



PLANNING COMMISSION MEETING

December 2, 2025

5:00 PM

Administration Building,
4th Floor, BCC Meeting Room, 477 Houston Street,
Green Cove Springs, FL 32043

Pledge of Allegiance

Call to Order

1. **Approval of Minutes**

Planning Commission Meeting Minutes November 4, 2025.

Public Comment

Public Hearings

1. Public Hearing to consider ZON 25-0027. (District 4, Comm. Condon) (J. Bryla)
This application cannot be heard at this time as the Applicant did not advertise the item.

This application is a Rezoning to change 2.51+/- acres from Commercial and Professional Office District (BA-2) to Community Business District (BB-2).

2. Public Hearing to consider ZON 25-0033. (District 4, Comm. Condon) (J. Bryla)
An Ordinance to administratively rezone four lots within the Keystone airport from the Industrial Select (IS) zoning district to Heavy Industrial (IB) zoning district to accommodate airport uses and equipment.

Presentations

Old Business/New Business

Public Comment

Adjournment

In accordance with the Americans with Disabilities Act, any person needing accommodations to participate in this matter should contact Clay County Risk Management by mail at P.O. Box 1366, Green Cove Springs, Florida 32043, or by telephone at (904) 679-8596, no later than three (3) days prior to the hearing or proceeding for which this notice has been given. Deaf and hard-of-hearing persons can access the telephone number by contacting the Florida Relay Service at 1-800-955-8770 (Voice) or 1-800-955-8771 (TDD).



Agenda Item
PLANNING COMMISSION

Clay County Administration Building
Tuesday, December 2 5:00 PM

TO: DATE:

FROM:

SUBJECT:

AGENDA
ITEM
TYPE:

ATTACHMENTS:

Description	Type	Upload Date	File Name
Planning Commission Meeting Minutes November 4, 2025	Backup Material	11/21/2025	Planning_Commission_Meeting_Minutes_and_Attachments_November_4__2025dsada.pdf



PLANNING COMMISSION MEETING MINUTES

November 4, 2025

5:00 PM

Administration Building,
4th Floor, BCC Meeting Room,
477 Houston Street,
Green Cove Springs, FL 32043

Pledge of Allegiance

Commissioner Joe Anzalone led the Pledge of Allegiance.

Call to Order

Present:

Commissioner Pete Davis, Chairman
Commissioner Howard "Bo" Norton, Vice-Chairman
Commissioner Mary Bridgman
Commissioner Michael Bourré
Commissioner Joe Anzalone
Commissioner Ralph Puckhaber
Commissioner Bill Garrison
School Board Representative Paul Bement

Absent:

Camp Blanding Representative Sam Tozer

Staff Present:

County Attorney Courtney Grimm
Director of Planning and Zoning Beth Carson
Planning Chief Dodie Selig
Economic and Development Services Coordinator Kellie Henry
Clay County Real Estate Acquisitions Manager Caleb Risinger
Director of Engineering Richard Smith

Chairman Pete Davis called the meeting to order at 5:01 pm.

Chairman Pete Davis recognized county staff members, introduced the Board members, and thanked Deputy Butler and Deputy Eck for providing security.

1. **Approval of Minutes**

Planning Commission Meeting Minutes October 7, 2025.

Commissioner Michal Bourré made a motion for approval of the October 7, 2025, Planning Commission Meeting minutes, seconded by Commissioner Bo Norton, which carried unanimously.

Public Comment

Chairman Pete Davis opened the floor for public comment at 5:04 pm.

Hearing no comments, Chairman Pete Davis closed public comment at 5:04 pm.

Before commencing the public hearing all those wishing to speak were sworn in.

Public Hearings

1. First Public Hearing to consider PUD 25-0008 (District 5, Comm. Burke) (D. Selig)
This application is a Rezoning of the entirety of one parcel and a portion of a second parcel under the ownership of Larmac Development, LLC from Planned Unit Development (PUD) to Planned Unit Development (PUD and of a portion of a third parcel under the ownership of Clay County, from Lake Asbury Rural Fringe (LA RF) to Planned Unit Development (PUD). The purpose of the application is to amend certain portions of the development requirements related to the commercial parcel and to replace the site plan for the commercial parcel. No changes are proposed for the residential portions of the existing PUD.

Item One (1) can be seen at [www.claycountygov.com/government/clay-county-tv-and-video/archive/Planning Commission/November 4, 2025](http://www.claycountygov.com/government/clay-county-tv-and-video/archive/Planning%20Commission/November%204,%202025), beginning at 6:50 and ending at 29:42. Below is a summary of the discussion and the vote for this agenda item.

Dodie Selig, Planning Chief, presented a PowerPoint presentation to provide details and information for the public hearing to consider PUD-25-0008, as described above. See Attachment A.

There were comments regarding buffering/fencing, ROW, and access.

Frank Miller, 1 Independent Drive, Jacksonville, Florida, the applicant's agent, addressed the Commission to provide more details regarding the requested change.

There were clarifying questions and discussions between the Commission and Mr. Miller regarding the buffer on the east side/fencing, sidewalk placement, pedestrian access, wetlands, and access to the parcel.

Chairman Pete Davis opened the floor for the public hearing at 5:28 pm.

Harold Knowles, 2098 Knowles Road, addressed the Commission with concerns regarding the requested change.

Hearing no other comments, Chairman Pete Davis closed the public hearing at 5:29 pm.

Commissioner Ralph Puckhaber made a motion for approval, seconded by Commissioner Michael Bourré, which carried unanimously.

2. First Public Hearing to consider COMP 25-0013 and PUD 25-0007 (District 5, Comm. Burke) (D. Selig)

This application is a Large-Scale Comprehensive Plan Amendment to the 2045 Future Land Use Map (FLUM). The application would change the future land use designation of some or all of four parcels of land as shown in the table below. The applicant is proposing to develop a single-family subdivision, consisting of 160 lots.

Item Two (2) can be seen at [www.claycountygov.com/government/clay-county-tv-and-video/archive/Planning Commission/November 4, 2025](http://www.claycountygov.com/government/clay-county-tv-and-video/archive/Planning%20Commission/November%204,%202025), beginning at 29:50 and ending at 3:21:45. Below is a summary of the discussion and the vote for this agenda item.

Dodie Selig, Planning Chief, presented a PowerPoint presentation to provide details and information for the public hearing to consider COMP-25-0013 and PUD-25-0007, as described above. See Attachment B. Ms. Selig provided emails/letters submitted in opposition to the requested change. See Attachment C.

Mark Shelton, Senior Urban Planner; Bill Schilling, Civil Engineer; and Garrett Queener, Land Planning and Entitlements Manager at Kimley-Horn and Associates, agents for the applicant, presented a PowerPoint to the Commission to provide more details regarding the requested change. See Attachment D.

There were questions, clarifications, and discussions regarding traffic study information, traffic impact projections, setbacks, and zoning categories.

Chairman Pete Davis opened the floor for the public hearing at 6:06 pm.

Ryan Marcyes, 1699 Shedd Road, Green Cove Springs, Florida, and Springs CAC Chairman, addressed the Commission regarding the CAC's opposition to the requested change.

The Commission and Mr. Marcyes discussed the CAC objection, the school's consideration of concurrency, the CR315 road alignment, the connection timeline to the Clay Dairy Parkway, and traffic concerns.

Sue Wiseman, 2231 Stauffer Road, Green Cove Springs, Florida, waived the right to speak but noted her opposition to the application in writing.

Kim Stacy, 2248 Stauffer Road, Green Cove Springs, Florida, addressed the Commission in opposition to the requested change.

Danny Smith, 2248 Stauffer Road, Green Cove Springs, Florida, addressed the Commission in opposition to the requested change.

Justin Garber, 2254 Stauffer Road, Green Cove Springs, Florida, addressed the

Commission in opposition to the requested change.

George Goodrich, 3376 CR315A, Green Cove Springs, Florida, addressed the Commission in opposition to the requested change.

Susan Goodrich, 3376 CR315A, Green Cove Springs, Florida, addressed the Commission in opposition to the requested change.

Patricia Fernandez, 3009 Russell Road, Green Cove Springs, Florida, addressed the Commission in opposition to the requested change.

Teresa Arellano, 765 Duart Drive, Orange Park, Florida, addressed the Commission in opposition to the requested change.

Kimberly Middleton, 226 Knowles Road, Green Cove Springs, Florida, addressed the Commission in opposition to the requested change.

Rueben Moody, 1375 Pacetti Road, Green Cove Springs, Florida, addressed the Commission in opposition to the requested change.

Cheryl Copeland, Smith Station, AL, speaking on behalf of the applicants, addressed the Commission in support of the requested change.

Harry Colley, 3859 CR315, Green Cove Springs, Florida, addressed the Commission in support of the requested change.

Marlene Strube, 3802 Floyd Road, Green Cove Springs, Florida, waived the right to speak but noted her opposition to the application in writing.

Sharon Barnard, 1937 SR16W, Green Cove Springs, Florida, addressed the Commission in opposition to the requested change.

Sandra Dunnavant, a Green Cove Springs, Florida resident, addressed the Commission in opposition to the requested change.

Rose Knowles, 2098 Knowles Road, Green Cove Springs, Florida, addressed the Commission in opposition to the requested change.

Harold Knowles, 2098 Knowles Road, Green Cove Springs, Florida, addressed the Commission in opposition to the requested change.

Susan Pasquali, 1724 Colonel Drive, Green Cove Springs, Florida, addressed the Commission in opposition to the requested change.

Mark Willimon, 2016 Knowles Road, Green Cove Springs, Florida, addressed the Commission in opposition to the requested change.

Serena Willimon, 2016 Knowles Road, Green Cove Springs, Florida, addressed the Commission in opposition to the requested change.

Melissa Smith, 2135 Compound Lane, Middleburg, Florida, addressed the Commission in opposition to the requested change.

Chris Pippin, a resident of Green Cove Springs, Florida, addressed the Commission in opposition to the requested change.

Ryan Worthington, 5665 Sharron Road, Green Cove Springs, Florida, addressed the Commission in opposition to the requested change.

Robert McCormack, 6566 Sandhill Road, Green Cove Springs, Florida, waived the right to speak but noted his opposition to the application in writing.

Laura McCormack, 6566 Sandhill Road, Green Cove Springs, Florida, waived the right to speak but noted her opposition to the application in writing.

Megan Rhodes, 1716 Ivey Road, Green Cove Springs, Florida, waived the right to speak but noted her opposition to the application in writing.

Helana Cormier, 2839 Woodbridge Crossing Court, Green Cove Springs, Florida, addressed the Commission to express her gratitude for the Commission's service and to raise concerns about the requested change.

Russell Smith, 3873 CR 315A, Green Cove Springs, Florida, addressed the Commission in opposition to the requested change.

Ryan Marcyes, 1699 Shedd Road, Green Cove Springs, Florida, addressed the Commission in opposition to the requested change.

Hearing no other comments, Chairman Pete Davis closed the public hearing at 7:33 pm.

The team from Kimley-Horn and Associates addressed concerns raised during the public hearing.

There were questions and discussions regarding proposed setbacks, home sizes, drainage, stormwater, intersection improvements, and school concurrency.

Following comments by the Commission on the requested change and proposed development, Commissioner Bill Garrison made a motion for approval COMP-25-0013, seconded by Commissioner Michael Bourré, which carried 5-3, with Commissioners Bo Norton, Joe Anzalone, and Ralph Puckhaber in opposition.

Commissioner Bill Garrison made a motion for approval of PUD-25-0007, seconded by Commissioner Michael Bourré, which carried 5-3, with Commissioners Bo Norton, Joe Anzalone, and Ralph Puckhaber in opposition.

Presentations

There were no other presentations.

Old Business/New Business

There was no new/old business discussed.

Public Comment

Chairman Pete Davis opened the floor for public comment at 8:23 pm.

Hearing no comments, Chairman Pete Davis closed public comment at 8:23 pm.

Adjournment

Hearing no further business, Chairman Pete Davis adjourned the meeting at 8:23 pm

Attest:

Committee Chairman

Recording Deputy Clerk

Attachment
“A”
PUD-25-0008

Rezoning Application:
PUD 25-0008

Board of County Commissioners
November 10, 2025



Application Information

Applicant: Larmac Development, LLC

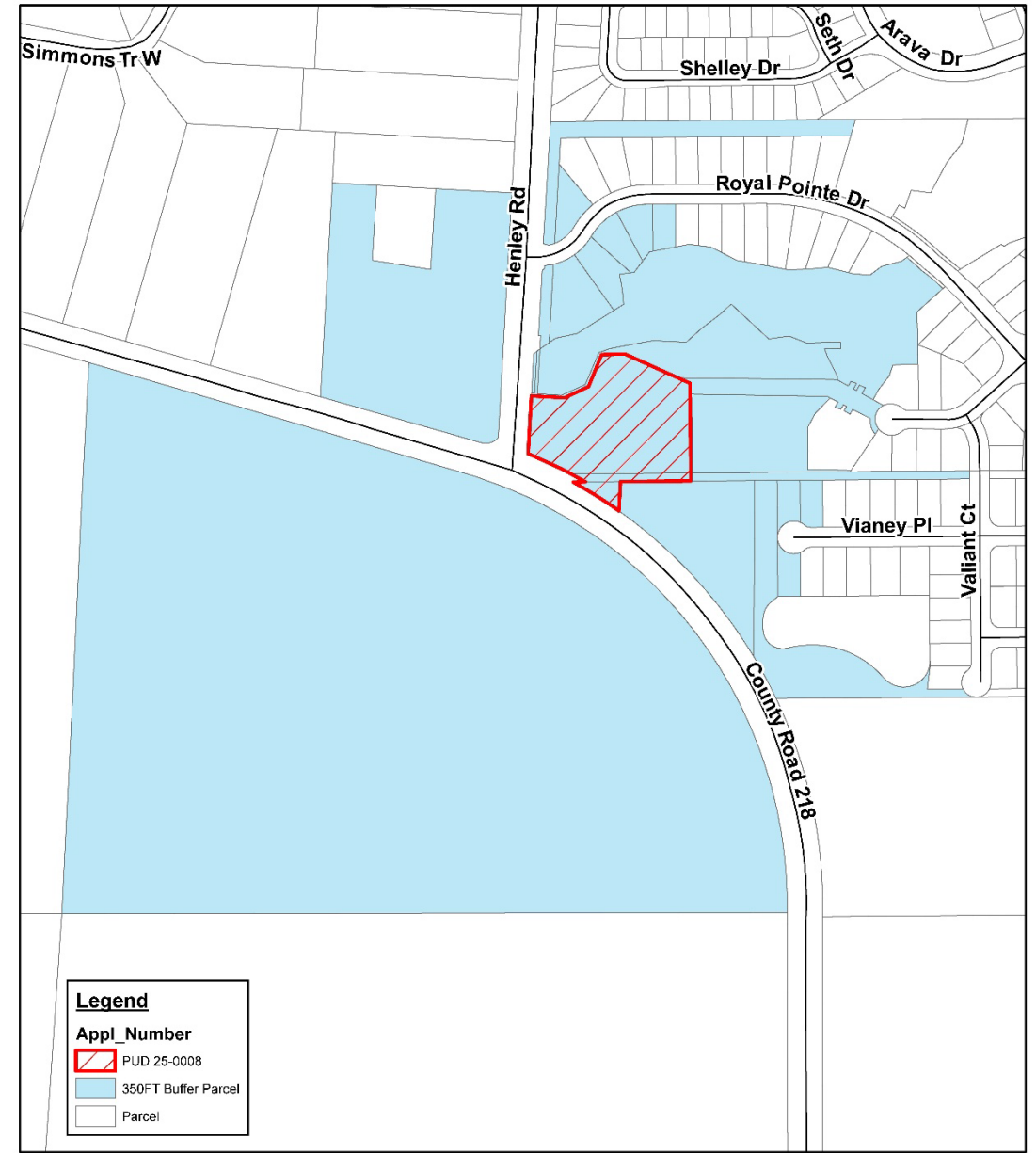
Agent: Frank Miller, Gunster, Yoakley & Stewart, P.A.

Location: on the east side of Henley Road at the CR 218 intersection

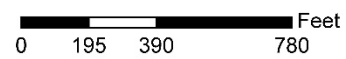
Planning District: Lake Asbury/Penney Farms

Commission District: 5 Commissioner Burke

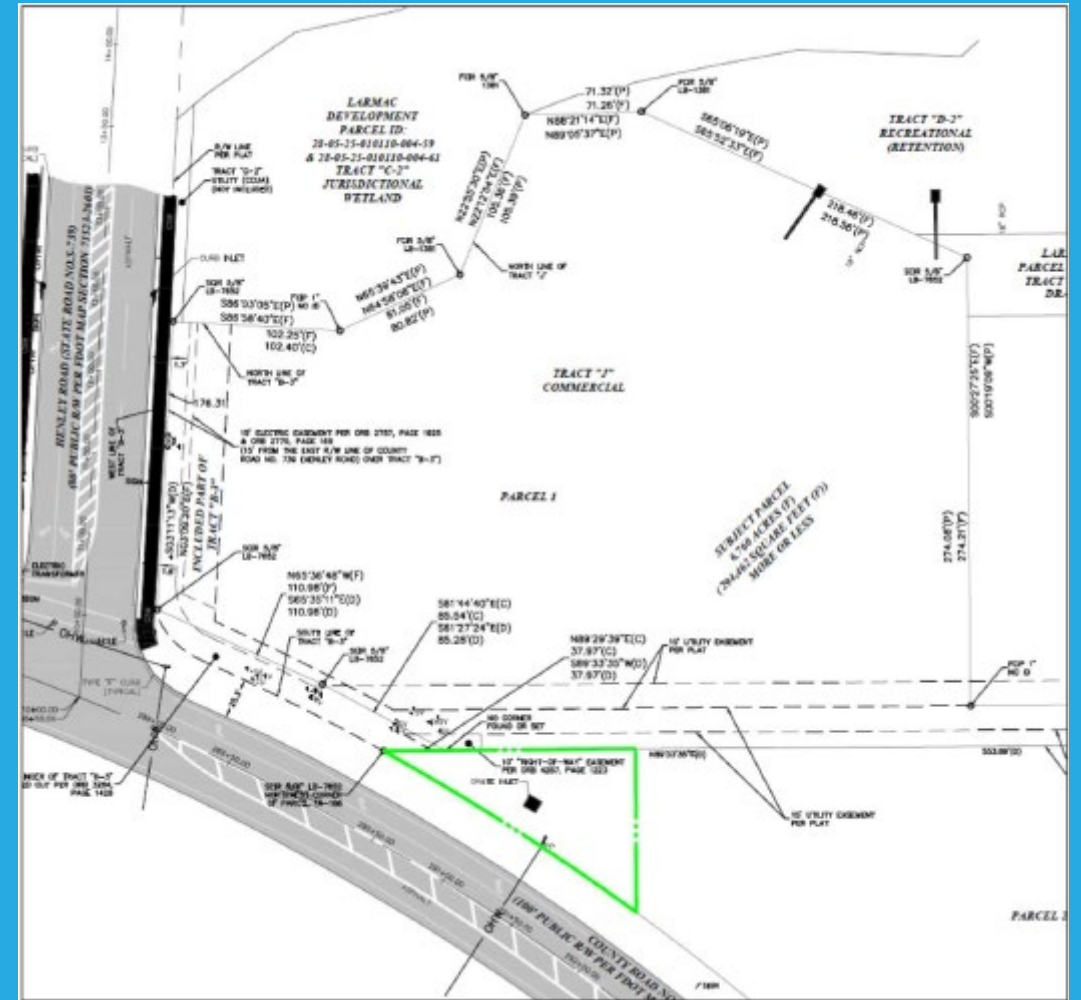
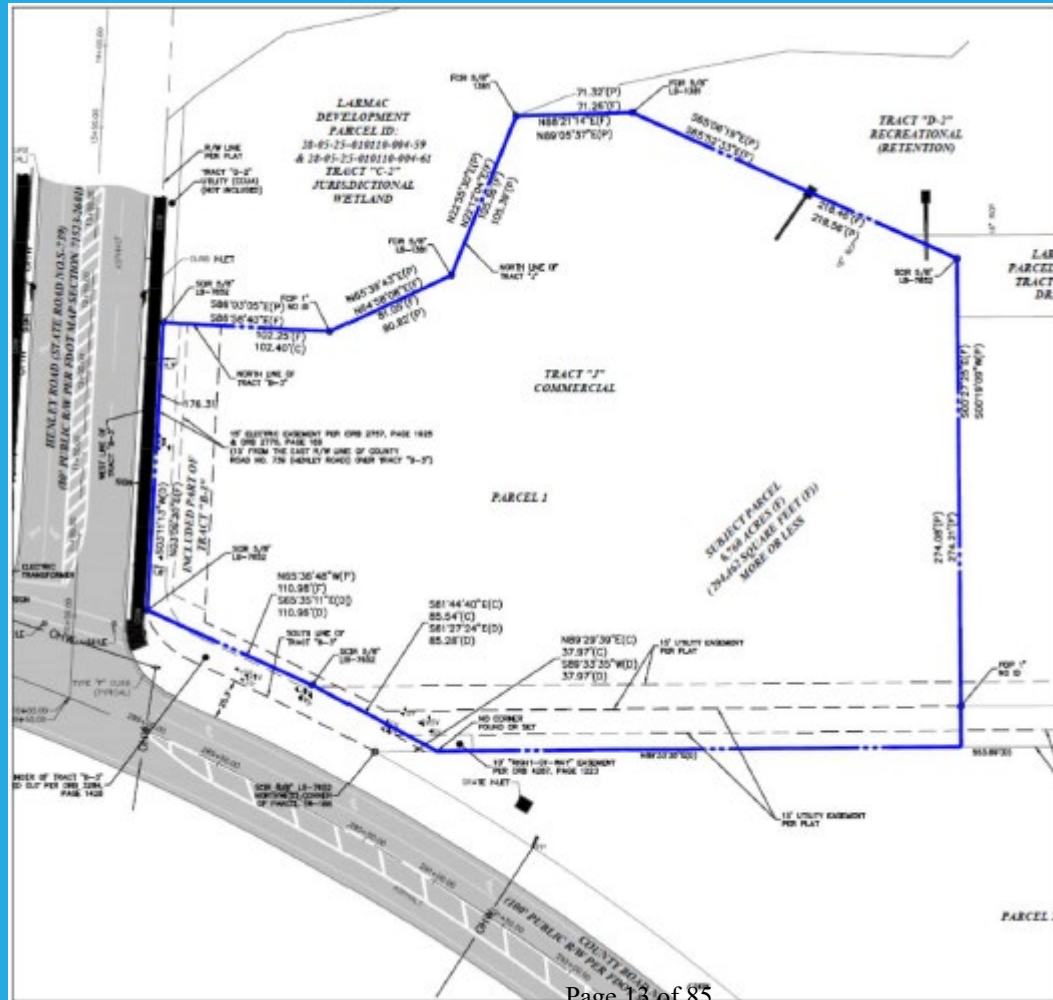
- PUD 25-0008 would change the zoning from Planned Unit Development (PUD) and Lake Asbury Rural Fringe (LA RF) to Planned Unit Development (PUD).



