

COMPAMD 2016-02, Greenbriar Downs
Submittal No. 4

Attachment “B-2”

Part One, Overview

Greenbriar Downs

(fka WCI C.R. 210 Land)

Comprehensive Plan Amendment Application

Revised June 15, 2018

Prepared for



Prepared by

PROSSER™

13901 Sutton Park Drive South, Suite 200
Jacksonville, FL 32224

Project No. 114062.02

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PROJECT TEAM

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Greenbriar Downs

(fka WCI C.R. 210 Land)

Comprehensive Plan Amendment
Application

Part One

Overview

Requested Amendment

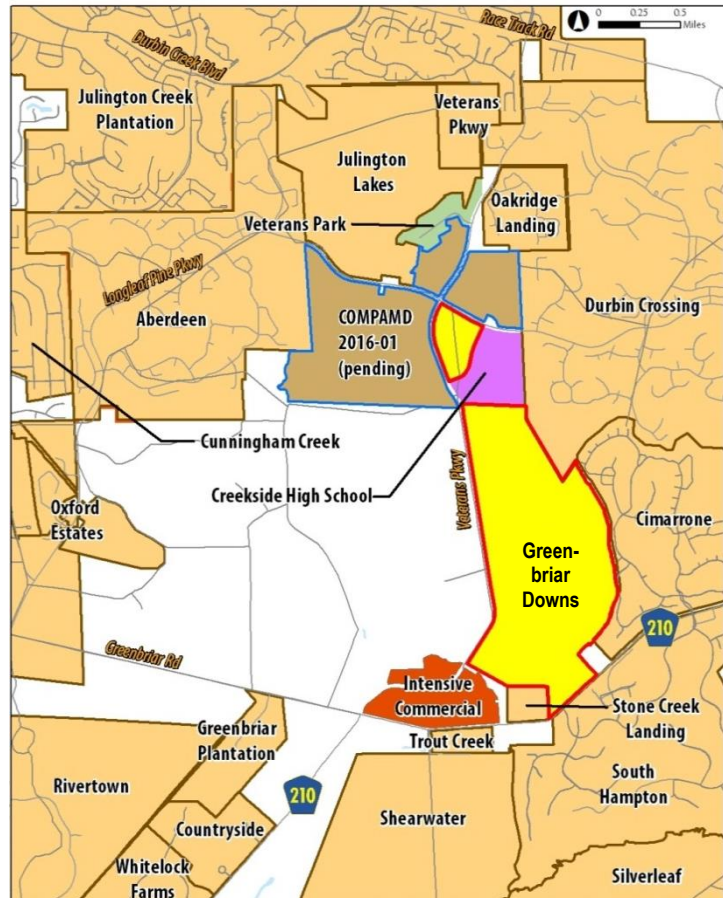
WCI sets the standard for building exceptional communities, creating amenities that challenge and exhilarate, while upholding their unwavering commitment to the places they call home. WCI has developed master-planned communities where today there are over 150,000 residents who enjoy amenity-rich lifestyles. WCI is fully committed to maintaining and enhancing this trust in St. Johns County and will demand the highest quality construction and customer service.

The Subject Property is immediately adjacent to lands with FLUM designations of Residential B and Intensive Commercial and is adjacent to the regional road network within the Northwest Sector of the County, specifically Longleaf Pine Parkway, C.R. 210 West and Veterans Parkway (C.R. 223). Surrounding uses include single-family residences in densities ranging from less than one (1) dwelling unit per acre to approximately four (4) dwelling units per acre.

The Applicant, WCI Communities, LLC (“WCI”), is the contract purchaser of approximately 784 acres located between Longleaf Pine Parkway and Greenbriar Road/County Road 210W on the east side of the future extension of Veterans Parkway/County Road 223 (“the Subject Property”). The Subject Property is comprised of parcel number 009860-0050 (approximately 728.78 acres) and parcel number 009833-0000 (approximately 55.40 acres) which are currently being used primarily for silvicultural purposes. The two parcels are separated by Creekside High School.

The Subject Property is presently designated Rural/Silviculture on the County’s 2025 Future Land Use Map (“FLUM”) and is presently zoned Open Rural. The Applicant is requesting a Comprehensive Plan Amendment to change the FLUM designation of the Subject Property to Residential B and a set of site-specific policies establishing the maximum number of dwelling units and Neighborhood Commercial square feet permissible on the Subject Property. The Applicant has submitted a companion application for rezoning (File No. PUD 2016-07) the Subject Property to Planned Unit Development (“PUD”).

A Requested FLUM and Generalized Site Plan that illustrates the plan of development of the Subject Property are included within **Part Three** of this application package. The Applicant proposes to develop up to 818 Age-Restricted Residential dwelling units, 18-hole Golf Course, and 160,000 square feet of Neighborhood Commercial uses. As the baby boomer generation moves closer to retirement age, many are looking for a residence that offers a social life, recreational amenities, privacy and relaxation. Greenbriar Downs is designed to meet these needs and cater to residents who want to be socially, physically, and mentally active. Age-Restricted communities should not be confused with nursing homes or assisted living facilities. They are independent living, age-restricted neighborhoods for those who want to downsize and live a more maintenance-free lifestyle planning for the next chapter in their life.



The project is proposed and planned to be developed within two (2) ten-year phases, commencing within three (3) years of Board of County Commissioners approval of the companion PUD. Consistent with St. Johns County Land Development Code Subsection 4.01.02.C.10, silvicultural operations will continue to be allowed on the Subject Property per the PUD master development plan.

The requested Residential B FLUM designation is allowed a maximum residential density of two (2) dwelling units per net acre and maximum Neighborhood Commercial intensity of 10,000 square feet per acre. The Generalized Site Plan (see **Part Three**) illustrates the consistency of density proposed for the Subject Property in relation to the existing, approved lands located to the east, north and south that are presently designated Residential B.

Parcel	Total Acres	Upland Acres	Impacted Wetlands Acres	Conserved Wetland Acres
South Parcel	728.78	345.36	26.04	357.38
North Parcel	55.40	37.62	7.72	10.06
Subject Property	784.18	382.98	33.76	367.44

Maximum Potential Residential	Acres	Max. Density	Dwelling Units
South Parcel Uplands (incl. Impacted wetlands)	371.40	2 DUA	742
South Parcel Optional Density Bonus ⁽¹⁾	35.74	2 DUA	71
North Parcel Optional Density Bonus ⁽²⁾	1.01	2 DUA	2
North Parcel Optional Density Bonus ⁽³⁾	6.00	2 DUA	12
Total			827

- (1) 10% of South Parcel wetlands (357.38 acres) proposed for conservation pursuant to FLUE Policy A.1.11.1(m)(7)
- (2) 10% of North Parcel wetlands (10.06 acres) proposed for conservation pursuant to FLUE Policy A.1.11.1(m)(7)
- (3) 6.00 acres dedicated for public benefit pursuant to FLUE Policy A.1.11.1(m)(7)

Maximum Potential Commercial	Acres	Max. Intensity	Square Feet
North Parcel Uplands	8.28	10 KSFA	82,800
North Parcel Uplands Impacted Wetlands	7.72	10 KSFA	77,200
Total			160,000

The requested site-specific Future Land Use text amendment is as follows:

Policy A.1.11.1(m)(8)(L) The North Parcel within the Property known as Greenbriar Downs (approximately 55 acres) described in Ordinance No. 2018-__ is assigned the Residential B future land use designation. The development intensity of the North Parcel shall not exceed 160,000 square feet of those non-residential uses and other uses set forth in the Greenbriar Downs PUD. Proposed changes to increase the allowed intensity of the North Parcel within Greenbriar Downs are subject to the provisions of Chapter 163, Florida Statutes.

The South Parcel within the Property known as Greenbriar Downs (approximately 728 acres) described in Ordinance No. 2018-__ shall be allowed to be developed with a maximum of 818 Age-Restricted Residential attached and detached dwelling units and related uses as set forth in the Greenbriar Downs PUD. Proposed changes to increase the allowed density of the South Parcel within Greenbriar Downs are subject to the provisions of Chapter 163, Florida Statutes.

The proposed change of the Subject Property's FLUM designation to Residential B is consistent and compatible with the land uses of surrounding properties and the vision of the Northwest Sector Plan. The existing Development Area Boundary abuts the Subject Property so extending it to include the project will not result in urban sprawl or incompatible uses or densities. In addition, the extension of the Development Area Boundary will continue to allow for efficient services and infrastructure in order to provide for compact contiguous development within the Northwest Sector without leaping over undeveloped areas.

Northwest St. Johns County Residential Communities	Future Land Use Category	Dwelling Units (DU)	Size (acres)	Uplands (acres)	Gross Density (DU/acre)	Net Density (DU/acre)
Aberdeen	RES C	2,018	1,313	791	1.5	2.5
Durbin Crossing	RES B & RES C	2,498	2,047	1,155	1.2	2.2
Julington Creek Plantation	DRI (pre-1990)	6,400	4,150	2,931	1.5	2.2
Oakridge Landing	RES C	196	157	81	1.3	2.4
Julington Lakes	RES B	512	598	256	0.9	2.0
Veterans Parkway (aka Durbin Creek Estates)	RES C	145	103	58	1.4	2.5
Shearwater	RES C	2,633	1,520	871	1.7	3.0
South Hampton	RES B	779	960	558	0.8	1.4
Stone Creek Landing	RES B	44	33	22	1.3	2.0
Greenbriar Downs (requested)	RES B	818	784	371	1.0	2.2

There are a number of benefits and reasons to amending the FLUM designation for the Subject Property from Rural/Silviculture to Residential B, including:

- The Subject Property is located in the Northwest Sector of St. Johns County, an area that is very attractive for new residents wishing to live in St. Johns County. The County has issued an increased number of building permits for construction of homes in this area in the last two years to help meet market demand, at densities equal to or exceeding the requested density for the Subject Property. There is ample evidence of the strong housing market for active seniors in St. Johns County and the proposed amendment seeks to address demand from this particular market.
- The Board of County Commissioners has approved similar changes from Rural/Silviculture to Residential B for Julington Lakes (COMPAMD 2013-07) and Stone Creek Landing (COMPAMD 2014-01). An amendment from Rural/Silviculture to Residential C for Veterans Parkway (COMPAMD 2015-02) just north of the Subject Property was adopted by the Board of County Commissioners on February 2, 2016. COMPAMD 2016-01, an unrelated but adjacent application, is presently under review by the County.
- The intended plan of development illustrated on the Generalized Site Plan is unique in the market and will preserve the vast majority of wetlands, designing around the sensitive natural areas and maintaining their inherent value to the region.
- The Subject Property is proposed to be accessed directly from County Road 210 West as well as by an extension of Veterans Parkway/County Road 223 per the companion rezoning application PUD 2016-07.
- The Subject Property is immediately adjacent to lands designated Residential B and the proposed development will provide needed homes and neighborhood commercial uses to meet market demand and respond to community life cycles within the County as other projects are entering their final stages.
- As an Age-Restricted Residential community, the potential development of the South Parcel on the Subject Property will generate substantially less impacts upon the regional road network and zero impact to the public school system while at the same time contributing significantly to the revenue stream of St. Johns County. Accordingly as the County continues to seek ways to balance growth with the impact to public services, the proposed development will be a net gain to the overall health of the County and as such, a great step in the right direction for St. Johns County. Because of its proximity to existing development and infrastructure, the proposed development will not contribute to urban sprawl.
- St. Johns County is projected to have a long-term housing demand of several hundred new homes per year, and the Greenbriar Downs project will help contribute towards providing potential new residents an attractive supply to meet that demand, as well as economic development with neighborhood commercial uses in the area. The County's resident population is projected to continually increase, nearly doubling by the year 2040.

<u>Year</u>	<u>County Population</u>	<u>Increase from 2015</u>
2015	214,805	-
2020	253,401	38,596 (+18%)
2025	290,898	76,093 (+35%)
2030	324,997	110,192 (+51%)
2035	356,500	141,695 (+66%)
2040	386,098	171,293 (+80%)

Source: University of Florida, Bureau of Economic and Business Research



Comprehensive Plan Amendment Application
St. Johns County Growth Management Services Department
 4040 Lewis Speedway
 St. Augustine, Florida 32084
 Phone (904) 209-0675 Fax (904) 209-0676

This application, together with ALL REQUIRED EXHIBITS and application fee, should be completed and filed with the Long Range Planning Division prior to the established filing deadline for the public hearings before the Planning and Zoning Agency and Board of County Commissioners. A COMPREHENSIVE PLAN AMENDMENT DOES NOT ENTITLE THE APPLICANT TO A DEVELOPMENT PERMIT OR CERTIFICATE OF CONCURRENCY.

File No. COMPAMD 2016-02 Fee _____ Date 04-10-17 (Rev. 05-29-18)
 Property Owner(s) Raydient LLC Phone 904.261-0833
 Address 1 Rayonier Way Fax _____
 City Yulee State FL Zip Code 32097 Email BillW@Raydientplaces.com
 Are there any owners not listed No Yes If yes please list on separate sheet to be included with your application
 Applicant WCI Communities, LLC Phone 904.380.0948
 Address 9440 Philips Highway, Suite 7 Fax _____
 City Jacksonville State FL Zip Code 32256 Email scott.keiling@Lennar.com

Type of Request This is a request to amend the **St. Johns County Comprehensive Plan** as follows:

Text Amendment (Sign certification statement and attach additional pages as necessary)
 Element Future Land Use Goal, Objection or Policy # A.1.11.1(m)(8) Page _____
 Future Land Use Map Amendment (Complete the following sections)
 Existing Future Land Use Map Designation RS Zoning OR
 Proposed Future Land Use Map Designation B Zoning PUD

Location/Description: Property Appraiser's Parcel Identification No. 009860-0050, 009833-0000
 Street Address/Location Between Longleaf Pine Parkway and Greenbriar Road/CR 210W, east of future CR 223 extension
 Total Acreage 784 Overall Dimensions _____ Flood Zone X, A, XS
 Adjacent Future Land Use Designation North: RES B, R/S South: IC, RESB East: RES B & C West: RESB, C, B
 Wetlands: Yes: No: Type: 441H, 524, 630 Acres: 401.20
 Soil Associations: Eleven different types of soils located on the Subject Property are illustrated on the enclosed Soils Map
 Provide brief description of existing property. Include existing land cover and uses, any existing structures, infrastructure.

The Subject Property is comprised of two parcels separated by Creekside High School, both undeveloped with no existing structures and consists of managed silvicultural use (planted pines) adjacent to existing single-family residential and neighborhood commercial uses and the future extension of Veterans Parkway (CR 223).

CONSISTENCY WITH COMPREHENSIVE PLAN (attach separate pages):

1. Provide justification/reasons for not developing in designated development areas as shown on Future Land Use Map. Include economic reasons and, if available, market study.
2. Provide information regarding the consistency of the proposed land use amendment with the adopted Future Land Use Element objectives and Policies and any other relevant section of the Comprehensive Plan. Also address consistency with the Strategic Regional Policy Plan and the State Comprehensive Plan. *Provided as Part One*

ESTIMATED IMPACT ON THE AVAILABILITY OF PUBLIC FACILITIES:

3. Describe how property is to be developed. Include phasing, uses and estimates of (a) number and type of dwelling units; (b) square feet and type of commercial/industrial uses; (c) open space and recreational area; (d) buffers; (e) wetlands; (f) drainage and infrastructure areas; and (g) other uses and sizes. Account for all acres. Provide phasing dates and anticipated buildout. *See next page*
4. (a) The project will use: public sewer or private sewer or septic tank. (golf course only)
 (b) The project will use: public water or private water or private well.
5. (a) Will the project build its own water plant? Yes No.
 (b) Will the project build its own sewage plant? Yes No.
6. If public or private utilities are to provide services, attach letters from the utility company or companies stating whether the utility company anticipates the availability of capacity to service the project through all phases. *Provided as Part Three*
7. Estimated Water and Sewage Demand:

	Phase (Years)	Use	GPD	Peak
Water		Res & Com	316,300	1,265,200
Sewage		Res & Com	316,300	1,265,200
Water Utility	Name: JEA		Address: 21 West Church Street, Jax, FL 32202	
Sewer Utility	Name: JEA		Address: 21 West Church Street, Jax, FL 32202	

8. Describe anticipated drainage system: Master stormwater management system(s) will be constructed in accordance with the requirements of St. Johns County and the St. Johns River Water Management District

9. Estimate the Solid Waste Demand by 5.7 pounds per person per day or by use. Indicate methodology: (Res DU x 2.43 x 5.7) (Com SF x 0.055)

Phase (Years)	Number of People or Use	Pounds per Day
Phase 1	200, 80KSF	7,170
Phase 2	818, 160KSF	20,130

10. Estimate the Transportation Disadvantaged Van Services Demand by applying 1.5 percent times the number of Dwelling Units times 2.44 Persons Per Unit. (Only applies to residential developments.)

Phase (Years)	demand = Dwelling Units X 2.44 Persons Per Unit X 0.015
Phase 1	7.29
Phase 2	29.82 (cumulative)

11. Estimate the Recreation and Open Space Demand of residential projects by applying the following formulas:
 - (a) Number of Dwelling Units X 2.4 Persons Per Unit X 5 Acres Per 1,000 Population for Neighborhood/Community Park Recreation, by phase:
 Phase 1 = 2.43 acres, Phase 2 (cumulative) = 9.94 acres
 - (b) Number of Units X 2.5 Persons Per Unit X 24 Acres per 1,000 Population for Regional/Open Space, by Phase.
 Phase 1 = 11.66 acres, Phase 2 (cumulative) = 47.71 acres

Phasing Schedule

Greenbriar Downs is proposed be developed in two (2) ten (10) year phases with commencement occurring within three (3) years of Board of County Commissioners approval of the companion rezoning.

Phase 1	200 Age-Restricted Senior Adult Housing – Detached dwelling units 80,000 Neighborhood Commercial/Retail square feet
Phase 2	202 Age-Restricted/Senior Adult Housing – detached dwelling units 416 Age-Restricted/Senior Adult Housing – attached dwelling units 80,000 Neighborhood Commercial/Retail square feet
Total	402 Age-Restricted/Senior Adult Housing – detached dwelling units 416 Age-Restricted/Senior Adult Housing – attached dwelling units 160,000 Neighborhood Commercial/Retail square feet

Subject Property

Site Area	South Parcel	728.78 acres
	North Parcel	55.40 acres
	Total	784.18 acres
Wetland Area	South Parcel	383.42 acres
	North Parcel	17.78 acres
	Total	401.20 acres
Open Space/Rec	South Parcel	550.34 acres (wetland preserve, golf course & community center)
	North Parcel	16.06 acres (wetland preserve & public land)
	Total	566.40 acres
Upland Buffer	South Parcel	20.50 acres
	North Parcel	4.84 acres
	Total	25.34 acres
Scenic and Development Edges	South Parcel	18.29 acres
	North Parcel	2.81 acres
	Total	21.10 acres

12. Traffic – Estimate Average Weekday Peak Hour Trips by phase by number of dwelling units and square feet of each on-residential use using the trip generation rates from the latest edition of the Institute of Transportation Engineers *Trip Generation Manual*.

Phase (Years)	Dwelling Units or Square Feet of Each Use	Trips
Phase 1	200 DU Sr Adult Housing ITE 251, 80 KSF Comm ITE 820	543
Phase 2	202 DU Sr Ad Hous ITE 251, 416 DU Sr Ad Hous-Attached ITE 252, 80 KSF	470

13. Estimate the area of impact using the *Traffic Impact Methodology and Procedures* contained in Appendix A of the **Land Development Code** and estimate the impacts on the Levels of Service on the segments within the Area of Impact by Phase. ATTACH CALCULATIONS (staff will complete for up to 29.99 peak hour trips).

