

**Citizen Comments**  
**Public Hearing Agenda Item #13**  
**for the meeting of**  
**May 13, 2025**

**PUBLIC HEARING**

13. Transmittal Public Hearing on the Comprehensive Plan Update to the Future Land Use and Mobility Elements  
*(County Administration / Planning)*

This update provides citizen comments received after the agenda was published on May 6, 2025.

**From:** Steven E Pophal <[stevenpophal@comcast.net](mailto:stevenpophal@comcast.net)>  
**Sent:** Sunday, May 11, 2025 11:30 AM  
**To:** Ccattach <[Ccattach@leoncountyfl.gov](mailto:Ccattach@leoncountyfl.gov)>  
**Subject:** Proposed 2025 Comprehensive Plan effects on Woodland Drives

Subject: City of Tallahassee/Leon County Proposed 2025 Comprehensive Plan

Dear Commissioners,

I offer the following comments on the proposed Comprehensive Plan and especially its effects on the Woodland Drives neighborhood. Thank you for making a public response possible and your attention to this matter.

#### The Proposed changes

It is understood that the Comp Plan's stated goal for Woodland Drives is to preserve existing historic walkable neighborhood development patterns while allowing low to medium density residential with allowances for neighborhood scale accessories such as duplexes, triplexes, and quadraplexes and non-residential retail, offices, and community services and that the zoning district would be renamed Urban Residential Preservation allowing 12 units per acre with or even greater densities in certain circumstances.

#### Woodland Drives Neighborhood

The Woodland Drives neighborhood is residential in a park-like setting, made up of a mix of single and multifamily family homes linked with narrow two-lane streets and walkways. The current zoning ordinance designates it "Residential Preservation (RP-1) allowing 3.6 dwelling units per acre, preserving single-family residential character, protecting from incompatible land uses". Portions of the neighborhood fall within the Myers Park Historic District with other portions soon becoming eligible to join.

#### Impacts on our property

The proposals would allow significant changes, mostly nuisances, to occur near our properties. Neighboring property could be redeveloped with triple or greater residences on the same parcel. Traffic from each residence could add 5, 10 or more daily trips totaling 15 to 30 or more additional trips per day past your house, just from our neighbor's property. The additional rainwater runoff from the drives, parking spaces and rooftops would flow past our house. At some point, utility services would require additional capacity, with portions of the associated costs likely distributed to all of us. Our neighbors' office or retail use would have similar but much greater demands and impacts.

#### The comprehensive plan versus the zoning code

The comprehensive plan is intended to outline the long-term vision for land use and development within the jurisdiction, serving as a roadmap for local officials, developers, and residents alike, providing guidance and direction for growth and preservation. The City of Tallahassee states that the Comprehensive Plan is focused on planning for new population growth over the next 20 years considering greater densities via infill and growth at the City's edges on vacant land. Alternatively, the zoning code focuses on current needs, with standards for allowable uses, density, heights, setbacks, parking, landscaping and other issues. The zoning code is a legal ordinance of development requirements whereas the comprehensive plan is a long-range master plan. The development goals established in a comprehensive plan cannot be attained without a zoning ordinance. Approval of new development would require either ignoring the zoning ordinance criteria found in RP-1, granting a variance, or replacing the ordinance. The proposed changes are vague on how this would play out.

#### Development pressures applied to the Woodland Drives neighborhood

With no assurances that the protections granted by our RP-1 zoning ordinance will be adhered to, it appears that each development proposal that creates a conflict between the comp plan and the RP-1 ordinance would have to be defended by our neighborhood. There have been community discussions to prepare neighborhood plans but even so, they would not have the teeth that an ordinance provides and forever put the burden of protection on the neighborhood.

What did the proposed changes not get right

The vision that there is a need to plan for a future increased population is spot on, however, the comprehensive plan's broad-brush approach of allowing dramatic density increases and mixing incompatible uses throughout is harmful to the low-density residential neighborhoods' quality of life and should be restricted to the more urban portions of the city. The comprehensive plan should be refined to categorize the neighborhoods better with respect to the preservation of their attributes. Conflicts between the comprehensive plan and the zoning ordinance should be eliminated to preclude the need to ignore the law (ordinances) by granting variances.

I trust that your deliberations on the next steps will include consideration of these comments and urge you to send the proposed plan back to Staff for further refinement.

Sincerely,

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**From:** Randie Denker <[randiedenker@gmail.com](mailto:randiedenker@gmail.com)>

**Sent:** Saturday, May 10, 2025 9:42 PM

**To:** Dailey, John <[John.Dailey@talgov.com](mailto:John.Dailey@talgov.com)>; Matlow, Jeremy <[Jeremy.Matlow@talgov.com](mailto:Jeremy.Matlow@talgov.com)>; Williams-Cox, Dianne <[Dianne.Williams-Cox@talgov.com](mailto:Dianne.Williams-Cox@talgov.com)>; Porter, Jack <[Jacqueline.Porter@talgov.com](mailto:Jacqueline.Porter@talgov.com)>; Richardson, Curtis <[Curtis.Richardson@talgov.com](mailto:Curtis.Richardson@talgov.com)>; Nick Maddox <[MaddoxN@leoncountyfl.gov](mailto:MaddoxN@leoncountyfl.gov)>; [welchb@talgov.com](mailto:welchb@talgov.com); [cabanc@talgov.com](mailto:cabanc@talgov.com); David O'Keefe <[OKeefeD@leoncountyfl.gov](mailto:OKeefeD@leoncountyfl.gov)>; [cummingsc@talgov.com](mailto:cummingsc@talgov.com); Rick Minor <[MinorR@leoncountyfl.gov](mailto:MinorR@leoncountyfl.gov)>; [Matt.lutz@talagov.com](mailto:Matt.lutz@talagov.com)

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**Subject:** My thoughts on the final draft revisions of the Comp Plan

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Dear Commissioners and Mayor:

Unfortunately, I will not be able to attend the Comp Plan hearings this coming week because I am out of the country. However, I have been closely following the various revisions and updates of the proposed new Land Use and Mobility element of the Comp Plan. I would like you to consider my enclosed comments and urge you to send the proposed plan back to the Planning Staff for additional refinement.

1) The new land use category that is being called Urban Residential Preservation should be remanded back to the planning staff for the development of more nuanced land use categories that take into account 4 things: *a) The historic character of each affected neighborhood and how a change in land use densities and uses would impact it, b) The topography of each affected neighborhood and what it can physically bear in terms of stormwater, traffic, and other physical concerns c) Whether the neighborhood already has close-by access to commercial enterprises and therefore doesn't need commercial uses inside the neighborhood itself; and d) The consensus opinion of the majority of residents of the neighborhood.*

Neighborhood input has been sorely lacking in creating these new land use categories because of the compressed time frames and all the constant changes. These proposed revisions were not available online until very recently, and have been updated and changed right up until this week! Thus, many neighborhood residents still do not exactly know what is planned for their neighborhood.

I would also urge you to include a definition (either in the body of the policies or in the glossary) to define the term "units per acre." The new land use categories use the term "units per acre" in describing allowable new densities. However, there is no definition anywhere of the term "units per acre." I urge you to adopt the following definition for "units per acre:" *A 'unit per acre' shall be any structure intended for habitation or which is greater than 800 sq ft.* This language would include ADUs and things like an 8-car garage, but not a garden shed or a normal detached garage.

At the current time, ADUs are excluded from the density calculation even though many of them are more than 800 sq. ft, and have their own address, utilities, mailbox, and driveways. If this definition is not adopted, then the 12 units per acre being proposed for the new Urban Residential Preservation land use category is ACTUALLY 24 units per acre.

If the Commissions do decide to adopt the new Urban Residential Preservation category, then I would ask you adopt the Alliance of Tallahassee Neighborhoods (ATN) proposals to protect the neighborhoods from unwanted intrusions that will radically change the neighborhood character.

2) The second item that needs to be addressed is the future of Midtown and Northwood Mall. The proposed Comp Plan revisions contemplate the creation of "special districts" being carved out for individual planning. However, no such districts are specified in the new plan. Therefore, I would ask that the Northwood Mall and Midtown be included as special districts. This would allow for master-planning, as is already envisioned by the City Commission, which has already hired master planners to work on a holistic plan for the Northwood Mall and which has also appointed members of the business community

and the neighborhoods to a special board called the Midtown Stakeholders Committee to create parameters for a Midtown Master Plan. If master-planning is to be successful at these two sites, it is critical that the status quo be preserved until such time as the master plans can be completed. If the current land use designation is adopted, it will make the Midtown Stakeholders Committee obsolete because the proposed new category (Urban General) makes all the decisions about size, use, density, height, and design, which leaves nothing left for the Committee to do.

