



City of Alachua

Planning & Community Development Department Staff Report

Planning & Zoning Board Hearing Date: February 12, 2019
Legislative Hearing

SUBJECT: A Staff-initiated amendment to the City's Land Development Regulations (LDRs) regarding Certificates of Appropriateness

APPLICANT/AGENT: City of Alachua

PROJECT PLANNERS: Kathy Winburn, AICP; Justin Tabor, AICP; Adam Hall, AICP

RECOMMENDATION: Staff recommends that the Planning & Zoning Board find the proposed Text Amendments to the City's Land Development Regulations to be consistent with the City of Alachua Comprehensive Plan and in compliance with the City's Land Development Regulations and transmit such finding to the City Commission with a recommendation to approve.

RECOMMENDED MOTION: *Based upon the presentation to this Board and Staff's recommendation, this Board finds the proposed text amendments to the City's Land Development Regulations to be consistent with the City of Alachua Comprehensive Plan and in compliance with the City's Land Development Regulations and transmits such finding to the City Commission with a recommendation to approve.*

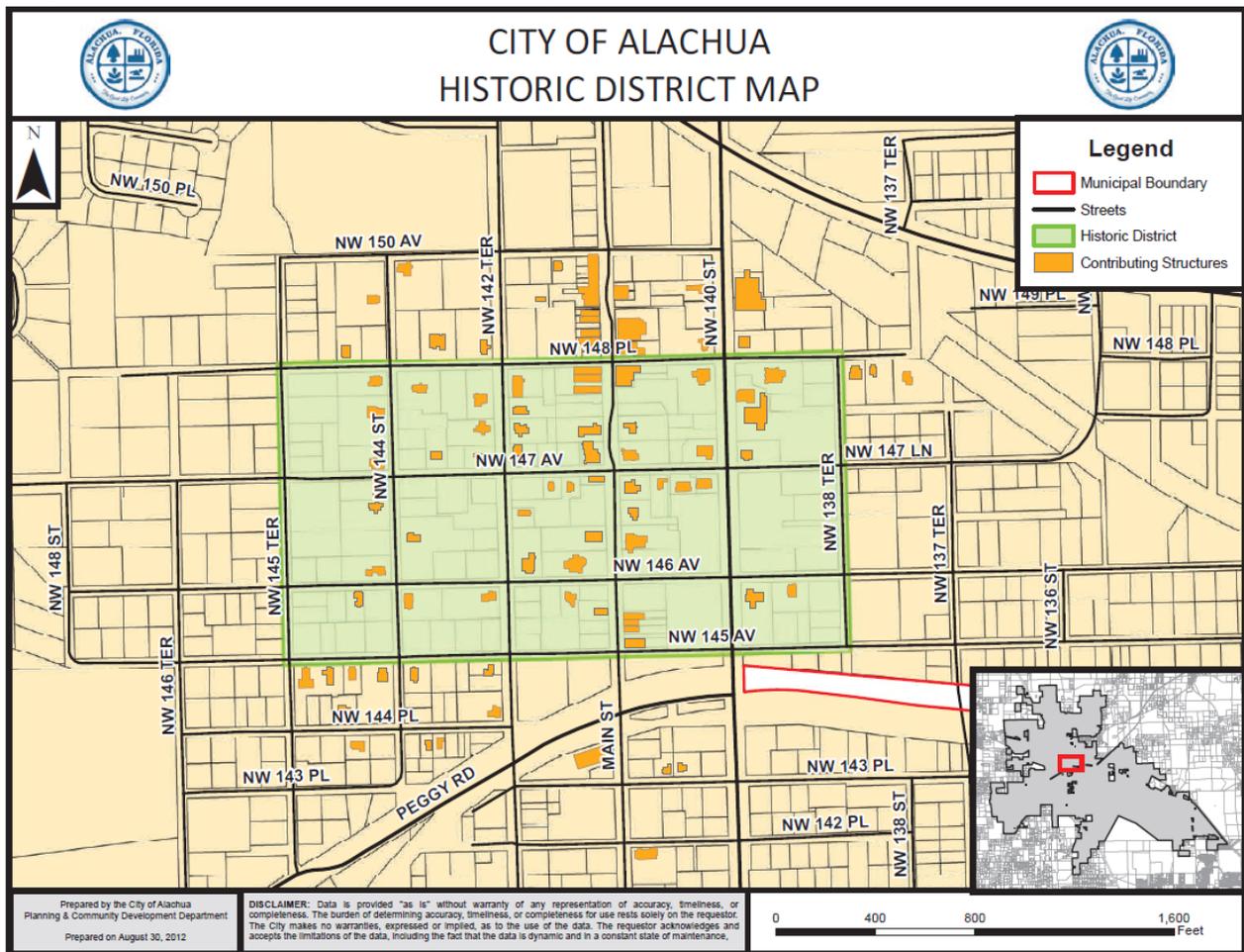
SUMMARY

Section 3.7.2(A) of the City’s Land Development Regulations (LDRs) establishes the Historic Overlay District (the “District”). Section 3.7.2(A)(1) states that the purpose of this district are to recognize the City’s historic and architectural resources, which are assets that are important to the City’s health, safety, and economic, educational, cultural, and general welfare. Among the stated purposes within this section, the District is intended to:

- ❖ Protect the beauty of the City and improve the quality of its environment through identification, recognition, conservation, maintenance and enhancement of its historic and architectural resources;
- ❖ Protect designated land and buildings or structures having historic and architectural significance from the intrusion of development that fails to protect such significance;
- ❖ Stabilize and improve property values in such districts, strengthening the local economy;
- ❖ Foster civic pride; and,
- ❖ Encourage redevelopment of the City's downtown.

The District is comprised of all lots in an area bounded by Northwest 145th Avenue, Northwest 145th Terrace, Northwest 148th Place, and 138th Terrace (see Map 1 below).

Map 1. City of Alachua Historic Overlay District



