

STEARNS WEAVER MILLER
WEISSLER ALHADEFF & SITTERSON, P.A.

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February 20, 2019

Key West Planning Board
1300 White Street
Key West, Florida 33040

Dear Planning Board Member:

The Key West Planning Board ("**Board**") is scheduled to hold a public hearing on February 21, 2019 regarding a variance application ("**Variance Application**") filed by Trepanier & Associates, Inc. ("**Applicant**") for property (Real Estate #0002280-000100 & 101) located at 2407 North Roosevelt Boulevard ("**Subject Property**"). This letter is submitted on behalf of Banana, LLC ("**Banana**") and KW26 LLC ("**KW26**"), who own land to the west of the Subject Property as referenced in the attached location map (**Attachment "1"**). As further discussed herein, Banana and KW26 are each an *Aggrieved or Adversely Affected Party*, as that term is defined by s. 163.3215(2), Florida Statutes. As Planning Director for Stearns Weaver Miller Weissler Alhadeff & Sitterson, I have conducted a professional evaluation at the request of Banana and KW26 to determine whether the Variance Application is consistent with the Key West Comprehensive Plan and the Key West Code of Ordinances ("**Code**"), including the Key West Land Development Code. Banana and KW26 object to the Variance Application based on the findings set forth in this letter and respectfully request that the Board deny the Variance Application.

I. Professional Background

I am a certified, professional planner with 33 years of experience in Florida, including 16 years with the Florida Department of Community Affairs ("**DCA**") where I served as the Area of Critical State Concern ("**ACSC**") Administrator. I served as a Planner at the DCA Field Office in Key West starting in 1988 and as the Florida Keys ACSC Administrator from 1990-2004, including a total of seven years (1988-1995) at the DCA Field Office. During this period, I lived in Key West and the lower Keys from 1988-1995 and regularly attended variance hearings in Key West. This letter sets forth my professional findings and expert opinions regarding the Variance Application as referenced in the attached affidavit (**Attachment "2"**). Please refer to my attached resume (**Attachment "3"**) for additional background on my professional experience.

II. Variance Application Deficiencies

The Variance Application requests a variance to:

"Permit 30 proposed auto spaces and 78 bike/scooter spaces in lieu of Secs. 108-572, 108-641 and 122-1473."

This description of the requested variance is not sufficient because it fails to specify the actual variance requested (i.e., the requested reduction in the minimum number of parking spaces required by the Code).

Moreover, as summarized below, the Variance Application is incomplete, lacks critical information necessary to properly quantify the requested variance, does not provide sufficient information for the Planning Board to make findings to grant the variance, and includes irrelevant and contradictory information.

1. The Variance Application form requires the Applicant to “List and describe the specific variance being requested.” The Variance Application does not specify the minimum number of required automobile parking spaces and bicycle/scooter parking spaces required by Code. This determination is necessary in order to specify the exact variance, which should calculate the difference between the minimum number of parking spaces required by Code versus the number requested by the Variance Application.
2. The Variance Application must define the proposed development in order to allow for a calculation of the minimum number of parking spaces required by Code. The “*Site Data Table*” which is part of the Variance Application form includes a bubble note stating, “Please see attached.” Proposed Site Plan C-1.0 includes a table, but it has been re-formatted as compared to the *Site Data Table*, and does not present the development program. It should identify the applicable parking standard for each existing and proposed use and specify the parking variance requested for each land use based on Code Section 108-572. Instead, for Parking Auto and Bike/Scooter (first column), it states, “See Parking Sec. 108-244 below” and compares the existing and proposed number of parking spaces. Code Section 108-244 addresses parking design and does not address the minimum number of required parking spaces. The Variance Application fails to define the proposed development program and fails to calculate the required parking for each land use component of the proposed development.
3. The Trip Generation table in Footnote 2 shows the proposed use as including 100 seats. However, the architectural plans for the Marina Clubhouse building graphically depicts 96 seats (12 tables with eight seats each) on the first floor and a note stating “148 persons occupancy.” The architectural plans also show nine picnic type tables on the second floor, which would provide seating for at least six persons per table. This would total to 150 seats, which is also the minimum number of seats required for a COP4 license to serve alcoholic beverages. Footnote 2 contradicts the architectural plans regarding the number of seats, and the architectural plans are ambiguous as to whether the 148 person occupancy is for just the first floor (counting seats and standing patrons) or is intended to include the second story enclosed area. Obviously, since at least 150 seats are graphically shown, it may be inferred that the 148 person occupancy applies only to the first floor. The second floor graphic does not include any notes regarding the number of seats, square footage or occupancy.
4. Proposed Site Plan, Sheet C-1.0, shows a proposed “consumption area” of only 1,500 square feet, which contradicts the square footages shown on the architectural plans, which show “Seating Area 2,220 S.F.” on the first floor and show seating areas on the second floor without a square footage estimate.
5. The architectural plans show a “service bar” on the second floor, but do not show seating immediately along the service bar. This should be clarified.
6. The Variance Application responds to only four of the seven variance review standards set forth in Code Section 90-395. Moreover, the responses that are provided are inappropriate and non-responsive to the criteria.

