



**PLANNING DEPARTMENT**  
NASSAU COUNTY, FLORIDA

**EXHIBIT A: COMPREHENSIVE PLAN CONSISTENCY ANALYSIS**  
**Planning and Zoning Board**  
**CPA21-009 (East Nassau Community Planning Area/Wildlight)**  
**April 19, 2022**

<b>Applicable Policy Reference</b>	<b>Determination of Consistency</b>
CONSERVATION ELEMENT POLICY CS.02.09	✓
POLICY CS.02.13	✓
POLICY CS.02.15	✓
POLICY CS.02.16	✓
POLICY CS.03.03	✓
POLICY CS.06.01	✓
POLICY CS.06.07	✓
POLICY CS.08.01	✓
POLICY CS.08.02	✓
POLICY CS.08.06	✓
POLICY CS.08.07	✓
FUTURE LAND USE ELEMENT OBJ. FL.01	✓
POLICY FL.01.02	✓
POLICY FL.01.04	✓
POLICY FL.02.03	✓
POLICY FL.05.03	✓
POLICY FL.05.05	✓
POLICY FL.08.04	✓
POLICY FL.08.05	✓
POLICY FL.08.06	✓
POLICY FL.09.02	✓
POLICY FL.09.03	✓
POLICY FL.09.05	✓
OBJECTIVE FL.13	✓
POLICY FL.13.01	✓
POLICY FL.13.02	✓
POLICY FL.13.03	✓
POLICY FL.13.04	✓
POLICY FL.13.06	✓
POLICY FL.13.07	✓
POLICY FL.13.08	✓
POLICY FL.13.09	✓
POLICY FL.13.10	✓
POLICY FL.13.11	✓
POLICY FL.13.12	✓
POLICY FL.13.13	✓
POLICY FL.13.14	✓
POLICY FL.13.15	✓
POLICY FL.13.16	✓
HOUSING ELEMENT POLICY H.01.04	✓
POLICY H.08.01	✓
POLICY H.08.02	✓
POLICY H.09.01	✓
PROPERTY RIGHTS ELEMENT POLICY PR.01.01	✓
PUBLIC SCHOOLS FACILITIES ELEMENT POLICY PSF.02.02	✓
POLICY PSF.02.03	✓
POLICY PSF.03.05	✓
POLICY PSF.03.08	✓
POLICY PSF.04.02	✓
POLICY PSF.04.03	✓
POLICY PSF.04.04	✓
POLICY PSF.04.05	✓



	POLICY PSF.04.06	✓
	POLICY PSF.04.07	✓
	POLICY PSF.04.08	✓
RECREATION & OPEN SPACE ELEMENT	POLICY ROS.01.04	✓
	POLICY ROS.01.05	✓
	POLICY ROS.01.06	✓
	POLICY ROS.01.07	✓
	POLICY ROS.01.09	✓
	POLICY ROS.01.16	✓
	POLICY ROS.02.01	✓
	POLICY ROS.02.02	✓
	POLICY ROS.02.03	✓
	POLICY ROS.02.05	✓
	POLICY ROS.02.06	✓
	POLICY ROS.02.08	✓
	POLICY ROS.03.03	✓
TRANSPORTATION ELEMENT	POLICY T.02.03	✓
	POLICY T.04.01	✓
	POLICY T.04.04	✓
	POLICY T.04.05	✓
	POLICY T.04.06	✓
	POLICY T.05.01	✓
	POLICY T.05.03	✓

The following Comprehensive Plan objectives and policies (in italics) pertain to and support the proposed amendment. While the applicant has mostly reiterated overall sector plan conformance with policies and criteria often without providing specifics on this specific application, staff has endeavored to address each applicable policy in the context of this amendment and not the overall adopted sector plan.

### **CONSERVATION ELEMENT**

#### **Policy CS.02.09**

*Where appropriate, freshwater wetlands shall be incorporated into stormwater management plans in order to ensure the continuity of natural flow ways.*

#### **Policy CS.02.13**

*Stormwater management systems, including rerouting and maintenance of drainage ditches and control of development in areas of sheetflow, shall be used where appropriate, to enhance the hydrologic conditions of stressed or impacted wetlands.*

#### **Policy CS.02.15**

*Silviculture activities shall be encouraged to follow the best management practices outlined in the most recent Silviculture Best Management Practices Handbook published by the Florida Department of Agriculture and Consumer Services, Division of Forestry.*

#### **Policy CS.02.16**

*Waterfront developments shall be designed to ensure that stormwater runoff and erosion do not affect ambient water quality of adjacent waters in accordance with Chapters 381 and 62-600, F.A.C.*

Staff comment: future development shall be subject to these standards.



**Policy CS.03.03**

*In order to avoid habitat fragmentation, roads crossings within areas designated Conservation (CSV I and II) on the Future Land Use Map (FLUM) will be minimized and incorporate fences and other features to direct wildlife to safe crossings.*

Staff comment: this policy is also repeated in the Long-Term Habitat Management Plan (Exhibit H), which sets guiding principles including a comprehensive wildlife management approach that plans for habitat diversity and wildlife foraging and movement.

**Policy CS.06.01**

*The County shall seek to acquire management agreements for flatwoods and forests of the St. Mary's River Basin that would favor the continued management of the timber resources on a sustainable, long term basis, applying Best Management Practices as described in the most recent Florida Division of Forestry publication: Silviculture Best Management Practices Handbook.*

Staff comment: sustainable timbering is also a guiding principle of the Long-Term Habitat Management Plan (Exhibit H). This includes the use of tree thinning instead of clear-cutting, mechanical rolling to restore natural grade, restoring native pine flatwood vegetative communities, removing exotics, among other techniques.

**Policy CS.06.07**

*The County shall cooperate and seek partnerships with its adjacent jurisdictions, Federal and State agencies, non-profit organizations and private landowners to retain the significant habitats for native wildlife and vegetation. If on-site habitat of threatened or endangered species should be disturbed by new development, similar habitat should be protected, through land bank mitigation, with an emphasis on viability by virtue of its size, configuration, and connecting habitat.*

Staff comment: the County will proactively coordinate with the applicant and successors to ensure that Conservation Habitat Network (CHN) lands are protected and restored as needed.

**Policy CS.08.01**

*The County shall encourage energy-efficient land use patterns within the Urban Development Area and Rural Transitioning Areas as shown on the Development and Preservation Framework found in the background data and analysis for this Plan, promoting a compact mixture of residential and non-residential uses in order to conserve energy and reduce greenhouse gas emissions.*

Staff comment: the approved and proposed amendment provides energy-efficient land use patterns such as a balance of land uses that is calibrated to maximize infrastructure efficiency and encouraging alternative modes of transportation through required bike/ped facilities.

**Policy CS.08.02**

*The County shall encourage energy efficiency in the design and construction of new housing, and shall consider integration of the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Green Building Rating System or another nationally recognized green building rating system into the Land Development Code to promote sustainable site development, water savings, and energy efficiency.*



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Staff comment: this policy echoes Policy FL.13.03 which requires various green development principles including the use of local building materials and architectural features as well as allowing solar panels as permitted accessory uses.

#### **Policy CS.08.06**

*The County shall promote the use of Low Impact Development (LID) techniques approved by the St. Johns River Water Management District within new subdivisions in order to protect the water resources of the County, preserve open space, minimize land disturbance and link green infrastructure components.*

#### **Policy CS.08.07**

*The County shall promote the use of Energy Star or equivalent high-efficiency appliances and fixtures to reduce energy use in public and private buildings.*

Staff comment: future development shall comply with LID standards and energy-saving standards.



## **FUTURE LAND USE ELEMENT**

### **OBJECTIVE FL.01**

*The County shall use the Future Land Use Map (FLUM) to correlate future land uses with the appropriate environmental conditions, the availability of supporting infrastructure, and where they are most compatible with surrounding land uses.*

Staff comment: the application meets the objective above in the following ways.

