



Women for Wise Growth

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April 17, 2008

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RE: Women for Wise Growth Recommended Major Issues for the 2009 Evaluation and Appraisal Report (EAR)

Dear Ben,

Last Thursday we discussed the benefit of the document Women for Wise Growth developed specifically for the EAR process. This 11 page manuscript delineates weaknesses of the Comprehensive Plan that we and other transportation, energy, health, and land use experts believe should be addressed as we navigate the EAR. Following intense review, it has been approved by the membership of Women for Wise Growth.

In addition to identifying issues and subissues, we have included specific recommendations where they apply. Below, I have listed the areas of concern expounded upon in the document. The primary corresponding contributors of ideas for each section are also itemized for each issue.

1. Affordable Housing—The Shimberg Center for Affordable Housing
2. Energy—Adrienne Burges Senior Utility Analyst/Managing Partner of Commercial Utility Econometrics, LLC (secondary contributions made by Dr. Ruth Steiner of the Department of Urban & Regional Planning UF and Gladys Lane former President of Women for Wise Growth)
3. Transportation—Cindy Smith of the Coalition for Responsible Growth and Dr. Ruth Steiner
4. Public Health—Jeff Feller from WellFlorida Council
5. Land Use—Kathy Cantwell of Sierra Club, Ellen Huntley Dube CTF Farmlands Program Director, and Gladys Lane former President of Women for Wise Growth
6. Environmental Lands Conservation—same as #5

7. Rural Lands—same as #5
8. Stormwater and Potable Water—Carol Higman of EPAC

Although not mentioned in the draft (as it is a more “general issue”), we also recommend that Alachua County should explore the possibility of requiring a maximum number of amendments per period or quarter to the comprehensive plan in order to preserve the integrity of the plan and encourage well-directed development. We hope that this issue can also be addressed during the EAR in some fashion.

If you need further information please do not hesitate to contact me by phone, (904) 318-5803, or e-mail, Kendra.sm@gmail.com. Please CC Kathryn Turner, the coordinating author of this document, on all email correspondences to me. Her email is zutner@ufl.edu. She is a University of Florida graduate student interning with Women for Wise Growth under the supervision of Dr. Ruth Steiner for UF credit.

We look forward to this important process, and are more than happy to help in any way you see fit.

Thank you,

Kendra I. Siler-Marsiglio, Ph.D.
President, Women for Wise Growth

RE: Women for Wise Growth Recommended Major Issues for the 2008 Evaluation and Appraisal Report (EAR)

SECTION 1

1.1 Affordable Housing

The following is a specific list of areas that need to be evaluated and/or amended in the Alachua County Comprehensive Plan in order to improve upon the current plan for affordable housing, to aid in the maintenance and preservation of existing units, and to estimate future projections for County-wide housing needs.

SUMMARY OF MAJOR ISSUES REGARDING AFFORDABLE HOUSING:

1. The recommendations below illustrate the need for an updated Housing Study based on the newest available data to identify the current need for affordable housing, the current inventory of affordable housing, including manufactured homes, and the locations and projected needs for future affordable housing. The County should set measures for the Housing Study and make the findings available to the public.
2. The County should explore incentives for developers who conform to Green Building Certification standards as specified by the Florida Green Building Coalition or to LEED standards as specified by the U.S. Green Building Council. The County should assess the short- and long-term costs and benefits of requiring all newly constructed affordable housing units to meet LEED and/or Green Building standards, specifically keeping in mind the goals of promoting environmental and financial sustainability.
3. Under Goal 3 of the Housing Element the County should amend the language to reflect the special housing needs of single-parent families, nontraditional households, and single-income households. The County should aim to provide housing opportunities located in proximity to essential services such as affordable childcare and active recreation sites. The County should also recognize the need to prohibit housing discrimination

against sexual minorities, including transgendered individuals and those with non-heterosexual orientations.

1.2 Specific Recommendations

HOUSING ELEMENT

OBJECTIVE 1.1

- A. Update Policy 1.1.3 to reflect the newest data available on housing inventory and current needs with respect to Elements 1-6.
- B. Amend Policy 1.1.4 to require that new developments have a minimum number of affordable housing units on site, not off site.
- C. Evaluate Policy 1.1.6 to find whether the Affordable Housing Element has been successful in addressing housing needs identified in the Housing Study specified in 1.1.3.
- D. Update Policy 1.1.8 to reflect a new timeline for revising the list of County-owned parcels based on the newest available data.
- E. Update Policies 1.1.11 to 1.1.15 to include a measure requiring data collection on existing manufactured/mobile home stock in order to determine whether current manufactured housing qualifies as affordable housing. The County should work toward preserving the current number of affordable housing units offered by manufactured housing by providing the means to construct affordable housing units when the number of affordable housing units decreases as a result of a decline in manufactured housing stock.

