



City of Pensacola

Environmental Advisory Board

Agenda

City of Pensacola
222 W. Main Street
Pensacola, FL 32502

April 3, 2025, 2:00 PM

Vince-Whibbs, 1st Floor

One or more members of City Council may be in attendance.

The meeting can be watched via live stream at cityofpensacola.com/video.

CALL TO ORDER

ROLL CALL

PRESENTATIONS

STAFF COMMUNICATIONS

ACTION ITEMS

DISCUSSION ITEMS

1. 25-419 LAND DEVELOPMENT CODE (LDC) REVIEW INPUT LIST

Recommendation:

Sponsors: Katie Dineen - Chair

Attachments: 00_Pensacola LDC Approach_v6
City Arborist LDC thoughts

BOARD MEMBER COMMENTS

PUBLIC COMMENT

ADJOURNMENT

If any person decides to appeal any decision made with respect to any matter considered at such meeting, he will need a record of the proceedings, and that for such purpose he may need to ensure that a verbatim record of the proceedings is made, which record includes the testimony and evidence upon which the appeal is to be based.

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City of Pensacola

222 West Main Street
Pensacola, FL 32502

Memorandum

File #: 25-419

Environmental Advisory Board

4/3/2025

DISCUSSION

SPONSOR: Katie Dineen - Chair

SUBJECT:

LAND DEVELOPMENT CODE (LDC) REVIEW INPUT LIST

RECOMMENDATION:

HEARING REQUIRED:

SUMMARY:

Currently, the LDC is undergoing review and revisions; as part of that process input is being sought.

Based on previous discussions of the Environmental Advisory Board, there is a desire to create a list of inputs to provide regarding the LDC review.

This item allows for a discussion of and creation of a list to be submitted as input from the EAB.

PRIOR ACTION:

FUNDING:

N/A

FINANCIAL IMPACT:

N/A

LEGAL REVIEW ONLY BY CITY ATTORNEY: No

STAFF CONTACT:

Don Kraher, Council Executive
Katherine Kuhn, Environmental Coordinator
Chase Crawford, City Arborist

ATTACHMENTS:

1. 00_Pensacola LDC Approach_v6
2. City Arborist LDC thoughts

PRESENTATION: No

TO: Cynthia Cannon, AICP, Planning & Zoning Division Manager
CC: Sherri Morris, AICP, Development Services Department Director
FROM: Patricia Tyjeski, AICP, Project Manager
DATE: April 9, 2024
SUBJECT: LDC Assessment Recommendations – Approach to LDC Update

A brief look through the Pensacola Land Development Code (LDC) shows that the City is committed to protecting its rich collection of historic resources; encouraging and facilitating sensible infill and redevelopment; preserving the character of the City core; and extending the core’s best qualities, such as walkability, grid pattern, and traditional urban form, to other areas of the City. It is also evident that incremental changes over the years have made the code lengthy and difficult to navigate.

The City engaged Inspire Placemaking Collective, Inc. (Inspire) to assist with a review of the LDC and develop recommendations for improvement. The LDC assessment exercise included a thorough review of the LDC by the Inspire Team and significant input from staff and some stakeholders identified by the City. This memorandum contains recommendations for the update of the LDC based on that assessment.

I. OVERVIEW

The intent of the LDC is to implement the City’s vision for growth; not just for the City as a whole, but also for the diverse neighborhoods that comprise the City. To implement that vision, the LDC should set clear standards for development and redevelopment and establish development review processes and procedures.

The LDC is used by different groups for different purposes. Property owners use the LDC to determine what they (and their neighbors) can do on their property; developers/designers use it to design new buildings and sites or modifications to existing development; and City staff and appointed/elected officials use the code to review applications for compliance and compatibility. The common desire among these groups is to have a code that is easy to navigate, predictable, and clearly enforceable. This should be the City’s main priority when updating the LDC.

The staff/stakeholder input exercise during the assessment indicated that, even though the main vision for the City and most neighborhoods is clear and still on track, there are some neighborhoods that have evolved in another direction and may need to revisit their vision. For example, neighborhoods zoned for commercial or mixed-use becoming predominantly residential, or neighborhoods where the lot sizes or setbacks are no longer working. Addressing those challenges will require more intensive public input and should not be combined with a major LDC rewrite that addresses numerous other topics. After the LDC is reorganized and clarified, the City should take on addressing issues that are particular to

neighborhoods and could become more controversial. This strategy would allow for ample public input, best management practices research, and a focus on the issue at hand.