III. Calculation of Required Parking Spaces

Neither the Variance Application nor the staff report calculates the required parking spaces for the Marina Clubhouse building. It is important to classify the proposed uses for the purpose of determining the minimum number of required parking spaces, as necessary to quantify the requested variance (i.e., the difference between the minimum number of parking spaces required by Code for each existing and proposed land use and the number of parking spaces proposed for each land use). This is particularly important for the Marina Clubhouse building, which includes a deli, ship store, seating areas and restrooms on the first floor and a service bar, seating areas, and an “open recreation area deck” on the second floor as referenced on the architectural plans included in the Variance Application.

The classification of the deli, ship store, service bar, seating areas and open recreation area deck depends on whether the general public will be allowed entry. If Planning Board includes a condition to prohibit the general public, then these uses could be considered as a private club pursuant to Code Section 108-572(8). However, if the general public will not be prohibited from entry, then these uses should be considered as retail and restaurant uses. The following tables compare the minimum required parking for the Marina Clubhouse building as a Club use (Table 1) and as a restaurant/retail use (Table 2).

Table 1. Minimum Required Parking for Marina Clubhouse Based on Condition Prohibiting Entry by General Public.

Use	Code Section 108-572(8)	Proposed Square Footage of Main Assembly Area (measured from architectural plan)	Number of Proposed Seats	Minimum Required Auto Parking	Minimum Required Bike/Scooter Parking
Club Use	One space/five seats or one space/150 S.F. of main assembly area.	2,220 S.F. (first floor service area) 1,150 S.F.(second floor enclosed service area). 1490 S.F.(second floor outdoor deck service area) Total 4,860 S.F. ¹	150	150 seats/5 = 30 spaces. 4,860 S.F./150 = 32.4 spaces Code doesn't specify that the greater of the two calculations would control. At least 30 spaces would be required.	10% of minimum required auto spaces.
Required Minimum Total				30 parking spaces	3 bike/scooter spaces

1. Ship Store, Deli and Restrooms are not included since those would not be open to the public and would not constitute the main assembly area. If a condition is included to prohibit service and consumption on the outdoor deck, then this area could be removed from the calculations.

Table 2. Minimum Required Parking for Marina Clubhouse If Condition Is Not Imposed to Prohibit General Public Entry.

Use	Code Section	Proposed Square Footage of Main Assembly Area (measured from architectural plan)	Minimum Required Auto Parking	Minimum Required Bike/Scooter Parking
Deli/Service Bar Service/Consumption Areas	109-572(9) 1 space/45 S.F.. of serving and/or consumption area.	2,200 S.F. (first floor) 1,150 S.F. (second floor enclosed area not including ship store, deli or restrooms. 1490 S.F. (second floor outdoor deck) Total 4,860 S.F. ¹	4,860 sq.ft./45 = 108 spaces	25% of required auto spaces.
Ship Store	109-572(16) 1 space/300 S.F.	258 S.F.	258/300 = .9	25% of required auto spaces.
Required Minimum Total			109 spaces	27 bike/scooter spaces

1. If a condition is included to prohibit service and consumption on the outdoor deck, then the outdoor deck area could be removed from the calculations.