Phase Years	Road Segment #	Existing LOS	Project Trips	LOS with Project & Background Traffic by Phase End

REQUIRED EXHIBITS: (MUST BE SUBMITTED IN THIS ORDER)

1. Owner's Authorization for Agent Form. All persons listed on the deed, purchase agreement, title opinion or other acceptable proof of ownership must complete an Owners Authorization.
2. Proof of ownership (copy of deed or purchase agreement, and title opinion).
3. Legal description and tax identification number.
4. General location map with subject property clearly identified.
5. Property Appraiser's Map with identification of subject property, zoning, and Comprehensive Plan Land Use Designation within 300 feet of property.
6. Comprehensive Plan Future Land Use Map with subject property clearly identified.
7. Most recent aerial of site showing property boundaries.
6. Copy of soils map showing property boundaries.
8. Generalized site plan with uses, phases as described in Question 13.
9. Water and Sewer Utility letter, if applicable (Question 16).
10. One (1) copy of application and exhibits.

NOTE: On each map include north arrow, property outline, name of person or firm who prepared the map, date of map preparation, and source of the map.

I HEREBY CERTIFY THAT ALL INFORMATION IS CORRECT:

Signature of owner(s) or authorized person if Owner's Authorization Form is attached:

Printed or typed name(s): Anthony S. Robbins, AICP c/o Prosser, Inc.

Signature(s): *Anthony S. Robbins*

NAME AND ADDRESS OF PERSON TO RECEIVE ALL CORRESPONDENCE REGARDING THIS APPLICATION:

Name: Anthony S. Robbins, AICP

Mailing Address: Prosser, Inc., 13901 Sutton Park Drive South, Suite 200, Jacksonville, FL 32224

Phone: 904.739.3655 FAX: 904.730.3413 E-mail: trobbsin@prosserinc.com

State of Florida County of ~~St. Johns~~ Duval *cs*

Signed and sworn before me on this 21st day of May, 2018 *cs*

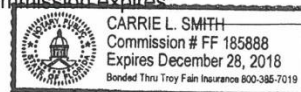
By Anthony S Robbins

Identification verified: personally known

Oath sworn: Yes ___ No

Notary Signature *Carrie L Smith*

My Commission expires:



CONSISTENCY WITH 2025 COMPREHENSIVE PLAN

This section references numerous Objectives and Policies contained within the St. Johns County 2025 Comprehensive Plan. The Objectives and Policies relevant to the proposed amendment are identified in bold type followed by italicized information addressing how the proposed amendment is consistent or otherwise supports each Comprehensive Plan Objective or Policy.

* * * * *

Future Land Use Element Goal A.1

To effectively manage growth and development by designating areas of anticipated future development which satisfy demand where feasible, in a cost-efficient and environmentally acceptable manner. Encourage and accommodate land uses which make St. Johns County a viable community. Create a sound economic base and offer diverse opportunities for a wide variety of living, working, shopping, and leisure activities, while minimizing adverse impact on the natural environment.

The Subject Property is located in a rapidly growing area of St. Johns County that can accommodate community residential units that are designed with nature. The project's infill location, being surrounded by existing and planned single-family residential development, is a logical and anticipated location for expansion of the Development Area Boundary within the Northwest Sector. In addition, the residential and neighborhood commercial uses will be serviced by existing public services to support the development that include water, wastewater, reclaimed, and electric services. The Applicant has taken great care in designing the Subject Property to minimize impacts to the environment. The Generalized Site Plan will take care to develop around the existing system of contiguous wetlands on the Subject Property enabling them to frame the development as natural buffers to provide the residents with a strong sense of natural separation from the surrounding suburban environment. The South Parcel is proposed to be developed with attached and detached Age-Restricted Residential units with associated amenities, including an 18-hole golf course which will assist in providing variety for an increasing category of residents within the Northwest Sector. The North Parcel will also provide opportunities for residents within the Northwest Sector to shop for Neighborhood Commercial uses and provide for additional recreational opportunities within this area.

Future Land Use Element Policy A.1.1.1

The County shall protect estuaries by ensuring compliance with state and federal standards for stormwater runoff and wastewater discharge into Outstanding Florida Waters, Class II and III waters through coordination between the County development review process and state and federal permitting requirements.

The Applicant is committed to the protection of natural resources through its on-site stormwater management and treatment system(s). Any stormwater runoff of discharge will comply with state and federal standards. The Subject Property is not located within an impaired drainage area or near an estuary and does not discharge to any Outstanding Florida Waters.

Future Land Use Element Policy A.1.2.1

The County shall only issue development orders or development permits consistent with the provisions of the County Concurrency Management System, as provided in the Land Development Code.

The intended plan of development will comply with concurrency requirements as mandated by Section 163.3180, Florida Statutes, including any provisions of the St. Johns County Land Development Code Article XI, Concurrency Management consistent therewith. This may include entering into a proportionate share agreement with respect to traffic concurrency, as required by Section 163.3180, Florida Statutes. The proposed Age-Restricted Residential community expressly prohibits any permanent resident 18 years of age or younger, therefore no school-age population will require accommodation by the St. Johns County School District.

Future Land Use Element Policy A.1.2.5

All Comprehensive Plan amendments, including Small-Scale Plan Amendments, if determined by the County the Small Scale amendment warrants such review, amendments as defined by Chapter 163, F.S., shall provide justification for the need for the proposed amendment and demonstrate how the proposed amendment discourages urban sprawl and not adversely impact natural resources. In evaluating proposed amendments, the County shall consider each of the following:

- (a) the extent to which the proposed amendment is contiguous to an existing Development Area which has developed in a manner providing a compact, contiguous development pattern with the proposed amendment;
- (b) the extent to which population growth and development trends warrant an amendment , including an analysis of vested and approved but unbuilt development;
- (c) the extent to which adequate infrastructure to accommodate the proposed amendment exists, or is programmed and funded through an adopted Capital Improvement Schedule, such as the County Capital Improvement Program, the Florida Department of Transportation Five-Year Work Program, the North Florida Transportation Planning Organization (TPO) Transportation Improvement Program, or will be privately financed through a binding executed agreement, or will otherwise be provided at the time of development impacts as required by law;
- (d) the extent to which the amendment will result in an efficient use of public funds needed for the provision of new infrastructure and services related to it;
- (e) the extent to which the amendment will not result in a sprawl development pattern as defined in Rule 9J-5.006(5), F.A.C., and will not discourage infilling of more appropriate areas available for development within existing Development Area Boundaries; and
- (f) the extent to which the amendment will result in a sustainable development pattern through a balance of land uses that is internally interrelated; demonstrates an efficient use of land; ensures compatible development adjacent to agriculture lands; protects environmental qualities and characteristics; provides interconnectivity of roadways; supports the use of non-automobile modes of transportation; and appropriately addresses the infrastructure needs of the community.
- (g) the extent to which the amendment results in positive market, economic and fiscal benefits of the area as demonstrated through a market demand analysis, economic impact analysis and fiscal impact analysis.

*Please refer to the Requested Future Land Use Map located in **Part Three** of this application. As previously noted, the Subject Property is located within the Northwest Sector of the County and is adjacent to the Development Area Boundary. This Comprehensive Plan Amendment proposes to extend the Development Area Boundary to encompass the Subject Property and amend the Future Land Use Map designation to Residential B to allow the development of Age-Restricted Residential, Neighborhood Commercial and recreational uses on the Subject Property.*

*The Development Area Boundary extension is a logical progression of development within the Northwest Sector of the County. Over the past decade, St. Johns County has experienced a tremendous amount of growth and a lot of this growth is located within the Northwest Sector. The Northwest Sector of the County has evolved from a sparsely populated rural area to a vibrant collection of suburban residential, Neighborhood Commercial communities while at the same time maintaining its rural characteristics along the roadway network through the use of development and scenic edges. The proposed Comprehensive Plan Amendment to Residential B for the Subject Property will assist in achieving the goal of a complete communities approach to planning within the Northwest Sector by allowing Age-Restricted Residential and Neighborhood Commercial development (consistent with the Northwest Sector Overlay objectives and policies of the County Comprehensive Plan Future Land Use Element) to be developed on the Subject Property. The Overlay and community approach to development in the Northwest Sector was adopted to assist this portion of the County in evolving to meet market demands and ensure such evolution did not result in urban sprawl, disconnected subdivision development, or an unclear separation between rural and urban uses. The success of the Northwest Sector Overlay can be seen in the already approved as well as existing development outlined in **Table 1-1** found on the next two pages of this application.*

**Table 1-1
Northwest Sector Development Summary**

Approved PUDs	<u>Res. DU</u>	<u>Non-Res. SF</u>	Approved DRIs	<u>Res. DU</u>	<u>Non-Res. SF</u>
210 Commerce Centre	0	49,900	Aberdeen	2,018	110,000
Anderson Park	120	480,000	Ashford Mills	2,633	280,000
Ashley Oaks	75	0	Bartram Park (w/in County)	367	418,914
Bartram Executive Park	0	46,200	Durbin Crossing	2,498	200,000
Bartram Plantation	145	0	Julington Creek Plantation	6,292	391,950
Bartram Trails	48	0	RiverTown	4,500	500,000
Bartram Walk (East)	0	140,000	Saint Johns	7,200	5,615,000
Boardwalk	12	0	Silverleaf Plantation	10,700	1,770,000
Bridle Ridge	0	70,000	World Commerce Center	1,156	3,507,500
Cimarrone	682	0	Subtotal DRIs	37,364	12,793,364
Cunningham Creek Plantation	660	0			
Flora Branch	0	90,000			
Fruit Cove Shopping Center (Btrm. Walk W)	0	208,080			
Johns Creek	583	246,000	Approved PRDs	<u>Res. DU</u>	<u>Non-Res. SF</u>
Johns Glen	120	0	Bartram Downs	76	0
Julington Lakes	466	0	Breakaway Trails	5	0
Julington Village (Publix)	0	129,716	Colee Cove Landing North	23	0
Liberty Park	296	0	Countryside	24	0
Mill Creek Landing	83	0	Equestrian Way	23	0
North Florida Industrial Park	0	55,000	Golden Eye	6	0
Oak Harbour	98	0	Greenbriar Plantation	19	0
Oakridge Landing	196	12,000	Palmo Creek	69	0
Pacetti Road Plaza	0	32,803			
Palm Lakes (Murabella)	740	120,000	Muellers Landing**	59	0
Plantation, The (Glen St. Johns)	494	0	Osprey Cove Estates	4	0
River Pointe	24	0	River Plantation**	27	0
Roberts Rd PUD (Greenfield)	59	0	Rivertown Riverfront Lots N	29	0
Samara Lakes	872	0	Whitelock Farms	62	0
Shoppes at Mill Creek	0	22,200	Subtotal PRDs	426	0
South Hampton	779	100,000			
Southern Grove	90	0			
Southlake	200	100,000			
St. Johns Forest	545	75,000			
St. Johns Golf & CC	799	0			
Stone Creek Landing	44	0			
Stonehurst Plantation	530	0			
Sunshine 13	159	0			
Sunshine 16	60	168,000			
Villa Sovana	12	0			
Village Commons	0	17,970			
Vinings, The	88	150,000			
Westminster Woods (Wesley Manor)	605	0			
Whisper Ridge	405	0			
Winchester PUD	143	0			
Wingfield Glen	635	0			
Worthington	38	0			
Worthington Park	170	0			
Subtotal PUDs	11,075	2,312,869			

	<u>Res. DU</u>	<u>Non-Res. SF</u>
Developments of Regional Impact	37,364	12,793,364
Planned Unit Developments	11,075	2,312,869
Planned Rural Developments	426	0
Total	48,865	15,106,233
Approved Development	309 SF/DU	
Comprehensive Plan Goal	112 SF/DU	

Northwest Sector Civic Space

Revised 08.19.16

<u>Civic Facility</u>	<u>STRAP</u>	<u>Street Address</u>	<u>Square Feet</u>
Bartram Trail Branch Library	250000 0062	60 Davis Pond Boulevard	15,004
Bartram Trail High School	000710 0030	7399 Longleaf Pine Parkway	314,577
Creekside High School	009831 0000	1937 Longleaf Pine Parkway	242,988
Cunningham Creek Elementary School	009770 0020	1205 Roberts Road	75,805
Durbin Creek Elementary School	249000 7060	4100 Race Track Road	87,495
Fire Station 10 (World Golf Village)	028670 0016	235 Mrabella Parkway	8,182
Fire Station 17 (Sampson)	026430 0030	10001 Cartwheel Bay Avenue	6,432
Fire Station 2 (Switzerland)	003250 0010	1120 Sheefield Road	7,638
Fire Station 3 (Orangedale)	011387 0081	6010 State Road 13 N	7,524
Fire Station 4 (Bakersville)	029310 0011	3400 County Road 208	6,350
Fruit Cove Middle School	005680 0040	3180 Race Track Road	123,398
Julington Creek Elementary School	005675 0000	2316 Race Track Road	100,213
Liberty Pines Academy	023630 0042	10901 Russell Sampson Road	154,487
Mill Creek Elementary School	028210 0000	3720 International Golf Parkway	137,584
Mt. Olive Baptist Church	016330 0000	5800 State Road 13 N	3,546
Northwest County Annex	249000 4007	725 Flora Branch Boulevard	14,023
Pacetti Bay Middle School	028820 1430	245 Meadowlark Lane	160,111
Patriot Oaks Academy	009635 0004	475 Longleaf Pine Parkway	154,000 (Est.)
San Juan del Rio Catholic Church	002750 0000	1718 State Road 13 N	14,768
St. Johns County Convention Center	027010 0030	500 S Legacy Trail	90,183
Switzerland Community Center	003410 0000	2059 State Road 13 N	5,892
Switzerland Point M.S. & Hickory Creek E.S.	000675 0000	777 Greenbriar Road	251,640
Timerlin Creek Elementary School	010011 0010	555 W Pine Tree Lane	105,940
Wards Creek Elementary School	028800 1202	6555 State Road 16	109,927
Total			2,197,707

NWS Residential DU 43,865

Civic SF/DU (Comp Plan Goal) 30

Civic SF/DU (Existing) 45

Development within this area is not stagnate and continues to respond to the market demand. Over the past two years, the County has seen an increase in the issuance of building permits in the Northwest Sector. In addition, the Board of County Commissioners has approved land use map amendments within the Northwest Sector and continues to expand the boundary of the Development Area. The next logical extension of the Development Area is to encompass the Subject Property, which is adjacent to and/or surrounded by residential, commercial and civic uses. The extension of the Development Area Boundary within this area of the County, demonstrates that the County is directing future growth to the Northwest Sector. This direction of growth is logical and well planned as public infrastructure and facilities (e.g. water, sewer) are in place. Additional growth is needed as people move to the area seeking a better life for themselves and an Age-Restricted Residential community within the South Parcel will assist in meeting demand in the Northwest Sector for this growing population through a variety of residential units.

This Comprehensive Plan Amendment represents a logical extension of the Development Area as the Subject Property is surrounded by approved and existing residential and nonresidential development as well as utility infrastructure. The proximity of the Subject Property to public utility infrastructure will result in the efficient use and maximization of infrastructure within the Northwest Sector. As indicated in the attached JEA availability letters, water, sewer and reclaimed water connections are available for development of the residential and neighborhood commercial uses. In addition, JEA plans on utilizing the construction and installation of force mains for the development to upsize the force main to better accommodate development within this area. This upsize will be finalized as development of the Subject Property proceeds and will assist in providing additional capacity within a developing portion of the County. The Applicant may utilize septic tanks in limited situations for the golf course, subject to obtaining all necessary permits which will help ensure the septic system(s) will not adversely affect the public health or significantly degrade the groundwater or surface water.

The Comprehensive Plan amendment will maintain the Northwest Sector complete communities approach to planning by allowing residential units and neighborhood commercial uses to be developed on the Subject Property. The proposed neighborhood commercial uses are further defined in the PUD rezoning application, and the goal is that such uses will reduce vehicle miles traveled within the Northwest Sector by providing a shopping destination for residents within this area without having to leave the Northwest Sector of the County.

Approximately half of the South Parcel is comprised of wetlands that are proposed to be preserved. These wetlands will provide approximately 1,000 feet of natural buffer between the residential and park land uses to the south. WCI intends to preserve the eastern portion of the South Parcel and include it within the regional greenway system within the Northwest Sector. Planned crossings of existing wetland areas within the Subject Property, where feasible, will be located to utilize existing trail/logging roads to minimize new wetland impacts.

The South Parcel is proposed to have direct access to C.R. 210 West and to Veterans Parkway. In addition, WCI intends to provide an interconnected system of sidewalks within the South Parcel to connect the residential areas to the recreation area. The internal sidewalk network is proposed to connect to a County sidewalk located along County Road 210 West along with future connections to Veterans Parkway.

This Comprehensive Plan Amendment does not constitute urban sprawl and discourages it as set forth in FLUE Policy A.1.2.5 and Sec. 163.3177(6)(a)9, Florida Statutes as the development of the Subject Property will occur adjacent to other approved and existing developments and not result in leap frogging over undeveloped land. Development of the Subject Property will maximize the existing infrastructure within the Northwest Sector of the County and protect almost all of the wetlands within the South Parcel to provide a sustainable development while protecting the environment and character of the Northwest Sector.

Future Land Use Element Policy A.1.2.6

The extension or expansion of utilities and roads should promote compact, contiguous development patterns.

Part Three of this Application for Comprehensive Plan Amendment includes Water and Sewer Availability Letters from JEA dated March 9, 2018 and March 27, 2018. Longleaf Pine Parkway to the north, Veterans Parkway to the west, and Greenbriar Road/County Road 210 West located south of the Subject Property will provide adequate road access for the new residential community. The plan of development is emblematic of a compact, contiguous development pattern clustering together all 818 units and Neighborhood Commercial development on most of the upland portions of the Subject Property. In addition, where possible, planned crossings of existing wetland areas will be located to utilize existing trail/logging roads to minimize new wetland impacts.

Future Land Use Element Policy A.1.2.7

The County shall encourage urban and suburban growth in Development Areas where public facilities and services exist. Development Areas are those areas designated on the Future Land Use Map, which depict the overall future growth pattern of the County. Areas designated R/S and A-I are not Development Areas. Comprehensive Plan amendments to add development area shall be discouraged unless the applicant demonstrates the amendment provides economic development, job creation, preservation of the natural environment, or other public benefit.

While the Subject Property lies adjacent to the County's Development Area Boundary today, it represents a logical and orderly expansion of the Development Area Boundary, quite similarly to amendments expanding the boundary for Julington Lakes (COMPAMD 2013-07) and Stone Creek Landing (COMPAMD 2014-01). A similar one for Veterans

Parkway (COMPAMD 2015-02) was adopted by the Board of County Commissioners on February 2, 2016. COMPAMD 2016-01, an unrelated but adjacent application, is presently under review.

The development of the Subject Property will bring economic development through the proposed development of Neighborhood Commercial uses within the North Parcel. This Neighborhood Commercial development will provide the opportunity for economic activity in the Northwest Sector. The Retail Market and Impact Analysis dated March 2016 and prepared by URBANOMICS, Inc., which was provided to the County on July 19, 2016 and is on file with St. Johns County (the "Retail Market and Impact Analysis"), notes that the low per capita amount of retail space in St. Johns County indicates that a significant portion of retail spending by residents occurs by necessity outside the County. The proposed development of the Subject Property will provide the opportunity for Neighborhood Commercial uses for residents and will have the potential to spur additional economic development in the area as well as reduce trip generation within this area.