**350' Parcel Notifications Map
PUD 25-0008**



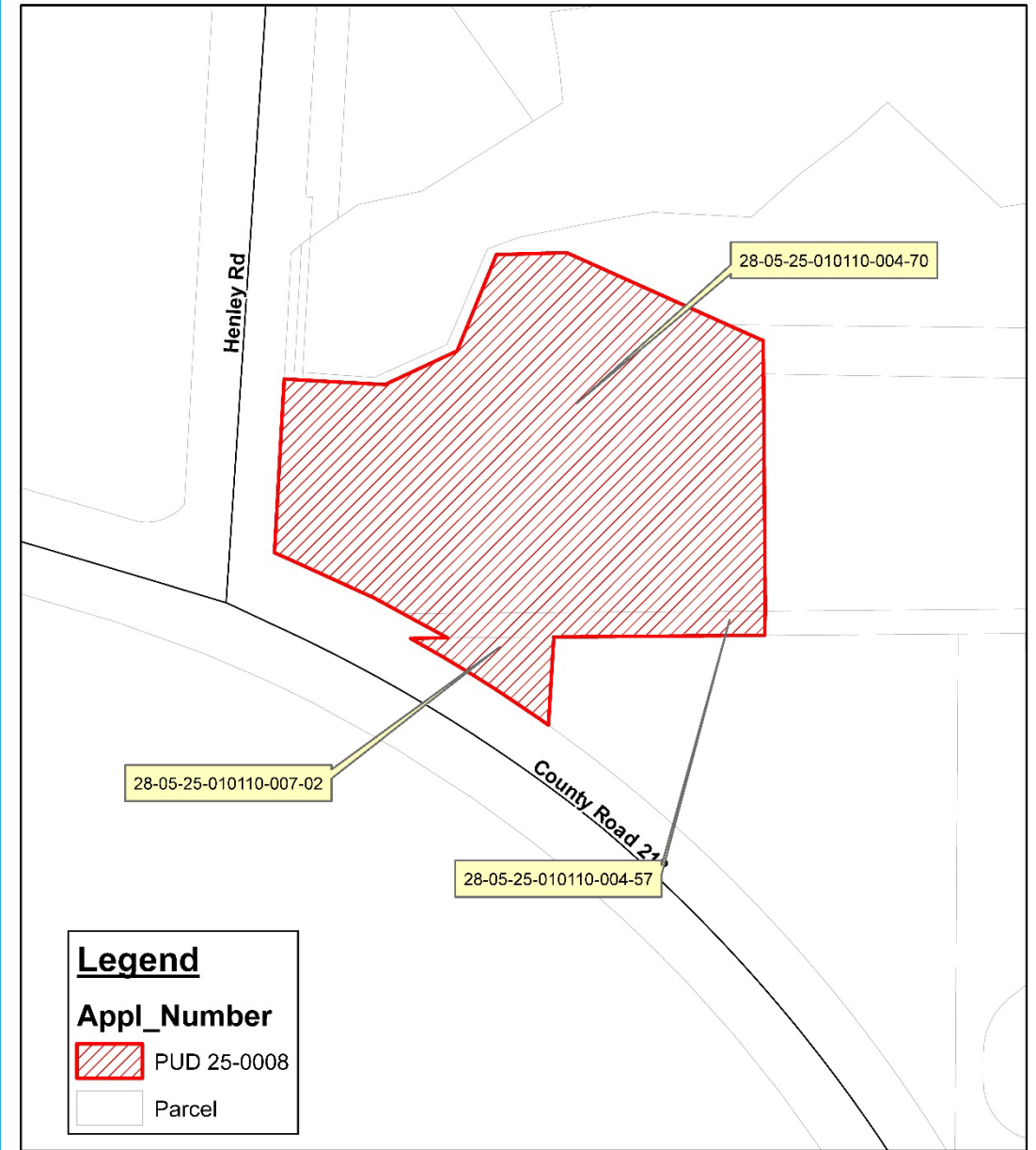
Parcel Number	Acreage	Ownership	Current Zoning District
28-05-25-010110-004-70	3.1 acres	Larmac Development, LLC	PUD
28-05-25-010110-004-57	0.19 acre portion	Larmac Development, LLC	PUD
28-05-25-010110-007-02	0.169 acre portion	Clay County	LA RF





0 170 340 680 Feet

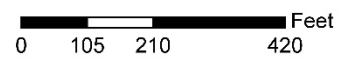
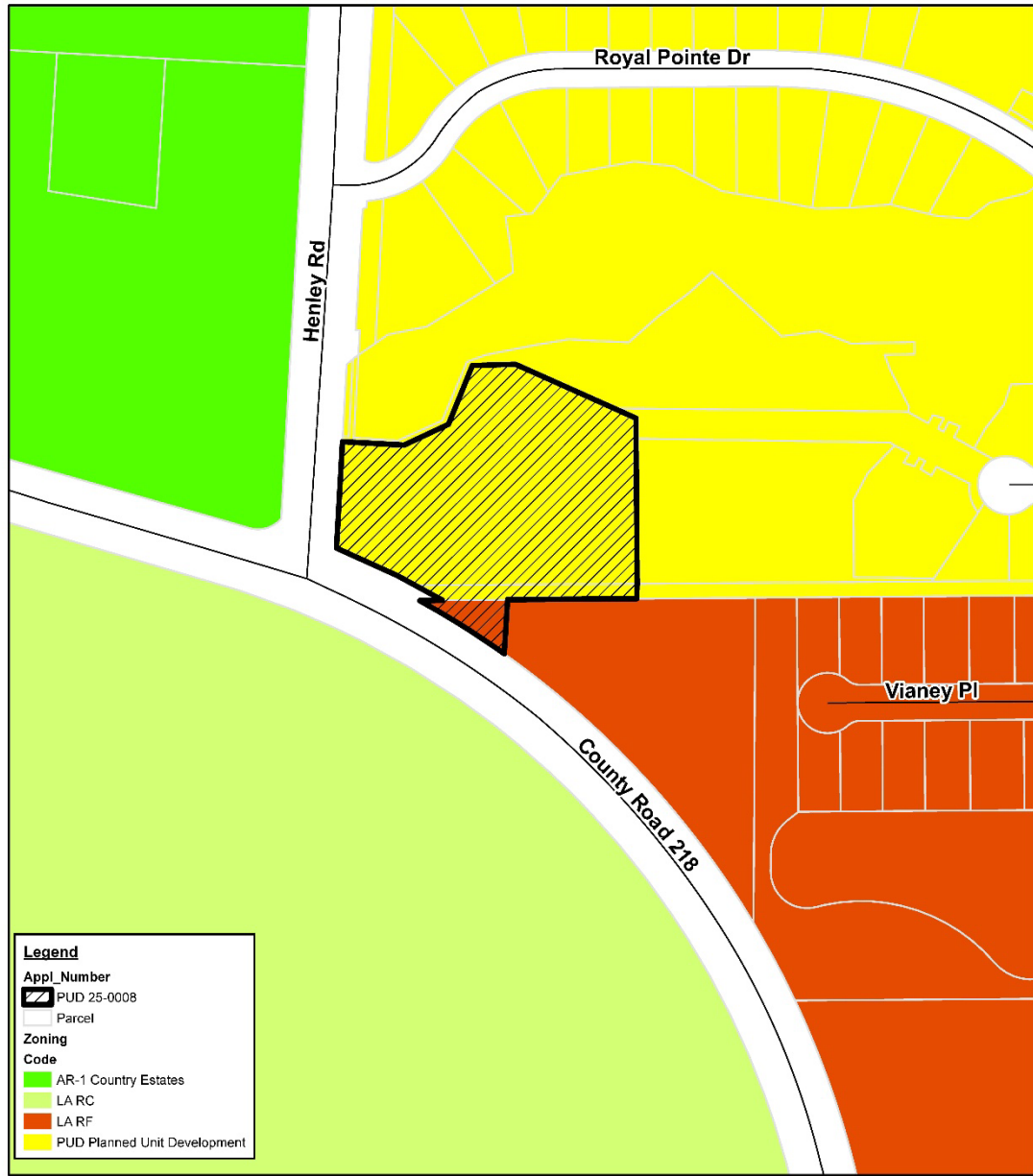
Rezoning: PUD 25-0008
from LA RF and PUD to PUD
 Page 14 of 85



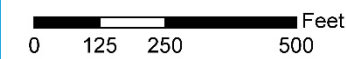
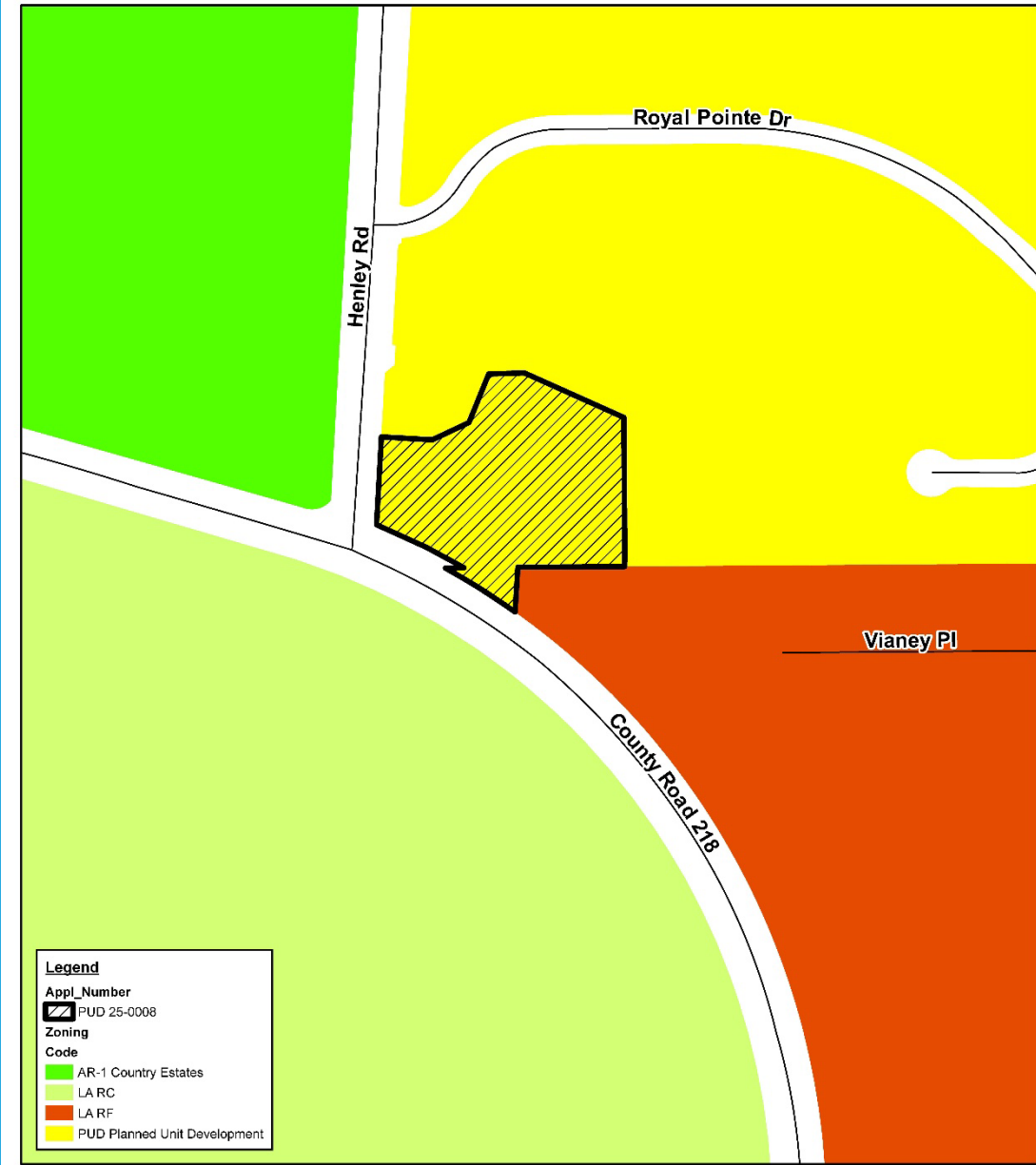
0 62.5 125 250 Feet

Parcel Location Map
PUD 25-0008



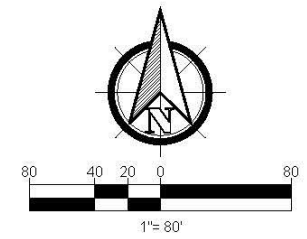
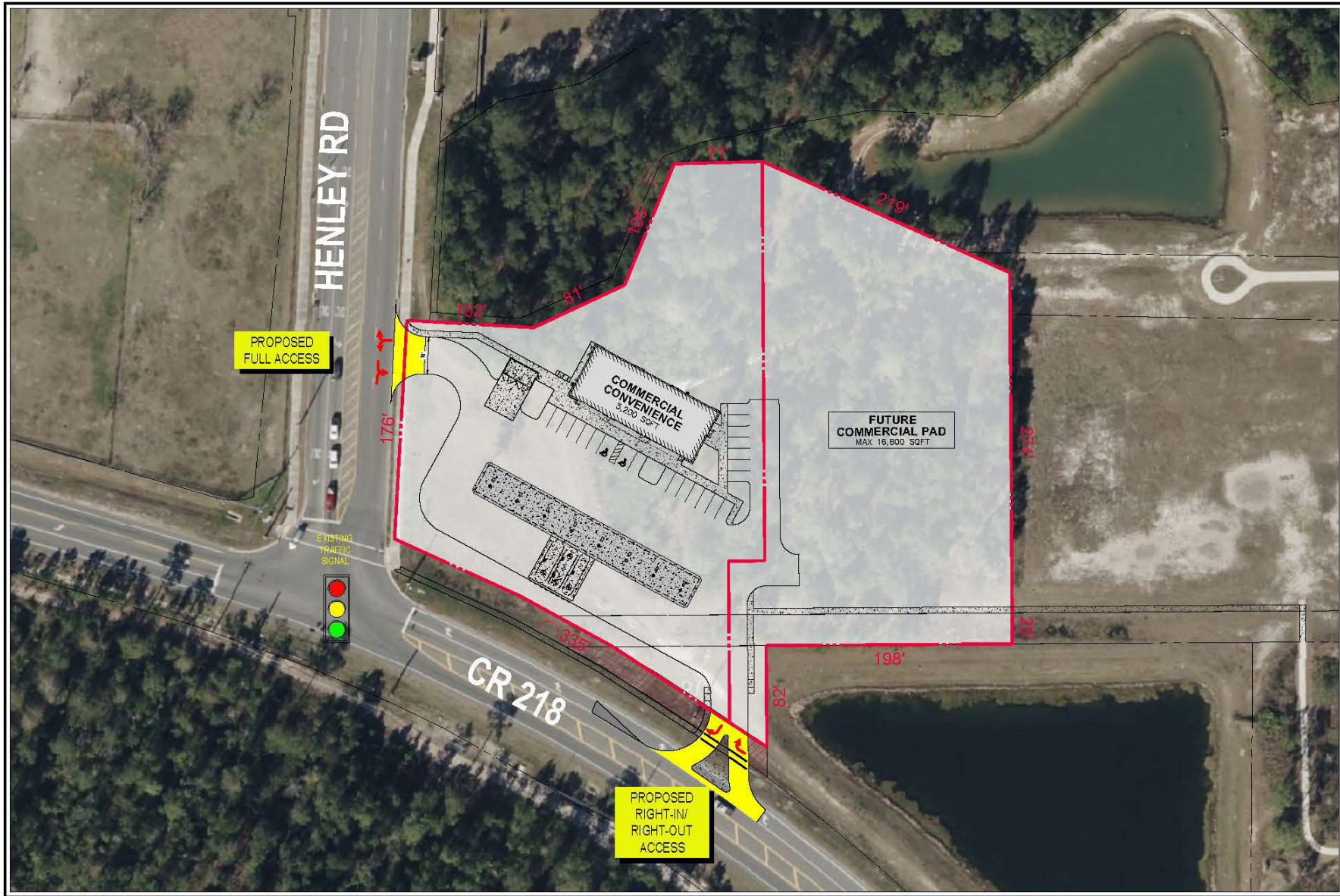


Existing Zoning
Rezoning: PUD 25-0008
from LA RF and PUD to PUD
 Page 15 of 85



Proposed Zoning
Rezoning: PUD 25-0008
LA RF and PUD to PUD





CONCEPTUAL SITE PLAN
 NEC CR 218 & HENLEY RD
 CLAY COUNTY, FL

9/4/2025 | Initials | 2025-08-04 CR 218 & HENLEY, CLAY COUNTY, FL - SITE PLAN

Exhibit "B-2"

PUD Information

	Existing PUD	Proposed PUD
Allowed Uses:	BB-3 zoning district	BA zoning district
Convenience store	Max. 4,000 sq.ft. building	Max. 5,200 sq.ft. building
Retail/commercial/office use	16,800 sq.ft.	(no change)
Gas sales use	2 pump islands with up to 4 (paired) gas pumps (8 pumps total)	8 paired gas pumps (16 pumps total)
Car wash use		Car Wash use added
Restaurant w-alcohol use		Restaurant w-alcohol use added
Retail auto parts sales use		Retail auto parts sales use added
Conditional Uses:		Day Care use added

PUD Information

Setbacks:	Existing PUD	Proposed PUD
Front (west)	40 feet from Henley Road	(no change)
Side (north and south)	25 feet from CR 218 and from wetlands to the north	(no change)
Side (east)	25 foot landscaped buffer to be maintained on the park parcel	A 6 foot vinyl fence shall be installed along the eastern boundary with the park parcel

PUD Information

	Existing PUD	Proposed PUD
Roof	Buildings and island structures shall have pitched roofs.	Gas pump canopy may be a flat roof.
Building facade	Buildings shall have a porch or covered area facing the front of the building.	(no change)
Connectivity	Alley and sidewalks between commercial parcel and residential park.	Limited to one sidewalk connection for safety reasons.

