

PROPOSED SMALL-SCALE FUTURE LAND USE MAP (FLUM) AMENDMENT

OVERVIEW

APPLICANT: JOHN MORAN

PROPERTY LOCATION: 1357 LACLEDE AVENUE

Acreage: 0.84

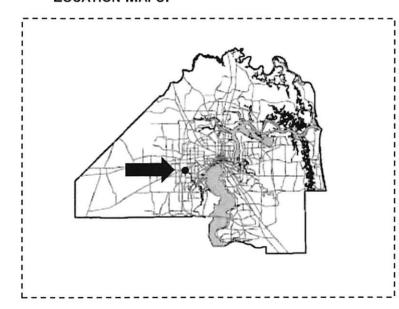
Requested Action:

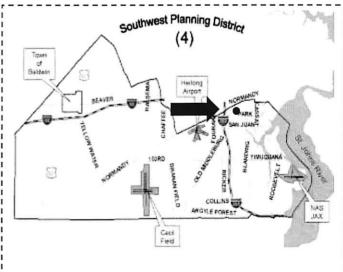
	Current	Proposed
LAND USE	LDR	MDR
ZONING	RLD-60	RMD-D

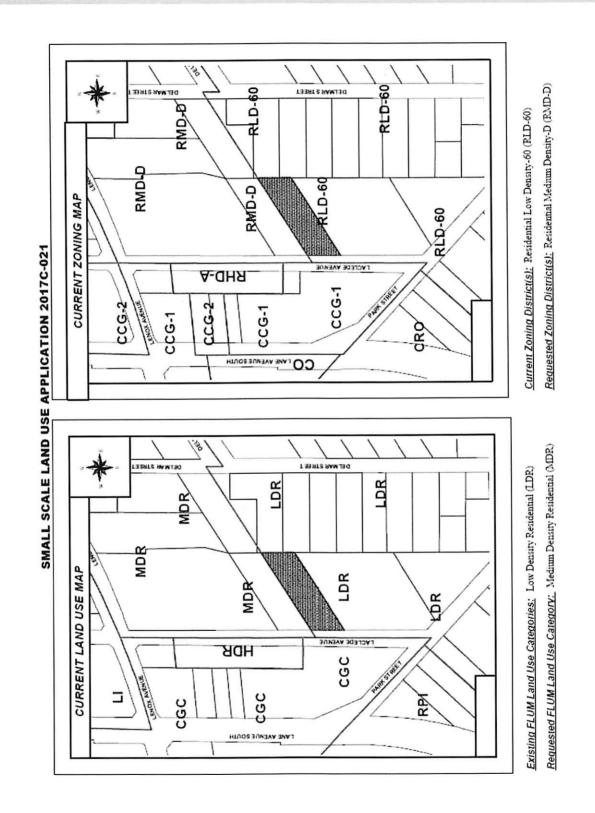
Existin FLUN Catego	FLUM	Existing Maximum Density (DU/Acre)	Proposed Maximum Density (DU/Acre)	Existing Maximum Intensity (FAR)	Proposed Maximum Intensity (FAR)	Net Increase or Decrease in Maximum Density	Non- Residential Net Increase or Decrease in Potential Floor Area
LDR	MDR	4 DU (5 DU/Acre)	13 DU (15 DU/ Acre)	N/A	N/A	Increase of 9 DU	N/A

PLANNING AND DEVELOPMENT DEPARTMENT'S RECOMMENDATION: APPROVAL

LOCATION MAPS:







ANALYSIS

Background:

The 0.84 acre subject property is located along the eastern side of Laclede Avenue, a two lane local roadway, and is within the Urban Development Area. The subject site, located between Park Street and Lenox Avenue, is the southern portion of a larger parcel that has both Low Density Residential (LDR) and Medium Density Residential (MDR) land use. The subject site currently contains a garage that is detached from a home located on the northern portion of the parcel, which is already designated as Medium Density Residential.

The applicant proposes a future land use amendment from Low Density Residential (LDR) to Medium Density Residential (MDR) and a rezoning from Residential Low Density-60 (RLD-60) to Residential Medium Density-D (RMD-D). The proposed change would allow for consistency of the land use and zoning between the northern and southern halves of the parcel. The companion rezoning is pending concurrently with this land use amendment application pursuant to Ordinance 2017-629.