The parking calculations for the Marina Clubhouse Building are in addition to the minimum parking required for the Main Building. As calculated in the staff report, the 74 liveboard boats and the uses in the Main Building require a total of 103 off-street parking spaces and 25 bicycle spaces. Table 3 presents the minimum offstreet parking required for both buildings and the liveboard boats.

Table 3. Minimum Required Off-Street Parking and Required Variance

Building/Use	Minimum Required Off-Street Parking	Proposed Spaces	Required Variance for Proposal
Liveboard Boats	74		
Main Building	29		
Marina Clubhouse with Public Allowed	109		
Marina Clubhouse without Public Allowed	30		
Total Required Parking with Public Allowed in Clubhouse	212	30	182 parking space variance (i.e., reduction in required parking)
Total Required Parking without Public Allowed in Clubhouse	133	30	103 parking space variance (i.e., reduction in required parking).

If a condition is not adopted to prohibit the public entry, then the service/consumption area of the Marina Clubhouse Building must be considered as a restaurant/bar. This results in a total of 212 required parking spaces and a resulting request for a variance (i.e., reduction) of 182 parking spaces. If the public is prohibited from entry to the Marina Clubhouse Building, then the service/consumption area could be considered as Club use and a total of 133 parking spaces would be required, resulting in a request for a variance (i.e., reduction) of 103 parking spaces.

IV. Variance Criteria (Code Section 90-395)

Code Section 90-395(a) sets forth seven review standards or criteria that the Planning Board must find are met in order to grant a variance. However, the burden is on the Applicant to provide sufficient information to support the Variance Application. As demonstrated above, the Variance Application fails to provide minimum required information to demonstrate compliance with the review standards. The following findings address each review standard and are consistent with the findings reached by staff as presented in the staff report; to wit, the Variance Application is not consistent with the review standards and should be denied.

- 1. Existence of special conditions or circumstances. That special conditions and circumstances exist which are peculiar to the land, structure or building involved and which are not applicable to other land, structures or buildings in the same zoning district.**

Finding: The Variance Application essentially asserts that the Subject Property is vested from the Code as related to intensity and related minimum parking requirements by a 1995 letter from then City Attorney, Diane Coven. The Variance Application includes a footnote indicating that the referenced letter is attached, but the Variance Application downloaded from the City's portal does not include the referenced letter. In any case, if the Applicant believes that the Subject Property is vested, then the Applicant should pursue a vested rights determination. The Planning Board does not have jurisdiction to issue a vested rights order, and a public hearing on the Variance Application is certainly not the proper venue to make a vested rights determination. Notably, the "previous uses" cited by the Variance Application as justification for the requested variance were abandoned many years ago, and the Applicant has provided no documentation of a vested rights order that is currently in effect.

The Variance Application fails to demonstrate that special conditions and circumstances exist that are peculiar to the Subject Property. The Variance Application seeks to expand a nonconforming use, which is a use that is not authorized as a permitted use in the Conservation Future Land Use Category and Conservation Zoning District. The existing structure is currently one story and is occupied by office uses according to the architectural plans included in the Variance Application. The Variance Application would facilitate a change in use to another nonconforming use that is not a permitted use and would expand the nonconforming use to both stories. It also seeks to expand a nonconforming structure, which currently does not conform to floodplain management requirements and does not conform to the limited types of structures (i.e., docks, piers, etc.) allowed in the Conservation Future Land Use Category and Zoning District. Many non-conforming uses and conditions exist in Key West. As such, these conditions are certainly not unique to the Subject Property.