#### Correlation between FLUM and environmental conditions

- The Conservation and Habitat Network (CHN) preserves in a connected manner wetlands, floodplains, and uplands internal and adjacent to wetlands, to both preserve habitat and provide for wildlife travel.
- Use of lower density Tier 3 Residential (maximum ½ acre lots) land use adjacent to CHN to minimize impacts to the environment.

#### Supporting infrastructure

- The property is adjacent to areas of the County that are served with central water and sewer, improved roads (SR 200, US 17, Pages Dairy Rd., Chester Rd.), recreation facilities (Yulee ballfields, John Muir Park, Lofton Creek boat ramp, and the future Blackrock Community Park), fire stations (Yulee and Nassau Place), schools (Yulee Primary and Yulee Middle) and law enforcement (Sheriff's Department on William Burgess Blvd.).

### **Policy FL.01.02**

*All regulations adopted to implement this Plan and development permits issued shall be consistent with the land use categories described below and spatially displayed on the Future Land Use Map. The Future Land Use Map shows the proposed general distribution and location of land for various purposes. The categories establish long-range, maximum (and in some cases minimum) densities and intensities of land uses.*

#### **H) Multi-Use (MU)**

*The primary purpose and intent of the Multi-Use designation is to accommodate, in a more innovative fashion, development or redevelopment of areas in a larger size and scale.*

*The guiding principles of this designation are to:*

- *Plan for communities, not a single use suburban development;*
- *Create community identity, a sense of place and definition through urban form;*
- *Promote innovative design standards through development orders and implementation of county development regulations;*
- *Facilitate mixed-use development with horizontal and vertical land use integration;*
- *Reduce the need for automobile travel by promoting multimodal transportation options;*
- *Promote energy efficiency and reductions in vehicle miles traveled (VMT);*
- *Create walkable neighborhoods connected by multi-use paths, recreational trails and streets;*
- *Provide opportunities for workforce housing;*
- *Provide economic development opportunities; and*
- *Protect and strengthen existing environmental systems and habitats.*

*1. An area designated Multi-Use on the adopted Future Land Use Map (FLUM) shall meet the following criteria:*



- a) An area designated Multi-Use on the FLUM shall include a contiguous geographically defined area consisting of a minimum of 250 gross acres. For purposes of these criteria, areas divided only by a public right-of-way shall be considered contiguous. Smaller isolated tracts of land that are under common ownership with the primary Multi-Use area and which are located within a ½ mile of the primary Multi-Use area may also be included.
- b) An area designated Multi-Use on the FLUM shall consist of a mixture of at least three (3) different land uses, with no single land use exceeding seventy (70) percent. One (1) of the three (3) required land uses shall be residential and provide for a minimum of seven-hundred fifty (750) dwelling units.
- c) Future Land Use Element (FLUE) policies identifying a development program, underlying land use sub-categories, the desired urban form and general development guidelines for a Multi-Use area shall be adopted in conjunction with an amendment for the Multi-Use FLUM designation. As part of the specific Multi-Use policies, the development program distribution and the location of underlying land use sub-categories shall be generally depicted on a Master Land Use Plan.
- d) The underlying land use sub-categories of a Multi-Use area, as generally depicted on the Master Land Use Plan, may consist of existing FLUM designations or new designations established to address the unique character of the Multi-Use area.
- e) Any land area that is amended to Multi-Use after July 1, 2010, shall be subsequently shown as such on the adopted FLUM and recognized by the County as a "Community Planning Area". The FLUM shall delineate the defined geographical boundary and name for each adopted Community Planning Area.
- f) Development within an area designated Multi-Use on the FLUM is to be designed so as to minimize the impact on natural resources and systems. Prior to the adoption of any FLUM amendment to Multi-Use, appropriate environmental studies must be completed as part of the application process in order to guide development away from the environmentally sensitive areas identified on the site. Such studies should utilize professionally recognized methodologies and should be based upon best available information, including the Florida Natural Areas Inventory (FNAI), the National Wetlands Inventory (NWI), SJRWMD Land Use Cover maps (FLUCCS) and the Uniform Mitigation Assessment Methodology (UMAM) adopted by DEP.
- g) In conjunction with, or subsequent to, the adoption of a Comprehensive Plan amendment for the Multi-Use FLUM designation, all properties involving development applications shall be rezoned as one or more districts, consistent with the uses, densities and intensities of the underlying land use sub-category.

**2. The following are approved Multi-Use designations:**

- c) The East Nassau Community Planning Area (ENCPA), which carries the Multi-Use Community Planning Area designation on the Future Land Use Map (Ordinance 2010-11), shall allow the following land uses: Residential (to include Low, Medium and High Density) up to 24,000 dwelling units, Non-Residential uses up to 11,000,000 square feet of aggregate gross floor area, consistent with the Multi-Use Community Planning Area designation. The development rights may be utilized only within the boundaries of the East Nassau Community Planning Area (ENCPA) and all development must abide by the development standards specified under Objective FL.13 and its associated policies in the Future Land Use Element of this Plan.

Staff comment: the property is entirely within the Multi-Use FLUM designation, which is also applied to the Tributary (formerly Three Rivers) DRI, Summer Beach DRI, Amelia Island Plantation DRI, and the William Burgess Overlay District. This FLUM designation will not change, but the internal arrangement of land use sub-categories would be modified with this amendment. The BoCC determined that the original ENCPA Sector Plan met the bulleted criteria above. Staff has determined that the criteria are still met, as further described below.



- The Wildlight Plan is for a community with a wide range of residential and nonresidential land uses, not a single use suburban development.
- Community identity and a sense of place are built by distinctive bonding elements such as the CHN greenway network; Green Ribbon along the St. Marys River; walkable Village Centers; higher density residential uses in proximity to Village Centers and Resort land use sub-categories that provide sufficient population to support local businesses including dining and entertainment; schools and parks arranged around Village Centers to add further vibrancy and activity; and a trail system that links all areas without depending on the automobile and connects parks and schools and all land uses.
- Future development must provide innovative design standards to effectively implement the amended Future Land Use Map.
- Future development must employ mixed-use elements with horizontal and vertical land use integration.
- Implementation of the proposed multi-modal transportation system will reduce the need for automobile travel by promoting multimodal transportation options.
- Interspersed Village Centers will provide nearby goods and services that will promote energy efficiency and reductions in vehicle miles traveled (VMT), particularly with the safe and comfortable connection of sidewalks and bicycle trails.
- All neighborhoods will be walkable with required sidewalks, multi-use paths, recreational trails and streets that connect homes, required neighborhood parks, and village centers.
- Future development shall provide opportunities for workforce housing.
- Village Centers and Residential Neighborhood commercial allow economic development opportunities, particularly for small businesses.
- The CHN protects and strengthens existing environmental systems and habitats.

The following additional criteria of Policy 1.02, Multi-Use FLUM are discussed below.

- a) The amendment area exceeds the minimum 250 gross acres.
- b) The amendment area includes a mixture of at least three different land uses, with no single land use exceeding seventy (70) percent. One of the three required land uses in the amendment area residential and provides for a minimum of seven-hundred fifty (750) dwelling units.
- c) As required, underlying land use sub-categories are depicted on the Master Land Use Plan.
- d) The amendment area does not change proposed FLUM sub-categories including CHN, Residential 1, 2, & 3, Village Center, and Resort.
- e) The amendment area remains as a Community Planning Area.
- f) The land use subcategories are designed so as to minimize the impact on natural resources and systems. The CHN preserves as wildlife habitat a wide variety of wetlands, creeks, uplands, and floodplains. Relatively more intensive sub-categories like the Village Center and Resort are generally located away from the CHN, while less intensive sub-categories like Tier 3 Residential often flank the CHN. The environmental assessment provided with the amendment justifies the CHN and other land use placements. Future development shall provide for protection to unique natural systems such as the river bluffs and mixed age and species plant and tree diversity that often accompany “hilly” areas landward of the bluffs.

