

*Donna Deegan, Mayor*

City Hall at St. James  
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Jacksonville, FL 32202  
(904) 630-CITY  
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October 5, 2023

The Honorable Ronald B. Salem, Pharm. D., President  
The Honorable Kevin Carrico, LUZ Chair  
And Members of the City Council  
117 West Duval Street  
Jacksonville, Florida 32202

**RE: Planning Commission Advisory Report / Ordinance No. 2023-591/Application No. L-5836-23C**

Dear Honorable Council President Salem, Honorable Council Member and LUZ Chairman Carrico and Honorable Members of the City Council:

Pursuant to the provisions of Section 650.405 *Planning Commission Advisory Recommendation and Public Hearing*, the Planning Commission **APPROVED** Ordinance 2023-591 on October 5, 2023.

P&DD Recommendation                      DENY

PC Issues:                                      One citizen spoke in opposition to the amendment because it represents non-residential intrusion into the residential neighborhood.

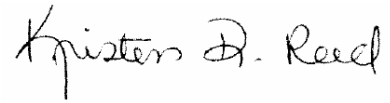
The Planning Commission noted that the proposed private club is a charitable organization that serves the surrounding community, and it is not a commercial business.

**PC Vote:                                      7-0 APPROVE**

Ian Brown, Chair	Aye
Jason Porter, Secretary	Absent
Marshall Adkison	Aye
Daniel Blanchard	Aye
Charles Garrison	Aye
David Hacker	Aye
Morgan Roberts	Aye
Jack Meeks	Aye

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

Sincerely,

A handwritten signature in black ink that reads "Kristen D. Reed". The signature is written in a cursive style with a clear, legible font.

Kristen D. Reed, AICP  
Chief of the Community Planning Division  
City of Jacksonville - Planning and Development Department  
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**Report of the Jacksonville Planning and Development Department**

**Small-Scale Future Land Use Map Amendment – September 29, 2023**

**Ordinance/Application No.:** 2023-591 / L-5836-23C

**Property Location:** 0 Old St. Augustine Road, between Lake Gardens Lane and Caron Drive.

**Real Estate Number(s):** 158290 0020

**Property Acreage:** 1.10 Acres

**Planning District:** District 3, Southeast

**City Council District:** District 6

**Applicant:** Wyman Duggan, Esq.

**Current Land Use:** Low Density Residential (LDR)

**Development Area:** Suburban Development Area

**Proposed Land Use:** Public Buildings and Facilities (PBF)

**Current Zoning:** Residential Low Density-60 (RLD-60)

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

**RECOMMENDATION:** ***DENY***

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

To permit the development of an American Legion Post.

**BACKGROUND**

The 1.10-acre subject site is located at 0 Old St. Augustine Road, between Lake Gardens Lane and Caron Drive. According to the City’s Functional Highways Classification Map, Old St. Augustine Road is classified as a collector roadway.

The subject site includes vacant land surrounded by single-family dwellings. The applicant seeks an amendment to the Future Land Use Map series (FLUMs) of the Future Land Use Element (FLUE) of the 2045 Comprehensive Plan from Low Density Residential (LDR) to Public Buildings and Facilities (PBF) to allow the applicant’s intended use of the property for an American Legion Post. This is an organization which helps military members and their families by providing a location for them to meet and host events. A companion rezoning has been filed and is pending concurrently with the land use

amendment, via Ordinance 2023-592, to change the zoning district of the site from Residential Low Density-60 (RLD-60) to Planned Unit Development (PUD).

The application site is surrounded by LDR on all sides. The adjacent land use categories, zoning districts and property uses of the land use amendment site are as follows:

North: Land Use: Low Density Residential (LDR)  
 Zoning: Residential Low Density-60 (RLD-60), Rural Residential-Acre (RR-Acre), Residential Low Density-80 (RLD-80)  
 Property Use: Single-Family, Undeveloped Land

South: Land Use: LDR  
 Zoning: RLD-60  
 Property Use: Single-Family

East: Land Use: LDR  
 Zoning: RLD-60  
 Property Use: Single-Family, Undeveloped Land

West: Land Use: LDR  
 Zoning: RLD-60  
 Property Use: Single-Family, Undeveloped Land

**IMPACT ASSESSMENT**

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

**Land Use Amendment Impact Assessment - Application Number L-5836-23C**

<b>Development Analysis</b>		
Development Boundary	Suburban Area	
Roadway Frontage Classification / State Road	Collector Roadway	
Plans and/or Studies	Southeast Vision Plan/Mandarin Height Overlay	
Site Utilization	Current: Vacant	Proposed: American Legion Post Organization
Land Use / Zoning	Current: LDR/RLD-60	Proposed: PBF/PUD

