

MEMORANDUM

February 8, 2001

TO : DIVISION OF RECORDS AND REPORTING (BAYO)  
FROM : DIVISION OF WATER AND WASTEWATER (REDEMANN) *RPR BSM PD*  
RE : DOCKET NO. 990817-WS; APPLICATION BY FLORIDA WATER SERVICES CORPORATION FOR EXPANSION OF WATER AND WASTEWATER TERRITORY IN NASSAU COUNTY, FLORIDA.

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Enclosed please find a copy of the Department of Community Affairs Objections, Recommendations and Comments dated February 2, 2001, which should be placed in the Docket File.

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cc: Department of Legal Services (Christensen)  
Division of Records and Reporting (Security File)

DOCUMENT NUMBER - DATE  
01934 FEB-95  
FPSC-RECORDS/REPORTING



STATE OF FLORIDA  
**DEPARTMENT OF COMMUNITY AFFAIRS**

*"Dedicated to making Florida a better place to call home"*

JEB BUSH  
 Governor

STEVEN M. SEIBERT  
 Secretary

February 2, 2001

The Honorable Nick D. Deonas  
 Chairman, Nassau County  
 Board of County Commissioners  
 Post-Office Box 1010  
 Fernandina Beach, Florida 32035

Dear Chairman Deonas:

The Department has completed its review of the proposed Comprehensive Plan Amendment for Nassau County (DCA No. 01-1ER), which was received on November 22, 2000. Copies of the proposed amendment have been distributed to appropriate state, regional and local agencies for their review and their comments are enclosed.

I am enclosing the Department's Objections, Recommendations and Comments (ORC) Report, issued pursuant to Rule 9J-11.010, Florida Administrative Code (F.A.C.). The issues identified in this Objections, Recommendations and Comments Report include objections to eight of the proposed Future Land Use Map changes because of concerns with increased density in a Coastal High Hazard Area, interference with the Fernandina Beach Airport, traffic impacts, and encouragement of sprawl. The report also includes objections to a number of text amendments in the Future Land Use, Traffic Circulation, Public Facilities, Conservation, and Capital Improvements elements because of concerns with standards for the application of the new activity center land use categories, wetlands buffer distance, increasing density in the Coastal High Hazard Area, school siting, needed transportation policies, stormwater standards, and protection for endangered species. It is very important that the adopted plan amendment address these issues identified in the Department's ORC Report.

While a number of objections have been identified, the Department commends the County for its progress toward improved planning and management of the SR A1A corridor. The overall strategy appears sound; although additional detail is in order.

Upon receipt of this letter, Nassau County has 120 days in which to adopt, adopt with changes, or determine that the County will not adopt the proposed amendment. The process for adoption of local government comprehensive plan amendments is outlined in s. 163.3184, Florida Statutes (F.S.), and Rule 9J-11.011, F.A.C. The County must ensure that all ordinances adopting comprehensive plan amendments are consistent with the provisions of Chapter 163.3189(2)(a), F.S.

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The Honorable Nick D. Deonas  
February 2, 2001  
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Within ten working days of the date of adoption, Nassau County must submit the following to the Department:

Three copies of the adopted comprehensive plan amendments;

A listing of additional changes not previously reviewed;

A listing of findings by the local governing body, if any, which were not included in the ordinance; and

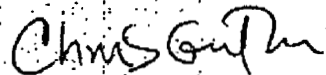
A statement indicating the relationship of the additional changes to the Department's Objections, Recommendations and Comments Report.

The above amendment and documentation are required for the Department to conduct a compliance review, make a compliance determination and issue the appropriate notice of intent.

In order to expedite the regional planning council's review of the amendments, and pursuant to Rule 9J-11.011(5), F.A.C., please provide a copy of the adopted amendment directly to the Executive Director of the Northeast Florida Regional Planning Council.

Please contact Paul Darst, Planner IV, or James Stansbury, Community Program Administrator, at (850) 487-4545 if we can be of assistance as you formulate your response to this Report.

Sincerely yours,



Charles Gauthier, AICP  
Chief, Bureau of Local Planning

CG/pds

Enclosures: Objections, Recommendations and Comments Report  
Review Agency Comments

cc: Mr. Gus Rappold, County Planner, Nassau County  
Mr. Brian D. Teeple, Executive Director, Northeast Florida Regional Planning Council

DEPARTMENT OF COMMUNITY AFFAIRS  
OBJECTIONS, RECOMMENDATIONS AND COMMENTS

NASSAU COUNTY  
AMENDMENT 01-1ER

February 2, 2001  
Division of Community Planning  
Bureau of Local Planning

## INTRODUCTION

The following objections, recommendations and comments are based upon the Department's review of Nassau County's proposed 01-1ER amendment to its comprehensive plan pursuant to Section 163.3184, Florida Statutes (F.S.).

Objections relate to specific requirements of relevant portions of Chapter 9J-5, Florida Administrative Code (F.A.C.), and Chapter 163, Part II, F.S. Each objection includes a recommendation of one approach that might be taken to address the cited objection. Other approaches may be more suitable in specific situations. Some of these objections may have initially been raised by one of the other external review agencies. If there is a difference between the Department's objection and the external agency advisory objection or comment, the Department's objection would take precedence.

The local government should address each of these objections when the amendment is resubmitted for our compliance review. Objections which are not addressed may result in a determination that the amendment is not in compliance. The Department may have raised an objection regarding missing data and analysis items which the local government considers not applicable to its amendment. If that is the case, a statement justifying its non-applicability pursuant to Rule 9J-5.002(2), F.A.C., must be submitted. The Department will make a determination on the non-applicability of the requirement, and if the justification is sufficient, the objection will be considered addressed.

The comments which follow the objections and recommendations are advisory in nature. Comments will not form bases of a determination of non-compliance. They are included to call attention to items raised by our reviewers. The comments can be substantive, concerning planning principles, methodology or logic, as well as editorial in nature dealing with grammar, organization, mapping, and reader comprehension.

Appended to the back of the Department's report are the comment letters from the other state review agencies and other agencies, organizations and individuals. These comments are advisory to the Department and may not form bases of Departmental objections unless they appear under the "Objections" heading in this report.

**Objections, Recommendations and Comments Report**

**for**

**Nassau County 01-1ER Amendments**

**2 February 2001**

**O B J E C T I O N S**

**Future Land Use Map Amendment A  
Crane Island**

This 108-acre island is proposed to change from Conservation to Medium-Density Residential. Crane Island is currently designated Conservation on the Future Land Use Map, which allows a maximum of one dwelling unit per 5 acres. The proposed change to Medium-Density Residential would allow 2 to 3 units per acre on this 108-acre site, or 216 to 324 dwelling units.