The dominant land use in this area is residential, however there are some commercial sites located nearby, along Lenox Avenue and Lane Avenue. Detailed information about the surrounding area can be found on Page 2, Dual Map, and Page 11, Attachment A – Land Utilization Map.

The adjacent uses and zoning are as follows:

Adjacent Property	Land Use	Zoning District	Current Use(s)
North	MDR, LI	RMD-D,CO,	Apartments, Auto Repair , Gas
		IBP, IL	Station, Retail
South	LDR	RLD-60	Single Family, Vacant
East	LDR,MDR	RLD-60, PUD	Single Family
West	CGC,RPI,	CCG-1, RMD-	Apartments, Retail, Auto Repair,
	HDR,	A, CCG-2, CO	Church

Impact Assessment:

Potential impacts of a proposed land use map amendment have been analyzed by comparing the Development Impact Standards for the subject site's existing vs. proposed land use categories unless maximum density/intensity is noted on the Annotated FLUM or is in a site specific policy. Development Impact Standards are detailed in FLUE Policy 1.2.16, Development Standards for Impact Assessment. These standards produce development potentials as shown in this Section.

Utility Capacity

The calculations to determine the water and sewer flows contained in this report and/or this spreadsheet have been established by the City of Jacksonville Planning and Development Department and have been adopted by JEA solely for the purpose of preparing this report and/or this spreadsheet. The method of calculating water and sewer flows in order to

properly size infrastructure shall continue to be based on JEA's Water, Sewer and Reuse for New Development Projects document (latest edition).

Infrastructure Element

Sanitary Sewer Sub-Element

Policy 1.1.1 JEA shall provide for regional wastewater facilities associated with development within the Urban Area as defined in the Future Land Use and Capital Improvements Element, excluding improvements within the service area of an investor-owned public utility company of regional status.

Transportation

The Planning and Development Department completed a transportation analysis (see Attachment B) and determined that the proposed amendment has the potential to result in an increase of 48 new daily external trips. This analysis is based upon the comparison of what potentially could be built on that site (as detailed in FLUE Policy 1.2.16 Development Standards for Impact Assessment) versus the maximum development potential. Trips generated by the new development will be processed through the Concurrency and Mobility Management System Office.

Transportation Element

Policy 1.2.1 The City shall use the Institute of Transportation Engineers *Trip Generation Manual*, latest edition, to determine the number of trips to be produced or attracted to a particular land use when assessing a traffic impact.

Capital Improvements Element

Policy 1.6.1 Upon adoption of the Mobility Plan implementing ordinance, the City shall cease transportation concurrency and use a quantitative formula for purposes of assessing a landowner's mobility fee for transportation impacts generated from a proposed development, where the landowner's mobility fee shall equal the cost per vehicle miles traveled (A); multiplied by the average vehicle miles traveled per Development Area (B); multiplied by the daily trips (C); subtracted by any trip reduction adjustments assessed to the development.

Supplemental Transportation Information

The 2030 Mobility Plan replaced the transportation concurrency management system to address the multi-modal mobility needs of the city. Mobility needs vary throughout the city and in order to quantify these needs the city was divided into 10 Mobility Zones. The Mobility Plan identifies specific transportation strategies and improvements to address traffic congestion and mobility needs for each mode of transportation. The project site is located in Mobility Zone 7 on Laclede Avenue between Lenox Avenue and Park Street.

Existing available roadway capacity for the vehicle/truck mode for the entire zone was tested based on volume demand to capacity ratio (V/C), where the average daily traffic volumes determined from the most recent City of Jacksonville traffic count data were compared to the

Maximum Service Volumes (MSV) from the current FDOT Quality/Level of Service Handbook (2012) for each functionally classified roadway within the zone. A V/C ratio of 1.0 indicates the roadway network is operating at its capacity.

The result of the V/C ratio analysis for the overall Mobility Zone 7 is **0.66**.