OBJECTIVE 1.2

- A. Evaluate Policy 1.2.2 to determine whether the development incentives listed in A-G have affected the development of affordable housing.
- B. Update Policy 1.2.3 to determine a specific measure and timeline for reviewing land development policies.
- C. Update Policy 1.2.4 to determine a specific measure and timeline for reviewing and evaluating zoning and other regulations.
- D. Update Policy 1.2.5 with regard to the measure requiring an update of appropriate building technologies.

OBJECTIVE 1.4

- A. Revise Policy 1.4.1 to emphasize the need for the rehabilitation of current affordable housing stock as a main priority over new construction.
- B. Update Policy 1.4.3 to reflect a new timeline for identifying additional funding sources.
- C. Update Policy 1.4.8 to reflect a new timeline for evaluating the need for local assistance in funding affordable housing.

OBJECTIVE 2.1

- A. Evaluate Policy 2.1.2 with regard to the public planning process in areas with substandard housing.

OBJECTIVE 2.2

- A. Evaluate Policy 2.2.2 to explore incentives for builders who conform to LEED and/or Green Building Standards.
- B. Revise Policy 2.2.3 to express the goal that all newly constructed affordable housing units should conform to Green Building Standards and/or LEED Standards.
- C. Evaluate Policy 2.2.5 to determine the effectiveness of the County's efforts to promote sustainable building techniques.

OBJECTIVE 2.4

- A. Evaluate Policy 2.4.3 to determine whether minimum housing standards, especially for manufactured housing, places an undue financial burden on residents. The County should evaluate the impact of regulatory measures on affordable housing stock.
- B. Evaluate Policy 2.4.5 to determine how much and what kind of assistance the County has provided to households displaced by public programs.

OBJECTIVE 3.1

- A. Revise Policy 3.1.1 to include the prohibition of housing discrimination against sexual minorities, including transgendered individuals and individuals with non-heterosexual orientations.
- B. Revise Policy 3.1.3 to include priority housing for children aging out of the foster care system.

- C. Evaluate Policy 3.1.6 to determine the effectiveness of funding through the SHIP program to agencies working with the homeless.

SECTION 2

2.1 Proposed: Public Health Element

Below is a list of major issues regarding public health that should be addressed in the Alachua County Comprehensive Plan through the inclusion of a Public Health Element that emphasizes the importance of coordinating public health systems, improving service delivery, adopting innovative planning strategies to encourage outdoor physical activity, and public awareness about community and personal health issues.

SUMMARY OF MAJOR ISSUES REGARDING PUBLIC HEALTH:

Florida does not require a formal Public Health Element in county comprehensive plans. However, an optional health element can elucidate many of issues that overlap with public health and land use, as well as provide a basis for smart growth planning that aims to reduce disease, enhance service delivery through proper planning, and encourage public awareness about health issues. Florida Statute 163.3177 paragraph (7) section (k) identifies other optional elements as “such other elements as may be peculiar to, and necessary for, the area concerned and as are added to the comprehensive plan by the governing body upon the recommendation of the local planning agency.” We believe a Public Health Element is necessary and appropriate for Alachua County.

2.2 Specific Recommendations

A. Alachua County should explore the possibility of an optional Health Element that encourages the following: coordination of service delivery and systems of care; incorporation of urban design goals to improve the walkability/rideability (bicycle) within Alachua County; appropriate levels of service in terms of land availability and service/program availability for country recreational opportunities (both active and passive...perhaps exploring recreational concurrency); incorporation of design goals that foster overall physical fitness; and incorporation of design goals that allow for seniors to “age in place” within their communities.

SECTION 3

3.1 Energy Conservation

Below is a list of major issues regarding energy that should be addressed in the Alachua County Comprehensive Plan through Conservation Element that emphasizes the importance of water conservation, reducing greenhouse gas emissions, and energy reduction and conservation through sustainable building practices.

SUMMARY OF MAJOR ISSUES REGARDING ENERGY CONSERVATION:

Because energy conservation is essential for maintaining and improving the quality of life in Alachua County, it is necessary that the County addresses energy and water resource allocation in order to ensure that the County can keep up with the demand for public utilities. The County should set targets for reducing emissions and gradually move toward requiring, or at minimum incentivizing, environmentally-friendly design standards for new development.