***Policy FL.01.04***



*All amendments to the Future Land Use Map (FLUM) shall provide justification for the need for the proposed amendment. In evaluating proposed amendments, the County shall consider each of the following:*

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

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

Staff comment: the amendment does not represent low-intensity, low-density, or single-use development. The adopted overall ENCPA sector plan allows for between 2.2 and 11.6 million square feet of non-residential space under the Regional and Employment Centers, Resort, Village Center, and Residential Neighborhood FLUM sub-categories. This equates to between around 90 and 480 square feet of nonresidential space for each of the 24,000 dwelling units. The subject properties are planned as more of a residential community, with 1.4 million square feet of nonresidential space at a ratio of around 95 square feet of nonresidential space for each of the maximum 14,944 units. West of US 17, DSAP 1 (the part of Wildlight currently under development) and future DSAPs have large employment center components with the closer proximity to I-95, while the amendment area will focus more on neighborhood retail and services in the Village Centers and Resort commercial uses. The land use subcategories provide for a range of densities from the one unit-per ten acres for non-clustered Tier 3 Residential sub-category, to 20 units per acre in the Resort and Village Center sub-categories.

- 2) *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.*

Staff comment: the amendment area is in the face of growth that continues up the US 17 and Chester Rd. corridors, and that will logically continue out the CR 108 Collector, a much-needed parallel road to SR 200/A1A. The choice is to allow or futilely try to stop scattered and unplanned subdivisions and strip malls, or direct growth into a smart growth model that minimizes traffic impacts, reduces vehicle miles travelled, provides jobs for local residents, and provides for a variety of housing types. The amendment area already captures this growth and instead of reacting to growth, the County can improve efficiency, conserve lands, improve health through parks, trails, and outdoor activities, provide jobs, and attract visitors.

- 3) *Promotes, allows, or designates urban development in radial, strip, isolated, or ribbon patterns generally emanating from existing urban developments.*

Staff comment: the sector plan is approved with the prohibition of these development patterns, and this amendment does not change that. The development pattern is an efficient hub and spoke, with the village centers serving as hubs of satellite neighborhoods, all connected by surface streets, walkways, bike trails, hiking trails, and wildlife corridors.



- 4) *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.*

Staff comment: as stated in the narrative, the interconnected preservation of uplands and wetlands creates a cohesive environmental preservation system rather than a fragmented system. The CHN contains the connected wetland strands encompassing over 80% of the ENCPA wetlands; and over 80% of the mapped 100-year floodplain. The CHN accomplishes a number of laudable goals including restoration of natural hydrology and providing for safer wildlife movement including wildlife underpasses and crossings.

- 5) *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.*

Staff comment: the amendment area has historically been utilized for timbering, most of which has been pine plantation with one notable exception. This is the north central part of the amendment area southeast of Crandall Landing, landward from the river bluffs. Staff learned that this area was timbered in a manner that thinned the forest but left intact a mixed-age and mixed-species tree canopy. Polycultures like this score high in habitat value and present a striking appearance, particularly in the hilly areas. This and other similar areas of value shall be protected through open space designation, tree protection, low impact development stormwater standards, and grade change prohibitions.

- 6) *Fails to maximize use of existing and future public facilities and services.*

Staff comment: the eastern and southern halves of the amendment area are close to public facilities and services. There are recreation areas (Yulee Ballfields, Lofton Creek boat ramp), a public school (Yulee Middle at SR 200 & Miner Rd.), and public safety facilities (Pages Dairy Rd. and Nassau Place fire stations and Sherri's office on William Burgess Blvd.) are nearby. However, it is the intent of the sector plan to provide facilities generated by internal development. It is likely that at least two fire station sites will be needed in the amendment area. The School District facilities staff have agreed with the applicant that the development will generate a need for three elementary schools and one middle and high school, and preliminary school sites have been identified. County staff, with the assistance of parks consultants, have worked with the applicants to identify future community and regional parks.

- 7) *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.*

Staff comment: the classic sprawl pattern of one-acre lots requires an inordinate cost to serve far-flung uses with roads, public safety, utilities and schools. The approved sector plan presents a more efficient and compact development form by concentrating density and intensity in and around the



Village Centers. Identifying future phases of development will allow for master planning of utilities in particular. As noted in the technical memo from the Engineering Services Director (Exhibit B), the proposed road system as constructed by the developer will adequately serve Wildlight residents and workers and also provide through-movement.

- 8) *Fails to provide a clear separation between rural and urban uses.*

Staff comment: the amendment area preserves rural character through the CHN, and the buffer between the CHN and development areas provides for a natural and clear separation.

- 9) *Discourages or inhibits infill development or the redevelopment of existing neighborhoods and communities.*

Staff comment: the amendment does not discourage infill development. It is located in a developing area of varying densities.

- 10) *Fails to encourage a functional mix of uses.*

Staff comment: the proposed amendment will result in a functional mix of uses, ranging from multi-family to rural estate lots, all located close to multiple village centers providing a variety of retail, service, dining, and entertainment uses.

- 11) *Results in poor accessibility among linked or related land uses.*

Staff comment: connectivity will be required between neighborhoods, Village Centers, parks, and schools, often through surface streets and more often with sidewalks and bike trails.

- 12) *Results in the loss of significant amounts of functional open space.*

Staff comment: the CHN preserves over 47% of the amendment area as open space, including wetlands, floodplains, and uplands. Over 2,100 of the 7,004 CHN acres are uplands either adjacent to or internal to wetland systems.

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

Staff comment: the amendment area is adjacent to the SR 200 corridor, which is served by central water and sewer and a growing network of arterial and collector roadways. The amendment area is also adjacent to the Yulee area, which is a historic hamlet poised to develop and redevelop as a mixed-use center that will serve the surrounding neighborhoods. Finally, the amendment area is adjacent to the Chester Rd. corridor, which is served by central water and sewer, the planned Blackrock Community Park, and the extension of Pages Dairy Rd. to strengthen the road system parallel to SR 200.

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

Staff comment: in the last year, Nassau County experienced a growth in population of nearly 5% and in the next ten years will be the fastest growing county in the state. The number of building permits issued



in the last two years is the highest in the County's history. The amendment area is an appropriate place to direct the ongoing growth since it has already been master planned.

- (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;*

Staff comment: as shown on the approved and proposed Mobility maps on the next page, the proposed amendment adds two new mobility plan roads to the already-planned east-west road (CR 108 Connector) and the north-south road. These new roads are a parallel road connecting CR 108 Connector with US 17, and a road linking the Connector with Pages Dairy Rd. The developer will construct these roads and in exchange receive credits toward the required mobility fee.