2. **Conditions not created by applicant. That the special conditions and circumstances do not result from the action or negligence of the applicant.**

Finding: Staff is correct that the request for a variance is predicated on the Applicant's proposal to intensify and enlarge a nonconforming use. As such, this situation has occurred as a result of the Applicant's proposal.

3. **Special privileges not conferred. That granting the variance requested will not confer upon the applicant any special privileges denied by the land development regulations to other lands, buildings or structures in the same zoning district.**

Finding: The Variance Application would clearly confer special privileges to expand a nonconforming use and nonconforming structure by reducing the applicable parking code standard by 77% (if condition prohibits public entry) or by 86% (if condition does not prohibit public entry).

4. **Hardship conditions exist. That literal interpretation of the provisions of the land development regulations would deprive the applicant of rights commonly enjoyed by other properties in this same zoning district under the terms of this ordinance and would work unnecessary and undue hardship on the applicant.**

Finding: The Land Development Regulations do not deprive the Applicant of rights commonly enjoyed by other properties in the Conservation and Commercial General land use categories, and do not work an unnecessary and undue hardship on the Applicant.

5. **Only minimum variance granted. That the variance granted is the minimum variance that will make possible the reasonable use of the land, building or structure.**

Finding: The existing use of the Subject Property makes reasonable use of the land and structures. A variance is not necessary to achieve this outcome.

6. **Not injurious to the public welfare. That the grant of the variance will be in harmony with the general intent and purpose of the land development regulations and that such variance will not be injurious to the area involved or otherwise detrimental to the public interest or welfare.**

Finding: The grant of the requested variance would be injurious to the area and detrimental to the public interest and welfare by facilitating the intensification and enlargement of a nonconforming use and nonconforming structure in contravention to the Key West Comprehensive Plan, including but not limited to the following:

- Future Land Use Objective 1-1.1/Policy 1-1.1.15 which does not allow the proposed uses and structure in the Conservation Land Use Category;
- Future Land Use Objective 1-1.9/Policy 1-1.9.2 which requires the City to enforce the provisions of the Comprehensive Plan and Code; and
- Future Land Use Objective 1-1.11 and its implementing policies, which require protection of natural resources.

Similarly, the grant of the variance would facilitate development in violation of Code Chapter 122, Article II, which seeks to eliminate rather than perpetuate and expand nonconforming uses and

structures. Code Section 122-32(d) prohibits enlargement and intensification of nonconforming uses, while Code Section 122-32(g) prohibits enlargement and intensification of nonconforming structures. Finally, Code Section 122-32(e) specifically prohibits a change from one nonconforming use to another nonconforming use, unless the Planning Board makes certain findings, including specifically that “the change of use would not intensity the use of the premises by increasing the need for parking...” (emphasis added).

7. **Existing nonconforming uses of other property not the basis for approval. No nonconforming use of neighboring lands, structures, or buildings in the same district, and no permitted use of lands, structures or buildings in other districts shall be considered grounds for the issuance of a variance.**

Finding: The Variance Application does not cite to nonconforming conditions on other properties in the Conservation Zoning District or cite to permitted uses in other Zoning Districts as the basis for the request. This criterion is not triggered.

Based on the finding above and as determined by the staff report, the Variance Application does not meet the criteria specified above and should be denied. Again, it must be emphasized that it is the Applicant’s burden to provide a complete Variance Application to allow the Planning Board to reach the findings required for the granting of the requested variance. Code Section 90-392(a) states, in part:

A completed application shall include the application form, the fee and all required supplemental information necessary to render determinations related to the variance request.

The Variance Application instead presents a vesting theory that is not supported by documentation in the Variance Application and that would not be relevant to the review of the variance request in any case. If the Applicant contends that no additional parking is required for the proposed development based on a vested rights claim, then it should seek a vested rights order in a different venue. The Planning Board must make its findings based on competent substantial evidence in the record as related to the applicable review standards specified in Code Section 90-395. Finally, the Planning Board must find that the granting of the variance would not be contrary to the public interest. On its face, the Variance Application fails to demonstrate consistency with the Comprehensive Plan, the Code and the required criteria for granting a variance. As such, it would be contrary to the public interest to approve the requested variance.