Prior Actions

On October 9, 2025, the Lake Asbury/Penney Farms CAC voted 10-0 to recommend approval of this item with the inclusion of a fence or other separation on the east side next to the residential park.

Recommendations

Staff finds that the criteria for the Rezoning have been met and recommends approval of PUD 25-0008.

Attachment
“B”
COMP-25-0013
PUD-25-0007
Staff

Large Scale Comprehensive Plan Future Land Use Map
Amendment:

COMP 25-0013

Rezoning Application:

PUD 25-0007

Board of County Commissioners
December 9, 2025



Application Information

Applicant: Kimley-Horn & Associates, Inc.

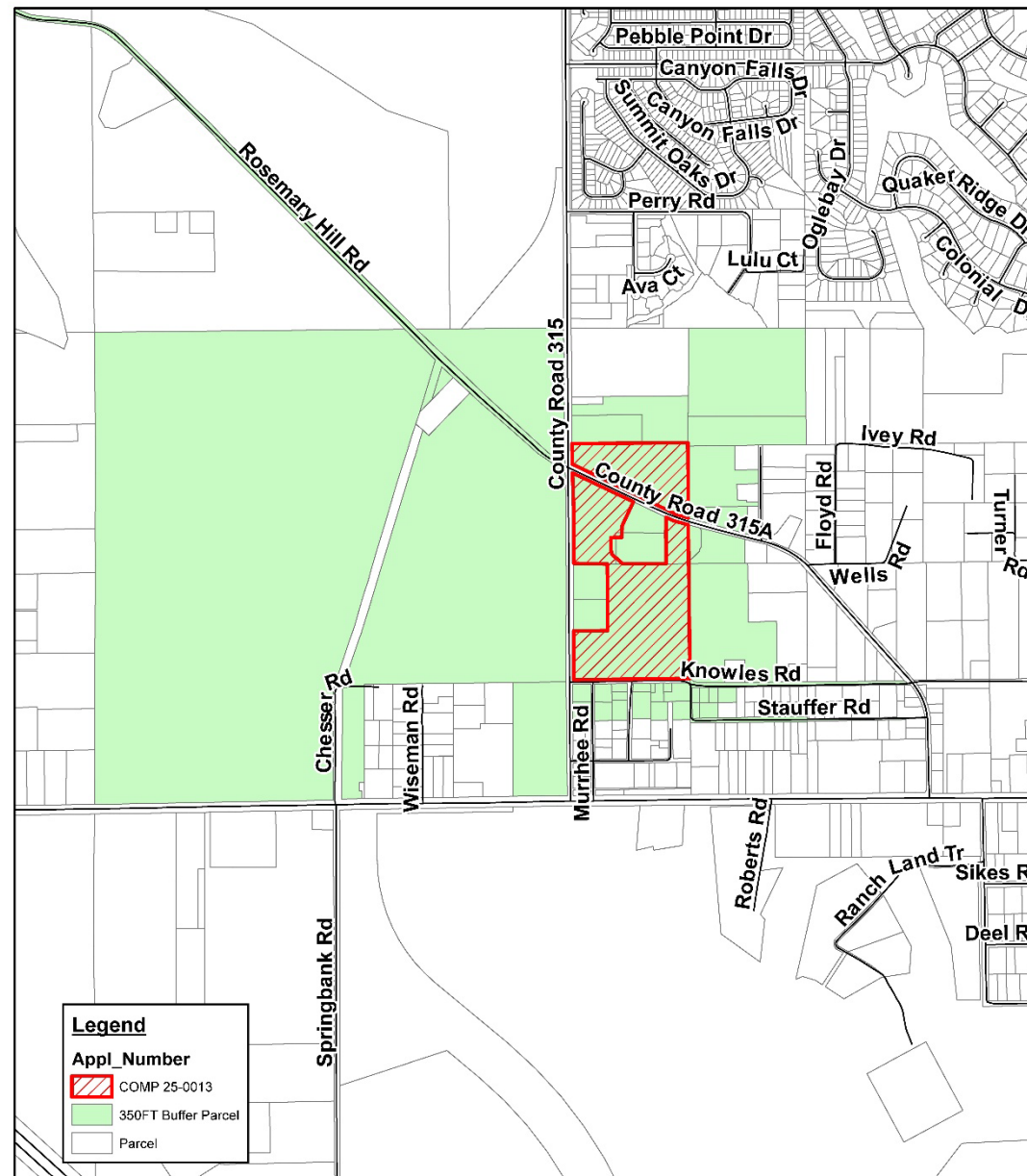
Location: SE corner of CR 315 and CR315A

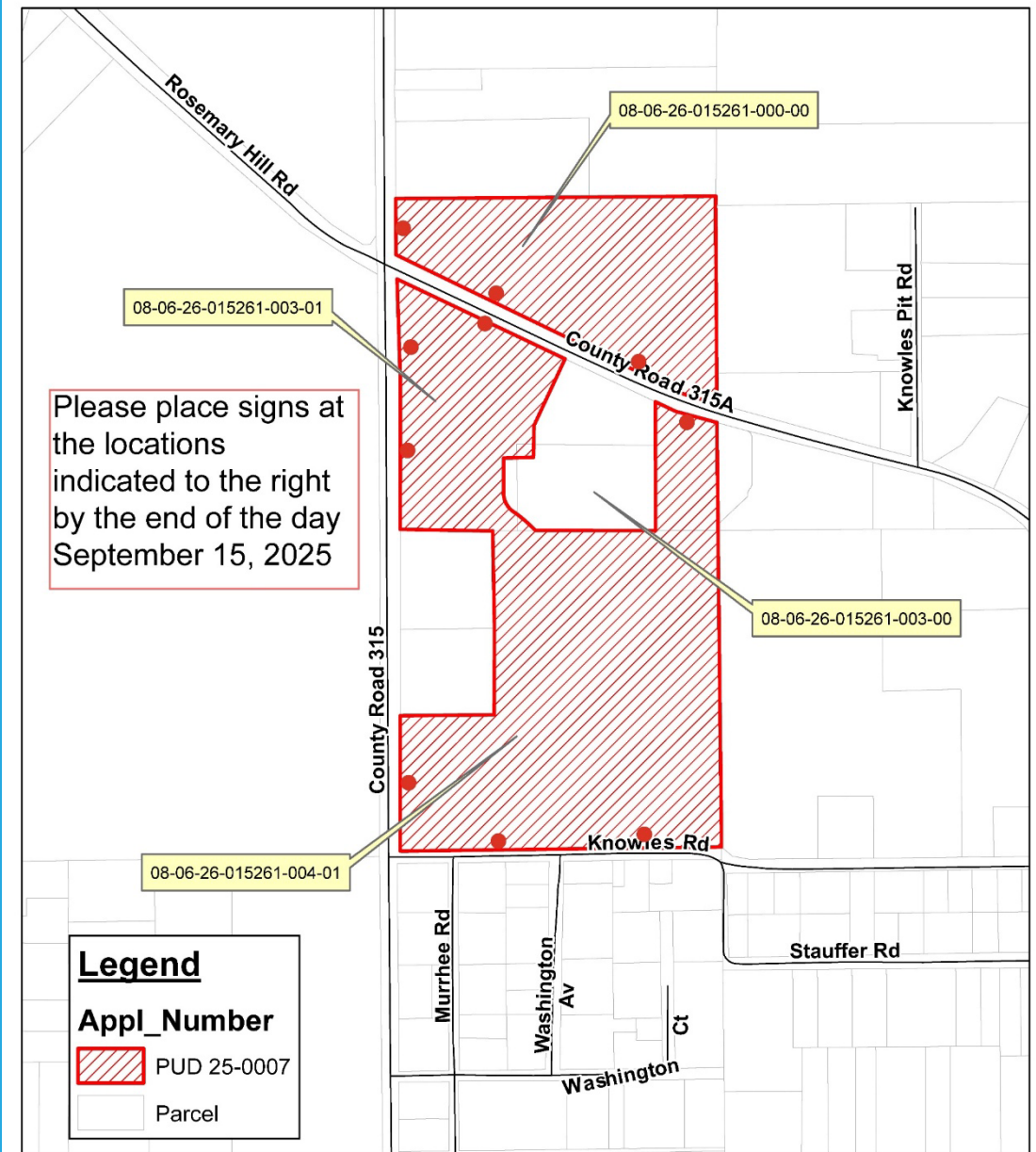
Planning District: Springs District

Commission District: 5 Commissioner Burke

Parcels: 08-06-26-015261-000-00, 08-06-26-015261-003-01,
08-06-26-015261-003-00, and 08-06-26-015261-004-01

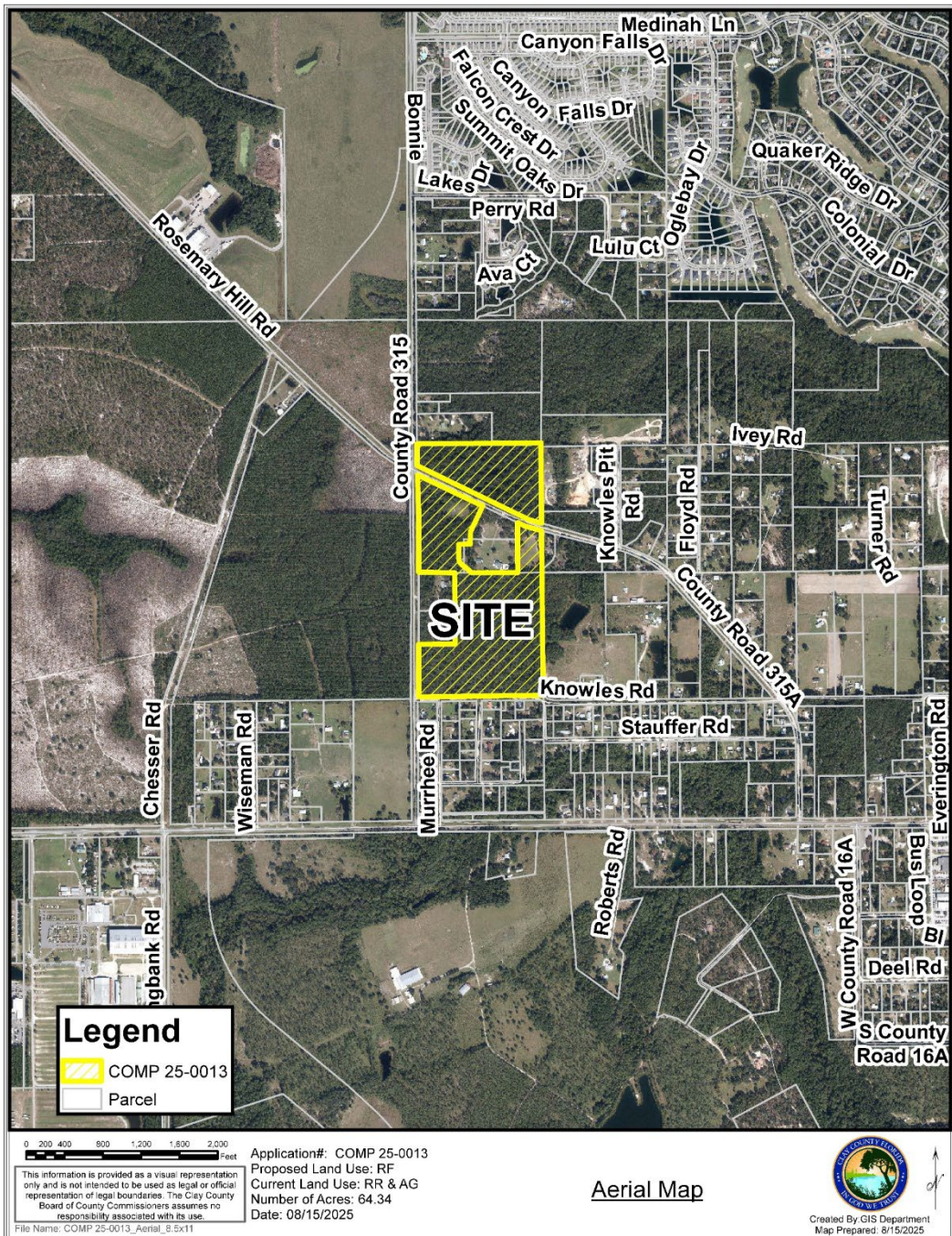
- COMP 24-0026 would change the Future Land Use (FLU) designation from Rural Residential (RR) to Industrial Park (IP).
- PUD 24-0008 would change the zoning from Country Estates District (AR-1) to Planned Industrial Development (PID).

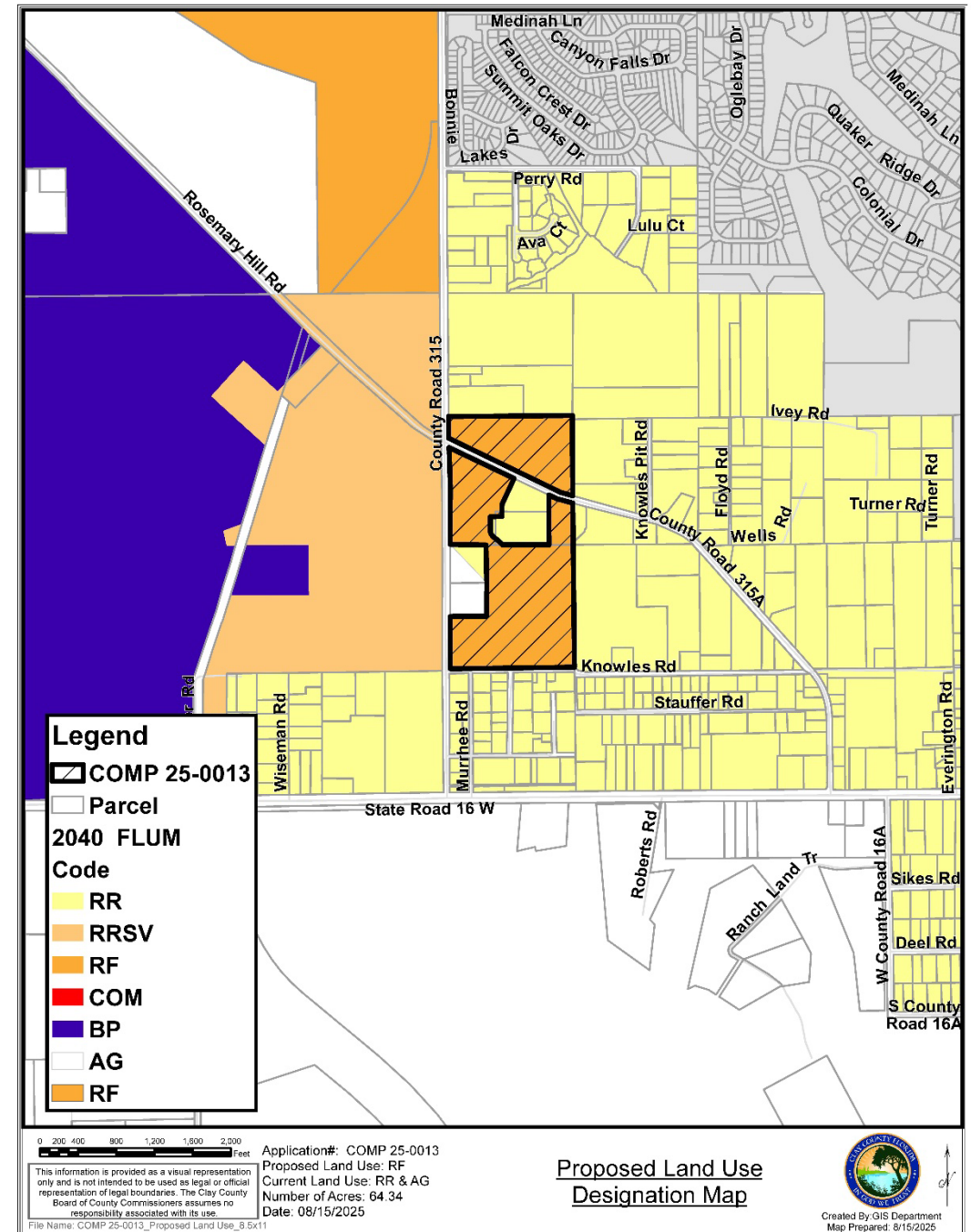
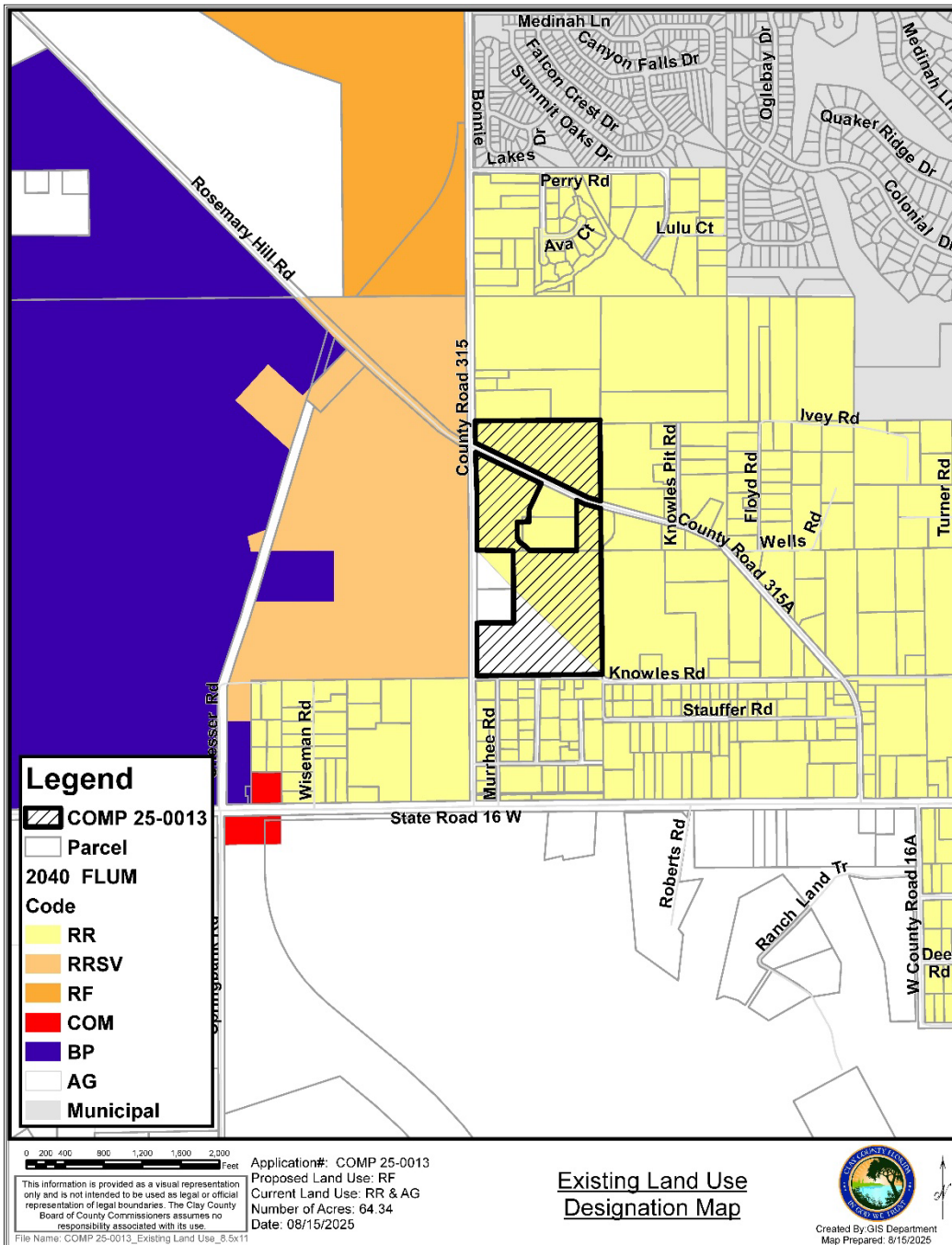