Section 3.7.2(A)(5) requires any demolition, new construction, addition, or alteration of exterior architectural features which occurs within the District to obtain a Certificate of Appropriateness prior to any such action. The procedures for the review of a Certificate of Appropriateness and the standards of review are set forth in Section 2.4.6. Under the current regulations, all Certificates of Appropriateness must be reviewed and issued by the Planning & Zoning Board (PZB).

In the process of implementing the current regulations which pertain to the District and Certificates of Appropriateness, Staff has found that amendments could be made to establish a more efficient review process for certain minor projects or those which are proposed on residential properties. Currently, limited changes to building facades, even when occurring as part of ordinary maintenance and repair, and additions to residential uses not readily visible from public areas, such as streets, require the issuance of a Certificate of Appropriateness by the PZB. In order to create a more efficient and streamlined review process, Staff proposes to amend Section 2.4.6 and other related sections of the LDRs.

In summary, the proposed amendments would:

- ❖ Create a new administrative review process for residential maintenance and repairs projects which would presently require approval of a COA by the Planning & Zoning Board;
- ❖ Exempt from the Certificate of Appropriateness review process residential additions, alterations, or demolitions when the addition, alteration, or demolition is not visible from a street (except for structures listed on National Register of Historic Places or Contributing to COA Downtown Historic District);
- ❖ Exempt from the Certificate of Appropriateness review process minor material changes to a building façade when the change is associated with ordinary repair and maintenance;
- ❖ Reduce duplicative reviews of projects which have received a Business Façade Improvement Grant from the City's Community Redevelopment Agency (CRA), while also reducing the amount of time required to obtain permits for such grant-funded projects; and,
- ❖ Make minor revisions to the existing regulations to clarify the purpose and intent of existing standards of review.

Each proposed amendment is identified in the following section of this report. Below each amendment, a brief staff comment is provided to describe the purpose of the amendment.

PROPOSED LDR TEXT AMENDMENTS

AMENDING SECTION 2.1.1(B) AND TABLE 2.1-1 RELATING TO THE DEVELOPMENT REVIEW STRUCTURE

2.1.1 *Summary of administration and review roles.*

- (B) *Development review structure.* Table 2.1-1, Development Review Structure, summarizes the review bodies and City staff that have specific permit review roles under these LDRs, and their responsibilities.

