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Sent Via Email

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Vice Mayor Christopher Graus

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Commissioner Mark Grill

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Commission Ward Friszolowski

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Commissioner Melinda Pletcher

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SUBJECT: Proposed Update to St. Pete Beach Comprehensive Plan

Dear Mayor Johnson, Vice Mayor Graus and Honorable Commissioners,

I am writing on behalf of Protect St. Pete Beach in regard to an agenda item for the October 11th City Commission meeting requesting consulting services to update the Comprehensive Plan. Protect St. Pete Beach asked that I share my thoughts on this matter.

I am a planner with over 45-years of Florida experience in the areas of environmental and land use planning including extensive work at the state and local levels of government as well as the private sector. During this time, I have worked with local governments throughout the state on growth and development issues including St. Pete Beach.¹

It is my strong recommendation that the scope of work for the plan update be broadened to fully evaluate the Comprehensive Plan - **including the future land use categories, densities and intensities of land use and critical development standards** - and then secondly, update it in a manner that protects community character and better positions St. Pete Beach to manage coastal storm risk and sea level rise. During this time a **“pause for planning”** is a wise and prudent measure in regard to significant zoning changes and conditional use requests until the Plan is refreshed.

The central goal of Protect St. Pete Beach is to protect the quality of life of residents. More specifically the group seeks to protect against overdevelopment, ensure that all hotel redevelopment projects are done in a way that protects quality of life, beaches, wildlife and environment, and that residents are protected from overcrowding, congestion and traffic.

¹ Professional qualifications are further identified below.

Agenda Item – Comprehensive Plan Update

The City Commission will consider authorizing consulting services to update the Plan. The scope of the update is not described but appears limited based on the requested modest budget of \$42,008.

I am nonetheless pleased to see the city moving forward with improvements to the Plan’s organization and readability, bringing it up to date with statutory changes and the Forward Pinellas Countywide Plan, and added emphasis on resiliency.² **Unfortunately these steps ignore the “elephant in the room” – future land use.**

Next, and of great importance, is that the task description provides for only legally minimal public participation – there would be no outreach to the public through surveys, open houses, community workshops, a citizens advisory committee or other means – instead it would be fast-tracked through a transmittal hearing with the Planning Board, a transmittal hearing with the City Commission and a City Commission adoption hearing.

The task’s **limited scope and minimal public participation are inadequate** with consideration to the 15-years that have passed since the Plan was the subject of a full public evaluation, the significant amount of redevelopment of large hotels that resulted from the prior emphasis on achieving that goal, fundamental policy conflicts within the plan and the awful reality of potential storm destruction and sea level rise. Major on-the-ground changes and knowledge about the economic and human risks of overdevelopment in hurricane and storm-surge-prone barrier islands require a full re-evaluation of the Plan’s goals, objectives and policies, and future land use, with an emphasis on input from the city’s residents.

Full Evaluation of the Plan is Long Overdue

Under Section 163.3191, Florida Statutes, each local government must evaluate its plan at least once every seven years to determine if amendments are necessary to reflect changes in state requirements. The law encourages local governments to comprehensively evaluate and as appropriate update their plans to reflect changes in local conditions.

The most recent Evaluation and Appraisal Report was prepared in 2007. The City of St. Pete Beach has had the opportunity to stop and fully think through the effectiveness of its Plan since that time but has not done so. That is, on June 27, 2016, the city simply sent an “EAR Notification Letter” to DEO stating that no amendments were necessary to update the plan.³

The statewide schedule for Evaluation and Appraisal Reports shows that St. Pete Beach is next due to evaluate its Plan by July 1, 2023. **It is critically important that this opportunity not be brushed aside as well, in favor of the limited proposal before you.**

² As described during the City Commission meeting on November 10, 2021.

³ Per DEO FloridaPapers Data Base.

The Plan Badly Needs a Thorough Update

The City of St. Pete Beach's Comprehensive Plan – including its land use plan - is outdated, lacks a clear direction as a result of conflicting provisions, and not responsive to today's issues, realities and data. Conditions have changed and the Plan needs to change with them.

Certainly St. Pete Beach is a small built-out community situated on a low-lying barrier island where redevelopment of aging tourist accommodations is a critical issue. The replacement of traditional small-scale hotels with residential condominium towers has been a long-term concern. The Plan attempts to tackle this issue by promoting highly intense non-residential redevelopment.

For instance, the Resort Medium Future Land Use Category allows up to 30 transient units per acre, the Resort Facilities Overlay generously allows transient units based on a multiplier of underlying residential density, General Commercial allows 40 lodging units per acre, and the Eighth Avenue district allows 50 lodging units per acre.

As the prime example I will focus on the Large Resort Character District within the Gulf Boulevard Community Redevelopment Area. The justification statement for Large Resort represents an over-emphasized, broad-brush discussion of the economic benefits of large-scale hotel related redevelopment that fails to reflect the substantial human, economic and other costs of concentrating population and massive structures in a Coastal High Hazard Area.

The underpinnings of the economic discussion rely on information from 2007 and earlier. The economic and tax revenue benefits that might specifically accrue to local residents from this planning strategy are not itemized. The requisite scale and intensity of redevelopment projects is not justified.

I was surprised to discover up to 75 temporary lodging units per acre are identified as allowable within Large Resort, that up to 85% of a site can be covered with impervious surfaces, and building heights of 116 feet are possible.

How is this magnitude of redevelopment suitable given the unique character of St. Pete Beach? How is it appropriate to allow up to 85% impervious surface on a fragile barrier island? How do the potential building heights not invade the privacy and block scenic vistas and sunset views traditionally enjoyed by your residents?

