

TO: Okaloosa Planning Staff and County Commissioners
FROM: Erik Bredfeldt, AICP, Project Manager, and George Kramer, AICP, Principal-In-Charge
DATE: September 13, 2024
SUBJECT: Local Planning Analysis Executive Summary

The Local Planning Analysis, as outlined in the RFP contract, must build upon the findings from the Task 1 Public Priorities Report, which was adopted by the Board of County Commissioners on May 16th, 2024. The key findings from the Task 1 Public Priorities Report were as follows:

- Strong desire to preserve the rural and agricultural character of North Okaloosa County
- Concern with inadequate infrastructure associated with existing development patterns and future growth in the community
- Alarm regarding a lack of transparency and inadequate coordination in managing growth

In addition to the Public Priorities Report key findings, the Local Planning Analysis Report must provide the analysis of North Okaloosa within the context of the constraints and opportunities that are outlined within the Task 4 Areas of Development Constraints Report, posted on the project website on August 5th, 2024. The Areas of Development Constraints Report has identified the following as constraints in further development that must be considered when contemplating approval of development orders:

- Environmental considerations (Habitat, Hydrology, Wetlands)
- USDA Prime Farmland designation
- Eglin Air Force Base, Hurlburt Field
- Property Rights

The Baseline Conditions Report detailed the analysis conducted to determine the North County Study area's carrying capacity¹ based on the existing Future Land Use and Zoning entitlements. This does not take into consideration any pending Development Orders. The report utilizes the University of Florida's Bureau of Economic and Business Research (BEBR) established medium level of population growth that would occur over the planning horizon to 2035. Importantly, the findings indicated that current levels of land use entitlements far exceeded population growth projections out to 2050. The BEBR medium projected population totals 48,747 for North Okaloosa County in 2050 and current entitlements would allow 129,535 additional residential units, for a population buildout of 351,039. If added to the current study area population of 40,764, this would result in a total buildout population in North Okaloosa County of 391,802 (pgs. 25-26).

¹ Carrying Capacity is best defined as: "the maximum number of people that can be supported by the environment of [an] area through optimum utilization of the available resources"

The recent **Capital Planning Overview Report** reported on the status of various existing infrastructure in North County regarding Utilities, Transportation, Water/Wastewater, Schools, Parks and Public Safety.

The **Areas of Development Constraints Report** provided an overview of the development constraints (Environmental, Agricultural, Eglin AFB) and opportunities (existing/planned infrastructure, the Shoal River Gigasite and the Urban Development Boundary) within the Study area and what the synthesis of the two may mean for future North County development prospects.

Importantly, this report introduces a tiered approach to support growth within the Urban Development Boundary and manage all future growth consistent with the Okaloosa County Comprehensive Plan Goals, Objectives and Policies.

Finally, as indicated, this **Local Planning Analysis Report** is intended to analyze the Goals, Objectives and Policies of the Okaloosa County Comprehensive Plan and the Okaloosa County Land Development Code to identify specific changes needed to ensure that growth occurs in a manner **consistent with the priorities as established by the BCC pursuant to Task 1 and will not negatively impact the constrained areas identified in Task 4.**

The key findings from the Local Planning Analysis Report and prior reports show that:

- 1) **There is an overallocation of entitlements which far exceeds population projections for the study area, leading to the key findings** as detailed in Task 1 Public Priorities Report. Furthermore, allowable conditional densities in the Agriculture and Rural Residential land uses perpetuate the approval of developments which are at odds with other Goals, Objectives, and Policies.
- 2) Despite the mandate established in Florida State Statute Chapter 163.3177(6)(a) 9.a. to prevent and reduce urban sprawl, the analysis indicates that urban sprawl is occurring within the study area due to the competing and often ambiguous guidance provided by the Okaloosa County Comprehensive Plan's Goals, Objectives, and Policies.
- 3) While the County has established an Urban Development Boundary to curtail urban sprawl, the ambiguous guidance provided by the Okaloosa County Comprehensive Plan has **yielded a pattern of development, both inside and outside the Urban Development Boundary that is largely indistinguishable.**

The Local Planning Analysis identifies 3 major areas of the Comprehensive Plan that need to be reviewed and modified inclusive of:

1. Urban Sprawl Prevention policies/Urban Development Boundary mechanisms
2. Conditional density increases for Agriculture and Rural Residential
3. Rural Community overlays

The Florida State Statutes set out regulations for urban growth and prevention of urban sprawl in Chapter 163.3177.

Florida State Statute Chapter 163.3177(6)(a) 9. a

9. The future land use element and any amendment to the future land use element shall discourage the proliferation of urban sprawl.