Laclede Avenue is a local roadway that would be impacted by the proposed development. Lenox Avenue and Park Street are functional classified facilities and the proposed 13 multifamily dwelling units could generate approximately 48 net new daily trips unto the network. These roadways are expected to operate at an acceptable capacity ratio with the inclusion of the additional traffic from this land use amendment.

Archaeological Sensitivity

According to the Duval County Archaeological Predictive Model, the subject property is located within an area of high sensitivity for the presence of archaeological resources. Projects that move forward through the Site Review process may be required to perform a Professional Archaeological Reconnaissance Survey. If archaeological resources are found during future development/redevelopment of the site, Section 654.122 of the Code of Subdivision Regulations should be followed.

Historic Preservation Element

Policy 1.2.6 The Planning and Development Department shall maintain and update for planning and permitting purposes, a U.S.G.S. series of topographic maps upon which recorded archaeological sites are shown.

Airport Environment Zone

The site is located within the 300 foot Height and Hazard Zone for the Herlong Recreational International Airport. Zoning will limit development to a maximum height of less than 300', unless approved by the Jacksonville Aviation Authority or the Federal Aviation Administration. Uses located within the Height and Hazard Zone must not create or increase the potential for such hazards as electronic interference, light glare, bird strike hazards or other potential hazards to safe navigation of aircraft as required by Section 656.10051(d).

Future Land Use Element

Objective 2.5 Support and strengthen the role of Jacksonville Aviation Authority (JAA) and the United States Military in the local community, and recognize the unique requirements of the City's other airports (civilian and military) by requiring that all adjacent development be compatible with aviation-related activities

School Capacity

The 0.84 acre proposed land use map amendment has a maximum potential development of 13 dwelling units. The proposed development was analyzed in accordance with the adopted level of service standards (LOS) for school capacity as established in the Interlocal Agreement (ILA) and the Public Schools and Facilities Element. The ILA was entered into in

coordination with the Duval County Public School System (DCPS) and the other municipalities within Duval County.

School concurrency LOS is the methodology used to analyze and to determine whether there is adequate school capacity for each school type (elementary, middle, and high school) to accommodate a proposed development. The LOS (105% of permanent capacity) is based on Concurrency Service Areas (CSAs), not the closest school in the area for elementary, middle and high schools, as well as on other standards set forth in the City of Jacksonville School Concurrency Ordinance.

In evaluating the proposed residential development for school concurrency, the following results were documented:

School Impact Analysis LUA 2017C-021

Development Potential: 13 Multi-Family Units

School Type	CSA	2016-17 Enrollment/CSA	Current Utilization (%)	New Student/ Development	5-Year Utilization (%)	Available Seats
Elementary	2	6,575	81%	2	76%	1,853
Middle	2	2,463	65%	1	82%	670
High	2	3,371	84%	1	88%	796
•	al New Idents			4		

Total Student Generation Yield: 0.333

Elementary: 0.167 Middle: 0.073 High: 0.093

The analysis of the proposed residential development does not reveal any deficiency for school capacity within the CSA.

Public School Facilities Element

Policy 2.3.2 The City will coordinate with DCPS to establish plan review procedures to manage the timing of Future Land Use Map amendments and other land use decisions so that these decisions coordinate with adequate school capacity.

Policy 2.3.3 The City will take into consideration the DCPS comments and findings on the availability of adequate school capacity in the evaluation of comprehensive plan amendments, and other land use decisions as provided in Section 163.3177(6)(a), F.S. and development of regional impacts as provided in 1380.06, F.S

Objective 3.2 Adopted Level of Service (LOS) Standards

Through the implementation of its concurrency management systems and in coordination with the DCPS, the City shall ensure that the capacity of schools is sufficient to support new residential developments at the adopted level of service (LOS) standards within the period covered in the five-year schedule of capital improvements and the long range planning period. These standards shall be consistent with the Interlocal Agreement agreed upon by the DCPS, the City and the other municipalities. Minor deviations to the LOS standards may occur, so long as they are limited, temporary and with scheduled capacity improvements, school capacity is maximized to the greatest extent feasible.

Policy 3.1.1 The LOS standards set forth herein shall be applied consistently for the purpose of implementing school concurrency, including determining whether sufficient school capacity exists to accommodate a particular development application, and determining the financial feasibility of DCPS Five-Year Capital Facilities Plan and the City's Capital Improvement Plan.