Table 2.1-1: Development Review Structure					
S = Staff Review C = Plan Consistency Review R = Review and Advise D = Final Decision A = Appeal					
Development Permit	LDR Administrator	Board of Adjustment (BOA)	Planning and Zoning Board (PZB)	City Commission	Hearing Officer
Historic Sites and Structures					
Historic Overlay District Classification (Section 2.4.5)	S		C/R	D	
<u>Certificate of Appropriateness (Minor Review) (Section 2.4.6)</u>	<u>D</u>	<u>A</u>			
Certificate of Appropriateness (<u>Major Review</u>) (Section 2.4.6)	C/S		D	A	

Staff Comment: This amendment would create a new section within Table 2.1-1 to identify the review structure, decision making authority, and appeals process for Certificates of Appropriateness requiring minor review (i.e., review by the LDR Administrator). Table 2.1-1 would also be amended to distinguish Certificates of Appropriateness requiring major review (i.e., review by the Planning & Zoning Board).

AMENDING SECTION 2.1.3(C) RELATING TO THE POWERS AND DUTIES OF THE PLANNING & ZONING BOARD

2.1.3 Planning and Zoning Board (PZB).

- (C) *Powers and duties.* The PZB is authorized by the City Commission with the following powers and duties under these LDRs:
- (2) *Certificate of appropriateness.* To review and decide applications for certificates of appropriateness (major review) (Section 2.4.6).

Staff Comment: The amendment to Section 2.1.3(C) would identify that Certificates of Appropriateness requiring major review are reviewed and decided by the Planning & Zoning Board.

AMENDING SECTION 2.1.6(A)(2) RELATING TO THE POWERS AND DUTIES OF THE LDR ADMINISTRATOR

2.1.6 City staff.

- (A) *Land Development Regulation (LDR) Administrator.*
- (1) *Generally.* The LDR Administrator is the City Manager or designee, and shall be the City official responsible for administering the provisions of these LDRs.
- (2) *Powers and duties.* In addition to the jurisdiction, authority and duties that may be conferred upon the LDR Administrator by other provisions of the City Code and general or special law, the LDR Administrator shall have the following jurisdiction, powers and duties under these LDRs:
- (a) To supervise, review and decide applications for:
- (i) Certificates of appropriateness (minor review) (Section 2.4.6).

- ~~(i)(ii)~~ Administrative adjustments (Section 2.4.8).
- ~~(ii)(iii)~~ Minor site plans (Section 2.4.9(J)).
- ~~(iii)(iv)~~ Major subdivision construction plans (Section 2.4.10(G)).
- ~~(iv)(v)~~ Sign permits (Section 2.4.11).
- ~~(v)(vi)~~ Temporary use permits (Section 2.4.12).
- ~~(vi)(vii)~~ Special event permits (Section 2.4.13).
- ~~(vii)(viii)~~ Certificates of concurrency compliance (Section 2.4.14).
- ~~(viii)(ix)~~ Certificates of LDR compliance (Section 2.4.15).
- ~~(ix)(x)~~ Tree removal permits (Section 2.4.17).
- ~~(x)(xi)~~ Mobile home move-on permits (Section 2.4.18).

Staff Comment: The amendment to Section 2.1.6(A)(2) would establish the authority of the LDR Administrator to review and decide applications for Certificates of Appropriateness requiring minor review.

AMENDING SECTION 2.4.6 RELATING TO CERTIFICATES OF APPROPRIATENESS

2.4.6 Certificate of appropriateness.

- (A) *Purpose.* The purpose of this subsection is to provide a mechanism for reviewing demolition, removal, relocation, new construction, additions, or alterations of exterior features on development within the Historic Overlay ~~(HO)~~-Districts to ensure they comply with the standards of this section ~~and approved design standards.~~

Staff Comment: The amendment to Section 2.4.6(A) would clarify existing regulations.

- (B) *Authority.* The PZB is authorized to review and decide applications for a certificates of appropriateness, provided however that the LDR Administrator is authorized to review and decide applications for certificates of appropriateness as set forth in Subsection 2.4.6(E)(3), Certificate of appropriateness (minor review), of this section.