Based on the LDC assessment and input from staff and stakeholders, the Inspire Team produced several documents with recommendations to improve the LDC. The documents are attached as Exhibits to this memorandum. The following is a summary of each.

- The **reorganization** document (Exhibit 1) proposes to create a series of 13 chapters, each with a specific topic (e.g., definitions, zoning, procedures, landscaping). As the code has been updated in the past to address changing conditions and priorities, the topics have lost their “home” and as a result, the topics are repeated throughout the code, which causes confusion, redundancy, and unnecessary length. For instance, Chapter 12-3 does not include only zoning requirements. It also includes standards for signs, landscaping, procedures, accessory structures, and many other topics.
- The **LDC matrix** (Exhibit 2) contains an extensive list of specific provisions that the LDC rewrite should address, as identified by Inspire, the stakeholders, and staff. The team held daily work sessions over an entire week to review questions and address matrix items that required clarification or discussion. After those work sessions, the Inspire Team completed the Action column, which gives specific directions for addressing all the issues raised. This column also notes which items can be addressed during the upcoming LDC rewrite and which items should be addressed individually because they require more substantial public involvement and should therefore be addressed outside of the initial LDC rewrite.
- The **tables of uses and dimensional standards** (Exhibits 3 and 4) allow a side-by-side comparison of districts. These tables were the first step in creating a streamlined and more user-friendly LDC and will prove helpful in consolidating zoning districts as noted in the matrix.
- The tables comparing design standards applicable to **Historic, Redevelopment, and Design Districts** (Exhibits 5, 6 and 7) identify and illustrate the degree of repetition currently found in the code. The LDC rewrite will correct this repetition through better organization and presentation of the regulations. The rewrite will also make similar adjustments in areas that would not create controversy or require substantial public input.

Most of the items listed above (i.e., reorganization, the Matrix, tables and charts, and consolidation of standards) can be addressed as part of the overall LDC rewrite. We recommend that the City use separate ordinances to address items that require more focus and that could be controversial in order to avoid a delay in the approval of important structural changes. The *Proposed Scope* section recommends steps for addressing the update of the LDC.

II. URBAN PATTERNS

The street grid and urban fabric of the City’s downtown and surrounding areas exhibit traditional and formal elements typical of early settlements. The waterfront-oriented downtown is specifically characterized by a traditional grid layout with narrow streets and historic buildings, exemplified in the Palafox Historic District. With a dense concentration of shops, restaurants, cultural and institutional uses, and historic landmarks within close proximity, the area is highly walkable. This inter-connected pattern continues with a mixture of commercial and residential development in the Pensacola Historic

District, North Hill Preservation District, Old East Hill Preservation District, and other areas directly adjacent to downtown, such as the Gateway and Waterfront Redevelopment Districts. The establishments of these and the Aesthetic Review Districts, such as the Palafox Historic Business District, North 9th Avenue Corridor District, and CRA Urban Design District, exemplify the City's commitment to preserving its architectural heritage and character. Outside these areas, the urban fabric becomes less structured and connected. Following a more post-war suburban model, these outside areas lack connectivity, have limited sidewalks, have longer distances between destinations, and segregate commercial and residential areas, making them more automobile oriented and reliant.

The City has already put a lot of effort into creating standards that require new development and redevelopment to contribute to the maintenance/creation of a traditional urban form which translates into walkable environments. Several issues, however, became evident in the preparation of the matrix and during the work sessions related to urban form: Pressure from suburban development patterns, difficulties meeting parking and stormwater requirements, and the potential for additional building height.

There is a lot of pressure from the development community to approve **suburban style** developments (building in the back, parking in front) particularly along arterial roads. Although this style has been the predominant pattern for many decades in Florida, more and more communities are revisiting their regulations to bring back the prominence and safety of pedestrians. Pensacola has made great advances on this and should continue to do so. Even FDOT has changed its focus on mobility and is now using roadway context classification and encouraging the creation of complete streets to shift the focus from moving cars through our cities, to ensuring that all modes of transportation are safely accommodated. The City's commitment to development patterns that address all modes of transportation and provide for pedestrian safety is a policy decision. If the City intends to continue this commitment, the LDC should include appropriate regulations to fulfill that intent.

