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August 26, 2015

Ms. Ellen Vause  
City Manager, City of Hawthorne  
6700 SE 221<sup>st</sup> Street  
Hawthorne, FL 32640

**RE: Envision Alachua Hawthorne Annexation - CPA Comments  
Project No. 20150790**

Dear Ms. Vause,

The applicant's responses to the Comprehensive Plan Amendment Comments issued on August 17, 2015 are below and an updated version of the related documents are attached.

General Comments:

1. Please provide analysis for the potential demand for all utilities, recreation, and schools for the current (or adopted) future land use and the proposed future land use maximum buildout potential according to the City's adopted levels of service.

**Response: An analysis has been prepared regarding the potential demand for public services based on the current Agriculture City and County future land use designations and is included with this response to comments. As indicated in the document, the maximum development scenario associated with the current FLU designation does not result in adverse impacts to the adopted Comprehensive Plan Level of Service.**

**An additional comment regarding this issue: Perhaps the City in their staff analysis should consider the net LOS impacts on public facilities, by comparing existing FLU development scenario to the proposed FLU scenario.**

a. In the case of water and wastewater, please provide the potential demand described above showing the delta between the adopted levels of service and the anticipated level of service.

**Response: An analysis of the potential demand and level of service has been provided, based on the existing future land use designation of the properties in the application. In the case of water and wastewater, both the adopted level of service and the anticipated level of service have been provided and are included in the memorandum prepared by Water & Air Research (dated 8/26/15) included in this response to comments.**

2. Where EA-Hawthorne is referenced in the proposed text amendment as a land use designation, please add "Mixed Use" to the end or provide an abbreviated name (e.g. EAMU).

**Response:** The application materials have been revised as suggested. Proposed Policies were revised to rename EA-Hawthorne, EA-Hawthorne Mixed Use (EA-HMU) throughout.

3. The applicant has requested that these amendments be submitted and processed through the state's expedited review process. Although we agree that DRIs have been eliminated, the legislature left in a stipulation that a DRI threshold development would go through the state's coordinated review process. Please provide justification on how this amendment qualifies for expedited review.

**Response:** It is true that new proposed 'development' previously subject to DRI review is now subject to State Coordinated Review (see, § 380.06 (30) F.S.). It is also true that a Comprehensive Plan amendment related to such proposed 'development' is now subject to State Coordinated Review (see, §163.3184 F.S.). This Comprehensive Plan, however, is not proposing 'development' nor is this Comprehensive Plan amendment related to a new proposed 'development' (see, §380.04 F.S. for the definition of 'development'). Even if deemed a new proposed 'development,' the maximum allowed residential and non-residential uses authorized by this comprehensive plan amendment (2.85M SF Light industrial, 150,000 SF Commercial and 800 DU) is well below all applicable DRI thresholds. Industrial development was eliminated as a DRI category in 2011 so there is no longer a threshold applicable to the industrial use, the commercial DRI threshold is 400,000 SF (of which the amendment maximum is 37.5%), and the residential threshold in Alachua County is 2,000 (of which the amendment maximum of 800 units is 40%). When combined for purposes of determining whether the applicable 'multi-use development' DRI threshold is triggered (see, Rule 28-24.032 F.A.C.), the land uses authorized by this Comprehensive Plan amendment remain well below 'multi-use development' threshold.

4. Does the applicant anticipate development of buildings taller than 35 feet in height? If so, an amendment would be necessary to Policy I.1.2.

**Response:** Yes, the applicant does anticipate buildings taller than 35 feet. Policy 1.1.2 has been revised to the following:

*EA-HMU shall provide a minimum of 30% open space measured over the entire area designated EA-HMU. All buildings within areas designated EA-HMU future land use and Light Industrial or Industrial implementing zoning district shall be restricted to a height limitation of 65 feet and structures not constituting a building shall be restricted to a height limitation of 100 feet. All buildings and structures within areas designated EA-HMU and Planned Unit Development (PUD) implementing zoning shall be restricted to height limitations established by the PUD.*

#### Future Land Use Text Amendments

5. It appears the proposed land use is only for Plum Creek properties. Is it possible to make this land use category more generic and available to other properties in the future?

**Response:** It is the desire of the applicant to propose a land use classification that includes a specific development program for the lands included to provide the city a clear and specific plan for the area under consideration. However, we would support the city developing a general Mixed Use Future Land Use Classification in the future.

6. Policy I.1.2 includes proposed new text that creates the EA Hawthorne Mixed Use Category. The policy includes the following development program:

Use	Maximum Development Program	Density (Dwelling Units / Gross Residential Acre)		Intensity FAR*2	
		Min	Max	Min	Max
Light Industrial	2, 850,000 SF	n/a	n/a	n/a	2.00
Commercial	150,000 SF	7.0 DU/AC	15 DU/AC	0.20	1.00
Residential	800 DU	2.0 DU/AC	7.0 DU/AC		

SF = square feet.  
DU = dwelling units.

Please note that the maximum development potential for all of EA-Hawthorne Mixed Use lands corresponds with the “Maximum Development Program,” except for beneficial public facilities.

**Response:** The table has been revised to move the “\*” from the FAR column to the Maximum Development Program Column and the footnote text has been revised to clarify this issue as shown in the response to #7.