<b>Development Analysis</b>		
Development Standards for Impact Assessment	Current: 5 DU/Acre	Proposed: .3 FAR
Development Potential	Current: 5 SF DUs	Proposed: 14,374 sq. ft. institutional
Net Increase or Decrease in Maximum Density	Decrease of 5 SF DUs	
Net Increase or Decrease in Potential Floor Area	Increase of 14,374 sq. ft.	
Population Potential	Current: 13 People	Proposed: N/A
<b>Special Designation Areas</b>		
Aquatic Preserve	No	
Evacuation Zone	No	
Airport Environment Zone	No	
Industrial Preservation Area	No	
Cultural Resources	No	
Archaeological Sensitivity	Low, Medium, and High	
Historic District	No	
Coastal High Hazard	No	
Adaptation Action Area	No	
Groundwater Aquifer Recharge Area	No	
Wellhead Protection Zone	No	
Boat Facility Siting Zone	No	
Brownfield	No	
<b>Public Facilities</b>		
Potential Roadway Impact	278 net new daily trips	
Potential Public School Impact	N/A	
Water Provider	JEA	
Potential Water Impact	Decrease of 321 gpd	
Sewer Provider	JEA	
Potential Sewer Impact	Decrease of 241 gpd	
Potential Solid Waste Impact	Increase of 9.9 tpy	
Drainage Basin/Sub-basin	Julington Creek/ Julington Creek	
Recreation and Parks	No	
Mass Transit Access	No stops within half a mile	
<b>Natural Features</b>		
Elevations	23 to 26 feet above mean sea level	
Land Cover	1100: Residential, low density 6170: Mixed wetland hardwoods	
Soils	22: Evergreen-Wesconnett complex	
Flood Zones	No	
Wetlands	Category III	
Wildlife (applicable to sites greater than 50 acres)	N/A	

## Utility Capacity

The calculations to determine the water and sewer flows contained in this report 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. The method of calculating water and sewer flows to properly size infrastructure shall continue to be based on JEA's Water, Sewer and Reuse for New Development Projects document.

According to a JEA Availability Letter dated June 21, 2023, there is an existing 24-inch water main within Old St. Augustine Road right-of-way. Existing service to property may be used if adequate and in good condition (Service is over 10 years old. Submit a Water Service Locate and Flow Test request in Step 2 to determine if existing service is functional.) In addition, there is also an existing 16-inch force main along Old St. Augustine Road in front of the property and an existing 4-inch force main within Whitmore Oaks Drive right-of-way. A gravity sewer main extension will be required from the existing manhole within Whitmore Oaks Road ROW, approx. 490 LF northwest of this property.

## Future Land Use Element

Policy 1.2.8      Require new development and redevelopment in the Central Business District (CBD), Urban Priority Area (UPA), Urban Area (UA), and Suburban Area (SA) to be served by centralized wastewater collection and potable water distribution systems when centralized service is available to the site.

Development on sites located within the UPA, UA and SA are permitted where connections to centralized potable water and/or wastewater are not available subject to compliance the following provisions:

1. Single family/non-residential (estimated flows of 600 gpd or less) where 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. Non-residential (above 600 gpd) where the collection system of a regional utility company is not within 50 feet of the property.
3. Subdivision (non-residential and residential) where:
  - a. The collection system of a regional utility company is greater than 1/4 mile from the proposed subdivision.
  - b. Each lot is a minimum of ½ acre unsubmerged property.
  - c. Installation of dryline sewer systems shall be installed when programmed improvements are identified in the Capital Improvements Element which will make connections the JEA Collection Systems available within a five (5) year period.

## **Transportation**

The subject site is 1.10 acres and is accessible from Old St Augustine Road, a collector facility. The proposed land use amendment is located within the Suburban Development Area and Mobility Zone 1. The applicant proposes to change the existing land use from Low Density Residential (LDR) to Public Building & Facilities (PFB).

### **Comprehensive Plan Consistency:**

The Trip Generation Analysis is consistent with most recent version of the Transportation Element (TE) of the City of Jacksonville Comprehensive Plan (TE Objective 2.4 and Policies 1.2.1 and 2.4.2).

### 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.

Objective 2.4 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 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.

