



*Sugarloaf Shores Property Owners Association  
17045 Overseas Highway Box 9  
Sugarloaf Shores, Florida 33042-3681*

October 8, 2018

Dear Planning Commissioners:

The Sugarloaf Shores Property Owners Association, Inc. (SSPOA) is an organization whose members are the owners and renters of nearly 350 residences on Lower Sugarloaf Key. SSPOA has been monitoring the Goal 109 post-Irma workforce housing proposals since they were first introduced in November 2017. Attached is a letter dated March 13, 2018 from SSPOA to the BOCC which commented on County staff's January 2018 report on the Goal 109 proposals. The purpose of today's letter is to update our earlier letter in advance of the Planning Commission's consideration of Goal 109 at its October 24, 2018 meeting. We ask that both letters be added to the record.

SSPOA applauds the County's efforts to incentivize the development of workforce housing in the Keys. We support most of the Goal 109 proposals that would accelerate the approval process for new workforce housing projects. We believe increased density for workforce housing projects is appropriate, but only in the case of projects that are located in or in close proximity to the major employment centers of Key West, Stock Island, and Marathon. Our specific comments on the Goal 109 proposals are set forth below.

**Limit the Geographical Scope of the 50% Density Increase.** SSPOA believes that the existing maximum density for workforce housing projects is more than enough for the lower-density, residential areas of the unincorporated County. We oppose any effort to increase the maximum density for workforce housing projects that are located anywhere in the area covered by the Lower Keys Livable CommuniKeys Plan (LKLCP) – from the Torch Keys through the Saddle Bunch Keys, including our own Sugarloaf Key. The LKLCP, which has the force of law through its incorporation into the Comp Plan, contemplates only low-density development that is compatible with our existing low-density residential and rural communities. Increased density for workforce housing is only appropriate in or very close to the major employment centers of Key West, Stock Island, and Marathon, in order to minimize traffic along US 1 and to limit high-density housing projects to areas of existing higher density.

**No Density Increase for Sub Areas and Overlay Districts Unless Explicitly Authorized.** Several recently proposed affordable housing projects are seeking to be authorized through a Sub Area Policy under the Comp Plan or an Overlay District under the Land Development Code. SSPOA believes that the Sub Area Policy or Overlay District for a particular project should be a self-contained set of very clear rules and limitations applicable to the project. Accordingly, we request that any increased density provided under Goal 109 not be available for a project that is covered by an existing or future Sub Area Policy or Overlay District unless that Sub Area Policy or Overlay District explicitly provides for that higher level of density.

**Retain the Protest Procedure.** The Goal 109 proposals seek to eliminate the protest procedure for workforce housing projects. Under this longstanding procedure, a minimum of four commissioners must approve certain projects for which at least a specified percentage of nearby property owners have

formally protested the project. This proposal seems to have been included under the guise of accelerating the approval process for workforce housing. But the applicability of the protest procedure does not actually slow down the approval process for a project. Rather, the protest procedure appropriately raises the bar for approval of a project which has a sufficient level of opposition from the nearby property owners. The protest procedure is an important protection for a community and should be retained.

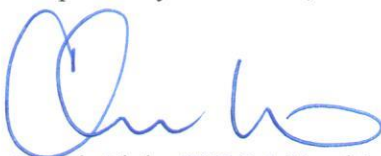
**Retain Commission Approval Requirement for Projects of More Than 20 Units.** The Goal 109 proposals seek to eliminate the need for Planning Commission (PC) approval and the right to appeal the PC's decision to the BOCC for every workforce housing project that contains more than 20 units. In the case of some workforce housing projects, such as projects in the Urban Residential zoning district, this more-than-20 process is the only way a project will be reviewed by the PC. For this reason, SSPOA opposes the elimination of the more-than-20 process.

**Retain Community Meetings for Text Changes.** The Goal 109 proposals seek to eliminate the requirement that a community meeting be held for a workforce housing project for which an amendment to the text of the Comp Plan or the Land Development Code is being sought. These can include text amendments that more generally apply to workforce housing projects in the County and to new Sub Area Policies and Overlay Districts for specific projects. SSPOA believes that such community meetings provide an opportunity for the public to make comments on a project or proposal at a time when helpful changes can most easily be implemented and thus they should not be eliminated. We support accelerating the timing of such community meetings along the lines that are being proposed in Goal 109 for map amendments and major conditional use permits.

**Less Open-Ended Effective Date of Goal 109.** The latest staff report on Goal 109 proposes that the incentives in Goal 109 apply to any workforce housing project for which an application is submitted to County planning staff and is determined to be complete within two years after the enactment of Goal 109. SSPOA believes that this effective date provision is too open-ended, as there is no requirement that the project actually be developed by a specified date. Because Goal 109 is meant to address a short-term housing crisis that was created by Hurricane Irma, we do not think a project should qualify for the Goal 109 incentives unless construction of the project commences by a specified date and is substantially completed by another specified date.

Thank you for your attention to our comments on the Goal 109 proposals. Please let us know if you would like to discuss any of the comments in greater depth.

Respectfully submitted,



Chuck Licis, SSPOA President

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