Staff Comment: The amendment to Section 2.4.6(B) would establish the authority of the PZB and the LDR Administrator to render decisions for Certificates of Appropriateness based upon the type of review (i.e., major or minor review).

- (C) *Applicability.*

- (1) *When required.* A certificate of appropriateness shall be required prior to any demolition, removal, relocation, new construction, additions, or alterations of exterior features in the Historic Overlay ~~(HO)~~-District, unless the activity is exempted in accordance with Subsection 2.4.6(D), Exemptions, of this section.

- ~~(2) *Certificate of appropriateness not required.* Nothing in this section shall be construed to prevent the ordinary maintenance or repair of any exterior architectural feature of structures designated as historic when the repair does not involve a change in design, material, color, or outer appearance of the structure. Certificates of appropriateness are not required for alterations to the interior of a building or alterations to the use of a building, unless the interior of a particular structure is specifically identified in the designation ordinance establishing a Historic Overlay (HO) District (Subsection 2.4.5 of this section, Historic Overlay (HO) District classification, and Section 3.7.2(A), Historic Overlay Districts).~~

Staff Comment: The amendment to Section 2.4.6(C)(1) would clarify existing regulations and provide for internal consistency with other proposed amendments (the creation of a new Section 2.4.6(D), *Exemptions*). The provisions of Section 2.4.6(C)(2) would be relocated to new Section 2.4.6(D).

- (D) *Exemptions.* The following activity shall be exempted from the requirements of this section (but is not exempted from other permits as may be applicable for the proposed activity, which may include but are not limited to a site plan, minor site plan, and/or building permit):

(1) Repairs and maintenance with limited changes. Ordinary maintenance or repair of any exterior architectural feature of buildings or structures that does not involve a change in design, material, color, or outer appearance of the building or structure; provided however that ordinary maintenance and repairs may change the material or color of a building façade when such repair or maintenance does not exceed five percent (5%) of the area of the façade.

(2) Interior alterations. Alterations to the interior of a building or structure, or alterations to the use of a building or structure, unless the interior of a particular building or structure is listed on the National Register of Historic Places.

(3) Activity conducted under the CRA Business Façade Grant Program. Activity which is being performed as part of the scope of work of a project reviewed and approved under the City's Community Redevelopment Agency (CRA) Business Façade Grant Program.

(4) Residential additions, alterations, or demolitions not visible from street. The demolition, removal, new construction, addition, or alteration of exterior features on existing residential buildings or residential structures, or any buildings or structures which are accessory to a residential use, when the building or structure is not visible from a street and when the building or structure is used exclusively for residential purposes. This exemption shall not apply to any building or structure listed on the National Register of Historic Places or to any buildings or structures listed as a contributing building to the City of Alachua Downtown Historic District.

Staff Comment: New Section 2.4.6(D) would create three (3) new exemptions from the Certificate of Appropriateness review process:

- ❖ Minor changes to the material or color used on a building facade when the change occurs as part of ordinary repair and maintenance;
- ❖ Activity being performed as part of the scope of work for projects reviewed and approved under the Community Redevelopment Agency (CRA) Business Façade Grant Program; and,
- ❖ Demolition, removal, new construction, additions, and alterations of existing residential building and structures when not visible from a street (provided however, that the exemption would not apply to any building or structure listed on the National Register of Historic Places or to any buildings or structures listed as a contributing building to the City of Alachua Downtown Historic District).