Supplemental School Information:

The following additional information regarding the capacity of the assigned neighborhood schools was provided by the Duval County School Board. This is not based on criteria utilized by the City of Jacksonville School Concurrency Ordinance.

SCHOOL	CSA	STUDENTS GENERATED BY LAND USE	SCHOOL CAPACITY	CURRENT ENROLLMENT (2017/18)	% OCCUPIED	4 YEAR PROJECTION
Hyde Grove #214 (K-2)	2	1	690	515	75%	68%
Hyde Park #77 (3-5)	2	1	551	336	61%	76%
Lake Shore MS #244	2	1	1328	1213	91%	95%
Robert E Lee HS #265	2	1	1844	1913	104%	95%

TOTAL STUDENTS

4

^{*}The percentage occupied may not appear correct due to ESE space requirements

IMPACT ASSESSMENT

	CURRENT	PROPOSED			
Site Utilization	Detached Garage	Medium Density Residential			
Land Use/Zoning	LDR/RLD-60	MDR/RMD-D			
Development Standards					
For Impact Assessment	5 DU/Acre	15 DU/Acre			
Development Potential	4 S.F. Homes	13 M.F. Homes			
Population Potential	10 people	30 people			
SPE	CIAL DESIGNATIONS AR	EAS			
(HIB) C. CHARLET MARKET AND A COLUMN AND A C	YES	NO			
Aquatic Preserve		X			
Airport Environ Zone	300' Herlong				
Industrial Preservation Area		X			
Cultural Resources		Х			
Archaeological Sensitivity	X- Hìgh				
Historic District		X			
Coastal High Hazard Area		Χ			
Ground Water Aquifer Recharge Area		X			
Well Head Protection Zone		X			
	PUBLIC FACILITIES				
Potential Roadway Impact	48 net new daily trips				
Water Provider	JEA				
Potential Water Impact	Increase 1991 gallons per day				
Sewer Provider	JEA				
Potential Sewer Impact	Increase 1493.3 gallons per	day			
Potential Solid Waste Impact	Increase 141.33 tons per ye				
Drainage Basin / Sub-Basin	Cedar River				
Recreation and Parks	John D Liverman Park				
Mass Transit	0.20 miles from Rt. 13				
on the state of th	NATURAL FEATURES	and the second of the second o			
Elevations	15'				
Soils	38- Mascotte fine sand 0 to				
	2- Albany fine sand, 0 to 5 p				
Land Cover	1300- Residential, high dens				
<u> </u>	4340- Upland mixed conifer	ous hardwood			
Flood Zone	No				
Wet Lands Wild Life	No No				

PROCEDURAL COMPLIANCE

Upon site inspection by the Planning and Development Department on September 18, 2017, the required notices of public hearing signs were posted. Twenty (20) notices were mailed out to adjoining property owners informing them of the proposed land use change and pertinent public hearing and meeting dates.

The Citizen's Information Meeting was held on September 18, 2017. The applicant and one neighbor living near the proposed amendment site were present. The neighbor was concerned about the site not presently being connected to centralized water and sewer.

Another neighbor, who currently resides out of the country, has also expressed concern about the property, citing lack of demand in the area for dense residential developments among other concerns in an opposition letter (Attachment E).

CONSISTENCY EVALUATION

2030 Comprehensive Plan

Proposed amendment analysis in relation to the Goal, Objectives, and Policies of the 2030 Comprehensive Plan:

Future Land Use Element

- Policy 1.1.10 Gradual transition of densities and intensities between land uses in conformance with the provisions of this element shall be achieved
- through zoning and development review process.
- Policy 1.2.9 Require new development and redevelopment in the Central Business District, Urban Priority Area, Urban Area, and Suburban Area to be served by centralized wastewater collection and potable water distribution systems when centralized service is available to the site. New septic tanks in this area maybe permitted only as interim facilities pursuant to the requirements of the Sanitary Sewer Sub-Element.
- Objective 3.1 Continue to maintain adequate land designated for residential uses which can accommodate the projected population and provide safe, decent, sanitary and affordable housing opportunities for the citizens. Protect single-family residential neighborhoods by requiring that any other land uses within single-family areas meet all applicable requirements described in the Development Areas and the Plan Category Descriptions of the Operative Provisions of the 2030 Comprehensive Plan and Land Development Regulations.
- Policy 3.1.3 Protect neighborhoods from potential negative impacts by providing a gradation of uses and scale transition. The Land Development

Regulations shall be amended to provide for an administrative process to review and grant, when appropriate, relief from the scale transition requirements.