The development of the Subject Property will also provide job creation through construction jobs associated with development of the residential and non-residential portions of the Subject Property as well as through the employment opportunities associated with the Neighborhood Commercial uses within the North Parcel. The Retail Market and Impact Analysis estimates that the development of the Subject Property will generate 157 construction jobs and will generate 1,386 jobs from the operation of the Neighborhood Commercial uses, including 473 on-site and 913 off-site jobs.

Additionally, the proposed comprehensive plan amendment will provide the opportunity for preservation of the natural environment. The companion Application for Rezoning to Planned Unit Development (File No. PUD 2016-07) includes preservation of the wetlands comprising nearly half of the South Parcel as well as a significant amount of undisturbed upland buffers and passive open space. The companion Planned Unit Development is designed in such a way as to preserve, buffer, enhance, and protect wetlands, conservation areas, and wildlife habitat and to provide adequate buffering to environmentally significant lands. In addition, public services, including water, sewer, reclaimed, and electricity are immediately adjacent to the Subject Property. The Subject Property is proximate to Veterans Park, a major regional park owned and maintained by St. Johns County. The Generalized Site Plan illustrates recreation areas and preservation of the vast majority of the wetlands within the Subject Property.

In addition to the economic development, job creation, and preservation of the natural environment provided by this comprehensive plan amendment, the development of the Subject Property will also provide other public benefits through significant generation of revenues for the County. The Retail Market and Impact Analysis and the Fiscal Impact Analysis dated March 2016 and prepared by URBANOMICS, Inc., which was provided to the County on July 16, 2016 and is on file with St. Johns County (the "Fiscal Impact Analysis"), and was updated April 2018 estimates that the development of the Subject Property will generate significant revenue from ad valorem and real property tax revenues, state sales tax revenues, school capital outlay surtax revenues, and local option gas tax revenues. In addition, the Fiscal Impact Analysis indicates that the homes proposed in the companion Application for Rezoning to Planned Unit Development will achieve a much greater level of self-sufficiency in terms of paying for and offsetting costs of County services than the average home. The updated fiscal impact analysis was provided to the County as part of the Applicant's response to Staff comments (Submittal No.4).

Future Land Use Element Policy A.1.2.8

The County shall encourage infill development. Infill development is development on a vacant parcel or parcels of land within Development Areas that are surrounded by an existing built area. Compatibility of the infill development shall be considered by an existing built area. Compatibility of the infill development shall be considered with the development review process. Infill development shall not be considered in R/S or A-I areas.

The Subject Property is located in the Northwest Sector of St. Johns County, an area that is very attractive for new residents wishing to live in St. Johns County. The County has issued an increased number of building permits for construction of homes in this area in the last two years to help meet market demand, at densities equal to or exceeding the requested density for the Subject Property.

The Planning and Zoning Division has recognized the general vicinity of the Subject Property as an infill location. Applications for large-scale amendments north and south of the Applicant's proposed development have been supported by the County to meet the expanding market in the Northwest Sector. The Board of County Commissioners approved similar changes from Rural/Silviculture to Residential B for Julington Lakes (COMPAMD 2013-07) and Stone Creek Landing (COMPAMD 2014-01). An amendment from Rural/Silviculture to Residential C for Veterans Parkway (COMPAMD 2015-02) just north of the Subject Property was adopted by the Board of County Commissioners on

February 2, 2016. COMPAMD 2016-01, an unrelated but adjacent application, is presently under review. The map on page 1 illustrates how the Subject Property is immediately adjacent to the west and surrounded on its other sides by large-scale residential development, not located in the hinterlands of Rural/Silviculture portions of the County as Policy A.1.2.8 is designed to protect.

Future Land Use Element Policy A.1.3.1

The County shall continue to implement its Land Development Code providing standards and procedures for adequate buffers between incompatible uses. To ensure adequate buffering between incompatible uses, the County shall review and update its standards and procedures as necessary to ensure adequate buffering between incompatible uses.

The Applicant has filed a companion Application for Rezoning to Planned Unit Development which specifies the buffering to be provided within the new Age-Restricted Residential community. Due to the extensive wetland systems on the Subject Property, the buffers to be provided, including Scenic and Development Edges, meet those required by the St. Johns County Land Development Code as to areas outside the Subject Property. The Age-Restricted Residential community is completely compatible with the homes found within the immediately adjacent neighborhoods, both existing and planned. The non-residential elements on the North Parcel shall be appropriately buffered from external neighbors, recreational and educational properties and are compatible with the surrounding area.

Future Land Use Element Policy A.1.3.11

When a Comprehensive Plan amendment, rezoning or development application is considered, the County shall ensure compatibility of adjacent and surrounding land uses. Land uses, include but are not limited to permitted uses, structures, and activities allowed within the land use category or implementing zoning district. Compatibility means a condition in which land uses can co-exist in relative proximity to each other in a stable fashion over time such that no use is unduly negatively impacted directly or indirectly by another use. Compatibility does not mean “the same as”. Compatibility refers to the sensitivity of development proposals in maintaining the character of existing development and environments. The compatibility of land uses is dependent on numerous characteristics which may impact adjacent or surrounding uses. These include, but are not limited to: type of use, density, intensity, height, general appearance and aesthetics, odors, noise, smoke, dust, vibration, traffic generation, sanitation, litter, drainage, fire risk, air quality, vegetation, topography, soil conditions, wildlife, aquifer recharge, surface waters, drainage, protection of Listed Species or Essential Habitat, maintenance of public infrastructure, availability of potable water, sanitary sewer and other necessary public services and nuisances.

In order to ensure compatibility with a Comprehensive Plan amendment, the County may require the submittal of a companion zoning application, such as a PUD, Special Use request or other application showing development of the property. Amendments that result in unreasonable negative impacts and do not provide sufficient compatibility measures should not be approved.

A rezoning request may be approved only upon determination that the application and evidence presented establish that all the proposed permitted uses are compatible with conforming land uses located on adjacent properties. The Board of County Commissioners shall utilize the following criteria as applicable in the consideration of all rezoning requests.

- 1. A rezoning request shall not be approved if the proposed permitted uses are determined to have an unreasonable incompatible impact on the contiguous and surrounding area in respect to sensory characteristics such as odor, noise, vibration, and lighting, as well as non-sensory characteristics such as pollution and traffic flow.**
- 2. A rezoning request shall not be approved if the proposed traffic flow of the proposed permitted uses have an unreasonable impact on the contiguous and surrounding area, or if the proposed traffic has an unreasonable impact upon the projected wear and tear of any public roadway designed to carry lighter traffic than proposed with the rezoning, or if the proposed traffic results in an unreasonable danger to the safety of other traffic, pedestrians, and bicyclists.**
- 3. A rezoning request shall not be approved if any of the proposed permitted uses or proposed activities results in a public nuisance.**
- 4. A rezoning shall not be approved if it results in urban sprawl characteristics as provided in Florida Administrative Code 9J-5.**
- 5. A rezoning shall not be approved if it unreasonably or unduly impacts the natural environment.**
- 6. With respect to the foregoing, the following factors may be considered as mitigation in order to negate a possible incompatibility:**

- a. permitted uses, structures and activities allowed within the Future Land Use designation;
- b. building location, dimension, height and floor area ratio;
- c. location and extent of parking, access drives, loading areas, and service areas;
- d. hours of operation, noise levels, and lighting;
- e. roads, setbacks, buffers, fences, walls, landscaping, parks and open spaces, wetlands, conservation areas, drainage ponds, lakes, and other similar characteristics.

The Applicant has filed a companion Application for Rezoning to Planned Unit Development which offers the County additional certainty as to the plan of development for the Subject Property. This PUD rezoning demonstrates the community's compatibility with the existing and planned surrounding uses including type of use, density, height, general appearance and aesthetics, traffic generation, and availability of public services. The proposed Residential B future land use designation and the proposed Age-Restricted community, golf course, and ancillary uses are consistent with and compatible with the surrounding area as demonstrated in this Application for Comprehensive Plan Amendment.

The size and scale of the proposed Neighborhood Commercial uses within the North Parcel are to be developed on a human scale in keeping with the Comprehensive Plan's parameters for these uses. The North Parcel is bound on the west and north sides by two major collector roadways, appropriate facilities for servicing commercial properties. To the south, the intended plan of development calls for Age-Restricted residential units, a large conservation area, golf course and community recreation area. The maintenance of development edges will assure that Neighborhood Commercial development does not impede the continued use of the educational facilities to the east of the North Parcel. The unrelated application for comprehensive plan amendment for property adjacent to the North Parcel (ICI Middlebourne, COMPAMD 2016-01) does not propose any uses that would be incompatible with those proposed for the North Parcel.

Future Land Use Element Policy A.1.4.5

All public and private development shall be reviewed for their impact upon designated historic and archaeological resources, as required by the County Land Development Code.

The Applicant completed a Phase I Cultural Resource Assessment Survey of the Subject Property through the services of a professional RPA archaeologist, Heritage Services, Inc. Four sites are addressed in the Survey: a prehistoric site that was previously recorded and three newly found historic sites related to the turpentine industry (one the remnants of a circa 1900 homestead). None of the archaeological and historical sites identified for the Subject Property are significant in terms of National Register of Historic Places eligibility criteria, nor do any of the sites warrant additional archaeological work. It is the opinion of Heritage Services that no cultural resources eligible for the National Register will be impacted by the proposed development. The Survey was submitted to the County and on April 25, 2016 the County's Historic Resources Coordinator issued a letter concurring with the Survey's determinations and finding the archaeological work for this project complete. A copy of the County letter was provided to the County as part of the response to comments dated July 19, 2016.

Future Land Use Element Policy A.1.4.6

If historic or archaeological artifacts are discovered while public or private development is underway, the property owner shall cease development activities for the minimum time necessary and cooperate with appropriate agencies to allow for evaluation of their historic significance.

If any historic resources are encountered during development, they will be reported to the State Division of Historical Resources for determination of any required mitigation.

Future Land Use Element Policy A.1.5.6

The County shall not approve Comprehensive Plan amendments that increase the residential density on the Future Land Use Map within the CHHA.

The proposed amendment will not increase the residential density within the Coastal High Hazard Area because the Subject Property is not anywhere near the CHHA.

Future Land Use Element Policy A.1.6.1

The County shall maintain the Rural/Silviculture (R/S) and Agricultural-Intensive (A-I) as depicted on the Future Land Use Map. Unless determined an Exempt Parcel, pursuant to Policy A.1.6.3, the minimum lot size for residential development within the R/S and A-I designations is as follows: R/S 100 acres, A-I 39 acres. This Policy

shall not be construed to prevent amendments of the Future Land Use Map to redesignate lands presently classified as R/S and A-I pursuant to the requirements of this Plan and applicable law.

The Owner has been using the Subject Property for timber production for many years. The continuation of the historic timber harvesting activities on the Subject Property remains a viable use; however, due to the evolution of development within the Northwest Sector and encroachment of the surrounding residential and commercial developments that abut the Subject Property, the requested Comprehensive Plan Amendment is proposing additional compatible uses to respond to the market and need for additional development in the Northwest Sector.

Future Land Use Element Policy A.1.7.4

The County shall continue to investigate land development regulations, incentives and provisions to promote infill development in those areas which, consistent with the Plan, are appropriate for such development.

The Subject Property is proposed for residential and neighborhood commercial development and promotes infill within an area that is a logical expansion of the County's Development Area Boundary. The proposed residential and neighborhood commercial development associated with this Application for Comprehensive Plan Amendment is consistent and compatible with the existing surrounding uses that are predominantly single-family residential, commercial, recreational and civic uses.

Future Land Use Element Policy A.1.7.5

The County shall continue to investigate land development regulations that promote compact development, discourage urban sprawl and support the efficient use of land and public facilities.

*This Comprehensive Plan Amendment as set forth herein and development of the Subject Property promotes compact development, discourages urban sprawl and supports the efficient use of land and public facilities. In addition, the companion Application for Rezoning to Planned Unit Development provides assurances to the County that the plan of development will promote compact development of an infill location and support the efficient use of land and public facilities. The Generalized Site Plan located within **Part Three** of this Application for Comprehensive Plan Amendment illustrates this compact form allowing for the preservation of contiguous wetland systems.*

Future Land Use Element Policy A.1.8.1

All development orders or development permits for future development or redevelopment activities shall be conditioned on the provision of adequate land to accommodate needed utility facilities.

*The Subject Property will be developed to provide adequate land to accommodate needed utility facilities to support the proposed Age-Restricted Residential neighborhoods and neighborhood commercial uses. Further assurances regarding this provision are provided in the companion Application for Rezoning to Planned Unit Development. No land will be required for use by any new on-site utility facilities. The residential and neighborhood commercial uses will be served by central water, sewer and reclaimed services provided by JEA. Water and sewer availability letters from JEA dated March 9, 2018 and March 27, 2018 are included within **Part Three** of this Application for Comprehensive Plan Amendment.*

Future Land Use Element Policy A.1.8.3

Water and wastewater treatment facilities shall be allowed in the Future Land Use designations as provided in Policy A.1.11.1 and subject to standards and criteria contained in the County land development regulations. The design and construction of such facilities shall protect natural resources and environmentally sensitive areas and shall be adequately buffered from all non-compatible uses.

Please see the immediately preceding response.

Future Land Use Element Policy A.1.11.1(m)

The land use designations, as depicted on the Future Land Use Map, shall permit the following land uses:

Residential shall mean single-family or multi-family dwelling units appropriate to the residential densities as designated on the Future Land Use Map along with uses supportive or complimentary to residential. Permitted uses shall include the following as defined and controlled by the County land development regulations:

Residential uses at the applicable density established by density zone as depicted on the Future Land Use Map and further defined below, together with permitted accessory uses. Nothing in this provision shall be construed to guarantee the achievement of the maximum density for any specific proposed development including the provision of any bonus or incentive that may be applicable pursuant to the Plan. The actual density achieved by a proposed development shall be established and controlled, within the maximums provided by this provision, through the application of applicable Plan policies and implementing land development regulations, and concurrency management regulations. These additional controls may restrict the density of a proposed development to less than the maximum provided for in this provision. Density shall be determined on a site specific basis considering design, compatibility, infrastructure, site characteristics and other similar considerations, which may limit density appropriate to the site.

The Applicant intends to develop the Subject Property as a residential neighborhood containing not more than 818 detached and/or attached Age-Restricted homes and 160,000 square feet of neighborhood commercial uses. Based on the approximately 371 acres of uplands, the resulting residential density will not exceed 2.2 units per developable upland acre. The Applicant has proposed the following site-specific policy as part of this amendment application:

Policy A.1.11.1(m)(8)() *The North Parcel within the Property known as Greenbriar Downs (approximately 55 acres) described in Ordinance No. 2018-__ is assigned the Residential B future land use designation. The development intensity of the North Parcel shall not exceed 160,000 square feet of those non-residential uses and other uses set forth in the Greenbriar Downs PUD. Proposed changes to increase the allowed intensity of the North Parcel within Greenbriar Downs are subject to the provisions of Chapter 163, Florida Statutes.*

The South Parcel within the Property known as Greenbriar Downs (approximately 728 acres) described in Ordinance No. 2018-__ shall be allowed to be developed with a maximum of 818 Age-Restricted Residential attached and detached dwelling units and related uses as set forth in the Greenbriar Downs PUD. Proposed changes to increase the allowed density of the South Parcel within Greenbriar Downs are subject to the provisions of Chapter 163, Florida Statutes.

Future Land Use Element Policy A.1.11.2

Neighborhood and Community Commercial uses provided within Residential Land Use designations as depicted on the Future Land Use Map, and as provided in Future Land Use Element Policy A.1.11.1, may be permitted under the following conditions:

- (a) the development is approved through the Planned Development land development regulations if a rezoning of the property is required to allow Neighborhood or Community Commercial uses;
- (b) the commercial use is provided at a size and scale compatible with the surrounding residential area;
- (c) the proposed development will promote compact commercial centers or districts rather than a strip commercial development pattern, characterized by continuous linear commercial frontage along the roadway;

Notwithstanding A.1.11.2(a) above, in West Augustine, Neighborhood and Community Commercial uses may be provided in Residential Land Use designations as permitted by zoning designation or Overlay District regulations.

The Applicant submitted a companion Application for Rezoning to Planned Unit Development to comply with this Policy. The Generalized Site Plan illustrates a neighborhood commercial node within the southeast quadrant of the intersection of Longleaf Pine Parkway and Veterans Parkway, both roadways being classified as Major Collectors on the Comprehensive Plan's Map 16 (Road Classification). The Neighborhood Commercial uses are proposed to be developed in a compact compatible scale and not a strip development pattern.

Future Land Use Element Policy A.1.11.9

The County shall continue to review and analyze traffic capacity and the extent of needed road network within the Northwest Sector. The County shall review and analyze funding mechanisms from new development and other sources. The County will also identify the strategies that it may employ to address the overall transportation needs of the area, including DRIs and such other sources as impact fees, infrastructure sales tax and the sources listed in Florida Statutes. The County will not be required to commit to any one approach for transportation funding.

The intended plan of development will comply with concurrency requirements as mandated by Section 163.3180, Florida Statutes, including any provisions of the St. Johns County Land Development Code Article XI, Concurrency Management consistent therewith. This may include entering into proportionate share agreements with respect to traffic concurrency, as required by Section 163.3180, Florida Statutes. The Applicant has prepared a Land Development Traffic Assessment (LDTA) and included it as **Part Four** of this Application for Comprehensive Plan Amendment. The Applicant also intends to submit to the County a concurrency application for the South Parcel which will include proposed transportation mitigation that far exceeds any required County project transportation mitigation.

Future Land Use Element Policy A.1.13.1

The character of existing neighborhoods and surrounding areas shall be considered in the approval of land development proposals, as provided in Policy A.1.3.11.

The Greenbriar Downs plan of development is completely compatible with the surrounding approved development patterns and existing neighborhoods (see **Table 1-2**). The Generalized Site Plan found in **Part Three** of this Application for Comprehensive Plan Amendment illustrates a massive greenbelt buffer separating the new WCI residences from those within the Cimarrone Country Club immediately to the east. This buffering or screening is specified in the companion Application for Rezoning to Planned Unit Development (File No. PUD 2016-07).

**Table 1-2
Density and Intensity Compatibility Matrix**

Northwest St. Johns County Residential Communities	Future Land Use Category	Dwelling Units (DU)	Size (acres)	Uplands (acres)	Gross Density (DU/acre)	Net Density (DU/acre)
Aberdeen	RES C	2,018	1,313	791	1.5	2.5
Durbin Crossing	RES B & RES C	2,498	2,047	1,155	1.2	2.2
Julington Creek Plantation	DRI (pre-1990)	6,400	4,150	2,931	1.5	2.2
Oakridge Landing	RES C	196	157	81	1.3	2.4
Julington Lakes	RES B	512	598	256	0.9	2.0
Veterans Parkway	RES C	146	103	58	1.4	2.5
Greenbriar Downs	RES B	818	784	371	1.0	2.2

Future Land Use Element Policy A.1.15.2

Applications requesting amendment to the Comprehensive Plan or Future Land Use Map shall be evaluated based upon criteria which shall include, but not be limited to the following:

- (a) consistency with the Goals, Objectives and Policies of the St. Johns County Comprehensive Plan;**
- (b) consistency with the Northeast Florida Strategic Regional Policy Plan;**
- (c) impacts on public facilities and services;**
- (d) environmental impacts; and**
- (e) compatibility with surrounding areas;**
- (f) the need to modify land uses and development patterns within antiquated subdivisions.**

The Application for Comprehensive Plan Amendment as set forth herein addresses all applicable elements listed above.

