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February 28, 2024

Andrew Persons, Chief Operating Officer
City of Gainesville
200 E University Ave
Gainesville, FL 32601

SUBJECT: City of Gainesville Comprehensive Plan Update

Dear Mr. Persons,

I have been retained by Gainesville Neighborhood Voices, Inc., to independently review the draft update to the Gainesville Comprehensive Plan identified as “Imagine GNV – The Comprehensive Plan 2030” posted on your website. My purpose is to help you fulfill the overarching themes while meeting the requirements of state law and utilizing sound planning principles.

I was retained due to my 46 years of land use expertise in Florida, I have worked with local governments throughout the state on growth and development issues. My vita is attached.

Planning Process

The Gainesville update process has been ongoing for several years. The City Commission passed a direction-setting Resolution on October 19, 2019, and on August 15, 2023, a Joint Workshop with the City Plan Board was held. Public outreach has reportedly occurred through “Conversations in a Box”, “Listening Sessions”, and through surveys although I have not seen a summary of that input.

Unfortunately, the process has become protracted. It would be very helpful if you could share the schedule of community meetings, public workshops and formal hearings you will hold as you move forward through completion of the comprehensive plan update. Based on my experience the city would greatly benefit by investing time in focused one-on-one meetings on key issues.

Overarching Themes of Imagine GNV

Imagine GNV identifies “...priorities and actions the city can take over the next decade to reinvest in marginalized communities, address the historic and current impacts of structural racism, and guide decisions affecting nearly every aspect of life in Gainesville...”

Having reviewed data from the US Census regarding demographics, housing and income and previous reports prepared for the City of Gainesville your direction toward addressing the identified issues is encouraging.

While the previous data and analysis is valuable, I trust the city is continuing to assemble and assess best available information regarding recent development trends, conditions and costs particularly in regard to affordable, workforce and student housing.

Existing Comprehensive Plan

There is no question that the existing Gainesville Comprehensive Plan is sorely out of date. The plan was last fully assessed through an Evaluation and Appraisal Report in 2010. Following this assessment, the plan was updated in 2013. Therefore, it has been 14 years since the last full assessment and 11 years since the last major update.

As one example, the Goals, Objectives and Policies of the Housing Element were last updated on October 12, 2013. The Housing Element Data and Analysis Report posted on the City's website is dated March 4, 2002. Implementation of commitments in the Future Land Use and Housing Elements have been left incomplete further indicating the imperative that issues are re-assessed in the context of best available data and analysis.

Comprehensive Plans in Florida

Florida Statutes requires that each local government in Florida adopt and implement a comprehensive plan which provides principles, guidelines, standards and strategies for the orderly and balanced future economic, social, physical, environmental, and fiscal development of the area. The required and optional elements of comprehensive plans are enumerated in Section 163.3177, Florida Statutes.

Of crucial importance are requirements that the plan establish meaningful and predictable standards for the use and development of land and provide meaningful guidelines for the content of more detailed land development and use regulations. Comprehensive plans are to be internally consistent and based on relevant and appropriate data and analysis.

Imagine GNV more a Strategic Plan than a Comprehensive Plan

Unfortunately, a complete balanced approach is not now present in Imagine GNV. What you have now is a partial draft which omits major components essential to the comprehensive plan. The informational foundation for the draft is incomplete. These deficiencies if left unaddressed will render the overarching themes of Imagine GMV unrealized and a plan which fails to meet state law.

Required Components of the Comprehensive Plan

The draft Imagine GNV document falls woefully short of meeting Florida's planning requirements. It consists of 89 pages the majority of which is background discussion and very little which addresses core planning requirements. The most glaring omission is the total absence of a Future Land Use Map, Future Land Use Categories and Future Land Use Criteria.