3) I strongly urge the Commissioners not to adopt the so-called “lake protection” land use category, which should be called a lake-destruction category. The allowable densities (1 dwelling unit per 2 acres) are fine. However, it is unlikely that these allowable densities will be adhered to because the new language creates so many exceptions for development when central sewer is available. Ecologically speaking, sewage is only one of MANY lake pollution concerns. This policy completely ignores the many other reasons why dense development on lakes eventually degrades water quality. A very partial list of the reasons why lakes become hyper-eutrophic (highly polluted with nitrogen) includes: cutting of trees, planting of lawns, fertilizer usage, erection of docks, boat maintenance, destruction of the littoral zone (natural vegetation surrounding the lake), increased impervious surface, oils and greases from motorized vehicles, and loss of natural areas to absorb polluted runoff before it can reach the lake. This proposed policy seems to imply that if central sewer is available, then density on a lake doesn’t matter. This is simply not good science. While septic tanks are harmful to lake quality, they are only part of the problem.

Therefore, I would urge you to remove these density bonuses and keep the lower densities. Also, if we are serious about protecting our lakes, please add additional requirements for development near lakes that require retention of at least a 100' littoral zone, except for one 15-foot cut to the lake for access. Also, please add these additional protections: No use of fertilizer on lakeside lots. No impervious surface within 100 feet of a lake. The number #1 reason why lakes quickly go hyper-eutrophic is soil erosion during construction. We need better barrier protections during construction. The hay bales and siltation curtains currently required are not protecting our lakes during heavy storm events. I would also add that the County and City should levy heavy fines for violations! This entire 1.8.7 (Lake Protection section) is a disaster and I think it needs to be rewritten. Commercial development does not belong in Lake Protection. Period. This section will spell the death knell for whatever healthy lakes remain in Leon County, which aren’t many. We need to be protecting the littoral zones of our lakes and replanting them where they have already been destroyed (which is most of them.) Any purported lake protection plan that does not have some kind of provision for littoral zone protection (and reestablishment), is doomed to failure in its mission.

4) Finally, I would urge you to change the wording of the Policy 2.2.1 which states that the Urban Service Area (USA) shall be 50% larger than needed for the “long-term planning horizon” but it does not state an actual number, such as 10, 20, or 25 years. The current language implies that the USA shall always be 50% larger than needed at any given time, as opposed to over-sizing it for a long-term period and then waiting until there is additional land needed. While I understand the need to plan for future development, the size of the USA should be pegged to annual anticipated growth, not to an arbitrary number, and it should include an actual time frame instead of vague language.

With the recent addition of Welaunee Plantation to the USA, it appears that the USA boundary is already much larger than 50%. This begs the legal question that if this policy is adopted in its present form, it might be possible for someone to sue the City to force it to retract the USA line in order to comply with the legal 50% requirement in 2.2.1.

At the current time, growth in Leon County is increasing slowly. The County's largest annual population increase since 2010 was 1.9% between 2011 and 2012, but population actually declined between 2012 and 2013 when it dropped .6%. Population also declined again in 2023. If you average out all growth since 2010, Leon County has only grown at a rate of 0.6% per year. (Numbers taken from federal government data)

If the Comp Plan intends to plan for needed urban expansion over the next 10, 20 or 25 years, then the size of the USA should not be 50% larger because this equation is much larger than actual growth. It also anticipates that ALL new growth will be outside the current USA boundary and it assumes that there will be zero urban infill. By over-sizing the USA boundary by 50%, this policy is encouraging urban sprawl instead of urban infill, which also works against the whole reason that is being given for changing the urban land use categories to encourage denser downtown infill. This creates dueling propositions: one policy encourages denser urban infill and the other encourages more sprawl and an ever-expanding USA boundary. It's like putting a humidifier and a de-humidifier in the same room and letting them duke it out.

If the population growth projections include students, then the USA does not need to be 50% bigger because university housing is only happening in and around FSU and FAMU, not outside the USA boundary. A smaller USA boundary would ensure more compact urban growth and harmonize with the rationale for creating denser urban land use categories.

Therefore, I would recommend changing this policy to peg the USA boundary expansion to actual anticipated growth needs for 10, 20 or 25-year periods, and not allowing further USA expansions until such time as there is a demonstrable need for more land conversion. I would also recommend a ban on new City and USA annexations **unless and until** it can be shown that there is not enough developable land within the current USA boundary. The proposed formula needs to be pegged to actual growth rates and the actual need for developable land. Otherwise, we will continue to see more expensive urban sprawl and less efficient urban infill.

Thank you for considering my comments, and I remain available to discuss them with you at any time, by phone or by email.

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**From:** David July <[leoncountyfl.gov@mountsutro.org](mailto:leoncountyfl.gov@mountsutro.org)>  
**Sent:** Saturday, May 10, 2025 12:04 PM  
**To:** Ccattach <[Ccattach@leoncountyfl.gov](mailto:Ccattach@leoncountyfl.gov)>  
**Subject:** Please Support ATN's Comprehensive Plan Updates

Good afternoon. I am writing today from Indian Head Acres, on the one year anniversary of the devastating tornadoes, and as a twenty-year city resident to express my support for the Alliance of Tallahassee Neighborhoods' proposed updates to the Comprehensive Plan, which is to be discussed on 14 May 2025 (agenda item 16.01). Thank you.

**From:** John Outland <[outlandjb@hotmail.com](mailto:outlandjb@hotmail.com)>  
**Sent:** Friday, May 9, 2025 12:34 PM  
**To:** Ccattach <[Ccattach@leoncountyfl.gov](mailto:Ccattach@leoncountyfl.gov)>  
**Subject:** Comprehensive Plan

I urge the Commissioners to recognize the presence and extent of our natural features and direct development away from these areas and to areas with supporting infrastructure. This policy should not be deferred to or implemented by the planning and/or permitting process that defers to mitigation rather than avoidance of effects. Instead the Plan should clearly state that impacts to natural areas will be avoided by setbacks and protected by perpetual conservation easements with no exceptions.

Kind regards,

John Outland



**From:** Christine Franzetti <[chrisfranzetti@aol.com](mailto:chrisfranzetti@aol.com)>  
**Sent:** Friday, May 9, 2025 12:27 PM  
**To:** Nick Maddox <[MaddoxN@leoncountyfl.gov](mailto:MaddoxN@leoncountyfl.gov)>  
**Subject:** PLEASE PROTECT LOS ROBLES —OPPOSE URBAN RESIDENTIAL LAND USE REDESIGNATION.

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May 9, 2025

Dear Commissioner Maddox,

I am a resident of the Los Robles neighborhood, a unique 37-acre historic neighborhood that has been listed on the National Register for Historic Places since 2014. I am writing to you to register my opposition to a proposed amendment to the Comprehensive Plan, specifically the proposed change in Land Use designating Los Robles to be included in Urban Residential Preservation.

If approved in the amended Comprehensive Plan, the Urban Residential Preservation category would increase density from 6 to 12 units per acre and allow offices and commercial uses in our neighborhood's residential streets. Commercial intrusion threatens not only our architectural character but also our residential way of life, walkable streets, limited parking and pedestrian safety. Commercial businesses are prohibited in Los Robles under its current Residential Preservation land use designation.

A better fit for our neighborhood would be Suburban Residential Preservation. This category allows up to 8 units per acre and safeguards civic spaces, like the existing Woman's Club and Los Robles Park, from incompatible commercial uses.

I respectfully urge you to reject the Urban Residential Preservation designation for Los Robles and support applying the more appropriate Suburban Residential Preservation category. This designation more accurately reflects our neighborhood scale, historic character and longstanding residential use.

Thank you for your time, your service and your consideration of this request.

Sincerely,  
Christine Franzetti  
1635 Fernando Drive, Tallahassee

**From:** ThisBib <[thisbib@comcast.net](mailto:thisbib@comcast.net)>

**Sent:** Friday, May 9, 2025 11:01 AM

**To:** Brian Welch <[WelchB@leoncountyfl.gov](mailto:WelchB@leoncountyfl.gov)>; Bill Proctor <[PROCTORB@leoncountyfl.gov](mailto:PROCTORB@leoncountyfl.gov)>; Rick Minor <[MinorR@leoncountyfl.gov](mailto:MinorR@leoncountyfl.gov)>; Christian Caban <[CabanC@leoncountyfl.gov](mailto:CabanC@leoncountyfl.gov)>; David O'Keefe <[OKeefeD@leoncountyfl.gov](mailto:OKeefeD@leoncountyfl.gov)>; Carolyn Cummings <[CummingsC@leoncountyfl.gov](mailto:CummingsC@leoncountyfl.gov)>; Nick Maddox <[MaddoxN@leoncountyfl.gov](mailto:MaddoxN@leoncountyfl.gov)>; Porter, Jack <[Jacqueline.Porter@talgov.com](mailto:Jacqueline.Porter@talgov.com)>; Dailey, John <[John.Dailey@talgov.com](mailto:John.Dailey@talgov.com)>; Richardson, Curtis <[Curtis.Richardson@talgov.com](mailto:Curtis.Richardson@talgov.com)>; Matlow, Jeremy <[Jeremy.Matlow@talgov.com](mailto:Jeremy.Matlow@talgov.com)>; Dianne Williams-Cox <[dwmscox@gmail.com](mailto:dwmscox@gmail.com)>

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**Subject:** Comments on Proposed Comprehensive Plan Amendment Scheduled for Public Hearing in May, 2025

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Greetings Chair Welch, Mayor Dailey, City of Tallahassee City Commissioners, Leon County Board of County Commissioners, and staff:

On April 24th I sent you an e-mail including my attached comments on the proposed comprehensive plan amendment, proposing a new Land Use & Mobility Element and revised Future Land Use Map, to be considered at public hearing by the Board of County Commissioners on May 13, and at public hearing by the City Commission on May 14, for transmittal to the State of Florida.