Direct population concentrations away from known or predicted coastal high-hazard areas

Crane Island is entirely located in the Coastal High Hazard Area and is subject to inundation in a Category 1 storm. Changing the Future Land Use Map designation for Crane Island to allow higher residential density in the Coastal High Hazard Area is inconsistent with s. 163.3178, F.S., and s. 9J-5.012(3)(b), F.A.C.

The amendment is inconsistent with other parts of the Nassau County comprehensive plan. Changing the Future Land Use Map designation for Crane Island to allow higher residential density in the Coastal High Hazard Area is inconsistent with Nassau County Coastal Management Objective 5.07, which requires that, upon plan adoption the County, through its Future Land Use Map and Development Orders, shall direct population concentrations away from known or predicted coastal high hazard areas. It is also inconsistent with Coastal Management Policy 5.05.06-a, which requires that the county shall not allow an overall increase in the density of land use within the Coastal High Hazard Area, in order to maintain the maximum evacuation time.

Florida Statutes: ss. 163.3177(2), 163.3177(6), 163.3178

Florida Administrative Code: ss. 9J-5.006(3)(b)5, 9J-5.012(3)

State Comprehensive Plan: ss. 187.201(7), 187.201(9), 187.201(16), F.S.

Recommendation: Nassau County should not adopt the amendment. As an alternative, the County may create a new land use category and apply it to the subject property, provided that residential potential is not increased.

Protection of ports, airports or related facilities from the encroachment of incompatible land uses

The Florida Department of Transportation and the City of Fernandina Beach have pointed out that the residential development of Crane Island would interfere with the safe operation of the Fernandina Beach Municipal Airport. The runway clear zone area for the extended Runway 1113 covers a significant proportion of the island north end. The Florida Department of Transportation states that residential development of the island is not compatible with airport operation, either as it exists or as it is planned. For public health, safety and welfare

purposes, Chapter 333 of the Florida Statutes prohibits residential construction as well as most other types of development in runway clear zones. The clear zone public safety protection and the airport noise compatibility controls are applicable to all local governments in the vicinity of public airports.

Intergovernmental Coordination Objective 8.02 in the Nassau County comprehensive plan states that the County shall ensure that planning activities projected in the comprehensive plan for Fernandina Beach are coordinated with the comprehensive plans for Amelia Island and the remainder of the county as well as those in adjacent counties. Intergovernmental Coordination Objective 8.04 states that the County shall ensure that proposed development in its plan is in compliance with plans of adjacent local governments and regional and state plans. The proposed FLUM amendment is inconsistent with these plan objectives.

The City of Fernandina Beach provided comments to the Department stating that the County's airport zoning ordinance (Article 28) prohibits the use of any land within any zones established by the ordinance in such a manner as to interfere with the operation of airborne aircraft.

Florida Statutes: ss. 163.3177(6)(a), 163.3177(6)(h), 163.3177(6)(j)

Florida Administrative Code: s. 9J-5.019(4)(c)21

State Comprehensive Plan: ss. 187.201(16), 187.201(18), F.S.

Recommendation: The County should not adopt the amendment. As an alternative, the County may create a new land use category and apply it to the subject property, provided that residential potential is not increased.

#### **Future Land Use Map Change E New Courthouse and Jr. College**

##### **Inadequate Data and Analysis Regarding Transportation Impacts**

These two sites, comprising 100 acres, are proposed to change from Agriculture to Public Buildings and Grounds. An existing access road, community water and sewer serve the new courthouse and junior college sites. Development of these sites would generate traffic on SR 200, I-95, and US 17. The most directly affected segments of I-95 are projected by the Florida Department of Transportation to operate at Level of Service "C" by 2005. The Florida Department of Transportation minimum level of service for this facility is Level of Service "B." The most directly affected segment of US 17 is projected by the Florida Department of Transportation to operate at Level of Service "F" by 2010.

The County has not supported the proposed change with adequate data and analysis on roadway facilities pursuant to s. 9J-5.019(3)(f), F.A.C. The County did not include an analysis assessing the impacts to roadway facilities based on projected traffic on impacted roadways through the planning period and did not include traffic data and analysis demonstrating coordination of traffic facilities with the proposed land uses. Therefore the amendment is not consistent with facility planning requirements in ss. 9J-5.019(4)(b)2 and 9J-5.0055(3), F.A.C.

Florida Statutes: ss. 163.3177(2), 163.3177(6)(a), 163.3177(6)b

Florida Administrative Code: ss. 9J-5.005(2), 9J-5.005(5)a, 9J-5.005(5)b, 9J-5.005(6), 9J-5.019(3)(f), 9J-5.019(4)(b), 9J-5.019(4)(c), 9J-5.0055(3)

State Comprehensive Plan: ss. 187.201(16), 187.201(18), 187.201(20), F.S.

**Recommendation:** The County should analyze potential impacts on Intrastate and State Highway System facilities. Based on this analysis the amendment should be revised or appropriate mitigation identified, as necessary.

**Future Land Use Map Change M  
West Side of Amelia Island**

Direct population concentrations away from known or predicted coastal high-hazard areas

This 5-acre site on the barrier island is proposed to change from Commercial to Medium-Density Residential. This amendment would promote additional population in the Coastal High Hazard Area. This is inconsistent with Rule 9J-5.012(3)(b)6, F.A.C., and with Nassau County Coastal Management Objective 5.07 and Coastal Management Policy 5.05.06-a.

Florida Statutes: ss. 163.3177(2), 163.3177(6), 163.3178

Florida Administrative Code: ss. 9J-5.006(3)(b)5, 9J-5.012(3)

State Comprehensive Plan: ss. 187.201(7), 187.201(9), 187.201(16), F.S.

**Recommendation:** Nassau County should not adopt the amendment.

**Future Land Use Map Change Q  
Local Activity Center**

Inadequate Data and Analysis Regarding Transportation Impacts

The Local Activity Centers proposed in this Future Land Use Map amendment are four circular areas of approximately 0.25-mile radius located within the A1A Access Management Overlay District, centered on the SR A1A/SR 200 intersections with South SR 107 and North SR 107, US 17, and SR 200A.