### **Trip Generation Estimation:**

Table A provides the daily trip generation comparison between the current and proposed comprehensive plan land uses and the potential transportation impacts on the roadway network. The current land use would result in 47 daily trips. If the land use is amended to allow for this proposed PFB development, this will result in 325 daily trips.

### **Transportation Planning Division RECOMMENDS the following:**

The difference in daily trips for the proposed land use amendment will result in 278 net new daily trips when compared to the existing land use. The Transportation Planning Division recommends ongoing coordinating efforts with the City of Jacksonville Traffic Engineer to determine if a traffic operational analysis is needed.

**Table A**  
**Trip Generation Estimation Scenarios**

Current Land Use Scenario	ITE Land Use Code	Potential Number of Units	Estimation Method	Gross Trips	Less Pass-By Trips	Daily Trips
LDR	210	5 SF DUs	T = 9.43 (X)	47	0	47
				<i>Existing Scenario Total</i>		<b>47</b>
Proposed Land Use Scenario	ITE Land Use Code	Potential Number of Units	Estimation Method	Gross Trips	Less Pass-By Trips	Daily Trips
PBF	730	14,437 SF	T = 14.374 (X) / 1000	325	0	325
				<i>Proposed Scenario Total</i>		<b>325</b>
				<b>Proposed Net New Daily Total</b>		<b>278</b>

Source: Trip Generation Manual, 11th Edition, Institute of Engineers

### Schools

The proposed amendment does not have a residential component; therefore, the proposed development will not have an impact on school capacity.

### Archaeological Sensitivity

According to the Duval County Archaeological Predictive Model, the subject property is located within an area of low, medium 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 1.2.2 The City shall continue to review new development for the potential of archeologically significant sites. The City shall utilize the most current version of the Archeological Sensitivity Predictive Model to identify areas of high probability for artifact concentrations.

Policy 1.2.5 The Planning and Development Department shall maintain and update for planning and permitting purposes, a series of GIS data layers and maps depicting recorded archaeological sites, historic districts and local landmarks.

### Wetlands

Review of City data indicates the potential existence of wetlands on the subject site and as such, based upon the city's geographic information data, the Planning and Development Department has determined the general location, type(s), size, quality and functional value of all wetlands located within the boundaries of the application site. Based on the information noted below, the proposed amendment is consistent with the Conservation/Coastal Management Element (CCME) wetlands policies.



Wetlands Characteristics:

Approximate Size: 0.24 of an acre

General Location(s): There are isolated wetland pockets located on the eastern portion of the property and along the southern boundary. The wetland area may have been encroached on in the past but has never been part of a larger system. The wetland is the result of the surface land elevation close to the high water table of the soil.

Quality/Functional Value: The wetland has a low functional value for water filtration attenuation and flood water storage capacity due to its isolation, size and/or the lowering of the hydro-period due to nearby site grading or drainage/retention improvements. In addition the wetland has no clear or significant impact on the City's waterways.

Soil Types/ Characteristics: (22) Evergreen-Wesconnett complex, depressional – The Evergreen series consists of nearly level, very poorly drained soils. These soils formed in decomposed organic materials underlain by thick sandy marine sediments. They are located in depressions. The soil is moderately slowly permeable to rapidly permeable. Generally, the high water table is at or above the surface for very long periods.

Wetland Category: Category III

Consistency of Permitted Uses: Category III Wetlands: Uses permitted subject to the limitations of CCME Policy 4.1.6 shown below – conservation uses permitted.

Environmental Resource Permit (ERP): Not provided by the applicant and none exists according to the St. Johns River Water Management District web site.

Wetlands Impact: The companion PUD zoning site plan indicates that development will impact wetlands. Mitigation will be required pursuant to CCME Policies 4.1.3 and 4.1.6.

Associated Impacts: None.

Relevant Policies: CCME Policies 4.1.3 and 4.1.6

### **CCME Policy 4.1.3**

The following performance standards shall apply to all development, except public utilities and roadways, permitted within Category I, II, and III wetlands:

(a) Encroachment

Encroachment in Category I, II, or III wetlands is the least damaging and no practicable on-site alternative exists; and

(b) No net loss

Development is designed and located in such a manner that there is no net loss to the wetland functions including but not limited to:

- i the habitat of fish, wildlife and threatened or endangered species,
  - ii the abundance and diversity of fish, wildlife and threatened or endangered species,
  - iii the food sources of fish and wildlife including those which are threatened or endangered,
  - iv the water quality of the wetland, and
  - v the flood storage and flood conveyance capabilities of the wetland;
- and