Subsequent to me providing those comments, the Planning Department revised the amendment that you will be considering at public hearing. So I have revised my comments accordingly. I note that your staff addressed many of the issues I noted in my initial comments, but there remain some significant issues. I do not believe that the amendment, as drafted, is ready for transmittal. So I am recommending that additional changes be made to revise the amendment before its potential transmittal.

I am attaching a cover letter explaining my review and comments as well as a separate attachment including detailed comments.

Please feel free to contact me if you require any additional information or want to discuss this matter further.

**Thank you so much for your time and dedication to our community!**

Adam Antony Biblo

Tallahassee, FL

Friday, May 9, 2025

Members of the Leon County Board of County Commissioners  
Members of the City of Tallahassee City Commission

Dear Elected Officials,

I have read the proposed amendment to the Tallahassee-Leon County Comprehensive Plan scheduled to be considered at public hearing for transmittal to the State of Florida. The hearings are scheduled on May 13, for Leon County, and May 14, for the City of Tallahassee. The amendment proposes to revise the Comprehensive Plan to delete the Future Land Use Element and Transportation Element and replace them with a new Land Use and Mobility Element, and to revise the associated Future Land Use Map. I am enclosing my comments in response to this amendment for you and your staff's considerations.

Previously, in a letter to you dated April 24, 2025, I provided my comments in response to the text and maps of the proposed Land Use and Mobility Element, dated March 24, 2025, provided on the Tallahassee-Leon County website. Thereafter, I was surprised to find out that the amendment was being further revised. So I have re-reviewed the proposed revised amendment, dated April 21, 2025, and offer my comments in response to the updated version.

The proposed amendment makes several significant changes to comprehensive plan, including incorporating new strategies, such as, the use of *context-sensitive design* based on a land use density and intensity gradient, where lower intensity is intended for outlying rural areas and urban-type development is sought for the City center, and, promotion of community design that facilitates pedestrian and bicycle mobility, with less emphasis on travel by car than the present comprehensive plan does.

At the same time, the proposed land use and mobility element retains several significant strategies, policy directions and, implementation tools found in the present version of the comprehensive plan, including: the use of the urban services area; strategies to minimize sprawl; and, recognizing the importance of protecting residential land use from adverse impacts.

**I largely agree with the direction taken by the proposed land use and mobility element, but I do not believe that the amendment is ready to be transmitted to the State of Florida for their review. I say this based upon some of the significant issues I have raised in my comments. I would recommend instead that you direct your staff to make further changes to the amendment, based on the input you are receiving for these transmittal public hearings.**

I have offered many comments in response to my review, and while the litany of comments I have provided is lengthy, the vast majority of these comments are what might be referred to as "housekeeping" and "clean-up" and are not especially related to substantive direction. There are, however, in my opinion, some more significant substantive issues with the proposed amendment.

My comments are organized in three sections: Section 1) Significant Substantive Issues; Section 2) General or Over-Arching Comments; Section 3) The Proposed Future Land Use Map; and, Section 4) Sequential Comments.

Typically, like most reviewers, I conducted my review based upon what was proposed, and not as much what wasn't included. But through the effort of spending significant time on this review, I was able to also think of some, but likely not all, issues of significant substantive strategies that were not included in the proposed amendment (and in my opinion should be). These comments are included in Section 1).

Section 2) focuses on the formatting of the amendment as well as what I would deem *recurring issues* — issues found consistently throughout the amendment. Although many of the issues listed in this section are not significantly substantive, some are — in some instances, the choice to include a comment in Section 1) or 2) was subjective. Section 3) provides two comments on the proposed Future Land Use Map included in the proposed amendment.

Like most reviewers, I conducted my review by reading the amendment from the beginning to the end, and thus Section 4) provides comments based upon what I was reading in sequence, from Goal 1 to the last proposed policy. Not all users of the comprehensive plan will be reading it in sequence, so please consider that when you review my comments — issues that I point out with the beginning portions of the draft amendment may be resolved later in the document.

Section 4) generally contains the comments that are more “clean-up” than “substantive.” But the section does also include some important substantive comments; these are marked with a ○ bullet in the left margin. For many of the comments, I also offer a suggestion or recommendation for resolving the issue I have identified; a recommendation reflects a more significant issue or response than a suggestion.

I am offering these comments because I believe I very much owe it to our community to provide my insights. My background in this subject area is extensive; my familiarity with our community is extensive; and, most importantly, I want to see our community continue to thrive and grow responsibly. As to my background, I was one of the original drafters of the State of Florida’s 9J-5 Rule, its former rule specifying the content of comprehensive plans. I was responsible for much of the content required in local government comprehensive plan conservation and future land use elements and drafted the state’s model future land use element. I subsequently served our community in the Tallahassee-Leon County Planning Department for 17½ years, in which time I was responsible for, among other things, introducing the concepts of the urban services area and preservation and conservation features; developing the first land development regulations for public facilities and infrastructure; and, developing the City’s inclusionary housing strategy and ordinance. During my tenure with the Planning Department, I served in numerous capacities, including as the long-range infrastructure planner, special projects planner, housing planner, and also as the Land Use Administrator. I continued to serve our community as the Development Service Director at the Leon County Department of Growth and Environmental Management, where I was responsible for the major revision of the Land Development Code and oversaw the division responsible for all site planning and development review. After leaving Leon County, I returned to the State of Florida, serving in the Department of Community Affairs, which later became the Department of Economic Opportunity. In that department, I was the Regional Planning Administrator responsible for the team that reviewed all local government comprehensive plan amendments submitted to the state from the area extending from Brevard County to Orange County to Miami-Dade County. While at DEO, I managed the state’s local manufacturing development approval program and wrote the guidebook Designing Communities For Pedestrian Mobility. I currently practice urban planning and urban design with a focus on creating more walkable communities. I am a consultant for the Southwest Georgia Regional Commission and also assist neighborhoods with street design and traffic calming issues.

I hope my comments are helpful. If I can shed further light on any aspect of my comments or if you have any questions, please feel free to contact me via e-mail @ [thisbib@comcast.net](mailto:thisbib@comcast.net). Additionally, I may be available for phone call or in-person meeting, depending on scheduling. Thank you for taking the time to look at this response.

Adam Antony Biblo  
Tallahassee, FL

Enclosure: Comments on Proposed Land Use and Mobility Element Amendment

**Section 1) Significant Substantive Issues:**

The Omission of an Overarching Strategy Narrative: The element does not provide an overarching strategy(-ies) of how the community should grow. This kind of narrative does not need to be an adopted goal, objective, policy, or strategy. Providing this kind of narrative at the beginning of the element can be very helpful to the articulate to the reader, in general terms, the community's strategy as to how it should grow and help explain and tie together the various goals, objectives and policies that follow. Such narrative could include: how sparse and rural the outlying areas should be; how dense and urban the inner portions of the City should be; whether the community will develop dense urban nodes (*walk-ups* and *Transit Oriented Development*); whether and where growth should occur, and how rapidly it should occur; the degree to which the plan's provisions will facilitate neighborhood change and whether they will provide for greater density and the inclusion of compatible non-residential uses.

The narrative could also establish additional concepts that are reflected throughout the proposed element, such as: to what extent the density transition from rural to most urban will be based on the urban planning/urban design *Transect* concept and companion implementing context zones (and of course, to describe what this means); the extent that policy direction related to development design attributes and infrastructure design may used, in addition to limitations on density and intensity, and use type, to influence the location and character of future land use and development; whether regulation of design attributes and other approaches, such as mitigation of potential adverse impacts (nuisances) such as sound, lighting, hazardous vehicular traffic flow, will be used to promote land use compatibility, particularly where policy direction intends different types of land uses to mix or colocate; and, how fine a grain of mixture of uses is intended in those future land use categories that will provide for mixed use.

The Binding Long-Term Commitment to Include Excessive Land Within the Urban Services Area. Proposed Policy 2.2.1. provides that the Urban Services Area (USA) will be large enough to include 50% more vacant and developable land than necessary to accommodate projected population growth during the planning timeframe. This surplus of excess capacity is unnecessary, especially the commitment to maintain this surplus into the future.