The issue of **parking** affects all urban areas. Although infill and redevelopment are encouraged in the core, the traditional small lots do not easily accommodate the more modern types of development. The City has the authority to eliminate parking requirements to facilitate redevelopment and infill, but most people in Florida still own and circulate in cars. If the City waives parking requirements, there will still be a need for parking in and near the core. Cities that have included waivers for parking have public parking areas nearby. The parking waiver can also be in the form of a payment to a public parking fund in lieu of providing on-site parking. A parking study can help identify the availability and location of public parking areas to justify any waiver. In the meantime, the City should consider offering a wide variety of options for parking: on-site, shared, on-street, remote, and payment in lieu of providing on-site spaces.

In addition to the parking challenges, small sites also find it difficult or nearly impossible to provide on-site **stormwater** facilities. The City, however, is not in a position to waive stormwater management requirements. Low Impact Design practices may help treat stormwater, but these options do not address the state agency requirements. The City could consider establishing a master stormwater system that accepts drainage from the core development sites. A master stormwater system takes time to establish and until that system is operational, development and redevelopment must continue to abide by water management district requirements.

Building **height** is one of several provisions in the LDC that would benefit from more clarity and predictability in its language. Several zoning districts permit a base height but offer additional height either through conditions, conditional use, or bonuses. The LDC rewrite will help clarify those instances so that citizens, developers, and staff have better parameters and understand where additional building height could be realized. A 3D visualization exercise and massing study would help citizens understand the potential for building height currently permitted, with and without bonuses, as well as potential compatibility problems with adjacent uses. The technology is available now to easily do this. Inspire has worked with Gridics in the past and would suggest collaborating with them. Gridics is a technology company and market leader in the integration of 3D mapping and online zoning codes.

III. AFFORDABLE HOUSING

As the city has grown, property values have been rising and housing affordability has suffered. The adopted comprehensive plan calls for land development regulations to allow flexibility within some zoning districts to provide for affordable housing (Policy FLU-1.8.2) and to include standards for residential density bonuses and density transfers above the limit established by the future land use category (up to 25% in certain districts) in exchange for the construction of affordable housing (Policy FLU-1.8.3). That policy also allows density transfers of up to 50% of the donor site's maximum density. Objective H-2.4 and associated policies direct the City to encourage and facilitate the creation of quality affordable housing throughout the City, while Objective H-2.5 calls for innovative programs and regulations to create and preserve such housing. The Housing Element contains numerous other policies related to the provision of affordable housing. The only direct mention of affordable housing in the LDC is Section 12-3-109, which offers the incentives listed in the comprehensive plan for the provision of affordable housing.

The lack of affordable housing was a topic covered during the work sessions. Staff were eager to learn what other communities are doing to incentivize the provision of units that are affordable to various income levels. Although the City already has a density transfer and bonus program incentivizing the provision of affordable housing, there is concern that not many developers are using it. There are other tools that the city could use to help with the provision of affordable units. These tools include:

1. **Reduced parking requirements.** As mentioned earlier, one of the greatest site design challenges for infill and redevelopment is meeting the City's parking requirements (LDC §12-4-1). For developments that include affordable housing, the City could also consider providing flexibility if the development is served by the ECAT transit system.
2. **Parking exceptions for ADUs.** Section 12-3-81(c)(6) of the LDC requires that all accessory residential dwelling units (ADUs) be provided with one off-street parking space. Requiring off-street parking for such units increases the cost of development, which may be passed along through higher rents for prospective tenants. If the intent of allowing accessory dwelling units is to encourage the provision of affordable housing, the City should consider reducing the ADU parking standards like other cities across the state have done. The following are some examples:
 - a. The City of Orlando does not require off-street parking for accessory dwelling units less than 500 sf in size, as long as the principal structure meets the City's current parking requirements (LDC §58.501F). ADUs above this size are required to provide an off-street parking space.