- a. The primary indicators that a plan or plan amendment does not discourage the proliferation of urban sprawl are listed below. The evaluation of the presence of these indicators shall consist of an analysis of the plan or plan amendment within the context of features and characteristics unique to each locality in order to determine whether the plan or plan amendment:
 - (I) Promotes, allows, or designates for development substantial areas of the jurisdiction to develop as low-intensity, low-density, or single-use development or uses.
 - (II) Promotes, allows, or designates significant amounts of urban development to occur in rural areas at substantial distances from existing urban areas while not using undeveloped lands that are available and suitable for development.
 - (III) Promotes, allows, or designates urban development in radial, strip, isolated, or ribbon patterns generally emanating from existing urban developments.
 - (IV) Fails to adequately protect and conserve natural resources, such as wetlands, floodplains, native vegetation, environmentally sensitive areas, natural groundwater aquifer recharge areas, lakes, rivers, shorelines, beaches, bays, estuarine systems, and other significant natural systems.
 - (V) Fails to adequately protect adjacent agricultural areas and activities, including silviculture, active agricultural and silvicultural activities, passive agricultural activities, and dormant, unique, and prime farmlands and soils.
 - (VI) Fails to maximize use of existing public facilities and services.
 - (VII) Fails to maximize use of future public facilities and services.
 - (VIII) Allows for land use patterns or timing which disproportionately increase the cost in time, money, and energy of providing and maintaining facilities and services, including roads, potable water, sanitary sewer, stormwater management, law enforcement, education, health care, fire and emergency response, and general government.
 - (IX) Fails to provide a clear separation between rural and urban uses.
 - (X) Discourages or inhibits infill development or the redevelopment of existing neighborhoods and communities.
 - (XI) Fails to encourage a functional mix of uses.
 - (XII) Results in poor accessibility among linked or related land uses.
 - (XIII) Results in the loss of significant amounts of functional open space.

The allowable conditional densities located within the Agricultural and Residential Rural Land Use Categories below are leading to development patterns that concern residents about a loss of agricultural and rural character and seem to result in lack of clarity between urban and rural living environments as emphasized in the Comprehensive Plan.

Objective 9 and its supporting policies below that are designed to discourage urban sprawl appear to be having little to no effect. Without clearer policy guidance, tying future development to the availability of infrastructure (most importantly sanitary sewer), the existing pattern of development should be expected to continue.

‘Agriculture’ and ‘Rural Residential’ Future Land Use Categories	
AGRICULTURE (AG)	Purpose: To provide areas for the production of plants and animals useful to humans including to a variable extent the preparation of plant and animal products for human use by sale or otherwise. This category is also suitable for preservation of green spaces, conservation uses, outdoor recreation, and public/institutional uses. Location/Designation Criteria: The AG category may be located either inside or outside the urban development area. Lands designated as AG should generally be at least 10 acres in size and be classified as “Agriculture” by the Property Appraiser for property tax purposes. Allowable Uses: The following uses are allowed in the AG category, all other uses are prohibited. Land, buildings, support machinery, and other appurtenances typically found in the production of agricultural products and activities including croplands, pasturelands, orchards, vineyards, nurseries, ornamental horticulture, groves, tree farms, timberland, feed lots, farm houses, barns, stables, pens, silos, farm accessory buildings and sheds, roadside produce stands, U-pick fields; conservation uses; outdoor recreation; public/institutional; solar electrical generation facilities and associated and related facilities; towers erected by government agencies for the purpose of official communication and emergency response (law enforcement, emergency medical service, evacuation, or national security); residential; general commercial when fronting upon an arterial or county-numbered roadway; rural communities; borrow pits; oil and gas exploration and production consistent with Conservation Element Policy 3.8 when approved by special exception. Allowable Density: No more than one (1) dwelling unit per ten (10) acres. One (1) dwelling unit per one (1) acre may be allowed when the following conditions are met. - Access for each 1 acre lot shall be from an existing state or county maintained roadway. - Each 1 acre lot shall have a minimum of 50 feet frontage on said state or county-maintained roadway. - Where two or less 1 acre lots are created access may be from a recorded easement.