Future Land Use Element Policy A.1.20.1

All new development shall use the St. Johns County Greenway, Blueway & Trails Master Plan as a guide in the planning and design of the new development, in providing access and interconnectivity between adjacent lands and within the new development.

The Applicant has reviewed the County's Greenway, Blueway & Trails Master Plan as a guide in the planning and design of this new community. The plan of development's preservation of the southern and eastern extents of the

Subject Property coincides with the Master Plan's greenbelts. No canoe/paddling trails, wildlife crossings, trail destination points, or multi-purpose trails illustrated on the Master Plan traverse the Subject Property. The Applicant intends to provide an interconnected system of sidewalks within the community for use by its residents and guests. The companion Application for Rezoning to Planned Unit Development provides additional detail on the extensive system of greenways proposed within the Subject Property that will include Scenic Edges, Development Edges, upland buffers and open spaces and recreation opportunities.

Future Land Use Element Policy A.1.21.1

St. Johns County shall encourage recruitment of businesses and industries to enhance the County's economic base. Emphasis will be placed on attracting businesses that create new high-wage opportunities for the citizens of St. Johns County.

The proposed Age-Restricted Greenbriar Downs residential neighborhood and non-residential development will be an asset to St. Johns County in providing ample housing for the active adult population and allowing them to reside closer to their families in the Northwest Sector and other parts of the County, thus keeping families within St. Johns County to enjoy different stages of life and continue to contribute to the fabric that binds the community. This development also proposes to provide an additional economic base within the Northwest Sector area with new neighborhood commercial uses.

Future Land Use Element Policy A.2.1.1(a)

The Northwest Sector shall be developed with neighborhoods and communities that are served by commercial support uses, schools, parks and open spaces and civic spaces.

The Generalized Site Plan illustrates the new neighborhood's preservation of large open spaces and its proximity to new Neighborhood Commercial supports uses, Creekside High School, Veterans Park as well as new recreational lands. The proposed plan of development calls for all residential dwellings to be Age-Restricted, prohibiting any permanent resident under the age of 18 and providing a multitude of recreation, including a golf course, within the residential area of the Subject Property.

Future Land Use Element Policy A.2.1.1(b)

The Northwest Sector shall be developed with an orderly compact planned interconnected transportation network with an interconnected network of scenic and development edges and recreational trail system. Commercial support uses may be developed in nodes along intersections of Major Collectors or arterial roadways. Neighborhood Commercial uses may be located on Minor Collector intersections within a nodal pattern. Strip commercial development is prohibited.

The Generalized Site Plan illustrates a commercial node within the southeast quadrant of the intersection of Longleaf Pine Parkway and Veterans Parkway, both roadways being classified as Major Collectors on the Comprehensive Plan's Map 16 (Road Classification). The development of the Neighborhood Commercial portion of the North Parcel is intended to be compact and compatible and not strip development. In addition the requisite scenic and development edges will be provided within the project as development progresses.

Future Land Use Element Policy A.2.1.1(c)

New development or rezoning, which increases the potential density and/or intensity of the sites within the Northwest Sector shall be submitted and reviewed pursuant to the planned development land development regulations, the Northwest Sector Overlay Map and the goals, objectives and policies contained herein.

The Applicant submitted a companion Application for Rezoning to Planned Unit Development to comply with this Policy. As set forth herein, the Application for Comprehensive Plan Amendment is consistent with the Comprehensive Plan, Northwest Sector goals, objectives and policies.

Future Land Use Element Policy A.2.1.1(d)

Priority for mitigation of environmental impact within the Northwest Sector, shall be to enhance connectivity among connected wetlands, recreational areas and parks, scenic edges, development edges and recreational trails within the Northwest Sector. All wetland impacts and subsequent mitigation are subject to compliance with all applicable County, regional, State and Federal permitting requirements.

The Applicant intends to place a conservation easement over the undeveloped wetlands within the Subject Property. The project boundary contributes to the Cunningham, Bowen, and Flora Branch Creek drainage basins and the

placement of the conservation easement will connect the conservation easements placed in the three adjacent drainage basins. The Applicant shall also provide an upland buffer adjacent to contiguous wetlands. Any wetland impacts will be mitigated for pursuant to applicable federal, state and local regulations.

Future Land Use Element Policy A.2.1.1(e)

New development within the Northwest Sector shall use a community planning approach that requires public participation from residents and landowners within the proposed new development's defined community impact area.

As part of both the Comprehensive Plan Amendment and the Application for Rezoning to Planned Unit Development processes, the Applicant will be seeking public comment/input from residents and landowners within the Subject Property's identified community impact area. A community meeting was conducted April 28, 2016. This input was considered and used to shape the plan of development. Another community meeting is tentatively scheduled for the summer of 2018.

Future Land Use Element Policy A.2.1.2(e)

Minor collector and local road networks shall provide multiple travel routes within each planned development and throughout the Northwest Sector. Connectivity shall be provided from neighborhoods to commercial support services. Where feasible, connectivity shall be provided between adjacent neighborhoods through roadways, pedestrian and bicycle paths.

As part of the companion Application for Rezoning to Planned Unit Development, the Applicant is proposing a spine road throughout the residential community. Vehicular and pedestrian interconnection to the future extension of Veterans Parkway and to County Road 210 West will be possible. There are no opportunities for vehicular interconnection to the adjacent developed parcels to the east of the Subject Property. Development of the North Parcel is proposed to provide connectivity to the adjacent school, Longleaf Pine Parkway and Veterans Parkway.

Future Land Use Element Policy A.2.1.2(h)

A roadway network that provides multiple alternate routes between residential communities and commercial services shall be the preferred design option.

As part of the companion rezoning application, the Applicant is proposing vehicular and pedestrian interconnection between the community and County Road 210 West and Veterans Parkway. The network of new roadways in the vicinity of the Subject Property will provide numerous alternative routes for residents of the community to access existing commercial centers along Race Track Road, St. Johns Parkway, Longleaf Pine Parkway, and Greenbriar Road/County Road 210 West.

Future Land Use Element Policy A.2.1.3

Development edges and recreational trail systems provide a foundation of the Northwest Overlay. Development edges and recreational trails provide natural corridors, recreational opportunities, aesthetics, habitat protection and open space, maintain rural character and provide screening from roadways and adjacent development. Development edges and the recreational trail system serve the additional goal of providing edges for communities and neighborhoods.

The Applicant will comply with this policy to provide a network of natural corridors within the community. The companion Application for Rezoning to Planned Unit Development demonstrates that the Applicant will comply with the required Development Edge width. The wetlands surrounding the Subject Property will allow more than the community's boundary to effectively exceed the Development Edge requirement. This buffering or screening is specified in the Application for Rezoning to Planned Unit Development.

Future Land Use Element Policy A.2.1.4(a)

Scenic edges shall be provided to preserve the rural character and preserve and enhance scenic view sheds, such as, scenic vistas, the St. Johns River, natural areas, and agricultural areas within the Sector. The primary purpose of scenic edges is to screen development and designed in a way that creates a natural edge between development and the roadway through the use of a variety of native canopy trees, understory trees, bushes, shrubs, and ground cover. Scenic edges are also an integral part of the development edges and recreational trail system that provide trails, sidewalks, and cart paths. Recreational trails, sidewalks and cart paths may be incorporated into the scenic edge; however, the overall goal of rural character and visual screening shall be met.

Scenic edges shall be provided along all existing arterial depicted on the Northwest Sector Overlay Map, and any newly proposed arterial or major collector road, and shall provide for an average 75 feet in width located outside the road right-of-way. The specific width and extent of these scenic edges shall be determined and identified with the proposed development. The scenic edge shall be in addition to any required right-of-way dedication or reservation.

Breaks in the scenic edge may be allowed in otherwise continuous edges to allow for access and associated entrance features including subdivision signage, and provide view corridors to, parks, scenic areas, and other publicly accessible areas. Commercial properties located adjacent to the scenic edge shall be allowed to maintain visibility to commercial structures, signage and entrance features.

The Applicant will comply with the Comprehensive Plan's scenic edge requirements. The Application for Rezoning to Planned Unit Development demonstrates that the Applicant will comply with the scenic edge width along the South Parcel's frontage along the future extension of Veterans Parkway and County Road 210 West. Likewise, the required scenic edge shall be provided along the North Parcel's frontage along the future extension of Veterans Parkway and Longleaf Pine Parkway. Further, the significant wetland area composing half of the South Parcel is to be preserved and will provide approximately 1,000 feet of natural buffer between the new Age-Restricted Residential community and golf course and single family homes to the east. This significant buffering and screening by existing vegetation will maintain a natural edge that will continue the complete communities of the area as motorists travel along Veterans Parkway, Longleaf Pine Parkway and County Road 210 West.

Future Land Use Element Policy A.2.1.4(b)

Where feasible, a coordinated pedestrian and bicycle system consisting of sidewalks, bike paths or trails and parks shall link Neighborhoods to each other as follows:

- (1) Schools.
- (2) Commercial services.
- (3) Bike paths and sidewalks shall allow for safe non-automobile travel and be integrated into a system of trails to serve both recreation and pedestrian/bicycle travel needs of area residents.
- (4) Sidewalks shall be required on at least one side of all new roads.
- (5) Bike lanes shall be required on both sides of all arterial and major collector roadways unless an alternative path is provided.
- (6) Trails and bikeways should connect to elementary schools. The County shall work with School District to locate elementary and middle schools in close proximity to neighborhoods to encourage walkability.

The planned Age-Restricted Residential neighborhood and non-residential development will provide an interconnected system of sidewalks. The community's internal sidewalk network is proposed to connect to a County sidewalk located along C.R. 210 and Veterans Parkway. This network offers a connection to Creekside High School.

Future Land Use Element Policy A.2.1.6

The Northwest Sector Vision Process identified the need for a Greenway system, including wetlands and uplands, to provide wildlife habitat, recreational opportunities, natural corridors, aesthetics, and open space. The County shall identify funding sources to purchase lands that fall within an identified greenway. As such potential greenway land and funding sources become available the County may purchase these systems or provide tax incentives, transfers of development rights, or perpetual conservation easement to protect them.

New development within the Northwest Sector may contribute land or funding sources to the County to facilitate the creation of the greenway. The Board of County Commissioners may consider incentives in exchange for these lands. Such incentives may include but not limited to additional density, flexible setbacks, transfer of development rights or an accelerated timing and phasing of development.

The eastern portion of the South Parcel is to be preserved and will serve as part of the regional greenway system.

Future Land Use Element Policy A.2.1.7

Proposed Comprehensive Plan amendments, planned development applications, and DRI applications shall provide for community public participation. Following pre-application submittal with the County but prior to the Planning and Zoning Agency and Board of County Commissioners public hearings, new development within the Northwest Sector shall be planned with community public participation comprised of the County, the applicant, existing residents and landowners. Community shall be defined at the time of the pre-application review for the

planned development based upon impacts that may occur to the surrounding area. The boundaries of the community shall be provided within the planned development application.

One or more public community workshops shall be conducted prior to development approval with the residents of the defined community within a public place accessible to the residents and the landowners of the defined community. Such workshops shall be held every six months or prior to the Planning and Zoning Agency hearings, whichever comes first. Property owners within the defined community, St. Johns County Planning Division, St. Johns County Board of County Commissioners, and special interest groups that may operate within the community shall be notified of the workshop in a manner as designated by the County. . A summary of the meeting shall be taken and submitted to St. Johns County prior to setting the application for hearing. A St. Johns County Planning staff employee shall attend the public workshop. The applicant shall pay all costs associated with the community public participation workshop.

The applicant shall present the proposed plan of development for public review, input and comment. The applicant shall present to those in attendance at the public workshop, the location and proposed density/intensity of the proposed development and its estimated impact upon the defined community, schools, parks, open spaces, and community commercial support uses and how these impacts are addressed through the proposed new development. Illustrative examples of preliminary design concepts shall be presented. The applicant shall provide how the new development is integrated into the defined community. Public review, input and comment shall be documented in the workshop summary. All written comments shall be provided with the summary. The summary shall include the name and address of all speakers and their comment.

The Applicant conducted a community meeting to inform the public about the plan of development and received public comment on April 28, 2016. St. Johns County Planning and Zoning Staff attended the meeting. Another community meeting is tentatively scheduled for the summer of 2018.

Future Land Use Element Policy A.2.1.8

An overall goal of the Northwest Sector is to achieve a diverse mixture of residential, retail, office uses and civic uses with appropriate open space and recreational opportunities. The County encourages a minimum ratio of one hundred and twelve (112) square feet of retail and office space and 30 square feet of civic space per dwelling unit as a general overall goal to achieve diversity throughout the Northwest Sector.

*The proposed amendment's addition of 818 dwelling units and 160,000 square feet of non-residential space to the Northwest Sector will not impair the overall goal of achieving 112 square feet of non-residential space per dwelling unit. Taking into account the 818 dwelling units associated with this proposed amendment and rezoning along with recently approved dwelling units from the Julington Lakes PUD (466) and Stone Creek Landing PUD (44) there will be 309 square feet of non-residential space per dwelling unit. A detailed summary of approved development within the Northwest Sector is enumerated in **Table 1-3** on the next two pages. In addition, this project is proposed to consist of attached and detached Age-Restricted units within the South Parcel, which will assist in achieving a diverse mixture of residential uses within the Northwest Sector.*

**Table 1-3
Northwest Sector Development Summary**

Approved PUDs	Res. DU	Non-Res. SF	Approved DRIs	Res. DU	Non-Res. SF
210 Commerce Centre	0	49,900	Aberdeen	2,018	110,000
Anderson Park	120	480,000	Ashford Mills	2,633	280,000
Ashley Oaks	75	0	Bartram Park (w/in County)	367	418,914
Bartram Executive Park	0	46,200	Durbin Crossing	2,498	200,000
Bartram Plantation	145	0	Julington Creek Plantation	6,292	391,950
Bartram Trails	48	0	RiverTown	4,500	500,000
Bartram Walk (East)	0	140,000	Saint Johns	7,200	5,615,000
Boardwalk	12	0	Silverleaf Plantation	10,700	1,770,000
Bridle Ridge	0	70,000	World Commerce Center	1,156	3,507,500
Cimarrone	682	0	Subtotal DRIs	37,364	12,793,364
Cunningham Creek Plantation	660	0			
Flora Branch	0	90,000			
Fruit Cove Shopping Center(Btrm. Walk W)	0	208,080			
Johns Creek	583	246,000	Approved PRDs	Res. DU	Non-Res. SF
Johns Glen	120	0	Bartram Downs	76	0
Julington Lakes	466	0	Breakaway Trails	5	0
Julington Village (Publix)	0	129,716	Colee Cove Landing North	23	0
Liberty Park	296	0	Countryside	24	0
Mill Creek Landing	83	0	Equestrian Way	23	0
North Florida Industrial Park	0	55,000	Golden Eye	6	0
Oak Harbour	98	0	Greenbriar Plantation	19	0
Oakridge Landing	196	12,000	Palmo Creek	69	0
Pacetti Road Plaza	0	32,803			
PalM Lakes (Murabella)	740	120,000	Muellers Landing**	59	0
Plantation, The (Glen St. Johns)	494	0	Osprey Cove Estates	4	0
River Pointe	24	0	River Plantation**	27	0
Roberts Rd PUD (Greenfield)	59	0	Rivertown Riverfront Lots N	29	0
Samara Lakes	872	0	Whitelock Farms	62	0
Shoppes at Mill Creek	0	22,200	Subtotal PRDs	426	0
South Hampton	779	100,000			
Southern Grove	90	0			
Southlake	200	100,000			
St. Johns Forest	545	75,000			
St. Johns Golf & CC	799	0			
Stone Creek Landing	44	0			
Stonehurst Plantation	530	0			
Sunshine 13	159	0			
Sunshine 16	60	168,000			
Villa Sovana	12	0			
Village Commons	0	17,970			
Vinings, The	88	150,000			
Westminster Woods (Wesley Manor)	605	0			
Whisper Ridge	405	0			
Winchester PUD	143	0			
Wingfield Glen	635	0			
Worthington	38	0			
Worthington Park	170	0			
Subtotal PUDs	11,075	2,312,869			

	Res. DU	Non-Res. SF
Developments of Regional Impact	37,364	12,793,364
Planned Unit Developments	11,075	2,312,869
Planned Rural Developments	426	0
Total	48,865	15,106,233
Approved Development	309 SF/DU	
Comprehensive Plan Goal	112 SF/DU	

Northwest Sector Civic Space

Revised 08.19.16

<u>Civic Facility</u>	<u>STRAP</u>	<u>Street Address</u>	<u>Square Feet</u>
Bartram Trail Branch Library	250000 0062	60 Davis Pond Boulevard	15,004
Bartram Trail High School	000710 0030	7399 Longleaf Pine Parkway	314,577
Creekside High School	009831 0000	1937 Longleaf Pine Parkway	242,988
Cunningham Creek Elementary School	009770 0020	1205 Roberts Road	75,805
Durbin Creek Elementary School	249000 7060	4100 Race Track Road	87,495
Fire Station 10 (World Golf Village)	028670 0016	235 Mrabella Parkway	8,182
Fire Station 17 (Sampson)	026430 0030	10001 Cartwheel Bay Avenue	6,432
Fire Station 2 (Switzerland)	003250 0010	1120 Sheefield Road	7,638
Fire Station 3 (Orangedale)	011387 0081	6010 State Road 13 N	7,524
Fire Station 4 (Bakersville)	029310 0011	3400 County Road 208	6,350
Fruit Cove Middle School	005680 0040	3180 Race Track Road	123,398
Julington Creek Elementary School	005675 0000	2316 Race Track Road	100,213
Liberty Pines Academy	023630 0042	10901 Russell Sampson Road	154,487
Mill Creek Elementary School	028210 0000	3720 International Golf Parkway	137,584
Mt. Olive Baptist Church	016330 0000	5800 State Road 13 N	3,546
Northwest County Annex	249000 4007	725 Flora Branch Boulevard	14,023
Pacetti Bay Middle School	028820 1430	245 Meadowlark Lane	160,111
Patriot Oaks Academy	009635 0004	475 Longleaf Pine Parkway	154,000 (Est.)
San Juan del Rio Catholic Church	002750 0000	1718 State Road 13 N	14,768
St. Johns County Convention Center	027010 0030	500 S Legacy Trail	90,183
Switzerland Community Center	003410 0000	2059 State Road 13 N	5,892
Switzerland Point M.S. & Hickory Creek E.S.	000675 0000	777 Greenbriar Road	251,640
Timerlin Creek Elementary School	010011 0010	555 W Pine Tree Lane	105,940
Wards Creek Elementary School	028800 1202	6555 State Road 16	109,927
		Total	2,197,707

NWS Residential DU	48,865
Civic SF/DU (Comp Plan Goal)	30
Civic SF/DU (Existing)	45

Future Land Use Element Policy A.2.1.9(a)

Development shall respect existing development patterns and provide for compatibility, quality and integrity of existing neighborhoods. Screening between neighborhoods shall have a vegetation component. The use of opaque fencing, walls and similar privacy fencing around the perimeter of neighborhoods shall also provide natural vegetation along the outside.