- b. The City of St. Petersburg exempts off-street parking requirements for ADUs if the units are located within 0.25 miles of a transit route, are less than 600 sf in size, are located on an alley, all required parking for the single-family home is accessed from the alley, and there is no front-loading driveway.
3. **Update the definition of 'family.'** LDC §12-13 currently defines a 'family' as "one or more persons occupying a dwelling unit and using common utility services, provided that unless all members are related by blood or marriage, no such family shall contain over four persons." There are two potential issues with this definition:
 - a. This definition defines a family by "blood or marriage" alone, and therefore excludes a variety of non-traditional housing types. Examples include households with non-married parents and their children, married adults with non-biological children (i.e., stepchildren, adopted children, or foster children), and families who share a household with a family friend.
 - b. This definition also states that families not meeting the "blood or marriage" requirement are limited to no more than four persons per household. Besides potentially excluding each of the non-traditional households described above, these occupancy limitations can have a dramatic effect on housing affordability as well. These limitations may prevent young professionals from living together to save for more permanent housing, cohabitating workers who cannot afford to have their own place, or graduate students who share a house near their college. Two of the most commonly-cited fears associated with relaxing occupancy limits are excessive noise and overflow parking—both of which are more appropriately addressed directly via code enforcement rather than indirectly with a strict definition of 'family.'
4. **Single-room occupancy (SRO) developments.** Single room occupancy (SRO) refers to a historical type of rental accommodation where each tenant has their own private room but often shares communal facilities like bathrooms and kitchens with others. Due to the shared nature of SROs, rents are often much lower than standard multifamily dwellings, and therefore typically attract low-income populations such as students, the elderly, unemployed individuals, or persons with intellectual or physical disabilities. The City of Gainesville currently permits SROs by right in mixed use, moderate, and high-density residential zoning districts, subject to additional use standards (Gainesville LDC §30-5.8.) These additional standards include bedroom limitations, transit proximity, and laundry, bathroom, kitchen, and management requirements. Many of these standards are currently in the process of being relaxed to allow for increased flexibility.
5. **Development flexibility.** As detailed extensively in the American Planning Association's Equity in Zoning Policy Guide (2022), one of the greatest contributors to the affordable housing crisis continues to be restrictive single-family zoning regulations. In addition to cultivating inefficient uses of land, the report also states that "evidence shows that [single-family zoning] has a disproportionate impact on the ability of historically disadvantaged and vulnerable groups to access attainable housing and quality schools and services."

A significant portion of the City of Pensacola is zoned exclusively for single-family detached use (R-1AAA, R-1AAAA, or R-1AAAAA). In addition to prohibiting attached dwellings, duplexes,

triplexes, or quadplexes, these districts also have sizable dimensional requirements relating to minimum lot area, width, and setbacks—all of which increase the cost of developing (and as a result, purchasing or renting) within these areas of the City. Increasing the flexibility in low and moderate density districts would cultivate a more comprehensive and effective approach to local housing reform. Addressing this issue, however, would be challenging and require more substantial public input than the LDC rewrite includes.

6. **Residential bonus density program.** There are several items within the City’s residential density bonus program (LDC §12-3-109) which should be amended to increase program clarity and popularity. These recommended improvements are listed below:

- a. *Decouple the density transfer provisions.* The program’s current language includes regulations pertaining to density transfers, which should be regulated separately from the density bonus program. However, sites participating in the density transfer program should continue to be allowed to utilize the density bonus program.
- b. *Tabulate applicability provisions.* A table can summarize much of the program’s language to clearly indicate what levels of increased densities can be achieved based upon the public benefits provided by the development (e.g., affordable housing, superior building/site design, etc.).
- c. *Refine the affordable housing provisions.* The primary objectives of the bonus program are currently unclear. For example, it is clear that the City wants to increase the supply of affordable housing. However, it does not specify which income level it is targeting. Is there a greater need for housing serving income levels below 80% of the area median income (AMI)? Is there any housing in the City now that is affordable for the very low-income households (50% AMI)? Does the City want to target renters or homeowners, or both? How long should these units be required to maintain their affordability?