A Local Activity Area or Center (LAC) is a proposed new land use category that will be designated and depicted on the Future Land Use Map. It is to consist of the area surrounding a minor highway intersection and extending out about one-quarter mile from the intersection. Development in this area may be 20 percent more dense or intense than the County-wide adopted land use category and may include a mix of land uses as allowed in the medium- and high-density residential, commercial, and industrial land use designations when allowed at the discretion of the Planning and Zoning Board.

Development of the LACs will generate increased traffic on SR A1A. Segment 15 of SR A1A is projected by the Department of Transportation to operate at Level of Service "F" by 2005.

The County has not supported the proposed change with adequate data and analysis on roadway facilities pursuant to s. 9J-5.019(3)(f), F.A.C. The County did not include an analysis assessing the impacts to roadway facilities based on projected traffic on impacted roadways through the planning period and did not include traffic data and analysis demonstrating coordination of traffic facilities with the proposed land uses. Therefore the amendment is not consistent with facility planning requirements in ss. 9J-5.019(4)(b)2 and 9J-5.0055(3), F.A.C.

Florida Statutes: ss. 163.3177(2), 163.3177(6)(a), 163.3177(6)(b)

Florida Administrative Code: ss. 9J-5.005(2), 9J-5.005(5)a, 9J-5.005(5)b, 9J-5.005(6), 9J-5.019(3)(f), 9J-5.019(4)(b), 9J-5.019(4)(c), 9J-5.0055(3)

State Comprehensive Plan: ss. 187.201(16), 187.201(18), 187.201(20), F.S.



Recommendation: The County should analyze the amendment's potential impacts on Intrastate and State Highway System facilities. Based on this analysis the amendment should either be revised or appropriate mitigation identified, as necessary.

**Future Land Use Map Change R  
Regional Activity Center**

A Regional Activity Area or Center (RAC) is a proposed new land use category that will be designated and depicted on the Future Land Use Map. It is to consist of an area in proximity to a major highway intersection, where commercial, industrial, and residential growth has occurred or is very likely to occur in the next 10 years. This area shall be centered on the highway intersection and extend out about 1 mile from the intersection. Development in this area may be 30 percent more dense or intense than the County-wide adopted land use category and may include a mix of land uses as allowed in the medium- and high-density residential, commercial, and industrial land use designations when allowed at the discretion of the Planning and Zoning Board.

The RAC proposed in this Future Land Use Map amendment is a circular area of 1-mile radius, centered on the SR 200/I-95 intersection. The RAC is a part of the A1A Access Management Overlay District. The County states that this designation will improve traffic conditions by controlling access to SR A1A/SR 200. Staff notes that the segments of I-95 on either side of the intersection with SR 200, identified by the Florida Department of Transportation as segments 32 and 33 (Intrastate Highway System section no. 74060) are projected by the Florida Department of Transportation to operate at Level of Service "C" by 2005. The Florida Department of Transportation minimum level of service for this Florida Intrastate Highway System facility is "B."

The County has not supported the proposed change with adequate data and analysis on roadway facilities pursuant to 9J-5.019(3)(f), F.A.C. The County did not include an analysis assessing the impacts to roadway facilities based on projected traffic on impacted roadways through the planning period and did not include traffic data and analysis demonstrating coordination of traffic facilities with the proposed land uses. Therefore, the amendment is not consistent with facility planning requirements in 9J-5.019(4)(b)2, and 9J-5.0055(3), F.A.C.

Florida Statutes: ss. 163.3177(2), 163.3177(6)(a), 163.3177(6)(b), 163.3177(8)

Florida Administrative Code: ss. 9J-5.005(2), 9J-5.005(5)a, 9J-5.005(5)b, 9J-5.005(6), 9J-5.019(3)(f), 9J-5.019(4)(b), 9J-5.019(4)(c), 9J-5.019(5), 9J-5.0055(3), 9J-5.006(4)

State Comprehensive Plan: ss. 187.201(16), 187.201(18), 187.201(20), F.S.

Recommendation: The County should analyze the amendment's potential impacts on Intrastate and State Highway System facilities. Based on this analysis the amendment should either be revised or appropriate mitigation identified, as necessary.

**Future Land Use Map Change S  
Municipal Activity Center**

A Municipal Activity Area or Center (MAC) is a proposed new land use category that will be designated and depicted on the Future Land Use Map. It shall consist of the area surrounding an incorporated municipality and shall extend out about one-half mile from the municipal boundary. Development in this area may be 25 percent more dense or intense than the County-wide adopted land use category and may include a mix of land uses as allowed in the

medium- and high-density residential, commercial, and industrial land use designations when allowed at the discretion of the Planning and Zoning Board.

The MACs proposed in this Future Land Use Map amendment would encompass areas near Callahan and Hilliard. The MACs proposed for Hilliard are not well defined on the Future Land Use Map, but they appear to extend more than one-half mile from the town. The MACs proposed for Callahan also appear to extend more than one-half mile from the town. This does not conform with the definition for the MAC land use category and therefore is internally inconsistent with the rest of the comprehensive plan.

The County states that the existing municipal water and sewer and traffic facilities are adequate to serve these areas through 2010, but has not supplied sufficient data and analysis to support this conclusion.

Staff notes that the MACs apparently will influence DOT-identified segments 10, 11, and 12 of US 301 (State Highway System section no. 74030). These segments are projected by DOT to operate at Level of Service "A" or "B" by 2005.

The County has not supported the proposed change with adequate data and analysis on roadway facilities pursuant to s. 9J-5.019(3)(f), F.A.C. The County did not include an analysis assessing the impacts to roadway facilities based on projected traffic on impacted roadways through the planning period and did not include traffic data and analysis demonstrating coordination of traffic facilities with the proposed land uses. Therefore, the amendment is not consistent with facility planning requirements in ss. 9J-5.019(4)(b)2 and 9J-5.0055(3), F.A.C.

Florida Statutes: ss. 163.3177(2), 163.3177(6)(a), 163.3177(6)b

Florida Administrative Code: ss. 9J-5.005(2), 9J-5.005(5)a, 9J-5.005(5)b, 9J-5.005(6), 9J-5.019(3)(f), 9J-5.019(4)(b), 9J-5.019(4)(c), 9J-5.0055(3)

State Comprehensive Plan: ss. 187.201(16), 187.201(18), 187.201(20), F.S.

Recommendation: The County should analyze the amendment's potential impacts on Intrastate and State Highway System facilities. Based on this analysis the amendment should either be revised or appropriate mitigation identified, as necessary.

