

Exhibit A

Introduction and Background:

The property that is the subject of the proposed amendment consists of three parcels (Parcel Numbers 42-2N-27-0000-0027-0000, 42-2N-27-0000-0028-0000 and a portion of 42-2N-27-0000-0002-0010), which together total approximately 22.73 acres (the “Property”). The Property is located on the east side of US 17, just south of State Road 200. The applicant is seeking an amendment to change the Future Land Use Map designation for the Property from Medium Density Residential (“MDR”) and Commercial to High Density Residential (“HDR”). The remaining approximately 3.68 acres of Parcel Number 42-2N-27-0000-0002-0010 (the “Northern Parcel”) will remain within the Commercial FLUM designation and will retain its Commercial Intensive (“CI”) zoning designation.

The applicant intends to submit a companion rezoning application along with the proposed amendment to rezone both the Property from Commercial Intensive, Residential General 1 and Open Rural to Planned Unit Development (“PUD”). The PUD will allow the applicant to develop the Property with a multifamily apartment complex that will include a mix of market-rate and workforce rate units.

The Property is ideally situated for the applicant’s proposed mixed-use project. The Property is located in an area that has been designated as an Opportunity Zone by the U.S. Government meaning that it has been identified as an economically distressed area where investment and economic development is encouraged. The fact that the Property is located along two major transportation corridors gives the future residents the opportunity to work and play within close proximity to where they will live and also gives them quick and convenient access to the rest of Nassau County.

The proposed project is located the Central Region of the County, identified as an area of the County that currently has a low stock of multifamily, affordable housing. See, Nassau County Housing Affordability Assessment, the Shimberg Center for Housing Studies dated December 19, 2018 (the “2018 Needs Study”). By taking advantage of the bonus density available pursuant to 2030 Comprehensive Plan (the “Comp Plan”) Policy FL.01.03, the applicant will be able to further the objectives of the Housing Element of the Comp Plan Objective, along with the 2018 Needs Study, by providing additional affordable multifamily housing units for Nassau County residents.

(11) Review Criteria for Future Land Use Map Amendments:

(A) Demonstrate the extent to which the proposed amendment discourages urban sprawl per F.S. 163.3177(6)(a)(9), of which indicators are:

i. Promotes, allows, or designates for development substantial areas of the jurisdiction to develop as low-intensity, low-density, or single-use development or uses.

The proposed amendment, changing the property's Future Land Use Map designation from Medium Density Residential (MDR) to High Density Residential (HDR), does not promote, allow, or designate for development, substantial areas of the jurisdiction to develop as low-intensity, low-density, or single-use development or uses. The amendment will convert approximately 22.73 acres of land from a designation that currently permits a relatively low-intensity, low-density, development into a designation that will permit the construction of a high density multifamily housing complex that will include work force housing units. The proposed multifamily housing is compatible in use and scale with the surrounding land use designations and zonings. Additionally, the property will further the County's 2030 Comprehensive Plan Housing Element Goal, Objectives and Policies by providing and maintain an adequate housing inventory of decent, safe and sanitary housing in suitable neighborhoods at an affordable cost.

ii. Promotes, allows, or designates significant amounts of urban development to occur in rural areas at substantial distances from existing urban areas while not using undeveloped lands that are available and suitable for development.

The proposed amendment does not promote, allow, or designate significant amounts of urban development to occur in a rural area at a substantial distance from existing urban areas. The property that is the subject of the proposed amendment is within an Opportunity Zone and is an infill project (see Location Map attached to the Application). The property is located on US 17 within an existing urban/suburban area with existing public facilities available to serve the site. The property is also within close proximity to SR 200 which provides easy access to commercial, office and industrial areas.

iii. Promotes, allows, or designates urban development in radial, strip, isolated, or ribbon patterns generally emanating from existing urban developments.

The proposed amendment does not promote, allow or designate urban development in radial, strip, isolated or ribbon patterns generally emanating from existing urban developments. As noted, the property that is the subject of the proposed amendment is an infill site located along U.S. 17 close to SR 200 and existing commercial, office and retail areas.

iv. Fails to adequately protect and conserve natural resources, such as wetlands, floodplains, native vegetation, environmentally sensitive areas, natural groundwater aquifer recharge areas, lakes, rivers, shorelines, beaches, bays, estuarine systems, and other significant natural systems.

The proposed amendment will permit development which protects and conserves natural resources, such as wetlands, floodplains, native vegetation, and environmentally sensitive areas. As demonstrated in both the September 4, 2019 letter to the U.S. Army Corps of Engineers attached hereto as Exhibit 1, and the December 2019 Biological Assessment attached hereto as Exhibit 2, Environmental Consulting & Technology, Inc. ("ECT") has performed a preliminary jurisdictional determination for the onsite wetlands and has identified

approximately 3.86 acres of wetlands and other surface waters on the Property. The applicant intends to avoid and/or minimize any impacts to the wetlands.