The Exceptionally High Intensity of the Large Resort Design District Collides with other Aspects of the Plan

For example, the Plan identifies important citizen input and principles for its redevelopment plan including "There is a strong community objection to high density unmanaged overdevelopment of our coastal Gulf community that will further degrade infrastructure and public services" and "There is a strong desire to protect the quiet character of existing residential neighborhoods from encroachment and overdevelopment of non-residential uses."

Goal 1 states that the City shall ensure that the residential character of the City of St. Pete Beach is maintained and protected. Objective 2.1 indicates that the integrity of existing residential neighborhoods will be maintained.

The Comprehensive Plan has traded one threat for another – it purports to protect residential character and protect the traditional tourist accommodation industry from being supplanted by high density residential towers. However, the redevelopment strategies, if zealously pursued, may set the city on a pathway where it's residential character will be degraded and traditional tourist accommodations replaced by massive hotel complexes.

As you know many of the redevelopment opportunities provided by the land use plan emerged from winding, multistep litigation. The unfortunate reality is the remarkably high intensity allowed for temporary lodging units conflicts with imperatives in the Plan to maintain and protect residential character making still further conflict inevitable. This is not good for anyone.

Ample Public Participation is Essential to Evaluating and Updating the Comprehensive Plan

In my experience, the communities which regularly evaluate and update their plans and do so with a high level of public involvement achieve the most planning success. It is through grass roots participation that issues are best understood and enduring community consensus achieved.

A full evaluation of the City's Plan would, of necessity, include technical steps such as documenting trends and conditions, measuring progress toward objectives and identifying policies that have performed well and those which are obsolete or ineffective. In the bigger picture though it is the formulation of a consensus vision of the future and a community's long-range goals that drive a planning process.

I suggest the city form a **Citizen Advisory Committee** to work with staff, the Planning Board and City Commission to complete a full evaluation and update. One model to consider is your Beach Stewardship Committee.

Coastal Storm Risk and Sea Level Rise

The City of St. Pete Beach is highly vulnerable to coastal storms, wind damage and salt water surge. There is much to be learned from Hurricane Ian including its immediate devastation, short- and long-term recovery, consequences for public infrastructure and impact on the fundamental economics of redevelopment. We find ourselves in a trend of more frequent hurricanes and hurricanes which rapidly intensify to reach the most powerful levels.

It is not just the threat of coastal storms; sea level rise profoundly changes the planning equation for St. Pete Beach. Pinellas County has published the following finding about potential sea level rise⁴:

⁴ <https://floodmaps.pinellascounty.org/pages/sea-level-rise>

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Based upon a thorough assessment of scientific data and literature on SLR, the Tampa Bay Climate Science Advisory Panel (CSAP) concludes that the Tampa Bay region may experience SLR somewhere between 11 inches to 2.5 feet in 2050 and between 1.9 to 8.5 feet in 2100.

It critically important, at this point in time, that the City Commission ask itself how intensive redevelopment on a barrier island makes sense in the context of a new era of coastal storms and sea level rise? These threats must be viewed as game changers and justify still further a full evaluation of the Plan.

Pause for Planning

I am aware of an anticipated request to allow a massive expansion to the Tradewinds Beach Resort and that other large-scale transient lodging redevelopment proposals are forthcoming. The position of the City Commission on these matters will be on profound importance to the future well-being of St. Pete Beach.

In the circumstance I have outlined – the City’s Comprehensive Plan (including the land use plan) is outdated, conflicted and not responsive to today’s issues - my recommendation is that the City defer large-scale redevelopment requests until such time as the Plan is fully evaluated and updated. **A “pause for planning” is a wise and prudent measure in regard to significant zoning changes and conditional use requests until the Plan is refreshed.**

I hope this letter is helpful and that the City Commission will exercise its leadership role by getting out ahead of these issues as suggested.

Sincerely,



Charles Gauthier, FAICP

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	Mr. Alex Rey, City Manager	arey@stpetebeach.org
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	Ms. Michelle Gonzalez, AICP, Community Development Director	mgonzalez@stpetebeach.org

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Vita – Charles Gauthier, FAICP

I have worked in Florida for over 45-years as a professional planner in the areas of growth management, land use planning, environmental planning, land use regulation, zoning, and site planning. I have been a member of the American Institute of Certified Planners since 1988; in 2011, I was inducted as a Fellow for outstanding contributions to the public interest, the highest achievement available at a national level.

At the local level of government, I served as Chief of Long Range Planning and Manager of Planning for Collier County during preparation of the 1989 Growth Management Plan. As Lee County's Zoning Manager, I presented over 300 re-zoning requests to the Board of County Commissioners. I have represented private sector clients seeking plan amendment and development approval on behalf of major consulting firms. For 17-years I served as a senior state official with the Florida Department of Community Affairs overseeing local government implementation of statutory requirements for comprehensive planning, large-scale development, and land development regulation.

My expertise is supported by extensive engagement in land use planning issues on a statewide basis including appearing before dozens of county commissions and city councils, addressing legislative committees and the governor and cabinet, speaking at over 100 conferences and workshops, executing over 5,100 compliance decisions on comprehensive plan amendments for the State of Florida, and having been qualified as a planning expert in over 35 legal proceedings.

For the past nine years I have provided expert planning services as Charles Gauthier, FAICP, LLC. My clients have included counties, municipalities, homebuilders, industry, community associations, public interest groups, landowners, and individuals. I have provided services in Walton, Bay, Alachua, Lake, Hernando, Pasco, Pinellas, Sarasota, Lee, Collier, Hendry, Martin, Palm Beach, Broward and Monroe Counties.