

Aguila-Ilze

From: Stuart <sfschaffer@gmail.com>
Sent: Friday, October 14, 2022 8:26 AM
To: District1_planning; District2_planning; District3_planning; District4_planning; District5_planning
Cc: Aguila-Ilze; Katherine Winters
Subject: SSPOA Letter on Coco Palms Proposal

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Dear Planning Commissioners:

This letter relates to items 4, 5, and 6 on the agenda for the Planning Commission's meeting on Wednesday, October 26. This is a proposal by the owner of the Coco Palms trailer park and affordable housing project just west of Broil restaurant on Cudjoe Key for an increase in density on that property.

The members of the Sugarloaf Shores Property Owners Association (SSPOA) are the owners of more than 300 properties on Lower Sugarloaf Key. SSPOA supports the development of affordable workforce housing throughout the Keys, including in our area of the Lower Keys, provided that the project is of appropriate density and scale for its location.

Until not too long ago, Coco Palms was a 33-unit trailer park on a 2.2-acre lot. In 2019, the property owner sought text and map amendments, including a Sub Area Policy, to allow 16 of the trailer sites to be replaced with modular affordable workforce housing units. SSPOA supported that proposal because the number of dwelling units was not being increased, the new units would be much more resilient than trailers, and the Sub Area Policy stated that affordable workforce housing units were all that could be developed on the site. The 2019 proposal was approved by the Planning Commission and the Board of County Commissioners, and the 16 modular units have since been built.

Now the property owner is seeking a rezoning of the property from Suburban Commercial to Urban Residential, and related amendments, that would increase the density of the project from 33 to 46 affordable workforce housing units. SSPOA believes 46 units is too much density for this small lot on Cudjoe Key. Our position is that large, highly dense workforce housing projects should be located closer to the main employment centers of Key West, Stock Island, and Marathon. This would minimize traffic on US 1 and would concentrate affordable workforce housing projects in locations with traffic lights and adequate public transportation services (which is not Cudjoe Key). There is already plenty of affordable workforce housing on Cudjoe Key, with the 33 units at Coco Palms and the 16 new Habitat for Humanity units nearby, to service the needs of local businesses.

SSPOA believes there is another problem with the Coco Palms proposal that could have far-reaching implications for all of the Keys. For years, developers have sought to increase permitted affordable housing density throughout the County. That culminated in the Goal 109 proposal, which SSPOA opposed and which was ultimately rejected by the BOCC. We are concerned that if the new Coco Palms proposal is approved by the Planning Commission and the BOCC, owners of Suburban Commercial lots up and down the Keys will be encouraged to seek similar zoning changes for the sole purpose of increasing permitted affordable housing density from 18 units per buildable acre to 25 units per buildable acre — a nearly 40% increase in density.

We can't help but point out the irony if County planning staff recommends that the Planning Commission approve the Coco Palms proposal in light of the Planning Commission's previous approval of an 88-unit affordable workforce housing project at the entrance to South Point on Lower Sugarloaf Key. Staff recommended approval of the South Point project based on its determination that the project would not violate the Lower Keys Livable CommuniKeys Plan. The main reason staff reached that conclusion was that the property on South Point had been zoned Suburban Commercial prior to the enactment of the LKLCP and the density of that project was within maximum SC permitted density. Well, the Coco Palms proposal would vastly increase the density of that project by virtue of a rezoning for the sole purpose of increasing density. How could that not run afoul of the LKLCP? Where does the LKLCP condone any rezoning to Urban Residential in the low-density, less developed LKLCP area?

SSPOA asks that the Planning Commission reject the Coco Palms proposal on October 26.

Respectfully submitted:

Stuart Schaffer, on behalf of
Sugarloaf Shores Property Owners Association