Policy 3.1.6

The City shall provide for development of a wide variety of housing types by area, consistent with the housing needs characteristics and socioeconomic profiles of the City's households as described in the Housing Element.

Policy 4.1.8B

The City shall evaluate all proposed amendments to the Comprehensive Plan as to their compliance with the area's vision plan and any existing neighborhood plans and studies. Priority shall be given to those amendments with the greatest potential to further the goals and objectives of the vision plans and neighborhood plans and studies.

Currently the site has a Low Density Residential (LDR) land use designation. According to the Future Land Use Element (FLUE), LDR in the urban area is intended to provide for low density residential development. Further, it is intended to promote neighborhoods in need of redevelopment and to provide a compact single-family development typology that is supportive of transit, neighborhood commercial uses, and services.

The site is proposed to change from LDR to Medium Density Residential (MDR). According to the FLUE, MDR in the urban area is intended to provide compact medium density residential development. Plan amendment requests for new MDR designations are preferred in areas which are supplied with full urban services and in locations which transition between commercial and residential land uses.

The site is not currently served by centralized water and wastewater. However, the applicant has provided a JEA availability letter for the property, dated August 25, 2017, stating that the site has access to sewer and water connection points, both of which are located at the corner of Lenox Avenue and Laclede Avenue. Development of the site will require connection to JEA sewer and water services pursuant to FLUE Policy 1.2.9.

The proposed amendment to MDR is a logical extension of the adjacent MDR land use category and will maintain an appropriate transition from the High Density Residential parcel located across the street to the west and the LDR properties abutting the southern and eastern boundaries of the subject site. The proposed amendment allows for a variety of housing types to serve a diverse set of housing needs, therefore the application is consistent with FLUE Objective 3.1, as well as Policies 1.1.10, 3.1.3, and 3.1.6.

The proposed amendment has been evaluated for consistency with The Southwest Jacksonville Vision Plan, consistent with FLUE Policy 4.1.8B.

Vision Plan

The subject property is located within the boundaries of the Southwest Jacksonville Vision Plan. The vision plan states that quality housing is a main concern of residents in this area.

The proposed development would be consistent with the first goal of the vision plan, which is to strengthen existing neighborhoods and create new neighborhoods. The proposed development would be adding new housing to an existing neighborhood, therefore strengthening the surrounding residential area.

Strategic Regional Policy Plan

The proposed amendment is consistent with the following Goal of the Strategic Regional Policy Plan:

Policy 3: Local governments are encouraged to offer incentives or make development easier in areas appropriate for infill and redevelopment.

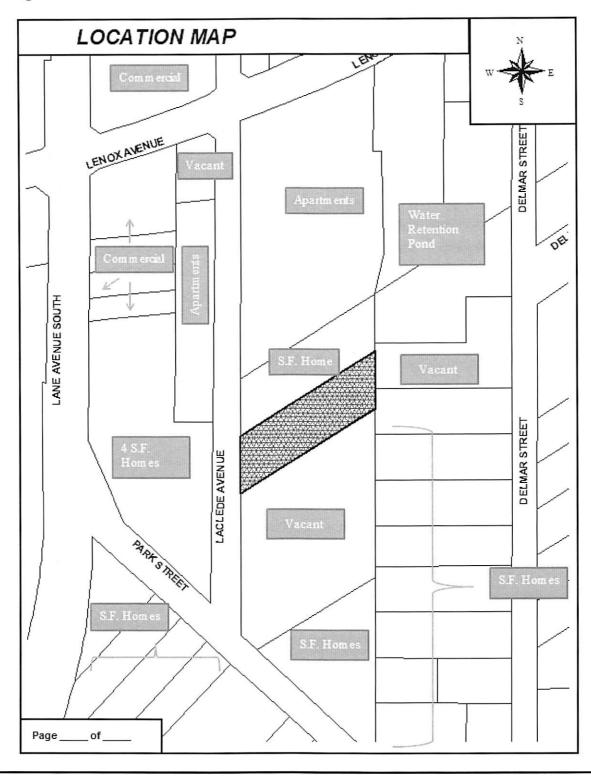
The proposed land use amendment is consistent with Policy 3 of the Northeast Florida Regional Council's Strategic Regional Policy Plan as it would provide an additional location for the creation of residential areas to support the proposed new business opportunities in the northeast Florida region.