While, this excessive capacity may be supported according to some land use demand projection methodologies, it promotes low and very low density development patterns, i.e., providing for the continued inefficient low density sprawling of our community at the expense of urban infill. It is recognized that the present size of the USA may be, in part, reflective of such methodologies, but the community has a choice to grow differently going forward — the continuing expansion of USA, over time, a product of keeping this 50% standard as a *constant*, will result in the vast majority of the community's growth taking the form of large-lot, low density residential subdivisions on the fringes of the USA.

Alternative approaches could include simply recognizing that the present size of the USA is reflective of providing 50% more vacant and developable land than necessary to accommodate the current population without committing to maintaining this standard over the planning timeframe, or by explicitly decreasing this standard over time. Additional discussion is provided in Section 4) under Policy 2.2.1.

The Omission of a Street/Roadway Functional Classification Map. The proposed element includes several references to streets and roadways referred to by “functional classification,” such as an *arterial*, *collector*, or *local* street. The proposed text includes at least 11 policies referring to arterial streets, for example. The text includes a proposed policy establishing adopted levels of service for the various streets and roadways within Tallahassee and Leon County and another policy specifying right-of-way widths for various streets and roadways, based upon their functional classification. Yet the proposed element and map series do not include a functional classification map, whereupon the functional classification of all of the City’s and County’s roads are designated. Proposed Policy 2.2.10. refers to the *Corridor Preservation Map* and the *Long-Range Transportation Plan*, inferring that these documents provide information on the designation of roads and streets by functional classification. The policy does not specify the location of the Corridor Preservation Map; it is not included within the map series included with this amendment.

The Omission of a Context Classification Map. The proposed element includes at least 46 references to *context*, often with *context* being the independent variable upon which some other design characteristic or land use variable is based. So inclusion of such a map underpins much of the strategy proposed in this draft element. One policy specifically addresses the provision of a map that provides context classification information: Policy 6.3.3 – Context Classification Map: A Context Classification map shall be maintained through the planning timeframe that recognizes roadway functional classification in addition to land use context. The Context Classification map shall be updated concurrently with amendments to the Functional Classification map and the Future Land Use map. Yet the proposed element and map series do not include a context classification map.

The Omission of Recognizing Potential Future Demand for Very Large Structures and Land Uses With Significant Energy Demand: The element does not provide guidance relating to large facilities that support AI (Artificial Intelligence) and other intensive electrical energy uses and large, multi-acre warehousing buildings. The element should recognize potential demand for these types of uses to be located within the community in the future and establish appropriate strategies.

The Coordination of Commuter Transit Service with Neighboring Jurisdictions. The strategy relating to transit service in the community, set out in Objective 6.10., and subsequent implementing policies, does not include any reference to coordination with neighboring jurisdictions (e.g., Wakulla County, City of Thomasville, etc.) for long-distance commuter transit opportunities now or in the future. It may be appropriate to recognize the potential for such services and coordinate with the applicable local governments.

The Limitation of Development Impacts to Natural Areas. Objective 1.2. and Subsequent implementing policies - *Preservation of Natural Areas* direct the identification and acquisition of important natural resource areas, but do not explicitly provide direction to protect these resources through limiting land development impacts, including limiting the density and intensity of development, within and adjacent to resource areas identified on development sites.

The Protection of Significant Cultural Resources: The draft Land Use and Mobility Element acknowledges the need to identify cultural resources, but only directs the *protection* of these resources with regard to new or existing transportation facility improvements (which it does in policy 1.2.3.).

**Section 2) General or Over-Arching Comments:**

References to Explicit Departments. Where the *Planning Department* (or other department) is explicitly referenced in policies, as in being tasked to do something, it may be more appropriate to simply refer to the applicable local government (or both local governments), given the potential for staffing resources and department responsibilities change over the timeframe of the plan.

Content and Terminology More Appropriate for Land Development Regulations. Several of the policies relating to the particular future land use categories specify the detailed types of building types allowable, such as, *duplexes*, *triplexes*, *quadruplexes*, *live-work units*. This is detailed implementation content typically relegated to land development regulations and (including, zoning regulations).

The listing of specific building types in the policies describing a future land use category could be construed to preclude those building types not listed, from the zoning district(s) that ultimately implement the future land use category. Likewise, the listing of specific building types in the policy describing the category could be construed to require *all of the zoning districts* that implement a particular category to allow *all* of the building types listed. This may or may not be problematic. But if it is problematic, it will also require a comprehensive plan amendment as a precursor to any land development regulation (e.g., zoning) amendment that would change what building types are allowed in a particular zoning district.

Scope and Applicability of Density Bonus Incentives. As drafted, some of the various density bonus incentives provided are drafted to enable density/intensity to be increased to levels greater than the otherwise applicable *future land use category* maximum limits. In other instances, the policies do not state whether the bonus would allow an increase in excess of what otherwise would be the *future land use category* limit or *zoning district* limit. In some instances, implementing zoning districts set out maximum density limits less than the future land use category they implement. Should the incentives instead allow for increases above otherwise applicable *zoning district* limits?

**Section 3) The Proposed Future Land Use Map:**

Boundaries Between Future Land Use Categories. The proposed Future Land Use Map depicts areas within the City and County where future land use categories intended to allow significantly different intensities of use or character of development are located across a street or road from one another. This is a classic error in urban design and land use compatibility: in good urban design, principal uses face one another — *look out* at one another — across streets...and this visual perception is one of the most important ways people gauge and experience compatibility.

Ideally, interfaces or boundaries between categories and districts of significantly different character and/or intensity should be located along shared rear lot lines or separated by categories or districts of transitional intensity or large areas of open space. Boundaries along rear property lines offer the additional benefit of enabling the provision of buffering to mitigate visual perception of differing land use and intensity.

It is recognized that there may be limited potential to address this issues, as most of the newly proposed future land use category boundaries are in the same location as the boundaries between categories on the Future Land Use Map presently in effect.

**4) Sequential Comments:**

**Policy 1.2.1.** This policy guides the City and County to acquire sensitive areas. Does this include for less-than fee simple acquisition (e.g., acquisition of easements) as well as fee simple acquisition? If so, good. If not, revise the policy as appropriate.

**Policy 1.2.2.** This policy specifies that Planning Department staff shall conduct an environmental analysis of proposed comprehensive plan amendments. The concept is good, but should the policy be revised to enable other City and County staff to be utilized in such analysis? Potentially the Planning Department may not have sufficient or appropriate resources to accomplish this requirement.

**Policy 1.3.2.** The policy does not provide guidance on who is intended to develop and maintain urban recreation spaces.

**Policy 1.6.2.** This policy requires zoning and development standards, within the Urban Services Area, to promote the location of homes, jobs [and other destinations] within 20 minutes walking distance of each other. 1) Why not consider, instead, a 15-minute standard? Within urban design and pedestrian mobility practice, this timeframe has gained more acceptance as a design standard. 2) Maybe the standard (20 minutes, 15 minutes, whatever) should be referenced as a *maximum* timeframe.

**Policy 1.7.1.** This policy specifies coordination with key regional partners on the protection of natural resources that extend beyond jurisdictional boundaries. The policy specifically mentions some agencies but does not mention any of the adjacent local governments (both within the State of Florida and the State of Georgia) nor does it mention the Apalachee Regional Planning Council or the Southwest Georgia Regional Commission. Recommendation: These are significant omissions; revise the policy to include these governments/agencies.

**Policy 2.2.1.** This policy provides that the Urban Services Area (USA) will be large enough to include 50% more vacant and developable land than necessary to accommodate projected population growth during the planning timeframe.

This standard appears to be significantly greater than needed to promote an efficient development pattern, particularly an *urban* development pattern. It would consume more forested land and agricultural land and require longer and require more costly infrastructure extensions than would be required by the respective population with even a modest urban development pattern (i.e., at a moderate development density/intensity). It is recognized that the location of the USA boundary on the map included in the draft amendment is approximately the same location as the USA boundary that has been in effect for several years. Recommendation: Revise this policy to reduce the percentage of surplus vacant and developable land necessary to accommodate population over time, so that a 50% surplus is not continually provided for over time, but reduced, to reflect urban intensities and densities with this portion of the USA; failure to do so could result in less-than urban development patterns sprawling within the USA.

**Policy 2.2.6.** This policy provides for exceptions to the Urban Services Area concept to provide for higher density within areas near the Woodville Rural Community [future land use map category] when central sewer service is available and development connects to sewer. 1) Is it necessary to also set a maximum development density/intensity limit for this development within this policy? Or is this policy the basis for another policy that provides such limit? 2) This policy is imprecise with regard to location of its application. As written, it would allow the extension of higher density development in any area designated Rural or Rural Residential on the future land use map, so long as it is connected to sewer and subjectively



located within the area described in the policy. Recommendation: review this policy and if appropriate, specify geographic limits where this exception is intended to apply; or, provide a map designating the applicable location.