V. Standing as Parties

As previously noted, Banana and KW26 are each an *Aggrieved or Adversely Affected Party* and should each be accorded standing at this quasi-judicial hearing to allow for a reasonable period of time to present objections and to cross examine City staff and the Applicant in regard to the Variance Application. Due to an unavoidable conflict, I am not able to participate at the hearing. However, I have coordinated with Ms. Ginny Stones, who will attend and represent Banana and KW26 at the public hearing. Banana and KW26 would be adversely affected by the requested variance to a much greater degree than the public at large due to the proximity of the Banana and KW26 properties to the Subject Property. Adverse impacts would result from the increased intensity achievable at the site if the Variance Application were approved. These adverse impacts would include, but are not limited to, traffic impacts, overflow parking and land use incompatibility.

Key West Planning Board

February 20, 2019

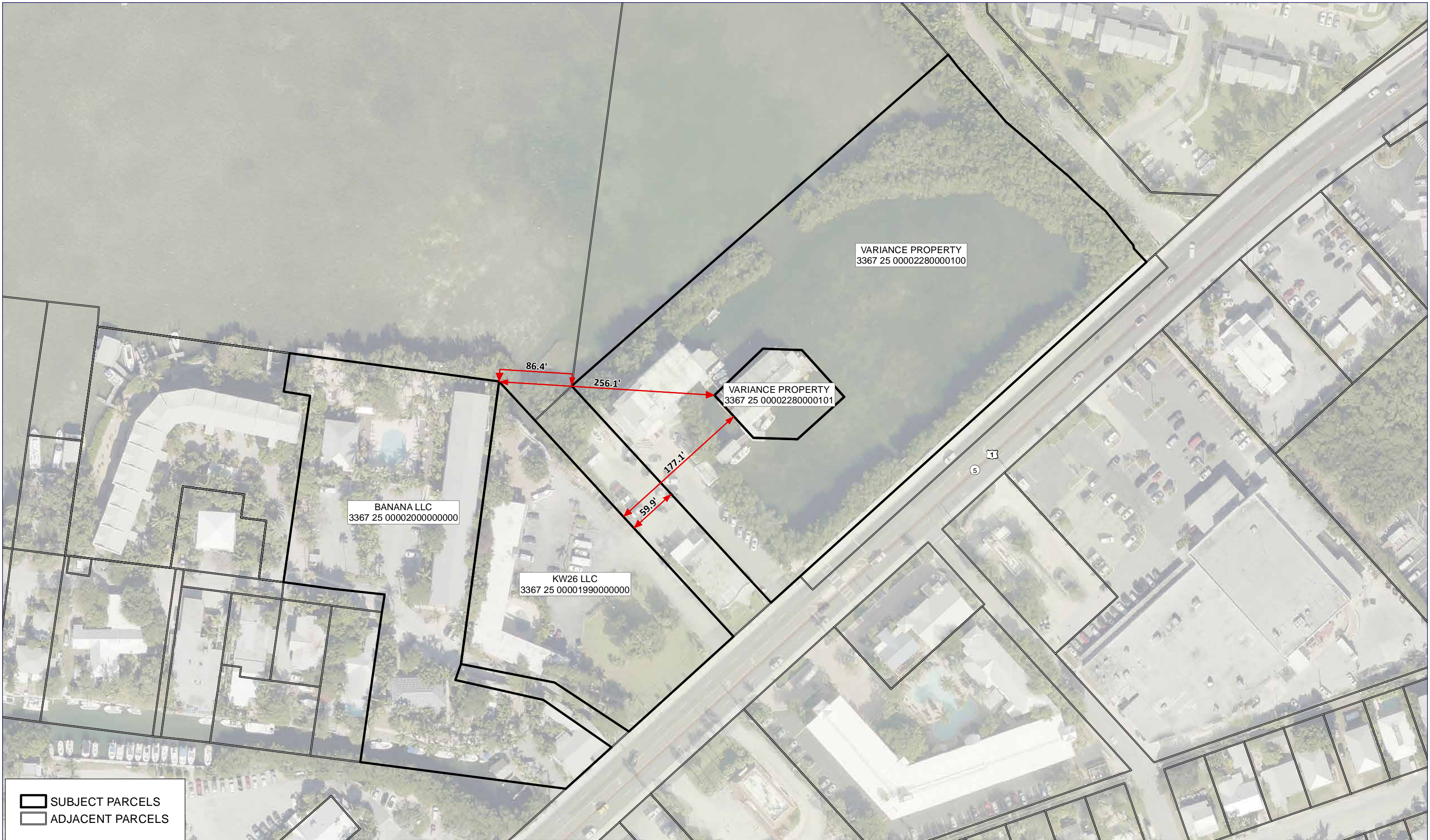
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Thank you for the opportunity to review and evaluate the Variance Application. Based on the findings set forth in this letter and on behalf of Banana and KW26, I urge the Key West Planning Board to deny the Variance Application.