The Greenbriar Downs plan of development is completely compatible with the surrounding approved development patterns and existing neighborhoods (see Table 1-4 below). The Generalized Site Plan found in Part Three of this Application for Comprehensive Plan Amendment illustrates a massive greenbelt buffer separating the new WCI residences from those within the Cimarrone Country Club immediately to the east. In addition, development edges will be provided as required. This buffering or screening is specified in the Application for Rezoning to Planned Unit Development.

**Table 1-4
Density and Intensity Compatibility Matrix**

Northwest St. Johns County Residential Communities	Future Land Use Category	Dwelling Units (DU)	Size (acres)	Uplands (acres)	Gross Density (DU/acre)	Net Density (DU/acre)
Aberdeen	RES C	2,018	1,313	791	1.5	2.5
Durbin Crossing	RES B & RES C	2,498	2,047	1,155	1.2	2.2
Julington Creek Plantation	DRI (pre-1990)	6,400	4,150	2,931	1.5	2.2
Oakridge Landing	RES C	196	157	81	1.3	2.4
Julington Lakes	RES B	512	598	256	0.9	2.0
Veterans Parkway	RES C	146	103	58	1.4	2.5
Greenbriar Downs	RES B	818	784	371	1.0	2.2

Future Land Use Element Policy A.2.1.9(b)

Incompatibilities between existing neighborhoods shall be mitigated through architectural design, development edges and recreational trails, additional landscaping and similar types of screening. Proposed mitigation for neighborhood incompatibility shall be determined by the Board of County Commissioners. The burden of proof shall be upon the applicant to prove to the Board of County Commissioners that the proposed mitigation meets the intent of this policy.

The plan of development will be consistent and compatible with the existing and planned surrounding uses. The Applicant shall meet all scenic edge and development edge requirements to increase compatibility. To demonstrate consistency and compatibility, the Applicant submitted a companion Application for Rezoning to Planned Unit Development (File No. PUID 2016-07) that is being reviewed concurrently with this Application for Comprehensive Plan Amendment. In total, nearly 50% of the total community will be preserved as open space.

Future Land Use Element Policy A.2.1.9(c)

Development shall identify and incorporate into its plans measures to protect rural character, archeological, cultural, and historic sites, when these sites are deemed to be significant by St. Johns County or the State of Florida.

The Applicant completed a Phase I Cultural Resource Assessment Survey of the Subject Property through the services of a professional RPA archaeologist, Heritage Services, Inc. Four sites are addressed in the Survey: a prehistoric site that was previously recorded and three newly found historic sites related to the turpentine industry (one the remnants of a circa 1900 homestead). None of the archaeological and historical sites identified for the Subject Property are significant in terms of National Register of Historic Places eligibility criteria, nor do any of the sites warrant additional archaeological work. It is the opinion of Heritage Services that no cultural resources eligible for the National Register will be impacted by the proposed development. The Survey was submitted to the County and on April 25, 2016 the County's Historic Resources Coordinator issued a letter concurring with the Survey's determinations and finding the archaeological work for this project complete.

Future Land Use Element Policy A.2.1.9(d)

Development shall avoid the creation of urban sprawl and strip development.

The plan of development is emblematic of a compact, contiguous development pattern clustering together all 818 units within upland portions of the Subject Property's South Parcel. In addition, where possible, planned crossings of existing wetland areas will be located to utilize existing trail/logging roads to minimize new wetland impacts.

The Subject Property is proposed for Age-Restricted Residential and neighborhood commercial development and promotes infill within an area that is a logical expansion of the County's Development Area Boundary. The proposed residential and non-residential development associated with this Application for Comprehensive Plan Amendment is consistent and compatible with the existing surrounding uses that are predominantly single-family residential developments. It does not promote a strip commercial development pattern nor is it emblematic of leapfrog development.

Development controls that will discourage urban sprawl are contained in the plan of development (proposed rezoning to PUD). The Applicant will provide an expansive amount of open space in the form of greenbelts, golf course, and buffers. Permissible within these open spaces include pedestrian pathways linking the neighborhoods and the regional road network, Creekside High School and the North Parcel's neighborhood commercial node. The South Parcel will contain an approximately 5.96-acre Community Center with activity-based recreation and may offer, but are not limited to, a pool, fitness facility, multi-level driving range, pickle ball, craft rooms, library, performance space, band shell/gazebo, dining area, and community areas within a short walk from homes. The Applicant wishes to provide open space in the golf course, greenbelts and preserves that concentrates development in more urban and efficient patterns.

The Applicant will utilize large-scale clustering in its definition of neighborhoods and greenbelts by grouping residential pods and framing them with conserved land and golf course. Compact arrangement of these homes, and to a lesser degree Neighborhood Commercial uses, along with the reservation of greenbelts and conservation areas all serve to focus development upon approximately half of the Subject Property. The net residential density will be at least 2.2 units per acre.

Future Land Use Element Policy A.2.1.9(e)

Development shall provide accessible open space in the form of squares, plazas, parks, greens and similar open space design. The extent, scale and size of these open space areas shall be submitted with the development plan. Where possible, areas used as open spaces shall consider the use of existing agricultural or rural silvicultural areas to help maintain the rural character of the sector.

The Applicant submitted a companion Application for Rezoning to Planned Unit Development (File No. PUD 2016-07) that is being reviewed concurrently with this Application for Comprehensive Plan Amendment. The desire is for the amendment and rezoning to be approved by the Board of County Commissioners at the same public hearing. The corresponding Generalized Site Plan illustrates neighborhood recreational elements within the community, and substantial natural separation from adjacent properties by development edges and preservation of contiguous wetlands.

Future Land Use Element Policy A.2.1.9(f)

Residential, commercial, retail, office and other non-residential uses shall be provided in compact centers. Strip development shall be prohibited. Commercial, retail, office and other non-residential uses shall be interconnected with residential areas with vehicular, bike and pedestrian ways to assist in alleviating traffic congestion on other roadways.

Future development of the Subject Property will comply with this Policy, as is provided in the companion Application for Rezoning to Planned Unit Development. The planned Age-Restricted Residential neighborhood will provide an interconnected system of sidewalks. The community's internal sidewalk network will connect to the County's proposed sidewalk network located along County Road 210 West along with future connections to Veterans Parkway connecting the neighborhood to the Neighborhood Commercial and recreational uses to be located on the North Parcel. The proposed amendment calls for neighborhood commercial uses to be in a node at the intersection of two Major Collector roadways, not in a ribbon or strip along any particular road frontage.

Future Land Use Element Policy A.2.1.9(h)

Development shall provide a pedestrian friendly transportation system. Pedestrian sidewalks or bikeways shall be provided.

The proposed Age-Restricted Residential community and non-residential development will provide an interconnected system of sidewalks. The community's internal sidewalk network will connect to the County's proposed sidewalk to be located along County Road 210 West along with future connections to Veterans Parkway and connect the neighborhood commercial and recreation areas in the North Parcel.

Future Land Use Element Policy A.2.1.9(i)

When determined appropriate, development shall provide the location and proposed density/intensity of development of each neighborhood, as well as the demand, location and size of schools, civic sites and parks in accordance with the requirements of these policies.

*As detailed earlier in **Table 1-4**, the proposed density and intensity of Greenbriar Downs is completely compatible and nearly identical to that which exists all around the Subject Property. The proposed Age-Restricted Residential community expressly prohibits any permanent resident 18 years of age or younger, therefore no school-age population will require accommodation by the St. Johns County School District. The project will meet all level of service standards for parks/civic space.*

Future Land Use Element Policy A.2.1.9(j)

Development shall identify major, minor collector roadways and limited access arterial roadways. Interconnectivity within the development and with surrounding development shall be provided.

The planned Age-Restricted Residential neighborhood and non-residential development will connect to the future extension of Veterans Parkway and County Road 210 West. The Neighborhood Commercial node is located at the intersection of Longleaf Pine Parkway and Veterans Parkway, both Major Collector roadways. Interconnectivity with the County's proposed sidewalk network located along County Road 210 West and the future extension of Veterans Parkway as well as the interconnectivity of the Neighborhood Commercial and recreation area in the North Parcel will be provided from the South Parcel.

Future Land Use Element Policy A.2.1.9(k)

Development shall identify bikeways and pedestrian ways. Bikeway and pedestrian interconnectivity within the development and with the surrounding area shall be provided, if feasible.

The planned Age-Restricted Residential neighborhood and non-residential development will provide sidewalk connection to the County's proposed sidewalk network located along County Road 210 West along with future connections to Veterans Parkway.

Future Land Use Element Policy A.2.1.9(m)

Development shall identify existing land uses and prevalent development patterns within and surrounding the proposed development within the defined community.

*Please refer to **Table 1-4** in an earlier response to FLUE Policy A.2.1.9(a).*

Future Land Use Element Policy A.2.1.9(n)

Development shall identify development edges and recreational trails and other environmental features within and surrounding the proposed development within the defined community.

The Applicant has filed a companion Application for Rezoning to Planned Unit Development which specifies the buffering to be provided within the new Age-Restricted residential community and neighborhood commercial node. Due to the extensive wetland systems on the Subject Property, the buffers to be provided, including Scenic and Development Edges, will meet those required by the St. Johns County Land Development Code. The residential community is completely compatible with the homes found within the immediately adjacent neighborhoods. The Applicant intends to utilize existing trail roads as the initial framework of interconnectivity within the Subject Property.

The companion Application for Rezoning to Planned Unit Development details the conservation and protection of nearly all of the Subject Property's contiguous wetland systems. The Age-Restricted residential neighborhood and non-residential development has been designed with nature in order to minimize any impacts to the existing wetland systems.

Future Land Use Element Policy A.2.1.9(o)

Development shall identify the developable land area within the development.

*The Generalized Site Plan found in **Part Three** of this Application for Comprehensive Plan Amendment conceptually depicts the developable land within the Subject Property. The companion Application for Rezoning to Planned Unit Development includes a section describing the composition of the Subject Property.*

Future Land Use Element Policy A.2.1.9(p)

When determined appropriate, Development shall identify public facilities and services available to the area, available capacity and any deficiencies.

*The intended plan of development will comply with concurrency requirements as mandated by Section 163.3180, Florida Statutes, including any provisions of the St. Johns County Land Development Code Article XI, Concurrency Management consistent therewith. This may include entering into a proportionate share agreement with respect to traffic concurrency, as required by Section 163.3180, Florida Statutes. The Applicant has updated a Land Development Traffic Assessment (LDTA) and included it as **Part Four** of this Application for Comprehensive Plan Amendment. In addition, the Applicant intends to submit to the County a concurrency application for the South Parcel in the near term. The proposed Age-Restricted community expressly prohibits any permanent resident 18 years of age or younger, therefore no school-age population will require accommodation by the St. Johns County School District.*

Future Land Use Element Policy A.2.1.9(q)

Development shall use underground utilities unless topography, drainage, or similar constraints cause underground utilities not to be feasible. This includes electric, water, sewer, cable, fiber optics, and phone lines that may be located in the development edges.

All utilities will be located underground within the Subject Property.

Future Land Use Element Policy A.2.1.9(r)

Development shall provide a statement of the community goals and objectives (Vision) consistent with the goals, objectives and policies of the Northwest Sector Overlay and provide how the proposed development meets the intent of the Vision.

The Applicant filed a companion Application for Rezoning to Planned Unit Development which specifies how the development's connectivity, edges, and wetland protection are consistent and meet the intent of the Northwest Sector Overlay's goals, objectives and policies.

The plan of development is emblematic of a compact, contiguous development pattern clustering together all 818 units within the Subject Property's South Parcel. In addition, where possible, planned crossings of existing wetland areas will be located to utilize existing trail/logging roads to minimize new wetland impacts.

The Subject Property is proposed for residential and Neighborhood Commercial development and promotes infill within an area that is a logical expansion of the County's Development Area Boundary. The proposed Age-Restricted Residential and non-residential development associated with this Application for Comprehensive Plan Amendment is consistent and compatible with the existing surrounding uses that are predominantly single-family residential developments. It does not promote a strip commercial development pattern nor is it emblematic of leapfrog development.

Development controls that will discourage urban sprawl are contained in the plan of development (proposed rezoning to PUD). The Applicant will provide an expansive amount of open space in the form of greenbelts, golf course, and buffers. Permissible within these open spaces may include pedestrian pathways linking the neighborhoods, commercial and civic areas and the regional road network, Creekside High School and the North Parcel's Neighborhood Commercial node. The South Parcel recreational uses may offer, but are not limited to, a pool, fitness facility, multi-level driving range, pickle ball, craft rooms, library, performance space, band shell/gazebo, dining area, and community areas within a short walk from homes. The Applicant wishes to provide open space in a golf course, greenbelts and preserves that concentrates development in more urban and efficient patterns.

The Applicant will utilize large-scale clustering in its definition of neighborhoods and greenbelts by grouping residential pods and framing them with conserved land and the golf course. Compact arrangement of these homes, and to a lesser degree neighborhood commercial uses, along with the reservation of greenbelts and conservation areas all

serve to focus development upon approximately half of the Subject Property. The net residential density will be at least 2.2 units per acre.

Future Land Use Element Policy A.2.1.9(s)

Development shall identify the relationship to the surrounding defined community, neighborhoods, and commercial support areas.

Development of the Subject Property will be compatible with the surrounding areas as demonstrated in Table 1-4. The Generalized Site Plan found in Part Three of this Application for Comprehensive Plan Amendment illustrates clustering of residential pods, linkages to neighborhood commercial and recreational elements within the new community, and substantial preservation of open space and natural separation from adjacent properties by development edges and preservation of contiguous wetlands.

Future Land Use Element Policy A.2.1.9(u)

Development shall identify neighborhood support facilities that are projected to be needed to address the impacts of the proposed development, such as but not limited to, traffic circulation, water and wastewater treatment plants, solid waste transfer facilities, fire stations, emergency medical services, police stations, government buildings, libraries, civic/cultural places, public gathering places, parks, and schools.

The plan of development will be consistent and compatible with the existing and planned surrounding uses. To demonstrate consistency and compatibility, the Applicant submitted a companion Application for Rezoning to Planned Unit Development to further demonstrate consistency that is being reviewed concurrently with this Application for Comprehensive Plan Amendment. The desire is for the amendment and rezoning to be approved by the Board of County Commissioners at the same public hearing. The PUD proposes a residential neighborhood consisting of 818 Age-Restricted Residential dwelling units and 160,000 square feet of non-residential space. In total, nearly 50% of the total community will be preserved as open space.

See the response to FLUE Policy A.2.1.9(p) above as to traffic and school facilities. The residential and neighborhood commercial uses will be served by central water, sewer and reclaimed services provided by JEA. Water and sewer availability letters from JEA dated March 9, 2018 and March 27, 2018 are included at the end of Part Three of this Application for Comprehensive Plan Amendment. The proposed residential and non-residential development is less than a five (5) mile driving distance for the emergency responders from Fire Station No. 17 (Sampson) located at 10001 Cartwheel Bay Avenue. As set forth herein, the Subject Property will include public gathering places and parks.

Future Land Use Element Policy A.2.1.10(c)(2)

Each neighborhood shall have a centrally located civic space or public gathering place in the form of a square, green or common area to serve as a focal point of the neighborhood. These civic spaces shall be identifiable through the use of greens, parks, landscape features, and public art.

The Age-Restricted Residential community is planned to have a recreational Community Center as depicted on the Generalized Site Plan that may include, but are not limited to, a pool, fitness facility, multi-level driving range, pickle ball, craft rooms, library, performance space, band shell/gazebo, dining area, and community areas. The Community Center will serve as a civic gathering space for residents within the new community.

Future Land Use Element Policy A.2.1.11(a)

It is recognized that commercial areas, office areas, employment centers and similar non-residential uses are needed to support the livability of the Northwest Sector. Commercial areas, office areas, employment centers and similar nonresidential uses developed within the Northwest Sector shall be designed to provide a unique sense of place through architectural design and a mixture of compatible uses in a compact setting. These areas shall serve as commercial retail and service areas for the residents within the Northwest Sector. Such development shall be designed with respect to compliance with the general overall design concepts established in this Policy to promote a compact unified commercial business district. Strip commercial development is prohibited.

Future development of the Subject Property will comply with this Policy, as provided in the companion Application for Rezoning to Planned Unit Development. The planned Age-Restricted Residential neighborhood will provide an interconnected system of sidewalks. The community's internal sidewalk network will connect to the County's proposed sidewalk network located along County Road 210 West along with future connections to Veterans Parkway connecting the neighborhood to the Neighborhood Commercial and recreational uses to be located on the North Parcel. The

proposed amendment calls for neighborhood commercial uses to be developed in a compact and compatible manner in a node at the intersection of two Major Collector roadways, not in a ribbon or strip along any particular road frontage.

Future Land Use Element Policy A.2.1.11(c)

Non-residential development shall be arranged in a manner that emphasizes human-scale, pedestrian-oriented design with buildings fronting the sidewalk and street, short blocks, wide sidewalks, street furniture and similar requirements.

The proposed development will attract the desired mix of working and shopping uses to the area and provide Neighborhood Commercial uses within the Northwest Sector to allow residents in this area to shop, dine, and recreate without leaving the area, thereby reducing vehicle miles traveled. Development of the North Parcel will meet this Policy.

Future Land Use Element Policy A.2.1.11(d)

Non-residential development shall be oriented to serve the needs of the surrounding neighborhoods. Development parcels shall be accessed from collectors and internal streets not directly from an arterial roadway.

The Generalized Site Plan illustrates a Neighborhood Commercial node within the southeast quadrant of the intersection of Longleaf Pine Parkway and Veterans Parkway, both roadways being classified as Major Collectors on the Comprehensive Plan's Map 16 (Road Classification).

Transportation Element Policy B.1.1.4

The County shall continue to enforce the provisions of the Concurrency Management System. The County shall review and revise the Concurrency Management System as needed.

*The intended plan of development will comply with concurrency requirements as mandated by Section 163.3180, Florida Statutes, including any provisions of the St. Johns County Land Development Code Article XI, Concurrency Management consistent therewith. This may include entering into a proportionate share agreement with respect to traffic concurrency, as required by Section 163.3180, Florida Statutes. The proposed Age-Restricted Residential community expressly prohibits any permanent resident 18 years of age or younger, therefore no school-age population will require accommodation by the St. Johns County School District. The Applicant has updated a Land Development Traffic Assessment (LDTA) and included it as **Part Four** of this Application for Comprehensive Plan Amendment. In addition, the Applicant intends to submit to the County a concurrency application for the South Parcel in the near term.*

Transportation Element Policy B.1.2.5

Land Development Traffic Assessments. To maintain an acceptable Level of Service (LOS) all major developments shall be required to complete a Land Development Traffic Assessment ("LTDA") as part of the development review process as required by the Land Development Regulations (LDRs).

*The Applicant will comply with concurrency requirements as mandated by Section 163.3180, Florida Statutes, including any provisions of the St. Johns County Land Development Code Article XI, Concurrency Management consistent therewith. An updated LDTA is included as **Part Four** of this Application for Comprehensive Plan Amendment.*

Transportation Element Policy B.1.4.2

St. Johns County shall maintain its development review process to identify where proposed development may encroach on future right-of-way requirements. As permitted by applicable law, the County shall negotiate for dedication or reservation of necessary rights-of-way along major transportation corridors.