	d. Development shall not be permitted in conservation areas or floodways. The provisions of a – e above shall not be applicable to lands classified as “prime farmland” by the U.S. Department of Agriculture. In these areas density shall be 1 du per 10 acres. Allowable Intensity: Nonresidential intensity shall be limited to a floor area ratio of 0.10 and impervious surface coverage no greater than 55%.
RURAL RESIDENTIAL (RR)	Purpose: To provide areas for low density residential land uses and residential development that is not directly related to agricultural activities but still provides an opportunity for residential living in a rural setting which may include agricultural and recreation activities as well as keeping of animals, hobby farms, ranchettes, or estate lots. Location/Designation Criteria: The RR category is allowed inside and outside the urban development boundary. Allowable Uses: The following uses are allowed in the RR category, all other uses are prohibited. Single-family detached dwellings; category A and B mobile/manufactured homes; customary accessory uses/structures including farm buildings such as barns and stables; small-scale agricultural activities; places of worship; schools; family day care; community residential homes; schools; private airstrips; residential airparks as a special exception; recreation activities; conservation; public or private utilities; and towers erected by government agencies for the purpose of official communication and emergency response (law enforcement, emergency medical service, evacuation, or national security). Allowable Density: No more than one (1) dwelling unit per five (5) acres except for areas located within designated Rural Communities where the allowable density may be one (1) dwelling unit per acre subject to the following conditions. - When ten or less 1 acre lots are created access must be from an existing county or state-maintained roadway. - Each lot created shall have a minimum of 50-foot frontage along said roadway. - The creation of more than ten (10) lots shall be considered a subdivision subject to county subdivision regulations. - When one or two 1 acre lots are created access may be from a recorded easement. Allowable density may be two (2) dwelling units per acre subject to the following conditions. - For the creation of one or two one-half acre lots access may be provided from a recorded easement. - for the creation of more than two one-half acre lots each lot must have access from a county or state-maintained roadway. The construction of a new road with subsequent dedication to the county will be considered a county-maintained roadway. The creation of more than three lots shall be considered a subdivision

	subject to county subdivision regulations.
OBJECTIVE 9	Urban sprawl is not a desirable development pattern. It shall be discouraged and/or reduced through the following techniques: - the use of the appropriate designation of land for future land uses on the Future Land Use Map; - the establishment of an urban development boundary area; - policies regarding provision, location, and expansion of urban services and facilities; - policies regarding conversion of agricultural and rural lands to urban uses; - encouraging appropriate infill development; - encouraging redevelopment; and - encouraging the reuse of existing facilities.
Policy 9.1	An urban development area is established and depicted on the Future Land Use Map. The urban development area boundary encompasses those lands within Okaloosa County that are, or are expected to become, urban. When designating the urban development area the following criteria shall be applied. - The area must be developed to include a mix of residential, commercial, industrial, institutional, recreation, and other land uses. - The average population density throughout the area is generally no less than 500 persons per square mile. - Typical urban services including central water and sewer are or will be available.
Policy 9.2	In the evaluation of proposed land use amendments for land in the “agricultural” or “rural residential” categories, the application shall demonstrate the following: - the need for such land use amendment; - the amendment will not result in urban sprawl; - a functional relationship of the proposed amendment to other more densely or intensely designated or development lands; - the availability of facilities and services for a more dense or intense land use; and - the relationship of the proposed amendment site to the urban development area boundary.
Policy 9.3	Consideration of expansion of the urban development area boundary shall require demonstration of the following: - additional land is required at urban densities and intensities to meet the needs of development within Okaloosa County; - lands within the existing urban development area are not capable or suitable for urban development, with the resulting need for additional land to meet the existing need for urban development; - population growth projections have changed with a resulting need for additional land at

	urban densities or intensities; d. changes in the economy, lifestyle, housing styles, or development expectations result in a need for additional land at urban densities or intensities; e. facilities and services are available or planned to be available concurrent with development to meet the needs of the expanded urban development area; f. expansion of the urban development area does not result in a negative impact on environmentally sensitive lands or natural resources;
Policy 9.4	Land use plan amendments will not alter the boundaries of the various water and sewer service areas, as depicted on the Water and Sewer Service Area Map, unless such alteration is pursuant to a currently existing or subsequently entered into written agreement, entered into between the County, a municipality or some other water and sewer service provider, which governs such boundary change.
Policy 9.5	The County shall prioritize its capital improvements funding in a manner that generally assigns first priority to the renewal, reuse and/or rehabilitation of existing facilities or the replacement of existing obsolete or worn out facilities as a preferred alternative to new construction when feasible.
Policy 9.6	The County shall encourage infill through the use of higher density and higher intensity land use designations and mixed-use designations in area desirable for infill development, and through the use of density bonuses or targeted redevelopment programs. The approval of infill projects shall not result in incompatible land use or incompatible development, pursuant to Policies 4.1 through 4.5.
Policy 9.7	Public services and facilities shall be located on sites consistent with the urban development area and consistent with the principle of containing urban sprawl.
Rural Community Overlay	
Policy 10.1B	There is hereby created the “Rural Community” FLUM overlay zone to promote infill development within existing rural developed areas that is intended to make available basic services to residents in the rural community and the surrounding rural area. These services may include retail sales and services as well as community facilities such as fire stations, post office, community center, etc. The Rural Community overlay is further intended to provide areas for more compact residential development in the immediate vicinity while preserving the rural nature and character of outlying rural areas. At a minimum , the Rural Community overlay should be delineated around the Baker and Holt communities.