(c) Floodplain protection

Buildings are built at an elevation of sufficient height to meet the designated flood zone standards as set forth by the Federal Emergency Management Agency. The design must be in conformance with Chapter 652 (Floodplain Regulations) of the Ordinance Code; and

(d) Stormwater quality

In the design and review of developments which will discharge stormwater into the Category I, II, or III wetlands the following performance standards shall be used to protect water quality:

- i Issuance of a Management and Storage of Surface Waters permit pursuant to Chapter 40C-4 or 40C-40, F.A.C. or a stormwater permit issued pursuant to Chapter 40C-42, F.A.C., provides assurances necessary for compliance with subsections (i) - (iv) above provided the stormwater management system is constructed in accordance with the permit; and
- ii Regular monitoring and maintenance program on an annual basis for the performance of stormwater treatment systems

(e) Septic tanks

Septic tanks, drainfields and/or greywater systems are located outside the Category I, II, or III wetland area and not within 75 feet of the mean high water line of tidal bodies or within 75 feet of any wetland unless the Duval County Health Department grants a variance for a hardship case pursuant

to the provisions of Section 381.0065, F.S. Where public utilities are available, development is required to connect to these facilities; and

(f) Hydrology

The design of the fill shall include measures to maintain the wetlands hydrology of the site.

**CCME Policy 4.1.6**

The permitted uses within Category III wetlands shall be limited to the following land uses and associated standards, provided such use is consistent with the Future Land Use Map series (FLUMs)

(1) Any use not otherwise listed below, provided all of the basic requirements outlined in Policy 4.1.3 above are met:

(a) Silvicultural uses, provided the following standards are met:

Best Management Practices: Silviculture

Such activities are conducted in compliance with the provisions of the "Silvicultural Best Management Practices Manual", as may be amended, published by the Florida Division of Forestry, Department of Agriculture and Consumer Services.

(b) Agricultural uses, provided the following standards are met:

Best Management Practices: Agriculture

Such activities are to be in compliance with Chapter 40C-44, F.A.C.

(2) Any use that can be shown to be clearly in the public interest, subject to the requirements of (a), (b), (d) and (f) as noted in the performance standards outlined in Policy 4.1.3 above.

**PROCEDURAL COMPLIANCE**

Upon site inspection by the Planning and Development Department on September 15, 2023, the required notices of public hearing signs were not posted yet. Fifty-Three (53) notices were mailed out to adjoining property owners informing them of the proposed land use change and pertinent public hearing and meeting dates. After site inspection by the staff, the applicant provided a signed and notarized sign posting affidavit.

The Citizen Information Meeting was held on September 18, 2023. Five members of the public were in attendance with concerns regarding increased traffic on Old St. Augustine Road, hosting late night events will cause large crowds and potential disruptive noise to homes in the area, the use decreasing their home value, the use being rented out to the

general public and majority of the members expressed that this use should not be placed next to single-family homes.

## **CONSISTENCY EVALUATION**

### Consistency with 2045 Comprehensive Plan Goals, Objectives and Policies

#### Future Land Use Element (FLUE)

##### *Development Area*

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

Goal 1 To ensure that the character and location of land uses optimize the combined potentials for economic benefit and enjoyment and protection of natural resources, while minimizing the threat to health, safety and welfare posed by hazards, nuisances, incompatible land uses and environmental degradation.

Policy 1.1.7 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 1.1.9 Promote the use of Planned Unit Developments (PUD) zoning districts, cluster developments, and other innovative site planning and smart growth techniques in order to allow for appropriate combinations of complementary land uses, densities and intensities consistent with the underlying land use category or site specific policy, and innovation in site planning and design, subject to the standards of this element and all applicable local, regional, State and federal regulations. These techniques should consider the following criteria in determining uses, densities, intensities, and site design:

- Potential for the development of blighting or other negative influences on abutting properties
- Traffic Impacts
- Site Access
- Transition of densities and comparison of percentage increase in density above average density of abutting developed properties
- Configuration and orientation of the property
- Natural or man-made buffers and boundaries
- Height of development
- Bulk and scale of development

- Building orientation
- Site layout
- Parking layout
- Opportunities for physical activity, active living, social connection, and access to healthy food

Policy 1.1.21 Rezoning and 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 and to allow for the operation of real estate markets to provide adequate choices for permanent and seasonal residents and business with the intent that this balance of uses shall:

- A. Fosters vibrant, viable communities and economic development opportunities;
- B. Addresses outdated development patterns;
- C. Provides 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.