**Policy 2.2.7.** This policy requires consistency with the priority of urban services, the Future Land Use Map, and the Urban Services Area in conjunction with “the *widening* of existing streets and roads.” Widening streets and roadways is not necessarily the same as adding additional lanes; and either approach, while traditionally responses to increased growth and travel demand, are not always consistent with other community objectives, such as protecting natural resources, protecting residential use from adverse impacts, and creating human-scale environments that facilitate pedestrian activity. Suggestion: Instead of implying that streets and roads must always be widened to accommodate projected growth and demand, use alternative terminology such as *modifying*, *improving*, or *reconstructing*, which encompasses *widening* but is not limited to *widening*.

**Policy 2.2.8.** This policy promotes brownfield reclamation, building reuse, and adaptive reuse of structures, enabling these activities through provision of incentives in the land development regulations. The policy outlines the content of the land development regulations incentives; it does not include any provisions for mitigation of environmental or environmental health issues associated with the applicable brownfield sites. The policy also provides for “density and intensity bonuses of up to 25% modified development review thresholds.” It is not clear if this intended to refer to maximum limits otherwise set out for the applicable future land use category in the comprehensive plan or zoning district (land development regulation) limitations, or other. Suggestions: 1) Revise the policy to provide for or recognize that mitigation of adverse environmental conditions are prerequisite to any redevelopment of brownfield sites; 2) clarify the reference basis for density/intensity bonuses.

**Policy 2.2.9.** It is not clear how this policy does anything other than what is provided for in Policy 2.2.8., except to add the term “Greyfield.” Suggestion: If appropriate, merge these policies together.

○ **Policy 2.2.10.** This policy specifies the protection of identified future rights-of-way from building encroachment; it does not specify what the appropriate setbacks would be, but includes a table specifying significant rights-of-way widths for the types of transportation facilities listed.

A word of caution: The City of Tallahassee had, at one point, a similar approach wherein the implementing land development regulations (with their basis also established in the comprehensive plan) required a “special roadway setback,” to protect identified corridors from development encroachment, and thus to make it easier and less expensive for the City acquire needed right-of-way for roadway construction. This regulation was challenged, as applied, as a taking, with no legitimate public health, safety, or welfare basis. [The City was able to prevail as its implementing regulations provided affected property owners with alternative design “exceptions” that made it possible, in the plaintiff’s instance, to realize their development interests within the remaining, reduced, buildable area resulting from the implementation of the setback]. The City thereafter also amended their regulations to minimize potential that they be used as a workaround to acquire right-of-way without appropriate compensation.

○ **Policy 2.4.1.** This policy establishes the basis for a Transfer of Development Rights (TDR) program. It limits the locations of where development rights may be transferred to areas designated Rural Residential or Rural Community on the Future Land Use Map. A TDR program can be a very helpful tool to help minimize sprawl and direct growth to the most appropriate areas of the community, areas where supporting infrastructure and facilities are

already present or planned to be available soon, and areas targeted for redevelopment, and further economic development. By precluding areas within the USA from receiving transferred development rights, this policy becomes, at best, a marginally useful tool.

Recommendation: 1) Revise the policy to provide for transfer of rights to within the USA, and in particular, areas targeted for greater densities and intensities. 2) Revise the policy to allow transfers of density out of the Lake Protection future land use category, as a tool to facilitate environmental protection of resources within the category.

**Policy 2.4.2.** This policy would require expansions of the USA to be based on an analysis of population projections and growth trends and an analysis of developable vacant land currently within the Urban Services Area. This is appropriate. But the policy fails to provide any criteria or guidance for decision-makers to use to determine whether, and to what extent, an expansion of the USA is warranted. While the intentions of the policy are good, as drafted, it is insufficient, simply requiring analyses but placing no particular regard as to their findings.

**Policy 2.5.1.** This policy sets out some strategies for retrofitting/reconstructing suburban areas. The proposed strategies are consistent with current best practices in urban design. Some of the terminology used in the policy might, however, be improved. Some of the terminology would be well understood by urban designers and most planners but may be less well understood by the general public and policy-makers. Examples of terminology that might benefit from revision include:

- *Complete streets* (this term has not yet be explained at this point in the proposed comprehensive plan)
- *Continuous streetscapes with liner buildings close to the street*
- *Appropriate design elements*
- *Residential building types*

In regard to the strategy of *block size reductions* — small blocks are an integral attribute of walkable and human-scale development, but while many (most?) of the blocks in the community are currently larger or significantly larger than ideal in these regards, not all are, and at some point, if block size reduction does occur, it will no longer need to *continue* over time. Suggestion: Consider some other wording, perhaps providing guidance as to what appropriate block size should be, instead of compelling the action to continually reduce the size of blocks.

Also, in the first sentence, consider using “adopt” or “enact” as opposed to “develop...land development regulations.”

**Policy 2.6.1.** This policy sets out street beautification strategies. Suggestions: Revise the policy: 1) “The local governments shall provide for land use regulations...” should be replaced by terminology like “The City and County shall adopt land development regulations...” 2) The policy refers to “...a given context.” The significance of this wording might be missed as the concept of context-based land usage/development concept, such as utilized by the Congress for New Urbanism, or the Florida D.O.T., based upon the new urbanists’ *Transect*, has not been explained yet at this point in the proposed comprehensive plan.

**Policy 2.6.2. Gateway Corridors.** This policy enumerates several streets that are considered “Gateway Corridors.” It does not, however, include the specific termini or street segments of these designated corridors that the policy addresses. Recommendation: Revise the amendment to include a map illustrating the precise location of these corridors.

**Policy 2.7.5.** The meaning of the first usage of the term “areas” in this policy is not clear. Could it be replaced with a more precise term; e.g., “the MMTD?”

**Future Land Use Map, Page 16.** Revise to include the title, *Future Land Use Map* (or other as appropriate) and include referenced timeframe that the map represents.

- **Policy 2.8.2.** This policy includes the statement, “To ensure a mixture of uses in mixed-use land use categories, a minimum of 5% open space (which may include landscaping and stormwater facilities subject to land development regulations) is required...” It’s not clear whether or how requiring a minimum threshold of open space area will ensure a mixture of uses in the the mixed-use land use categories.

**Policy 2.8.3.** The first paragraph of this policy implies but does not explicitly state that state and national forests, wildlife management areas, and other managed natural areas will be comprise the lands to be included in the Natural Areas Future Land Use Category. As drafted, the policy implies non-managed areas would not be appropriately included in this category. Suggestion: Revise the policy for precision and clarity with regard to what lands are intended to be designated within the category.

**Policy 2.8.7. - Part 5.** It is unclear what this sentence means: “To encourage redevelopment in the Lake Protection category, land development regulations may provide for a partial credit applied toward existing impervious surface on previously developed sites.” Does this mean redevelopment sites may include a greater proportion of impervious surface than would otherwise be required for new development, or?

- **Policy 2.8.8. - Part 1.** This part of this policy describing the Sub-Urban Residential Preservation Future Land Use Category sets out as criteria for inclusion in the category, “Assessment of stability of the residential area, including but not limited to: a. Degree of home ownership b. Existence of neighborhood organizations.” While tenure and participation in neighborhood organizations are traditional measures of neighborhood stability/transition and cohesiveness, they can also be used to simply enable development interests to reclassify (i.e., change the future land use map) to rezone and redevelop lower-income areas, where homeownership rates may be lower than the community as a whole and there is less participation in neighborhood organizations. This results in displacing existing residents and potentially increasing their housing cost burdens with higher rents.

**Policy 2.8.8. - Part 2.** This part of this policy requires zoning districts within the Sub-Urban Residential Preservation Category allowing densities over six units per acre to implement a Commission-approved neighborhood plan. Would this apply to the provision of inclusionary housing that is developed at densities exceeding six dwelling units per acre (even if the applicable zoning district establishes a maximum nominal density of six dwelling units per acre)?

**Policy 2.8.8. - Part 5.** This part of this policy exempts cemeteries and religious facilities, used solely for religious use, from having to provide effective visual and sound buffering (either through vegetative buffering or other design techniques) where they adjoin low density residential areas. It is recognized that is a continuation of the current practice of exempting these uses from such requirements. While well-intentioned and workable for smaller scale cemeteries and religious facilities, at larger scale and with more frequent usage, these uses can still present incompatible land use conflicts with adjacent/nearby low density residential land use. Accordingly, they should not be carte blanche exempted from sound and visual buffering requirements when adjacent to low density residential use; instead, they should be subject to such standards and be required to demonstrate compatibility through the development application review process.

**Policy 2.8.9.** The third paragraph of the policy specifies that land development regulations shall include development standards to maintain *low traffic volumes*, vehicular speeds, and parking for nonresidential uses. It is not clear what would be considered *low traffic* volumes, but while considering this directive, recognize that the category allows for residential land use at a density up to 20 dwelling units per acre, and unless the development regulations can mandate the district residents' places of work be nearby (so that they don't require vehicular travel for their commutes) this directive may be difficult to achieve.