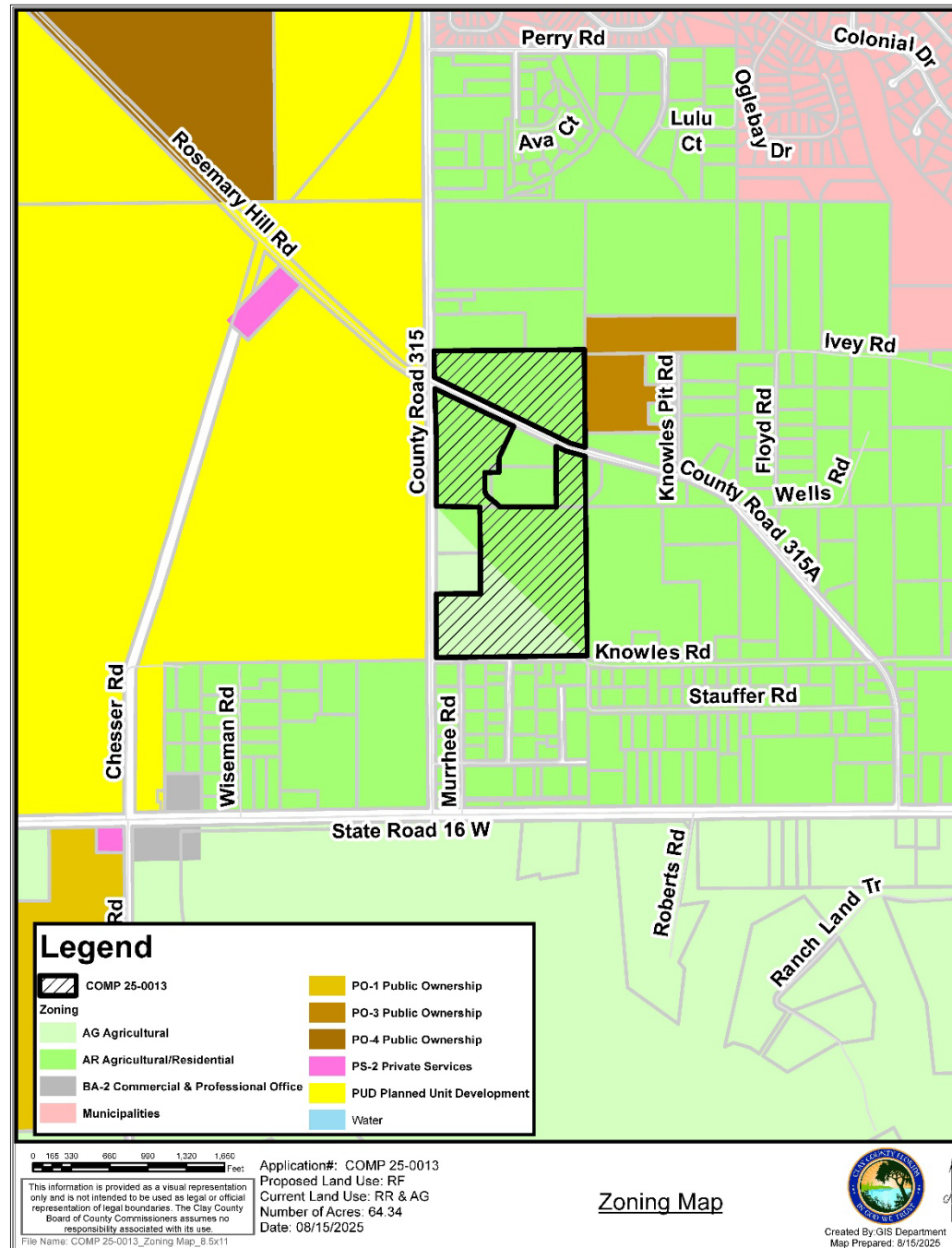


Parcel Location Map
PUD 25-0007









[illegible]

Proposed PUD

Proposed Use: 160 lot single-family home subdivision

Existing vs. Proposed regulations:

Density Allowed

AR Zoning

1 unit/acre

PUD Zoning

3 units/acre

Density Proposed

2.48 units/acre

Minimum Lot Width

100 feet

60 feet

Front Setback

30 feet

25 feet

Rear Setback

35 feet

10 feet

Right of Way Buffer

10 feet

20-30 feet

Recreation/Open Space

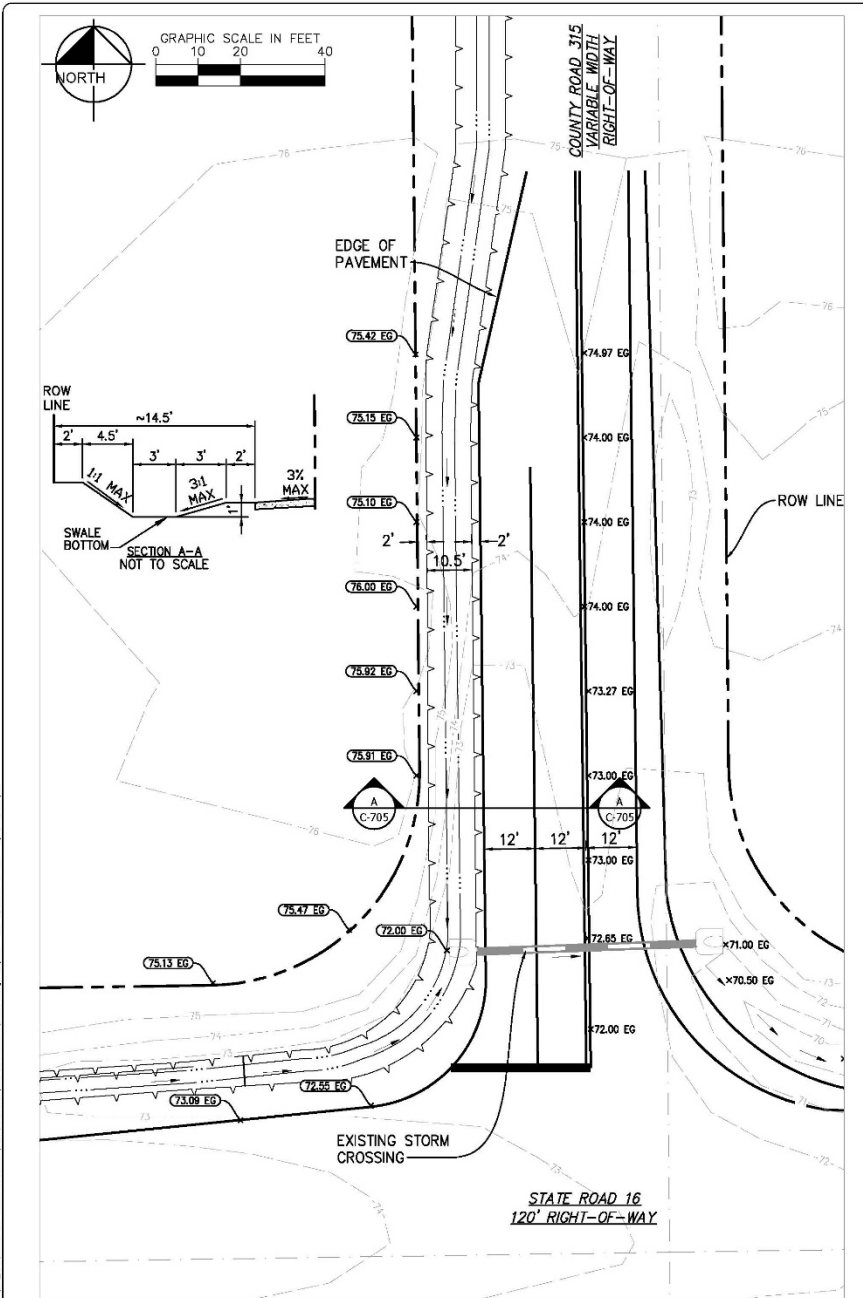
6.4 acres

15 acres

Proposed PUD

Additional improvements:

- The applicant proposes to design and construct a southbound right turn lane on CR 315 for motorists turning west onto Highway 16. A separate exhibit is provided depicting this improvement.
- The applicant proposes to deed a 60-foot-wide portion across the southern portion of the subject property to the County for the continued use of the dirt roadway known as Knowles Road. This is important as at present the portion of Knowles Road from CR 315 to Stauffer Road lies on the applicant's property.
- Visitor Parking not required 28 spaces
- Perimeter Buffer (adjacent to residential) not required 25-30 feet



CR 315 AT SR 16 TURN LANE EXHIBIT

Prior Action

On October 8, 2025, the Springs CAC voted 6-0 to recommend denial of both items.

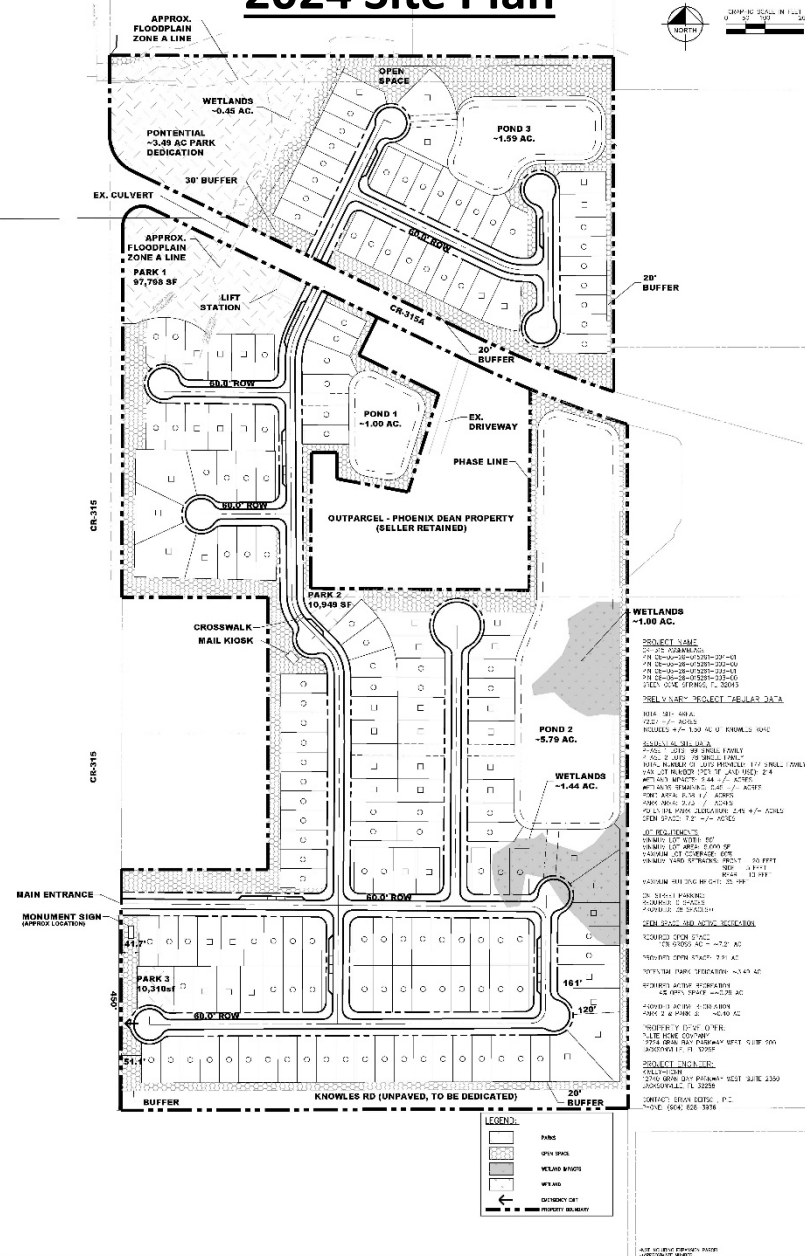
Recommendations

COMP 25-0013

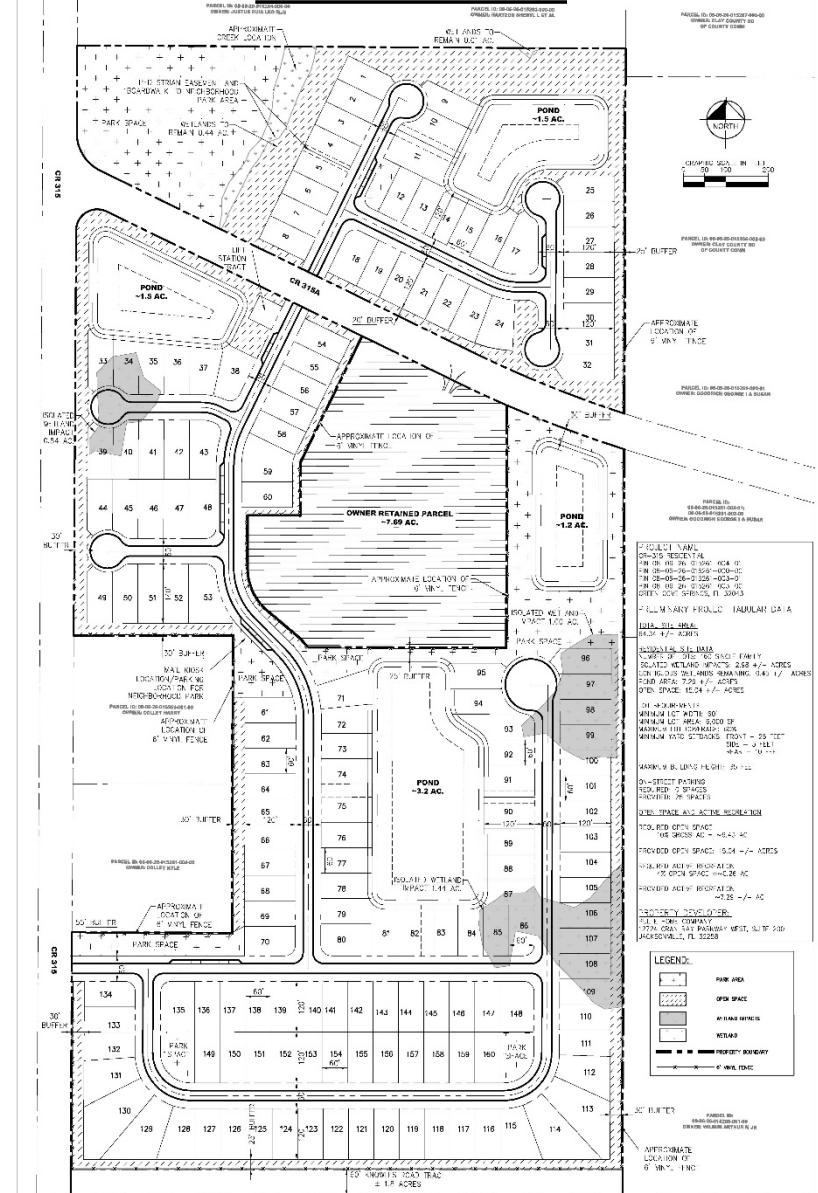
Staff finds that the criteria for the Comprehensive Plan Amendment have been met and recommends approval of COMP 25-0013.

PUD 25-0007

Staff finds that the criteria for the Rezoning have been met and recommends approval of PUD 25-0007.



2025 Site Plan



CR-315 CONCEPTUAL SITE PLAN

Attachment
“C”
Emails – Opposition
COMP-25-0013
PUD-25-0007

From: [Joseph Carter](#)
To: [PlanningandZoning](#)
Subject: 315 315A rezoning
Date: Monday, November 3, 2025 8:33:56 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Stop the madness who's pockets are getting greased the state DOGE needs to visit Clay County

[Yahoo Mail: Search, Organize, Conquer](#)

From: [sharon barnard](#)
To: [PlanningandZoning](#)
Subject: COMP 25-0013 and PUD 25-0007
Date: Monday, November 3, 2025 8:19:43 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am opposed to this change in land use that is on the agenda for Tuesday, November 4. This area is already experiencing non-stabilized growth. The new Willow Springs subdivision and the school on 315 have exponentially increased traffic congestion in the area, and the enormous development off of Cathedral Oaks Parkway hasn't even begun. In addition, 315A runs between Highway 16 and 315 - and the intersection with 16 is about 1/3 mile from Clay High School. The volume of traffic congestion is already unacceptable, and 315A is a frequently used short cut. There was just a fatal accident in front of Clay High a couple of weeks ago. Even now, it takes 20-30 minutes to be able to pull a commercial fishing boat from our property on to Highway 16 at 6 am because of the traffic. We simply do not have the infrastructure in place to continue unbridled growth.

Additionally, and even more dear to my heart as a lifelong resident of Clay County, is the fact that the very section of 315A that is being impacted is a beautiful, quiet, greenspace with gorgeous virgin trees. I have on many occasions seen deer and foxes crossing the road there. It's a short drive that is rich in remembrance of what Green Cove used to be. The temperature drops as you drive down that shady road, and it just feels like home. Please don't let it become another subdivision. To do so would spoil the very thing that is so attractive about Green Cove. Let's don't let this place become another concrete jungle.

Please vote no,

Thank you,
Sharon Barnard
1937 State Rd 16 West
Green Cove Springs, FL 32043

From: [Don Renshaw](#)
To: [PlanningandZoning](#); [Kristen Burke](#)
Subject: No to COMP 25-0013 and PD 25-0007
Date: Monday, November 3, 2025 1:29:21 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I would like to register my opposition to COMP 25-0013 and PUD 25-0007. We need to focus on improving our present infrastructure to properly serve our present citizens not trying to make a large scale comprehensive plan amendment for 20 years from now.

Thank you for your time and consideration,

D.C. Renshaw
2994 Black Creek Drive

From: [Nicole Hayden](#)
To: [PlanningandZoning](#)
Subject: Opposition to Item 2 – PUD/COMP 25-0013 Rezoning & Overdevelopment in Clay County
Date: Monday, November 3, 2025 7:41:27 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Planning Commission Members,

I am writing to respectfully but firmly oppose **Item 2 on the November 4, 2025 agenda** regarding the proposed rezoning (COMP 25-0013 / PUD 25-0007). This development proposal threatens to further erode the rural character, environmental stability, and quality of life that make Clay County so special.

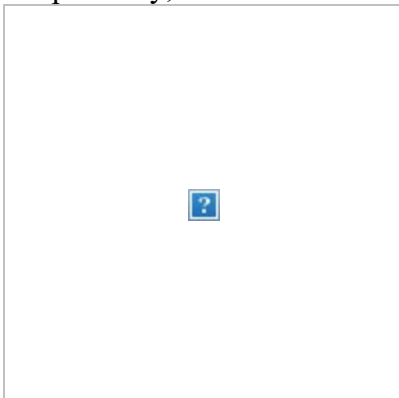
Clay County is already facing the cumulative impacts of unchecked development—our roads, schools, and public services are straining under the pressure of rapid growth. Meanwhile, residents are burdened with **rising taxes to fund infrastructure** that primarily benefits developers.