The City should answer these questions prior to making significant amendments to the program to ensure that it is targeting the specific affordable housing needs of the community. These determinations should be made in coordination with City Staff, local housing advocates and professionals, elected officials, and the public. Once determined, the affordable housing provisions should, at a minimum, clarify the following requirements:

- i. *Minimum set aside.* Density bonuses for affordable housing typically require that at least 10 to 15% of the total number of units be set aside as affordable units. Some jurisdictions also change the minimum percentage required based upon the AMI target (for example, minimum set asides may be lowered if the units are targeted at an AMI not to exceed 30%). Additionally, select communities choose to base their minimums, not on units provided, but rather the total residential square footage of the development. In these cases, the minimum is typically around 8-10% of the total.
- ii. *Targeted income levels/Definitions of ‘affordable.’* Density bonus programs around the nation typically serve households earning up to anywhere between 80% and 120% of the AMI. Communities with a strong demand for affordable housing tend to have lower AMI maximums, while communities with less demand allow for higher AMI maximums.

Increasingly, many communities are requiring a mix of income levels below the established maximum AMI (example: 10% of affordable units must serve <50% AMI, 15% of affordable units must serve <65% AMI, with the remainder serving <80% AMI).

- iii. Comparable design, quality, amenities, and aesthetics. The provisions should mandate that the affordable units are integrated throughout the overall development and share a comparable design, quality, amenities, and aesthetics to market rate units.
- iv. Occupancy status. Typically, density bonuses are often limited to rental units. However, several communities do extend these bonuses to owner-occupied dwellings.
- v. Duration of affordability. The program should clearly articulate how long the units should remain affordable. The term of affordability typically begins for rental units when the unit is granted a certificate of occupancy and for for-sale units at the time a unit is initially sold. In the past, the required affordability term was often limited to a few decades; however, many jurisdictions are now seeking a minimum duration at or greater than 99 years to ensure their long-term affordability.
- vi. Implementation and monitoring requirements. The City and the housing provider must enter into an agreement to clearly outline the affordability requirements, monitoring procedures, and penalties.

On a related note, there has been some interest in ensuring that the City's residential bonus density program is consistent with the statutory provisions and definitions found within the Live Local Act (LLA). At this time, it is not recommended that the City amend the LDC to match the provisions of the LLA for many reasons, the most relevant of which are listed below:

- i. The LLA is still new and remains highly controversial—a recipe for future and ongoing statutory amendments, which will likely result in the City continuing to amend its LDC to remain consistent with provisions of the Act.
 - ii. The LLA does not necessarily reflect the affordable housing objectives of the City (see Recommendation #6.c). More specifically, the AMIs targeted by the Act may be determined to be inappropriate or insufficient for meeting the City's local housing needs.
 - iii. Local governments are preempted from narrowing the provisions of the LLA. As such, extensive regulations regarding its implementation are difficult and open the City up to potential legal challenges.
7. **Inclusionary Zoning Study**. Inclusionary zoning (IZ) is the concept of requiring and/or incentivizing developers to incorporate long-term affordable housing units as part of market rate housing developments. When IZ is required for market rate housing developments it is commonly referred to as 'mandatory;' alternatively, when it is optional, it is typically identified as 'voluntary.' As adopted, the affordable housing provisions of the City's residential density bonus program are likely considered to be a form of Voluntary IZ. Because the provision of affordable housing is not required under Voluntary IZ programs (particularly when other, less difficult, or expensive opportunities for receiving density bonuses exist), these programs often go unused. To combat this issue, some jurisdictions have decided to adopt Mandatory IZ programs.

These programs, if implemented successfully and within an appropriately competitive housing market, can be more effective at increasing the local supply of affordable housing than Voluntary IZ programs. If pursued by the City, the process outlined in Recommendation #6 above should be utilized to ensure that the process is transparent, fact-driven, and engages the public in a meaningful and equitable manner.

8. **Affordable Housing Incentive Plan.** The purpose of the Incentive Plan is to set out the deliberations and recommendations for monetary and non-monetary incentives targeting regulatory reform with respect to affordable housing including the evaluation of the established policies, procedures, ordinances, land development regulations and the comprehensive plan. Upon review of this document, it does not appear that any of the strategies outlined therein conflict or contradict with the recommendations provided as part of this exercise. In fact, it is recommended that the City continue to implement the provisions of the Incentive Plan in tandem with the LDC changes proposed in this document to ensure that the City maximizes its opportunities for increasing the local supply of affordable housing.

IV. HISTORIC PRESERVATION

The City of Pensacola has four designated local historic districts: **Pensacola** (locally designated in 1968, National in 1970), **North Hill** (1974/1983), Old East Hill (1984/NA), and **Palafox Historic Business** (1994/2016).