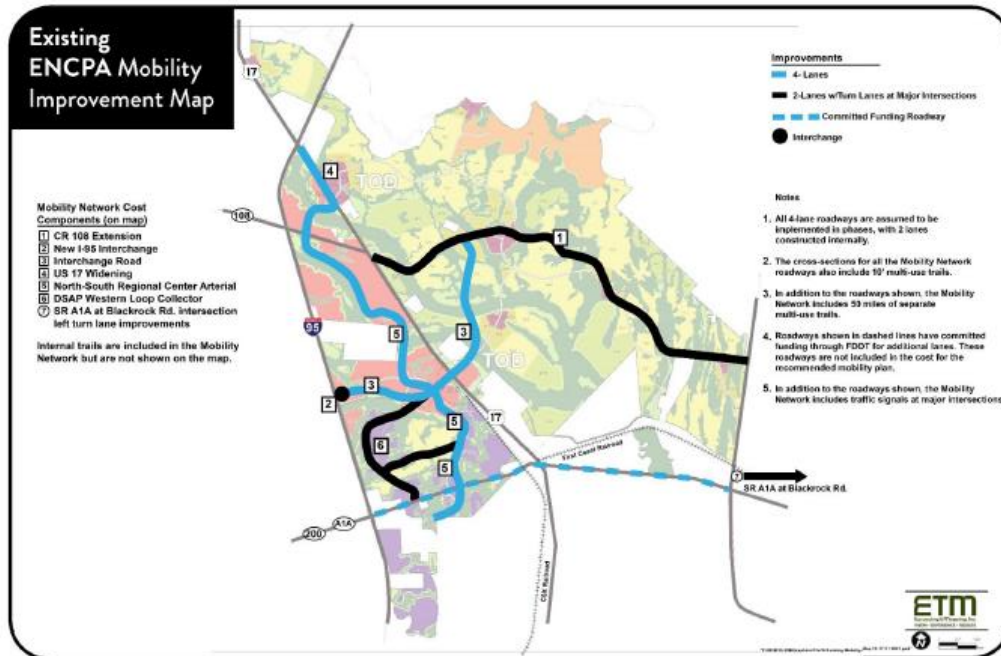


Figure 5: Adopted/current mobility network map

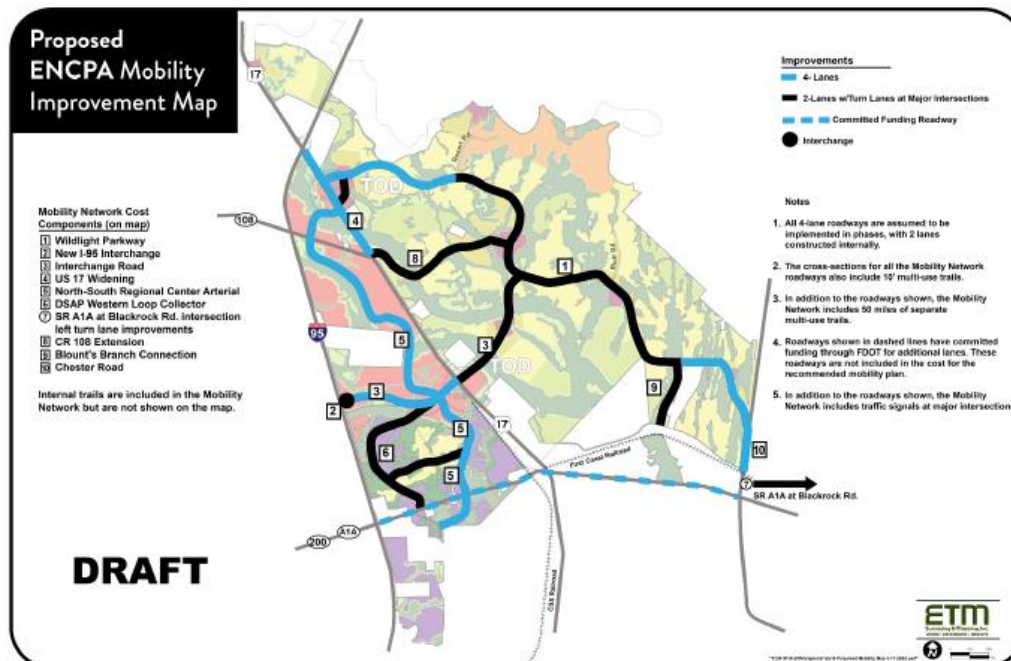


Figure 6: Proposed mobility network map



*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; ensures 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.*

Staff comment: the approved and proposed amendment substantively accomplishes these outcomes. There is a balance of land uses that is calibrated to maximize infrastructure efficiency, environmental preservation, encourage walking and bicycling, and locate lower-intensity land use sub-categories near existing communities so as to minimize impacts. However, it should be noted that the initial fiscal analysis was not updated to reflect revisions to the land use mix for the amendment area. While it is unlikely, a change in the land use mix could substantively change the fiscal circumstances under which this sector plan was approved. There is enough of a significant change – one third more Tier 2 acres – that warrants another look. Staff has requested the updated fiscal analysis in both rounds of completeness comments and did not receive it.

(E) *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.*

Staff comment: the amendment employs these strategies.

(F) *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.*

Staff comments: development of the CHN and repair of its hydrology represents an organized and effective approach to environmental land conservation and flooding minimization. The applicant's commitment to low impact development stormwater methods and other similar environmentally sensitive approaches will help to reduce drainage and flooding issues.



**Policy FL.02.03**

**St. Marys River Overlay District**

*The intent of the St. Marys River Overlay District is to protect and preserve the beautiful and unique St. Marys River, which possess excellent water quality, outstanding natural habitats, diverse wildlife, and have considerable recreational value.*

*The St. Marys River Overlay District applies to those properties along the St. Marys River within the upper and lower St. Marys River Basin that lie within Nassau County, Florida. The Overlay District shall be applicable to all Zoning Districts and may be supplemental to the requirements of each Zoning District. Minimum lot requirements for all parcels in all zoning districts within the district are as follows:*

*A. Minimum lot width:*

- 1. One hundred (100) feet for lots directly adjacent to the riverbank.*
- 2. Lots not directly adjacent to the riverbank shall be the same as the underlying zoning district as set forth in the land development regulations.*

*B. Minimum lot area:*

- 1. Lots directly adjacent to the riverbank – one (1) acre.*
- 2. Lots not located directly on the riverbank shall be the same as the underlying zoning district as set forth in the land development regulations.*

*The minimum yard requirements of the underlying zoning district shall apply, as set forth in the land development regulations.*

*Existing lots of one acre or less and existing structures, as of June 23, 2003 (the date of the adoption of this overlay by Ordinance 2003-34) are grandfathered in as conforming uses.*

*On-site sewage and disposal systems are prohibited within one hundred (100) feet of the riverbank, measured from the mean high-water line of the tidally influenced portions or from the normal annual flood line of the St. Marys River (whichever is more restrictive). "Tidally influenced" shall mean subject to the ebb and flow of the tides and has as its boundary a mean high-water line as defined in Section 177.27(15), Florida Statutes. All other State, Federal, and local regulations shall be applicable.*

Staff comment: riverfront development shall be subject to these standards.

**Policy FL.05.03**

*Historic resources shall be protected through designation as historic sites by the State or County. Such designated sites shall require site plan review procedures for proposed alterations or remodeling that will ensure, through the permitting process, that the proposed activity will not degrade or destroy the historical/archaeological significance of the site.*

**Policy FL.05.05**

*Proposed development projects shall be reviewed at the time of issuing a building permit or development order to determine potential impacts on known historic sites. When such construction or other development activity may adversely impact a historic/ archaeological site, the proposed development must provide sufficient*



*buffering (spatial separation, physical wall, or other method approved by the County Planning and Zoning Board) before a permit is issued.*

Staff comment: the Cultural Resources Survey (Exhibit I) identified several significant historic and archeological sites, which will be protected in the development process.

**Policy FL.08.04**

*The County shall discourage Urban Sprawl by requiring higher density compact development to occur in areas that are planned to be served by public facilities, providing for sound and cost-efficient public facility planning. It will also require lower density development to occur in areas that are environmentally sensitive or in areas that are not planned to receive a high level of public facilities or services.*

Staff comment: the amendment is in keeping with this policy in that higher density development will occur in or around Village Centers or in the Resort land use sub-category, areas that will fully be served by infrastructure.

**Policy FL.08.05**

*The County shall direct commercial and multi-family residential uses into clustered or nodal development patterns, that eliminate or reduce strip or ribbon development following major County or state roads.*

Staff comment: such uses within Village Centers and Residential Areas shall meet this standard of compact development for higher density and commercial uses.