#### **Future Land Use Map Change V. East Side of Chester Rd from SR 200 North**

This 527-acre site is proposed to change from Low-Density Residential to Medium-Density Residential. Development of this parcel will generate traffic on segment 15 of SR A1A/SR 200 of the Florida State Highway System. This segment is projected by the Department of Transportation to operate at Level of Service "F" by 2005.

The County has not supported the proposed change with adequate data and analysis on roadway facilities pursuant to s. 9J-5.019(3)(f), F.A.C. The County did not include an analysis assessing the impacts to roadway facilities based on projected traffic on impacted roadways through the planning period and did not include traffic data and analysis demonstrating coordination of traffic facilities with the proposed land uses. Therefore, the amendment is not consistent with facility planning requirements in ss. 9J-5.019(4)(b)2 and 9J-5.0055(3), F.A.C.

Florida Statutes: ss. 163.3177(6)(a), 163.3177(6)b

Florida Administrative Code: ss. 9J-5.005(2), 9J-5.005(5)a, 9J-5.005(5)b, 9J-5.005(6), 9J-5.019(3)(f), 9J-5.019(4)(b), 9J-5.019(4)(c), 9J-5.0055(3)

State Comprehensive Plan: ss. 187.201(16), 187.201(18), 187.201(20), F.S.

Recommendation: The County should analyze the amendment's potential impacts on Intrastate and State Highway System facilities. Based on this analysis the amendment should either be revised or appropriate mitigation identified, as necessary.

#### **Future Land Use Map Change W East Side of Edwards Rd South of SR 200**

This 655-acre site is proposed to change from Agricultural to Low-Density Residential. The justification for this land use change is that this residential area will support the regional node being developed around the I-95 and SR 200 intersection. The node is being developed with a community college and the new courthouse and associated administrative facilities.

A re-built road provides improved access to this site. Water and sewer facilities will be provided privately. Affected roads are said to be adequate to serve this area through 2010, but no data is supplied. Development of this parcel will generate traffic on segments 32 and 33 of I-95 (Florida Intrastate Highway System). These segments are projected by the Department of Transportation to operate at Level of Service "C" by 2005. The Department of Transportation minimum level of service for this facility is Level of Service "B."

The County has not supported the proposed change with adequate data and analysis on roadway facilities pursuant to s. 9J-5.019(3)(f), F.A.C. The County did not include an analysis assessing the impacts to roadway facilities based on projected traffic on impacted roadways through the planning period and did not include traffic data and analysis demonstrating coordination of traffic facilities with the proposed land uses. Therefore, the amendment is not consistent with facility planning requirements in ss. 9J-5.019(4)(b)2 and 9J-5.0055(3), F.A.C.

Florida Statutes: ss. 163.3177(2), 163.3177(6)(a), 163.3177(6)b, 163.3180(10)

Florida Administrative Code: ss. 9J-5.005(2), 9J-5.005(5)a, 9J-5.005(5)b, 9J-5.005(6), 9J-5.019(3)(f), 9J-5.019(4)(b), 9J-5.019(4)(c), 9J-5.0055(3)

State Comprehensive Plan: ss. 187.201(16), 187.201(18), 187.201(20), F.S.

Recommendation: The County should analyze the amendment's potential impacts on Intrastate and State Highway System facilities. Based on this analysis the amendment should either be revised or appropriate mitigation identified, as necessary.

#### **Sprawl**

Urban services are not currently provided to this site. The site is mostly surrounded by and contiguous to agricultural lands. Conversion of this agricultural area to low-density residential appears meet several of the indicators of urban sprawl in s. 9J-5.006(5), F.A.C.:

- a. Promotes, allows or designates for development substantial areas of the jurisdiction to develop as low-intensity, low-density, or single-use development or uses in excess of demonstrated need.
- b. Promotes, allows or designates significant amounts of urban development to occur in rural areas at substantial distances from existing urban areas while leaping over undeveloped lands which are available and suitable for development.

- c. As a result of premature or poorly planned conversion of rural land to other uses, fails adequately to 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.
- d. Fails to maximize use of existing public facilities and services.
- e. Fails to maximize use of future public facilities and services.
- f. 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.
- g. Fails to provide a clear separation between rural and urban uses.
- h. Discourages or inhibits infill development or the redevelopment of existing neighborhoods and communities.
- i. Fails to encourage an attractive and functional mix of uses.
- j. Results in the loss of significant amounts of functional open space.

In addition, the amendment has not demonstrated internal consistency with the comprehensive plan, including but not limited to the Future Land Use Element.

Florida Statutes: ss. 163.3177(2), 163.3177(6)(a), and 163.3187(2)

Florida Administrative Code: ss. 9J-5.005(2) and (5), 9J-5.006(3)(b)8, 9J-5.006(5)

State Comprehensive Plan: ss. 187.201(16), 187.201(18), F.S.

Recommendation: Do not adopt the amendment. Alternatively, provide an analysis assessing the above indicated urban sprawl indicators. Revise the amendment based on the urban sprawl analysis.

**Future Land Use Element Policy 1.02.05H/Traffic Circulation Element Policy 2.05.07  
SR 200/A1A Access Management Overlay District**

Meaningful and predictable standards for the use and development of land

The County proposes to create the SR A1A Access Management Overlay District. It would extend 1000 feet from both sides of SR A1A from the I-95 intersection to the Intracoastal Waterway and at intersections would extend from 0.5 mile to 1.0 mile radius around intersections as shown on the Future Land Use Map. The A1A Overlay District would allow the County to control access and development adjacent to SR A1A, in order to improve traffic conditions, maintain the level of service, and reduce urban sprawl.

The County's intent in proposing a SR 200/A1A Access Management Overlay District is laudable; however, as written the policy lacks definition. Therefore it is inconsistent with Rule 9J-5.005(6), F.A.C., which requires that comprehensive plan goals, objectives and policies shall establish meaningful and predictable standards for the use and development of land and provide meaningful guidelines for the content of more detailed land development and use regulations.

Florida Statutes: ss. 163.3177(6)(a), 163.3177(6)(b)

Florida Administrative Code: s. 9J-5.005(6)

State Comprehensive Plan: ss. 187.201(16), 187.201(18), 187.201(20), F.S.