With regard to protected species, the December 2019 Biological Assessment also concluded that development of the site is not likely to have an adverse impact on any protected species or their habitats. A field survey of potential habitat will be conducted prior to the start of construction.

Finally, ECT performed a Phase 1 Environmental Site Assessment on the Property and determined that there are no recognized environmental conditions found to be associated with the site. See July 2019 Phase 1 ESA attached as Exhibit 3.

v. Fails to adequately protect adjacent agricultural areas and activities, including silviculture, active agricultural and silvicultural activities, passive agricultural activities, and dormant, unique, and prime farmlands and soils.

The Property is not adjacent to or near any agricultural areas or activities. Therefore, the proposed amendment has no impact on any agricultural areas or activities.

vi. Fails to maximize use of existing public facilities and services.

Utilities are available to the Property and will be provided by JEA. See, JEA Availability Letter dated April 6, 2020, attached hereto as Exhibit 4. Additionally, the Property is located adjacent to two major transportation corridors.

vii. Fails to maximize use of future public facilities and services.

Utilities are available to the Property and will be provided by JEA. See Exhibit 4 (JEA Availability Letter). Additionally, the Property is located adjacent to two major transportation corridors. The applicant is unaware of any planned future improvements to the public facilities and services, other than the completion of the improvements to SR 200; however, any future improvements in the area which would benefit the Property would be utilized.

viii. Allows for land use patterns or timing which disproportionately increase the cost in time, money, and energy of providing and maintaining facilities and services, including roads, potable water, sanitary sewer, stormwater management, law enforcement, education, health care, fire and emergency response, and general government.

The proposed amendment does not allow for land use patterns or timing which disproportionately increase the cost in time, money, and energy of providing and maintaining facilities and services, including roads, potable water, sanitary sewer, stormwater management, law enforcement, education, health care, fire and emergency response, and general government. The applicant will pay all applicable impact fees in order to mitigate for any impacts to County facilities and services. Additionally, the applicant will enter into a Concurrency Proportionate Share Mitigation Agreement with the Nassau County School Board in order to ensure adequate school capacity is available to serve the proposed development.

ix. Fails to provide a clear separation between rural and urban uses.

The Property is located within an existing urban/suburban area. The site is an infill site located on US 17. There are no rural uses located near the site, so the proposed amendment does not fail to provide a clear separation between rural and urban uses.

x. Discourages or inhibits infill development or the redevelopment of existing neighborhoods and communities.

The proposed amendment does not discourage or inhibit infill development or the redevelopment of existing neighborhoods and communities. In fact, the property constitutes infill between existing uses on US 17. (See the Location Map attached to the application).

xi. Fails to encourage a functional mix of uses.

The proposed designation of HDR will encourage a functional mix of both market-rate and workforce-rate multifamily units. There will also be compatible commercial uses on the Northern Parcel.

xii. Results in poor accessibility among linked or related land uses.

The proposed amendment will not result in poor accessibility among linked or related land uses. The design of the Property will include an internal circulation pattern that will link the uses on the Property.

xiii. Results in the loss of significant amounts of functional open space.

The proposed amendment will not result in the loss of significant amounts of functional open space. As is shown on the companion PUD rezoning, the Property will include a significant amount of open space.

(B) Demonstrate the extent to which the proposed amendment is contiguous to an existing urban or urban transitioning area served by public infrastructure.

As demonstrated by the Location Map attached to the application, the Property abuts US 17 in an existing urban or urban transition area that is served by public infrastructure. Water and sewer is immediately adjacent to the subject parcel and there is adequate capacity available to serve the site. See Exhibit 4 (JEA Availability Letter). Additionally, pursuant to the results of a traffic study conducted by Chindular Traffic Solutions, Inc. dated May 13, 2020, attached hereto as Exhibit 5, when the year 2025 background traffic volumes and the project traffic assignment were analyzed, the US 17 intersection approaches are anticipated to operate at Level of Service E or better under build-out conditions as are all but one of the SR 200 intersections.

(C) Demonstrate the extent to which population growth and development trends warrant an amendment, including an analysis of vested and approved but unbuilt development.