**Policy FL.08.06**

*The County shall direct new residential and commercial development in rural and transitioning areas to accomplish the following:*

*(A) Develop in a pattern providing for compact, mixed use, contiguous development patterns and avoids development indicative of urban sprawl as defined in Policy FL.01.04.*

*(B) Develop in clustered or nodal patterns, eliminating or reducing strip-style development along arterial and collector roads.*

*(C) Develop in a pattern that supports the creation, extension and maximization of central (municipal or regional) water and sewer systems.*

*(D) Contribute to a sustainable development pattern of mixed-use communities that provide for integrated residential and employment opportunities; and provide for civic and public facilities including emergency medical, fire protection and police facilities, parks and other recreational facilities, schools, hospitals and other public or institutional uses.*

*(E) Ensure compatible development adjacent to agriculture lands and minimize the potential impact of urban development on the agricultural productivity of the area.*

*(F) Provide for safe and accessible streets, support the interconnectivity of roadways and the use of bicycle, pedestrian and multi-modal transportation facilities.*

*(G) Through the use of Planned Unit Developments (PUDs) or similar development orders, use enhanced development standards and design elements for new development to promote community identity and a sense of place. This includes but is not limited to standards for diverse housing types, public spaces, street design, architectural design standards, multi-use trails, stormwater management facilities, landscaping, and signage.*

Staff comment: the amendment "checks all these boxes."



**Policy FL.09.02**

*Land suitable for utility facilities to support future development needs shall be identified by the Engineering Services Department and, by amendment, designated on the Future Land Use Map for private or public acquisition.*

Staff comment: the Engineering Services Department will ensure that utility sites to support future development are identified.

**Policy FL.09.03**

*The County will ensure sufficient land is available for public school facilities approximate to residential development in order to meet the projected needs for such facilities.*

Staff comment: five school sites have been identified to serve the amendment area, including three elementary schools, a middle school, and a high school.

**Policy FL.09.05**

*The County shall evaluate development plans to ensure that open space is provided for recreation in all proposed residential or mixed use development projects in accordance with the established level of service.*

Staff comment: the amendment area will be subject to Code of Ordinances Sec. 29-46 (Public Uses), which implements this policy requiring neighborhood park development.

**OBJECTIVE FL.13**

*East Nassau Community Planning Area*

*Consistent with the Multi-Use Community Planning Area land use provisions of Future Land Use Element Policy FL.01.02, the East Nassau Community Planning Area (ENCPA) is hereby created and adopted. The principles and standards of the following policies will be implemented during future development orders within the ENCPA and are enforceable as provided for in Chapter 163, F.S. The ENCPA shall recognize the inherent, integral relationship between transportation, land use and urban design and the degree that these elements affect one another and shall provide high value regional employment and economic development opportunities through the promotion of compatible and financially sustainable land use patterns. To facilitate the use of multiple modes of transportation, leading to a reduction in automobile use and vehicle miles traveled, development shall be in the form of complete communities that discourage urban sprawl; strengthen long range transportation planning efforts through creation of parallel transportation corridors, walkable and transit-supporting environments; preserve environmental resources; and create a greater diversity of housing types and prices.*

Staff comment: the 16 applicable policies associated with this objective set forth an assortment of guiding development principles which apply to this amendment. These policies are paraphrased below.

- FL.13.01 requires that development protects unique physical and visual characteristics such as bluff topography, the St Marys River, Lofton Creek, and significant historic or archeological resources; provides connected recreation, trails, and schools; provides a variety of housing types with higher density in Village Centers; designs for alternative transportation especially pedestrian and bicycle facilities; designs for future transit; conserves energy, water resources and build energy-efficient; and establishes the CHN.
- FL.13.02 provides definitions.



- FL.13.03 commits to green development practices, which protect natural systems; considers surface waters, conservation lands, and open space as a visual amenity; encourages alternative transportation modes to reduce vehicle miles travelled; incentivizes water conservation; reduces landscape irrigation water through use of native and drought-resistant plants; and encourages green building practices to promote energy conservation.
- Policy FL.13.04 recognizes the importance of and requires recreational trails and multi-use pathways.
- Policy FL.13.06 requires Transit Oriented Development (TOD) areas on the land use plan in the US 17 corridor. There are two TODs along US 17, and the northern TOD includes part of this amendment area, namely the Village Center located where the CR 108 Connector crosses US 17. This Village Center TOD requires compact building and site design; a walking and biking environment; a mix of transit supportive uses; attention to pedestrian access; high concentration of population and employment close to future transit stations; transit-supportive parking; specified development percentages assigned to mixed use blocks, retail blocks, office blocks, residential blocks, and civic blocks; and parking located behind or beside commercial buildings.
- Policy FL.13.07 sets forth land use subcategories and provides development standards for these categories. This amendment area includes the CHN, Village Center, Residential Neighborhood, and Resort subcategories. Examples of the standards include wildlife crossing standards and environmental education in the CHN category, shared parking and civic space in the Village Centers, and use of stormwater ponds as visual amenities in all land use subcategories.
- Policy FL.13.08 requires that a variety of development and design standards be developed for PDPs including block size and connectivity standards, minimum and maximum lot area, maximum lot depth and width, building setbacks, building heights, accessory dwelling unit standards, streetfront building transparency standard (windows), parking location, street cross sections, open space standards, landscaping standards, and pedestrian amenities, sign codes, and lighting standards, among others.
- Policy FL.13.09 sets forth the St Marys River Greenway, known in this amendment as the “Green Ribbon.” This greenway will run along more than 7 miles of riverfront, between 50 and 100 foot wide, and include a multi-use trail, observation decks, golf courses, and other passive recreation uses. While the applicant expressed the intent to show the Green Ribbon on FLUMS-6, the most recent submitted map did not include it.
- Policy FL.13.10 sets forth the overall minimums and maximums for residential and nonresidential development, as noted in the table below.

2010 - 2015 MAXIMUM ENCPA DEVELOPMENT PROGRAM	
Residential	1,200 Dwelling Units
Non-Residential	1,210,000 Sq. Ft.
2030 MAXIMUM ENCPA DEVELOPMENT PROGRAM (Cumulative)	
Residential	24,000 Dwelling Units
Non-Residential	11,000,000 Sq. Ft.

- Policy FL.13.11 establishes an overall minimum jobs-to-housing ratio of 0.84 (jobs divided by employed residents).



- Policy FL13.12 establishes required use mixtures for each land use as shown in the following table.

Land Use Sub-Category	Maximum Residential Uses* (dwelling units)	Minimum Non-residential Uses* (Building Sq. Ft.)
Regional Center and Employment Center (combined**)	7,500-9,000**	9,000,000 - 10,000,000
Resort Development	2,500 - 3,500	400,000 - 500,000
Village Center	2,000 - 3,000	700,000 - 850,000
Residential Neighborhood	9,000 - 11,000	150,000 - 200,000

\* Total residential units and non-residential square footage shall not exceed the committed development program of 24,000 residential units and 11,000,000 square feet of non-residential uses

\*\* Residential Uses in the Employment Center land use subcategory shall not exceed 1,500 units

- Policy FL13.13 allows silviculture and agriculture activities up to the point of building permit issuance.
- Policy FL.13.14 provides guidance for amendments to the ENCPA land use plan.
- Policy FL.13.15 identifies common open space as neighborhood parks, square, mews, greens, trails, and stormwater facilities.
- Policy FL.13.16 requires central water and wastewater service for all development.



## **HOUSING ELEMENT**

### **Policy H.01.04**

*The County shall explore partnerships with the private sector, with the business sector and also community-based non-profit housing providers, to develop affordable housing.*

Staff comment: staff will work with the applicant to develop plans for affordable housing.