Each historic district has several implementing zoning districts. The Old East Hill district, for instance, has four applicable districts and North Hill has three. Each district has specific standards for preservation, rehabilitation, and new construction covering topics such as setbacks, building height, landscaping, parking, signs, fences, architecture, and even procedural. The Pensacola Architectural Review Board (ARB) is charged with the review of modifications and new development within those districts.

In addition to the standards contained in the LDC, the City has two documents that serve as resources and guides for owners of properties subject to historic district regulations, and guide Board members in their review and decisions. The **Preservation District Guidelines and Regulations**, created in 2014, and the **Seville Historic District Guideline Study**.

While the City has all the provisions in place to protect and guide new development within the historic and preservation districts, there is room for improvement. The reorganization and streamlining of the standards would help users navigate the code and better understand the regulations. Additionally, the City should consider applying for Certified Local Government (CLG) status. The CLG represents a partnership of the City with the State Historic Preservation Office and the National Park Service. The benefits of such designation include technical assistance and training, and eligibility to apply for federally funded CLG subgrants to conduct survey, planning, and National Register nomination projects.

The State Historic Preservation Office reviews applications for certification. The process includes demonstrating that the City already has a historic preservation ordinance that meets the CLG criteria, the establishment of a preservation review board or commission consisting of at least five members meeting certain qualifications and submitting the application to the State Historic Preservation Office. If the State Historic Preservation Office determines that all requirements have been met, a CLG agreement

is signed by the Mayor. The signed CLG agreement is then sent to the National Park Service requesting CLG certification.

Inspire recommends adding or clarifying the following provisions during the code update:

1. **Historic Preservation Commission and Officer.** The City currently relies on West Florida Historic Preservation, Inc. for certain historic preservation functions. The Architectural Review Board, which includes two members from that group, is the body in charge of implementing the historic preservation ordinance. We recommend renaming the ARB to Historic and Architectural Review Board (HARB). The membership, terms, and duties should be compared to the CLG guidelines to ensure compliance. If applying to become a CLG, the city will also need to designate a Historic Preservation Officer (HPO), which could be the City's historic preservation planner. Among that person's duties would be to approve Standard Certificates of Appropriateness.
2. **Process.** The code should clearly articulate the process for designating individual local landmarks and districts and how to obtain Certificates of Appropriateness (COA) for modifications, additions, new construction (if applicable), and demolitions. The COAs would fall into two categories, Standard for minor changes and Special for all others. Minor COAs are reviewed and approved by the HPO; special are reviewed by the HARB. This section should also include criteria for approval of designations and COAs, which should refer to the Secretary of Interior standards and the adopted design standards and guidelines for each district. All the procedural provisions should go in the development review chapter.
3. **District Designation.** Most communities treat historic districts as overlay districts. However, Pensacola designates them as stand-alone zoning districts. The narrative in the Zoning chapter should only include the establishment of each district, the general boundaries or map, permitted uses, and site dimensional standards (setbacks, height, lot coverage). That section can also cross-reference the standards section (in a separate chapter) and adopt district design guidelines by reference.
4. **Design standards vs. guidelines.** The design "guidelines" should be taken out of the code into stand-alone documents like the Preservation District Guidelines and Regulations. The design "standards" (measurable standards) should be in a separate chapter where they are consolidated so there is no repetition. For any features that vary from one district to the next, notes may be added. The difference between standards and guidelines is that the standards are requirements (shall) and the guidelines provide advice on how to meet the standards (do this, don't do that) and include numerous pictures and diagrams.

V. COASTAL RESILIENCY

As evidenced through recent efforts such as the Climate Action Recommendations and the ongoing Vulnerability Assessment, the City recognizes that coastal resiliency is essential for addressing the challenges posed by climate change, sea level rise, and extreme weather events. In response, the city has implemented a comprehensive approach aimed at safeguarding its coastal areas, infrastructure, and communities. Given the increased frequency and strength of severe weather events impacting Florida, it is crucial that the City continues this multifaceted approach to enhance resilience and mitigate the risks

associated with coastal hazards. Stringent building codes and zoning regulations that ensure that new construction and development projects in coastal areas adhere to resilient design standards should be at the forefront of these efforts.