3.2 Specific Recommendations

- A. Incorporate energy and water conservation into the Goals, Principles, and Strategies of the Future Land Use Element.
- B. Principle 1 of the Future Land Use Element should be amended to include energy and water resource allocation.
- C. General Strategy 1 of the Future Land Use Element should be amended to include aggressive energy and water efficiency standards in all new development.
- D. Add Objective 1.7 to the Future Land Use Element to specifically to promote advanced urban and architectural design to promote efficient energy use in residential and commercial development. This objective should include the following:
 - 1. Requirements and/or incentives for LEEDS or Green Building Certification for new commercial building construction.
 - 2. Requirements and/or incentives for stricter construction quality and insulation standards and a means of enforcing these standards.
 - 3. Requirements and/or incentives for passive energy design standards, including building orientation, glazing orientation, and shading.
 - 4. Strategies and property tax incentives for “Net Zero” home construction.
 - 5. Requirements and/or incentives for on-site renewable energy standards for new development.
- E. The County should also develop strategies and incentives to increase renewable energy sources that offset and reduce fossil fuel consumption.
- F. The County should establish standards for evaluating and monitoring the energy requirements of new development to ensure that developers are adhering to requirements to conserve energy.
- G. The County should establish aggressive local greenhouse gas reduction goals in built environment and transportation.
- H. The County should require the installation of drought-resistant landscaping in all new development.

- I. The County should develop a study of desirable landscaping and tree species for conservation for new development and recommend removal of exotic species through incentives and/or requirements.
- J. The County should require new development to adhere to Florida Water Star Standards as specified by the St. Johns River Water Management District.

SECTION 4

4.1 Transportation Issues

Below is a list of major issues related to transportation that should be addressed in the Alachua County Comprehensive Plan through urban design and land use strategies that minimize vehicle trips and promote multimodal transportation and greener alternatives.

SUMMARY OF MAJOR ISSUES REGARDING TRANSPORTATION:

1. Alachua County should reorient its approach to transportation by focusing on green, energy saving strategies that comply with the Florida Climate Change and Energy Policy Action Team recommendations of November 1st, 2007. An abbreviated list of their recommendations is outlined below.
2. The County should adopt the use of Vehicle Miles Traveled (VMT) instead of “trips” for evaluating transportation impacts. Using VMT rather than trips allows for a more realistic estimation of the traffic impacts generated by proposed development. Similarly, the County should examine the Transportation Concurrency Exception Area (TCEA) as outlined in the plan, to determine whether it has encouraged or discouraged infill development.
3. The County should require all new development to be compact, utilizing traditional neighborhood design.
4. The County should clarify the future traffic corridors amendment, taking into consideration concerns for the “greenbelt,” Alachua County Visioning and existing conservation, strategic ecosystems, springs preservation, groundwater protection, and planning for East Gainesville.

4.2 Specific Recommendations

- A. Alachua County should comply with the following Florida Climate Change and Energy Policy Action Team issued recommendations on November 1st, 2007 with regard to the following:
 1. Strategies and mechanisms for the consolidation and coordination of energy policy in Florida;

2. Additional greenhouse reduction strategies beyond those directed in Executive Order 07-127, as well as an overall blueprint for development of actions;
3. Policies to enhance energy efficiency and conservation;
4. Market-based regulatory mechanisms, such as cap and trade programs, for use in efficiently reducing greenhouse gas emissions;
5. Strategies to diversify electric generation fuels to reduce greenhouse gas emissions;
6. Policies for emission reporting and registry that measure and document emissions reductions;
7. Strategies for reducing greenhouse gas emissions from motor vehicles;
8. Strategies for increasing the amount of renewable transportation fuels and for reducing the carbon content of fuels, such as a low carbon fuel standard;
9. Policies to reduce greenhouse gas emissions from state and local governments not addressed in Executive Order 07-126
10. Policies to reward early emissions reductions in advance of statewide or national greenhouse gas regulatory programs,
11. Other policies for efficiently reducing emissions in Florida with, or independent of regional, national, or international agreements.

SECTION 5

5.1 Land Use Issues

SUMMARY OF MAJOR ISSUES:

1. The biggest problem facing Alachua County is urban sprawl. The urban service line extends too far beyond the urban area and housing densities are too low within the urban service area. The “by right” or default density of 1 du/5 acres in the unincorporated area is a problem. We should look at old plats that have never been built out yet remain enclaves of dense lots in the middle of nowhere. The County should give a date that these s/d should sunset or lose their vested development rights.
2. Any increase in density outside of the Urban Service Line should be directly linked to a requirement that those rights be purchased from an already delineated Sending Area. We would be requiring the purchase of open space in order to allow development. There should be an area or areas designated in the comprehensive plan where these transfers of

development rights could lawfully occur without having to go through a comprehensive plan amendment.

3. In order to promote higher density growth near the Urban Service Line, the current density of 4 units per acre should be raised to 8 units or more per acre to accommodate a Transit Oriented Development, New Urbanist-style development, traditional neighborhood design, LEED, and compact mixed use development. A possible “low density fee” should also be considered.