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.

Policy 1.2.8 Require new development and redevelopment in the Central Business District (CBD), Urban Priority Area (UPA), Urban Area (UA), and Suburban Area (SA) to be served by centralized wastewater collection and potable water distribution systems when centralized service is available to the site.

Development on sites located within the UPA, UA and SA are permitted where connections to centralized potable water and/or

wastewater are not available subject to compliance the following provisions:

1. Single family/non-residential (estimated flows of 600 gpd or less) where 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. Non-residential (above 600 gpd) where the collection system of a regional utility company is not within 50 feet of the property.
3. Subdivision (non-residential and residential) where:
  - a. The collection system of a regional utility company is greater than 1/4 mile from the proposed subdivision.
  - b. Each lot is a minimum of 1/2 acre unsubmerged property.
  - c. Installation of dryline sewer systems shall be installed when programmed improvements are identified in the Capital Improvements Element which will make connections the JEA Collection Systems available within a five (5) year period.

Objective 1.6      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.

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.

Property Rights Element (PRE)

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

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

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

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

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

According to the Category Descriptions of the Future Land Use Element (FLUE), Low Density Residential (LDR) is a category intended to provide for low density residential development. Generally, single-family detached housing should be the predominant development typology in this category. The maximum gross density in the Suburban Area shall be 7 units/acre when centralized potable water and wastewater services are available to the site and there shall be no minimum density; except as provided herein. The maximum gross density shall be 2 units/acre and the minimum lot size shall be half an acre when both centralized potable water and wastewater are not available. The maximum gross density shall be 4 units/acre and the minimum lot size shall be ¼ of an acre if either one of centralized potable water or wastewater services are not available.

Public Buildings and Facilities (PBF) is intended to accommodate major public use or community service activities. Siting public/semi-public facilities that are allowed in commercial, light and heavy industrial, residential and institutional categories as supporting uses will not require plan amendment. Some major uses, however, because of their scale and potential community impacts, may only be sited in this plan category. Principle uses in the PBF include, but are not limited to, schools, religious institutions, private clubs and nursing homes.

The 1.1-acre subject site is currently vacant and undeveloped land that fronts along and is accessed by Old St. Augustine Road, which is classified as a collector roadway. The applicant is proposing a change from LDR to PBF to allow for an American Legion Post on the site. While the surrounding area is entitled for residential uses in the LDR land use category, it is not uncommon to have PBF land use surrounded by LDR land use. Approximately one and a half miles west of the site, at 12021 Old St. Augustine Road, an amendment from LDR to PBF was approved pursuant to Ordinance 2019-008-E for a church. Further west, at the intersection of Greenland Road, Loretto Road, and Old St. Augustine Road is another PBF land use surrounded by LDR land use on three sides and developed with a church and school. North of the site, on Greenland Road, there are two PBF land use designations surrounded by LDR land use and developed with Mandarin High and Greenland Pines Elementary. The uses within these PBF designations are community service oriented, while the characteristics of the proposed use includes activities that are similar to commercial uses that are not compatible with abutting residential uses. The proposed zoning is a PUD, a tool that can provide for limitations on uses and activities, and that can require buffers, setbacks, and other mitigation. However,

the PUD does not sufficiently address compatibility with the surrounding residential neighborhood. Therefore, the proposed amendment to PBF for a site in the Suburban Development Area does not provide for a land use pattern that results in a well-balanced combination of residential and non-residential uses and the PUD zoning does not ensure a gradual transition of densities and intensities between land uses. Therefore, the amendment is inconsistent with FLUE Goals 1 and 3, Objective 1.6 and Policies 1.1.7, 1.1.9, and 1.1.22.

The proposed amendment from LDR to PBF will have a negligible impact on the amount of land available to meet the housing needs of the population and will support real estate market flexibility on an undeveloped site in the Suburban Development Area. Therefore, the amendment is consistent with FLUE Policy 1.1.21.

According to a JEA Availability Letter dated June 21, 2023, there is an existing 24-inch water main within Old St. Augustine Road right-of-way, an existing 16-inch force main along Old St. Augustine Road in front of the property, and an existing 4-inch force main within Whitmore Oaks Drive right-of-way. Therefore, the amendment complies with FLUE Policy 1.2.8.

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

### **Vision Plan Consistency**

The application site lies within the boundary of the Southeast Vision Plan. The vision plan does not identify specific recommendations for the subject site or use. A charrette comment from Guiding Principle Two: Promote Mixed-Use/Mixed-income Redevelopment and Infill stated, "Neighborhood community centers are needed to keep activities localized." The proposed American Legion Post will be a private club that does not serve as a community center.