### **Policy H.08.01**

*The County shall use the Future Land Use Element of the Comprehensive plan as tool to achieve an appropriate jobs-to-housing balance.*

Staff comment: a jobs-housing balance is built into the adopted sector plan and is also provided for the amendment area. As noted in the American Planning Association's Planning Advisory Service (PAS) Report Number 516, *Jobs-Housing Balance*, better-planned mixed-use communities with balanced jobs and housing can help reduce travel distances and thus limit the growth in trip lengths. These better-planned communities can also provide additional benefits, including a reduction in the amount of land developed overall to meet the needs of growing populations as well as greater efficiency in the provision and use of public infrastructure and services. This PAS report identified a standard target jobs-to-housing ratio of 1.5 jobs per one household, which is slightly higher than the overall ENCPA ratio of 0.84. The ratio does not change due to this amendment since the overall entitlements are not changing. Jobs-housing ratios for the three DSAPs are shown in Table 1.

*Table 1: ENCPA Jobs-Housing Ratio*

	<b>DSAP 1</b>	<b>Proposed CPA21-009 / DSAP 2</b>	<b>DSAP 3</b>	<b>TOTAL APPROVED</b>
UNITS	4,038	14,944	5,018	24,000
JOBS PER UNIT	1.21	1.21	1.21	1.21
JOBS FROM UNITS	4,886	18,082	6,072	29,040
NONRESID. SQ. FT.		1,413,324	2,486,676	11,000,000
NONRESID. SQ. FT. PER JOB	450	450	450	450
JOBS FROM NONRESID. SQ. FT.	15,778	3,141	5,526	24,444
TOTAL JOBS	20,664	21,223	11,598	53,484
JOBS-HSNG. RATIO	3.23	0.17	0.91	0.84

### **Policy H.08.02**

*The County shall discourage patterns of urban sprawl by providing a sufficient supply of housing in close proximity to employment centers within the Urban Development Area as shown on the Development and Preservation Framework found in the background data and analysis for this Plan, promoting a compact mixture of residential and non-residential uses, and where public infrastructure and services exist or are planned.*

Staff comment: this amendment is supported by this policy. The ENCPA employment centers are located west of US 17, but they are close to proposed residential neighborhoods in the amendment area.



***Policy H.09.01***

*The County shall encourage energy-efficient land use patterns within the Urban Development Area as shown on the Development and Preservation Framework found in the background data and analysis for this Plan, promoting a compact mixture of residential and non-residential uses, promote pedestrian and bicycle trips, and contain appropriate density and intensity to support future public transit service, in order to conserve energy and reduce greenhouse gas emissions.*

Staff comment: the compact and connected nature of the proposed development pattern is supported by this policy.

***PROPERTY RIGHTS ELEMENT***

***Policy PR.01.01***

*The County shall consider the following property rights in all local decision making:*

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

Staff comment: staff has worked closely with the applicant to achieve compliance with the comprehensive plan and code-related requirements while also respecting their right to develop their property through their proposed and amended development program.



**PUBLIC SCHOOLS FACILITIES ELEMENT**

**Policy PSF.02.02**

*The County shall require the location of parks, recreation and community facilities in new, planned neighborhoods in conjunction with school sites.*

**Policy PSF.02.03**

*The County shall, where feasible, require the location of parks, recreation and community facilities in existing neighborhoods in conjunction with school sites.*

Staff comment: while future school locations in the amendment area have not been finalized, staff has worked with its parks consultants and the applicant on co-locating schools and parks, and locating both near Village Centers.

**Policy PSF.03.05**

*The County shall coordinate with the School District and the municipalities in the school site selection process to encourage the location of new schools within areas designated for residential development on the FLUM.*

**Policy PSF.03.08**

*The County shall coordinate with the School District to ensure that future school facilities are located outside areas susceptible to hurricane and/or storm damage and/or areas prone to flooding, consistent with Section 1013.36, Florida Statutes and Rule 6A-2, Florida Administrative Code.*

**Policy PSF.04.02**

*The County shall to fullest extent possible, cooperate with the School District to identify new school sites that provide logical focal points for neighborhoods, and serve as the foundation for innovative land design standards.*

**Policy PSF.04.03**

*The County shall coordinate with the School District to ensure the mutual compatibility of land uses in the construction of new schools and planned residential development.*

**Policy PSF.04.04**

*The County shall encourage the location of public schools proximate to residential neighborhoods in all Residential land use categories.*

**Policy PSF.04.05**

*The County shall provide for school sites and facilities within planned neighborhoods unless precluded by existing development patterns.*

**Policy PSF.04.06**

*The County shall support and encourage the location of new elementary and middle schools, unless otherwise required, internal to residential neighborhoods.*

**Policy PSF.04.07**

*The County, in coordination with the School District, shall require the traffic circulation plans in new developments to provide for interconnected vehicle and pedestrian access between neighborhoods, school sites and bus drop-off locations.*



## **RECREATION AND OPEN SPACE ELEMENT**

### **Policy ROS.01.04**

*The County shall acquire, maintain, or manage through agreement, community and regional parks and related recreational facilities to achieve and maintain the adopted levels of service (LOS) shown below.*

Type	Service Radius	Minimum Size	Area /1000 Residents	Access Standard	Other Requirements
Community & Regional Parks - General	County-wide	30 Acres <sup>1</sup>	14 Acres	Community Park: within 1/2-3 miles of every resident  Regional Park: Within 5 miles of every resident in urban/suburban land use designations and within 10 miles of every resident within rural land use designations.	Design Standards as provided in Policy ROS.01.05.
Regional Parks - with Beach Access	County-wide	Variable		10 Acres	At .5 mile linear increments with adequate space for parking
Regional Parks with Boat Facility	County-wide	Variable			1 ramp lane per 5,000 population

<sup>1</sup>Exceptions to the minimum size standard may be made for sites of significant natural or cultural value, as determined by the Planning Director and the Parks Director consistent with the Nassau County Parks Administrative Procedures and Design Manual, as amended from time to time, and based upon the following criteria:

- The site will provide specific public access to a waterway (e.g., beach access, boat ramp, etc.); or
- The site contains a significant historic resource, and the County determines that this resource should be preserved; or
- The site serves to expand an existing public park or other protected natural or conservation lands.

**Staff comment:** In January, 2021 the Board of County Commissioners adopted the Parks, Recreation, and Open Space Master Plan (PROSMP), followed in December, 2021 by the adoption of implementing Comprehensive Plan policies, Land Development Code standards, and the Parks Administrative Procedures and Design Manual. These documents require that new residential developments meet access and size level-of-service standards as well as design standards consistent with adopted park prototypes. The following table demonstrates how the applicant will meet community/regional park acreage levels of service through land dedication. Based on these level-of-service standards, the applicant will be required to provide 533.5 acres of community or regional parks, 152.4 acres of neighborhood parks, and seven boat ramp lanes.

