



September 7, 2022

Submitted via email to ray.eubanks@deo.myflorida.com

Mr. Ray Eubanks, Plan Processing Administrator
Department of Economic Opportunity, Bureau of Comprehensive Planning
State Land Planning Agency
Caldwell Building
107 East Madison – MSC 160
Tallahassee, FL 32399-4120

Re: City of Gainesville Comprehensive Plan Amendment DEO Ref. No. Gainesville 22-3ESR

Dear Mr. Eubanks,

On behalf of 1000 Friends of Florida, our state's leading nonprofit smart-growth advocacy organization, we are writing to express concern over the Comprehensive Plan Amendment that the City of Gainesville recently transmitted. In an admirable effort to grapple with the City's equitable housing access and housing stock crisis, the commissioners voted 4-3 to transmit a Comprehensive Plan Amendment that eliminates single family zoning throughout the entire City and increases the maximum allowable density from 8 to 15 units per acre.

The affordable housing crisis in Florida is a complex problem plaguing growing cities nationwide, and a booming college town is no exception. However, this Plan Amendment contemplates a sweeping, simple solution to fix a complex problem. Normally, that would be fantastic progress, except there is a lack of data and analysis that actually demonstrates how the elimination of single-family zoning makes meaningful strides towards solving the City's affordable housing crisis.

Current city ordinances require a robust analysis for changes to land's future land use designation or zoning designation. For example, to change the future land use designation of land, the city must consider:

- “The need for additional land in the proposed land use category based on the projected population of the city and the relative availability of the current and proposed land use categories.” Gainesville Land Development Code § 30-3.13.B.
- “The proposed land use category of the property in relation to surrounding properties and other similar properties.” *Id.* at para. C.
- And “The potential impact of the land use change on adopted level of service standards.” *Id.* at para. D.

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Similarly, to change the zoning designation of land, the city must consider:

- “Compatibility of permitted uses and allowed intensity and density with surrounding existing development.” Gainesville Land Development Code § 30-3.14.A.
- “The character of the district and its suitability for particular uses.” *Id.* at para. B.
- “The proposed zoning district of the property in relation to surrounding properties and other similar properties.” *Id.* at para. C.
- “Conservation of the value of buildings and encouraging the most appropriate use of land throughout the city.” *Id.* at para. D.
- “The applicable portions of any current city plans and programs such as land use, traffic ways, recreation, schools, neighborhoods, stormwater management and housing.” *Id.* at para. E.
- “The needs of the city for land areas for specific purposes to serve population and economic activities.” *Id.* at para. F.
- And, “Whether there have been substantial changes in the character or development of areas in or near an area under consideration for rezoning.” *Id.* at para. G.

Sweeping changes in land use call for consideration of development’s public infrastructure needs, of the impacts to the environment, and of practices to ensure new development is compatible with existing development. Basing a change in density on estimated population increases is sound planning.

Prior to the transmittal hearing, we recommended to the City that it tailor the proposed inclusionary zoning provisions to different city neighborhoods based on their inherent character. Appropriate lot sizes, setbacks, shade tree standards, and densities will vary across neighborhoods based on existing neighborhood form and on water, sewer, stormwater, and transportation infrastructure. A one-size-fits-all zoning solution will not respond to this reality. This recommendation was not included in the transmitted plan amendment, but we continue to think this measured approach is warranted. We hope that DEO agrees and provides comments to the City reflecting that more nuanced approach to the problem, as well as the City’s obligation to comply with its ordinances.

1000 Friends strives to give citizens a meaningful role in shaping the futures of their communities and state. We believe a core function of planning is not just to build great cities, but to have a process that is fair and open to all. Based on these principles, we are concerned about the potential for the displacement of disadvantaged populations that may be vulnerable to selling their property because of current financial constraints. It is highly likely that the replacement units will not be attainable housing options for these displaced communities. This one-size-fits-all zoning has the strong potential to fast-track gentrification, which will further exacerbate existing equity issues.

We hope that your department will consider commenting on the Plan Amendment with requests for the City to include specific data and analysis to support the concept that elimination of single family zoning will achieve the desired outcome of creating affordable housing, as defined by statute. We anticipate that the DEO will review more of these types of amendments as other local governments try to creatively address the affordable housing crisis. Providing clear criteria in the form of data and analysis to support these endeavors will create much-needed guidance on this issue.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Jane West".

Jane West
Policy & Planning Director