The 2018 Needs Study identified key areas that the County must address in order to provide affordable housing options to its residents, including expanding multifamily alternatives to provide for a more diverse housing stock. See 2018 Needs Study p.5. The Study noted that the largest industries in the County are Accommodation and Food Service and Retail Trade which include more than 35 percent of the total workers in Nassau County and that the areas where most of these jobs are located are the Central Region and the Island Region. See 2018 Needs Study pp.4,9-11. Many of these jobs are filled by workers commuting from Duval County and South Georgia which the Study attributed to a lack of affordable housing adjacent to job locations. See 2018 Needs Study p.10-14. The Study found that most of the County's multifamily stock in 2018 was found in the Island Region in buildings with 10 or fewer units and specifically identified a need for multifamily housing within the Central Region of the County which includes the subject Property. See 2018 Needs Study pp.5&31.

The Background Data and Analysis for the Housing Element of the 2030 Comprehensive Plan, which was based in part on the 2018 Needs Study, projected a need for at least 13,611 new housing units by the year 2030 based upon projected population growth for Nassau County. Background p.21. The Background Data and Analysis highlighted a need for these new units to be located in areas with existing public services in order to reduce infrastructure costs, lessen traffic congestion, create transportation alternatives, and to reduce the percentage of the workforce commuting in from outside of the County. Background p.21. The Property meets these criteria in that it is located along two major transportation corridors that have available capacity and utilities are available immediately adjacent to the site.

The proposed project will address the need identified by both the 2018 Needs Study and the Housing Element by providing affordable multifamily units within the Central Region. Further, the location abutting US 17 and adjacent to SR 200 is ideal for employees working in both the Central and Island Regions of the County. Water and sewer are available to serve the site and US 17 and SR 200 are significant transportation corridors affording future residents easy access to the County's primary areas of employment.

(D) Demonstrate 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's Capital Improvement Plan, the Florida Department of Transportation Five-Year Work Program, the North Florida Transportation Planning Organization (TPO) Transportation Improvement Program, or privately financed through a binding executed agreement, or will otherwise be provided at the time of development impacts as required by law.

There is adequate infrastructure to accommodate the proposed amendment. JEA has indicated there is adequate water and sewer capacity to serve the Property located immediately adjacent to the site. Exhibit 4 (JEA Availability Letter). The only planned/programmed roadway improvement project within the study area is the widening of SR 200/A1A into a 6-lane divided highway which is scheduled to be completed by 2020. See Exhibit 5 (Traffic Study). The Traffic Study indicates that the roadways within a 1-mile radius of the Property have sufficient capacity available to serve the site and will not be negatively impacted by the proposed project. See Exhibit 5 (Traffic Study).

(E) Demonstrate the extent to which the amendment will result in a fiscally and environmentally sustainable development pattern through a balance of land uses that is internally interrelated; demonstrates a context sensitive use of land; ensure compatible development adjacent to agriculture and environmentally sensitive lands; protects environmental and cultural assets and resources; provides interconnectivity of roadways; supports the use of non-automobile modes of transportation; and appropriately addresses the infrastructure needs of the community.

The proposed amendment to HDR will serve a demonstrated need in the County for additional multifamily housing. See 2018 Needs Study & Background Data and Analysis, Housing Element. The applicant will ensure that the development is compatible with adjacent parcels and that development minimizes impacts to environmentally sensitive lands. The location of the Property affords future residents the opportunity to utilize public transportation, if available, on both US 17 and SR 200.

(F) Demonstrate the extent to which the amendment results in a compact development form that fosters emergence of vibrant, walkable communities; makes active, healthier lifestyles easier to enjoy; conserves land; supports transportation alternatives; reduces automobile traffic congestion; lowers infrastructure costs; reduce vehicular miles traveled and costs related to household transportation and energy; and puts destinations in closer proximity. Successful compact development is illustrated through the use of:

- 1. Clustered population and/or employment centers;**
- 2. Medium to high densities appropriate to context;**
- 3. A mix of land uses;**
- 4. Interconnected street networks;**
- 5. Innovative and flexible approaches to parking;**
- 6. Multi-modal transportation design including pedestrian, bicycle, and transit-friendly options;**
- 7. And proximity to transit.**

The proposed amendment will permit the development of a multifamily project with a mix of market-rate and workforce-rate units within close proximity to commercial, retail and office uses. The site is located near two major transportation corridors, US 17 and SR 200, making public transportation a viable option for future residents. The Property is also near major

employment centers located along SR 200 and affords easy access to jobs on the Island as well. As discussed in detail above, this project will address a demonstrated need for multifamily housing in the County and specifically in this particular part of the County.

(G) Demonstrate the extent to which the amendment does not propose environmental impacts that would significantly alter the natural landscape and topography such that it would exacerbate or lead to increased drainage, flooding, and stormwater issues.

The proposed amendment will not significantly alter the natural landscape and topography such that it would exacerbate or lead to increased drainage, flooding and stormwater issues. The proposed project avoids and/or minimize impacts to existing onsite wetlands and will otherwise comply with all applicable federal and state regulations regarding flood zone restrictions and stormwater management.