### **Strategic Regional Policy Plan**

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

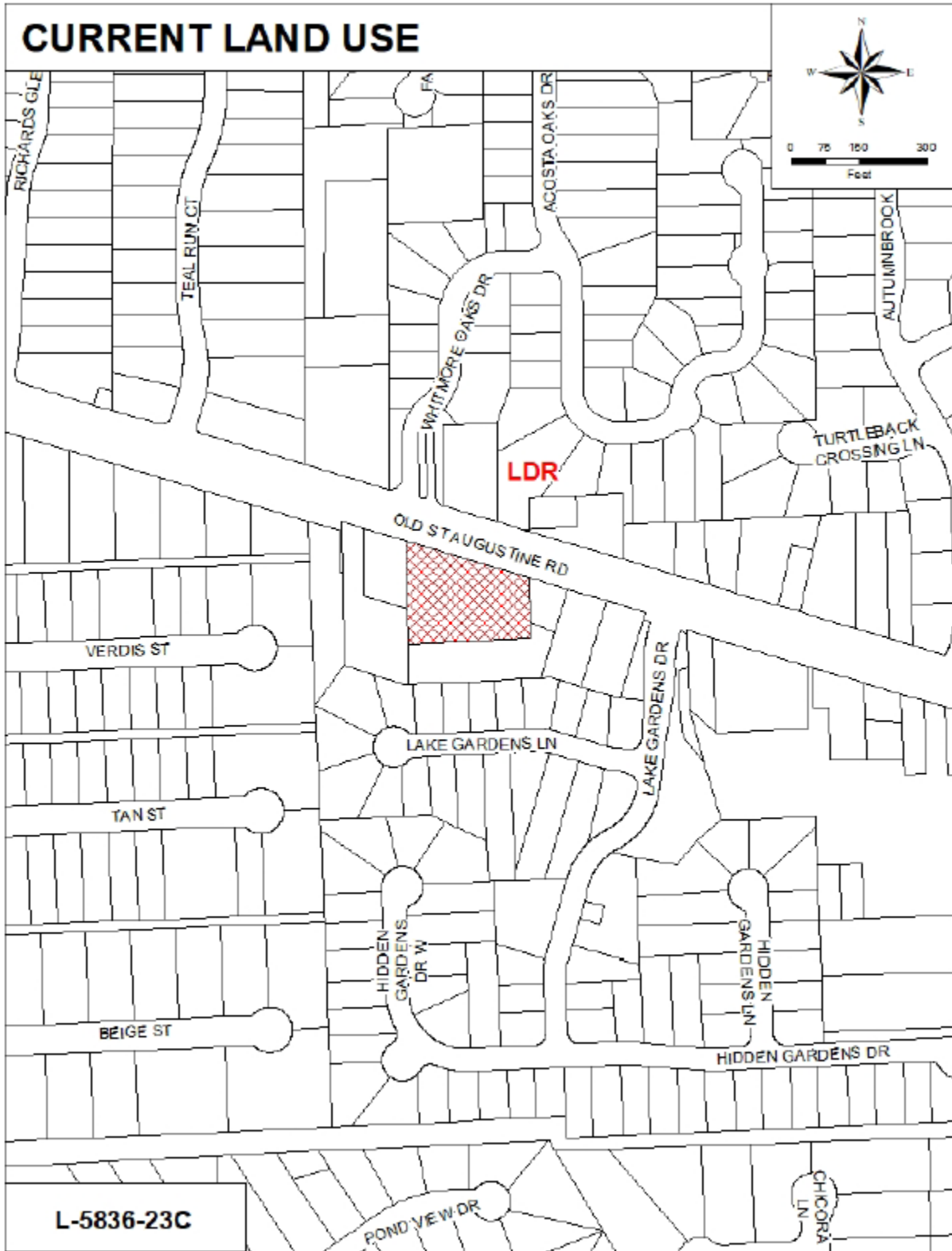
Policy 4: The Region supports strategies identified by the Regional Community Institute as they worked on First Coast Vision, including:

- Infill and redevelopment.

The proposed amendment would allow for the development of a currently vacant property. The proposed amendment would therefore allow for an additional infill development opportunity, consistent with Policy 4 of the Strategic Regional Policy Plan.



**CURRENT LAND USE AMENDMENT MAP**



**LAND UTILIZATION MAP**