**Policy 2.8.9. Sub-part 1.** of the policy requires the land development regulations to include urban design, buffering, and screening standards to facilitate compatibility between residential and non-residential uses *within* the Sub-Urban Neighborhood land use category. Suggestion: Revise the wording to also recognize the need to utilize such techniques for uses outside but adjoining the category.

**Policy 2.8.12.** The fourth paragraph of this policy directs the reduction of vehicular traffic volumes. It is not clear how volume reduction might be accomplished. See related comment here on **Policy 2.8.9.**

**Policy 2.8.12. Sub-part 2.** of the policy requires the land development regulations to include urban design, buffering, and screening standards to facilitate compatibility between residential and non-residential uses *within* the Urban Neighborhood land use category. Suggestion: Revise the wording to also recognize the need to utilize such techniques for uses outside but adjoining the category. See related comment here on **Policy 2.8.9.**

**Policy 2.8.14.** This policy includes the phrase: "The *land use* is characterized..." Suggestion: Modify the phrase to read: "The *land use category* is characterized..."

This policy includes the term, *consistent street trees*. This term is vague. Suggestion: Revise the wording to provide greater clarity.

**Policy 2.8.19. Sub-part 2.** This part is related to required master plans for development within the Planned Development Special District future land use category. This part sets out requirements that are extremely specific, in comparison to the typical strategic provisions found in comprehensive plans. Is this content more appropriate in the land development regulations?

The meaning of the term, *capacity maintenance*, used in Sub-part 2.h., is unclear. The term likely refers to roadway capacity maintenance (i.e., maintaining adopted LOS for affected roadways) but could just as easily be a reference to other infrastructure capacity, e.g., stormwater management, potable water, etc. Recommendation: Revise portion of the policy further to clarify the intent.

**Sub-part 5.** This part states: "Easements, right-of-way and other improvements located throughout the Planned Development District boundary *may be required* to be dedicated in conjunction with proposed development applications to ensure adequate facilities can be constructed consistent with the Master Plan." This part is unnecessary given that it is permissive, and not obligatory, using the term *may be required*.

**Sub-parts 5., 6. & 7.** Sub-part 7 includes the following provision: "If any of these public acquisitions reduces the remaining acreage of the Planned Development below 200 acres, the Planned Development provisions of this Plan shall apply to all *remaining acreage*." Does this provision also relate to the public acquisitions referred to in Sub-part 6 and dedicated areas

referred to in Sub-Part 5? In essence, these areas would also be *remaining acreage*. If so, it is recommended that these parts be revised to ensure clarity.

**Policy 3.1.3.** This policy states that the land development regulations shall support neighborhood scale grocery uses within and adjacent to residential areas. Is this consistent with the preclusion of non-residential uses within the Sub-Urban Residential Preservation land use category? If not, make appropriate revisions to either Policy 2.8.8. [RE the Sub-Urban Residential Preservation land use category], this policy, or both.

**Objective 3.2.** This Objective establishes the Southside Action Plan strategy. Much of this Objective relates to appropriate process and is somewhat unclear in regard to what the Southside Action Plan is or should be. Suggestion: Revise the Objective, so that the substantive information provided at the end of the proposed version, relating to "...guiding the development, redevelopment, and rehabilitation of the Southside; and that the community's vision focuses on three main areas of improvement: Beautification, Investment, and Engaged and Activated Citizens." appears toward the beginning of the Objective.

**Policy 3.2.2.** This policy includes the terms *shared public spaces* and *shared spaces*. It is not clear what the term *shared public spaces* means (land areas under multiple public agency ownership/management?). It is not clear whether *shared spaces* means the same thing as *shared public spaces*. Suggestion: Revise this policy as appropriate.

**Policy 3.3.3.** This policy refers to *unified access [plans]*. Typically, in practice, the term *unified access* relates to providing access to more than one destination (for example, two or more businesses) through a single driveway connection. Is this policy, as drafted, sufficiently clear to convey this meaning? Revise if appropriate.

**Policy 3.3.4.** This policy sets out the basis for access management improvements. It is not clear if the policy provides the basis for roadway modifications, or installation/modification of signals and signage. If it is appropriate to explicitly reference these kinds of modifications, revise the policy accordingly.

**Objective. 3.4.** This Objective sets out the strategy of sharing the benefits and burdens of public sector projects across the community equitably. Subsequent implementing **Policy 3.4.2.** directs the City and County to [strive] to distribute major infrastructure projects and other public investments geographically across the community with regard to the needs of different areas. There is no implementing policy, however, specifically relating to ensuring that no particular portion of the community is or becomes overburdened with the adverse impacts of/burdens resulting from the provision infrastructure and public facilities. Would the inclusion of such an implementing policy be helpful? If so, revise the amendment to add such policy.

○ **Policy 3.5.1.** This policy does not address the strategy of designing and siting infrastructure for purposes of facilitating greater community resiliency and hazard mitigation. Recommendation: Include other policy(-ies) in the amendment that would facilitate the greater resiliency and mitigation of hazards in regard to the siting and design of infrastructure and public facilities or revise this policy as appropriate.

This policy refers to *design speed*. This is an appropriate consideration in street design; it is not clear that general public understands this term, however. Suggestion: Revise the policy as appropriate and/or define the term *design speed* within a companion glossary.

**Policy 3.6.4.** This policy includes the following statement: “Incentives for greater density and intensity up to 25% will be permitted for developments along arterials for developments that incorporate urban design standards resulting in more attractive developments.” Based on the preceding sentence in the policy (“allow densities or intensities that exceed unincentivized limits set out in the Future Land Use Category”), the 25% standard is *25% greater than the limit otherwise applicable*. If this not correct, revise the policy as appropriate.

Please ensure that within the implementing land development regulations, the scope of this incentive is roughly proportional to the what the developer provides. For example a 50-acre development site that has 100 feet of frontage along an arterial street, and that provides some shrubbery along this frontage, probably should not be entitled to a 25% increase in permissible density/intensity for the remainder of the site, a site that may extend several hundred feet from the arterial. This issue is most appropriately fleshed out in the land development regulations but perhaps it might be appropriate to provide some related direction in the land use and mobility element.

If the land use and mobility element will retain the provision for a 25% density bonus provided in exchange for affordable or inclusionary housing as has been provided in the comprehensive plan, how will that bonus incentive work in conjunction with this bonus incentive? Could a developer obtain both bonus incentives?

**Policy 3.6.7.** This policy includes the following phrase: “...until the expiration of the approved development...”. Recommendation: Consider revising for precision to state: “...until the expiration of the approved development order for that development...”

**Policy 3.7.3.** This policy sets out design criteria for *Mobility Hubs*. Will *Mobility Hubs* be designated on the future land use map or other map adopted in the comprehensive plan or on the official zoning map of the applicable jurisdiction? How will this concept be used? Suggestion: provide more guidance and overarching strategy for the *Mobility Hub* concept.

○ **Policy 4.1.4.** This policy relates to *pattern books*, an urban design tool used to provide information regarding the appropriate character and architectural attributes of the built environment in a specific neighborhood or area.

The policy states that “Pattern books may be developed to identify a specific range of housing types allowed for different land use categories.” This strategy is inconsistent with the traditional use of pattern books. 1) Pattern books are typically more narrowly tailored to fit a *specific neighborhood* or development, *not an entire land use category*, or even zoning district. It is difficult to envision the built environment in an entire future land use category based on a singular pattern book. 2) Pattern books usually address such urban design elements as *architectural style*, including architectural details, the orientation of structures on lots and their relationship to the street, and other specific details relating to urban form. Recommendation: This policy should be revised accordingly, to more accurately reflect the typical content and usage of Pattern Books in the urban design of a community.

**Objective 4.2 and Subsequent Implementing Policies.** This Objective and implementing policies relate to facilitating transit-oriented development (TOD) near *mobility hubs* and around *transit centers*. Will *mobility hubs* and *transit centers* be designated on adopted maps? Recommendation: Revise the comprehensive plan as appropriate. See also comment here on **Policy 3.7.3**, relating to the term *Mobility Hub*.

**Policy 4.2.2.** This policy enumerates guidance for content of implementing land development regulations relating to TOD. Some of the guidance provided is somewhat vague and/or may be at the level of specificity more appropriate to land development regulations. For example: “Create public plaza directly fronting one or more sides of the center building where feasible”  
Suggestion: Revise if appropriate.

**Policy 4.2.4.** This policy specifically tasks the *Planning Department* with the evaluation of potential trail-oriented development. Suggestion: Revise to more generally refer to “staff” or “local government” to recognize that local government assets, resource availability, etc., change over time and other departments or agencies may need to perform this task in the future.