Recommendation: The County should revise this policy to state more directly how the County's intent will be achieved through the application of the Access Management Overlay District. The County should consider the Florida Department of Transportation's recommendation that the County incorporate the Florida Department of Transportation's Access Management Rule (F.A.C. Rules 14-96 and 14-97) into this policy. Since permits are required for access to SR 200/A1A, the Access Management Classification System and Standards in F.A.C. Rule 14-97 and the criteria and procedures for State Highway System Connection Permits in F.A.C. Rule 14-96 should be incorporated into the Access Management Overlay District. The amendment should contain data to support the overlay district.

**Future Land Use Element Policy 1.02.05J(5)  
Regional, Municipal, and Local Activity Centers**

Meaningful and predictable standards for the use and development of land

This new policy establishes as new Future Land Use Map categories Regional, Municipal, and Local Activity Areas.

A Regional Activity Area/Center (RAC) is a proposed new land use category that will be designated and depicted on the Future Land Use Map. It is to consist of an area in proximity to a major highway intersection, where commercial, industrial, and residential growth has occurred or is very likely to occur in the next 10 years. This area shall be centered on the highway intersection and extend out about 1 mile from the intersection. Development in this area may be 30 percent more dense or intense than the County-wide adopted land use category and may include a mix of land uses as allowed in the medium- and high-density residential, commercial, and industrial land use designations when allowed at the discretion of the Planning and Zoning Board.

A Municipal Activity Area/Center (MAC) is a proposed new land use category that will be designated and depicted on the Future Land Use Map. It is to consist of the area surrounding an incorporated municipality and shall extend out about one-half mile from the municipal boundary. Development in this area may be 25 percent more dense or intense than the County-wide adopted land use category and may include a mix of land uses as allowed in the medium- and high-density residential, commercial, and industrial land use designations when allowed at the discretion of the Planning and Zoning Board.

A Local Activity Area/Center (LAC) is a proposed new land use category that will be designated and depicted on the Future Land Use Map. It is to consist of the area surrounding a minor highway intersection and extending out about one-quarter mile from the intersection. Development in this area may be 20 percent more dense or intense than the County-wide adopted land use category and may include a mix of land uses as allowed in the medium- and high-density residential, commercial, and industrial land use designations when allowed at the discretion of the Planning and Zoning Board.

The mix, allocation, densities, and intensities of land uses in these new Future Land Use Map categories is unspecified. According to Rule 9J-5.005(6), F.A.C., comprehensive plan goals, objectives, and policies shall establish meaningful and predictable standards for the use and development of land and provide meaningful guidelines for the content of more detailed land development and use regulations. Pursuant to Rule 9J-5.006(4)(c), F.A.C., policies for the implementation of mixed use categories of land use shall be included in the comprehensive plan, including the types of land uses allowed, the percentage distribution among the mix of

uses, or other objective measurement, and the density or intensity of each use. As written, the proposed policy establishing the activity centers does not comply with these Chapter 9J-5 requirements and therefore does not provide a predictable standard for the use and development of land.

The definition of the MAC appears to make it a self-amending Future Land Use Map category: as a municipality grows through annexation, the boundary of the MAC may also extend further from town. This is inconsistent with s. 163.3177(6), F.S., and Rule 9J-5.005(6), F.A.C.

Florida Statutes: s. 163.3177(6)(a)

Florida Administrative Code: s. 9J-5.005(6)

State Comprehensive Plan: ss. 187.201(16), 187.201(18), 187.201(20), F.S.

Recommendation: The County should amend this policy to provide meaningful and predictable standards for the application of the activity center land use categories. The policy should also include the types of land uses allowed, the percentage distribution among the mix of uses, or other objective measurement, and the density or intensity of each use. The MAC definition should be amended to prevent it from being self-amending.

**Future Land Use Element Policy 1.04A.02/Conservation Element Policies 6.02.01a, 6.02.03, and 6.02.03g  
Vegetative Buffer Along Wetlands and Water Bodies**

Future Land Use Policy 1.04A.02 and Conservation Policy 6.02.03 have been amended to reduce the required vegetative buffer along wetlands, named rivers, and lakes from a "50-foot parallel buffer of vegetation native to the site" to a "25-foot average [15-foot minimum] buffer of vegetation native to the site (or an approved wetland setback alternative)." As explained in proposed Conservation Element Policy 6.02.03g, the "Future Land Use Map Setback" distance for development of 25 feet averaged, 15 feet minimum, applies to lands designated Conservation I. Setbacks for wetlands designated Conservation II, which are wetlands under 2 acres in size, are not set in the comprehensive plan; setbacks from these wetlands "shall only be as required by the St. Johns River Water Management District and other state/federal agencies as appropriate."

This proposed reduction in buffer distance between development and wetlands and water bodies is not supported by adequate data and analysis demonstrating that the proposed vegetative buffer will adequately protect wetlands and the natural functions of wetlands. Furthermore, the data and analysis do not demonstrate how the comprehensive plan is directing incompatible future land uses away from the wetlands.

The added phrase, "an approved wetland setback alternative," lacks specificity and does not provide a meaningful and predictable standard for adequately protecting wetlands and their natural functions.

Because the revised wetlands buffer requirement is not supported by adequate data and analysis it is not consistent with Rule 9J-5.005(2), F.A.C. Without supporting data and analysis, these proposed policies do not comply with Rule 9J-5.013(3), F.A.C., which requires the protection and conservation of wetlands and the natural functions of wetlands. Nor are the proposed policies compatible with the State Comprehensive Plan—in particular the policies under the Natural Systems and Recreational Lands Goal.

Florida Statutes: ss. 163.3177(6)(a), 163.3177(6)(d)

Florida Administrative Code: ss. 9J-5.005(2), 9J-5.005(6), 9J-5.006(3)(c)2, 9J-5.013(1), 9J-5.013(2), 9J-5.013(3)

State Comprehensive Plan: ss. 187.201(10), 187.201(16), F.S.

Recommendation: The County should either (1) supply data and analysis to support the proposed reduction in wetlands buffer size or (2) revise these policies as necessary to comply with the wetlands protections requirements of Rule 9J-5, F.A.C. The County may wish to consider the recommendation of the St. Johns River Water Management District that the County consider amending this policy to create a hierarchy of protection for wetlands.

The County should describe the "approved wetland setback alternative" in sufficient detail to allow it to be a meaningful and predictable standard for adequately protecting wetlands and their natural functions.