Future Land Use Element Recommendations

Existing Policy	Application	Remedy
‘Agriculture’ and ‘Rural Residential’ Future Land Use Categories		
AGRICULTURE (AG)	Agriculture, which is intended to be ‘rural’, not ‘urban’, is allowed both inside and outside of the Urban Development Boundary (UDB). When certain conditions are met, a 1 DU per 1 Acre residential density is allowed, which is inconsistent with the intended agricultural character of the Future Land Use Category (FLUC). The conditions are easily met by most parcels outside the UDB. There are few additional policies regulating the development of 1DU/AC in agriculture FLUC.	Effective April 1, 2026, remove conditional density provision of 1 unit per 1 acre in Tier 3. (affected property owners to be properly notified no less than 1 year prior to the effective date of the amendment).
RURAL RESIDENTIAL (RR)	Rural Residential, which is intended to be ‘rural’, not ‘urban’, is allowed both inside and outside of the UDB. Current allowable densities within Rural Residential do not support the intended character of this FLUC. When certain conditions are met, a 1 DU per 1 Acre residential density is allowed, which is inconsistent with the intended rural residential character of the FLUC. The conditions are easily met by most parcels outside the UDB. There are few additional policies regulating the development of 1DU/AC in rural residential FLUC. In addition, the Rural Residential FLUC also allows for 2 Dwelling units per 1 acre, again, when fairly easily accessible conditions are met.	Effective April 1, 2026, remove conditional density provision of 1 unit or 2 units per acre in Tier 3 (affected property owners to be properly notified no less than 1 year prior to the effective date of the amendment).
Urban Development Boundary		
Objective 9	The County Comprehensive Plan is not effectively encouraging infill development, redevelopment, or adaptive reuse of existing facilities Policies addressing the appropriate uses of future land use designations, the urban development boundary, or expansion of urban	Adopt and enforce revised policies that better direct future growth inside the UDB and preserve rural character outside of the UDB through a <i>tiered</i> system.

	services and facilities are ambiguous and difficult to enforce.	
Policy 9.1	The urban development boundary currently has a population density that is less than 500 persons per square mile. Areas within the urban development boundary do not have access to central sewer and water. Conversely, areas outside of the urban development boundary are receiving access, and are allowed to develop at suburban densities when expansions of central sewer and water are expected.	Align the provision of public services with the existing Urban Development Boundary and a tiered growth management system.
Policy 9.2	Evaluation of land use amendments in the Agricultural and Residential Rural land use designations should follow the listed policy criteria and follow the tiered growth management system.	Consider deletion of the Policy 9.2 and replace with a strengthened Urban Development Boundary and a tiered growth management system.
Policy 9.3	The existing Urban Development Boundary was last expanded in 2009.	Evaluate the existing Urban Development Boundary considering the existing and planned provision of public services and existing/future development patterns.
Policy 9.4	Existing Water and Sewer Maps are still utilized as policy guidance tools in the Comprehensive Plan.	No change.
Policy 9.5	This is an inherent part of the County's Capital Improvement review process.	Review this policy and it is recommended that it be implemented but should be reviewed for County policy guidance.
Policy 9.6	The County, at the staff level, is encouraging infill development within the urban development boundary, or incentivizing the reuse, renewal, or redevelopment of existing facilities.	Review this policy and it is recommended that it be implemented but should be reviewed for County policy guidance.
Policy 9.7	The current Urban Development Boundary strategy is not resulting in urban infill, as public services and facilities do exist outside the urban development boundary that is intended to contain and prevent urban sprawl.	Align the provision of public services with the existing Urban Development Boundary and a tiered growth management system.

Rural Community Overlay		
Policy 10.1B	The overlay provides minimal guidance on how it will drive infill development within the overlay boundaries, what development standards are in place to encourage ‘compact development’	Recommendation to complete special area plans for existing Rural communities in Holt and Baker.

Other Elements in the Okaloosa County Comprehensive Plan contain policies that can be further strengthened to yield more desirable development and rural preservation outcomes.

Existing Policy	Recommendation
Chapter 2.4 Sanitary Sewer Element	
	Align the provision of public services with the existing Urban Development Boundary and a tiered growth management system.