SECTION 6

6.1 Environmental Lands Conservation

SUMMARY OF MAJOR ISSUES:

1. As the money for purchasing conservation lands is dwindling, alternatives for putting lands in permanent protection must diversify. One way is a Transfer of Development Rights program, which should be strengthened and heavily benefit those involved. The County should allow more development rights only when they agree to transfer them (that is, if the development ability is 1 dwelling unit/5 acres, it should increase to 2 dwelling units ONLY if they transfer them). Any development increase outside the Urban Service Line should be REQUIRED to purchase the development rights. There should be a grey area outside the USL where this could occur without having to go through a Comp plan amendment.
2. Alachua County should be ready to implement a conservation lands tax exemption class for lands with conservation value and easements on them so that when the state allows it, which it appears they may do with this legislative session, we are ready. Similarly, as a part of the County’s effort to seek funding sources for purchasing conservation lands, the County should encourage “less than fee acquisition” for putting land in conservation in perpetuity. The County should enact an impact fee ordinance for the purchase of conservation land, the proceed to be used for the explicit purpose of purchasing lands through Alachua County Forever.
3. Alachua County should perform an evaluation of how much open space is needed for water recharge, biodiversity, carbon sequestration, and how much agricultural land is needed to continue keep agriculture economically viable and make those findings available to the public.

SECTION 7

7.1 Rural Lands

SUMMARY OF MAJOR ISSUES:

1. Alachua County should create an Agriculture/Rural Lands Element, or alternatively include an agriculture/rural lands subsection into Economic Development Element. Set a goal for the number of acres or percent of County generated private revenue that needs to

be generated by Agriculture operations and their support industries to remain viable and grow. Also, the County should take into consideration the

2. Planning for rural agricultural and forest lands should include a county-wide component that provides a generalized understanding of the amount of land in public conservation and the amount and uses of privately owned lands. The private lands analysis should include the number and sizes of properties, percentage used for cropland, woodland, forest production and pasture, market value of production, major products, acres enrolled in land preservation incentive programs and technical assistance cost share programs, and the economic and fiscal impacts of the agricultural and forestry industry on the community. In addition a more spatial, area specific analysis is required to gain an understanding of the soils, climate and culture that have resulted in the successful forest industry and agribusinesses in Alachua County.

SECTION 8

8.1 Stormwater and Potable Water Issues

SUMMARY OF MAJOR ISSUES:

1. The County should adopt the Total Maximum Daily Load (TMDL) system as outlined in the Orange Creek and Suwannee B-MAP Plans. The TMDL system is designed to uphold water quality standards and control the amount of nutrients released into local waters. By supporting such programs, Alachua County will be taking progressive steps to reverse the damage that has been done as a result of development, as well as preserve our water supply for future generations.
2. The County should explore improvements for on-site water treatment options for all new developments in order to reduce the nutrient runoff into surrounding recharge areas. One such area is Paynes Prairie. Special consideration should be given to the areas surrounding Paynes Prairie, including requiring more stringent regulations for on-site water treatment and retrofits. Actions the County should take include improving stormwater retrofits, centralized wastewater infrastructure management, septic system repair or upgrade, pollution prevention, and the County should undertake an extensive public education campaign.
3. The County should require that in order for new development to occur, reclaimed water hookups should be in place before the development is proposed.
4. The County needs to address the negative impacts of fertilizers and excessive irrigation on our water supply through a comprehensive study that addresses residential and commercial fertilizer and pesticide usage. The County should set goals to raise awareness about excessive fertilizer usage and inform homebuilders of alternatives such as drought-resistant plants, exotic removal, and limited turf coverage. The County should also create a public education campaign about Florida Water Star standards.

8.2 Specific Recommendations

A. Although the State of Florida is currently considering a state-wide rule for reducing nutrient runoff for all new development (to be adopted in 2009), Alachua County should take proactive steps and go beyond meeting the minimum criteria for stormwater treatment. Best Management Practices (BMPs) that can be required or incentivized for all new development are listed below. Southwest Florida is currently considering the adoption of the SWFL Basin Rule, which will implement a system in which developers will be required to “earn” a certain amount of points based on the selection of BMPs from a menu of options. Alachua County might also consider some of the following features for stormwater treatment (the full basin rule can be found at <http://my.sfwmd.gov/>):

1. Reduced turf coverage
2. Native landscape plantings
3. Stormwater recycling
4. Rooftop runoff
5. Cisterns
6. Pervious pavement
7. Retention/detention side slope buffers
8. Filter strips/vegetated stormwater inlets or vegetated swales
9. Sediment trap structures
10. Dry detention/detention pre-treatment
11. Extended hydraulic residence time
12. Creation of on-site wetlands for treatment
13. Planted Filter Marsh
14. Increased Flow Path
15. Chemical treatment