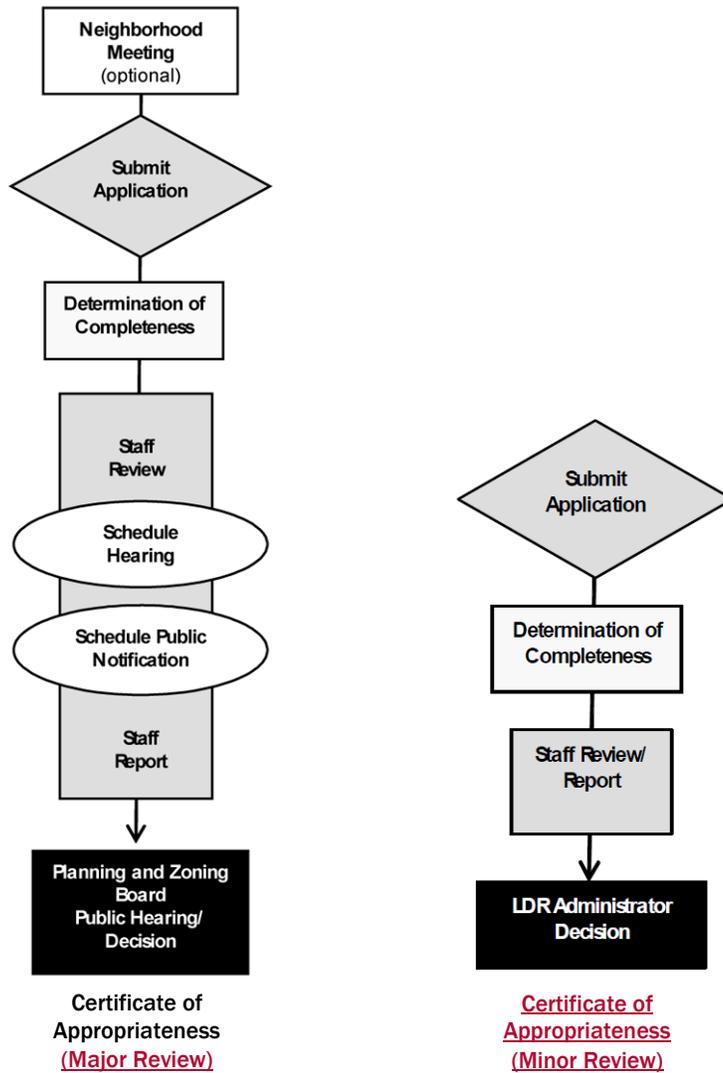
These exemptions are proposed to address ordinary repair/ maintenance projects with limited changes to building facades, residential projects not readily visible from a street, and to reduce duplicative reviews of improvements within the Historic Overlay District which may occur for projects receiving grant funding from the CRA. Staff has taken into consideration public comment received over several years in reference to current requirements to obtain a Certificate of Appropriateness for projects addressed by these proposed exemptions.

~~(D)~~(E) *Procedure.*

- (1) *Application submission, review, public notification, and scheduling hearing.* The procedures and requirements for submission and review of an application are established in Section 2.2, Common development review procedures.
- (2) *Review and action by PZB.* After-Except as provided in Subsection 2.4.6(E)(3), Certificate of appropriateness (minor review), of this section, after preparation of a staff report, public notification, and the scheduling of a public hearing, the PZB shall conduct a public hearing on the application in accordance with Section 2.3.2, Standard public hearings. At the public hearing, the PZB shall consider the application, the relevant support materials, the staff report, and the testimony given at the public hearing. After the close of the public hearing,

the PZB shall approve, approve with conditions, or deny the application based on the standards in Subsection 2.4.6(~~E~~F) of this section, Certificate of appropriateness standards.

Staff Comment: The amendment to Section 2.4.6(E)(2) would address the new minor review process.



- (3) Certificate of appropriateness (minor review). The LDR Administrator is authorized to review and approve, approve with conditions, or deny an application for a certificate of appropriateness for projects which propose the type(s) of activity set forth in Subsections 2.4.6(E)(3)(a) and (b). The LDR Administrator shall review and take action on the application in accordance with the procedures and requirements of Section 2.2.13, *Review by LDR Administrator*. The LDR Administrator, in his or her sole discretion, may refer any application for a certificate of appropriateness to the PZB when the LDR Administrator finds that the application does not comply with the certificate of appropriateness standards as set forth in Subsection 2.4.6(F), *Certificate of appropriateness standards*. The LDR Administrator may establish a Certificate of Appropriateness Approval Matrix identifying specific types of activity that may be reviewed in accordance with this subsection, consistent with the following:
- (a) Residential repairs and maintenance with changes. Activity that is considered to be ordinary repair and maintenance of a residential building or structure involving a change in design, material, color, or outer appearance of the building or structure (including but not limited to: changes in roofing materials and/or changes in roofing

material colors; window types; shutter types; doors; decks and porches; or other similar appurtenances); and,