PARK REQUIREMENTS (CPA 21-09 AMENDMENT AREA)- by Population			
Community Population		Population per Unit	Total Population
		2.55	38,107
PARK LEVEL OF SERVICE – PER PROPOSED ORDINANCE			
	Area/1000 Residents	Minimum Park Requirement	Access Standard
Level of Service for Regional/Community Parks	14 Acres	533.50	Within 5 miles of every resident
Level of Service for Neighborhood Parks	4 Acres	152.43	Within .5 miles of every resident
Level of Service for Boat Ramps	1 ramp/5,000 population	7.6 boat ramp lanes	n/a
<b>TOTAL:</b>		<b>685.93</b>	



**Policy ROS.01 .05**

*All community or regional parks shall be constructed to conform to the following design standards:*

*(A) Access. There shall be no legal or physical impediment to bicycle and pedestrian access to a community or regional park.*

*(B) Prototype Park. The Nassau County prototypical community and regional parks are contained within the Nassau County Parks Administrative Procedures and Design Manual, as amended from time to time. The applicable prototype park shall be the guide by which all community and regional parks are designed. The minimum size requirement of a regional park may be modified by Nassau County to accommodate unique natural or cultural features including water-based access based upon the criteria established in Policy ROS.01.04.*

*(C) Minimum land area. While a community or regional park may include wetlands, natural areas, stormwater management facilities and other similar components, the minimum required acreage per LOS standard shall be dry, flat and free of encumbrances that would inhibit establishment of active recreation facilities as defined by the applicable prototype park. This includes, but is not limited to, areas subject to conservation easements, wetland or depression areas, easements that prohibit the use of the easement area for active recreation and other similar encumbrances.*

*(D) Shared Facilities. A community or regional park is not intended to be completely passive nor fully active but rather a blending of recreational opportunities which may, solely at the discretion of Nassau County, include space for third party providers to provide indoor recreation space or aquatics.*

Staff comment: the applicant will be required to meet the above standards.

**Policy ROS.01.06**

*In general, the County shall not seek to acquire neighborhood park facilities. All new development and redevelopment containing a residential component greater than 25 dwelling units, unless otherwise exempt, shall plan, design, and build new neighborhood parks in accordance with the standard established herein. Rural residential developments where all lots have a minimum gross acreage of 5 acres (217,800 square feet) or more are exempt from the neighborhood park requirements.*

*New private neighborhood parks shall be maintained and operated by the developer and/or Homeowners Association, Property Owners Association, Community Development District, or other similar entity. Land and improvements for neighborhood parks shall be provided by new development at the time of initial construction of residential units and shall be reviewed through the Class II development review process outlined in the Land Development Code (LDC). Criteria for the location and design of such facilities shall be as established herein. At the time of application to the County which creates, or will cause to create residential units, the applicant shall demonstrate how the policies defined herein will be satisfied.*



Type	Service Radius	Minimum Size	Area/1000 Residents	Access Standard	Other Requirements
Neighborhood Park	Neighborhood	5 Acres or as approved by the County Planning Director, in accordance with the standards herein and the Nassau County Parks Administrative Procedures and Design Manual, as amended from time to time	4 Acres	Within .5 mile walk of every resident along sidewalks or trails	Design Standards as provided in Policy ROS.01.07

*The required size and location of a neighborhood park shall be based upon the total acreage required as determined in accordance with the acres/resident level of service standard established herein, the ability to meet the Access Standards established herein, and the standards defined in Policy ROS.01.07 of the adopted Nassau County PROSMP. A development may be required to have more than one neighborhood park in order to meet the service standards adopted herein.*

**Policy ROS.01.07**

*All neighborhood parks shall be constructed to conform to the following design standards:*

*(A) Access. Neighborhood parks must be easily accessible from safe and adequate bicycle and pedestrian facilities, as determined by Nassau County, from their home to the neighborhood park unimpeded by a physical or legal impediment.*

*(B) Prototype neighborhood park. The Nassau County prototypical neighborhood park and design principles are contained within the Nassau County Parks Administrative Procedures and Design Manual, as amended from time to time. These prototype park and design principles shall be the guide by which all neighborhood parks are designed. Based on the level of service standard required in Policy ROS.01.06, when a development generates less than 5 acres of demand for a neighborhood park, alternate prototypes, principles and standards are provided in the Parks Administrative Procedures and Design Manual that shall guide park design.*

*(C) Street frontage. At least two sides of the park, or thirty-three percent (33%) of the total perimeter of the park, whichever is greater, must abut a street.*

*(D) Minimum land area. While a neighborhood park may include wetlands, natural areas, stormwater management facilities and other similar components, the minimum required acreage per LOS standard shall be dry, flat and free of encumbrances that would inhibit establishment of active recreation facilities as defined by the Nassau County prototype Neighborhood Park. This includes, but is not limited to, areas subject to conservation easements, wetland or depression areas, easements that prohibit the use of the easement area for active recreation, and other similar encumbrances. In cases where a utility easement is present, the utilities must be located underground and the easement holder shall provide a written statement to the Planning Department approving the use of the area for recreation as shown on the correlating site plan for the individual park.*

*(E) Shared facilities. Stormwater treatment facilities (SWMF) such as retention and detention ponds may be designed within a neighborhood park subject to the applicable standards for neighborhood parks but shall not count towards the minimum acreage LOS standard in ROS.01.06.*



*Where neighborhood parks have an area of five acres or greater, SWMFs may be credited towards meeting the minimum area standards defined in Sec. 29-46(b)(1)b.i. subject to the following:*

*(1) SWMFs shall be limited to the lesser of 12% of the total park area. or the actual required volume capacity for the pond as determined by Nassau County Engineering Services based on a review of the project's submitted drainage calculations.*

*(2) SWMFs shall be activated and incorporated as contributing and functioning elements of the park through the inclusion of ADA compliant multi-use trails. fitness stations, picnic area. and other similar active recreation amenities.*

*(3) SWMFs shall not be encircled, in whole or in part. by chain-link fencing or a similar barrier.*

Staff comment: the applicant will be required to meet these standards.

**Policy ROS.01.09**

*All residential development within the County shall be required to meet the level of service standards in Policy ROS.01.04 through either the dedication of park land to the County or the payment of impact fees for park land to the County. It shall be the County's sole decision to require dedication of land to meet the level of service standards established in Policy ROS.01.04 and further detailed in the Nassau County Parks Administrative Procedures and Design Manual, as amended from time to time, or accept payment of impact fees for park land in accordance with the adopted Impact Fee Regulations (Sec. 34-21, Nassau County Code) to mitigate new demand placed on the Regional Park system. After making an individualized determination that dedication of land is related both in nature and extent to the impact of the proposed development based on the factors set out below, the Planning Director, in coordination with the Parks Director, shall have the authority to mandate the dedication of land in accordance with this policy or accept the payment of impact fees for park land.*

*Any dedication of land for a Regional Park shall be eligible for park land impact fee credits as defined in the adopted Impact Fee Regulations (Sec.34-21, Nassau County Code).*

*The following factors shall be evaluated and used to guide the County's decision-making process to require the dedication of land or accept payment of impact fees for park land:*

*(A) Acreage Size of Demand Generated. The total acreage demand generated by the proposed development to meet the level of service standards established in Policy ROS.01.04 and the relationship of this total acreage demand to the minimum and/or ideal acreages of a Regional Park as defined herein and further detailed in the Nassau County Parks, Recreation, and Open Space Master Plan and the ability of any potential park within the development to provide the prototypical Regional Park facilities defined in Nassau County Parks Administrative Procedures and Design Manual, as amended from time to time.*

*(B) Site Characteristics. The physical characteristics of a potential Regional Park site and its capacity to support the uses associated with a Regional Park as defined herein and further detailed in the Nassau County Parks, Recreation, and Open Space Master Plan and the Nassau County Parks Administrative Procedures and Design Manual, as amended from time to time. These characteristics may include, but are not limited to:*

- Available multi-modal access;*
- Adequate buffers to minimize negative impacts to adjacent neighborhoods;*
- Site configuration, topography, soils, geometry, and vegetation that are conducive to the construction of both active and passive recreation facilities;*
- Adequate utilities to support the proposed facilities and amenities;*



- *Scenic beauty and vegetation;*
- *Estimated costs to develop the site; and*
- *Anticipated local, state, regional or federal permitting requirements.*

*(C) Expansion of Service. The ability of the potential Regional Park to expand or provide additional service in unserved or underserved areas.*