RECOMMENDATION

The Planning and Development Department recommends **APPROVAL** of this application based on its consistency with the 2030 Comprehensive Plan and the Strategic Regional Plan.

ATTACHMENT A

Existing Land Utilization:



ATTACHMENT B

Traffic Analysis:

A trip generation analysis was conducted for Land Use Amendment 2017C-021, located at 1357 Laclede Avenue between Lenox Avenue and Park Street in the Urban Development Area of Jacksonville, Florida. The subject site is currently occupied with one single-family home and has an existing Low Density Residential (LDR) land use category. The proposed land use amendment is to allow for Multi-family Density Residential (MDR) land uses on approximately 1.68 +/- acres.

Transportation Element Policy 1.2.1 of the 2030 Comprehensive Plan requires the use of the most current ITE Trip Generation Manual (9th Edition) to calculate the vehicular trips based on the maximum development potential for existing and proposed land uses. In accordance with development standards for impact assessments established in the Future Land Use Element Policy 1.2.16, LDR land use category development impact assessment standards allows for 5 single-family dwelling units per acre, resulting in a development potential of 4 homes (ITE Land Use Code 210) which could generate 38 net daily trips. The proposed the MDR land use category allows for 15 multifamily dwelling units per acre resulting in a development potential 13 DUs (ITE Land Use Code 220), generating 86 new daily vehicular trips. This will result in 48 net new daily vehicular trips if the land use is amended from LDR to MDR, as shown in Table A.

Table A

Trip Generation Estimation

Trip Gener	ulion 23	CITICALIO II				
Current Land Use	ITE Land Use Code	Potential Number of Units (X)	Estimation Method (Rate or Equation)	Gross Trips	Less Pass-By Trips	Net New Daily Trip Ends
<u>LDR</u>	210	4 Dus	T=9.52 (X)	38	0.00%	38
			_		Total Section 1	38
Proposed Land Use	ITE Land Use Code	Potential Number of Units (X)	Estimation Method (Rate or Equation)	Gross Trips PM/Daily	Less Pass-By Trips	Net New Daily Trip Ends
MDR	220	13 MF Dus	T = 6.65 (X)	86	0.00%	86
	Total Section 2					
	Net New Daily Trips					

Source: Trip Generation Manual, 9th Edition, Institute of Engineers

ATTACHMENT B (cont)

Additional Information:

The 2030 Mobility Plan replaced the transportation concurrency management system to address the multi-modal mobility needs of the city. Mobility needs vary throughout the city and in order to quantify these needs the city was divided into 10 Mobility Zones. The Mobility Plan identifies specific transportation strategies and improvements to address traffic congestion and mobility needs for each mode of transportation. The project site is located in Mobility Zone 7 on Laclede Avenue between Lenox Avenue and Park Street.

Existing available roadway capacity for the vehicle/truck mode for the entire zone was tested based on volume demand to capacity ratio (V/C), where the average daily traffic volumes determined from the most recent City of Jacksonville traffic count data were compared to the *Maximum Service Volumes* (MSV) from the current FDOT Quality/Level of Service Handbook (2012) for each functionally classified roadway within the zone. A V/C ratio of 1.0 indicates the roadway network is operating at its capacity.

The result of the V/C ratio analysis for the overall Mobility Zone 7 is **0.66**.