This proposed project would destroy or degrade sensitive **wetlands, farmlands, and natural habitats** near County Roads 315 and 315A—areas that serve as crucial water recharge zones and wildlife corridors. These lands are not just empty space; they are part of the county’s environmental backbone, filtering stormwater, reducing flooding risk, and supporting local agriculture. Once paved over, they are gone forever.

Clay County’s Comprehensive Plan was intended to ensure **smart, sustainable growth**—not perpetual rezoning that benefits a few at the expense of many. Generational family farms and rural communities are being replaced with dense subdivisions that offer little benefit to long-time residents.

We need the County to take a stand for **responsible stewardship** of our land, water, and community—not more large-scale PUDs that compromise the rural identity and environmental health of Clay County. Please vote **NO** on this rezoning request and protect what remains of our natural and agricultural heritage.

Respectfully,



PUBLIC COMMENT MEMORANDUM IN OPPOSITION

Re: COMP 25-0013 (Large-Scale FLUM Amendment) & **PUD 25-0007**
(Rezoning to PUD)

Hearing: Clay County Planning Commission – November 4, 2025, 5:00 p.m.

Submitted by: William G. Merryman, Protect Florida Waters (1117 Buggy Whip
Trl, Middleburg, FL 32068; billgmerryan@gmail.com; 904-859-9149)

Note: This memorandum is meant for the sole use of advocating for Clay County residents who will likely be adversely affected by the proposed development. Nothing in this memorandum may be construed as legal advice. The contents of this memorandum must be reviewed by a qualified attorney before actioned upon.

Brief Summary

The companion applications would (1) change ±64.31–64.34 acres at/near CR 315 & CR 315A from RR/AG → RF to enable a 160-lot single-family subdivision and (2) rezone the same area from AR/AG → PUD for up to 160 detached homes. The record shows material increases in traffic, new access points on CR 315 and two on CR 315A, an unfunded off-site turn lane the applicant proposes to build in Phase 1, wetlands impacts, and a reliance on later concurrency and permitting to solve core issues. (Agenda packet, PC Staff Reports and PUD Written Description, pp. 97–121.)

Request

Please DENY COMP 25-0013 and PUD 25-0007. The record does not contain sufficient supporting data and analysis to justify the FLUM change and the rezoning at this time (transportation operations, school capacity, utilities, drainage, and compatibility). If the Commission declines to deny, we request a continuance to allow the applicant and staff to supply the required analyses and objective mitigation conditions.

Bullet-Point Grounds for Denial/Challenge

- Adverse impacts to current residents (traffic & safety).
 - 160 units generate ~155 PM-peak trips; new access on CR 315 plus two access points on CR 315A; off-site turn lane at CR 315/SR 16 is unfunded by the County until $\geq$ FY2034 and is only proposed by the applicant without operational analysis in this record.
 - Sidewalks are deferred to later design; neighborhood cut-through and queuing at multiple driveways are not analyzed.
- Environmental & infrastructure risk (wetlands, stormwater, utilities).
 - Packet acknowledges wetlands preservation and impacts and defers stormwater design to SJRWMD permitting; no downstream capacity or outfall analysis is in this record.

- Wastewater noted to be served by Peter’s Creek WWTP (1.5 MGD), but no allocation letter or capacity assurance is included.
- Potential noncompliance unless conditioned (Florida statute requirements).
 - Large-scale plan amendments must be supported by “supporting data and analysis” and be internally consistent; this record relies on conclusory statements and future reviews.
 - A rezoning/development order must be consistent with the *current* comprehensive plan; any approval contingent on a future FLUM change must be expressly conditioned on the amendment becoming effective and backed by competent substantial evidence now (traffic operations, concurrency, compatibility).
 - School concurrency must be satisfied with proportionate, binding mitigation before approvals dependent on capacity.

Narrative Support (with agenda pins for the record)

1) Adverse Impacts to Current Residents – Traffic & Safety

- Scale and trips. The staff/application materials state 160 SFD units and identify ~150–155 PM-peak trips using ITE 210. (Agenda Staff Report, COMP 25-0013; PUD application narrative.)
- Site access pattern. The PUD Written Description commits to one access on CR 315 and two on CR 315A (serving north and south “pods”), with locations

subject to later administrative modification. No intersection level-of-service, turn movement counts, sight-distance studies, or queuing analyses are in the packet for these new driveways.

- Off-site turn lane at CR 315/SR 16. The packet confirms the improvement is on the County CIP but unfunded until at least FY2034; the applicant proposes to build the turn lane in Phase 1. However, the record contains no operational analysis demonstrating that this single improvement resolves safety/operations for the added driveways and CR 315A frontage or the SR 16 junction during build-out.
- Sidewalks & non-motorized safety. Sidewalks “throughout the development and along CR-315A” are listed as requirements to be handled per LDC §8-14 at later design; there is no corridor-level connectivity plan in the packet tying on-site walks to safe crossings, schools, or parks.

Result: Without driveway operations, queuing, and crash-pattern analysis, the record does not provide the supporting data and analysis required to conclude the changes are safe and compatible.

2) Environmental & Infrastructure Risk – Wetlands, Stormwater, Utilities

- Wetlands & impacts. The PUD narrative indicates ± 0.45 acres of wetlands preserved and ± 2.98 acres of isolated wetlands impacted, with compliance deferred to SJRWMD/ACOE permitting. The packet lacks downstream system capacity or outfall analysis and does not quantify post- vs pre-development peak discharge or water-quality treatment objectives.
- Stormwater. The materials state only that the project “will follow SJRWMD permitting”; there is no preliminary basin model, tailwater condition, or attenuation summary in the agenda packet to evaluate neighborhood flood risk.
- Utilities. Wastewater service is identified as Peter’s Creek WWTP (1.5 MGD) and “utilities are available,” but no CCUA will-serve/capacity letter appears in the packet to demonstrate firm capacity for 160 homes.

Result: Environmental and infrastructure findings are deferred rather than demonstrated, which is inadequate for approving a large-scale FLUM change and rezoning with neighborhood-level impacts.

3) Legal Standards – Where This Record Falls Short (Florida Law)

- Supporting data & internal consistency (Comprehensive Plan). Large-scale amendments and plans must be adopted/transmitted with the supporting data and analysis and must remain internally consistent. The current packet relies

on conclusory statements and future reviews rather than present, objective analyses.

- Rezoning must be consistent with the current plan. A development order/rezoning must be consistent with the comprehensive plan as it exists today; if the PUD depends on the RF FLUM category, approval must, at minimum, be expressly conditioned on the amendment's effective date and supported by competent substantial evidence now on transportation, schools, utilities, drainage, and compatibility.
- School concurrency and proportionate mitigation. Where school concurrency is in effect, sufficiency may be shown by a binding, proportionate mitigation commitment; none appears in this packet for 160 new dwellings.

Result: On this record, denial (or continuance) is warranted to avoid an approval that is unsupported by the required data/analysis and that risks inconsistency with state law.

Closing & Explicit Ask

For the reasons above, the Planning Commission should deny COMP 25-0013 and PUD 25-0007. The record as submitted does not provide the present-tense supporting data and analysis to ensure safe operations on CR 315/CR 315A, protect

neighboring residents from drainage and compatibility harms, or demonstrate concurrency compliance. If the Commission is unwilling to deny at this time, we request a continuance to obtain: (1) full traffic operations studies (driveway/SR-16 turn lane performance, queuing, crash history), (2) downstream stormwater/outfall modeling and proposed attenuation/treatment, (3) CCUA written capacity/availability, and (4) school concurrency documentation with any proportionate mitigation.

Accordingly, please vote to DENY COMP 25-0013 and PUD 25-0007.

Pinpoint References (Agenda Packet)

(for staff and Commission convenience; page numbers reflect the Nov. 4, 2025 Planning Commission agenda PDF)

- Hearing notice & attachments list for COMP 25-0013/PUD 25-0007: Agenda, pp. 70–73.
- COMP 25-0013 Staff Report: parcels, location, unit count, intensity table and trip generation (~150 PM trips): Agenda, pp. 72–79.
- PUD 25-0007 Written Description: acreage (~64.34 ac), **160 SFD units**, access locations (**CR 315** and **two CR 315A**), sidewalks per LDC, buffers

(Type A), wetlands/impacts, utilities (Peter's Creek WWTP), and phasing; Traffic Impact Analysis and **turn lane unfunded until ≥FY2034; Phase 1** construction commitment: Agenda, pp. 111–121.

- Turn Lane Exhibit (CR 315 at SR 16): Agenda, pp. 120–121.

Note: This memorandum is meant for the sole use of advocating for Clay County residents who will likely be adversely affected by the proposed development. Nothing in this memorandum may be construed as legal advice. The contents of this memorandum must be reviewed by a qualified attorney before actioned upon.

(End of memorandum)

From: [Bill Merryman](#)
To: [PlanningandZoning](#)
Subject: Written Public Comment for Record – COMP 25-0013 & PUD 25-0007 – Planning Commission Hearing November 4, 2025
Date: Monday, November 3, 2025 8:20:29 AM
Attachments: [Opposition to COMP 25_0013 PUD 25_0007.pdf](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Planning Staff,

Please find enclosed my Public Comment Memorandum in Opposition to COMP 25-0013 and PUD 25-0007. I respectfully request that it be distributed to the Planning Commission and included in the official record for the November 4, 2025 agenda.

In summary, and as detailed in the memorandum, I urge the Planning Commission to DENY both applications because the record presently lacks the supporting data and analysis necessary to ensure safe roadway operations and neighborhood compatibility, and it defers essential findings on traffic, school concurrency, utilities, and stormwater to later stages.

Thank you for your attention. Please confirm receipt and distribution.

Sincerely,

William G. Merryman
1117 Buggy Whip Trl
Middleburg, Florida 32068
billgmerrya@gmail.com | 904-859-9149
Protect Florida Waters

Attachment: Public Comment Memorandum in Opposition – COMP 25-0013 & PUD 25-0007 (Planning Commission Nov. 4, 2025)

Attachment
“D”
COMP-25-0013
PUD-25-0007
Applicant



CR 315 Residential

(CPA 2025-0013)
(PUD 25-0007)

Clay County Planning
Commission
November 4, 2025



Project Team

Kimley Horn & Associates Planning	Kimley-Horn and Associates Civil Engineering/Transportation	Pulte Homes Project Builder
Mark Shelton, AICP Senior Urban Planner	Bill Schilling, P.E. Civil Engineer / Transportation Planner	Garrett Queener Land Planning & Entitlements Manager

Existing + Proposed Land Use

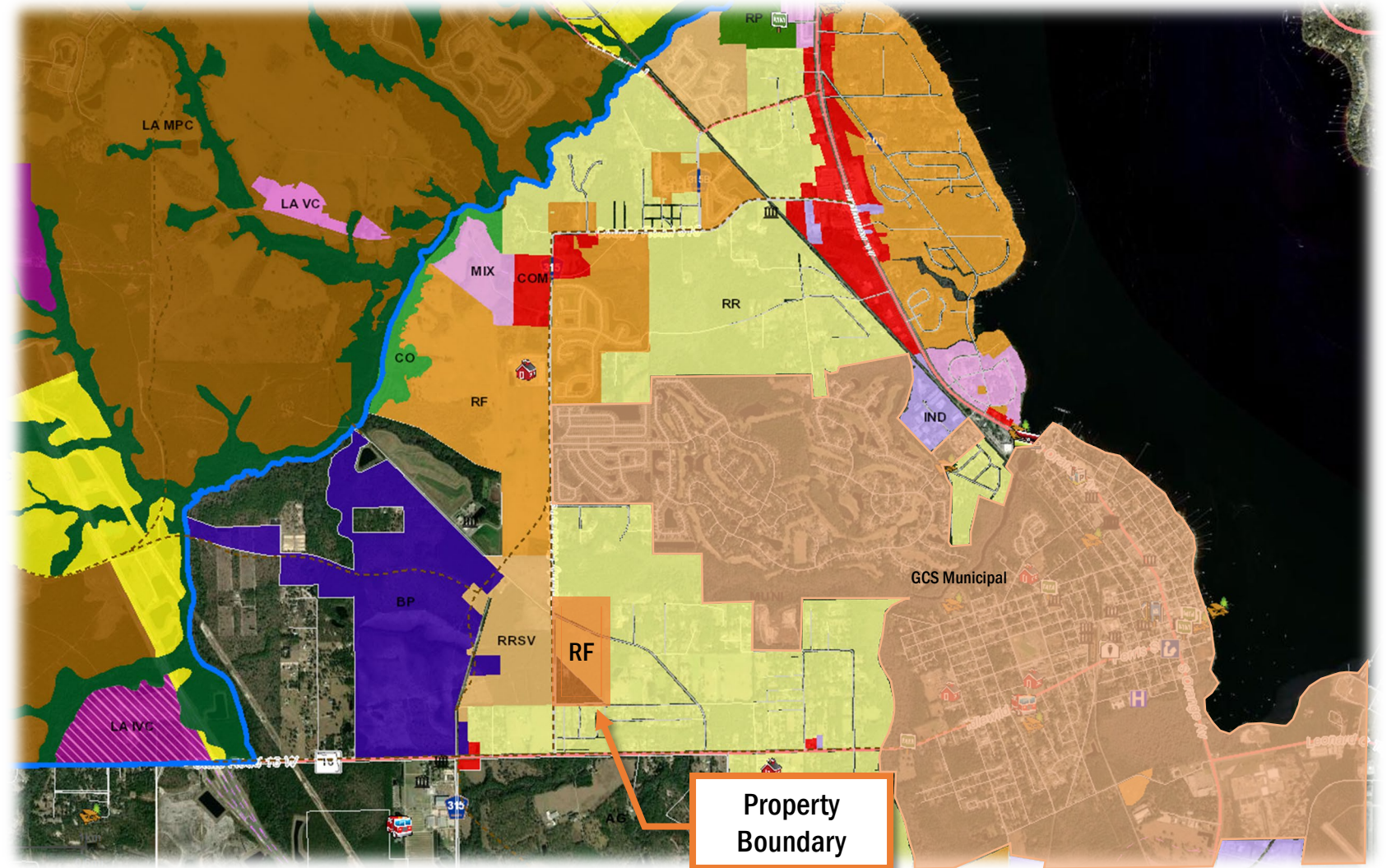
Property Size: +/- 64.3 acres

Existing Land Use Category:

- Rural Residential (RR) (48.4 ac)
- Agriculture (AG) (15.9 ac)

Proposed Land Use Category:

- Rural Fringe (RF)



Existing + Proposed Zoning

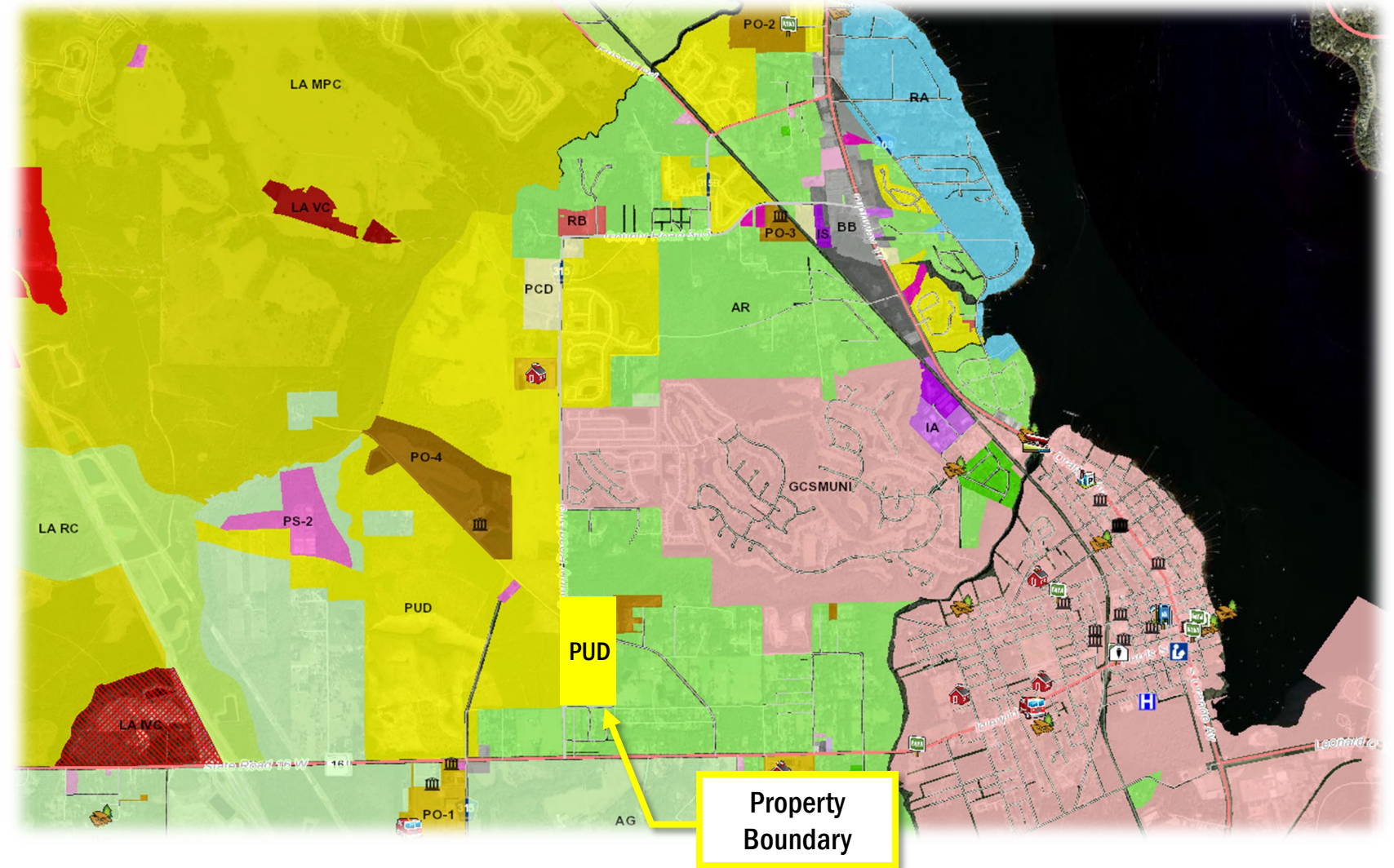
Property Size: +/- 64.3 acres

Existing Zoning Category:

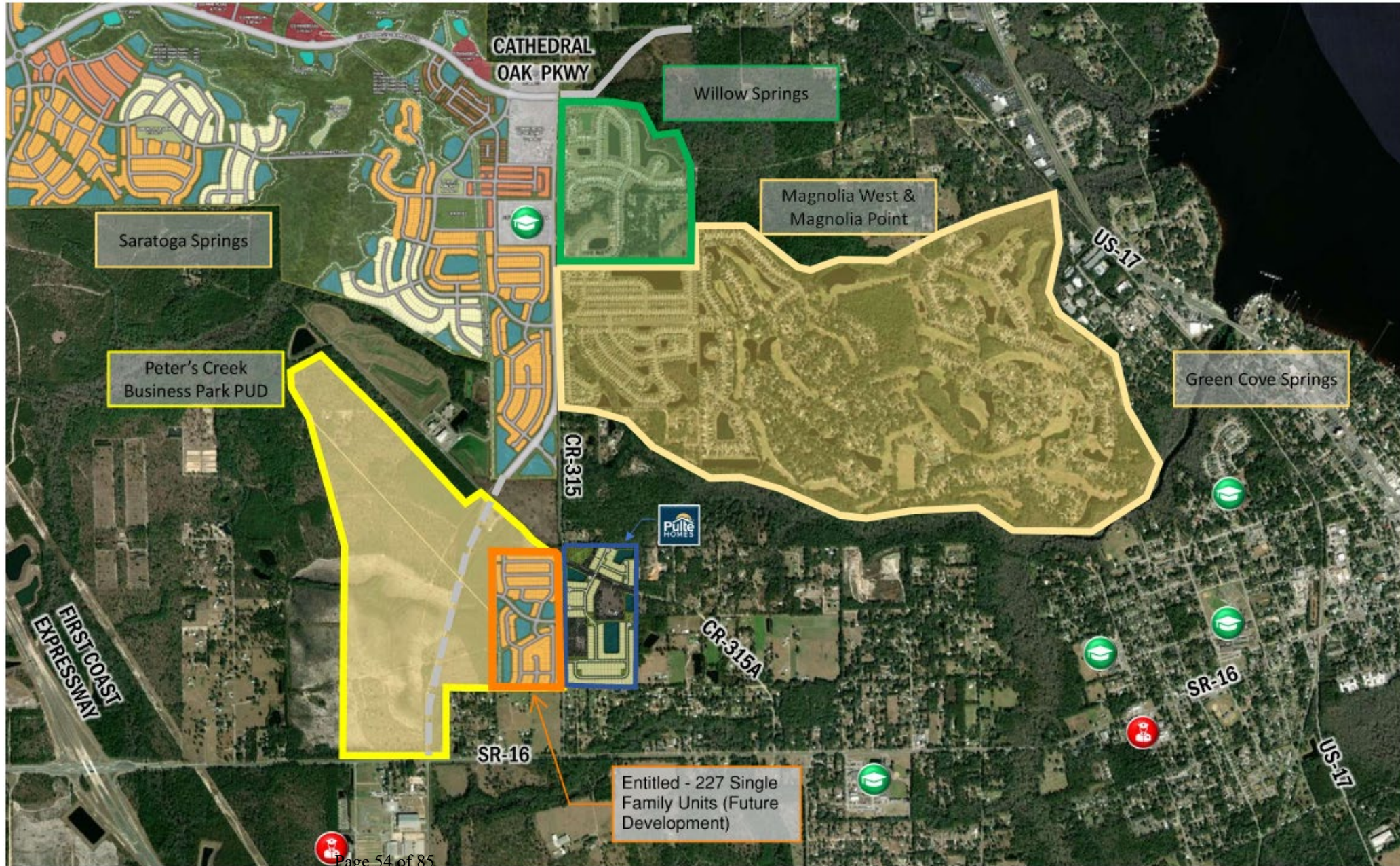
- Agriculture Res. (AR) (48.4 ac)
- Agriculture (AG) (15.9 ac)

Proposed Zoning Category:

- Planned Unit Dev. (PUD)



Site Location



Community Outreach

- Pulte Homes conducted extensive community outreach between March and June of 2025 prior to refile applications.
- Communicated and requested feedback from neighbors via:
 - Email
 - Text
 - Phone
 - In person meetings
 - Community Open House
 - June 30, 2025



March 31, 2025

Dear Mr. and Mrs. Goodrich,

My name is Garrett Queener, and I am a project manager for Pulte Homes, and took over a project known as "Goodrich Estates" at the end of last year.