Based upon the County's GIS mapping database, the Veterans Parkway right-of-way is approximately 130 feet wide. This width is adequate for the ultimate build-out and widening of the road to four lanes, as well as to accommodate the future extensions of Veterans Parkway south to Greenbriar Road/County Road 210 West. The Applicant shall set aside land along the South Parcel's southern perimeter to be used for future right-of-way allowing the widening of County Road 210 West. The width of the reservation for road widening is fifty-five (55) feet and two hundred thirty-six (236) feet for a stormwater management facility (pond). The Applicant shall convey these reservations to the County free of charge and shall receive transportation proportionate share and/or transportation impact fee credit for the donation of any right-of-way for widening C.R. 210 West.

Transportation Element Policy B.1.6.4

Circulation within and between Developments. The County shall, where feasible, ensure that development includes internal automobile circulation, bicycle use, pedestrian movement, multi-purpose greenway trails, including paved and unpaved as appropriate, and other features to minimize the use of the major roadway network; and still make provisions for public road, public bikeway and pedestrian access to the adjoining properties.

As part of the companion Application for Rezoning to Planned Unit Development, the Applicant is proposing a spine road throughout the residential community. Vehicular and pedestrian interconnection to County Road 210 West along with future connections to Veterans Parkway that will connect with the Neighborhood Commercial and recreational uses in the North Parcel will be possible. There are no opportunities for vehicular interconnection to the adjacent development parcels to the east of the Subject Property.

Transportation Element Policy B.1.6.13

The County shall require the use, where feasible, of wildlife crossings or underpasses, designed to permit and encourage the movement of wildlife wherever a road, lane, path or bridge impacts such movement, especially on or over streams, ravines, wetlands, preservation areas and buffers. The crossings shall allow room for wildlife to pass without being interfered with, injured or threatened by vehicular and pedestrian traffic. Crossings and passes should be large enough that high waters do not impair the movement of wildlife.

Crossings will be set at each wetland crossing to permit and encourage the movement of wildlife. They will be based upon the findings in Part Five’s Wildlife and Habitat Assessment Report in conjunction with the St. Johns County Land Development Code’s requirements. Wildlife crossing signs shall be installed before the wetland crossing to notify motorists of the wildlife crossing. Evergreen landscaping may be planted along the forested area to help prevent animals from entering the roadway and to direct animals to the at-grade crossing.

Transportation Element Policy B.1.6.14

The County shall consider Significant Natural Communities as defined in the Land Development Code, Listed Species, wildlife habitat, planned and existing wildlife corridors, and environmentally sensitive areas in planning new roadway corridors to minimize the impacts of roadway construction, traffic flow and maintenance.

Proposed wildlife crossings will be planned and installed consistent with the findings of the detailed habitat assessment for the Subject Property. The assessment was conducted by Environmental Resource Solutions, Inc. and is included as Part Five of this Application for Comprehensive Plan Amendment. All habitats within the Subject Property were evaluated to determine whether any habitats are considered to be “Significant Natural Communities” as defined in the St. Johns County Land Development Code. Based on these field observations, none of the on-site vegetative communities are considered a Significant Natural Community as defined by St. Johns County Land Development Code Section 4.01.07.

Housing Element Policy C.1.7.1

Through the continued implementation of the Plan goals, objectives and policies, along with the Land Development Code, the County shall meet the housing needs of current and future residents.

The proposed Age-Restricted Residential neighborhood and non-residential development will help to meet a need for active adult attached and detached housing within St. Johns County, augmenting the functional mix of housing found in northwest St. Johns County. The proposed

development will attract the desired mix of working and shopping uses to the area and offer new Neighborhood Commercial uses that will serve the Northwest Sector’s resident population and reduce vehicle miles traveled. The County’s resident population is projected to continually increase, nearly doubling by the year 2040.

<u>Year</u>	<u>County Population</u>	<u>Increase from 2015</u>
2015	214,805	-
2020	253,401	38,596 (+18%)
2025	290,898	76,093 (+35%)
2030	324,997	110,192 (+51%)
2035	356,500	141,695 (+66%)
2040	386,098	171,293 (+80%)

Source: University of Florida, Bureau of Economic and Business Research

In addition, the Subject Property is immediately adjacent to lands designated Residential B. Greenbriar Downs' proposed development will provide needed homes and neighborhood commercial uses to meet market demand and respond to community life cycles within the County as other projects are entering their final stages.

Infrastructure Element Policy D.1.1.1

The County shall continue to encourage growth management practices within the Development Areas which promote contiguous, compact development through the availability of utility services.

The Subject Property is in an area that is currently served by utility services and is a logical and orderly expansion of the Development Area Boundary.

Infrastructure Element Policy D.1.1.2

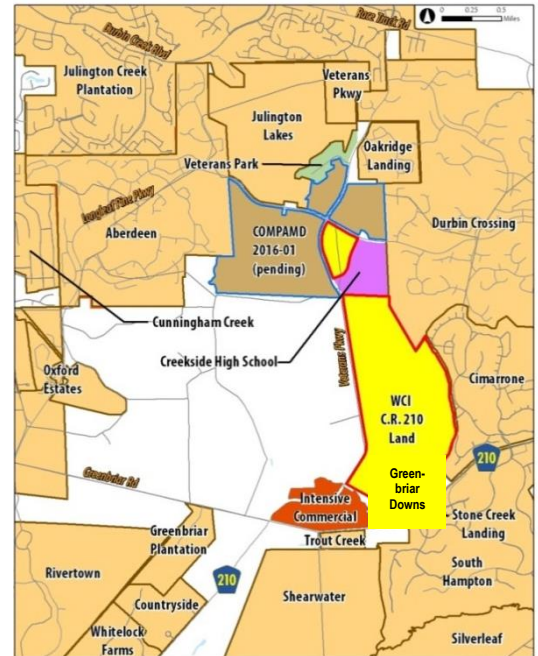
New public infrastructure shall continue to be planned and designed to be compatible with adjacent land uses, both existing and future and shall not promote development located in Environmentally Sensitive Lands (ESLs).

The Greenbriar Downs residential neighborhood and Neighborhood Commercial node planned for the Subject Property has been designed to minimize impacts to wetlands and preserve significant areas of interconnected wetland systems on-site. These interconnected wetland systems will serve as a major natural amenity to the community's residents. In addition, a detailed habitat assessment of the Subject Property was conducted by Environmental Resource Solutions, Inc. and no Significant Natural Communities exist on the Subject Property.

Infrastructure Element Policy D.1.1.3

The County shall continue to direct development within the Development Area Boundaries as designated on the 2025 Future Land Use Map.

As illustrated to the right, the Subject Property is essentially filling in a portion of the Northwest Sector surrounded by the Development Area Boundary. The Subject Property is proposed for residential development and non-residential development which promotes infill within an area that is a logical expansion of the County's Development Area Boundary in an area of the County that contains no additional infill within the existing Development Area Boundary. The proposed development associated with this Application for Comprehensive Plan Amendment is consistent and compatible with the existing surrounding uses that are predominantly single-family residential developments.



Infrastructure Element Objective D.1.3

St. Johns County shall continue to discourage the use of wastewater systems that are package treatment plants; but when necessary, the county shall require the package wastewater treatment systems be constructed to run efficiently and effectively to prevent water degradation, and designed to meet advanced wastewater treatment (AWT) standards including use of treated effluent for use as reclaimed water irrigation.

The Subject Property will not contain any wastewater package treatment plant.

Infrastructure Element Objective D.1.4

The County shall continue to review the use of on-site sewage treatment disposal system (OSTDS) facilities to assure compliance with Federal, State, Regional, and County regulations, and install regional facilities in accordance with the Capital Improvements Element in order to reduce the number of septic tanks installed annually.

Through a companion rezoning to Planned Unit Development (File No. PUD 2016-07), the Applicant prohibits the use of septic tanks within the residential neighborhood in the South Parcel and within the non-residential portion of the North Parcel. Subject to all necessary permitting, septic tanks may be utilized within comfort stations (restrooms) located in the golf course.

Infrastructure Element Policy D.3.1.4

There shall be no reduction in the flood storage capacity or the other natural functions and values of the floodplain in St. Johns County in areas designated as regulatory floodway as updated by FEMA Flood Insurance studies in St. Johns County. Encroachments shall be prohibited within designated regulatory floodway including, but not limited to, fill, new construction and development improvements, that would result in any increase in flood levels.

There are no floodways or proposed floodway encroachments within the project area.

Infrastructure Element Policy D.3.1.5

The County shall regulate development within the flood prone areas to minimize flood storage capacity reduction, so that the post-development conditions does not exceed pre-development conditions and ensure that there will not be any adverse impacts either upstream or downstream which will afford protection of life and property within flood prone areas and/or floodplains.

Development will occur primarily on the upland areas that are above the floodplain elevation designated on the FEMA Flood Insurance Rate Map. The FEMA maps currently denote a flood zone A within portions of the property. During project design, using accurate site specific topography, any proposed fill in the flood zone will be addressed through creation of compensating storage area(s) or demonstration through a detailed analysis that fill, if any, in the flood zone does not adversely impact offsite property owners. There is no floodway within the property.

Infrastructure Element Policy D.3.2.1

New development shall be required to construct adequate stormwater management facilities according to State, Regional and County standards.

The Age-Restricted Residential neighborhood and non-residential development and golf course will contain centralized master stormwater management lakes to manage and treat stormwater on-site in accordance with state, regional, and local standards.

Infrastructure Element Policy D.3.2.3

The County shall require a vegetative buffer between contiguous wetlands and developed areas to protect the water quality of the drainage course as established in the County Land Development Regulations and Policy E.2.2.4 of the Comprehensive Plan.

The residential neighborhood will provide the upland buffers prescribed by the St. Johns County Land Development Code and applicable state regulations to protect water quality within the existing contiguous wetland systems on-site.

Infrastructure Element Policy D.4.1.1

The County shall encourage growth management practices within the Development Areas which promote contiguous, compact development through the availability of utility services.

The residential and neighborhood commercial uses will be served by central water, sewer and reclaimed services provided by JEA. Water and sewer availability letters from JEA dated March 9, 2018 and March 27, 2018 are included at the end of Part Three of this Application for Comprehensive Plan Amendment. The Applicant may utilize septic tanks in the golf course consistent with any necessary permits.

Infrastructure Element Policy D.4.1.7

The County shall, through its Future Land Use Map and Comprehensive Planning activities, direct development to Development Areas, as designated on the 2025 Future Land Use Map, served by existing or planned regional water and sewer facilities.

The residential and neighborhood commercial uses will be served by central water, sewer, and reclaimed utility services from JEA. Part Three of this Application for Comprehensive Plan Amendment includes Water and Sewer Availability Letters from JEA dated March 9, 2018 and March 27, 2018.

Infrastructure Element Objective D.4.5

The County will continue to encourage reduction of per capita water use through the use of water conservation measures, Florida Friendly landscaping and other means.

The Applicant intends to incorporate Low Impact Development (“LID”) principles, where feasible within the residential and neighborhood commercial areas, that may include lowering irrigation uses, using the retention ponds for irrigation water, using native and drought resistant vegetation for landscaping, reduced cleared and filled areas, and leaving most existing vegetated areas undisturbed. The implementation of these LID principles will encourage the reduction of water use within this new community. The specific LID principles implemented will be determined at the Applicant’s discretion at the time of construction plan(s) design.

Infrastructure Element Policy D.4.5.1

The County shall continue to implement its Land Development Regulations to encourage all new development to be designed in accordance with the limitations of the natural environment, and require the conservation of water resources and the use of innovative land development techniques to decrease water use, consistent with Policy E.2.1.6.

The Applicant will utilize large-scale clustering in its definition of neighborhoods and greenbelts by grouping residential pods and framing them with conserved land. Compact arrangement of these homes, and to a lesser degree neighborhood commercial uses, along with the reservation of greenbelts and conservation areas all serve to focus development upon approximately half of the Subject Property. The net residential density will be at least 2.2 units per acre. See also response to Objective D.4.5 above.

Infrastructure Element Objective D.5.2

The County shall coordinate with the St. Johns River Water Management District to ensure the Floridan and Surficial Aquifers Recharge Areas are protected and managed to preserve the quantity and quality of groundwater. Such groundwater sources shall support the present and future County population, proposed economic development opportunities while protecting the County’s natural systems’ needs.

The Subject Property is not within an area determined to be a Floridan or Surficial Aquifer Recharge Area.

Infrastructure Element Policy D.5.3.1

The County shall implement water conservation measures, as designated under Objective D.1.6, of the Sanitary Sewer Sub-element and Objective D.4.5 of the Potable Water Sub-element to protect the surficial aquifer from depletion.

Development of the Subject Property will be consistent with the water conservation measures adopted by St. Johns County and will be more particularly described by the Applicant at the time of construction plan design to protect the surficial aquifer.

Infrastructure Element Policy D.5.5.1

The County’s land development regulations shall encourage all new development to be designed in accordance with the limitations of the natural environment and require the conservation of water resources and the use of innovative land development techniques to decrease water use consistent with Policy E.2.1.6.

The Age-Restricted Residential neighborhood and non-residential development will include water conservation measures that are consistent with those adopted by St. Johns County. This will include using the existing natural vegetation to the greatest extent possible, using native and drought tolerant vegetation for landscaping where feasible, and using the retention ponds for irrigation water. The specific conservation measures to be implemented will be determined at the Applicant’s discretion at the time of construction plan design.

Coastal/Conservation Management Element Policy E.1.3.10

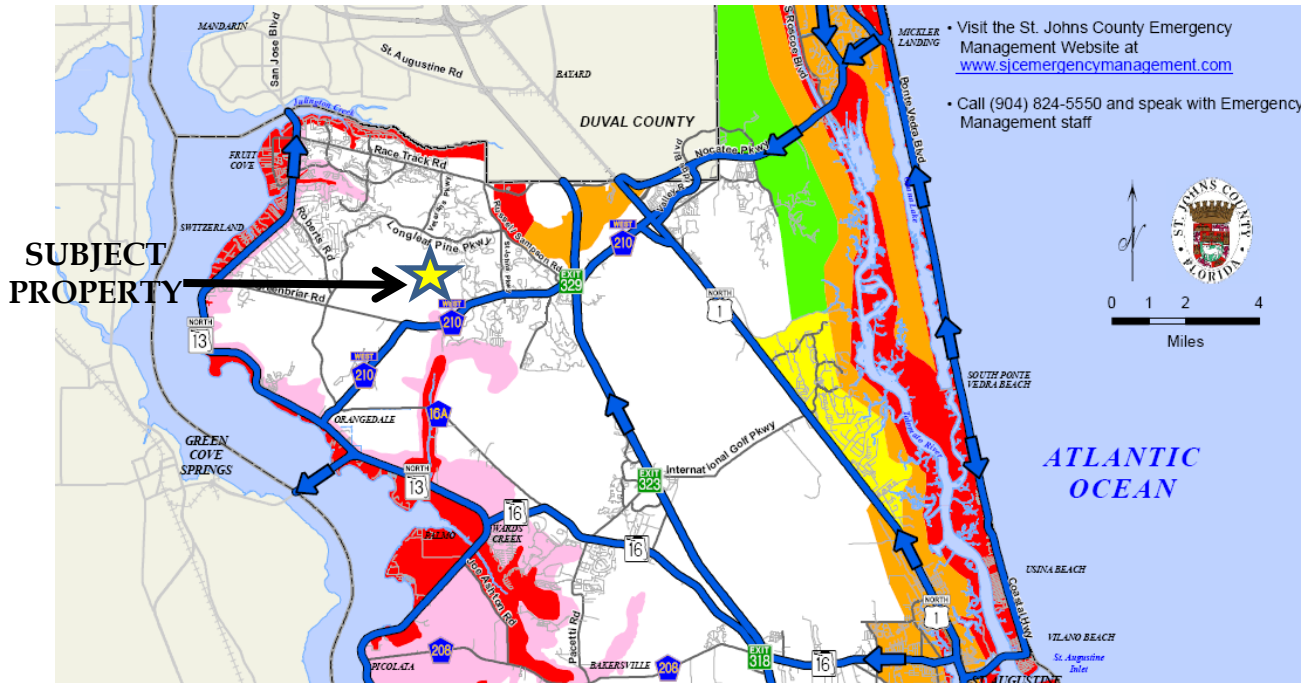
The County shall not approve Comprehensive Plan Amendments that increase the residential density on the Future Land Use Map within the CHHA.

The proposed amendment will not increase the residential density in the Coastal High Hazard Area because the Subject Property is not located anywhere near the Coastal High Hazard Area.

Coastal/Conservation Management Element Policy E.1.3.11

St. Johns County will evaluate development orders for their impacts on traffic circulation, evacuation routes, on-site hurricane shelter provisions and proximity to off-site shelter facilities within the Storm Category Zone 1, 2 and 3.

According to the St. Johns County Storm Tide Atlas Map Index, the Subject Property lies within Plates 98 and 88 and is not located within a hurricane evacuation zone. Subject Property denoted by a yellow star on the map below.



Coastal/Conservation Management Element Policy E.1.3.14

A proposed development in a hurricane evacuation zone which is anticipated to utilize ten percent (10%) or more of an identified hurricane evacuation route's level of service E hourly directional maximum service volume will be identified as having an adverse regional impact. The volume is based on the Florida Department of Transportation's Generalized Hour/Peak Direction Level of Service Maximum Volumes as presented in the Florida Highway Systems Manual. These adverse impacts shall be mitigated.

Please see the immediately preceding response.

Coastal/Conservation Management Element Objective E.1.9

The County shall maintain hurricane evacuation times.

The proposed amendment will not increase the residential density in the Coastal High Hazard Area because the Subject Property is not located anywhere near the Coastal High Hazard Area.

Coastal/Conservation Management Element Policy E.2.1.6

The County shall continue to implement its LDRs that encourage all development to be designed in accordance with the limitations of the natural environment and require the conservation of water resources and use of innovative land development techniques to decrease water use.

The companion Application for Rezoning to Planned Unit Development addresses all Land Development Code requirements for protecting native vegetation, landscaping plantings, irrigation, and flood control. The Applicant intends to incorporate LID principles, where feasible within the residential and neighborhood commercial areas, that may include lowering irrigation uses, using the retention ponds for irrigation water, using native and drought resistant vegetation for landscaping, reduced cleared and filled areas, and leaving most existing vegetated areas undisturbed. The implementation of these LID principles will encourage the reduction of water use within this new community. The specific LID principles implemented will be determined at the Applicant's discretion at the time of construction plan design.

Coastal/Conservation Management Element Policy E.2.2.2

The commercial harvesting of trees shall follow the Florida Department of Agriculture and Consumer Services Best Management Practices (1993), as amended and updated including, but not limited to, providing no harvesting zones within 150 feet of the banks of the St. Johns River and the Intracoastal Waterway, or within 75 feet of the banks of the streams and creeks listed below, whichever is more restrictive.

Any commercial harvesting of trees shall follow the Florida Department of Agriculture and Consumer Services Best Management Practices (1993), as amended and updated.

Coastal/Conservation Management Element Policy E.2.2.3

In order to protect the functional viability and productivity of forested wetland systems as natural resources, silviculture activities within forested wetlands:

- (a) Shall not significantly alter overall wetland community characteristics (i.e. hydrology, topography, plant species diversity, wetland forest composition, canopy cover or average forest age structure).
- (b) Shall not result in the conversion of historical forested wetlands into either upland systems or other types of wetland systems, except pursuant to restorative silviculture activities.
- (c) Shall comply with the ACOE's, DEP's, SJRWMD's, the Department of Agriculture and Consumer Services, and the Division of Forestry's Best Management Practices.