- (b) Residential additions, alterations, or demolitions visible from street. The demolition, removal, new construction, addition, or alteration of exterior features on existing residential buildings or residential structures, or any buildings or structures which are accessory to a residential use, when the building or structure is visible from a street and when the building or structure is used exclusively for residential purposes. Buildings or structures listed on the National Register of Historic Places shall require PZB action.

Staff Comment: New Section 2.4.6(E)(3) would establish the review procedure for minor reviews of Certificates of Appropriateness as well as the projects which are eligible for minor review. In addition, new Section 2.4.6(E)(3) would permit the LDR Administrator to establish a Certificate of Appropriateness Approval Matrix which identifies specific types of projects eligible for minor review, consistent with this subsection. The Matrix is intended to serve as a user-friendly guide to assist the public in determining the type of review applicable for any project being considered within the Historic Overlay District. A draft of the Matrix is provided below.

~~(E)~~(F) *Certificate of appropriateness standards.* The following standards shall be applied in determining whether to approve, approve with conditions, or deny a certificate of appropriateness:

- (1) *Affect exterior appearance.* Whether the proposed action will affect the exterior appearance of ~~the subject land or a building or~~ structure and if such action will be visible from a street, or if such action will affect the appearance of any interior portion ~~specifically identified in any relevant designation ordinance of a building or structure listed on the National Register of Historic Places or a building or structure listed as a contributing building to the City of Alachua Downtown Historic District.~~
- (2) *Affect consistent with historical, architectural or other relevant qualities.* Whether any such affect is consistent with the historical, architectural, or other qualities which the Historic Overlay District~~relevant designation ordinance~~ seeks to protect and ~~enforce~~preserve.
- (3) *Negative or positive impact on neighboring ~~lands-properties~~ of historical significance.* Whether the proposed action will have a negative or positive impact on neighboring ~~lands properties~~ that have historic significance.
- (4) *Effect of denial.* Whether the denial of a certificate of appropriateness would deprive the owner of reasonable beneficial use of their ~~landproperty~~.
- (5) *Demolition.* In cases where a certificate of appropriateness is proposed for demolition of all or a portion of a historic property, the applicant shall demonstrate:
 - (a) That no other feasible alternative can be found;
 - (b) The extent to which the ~~land-property~~ may not be beneficially used without approval of the demolition;
 - (c) The ability to obtain a reasonable return from the existing structures; and
 - (d) Whether or not the building, structure, or ~~land-property~~ contributes to a Historic Overlay ~~(HO)~~District, or no longer has historical significance.

Staff Comment: The amendments to Section 2.4.6(F) would clarify existing regulations and make various updates to reflect the new minor review process.

~~(F)~~(G) *Conditions of approval.* In approving a certificate of appropriateness, the PZB or LDR Administrator (as applicable based upon the type of review) may impose ~~appropriate~~ conditions on the permit approval in accordance with Section 2.2.14, *Conditions of approval*.

Staff Comment: The amendment to Section 2.4.6(G) would address the new minor review process.

(H) Amendments. A certificate of appropriateness may be amended only in accordance with the procedures and standards established for its original approval, provided however, that the LDR Administrator may approve minor modifications to a certificate of appropriateness previously approved by the PZB or by the LDR Administrator where it is found that the modifications would not result in a substantial change to the activity approved by the certificate of appropriateness.

Staff Comment: Presently, no mechanism exists to administratively approve minor modifications to a project after a Certificate of Appropriateness has been approved by the PZB. New Section 2.4.6(H) would authorize the LDR Administrator to approve minor modifications to a project when it is found that the modifications would not result in a substantial change to the approved activity.