I understand that you own property located at **3776 County Road 315A** adjacent to the previously proposed development. I also understand as part of the previous zoning request; you may have offered commentary regarding the proposed development of the property which borders yours. Pulte maintains a desire to work with the neighboring property owners to allow them to sell their property, and for the property to be developed.

As part of my efforts in taking a fresh look at this project, I would appreciate the opportunity to meet you in person and discuss your comments, questions, and concerns associated with development near your property. I am happy to meet you at your property, or somewhere convenient for you to discuss these items and simply try to bring the decent humanity I was raised with to a situation that I recognize can be emotional for everyone involved. I do genuinely value the concerns folks have regarding new development and would sincerely appreciate the opportunity to review the details of this project together with you.

For convenience, I have delivered this same inquiry to the email address I obtained through public records from the previous zoning proposal. Please feel free to let me know what meeting times may be convenient for you and I will make myself available. You can reach me at garrett.queener@pulte.com, or at my cell phone [REDACTED] I look forward to speaking with you soon.

Sincerely,

Garrett Queener
Manager of Land Planning and Entitlements
Pulte Homes – Northeast Florida

Plan Revisions

Old Plan

Development/Property Size

- *Total Project Size: **72.1 Acres***
- *Open Space/Park Area: **7.2 Acres (10%)***
- *Active Recreation: **0.4 Acres***

Lot Count/Size

- *Max Lot Count: **214 Units (3.0 units/acre)***
- *Minimum Lot Width: **50'***

Buffers

- *Width: **10/20 feet***
- *Screening: **Minimum Plantings***

Offsite Infrastructure

- ***\$300k cash funding** of right turn lane at CR 315/SR-16*

New Plan

Development/Property Size

- *Total Project Size: **64.3 Acres***
- *Open Space/Park Area: **15.0 Acres (23%)***
- *Active Recreation: **7.29 Acres***

Lot Count/Size

- *Max Lot Count: **160 Units (2.5 units/acre)***
- *Minimum Lot Width: **60'***

Buffers

- *Width: **20/30 feet***
- *Screening: **Fencing/Type A Screening***

Offsite Infrastructure

- ***Up front construction** of right turn lane at CR 315/SR-16*

Plan Revisions

Old Plan



Page 57 of 85

New Plan



Site Plan and Compatibility

Plan Details

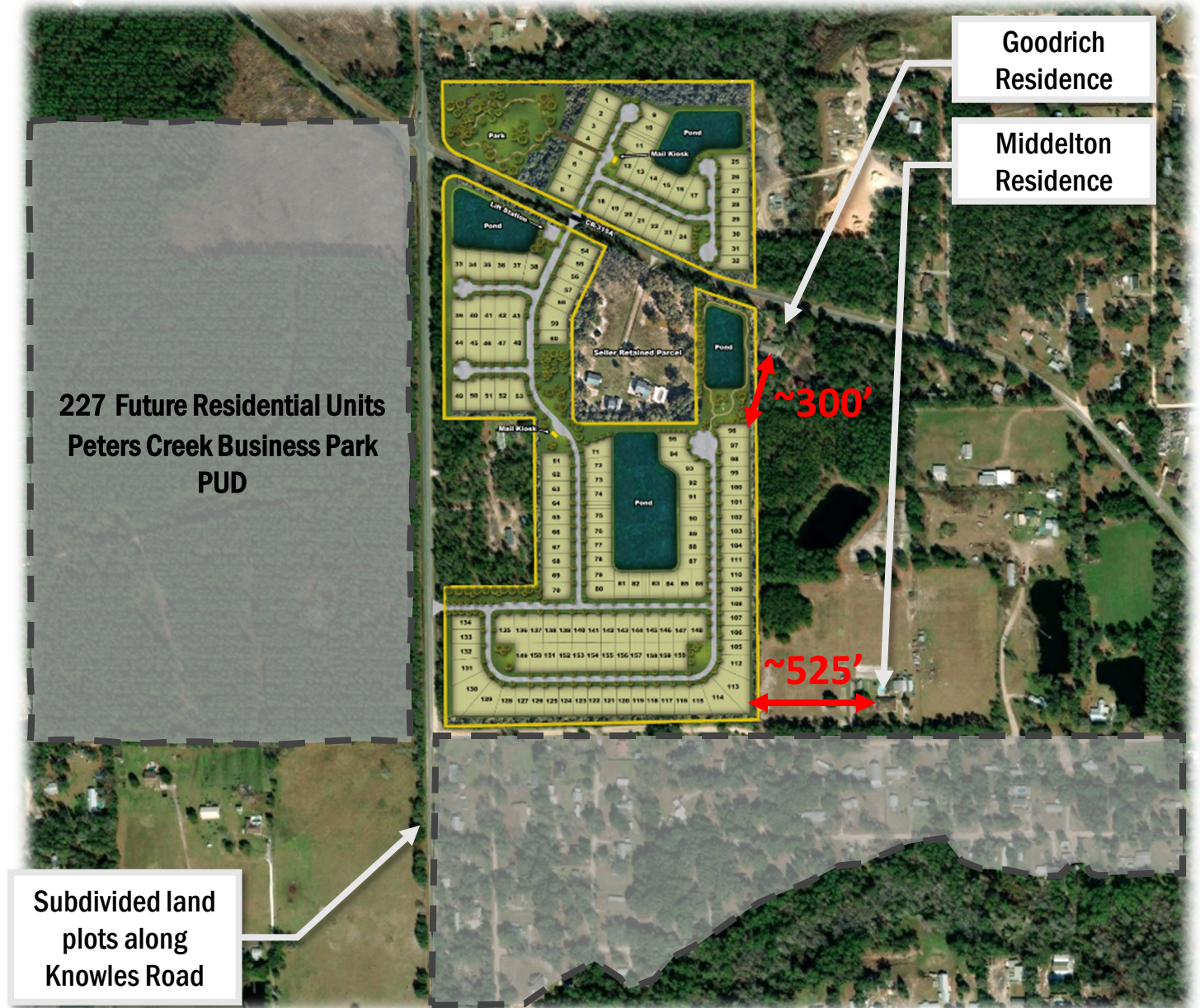
- Maximum 160 Homes
- Lot Widths – 60'

Residential Density

- Rural Fringe max: 3 units/ac
- Proposed: 2.5 units/ac

Open Space & Recreation

- 2 large community parks
- Common and Open Areas **(23%) site**
- 30' perimeter buffer adjacent residences



Infrastructure Improvements

1. Cathedral Oaks Parkway

3.3-mile divided 2-lane road w/sidewalk and bike lanes, connects SR-17/Green Cove Springs to FCE (**\$43.2M**)

2. First Coast Expressway

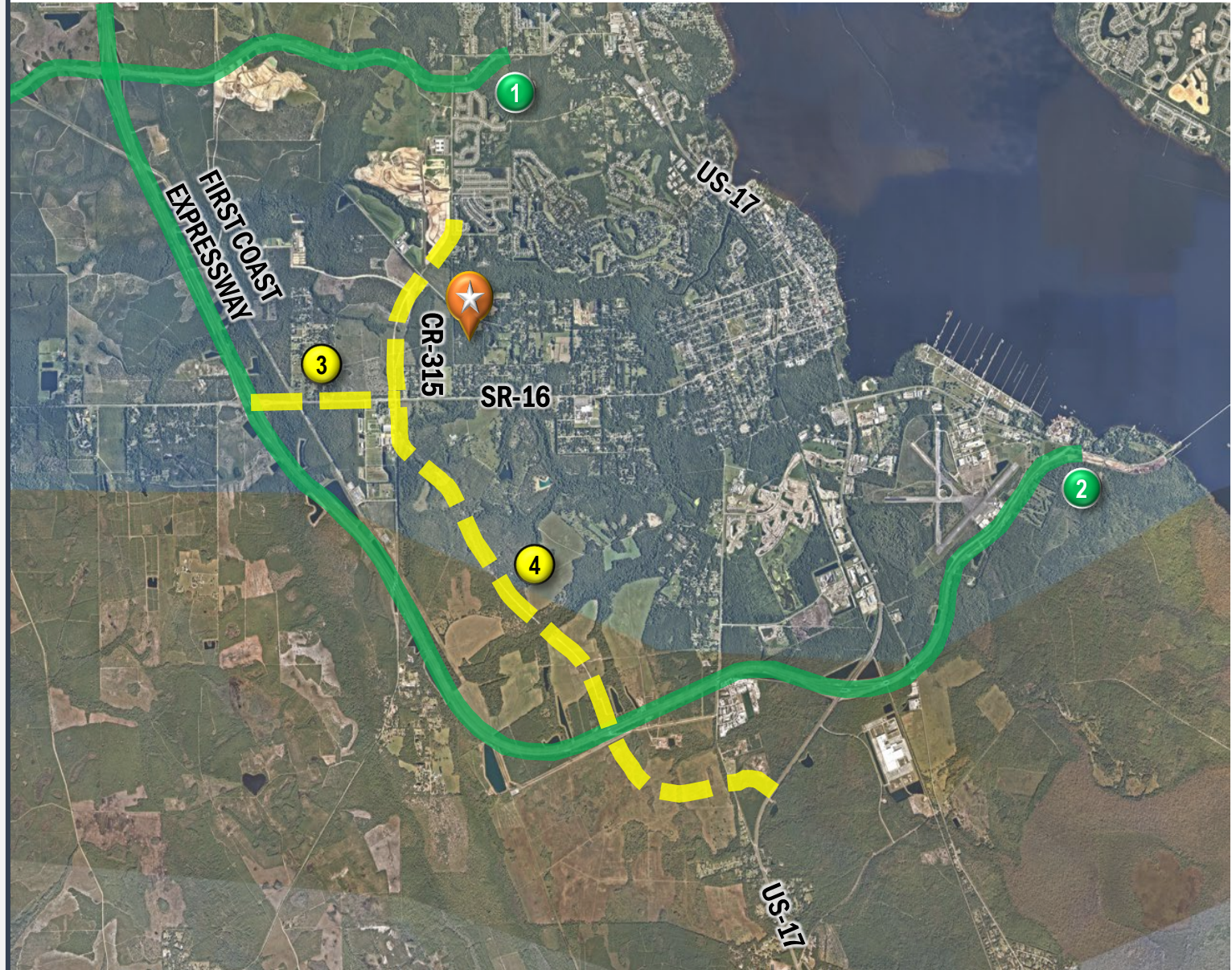
46-mile multilane expressway increases connectivity to Duval and St. Johns county, adds major transportation capacity to region, driving job and population growth. (**\$2B**)

3. SR-16 Widening

Expanding SR-16 to a 4-lane section from FCE to Fairgrounds, currently in design as priority project

4. Clay Dairy Pkwy (315 Realignment)

Green Cove springs bypass to access current and future developments, significantly reducing traffic on CR 315 and SR-17.

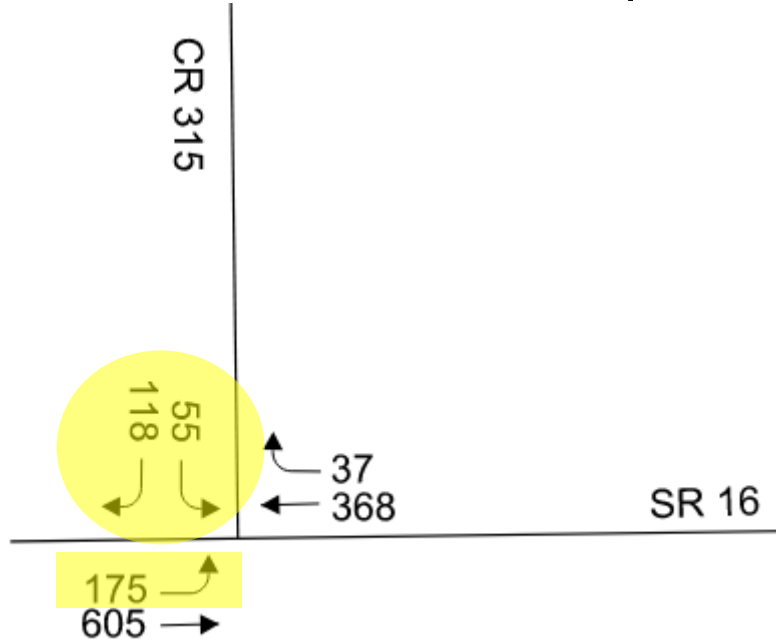


CR 315 at SR 16 Intersection – AM Peak Hour

- Since opening of First Coast Expwy and Cathedral Oaks Pkwy, intersection has seen a significant trip reduction
- SB AM Peak hour trips have reduced by ~36%
- EB Left AM Peak Hour trips have reduced by ~57%

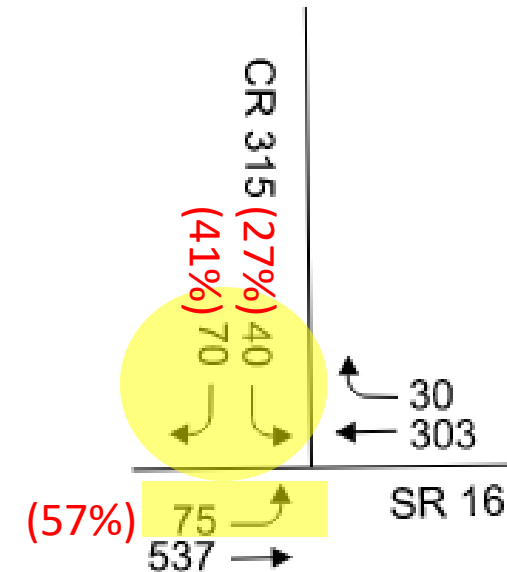
Fall 2024 Data

173 AM Peak Hour SB Trips



Fall 2025 Data

110 AM Peak Hour SB Trips

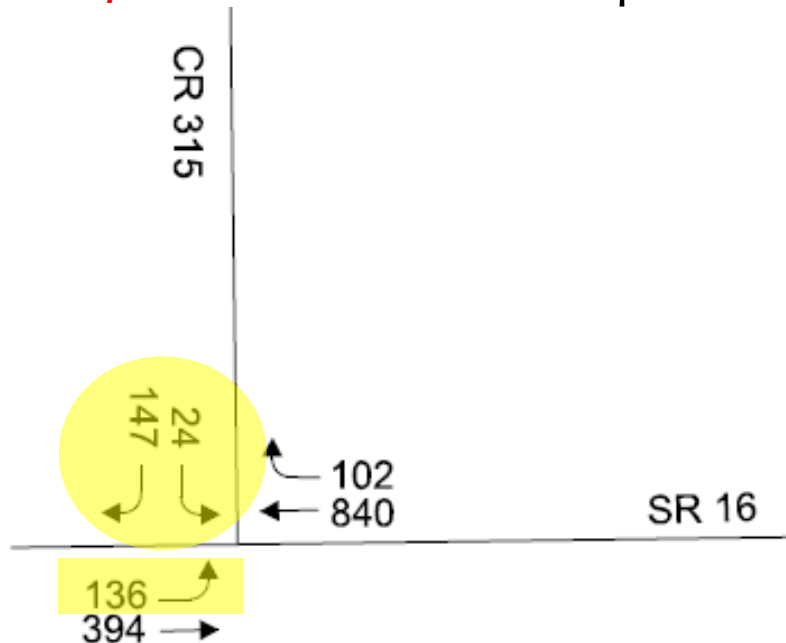


CR 315 at SR 16 Intersection – PM Peak Hour

- Since opening of First Coast Expwy and Cathedral Oaks Pkwy, intersection has seen a significant trip reduction
- SB PM Peak hour trips have reduced by ~19%
- EB Left PM Peak Hour trips have reduced by ~33%