Development of the Property will be consistent with this Policy.

Coastal/Conservation Management Element Policy E.2.2.4(a)(1)(a)

The County shall protect Environmentally Sensitive Lands (ESLs) through the continued implementation of Land Development Regulations (LDRs) which address the alternative types of protection for each type of Environmentally Sensitive Land and, at a minimum, address the following issues:

- (a) For Wetlands, Outstanding Florida Waters (OFW), and Estuaries:
 - (1) Maintain buffers between the wetlands/OFW/ estuaries and upland development as stated in the County's Land Development Regulations (LDRs) and as follows:
 - (a) A minimum natural vegetative upland buffer of twenty-five (25) feet shall be required and maintained between the developed areas and the contiguous wetlands to protect the water quality of the wetlands, except where buffer averaging may allow less than the required minimum of twenty-five (25) feet in certain locations while achieving a greater buffer width or where a variance is granted. Except where a variance is granted, no buffer shall be reduced to less than ten (10) feet except in circumstances where an unavoidable wetland impact occurs such as but not limited to a road crossing. Such upland buffer shall be measured from the jurisdictional wetland line as determined by the SJRWMD and FDEP.

As outlined in the companion Application for Rezoning to Planned Unit Development, the Age-Restricted Residential neighborhood and non-residential development will provide upland buffers to further minimize impacts to conserved wetland areas. These buffers are consistent with this Policy and meet water management district regulations and the St. Johns County Land Development Code.

Coastal/Conservation Management Element Policy E.2.2.6

Environmental surveys shall be required for all development. By December 2012, the County shall develop and adopt in the Land Development Regulations (LDRs) standards for environmental surveys. At a minimum, the focus of these surveys shall be, jurisdictional wetland boundaries, existing vegetative communities, the presence and location of existing wildlife habitat, rookeries, listed species, Significant Natural Communities Habitat, historical and archaeological locations and potential wildlife corridors.

Environmental Resource Solutions, Inc. conducted a wildlife and habitat assessment report for listed species (see Part Five of the Application for Comprehensive Plan Amendment). Based on the findings outlined in the assessment, no Significant Natural Communities exist on the Subject Property and preliminary surveys for listed species concluded that the only listed species observed on the Subject Property is the gopher tortoise. This species is regulated by the Florida Fish and Wildlife Conservation Commission and a 100% gopher tortoise survey will need to be conducted, and permits will need to be obtained, prior to any earthwork activities.

Coastal/Conservation Management Element Policy E.2.2.9(a)

The County shall protect wetlands, uplands and their associated wildlife habitats through the implementation of the Planned Development (PUD and PRD) land development regulations by requiring twenty five (25%) percent preservation of open space. These preservation areas will be designed to complement the Florida Fish and

Wildlife Conservation Commission's (FWC) wildlife and habitat data and the Florida Ecological Greenways Network so that these areas can be interconnected with adjacent ecological areas.

As committed in the companion Application for Rezoning to Planned Unit Development, the Age-Restricted Residential neighborhood and non-residential development will preserve far beyond 25% of the Subject Property and conserve uplands within the significant amount of the upland buffers provided along the conserved wetland systems. The eastern portion of the South Parcel is to be preserved and will serve as part of the regional greenway system.

Coastal/Conservation Management Element Policy E.2.2.9(b)

The County shall protect wetlands, uplands and their associated wildlife habitats through the implementation of natural vegetative upland buffers, the preservation of Significant Natural Communities Habitat and the protection of Listed Species within St. Johns County as provided in the County Land Development Regulations.

*A detailed habitat assessment of the Subject Property was conducted by Environmental Resource Solutions, Inc. and is included as **Part Five** of this Application for Comprehensive Plan Amendment. All habitats within the Subject Property were evaluated to determine whether any habitats are considered to be "Significant Natural Communities" as defined in the St. Johns County Land Development Code. Based on these field observations, none of the on-site vegetative communities are considered a Significant Natural Community as defined by St. Johns County Land Development Code Section 4.01.07. Development of the Subject Property will provide upland buffers per applicable law. See also response to Policy E.2.2.6 above.*

Coastal/Conservation Management Element Policy E.2.2.9(d)

Wetlands and natural functions of the wetlands shall be protected and conserved through the planning process which considers the type, value, function, size, condition and location of the wetlands.

The Age-Restricted Residential neighborhood and non-residential development planned for the Subject Property will be designed to minimize impacts to the existing wetland system. Where wetland impacts are unavoidable, wetland mitigation will be provided in compliance with local, state and federal regulations. Those wetlands that are not impacted will be preserved by conservation easements, as committed in the PUD Master Development Plan. In total, nearly 50% of the Subject Property will remain open space after build-out of the new community.

Coastal/Conservation Management Element Policy E.2.2.11

The County shall implement Land Development Regulation standards and procedures, as provided in Objective D.3.1 and supporting policies, to ensure that stormwater management systems protect the hydrologic conditions of wetlands.

The Age-Restricted Residential neighborhood and non-residential development will be designed with centralized, master stormwater management ponds for treatment of the stormwater runoff generated by the development. The stormwater management system(s) will be designed using the Best Management Practices prescribed by the County and the St. Johns River Water Management District. This stormwater system(s) will be designed to balance pre- and post-flow conditions and avoid wetland dewatering.

Coastal/Conservation Management Element Policy E.2.2.12(a)

St. Johns County shall require a buffer zone adjacent to the wetlands and open water habitats on all new development sites as specified in the LDRs and policy E.2.2.4.

As committed in the companion Application for Rezoning to Planned Unit Development, the Age-Restricted Residential neighborhood and non-residential development will preserve and conserve uplands within the significant amount of the upland buffers provided along the conserved wetland systems.

Coastal/Conservation Management Element Policy E.2.2.12(b)

The County shall recognize the following vegetative natural communities as Significant Natural Communities Habitat. Due to the rarity of these vegetative communities, a minimum of ten (10%) percent of the total acreage of the Significant Natural Communities Habitat (excluding bona fide Agriculture or Silviculture operations) shall be preserved and maintained by the development.

- (1) Beach Dune**
- (2) Coastal Grasslands/Coastal Strand**
- (3) Xeric Hammock**
- (4) Maritime Hammock**

- (5) Sandhill
- (6) Scrub

A detailed habitat assessment of the Subject Property was conducted by Environmental Resource Solutions, Inc. and is included as **Part Five** of this Application for Comprehensive Plan Amendment. All habitats within the Subject Property were evaluated to determine whether any habitats are considered to be "Significant Natural Communities" as defined in the St. Johns County Land Development Code. Based on these field observations, none of the on-site vegetative communities are considered a Significant Natural Community as defined by St. Johns County Land Development Code Section 4.01.07.

Coastal/Conservation Management Element Policy E.2.2.15

The County shall continue to encourage cluster type developments in order to preserve large contiguous areas through implementation of the development review process.

The plan of development is emblematic of a compact, contiguous development pattern clustering together all 818 units within the Subject Property's South Parcel. In addition, where possible, planned crossings of existing wetland areas will be located to utilize existing trail/logging roads to minimize new wetland impacts.

The Subject Property is proposed for residential and Neighborhood Commercial development and promotes infill within an area that is a logical expansion of the County's Development Area Boundary. The proposed residential and non-residential development associated with this Application for Comprehensive Plan Amendment is consistent and compatible with the existing surrounding uses that are predominantly single-family residential developments. It does not promote a strip commercial development pattern nor is it emblematic of leapfrog development.

Development controls that will discourage urban sprawl are contained in the plan of development (proposed rezoning to PUD). The Applicant will provide an expansive amount of open space in the form of the golf course, greenbelts and buffers. Permissible within these open spaces shall be a golf course, pedestrian pathways linking the neighborhoods and the regional road network, Creekside High School and the North Parcel's neighborhood commercial node. The South Parcel will contain an approximately 5.96-acre Community Center with activity-based recreation and may offer, but are not limited to, a pool, fitness facility, multi-level driving range, pickle ball, craft rooms, library, performance space, band shell/gazebo, dining area, and community areas within a short walk from homes. The Applicant wishes to provide open space in a golf course, greenbelts and preserves that concentrates development in more urban and efficient patterns.

The Applicant will utilize large-scale clustering in its definition of neighborhoods and greenbelts by grouping residential pods and framing them with conserved land and the golf course. Compact arrangement of these homes, and to a lesser degree Neighborhood Commercial uses, along with the reservation of greenbelts and conservation areas all serve to focus development upon approximately half of the Subject Property. The net residential density will be at least 2.2 units per acre.

Coastal/Conservation Management Element Policy E.2.3.5

There shall be no reduction in the flood storage capacity or the other natural functions and values of the floodplain in St. Johns County by regulating development in areas designated as regulatory floodway as updated by FEMA Flood Insurance Studies in St. Johns County. Encroachments shall be prohibited within designated regulatory floodway including, but not limited to, fill, new construction, development improvements, that would result in any increase in flood levels.

There are no floodways or proposed floodway encroachments within the project area.

Coastal/Conservation Management Element Policy E.2.3.7

Land uses should be restricted if they adversely affect the quality and quantity of the water resources such as natural groundwater recharge areas, wellhead protection areas and surface waters.

Development of the Subject Property will not adversely affect water quality or quantity.

Coastal/Conservation Management Element Objective E.2.5

Protect the water resources of the County from contamination through the use of centralized water and sewer systems.

The residential and neighborhood commercial areas will be served by central water, sewer and reclaimed services provided by JEA. On-site septic systems, including septic tanks, will be prohibited except for instances where, subject to all necessary permitting, septic tanks may be utilized within comfort stations (restrooms) located in of the golf course.

Coastal/Conservation Management Element Objective E.2.8

The County shall protect habitats and populations of listed species.

Please see the Wildlife and Habitat Assessment provided in **Part Five** of the Application for Comprehensive Plan Amendment. Based on these field observations, none of the on-site vegetative communities are considered a Significant Natural Community as defined by St. Johns County Land Development Code Section 4.01.07. Based on the findings outlined in the assessment, preliminary surveys for listed species concluded that the only listed species observed on the Subject Property is the gopher tortoise. This species is regulated by the Florida Fish and Wildlife Conservation Commission and a 100% gopher tortoise survey will need to be conducted, and permits will need to be obtained, prior to any earthwork activities.

Coastal/Conservation Management Element Policy E.2.8.11

The County shall protect listed species and critical habitats and both shall be evaluated on a site development basis. For developments on property known to support listed species of plants or animals, the developer shall be required to notify the appropriate Federal, State and Regional agencies and the County and must comply with the appropriate guidelines and laws that protect listed species.

Please see the immediately preceding response.

Coastal/Conservation Management Element Policy E.2.9.3

The County shall continue to require applicants for Development approval to investigate and incorporate methods to reduce vehicle traffic such as bikeways, pedestrian ways, public transportation, and other means.

Future development of the Subject Property will comply with this Policy, as provided in the companion Application for Rezoning to Planned Unit Development. The planned Age-Restricted Residential neighborhood and non-residential development will provide an interconnected system of sidewalks. The community's internal sidewalk network will connect to the County's proposed sidewalk network located along County Road 210 West along with future connections to Veterans Parkway and connect the South Parcel's recreation area to that to be found in the North Parcel as well as connect to the neighborhood commercial uses in the North Parcel.

Coastal/Conservation Management Element Policy E.2.10.8

By 2011, the County shall modify the Land Development Code establishing Low Impact Development standards.

The Applicant intends to incorporate LID principles, where feasible within the residential and neighborhood commercial areas, that may include lowering irrigation uses, using reuse water, using native and drought resistant vegetation for landscaping, reduced cleared and filled areas, and leaving most existing vegetated areas undisturbed. The implementation of these LID principles will encourage the reduction of water use within this new community. The specific LID principles implemented will be determined at the Applicant's discretion at the time of construction plan design.

Recreation and Open Space Element Policy F.1.1.1(c)

The County shall improve physical access to parks and recreational sites by requiring new development to provide walk/bike paths to connect its open space and recreational sites to residential areas.

Future development of the Subject Property will comply with this Policy, as provided in the companion Application for Rezoning to Planned Unit Development. The planned Age-Restricted Residential neighborhood and non-residential development will provide an interconnected system of sidewalks. The community's internal sidewalk network will connect to the County's proposed sidewalk network located along County Road 210 West along with future connections to Veterans Parkway and connect the South Parcel's recreation area to that to be found in the North Parcel.

Recreation and Open Space Element Policy F.1.3.1

The County minimum level of service (LOS) standard for the provision of parks and open space as follows:

As outlined in the companion Application for Rezoning to Planned Unit Development, the new community will include parks and recreational amenities within the neighborhood that will meet the requirements of the St. Johns County Land Development Code. As such, the development will comply with the adopted Level of Service standards for public infrastructure consistent with Section 163.3180, Florida Statutes.

Recreation and Open Space Element Policy F.1.3.8

Developments of Regional Impact (DRIs), Planned Developments (PUDs), PRDs) and other developments shall provide neighborhood-sized parks and playing fields within the development for their residents that meet the County LOS standard.

As outlined in the companion Application for Rezoning to Planned Unit Development, the new community will include parks and recreational amenities within the neighborhood that will meet the requirements of the St. Johns County Land Development Code. As such, the development will comply with the adopted Level of Service standards for public infrastructure consistent with Section 163.3180, Florida Statutes. The Generalized Site Plan contained within **Part Three** of this Application for Comprehensive Plan Amendment illustrates conceptual locations of a Community Center at the center of the South Parcel with the other recreation area adjacent to Creekside High School within the North Parcel. The active senior population that will reside within Greenbriar Downs will not have children residing with them, thus new multi-purpose, baseball, and football fields are inappropriate recreation uses within the South Parcel.

Recreation and Open Space Element Policy F.1.3.15

The County shall consider the use of wetlands and conservation areas for passive recreational and open space areas, provided these sites have been determined to not endanger public health, safety, and welfare.

The Applicant filed a companion Application for Rezoning to Planned Unit Development which specifies the buffering to be provided within the new residential community and Neighborhood Commercial node. Due to the extensive wetland systems on the Subject Property, the buffers to be provided, including Scenic and Development Edges, will meet those required by the St. Johns County Land Development Code. The Age-Restricted Residential community is completely compatible with the homes found within the immediately adjacent neighborhoods. The Applicant intends to utilize existing trail roads as the initial framework of interconnectivity within the Subject Property.

Capital Improvements Element Objective H.1.2

The County shall adopt Level of Service (LOS) standards to measure the adequacy of public facilities and services.

Development of the Subject Property will comply with the applicable level of service standards. As such, the development will comply with the County's adopted Level of Service standards for public infrastructure consistent with Section 163.3180, Florida Statutes.

Capital Improvements Element Objective H.1.5

The County shall maintain a Concurrency Management System ("CMS") as part of the County's land development regulations which shall ensure that the impacts resulting from the County's issuance of development orders or development permits shall not result in a reduction in a level of service for affected public facilities below the applicable level of service standards established in Policy H.1.2.1 of this Plan.

The intended plan of development will comply with concurrency requirements as mandated by Section 163.3180, Florida Statutes, including any provisions of the St. Johns County Land Development Code Article XI, Concurrency Management consistent therewith. This may include entering into proportionate share agreements with respect to traffic concurrency, as required by Section 163.3180, Florida Statutes. The proposed Age-Restricted Residential community expressly prohibits any permanent resident 18 years of age or younger, therefore no school-age population will require accommodation by the St. Johns County School District.

Capital Improvements Element Objective H.1.6

Consistently with applicable law, the County shall require that future development pay a proportionate cost of facility improvements needed as a result of that development in order to maintain adopted LOS standards.

Development of the Subject Property will be subject to all applicable County impact fees except school impact fees. Should additional mitigation be required for infrastructure, the mitigation will be stipulated as part of a Proportionate Fair Share Agreement.

Capital Improvements Element Objective H.1.8

Future development in St. Johns County shall pay its fair share cost of new infrastructure.

Development of the Subject Property will be subject to all applicable County impact fees except school impact fees.

CONSISTENCY WITH STRATEGIC REGIONAL POLICY PLAN

An update to *Strategic Directions: The Northeast Florida Strategic Regional Policy Plan* (SRPP) was adopted on January 16, 2014. The SRPP serves as a guidebook on coordinated steps to achieve the regional goals included in First Coast Vision. It is a reference guide and data source on most facets of life in the region. The SRPP is organized around strategic subject areas that are in turn related to the priorities of the State of Florida and the mission of the Northeast Florida Regional Council.

The Applicant has reviewed the SRPP for consistency in project approach and intent. Although the SRPP is directed more towards regional and/or municipal level guidance, there are several elements of the Plan that can be applied or have been proposed as part of the proposed land use amendment and companion Application for Rezoning to Planned Unit Development.

This section references numerous regional Policies contained within the SRPP. The Policies relevant to the proposed amendment are identified in bold type followed by italicized information addressing how the proposed amendment is consistent or otherwise supports each SRPP Policy.

The County's resident population is projected to continually increase, nearly doubling by the year 2040.

<u>Year</u>	<u>County Population</u>	<u>Increase from 2015</u>
2015	214,805	-
2020	253,401	38,596 (+18%)
2025	290,898	76,093 (+35%)
2030	324,997	110,192 (+51%)
2035	356,500	141,695 (+66%)
2040	386,098	171,293 (+80%)

Source: University of Florida, Bureau of Economic and Business Research

* * * * *

Demographics and Equity Policy 2

The Region will support its local governments and share best practices as they develop ways to gather public input from citizens in all parts of the Region.

As part of the Comprehensive Plan Amendment and the Application for Rezoning to Planned Unit Development processes, the Applicant will be seeking public comment/input from residents and landowners within the Subject Property's identified community impact area. A community meeting was conducted April 28, 2016. This input was considered and used to shape the plan of development. Another community meeting is tentatively scheduled for the summer of 2018.

Demographics and Equity Policy 4

Non-compact development patterns and limited mobility options are a barrier to success for all, and have a greater impact on low-income residents, seniors and those with disabilities or health challenges. The Region supports more compact development connected by transportation corridors.

The plan of development is emblematic of a compact, contiguous development pattern clustering together all 818 units within the Subject Property's upland portions. In addition, where possible, planned crossings of existing wetland areas will be located to utilize existing trail/logging roads to minimize new wetland impacts.

The Subject Property is proposed for residential development and non-residential development which promotes infill within an area that is a logical expansion of the County's Development Area Boundary. The proposed development associated with this Application for Comprehensive Plan Amendment is consistent and compatible with the existing surrounding uses that are predominantly single-family residential developments. The internal network of sidewalks will connect to the regional system of sidewalks to increase mobility options.

Future development of the Subject Property will comply with this Policy, as provided in the companion Application for Rezoning to Planned Unit Development. The planned Age-Restricted Residential neighborhood and non-residential development will provide an interconnected system of sidewalks. The community's internal sidewalk network within the South Parcel will connect to the County's proposed sidewalk network located along County Road 210 West along with future connections to Veterans Parkway and connect the South Parcel's recreation area to that to be found in the North Parcel as well as connect to the neighborhood commercial uses in the North Parcel.

Communities and Affordable Housing Policy 6

The Region encourages the creation of housing and supportive infrastructure for all of our citizens, including our aging population, veterans, and those with special needs. When such development is designed, it recognizes the linkage between the location of these facilities, access to mobility options and community building that ensures that these facilities are part of the community and not isolated from it.