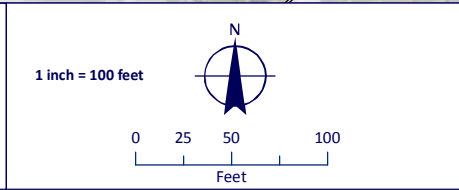
Sincerely,



Kenneth Metcalf, AICP
Planning Director



TITLE:
Attachment "1"



PROJECT:
**Banana LLC and KW26 LLC
 Distance from Variance Property**
 Monroe County, Florida

STEARNS WEAVER MILLER

MAP DATE: Feb-20-2019 BY: CP Smith

ATTACHMENT "2"

AFFIDAVIT

STATE OF FLORIDA)
COUNTY OF LEON)

BEFORE ME, the undersigned authority, this day personally appeared Kenneth Metcalf who, after being first duly sworn, deposes and says to the best of her knowledge and belief:

1. I am over the age of eighteen (18) and competent to make this affidavit.
2. I prepared the letter with my signature ("Letter"), dated February 20, 2019, to the Key West Planning Board regarding the Variance Application for 2407-2409 N. Roosevelt Boulevard.
3. All findings and expert opinions set forth in the Letter are my own.

FURTHER AFFIANT SAYETH NAUGHT.


Kenneth Metcalf

The foregoing instrument was sworn to and subscribed before me on this 20th day of February, 2019, by Kenneth Metcalf, who is personally known to me.

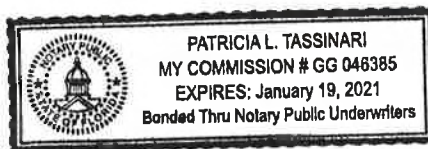


Notary Public, State of Florida

Print or Stamp Name:

Commission No.:

My Commission Expires:



ATTACHMENT "3"

KENNETH METCALF, AICP

106 East College Avenue, Suite 700
Tallahassee, Florida 32301

PROFESSIONAL EXPERIENCE

DIRECTOR OF PLANNING

Stearns Weaver Miller, P.A.
August 2014 – Present

DIRECTOR OF PLANNING SERVICES

Greenberg Traurig, P.A.
October 2004 – August 2014

Provide professional planning services to assist private sector and governmental clients with project development, community planning and regulatory compliance. Develop land use planning and entitlement strategies for private sector clients, ranging from feasibility analysis/conceptual project planning through final project implementation and monitoring. Assist governmental clients in developing community planning strategies, public project planning, program evaluation and compliance strategies related to Florida's growth management and regulatory requirements. Advanced policy and technical analysis related to all aspects of growth management and development planning.