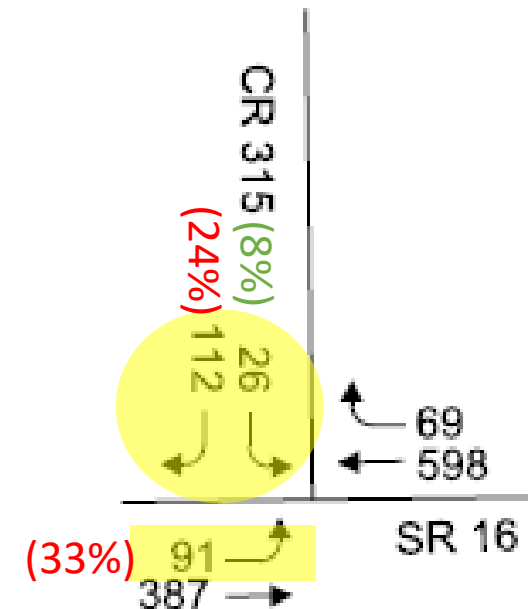
Fall 2024 Data

171 PM Peak Hour SB Trips



Fall 2025 Data

138 PM Peak Hour SB Trips

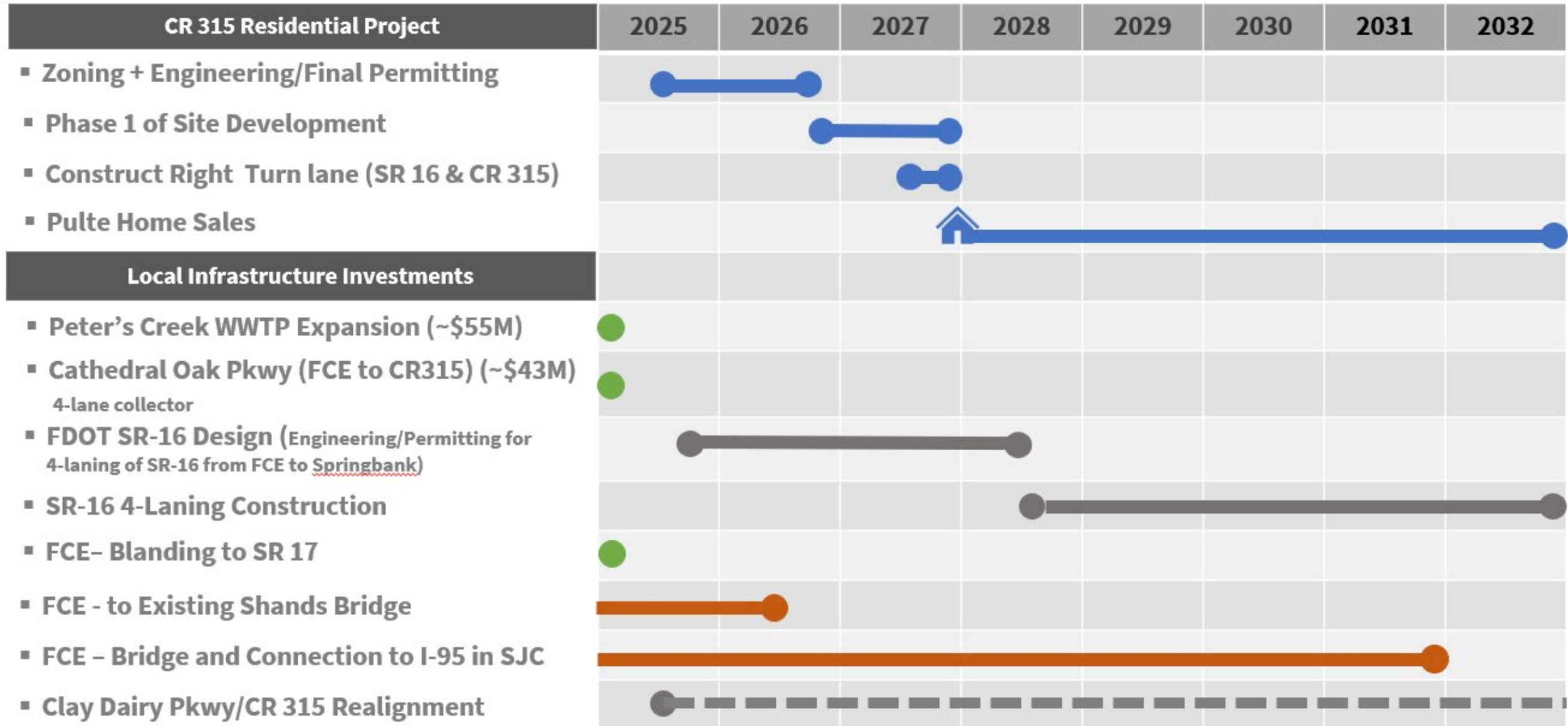


CR 315 and SR 16 – Intersection

- FDOT recommends ***“The county consider constructing a right turn lane on SB CR 315 at SR 16.”***
- Clay County added same right turn lane to the Capital Improvement Plan, project is without funding.
- Pulte will fund and construct turn lane with development
- Traffic counts collected by FDOT and Kimley-Horn identifies that **~70%+ of SB vehicles at the intersection take a right turn onto SR-16 westbound.**
- Traffic counts collected after opening of Cathedral Oaks Pkwy and First Coast Expressway already show a **significant reduction in SB traffic at intersection of 315 and 16**
- **Construction of turn lane significantly reduces delay** for majority of SB drivers on County Road 315.



Infrastructure Improvements





SCHOOL BOARD CONCURRENCY RESERVATION LETTER (SCRL)

Project Name: Goodrich Estates (177 sf)

Property Address: Parcel: 015261-000-00, 015261-003-00, 015261-004-01, C3725 and 3750 CR 315 A, GCS, FL 32043

Owner/Developer: Kimley Horn and Associates, 12740 Gran Bay Pkwy, Ste. 2350 Jax, FL 32258
Blair Knighting

Clay County CRC number: SCRC # 2024000006

Dwelling Type	Dwelling units	Impact Fee	Impact Fee extended	Student Generation Rate: Ed Fac Plan 2023-2028			
Single Family	177	\$7,913	\$515,601	0.256	0.081	0.158	
Multi Family		\$3,629	\$1,324,585	0.105	0.021	0.063	

SCHOOL CONCURRENCY SERVICE AREAS (SCSA) ANALYSIS

School	School Capacity (FISH)	LOS Capacity (110%)	Students Enrolled (Oct. 23)	Reserved Plus Contiguous Service Area	Available Capacity	Project's Impact	Seats to Mitigate	Bus required
Spring Park ES	859	945	673	616	N	46	46	Y
Green Cove JH	930	1023	790	281	N	15	15	Y
Clay HS	1935	2129	1709	706	N	28	28	Y

CONTIGUOUS SCHOOL CONCURRENCY SERVICE AREA (CSCSA)

School	School Capacity (FISH)	LOS Capacity (110%)	Students Enrolled (Oct. 23)	Reserved Plus Contiguous Service Area	Available Capacity	Project's Impact	Seats to Mitigate	Bus required
Paterson ES	1105	1216	688	60	Y	46	0	Y
Lake Asbury JH	1353	1488	994	435	Y	15	0	Y
Fleming Isl HS	2408	2649	1864	230	Y	28	0	Y

School Capacity is based on the School Concurrency Service Area (SCSA) or one or more Contiguous Concurrency Service Areas (CSCSA). No capacity is available in the SCSA. Capacity is available in the CSCSA. Capacity figures from the table above will be reflected in subsequent updates to each school Development Review Table. SCRC expiration terms: For single family uses, a preliminary plat has not been approved by the Planning Commission within six months (Sep 25, 2024) of CRC issuance or a final plat has not been approved by the Board and recorded in the public records within twenty-four months (March 25, 2026) of CRC issuance.


Lance Addison

Coordinator; Planning and Intergovernmental Relations
Facility Planning and Construction

Clay County District Schools

Ph: (904) 336-6852 e-mail: lance.addison@myoneclay.net

Extended to March 25, 2028
Section 252.363 - Hurricane Debby

Extended by Paul Bement
9/6/2024



School Concurrency Reservation

- 160 SF Units generate:
 - 41 Elementary Students
 - 13 Junior High Students
 - 26 High School Students

Staff Findings

1. PUD and Land Use Amendment **recommended for approval by Staff**
2. “The **subject property is located in an area transitioning from rural to suburban character** and will be a similar density to that which has been approved on the parcel at the northwest corner of CR 315/CR 315A”
3. “The surrounding properties are residential or wooded and there are no immediately adjacent agriculture areas or activities. The existing timber use on the parcel on the west side of CR 315 across from the site was zoned PUD and approved for a Single-Family Subdivision.”
4. “Residential development on the subject parcel will be able to benefit from the recently completed Cathedral Oak roadway to the north and the adjoining commercial development that will follow.”
5. “The Agriculture district boundary (on this site) is illogically drawn as it cuts across the subject parcel in a diagonal line which serves no apparent purpose”
6. “The **proposed rezoning is compatible** with the objectives and policies of the Rural Fringe Future Land Use proposed in the Comprehensive Plan Amendment”

Summary

1. Project within corridor of county **poised, entitled, and prepared for growth**
(**Significant infrastructure investments in the ground, and continuing to come online**)
3. **Project is compatible** with existing residential to the north + east and future residential to the north + west + south
4. **Project revised based on community feedback**, reduced and enhanced development proposal/density
5. Proposes **funding and construction of turn lane at CR 315/SR 16** in addition to \$1.2M of Mobility Fees due
 - Mobility Fees are assessed to ensure new development “contributes its fair share” “mitigating effects of new growth”
6. **Traffic along CR 315 at SR-16 has already decreased** since opening of FCE and Cathedral Oaks
(Traffic counts show **~35% reduction in the AM, ~20% reduction in PM**)
7. **Clay Dairy Parkway (315 realignment) will largely eliminate bypass traffic on 315**, will revert to local residential road
(Southern portion underway, northern portion nearing kick-off as part of Peters Creek PUD)
8. **Project has School Concurrency reservation at all three levels**

Questions

Kimley Horn & Associates Planning	Kimley-Horn and Associates Civil Engineering/Transportation	Pulte Homes Project Builder
Mark Shelton, AICP Senior Urban Planner	Bill Schilling, P.E. Civil Engineer / Transportation Planner	Garrett Queener Land Planning & Entitlements Manager

Reference Only

Clay Dairy Parkway (CR-315 Realignment)

South of SR-16 (Governors Park) (4.1)

- Portions of Right of Way already in place
- Permitting in process for portion from US-17 to FCE
- Utilities installed within future ROW areas
- Entire length required to be constructed no later than Phase III of Governors Park

North of SR-16 (Peters Creek Business Park) (4.2)

- Timing triggers in PUD allow Phase I of Business park to begin upon opening of FCE + Cathedral Oaks.
- Phase I allows for industrial, warehousing, residential, realignment of CR 315





Agenda Item
PLANNING COMMISSION

Clay County Administration Building
Tuesday, December 2 5:00 PM

TO: Planning Commission

DATE: 10/3/2025

FROM: Jenni Bryla, AICP, Zoning
Chief

SUBJECT:

This application cannot be heard at this time as the Applicant did not advertise the item.

This application is a Rezoning to change 2.51+/- acres from Commercial and Professional Office District (BA-2) to Community Business District (BB-2).

AGENDA ITEM TYPE:



Agenda Item
PLANNING COMMISSION

Clay County Administration Building
Tuesday, December 2 5:00 PM

TO: Planning Commission

DATE: 11/12/2025

FROM: Jenni Bryla, AICP, Zoning
Chief

SUBJECT: An Ordinance to administratively rezone four lots within the Keystone airport from the Industrial Select (IS) zoning district to Heavy Industrial (IB) zoning district to accommodate airport uses and equipment.

AGENDA ITEM TYPE:

BACKGROUND INFORMATION:

The Keystone Airport has been in existence in some form prior to the 1960's. The land is owned by the City of Keystone, however the land is located in unincorporated Clay County. The zoning designation for the Keystone airport is currently Industrial Select (IS), which does not allow outdoor storage or activities that are not in a fully enclosed building.

ATTACHMENTS:

Description	Type	Upload Date	File Name
Staff Report ▣ ZON 25-0033	Cover Memo	11/24/2025	PC_Staff_Report_-_ZON_jb_bc_dsada.pdf
▣ 30-day letter	Backup Material	11/24/2025	30_notice_letter_keystone_airport_final_dsada.pdf
▣ Ordinance	Ordinance	11/24/2025	Ordinance_zon_25-0033_dsada.pdf



Staff Report and Recommendations for ZON 24-0033

Copies of the application are available at the Clay County

Administration Office, 3rd floor, located at 477 Houston Street Green Cove Springs, FL 32043

Introduction:

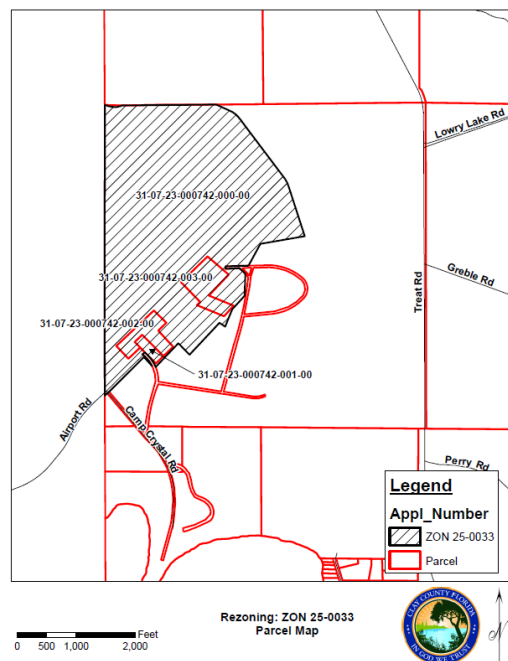
This is an administrative re-zoning request for a Zoning Atlas change of the Zoning designation for four lots within the Keystone Airport from Industrial Select (IS) to Industrial Heavy (IB) to accommodate airport uses and equipment.

Property: Parcel #'s 31-07-23-000742-000-00, 31-07-23-000742-003-00, 31-07-23-000742-002-00, 31-27-23-000742-001-00

Background:

The Keystone Airport has been in existence in some form prior to the 1960's. The land is owned by the City of Keystone, however the land is located in unincorporated Clay County. The western half of the property is located in Bradford County. The land in Clay County was given a zoning designation in 1991, after the County's first Comprehensive Plan was adopted. The zoning designation for the Keystone airport is currently Industrial Select (IS), which does not allow outdoor storage or activities that are not in a fully enclosed building. This requirement is not standard operating procedure for an airport that continually has planes and activities out of hangers. The IS zoning district is intended for Light Industry and office and showroom space. The request to change the IS zoning to Heavy Industrial (IB) is being requested by Staff, in order to set the airport up with the correct zoning for the activities taking place at the facility.