### **Policy 1.05.05B**

#### **Sewer Facilities in the Coastal High Hazard Area**

##### Direct population concentrations away from known or predicted coastal high-hazard areas

This policy permits public expenditures for sewer facilities in Coastal High Hazard Areas for existing development and lots of record so as to mitigate the potentially harmful effects of septic tanks on water quality. Service to existing development and to development shown on the Future Land Use Map would not be inconsistent with Rule 9J-5.012(3)(b)6, F.A.C., and with Nassau County Coastal Management Objective 5.07 and Coastal Management Policy 5.05.06-a. However, providing service to "lots of record" is potentially inconsistent with Rule 9J-5.012(3)(b)6, F.A.C., and with Nassau County Coastal Management Objective 5.07 and Coastal Management Policy 5.05.06-a, depending on whether the lots of record have been incorporated into the Future Land Use Map.

Florida Statutes: ss. 163.3177(6)(g), 163.3178

Florida Administrative Code: s. 9J-5.012(3)(b)

State Comprehensive Plan: ss. 187.201(7), 187.201(9), 187.201(16), F.S.

Recommendation: This policy should be rewritten to state that public expenditures for sewer facilities in Coastal High Hazard Areas to serve existing development and future development allowed on the Future Land Use Map will be permitted in order to mitigate potentially harmful effects of septic tanks on water quality.

### **Objective 1.07 and policies**

#### **School Siting**

Objective 1.07 as presented in the Amendment 01-1ER package does not reflect the adopted revision of this objective in the County's recent 00-PS1 Amendment. The 01-1ER Amendment package also does not include Policies 1.07.03 through 1.07.07, which were also adopted in the 00-PS1 Amendment.

Recommendation: incorporate into the adopted comprehensive plan the adopted objective and policies in the Nassau County 00-PS1 amendment.

### **Traffic Circulation Element Policy 2.01.01**

#### **Level of Service on Intrastate and State Highway System Roads**

This policy does not clearly identify the appropriate level of service standards and service volumes for segments identified as a part of the Florida Intrastate Highway System (I-95, I-10,

US 301, and SR 200), pursuant to s. 9J-5.019(4)(c)1, F.A.C. This policy also does not provide a minimum level of service standard for functionally classified principal arterials (US 1, SR 15, US 90, and US 17).

Florida Statutes: s. 163.3180(10)

Florida Administrative Code: s. 9J-5.019(4)(c)1

State Comprehensive Plan: s. 187.201(20), F.S.

Recommendation: The County should adopt the appropriate level of service standards and service volumes for segments identified as a part of the Florida Intrastate Highway System (I-95, I-10, US 301, and SR 200), per 9J-5.019(4)(c)1, F.A.C., and should include in this policy a minimum level of service standard for functionally classified principal arterials (US 1, SR 15, US 90, and US 17).

### **Traffic Circulation Element Additional Policies Not Adopted**

The County has failed to adopt a policy that, pursuant to s. 9J-5.006(3)(c)3, F.A.C., requires that "facilities and services meet the locally established level of service standards and are available concurrent with the impacts of development." Concurrency should be referenced in this element.

The County has failed to adopt a policy that, pursuant to s. 9J-5.019(4)(c)13, F.A.C., "addresses implementation activities for the establishment of strategies to facilitate local traffic to use alternatives to the Florida Intrastate Highway System to protect its interregional and intrastate functions."

The County has failed to adopt a policy that, pursuant to s. 9J-5.019(4)(c)21, F.A.C., "protects ports, airports or related facilities from the encroachment of incompatible land uses."

The County has failed to adopt a policy that, pursuant to s. 9J-5.019(4)(b)4, F.A.C., "addresses the provisions of an efficient public transit service based upon existing and proposed major trip generators and attractors, safe and convenient public transit terminals, land use and accommodation of the special needs of the transportation disadvantaged."

Florida Statutes: s. 163.3177(10)

Florida Administrative Code: ss. 9J-5.019(4)(c)1, 9J-5.019(4)(c)21, 9J-5.019(4)(b)4

State Comprehensive Plan: s. 187.201(20), F.S.

Recommendation: The County should adopt a policy or policies that—(1) require that facilities and services meet the locally established level of service standards and are available concurrent with the impacts of development (concurrency should be referenced in this policy); (2) address implementation activities for the establishment of strategies to facilitate local traffic to use alternatives to the Florida Intrastate Highway System to protect its interregional and intrastate functions; (3) protect ports, airports or related facilities from the encroachment of incompatible land uses; (4) address the provisions of an efficient public transit service based upon existing and proposed major trip generators and attractors, safe and convenient public transit terminals, land use and accommodation of the special needs of the transportation disadvantaged.



**Public Facilities Element Policy 4.01.01/Capital Improvements Element Policy 9.02.01  
Level of Service Standards**

The County proposes to delete its level of service standards for stormwater management and substitute the following statement: "Standards shall pertain to all development and redevelopment without exception for the planning period 2000-2010 in accordance with federal and state regulations."

The proposed elimination of the stormwater management standards in the comprehensive plan is inconsistent with Rule 9J-5.005(3)(c), F.A.C., which requires that each local government shall establish level of service standards for ensuring that adequate facility capacity will be provided for future development. It is inconsistent with Rule 9J-5.011(2)(c), F.A.C., which requires that the Public Facilities Element contain policies addressing implementation activities for establishing and utilizing level of service standards provided by facilities, specifically including design storm return frequency for stormwater facilities capacity and water quality standards for stormwater discharge for all new and existing stormwater management systems. And it is inconsistent with Rule 9J-5.016(3)(c), F.A.C., which requires that the Capital Improvements Element contain policies addressing programs and activities for the establishment of level of service standards for public facilities which are within the local government's jurisdiction (these standards are to be found in the appropriate other comprehensive plan elements, in this case, the Public Facilities Element).

Florida Statutes: ss. 163.3177(3)(a), 163.3177(6)(c)

Florida Administrative Code: ss. 9J-5.005(3)(c), 9J-5.005(6), 9J-5.011(2)(c)2, 9J-5.011(2)(c)5, 9J-5.016(3)(c)

State Comprehensive Plan: ss. 187.201(8), 187.201(16), 187.201(18), F.S.

Recommendation: The County should include in the Public Facilities Element and the Capital Improvements Element policies that comply with the statutory and administrative rule requirements regarding standards for stormwater management facilities, as detailed above.

**Conservation Element Policies 6.05.03, 6.05.05, 6.05.06, 6.05.07, 6.05.10  
Endangered Species**

The County proposes to delete these policies. By so doing, the County would no longer have a policy encouraging the preservation of endangered and threatened species or their habitats, as required by Rule 9J-5.013(2)(c), F.A.C..

