



Alachua County Board of County Commissioners

Marihelen Wheeler, *Chair*
Anna Prizzia, *Vice Chair*
Charles S. Chestnut, IV
Ken Cornell
Raemi Eagle-Glenn

Administration
Michele L. Lieberman
County Manager

August 26, 2022

Via email: poel@cityofgainesville.org

The Honorable Lauren Poe, Mayor
City of Gainesville
P.O. Box 490, Station 19
Gainesville, FL 32627-0490

RE: Comments on Proposed Comprehensive Plan Amendment Transmitted for Expedited State Review (DEO Reference Number 22-3 ESR/City Legislative Matter 211357)

Dear Mayor Poe:

Thank you for the opportunity to review and comment on the City's proposed Comprehensive Plan Amendment referenced above through the Expedited State Review process pursuant to Chapter 163.3184, Florida Statutes. The County received the City's letter dated August 6, 2022 with the transmitted amendments on August 12, 2022.

The County appreciates the City's intent behind the proposed amendment to address affordable housing and equity issues within our community, however, the County is concerned about the potential for widespread impacts that could result from this amendment, and that these impacts have not been identified or considered as part of the supporting data and analysis for the amendment.

The proposed Comprehensive Plan amendment would eliminate the Single Family Residential Future Land Use Category from the City's Comprehensive Plan. It would also change the Future Land use designation of all areas within the City currently having the Single Family Residential designation to the Low Density Residential designation.

The Single Family Residential designation that is proposed to be eliminated allows for only single family detached dwellings at a maximum density of 8 units per acre. The Low Density Residential Future Land Use designation, which would replace the Single Family Residential designation, allows for single family residential, zero lot line development, and small scale multi-family development at a maximum density of 15 units per acre. This proposed change would affect several thousand acres of land distributed throughout the City and would allow for potential significant increases in residential density within these areas.

In accordance with Section 163.3184, Florida Statutes, County comments on proposed Comprehensive Plan amendments shall be in the context of the relationship and effect of the proposed plan amendments on the County Plan.

Florida Statutes Section 163.3177(1)(f) provides in part that comprehensive plan amendments shall be based upon relevant and appropriate data and an analysis by the local government. The City has not provided data and analysis on the full extent of potential impacts of the proposed amendment. Specifically, data and analysis has not been provided regarding how the proposed amendment would impact land use compatibility with surrounding existing and future land uses, and particularly for those areas that are within unincorporated Alachua County. Also, no data and analysis has been provided on the need for publicly funded infrastructure, facilities, and services, some of which are owned, operated and maintained by Alachua County within or adjacent to some of the affected areas. In the absence of appropriate data and analysis, the potential impacts of the proposed amendment on Alachua County cannot be determined.

We recommend that the City delay consideration of adoption of this Comprehensive Plan amendment until the full extent of its potential impacts have been identified and evaluated through appropriate data and analysis. The proposed amendment should then react appropriately to the data and analysis in accordance with Section 163.3177(1)(f), Florida Statutes.

If you have any questions or would like to discuss this matter, please contact me.

Sincerely,



Marihelen Wheeler, Chair
Alachua County Commission
Chr22.040

MW/JH/bc

cc: Board of County Commissioners
Michele Lieberman, County Manager
Sylvia Torres, County Attorney
Mari K. Daniels, Acting Assistant County Manager
D. Ray Eubanks, Florida Department of Economic Opportunity
Scott Koons, North Central Florida Regional Planning Council Executive Director
City of Gainesville Mayor and Commissioners
Cynthia Curry, City of Gainesville Interim City Manager
Andrew Persons, City of Gainesville Sustainable Development Department Director