



Karl, E. Holley, AICP,
Director of Community Development
City of St. Pete Beach
155 Corey Avenue
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Memorandum

To: Mike Bonfield, City Manager
From: Karl E. Holley, AICP
Re: DCA Courtesy Review of SOLV Proposed Plan Amendments
Date: May 12, 2008

Please find attached review comments provided by DCA at the City's request for the proposed Comprehensive Plan amendments presented in the SOLV petitions. The Community Development staff has reviewed the comments and provides the following observations:

- 1) The comments concerning maps appear to be a formatting issue. All the maps necessary to support the proposed establishment of Redevelopment and Character Districts were included in the submission. I believe DCA's comments imply that these maps must be reformatted and labeled in accordance with the current Plan content.
- 2) DCA appears to be indicating that the designation of "Quality Community Element" is not consistent with the approved naming convention and needs to be incorporated into the Future Land Use Element.
- 3) Observations concerning the necessity to delete certain infrastructure policies appear to be based upon the assumption that the proposed Plan amendment provides for increased development potential. The same appears to be true for the references to required infrastructure impact analysis. It should be noted that the SOLV proposal is very similar to the Plan adopted by the City in 2005 and which was subsequently rescinded by the voters in 2006. In fact, it appears the overall development density provided for in the SOLV plan is less than that provided by the 2005 amendment. There was substantial dialog in 2005 with the DCA concerning these issues, but the DCA ultimately concluded that if there was no increase in the allowable development density resulting from the proposed Plan amendment on a City-Wide basis, there was no requirement to re-assess the infrastructure analysis and policies contained in the Plan. It does not appear that the DCA undertook quantitative analysis of this proposal in the manner that was

done in 2005 and that their comments reflect an assumption which can be demonstrated to be mathematically inaccurate. So long as the DCA rules governing these issues has not changed, there would be no necessity to address these comments.

- 4) Comments related to level of service for storm evacuation conflict with agreed upon County-Wide standards. This is an issue which will need to be discussed with the DCA for resolution.
- 5) Issues raised about the Temporary Lodging density pool appear to also to be a problem of formatting since the information DCA wishes to clarify or expand upon is clearly included in the proposed amendment; it simply appears that DCA did not identify it as such since it was not in the anticipated format. It should be noted that the DCA approved identical provisions in the City's 2005 amendment.
- 6) DCA' comment that any on-site affordable housing density would have to count against the overall residential density limitation is consistent with their position in 2005. This policy may have to be revised.
- 7) We will need to further clarify the DCA comments on the Residential Unit Reserve program. There is no clear articulation of why such a policy would not be acceptable and the DCA comments appear to more of an inquiry than an observation.
- 8) It appears the DCA comments related to the Housing Element are intended to point out that we are proposing the adoption of policies which require action by other governmental jurisdictions which are not a party to this Plan. This is a "chicken/egg" problem we will have to discuss with the DCA.

In general, there do not appear to be any comments which would threaten the overall legitimacy of Plan and the provision of additional supporting data or the reformatting of the document will likely address most of the issues identified, but there are at least a few issues which may require modification of the policy content of the proposed Plan. It should also be noted that full formal review of the proposed Plan by DCA may identify additional issues.