



November 20, 2024

Via email

Planning Board
City of Key West
1300 White Street
Key West, FL 33040

RE: Public Comments regarding November 21, 2024 Planning Board Meeting

Dear Planning Board Members,

Last Stand of the Florida Keys is a non-profit organization established to preserve the Florida Keys and ensure a sustainable future for all. We advocate for promoting, preserving, and protecting the quality of life in the Florida Keys, with particular emphasis on the natural environment.

Agenda Items # 2 and # 3

Last Stand supports the Planning Department's recommendations regarding the proposed amendments to the Land Development Regulations and the Comprehensive Plan concerning Workforce Housing. We commend the staff for their efforts and continued collaboration with stakeholders to consider their concerns and address Key West's critical affordable housing challenges.

Last Stand fully supports the adoption of the Non-Residential or Commercial Workforce Housing changes. These changes are an important step toward ensuring that commercial developments and redevelopments contribute to addressing the City's most critical problem, increasing available affordable housing. We agree with the increase in

the Payment-In-Lieu fee from \$200,000 to \$400,000 per affordable housing unit, as this change will better reflect the actual costs of developing affordable housing in Key West.

Further, we believe the City's efforts to enforce existing affordable housing requirements deserves further study. A thoughtful, consistent, and effective enforcement regime is critical to ensuring that all inhabitants of existing affordable housing remain qualified. Improving these enforcement efforts is imperative to reducing the shortfall in affordable housing stock.

We strongly endorse the recommendation to establish a working group to continue refining and guiding future amendments to the City's Workforce Housing requirements. The complexities of affordable housing require ongoing collaboration, and creating a working group will provide a platform for continued input from community stakeholders, including residents, developers, and advocacy groups. The working group could play a crucial role in ensuring that future adjustments to the ordinance are well-informed, responsive to community needs, and aligned with our shared goals of sustainability and inclusivity as well as complying with City's unique designation as an Area of Critical State Concern.

Agenda Item # 4

We respectfully oppose Agenda Item #4 which proposes a competing amendment to the City of Key West's Land Development Regulations (LDR). This amendment seeks to incorporate aspects of the Florida Live Local Act (LLA) into the City's zoning code with many far-reaching potential negative implications for the entire island.

We are deeply concerned that this proposal will undermine the protections that ensure the continued health, sustainability, and character of our neighborhoods and diminish the quality of life we value as Key West residents.

Specifically, the proposed changes contain several provisions that we find alarming:

1. **Reduction of Setback Requirements:**
2. **Increased Height Limits:**
3. **Elimination of Performance Standards: Density and Parking Reductions:**
4. **Elimination of Public Hearings:**

These provisions starkly contrast with the guiding principles outlined in the Area of Critical State Concern (Section 29-36.003[9]), emphasizing the importance of balancing development with protecting the community's unique environment, historic character, and resources.

Given these significant concerns, we stand with the Planning Department in urging you to reject the proposed amendments in Item # 4. The public deserves more time to consider and provide input on these far-reaching changes. Careful consideration must be given to the long-term implications of these proposed changes for our community and the principles of sustainable development.

We appreciate the Planning Department's leadership on these issues and look forward to the ongoing discussions and working together to ensure that Key West remains a place where all residents can thrive.

Respectfully

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The Last Stand Board

Last Stand is a non-profit organization of volunteer citizens interested in preserving the Florida Keys' unique quality of life and fragile, beautiful natural environment. We have worked tirelessly since 1987 to protect Key West and the Florida Keys.

Last Stand • P.O. Box 146 • Key West, FL 33041 www.keyslaststand.org