Florida Statutes: s. 163.3177(6)

Florida Administrative Code: s. 9J-5.013(2)(c)

State Comprehensive Plan: s. 187.201(10), F.S.

Recommendation: The County should not adopt the proposed amendment.

**C O M M E N T S**

**Future Land Use Map Series Maps 10 and 11, Traffic Circulation**

The Florida Department of Transportation recommends that the following items should be corrected:

I-95 is functionally classified as a freeway, not a principal arterial

I-10 is functionally classified as a freeway, not a principal arterial

SR 200 from US 1 to I-95 is functionally classified as a principal arterial, not a minor arterial

SR 115 should be identified as a State facility, not a county road (CR 115)

SR 107 South should be identified as a State facility, not a county road (CR 107)

#### **Future Land Use Element Policy 1.01.01**

The St. Johns River Water Management District comments: Nassau County supports maintaining and improving water quality for quality of life and economic development; by retaining this policy of no direct discharges to Class II water the County will be going a long way towards maintaining good water quality in these waters. Adding Class III waters to this policy could provide additional protection to all of Nassau County's major water bodies.

#### **Future Land Use Element Policy 1.01.07**

Reference to Policy 6.02.03k of the plan is incorrect; it should specify Policy 6.02.03g.

#### **Future Land Use Element Policy 1.01.07(c)**

The St. Johns River Water Management District comments: the County should consider retaining this policy that defines the distance at which water and wastewater are available to a site.

#### **Future Land Use Element Policy 1.02.05B**

This policy establishes residential densities for the different Future Land Use Map land use categories that allow residential development. The wording of the allowable density allowed in the different residential land use categories can cause confusion. For example, Low-Density Residential is now defined as "greater than 1 to 2 dwelling units per acre." Staff understands this to mean densities greater than 1.0 dwelling units per acre up to 2.0 dwelling units per acres; however, it could be read as a kind of banding of densities—i.e., greater than 1 or 2 dwelling units per acre. A rewording of the policy and the table at the end of the FLUE could prevent future confusion.

#### **Future Land Use Element Policy 1.02.05A**

The St. Johns River Water Management District comments that it is unclear how the two agricultural categories are defined on the Future Land Use Map. The District suggests displaying the two different types as different colors on the map.

#### **Future Land Use Element Objective 1.04.B, Historic Resources**

The Florida Division of Historic Resources comments that, their comments of 1990 in their initial review of the Nassau County comprehensive plan still apply to this element: the objective should be rewritten to be measurable.

#### **Future Land Use Element Policy 1.04B.01**

The Florida Division of Historic Resources comments: Regarding Policy 1.04B.01 with respect to an inventory of historic and archaeological resources, the county needs to check with the Florida Master Site File periodically to update their records. However, most important, there has never been a systematic comprehensive archaeological and historic survey of Nassau County to locate and evaluate its historic resources. We continue to recommend that the county sponsor a systematic archaeological and architectural and historical survey to

determine if additional significant historic resources are present. If such sites are located, they either need to be preserved and protected, or if that is not feasible, adverse impacts must be mitigated prior to allowing any land clearing or ground disturbing activities, or rehabilitation or demolition activities for structures.

#### **Future Land Use Element Policy 1.04B.02**

The Florida Division of Historic Resources comments: Policy 1.04B.02 somewhat addresses preservation and protection of known sites, but does not indicate how the county defines a significant resource.

#### **Future Land Use Element Policy 1.04B.05**

The Florida Division of Historic Resources comments: For Policy 1.04B.05, this agency can assist in determining if sites are present or the potential for archaeological and historic sites on a tract proposed for development. Regarding fortuitous finds during development activities, it is always much more cost effective to have a cultural resources assessment survey conducted prior to the initiation of any project related land clearing or ground disturbing activities.

#### **Future Land Use Element Policies 1.06.05 and 1.10.03C**

Policy 1.06.05 says Nassau County will initiate a special area study for the Yulee Planning District, whereas Policy 1.10.03C says Nassau County will initiate a sector plan for the Yulee Planning District. Page A-49 of the Data and Analysis says the sector plan is also referred to as the special area study. This equivalence should be noted in the plan amendment.

#### **Traffic Circulation Element Policy 2.01.03**

The Northeast Florida Regional Planning Council comments: as written, the policy is vague and confusing. The policy could be rewritten to state that Nassau County will encourage the Florida Department of Transportation to undertake activities that will result in I-95 operating at an acceptable LOS.

#### **Traffic Circulation Element Policy 2.05.08**

The Northeast Florida Regional Planning Council comments: this policy refers to a Florida Department of Transportation PD&E study on an unnamed roadway (assumed to be S.R. 200/A1A). The County may want to amend this policy to include reference to the roadway segment subject of this policy.

#### **Housing Element Policy 3.03.06**

This new policy is not stated in a complete sentence and thus lacks precision.

#### **Housing Element Objective 3.06**

The Florida Division of Historic Resources comments that Objective 3.06 is still vague. Policy 3.06.01 indicates that the county will conduct an historic housing survey by 2003. This is still several years away. The county should consider applying to this agency for a grant to assist in this survey as soon as possible. Furthermore, the county should also locate and evaluate its other historic structures, besides housing. Nevertheless, once these houses are located and placed on the Florida Master Site File, it is not clear what protection they will be afforded. Policy 3.06.02 states that a committee will be formed to address the protection of historic resources, but does not indicate when this committee will be initiated nor by what means

historic resources will be protected. The most effective way of protecting significant archaeological and historic resources is by the adoption of a local preservation ordinance.

### **Housing Element Objective 3.08. Housing Affordability**

The proposed objective is stated: "By 2005, the number of low-income households paying more than 30 percent of their income for housing costs will be addressed as set forth below." Staff recommends that the objective be rewritten to more forcefully state the County's intent with regard to low-income households paying more than 30 percent of their income for housing costs.

#### **Housing Element Policy 3.08.01**

The last sentence in this policy is confusing and should be reworded to more clearly state that those components of codes, ordinances, etc., which unnecessarily increase the cost of housing should be eliminated if this can be done without impairing health, sanitation, et al.

#### **Housing Element Policy 3.08.05**

This policy states that "Within 12 months of adopting its EAR-based amendments, the County shall assess its existing permit processing procedures." This policy should provide more direction: "assess its existing permit processing procedures in order to...[do what?]" The permitting procedures should be assessed in order to determine or find out something.