**Policy 4.2.5.** This policy refers to a *Mobility Hub*. See comment here on **Policy 3.7.3.**, relating to the term *Mobility Hub*.

**Policy 4.4.1.** [Remarkably, this policy is no longer Policy number 2.1.9.] This dinosaur is not extinct!

**Goal 5 and Subsequent Objectives and Implementing Policies.** This strategy “cluster” does not include any policy provisions for coordinating the provision of adequate and appropriate infrastructure (other than transportation infrastructure) necessary to support the targeted economic development (or targeted areas for economic development).

**Policy 6.1.4.** This policy relating to street design includes the following scrivener’s error: “... but not to limited lane width ...”. Suggestion: Correct the policy so that this phrase reads: “but not limited to lane width.”

**Policy 6.2.5.** This policy addresses interconnectivity within development. It is not apparent that this policy or any other policy in the proposed Land Use and Mobility Element promotes retrofitting existing development to enhance interconnectivity. Recommendation: Consider revising the element to include such strategy.

**Policy 6.3.1.** This policy refers to *Safe Systems*. What is the meaning of this term? What agency is responsible for administering *Safe Systems*? For example, is this a FHWA program that focuses on the design of transportation infrastructure? Recommendation: Revise this policy to provide more information about what *Safe Systems* are.

**Policy 6.3.3.** This policy establishes the requirement to maintain a *Context Classification Map*. Is this map intended to be adopted as part of the comprehensive plan? Or adopted by ordinance but not in the comprehensive plan? Recommendation: Provide additional information on how/where this map will be documented/adopted.

**Policy 6.3.8.** This policy prescribes the peak hour level of service (LOS) standards for streets and roadways in the community. Recommendations: 1) Revise the policy to clarify that the LOS provided is for the PM peak hour, unless the peak hour (e.g., AM, mid-day, PM) is intended to be determined for each applicable facility at time of analysis. 2) Revise the policy to clarify that the LOS standards provided are for automobile travel (i.e., not transit service, bicycle mobility, pedestrian mobility, etc.).

**Policy 6.4.4.** This policy refers to maintaining a bicycle and pedestrian master plan. Is this master plan to be adopted? The presumption will be that it will not be included as a component of the comprehensive plan. Recommendation: Verify what the status of this master plan will be and revise this policy accordingly.

**Policy 6.4.6.** This policy includes the statement: “City and County departments with interests in the public right-of-way shall identify funding sources...”. Typically, this kind of directive relating to inter-office protocols and assignments is set out in local governments’ internal administrative policies and directives, not in comprehensive plans and adopted regulations. Suggestion: Revise the amendment as appropriate.

**Policy 6.4.14.** This policy refers to replacement of existing continuous two-way left turn lanes [also referred to as *open medians*, and in the vernacular, as “suicide lanes,” and “twiddles”] with raised medians and exclusive turn lanes on multi-lane arterials. Does this direction preclude or disincentivize signalization (i.e., reconstructing with closed (raised) median, except with limited median opening(s) with signalization to control traffic flow) as an option? Should it? Recommendation: Analyze this policy on its potential to limit future median reconstruction and signalization and revise as appropriate.

**Policy 6.7.2.** This policy relating to Mobility Hub location coordination has been revised from the previous draft to delete the direction: “Mobility hubs shall benefit low-income, minority, disabled and senior residents.” Although the deleted wording was imperfect, it did represent an important objective of providing access to residents that dependent on modes of travel other than by driving their own car. Suggestion: Revise this policy to re-incorporate appropriate direction, such as: “The design and location of mobility hubs shall be take into account the need to serve low-income, minority, mobility-challenged, and senior residents within our community.”

**Policy 6.8.2.** This policy provides direction on enhancement of bicycle and pedestrian Infrastructure. This policy seems very similar to other strategy set out in the draft Land Use and Mobility Element. Is it redundant or can it be included/combined with other draft policies? Suggestion: Revise if appropriate.

**Policy 6.8.7.** This policy relating to drop-off & pick-up zones concludes with the phrase: “Criteria shall be with regard to size of the use, provide design standards, location on site, and the availability of porte cocheres or valet operations that meet the design requirements. ” This phrase has been revised from the previous draft version but remains confusing. Suggestion: Review and revise the policy if appropriate.

**Objective 6.11.** This Objective relates to the provision of aviation facilities. It mentions meeting the demand for military (aviation) services. Suggestion: Verify that military aviation services are intended to be accommodated locally. Revise this policy if appropriate.

**Policy 6.11.2.** This policy sets out direction for an airport master plan. Is this master plan to be adopted? The presumption will be that it will not be included as a component of the comprehensive plan. Recommendation: Verify what the status of this master plan will be and revise this policy accordingly.



**From:** Nora Underwood <[nunderwood2001@yahoo.com](mailto:nunderwood2001@yahoo.com)>  
**Sent:** Friday, May 9, 2025 6:27 AM  
**To:** Ccattach <[Ccattach@leoncountyfl.gov](mailto:Ccattach@leoncountyfl.gov)>  
**Subject:** Comprehensive plan - residential land use

Dear Commissioners,

I am writing to support the suggestions of the Alliance of Tallahassee Neighborhoods regarding land use in the comprehensive plan. Neighborhood involvement in the process is key.

In particular, prior to rezoning, the City Commission should be required to adopt a neighborhood design plan prepared with the neighborhood involvement, directing the Planning Department to hold community meetings to review the new maps and policies and to report back on the comments prior to the adoption of the new plan.

I also support the ATN's request that a master plan be prepared for the Northwood Mall property, and that the Midtown Master Plan be included in the comprehensive plan.

I do not necessarily oppose re-zoning, but feel strongly that these processes must be done with plenty of community involvement and careful planning. Tallahassee has suffered from a lot of poorly planned development in the past, and also benefited greatly from more recent community-based planning efforts. Please take the time to make sure the community is involved and make sure it will continue to be involved rather than turning decisions over to developers.

Thanks for your consideration,

Nora Underwood  
1123 Maple Dr.  
Tallahassee

**From:** William Stone <[williamstone1048@gmail.com](mailto:williamstone1048@gmail.com)>  
**Sent:** Thursday, May 8, 2025 3:51 PM  
**To:** Ccattach <[Ccattach@leoncountyfl.gov](mailto:Ccattach@leoncountyfl.gov)>  
**Subject:** Comp plan changes- higher density/commercial

Commission,

I want to voice my opposition to these changes. The proposed new 3x more density, quadraplexes, commercial infill in my designated historic neighborhood- Woodland Drives is a wrong headed and will over time erode the quality of this unique area. We are already beset with encroaching urban pressures of a negative quality- noise, traffic issues, rubbish etc. These proposed changes allowing for more density, commercial uses and the resulting diminishment of our zoning protections will be much regreted by those who care about and live here.

Please do not approve these changes for Woodland Drives.

Thank you

William B Stone 850 933-2342

**From:** Jane fleitman <[birdladytoo@gmail.com](mailto:birdladytoo@gmail.com)>  
**Sent:** Friday, April 25, 2025 1:16 PM  
**To:** Ccattach <[Ccattach@leoncountyfl.gov](mailto:Ccattach@leoncountyfl.gov)>  
**Subject:** Urban residential preservstion

I am writing to you all in opposition to the new land use for the UrbanResidential Preservstion. I do not want you to include Lafayette park in that Preservation. It is a terrible idea to change our land use designation to allow commercial offices and apartments and multiplexes. The new land use category would also double our allowable densities. A terrible idea. There are areas downtown that would benefit from this.

I find this happens all over, you get people to make decisions that affect others but not the people who make these decisions,, only the people that either live or work where these decisions are made. You should all be ashamed of yourself

Hopefully you will do the right thing and not include Lafayette Park in thid decision.

Thank you.

J, Fleitman

**From:** Jeff Blair <[jblair@fsu.edu](mailto:jblair@fsu.edu)>

**Sent:** Thursday, May 8, 2025 2:56 PM

**To:** Bill Proctor <[PROCTORB@leoncountyfl.gov](mailto:PROCTORB@leoncountyfl.gov)>; Brian Welch <[WelchB@leoncountyfl.gov](mailto:WelchB@leoncountyfl.gov)>; Nick Maddox <[MaddoxN@leoncountyfl.gov](mailto:MaddoxN@leoncountyfl.gov)>; Christian Caban <[CabanC@leoncountyfl.gov](mailto:CabanC@leoncountyfl.gov)>; David O'Keefe <[OKeefeD@leoncountyfl.gov](mailto:OKeefeD@leoncountyfl.gov)>; Carolyn Cummings <[CummingsC@leoncountyfl.gov](mailto:CummingsC@leoncountyfl.gov)>; Rick Minor <[MinorR@leoncountyfl.gov](mailto:MinorR@leoncountyfl.gov)>

**Subject:** Agenda Item 13 Transmittal Public Hearing Update to the Comprehensive Plan Update to the Future Land Use and Mobility Elements Comment

Dear Commissioners

Woodland Drives Neighborhood Association is requesting the the proposed future land use designation update that changes Woodland Drives from Residential Preservation to Urban Residential Preservation be excluded from any adopted amendments to the Land Use Element of the Comp Plan.