Planning Services:

- Due Diligence, Concept Development and Feasibility Analysis
- Project Entitlement and Permitting Compliance
- Project Management
- Comprehensive Planning and Growth Management Strategies
- Developments of Regional Impact - new DRI applications, DRI restructuring, management, annual reports, development agreements and compliance
- DRI Alternatives - binding letters, vesting analysis and Regional Activity Centers
- Area of Critical State Concern - ROGO analysis, compliance and feasibility/redevelopment analysis
- Area-wide Planning – DRIs, New Towns, Urban Villages, Sector Plans and Stewardship Plans
- Specialized Planning - Campus Master Plans, Airport Master Plans, Military Base Compatibility, Redevelopment/CRA Plans, Neighborhood Master Plans and Entertainment Districts
- Land Development Regulations/Zoning Codes
- Sustainability/Smart Growth Strategies – TNDs/New Urbanism, TDR/PDR programs, transect/form-based codes, performance zoning, climate/carbon/greenhouse gas/LEED programs
- Negotiations and Dispute Resolution
- Compliance Evaluation and Expert Witness Testimony
- Planning Studies/Policy and Technical Analysis
 - Land Use Need/Urban Sprawl Evaluation
 - Population Projections and Modeling
 - Financial Feasibility/Capital Improvement Planning
 - Infrastructure and Water Supply Planning
 - School Planning and School Concurrency
 - NEPA Analysis
 - Coastal Permitting (CCCLs, State Lands leases/easements, etc.)
 - Coastal Policy/Hurricane Evacuation and Shelter Demand Modeling
 - Marina Siting Analysis and Manatee Mortality Modeling
 - Corridor Analysis
 - Transportation Studies/Concurrency Management and Alternative Concurrency Strategies
 - Mobility Plans and Multimodal Strategies
 - Historic Preservation Planning

REGIONAL PLANNING ADMINISTRATOR

Department of Community Affairs

January 1995 - October 2004

Directed staff of 15 managers, planners and biologists in implementing Florida's growth management programs within the southeast Florida region (Indian River to the Florida Keys). Directed all Division functions and programs within the region, including administration and implementation of the Growth Management Act, Developments of Regional Impact (DRI), Areas of Critical State Concern (ACSC) and Federal coastal consistency. Formulated Department policy, implementation strategies and legislative proposals regarding growth management and programmatic requirements. Led Department compliance and settlement negotiations on major comprehensive plans/amendments and DRI cases involving complex policy and technical issues throughout the region and on various specialized issues throughout the State. Directed Florida Keys Field Office in implementing all facets of ACSC program requirements, including compliance review of comprehensive plans/amendments, administrative rulemaking and drafting of extensive plan amendments for comprehensive plans and land development regulations. Served as primary expert witness for the Department on compliance cases, rulemaking and development order/permit appeals.

Concurrently served as Transportation Administrator for the Division and focused on developing smart growth, multi-modal land use and transportation strategies. Implemented the start up of the Efficient Transportation Decision Making program for the Department to coordinate agency review of transportation improvements. Extensively involved in corridor review including agency coordination, comprehensive plan consistency evaluation, permitting issues and ultimate determination of compliance with Chapters 380 and 163, Florida Statutes as related to the widening of U.S.-1 in the Florida Keys between Key Largo and Florida City and on Big Pine Key in regard to protection of the Key deer. Conducted Department compliance review and related negotiations regarding comprehensive plan amendments authorizing widening of Krome Avenue in Miami-Dade County, focusing on growth management, urban sprawl, land use and access issues.

Concurrently served as Marina Siting Administrator for the Division in coordinating with USFWS and FFWCC on comprehensive plans and permitting related to marina siting and manatee impacts. Served as Department lead on numerous interagency committees, such as various Everglades committees, Florida Keys National Marine Sanctuary, concurrency and multimodal working groups, and various other coastal/environmental working groups. Provided specialized policy and technical analysis to support program implementation, including development impact analysis, evacuation modeling, listed species conservation planning and marina siting analysis. Provided program and budget analysis to support Division. Regularly interacted and presented before elected officials, local government staff, agency staff, private developers and interest groups.