~~(G)(I)~~ Appeal of PZB Decision on certificate of appropriateness. Any person aggrieved or affected by a decision of the Planning and Zoning Board may appeal such decision to the City Commission in accordance with Subsection 2.4.21 of this section, Appeal of decisions of the Planning and Zoning Board. Any person aggrieved or affected by a decision of the LDR Administrator may appeal such decision to the Board of Adjustment in accordance with Subsection 2.4.20 of this section, Appeal of interpretation or decision by LDR Administrator.

Staff Comment: The amendment to Section 2.4.6(I) would address the new minor review process.

AMENDING SECTION 3.7.2(A)(5)(a), RELATING TO THE REQUIREMENT TO OBTAIN A CERTIFICATE OF APPROPRIATENESS

3.7.2 Districts.

(A) HO, Historic Overlay District.

(5) HO district development standards.

(a) *Certificate of appropriateness required.* Once land, buildings, or structures are classified within an HO district, no demolition, removal, relocation, new construction, addition, or alteration of exterior architectural features shall occur within the district without the issuance of a certificate of appropriateness in accordance with Section 2.4.6, Certificate of appropriateness. The certificate shall occur prior to any demolition, new construction, addition, or alteration of exterior architectural features.

Staff Comment: The amendment to 3.7.2(A)(5)(a) are proposed for consistency with Section 2.4.6(A).

AMENDING SECTION 10.2, DEFINITION OF CERTIFICATE OF APPROPRIATENESS

Certificate of appropriateness means a permit reviewed and approved, approved with conditions, or denied by the Planning and Zoning Board or the LDR Administrator in accordance with Section 2.4.6, Certificate of appropriateness

Staff Comment: The amendment to the definition of a Certificate of Appropriateness in Section 10.2 would address the new minor review process.

PROPOSED CERTIFICATE OF APPROPRIATENESS APPROVAL MATRIX

As set forth in new Section 2.4.6(E)(3), the LDR Administrator may establish a Certificate of Appropriateness Approval Matrix identifying specific types of projects eligible for minor review, consistent with the types of projects defined in Section 2.4.6(E)(3). The Matrix is intended to serve as a user-friendly guide to assist the public in determining the type of review applicable for any project being considered within the Historic Overlay District.

Certificate of Appropriateness Approval Matrix

Activity	LDR Administrator	PZB	Exempt
Additions			
Residential addition of exterior feature (not visible from street) ¹			X
Residential addition of exterior feature (visible from street) ²	X		
Nonresidential addition of exterior feature		X	
Addition to building or structure listed on National Register of Historic Places		X	
Demolitions			
Residential demolition of exterior feature (not visible from street) ¹			X
Residential demolition of exterior feature (visible from street) ²	X		
Nonresidential demolition of exterior feature		X	
Demolition of building or structure listed on National Register of Historic Places		X	
New Construction			
<i>Residential new construction (not visible from street)</i>			
Pools / Pool Enclosures			X
Decks / Pergolas / Screen Rooms / Sun Rooms			X
Storage Buildings and Sheds			X
All other new residential construction (not visible from street)			X
<i>Residential new construction (visible from street)²</i>			
Carports	X		
Pools / Pool Enclosures	X		
Decks / Pergolas / Screen Rooms / Sun Rooms	X		
Storage Buildings and Sheds	X		
All other new residential construction (visible from street) ²	X		
Nonresidential new construction		X	
Alterations			
<i>Residential alteration of exterior feature (not visible from street)¹</i>			
Roofs			
Change in Roof Material	X		
Change in Roof Color	X		
Shutters	X		
Finish /Material of Exterior Walls	X		
Paint Colors	X		
Residential alteration of exterior feature (visible from street) ²	X		
Nonresidential alteration of exterior feature		X	
Alteration to exterior of building or structure listed on National Register of Historic Places		X	
Repair & maintenance which does NOT result in a change of more than 5% of exterior features (material or color)			X
Interior alterations ¹			X
Projects reviewed and approved under CRA Business Façade Grant Program			X
Relocation of a Building or Structure			
		X	
¹ Not applicable to buildings or structures listed on the National Register of Historic Places or to buildings or structures identified as a contributing building to the City of Alachua Downtown Historic District ² Not applicable to buildings or structures listed on the National Register of Historic Places			

FINDINGS OF FACT: COMPLIANCE WITH LAND DEVELOPMENT REGULATIONS

Subsection 2.4.1(E)(1) of the Land Development Regulations (LDRs) states that, “in determining whether to approve a proposed text amendment to the Land Development Regulations, the City Commission shall find that an application is consistent with the following standards.” These standards are listed below, followed by Staff’s evaluation.