Laclede Avenue is a local roadway that would be impacted by the proposed development. Lenox Avenue and Park Street are functional classified facilities and the proposed 13 multi-family dwelling units could generate approximately 48 net new daily trips unto the network. These roadways are expected to operate at an acceptable capacity ratio with the inclusion of the additional traffic from this land use amendment.

ATTACHMENT C

Land Use Amendment Application:



APPLICATION FOR SMALL-SCALE LAND USE AMENDMENT TO THE FUTURE LAND USE MAP SERIES - 2030 COMPREHENSIVE PLAN

8/10/17 9/29/17 Date Submitted: Date Staff Report is Available to Public: Land Use Adoption Ordinance #: 2017-628 Planning Commission's LPA Public Hearing: 10/5/17 2017-629 1st City Council Public Hearing: 10/10/17 Rezoning Ordinance #: 2017C-021 JPDD Application #: LUZ Committee's Public Hearing: 10/17/17 Assigned Planner: 2nd City Council Public Hearing: 10/24/17 Krista Fogarty

GENERAL INFORMATION ON APPLICANT & OWNER

Applicant Information: JOHN MORAN

13464 ELLSWORTH LANE JACKSONVILLE, FL 32225 Ph: 9047551607

Email: JSM@JACKSONPROPERTIES.US

Owner Information: MICHEAL MORAN JKN PROPERTIES LLC P O BOX 330 178

ATLANTIC BEACH, FL 32233 Ph: 9047551607

DESCRIPTION OF PROPERTY

Acreage: (

0.84

Real Estate #(s): 011738 0000, a portion of

General Location:

LAKESHORE, BETWEEN PARK STREET AND LENOX AVENUE

MDR

Planning District: Council District:

Development Area: URBAN AREA
Between Streets/Major Features:

LENOX and PARK

Address:

1357 LACLEDE AVE

LAND USE AMENDMENT REQUEST INFORMATION

Current Utilization of Property: VACANT

Current Land Use Category/Categories and Acreage:

LDR 0.84

Requested Land Use Category: MDR

Surrounding Land Use Categories:

Justification for Land Use Amendment:

TWO HAVE SAME ZONING ON BOTH THE NORTH AND SOUTH HALVES OF THE PROPERTY.

UTILITIES

Potable Water: JEA

Sanitary Sewer JEA

COMPANION REZONING REQUEST INFORMATION

Current Zoning District(s) and Acreage:

RLD-60 0.84

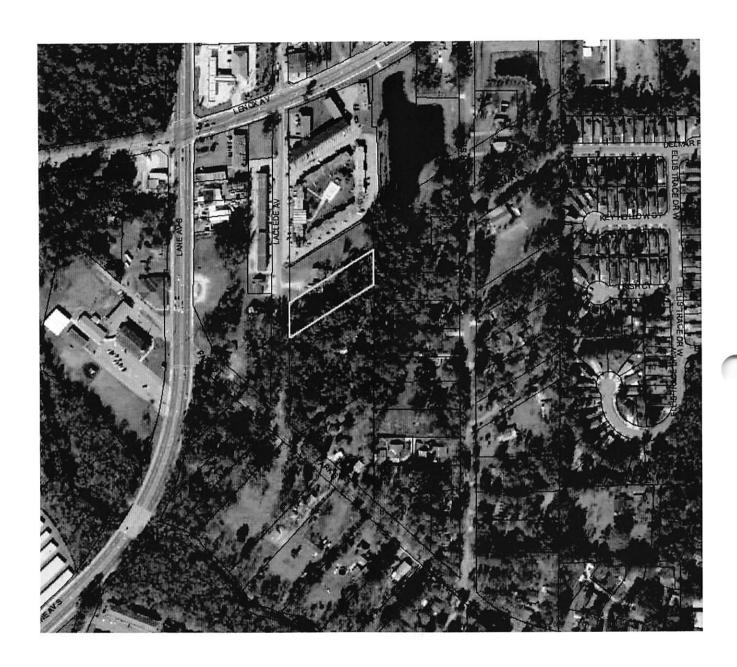
Requested Zoning District: RN

RMD-D

Additional information is available at 904-255-7888 or on the web at http://maps.coj.net/luzap/

ATTACHMENT D

Aerial:



ATTACHMENT E

OPPOSITION: Land Use Application Number: 2017C-021

Planning and Development Department

Opposed to Application for new Development

Aurora Fotino
Owner of Mirabella Development Ltd
Operating as Paloma's Apartments
5930 Lenox Ave, Jacksonville, FL 32205

Please note that my response to this application is late, due to I live in Canada and did not receive your notification in time —though the mail posting stamp read Sep. 6 2017. I didn't receive it until Sep.20,2017

I will be attending the Public Hearing on October 10, 2017 and if possible I will be there for the October 5th meeting.