**WDNA Requests Denial of the Provisions.** Specifically, we are opposed to the following proposed changes:

|                                  | Existing Residential Preservation (RP-1)  | Proposed Urban Residential Preservation  |
|----------------------------------|---|--|
| <b>Intent</b>                    | “Preserving single-family residential character, protecting from incompatible land uses, and prohibiting densities in excess of 3.6 dwelling units per acre.” | <b>Preserve</b> existing historic walkable neighborhood <b>development patterns</b> . Intended to provide low to medium density residential uses <b>with allowances for neighborhood scale accessory commercial uses</b> |
| <b>Maximum Density</b>           | <b>3.6 dwelling units per acre</b>  | <b>12 units per acres</b>  |
| <b>Allowed Residential Types</b> | Single family, townhouses, and cluster housing  | Single family detached, single family attached, <b>duplexes, triplexes, and quadraplexes</b>   |
| <b>Non-Residential Uses</b>      | <b>None</b>   | “ <b>Neighborhood scale accessory non-residential uses... such as retail, offices, and community services.</b> ”   |

Attached please find a letter explaining our concerns. Thank you.

Regards,  
Jeff Blair

Associate in Research Faculty and Associate Director FCRC Consensus Center (Retired), Florida State University

850.694.1209

[jblair@fsu.edu](mailto:jblair@fsu.edu)



THE  
FLORIDA STATE  
UNIVERSITY

“Seek first to understand, then to be understood.”

"My commitment must be to truth and not to consistency." Mahatma Gandhi

“YOU must be the change you want to see in the world." Mahatma Gandhi

“Our lives begin to end the day we become silent about things that matter.”

Martin Luther King, Jr.



May 13, 2025 County Commission Meeting – Agenda Item 13 Transmittal Public Hearing  
Update to the Comprehensive Plan Update to the Future Land Use and Mobility Elements Comment  
**Comment Unanimously Adopted by the Woodland Drives Neighborhood Association BOD May 2025**

Woodland Drives is directly and adversely impacted, and is requesting that the proposed future land use designation that changes Woodland Drives from Residential Preservation to Urban Residential Preservation, along with associated increases in maximum density, allowed residential types, and certain non-residential uses, be denied and not included in any amendments adopted to the Future Land Use and Mobility Elements of the Comprehensive Plan.

We are **opposed** to the proposed changes to the future land use designation that adversely impact Woodland Drives for, including but not limited to, the following reasons:

- A. Insufficient time for neighborhood assessment of voluminous and complex documents provided in support of the proposed changes, and insufficient time allowed for us to provide input and participate in meaningful citizen engagement opportunities;
- B. Incompatible with the character and desires of Woodland Drives residents for our historic in-town neighborhood;
- C. Lack of sidewalks, and roadway capacity to accommodate the increased density and allowed residential types, as well as non-residential uses including retail and offices; and
- D. Increased traffic and noise, and decreased safety for our residents and pets to walk and play safely in our neighborhood.

**WDNA Requests Denial of the Provisions.** Specifically, we are opposed to the following proposed changes:

|                           | Existing Residential Preservation (RP-1)  | Proposed Urban Residential Preservation  |
|---------------------------|---|--|
| Intent                    | “Preserving single-family residential character, protecting from incompatible land uses, and prohibiting densities in excess of 3.6 dwelling units per acre.” | Preserve existing historic walkable neighborhood development patterns. Intended to provide low to medium density residential uses with allowances for neighborhood scale accessory commercial uses |
| Maximum Density           | 3.6 dwelling units per acre   | 12 units per acres   |
| Allowed Residential Types | Single family, townhouses, and cluster housing  | Single family detached, single family attached, duplexes, triplexes, and quadraplexes  |
| Non-Residential Uses      | None  | “Neighborhood scale accessory non-residential uses... such as retail, offices, and community services.”  |

In summary, these amendments proposing to change the future land use designation of Woodland Drives, and other in-town neighborhoods, will degrade the quality of our neighborhood(s) and the preferences of our residents, by increasing density, increasing traffic and noise, allowing for incompatible commercial uses, and decreasing the safety and quality of life for our residents.

On Behalf of the Woodland Drives Neighborhood Association Board of Directors,  
Sincerely,

A. Youchock

Greg Youchock, President

JB

Jeff Blair, Vice President, Governmental Affairs Chair

**From:** Neil Fleckenstein <[neil@talltimbers.org](mailto:neil@talltimbers.org)>  
**Sent:** Monday, May 12, 2025 12:36 PM  
**To:** Nick Maddox <[MaddoxN@leoncountyfl.gov](mailto:MaddoxN@leoncountyfl.gov)>  
**Subject:** Re: Meeting

Nick,

As you know, Tall Timbers is a biological research station founded in Leon County almost 70 years ago to study the science of prescribed fire – including the benefits of prescribed fire for plants and wildlife as well as wildfire mitigation. Tall Timbers is also a Land Trust with over 161,000 acres of land permanently protected in North Florida and South Georgia.

On behalf of Tall Timbers, I would like to share our appreciation of the hard work that Planning Department staff have invested in the Future Land Use and Mobility element update. Throughout this process, Tall Timbers staff have worked closely with the Planning Department on issues involving our working forestlands, conservation lands, and rural areas.

Importantly, as a result of the Department's analysis, it is clear that **no** significant changes are needed to the Urban Service Area (USA) and **no change** is needed to the current 1 dwelling unit/10 acre Rural residential density to accommodate our community's projected growth over the next 20 years. (We do understand the need for minor modifications to the Urban Service Area and for slightly higher residential density associated with the extension of sewer to Woodville). As we have seen over the life of our community's Comprehensive Plan, maintaining the existing USA and Rural residential density are two of the most effective tools to protect rural working lands, preserve our natural resources, and efficiently use taxpayer dollars by discouraging growth in rural areas.

While there are many changes for you to contemplate as you review the updated Plan, please continue to support maintaining the USA and our 1 dwelling unit/10 acre Rural residential density as discussed above.

Thank you,

Neil

Neil Fleckenstein, AICP  
Planning and Advocacy Coordinator  
Tall Timbers  
13093 Henry Beadel Drive Tallahassee, FL 32312  
Cell: 850-728-6235

**From:** JoAnn Mrazek <[jdmrazek@comcast.net](mailto:jdmrazek@comcast.net)>  
**Sent:** Monday, May 12, 2025 4:24 PM  
**To:** Ccattach <[Ccattach@leoncountyfl.gov](mailto:Ccattach@leoncountyfl.gov)>  
**Subject:** Future Land Use Designations

Commissioners: I have been a resident of Tallahassee for over 40 years and currently live in the Woodland Drives neighborhood. My children were raised here and my grandchildren live here. I am submitting my comments **in opposition** to the proposed changes to the future land use designation that adversely impact Woodland Drives for, including but not limited to, the following reasons:

Insufficient time for citizen review of voluminous and complex documents provided in support of the proposed changes, Insufficient time for neighborhood residents to adequately assess and comment on the impacts of the proposed changes, incompatible with the character of our historic in-town neighborhood,

Incompatible with the desires of Woodland Drives' residents for our historic in-town neighborhood, lack of sidewalks, and roadway capacity to accommodate the increased density and additional allowed residential types, as well as non-residential uses including retail and offices, and Increased traffic and noise, and decreased safety for our residents and pets to walk and play safely in our neighborhood. I would welcome the opportunity to discuss this further, and look forward to more debate on the subject.

**From:** Bill Mrazek <[wdfishy@gmail.com](mailto:wdfishy@gmail.com)>

**Sent:** Monday, May 12, 2025 4:29 PM

**To:** Ccattach <[Ccattach@leoncountyfl.gov](mailto:Ccattach@leoncountyfl.gov)>

**Subject:** Future Land Use Designations - proposed changes

Commissioners: I have been a resident of Tallahassee for over 40 years and currently live in the Woodland Drives neighborhood. My children were raised here and my grandchildren live here. I am submitting my comments **in opposition** to the proposed changes to the future land use designation that adversely impact Woodland Drives for, including but not limited to, the following reasons: Insufficient time for citizen review of voluminous and complex documents provided in support of the proposed changes, Insufficient time for neighborhood residents to adequately assess and comment on the impacts of the proposed changes, incompatible with the character of our historic in-town neighborhood, Incompatible with the desires of Woodland Drives' residents for our historic in-town neighborhood, lack of sidewalks, and roadway capacity to accommodate the increased density and additional allowed residential types, as well as non-residential uses including retail and offices, and Increased traffic and noise, and decreased safety for our residents and pets to walk and play safely in our neighborhood. I would welcome the opportunity to discuss this further, and look forward to more debate on the subject.