element.

**LOCATION AND CURRENT LAND USE MAP**



**FIELD UTILIZATION MAP**