- We have Invested \$2,250,000 to purchase this property and invest in excess of \$750,000 in improvements; not to mention ongoing maintenance, our ground are wonderful and our units are very well kept, our building are kept clean and fresh painted – we make sure that our property stay in absolutely good condition.
- In our property they have never been much crime, but after we bought it. We
 have installed 12 high resolution cameras with a large monitor in the office. We
 do not have any crime of any kind in the community or rental /renters' our property
 is well known for that.
- We take pride to it and we very much care for our tenants we done this to insure even a better protection and a much more comfortable living and an extra care and security for our tenants
- 4. Check with the police station ,read about us in the rental magazine --rating rental apartments, our vacancy is not due because the property is not kept well -- or it is not in a good condition- or that it is not run properly, simply there is not enough population[Not enough new population moving in the area
- The population is not there and we are already exsacerated with rental building for the area. Simply too many rentals units for the area and not enough people moving in to the area to fill all the vacancy.
- 6. Though I am an out of the country investor, I spent 2 full year working in our building site and I now spent 3-5 month each year, so I am fully aware and fully informed on the rental market for the area and all around situation.
- 7. Different if we were in the surrounding area of the beach area

ATTACHMENT E (cont)

- 8. I like to bring to your attention that we Own this property for the past 5 years and in all those years it has only been occupied up to 70% to 75% we have never reached the 95% occupancy
- 9. Even though with constant advertising, in excess of \$1500 per month we are not able to increase occupancy
- 10. This shows that the market could not withstand another rental property it is currently saturated MARKET and according to our market research not expected to have any significant increase, in the area if any at all, if we cannot keep our rental occupancy up to 90 to 95% how can the area sustain more rental units, it is clear that cannot and it is not fusible for all parties involved.
- 11. The new proposed rezoning would allow an approx 32 new rental unit, this would very much jeopardize the business of existing rental properties in the area and also, the new property itself would have a high possibility of not been supported by sufficient renters
- 12. We have been in contact with other property managers in the area, they are also having difficulty to keep and maintain tenants up to 90 to 95% occupancy- good tenants.
- 13. There is no need for further rental property development in the area at list not for now, possible in 5-10 year if the population increase in the area, and the demands for new unite availabilities would be evident., but as it stand now it is clear that it is not the case
- 14. There is a minimal migration in the area, if any
- 15. A new rental building in the area would be Detrimental to the ongoing business of apartment rentals
- 16. We employ numerous contractors and have full time employees whose jobs would be put into jeopardy should any new development in the rental residential market be approved for a new building, as our vacancy will increase tremendously, especial been in such close proximity.
- 17. We have 106 unite therefore our contribution to the area population is way more significant than the additional 32 possible unite.
- 18. Should this application be approved our vacancy would increase immensely (see numbers 3 to 6) and we would have no choice other than having to let go of our long term staff
- 19. As a property owner, we have been paying our property taxes for local infrastructure support the local economy for the last 5 and going on the 6th year, provide good paying jobs to at least 12 contractors and 5 full time workers, plus the management company on an going time table we hope to be supported by the local government, and to understand our concern and why we truly, and strongly Object to this application.

ATTACHMENT E (cont)

20. We are in the process of organizing a Petition to support this opposition to this application - will be presenting it at the October 10, 2017 Public Hearing

Thank you for your attention to this matter

Best regards

Aurora Fotino - Owner of Mirabella development.

Operation as Paloma's apartments

Aurora Fotino Cell: 1-<u>604 -817 7606</u> Home # 1-604- 291-8901 Jacksonville office 904-781-3493

Email aurorafotino@gmail.com