The proposed Age-Restricted Residential neighborhood and non-residential development will help to meet a demand for new Age-Restricted housing within St. Johns County, augmenting the functional mix of housing found in northwest St. Johns County. The proposed development will attract the desired mix of working and shopping uses to the area and provide neighborhood commercial uses within the Northwest Sector to allow residents in this area to shop, dine, and recreate without leaving the area, thereby reducing vehicle miles traveled and providing units for active adults in an interconnected community. A Community Center is proposed within the Age-Restricted development.

Communities and Affordable Housing Policy 8

The Region values the availability of lifestyle and livelihood choice, including agricultural, rural, suburban and urban.

The proposed Age-Restricted Residential neighborhood and non-residential development will help to meet a demand for Age-Restricted attached and detached housing within St. Johns County, augmenting the functional mix of housing found in northwest St. Johns County. Public services are immediately available adjacent to the Subject Property and there is available capacity to support the plan of development.

Communities and Affordable Housing Policy 12

NEFRC considers impacts to resources of regional significance and extra jurisdictional impacts as it reviews consistency with the SRPP. Local governments and proposers of projects should include best available data gathered using professionally acceptable methodology in support of their proposals, sufficient to determine impacts. Where mitigation is proposed, using strategies outlined in local government policies or plans, the SRPP or a combination is encouraged.

The intended plan of development will comply with concurrency requirements as mandated by Section 163.3180, Florida Statutes, including any provisions of the St. Johns County Land Development Code Article XI, Concurrency Management consistent therewith. This may include entering into a proportionate share agreement with respect to traffic concurrency, as required by Section 163.3180, Florida Statutes. The Applicant has prepared a Land Development Traffic Assessment (LDTA) and included it as **Part Four** of this Application for Comprehensive Plan Amendment. The proposed Age-Restricted Residential community expressly prohibits any permanent resident 18 years of age or younger, therefore no school-age population will require accommodation by the St. Johns County School District.

Emergency Preparedness and Resiliency Policy 23

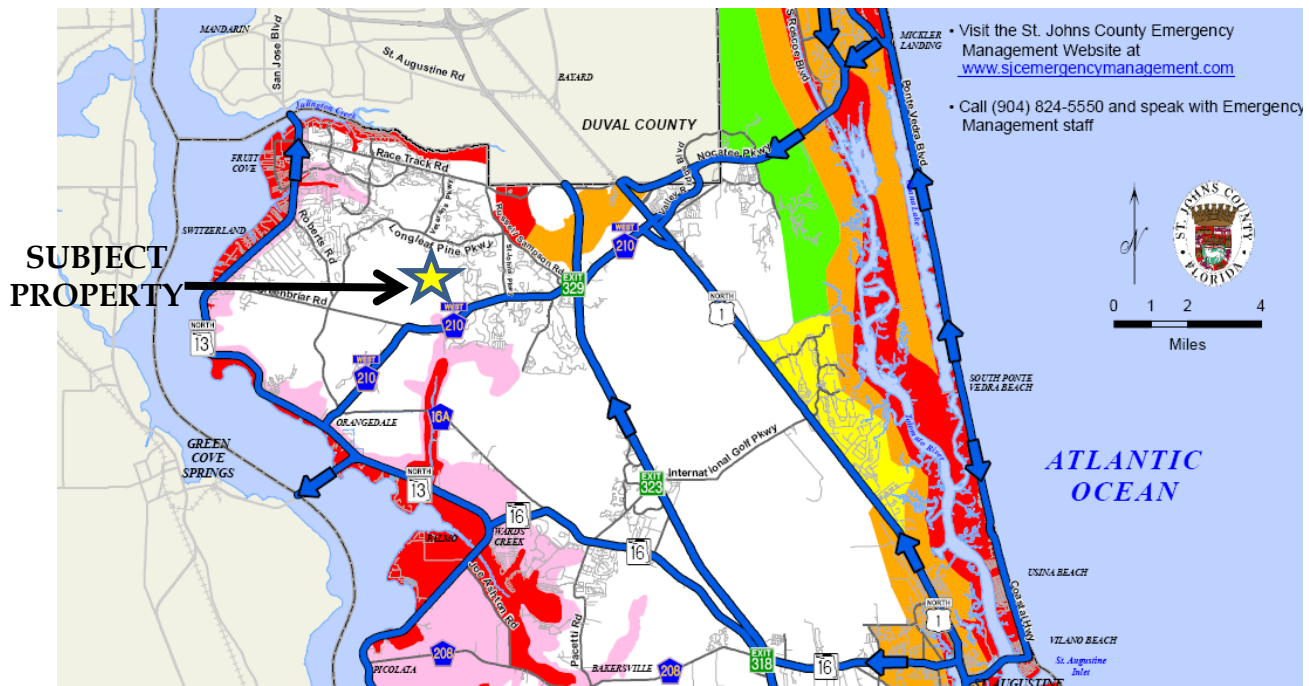
The Region supports limiting new construction, rebuilding, and renovation in the most vulnerable areas as identified by the vulnerability maps.

According to the St. Johns County Storm Tide Atlas Map Index, the Subject Property lies within Plates 98 and 88 and is not located within a hurricane evacuation zone. The proposed amendment will not increase the residential density within the Coastal High Hazard Area because the Subject Property is not anywhere near the CHHA.

Emergency Preparedness and Resiliency Policy 24

The Region supports directing development away from areas anticipated to be most vulnerable to hazards. Where growth within vulnerable areas occurs, the Region encourages concurrent mitigation for those impacts. NEFRC will work with local governments on mitigation strategies to the extent they plan to add residential units in the Coastal High Hazard Area to ensure the mitigation addresses vulnerabilities.

The proposed amendment will not increase the residential density within the Coastal High Hazard Area because the Subject Property is not anywhere near the CHHA. Subject Property denoted by a yellow star on the map below.



Energy Policy 14

NEFRC supports the use of the Energy Star program and appliances that are energy efficient or other water and energy saving programs.

The Applicant will encourage the use of Energy Star appliances within the new Age-Restricted Residential neighborhood.

Regional Health Policy 8

Encourage developers and local governments to promote mixed-use communities that provide alternative forms of transportation, such as sidewalks, bike paths, and transit stops in locations with highest density.

The planned Age-Restricted Residential neighborhood and non-residential development will provide an interconnected system of sidewalks. The community's internal sidewalk network within the South Parcel will connect to the County's proposed sidewalk network located along County Road 210 West along with future connections to Veterans Parkway.

Regional Health Policy 12

Support a Regional transit system, transit-oriented development, and more compact development patterns to reduce vehicle miles traveled and reduce the Regional carbon footprint.

While the Subject Property lies adjacent to the County's Development Area Boundary today, it represents a logical and orderly expansion of the Development Area Boundary, quite similarly to amendments expanding the boundary for Julington Lakes (COMPAMD 2013-07) and Stone Creek Landing (COMPAMD 2014-01). A similar one for Veterans Parkway (COMPAMD 2015-02) was adopted by the Board of County Commissioners on February 2, 2016. COMPAMD 2016-01, an unrelated but adjacent application, is presently under review. The companion Application for Rezoning to Planned Unit Development includes substantial preservation of wetlands covering the eastern half the Subject Property. In addition, public services, including water, sewer, reclaimed, and electricity are immediately adjacent to the Subject Property. The Subject Property is proximate to Veterans Park, a major regional park owned and maintained by St. Johns County is proposing to provide more than 10 acres of recreation space.

The planned Age-Restricted Residential neighborhood and non-residential development will provide an interconnected system of sidewalks. The community's internal sidewalk network within the South Parcel will connect to the County's proposed sidewalk network located along County Road 210 West along with future connections to Veterans Parkway.

Regional Health Policy 14

Support innovations in storm water treatment and overall reductions in storm water runoff.

The Age-Restricted Residential neighborhood and non-residential development will be designed with a master storm water management system(s) for treatment of runoff generated by the development. This storm water management system(s) will be designed using the Best Management Practices prescribed by St. Johns County and the St. Johns River Water Management District. This system(s) will also be designed to adhere to all applicable regulatory criteria in order to protect water quality. Moreover, the storm water system(s) will be designed to balance pre- and post-flow conditions and avoid wetland dewatering.

Regional Health Policy 15

Support water conservation measures, including the elimination of potable water as an irrigation source and "Florida Friendly" landscaping requirements, to reduce demand on the Floridan aquifer and reduce nutrient pollution in waterways.

The residential and neighborhood commercial areas will be served by JEA and is within their reuse service area. Reuse piping will be installed in the development as required by JEA and reuse water, so long as provided by JEA, shall be used for irrigation purposes of common areas, individual lots and the golf course.

Regional Health Policy 18

Use park design and community design to ensure that recreation areas are accessible to all residents, and provide mobility and programmatic options so all residents can get to recreation areas without the use of a personal vehicle.

The Age-Restricted Residential community is planned to have a Community Center within the South Parcel that may include a clubhouse with a pool. The Community Center will serve as a civic gathering space for residents within the community. The North Parcel will have a large recreation area accessible to the public and will be connected to the South Parcel by the sidewalk network to be developed with the future extension of Veterans Parkway.

Natural Resources of Regional Significance Policy 8

The Region supports preservation of ecosystem services for clean, air, water, habitat for wildlife populations, and flood control.

The companion Application for Rezoning to Planned Unit Development details the conservation and protection of nearly half the Subject Property which contains contiguous wetland systems. The Age-Restricted Residential neighborhood and non-residential development has been designed with nature in order to minimize any impacts to the existing wetland systems.

Natural Resources of Regional Significance Policy 9

The Region supports maintaining forest cover and tree canopy.

Please see preceding response.

Natural Resources of Regional Significance Policy 18

The NEFRC supports local government efforts to reduce impervious surfaces, encourage infill and redevelopment, and use low impact development practices in the Region.

The Subject Property is located in a rapidly growing area of St. Johns County that can accommodate community residential units that are designed with nature. The project's infill location, being surrounded by existing and planned single-family residential and neighborhood commercial development, is a logical location for expansion of the Development Area Boundary. In addition, the residential and neighborhood commercial areas will be serviced by existing public services to support the development that include water, wastewater, reclaimed, and electric services. The Applicant has taken great care in designing the Subject Property to minimize impacts to the environment. As depicted on the Generalized Site Plan, the Applicant will take care to develop around the existing system of contiguous wetlands on the Subject Property enabling them to frame the development as natural buffers to provide the residents with a strong sense of natural separation from the surrounding suburban environment.

The Applicant intends to incorporate LID principles, where feasible within residential and neighborhood commercial areas, that may include lowering irrigation uses, using the retention ponds for irrigation water, using native and drought resistant vegetation for landscaping, reduced cleared and filled areas, and leaving most existing vegetated areas undisturbed. The implementation of these LID principles will encourage the reduction of water use within this new community. The specific LID principles implemented will be determined at the Applicant's discretion at the time of construction plan design.

Natural Resources of Regional Significance Policy 23

The Region supports protection of the populations of threatened, endangered and listed species, and will comply with the requirements of federal and state law in decision making regarding species, habitats, and natural systems.

A detailed habitat assessment of the Subject Property was conducted by Environmental Resource Solutions, Inc. The assessment is included as **Part Five** of this Application for Comprehensive Plan Amendment. All habitats within the Subject Property were evaluated to determine whether any habitats are considered to be "Significant Natural Communities" as defined in the St. Johns County Land Development Code. Based on these field observations, no Significant Natural Communities exist on the Subject Property. Based on the findings outlined in the assessment, preliminary surveys for listed species concluded that the only listed species observed on the Subject Property is the gopher tortoise. This species is regulated by the Florida Fish and Wildlife Conservation Commission and a 100% gopher tortoise survey will need to be conducted, and permits will need to be obtained, prior to any earthwork activities.

Natural Resources of Regional Significance Policy 30

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

- **Reduction of discharge of nutrients and pollutants into surface and groundwater.**
- **Elimination of failing septic tanks.**
- **Reduction of new septic tank installations.**
- **Expansion and improvement of data collection and evaluation for water quality through better coordination among agencies.**
- **Protection of functioning wetlands.**
- **Maintenance of riparian and wetland buffers.**
- **Purchase of land and wetlands for water conservation purposes.**
- **Development of a uniform wetland database to measure loss/gain of wetland function.**

The proposed amendment will provide protection of a majority of the contiguous wetland system located within the Subject Property which will benefit the regional drainage system, maintain the important functions of the regional wetland systems, and maintain natural habitats for wildlife. The residential and neighborhood commercial uses will be

served by centralized utilities. The Applicant's possible use of septic tanks within the golf course is needed due to the remote location of the golf course in comparison with the rest of the Subject Property and is extremely limited and does not propose a large influx for septic tank installations. Any septic tank(s) used within the golf course in the Subject Property will be subject to obtaining all necessary permits, which will help ensure that the septic system(s) will not adversely affect the public health or significantly degrade the groundwater or surface water.

CONSISTENCY WITH STATE COMPREHENSIVE PLAN

An analysis of this proposed amendment including consistency with the State Comprehensive Plan as embodied in Section 187.201, Florida Statutes is provided below.

* * * * *

Sec. 187.201(7)(b)(5), F.S.

Ensure that new development is compatible with existing local and regional water supplies.

The residential and neighborhood commercial areas will be served by central water, sewer, and reclaimed utility services from JEA. Part Three of this Application for Comprehensive Plan Amendment includes Water and Sewer Availability Letters from JEA dated March 9, 2018 and March 27, 2018.

Sec. 187.201(7)(b)(10), F.S.

Protect surface and groundwater quality and quantity in the state.

The Age-Restricted Residential neighborhood and non-residential development will be designed with master storm water management lake(s) for treatment of runoff generated by the development. This storm water management system(s) will be designed using the Best Management Practices prescribed by St. Johns County and the St. Johns River Water Management District. This system(s) will also be designed to adhere to all applicable regulatory criteria in order to protect water quality. Moreover, the storm water system(s) will be designed to balance pre- and post-flow conditions and avoid wetland dewatering.

Sec. 187.201(7)(b)(11), F.S.

Promote water conservation as an integral part of water management programs as well as the use and reuse of water of the lowest acceptable quality for the purposes intended.

The Applicant intends to incorporate LID principles within residential and neighborhood commercial areas, where feasible, that may include lowering irrigation uses, using the retention ponds for irrigation water, using native and drought resistant vegetation for landscaping, reduced cleared and filled areas, and leaving most existing vegetated areas undisturbed. The implementation of these LID principles will encourage the reduction of water use within this new community. The specific LID principles implemented will be determined at the Applicant's discretion at the time of construction plan design. Such use of LID principles will encourage the reduction of water use within the new subdivision.

Sec. 187.201(7)(b)(12), F.S.

Eliminate the discharge of inadequately treated wastewater and storm water runoff into the waters of the state.

The Subject Property will not involve any wastewater discharge into waters of the state. Stormwater runoff will be collected in the management system(s) whose design will be in compliance with federal, state and local design criteria.

Sec. 187.201(9)(b)(3), F.S.

Prohibit the destruction of endangered species and protect their habitats.

A detailed habitat assessment of the Subject Property was conducted by Environmental Resource Solutions, Inc.. This assessment is included as Part Five of this Application for Comprehensive Plan Amendment. All habitats within the Subject Property were evaluated to determine whether any habitats are considered to be "Significant Natural Communities" as defined in the St. Johns County Land Development Code. Based on the findings outlined in the assessment, none of the on-site vegetative communities are considered a Significant Natural Community as defined by St. Johns County Land Development Code Section 4.01.07. Based on the findings outlined in the assessment,

preliminary surveys for listed species concluded that the only listed species observed on the Subject Property is the gopher tortoise. This species is regulated by the Florida Fish and Wildlife Conservation Commission and a 100% gopher tortoise survey will need to be conducted, and permits will need to be obtained, prior to any earthwork activities.

Sec. 187.201(9)(b)(7), F.S.

Protect and restore the ecological functions of wetlands systems to ensure their long-term environmental, economic, and recreational value.

The companion Application for Rezoning to Planned Unit Development details the conservation and protection of nearly half the Subject Property which contains contiguous wetland systems and the Generalized Site Plan depicts these areas. The Age-Restricted Residential neighborhood and non-residential development has been designed with nature in order to minimize any impacts to the existing wetland systems.

Sec. 187.201(10)(b)(2), F.S.

Ensure that developments and transportation systems are consistent with the maintenance of optimum air quality.

The development of the Subject Property will be consistent with this Section. There are no industrial uses proposed as a part of the plan of development, nor are there any other uses proposed that would likely involve impacts to air quality. The Age-Restricted population tends not to drive during peak hours and generates far fewer vehicle trips than a conventional subdivision.

Sec. 187.201(15)(b)(1), F.S.

Promote state programs, investments, and development and redevelopment activities which encourage efficient development and occur in areas which will have the capacity to service new population and commerce.

The proposed Age-Restricted Residential neighborhood and non-residential development is ideally situated as an infill development within northwest St. Johns County. Public services are immediately available adjacent to the Subject Property and there is available capacity to support the plan of development. The project will have the capacity to serve the growing aging population within the Northwest Sector, provide an Age-Restricted community in the Northwest Sector to allow active adults to continue to live independently while remaining close to their families and provide additional neighborhood commercial uses within this area.

Sec. 187.201(15)(b)(3), F.S.

Enhance the livability and character of urban areas through the encouragement of an attractive and functional mix of living, working, shopping, and recreational activities.

The proposed Age-Restricted Residential neighborhood and non-residential development will help to meet a need for Age-Restricted housing within St. Johns County, augmenting the functional mix of housing found in northwest St. Johns County. The proposed development will attract the desired mix of working and shopping uses to the area and offer new neighborhood commercial that will serve the Northwest Sector's resident population and reduce vehicle miles traveled.

Sec. 187.201(15)(b)(6), F.S.

Consider, in land use planning and regulation, the impact of land use on water quality and quantity; the availability of land, water, and other natural resources to meet demands; and the potential for flooding.

Development of the Subject Property will be completed in a manner that will protect the water supply and floodplains, and protect the majority of natural areas from additional development as mentioned above, and as further outlined in the companion Application for Rezoning to Planned Unit Development.

Sec. 187.201(17)(b)(1), F.S.

Provide incentives for developing land in a way that maximizes the uses of existing public facilities.

The Subject Property is immediately adjacent to existing water, sewer, reclaimed and electric utility infrastructure. The Subject Property is situated between a portion of Race Track Road (that is currently being widened) and Greenbriar Road/County Road 210 West, therefore the proposed amendment helps to maximize the use of the County's investments in public infrastructure that are readily available today to support development of the plan of development.

Sec. 187.201(18)(b)(6), F.S.

Ensure that historic resources are taken into consideration in the planning of all capital programs and projects at all levels of government and that such programs and projects are carried out in a manner which recognizes the preservation of historic resources.

The Applicant completed a Phase I Cultural Resource Assessment Survey of the Subject Property through the services of a professional RPA archaeologist, Heritage Services, Inc. Four sites are addressed in the Survey: a prehistoric site that was previously recorded and three newly found historic sites related to the turpentine industry (one the remnants of a circa 1900 homestead). None of the archaeological and historical sites identified for the Subject Property are significant in terms of National Register of Historic Places eligibility criteria, nor do any of the sites warrant additional archaeological work. It is the opinion of Heritage Services that no cultural resources eligible for the National Register will be impacted by the proposed development. The Survey was submitted to the County and on April 25, 2016 the County's Historic Resources Coordinator issued a letter concurring with the Survey's determinations and finding the archaeological work for this project complete.