7. Policy I.1.2 includes proposed new text that creates the EA Hawthorne Mixed Use Category. The policy includes proposed development program with a stipulation denoted by an (\*) next to the “Intensity FAR” column header. Please update the language as follows:

\* Beneficial public facilities to serve the community including, but not limited to, schools, places of worship, government services, recreation, utilities, and civic facilities, shall be provided as needed. Floor area for such facilities shall be allowed square footage that is in addition to the maximum nonresidential square footage indicated in the table above. Such facilities may be allowed to exceed the maximum allowable non-residential square footage in a reasonable manner provided a demonstrated public benefit.

EA-Hawthorne Mixed Use shall provide a minimum of 30% open space measured over the entire area designated EA-Hawthorne Mixed Use.

**Response:** The footnote has been revised to the following:

***\* Customary Ancillary Community Oriented Uses that are designed to serve the EA-HMU development and the Hawthorne community at-large, including, but not limited to, schools, places of worship, government services, recreation, utilities, and civic facilities, shall be provided as needed. Such uses shall be permitted through the rezoning process and shall not be limited by the Maximum Development Program square footage indicated in the table above.***

8. Proposed Policy I.5.1 includes new text that will allow extension of utilities outside the City to ensure efficient delivery of service within the City. Please describe the intent or the reason this change is necessary.

**Response:** In some cases, it may be a shorter distance or more efficient to provide loop service to the annexed area by running water or sewer line extensions through unincorporated area in the county to reach the EA-Hawthorne Mixed Use area. The intention

**is not to provide utility service to county unincorporated areas, only to provide utility services to the EA-Hawthorne Mixed Use area in the most efficient way possible.**

**This language was meant to clarify that proper utility extensions will be possible. If the City determines that this type of extension is currently permissible, then this policy language may not be required.**

9. Proposed Policy I.15.3b. includes new design standards requirements for development within the EA-Hawthorne Mixed Use. There is an exemption for institutional/research and office use from the lot size restrictions contained in existing Policy I.6.3. Policy I.6.3 appears to only address residential development. It is the intent of this proposed exemption to exempt residential development within a predominantly non-residential development? Please clarify the intent of this policy.

**Response: Policy 1.15.3b has been revised to the following:**

***Providing an interconnected, flexible land use framework that will accommodate a range of development parcel sizes and types able to serve a broad spectrum of users, shall not be governed by the residential lot size restrictions as provided of Future Land Use Element Policy I.6.3;***

10. Proposed Policy I.15.3c. includes new design standards requirements for development within the EA-Hawthorne Mixed Use including parking facilities. This proposed policy exempts new development within EA-Hawthorne Mixed Use from the parking lot dimensional standards and the 300 feet satellite parking facilities. Please note that if this policy were to be adopted as drafted, EA-Hawthorne Mixed Use properties would not be eligible to develop satellite parking facilities.

**Response: Policy 1.15.3c. has been added to address satellite parking. See text below:**

***Off-street / off-site (satellite) parking facilities are permitted within the EA-HMU to serve uses within the EA-HMU.***

11. Proposed Policy I.15.5 provides an allowance for one accessory dwelling unit per single family residential lot. In principle this is a good concept to provide a mixture of housing typologies and allows for affordable housing options. However, this is a new concept to the City and will require additional standards to be developed in the Land Development Regulations.

**Response: Noted. The applicant agrees and believes that additional revisions to the Land Development Regulations may be needed when the property is rezoned and developed in the future. The applicant will assist the City in these efforts at their discretion.**

12. Proposed Policy I.15.6 includes water conservation techniques. We applaud the water conservation efforts Plum Creek presents in these amendments. Subsection g. states that residential irrigation systems will be prohibited. Instead of not allowing irrigation all together, could this be changed to require reclaimed water as a possible irrigation method? This could reduce the number rapid infiltration basins needed to offset the wastewater effluent.

**Response: At this time, reclaimed water service is not available in the Hawthorne Area. The EA-HMU area will prohibit residential irrigation systems, consistent with the water conservation principles in the Envision Alachua Sector Plan. Should it become available, priority uses for reclaimed water should be natural systems, industrial applications, and agriculture.**

13. Proposed Policy I.15.10 states that the developer will fund portions of the off-site infrastructure improvements. However, the amendments to the Capital Improvements Program show only CDD and grants as potential revenue sources. Please also include developer contributions to the list of potential revenue sources.

**Response: The developer will be responsible for appropriate on-site improvements related to future development on the property. The large capital projects listed in the CIE table will be funded through a CDD and/or grants.**

14. The Capital Improvements Program shows a \$5.5M for a Sanitary Sewer Plan Extension, which was scheduled for 2013-2014. Please coordinate with the City Engineer to update this line item to establish an appropriate time frame and a more up to date estimated cost to be included in the updated CIP.

**Response: This project listing is a duplicate of the wastewater treatment system construction project listed later in the CIE table. This listing has been removed in the revised policy document included with this response to comments.**

15. The Capital Improvements Program shows a \$650K to replace and remove an existing water tower and pump, which was scheduled for 2008-2010. Please coordinate with the City Engineer to update this line item to establish an appropriate time frame and a more up to date estimated cost to be included in the updated CIP.

**Response: This project has been completed and is in service. It has been removed from the updated CIP included with this response to comments.**

16. Does the applicant anticipate any wetland impacts? If so, due to its large land holdings has the applicant considered mitigating wetlands on a site they have proposed as conservation?

**Response: If wetland impacts are proposed at the development plan stage, the open space in the EA-Hawthorne Mixed Use area (or other nearby Plum Creek properties) would be first considered for providing mitigation as required for environmental permits. The developer will comply with all local, state, and federal permitting requirements.**

Please let me know if you have any additional questions or concerns,

Sincerely,

Clay Sweger, AICP, LEED AP  
Principal / Director of Planning