



**SAN MARCO  
PRESERVATION  
SOCIETY**

1468 Hendricks Ave  
Jacksonville Florida, 32207

January 22, 2020

City of Jacksonville Planning Commission  
214 North Hogan Street  
Jacksonville, FL 32202

Dear Chairman and Committee:

On behalf of the Board of Directors of the San Marco Preservation Society in its capacity as the registered neighborhood organization for San Marco, please accept the below feedback about the proposed Park Place at San Marco (L-5395-19C / 2019-0750 and 2019-0751) development project as the organization's qualifying written statement as defined in Section 656.137(e).

The SMPS' mission is to preserve the fabric of our unique neighborhood, and one of our core principles is to advocate for balance and compatible scale that fit and complement the neighborhood.

At time of writing, with the information currently available to the organization, we offer the following feedback about the proposed Park Place at San Marco (2019-0750 and 2019-0751) development project. Please note that the SMPS recognizes and holds appreciation for the fact that local developers, a local design team, and a local architecture team—many of whom are San Marco residents—are leading this project. This set of circumstances is not always the case, and could be considered a luxury by some. The above and below mentioned individuals have made themselves available to the neighborhood, residents, and neighborhood organizations, and accommodated a high level of involvement by the San Marco community in this project's modification. The SMPS would like to acknowledge the efforts of Harbert Realty Services, Corner Lot Development, Envision Design & Engineering, and Group 4 Design for their cooperation and willingness to work together to help make this project a better fit for the neighborhood. The SMPS looks forward to its continued collaboration with these entities.

Thank you for your time and consideration of the San Marco Preservation Society's feedback on this project.

Sincerely,

Linzee Ott  
President, Board of Directors

cc: City of Jacksonville Office of Legislative Services  
Jacksonville City Council Members  
City of Jacksonville Land Use and Zoning Committee



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**LAND USE AMENDMENT** – The SMPS opposes the requested land use reclassification of the entire property from CGC-UA and RPI-UA to CGC-UPA.

- The City’s 2030 Comprehensive Plan Future Land Use Element Policy 1.1.10A requires that certain criteria shall be considered in determining the appropriate maximum density for PUD rezonings. One such consideration is the transition of densities and comparison of percentage increase in density above average density of abutting developed properties. This property is situated between Low Density Residential – Urban Area (LDR-UA) and Community/General Commercial – Urban Priority Area (CGC-UPA). Low Density Residential single-family homes are located adjacent to this property on the south side, and RMD-A / RPI homes are located adjacent on the east side. The reclassification of this property to CGC-UPA would not provide proper transition between the adjacent CGC, RPI, and LDR uses. Furthermore, the up-zoning to Urban Priority Area land development designation into the historic Village District of San Marco would be incongruent with the spirit of transition of density.
- With current land use classification of CGC-UPA on the property to the north of this site, RPI on the property to the east, and LDR on the property to the south, the SMPS does not see that the reclassification of this site to CGC-UPA is an appropriate transition between current uses. According to page 52 of the 2018-684E North San Marco Neighborhood Action Plan (NSM NAP) Revised Exhibit 1, “a gradual transition of intensities and densities should be implemented and enforced in order to ensure neighborhood protection. This transition will help to maintain the balance between residential and commercial uses and prevent encroachment of commercial uses into residential areas.” The NSM NAP cautions on page 53, “‘up-zoning’ requests along the commercial corridors should be carefully reviewed with consideration for existing residential uses, and existing commercial uses should be evaluated for appropriateness and compatibility... Increasing the intensity of residential uses that are commercially zoned could be detrimental to the quality of life in the neighborhood.” The extension of the urban priority development area to this property abutting a LDR-UA area is unsupported by the NSM NAP.

**HEIGHT** – The SMPS opposes the height requested by this project.

- The SMPS disapproves of the use of a weighted averaging method as a means of establishing height calculations for this project. Typically, a maximum weighted average method is used to calculate the height of a building where ground elevation changes or undulates. Such is not the case for this property.
- Based on the standards prescribed by the San Marco Overlay in Section 656.399.7(d)1 and 656.399.7(e)1, this multifamily/commercial building must not exceed a height of 35 feet. Any deviation from the maximum building height shall follow the requirements outlined in 656.399.8(b)2 and 3. Furthermore, San Marco Overlay Zone and Ordinance 2016-367E prohibit any proposed or amended PUD “to authorize the relaxation of any standard set out in the San Marco Overlay Zone Subpart unless such relaxation is specifically allowed.”



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**PLANNING DEPARTMENT STAFF RECOMMENDED CONDITIONS** – To the extent that the proposed rezoning may be approved, SMPS supports the Planning Department’s proposed conditions to the approval of the rezoning set forth in the 1/17/2020 staff report and, in particular, to limit future permitted and permissible uses of Area A of the project to CRO.

**PROPOSED USE** – The SMPS supports the proposed use of the project. The proposed multi-family residential use is an appropriate use for this site, both with respect to compatibility with the current surrounding uses as well as the gradual transition in uses from commercial to residential.

**PARKING** – There are two considerations about parking, both residential and public, associated with this development application: 1) the exception being sought with respect to the parking being provided for the residents of the development and 2) the public parking being offered through shared use with South Jacksonville Presbyterian Church.

1. The application seeks an exception to the City’s code requirement of 1.75 parking spaces per bedroom over 500 square feet to a reduction to 1.3 parking spaces per unit. According to Section 656.399.7(d)(3), parking deviations as part of a PUD may only be granted if “all other standards” are met by the Overlay. As outlined above, the PUD does not meet the Overlay’s height standards, and therefore no parking deviation should be granted.
2. Page 52 of the NSM NAP Revised Exhibit 1 states, “requests for intensifications of zoning...should not be supported by the Planning and Development Department unless it can be demonstrated that there will be a benefit to the neighborhood.” The proposed development would include 276 total parking spaces, with 100 total spaces (87 vehicular, 3 motorcycle) that would be owned by South Jacksonville Presbyterian Church for their particular use. The Church has pledged the shared use of those spaces to the public during hours when they are not being used for church functions. This shared use proposal for these 100 parking spaces is consistent with the recommendation of the NSM NAP, as outlined on page 52 and specifically identified as a potential parking solution for this site on page 43.

**ARCHITECTURE** – The SMPS had concerns regarding initial architectural renderings presented to the community when the rezoning and land use amendment applications were filed in October 2019, however, we recognize the continued willingness to modify those renderings. The development and design teams have been receptive to the SMPS’ and community’s feedback. As a result, the architectural plans for the apartment building have been modified. To the extent that the rezoning may be approved, the SMPS requests that design development renderings of proposed architecture be attached as a condition to the ordinance approving the PUD, detailing and specifically outlining dimensions and materials of architectural features, such as niches, alcoves, and eyebrows.

**LANDSCAPING** – To the extent approved, the SMPS requests that all plans for landscaping on the property be included as conditions to the ordinance approving the PUD in the form of lists of materials and labeled depictions on the site plan.