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VIA ELECTRONIC MAIL

July 22, 2024

Katie Halloran, Planning Director
City of Key West Planning Department
1300 White Street
Key West, FL 33040

Re: **Text Amendment to the Land Development Regulations**

Dear Katie,

Due to a prior work commitment, I am unable to attend the July 23, 2024, Special Planning Board Meeting to provide public comment. I wanted to share a few comments/thoughts for the Board's consideration for this important topic.

From a practical sense in the private sector, the City of Key West has seen little to no development of workforce housing. To my knowledge, there is one pending private workforce development with a few workforce designated units which has met substantial resistance throughout the process. My colleagues, Bart Smith and AJ Davila, provided thoughtful and informative planning commentary on this topic for the Board's consideration and have proposed an alternative solution which focuses on the commercial sector only, which was the original request of the City Commission.

The current residential inclusionary regulations have failed to provide a meaningful addition to the workforce housing stock. Increasing the threshold for residential development will provide an inherent disincentive for residential redevelopment. Redevelopment of residential properties provides positives to the City, including, but not limited to site upgrades and decreases in existing non-conformities. Instead of a higher regulatory barrier, incentives for creation of workforce housing would have more of a net impact on potential workforce development.

Throughout the City, property owners have excess units they are holding onto from, for example multi-unit developments being downsized or converted to single family. Allowing for the transferability of excess BPAS Units, which is commonplace within Monroe County, outside of the City of Key West, would provide a mechanism for commercial landowners to obtain units needed to meet the proposed commercial inclusionary regulations. As there is currently no future BPAS cycle planned, there is a need for more BPAS units within the City and allowing the free market to provide those, similar to the processes various jurisdictions outside the City of Key West

follow¹. With the currently proposed text amendment, it may be time to include the transferability of excess units which will add to the housing unit supply.

As always, I appreciate your time and consideration.

Very Truly Yours,



Gregory S. Oropeza

¹ As an example, the City of Marathon has an administrative process to move units throughout the City of Marathon.