Figure 1 – Location Map

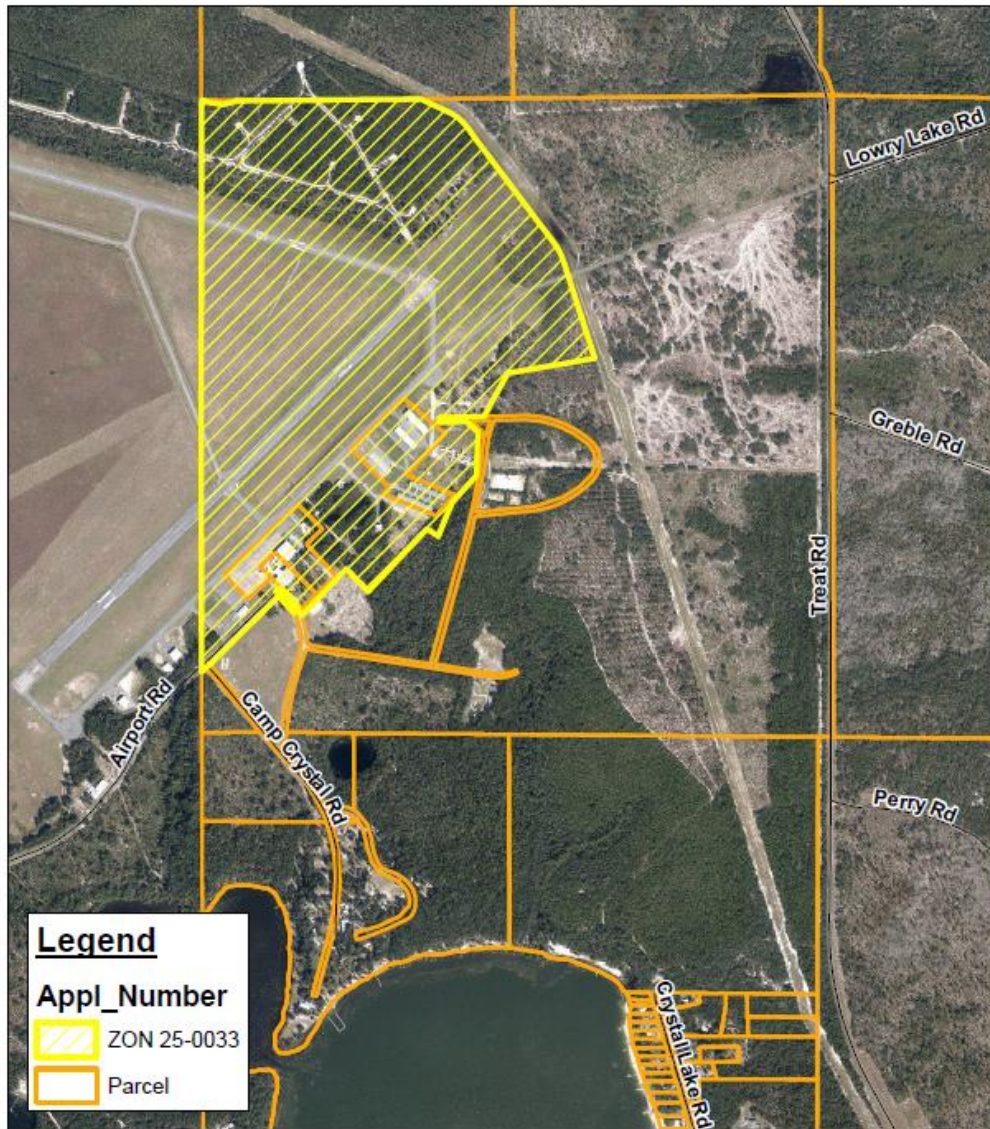


26

27

28

Figure 2 - Aerial Photo



0 500 1,000 2,000 Feet

Rezoning: ZON 25-0033
from IS to IB



29

30

Figure 3 – Existing Zoning Map

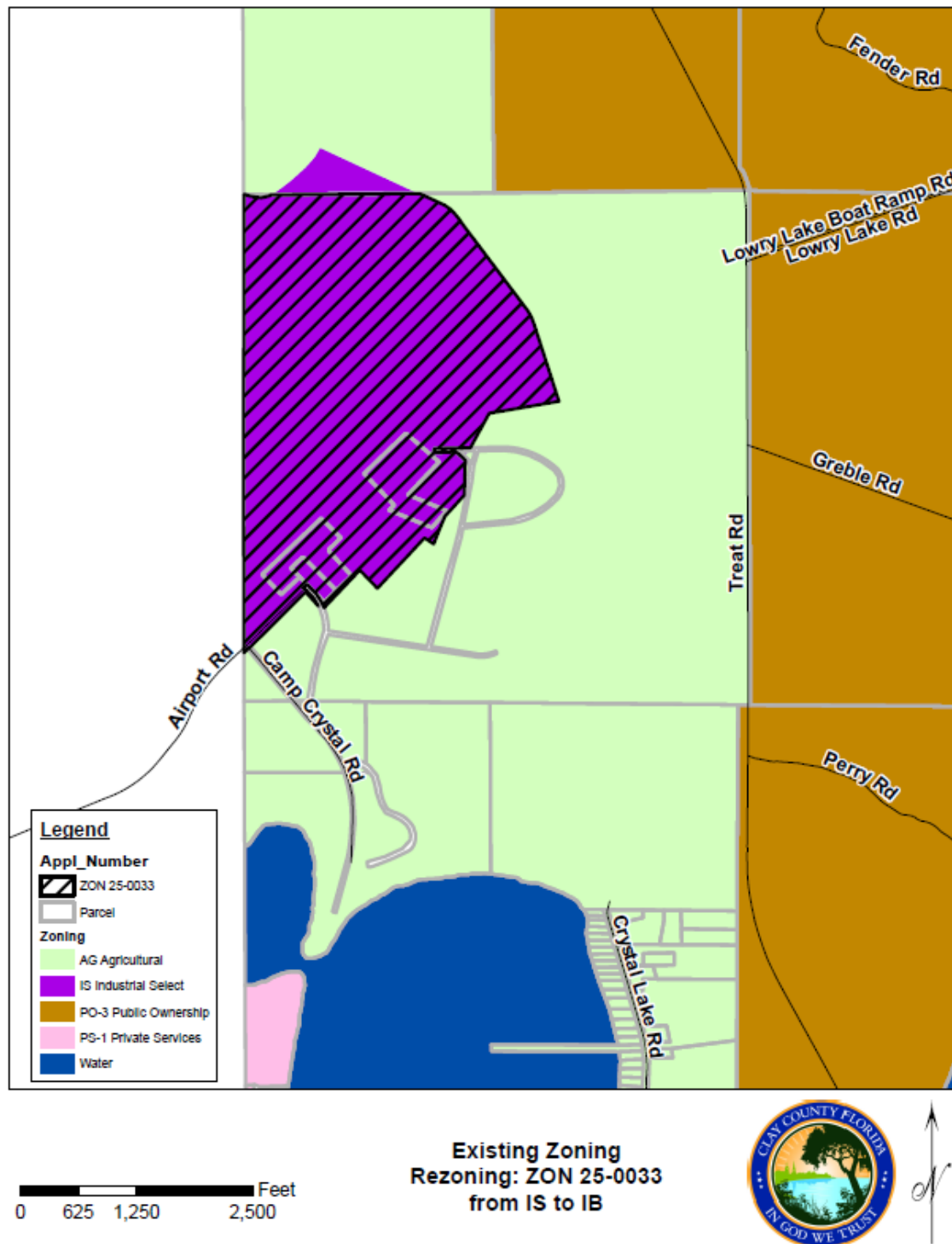
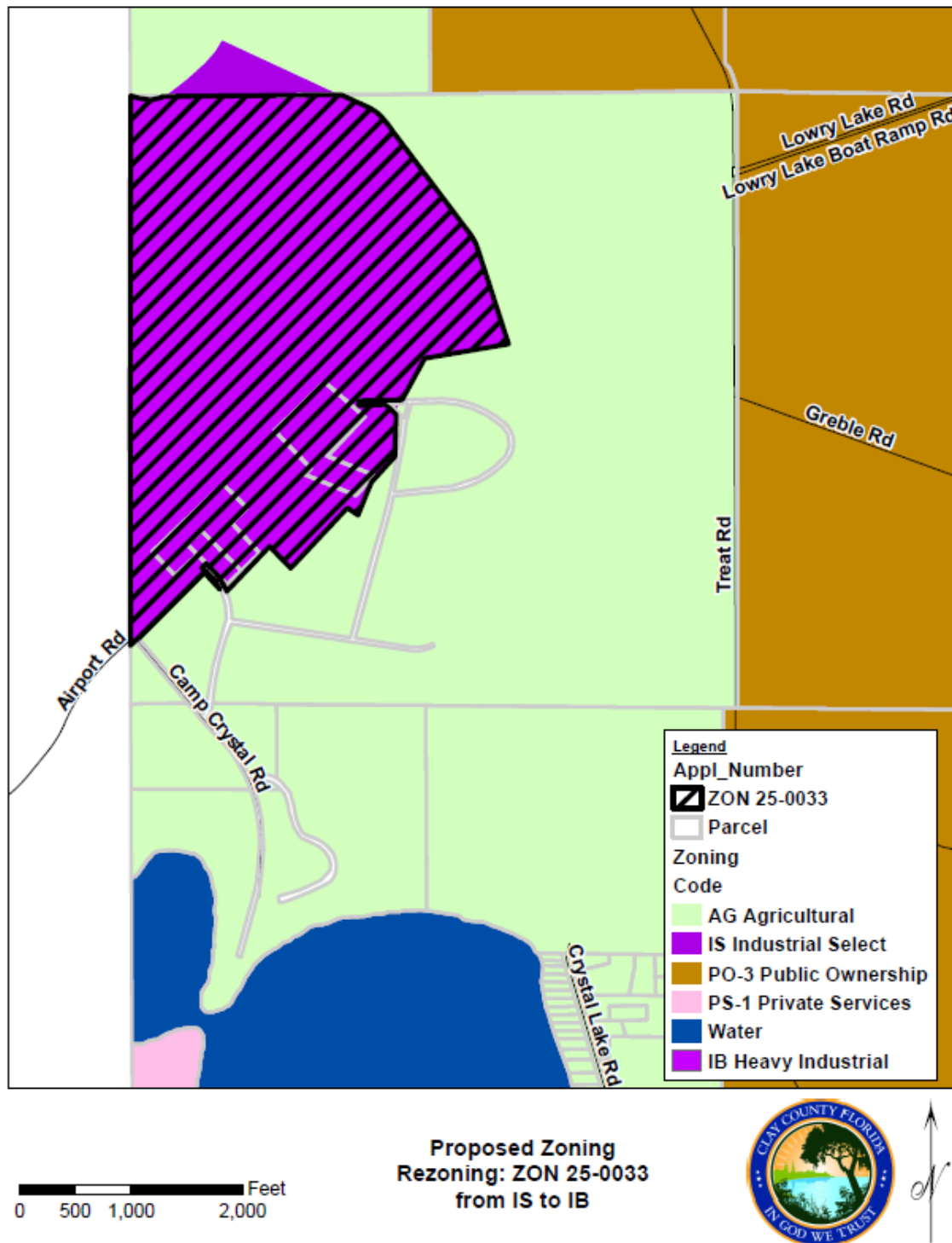


Figure 4 – Proposed Zoning Map



Analysis of Surrounding Uses

The proposed rezoning would change a portion of the total parcel acreage of a single parcel of land (247.85 acres) from Industrial Select (IS) to Heavy Industrial (IB). This change would not change the current activities of the airport but be in keeping with the happenings of the airport and their future needs. The surrounding districts surrounding the airport are shown in the table below:

	Future Land Use	Zoning District
North	Agriculture (AG)	Agriculture (AG)
South	Agriculture (AG)	Agriculture (AG)
East	Agriculture (AG)	Agriculture (AG)
West	Bradford County	Bradford County

Relevant Clay County 2045 Comprehensive Plan Policies

The following Goals/Objective/Policies relate to the proposed Comprehensive Plan Amendment:

FLU OBJ 1.4(12)

Industrial - "IND": This designation accommodates the full range of industrial activities. The specific range and intensity for uses appropriate in a particular industrial area varies by location as a function of the availability of public services and access, and compatibility with surrounding uses shown on the Future Land Use Map. Through the zoning review process the use of particular sites or areas may be limited to allowable uses specified and defined by the Land Development Regulations. Floating solar facilities on properties with an Industrial future land use shall be a permitted use on wastewater treatment ponds, abandoned limerock mine areas, stormwater treatment ponds, reclaimed water ponds, and other water storage reservoirs as regulated in the Land Development Code.

EDE OBJ 1.1

Clay County shall create a local economic development environment through a coordinated strategy that is conducive to the creation and growth of new businesses and the expansion of existing businesses.

EDE POL ICY 1.2. 1

Clay County shall prioritize the land use planning of sites meeting the locational requirements of identified targeted/key industries and basic industries uses in appropriate and compatible locations and recognize this priority during the review of plan amendments, rezoning requests, site plan approvals and permitting processes.

63 Analysis of Proposed Rezoning Amendment

64 In reviewing the proposed application for Rezoning, the following criteria may be considered along with such
65 other matters as may be appropriate to the particular application:

66
67 (a) Whether the proposed change will create an isolated district unrelated to or incompatible with
68 adjacent and nearby districts;

69 Staff Finding: This application is a rezoning that brings the airport into compliance with the industry that
70 is ongoing there. The changes within the subject parcels would not create an isolated or unrelated district that
71 is not currently in place.

72 (b) Whether the district boundaries are illogically drawn in relation to the existing conditions on the real
73 property proposed for change;

74 Staff Finding: The district boundaries should have been complimentary with the airport initially when the
75 airport was zoned administratively in 1991.

76 (c) Whether the conditions which existed at the time the real property was originally zoned have changed
77 or are changing, and, to maintain consistency with the Plan, favor the adoption of the proposed Rezoning;

78 Staff Finding: The district boundaries were intended to support the Keystone Airport, unfortunately the IS
79 zoning district only supports light manufacturing, showrooms and services in an enclosed building. The
80 airport conducts operations outside of the hanger space as well as office operations. The Heavy Industrial
81 (IB) zoning district would accommodate these operations.

82 (d) Whether the affected real property cannot be used in accordance with existing zoning;

83 Staff Finding: The existing zone does not allow the airport to operate as it was intended. The airport was
84 established prior to the creation of zoning in the County.

85 (e) Whether the proposed Rezoning application is compatible with and furthers the County's stated
86 objectives and policies of the Plan;

87 Staff Finding: The proposed rezoning is compatible with the Comprehensive Plan and supports the intent
88 of the future land use designation to support economic growth.

89 (f) Whether maintenance of the existing zoning classification for the proposed Rezoning serves a
90 legitimate public purpose;

91 Staff Finding: There is a legitimate public purpose served by changing the zoning to be consistent with the
92 use of the property and the tenants of the Comprehensive Plan.

93 (g) Whether maintenance of the status quo is no longer reasonable when the proposed Rezoning is
94 inconsistent with surrounding land use;

95 Staff Finding: The proposed rezoning will not be inconsistent with the surround land use. The airport will
96 continue to develop as it has in the past.

97 (h) Whether there is an inadequate supply of sites in the County for the proposed intensity or density
98 within the district already permitting such intensity or density.

99 Staff Finding: The intensity and density on the subject parcel will not be changed by this rezoning. The use
100 has been established since 1958.

101

102 **Recommendation**

103 Staff recommends approval of ZON 25-0033.

104



NOTICE TO PROPERTY OWNERS OF A

PROPOSED REZONING

October 31, 2025

The Clay County Planning Commission and the Board of County Commissioners propose to consider ZON 25-0033 for the following item:

- Application:** An Ordinance to administratively rezone four lots from Industrial Select (IS) zoning district to Heavy Industrial (IB) zoning district.
- Requested Action:** A Zoning Atlas change of the Zoning designation for four lots within the Keystone Airport to accommodate airport uses and equipment.
- Subject Property:** The properties are located within the Clay County portion of the Keystone Airport that currently have a Future Land Use of Industrial (IND). A map of the parcels is set forth below.
- Parcel(s):** A portion of lot 31-07-23-000742-000-00, and all of lots 31-07-23-000742-001-00, 31-07-23-000742-002-00, & 31-07-23-000742-003-00
-

The Title for this item is as follows:

AN ORDINANCE OF THE BOARD OF COUNTY COMMISSIONERS OF CLAY COUNTY FLORIDA, PURSUANT TO ARTICLE III OF THE CLAY COUNTY LAND DEVELOPMENT CODE, KNOWN AS THE ZONING AND LAND USE LDRs ADOPTED PURSUANT TO ORDINANCE 93-16, AS AMENDED, PROVIDING FOR THE REZONING OF FOUR PARCELS OF LAND: A PORTION OF PARCEL ONE (TAX PARCEL IDENTIFICATION # 31-07-23-000742-000-00), TOTALING APPROXIMATELY 247.85 ACRES; AND PARCELS TWO THROUGH FOUR (TAX PARCEL IDENTIFICATION #s 31-07-23-000742-001-00, 31-07-23-000742-002-00, & 31-07-23-000742-003-00), TOTALING APPROXIMATELY 17.05 ACRES, FROM THEIR PRESENT ZONING CLASSIFICATION OF INDUSTRIAL SELECT (IS) TO HEAVY INDUSTRIAL (IB); PROVIDING A DESCRIPTION; PROVIDING AN EFFECTIVE DATE.

This item will be heard at the following public hearings. Interested persons may appear at the public hearings and be heard with respect to the proposed application.

Planning Commission:

Tuesday, December 2, 2025, at 5:00 p.m., or as soon thereafter as can be heard

Board of County Commissioners:

First Hearing Tuesday, December 9, 2025, at 5:00 p.m., or as soon thereafter as can be heard

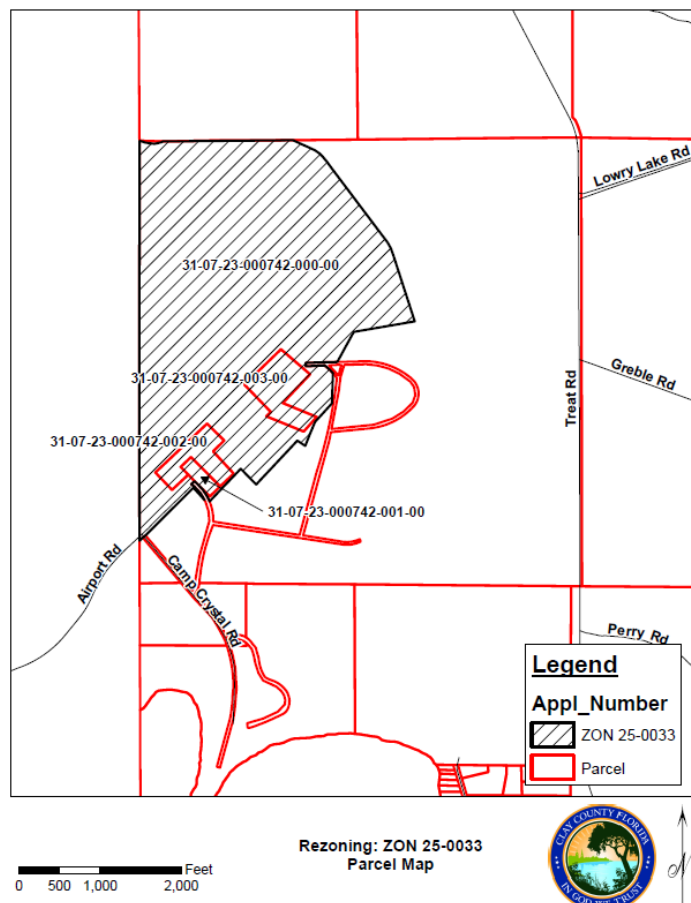
Second Hearing Tuesday, January 13, 2026, at 5:00 p.m., or as soon thereafter as can be heard

These hearings will be held in the BCC Meeting Room, 4th Floor, Clay County Administration Building, 477 Houston St, Green Cove Springs, Florida.

OPT OUT: You may choose to opt out of this administrative zoning change. Please contact the Clay County Planning and Zoning Division, Third Floor of the County Administration Building, between the hours of 8:30 a.m. and 4:30 p.m., Monday through Friday, excluding legal holidays.

If you have any questions or need additional information regarding this application, please contact the Clay County Planning and Zoning Division at (904) 529-3830.

Lots included in the rezoning



ORDINANCE 2025-

Be It Ordained by the Board of County Commissioners of Clay County:

AN ORDINANCE OF THE BOARD OF COUNTY COMMISSIONERS OF CLAY COUNTY FLORIDA, PURSUANT TO ARTICLE III OF THE CLAY COUNTY LAND DEVELOPMENT CODE, KNOWN AS THE ZONING AND LAND USE LDRs ADOPTED PURSUANT TO ORDINANCE 93-16, AS AMENDED, PROVIDING FOR THE REZONING OF FOUR PARCELS OF LAND (TAX PARCEL IDENTIFICATION #s 31-07-23-000742-000-00, 31-07-23-000742-001-00, 31-07-23-000742-002-00, 31-07-23-000742-003-00) TOTALING APPROXIMATELY 264.9 ACRES, FROM THEIR PRESENT ZONING CLASSIFICATION OF INDUSTRIAL SELECT (IS) TO HEAVY INDUSTRIAL (IB); PROVIDING A DESCRIPTION; PROVIDING AN EFFECTIVE DATE.

Section 1. Ordinance 2025-00XX, seeks to rezone certain real property (tax parcel identification #s 31-07-23-000742-000-00, 31-07-23-000742-001-00, 31-07-23-000742-002-00, 31-07-23-000742-003-00, (the Property), depicted in Exhibit “A-1”).

Section 2. The Board of County Commissioners approves the rezoning request. The zoning classifications of the Property are hereby changed from Industrial Select District (IS) to Heavy Industrial District (IB).

Section 3. Nothing herein contained shall be deemed to impose conditions, limitations or requirements not applicable to all other land in the zoning district wherein said lands are located.

Section 4. The Building Department is authorized to issue construction permits allowed by zoning classification as rezoned hereby.

Section 5. This Ordinance shall become effective as provided by law.

DULY ADOPTED by the Board of County Commissioners of Clay County, Florida, this _____ day of January ___, 2026.

BOARD OF COUNTY COMMISSIONERS
OF CLAY COUNTY, FLORIDA

By: _____

, Its Chairman

ATTEST:

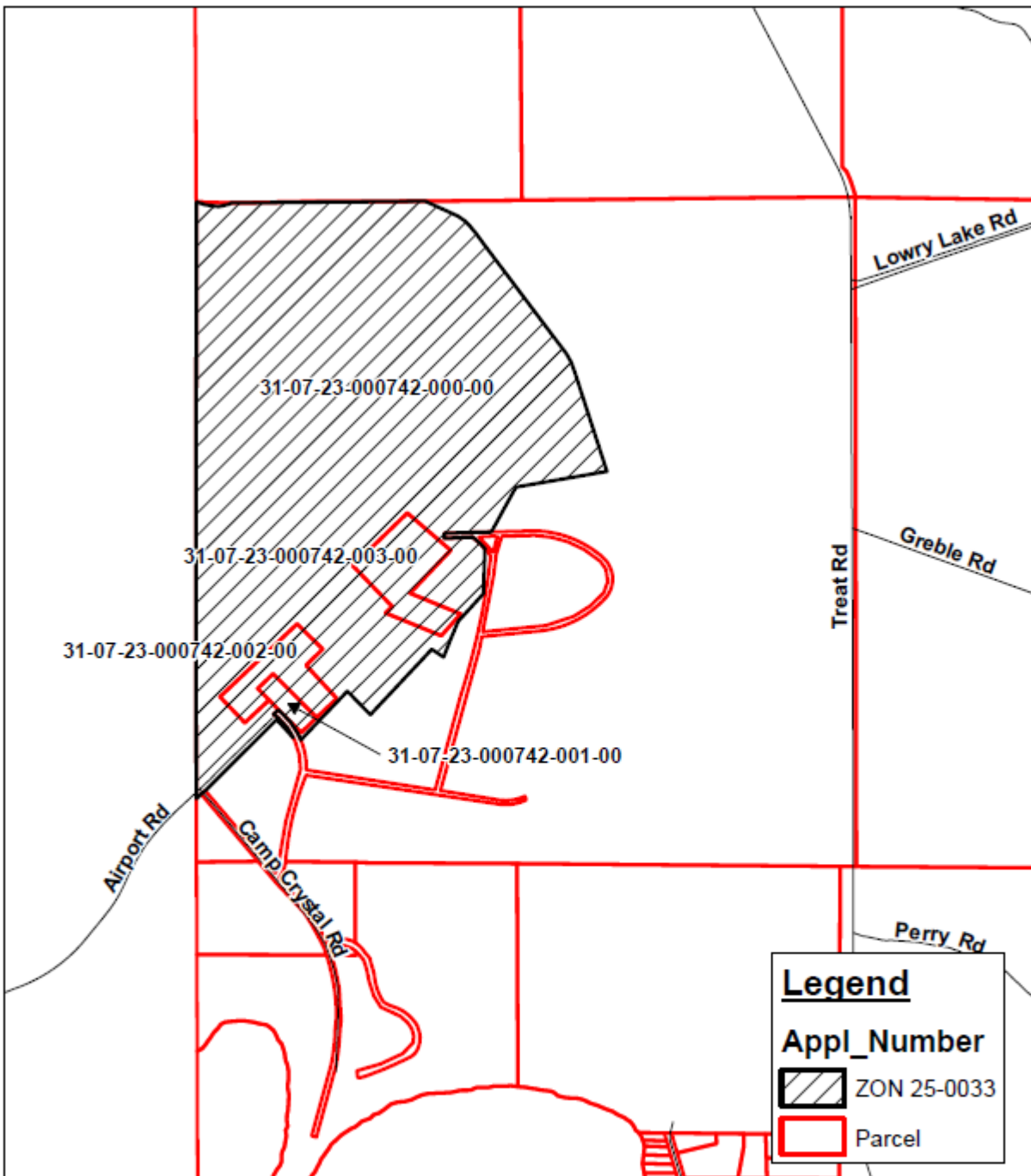
By: _____

Tara S. Green,

Clay County Clerk of Court and Comptroller

Ex Officio Clerk to the Board

Exhibit A-1



0 500 1,000 2,000 Feet

Rezoning: ZON 25-0033
Parcel Map

