

Lower Keys Alliance, Inc.  
P.O. Box 996, Key West, FL 33041

June 19, 2018

Monroe County Mayor Rice,  
Monroe County Commissioners,  
Monroe County Planning Commissioners,

The members of the Lower Keys Alliance (the Alliance) consist of residents of the Lower Keys as defined in the Lower Keys Livable CommuniKeys Plan (LKLCP) – the Torch Keys, Ramrod, Summerland, Cudjoe, and Sugarloaf Keys, and the Saddle Bunch Keys. The Alliance supports the County’s efforts to encourage the development of workforce housing in the Keys. In this regard, the Alliance has supported a number of recently proposed workforce housing projects in the Keys, including low-density, smaller-scale projects in the LKLCP area.

Recently the Goal 109 proposals have been circulated by County staff. These proposals seek to increase the density limits for workforce housing projects in the Suburban Commercial (SC), Mixed Use (MU), and Urban Residential (UR) zoning districts and to streamline the approval process for workforce housing projects throughout the unincorporated County.

The Alliance opposes any increase in the maximum density of workforce housing projects in the LKLCP area because large-scale, high-density housing projects (1) would be incompatible with the character of our Lower Keys communities, (2) would be beyond what is necessary to serve the local needs of our Lower Keys communities, and (3) would significantly increase traffic on US 1 as most of the residents would be making long commutes to places of employment in or near Key West or Marathon.

According to the Vision Statement of the LKLCP, a document which was adopted by the BOCC and incorporated into the County’s 2030 Comprehensive Plan, the Lower Keys are to “remain a low-density, primarily residential community”. Goal 1 of the LKLCP states that “Monroe County shall manage future growth to preserve the rural or low density community character” of the Lower Keys. Numerous other

provisions of the LKLCP confirm the intention that development in the LKLCP area should focus on low-density, small-scale projects based on the desire that new development be compatible with existing development. Furthermore, Goal 4 of the LKLCP provides that the County should pursue the development of affordable housing in the LKLCP area, “while also ensuring compatibility between new and existing residential development”.

Consistency between the intensities of new and existing development is also an important stated goal of the Mixed Use-Commercial (MC) future land use category. See Comp Plan Policy 101.5.6. In this regard, virtually all of the properties in the LKLCP area on which workforce housing projects can be developed are part of the MC category (and the large majority of those are in the SC zoning district).

Another important principle of development and growth set forth in the LKLCP is that new commercial development should be of no greater density and scale than is necessary to serve the local needs of our communities. This principle appears in at least 7 places in the LKLCP, including Objectives 1.4 and 1.5. Similarly, the Land Development Code states that the purpose of the SC zoning district is to establish areas for commercial uses that are designed primarily to serve the needs of the immediate planning areas in which they are located. LDC Section 130-46.

Both state law and the County Comp Plan provide that affordable housing projects should be developed in or near the employment centers of the Keys. In designating the Keys as an area of critical state concern, the state legislature expressed its intent to provide affordable housing in close proximity to places of employment in the Keys. Fla. Stat. Section 380.0552(2). Moreover, the County Comp Plan states that one of the guidelines to be taken into account in assessing potential sites for affordable housing projects for which County funding is to be provided is the proximity of the project to employment and retail centers and sets forth a preference for sites that are within 5 miles of employment and retail centers. Comp Plan Policy 601.1.5(5).

The principal purpose of the Residential High (RH) future land use category is to provide for high-density single-family, multi-family, and institutional residential development, including mobile homes and manufactured housing, located near employment centers. Comp Plan Policy 101.5.4.

Limiting large-scale and high-density workforce housing projects to locations in or near employment centers would have the benefit of minimizing additional traffic on US 1. The LKLCP area is located approximately 11-26 miles from the entrance to Key West and approximately 19-34 miles from the entrance to Marathon. It is very likely that most of the units in a typical high-density workforce housing project in the LKLCP area would include employees of businesses or government entities who work in or near Key West or in Marathon. In this regard, increasing residential density for properties in the SC zoning district within the LKLCP area would be contrary to a stated goal of development in the SC district, which is to reduce traffic on US 1. See LDC Section 130-46.

For all of the reasons discussed above, the Alliance believes that additional density bonuses or increases for workforce housing projects as included in the Goal 109 proposals are inappropriate for the LKLCP area. The current allowable maximum density of 18 dwelling units per acre for the SC and MU zoning districts provides ample density for our rural and residential communities. Rather, large-scale and high-density housing projects should only be developed in or near the employment centers of Key West and Marathon.

While the Alliance generally supports the efforts made by the Goal 109 proposals to accelerate the timing of the approval process for proposed workforce housing projects, we believe that two of those provisions would inappropriately limit the ability of affected residents to comment on and object to such proposed projects. Specifically, the Alliance opposes the following proposals:

- (1) The proposed elimination of the requirement of a community meeting during the early approval stages of proposed text changes for workforce housing projects that currently require such a meeting. Community

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meetings are a great opportunity for the public to provide input at a time when changes to a proposal can most readily be made.

- (2) The proposed elimination of the protest procedure for any workforce housing projects for which the protest procedure is currently available. No such project should be developed without the support of a supermajority vote of the Planning Commission or the BOCC.

The Alliance will be happy to answer any questions that you may have regarding our comments above.

Respectfully submitted,

LOWER KEYS ALLIANCE, INC.

By: *Bill Hunter*

Bill Hunter, President

CC: Florida Representative Holly Raschein  
Florida Senator Anitere Flores  
Monroe County Administrator Roman Gastesi  
Monroe County Dir. - Planning & Environmental Resources Emily Schemper