#### **Housing Element Policy 3.08.06**

This policy states that "The County shall strive to take the necessary steps to eliminate delays in the review of affordable housing development projects...." This policy would be more meaningful, pursuant to Rule 9J-5.005(6), F.A.C., if it were revised to state "The County shall eliminate unnecessary delays in the review of affordable housing development projects...."

#### **Housing Element--Other**

The Northeast Florida Regional Planning Council recommends that the County should cross-reference the density bonus program in the Housing Element with the density bonus provisions for Medium and High Density Residential Land Use Categories in the Future Land Use Element to explain how they work together.

#### **Public Facilities Element Objective 4.05A**

The St. Johns River Water Management District comments: the County may wish to include an additional list of uses that are prohibited within both of the wellhead protection zones. The National Association of Counties has a new publication entitle *Source Water 2000*, which includes lists of suggested prohibited uses around wellfields. In addition, the County should consider enhancing the current wellfield ordinance to expand the zone of protection to 500 feet, which matches DEP's 500-foot rule for regulated uses adjacent to wellfields.

#### **Public Facilities Element Policy 4.05.06f, Drainage Standards**

This policy states that development will conform to the drainage LOS standards established by Policy 4.01.01 and to the St. Johns River Water Management District development standards and guidelines; however, the stormwater management standards in Policy 4.01.01 have been deleted, making this reference meaningless.

### **Coastal Management Element Policy 5.01.01, Public Beach Access**

Changes the beach access standard from one beach access point per 0.5 mile to one point per 10,000 persons. This is an interim standard, pending completion of a beach access study. The old standard would require, given that Nassau County is 13 miles in length along the Atlantic, 26 access points, as a rough estimate. The new interim standard would require only 6 access points, based on an estimated 2000 population of 60,170. Currently Nassau County owns 11 access points (Data and Analysis). The Department recommends the adoption of the standard recommended in the Nassau County Data and Analysis study: 0.5 acre per 1,000 persons. This acreage-based standard is a better interim beach access standard than the one proposed in Policy 5.01.01, because the acreage standard allows for parking.

Staff notes that Recreation Element Policy 7.02.04 requires that easements for public beach access be provided by a developer of beach front property at an average of one-half mile intervals, in accordance with the Coastal Management Element.

### **Public Facilities Element Policy 5.05.06-a**

This policy states that "To maintain the maximum evacuation time, the County shall not allow an overall increase in the density of land use within the Coastal High Hazard Area (CHHA)." This policy would appear to prevent the construction of one additional dwelling unit in the CHHA, because this would cause an increase in overall density. The County may wish to consider amending this policy to say that the County shall not allow an overall increase in the density of land use within the CHHA as depicted on the Future Land Use Map.

The Northeast Florida Regional Planning Council commented that the County may wish to define "overall increase" to avoid conflicts with the new bonus density allowances and to explain how densities will be reduced throughout the Coastal High Hazard Area to accommodate requests for increased density. In this context, the Department recommends that the County may wish to clarify how the density increases allowed within the new Municipal Activity Center/Area land use category could be accommodated where a MAC overlaps the CHHA.

### **Public Facilities Element Policy 5.08.01**

Marinas and docks are not activities. The Department recommends the policy be revised to say "water-dependent and water-related facilities such as marinas and docks."

### **Public Facilities Element Objective 5.14 and related policies**

The Florida Division of Historic Resources comments: the protection of historic resources is addressed in Objective 5.14 and implementing policies. Policy 5.14.01 indicates that historic resources will be protected through the site plan review procedures. It is not clear who will be reviewing the projects and how as yet unrecorded resources are to be protected. Nevertheless, Policy 5.14.02 addresses adaptive reuse of historic structures, but does not give guidelines for rehabilitation. The county should consider using *The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings*.

### **Conservation Element Policy 6.02.01a**

The St. Johns River Water Management District commended the County on adding a policy requiring developments to use xeriscape/drought-resistant plant materials and recommended that the County specify a percentage from 25 percent to 40 percent for all new developments, which would include all landscaped areas, not just common areas.

### **Conservation Element Policies 6.03.02 to 6.03.07**

These policies, setting forth County policy on wastewater management, have been deleted. The only remaining policy, 6.03.01, simply states that new septic tank systems will continue to be inspected and approved by the County Health Department prior to issuance of a certificate of occupancy.

Regarding Policy 6.03.02, the St. Johns River Water Management District comments: the County should consider retaining the elements of this policy that deal with setbacks of septic systems adjacent to water bodies. Septic systems can be a source of pollution and a reasonable setback provides additional treatment for effluent that eventually enters surface waters. Also, the County could enhance this policy by stating a maximum density for septic tanks in environmentally sensitive areas. Of course, an exemption would be required for vested lots.

### **Conservation Element Policy 6.05.01**

This policy has been revised. The existing policy states that the County "should acquire...environmentally sensitive land." The proposed policy says only that the County shall consider the recommendations of its greenway committee to acquire environmentally sensitive land. The amended policy is virtually meaningless.

The Department recommends that the acquisition of environmentally sensitive land be tied to accomplishment of the goals and objectives of the comprehensive plan: for example, "The County shall acquire environmentally sensitive land as needed to accomplish the goals and objectives of this comprehensive plan."

### **Conservation Element Policy 6.05.04**

The St. Johns River Water Management District comments: the County may wish to reconsider the elimination of this policy that limits discharges and marinas and instead more narrowly define places or areas where these limits are to take place. As was discussed previously, it is apparent that the County places a premium on its streams and estuaries and therefore it would seem appropriate to maintain policies that help protect these unique features.

### **Capital Improvements Element Policy 9.02.01**

The Florida Department of Transportation comments: the County should adopt the appropriate level of service standards and service volumes for segments identified as a part of the Florida Intrastate Highway System (I-95, I-10, US 90, and US 17), pursuant to s. 9J-5.019(4)(c)1, F.A.C. This policy should provide a minimum level of service standard for functionally classified Principal Arterials (US 1, SR 15, US 90, and US 17).

### **Data and Analysis Report**

The Florida Division of Historic Resources comments, regarding the Data And Analysis Section: the information listed on page A-33 and page C-6 regarding historic structures should be periodically reviewed and updated with the Florida Master Site File, as shown in Table C-1. Regarding the Intergovernmental Coordination Element, page H-5, this agency is known as the Florida Department of State, Division of Historic Resources, as indicated on page H-10. The Division of Archives, History, and Records Management has been defunct since the mid-1980s.