*(D) Location (General). Proximity/relationship of the potential Regional Park to other existing, potential, or planned County Parks/Preserves, State Park, State Forest, National Forest, or other similar publicly held recreation or conservation lands. Relationship of the potential Regional Park to unique environmental features, bodies of water and/or cultural resources.*

*(E) Location (Water Access). The potential Regional Park's relationship to waterways and the Atlantic Ocean. Any residential development or redevelopment that produces an increased demand on the Regional Park system with frontage or access on a navigable waterway, river shore, or the beaches of the Atlantic Ocean shall, unless otherwise determined by Nassau County to not be in the best interests of the citizens, partner with Nassau County to dedicate land, design, and build new Regional Parks and facilities providing access to waterways, shores and beaches. It is the expressed intent of Nassau County to acquire properties that provide access to navigable waterways and the Atlantic Ocean.*

*(F) Connectedness. The ability of the potential Regional Park to create a logical expansion of, or connection between, public holdings and/or facilities. This may include creating linear based ecological corridors or recreation facilities that expand existing, planned, or potential Regional Parks and improve the overall service provided to the citizens of Nassau County.*

*(G) Future Potential. The ability to expand the potential Regional Park in the future as adjacent lands develop or are acquired.*

*(H) Implementation of Community Planning Efforts. Relationship between the potential Regional Park and any existing Area Plan, Corridor Plan, Master Plan, Master Planned Community, Master Planned Development, Sector Plan, Development of Regional Impact, or other community planning initiative or exercise.*

*(I) All land dedications must be proportional to the residential development's anticipated impacts on the County's Regional Park system. No residential development will be required to dedicate park land in excess of their impact as determined by the level of service standards in Policy ROS.01.04.*

Staff comment: the County has contracted with its parks consultants to identify general locations of proposed community and regional parks, and within those general locations to ensure the above standards are met, and that proposed parklands can be usable through the development of conceptual park site plans.

***Policy ROS.01.16***

*Whenever possible, recreation sites should be established with multi-use purposes to provide both recreation facilities and to ensure preservation or conservation of environmentally sensitive lands.*

Staff comment: parks have been located adjacent to CHN in order to provide for the complimentary goals of recreation and conservation.



**Policy ROS.02.01**

*The County will provide for adequate vehicular parking and bicycle racks at all new County recreation areas and will ensure the installation of such facilities at the time of the reconstruction or additions to existing County recreation areas.*

**Policy ROS.02.02**

*Sidewalks, bicycle paths and multipurpose trails shall be provided at the time of construction or reconstruction as defined in the County Land Development Code along public roads which provide access from neighborhoods to County parks.*

**Policy ROS.02.03**

*The County will provide accessible parking and barrier-free access to all types of County recreational facilities.*  
Staff comment: all future development must meet the above park standards.

**Policy ROS.02.05**

*As a condition of development approval, all developers constructing recreational facilities shall be required to provide adequate access of all kinds to recreational facilities and public water bodies to meet Objective ROS.02.*

**Policy ROS.02.06**

*The County shall provide in the Land Development Code a requirement that any access to public beaches and shorelines or other recreational sites required as a condition of concurrency or development approval, shall be of sufficient size to accommodate adequate vehicular parking and bicycle racks within the access easement.*

Staff comment: the amendment area includes multiple opportunities to provide access to St Marys River and Lofton Creek shorelines that include boat ramps, kayak launches, sufficient parking, and appropriate park facilities.

**Policy ROS.02.08**

*The County shall consider greenways to link existing and proposed nature reserves, parks, cultural and historic sites with each other. Greenways may include pedestrian and/or bike trails.*

Staff Comment: the CHN presents an opportunity for the County to work with the applicant and successors to develop a greenway system with these linkages.

**Policy ROS.03.03**

*PUD and other mixed use developments shall be encouraged to provide large areas of open space and to provide recreation facilities beyond those necessary to be concurrent with the additional community needs they create.*

Staff Comment: the applicant will meet their community/regional park level of service through land dedication, and will designate additional open space and conservation facilities through the required neighborhood parks and the 7,000+-acre CHN which will offer walking and bicycling trails.



## **TRANSPORTATION ELEMENT**

### **Policy T.02.03**

*The transportation improvements identified in the Mobility Plan for the ENCPA and its adopted Detailed Specific Area Plans (DSAPs) shall be included as long term (unfunded) needs on the Future Transportation Map Series (Map FTMS-5) and shall be considered by the County when it reviews and updates the adopted Mobility Plan and the Schedule of Capital Improvements.*

Staff comment: Map FTMS-5 has been updated to reflect the revised arrangement and addition of mobility plan roads in the ENCPA areas, as part of the companion amendment CPA21-010.

### **Policy T.04.01**

*Bicycle and pedestrian facilities shall be incorporated into transportation improvement projects. This shall include provision of wide paved shoulders and sidewalks on roadway segments, especially those identified as part of the bicycle route network as designated on the Bicycle Route Network shown on Maps FTMS-7 and -8. The County may adopt a sidewalk and trail fee-in-lieu policy for the construction of sidewalks.*

#### **Policy T.04.02**

*Nassau County proposed trails as shown on Map FTMS-9, shall be implemented by requiring developments to construct that section related to their development. Such development may receive appropriate credit from recreation impact fees and/or mobility fees. The County may adopt a sidewalk and trail fee-in-lieu policy for the construction of trails.*

Staff comment: Maps FTMS-7 and 8 have been updated to reflect the proposed bicycle and pedestrian facilities in the ENCPA areas, as part of the companion amendment CPA21-010. These policies will be amended to reflect the recent adoption of the sidewalk and trail fee-in-lieu policy (should this reference ORD22-001?).

### **Policy T.04.04**

*The County shall work with developers to establish an interconnected system for the safe, convenient and efficient movement of pedestrian and bicycle traffic.*

Staff Comment: the applicant was required to submit a traffic study for this amendment. The first submitted study was flawed due to the timing of the traffic counts, which occurred during the widening of SR 200 and when school was out, which are both anomalous/atypical circumstances. Engineering Services requested that the traffic counts be re-done, which they were in February, 2022, a time after which SR 200 construction was completed and school was back in. The background traffic and additional traffic shown by each zone data was not provided with trip generation tables. Not having this data makes it impossible for a thorough review.

In addition to the missing background data in the traffic study, the proposed ENCPA Mobility Improvement Map shows numerous locations where connections to external network roads have been relocated or added. The external connections do match the connections as currently adopted. One of the three original connections was relocated and there are three additional connections to external roadways. The information in the consistency analysis and narrative regarding the relocation of the CR108/Chester Road connection is helpful, but similar explanation language regarding the Blount's Branch connection to Pages Dairy Rd., the re-alignment of the CR 108 intersection at US 17, and any other relocated connections need to be included in the narrative of the CPA



document. Staff and the applicant may be familiar with the reasons for the change but this information should be documented in the CPA narrative.

**Policy T.04.05**

*The County will consider and encourage, where feasible, greenways to link existing and proposed nature reserves, parks, cultural and historic sites with each other.*

**Policy T.04.06**

*The County should work with utility companies, to establish trails through utility corridors to create a safe, interconnected system of trails for recreational and transportation uses, outside of designated right-of-ways.*

**Policy T.05.01**

*Encourage Circulation within Development. Development shall include features and provisions, which encourage internal automobile circulation, bicycle use, pedestrian movement, and other features to minimize utilization of the major roadway network.*

**Policy T.05.03**

*Access to Arterial and Collector Roadways. Development, which provides access directly to arterial and collector roadways shall be designed to:*

*A) Provide adequate and safe entrance intersection(s) including turn lanes, acceleration/deceleration lanes, signalization, signage, and pavement marking as appropriate;*

*B) Prevent the creation of hazardous traffic conditions, such as excessive curb cuts, which impede traffic flow.*

Staff comment: future development will be subject to these policies.