Statutory Planning Requirement	Imagine GNV
The comprehensive plan must contain a capital improvements element designed to consider the need for and the location of public facilities in order to encourage the efficient use of such facilities. (ss. 163.3177(3)(a), F.S.)	Absent
Each local government comprehensive plan must include at least two planning periods, one covering at least the first 10-year period occurring after the plan’s adoption and one covering at least a 20-year period. (ss. 163.3177(5)(a), F.S.)	Absent
A future land use plan element designating proposed future general distribution, location, and extent of the uses of land for residential uses, commercial uses, industry, agriculture, recreation, conservation, education, public facilities, and other categories of the public and private uses of land. (ss. 163.3177(6)(a), F.S.)	Absent
A transportation element addressing mobility issues in relationship to the size and character of the local government and providing for a safe, convenient multimodal transportation system coordinated with the Future Land Use Map. (ss. 163.3177(6)(b), F.S.)	Partially present
A general sanitary sewer, solid waste, drainage, potable water, and natural groundwater aquifer recharge element correlated to principles and guidelines for future land use, indicating ways to provide for future potable water, drainage, sanitary sewer, solid waste, and aquifer recharge protection requirements for the area. (ss. 163.3177(6)(c), F.S.)	Absent
A conservation element for the conservation, use, and protection of natural resources in the area, including air, water, water recharge areas, wetlands, waterwells, estuarine marshes, soils, beaches, shores, flood plains, rivers, bays, lakes, harbors, forests, fisheries and wildlife, marine habitat, minerals, and other natural and environmental resources, including factors that affect energy conservation. (ss. 163.3177(6)(d), F.S.)	Partially present
A housing element consisting of principles, guidelines, standards, and strategies. (ss. 163.3177(6)(f), F.S.)	Partially present
An intergovernmental coordination element showing relationships and stating principles and guidelines to be used in coordinating the adopted comprehensive plan with the plans of school boards, regional water supply authorities, and other units of local government providing services but not having regulatory authority over the use of land, with the comprehensive plans of adjacent municipalities, the county, adjacent counties, or the region, with the state comprehensive plan. (ss. 163.3177(6)(h), F.S.)	Absent
Data and analysis (ss. 163.3177(1), F.S.)	Partially present
Internal consistency (ss. 163.3177(2), F.S.)	Absent

Key Issue Area to be Addressed

From my perspective, future land use and housing issues warrant the highest level of attention during the comprehensive plan update process. In particular, the City of Gainesville should focus on balancing opportunities for job creation, affordable and workforce housing and protection of existing neighborhoods in a real estate setting of burgeoning student housing. These critical, foundational issues should not be put off to be addressed late in the planning process. I believe a balanced approach can be accomplished through collaboration and would like to assist.

Conclusion

I am pleased the City of Gainesville is working toward a comprehensive plan update. The issues the city finds itself grappling with are very much interdependent which makes the comprehensive plan a critical vehicle to promote a better future for your community. A hallmark of Florida planning law is that comprehensive plans are to be based on relevant and appropriate data and analysis, I look forward to your efforts in that regard.

Charles Gauthier, FAICP, LLC
February 28, 2024

I hope these comments will be helpful to you. I would appreciate the opportunity to meet with you and your staff in the near future and will be touch for that purpose.

Sincerely,



Charles Gauthier, FAICP

CC Honorable Mayor Harvey Ward
 Honorable Commissioner Cynthia Chestnut
 Honorable Commissioner Reina Saco
 Honorable Commissioner Desmon Duncan-Walker
 Honorable Commissioner Ed Book
 Honorable Commissioner Casey Willits
 Honorable Commissioner Bryan Eastman
 Cynthia W. Curry, City Manager
 Daniel M. Nee, City Attorney
 Casey Fitzgerald, President, Gainesville Neighborhood Voices, Inc.

Vita
Charles Gauthier, FAICP

I have worked in Florida for over 46-years as a professional planner in the areas of growth management, land use planning, environmental planning, land use regulation, zoning, and site planning. I have been a member of the American Institute of Certified Planners since 1988; in 2011, I was inducted as a Fellow for outstanding contributions to the public interest the highest achievement available at a national level.

At the local level of government, I served as Chief of Long-Range Planning for Collier County during preparation of the 1989 Growth Management Plan. As Lee County's Zoning Manager, I presented over 300 re-zoning requests to the Board of County Commissioners. For 17-years I served as a senior state official with the Florida Department of Community Affairs overseeing local government implementation of comprehensive planning, large-scale development, and land development regulation throughout Florida. During my career I have worked for major consulting firms representing both governmental and development interests.

In 2014, I started my own practice with the goal of using my knowledge, skills and experience to serve the public interest by providing expert planning services to public and private sector clients. My clients have included a diversity of interests including local governments, business, public interest groups and private individuals.