COMMUNITY PROGRAM ADMINISTRATOR

Department of Community Affairs - Florida Keys Field Office

May 1988 - December 1994

Florida Keys ACSC/Field Office Administrator. Directed all field office operations and supervised staff of planners and biologists in implementing and enforcing Chapter 380, F.S., Florida Keys Protection Act. Formulated program policies, growth management strategies, review methodologies and compliance/enforcement tactics. Served as lead expert on complex cases involving multi-party negotiations, dispute resolution and compliance hearings. Facilitated public hearings and workshops concerning major policy issues, rulemaking, compliance and enforcement and on technical issues, such as evacuation modeling and level of service analysis. Conducted extensive rulemaking and drafted substantial amendments to comprehensive plans and land development regulations. Directed staff in

reviewing comprehensive plans, land development regulations, and development orders for compliance with Chapters 163 and 380, F.S. Directed field work and monitoring for development order compliance cases and initiated Chapter 120, F.S., enforcement actions through Notices of Violation and development order appeals. Directed research activities involving evaluation of habitat conditions, listed species, and development-related impacts. Served as Department liaison in implementing interagency coordination activities and served as member on numerous local, state and federal committees, such as National Marine Sanctuary committees, various Everglades committees, KEYWEP (habitat) committee, Hurricane Evacuation Modeling Committee and U.S. 1 LOS Task Force. Provided extensive expert testimony in administrative and judicial proceedings involving comprehensive plan/land development regulation compliance, administrative rules, eminent domain/takings, vested rights, and development appeals. Routinely presented before governing bodies, commissions, local government staff and review committees on program requirements and related policy issues, procedural requirements and technical studies. Provided program and budget analysis to support field office operations.

SENIOR PLANNER/ MUNICIPAL PLANNER

Ocala MPO/Planning Department

July 1985 - April 1988

Served as MPO coordinator for all planning activities of the Ocala/Marion County Metropolitan Planning Organization (MPO), including preparation of the annual MPO budget, administration of grant-assisted programs, development of the Unified Planning Work Program and Transportation Improvement Program, preparation of meeting agendas and support documents for the MPO, Transportation Technical Committee and Citizen Advisory Committee. Coordinated transportation modeling efforts and provided support in developing z-data files for FSUTMS model and program. Reviewed traffic studies for site developments and prepared related technical reports. Conducted development review involving evaluation of comprehensive plan amendments, rezoning applications, site plans, variances, special exceptions and Development of Regional Impact applications. Drafted comprehensive plan amendments, land development regulations, and specialized planning reports. Served as staff to the Planning Commission, Board of Adjustment, and Historic Preservation Board. Conducted research and analysis required for Department projects. Trained entry level staff on MPO operations.

ADJUNCT INSTRUCTOR

Florida State University, Periodically (2007-Present)

Department of Urban and Regional Planning. Periodically teach graduate courses in growth management and infrastructure planning.

EDUCATION

Florida State University, Masters of Science in Urban and Regional Planning. Graduated May 2002 (*Summa Cum Laude*)

University of South Florida, B.A. (major in Geography). Curriculum included Urban Planning, Physical Geography, Hydrology, Cartography, Photogrammetry and Conservation Planning. Graduated May 1985.

CERTIFICATES/MEMBERSHIPS/AWARDS

American Institute of Certified Planners/American Planning Association
Urban Land Institute

Florida American Planning Association Award (Co-Author of Ocala Historic Preservation Element)
Phi Kappa Phi National Honor Society
McClure Award for Academic Excellence
Legal 500 US, 2008 edition

EXPERT WITNESS EXPERIENCE

Testified as expert in over 40 administrative and judicial proceedings. Qualified as expert in urban and regional planning, growth management, administration of Chapters 163 and 380, F.S., Florida Keys Area of Critical State Concern program, aerial photograph interpretation and assessment of development impacts.