- (a) ***Consistent with Comprehensive Plan*** – *Whether and the extent to which the proposed amendment is consistent with the Comprehensive Plan.*

Evaluation & Findings: These amendments are consistent with the Goals, Objectives, and Policies found within the City of Alachua Comprehensive Plan. The amendments will support and encourage projects and improvements within the Historic Overlay District to be conducted in a manner consistent with the objectives of the District by streamlining the review process for such improvements, thus furthering the intent of Goal 3 of the Future Land Use Element and the Objectives and Policies found therein.

- (b) ***Consistent with Ordinances*** – *Whether the proposed amendment is in conflict with any provision of these LDRs or the City Code of Ordinances.*

Evaluation & Findings: These amendments do not conflict with any provisions of the LDRs or the City Code of Ordinances.

- (c) ***Changed Conditions*** – *Whether and the extent to which there are changed conditions that require an amendment.*

Evaluation & Findings: In the process of implementing the current regulations pertaining to the Historic Overlay District and Certificates of Appropriateness, Staff has found that amendments could be made to establish a more efficient review process for certain minor projects or those which are proposed on residential properties. Currently, limited changes to building facades, even when occurring as part of ordinary maintenance and repair, and additions to residential uses not readily visible from public areas, such as streets, require the issuance of a Certificate of Appropriateness by the PZB. In order to create a more efficient and streamlined review process, Staff proposes to amend Section 2.4.6 and other related sections of the LDRs.

- (d) ***Community Need*** – *Whether and the extent to which the proposed amendment addresses a demonstrated community need.*

Evaluation & Findings: These amendments address a need to provide the residents and businesses within the Historic Overlay District a more streamlined review process for minor improvements to properties and minimal changes which are associated with ordinary repair and maintenance efforts.

- (e) ***Compatible with Surrounding Uses*** – *Whether and the extent to which the proposed amendment is consistent with the purpose and intent of the zone districts in these LDRs, or will improve compatibility among uses and will ensure efficient development within the City.*

Evaluation & Findings: By providing property owners a more streamlined review process, which will reduce the amount of time required to obtain necessary approvals of a Certificate of Appropriateness, these amendments will support and encourage compliance of individual property owners with these regulations. A more streamlined approach to application reviews will promote compliance with the regulations, thereby ensuring that improvements to buildings within the Historic Overlay District will be consistent with the historical, architectural, and other similar qualities which the District seeks to protect and preserve.

- (f) ***Development Patterns*** – *Whether and the extent to which the proposed amendment would result in a logical and orderly development pattern.*

Evaluation & Findings: These amendments would have no direct effect upon development patterns. As noted, the more streamlined approach to application reviews will promote compliance with the regulations, which would in turn ensure that improvements to properties within the Historic Overlay District are consistent with the character of the District, thus supporting a logical and orderly development pattern.

- (g) ***Effect on Natural Environment*** – *Whether and the extent to which the proposed amendment would result in significantly adverse impacts on the natural environment, including but not limited to water, air, noise, storm water management, wildlife, vegetation, wetlands, and the natural functioning of the environment.*

Evaluation & Findings: These amendments would not impact the natural environment.

- (h) ***Public Facilities*** – *Whether and the extent to which the proposed amendment would result in development that is adequately served by public facilities (roads, potable water, sewage, storm water management, parks, and solid wastes).*

Evaluation & Findings: These amendments would have no impact to the provision of public facilities.

EXHIBIT "A"
TO
CERTIFICATE OF APPROPRIATENESS
LAND DEVELOPMENT REGULATIONS (LDR) TEXT AMENDMENT
STAFF REPORT

SUPPORTING APPLICATION MATERIALS
SUBMITTED BY CITY STAFF TO THE
PLANNING AND ZONING BOARD