The Florida Building Code mandates that structures be elevated above base flood elevations, employ resilient construction materials, and adhere to setback requirements to minimize vulnerability to flooding, storm surges, and other coastal hazards. In conjunction with building regulations, comprehensive zoning and land-use planning strategies can help manage coastal development and mitigate risks associated with erosion, flooding, and sea-level rise. Planning strategies could involve designating buffer zones, conservation areas, and coastal protection zones to preserve natural ecosystems, maintain biodiversity, and reduce exposure to coastal hazards, which may be further identified by the Vulnerability Assessment. This risk may be offset by strategically concentrating densities and intensities in less vulnerable areas. Specific planning/zoning tools that the city may want to start or continue implementing to become more resilient include:

- Standards for natural hazard mitigation such as green stormwater systems (bioswales, absorbent gardens, pervious surfaces)
- Preserving and continuing the City grid to facilitate safer and efficient evacuation from high risk areas
- Transfer of development rights for parcels which are in high risk areas
- Require the use of native and drought-tolerant plantings
- Encourage shared and reduced parking and the use of permeable paving or other techniques for groundwater recharge from off-street parking
- Require tree shading to reduce the heat island effect of parking lots
- Encourage Low Impact Design (LID) citywide, and make it a requirement in coastal areas

While hardening coastal development is important, it should be done in a manner which does not deter from the vitality of a place. Appropriate architectural standards should be incorporated to ensure mitigation strategies are balanced by aesthetically pleasing and appealing design considerations, particularly for ground/base floors within the floodplain and other non-habitable areas.

Effective stormwater management is another integral component. Even though many people struggle with the provision of stormwater facilities on redevelopment sites, the requirements to address stormwater are necessary given the City's susceptibility to heavy rainfall and storm surges. Managing stormwater runoff is crucial for reducing flood risk. Development regulations should address a variety of stormwater management practices, including green infrastructure, water retention, and drainage improvements, in both the public and private realms, to mitigate flooding and improve water quality,

Ensuring that these components work together in a complementary manner is key to striking a balance between economic growth and environmental sustainability.

VI. PROPOSED SCOPE AND ESTIMATED COST

See Exhibit 8, attached.

Edits	Reasoning
Move Laurel Oak/Darlington Oak from Large Tree to Medium tree class	These oaks have a shorter lifespan (usually 50-70 years) and once they reach protected size of 32" DBH they are end of life and usually poor condition Moving these oaks to the medium tree list will have them protected at a prime time in their lifespan. A medium tree is heritage size at 24" DBH. A 24" DBH Laurel/Darlington Oak is likely much healthier and less at risk than a 32" DBH.
Combine Eastern and Southern Red Cedar on one line Move white cedar and the now combined Red Cedars to small tree class	It is difficult to discern the difference between the 2. Combining them simplifies the list. Cedars are slow growing trees and very strong. All requests to remove end up being allowed unpermitted, as there are almost no cedars over 24" locally. Cedars in the small tree class will be heritage at 16" (which require a permit on residential property). This will help protect cedars in their prime in this area. This keeps companies who don't follow the rules out of the city so they'll stop creating violations. It also tells other tree companies that we mean business. If someone were to remove a 90" tree, the mitigation would only be 11 trees. That is a monumental tree, and mitigation with only 11 replant trees isn't sufficient If trees over 44" are removed, more severe mitigation should be required. Proposed new mitigation: 44"-60" - 11 trees. 61"-80" - 14 trees. 81"-99" - 18 trees. 100" + 25 trees.
AKA the mitigation shouldn't be capped at 11 replant trees	If I were to follow through with all the crape murder I see, I would have literally 100 more violations going. I feel this 1 species could make people despise the system Crape myrtles aren't even native. There is an abundance in this area. We should prioritize protecting native trees. I have seen maybe 3 of both combined by whole time here. Combining them would simplify the list.
Remove Crape Myrtle from Protected list altogether	
Combine red oak and white oak on 1 line item Add Camellia (Japonica) (and technically theres a few sasangua varieties that get large like a tree) to the small class in the protected list.	Camellias are Native to our area and the community cares for them deeply. It is a shame to see a large 50+ year old camellia be removed without a permit or mitigation
Free Pass after (3 for example) permits on a tree (if same resident) ??	If someone has gotten 3 or 5 permits on a specific heritage monster. We should give them discounted permits for pruning. They've shown their commitment for the care of the tree